

## STARTING A PET FOOD BUSINESS

Often, the love of pets can lead to a desire to create a healthy and tasty pet food or treat for our animals. The purpose of this checklist is to share relevant information about best practices for people starting a new pet food company, including what the products are made from, how they are processed, and how they are labelled and advertised for sale.

In Canada, pet food is not licensed the same way that human food or livestock feeds are regulated. Pet food is mainly controlled under ‘best practices’ that include labelling guidelines and following Good Manufacturing Practices and safe food plans for production. Having said this, there are some regulations under various acts (noted below) that apply to pet food, minimum labelling information, and not being misleading.

This checklist highlights different areas of consideration for getting into the manufacture and sale of pet food, including pet treats. Links to more detailed information are also provided in the Appendix.

## GUIDANCE & REGULATIONS

Pet food, unlike feed for livestock, does not require licensing. However, there are components of pet foods sold commercially that are regulated by different acts and organizations. These are:

- The Consumer Packaging and Labelling requires that prepackaged pet food destined for retail be **labelled with a bilingual common name, net quantity declaration and dealer name and address**. The legislation also prohibits false and misleading representations and deceptive marketing practices.
- Health Canada administers legislation prohibiting unsubstantiated **health claims** in the advertising and labelling of pet food.
- Canadian Food Inspection Agency (CFIA) administers legislation requiring the certification of certain **imported** pet foods containing animal products.

## SAFE PROCESSING

Outside of these regulations, best practices are advised for manufactures of pet food, which would include following Good Manufacturing Practices (GMPs) and food safety plans (e.g., Hazard Analysis Critical Control Point) to ensure the safety and efficacy of pet food products.

For traditional wet or dry pet foods, processing steps often include heat treatments and/or drying, which helps to make products safe with a long shelf-life. For many ‘home made’ pet treats, baking or dehydration is often used, so again treats are usually shelf stable. It is prudent to confirm the product attributes such as measuring water activity, which can indicate that the products will remain stable at room temperature. Packaging is another consideration, where you may need barrier film to ensure your dried product doesn’t pick up moisture through the package, over time, which would diminish food safety and quality too.

## RECALLS

Another important consideration is recalls. Hopefully this won't ever happen, but it is in your best interest to have some way to identify your product package with a batch date. This can be a simple sticker that identifies the batch and when it was made. Or if you add a "best before" date this can be connected to the date it was made (e.g., if a 3-month shelf-life, your best before date would be 3 months from the date of production). As this is not regulated by CFIA, you would be responsible to inform people, with urgency, through social media and other methods about any recalls, to avoid any harm to pets.

## INGREDIENTS & FORMULATIONS

While there are no regulations, other than the Health of Animals Act\*, that regulate ingredients and product formulations, no reputable company would make pet food without expertise in nutritional requirements and ensuring only quality ingredients are used. Similar to human food, the ingredients play a key role in the health and safety of the finished product. As a smaller company, it is best to buy ingredients from certified suppliers such as retail stores or food distributors. As you grow larger you may be able to source ingredients from commercial suppliers which can cost less if higher volumes are purchased.

Your formulation (or recipe) should also be considered in terms of nutrients and health for pets. Many smaller pet food companies often start with pet treats or snacks. While safe ingredients are necessary, the nutrient value is less concerning vs. pet food. Recently, there are some newer 'healthy' ingredients being used in products such as hemp seeds/oils, or omega 3 fatty acids, as examples. It is wise for manufacturers to consider pet food ingredients in a similar way to human food ingredients, in terms of how animals may be affected by specialty ingredients. It is good practice to access expertise in terms of animal feed, nutrient needs and potentially harmful ingredients.

*\*Health of Animals Act:* This act pertains to pet food ingredients in that specified risk materials (SRMs) of bovine animals cannot be fed to pets. They must be removed from any bovine ingredients, used in pet food production.

## LABELLING

As noted previously, specific label requirements are set out in Federal and Provincial Acts and Regulations. Specifically, the *Consumer Packaging and Labelling Act* prescribes **three** mandatory labelling requirements for pet food:

1. **Product Identity:** The common or generic name of the product, such as "Dog Food" or "Cat Food" or similar designations in both English and French, must appear on the principal display panel.



**2. Net Quantity:** The net quantity statement, in English and French, must be shown on the principal display panel in metric units of measurement. The use of a correct metric symbol meets the bilingual net quantity requirement.

**3. Dealer name and Principal Place of Business:** The label must specify the name and principal place of business of the person by or for whom the product was manufactured or produced for sale. This name and address should be sufficient for postal delivery. The declaration may be in either English or French and can be located anywhere on the outside surface of the package except the bottom.

An addition to these regulations, Industry Canada organized a working group to develop guidelines for product labelling on pet foods. This is not a regulation, and primarily applies to cat and dog food, excluding snacks. Still, it is a good practice to follow these guidelines as most processors do.

The following information is recommended for pet food manufacturers, based on the “*Guide for Labeling & Advertising of Pet Foods*”.

A label should contain sufficient information to provide the consumer with the common name, net weight, list of ingredients, claims, feeding instructions, guaranteed analysis, and the nutritional adequacy or intended life stage for which it is suitable. Some details of these are provided below.

## COMMON NAME

The Guidelines cover what constitutes an ingredient, and how these can be used in a product name. For example, if beef and chicken are included in the product the name can include both, with the larger quantity first.

## NET WEIGHT

This is the same as defined in the Consumer Packaging and Labelling Act.

## LIST OF INGREDIENTS

The ‘guidelines’ have information on ingredient definitions and ingredient statements.

## GUARANTEED NUTRIENT ANALYSIS

A guaranteed analysis must be shown on the label and include the following:

(Values should be stated on an "as fed" basis):

(Crude) protein: Minimum percent

(Crude) fat: Minimum percent

(Crude) fibre: Maximum percent

Moisture: Maximum percent

*Note: you do not need a guaranteed analysis for a treat product, unless you are making a claim on the label about a specific ingredient or nutrient.*

The nutrient content must be verifiable by an established Association of Official Analytical Chemists (AOAC) method or other recognized analytical method, which can be done at laboratories specializing in guaranteed nutrient analysis.

## INSTRUCTIONS FOR USE

Labels should be clear about storage and handling requirements. For example, keeping raw foods frozen or refrigerated, or refrigerating after opening (e.g., for canned foods), or keeping in a cool, dry place for dry foods.

## NUTRITIONAL ADEQUACY & NUTRIENT PROFILES

Life Stages to be used in Nutritional Adequacy Statements include:

- All Life Stages
- Gestation/Lactation (Pregnancy/Nursing)
- Growth
- Maintenance

The Guidelines include further information on Nutrient profiles, Limited or Supplemental nutrition claims, and Special Dietary use.

## CLAIMS

The guidelines are applicable to statements made on labels, labelling or other promotional material, including but not limited to print and broadcast media and electronic commerce. There are several conditions on which claims can be made on pet food that are included, along with information on health and nutrient claims.

Lastly, the guidelines include cautions around misrepresentation and deceptive endorsements.

## SUMMARY

While pet food is currently less regulated than human food, it is essential to be aware of the regulations and best practices recommended for pet food manufacturing. And while some requirements are not specific to treats, we know processors want to ensure their products are healthy, nutritious and safe to eat and trust this information can help you get started on this path.

## MORE INFORMATION

- **General information about pet food:**

[Pet Food Association of Canada - Learning About Pet Food](#)



[Association of American Feed Control Officials](#) – Starting a Pet Food Business (note: regulations may be different in the US, but general information is similar).

- **Labelling**

[Guide for the Labelling and Advertising of Pet Foods](#)

[Consumer Packaging & Labelling Regulations](#)

- **Nutrition/Life stages**

Association of American Feed Control Officials (AAFCO) has a publication describing nutritional requirements for life stages. <https://www.aafco.org/resources/official-publication/>

- **Other resources**

[Canadian Veterinary Medical Association](#)

For any questions about this document or connections to resources including consultants, get in touch with us at [biofoodtech@biofoodtech.ca](mailto:biofoodtech@biofoodtech.ca).