EZASSI SIGNALS

Pet Food Manufacturing Compliance (United States)

Regulatory Signals · September 2026

A Regulatory watch on the obligations that land on a US pet food manufacturing or co-packing facility: FDA’s animal food safety rules, recalls, H5N1 in raw pet food, the new pet food label rules adopted state by state, import controls and federal bills on state registration. Seven signals from one cycle.

#	SIGNAL	CONFIDENCE	HORIZON	STATUS
1	Two confirmed raw or minimally processed pet food Salmonella recalls in August 2026 signal elevated pathogen enforcement scrutiny across the raw category	High	Immediate (0–3 months)	Review
2	H5N1 commercial raw pet food detections across multiple brands and states, combined with FDA's published food-safety-plan requirement, establish a regulatory baseline that inspectors will now test	High	Immediate (0–3 months)	Review
3	Four separate 2026 recalls across three nutrient categories — thiamine, vitamin D, and multiple micronutrients — signal that nutrient formulation and process controls are an active, multi-product recall driver, not a one-off event	Medium	Short-term (3–12 months)	Review
4	Washington and Kentucky have enacted AAFCO Pet Food Label Modernization rules with 2030 deadlines while Pennsylvania treats them as voluntary — six states adopted, twelve more planned — signaling a rapidly fragmenting multi-state label compliance environment	Medium	Short-term (3–12 months)	Review
5	FDA's proposed rule requiring mandatory GRAS notices, completed program evaluation, and continuing AFIC process create a transition moment in ingredient approval that will affect how new and reformulated pet food ingredients reach lawful commerce	Medium	Short-term (3–12 months)	Review
6	FDA's parallel active import alerts covering Salmonella in all animal food and FSVP noncompliance, both active as of August–September 2026, converge with a hard October–December facility registration renewal deadline to create three simultaneous border and distribution risks	High	Immediate (0–3 months)	Review
7	H.R. 8646 passed the House with pet food ingredient and labeling provisions on June 4, 2026, while H.R. 597 remains stalled in committee — federal legislative movement is real but not yet enacted, and the gap between House passage and Senate action is the current risk window	Medium	Short-term (3–12 months)	Verified

Every signal rests on two or more dated events. Confidence is published as a band. Where a signal sits below High, the reasoning names the evidence that is missing. Status says where the evidence stands: Verified, Review, or Inconclusive — we looked, and the evidence does not yet support a firmer call.

SIGNAL 1 OF 7

Two confirmed raw or minimally processed pet food Salmonella recalls in August 2026 signal elevated pathogen enforcement scrutiny across the raw category

HIGH **Immediate (0–3 months)** · Enforcement & Compliance Signals · **Review**

Two confirmed Salmonella recalls in August 2026 — one also involving Listeria monocytogenes — establish a recurring within-month pathogen pattern in raw and minimally processed pet food that FDA inspectors are highly likely to probe at any facility in this category.

REASONING

This watch targets clusters of recalls on the same hazard as a category-wide control signal. Two separate FDA-documented events — Northwest Naturals (Salmonella plus Listeria monocytogenes, August 28, 2026) and Oma's Pride/Miller Foods (Salmonella, August 17, 2026) — involve different companies within the same calendar month, both in the raw or minimally processed segment. That recurrence across manufacturers satisfies the two-or-more-events criterion. The Oma's Pride event is additionally notable because FDA testing was linked to a consumer complaint and reported dog illnesses, which typically increases FDA follow-up intensity. While the underlying Form 483 findings and specific Part 507 citations are not available in the current findings, the recall pattern itself is the earliest public signal of where inspectors will direct questions. The category instruction — an action against one raw maker is the earliest reading of what an inspector will ask the next — applies directly here.

PATTERN

Northwest Naturals recalled frozen chicken cat food (Salmonella) and frozen chicken dog food (Salmonella and Listeria monocytogenes) on August 28, 2026; Oma's Pride (manufactured by Miller Foods, Inc.) recalled Woof Complete Canine Chicken Recipe for Salmonella on August 17, 2026, with dog illnesses reported in association with a consumer complaint; FDA's recall index lists both events within the broader 2026 pet food action record, though comprehensive confirmation of all 2026 entries could not be independently verified in public sources as of September 2026.

IMPLICATION

Any facility making raw, raw-frozen, or minimally processed pet food — or co-packing for a brand in that segment — should treat current environmental Salmonella and Listeria monitoring, supplier raw-material testing, and kill-step validation as active inspection targets. An inspector reviewing a raw facility in this climate will have the Northwest Naturals and Oma's Pride recalls as immediate context. Facilities without documented environmental monitoring programs and supplier pathogen controls are at elevated risk of a Form 483 or warning letter.

RECOMMENDED ACTION

Conduct an internal gap assessment against 21 CFR Part 507 Subpart C requirements — specifically environmental monitoring, supplier verification, and any process step claimed to control Salmonella or Listeria — before the next scheduled FDA inspection; document corrective actions in writing so they are audit-ready.

SOURCES & WHAT THEY SIGNAL

- **FDA Animal Veterinary Recalls and Withdrawals** — Lists the broader 2026 FDA pet food recall record, corroborating that the individual events sit within a documented series of agency actions.
- **Northwest Naturals Voluntarily Recalls Two Raw Pet Food Products Because of Possible Salmonella** — Confirms an August 28, 2026 FDA recall involving both Salmonella and Listeria monocytogenes in two raw frozen poultry-based products, establishing one leg of the recurring pathogen pattern.
- **Updated: Oma's Pride Voluntarily Recalls One Lot of Woof Complete Canine Chicken Recipe** — Confirms an August 17, 2026 Salmonella recall by a second manufacturer, with reported dog illnesses, adding a second independent event to the pattern within the same calendar month.

SIGNAL 2 OF 7

H5N1 commercial raw pet food detections across multiple brands and states, combined with FDA's published food-safety-plan requirement, establish a regulatory baseline that inspectors will now test

HIGH **Immediate (0–3 months)** · Enforcement & Compliance Signals · **Review**

At least three separate commercial raw-frozen poultry cat food products — RAWR, Northwest Naturals (Feline Turkey Recipe), and Wild Coast Raw — have been linked by federal and state authorities to H5N1 detections or feline illness, and FDA has formally stated that covered manufacturers using uncooked poultry or cattle ingredients must reanalyze their food-safety plans to include H5N1 as a known or reasonably foreseeable hazard, making this a current inspection test point rather than a future possibility.

REASONING

This watch treats H5N1 as a trigger category and specifies that the second commercial detection should prompt a review; the findings document detections across at least three different commercial products and two or more states. FDA has published an explicit regulatory expectation — not merely consumer guidance — that manufacturers covered by the Preventive Controls for Animal Food rule who use uncooked or unpasteurized poultry or cattle ingredients must reanalyze their food-safety plans and identify H5N1 as a known or reasonably foreseeable hazard. That FDA page was confirmed as current agency policy within or near the monitoring window. State and local health departments in California, Washington, and Oregon all issued independent official actions following commercial-product detections [32, 33, 34, 28], which corroborates that this is a multi-jurisdictional enforcement reality, not a theoretical risk. The combination of a clear published FDA compliance expectation and multiple confirmed commercial-product detections across different brands supports a high-confidence signal, though confidence is reduced from the original because one claimed state-authority detection has been removed as contradicted.

PATTERN

FDA has stated that covered cat and dog food manufacturers using uncooked or unpasteurized poultry or cattle materials must reanalyze food-safety plans and identify H5N1 as a known or reasonably foreseeable hazard. FDA reported H5N1-positive lots of RAWR Raw Cat Food Chicken Eats and linked them to the illness and euthanasia of a cat — lot CCS 25 093 was identified by the San Francisco Department of Public Health. Washington State Department of Agriculture identified Wild Coast Raw frozen Boneless Free Range Chicken Feline Formula as potentially H5N1-contaminated following indoor cat illnesses in Oregon beginning February 2025. Los Angeles County Department of Public Health issued a warning against feeding pets raw food following H5N1 detection in a commercial raw pet food product. Oregon Department of Agriculture issued HPAI veterinary guidance for pets following the feline illness events. Washington State Department of Health listed a Northwest Naturals product action in its food recalls and safety alerts.

IMPLICATION

Any facility manufacturing raw or raw-frozen cat or dog food using uncooked poultry or unpasteurized dairy or egg ingredients that has not yet documented a food-safety-plan reanalysis specifically covering H5N1 is

currently out of step with FDA's stated expectation and faces recall and enforcement exposure. An FDA inspection of a raw cat food facility today will treat the absence of an H5N1 hazard analysis as a deficiency. The state-level actions in California, Washington, and Oregon indicate that state inspectors may also use this as a review criterion.

RECOMMENDED ACTION

Complete and document a formal food-safety-plan reanalysis addressing H5N1 as a known or reasonably foreseeable hazard under 21 CFR Part 507.33, identify whether a preventive control is required, and document the virus-inactivating capability (or sourcing controls) relied upon for each relevant ingredient — then verify the plan is accessible for inspection.

SOURCES & WHAT THEY SIGNAL

- **FDA Notifies Pet Owners: Tests Show H5N1 Contamination in Certain Lots of RAWR Raw Cat Food Chicken Eats** — Documents FDA's identification of H5N1-positive commercial cat food lots and the linked feline illness case reported by the San Francisco Department of Public Health, establishing a direct commercial-product-to-animal-illness chain.
- **Cat and Dog Food Manufacturers Required to Consider H5N1 in Food Safety Plans** — States FDA's explicit regulatory expectation that covered manufacturers reanalyze food-safety plans to include H5N1 and specifies which ingredient types trigger the obligation.
- **Oregon Department of Agriculture — HPAI Veterinary Guidance for Pets** — Shows Oregon issuing state-level HPAI guidance specifically for pets following feline illness events tied to commercial raw food, adding a third state to the enforcement picture.
- **Los Angeles County Department of Public Health — Public Health Warns Against Feeding Pets Raw Food Following H5 Bird Flu Virus Detection** — Confirms a California state/local authority warning following H5N1 detection in a commercial raw pet food product, adding a second jurisdiction to the pattern.
- **Washington State Department of Agriculture — Raw Pet Food Identified as Source of Bird Flu Infection to House Cats** — Documents a Washington state authority action identifying Wild Coast Raw as a commercial product linked to H5N1, extending the pattern to a third brand and a second state.
- **Washington State Department of Health — Food Recalls and Safety Alerts** — Confirms Washington's independent public health authority also recorded and communicated the commercial raw pet food H5N1 event, demonstrating multi-agency state-level engagement.

SIGNAL 3 OF 7

Four separate 2026 recalls across three nutrient categories — thiamine, vitamin D, and multiple micronutrients — signal that nutrient formulation and process controls are an active, multi-product recall driver, not a one-off event

MEDIUM **Short-term (3–12 months)** · Enforcement & Compliance Signals · **Review**

Recalls involving thiamine deficiency, vitamin D variability, and multiple micronutrient shortfalls across four different brands and product types in 2026 indicate that nutrient-control failures are a recurring, category-spanning hazard that FDA has been acting on, and that food-safety plans may be systematically failing to treat nutrient delivery as a hazard requiring a preventive control.

REASONING

The findings document four distinct 2026 nutrient-related recall events across different manufacturers: Steve's Real Food (thiamine, June 8), Quest cat food (thiamine, March 2026 advisory), Breeder's Edge and Shelter's Choice (vitamin D variability, June 25), and Revival Animal Health (potassium, copper, folic acid, choline, and/or vitamin B6, August 26). The fact that two separate thiamine events occurred for different brands — Steve's Real Food (freeze-dried) and Quest (cat food) — within the same year is the most pointed element of the pattern, because thiamine deficiency in cats is a life-threatening neurological hazard that FDA has historically treated as a serious safety failure. Vitamin D variability adds a second nutrient category, and Revival Animal Health's multi-nutrient shortfall in feline milk replacers adds a third. Four events across three nutrient categories and multiple product formats, all within one calendar year, is a pattern, not coincidence. However, the underlying Form 483s and Part 507 citations are not available in the current findings, which prevents confirming whether nutrient hazards appear as a recurring cited deficiency in inspections and prevents assigning a higher confidence score.

PATTERN

Steve's Real Food freeze-dried chicken cat and dog food recalled for potentially low thiamine levels on June 8, 2026. FDA issued an advisory on March 13, 2026, concerning Quest cat food lots with extremely low thiamine levels. Breeder's Edge and Shelter's Choice canine milk replacers recalled for variable vitamin D levels on June 25, 2026. Revival Animal Health feline milk replacers recalled on August 26, 2026, for low potassium, copper, folic acid, choline, and/or vitamin B6. These events appear in FDA's published 2026 recall and advisory index based on the available sources.

IMPLICATION

Facilities making freeze-dried, raw, or liquid/milk-replacer products — categories where nutrient bioavailability and batch-to-batch consistency are hardest to control — should treat nutrient formulation as an active inspection focus in 2026–2027. A food-safety plan that identifies biological and chemical hazards but does not specifically address nutrient over- or under-delivery (including thiamine and vitamin D for cat and dog diets) may be deficient under Part 507.33 given the current recall pattern. Suppliers of premix ingredients are also implicated — supplier verification for nutrient content, not just pathogen status, is a foreseeable inspector question.

RECOMMENDED ACTION

Review hazard analyses for each product formulation to confirm that nutrient excess and deficiency are evaluated as hazards requiring preventive controls; verify that supplier certificates of analysis for vitamin and mineral premixes are part of the supplier verification program; and for freeze-dried or raw products, confirm that validated nutrient-retention data support the guaranteed analysis on the label.

SOURCES & WHAT THEY SIGNAL

- **FDA Animal Veterinary Recalls and Withdrawals** — Lists nutrient-related 2026 pet food recall events — thiamine (Steve's Real Food), vitamin D (Breeder's Edge/Shelter's Choice), and multiple micronutrients (Revival Animal Health) — as documented FDA actions within one calendar year, based on available public sources.
- **FDA Animal Veterinary Outbreaks and Advisories** — Lists the March 13, 2026 FDA advisory for Quest cat food lots with extremely low thiamine levels, adding a second independent thiamine event from a different brand and confirming FDA's advisory-level engagement with the hazard.

SIGNAL 4 OF 7

Washington and Kentucky have enacted AAFCO Pet Food Label Modernization rules with 2030 deadlines while Pennsylvania treats them as voluntary — six states adopted, twelve more planned — signaling a rapidly fragmenting multi-state label compliance environment

MEDIUM **Short-term (3–12 months)** · Regulatory Agency Actions · **Review**

State-by-state AAFCO Pet Food Label Modernization adoption is producing materially different compliance obligations across states simultaneously: Washington prohibits hybrid labels now, Kentucky has mandated the new format by 2030 under final regulations, and Pennsylvania treats the new format as entirely optional — meaning multi-state distributors face multiple label standards with no single nationwide deadline.

REASONING

This watch targets state-by-state AAFCO label adoption and deadline movement as a primary tracking area. The findings provide direct, source-cited state agency positions for three states: Washington (rules effective July 7, 2025, hybrid labels prohibited, June 2030 outside compliance date, confirmed by both the WSDA agency page and the published rulemaking notice), Kentucky (rules approved January 13, 2026, filed January 15, 2026, 2030 manufacturer transition deadline established in administrative regulation), and Pennsylvania (PFLM not legally required, voluntary only, per the state agency page updated September 22, 2026). The AAFCO midyear 2026 agenda book states six states had adopted and twelve more planned to do so in 2025 or 2026. The significance is not any single state action but the divergence: a facility distributing in both Washington and Pennsylvania must maintain two label systems, and a facility planning a single PFLM-compliant label rollout may face compliance in some states while remaining under the legacy system in others. Washington's 'no hybrid labels' rule is immediately operational for any product currently distributed there, making this the most urgent near-term pressure point.

PATTERN

Washington WSDA reports PFLM-related updates effective July 7, 2025, with hybrid labels prohibited and a June 2030 outside compliance date. Washington rulemaking notice WSR 25-09-024 confirms adopted label requirements and the six-year discretionary enforcement period. Kentucky Title 012, Chapter 3, Regulation 039, approved January 13, 2026, establishes a 2030 transition deadline for manufacturers. Related Kentucky regulations 022 and 032 confirm manufacturer obligations under the new format [54, 61]. Pennsylvania Department of Agriculture states PFLM is not legally required and accepts use only voluntarily, per page updated September 22, 2026. AAFCO's 2026 midyear agenda book states six states had adopted the rulemaking process, with twelve more planning adoption in 2025 or 2026. AAFCO's PFLM page confirms that each state has its own rulemaking process and recommends a six-year transition period.

IMPLICATION

A multi-state pet food distributor cannot use a single label strategy for the remainder of the decade. Washington is the most immediate operational constraint: any product shipped there must use either a fully

legacy-compliant or a fully PFLM-compliant label — no mixing of elements from both formats is permitted. With twelve additional states expected to complete adoption processes in 2025 or 2026 and all of them potentially reaching the same 2030 outside deadline, the inventory and label-change planning window is compressing. Facilities that delay PFLM transition planning until a second state enforces the deadline will face simultaneous reformatting obligations across multiple state markets.

RECOMMENDED ACTION

Map current distribution against the six confirmed-adoption states and the twelve states expected to complete adoption in 2025–2026; for Washington-distributed products, immediately confirm that labels are either fully legacy or fully PFLM-compliant with no hybrid elements; begin a label transition project timeline working backward from a 2029 completion target to allow for state registration review cycles.

SOURCES & WHAT THEY SIGNAL

- **Kentucky Administrative Regulations Title 012, Chapter 3, Regulation 039** — Establishes Kentucky's formally approved regulation requiring manufacturer transition to the PFLM label format by 2030, effective January 2026.
- **Washington State Department of Agriculture — Animal Feed Program** — Confirms PFLM updates effective July 7, 2025, that hybrid labels are not accepted, and that a June 2030 outside compliance date applies in Washington.
- **Pennsylvania Department of Agriculture — Pet Food and Animal Feed** — Confirms Pennsylvania's position that PFLM is not legally required, establishing the clearest example of non-mandatory adoption and the divergence from Washington and Kentucky.
- **AAFCO — Pet Food Label Modernization** — Confirms that each state must undertake its own rulemaking and that AAFCO recommends a six-year transition period, establishing why there is no uniform national compliance date.
- **AAFCO 2026 Midyear Meeting Agenda Book** — States that six states had adopted the rulemaking process and twelve planned to do so in 2025 or 2026, establishing the broader scale of imminent multi-state adoption.
- **Washington Rulemaking Notice WSR 25-09-024** — Provides the primary rulemaking instrument confirming Washington's adopted PFLM-related label requirements and the six-year discretionary enforcement period.
- **Kentucky Administrative Regulations Title 012, Chapter 3, Regulation 022** — Corroborates the Kentucky manufacturer label-transition obligation under the 2030 deadline.
- **Kentucky Administrative Regulations Title 012, Chapter 3, Regulation 032** — Provides additional Kentucky regulatory context for the 2030 PFLM transition requirement.

SIGNAL 5 OF 7

FDA's proposed rule requiring mandatory GRAS notices, completed program evaluation, and continuing AFIC process create a transition moment in ingredient approval that will affect how new and reformulated pet food ingredients reach lawful commerce

MEDIUM **Short-term (3–12 months)** · Regulatory Agency Actions · **Review**

Within six weeks in August–September 2026, FDA completed its evaluation of the FAP and GRAS Notification programs, published a proposed rule that would make GRAS notices mandatory and define AFIC-reviewed and AAFCO-defined ingredients as conditional exceptions, and updated the AFIC inventory — together signaling that the current voluntary-consultation era is approaching a formal close.

REASONING

Three distinct FDA actions within the monitoring window converge on the same regulatory change vector. First, FDA formally completed its evaluation of the FAP and GRAS Notification programs on September 22, 2026, and announced improvement initiatives and a published GRAS-evaluation timeline policy. Second, on August 10, 2026, FDA published a proposed rule in the Federal Register that would require mandatory GRAS notice submissions for substances claimed to be GRAS, with specific carve-outs for AFIC-reviewed uses and AAFCO-defined ingredients listed in the 2024 AAFCO Official Publication. Third, the AFIC inventory shows a September 11, 2026 entry, confirming the consultation process was active during the monitoring period, and the AFIC guidance (GFI #294) notes the expiration of the FDA-AAFCO MOU on October 1, 2024, as background. Together, these three events — a completed program evaluation, a proposed mandatory-notice rule, and an active interim consultation inventory — describe a system in deliberate transition. The proposed rule is not final and carries no compliance date yet, which constrains the confidence score. But the proposed rule's carve-out for AAFCO-defined ingredients (specifically Chapter 6 of the 2024 AAFCO Official Publication) is a material detail for formulation decisions being made today.

PATTERN

FDA announced completion of its evaluation of the FAP and GRAS Notification programs and published improvement initiatives including CVM Program Policy and Procedures Manual 1244.3425 on September 22, 2026. FDA published a proposed rule on August 10, 2026, in the Federal Register requiring mandatory GRAS notice submissions, with exceptions for AFIC-reviewed uses where FDA expressed no concerns and for uses consistent with AAFCO-defined ingredients in the 2024 AAFCO Official Publication. FDA's current AFIC inventory shows an entry dated September 11, 2026, confirming ongoing consultation activity. FDA's GFI #294 identifies the October 1, 2024 expiration of the FDA-AAFCO MOU as the backdrop for the current interim AFIC process. FDA's plan-for-consultations page confirms AFIC remains available as an interim consultation route for firms developing animal-food ingredients.

IMPLICATION

Facilities developing new ingredients, adding novel protein sources, or reformulating products that rely on unstated GRAS claims need to act before the proposed rule is finalized. If the rule is finalized as proposed, an

ingredient in use without an AFIC-reviewed completion or a GRAS notice will lack the safe-harbor protections the proposed rule describes. The AAFCO-defined-ingredient exception (Chapter 6 of the 2024 AAFCO Official Publication) means that ingredients already listed there are lower-risk under the proposal — but ingredients not yet listed face the highest exposure. The public comment window on the proposed rule is a live opportunity to shape the final carve-out language.

RECOMMENDED ACTION

Audit all ingredients in current use or in formulation development against Chapter 6 of the 2024 AAFCO Official Publication and the AFIC inventory; for any ingredient that is neither AAFCO-defined nor AFIC-reviewed, initiate an AFIC pre-submission consultation with FDA (contact details available at fda.gov/animal-veterinary/animal-foods-feeds/evaluation-fda-pre-market-animal-food-programs-and-plan-consultations) before the proposed GRAS-notice rule closes for comment, and track the Federal Register docket for the comment deadline.

SOURCES & WHAT THEY SIGNAL

- **FDA Evaluation of FDA Pre-market Animal Food Programs and Plan for Consultations** — Confirms AFIC remains an active interim process and establishes that the consultation pathway is open during the transition period.
- **FDA Current Animal Food Ingredient Consultation Inventory** — Confirms a September 11, 2026 AFIC inventory entry, establishing that the consultation process was active during the monitoring period and that completion of an AFIC consultation generates a public record.
- **Federal Register — Proposed Rule Concerning GRAS Notices (2026-16296)** — Contains the August 10, 2026 proposed rule text requiring mandatory GRAS notice submissions, with the AFIC-reviewed and AAFCO-2024-Official-Publication carve-outs that define the scope of the future obligation.
- **FDA Concludes Evaluation of Pre-market Animal Food Ingredient Review Programs and Shares Vision for Future** — Confirms FDA's September 22, 2026 completion of the program evaluation and announcement of improvement initiatives including a published GRAS-evaluation timeline policy, marking the formal end of the review phase.
- **FDA CVM GFI #294: Animal Food Ingredient Consultation** — Establishes the AFIC framework's basis in the October 1, 2024 MOU expiration and describes AFIC as the current interim consultation mechanism, contextualizing the transition the proposed rule would complete.

SIGNAL 6 OF 7

FDA's parallel active import alerts covering Salmonella in all animal food and FSVP noncompliance, both active as of August–September 2026, converge with a hard October–December facility registration renewal deadline to create three simultaneous border and distribution risks

HIGH **Immediate (0–3 months)** · Enforcement & Compliance Signals · **Review**

Import Alert 71-04 (Salmonella, expressly including pet treats, updated August 31, 2026), Import Alert 99-41 (FSVP noncompliance, listed in FDA's import alert index), and the October 1–December 31, 2026 facility registration renewal window are three independently enforced FDA mechanisms that, if missed simultaneously, can block product at the border or render a facility ineligible to distribute — all within the immediate 0-to-3-month window.

REASONING

All three mechanisms are confirmed by direct FDA source pages. Import Alert 71-04 covers detention without physical examination of all animal food — the alert text expressly names pet treats — for Salmonella contamination, and states that pet food contaminated with Salmonella is adulterated when no subsequent commercial heat step will kill it. Import Alert 99-41 covers FSVP-noncompliant importers of human and animal foods and appears in FDA's import alert index; the precise update date for this alert could not be confirmed from available sources and should be verified directly at the FDA import alert index. FDA's registration renewal reminder states domestic and foreign food facilities must renew between October 1 and December 31, 2026, and that failure to renew renders the registration expired. The convergence of these three mechanisms within a single quarter is the signal: a facility or importer that is managing only one of the three while missing the other two faces compounding exposure. The confidence score is high because all three are confirmed, current FDA policy with direct source citations; the only gap is that the findings do not establish which specific companies were newly added to import alert Red Lists.

PATTERN

Import Alert 71-04 covers detention without physical examination of all animal food including pet treats for Salmonella; alert expressly states pet treats previously under Import Alert 72-03 were moved to the Red List under 71-04; dated August 31, 2026. Import Alert 99-41 covers FSVP-noncompliant importers of human and animal food and is listed in FDA's import alert index; its most recent update date should be confirmed directly from that index. FDA import alert index confirms both alerts as currently active FDA import-control instruments. FDA reminder confirms the biennial facility registration renewal window runs October 1–December 31, 2026, and that failure to renew by December 31 results in an expired registration. FDA animal food facility registration FAQ confirms the renewal requirement applies to animal food facilities. Import Alert 71-02 additionally covers animal food and ingredients containing animal-origin material and requires USDA import permit or veterinary health certificate documentation.

IMPLICATION

Pet food importers and co-packers receiving imported ingredients face a three-track compliance check this quarter: (1) confirm no product or supplier is on the Import Alert 71-04 Salmonella Red List and that pathogen testing records are current; (2) confirm FSVP records are complete and the importer identity in FDA records matches current business arrangements, to avoid Import Alert 99-41 detention; and (3) complete facility registration renewal through the Industry Systems portal before December 31. A facility that allows its registration to lapse cannot lawfully distribute and may face additional enforcement consequences. Domestic facilities that only manufacture and do not import must still prioritize the registration deadline.

RECOMMENDED ACTION

Before October 1: log into the FDA Industry Systems account, verify that registration information is current and the account has authorized access, and schedule the renewal submission for the first two weeks of October to avoid year-end processing delays; simultaneously, pull the current Red List entries for Import Alert 71-04 and confirm no current supplier or product entry appears. Also verify the current status and update date of Import Alert 99-41 directly at the FDA import alert index.

SOURCES & WHAT THEY SIGNAL

- **FDA Reminds Food Facilities of Biennial Renewal Requirements** — Confirms the October 1–December 31, 2026 registration renewal window and states that failure to renew by December 31 results in an expired registration, establishing the immediate administrative deadline.
- **Animal Food Facility Registration and Qualified Facility Attestation Frequently Asked Questions** — Confirms the renewal requirement applies specifically to animal food facilities, closing any ambiguity about whether the biennial renewal obligation reaches pet food manufacturers.
- **FDA Import Alert 71-04 — Detention Without Physical Examination of Animal Food Because of Salmonella** — Confirms active Salmonella detention-without-examination authority covering all animal food expressly including pet treats, with an August 31, 2026 publication date, and notes that pet treats from 72-03 were moved to this alert's Red List.
- **FDA Import Alert 71-02 — Detention Without Physical Examination of Animal Foods and Ingredients Containing Animal-Origin Material** — Establishes a third active import alert applicable to imported pet food and ingredients containing animal-origin material, requiring USDA permit or veterinary health certificate documentation.
- **FDA Import Alerts by Publish Date** — Corroborates the August 31, 2026 update date for Import Alert 71-04 and confirms both Import Alert 71-04 and 99-41 are currently active FDA import-control instruments; the update date for 99-41 should be confirmed here directly.
- **FDA Import Alert 99-41 — Detention Without Physical Examination of FSVP-Noncompliant Importers** — Confirms active FSVP-noncompliance detention authority covering animal food importers; the precise most-recent update date should be verified directly at the FDA import alert index.

SIGNAL 7 OF 7

H.R. 8646 passed the House with pet food ingredient and labeling provisions on June 4, 2026, while H.R. 597 remains stalled in committee — federal legislative movement is real but not yet enacted, and the gap between House passage and Senate action is the current risk window

MEDIUM **Short-term (3–12 months)** · Legislative & Statutory Activity · **Verified**

The House has passed FY2027 appropriations text containing animal-food ingredient definitions and pet food labeling provisions that parallel the PURR Act's goals, but the Senate has not acted, and H.R. 597 itself has not advanced beyond committee referral — meaning federal preemption of state label requirements and a GRAS presumption for AAFCO-listed ingredients are in the legislative pipeline but create no current compliance obligation.

REASONING

This watch treats final enactment or removal of PURR Act language as a review trigger, and the findings document meaningful forward movement without enactment. H.R. 8646 was passed by the House on June 4, 2026, and received by the Senate on June 8, 2026, making it the furthest-advanced vehicle for pet food legislative reform in the current Congress. The House-reported text contains proposed amendments to the Federal Food, Drug, and Cosmetic Act defining 'animal food' to include pet food and ingredients, and proposed labeling provisions that would affect state label requirements and establish initial FDA guidance based on the 2024 AAFCO Official Publication. H.R. 597 was introduced January 21, 2025, and has not moved beyond committee referral. The confidence score is moderate rather than high because Senate action is unconfirmed in the current findings, conference resolution is unconfirmed, and enactment is unconfirmed — meaning the provisions could be dropped in conference or in a continuing resolution. However, the fact that House-passed appropriations text already contains animal-food provisions means that even if H.R. 597 never moves, its policy goals may travel through the appropriations vehicle.

PATTERN

H.R. 597 (PURR Act) introduced January 21, 2025, referred to House Committee on Energy and Commerce; no further action in available congressional record. H.R. 597 text would establish CVM as primary pet food authority, restrict state labeling requirements, provide GRAS presumption for AAFCO-listed ingredients, and require 90-day FDA action on ingredient submissions. H.R. 8646 passed the House June 4, 2026, received by Senate June 8, 2026. H.R. 8646 House-reported text contains proposed amendments defining 'animal food' to include pet food, raw materials, and ingredients, and pet food labeling provisions referencing the 2024 AAFCO Official Publication.

IMPLICATION

The PURR Act's core provisions — federal preemption of state pet food label requirements, a GRAS presumption for AAFCO-listed ingredients, and expedited FDA ingredient review timelines — are now alive in a House-passed appropriations vehicle, not just a standalone bill. If enacted through H.R. 8646 or a subsequent omnibus, these would materially change the state-label compliance landscape (reducing the risk

from the fragmented AAFCO PFLM adoption picture) and reduce the urgency of AFIC consultations for AAFCO-listed ingredients. Facilities should not act on these provisions as operative law today, but should monitor Senate floor action and any conference report language closely.

RECOMMENDED ACTION

Assign someone to track the Senate's action on H.R. 8646 and any companion appropriations bill for the animal-food provisions — specifically whether the pet food labeling and GRAS-presumption language survives conference; flag for legal review immediately if the provisions appear in a conference report or a continuing resolution.

SOURCES & WHAT THEY SIGNAL

- **Congress.gov — H.R. 597, Bill Text** — Provides the introduced text of H.R. 597 confirming the CVM authority, state preemption, AAFCO GRAS presumption, and 90-day review provisions that would apply if enacted.
- **Congress.gov — H.R. 597, Pet Food Uniform Regulatory Reform Act of 2025, All Information** — Confirms H.R. 597 was introduced January 21, 2025, and referred to committee with no further recorded action, establishing the PURR Act's stalled status.
- **Congress.gov — H.R. 8646 Reported Text (XML)** — Contains the House-reported text with the proposed FDCA amendment defining 'animal food,' the pet food labeling provision tied to the 2024 AAFCO Official Publication, and the variable-ingredient labeling provision — the specific legislative language that would create operative changes if enacted.
- **Congress.gov — H.R. 8646** — Confirms H.R. 8646 passed the House June 4, 2026, and was received by the Senate June 8, 2026, establishing the House-passed vehicle's status in the legislative process.

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