

ADVISORY COMMITTEE ON ANIMAL FEEDINGSTUFFS

76th Meeting of ACAF on 28 June 2018

Discussion paper

Raw Pet Food

ACAF Secretariat/Scott Reaney

June 2018

ACAF Paper on Raw Pet food

ISSUE

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

BACKGROUND

2. At the Committee's February 2018 meeting, Members received a presentation on issues relating to raw pet food.

DISCUSSION

3. The Committee was informed of the number of incidents associated with raw pet food. It was also informed of the action being taken by industry, which included the development of a guidance document for manufacturers, with the aim of raising standards across the sector for all raw pet food manufacturers (both PFMA members and non-members). The Committee was also informed of actions being taken by government departments which included the FSA setting up a cross government 'Pet Food Control Group', which shares information and exchanges views, as well as disseminating information to enforcement bodies and other relevant interested parties.
4. There have been numerous media and academic reports focusing on raw pet food products and the potential health risks to both animals and humans.
5. Members and others in attendance raised the following points:
 - acknowledged that raw pet food was a growing sector;
 - raw pet food is a choice made by pet owners (mostly for dogs); although there is anecdotal information on benefits it is essentially the owners choice to buy raw pet food. It was also unknown whether pets had a preference for raw or conventional pet food;
 - the number of raw pet food manufacturers in the UK had risen from 5 in 2013 to 90 in 2017, with a further 23 awaiting approval from the Animal and Plant Health Agency (APHA);

- raw pet food is likely to have a higher microbiological load as there is no kill step during processing;
 - as part of the legislative requirements, testing for *Salmonella* and *Enterobacteriaceae* is required– however, Members questioned why *Listeria* was not part of the testing requirements;
 - raw pet food is generally sold frozen;
 - a sub group of the Advisory Committee on the Microbiological Safety of Food (ACMSF) had, amongst other bodies, discussed the issue and considered the matter a high priority area;
 - the risk to people in the home through inappropriate/unhygienic handling and storage and subsequent cross-contamination of raw pet food was of concern;
 - the FSA, APHA, and the Pet Food Manufacturers' Association are working together to help manufacturers and consumers understand the risks associated with raw pet food;
 - Members agreed that a document should be prepared in consultation with relevant government departments and cleared by ACAF and the ACMSF highlighting the risks of raw pet food, in terms of storage, handling and use and how any risks can be reduced.
6. Following the meeting, the ACMSF and ACAF Secretariats together with Scott Reaney from the APHA have worked together in preparing the guide at Annex A. This takes on board the suggestions made by the Committee.
7. Mark Bond presented a scene-setting paper to the ACMSF at their meeting on 10 May 2018 which outlined the growing number of incidents which the FSA has handled over recent years in respect of microbiological contamination of raw pet food. Dr Bond's paper was contextualised by wider research undertaken by the US Food and Drug Administration and more recently by the University of Utrecht (Netherlands) in 2018. The ACMSF welcomed the paper and following constructive discussion indicated that a guidance document was important for consumers on the handling, preparation and storage of raw pet food. The ACMSF Acting Chair stated that his committee would like to be kept updated on this issue.

ACTION BY COMMITTEE

8. The Committee is invited to provide its comments on the paper at Annex A. The Committee should note that views from the ACMSF and other government departments with an interest in this topic are also being sought.

ACAF Secretariat/Scott Reaney

June 2018

Raw Pet-food

Best Practice Guidance

Introduction

Raw pet food consists of meat and offal that have not been cooked and therefore could contain bacteria such as *Salmonella*, *Campylobacter*, *Listeria* and *E.coli*. These bacteria can cause serious illness in humans.

Production and sale of raw pet food is controlled by the Animal By-Products 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 measure that raw pet food manufacturers can employ so as to minimise the risks associated with the productions and distribution of raw product.

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

1. Sourcing of Raw Materials

- Without a traditional microbiological kill step, raw pet food is wholly 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 good quality and safe raw materials is a vital step in achieving a safe and legally compliant product.
- The ABP Regulation requires operators to carry out safe sourcing. Safe sourcing means using material that:
 - Does not provide unacceptable risks to public or animal health.
 - Has been collected and transported, or brought from the point of import, to the plant under conditions excluding risks to public and animal health i.e. at appropriate temperature and in appropriate conditions.
- Safe-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 supplier's ability to consistently deliver high quality and safe raw materials.

- The final step is to monitor the quality of supply against the defined specification on an ongoing basis.

2. 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 the category e.g. 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 the law must be written on packaging and labels and be legible and indelible.

3. Transport

- Temperature should be kept as low as possible during transport and storage to avoid spoilage and to minimise bacterial growth.
- Meat and offal should be transported at a maximum temperature of 7oC.
- Unprocessed materials which are to be turned into pet food must be transported either chilled or frozen and should be processed within 24hour from collection.
- Vehicles and/or containers used to transport ABP materials must be covered and leak-proof and the vehicle should be cleaned and disinfected and dried before and after every use.
- Any spills within the vehicle, or during loading/unloading should be cleaned up immediately and the area of the spill disinfected.

4. Storage

- Unprocessed ABPs and finished product must be stored in such a way as to minimise further bacterial growth.
- Unprocessed ABPs and finished product must be stored separately.
- Materials should 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 and distributors and stockists of finished products are made aware of, and abide by, the required storage temperatures for finished products.

5. 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 should be made available on packaging and on company web-sites and should be readily visible for the user.
- As a minimum, guidance should cover:

- An explanation that the product can present a risk to human health if not handled in accordance with the advice given below.
- Requirements to thoroughly wash hands 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.
- 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.