

ADVISORY COMMITTEE ON ANIMAL FEEDINGSTUFFS

79th Meeting of ACAF on 27 June 2019

Discussion paper

Raw Pet Food

ACAF Secretariat/Scott Reaney/Stephen Wyllie

June 2019

ACAF Paper on Raw Pet food

ISSUE

1. To seek the Committee's views on the guidance document that highlights the risks of raw pet food in terms of sourcing, production, transport, storage, handling and use and how risks can be minimised.

BACKGROUND

2. During 2018 the Committee explored microbiological testing issues relating to raw pet food. As part of its investigation, the Committee received presentations at its February and June meetings which included details of the number of feed incidents associated with raw pet food and action taken by industry, including development of a guidance document for manufacturers. The Committee was also informed of action being taken by government departments which included the FSA setting up a cross-governmental 'Pet Food Control Group', which shares information and exchanges views, as well as disseminating information to enforcement bodies and other relevant interested parties.

DISCUSSION

3. There have been numerous media and academic reports focusing on raw pet food products and the potential health risks to both animals and humans, especially due to the close proximity to food and food preparation areas within household environments.
4. Members and others in attendance at both the February and June 2018 meetings raised several points (See ACAF Paper 19/02).
5. Following a recommendation from the Committee, the ACMSF and ACAF Secretariats, together with Scott Reaney from the APHA worked together in preparing a guide. The guide was presented to the Committee at its June 2018 meeting and Members provided suggestions for improvement.
6. At the Committee's February 2019 Members were invited to comment on a further draft of the guide. Some Members continued to have concerns on the lack of comprehensiveness of the guidance document, which it was agreed would be further pursued.

7. The APHA intends to publish the guidelines at Annex A as soon as possible.
8. A further revision of the guide can be found at Annex A which takes on board many of the suggestions made by the Committee.

ACTION BY COMMITTEE

9. The Committee is invited to provide its final comments on the paper at Annex A.

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Raw Pet-food

Best Practice Guidance

Introduction

Raw pet food typically consists of meat and/or offal that have not been cooked and therefore could contain bacteria such as *Salmonella*, *Campylobacter*, *Listeria monocytogenes* and Shiga-toxin producing *E.coli* (STEC). These bacteria can cause serious illness in humans and in certain cases pets.

Production and sale of raw pet food is controlled by the Animal By-Products (ABP) and Feed Hygiene regulations. Further details of the legal requirements can be found at the links below:

<https://www.gov.uk/government/collections/guidance-for-the-animal-by-product-industry>

<https://www.food.gov.uk/business-guidance/animal-feed-legislation>

In addition to the legal requirements, there are a number of best practice measures that raw pet food manufacturers can employ, so as to minimise the risks associated with the productions and distribution of raw products.

The following guidance highlights some of the best practice measures and legislative requirements that will help to minimise the risks associated with the production and use of a raw product.

Sourcing of Raw Materials

- Without a traditional microbiological kill step, raw pet food is heavily reliant on the microbiological status of the raw materials used in the production process, in order to meet regulatory testing requirements.
- It is important to note that using only materials intended for human consumption does not guarantee that microbiological standards for raw pet foods will be achieved.
- The sourcing of high quality raw materials is a vital step in achieving a 'safer' and legally compliant product.
- The ABP Regulation requires operators to carry out safe sourcing. Safe sourcing means using material that:
 - does not present unacceptable risks to public or animal health;
 - has been collected, transported or brought from the point of import to the pet food production site, under conditions minimising risks to public and animal health (i.e. at appropriate temperature and in appropriate conditions).
- Safer sourcing can be achieved through rigorous supplier assurance. It is necessary to develop a good supplier relationship in which there is a shared understanding of product requirements. It is advisable to regularly audit suppliers in order to gain confidence in a suppliers' ability to consistently deliver high quality and safe raw materials.
- The final step is to monitor the quality of supply on an ongoing basis.

Microbiological Testing

- The Animal By-Products regulations require producers of raw pet food to test products for the presence of Salmonella and Enterobacteriaceae.
- Random samples must be collected from raw pet food during production and/or during storage (before dispatch) to verify compliance with the standards set out in Annex XIII of EU142/2011.
- There is no requirement under the ABP regulation to test for other bacterial species. However, it is best practice for producers of raw pet food to consider, in the context of their HACCP plan, wider microbiological risks associated with the raw materials being used and to carry out additional testing as appropriate.
- Special consideration must be given to Listeria sp. which can continue to grow at refrigeration temperatures and has a low infective dose for pregnant women.

Labelling and Documentation

- In order to move consignments of ABPs, a commercial document is required. This must list the following:
 - A description of the consignment (including designation as 'category 3'), and the quantity
 - The date of transport
 - The address of origin and destination
 - The ABP approval or registration number for the pet food business
 - The signature of the person responsible for the consignment
- Copies of commercial documents must be retained for at least 2 years.
- The mandatory labelling requirements required by law must be written on packaging and labels and be legible and indelible.

Transport

- Meat and offal must be transported up to a maximum temperature of 7°C to avoid spoilage and to minimise bacterial growth.
- Vehicles and/or containers used to transport ABP materials must be covered and leak-proof and the vehicle must be cleaned, disinfected and dried before and after every use.
- Any spills within the vehicle, or during loading/unloading must be cleaned up immediately and the area of the spill disinfected.

Storage

- Unprocessed ABPs and finished product must be stored in such a way as to minimise further bacterial growth.
- Unprocessed ABPs and finished products must be stored separately.
- Materials must be stored to ensure that frozen finished product is always kept between appropriate temperature restrictions to prevent freeze/ thaw cycles which could encourage bacterial growth.

- It is very important that suppliers of raw ingredients, distributors and stockists of finished products are made aware of the required storage temperatures for finished products as designated by the manufacturer.

Users

- Due to the microbiological nature of raw pet food and the related risk, it is vital that specific guidance is given to users of raw pet food which clearly explains the need for safe handling, storage and use of raw products.
- Guidance must be made available on packaging and on company web-sites and should be readily visible for the user.
- As a minimum, guidance must cover:
 - An explanation that the product can present a risk to human health if not handled in accordance with the advice given below.
 - A requirement to thoroughly wash hands with soap and hot water immediately after handling and preparing raw pet food.
 - Cleaning and disinfection of all work surfaces, utensils, storage containers and feeding bowls that have been in contact with raw pet food.
 - Storage of raw pet food in a sealed and leak-proof container in the freezer to reduce further bacterial growth.
 - Defrosting guidance: In an air tight, leak-proof container in the refrigerator.
 - During storage and preparation, raw pet-food must be segregated from food for human consumption.
 - Remove and carefully dispose of any uneaten raw pet food, as soon as your pet has finished eating.
 - Clean and disinfect the pet feeding area as soon as your pet has finished feeding.

Further guidance for users of raw pet food can be found at:

<https://www.gov.uk/guidance/raw-pet-foods-handling-and-preventing-infection>