

MANUFACTURING YOUR OWN PET FOODS



Please note this guidance is for England only

This guide covers the manufacturing of pet food, with emphasis on the domestic production of pet food and treats in your own home - e.g. home - made dog biscuits.

Before you start manufacturing any pet food please contact your local Trading Standards for advice as feed businesses, including all pet food manufacturers, must not operate without being registered or approved (as appropriate) with their Local Authority. Application forms are available on Staffordshire County Council's Animal Health website - <https://www.staffordshire.gov.uk/business/tradingstandards/animalhealth/feedhygiene/foodhygiene.aspx>, alternatively call 01785 277 875 to request a form which can be sent through the post or emailed to you.

Additionally, EU Regulations require the Animal and Plant Health Agency (APHA) as the competent authority, to approve manufacturers where pet food uses or incorporates products of animal origin - e.g. eggs, meat, milk, butter, honey. This includes premises manufacturing pet food in domestic houses, even if using products of animal origin deemed fit for human consumption. Form ABPR4 should be completed which is available on the Gov.uk website - <https://www.gov.uk/guidance/using-animal-by-products-to-make-pet-food>

For further information and advice please call APHA on 03000 200 301

If you do not intend to use products of animal origin in your pet food you may start production once you are registered but prior to the visit from a Trading Standards officer.

If you are using products of animal origin in your pet food, production **must not** start until you have received your approval from APHA.

What is a pet food ?

A pet food is any product produced by a pet food manufacturer (even if produced in your own home) - whether processed, partially processed or unprocessed - intended to be ingested by pet animals after placing on the market. Usually pet food is in the form of a coarse mix, kibbles / biscuits, or as a wet food in tins or pouches, but also includes, for example, dog cakes and other similar treats, and raw feed (frozen or fresh)

Manufacturing pet food

The pet food industry is highly regulated (see '**Key Legislation**' below), and this legislation applies equally to what can be described as commercial pet food manufacture on an industrial scale and to smaller scale manufacturers, perhaps in a person's private home or small unit.

The main principle of animal feed legislation is to ensure that all animal feed, including pet food, must be produced in hygienic conditions, and that the finished product is safe, is not harmful to animal or human health and is fully traceable. The main pieces of legislation to be considered in the manufacture of pet food, even in your own home, are described below.

Key Legislation

EU Regulation (EC) No 1831/2003 - *laying down requirements for feed hygiene* requires that feed safety and hygiene be considered at all stages of the production of pet food, wherever this may be carried out. The Regulation sets out the operating standards to which **ALL** pet food manufacturers must comply. The Regulation summarises the feed hygiene requirements in terms of :

- facilities and equipment
- personnel
- production
- quality control including **Hazard Analysis and Critical Control Point (HACCP - feed - safety management system)**
- storage and transport
- record keeping, including traceability
- complaints and product recall

All pet food manufacturers must also comply with EU Regulation (EC) No 767/2009 *on the placing on the market and use of feed*. This legislation covers matters such as:

- Safety and marketing requirements. Special regard should be given to the species and type of pet you are manufacturing food for
- Stringent labelling, presentation and packaging requirements, including analytical declarations
- Manufacturer responsibilities

- Substantiation of any claims, including nutritional claims
- Prohibition on the misleading of purchasers
- Prohibition on making medicinal claims

This regulation also covers undesirable circumstances and particular nutritional purposes e.g.

- The maximum levels of various contaminants allowable in pet food (for example, arsenic, lead, dioxins and certain pesticides)
- Certain substances that must not be used in feed

Regulation (EC) No 1831/2003 *on additives for use in animal nutrition* contains provisions for the control of additives in pet food. These controls relate to the additives (including vitamins, colourants, flavourings and binders) authorised for use in animal feed and cover matters such as:

- Categorisation of feed additives
- Authorisation of feed additives
- Labelling and packaging of feed additives
- Provisions relating to an EU register of additives

EU Regulation (EC) No 1069/2009 *laying down health rules as regards animal by-products and derived products not intended for human consumption* relates to animal by-products - e.g. material of animal origin comprising those parts of animal that are either deemed surplus to human consumption or are not normally consumed by people in the UK, and derived from animals inspected and passed as fit for human consumption prior to slaughter. It may also include products of animal origin - e.g. eggs, milk, butter, honey etc.

Animal materials or animal products of this nature, which are not intended for human consumption, are classified as 'animal by-products' (ABP) under this Regulation (usually Category 3 ABP). Such material must be free of any transmissible disease, which therefore excludes material from dying, diseased or disabled animals. Approval by APHA is required for pet food manufacturers using Category 3 ABP. This includes premises manufacturing pet food in domestic houses or small units, whether using meat fit for human consumption or Category 3 ABP.

You must not make pet food using:

- Category 1 or 2 ABP's
- Catering waste
- Material from animals that passed inspection for disease before death but failed inspection after death

Information and guidance on the applicable legislation can be found on the Food Standards Agency website under Animal Feed Legislation.

Local Authority Registration or Approval

EU Regulation (EC) No 183/2005 laying down requirements for feed hygiene requires feed businesses to be approved or registered with their Local Authority, as appropriate, Application forms are available on Staffordshire County Council's Animal Health website - <https://www.staffordshire.gov.uk/business/tradingstandards/animalhealth/feedhygiene/foodhygiene.aspx>, alternatively call 01785 277 875 to request a form which can be sent through the post or emailed to you. This applies to **all** pet food manufacturers, regardless of scale, and they must not operate without such registration / approval.

EU Regulation (EC) No 183/2005 contains various conditions that pet food manufacturers have to comply with. The requirements of annex II of the Regulation which can be found on the Eur-Lex website - <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1467374211646&uri=CELEX:02005R0183-20160423> must be complied with in relation to all pet food manufacture.

Registration with your Local Authority is free, but Approval may incur a fee.

APHA Approval for Products Incorporating Products of Animal Origin

If the manufacture of pet food, even in your own home, includes ingredients from products of animal origin and even if these products are fit for human consumption, e.g. using ingredients bought direct from a supermarket - then APHA approval is required (in addition to Local Authority registration or approval). This arises from the fact that once the decision is made to use human foodstuffs containing products of animal origin in the manufacture of pet food, then this material becomes an ABP. APHA approval as a pet food plant is always required to handle such ABP.

For approval to be granted in, for example, a domestic home, strict separation of the pet food ingredients from food still intended for human consumption must be achieved at all stages of processing, in order to safeguard both human and animal health. Such separation may be achieved by having totally separate facilities - e.g. a dedicated kitchen, work area and storage area - or by strict time separation with a fully documented clean-down programme. Hazards need to be controlled by a documented HACCP plan supplemented by prerequisite programmes.

A requirement of APHA approval is an ongoing microbiological testing regime for salmonella and enterobacteriaceae. This must be completed at a UKAS-accredited laboratory in accordance with ISO 17025 for ABP purposes. Compliant laboratories can be found on the UKAS website.

Further guidance on using animal by-products to make pet food can be found on the Gov.uk website (<https://www.gov.uk/using-animal-by-products-to-make-pet-food>)

Labelling

This guidance covers the labelling of any type of compound or manufactured pet food that is on sale either loose (from bins, hoppers or other retail bulk displays) or in small prepacks you make up yourself by breaking down larger packs.

If you buy in prepacked containers or packages, which you then offer for sale, these should have been labelled already by the manufacturer or supplier.

The pet food must be labelled with the mandatory labelling requirements, this is sometimes referred to as a 'statutory statement'.

A compound pet food is a product comprising a mixture of at least two ingredients (with or without additives), usually in the form of a coarse mix, kibbles / biscuits, or as a wet food in tins or pouches. Due to their origin and edible nature, chews must also be labelled as pet food.

The prime purpose of a label is to facilitate the understanding of the purchaser by giving clear, concise, accurate, true and honest information on the composition, characteristics and use of the product.

- The product label shall conform to all appropriate legislation
- The vocabulary or pictorials used should be easily understandable by the average purchaser
- Further information should be readily available to purchasers on request
- The label should clearly indicate that it is intended for pets
- Any claims referring to the product must: be substantiated, not confuse or mislead purchasers, not denigrate other pet foods or suggest that other pet foods do not possess such characteristics when it is not true

The pet food must be labelled with both the general mandatory labelling requirements and specific mandatory labelling requirements. Free samples of products must also be fully labelled regardless of the fact they are not being sold.

General Mandatory Labelling Requirements

- Type of feed - e.g. 'feed material', 'complete feed', 'complementary feed'. For pets other than cats and dogs the designation 'complete feed' or 'complementary feed' may be replaced by 'compound feed'. The designation 'pet food' is also allowed.
- Name or business name and address of the feed business operator responsible for the labelling.
- Establishment registration or approval number.
- Batch or reference number.
- Net quantity
- List of feed additives, preceded by the heading 'additives'.
- Moisture content if it exceeds 14 %

Specific Mandatory Labelling Requirements

- Species or categories of animals for which the compound feed is intended
- Instructions for proper use indicating the purpose for which the feed is intended, e.g. amount per animal per day, or percentage of total daily ration.
- In cases where the producer is not the person responsible for the labelling, the name and address of the producer or an identification number.
- Minimum storage life 'use before' followed by the date DD/MM/YY for highly perishable feed, 'best before' followed by the date MM/YY for other feed.
- List of feed materials in descending order by weight based on the moisture content under the heading 'Composition'.
- For pet animals, the specific name of a feed material may be replaced by the category name as specified in the table overleaf -

Categories of feed materials which may be indicated in place of individual feed materials as defined in Directive 82/475

Description of the Category	Definition
Meat and animal derivatives	All the fleshy parts of slaughtered warm-blooded land animals, fresh or preserved by appropriate treatment, and all products and derivatives of the processing of the carcass or parts of the carcass of warm blooded land animals
Milk and milk derivatives	All milk products, fresh or preserved by appropriate treatment, and derivatives from the processing thereof
Eggs and egg derivatives	All egg products fresh or preserved by appropriate treatment and derivatives from the processing thereof
Oils and fats	All animal and vegetable oils and fats
Yeasts	All yeasts, the cells of which have been killed and dried
Fish and fish derivatives	Fish or parts of fish, fresh or preserved by appropriate treatment and derivatives from the processing thereof
Cereals	All types of cereals, regardless of their presentation, or products made from the starchy endosperm
Vegetables	All types of vegetables and legumes, fresh or preserved by appropriate treatment
Derivatives of vegetable origin	Derivatives resulting from the treatment of vegetable products, in particular, cereals, vegetables, legumes and oil seeds
Vegetable protein extracts	All products of vegetable origin in which the proteins have been concentrated by an adequate process to contain at least 50% crude protein, as related to dry matter, and which may be restructured (textured)
Minerals	All inorganic substances suitable for animal feed
Various sugars	All types of sugar
Fruit	All types of fruit, fresh or preserved by appropriate treatment
Nuts	All kernels from shells
Seeds	All types of seeds as such or roughly crushed
Algae	Algae, fresh or preserved by appropriate treatment
Molluscs and crustaceans	All types of molluscs, crustaceans, shellfish, fresh or preserved by appropriate treatment, and their processing derivatives
Insects	All types of insects and their stages of development
Bakery products	All bread, cakes, biscuits and pasta products

- If special emphasis is placed on a feed material on the labelling (e.g. by words, pictures or graphics) then the name and percentage weight must be indicated
- Compulsory declarations of crude protein, crude oils and fats, crude fibre and crude ash under the heading 'analytical constituents'
- or without affecting the analysis for pet food the replacement expressions 'protein', 'fat content' and 'incinerated residue' / 'inorganic matter' may be used respectively
- Pet food manufacturers must provide contact details - e.g. a free telephone number for purchasers wishing to obtain information on feed additives and the names of feed materials within a category

The advice contained within this guide dictates the information that must be provided on any pet food labelling. Further optional information may also be provided. A guide to good labelling practice is available from Staffordshire County Council's Animal Health website and this should be consulted as a guide to aid compliance with labelling requirements.

Labelling Presentation

If the pet food arrives in a package or container, the labelling particulars should be included either directly on the container or on a label attached to it (subject to minor exemptions). Where the material arrives in bulk, the information can be supplied in accompanying documentation.

The labelling particulars must be given in a conspicuous, clearly legible and indelible manner and in English (subject to legislation). The particulars must be easily identifiable and not obscured by any other information. The labelling and presentation must not mislead the user as to the nature, method of manufacture, quantity, durability, composition and species of animal for which it is intended.

When selling pet food loose from bins or hoppers the required labelling particulars must be displayed in a conspicuous place (either attached to the bin or with the feed) in such a way that it is clear to which product it relates. In these circumstances the full feed particulars must be provided to the purchaser at the latest on, or with the invoice. This only relates to feed sold loose in quantities not exceeding 20kg and intended for the final user.

For other prepacked goods you must mark each pack with the required labelling particulars. However, for 'multipack' pet food (such as one package with several containers, where the total weight of the package is not more than 10kg) the required labelling only needs to be given on the outer packaging instead of on each container.

Where pet food is sold loose, care must be taken to ensure that any use-before or best-before dates and batch numbers are updated when new stock is added. Consideration must also be given to efficient and effective stock rotation to ensure the accuracy of information given in the statutory statement.

Key Legislation

- **EU Regulation (EC) No 1831/2003** *on additives for use in animal nutrition*
- **EU Regulation (EC) No 1831/2005** *laying down requirements for feed hygiene*
- **EU Regulation (EC) No 767/2009** *on the placing on the market and use of feed*
- **EU Regulation (EC) No 1069/2009** *laying down health rules as regards animal by-products and derived products not intended for human consumption (Animal by-products Regulation)*
- **EU Regulation (EU) No 142/2011** *implementing Regulation (EC) No 1069/2009 and Directive 97/78/EC*
- **Animal By-Products (Enforcement) (England) Regulations 2013**
- **Animal Feed (Composition, Marketing and Use) (England) Regulations 2015**
- **Animal Feed (Hygiene, Sampling etc and Enforcement) (England) Regulations 2015**

Please Note

Failure to comply with these requirements is a criminal offence. The maximum penalty is a fine and two years imprisonment.

This information is intended for guidance, only the courts can give an authoritative interpretation of the law.

NOTES

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the knot unites