

ADVISORY COMMITTEE ON ANIMAL FEEDINGSTUFFS

78th Meeting of ACAF on 27 February 2019

Discussion paper

Raw Pet Food

ACAF Secretariat/Scott Reaney

February 2019

ACAF Paper on Raw Pet food

ISSUE

1. To seek the Committee's views and agreement to the publication of a 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 including:
 - acknowledging that raw pet food was a growing sector;
 - buying and feeding of raw pet food is a lifestyle choice made by pet owners (mostly for dogs);
 - there was no supporting scientific evidence to support the claims that raw pet food was beneficial compared to conventional pet food;
 - the number of approved raw pet food manufacturers in the UK had risen from 5 in 2013 to 98 in 2018;

- raw pet food is likely to have a higher microbiological load than conventional processed petfood products as there is no kill step during manufacture;
- 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;
- the product is not hazardous in the freezer if adequately packaged but risk may increase during thawing – however, labelling requirements under both the Animal By-products and Marketing and Use Regulations did not specifically require safe handling instructions;
- some pet owners favour the feeding of raw pet food as they consider it is a more natural product. However, there is no formal kill step during the manufacturing process. Freezing will prevent microbial growth but will kill only certain bacteria (e.g. some campylobacters) and freezing cannot be considered a kill step;
- several other committees were looking at the issue, e.g. the Defra Antimicrobial Resistance Coordination (DARC) Group had raised concerns about imports of raw pet food. The Advisory Committee on the Microbiological Safety of Food (ACMSF) had also considered the matter a high priority area for further consideration;
- the risk to people in the home through inappropriate and/or unhygienic handling and storage and subsequent cross-contamination from raw pet food was of concern;
- the FSA, APHA, and the Pet Food Manufacturers' Association (PFMA) are working together to help manufacturers and consumers understand the risks associated with raw pet food. Members were informed that the PFMA had produced a guidance document in association with FSA and APHA/Defra which had been published in September 2017; and
- the ACAF Secretary confirmed that local authorities notify the FSA of incidents associated with raw pet food. Similarly, the APHA receive notifications from local authorities of non-compliance under the animal by-products regulations and will work with them to resolve the issues.

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. A further revision of the guide can be found at Annex A which takes on board many of the suggestions made by the Committee. However, it has not been possible to take on board all of the suggestions due to the absence of a legal basis for some of the proposed changes, but there may be some scope to include some of the more 'best practice' elements in phase 2 of the PFMA guidance.

ACTION BY COMMITTEE

6. The Committee is invited to provide its final comments on the paper at Annex A. The Committee is also requested to agree to the publication of the paper at Annex A.

ACAF Secretariat/Scott Reaney

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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, in order to minimise the risks associated with the production 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.

1. 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 'safe' 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; and
 - 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).
- 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 audit suppliers regularly 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 on an ongoing basis.

2. Labelling and Documentation

- In order to move consignments of ABPs, an accompanying 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; and
 - 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.

3. Transport

- Meat and offal must be transported up to a maximum temperature of 7°C to avoid spoilage and to minimise bacterial growth.
- Materials used for making raw pet food must be transported either chilled or frozen unless they are to be processed within 24 hours from collection.
- Vehicles and/or containers used to transport ABP materials must be covered and leak-proof and they 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.

4. 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.

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 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 preparation, raw pet-food must be kept away from food for human consumption;
- remove and carefully dispose of any uneaten raw pet food, as soon as the pet has finished eating; and
- clean and disinfect the pet feeding area as soon as the 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>

Further guidance for pregnant women:

Food poisoning is unpleasant at any time, but more so when you are pregnant. Guidance to avoid food poisoning during pregnancy should be followed: <https://www.nhs.uk/common-health-questions/pregnancy/how-can-i-avoid-food-poisoning-during-pregnancy/>