

## FAQ Raw Foods for Pets

The Vermont Agency of Agriculture, Food and Markets (VAAFAM) regulates the manufacturing and labeling of pet foods under 6 V.S.A., Chapter 26 - Commercial Feeds Law, the Vermont Pet Food Regulations, and Vermont Meat and Poultry Inspection Law, 6 V.S.A., Chapter 204 and applicable rules and regulations.

### 1) Who should I contact if I want to make raw food or treats for pets?

For general questions concerning the process of registering feed products, contact Licensing and Registration at [agr.licensing@vermont.gov](mailto:agr.licensing@vermont.gov) or 802-828-2436. For questions about the feed program and raw products in particular contact [agr.feedseedfert@vermont.gov](mailto:agr.feedseedfert@vermont.gov) or 802-828-5050.

### 2) If I use raw meat and/or poultry in my product, do I need additional licenses?

Yes. If you use raw meat and/or poultry to manufacture pet food, in addition to registering each feed product, you must obtain a meat handlers license with the category of Animal Food Manufacturer. You can find information about that on the VAAFAM website: <https://agriculture.vermont.gov/food-safety/vermont-meat-poultry-inspection/forms-and-applications>.

For questions concerning meat handling as an Animal Food Manufacturer, please contact 802-828-2426.

In addition to contacting VAAFAM's meat inspection section, you will need to register with the Food and Drug Administration as a processing facility and comply with the rules set by the Food Safety Modernization Act. You can register online on the FDA's website: <https://www.fda.gov/food/registration-food-facilities-and-other-submissions/online-registration-food-facilities>

### 3) I'm using meat and/or poultry in my products, but I'm going to cook the meat first. Do I still need a meat handler's license?

Yes. If you are handling meat and/or poultry, including cooking, dehydrating, or freeze-drying meat or otherwise processing meat, you are required to have a meat handler's license.

Per Vermont Statute Title 6, Chapter 204 § 3302 (2) *"Animal food manufacturer" means any person engaged in the business of preparing animal, including poultry, food derived wholly or in part from livestock or poultry carcasses or parts or products of carcasses.*

### 4) Will I be inspected?

Meat Inspection will not inspect a pet food manufacturer for sanitation, as pet food manufacturing is under the jurisdiction of the FDA. Meat Inspection may however periodically inspect a pet food manufacturer to ensure the facility is meeting the transportation and labeling requirements as outlined in [9 CFR 325.11\(d\)](#)

Also, if you are manufacturing human food and animal feed be sure to follow sanitary guidelines as set in Federal Regulations. <https://www.ecfr.gov/current/title-9/chapter-III/subchapter-A/part-318/subpart-A/section-318.12>

**5) I have a meat handler’s license and I have created a recipe for a product. I want to start manufacturing and selling my product. What is my next step?**

A sample of each formulation must be tested for protein, fat and fiber content, and this information must be listed on the label. You may send a sample of the pet food formulation to the Vermont Agriculture and Environmental Laboratory (VAEL) or a private laboratory of your choice. You can contact VAEL at 802-585-6073.

**6) I am ready to create my label. What do I need to put on it?**

In addition to following our label guidelines if you are selling raw products, ([Feed Label Guidelines](#)) the label must state that the product is not for human consumption and include instructions for handling a raw product. Products developed for animal consumption need to be stored separately than those for human consumption. You can find more information about label requirements on our website. <https://agriculture.vermont.gov/public-health-agricultural-resource-management-division/animal-feeds-seed-fertilizer-lime/pet-food>

**7) My label is ready. I want to make sure it is ok before sending in my registration application. Where do I submit my label?**

For questions concerning your label or for preapproval, you can submit a copy of your label to [agr.feedseedfert@agr.com](mailto:agr.feedseedfert@agr.com).

**8) What about raw bones? Do I need to register them?**

If a feed product is an unaltered, single ingredient and does not make any nutritional claims, it does not need to be registered as a feed product but needs to be labeled “Not for human consumption.” If any nutritional claims are made, such as “easily digested”, “good source of protein” etc., the product needs to be registered. If the product is altered in any way, such as grinding, freeze drying, etc., the product needs to be registered.

**9) What about raw dairy products?**

Raw dairy products for animal consumption can be registered as feed products in Vermont. They need to be denatured- usually through addition of a colorant such as annatto extract, carrot oil, beet juice, paprika, saffron, turmeric etc. They also need to be labeled “not for human consumption” and at the point of sale, must be stored and sold separately from products intended for human consumption.