



# Guidance to Wisconsin Pet Food Good Manufacturing Practices

*This is a guidance document only, it is not a comprehensive manual for compliance, and does not constitute legal advice. It is the responsibility of the commercial feed manufacturer/distributor to ensure they are in compliance with the applicable laws and requirements. Following the guidance in this document does not preclude regulatory or compliance action by the Wisconsin Department of Agriculture, Trade, and Consumer Protection when authorized by state law, nor does it release any commercial feed manufacturer or distributor from legal responsibility or liability of any kind.*

## **Inspection Overview**

Manufacturers of pet (dog and cat) food in Wisconsin are subject to random, unannounced inspections to ensure compliance with Wisconsin commercial feed regulations, Wis. Stat. § 94.72 and Wis. Admin. Code chapter ATPC 42, specifically the good manufacturing practices in Wis. Admin. Code § ATPC 42.46. Inspections offer a facility, and consumers, the opportunity to receive a regulatory perspective on the facility's ability to manufacture animal feed that is not adulterated and is properly labeled [reference Wis. Admin. Code § ATPC 42.46(1)].

Each inspection reviews:

1. The current commercial feed license, if applicable;
2. Cleanliness and maintenance of buildings and equipment;
3. Recordkeeping and record retention; and
4. Randomly selected feed labels.

## **Commercial Feed License**

Each person or entity that distributes, manufactures, and/or labels a commercial feed or feed ingredient in Wisconsin is required to be licensed. The license requirement has three exceptions [reference Wis. Admin. Code § ATPC 42.02].

- If a facility distributes only packaged commercial feed as it was packaged and labeled by the entity whose name appears on the label, a commercial feed license is not required;
- If a facility distributes bulk commercial feed in the form it was received and already labeled by another licensee, except for net weight statement, a commercial feed license is not required;
- If a facility only distributes custom-mixes, and if ingredients in the mixtures are reported as tonnage distributed by another licensee<sup>1</sup>, a commercial feed license is not required.

Typically, the exceptions apply to retailers such as convenience stores, or big box stores that merely distribute products made and labeled by another manufacturer. Links to the license applications are available online at [https://datcp.wi.gov/Pages/Programs\\_Services/CommercialFeedLicensingFormsandTonnageReporting.aspx](https://datcp.wi.gov/Pages/Programs_Services/CommercialFeedLicensingFormsandTonnageReporting.aspx).

## **Housekeeping**

Regulations for cleanliness and maintenance of buildings and equipment are broad, to encompass the various manufacturing capabilities in the pet (dog and cat) food industry. Specifically, buildings and equipment must be adequate for the purpose used<sup>2</sup>, routinely cleaned and maintained, and kept free of unhealthful or unsanitary conditions

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<sup>1</sup> There is no requirement of a licensee to indicate to another business if they are or are not reporting tonnage and remitting inspection fees on commercial feed distributions. Licensees are to assume the tonnage is reported and inspection fees paid.

<sup>2</sup> Regulations do not require a "commercial kitchen".

[reference Wis. Admin. Code §§ ATCP 42.46(2) & (3)]. Buildings and equipment shall facilitate the manufacture of a safe and quality animal food, and shall protect the incoming and inventoried ingredients, blends in progress, and outgoing finished feeds from pests (rodents, vermin, birds, or insects), biological contaminants (e.g., infectious diseases, potentially harmful microorganisms), and the elements.

Specific to equipment, cleanliness is important to mitigate the risk of cross contamination. Ingredient build-up can occur on augers, ribbons, and paddles, particularly when using raw meat, oil, and other high-moisture ingredients. Firms may include procedures such as sequencing, flushing, and/or physical clean-out (wet or dry) to proactively prevent cross-contamination.

Finally, scales must be accurate. Scale calibration most often occurs at the facility's option, via set weights, an official DATCP Weights & Measures inspection, or a third-party calibration service.

### **Non-Feed Materials**

Areas and equipment used to manufacture, handle, or store ingredients for the manufacture of, and the finished, dog food or cat food may not be used to manufacture, handle, or store fertilizers, pesticides, or other industrial chemicals [reference Wis. Admin. Code § ATCP 42.46(4)]. Such items shall be stored in a separate, segregated area.

### **Records**

Facilities are required to keep records of all manufactured products, including product formulas, manufacturing dates, batch numbers, and shipment dates for one year from the date the feed was manufactured [reference Wis. Admin. Code § ATCP 42.46(8)]. The records requirement enables a facility to conduct a recall of specific batches of feed should an issue arise with any ingredient used in the feed. In the recent past, recalls have been related to vitamin levels and potentially harmful microorganism levels.

### **Other Good Manufacturing Practice Resources**

DATCP Resources:

- Pet Food Manufacturing Requirements Video - <https://www.youtube.com/watch?v=i4Mjww0tWPE>
- Field investigator contacts: [https://datcp.wi.gov/Pages/Programs\\_Services/EnforcementInspection.aspx](https://datcp.wi.gov/Pages/Programs_Services/EnforcementInspection.aspx)
- Feed Program contact: [datcpfeed@wisconsin.gov](mailto:datcpfeed@wisconsin.gov) or 608-224-4539

FDA Resources (<https://www.fda.gov/animal-veterinary/animal-food-feeds/pet-food>):

- Information on Marketing a Pet Food Product  
<https://www.fda.gov/animal-veterinary/animal-health-literacy/information-marketing-pet-food-product>
- CVM GFI #55 Supportive Data for Cat Food Labels Bearing "Reduces Urinary pH Claims: Protocol Development  
<https://www.fda.gov/animal-veterinary/guidance-industry/cvm-gfi-55-supportive-data-cat-food-labels-bearing-reduces-urinary-ph-claims-protocol-development>
- CVM GFI #122 Manufacture and Labeling of Raw Meat Foods for Companion and Captive Noncompanion Carnivores and Omnivores  
<https://www.fda.gov/media/70183/download>
- CPG Sec. 690.150 Labeling and Marketing of Nutritional Products Intended for Use to Diagnose, Cure, Mitigate, Treat, or Prevent Disease in Dogs and Cats  
<https://www.fda.gov/media/83998/download>