

Health and Human Services Agency California Department of Public Health



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Frequently Asked Questions for Pet Food Processor Registration

Q1. What is a processed pet food?

A: Processed pet foods include a variety of foods such as treats, candies, jerky, dry/moist/wet foods, special diet foods, health foods, canned food, gravies, broths, dietary supplements, milk supplements for consumption by household pets. These are foods typically have been cooked, dried, canned, or have received any other processing treatment

Q2. When do I need a Pet Food Processor Registration?

A: Any person manufacturing, packaging, labeling, re-packaging/re-labeling or warehousing processed pet food must obtain a Pet Food Processor Registration prior to distributing pet foods. Out-of-state manufacturers and warehouses are also required to obtain a license from the department prior to importing pet foods into California. **This applies to manufacturers, contract manufacturers, co-packers, warehouses and cold storage facilities**. The requirement applies to those engaged in any of these activities for products under their own brand name as well as third party contract facilities manufacturing and/or holding products for someone else.

Q3. Do I need a license if I am only warehousing pet food?

A: Yes, a Pet Food Processor Registration is required for anyone who warehouses pet food in California or imports pet food into the state.

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E-Mail: FDBfood@cdph.ca.gov Website: Food Safety Program

Q4. I have a contract manufacturer and/or warehouse to make and/or distribute pet foods under my brand name. Am I required to obtain a license?

A: No, you are not required to obtain a Pet Food Processor Registration if you contract out **all** parts of the manufacturing and distribution of pet foods under your brand name. However, those facilities who are engaged in any of the activities identified under Q2 above must hold a Pet Food Processor Registration and comply with state and federal pet food regulations. If you use a 3rd party, out-of-state manufacturer, packer, copacker, labeler, or warehouse who conduct activities out of the state and then the product is imported into CA, they will be required to hold a Pet Food Processor Registration with CDPH.

Q5. Can I make pet treats from home?

A: No, processed pet food, including treats, cannot be manufactured, packaged, labeled, or stored in a residential home. All processed pet foods must be produced and distributed from an approved facility. Animal food products are not covered under California's Cottage Food Law. For more information on the Cottage Food Law, please refer to our website Cottage Food Operations. Any facility operated for the purposes of manufacturing, packing, or holding processed food is considered a processing facility. Acceptable types of processing facilities for the production of pet food include private or shared commercial kitchens, restaurant/church/school kitchens, and commercial facilities. Please consult with your local health department about additional restrictions and zoning requirements.

Q6. Can I use a food truck to sell my pet treats?

A: No. Food trucks are not approved facilities. Acceptable types of facilities include private or shared commercial kitchens, restaurant/church/school kitchens, commercial facilities.

Q7. I package and label pet foods under my brand that someone else manufactures for me. Do I need a license?

Yes, a valid Pet Food Processor Registration issued by the CDPH Food and Drug Branch is required for the manufacturing of processed pet foods. Manufacturing encompasses operations such as packing, repacking, and labeling. A separate license is necessary for each pet food processing facility. If you, as the label or brand owner, engage in any packaging, labeling, re-packaging, re-labeling, or warehousing of pet foods, you will need a Pet Food Processor Registration. If you do not perform these activities but contract with other companies to handle them, the contractors must obtain

a license if they are based in California or import pet food into California. The term "manufacture" does not include repackaging from a bulk container by a retailer at the time of sale to its ultimate consumer.

For example, if a pet store receives a large bulk shipment of dog biscuits and either has the customer place into smaller bags or the pet store employee places the dog biscuits into plastic bags for individual sale to customers, this repackaging activity is not considered "manufacturing" under the Pet Food Processor Registration requirements.

Q8. My pet food is 100% raw, do I need a Pet Food Processor Registration?

A: No. If a manufacturer is solely engaged in the manufacture of raw meat or poultry food products then the Pet Food Processor Registration does not apply. Manufacturers of fresh or frozen raw pet foods containing meat or poultry are required to obtain a license from the California Department of Food and Agriculture (CDFA), Meat, Poultry and Egg Safety Branch (MPES). For more information visit CDFA's website at CDFA - AHFSS - Meat, Poultry & Egg Safety Branch.

Q9. Do I need to complete the Pet Food Processor registration application and a Processed Food Registration application (PFR)?

A: If you are exclusively engaged in the manufacturing and/or storage of pet food, you will only require the Pet Food Processor Registration. However, the Processed Food Registration (PFR) is necessary if you also manufacture and/or store human foods such as bakery products, noodles, seafood (excluding molluscan shellfish), fruit juices, snacks, nuts, oils, processed or packaged vegetables, candy, etc. For further details on PFR requirements, please refer to Processed Food Registration.

Q10. I make organic claims on my label. Do I need an Organic Processed Product Registration

A: If you are a California Manufacturer, CDPH requires you to obtain an Organic Processed Product Registration, in addition to a Pet Food Processor Registration, if you make any "organic" claims on your pet food labels. This requirement also applies even if you are already certified by a third-party organic certifier. For more information, please see our website under Organic Food Processors

Q11. How much does a Pet Food Processor Registration cost?

A: The cost for a Pet Food Processor Registration is \$190 and must be renewed yearly.

Q12. What must I do to obtain a Pet Food Processor Registration?

A: To obtain a Pet Food Processor Registration, you must:

- 1. Submit completed Pet Food Processor Registration application with fee
- 2. Submit pet food labels with the application (for large volume labels, or digital files, please contact us by email for further instructions)
- 3. For out-of-state manufacturers only: Submit with your application a health certificate issued by a local, county, or state health department that has jurisdiction to regulate food.

Application and information can be found in the link below:

Pet Food Processor/Registration Application

Procedures for Obtaining a Pet Food License (ca.gov)

Q13. What is the health permit requirement for outof-state pet food manufacturers?

A: A health certificate from a federal, state, or local issuing authority or health agency ensures that a manufacturer complies with food safety and sanitation requirements for pet food production. It typically includes the name and logo of the issuing agencies, and may include the facility address, permit holder name, date of issuance, and expiration date. The certificate indicates that the facility adheres to health and safety regulations.

Q14. I changed the name of my pet food business, what do I need to do?

A: Contact us at FDBfood@cdph.ca.gov and provide the following information. 1. A copy of your previous Secretary of State, Statement of Information showing the owner's name and previous firm name. 2. A copy of their new Statement of Information showing the owner's name and new firm name.

Q15. My pet food company is no longer in business. How can I cancel the registration?

A: If you have closed your business, please share the following information on company letterhead (if applicable):

The firm name, the firm license, the facility address, whom it was sold to (if applicable), why the firm is closing, and the effective date.

Q16. Can I label my processed pet food "human grade"?

A: Yes. As of 8/26/2024, the pet food regulations were amended to update labeling requirements on human grade and natural. Regulations outlining the requirements for both "human grade" and "natural" can be found online at Processed Pet Food
Regulations. Pet foods labeled as "human grade" must comply with human food regulations under 21 CFR Part 117 -- Current Good Manufacturing Practice, Hazard Analysis, and Risk-Based Preventive Controls for Human Food. Pet foods labeled as "human grade" must be clear in their label that food is intended for pet consumption.

The terms "fit for human food," "fit for human consumption," continue to be prohibited in the labels or in advertisements of a processed pet food.

Q17. Do my labels need to have my business address?

A: Pet food labels must clearly name the company responsible for the product and its location, ensuring consumers can trace and contact the manufacturer, packer, or distributor. If the label shows a brand or company name that did not actually produce the pet food, it must use a qualifying phrase like "Manufactured for" or "Distributed by" to show their relationship to the product. While the street address can sometimes be left off if the company is listed in a city directory, the label must still **provide a city**, **state**, **and zip code**.

Q18. Where can I find more information on labeling processed pet food?

Pertinent laws and regulations can be found on our website <u>Food Safety Program</u>. A pet food manufacturer must comply with all state and federal laws and regulations. Additional sources can be found at:

Pet Food | FDA

The Association of American Feed Control Officials (AAFCO) > Nutritional Labeling

Microsoft Word - eight required labeling items.doc (aafco.org)