BVA AND VPHA CONSULTATION RESPONSE TO FSA PROPOSAL TO ALLOW PET FOOD PRODUCTION IN FOOD ESTABLISHMENTS

1) BVA is the national representative body for the veterinary profession in the United Kingdom and has over 17,000 members. Our primary aim is to represent, support and champion the interests of the veterinary profession in this country, and we therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.

2) The Veterinary Public Health Association (VPHA) is a division of BVA and is committed to the protection of the consumer and the environment as well as to the promotion of animal welfare. VPHA currently has over 300 members many of whom work as Official Veterinarians in slaughterhouses dealing with both public health and animal welfare issues.

3) We welcome the opportunity to comment on the FSA draft proposal to allow commercial production of pet food in businesses also producing food for human consumption. We understand that the initial draft proposal is intended as a basis for discussion and believe that refinement is required in order to ensure clarity within the proposal.

4) General comments
We would welcome further clarity throughout the document on the ‘strict separation criteria’ that the key proposal sets out, particularly for scenario 2 ‘Production of raw pet food from ABPs generated on-site’. Further, the use of examples throughout the document to illustrate each scenario would be particularly useful for the reader.

Below we consider each section of the proposal and highlight areas for further considerations and inclusion.

5) Introduction to the proposal
In order to make the document as useful as possible and to enable prospective businesses to gain an overview of existing requirements, we would welcome additional references to the key requirements that businesses should be aware before undertaking pet food production. For example, requirements for food labelling and microbiological and compositional testing. We would also advise that prospective businesses are a member of the Pet Food Manufacturers’ Association and follow PFMA codes of practice and the FEDIAF (the European Pet Food Manufacturers’ Association) guidance for the manufacture and labelling of safe pet food.

6) Legal considerations
We would support a definition of ‘commercial production of pet food’ within this
section so as to outline what is understood by ‘commercial’ and ‘production’ (as opposed to generation, which is referred to in scenario 2 ‘Production of raw pet food from ABPs generated on-site’). In addition, this section would benefit from the introduction of a scope, for example to state that this proposal excludes sales over the counter to the final consumer.

7) Approval and enforcement responsibility
In this section we would welcome more clarity as to enforcement responsibility after approval has been gained. Clarity in this regard will be paramount to ensure that any non-compliant businesses are swiftly recognised and addressed to safeguard animal and public health.

8) Common requirements across all scenarios:
It would be useful to foreground the cross-cutting common requirements that apply across all scenarios as an overarching section of the proposal. These could include:

- The implementation of a Hazard Analysis and Critical Control Point (HACCP)- based management system
- Segregation, labelling and identification of ABPs from any other product
- Hygiene procedures and Standard Operating Procedures
- Structural and equipment requirements
- Traceability requirements
- Identification requirements
- Staffing requirements

9) Title of scenarios
We consider that the titles of scenarios could be confusing, with scenario 1 entitled ‘Production of pet food in approved food establishments’ and scenario 2 entitled ‘Production of raw pet food from ABPs generated on site’. Both titles appear to refer to similar ‘approved’ premises, yet the only difference between them appears to be a difference in the place of origin of the ABPs (on-site vs. off-site), which could be made clearer in the scenario titles.

10) Consistency of language across scenarios
We note that as the proposal is currently drafted there is an inconsistency of language, with different words being used interchangeably eg. production vs processing and or/production vs generation of ABPs. To establish the origin of ABPs (on-site vs off-site) and ensure the correct understanding of terminology is applied, the proposal should ensure consistency of terminology throughout.

11) Scenario 2 – Production of raw pet food from ABPs generated on-site.
As this scenario is likely to have areas of cross-over, we would welcome further
clarity on the below points:

- The scenario outlines that raw pet food produced from ABPs generated by the food business can be subject to a lesser degree of separation, however does not set any clear limits as to the lesser degree of separation.
- The scenario should include an exhaustive list of processes permitted under this scenario as opposed to the inclusion of a non-exclusive selection of processes as is currently listed.
- Consideration should be given to foregrounding the standard that outlines that no additional ingredients of animal origin may be brought onto the premises for food production, as this is perhaps the most important standard to be aware of within this scenario.

Concerns about raw food

It is important to reiterate that pet owners who choose to feed raw food diets must be aware of the potential public health risks associated with raw meat and how to safely store raw meat.\(^1\) We would advise any owner wanting to try a different diet for their dog to first consult their local vet - to ensure they are meeting their dog’s dietary needs.

A raw food diet is not something that we would recommend making at home, particularly without veterinary guidance, due to the potential for nutritional deficiencies and possible health risks.

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