

POLICY POSITION

Canadian Human Food Law Equivalency Under the AAFCO Human Grade Pet Food Standard

Fresh Pet Food Alliance (FPFA)

www.fpfa.pet

*A position paper of the Fresh Pet Food Alliance addressed to the AAFCO Board of Directors,
Member State Feed Control Officials, and the broader pet food regulatory community.*

May 2026

1. Executive Summary

The Fresh Pet Food Alliance (FPFA) is an industry alliance of Canadian fresh pet food manufacturers committed to consumer transparency and substantive compliance with the AAFCO Human Grade Pet Food Standard. The FPFA respectfully requests that the AAFCO Board of Directors issue a formal policy clarification to all member state feed control officials confirming that the AAFCO Human Grade Pet Food Standard can be substantiated by manufacturers operating under equivalent Canadian federal and provincial human food laws.

This position is prompted by inconsistent interpretation of the standard across states. The majority of U.S. state feed control officials have reviewed compliance documentation from FPFA member manufacturers and accepted “human grade” labeling, recognizing that the substantive requirements of the AAFCO standard are fully met through Canada’s parallel human food regulatory framework. However, a small number of states have denied registration, taking the position that the standard’s reference to 21 CFR Part 117 requires literal adherence to U.S.-specific regulations rather than substantive compliance with equivalent human food safety standards.

This narrow, jurisdictional reading of the standard is inconsistent with how the majority of state feed control officials have interpreted and applied it, and creates an untenable situation in which identical products with identical compliance documentation are accepted in most states but rejected in a few. More fundamentally, this interpretation conflicts with how the U.S. federal government itself treats Canadian human food: the FDA has formally recognized Canada’s food safety system as comparable under the Food Safety Systems Recognition Arrangement (FSSRA), and USDA-FSIS treats Canada’s meat and poultry inspection system as equivalent for purposes of importing ready-to-eat food products for American consumers.

This position demonstrates three critical facts:

First, Canada’s federal and provincial human food laws impose substantively equivalent requirements to 21 CFR Part 117 across all areas relevant to the AAFCO Human Grade Standard, including facility licensing, Good Manufacturing Practices, HACCP-based preventive controls, ingredient safety, sanitation, temperature controls, and distribution chain integrity.

Second, the United States government already recognizes this equivalency. Under the FDA–CFIA FSSRA, Canadian food manufacturers with Safe Food for Canadians licences can export processed food products—including frozen meals, prepared foods, and ready-to-eat products—directly to the U.S. market for human consumption without any additional U.S. facility audit or 21 CFR Part 117 inspection. Canadian ready-to-eat meat products enter U.S. commerce daily under USDA-FSIS equivalency. The FDA trusts Canada’s regulatory system to protect American consumers eating these products—yet a handful of state feed officials contend it is insufficient for a voluntary pet food marketing claim.

Third, FPFA member manufacturers hold all applicable Canadian human food licences and certifications, maintain FDA Food Facility and Animal Food registrations, hold GFSI-benchmarked third-party certification (such as SQF Edition 9), and are inspected and found

compliant by authorities with enforcement power on at least an annual basis. This level of regulatory oversight meets or exceeds what the FDA requires for Canadian manufacturers exporting human food to the United States.

The FPFA is not asking AAFCO to change its standard. The FPFA is asking AAFCO to clarify, consistent with how the majority of states have already interpreted the standard, that the reference to 21 CFR Part 117 establishes a performance benchmark—not a geographic limitation—and that Canadian manufacturers operating under equivalent human food laws fully satisfy the standard's requirements. A clear policy communication to all state feed control officials would resolve the current inconsistency and ensure uniform, fair application of the standard nationwide.

2. The AAFCO Human Grade Standard: A Performance-Based Requirement

The AAFCO Human Grade Guidelines, released in late 2022, define “human grade” as requiring that every ingredient and the resulting product be stored, handled, processed, and transported in a manner that is consistent and compliant with 21 CFR Part 117 and those applicable federal human food laws as required by ingredient, process, and/or facility type.

The standard establishes six core requirements: (1) all ingredients must be fit for human consumption and handled under human food conditions; (2) the manufacturing facility must be licensed for human food production by an appropriate authority; (3) the facility must hold FDA registrations for both human food and animal food; (4) an annual inspection or equivalency audit must be conducted by an authority with enforcement power; (5) written procedures must preserve human grade status through distribution; and (6) labels must comply with AAFCO requirements.

The FPFA respectfully submits that nothing in the standard's language mandates that manufacturing occur exclusively within the territorial United States. The standard references 21 CFR Part 117 as the benchmark for the quality of manufacturing practices to be applied—not as a jurisdictional prerequisite. The critical question is whether the regulatory framework governing the manufacturing facility achieves the same food safety outcomes as 21 CFR Part 117, not whether the facility falls under FDA's direct regulatory jurisdiction.

This interpretation is consistent with how the majority of state feed control officials have applied the standard, accepting human grade claims from Canadian manufacturers who demonstrate substantive compliance through equivalent Canadian law. It is also consistent with AAFCO's own framework for international cooperation in feed regulation, and with the fundamental principle that food safety standards are performance-based rather than geographically restricted.

3. Canadian Human Food Law: Demonstrated Equivalency with 21 CFR Part 117

The following analysis maps each substantive requirement of 21 CFR Part 117 (Current Good Manufacturing Practice, Hazard Analysis, and Risk-Based Preventive Controls for Human Food) to its parallel requirement under Canadian federal and provincial human food law. FPFA-certified manufacturers operate under both levels of Canadian regulation.

3.1 Regulatory Framework Overview

Canadian human food safety is governed by a comprehensive, multi-layered regulatory system:

Federal (Government of Canada): The Safe Food for Canadians Act (SFCA) and Safe Food for Canadians Regulations (SFCR), administered by the Canadian Food Inspection Agency (CFIA), govern the import, export, and interprovincial trade of food products. These regulations incorporate mandatory HACCP-based preventive control plans, traceability, and licensing requirements.

Provincial — Ontario example (Government of Ontario): The Food Safety and Quality Act, 2001, and Ontario Regulation 31/05 (Meat), administered by the Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA — renamed in 2024 to the Ontario Ministry of Agriculture, Food and Agribusiness (OMAFAB); the two are used interchangeably), govern the licensing, inspection, and operation of meat processing plants within Ontario. This regulation establishes comprehensive requirements for facility operation, sanitation, process controls, personnel hygiene, temperature management, and product traceability that parallel and in many areas exceed 21 CFR Part 117 requirements. Other Canadian provinces maintain analogous provincial frameworks under their respective ministries.

Third-Party Certification: FPFA member facilities additionally hold third-party certification under a Global Food Safety Initiative (GFSI)–benchmarked program such as SQF (Safe Quality Food) Edition 9, BRCGS, or FSSC 22000. GFSI-benchmarked standards are recognized internationally as meeting or exceeding the food safety requirements of major regulatory bodies worldwide, including 21 CFR Part 117 compliance.

3.2 Detailed Regulatory Equivalency Mapping

The table below provides a comprehensive mapping between 21 CFR Part 117 requirements and parallel Canadian regulations that govern FPFA-certified manufacturers. Provincial citations below reference Ontario’s framework as a representative example; analogous provisions apply under the parallel meat-processing and food-safety regulations of other Canadian provinces.

21 CFR Part 117	U.S. Requirement	Canadian Parallel	Canadian Requirement
Subpart A — General	Facility registration, definitions, applicability	SFCA/SFCR + O.Reg 31/05	Mandatory facility licensing under the applicable provincial

21 CFR Part 117	U.S. Requirement	Canadian Parallel	Canadian Requirement
Provisions	to human food manufacturing		authority (e.g., OMAFRA Freestanding Meat Plant licence in Ontario); SFCR licence for import/export.
Subpart B — cGMPs §117.10	Personnel: disease control, cleanliness, education/training	O.Reg 31/05 Part VII, s.53	Personnel hygiene requirements: hand washing, clean clothing, health requirements for all personnel handling food products.
§117.20	Plant and grounds: maintenance, construction, pest control, sanitation	O.Reg 31/05 s.42, 46–50	Written maintenance, sanitation, and pest control programs; cleaning with hot water and detergent; potable water rinse and sanitization.
§117.35	Sanitary operations: maintenance of facilities, pest control, sanitizing agents	O.Reg 31/05 s.47–50	Written sanitation program; thorough cleaning as often as necessary to maintain hygienic environment and prevent contamination.
§117.37	Sanitary facilities and controls: water supply, plumbing, sewage, toilet and handwashing facilities	O.Reg 31/05 s.42(a); Building Code Act requirements	Facilities maintained to facilitate hygienic operation; potable water supply required; inspectors must be able to perform duties.
§117.40	Equipment and utensils: design, construction, maintenance	O.Reg 31/05 s.46, 50	Written maintenance program for premises, equipment, and utensils; equipment must facilitate hygienic operation.
§117.80	Processes and controls: raw materials, manufacturing operations, product safety	O.Reg 31/05 s.92–97	Prohibition on non-compliant processing (s.92); written recipes (s.93a); hazard identification and control (s.93c); monitoring and verification (s.93d–f).
§117.93	Warehousing and distribution: storage	O.Reg 31/05 s.51, 96, 134	Temperature/humidity controls (s.51); handling and storage to

21 CFR Part 117	U.S. Requirement	Canadian Parallel	Canadian Requirement
	conditions, transportation		prevent contamination (s.96); comprehensive transport container standards (s.134).
Subpart C — Hazard Analysis & Preventive Controls	HACCP-based hazard analysis, preventive controls, monitoring, corrective actions, verification	O.Reg 31/05 s.93 + SFCR Div. 4	Mandatory hazard identification, control procedures, monitoring, recording of deviations, corrective actions, verification through sampling and testing (s.93); plus SFCR Preventive Control Plans for import/export.
Subpart D — Modified Requirements	Qualified facilities, certain provisions for small businesses	O.Reg 31/05 facility categories	Category-based licensing with requirements scaled to risk level.
Subpart G — Supply-Chain Program	Supplier verification, approved supplier programs	O.Reg 31/05 s.101 + SFCR import requirements	Strict entry controls for all ingredients (s.101); ingredients must be from licensed facilities with inspection legends; import requirements under SFCR for foreign ingredients.
§117.150	Recordkeeping: monitoring, corrective actions, verification records	O.Reg 31/05 s.93(e, g), s.98	Records of monitoring and deviations kept minimum 1 year on premises; cooking/fermentation/smoking time and temperature records required.

4. The United States Already Recognizes Canadian Human Food Law Equivalency

The strongest evidence that Canadian human food laws are equivalent to U.S. federal human food regulations is that the United States government itself relies on this equivalency every day to permit Canadian food products to enter the American market for human consumption.

4.1 USDA-FSIS Equivalency Determinations for Meat and Poultry

The USDA Food Safety and Inspection Service (FSIS) has formally determined that Canada's meat and poultry inspection system is equivalent to the U.S. system. FSIS requires all countries exporting meat, poultry, and egg products to the United States to maintain inspection systems equivalent to those of the United States, verified through rigorous document review, on-site audits, and ongoing surveillance. Canada has maintained this equivalency status for decades, with hundreds of Canadian establishments certified as eligible to export to the United States.

The depth of this trust is extraordinary. FSIS reinspects imported meat and poultry at U.S. ports of entry from every eligible country in the world — with one notable exception. Shipments from Canada are the only foreign products that do not receive the official USDA mark of inspection stamp upon entry, because the Canadian system is considered so closely aligned with U.S. standards that this additional step is deemed unnecessary. No other country in the world receives this level of trust from USDA-FSIS.

Canadian ready-to-eat meat products — the exact category of product manufactured by FPFA fresh pet food members — enter the U.S. market for sale to American families under this equivalency framework. These products are manufactured under CFIA and provincial inspection in Canadian facilities, without any requirement for an additional U.S.-based facility audit, and are sold alongside domestically produced products in American grocery stores and restaurants.

4.2 The FDA–CFIA Food Safety Systems Recognition Arrangement (FSSRA)

In a landmark action, the FDA formally signed a Food Safety Systems Recognition Arrangement (FSSRA) with the Canadian Food Inspection Agency (CFIA) and Health Canada, under which each country recognizes the other's food safety system as comparable. Canada became only the second country in the world (after New Zealand in 2012) to receive this formal recognition from the FDA.

The practical effect of the FSSRA is significant. Under the FDA's Foreign Supplier Verification Program (FSVP) — the FSMA rule that requires U.S. importers to verify that imported food meets U.S. safety standards — importers of food from Canada receive modified, streamlined requirements. Rather than requiring U.S. importers to independently verify that each Canadian supplier meets 21 CFR Part 117 standards, the FDA accepts that Canadian food businesses licensed under the Safe Food for Canadians Regulations (SFCR) and listed on the CFIA's public licence registry automatically meet the FSVP food safety control requirements.

This means that a Canadian facility manufacturing processed food products — frozen pizzas, prepared meals, bakery products, sauces, or any other FDA-regulated food — can export those products directly to the United States for human consumption without any additional U.S. facility audit or inspection. The U.S. importer simply verifies that the Canadian supplier holds an SFCR licence and is in good regulatory standing with CFIA. The FDA has determined that Canada's regulatory oversight provides sufficient assurance that these products meet U.S. food safety standards.

4.3 The Practical Illustration: Canadian Processed Foods in the U.S. Market

To make this equivalency concrete: a frozen chicken wing manufacturer in Ontario, operating under a CFIA Safe Food for Canadians licence with an acceptable Preventive Control Plan, can manufacture cooked ready-to-eat frozen chicken wings and ship them directly to U.S. grocery stores for American families to purchase and eat. No U.S. government agency inspects that Canadian facility before the products enter the U.S. market. No AMS Process Verified Program audit is required. No 21 CFR Part 117 equivalency audit is conducted at the plant. The FDA trusts the Canadian food safety system — specifically CFIA oversight and the SFCR preventive control requirements — to provide equivalent protection to American consumers.

This same framework applies across the entire spectrum of FDA-regulated processed foods exported from Canada to the United States: frozen meals, canned goods, bakery products, confectionery, beverages, snack foods, and prepared foods of every kind. Billions of dollars of Canadian processed food products enter the U.S. market annually under this system of recognized equivalency.

FPFA-certified manufacturing facilities typically operate under a substantially higher level of regulatory oversight than the typical Canadian food exporter. A representative FPFA-certified facility holds not only the SFCR licence but also a provincial human-food meat-plant licence with routine government inspections, a GFSI-benchmarked third-party certification (such as SQF Edition 9), and FDA Food Facility registration. Yet under the narrow jurisdictional reading of the AAFCO standard, such a facility — which exceeds the regulatory requirements that the FDA trusts for human consumption — would not qualify for a voluntary pet food marketing designation.

4.4 The Logical Inconsistency

The current position of certain state feed control officials creates an untenable logical inconsistency:

<p>ACCEPTED by U.S. Government: Ready-to-eat meat products manufactured in Canadian human food facilities under provincial/CFIA inspection are deemed safe enough for American families to eat.</p>	<p>DENIED by Some State Feed Officials: The same products, manufactured in the same facility under the same regulations, cannot be labeled “human grade” when sold as pet food.</p>
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This outcome is not only logically inconsistent — it is potentially harmful to consumer transparency. If a pet food product is manufactured in a facility that produces ready-to-eat food for human consumption, under regulations that the U.S. government itself deems equivalent to American food safety law, denying the “human grade” designation provides less information to consumers, not more.

4.5 The Third-Party Audit Requirement: Redundant for Facilities Already Authorized to Export Human Food to the U.S.

AAFCO has at times indicated that Canadian manufacturers would need to undergo a third-party facility audit — such as through the USDA Agricultural Marketing Service (AMS) Process Verified Program (PVP) — to substantiate human grade claims. The FPFA respectfully submits that this requirement, as applied to facilities already inspected by a Canadian enforcement authority and certified under a GFSI-benchmarked program, is duplicative and misapprehends both the purpose of the audit provision and the regulatory status of the facility.

The AAFCO Standard's Own Language on Inspections

AAFCO Human Grade Standard 3 states: “A 21 CFR part 117 GMP equivalency audit shall be conducted annually by Agriculture Marketing Service through the Process Verified Program unless the facility has been inspected for compliance by an agency with enforcement authority with applicable food safety regulations within the last year.”

The critical word is “unless.” The AMS PVP audit is explicitly positioned as a fallback mechanism for facilities that have not been inspected by an enforcement authority. It is not a universal requirement. When a facility has already been inspected by a government authority with enforcement power — as Canadian human food facilities are inspected routinely by provincial authorities (such as OMAFRA in Ontario) under their respective Food Safety Acts — the standard's own language provides that the AMS PVP is not required.

Canadian Provincial Authorities Have Enforcement Power

Provincial human-food regulators across Canada — including OMAFRA in Ontario and analogous bodies in other provinces — operate under provincial Food Safety legislation with full statutory authority to inspect facilities, issue orders, suspend or revoke licences, seize products, and pursue prosecution for non-compliance. This is not voluntary third-party certification — it is government inspection backed by the force of law. The enforcement authority of Canadian provincial regulators over human food facilities is directly analogous to the enforcement authority of U.S. state health departments and USDA-FSIS inspectors that the AAFCO standard contemplates.

The U.S. Government Already Relies on This Inspection

This is the central contradiction: if Canadian provincial inspection authority is insufficient to satisfy AAFCO's audit requirement for a pet food label, then the U.S. should logically also refuse to accept provincially inspected products for human consumption. But it does not. Ready-to-eat meat products from provincially inspected Canadian facilities enter the U.S. market for sale to American families under bilateral trade agreements and USDA-FSIS equivalency determinations. The same inspection regime that the U.S. government trusts to protect human health cannot reasonably be deemed inadequate for a voluntary pet food marketing claim.

FPFA Member Facilities Also Hold Voluntary Third-Party Certification

Even setting aside the government inspection argument, FPFA member facilities hold GFSI-benchmarked third-party certification — most commonly SQF Edition 9, BRCGS, or FSSC 22000. These audits are conducted by accredited third-party certification bodies and assess compliance with requirements that encompass and exceed 21 CFR Part 117. GFSI-benchmarked programs are widely recognized by the FDA, major U.S. retailers, and international regulatory bodies as providing substantive assurance of food safety system effectiveness. If AAFCO requires a third-party audit as additional verification, GFSI-benchmarked certification should satisfy this requirement.

Requiring an additional AMS PVP audit on top of (a) routine government inspection by a Canadian enforcement authority, (b) GFSI-benchmarked third-party certification, and (c) the U.S. government’s own reliance on the Canadian food safety system for human food imports does not enhance food safety — it creates a bureaucratic barrier that has the practical effect of excluding compliant Canadian manufacturers from a designation they have earned on the merits.

5. Compliance Framework for FPFA-Certified Canadian Manufacturers

The Fresh Pet Food Alliance has established the FPFA Certified Human Grade program to provide state feed control officials and consumers with a clear, documented method for verifying that Canadian manufacturers meet every element of the AAFCO Human Grade Standard under parallel Canadian human food law. The following table summarizes the compliance documentation that an FPFA-certified manufacturer maintains for each element of the standard.

AAFCO Requirement	FPFA Certified Human Grade Manufacturer Compliance
<p>Ingredients fit for human consumption (Standard 1)</p>	<p>All ingredients are sourced from approved human food suppliers. Ingredient specification sheets and supplier guarantees are maintained on file. Under the applicable provincial meat-plant licence (e.g., OMAFRA in Ontario), only ingredients meeting the provincial Food Safety Act and meat regulation for human food are permitted within the facility.</p>
<p>Human food facility licensing (Standard 2)</p>	<p>The manufacturing facility holds a provincial Freestanding Meat Plant (or equivalent) licence in the highest applicable category, licensed for the cooking and preparation of ready-to-eat meat products for human consumption.</p>
<p>FDA facility registrations (Standard 2b)</p>	<p>Each manufacturer maintains FDA Food Facility Registration (human food) and FDA Animal Food registration, together with any applicable U.S. state commercial feed licences.</p>

AAFCO Requirement	FPFA Certified Human Grade Manufacturer Compliance
Annual inspection by enforcement authority (Standard 3)	The provincial authority conducts routine inspections under the applicable provincial Food Safety legislation with full enforcement authority, satisfying the “unless” clause of Standard 3. Most recent inspection date is maintained on file and made available to state feed control officials upon request.
Third-party food safety certification	Each FPFA-certified facility holds a current GFSI-benchmarked certification — most commonly SQF Edition 9 (Section 8: Manufactured Meats), BRCGS, or FSSC 22000 — providing third-party verification of food safety systems that meet or exceed 21 CFR Part 117.
Written procedures for distribution (Standard 4)	A written Food Safety / HACCP Plan is maintained consistent with provincial, CFIA, and GFSI requirements. Cold chain SOPs and distribution procedures are documented and verifiable.
Ready-to-eat product (Standard 4b)	Products meet the provincial regulatory definition of “ready-to-eat”: subjected to a process sufficient to inactivate pathogenic microorganisms so the product is safe for human consumption without further heating.
Label compliance (Standard 6)	Products are clearly labeled for intended use as animal food. The phrase “human grade” is coupled with a statement of intended use (e.g., “human grade dog food”) in compliance with AAFCO requirements.
SFCR Import licence	Where applicable, a Safe Food for Canadians Licence is held for importing food ingredients. The SFCR applies to human-consumption quality standards, providing assurance that ingredients meet human food specifications.
Export capability	A CFIA Pet Food Export Licence is maintained where products are exported to the U.S. market, confirming regulatory authorization at the federal level.

In addition to the documentation summarized above, each FPFA-certified manufacturer maintains a Manufacturer Letter of Guarantee from its production facility formally attesting to compliance with 21 CFR Part 507 (animal food) and 21 CFR Part 117 (human food) manufacturing practices as applicable to Human Grade pet food production. All supporting documentation is made available to state feed control officials and AAFCO representatives upon request.

6. International Precedent and AAFCO's Own Framework

AAFCO's mission includes guiding international feed regulators, and the organization has long recognized that effective regulation is not limited to U.S. borders. Several principles support the recognition of Canadian equivalency:

6.1 AAFCO International Engagement

AAFCO actively engages with international regulatory bodies and has historically recognized that feed and food safety standards from other jurisdictions can meet or exceed U.S. requirements. The organization's participation in Codex Alimentarius and other international standard-setting bodies reflects this principle.

6.2 FDA's FSMA Framework

The FDA Food Safety Modernization Act explicitly contemplates foreign facility compliance with U.S. food safety standards. The FSMA's Preventive Controls rule (which codified 21 CFR Part 117) was designed to be outcomes-based, focusing on whether adequate preventive controls are in place rather than on the geographic location of the facility. Canada's regulatory system was specifically designed to align with FSMA requirements to facilitate bilateral trade.

6.3 The FPFA Certified Human Grade Program

Recognizing the regulatory gap for Canadian manufacturers, the Fresh Pet Food Alliance established an independent certification framework that maps AAFCO Human Grade Standards to their Canadian legal equivalents. The FPFA Certified Human Grade program evaluates Canadian manufacturers against each element of the AAFCO standard, substituting the parallel Canadian human food regulation where the AAFCO standard references 21 CFR Part 117.

The FPFA framework provides an additional layer of accountability and transparency that goes beyond what is required by Canadian regulators, demonstrating that Canadian manufacturers seeking human grade recognition are not attempting to circumvent standards — they are voluntarily exceeding them. In Canada, this transparency is also important to help consumers understand what they are purchasing for their pets. At present there is nothing stopping Canadian pet food brands from labelling their feed products "human grade" without using any human grade ingredients or following any human food regulation processes. The FPFA Certified Human Grade program directly addresses this gap, both for the protection of consumers and for the integrity of the human grade designation itself.

7. Requested Action

The majority of U.S. state feed control officials have already accepted human grade labeling from FPFA member manufacturers, interpreting the AAFCO standard as the performance-based requirement it was designed to be. To resolve the inconsistency created by a small number of

states adopting a narrower, jurisdictional reading, the Fresh Pet Food Alliance respectfully requests that AAFCO take the following actions:

- **Issue a formal policy communication to all state feed control officials** clarifying that the AAFCO Human Grade Standard's reference to 21 CFR Part 117 establishes a performance benchmark — describing the level of food safety protection required — and does not impose a geographic or jurisdictional limitation that excludes manufacturers operating under equivalent foreign human food laws.
- **Confirm that Canadian federal and provincial human food laws satisfy the standard**, recognizing that the U.S. government itself — through the FDA–CFIA Food Safety Systems Recognition Arrangement and USDA-FSIS equivalency determinations — already accepts Canadian food safety regulations as comparable or equivalent for purposes of importing human food into the United States. Canadian processed food products, including ready-to-eat meat products, enter the U.S. market daily for human consumption under these frameworks without additional U.S. facility audits.
- **Direct states currently denying registration to align with the majority interpretation**, ensuring uniform, fair application of the Human Grade Standard nationwide. The current patchwork approach — where identical products with identical compliance documentation are accepted in most states but rejected in a few — undermines the standard's purpose of providing clear, consistent consumer transparency.
- **Confirm that inspection by a Canadian enforcement authority satisfies Standard 3**, consistent with the standard's own language that the AMS PVP audit applies “unless the facility has been inspected for compliance by an agency with enforcement authority.” Routine inspections by Canadian provincial authorities of licensed human-food facilities are backed by full statutory enforcement power, and FPFA-certified facilities additionally hold GFSI-benchmarked third-party certification.
- **Recognize the FPFA Certified Human Grade certification as a valid substantiation pathway**, or endorse a substantially similar third-party equivalency assessment framework, to provide state feed officials with a clear, documented method for verifying Canadian manufacturers' compliance with the Human Grade Standard under parallel Canadian law.

8. Conclusion

The AAFCO Human Grade Standard represents an important advancement in pet food transparency and consumer protection. The Fresh Pet Food Alliance fully supports this standard, and its members have invested significantly to meet every substantive requirement it establishes.

The majority of state feed control officials have correctly interpreted the standard as performance-based and have approved human grade labeling from FPFA member

manufacturers. The small number of states that have denied registration based on a narrow, jurisdictional reading are out of step not only with their peers but with the U.S. federal government's own position on Canadian food safety equivalency. Under the FDA–CFIA Food Safety Systems Recognition Arrangement, Canadian food manufacturers can export processed food — frozen pizzas, prepared meals, ready-to-eat products — directly to American grocery stores for human consumption, without any 21 CFR Part 117 facility audit. It is untenable to argue that these same Canadian food safety standards are insufficient for a voluntary pet food marketing designation.

The FPFA is not asking AAFCO to lower its standards or to change the Human Grade framework. The FPFA is asking AAFCO to clarify what most states have already concluded: that the standard measures food safety outcomes, not geographic origin, and that Canadian manufacturers who demonstrate substantive compliance with every element of the standard — under equivalent human food laws that the U.S. government itself trusts — are fully qualified to use the “human grade” designation.

A clear policy communication from AAFCO to all state feed control officials would resolve the current inconsistency, ensure fair and uniform application of the standard, and uphold the consumer transparency that the Human Grade framework was designed to provide.

Respectfully,

The Fresh Pet Food Alliance (FPFA)

www.fpfa.pet

Appendix A: Key Canadian Regulatory References

Ontario Regulation 31/05 (Meat) — Selected Provisions

Ontario Regulation 31/05 is cited throughout this position paper as a representative example of Canadian provincial human food law. Analogous provisions exist in the meat-processing and food-safety regulations of other Canadian provinces.

Definition of “Ready-to-Eat”

“Ready-to-eat”, in respect of a meat product, means a product that has been subjected to a process sufficient to inactivate pathogenic micro-organisms or their toxins, control spores of food borne pathogenic bacteria, or control, inactivate or eliminate any other thing present in the product that would render it unsafe for human consumption, so that the product does not require further heating or processing (other than refrigeration) to be safe for human consumption.

Category 1 Activity (Freestanding Meat Plant)

Includes the manufacturing of a ready-to-eat meat product, including cooking of ready-to-serve meat products for the purpose of consumption by humans, and any other processing activity that presents a low risk of adversely affecting safety for human consumption.

Process Controls (s.93)

Requires operators to: maintain current written recipes; ensure processes are designed to produce safe products; implement and maintain hazard identification and control procedures; monitor processes; record all deviations and corrective actions; and verify effectiveness through observation, sampling, and testing.

Standards for Handling, Storage and Transport (s.96, s.134)

Requires handling and storage to prevent contamination, control pathogen growth, and protect from physical damage. Transport containers must be clean, free from contamination, constructed of safe materials, equipped for temperature maintenance (4°C or less for refrigerated, frozen state for frozen), and cannot be used for transporting animals, inedible materials, or pest control products.

Safe Food for Canadians Act and Regulations (SFCA/SFCR)

Federal legislation administered by CFIA that governs import, export, and interprovincial trade of food. Requires mandatory Preventive Control Plans (PCP) incorporating HACCP principles, traceability systems, and licensing for food businesses. The SFCR import requirements apply only to human-consumption quality standards, providing additional assurance that ingredients entering FPFA-certified facilities meet human food specifications.

GFSI-Benchmarked Third-Party Certification

Global Food Safety Initiative (GFSI)–benchmarking standards — including SQF (Safe Quality Food), BRCGS, and FSSC 22000 — are rigorous food safety and quality management systems

recognized internationally. These programs require demonstrated compliance with food safety fundamentals equivalent to or exceeding 21 CFR Part 117, including HACCP-based food safety plans, prerequisite programs, management commitment, and continuous improvement. GFSI benchmarking is recognized by major food retailers and regulatory bodies worldwide as evidence of a facility's commitment to the highest food safety standards.

Appendix B: Regulatory Reference Index

The following index provides direct links to the official texts of all laws, regulations, standards, and government resources referenced in this position paper. All URLs were verified as of May 2026.

B.1 Canadian Federal Legislation

Document	Official Source / URL
Safe Food for Canadians Act (S.C. 2012, c. 24)	https://laws-lois.justice.gc.ca/eng/acts/s-1.1/index.html
Safe Food for Canadians Regulations (SOR/2018-108)	https://laws-lois.justice.gc.ca/eng/regulations/SOR-2018-108/index.html
CFIA Safe Food for Canadians Licence Registry	https://inspection.canada.ca/about-cfia/transparency/regulatory-transparency-and-openness/registration-listings/sfcr-licence-registry/eng/1541009817582/1541009914498
CFIA — FSVP Export Requirements (U.S.)	https://inspection.canada.ca/en/exporting-food-plants-animals/food-exports/requirements-library/fsvp

B.2 Ontario Provincial Legislation (Representative Example)

Document	Official Source / URL
Food Safety and Quality Act, 2001 (S.O. 2001, c. 20)	https://www.ontario.ca/laws/statute/01f20
Ontario Regulation 31/05 (Meat) — Full Text	https://www.ontario.ca/laws/regulation/050031
OMAFRA — Meat Regulation Overview	https://www.ontario.ca/page/meat-regulation-responsibilities-livestock-and-poultry-producers-dealers-and-buyers

B.3 U.S. Federal Regulations (Referenced for Equivalency)

Document	Official Source / URL
21 CFR Part 117 — cGMP, Hazard Analysis, and Risk-Based Preventive Controls for Human	https://www.ecfr.gov/current/title-21/chapter-I/subchapter-B/part-117

Document	Official Source / URL
Food	
21 CFR Part 507 — cGMP, Hazard Analysis, and Risk-Based Preventive Controls for Food for Animals	https://www.ecfr.gov/current/title-21/chapter-I/subchapter-E/part-507
FDA Food Facility Registration (21 CFR Part 1 Subpart H)	https://www.ecfr.gov/current/title-21/chapter-I/subchapter-A/part-1/subpart-H
FSMA Foreign Supplier Verification Programs (21 CFR Part 1 Subpart L)	https://www.ecfr.gov/current/title-21/chapter-I/subchapter-A/part-1/subpart-L

B.4 U.S.–Canada Equivalency Frameworks

Document	Official Source / URL
FSIS — Eligible Foreign Establishments (Canada)	https://www.fsis.usda.gov/inspection/import-export/import-export-library/eligible-foreign-establishments
FSIS — Import Procedures for Meat, Poultry & Egg Products	https://www.fsis.usda.gov/inspection/import-export/import-guidance/fsis-import-procedures-meat-poultry-egg-products
CFIA — U.S. Export Requirements for Meat & Poultry	https://inspection.canada.ca/en/exporting-food-plants-animals/food-exports/requirements-library/us-meat-and-poultry-products
FDA — Food Facility Registration Requirements	https://www.fda.gov/food/guidance-regulation-food-and-dietary-supplements/registration-food-facilities-and-other-submissions
FDA — FSMA Frequently Asked Questions	https://www.fda.gov/food/food-safety-modernization-act-fsma/frequently-asked-questions-fsma

B.5 AAFCO Standards & Guidance

Document	Official Source / URL
AAFCO — Association of American Feed Control Officials	https://www.aafco.org
AAFCO Human Grade Pet Food	https://www.aafco.org/wp-content/uploads/2023/01/

Document	Official Source / URL
Guidelines (2022)	AAFCO_Human_Grade_Standards_AMS.pdf
AAFCO Human Grade Guidance Document & Appendices (Sept 2022)	https://www.aafco.org/wp-content/uploads/2023/01/Pet_Food_Report_2022_Annual_Appendix_A_-_Human_Grade.pdf

B.6 Third-Party Certification

Document	Official Source / URL
SQF (Safe Quality Food) Program	https://www.sqfi.com
GFSI (Global Food Safety Initiative)	https://mygfsi.com
BRCGS (Brand Reputation Compliance Global Standards)	https://www.brcgs.com
FSSC 22000	https://www.fssc.com
Fresh Pet Food Alliance (FPFA)	https://www.fpfa.pet