

PROPOSAL TO ALLOW PET FOOD PRODUCTION IN FOOD ESTABLISHMENTS

CONSULTATION SUMMARY PAGE

Date launched:	27/03/2018	Closing date:	30/05/2018
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Who will this consultation be of most interest to?
 Pet Food Industry / Local Authorities / Food Business Operators (FBO's).

What is the subject of this consultation?
 Proposals to allow, under certain criteria to ensure strict separation, the commercial production of pet food from animal by-products (ABPs) in businesses also producing food for human consumption.

What is the purpose of this consultation?
 To seek views on the proposal to allow commercial production of pet food in businesses also producing food for human consumption under certain conditions including meeting strict separation criteria.

Responses to this consultation should be sent to:

Corporate Support Unit FOOD STANDARDS AGENCY Tel: 0207 276 8083 Email: csulondontransactions@food.gov.uk	Food Standards Agency 7 th Floor Clive House 70 Petty France London SW1H 9EX
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Impact Assessment included?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	We will not be providing an IA at this stage but seeking the views of industry via the consultation exercise
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PROPOSAL FOR PET FOOD PRODUCTION IN FOOD ESTABLISHMENTS

DETAIL OF CONSULTATION

Introduction

A considerable amount of animal by-products (ABPs) generated in meat and food processing establishments is destined for the production of pet food, or similar commodities such as pet treats. Consumer demand for these products has also increased in recent years and both the food and pet food industry have shown an interest in producing pet food in the same establishment where food is processed. The Food Standards Agency (FSA) has considered these proposals and believe that this can be done safely and in compliance with the legislation provided certain provisions are met.

If the commercial production of pet food from ABPs in businesses also producing food for human consumption is carried out then this must always be done under conditions of strict separation in order to remove the risk of cross-contamination with food intended for human consumption. This consultation outlines the proposed degrees of separation, in a proportionate and risk-based manner, based on the nature of the pet food being produced and the origin of the raw materials used.

Legal considerations

Annex IV of Regulation (EC) No.142/2011, containing implementing measures for Regulation (EC) No. 1069/2009 on animal by-products (ABPs) prescribes conditions of strict separation, designed for processing plants located on the same site as slaughterhouses or other establishments approved or registered under Regulations (EC) 852/2004 and 853/2004 respectively.

The FSA view is that the commercial production of pet food from ABPs in businesses also producing food for human consumption is therefore permitted, provided robust separation conditions are in place to avoid the risk of cross-contamination and to ensure the human food chain is not compromised. Discussions have taken place in conjunction with Food Standards Scotland (FSS), who are also consulting on proposals to allow this activity.

Key proposal

- **To allow the commercial production of pet food from animal by-products in businesses also producing food for human consumption under certain conditions and provided some strict separation criteria are met.**

Approval and Enforcement responsibility

Any establishment already operating as a food business and approved by the FSA or registered with the FSA or Local Authority (LA) for producing food for human consumption that also wishes to produce pet food must notify their competent authority before any operation commences.

Any such change will require revision and re-assessment of the HACCP-based food safety management system, as laid out in Article 6 of Regulation (EC) 852/2004, and an assessment of the proposed operations.

The operator must gain approval from the Animal & Plant Health Agency (APHA) as an ABP pet food site, although the approval process would need input from both APHA and FSA. Risk-based inspection and enforcement of the pet food area will be the responsibility of APHA. FSA and APHA staff will coordinate where responsibilities overlap, to make sure that the food production areas are not at risk of contamination by ABP.

The approval of food business establishments to carry out additional operations in relation to the production of pet food will be based on the following criteria that must be met based on the scenarios below.

1.- Production of pet food in approved food establishments

The following conditions must be met for the production of processed pet food, or for the production of raw pet food from ABPs not generated as part of the business' normal operation, in co-located businesses:

- The pet food production area must be physically separated from the slaughterhouse or other establishment. Physical separation can be achieved by locating it in a building that is completely separated from the slaughterhouse or other establishment or, if judged to be sufficient, in a separate area of the same building, for example with floor to ceiling dividing walls.
- The pet food manufacturing area shall have a separate staff entrance, changing facilities, product loading/unloading bays, equipment and facilities from the ones in the food processing area.
- The transfer of raw material from the food processing site into the pet food manufacturing area shall be done without compromising food safety (e.g. using conveyor lines, or closable leak proof containers).
- The pet food production area is to be made from materials and contain equipment, which is easily cleanable, have hand washing facilities and have

dedicated equipment and, where necessary, suitable temperature controlled storage facilities. These facilities are to be exclusively used for the manufacture of pet food.

- Operatives working in the pet food production area must use dedicated protective clothing. These operatives must be a dedicated team working only in the pet food production area for a full work shift.
- There should be designated areas for the receipt and despatch of pet food products and ingredients. Any additional ingredients, solely for use in pet food manufacture, such as, meat flavourings or additives must enter the pet food room via the designated bays. Pet food products must exit via the designated bays and not enter food production, preparation or storage areas.
- Unauthorised persons and animals must not have access to the pet food production area.
- The operator must put in place a Hazard Analysis and Critical Control Point (HACCP) based management system to identify and control critical control points in this process; monitor, check and record the results; and establish a traceability system for each batch dispatched.

2.- Production of raw pet food from ABPs generated on-site

Raw pet food produced from ABPs generated by the food business can be subject to a lesser degree of separation than that described above, provided this does not reduce the pre-existing degree of separation between the food production activities and ABP handling activities of the business. Processes permitted under this scenario include for example (not exclusively): mincing, chopping, mixing, freezing, etc.

Businesses generating ABP as part of their existing practices should have in place suitable measures for the removal of ABPs from the areas of food production, into areas of ABP handling and disposal. The production of raw pet food from these ABPs can be considered part of the ABP handling practices of the business, and should make use of existing safeguards preventing ABP from contaminating the food chain.

The following standards must be observed:

- The pet food production area is to be made from materials and contain equipment, which is easily cleanable, have hand washing facilities and have dedicated equipment and, where necessary, suitable temperature controlled

storage facilities. These facilities are to be exclusively used for the manufacture of pet food. Storage of this pet food must remain separated from food, in separate chillers or freezers.

- Operatives working in the pet food production area must use dedicated protective clothing. These operatives must be a dedicated team working only in the pet food production area for a full work shift.
- No additional ingredients of animal origin may be brought onto the premises for the purpose of pet food production. Any products of non-animal origin (PNOAO) ingredients brought in for this purpose must not present additional risks to the production of food.
- Unauthorised persons and animals must not have access to the pet food production area.
- The operator must put in place a (HACCP) based management system to identify and control critical control points in this process; monitor, check and record the results; and establish a traceability system for each batch dispatched.

3.- Production of pet food from ingredients and in a manner fit for human consumption

Production of pet food solely from material fit for human consumption should be possible, using the same equipment, provided this material is handled as food for human consumption up until the point of packaging and storage, i.e. once the product is packaged as pet food it will need to be handled and stored separately and labelled as pet food. Such a business would need to comply with the requirements laid out below.

- Production of pet food must be carried out at another time or date from food for human consumption.
- The raw materials used must all be considered and treated as fit for human consumption for the entire process.
- Only material that is normally used in the human food manufacturing premises may be used. The raw materials received must be listed.

- The ingredients must be handled and processed in such a way as to maintain their suitability for human consumption until the point of packaging as pet food. Processes such as bone-in mincing, which are not done in the production of food for human consumption, would not be suitable for the shared area protocol in this section (see previous section).
- Once material is packaged as pet food it must be kept separately from food for human consumption and in separate freezers/chillers. Following pet food production there must be a clean down and sanitation of the area and equipment, as laid down by HACCP principles and/or SOPs. The operator must put in place a HACCP-based food and feed safety management system to identify and control critical control points; monitor, check and record the results; and establish a traceability system for each batch dispatched.
- Any compromise of the separation between the separate areas for food and animal food production (ABPs) will require an immediate stop and full clean down of affected areas, whether in the food or ABP areas (or both), before operations can begin again. An investigation into the cause of such an event must be carried out.

Impact on Business and Competent Authority

As part of this consultation exercise, we would welcome comments in respect of any significant cost or benefits you foresee arise from the proposal (whether these can be put into monetary terms or non-monetary terms). In particular:

- Savings on the disposal of product which would otherwise be destined for food waste or transport costs for products sent to pet food manufacturing plants,
- Access to new markets and the value of these,
- The food sector you are in and the type of pet-food you are looking to produce.

Responses

1. **Responses are required by close 30/05/2018.** Please state, in your response, whether you are responding as a private individual or on behalf of an

organisation/company (including details of any stakeholders your organisation represents).

2. To submit a response to this consultation, please complete the consultation questionnaire provided through Survey Monkey at:

<https://www.surveymonkey.co.uk/r/5V95NRH>

WELSH Survey: <https://www.surveymonkey.co.uk/r/MSR26XD>

Or, if you wish to respond to the consultation by email or in writing, please send responses to:

**Corporate Support Unit
Food Standards Agency
7th Floor, Clive House
70 Petty France
London
SW1H 9EX**

Email: csulondontransactions@food.gov.uk

Thank you on behalf of the Food Standards Agency for participating in this public consultation.

Yours sincerely,

Henna Safdar
Meat Hygiene Policy
Food Standards Agency
7th Floor
Clive House
70 Petty France
London SW1H 9EX

Enclosed

Annex A: Standard Consultation Information

Annex B: List of interested parties *see attached*

Annex A: Standard Consultation Information

Publication of personal data and confidentiality of responses

1. In accordance with the FSA principle of openness we shall keep a copy of the completed consultation and responses, to be made available to the public on receipt of a request to the [FSA Consultation Coordinator](#) (020 7276 8308). The FSA will publish a summary of responses, which may include your full name. Disclosure of any other personal data would be made only upon request for the full consultation responses. If you do not want this information to be released, please complete and return the Publication of Personal Data form, which is on the website at <http://www.food.gov.uk/multimedia/worddocs/dataprotection.doc> Return of this form does not mean that we will treat your response to the consultation as confidential, just your personal data.
3. In accordance with the provisions of Freedom of Information Act 2000/Environmental Information Regulations 2004, all information contained in your response may be subject to publication or disclosure. If you consider that some of the information provided in your response should not be disclosed, you should indicate the information concerned, request that it is not disclosed and explain what harm you consider would result from disclosure. The final decision on whether the information should be withheld rests with the FSA. However, we will take into account your views when making this decision.
4. Any automatic confidentiality disclaimer generated by your IT system will not be considered as such a request unless you specifically include a request, with an explanation, in the main text of your response.
5. A list of interested parties to whom this letter is being sent appears in Annex B. Please feel free to pass this document to any other interested parties, or send us their full contact details and we will arrange for a copy to be sent to them direct.
6. A Welsh version of the consultation package can be found at www.food.gov.uk
7. Please contact us if you require this consultation in an alternative format such as Braille or large print.

This consultation has been prepared in accordance with HM Government consultation principles¹.

¹ <http://www.bis.gov.uk/policies/bre/consultation-guidance>

Annex B: List of interested parties

- All Approved Meat Establishments (Red and White)

Industry – Partnership Working Group members. NFMFT, AIMS, BPC, PFMA, HCCMPW, NIMEA

- All UK LAs