

ADVISORY COMMITTEE ON ANIMAL FEEDINGSTUFFS

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Discussion paper

Raw Pet Food

Dr Mark Bond
ACAF Secretariat
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Raw Pet Food

Issue

1. To advise the Committee of issues relating to the manufacture of raw pet food and action being taken to mitigate these.

Background

2. The pet food sector more widely within the UK is represented by the Pet Food Manufacturers Association (PFMA). Information provided by the Animal and Plant Health Agency (APHA) indicates that there are 90 approved raw pet food businesses and a total of 217 approved pet food businesses (all types) approved to use animal by-products. PFMA indicates that 70 of the pet food companies are PFMA members.
3. PFMA membership has included a small number of raw pet food producers; and in recognition of the rapid growth of raw pet food markets in the EU and UK, the PFMA established the Raw Pet Food Group which held its first meeting in August 2015; representing companies across the UK. The PFMA currently has nine companies within their membership which produce raw pet food in the UK. These are likely to be just the largest producers.
4. Latest figures collated by the PFMA indicate that the size of the UK raw pet food market has grown significantly over recent years and is now estimated to be in excess of £100m annually, within a total pet food market of £2.8bn per annum.

Legislation

5. Sale of raw meat for pets is permitted under animal feed and animal by-products legislation. Under animal feed legislation, there is no direct recognition specifically for the control of raw pet food placed on the market, with the most relevant controls as:
 - Article 4 of Regulation (EC) 767/2009 on the placing on the market and use of feed, requires that feed is only placed on the market and used if:
 - 1(a) it is safe; and
 - 1(b) it does not have a direct adverse effect on the environment or animal welfare.
 - 2(a) is sound, genuine, unadulterated, fit for its purpose and of merchantable quality.

6. Under the Animal By-products (ABP) Regulation:
 - raw pet-food production is regulated by the European Animal By-Products regulation (EC1069/2009) with detailed rules in an implementing Regulation (EC 142/2011) and which sets out strict production and monitoring standards.
 - raw pet food producers are subject to strict controls and are approved and inspected by the Animal and Plant Health Agency (APHA) under the above regulations.
 - there is a requirement for regular microbiological testing for *Salmonella* and *Enterobacteriaceae*. Where findings demonstrate microbial levels above those stipulated in the regulation, rapid action is taken to address this non-compliance including recall of product where appropriate.

7. APHA is responsible for approvals of ABP establishments; with the number of businesses increasing over recent years for the manufacture of raw pet food. At the same time, there has been an increase in the frequency of Salmonella failures as recorded under the mandatory requirements for businesses to notify the APHA. The APHA requires producers of raw pet food to carry out detailed investigations and root cause analysis following microbiological failure. Corrective actions including review of production procedures (including safe sourcing), clean down of equipment and premises and disposal of positive batches may be required.

Incidents

8. The FSA is responsible for handling incidents concerning animal feed, including for pet food non-compliances, and the FSA works closely with the APHA/Defra in view of their responsibility for wider ABP controls. Feed business operators also have obligations under Regulation 178/2002 in particular Article 20 which imposes conditions if the operator believes that the feed does not satisfy feed safety requirements.

9. Frequency of raw pet food Incidents (Jan-Dec 2017)

Data includes imports into the UK and exports from UK producers:

Total = 10:

- 8x microbiological;
- 1x physical contamination;
- 1x approvals non-compliance.

Action taken by Industry

10. In recognition of growth of the raw pet food market and the increased PFMA membership of raw pet food producers, the PFMA Raw Pet Food Group initiated the development of Guidelines for the Manufacture of Raw Pet Food. The objective of this initiative was to raise standards across the sector for all raw pet food manufacturers (both PFMA members and non-members). The Guidelines provide a summary of the regulatory requirements and proposed methods of best practice in an accessible easy-to-use format. This sector Guidelines were developed in conjunction with Defra, the APHA, Public Health England (PHE) and the Food Standards Agency (FSA) and the Guidelines for the Manufacture of Raw Pet Food was published 20 September 2017.
11. The PFMA Raw Pet Food Group is now working on strengthening the Guidelines, which will include further guidance for responsible sourcing of raw materials. This group are also investigating the viability of an auditing scheme that would provide 'earned recognition' and help to raise the standards across the sector from sourcing, through to placing on the market. Defra and APHA are providing assistance with this initiative.
12. In addition, the PFMA has also provided guidance, aimed at pet owners, highlighting the requirement for safe handling of raw pet food, in their factsheet entitled Responsible Raw Feeding for Cats and Dogs.

Action taken by FSA and other Government Departments

13. The FSA created the cross-government 'Pet Food Control Group' with its first meeting on 22 May 2017 and continues to liaise in order to share information and exchange ideas. Relevant information will also be disseminated to enforcement bodies and other relevant interested parties.
14. The FSA Incidents Branch is also finalising guidance for notification and handling of raw pet food incidents. This will include establishing lines of communication and respective roles and responsibilities between Government departments and other key players, such as local authorities.
15. This issue has been raised as an emerging issue by the Advisory Committee on the Microbiological Safety of Food (ACMSF) in its recent horizon scanning exercise in January and has also been highlighted as an area where further

research is urgently required by an ACMSF subgroup set up on request by the FSA Board (the fixed term AMR task and finish group).

16. In addition, the expert multi-agency groups of UKZADI¹ and HAIRS²; which include FSA representation, have taken an interest in public health implications of raw pet food and the FSA informs these groups of any new developments.

Media coverage

17. In recent times; and especially over the last year, there have been numerous media and academic reports focusing on raw pet food products and the potential health risks to both animals and humans. As an example, this was highlighted by the recent research undertaken at Utrecht University (Netherlands) on microbiological contamination of raw pet food. In summary, this research identified high levels of bacterial and parasitic contamination in commercial raw pet food products including; *Listeria*, *Salmonella* and *E.coli*, with *E.coli* O157 and AMR strains were also identified (e.g. as reported in The Guardian on 12 January 2018).

Next Steps

18. The FSA is scheduling a further meeting of the cross-government Pet Food Control Group and the FSA will subsequently meet with the PFMA to discuss options looking forward.

Action by Committee

19. The Secretariat would like to welcome observations and views of the Committee on this important issue.

ACAF Secretariat

February 2018

¹ UK Zoonoses, Animal Diseases and Infections Group

² Human animal infections and risk surveillance group