



# **AAFCO Human Grade Standards for Pet Products**

*For Manufacturers of Pet Products Certification  
through the United States Department of  
Agriculture Auditing and Verification Programs  
Division*

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## Background and Purpose

### Background

There have been “human-grade” claims on some pet foods for a few years. This term has no definition in any animal feed regulations. Extremely few pet food products could be considered officially human edible or human-grade. A pet food that actually met these standards would be expensive. While pet owners can buy what they feel is best for their pet, they should understand the definitions and the odds.

The U.S. Department of Agriculture (USDA) defines products fit for human consumption to be officially “edible.” These foodstuffs have been processed, inspected and passed manufacturing regulations (i.e. process control regulations) that are designed to assure safety for consumption by humans.

Edible is a standard; human-grade is not. For a product to be deemed edible for humans, all ingredients must be human edible and the product must be manufactured, packed and held in accordance with federal regulations in:

[CFR PART 117 CURRENT GOOD MANUFACTURING PRACTICE, HAZARD ANALYSIS, AND RISK-BASED PREVENTIVE CONTROLS FOR HUMAN FOOD](#)

If these conditions are met for a pet food, human-grade claims may be made. If these conditions are not met, then it is an unqualified claim and misbrands the product.

### Purpose

This program was developed for pet food product manufacturers to implement and be audited against the standards as referenced above in CFR Part 117 by the United States Department of Agriculture’s Auditing and Accreditations Branch. Manufacturers who successfully implement the preventive controls as required by the AAFCO labeling standards for “human grade” will receive certification from the USDA that their operation meets the standards and thus are eligible to use the term “Human Grade” on pet products. This certification can be presented as verification of conformance to the Human Food Preventive Controls when pet food products are submitted for registration with the respective states with ‘human grade’ claims on the packaging. Certification through the USDA Agricultural Marketing Services Audit Division can potentially improve the efficiency of the feed license application process by greatly reducing the amount of documentation currently required for submission to various state agricultural feed licensing divisions. Additionally, USDA verification provides a third-party government certification that pet food manufacturers are following Human Food Preventive Controls and meet the intent of the AAFCO labeling standards for “human grade”. This program is voluntary for manufacturers of pet products and is recognized by AAFCO as an approved certification for compliance to requirements of the AAFCO Official Publication 2017 guidance for “human grade”. Manufacturers are responsible for all costs associated with obtaining certification through the USDA Agricultural Marketing Services auditing division

## Human Grade Guidelines

The following are the AAFCO guidelines for Human Grade Claims.

AAFCO recommends and supports the following guidelines for the use of the term “Human Grade” in the labeling of pet foods and specialty pet foods.

- (1) In the AAFCO-defined feed term “human grade” the use of the term “human grade” is only acceptable in reference to the product as a whole. The deed term specifies that every ingredient and the resulting product must be stored, handled, processed, and transported in a manner that is consistent and compliant with regulations for current good manufacturing practices (cGMP’s) for human edible foods as specified in 21 CFR part 117.
- (2) In the definition, the term, “human grade” is false and misleading if the product as a whole is not human edible. “Human grade” claims may not be made for individual ingredients in a finished product that does not fully adhere to the manufacturing and ingredient specifications identified above.
- (3) In order to substantiate that a “human grade” claim is truthful and not misleading, a manufacturer making one or more “human grade” claims must have documentation that:
  - A. Each of the individual ingredient suppliers has verified that the individual ingredients supplied to the manufacturer are fit for human consumption.
  - B. Every ingredient and the resulting product are stored, handled, processed, and transported in a manner that is consistent and compliant with regulations for cGMP’s for human edible foods as specified in 21 CFR part 117.
  - C. The manufacturing facility is licensed to produce human food by the appropriate authority (which varies by jurisdiction). Such evidence may include, but is not limited to, facility licenses or permits for operation of edible food manufacturing facility or results of most recent inspections issued by local, county, or state public health authorities.
- (4) A pet food or specialty pet food product with “human grade” claims must be clearly labeled for its intended use as animal food, such as “dog food” or “cat treats,” and follow all other pet food or specialty pet food labeling requirements. The following also applies to labeling:
  - A. Statements of quality or grade may not appear in the ingredient statement [PF5(d)(3)].

- B. All uses of the words “human grade” on the label can be no larger than the statement of intended use required by PF2(a)(2).
- C. A claim of “human grade ingredients” is only acceptable if the product complies with all parts of this guideline
- D. In order to use the term “human grade” on labeling (brochures, point of sale materials, websites, etc.), the statement of intended use must also be included. All uses of the words “human grade” on labeling can be no larger than the statement of intended use.

Manufacturers that produce pet products that are deemed in-edible by human edible standards in the same facilities as ‘human grade’ are **not** eligible for the human grade certification through the USDA Agricultural Marketing Services.

## Program Verification

**Manufacturers can obtain USDA certification in one of two ways.**

1. **Quality System Assessment (QSA)** – USDA will conduct an audit of the manufacturers quality system in accordance with QAD 1002 Program and the Human Grade Standards audit checklist. <https://www.ams.usda.gov/sites/default/files/media/QAD%201002.pdf> Companies that successfully pass the audit would then be included on the USDA AMS web listing of approved manufacturing facilities for compliance with Human Grade claims. Manufacturers that are certified under the QSA **would not** be eligible to utilize any of the Agricultural Marketing Services Process Verified shields or verified claims on any pet product packaging or point of sell materials.
2. **Process Verified Program (PVP)** – USDA will conduct an audit of the manufacturers Process Verified Program in accordance with the QAD 1000, QAD 1001, and the Human Grade Standards audit checklist. Companies that successfully pass the audit would then be included on the USDA AMS Process Verified Program web listing of approved manufacturing facilities for Process Verified Program Human Grade claims for pet products. Manufacturers that are certified under the Process Verified Program **would** be eligible to utilize any of the Agricultural Marketing Services shields or verified claims on any pet product packaging or point of sell materials.

Manufacturers that elect to participate in the voluntary ‘human grade’ certification program will be responsible for completing the application process, providing all requested information to the Quality Auditing Division (QAD)

## Resources

**AAFCO Publication and other information related to pet labeling.**

<http://www.aafco.org/Publications>

**Agricultural Marketing Services Auditing and Accreditation Overview**

<https://www.ams.usda.gov/services/auditing>

**Agricultural Marketing Services Quality Systems Assessment Information**

<https://www.ams.usda.gov/services/auditing/qa>

**Agricultural Marketing Services Process Verified Program Information**

<https://www.ams.usda.gov/services/auditing/process-verified-programs>

## Appendix

### Appendix 1 – Audit Checklist for AAFCO Human Grade Standards for Certification of Human Grade Labeling of Pet Products (Insert Here)