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Memorandum of Information: Pet Food and State Meat Inspection

Date: May 1, 2025

To: Indiana Meat and Poultry Establishments

Re: Production, sale, and distribution of pet food, pet treats and other similar uninspected, inedible products within or from Indiana official and custom exempt establishments.

References: FSIS Directive 6300.1

9 CFR 318.12, 325.11, 381.152, & 416.2

IC 15-17-5-13 and 345 IAC 9

For this memorandum a “pet” is defined as a dog or cat. Indiana code 15-19-7-15.

Background

The Board of Animal Health Meat and Poultry Inspection Program (BOAH) has seen that state establishments are interested in producing pet food. BOAH MPI collaborated with agencies that have jurisdiction in this area (USDA and Office of Indiana State Chemist (OISC)) to create this document that is intended to outline rules governing the use of source materials from inspected and custom-exempt processing to manufacture pet food.

Office of Indiana State Chemist (OISC)

Establishments manufacturing and/or distributing pet food in Indiana must hold a commercial feed license issued by the OISC and be registered as a Food Facility with U.S. Food and Drug Administration (FDA).

- 1) Indiana Commercial Feed Laws can be found in [IC 15-19-7](#) and [355 IAC 6](#).
- 2) Registration with FDA as a food facility is completed [online](#) at the FDA website. (Required under [21 CFR 1.225](#).)
- 3) FDA and OISC do not require pet food ingredients or products to be inspected or come from inspected meat and poultry sources.
 - a) It is the facility’s responsibility to produce safe food according to [21 CFR 507](#).
 - b) An animal food ingredient/product can be used in pet food if it is an approved ingredient, and it is safe, not adulterated as defined in [IC 15-19-7-29](#) and section 402 of the Federal Food, Drug and Cosmetic Act.

- 4) Pet food, including pet treats, are defined as commercial feed. IC 15-19-7-16. A person who “manufactures” a commercial feed OR whose “name” appears on the label of a commercial feed must obtain an Indiana Commercial feed license prior to distribution of those commercial feeds. IC 15-19-7-24.
 - a) Distribution can be at farmer’s markets, on the internet, veterinary businesses, pet retailers, or meat and poultry establishments.
 - b) Pet food labels must comply with state and federal regulations described in [355 IAC 6-2](#) and [21 CFR 501](#).
 - i) Raw meat that is NOT ground and/or mixed with other ingredients is exempt from the definition of a commercial feed, provided the product is not adulterated, [355 IAC 6-1-1](#). However, the addition of nutrient claims, grinding the meat and/or mixing the meat with other ingredients or adding the word “food”, “treat” or “snack”, and in some cases the word “supplement” to the labeling, would warrant licensing, product listing, and proper labeling requirements.
- 5) Indiana follows AAFCO’s Statements for Uniform Interpretation and Policy for chews, bones and toys for Pets and Specialty Pets. The following products are exempt from registration and labeling unless the manufacturer, in its product labeling or advertising, makes any claim that the product is intended for use as an animal food, or that the product provides anything of nutritional value to the animal (i.e., “digestible” or “high protein”). Exempt Pet Treats (or snacks) without nutritional claims include:
 - (1) bones, chews, toys and exercisers made of animal skin, hide, wood, or man-made material
 - (2) hooves
 - (3) ears
 - (4) animal bones
 - (5) ligaments
 - (6) snouts
 - (7) pizzles

Indiana State Board of Animal Health

Sale and distribution of pet food products from state establishments

- 1) Meat from an inspected and passed source and labeled with the state or federal mark of inspection may be sold for pet food or as a pet food ingredient.
- 2) All meat from a custom (not inspected) source and inedible materials from any source must be denatured prior to distribution.
- 3) Specified risk materials (SRM) may not be used as pet food or pet food ingredients.

Pet food manufacturing in official meat establishments.

Pet food may be produced in meat and poultry establishments if regulatory requirements are met. [9 CFR 318.12, 325.11, 416.2 \(381.152\)](#) and [345 IAC 9](#).

- 1) Under [9 CFR 318.12\(a\)](#) and [381.152\(a\)](#), pet food and other uninspected products may be manufactured in the same department as edible product, provided:
 - a) There is sufficient space and adequate equipment allotted to the production of pet products so that it in no way interferes with the preparation of, and in no way commingles, contaminates, or adulterates, inspected product intended for human consumption
 - b) Separate equipment is used for production of the pet products if necessary to avoid adulteration of inspected product, and
 - c) Pet products must be produced under the same sanitary conditions as the edible product to avoid the creation of insanitary conditions.
 - d) Production of pet products must not interfere with state or federal inspection duties.
- 2) All establishments MUST have an SOP (Standard Operating Procedures) approved by BOAH Meat and Poultry Inspection, with procedures in place to define how that establishment will handle, store, and process products intended for pet food.
 - a) All products must be handled and stored in a sanitary manner, be properly identified, and separated by time and/or space from inspected and passed product(s) or other edible product.
 - i) Denatured products cannot move from an inedible area to an edible area without proper sanitation documentation and implementation (where only human-edible, non-denatured raw materials are processed or stored).
 - b) When pet food is prepared in edible product area(s), all operations are subject to same sanitary requirements (Sanitation Performance Standards [SPS] and Sanitation Standard Operating Procedures [SSOPs]) as food for human consumption.
- 3) Raw materials (e.g. bones, pig ears) for pet products for sale may come from in-house slaughter, officially-slaughtered livestock, or purchased from Federal sources.
 - a) If the official in-house slaughter is for a third party, the livestock owner must confirm they don't want the items back before processing can continue.
- 4) ALL pet products must be clearly identified as distinguished from edible products while within the facility and properly labeled and packaged before sale/transportation.

Pet food manufacturing in custom exempt meat facilities

Remember: All parts of custom-slaughtered animals are the property of the owner of that animal and must be either returned to the owner or promptly denatured. To use custom exempt meat or offal for pet food you MUST first have confirmation from the owner that those parts are not wanted. This can be documented on the cut sheet or other form that dictates that they do not want the particular cut or product back from their animal.

- 1) All custom exempt offal/materials NOT returned to the owner must be denatured. An artificial color may be used in a pet food or specialty pet food only if it has been shown to be harmless to pets or specialty pets. [355 IAC 6-2-6](#). Custom exempt operators must ensure that the receiving Pet Food Manufacturer is informed of and accepts product with dye present.
 - a) Charcoal is NOT allowed except for bone charcoal.
 - b) The following food colorings are USDA and FDA approved denaturants for use in pet food pet food.
 - i) FD&C Blue #1, Blue #2, or Green #3
 - c) The establishment should pick one for use within the establishment.
 - d) Pre-mixed denaturant may not be safe for pets. BOAH MPI recommends mixing with water before application (a little goes a long way).
- 2) All establishments must have an SOP or GMP approved by the division with procedures in place to define how the establishment will handle, store, and process products intended for pet food.
 - a) All products must be handled and stored in a sanitary manner, be properly identified, and separated by time and/or space from inspected and passed product(s) or other edible product.
 - i) Denatured products cannot move from an inedible area to an edible area without proper sanitation documentation and implementation (where only human-edible, non-denatured raw materials are processed or stored).

All establishments must follow state and federal labeling requirements for pet food products:

- 4) While in the establishment, uninspected, inedible products must be distinguished from edible products to avoid distribution as human food.
 - a) Products MUST be labeled or identified conspicuously stated on the label (eg. "Pet Food" or "Beef Liver for Dogs").
 - b) Receptacles used for storing inedible material must be of such material and construction that their use will not result in the adulteration of any edible product or in the creation of insanitary conditions.
 - c) Receptacles must not be used for storing any edible product and must bear conspicuous and distinctive marking to identify permitted uses.
- 5) Indiana pet food and treat labeling regulatory requirements include:
 - a) The product name and brand name (if any)
 - b) The species for which the product is intended
 - c) A guaranteed analysis
 - d) A complete list of all ingredients contained in the product
 - e) Statement of nutritional adequacy or purpose
 - f) Feeding directions
 - g) The name and address of responsible party
 - h) A Quantity Statement

BOAH MPI establishments will need clear procedures in place to define how they will handle, store, and process products intended for pet food. Protocols should include lot identification and tracing of materials used and product sold. If the plant cannot devote an entirely separate area to handling these products, the best practice is to separate and handle them according to the same standards you would use for human food up until the moment an approved pet food label is placed on the final package. Even if there is a separate area for pet food production, the facility must comply with OISC's feed regulations and, if products will be shipped across state lines, FDA regulations and that state's feed regulations.

Additional Resources

- A) Office of Indiana State Chemist
 - <https://oisc.purdue.edu/petfood/resources.html>
 - <https://oisc.purdue.edu/feed/forms.html>
- B) FDA and other Federal Resources
 - <https://www.fda.gov/animal-veterinary/animal-food-feeds/how-do-i-start-animal-food-business>
 - 21 CFR Part 507 Current Good Manufacturing Practice, Hazard Analysis, and Risk-Based Preventative Controls for Food for Animals <https://www.ecfr.gov/current/title-21/chapter-I/subchapter-E/part-507>
 - Listing of Specific Substances Prohibited From Use in Animal Food or Feed 21 CFR 589.2000 <https://www.ecfr.gov/current/title-21/chapter-I/subchapter-E/part-589/subpart-B/section-589.2000>
- C) American Association of Feed Control Officials
 - <https://www.aafco.org/>
 - <https://www.aafco.org/consumers/understanding-pet-food/>