



January 11, 2023

Susan Thixton
Association for Truth in Pet Food
P.O. Box 954
Safety Harbor, FL 34695

Re: Docket No. FDA-2022-P-1643

Dear Ms. Thixton:

This is a tentative response to the Citizen Petition (FDA-2022-P-1643) filed with the Food and Drug Administration (FDA) on July 21, 2022.

The petition requests “the FDA [to] require pet food label disclosure of feed grade ingredients as ‘Feed Grade’ within the ingredient panel such as:

Ingredients: Feed Grade Chicken, Feed Grade Beef...

Should a pet food/treat product consist of 100% feed grade ingredients, we ask FDA to require the label to prominently display the words ‘Feed Grade’ directly below the name of the product on the principal display panel and in the ingredient panel such as:

ABC Dog Food
Feed Grade

Feed Grade Ingredients: Chicken, Beef...

We request the same Feed Grade disclosure to be required on pet food company websites and any promotional/advertising materials including but not limited to television advertising.

We request label claims such as ‘Made with Real Chicken’ or ‘Made with Real Beef’ only be allowed if the claimed ingredient conforms to the standards established pursuant to the Meat Inspection or Poultry Products Inspection Acts by the U.S. Department of Agriculture.”

Pursuant to the administrative regulations at 21 CFR 10.30, FDA is required to respond to your petition within 180 days. FDA is currently considering the issues raised by your citizen petition; however, the Agency will require additional time to issue a final response.

FDA will issue a final response to your citizen petition after completing the analyses of all the issues raised in the petition.

Respectfully,

William T. Flynn, DVM, MS
Deputy Director for Science Policy
Center for Veterinary Medicine