

Consultation on proposal to allow pet food production in food establishments

Summary of stakeholder responses

21 December 2020

Introduction

This consultation was issued on 27th March 2018 and closed on 31st May 2018.

The consultation sought views on proposals to allow, under certain criteria to ensure strict separation, the commercial production of pet food from animal by-products in businesses also producing food for human consumption.

A considerable amount of animal by-products (ABPs) generated in meat and food processing establishments is destined for the production of pet food, or similar commodities such as pet treats. Demand for these products has also increased in recent years and both the food and pet food industry have shown an interest in producing pet food in the same establishment where food is processed.

The Food Standards Agency (FSA) has considered these proposals and believe that this can be done safely and in compliance with the legislation provided certain provisions are met.

If the commercial production of pet food from ABPs in businesses also producing food for human consumption is carried out, then this must always be done under conditions of strict separation in order to remove the risk of cross-contamination with food intended for human consumption. This consultation outlined the proposed degrees of separation, in a proportionate and risk-based manner, based on the nature of the pet food being produced and the origin of the raw materials used.

The FSA is grateful to those stakeholders who responded and sets out in the table below responses in order of the group responding.

The key proposals on which the consultation sought views were:

- The certain conditions that need to be met to allow commercial production of pet food in businesses also producing food for human consumption.
- Savings on the disposal of product which would otherwise be destined for food waste or transport costs for products sent to pet food manufacturing plants
- Access to new markets and the value of these.

The Food Standards Agency's considered responses to stakeholders' comments are given in the last column of the table. A summary of changes to the original proposal resulting from stakeholder comments with the actions to be implemented is set out at the end of the document.

Summary of substantive comments

Respondent	Comment	Response
Business producing pet food	We welcome this proposal to provide regulation which allows for the production of pet food in businesses also producing food for human consumption. It is reasonable that establishments are considered in 3 different categories of risk, with differing degrees of separation between the pet food and food for human consumption. This is a proportionate risk based approach which allows a lower burden of regulation for businesses producing pet food using human grade ingredients and methods.	Comment noted.
Business producing pet food	We feel that this overall approach could be better tailored to allow low risk production to continue without an additional burden of regulation and the imposition of additional costs	Comment noted. There may be some additional costs in relation to conducting extra sampling and inspection costs. We believe these should not be that onerous to lead to job losses.
Business producing pet food	Our company manufactures a lickable frozen yogurt treat for dogs. As a company we also produce yogurt for human consumption on the same site; our business is registered as a site for dairy production and with the APHA. We employ the equivalent of 3 full time staff to enable the production of our lickable frozen yogurt treat for dogs. Given the continued growth of this line. we expect this to increase to 5 people within the next 12 months. Our lickable frozen yogurt treat for dogs is made from all human grade ingredients, using the same	Comment noted.

Respondent	Comment	Response
	<p>processes to those we use for human yogurts – Therefore this product is entirely fit for human consumption. This product is packed in sealed single serve (85 gram) pots that are of an entirely different design to our other human products.</p>	
<p>Business producing pet food</p>	<p>Our product fits into the third category of product, that is “pet food from ingredients and in a manner fit for human consumption”. As such we do not use animal products which would otherwise be disposed or wasted. We would have difficulty complying with several of the guidelines contained within the proposed regulation, without incurring significant additional cost.</p>	<p>Comment noted. Following responses from the consultation and further internal and external discussions, the FSA has taken the decision to proceed only with one scenario - Manufacturing of pet food in approved/registered food establishments from ingredients that contain products of animal origin (POAO) in a manner as food fit for human consumption.</p>
<p>Business producing pet food</p>	<p>1. “Production of pet food must be carried out at another time or date from food for human consumption”.</p> <p>a. Yogurt Production - Yogurt production takes place in a batched process; pasteurised milk is placed into vats and yogurt cultures are added. It takes 24 hours incubation for this to become yogurt in our process. Typically, several batches produced each day, of which one batch may be our lickable frozen yogurt treat for dogs. This is separately prepared and marked up in the vessels as such as per our HACCP manual. After production of the batch of lickable frozen yogurt treat for dogs, the Vat’s are cleaned down as per HACCP requirements before any other</p>	<p>Comments noted. The reasoning for the production of Pet Food to be carried out another time/date from food for human consumption is to ensure that there is complete separation of the two to avoid cross contamination. In view of the comments received from this consultation, the FSA propose to develop some guidance to detail the conditions and production processes considered acceptable for approval of manufacturing of pet food from POAO or Category 3 ABPs within a food establishment. The guidance will include that batch separation is acceptable, provided the risk of cross-contamination between the food for human consumption and the pet food is managed.</p>

Respondent	Comment	Response
	<p>products are made. We are not sure if this complies with the proposed regulation but we fear that it may not. We feel that this production method poses no additional risk compared to normal dairy production. We would not be able to alter this method as due to the short shelf life of our human yogurts, they are required to be made daily.</p> <p>b. Packaging - Packaging of our lickable frozen yogurt treat for dogs takes place on a separate filling machine from other products and no other products are packed on that line in the same day. Post filling the machine is fully cleaned down as per our HACCP manual.</p>	
Business producing pet food	<p>2. “Only material that is normally used in the human food manufacturing premises may be used.” At present we use 3 ingredients which are not normally used in the Dairy. These are an enzyme to remove Lactose (many dogs are allergic), a vitamin mix & a natural cranberry fruit conserve. All are fit for human consumption & pose no additional risk. We do not understand the purpose of limiting allowed materials to those normally used in the food manufacturing premises – none of the extra ingredients for our lickable frozen yogurt treat for dogs would pose any additional risk if cross contamination were to happen.</p>	<p>Comment noted. We will advise in the proposed guidance that any additional ingredient or packaging intended for the pet food processing must be food grade, and clearly listed and identifiable to ensure they are not accidentally used during the food processing. There must be adequate procedures in place to ensure that any additional food grade packaging or ingredients intended for pet food processing are not used in food processing.</p>

Respondent	Comment	Response
Business producing pet food	3. "Once material is packaged as pet food it must be kept separately from food for human consumption and in separate freezers/chillers." At the Dairy, we have recently had a large extension to increase the size of our chiller, this was partly to ensure we can store all our stock along with the the stock for our lickable frozen yogurt treat for dogs before it is transported to be frozen. There is no other space available to store completed stock. To comply with this proposed regulation it will impose significant additional cost on the business.	Comment noted. We will advise in the proposed guidance that although storage of the pet food manufactured on site must remain separated from food, it is permitted to share the same chillers or freezers, provided all the final products are clearly identified/labelled, completely sealed and leak proof, and there are areas on them permanently marked and clearly designated for food and pet food.
Business producing pet food	In each of the 3 areas described the proposed additional regulation will impose significant additional cost to the production process. As the lickable frozen yogurt treat for dogs is entirely fit for human consumption & clearly labelled we do not believe it poses any additional risk of cross-contamination with the other products produced at the Dairy. These additional costs will threaten the employment of a number of our employees. We are aware of similar products produced in the Republic of Ireland in normal dairy establishments which are not subject to this type of regulation.	Comment noted. Taking into consideration your previous comments, it would appear that all of your concerns will be clarified and resolved with the development of the proposed guidance as previously noted. However, we agree there might be an impact of costs, but this should not be not significant.
Business producing pet food	At the Dairy, we have recently had a successful grant application via the Rural Payments Agency (RPA) for some new filling and production equipment, as part of this application, we have included additional staffing numbers and increased turnover based on our	Comment noted.

Respondent	Comment	Response
	<p>anticipated increase in sales for our lickable frozen yogurt treat for dogs, we are concerned that these proposed regulations will cause us significant problems which may mean we do not meet the required targets set by the RPA, and as such, we may have the grant retracted.</p>	
<p>Business producing pet food</p>	<p>We hope that it will be possible to revise this wording to allow us to continue production in its current form, and ensure the continued success of both businesses in the future.</p>	<p>Comment noted. We will develop the proposed guidance to reflect your views where appropriate.</p>
<p>British Veterinary Association (BVA) and Veterinary Public Health Association (VPHA)</p>	<p>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.</p> <p>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</p>	<p>Comments noted.</p>

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	<p>Veterinarians in slaughterhouses dealing with both public health and animal welfare issues.</p> <p>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.</p>	
<p>British Veterinary Association (BVA) and Veterinary Public Health Association (VPHA)</p>	<p>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.</p> <p>Below we consider each section of the proposal and highlight areas for further considerations and inclusion.</p>	<p>Comment noted. In view of the comments received from this consultation, the FSA propose to develop some guidance to detail the conditions and production processes considered acceptable for approval of manufacturing of pet food from POAO or Category 3 ABPs within a food establishment. We will ensure the guidance clarifies the strict separation criteria.</p>
<p>British Veterinary Association (BVA) and Veterinary Public Health Association (VPHA)</p>	<p>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</p>	<p>Comment noted. We will aim to ensure that the guidance includes additional references for the requirements for food labelling and microbiological testing.</p>

Respondent	Comment	Response
	example, requirements for food labelling and microbiological and compositional testing.	
British Veterinary Association (BVA) and Veterinary Public Health Association (VPHA)	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.	Comment noted. We cannot impose mandatory membership as it is up to the business if they wish to become a member of the PFMA. We will include the links to the PFMA website which contains guidance and best practice.
British Veterinary Association (BVA) and Veterinary Public Health Association (VPHA)	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.	Comment noted. We will aim to ensure that the proposed guidance includes a section on 'Introduction of application and scope' to provide more clarity.
British Veterinary Association (BVA) and Veterinary Public Health Association (VPHA)	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	Comment noted. We will include a section on enforcement in the guidance to provide more clarity in this regard.

Respondent	Comment	Response
Health Association (VPHA)	recognised and addressed to safeguard animal and public health.	
British Veterinary Association (BVA) and Veterinary Public Health Association (VPHA)	<p>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:</p> <p>The implementation of a Hazard Analysis and Critical Control Point (HACCP) - based management system. Segregation, labelling and identification of ABPs from any other product.</p> <p>Hygiene procedures and Standard Operating procedures.</p> <p>Structural and equipment requirements.</p> <p>Traceability requirements.</p> <p>Identification requirements.</p> <p>Staffing requirements.</p>	Comment noted. Following responses from the consultation and further internal and external discussions, the FSA has taken the decision to proceed only with one scenario - Manufacturing of pet food in approved/registered food establishments from ingredients that contain POAO in a manner as food fit for human consumption. However, we will include a section in the guidance on the general requirements for the pet food manufacturing operation.
British Veterinary Association (BVA) and Veterinary Public Health Association (VPHA)	<p>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.</p>	Comment noted. As detailed above, the FSA has taken the decision to proceed only with one scenario - Manufacturing of pet food in approved/registered food establishments from ingredients that contain POAO in a manner as food fit for human consumption which will be reflected in the guidance.

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British Veterinary Association (BVA) and Veterinary Public Health Association (VPHA)	<p>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.</p>	Comment noted. We ensure that there is consistency of language applied throughout the proposed guidance document.
British Veterinary Association (BVA) and Veterinary Public Health Association (VPHA)	<p>Scenario 2 – Production of raw pet food from ABPs generated on-site:</p> <p>As this scenario is likely to have areas of cross-over, we would welcome further clarity on the below points:</p> <p>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.</p> <p>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.</p>	Comment noted. As previously noted, following responses from the consultation and further internal and external discussions, the FSA has taken the decision to proceed only with one scenario - Manufacturing of pet food in approved/registered food establishments from ingredients that contain POAO in a manner as food fit for human consumption.

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	<p>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.</p>	
<p>British Veterinary Association (BVA) and Veterinary Public Health Association (VPHA)</p>	<p>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. 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.</p>	<p>Comment noted. There is separate standalone guidance covering these risks for which we will provide the following link https://www.gov.uk/guidance/raw-pet-foods-handling-and-preventing-infection</p>
<p>Wales Food Expert Safety Panel</p>	<p>This response is made by the All Wales Food Safety Expert Panel. The All Wales Food Safety Expert Panel reports to and provides specialist advice on food safety matters to Welsh Heads of Environmental Health. Welsh Heads of Environmental Health is the collective organisation of the most senior Environmental Health professionals from all 22 Welsh local authorities.</p>	<p>Comment noted.</p>

Respondent	Comment	Response
Wales Food Expert Safety Panel	There is a lack of clarity on what type of business this proposal covers e.g. local butcher, bakeries, pie and ready meal manufacturers. These types of premises also produce animal bi products (ABPs).	Comment noted. This proposal is intended for any FBOs approved or registered by the LA or FSA for producing food for human consumption, who also wish to manufacture pet food from the same premises using products of animal origin or Category 3 ABPs. We will ensure that this is clarified in the proposed guidance.
Wales Food Expert Safety Panel	The document concentrates on hygiene implications. There appears to be a complete lack of consideration for the potential for food fraud in this document. We consider this to be a major omission. Recent scandals such as horse meat contamination, Russell Hulme and Two Sisters have identified major failings in the meat industry resulting in the loss of consumer confidence. The production of pet food in an establishment that produces food for human consumption is a disaster waiting to happen.	Comment noted. Following responses from the consultation and further internal and external discussions, in an effort to reduce the risk of food fraud, the FSA has taken the decision to proceed only with one scenario - Manufacturing of pet food in approved/registered food establishments from ingredients that contain POAO in a manner as food fit for human consumption. In view of the comments received from this consultation, the FSA propose to develop some guidance to detail the conditions and production processes considered acceptable for approval of manufacturing of pet food from POAO or Category 3 ABPs within a food establishment. We will ensure the guidance includes more references to labelling and traceability.
Wales Food Expert Safety Panel	The document needs to be considered in the context of the Regulating our Future (RoF) programme which could result in reduced inspection frequencies and the reliance on third party assurance which will in our view increase the potential for food fraud.	Comment noted. Inspection frequencies are to be aligned to RoF and will be risk-based. Where necessary, the enforcement agencies will give consideration to a joint supervisory visit and work together to determine which authority should take any necessary enforcement action. We

Respondent	Comment	Response
		will ensure this is adequately covered in the proposed guidance document.
Wales Food Expert Safety Panel	With the risks involved in relation to food safety, cross contamination and potential for fraud we do not believe that the practice of producing pet food should take place in any food premises. However if this is to be implemented in accordance with option 1 any establishment wishing to produce pet food would need to be purpose built and most existing businesses would not be suitable to allow for complete separation e.g. separate entrances, loading bays etc.	Comment noted. Following responses from the consultation and further internal and external discussions, the FSA has taken the decision to proceed only with one scenario - Manufacturing of pet food in approved/registered food establishments from ingredients that contain POAO in a manner as food fit for human consumption, as this is considered to be a lower risk option. We consider the advantages of minimising waste, diversifying businesses, and providing consumer choices, outweighs the risk of fraud.
Wales Food Expert Safety Panel	The document states that: - “The operator must gain approval from the Animal & Plant Health Agency (APHA) as an ABP pet food site, although the approval process would need input from both APHA and FSA. Risk-based inspection and enforcement of the pet food area will be the responsibility of APHA. FSA and APHA staff will coordinate where responsibilities overlap, to make sure that the food production areas are not at risk of contamination by ABP”. There is no mention of LA enforcement and the proposed number of enforcement bodies involved in one premise is going to make things unnecessarily complex.	Comment noted. APHA is responsible for the approval of pet food sites. Enforcement is either delegated to the FSA or LAs depending on the location of the establishment. We will update the guidance to include a section on enforcement responsibilities for clarification. However, APHA, FSA and LA's commonly work in the same space to approve ABP sites and communication between the regulatory bodies already happens at a local level with no issues.

Respondent	Comment	Response
Wales Food Expert Safety Panel	We reject the proposal for the lesser degree of separation under option 2 because we feel this would increase the potential for cross contamination and food fraud though the re-working products.	Comment noted. Following responses from the consultation and further internal and external discussions, to reduce the risk of food fraud and cross contamination, the FSA has taken the decision to proceed only with one scenario - Manufacturing of pet food in approved/registered food establishments from ingredients that contain POAO in a manner as food fit for human consumption.
Wales Food Expert Safety Panel	We reject the proposal in scenario 3 “the production of pet food from ingredients and in a manner for human consumption which allows the use of the same equipment for pet food and food for human consumption”. This increases the potential for food fraud. Furthermore, the dual use of equipment would allow for cross contamination and introduction of contaminants. Mincers and mixers could be considered as complex pieces of equipment and cannot be easily cleaned between uses.	Comment noted. As advised above, the FSA has taken the decision to proceed only with one scenario - Manufacturing of pet food in approved/registered food establishments from ingredients that contain POAO in a manner as food fit for human consumption. In view of this, the risk to public health is considered very low.
Wales Food Expert Safety Panel	Consideration needs to be given to the import of ABPs from other countries which are known to be contaminated with pathogenic organisms which have been linked to cases of human illness from raw pet foods.	Comment noted. Given that the FSA will now proceed only with the scenario of manufacturing of pet food in approved/registered food establishments from ingredients that contain POAO in a manner as food fit for human consumption, the import of ABP’s would not be applicable.

Respondent	Comment	Response
Wales Food Expert Safety Panel	There is no impact assessment for this consultation on the grounds that the agency will not be providing an IA at this stage but seeking views of industry via the consultation exercise. An IA is required as this proposal will impact on LAs not just industry. The implication of resources does not appear to have been fully considered with regards to enforcement. In addition there is likely to be an increased burden on businesses for official controls from different enforcement bodies.	Comments noted. The majority of these businesses are already well established and operating the safe production of food for human consumption. This means that they would already be regularly inspected by the relevant authority, so we do not consider the extension of the activities covered by this proposal to increase the burden of the LA's or the businesses involved.
Wales Food Expert Safety Panel	To assist in the identification and investigation of potential fraudulent practices an extension to the traceability requirements contained in General Food Law 178/2002 should be considered in co-located food / pet food production plants to include detailed internal traceability requirements.	Comment noted. We will ensure that references to traceability and labelling are made clear in the proposed guidance.
FABRA – Foodchain & Biomass Renewables Association	On a general point this proposal is of some concern to our members in the ABP processing / rendering sector, as depending on the scale of uptake, it may have an impact on the availability of category 3 raw material. This could subsequently influence raw material and derived product prices and potentially could affect the pet food market for our member's products.	Comment noted. Given that the FSA will now proceed only with the scenario of manufacturing of pet food in approved/registered food establishments from ingredients that contain POAO in a manner as food fit for human consumption, it is unlikely to have an impact on the availability of category 3 raw material.
FABRA – Foodchain & Biomass	The ABP Regulations already allow for Cat 3 material to be handled at a food premises and undergo some processing (trimming, freezing) so the proposals for processing Cat 3 material into pet food are subject to the same rules on hygiene, segregation of activities and	Comment noted. In view of the comments received from this consultation, the FSA propose to develop some guidance to detail the conditions and production processes considered acceptable for approval of manufacturing of pet food from POAO or Category 3 ABPs within a food establishment.

Respondent	Comment	Response
Renewables Association	traceability as already exist – therefore no significant change is expected.	
FABRA – Foodchain & Biomass Renewables Association	There is also an option for making pet food out of food grade material – this is more confusing. The proposal allows for making the final decision on whether it is food or pet food until the material is packed and assumes the material will be under ‘food’ controls for the whole time.	Comment noted. As advised above, the FSA will now proceed only with the option of manufacturing of pet food in approved/registered food establishments from ingredients that contain POAO in a manner as food fit for human consumption. It is a legal requirement that until the destination of the product has been decided, the product must be considered food and treated as such. This will be detailed in the proposed guidance.
FABRA – Foodchain & Biomass Renewables Association	Currently the rules for processing food grade material into pet food insist that the material is downgraded to ABP status before it leaves the plant of origin – therefore it is consigned to the processing plant as an ABP and not a food product.	Comment noted. However, for this proposal, raw materials are not leaving the establishment. Therefore, until the destination of the product has been decided, the product must be considered food and treated as such.
FABRA – Foodchain & Biomass Renewables Association	The new proposal would be difficult to monitor and may result in material destined for pet food having the potential for going back into the food chain. Appropriate traceability would be key to making this work.	Comment noted. It is the intention that FSA will now proceed only with the scenario of manufacturing of pet food in approved/registered food establishments from ingredients that contain POAO in a manner as food fit for human consumption. In view of this, the risk to public health is considered very low. Adequate traceability system must be established by the FBOs and verification will be carried out by

Respondent	Comment	Response
		the competent authority which will be clarified in the proposed guidance.
Business producing pet food	We produce raw pet food using only listed ingredients which are labelled, handled and passed fit for human consumption. The facility is said by inspectors to be built and operated to the highest standard seen in the UK to-date.	Comment noted.
Business producing pet food	Inspectors have seen that we are extremely committed to producing the highest quality raw pet food. We are in the following remarks attempting to interpret and comment on proposals related to raw pet food.	Comment noted.
Business producing pet food	The proposed FSA / APHA as we understand it would result in a joint-registration scenario with human food facility registration held on record at FSA / APHA with the proposed sharing of responsibility for oversight.	Comment noted. APHA is responsible for the approval of pet food sites and enforcement is either delegated to the FSA or LAs depending on the location of the establishment. In view of the comments received from this consultation, the FSA propose to develop some guidance to detail the conditions and production processes considered acceptable for approval of manufacturing of pet food from POAO or Category 3 ABPs within a food establishment. We will ensure the proposed guidance includes a section on enforcement responsibilities which will also clarify approval and registration requirements.
Business producing pet food	It is acknowledged that the building and facility (“the facility”) would be a separate entity for the production of pet food under this proposed licensing arrangement. It would understandably be FSA with APHA approval	Comment noted. We will clarify in the proposed guidance how the responsibilities will be shared.

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	thereby creating a clear instruction as to the safety of the particular products in the market-place.	
Business producing pet food	For the purposes of the FSA responsibility we are in agreement that the ingredients used in the facility should only be registered ingredients suitable for human use and that all procedures, documentation, HACCP should be applicable to the standards required for human food production at a very minimum.	Comment noted.
Business producing pet food	We believe that the proposed registration moves in the right direction and provides a great improvement in clarity to businesses purchasing raw food for resale and end users. Assisted by trading standards it's a much needed opportunity to improve the safety and efficacy of raw food products in the UK.	Comment noted.
Business producing pet food	The growth in raw food generally is somewhat independent of composite "complete" raw food products. The "DIY" market, which poses greater risks, is growing in a sense disproportionately in part due to the wide availability of mince, offal and other products of various quality in supermarkets and other such places.	Comment noted.
Business producing pet food	Introducing a clear category registration will offer the highest degree of protection to consumers. In some polls particularly on those used to advise on pet food for new owners; up to 50% of consumers are looking to raw	Comment noted

Respondent	Comment	Response
	<p>pet food (complete or diy.) as the starting point for feeding their pets. This is an unprecedented change in the market.</p>	
<p>Business producing pet food</p>	<p>We believe that it would be important for the raw food category under these proposals to protect the consumer in some fundamental ways:</p> <p>(1) Cross-contamination removed by way of joint-registration; the prominent FSA Approval, joint APHA/FSA related inspections, use of only registered ingredients, human grade. Agreed updated guidance issue via Trading standards. No strictly category 3 ingredients should be used e.g. Green Tripe. Sealed packaging as used for mincemeat etc in supermarket.</p> <p>(2) Consumer safety (risk of consumption of bone particulates) protected by way of legally required labelling inc. updated approval by trading standards under the FSA/PHA registration. Clearly, 'marketed' as pet food in addition to primary registration. We do not think ground bone poses a significant risk under these conditions.</p> <p>Many animal by-products are attached to cartilage/bone and for the proposals to have a practical application for the use of said by-products referred to in the</p>	<p>Comments noted. To reduce the risk to public health, the FSA will now proceed only with the scenario of manufacturing of pet food in approved/registered food establishments from ingredients that contain POAO in a manner as food fit for human consumption. In view of this the risk to public health is considered very low. The proposed guidance will provide clarification on the necessary requirements of all aspects for this process in a proportionate and risk-based manner.</p>

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	consultation it is our opinion that correct labelling enforcement will be key. It is a concern otherwise that the proposals would apply only to trim meats and MDM.	
Business producing pet food	<p>The issues faced if human grade plant is used are many. barrier control and traceability needs will be significant. A few issues are listed below:</p> <p>A. We have had an increasing number of food safety issues with pet products causing human health issues e.g. specific type of salmonella on dried pigs ear causing illness in children in Ireland after handling of the treat. Use of same facilities may pose issues of different types of salmonella not normally issues in human production being able to move to new human products as they are processed in same plant</p>	<p>Comment noted. There is a growing interest on raw pet food, and we are fully aware of the potential impact. APHA FSA, and PMFA have worked together to develop guidance on good practices associated to raw pet food and links to this will be provided in the guidance.</p> <p>Raw pet foods: handling and preventing infection</p> <p>The PFMA's guidelines for the manufacture of raw pet food in the UK</p>
Business producing pet food	B. Microbial requirements for safe pet production are stricter than for human health eg entry requirements on finished products requiring better temperature control a move to joint plants will potentially reduce control.	Comment noted.
Business producing pet food	C. Cross contamination issues from lower micro standard human grade dried or cooked products to finished dried or cooked pet products would not be maintained unless regularity alignment which would reduce BSE controls which would not be acceptable	Comment noted. TSE controls are applicable to all products regardless of its intended use.

Respondent	Comment	Response
Business producing pet food	D. Utilisation of category 3 products on human consumption plants with higher microbial levels may pose increased cross contamination issues	Comment noted. ABPs are already handled in food approved establishments. There should not be any additional risk if adequate measures are in place.
Business producing pet food	E. maintaining BSE controls re animal product type allowed in food plants with potential loss of control into human product ranges if batches are mixed as has happened in raw and cooked cannery products	Comment noted. FBOs should have adequate controls in place based on the HACCP principles to ensure the risks are controlled.
Business producing pet food	F. Wide range of contaminated Asian pet products entering UK market causing potential issues of cross contamination or possible entry into human food chain if not tracked via these plants	Comment noted. This proposal is not intended for imported pet food.
Business producing pet food	I would have concerns for human health if this occurs and breakdown of possible BSE controls on mixed plant. From memory it was tried in Hull in Human grade facility reporting to be capable of doing both and failed due to lack of control. I'm sure the DEFRA team will have their previous reports on this.	Comment noted. BSE controls in place are regardless. It should not affect this proposal.

Respondent	Comment	Response
Pet Food Manufacturers Association (PFMA) and its members	<p>The Pet Food Manufacturers' Association (PFMA) represents approximately 90% of the UK pet food manufacturing industry. PFMA aims to raise the standards of pet food manufacturing whilst stimulating growth and reputation in the pet food industry. PFMA supports initiatives in these areas providing pet food products remain safe, of sound nutrition and offer value for money.</p> <p>PFMA and its members welcome the opportunity to provide their views on the proposals to allow the commercial production of pet food from animal by-products (ABPs) in businesses also producing food for human consumption. Below we share comments outlining some areas for consideration.</p>	Comments noted.
Pet Food Manufacturers Association (PFMA) and its members	<p>Handling ABPs in food establishments: In general the proposals reflect the provisions laid down by the ABP regulations. The ABP regulations already allow for category 3 materials to be handled at some food establishments and undergo some processing so rules on hygiene, segregation and traceability do currently exist and could be extended.</p>	Comment noted.
Pet Food Manufacturers Association	<p>Allowing pet food production in food producing establishments will require necessary controls to be in place to ensure feed and food hygiene. Incoming</p>	<p>Comments noted. Following responses from the consultation and further internal and external discussions, the FSA has taken the decision to proceed only with one scenario -</p>

Respondent	Comment	Response
(PFMA) and its members	<p>materials for pet food production should fulfil all essential hygiene requirements and be handled appropriately to avoid any future food scandals. Additionally, once categorised as ABPs, ABPs should not be allowed back into the food chain along with food intended for human consumption. Labelling both raw materials and finished products accordingly throughout their journey would be practical.</p> <p>Point of intention: Changing the point at which a product becomes destined for the pet food market to after its processing may be difficult to monitor. Establishments should ensure pet food products are not mistaken for human food, re-entering the food chain and blurring the line of intention.</p>	<p>Manufacturing of pet food in approved/registered food establishments from ingredients that contain POAO in a manner as food fit for human consumption. In view of this the risk to public health is considered very low. The proposed guidance will provide clarification on the necessary requirements of all aspects for this process in a proportionate and risk-based manner.</p>
Pet Food Manufacturers Association (PFMA) and its members	<p>Pet food additives It is unclear how the use of additives will work in practice. Additives used in the production of pet food must be approved for use as feed additives. Suppliers of feed additives are often highly experienced pet nutritionists. Where the human food supply route is used, establishments will need to ensure additives are authorised for pets, nutritionally safe and suitable for pet food products. We feel further consideration is needed in this area.</p>	<p>Comment noted. Any additional ingredient intended for the pet food processing must be food grade and adequate procedures must be in place to ensure that these are not used in food processing. We will ensure that this is clarified in the proposed guidance.</p>
Pet Food Manufacturers	<p>Public demand and perceptions: Currently products solely made from food materials are not able to then be</p>	<p>Comment noted.</p>

Respondent	Comment	Response
Association (PFMA) and its members	sold as pet food so the proposals could provide a solution where there is a demand for such products. Producing pet food in a food establishment will likely lead to a positive public perception on pet food quality although public messages will need carefully development so as not to adversely affect the perception of existing food products produced alongside pet food products.	
Pet Food Manufacturers Association (PFMA) and its members	Environmental considerations: Also for consideration, pet food has long been regarded as a sustainable way of utilising by-products of the human food industry and materials that are surplus to requirements. Creating a market for pet food products made of those materials also in demand by the human food industry dilutes this important environmental message.	Comment noted.

Summary of substantive comments via Survey Monkey

Are you responding as a Private Individual/ Organisation	Which food sector are you in?	What type of pet food are you looking to produce?	What are the costs and benefits of the proposal?	Will the proposal bring extra business?	Any other comments on the proposal	FSA Comments
Private Individual	Consultancy-specification technologist	None	None	None	It shouldn't be allowed	Comment noted.
Private Individual	Contract catering within healthcare, education and defence	N/A	No benefits, and the cost would be Poor judgment if this proposal is to go through. How long will it be before a food operator manufacturing pet foods see a business opportunity in re-directing foods for pet consumption into the human food chain???	It may bring extra business, but it will in fact bring poor practices, unnecessary contamination risk and businesses tempted in operating sharp practices.	Bin the proposal, the manufacturing of pet foods is not broken so why bring the manufacturing of pet and human foods under one roof. Remove the hazard and have the pet and human food production well separated in different buildings.	Comments noted. To reduce the risk to public health, the FSA will now proceed only with the scenario of manufacturing of pet food in approved/registered food establishments from ingredients that contain POAO in a manner as food fit for human consumption. In view of this the risk to public health is considered very low.
On behalf of an organisation	Food Safety Consultant	I'm not. I am most definitely against this			See point 3	Comments noted

Are you responding as a Private Individual/ Organisation	Which food sector are you in?	What type of pet food are you looking to produce?	What are the costs and benefits of the proposal?	Will the proposal bring extra business?	Any other comments on the proposal	FSA Comments
		proposal. There is enough distrust of the food industry without giving the press and the public further cause for concern.				
Private Individual	Environmental Health	N/A	N/A	N/A	This will be used as a cover for food fraud. This cannot be allowed to go ahead surely?	Comment noted. Following responses from the consultation and further internal and external discussions, to reduce the risk of food fraud and cross contamination, the FSA has taken the decision to proceed only with one scenario - Manufacturing of pet food in approved/registered food establishments from

Are you responding as a Private Individual/ Organisation	Which food sector are you in?	What type of pet food are you looking to produce?	What are the costs and benefits of the proposal?	Will the proposal bring extra business?	Any other comments on the proposal	FSA Comments
						ingredients that contain POAO in a manner as food fit for human consumption. In view of this the risk to public health is considered very low.
On behalf of an organisation/ company	Nil Infection Control Nurse	None	Unknown	N/A	I am worried that antibiotic contaminated animal products would be potentially introduced into the human food chain environment.	Comment noted. To reduce the risk to the public health, the FSA will now proceed only with the scenario of manufacturing of pet food in approved/registered food establishments from ingredients that contain POAO in a manner as food fit for human consumption. In view of this, there is minimum risk of antibiotic contaminated animal products being potentially

Are you responding as a Private Individual/ Organisation	Which food sector are you in?	What type of pet food are you looking to produce?	What are the costs and benefits of the proposal?	Will the proposal bring extra business?	Any other comments on the proposal	FSA Comments
						introduced into the human food chain environment.
Private Individual	Food manufacturing / microbiological & chemical analysis	None	Waste reduction	I'm sure of that	I have visited many food factories most good some very bad. This proposal will make it easier for rogue traders to put pet food into the human food supply chain	Comments noted. Following responses from the consultation and further internal and external discussions, to reduce the risk of food fraud and cross contamination, the FSA has taken the decision to proceed only with one scenario – Manufacturing of pet food in approved/registered food establishments from ingredients that contain POAO in a manner as food fit for human consumption. In view of this, the risk to public health is considered very low.

Are you responding as a Private Individual/ Organisation	Which food sector are you in?	What type of pet food are you looking to produce?	What are the costs and benefits of the proposal?	Will the proposal bring extra business?	Any other comments on the proposal	FSA Comments
On behalf of an organisation/ company	Enforcement	N/A	I suspect many food businesses (butchers) may already be doing this so to legalise it makes sense	-	-	Comment noted.
On behalf of an organisation/ company	Local government enforcement	N/A	N/A	I have some butchers already doing this, and it is an important additional income stream for them.	-	Comment noted
On behalf of an organisation/ company	N/A	N/A	Less waste of materials and reduce transportation costs	It seems likely	In addition to the advantages above, it may increase the amount of human-grade food available	Comments noted.

Are you responding as a Private Individual/ Organisation	Which food sector are you in?	What type of pet food are you looking to produce?	What are the costs and benefits of the proposal?	Will the proposal bring extra business?	Any other comments on the proposal	FSA Comments
					<p>to companion animal owners. This is not only important for the welfare of the animals, but important because of the close relationships between companion animals and humans which can lead to accidental ingestion of animal food by humans, such as where dogs are used as therapy for dementia sufferers.</p> <p>It could help to ensure that the likelihood of serious contamination of animal feed such as that which happened</p>	

Are you responding as a Private Individual/ Organisation	Which food sector are you in?	What type of pet food are you looking to produce?	What are the costs and benefits of the proposal?	Will the proposal bring extra business?	Any other comments on the proposal	FSA Comments
					across north America and, in part Australia, in 2007 is reduced. It may also provide more opportunities for existing feed manufacturers to produce food more locally.	
Private Individual	Hermetically sealed Long life ambient stored products	Hermetically sealed long life ambient stored products principally for veterinary use	Small runs are more easily handled and cost effective for smaller manufacturers.	Potentially	Manufacturing products with ingredients fit for human consumption at a different time to other production would not achieve any cost benefits but would increase production costs. Storage of hermetically sealed products separately from other products is	Comments noted.

Are you responding as a Private Individual/ Organisation	Which food sector are you in?	What type of pet food are you looking to produce?	What are the costs and benefits of the proposal?	Will the proposal bring extra business?	Any other comments on the proposal	FSA Comments
					not necessary and would not be achieved in the distribution chain so would seem contradictory at the point of manufacture.	
On behalf of an organisation/ company	Working dog food	Raw working dog food	The costs are financial outlay in terms of separation. The benefits are increased revenue, staffing levels and export potential.	Yes	-	Comments noted.
On behalf of an organisation/ company	Freeze Dried Manufacturer	Freeze Dried Pet Treats from Human Grade products such as chicken	The business is currently worth approximately £2,000,000 to the company	This is an area of rapid growth. The products are the same as sold as	I think that there needs to be a distinction between human grade into pet food, and off cuts from human grade	Comments noted. To reduce the risk to public health, the FSA will now proceed only with the scenario of manufacturing of pet food in approved/

Are you responding as a Private Individual/ Organisation	Which food sector are you in?	What type of pet food are you looking to produce?	What are the costs and benefits of the proposal?	Will the proposal bring extra business?	Any other comments on the proposal	FSA Comments
		breast, tuna, salmon fillet etc		freeze dried ingredients, these are not off cuts or offal. Premium products for pets is a key strategic area of growth for my company.	products into pet food.	registered food establishments from ingredients that contain POAO in a manner as food fit for human consumption. Therefore, the risk to public health is considered very low.
On behalf of an organisation/ company	Manufacture of complementary feeds and food supplements	Complementary feeds containing highly processed ABPs	Not known	Yes	Provided HACCP in place, the easing of the strict separation requirement is required.	Comments noted.
Private Individual	Animal Feed/ Complementary Feed/Food Supplements	Supplements/ Complementary Feeds	Cost savings from being able to handle pet food as human food	-	It would be nice to see a lifting on the requirement to use ABP authorised hauliers for transporting food	Comments noted. To reduce the risk to public health, the FSA will now proceed only with the scenario of manufacturing of pet food in

Are you responding as a Private Individual/ Organisation	Which food sector are you in?	What type of pet food are you looking to produce?	What are the costs and benefits of the proposal?	Will the proposal bring extra business?	Any other comments on the proposal	FSA Comments
					grade packaged processed animal by products for pet use i.e. Green lipped mussel leaving food distributor warehouse going to pet food plant.	approved/registered food establishments from ingredients that contain POAO in a manner as food fit for human consumption. In view of this, the risk to public health is considered very low.
On behalf of an organisation/ company	Freeze drying of food for human consumption. Some of the same product is also packed into retail packs as pet treats	Human Grade products into pet treats	The business is worth over £2,000,000 to the company and ensure the employment of at least 4 incremental personnel	Yes, this is a growing area which is seeing rapid growth	You discuss production carried out at a different time or date to human consumption. Why is segregation of production not considered as a viable requirement with access to the area through designated changing rooms and with dedicated cleaning, personnel and	Comments noted. The reasoning for the production of Pet Food to be carried out another time/date from food for human consumption is to ensure that there is complete separation of the two to avoid cross contamination. However, we propose to develop a guidance document and this will include that batch separation is acceptable, provided the risk of cross-

Are you responding as a Private Individual/ Organisation	Which food sector are you in?	What type of pet food are you looking to produce?	What are the costs and benefits of the proposal?	Will the proposal bring extra business?	Any other comments on the proposal	FSA Comments
					productflow? Can this be reviewed?	contamination between the food for human consumption and the pet food is managed.
On behalf of an organisation/company	Sheepmeat production - we are a UK wide membership association for sheep farmers and those involved in the sheep industry	N/A	There will be costs relating to company infrastructure in abattoirs and meat cutting plants to comply with separation etc but there could also be benefits and opportunities to add value and create more retained profit from utilising ABP and getting closer to the end market.	N/A	The success of the sheep meat sector is heavily dependent on its image and reputation. We agree with the opportunities that could come about from abattoirs and meat plants making better use of ABP and creating new market demand for pet foods. We also agree with the FSAs proposals for proper and demonstrable separation by time or place. While we	Comments noted.

Are you responding as a Private Individual/ Organisation	Which food sector are you in?	What type of pet food are you looking to produce?	What are the costs and benefits of the proposal?	Will the proposal bring extra business?	Any other comments on the proposal	FSA Comments
					support this proposal we would also like to stress the absolute importance of maintaining a high reputation for sheep meat for human consumption in terms of quality and safety. It is essential that consumer and market assurances can be given and underpinned by demonstrable good practice.	
On behalf of an organisation/ company	Raw pet food sector	My company produce raw pet food and are interested in making sure the same rules	Obviously the benefit of the proposal is a reduction in waste human food - I am sure you are suggesting this would	I am sure this proposal will bring in additional business. But at what cost?	Work alongside DEFRA. Ensure a level playing field for all manufacturers of pet food.	Comments noted. APHA is responsible for the approval of pet food sites and enforcement is either delegated to the FSA or LAs depending on the

Are you responding as a Private Individual/ Organisation	Which food sector are you in?	What type of pet food are you looking to produce?	What are the costs and benefits of the proposal?	Will the proposal bring extra business?	Any other comments on the proposal	FSA Comments
		<p>apply to FSA regulated manufacturers who decide to produce pet food as exist for me - regulated by DEFRA</p>	<p>be made into pet food. This has environmental benefits as well as a potential positive effect on cashflow. HOWEVER the issue does exist that companies that lack the knowledge to create good quality pet food are encouraged to do something that they have very little knowledge in, purely to increase revenue. This is a potential risk to pet health and human health. Also who will regulate the pet food manufacture? There is currently a huge</p>	<p>Also I would insist that in the spirit of fairness pet food manufacturers are also allowed to produce food for human consumption under certain conditions and meeting strict separation criteria</p>		<p>location of the establishment. We propose to develop a guidance document which will include a section on enforcement responsibilities and clarify approval and registration requirements.</p>

Are you responding as a Private Individual/ Organisation	Which food sector are you in?	What type of pet food are you looking to produce?	What are the costs and benefits of the proposal?	Will the proposal bring extra business?	Any other comments on the proposal	FSA Comments
			<p>risk in pet food where butchers - regulated by FSA - are producing and labeling a product called 'pet mince' and selling it as such. There is no requirement for that producer to meet FEDIAF nutritional guidelines, there is no typical analysis completed, there is no regulated testing for salmonella or enterio. This poses a massive risk to human and pet health.</p>			
On behalf of an organisation/ company	Pet Food	Small Animal and Bird Food	Less Transport and Storage Costs preventing 3rd party	-	-	Comment noted.

Are you responding as a Private Individual/ Organisation	Which food sector are you in?	What type of pet food are you looking to produce?	What are the costs and benefits of the proposal?	Will the proposal bring extra business?	Any other comments on the proposal	FSA Comments
			holding / manufacturing			
On behalf of an organisation/ company	Pet Food Manufacturer	We currently produce frozen pet food from ABP and are licensed by the APHA to do so.	Why is this survey one sided? I would like to express concern that this is a foregone conclusion.	Disregard for the regulations where our competitors are already sharing production lines between human and pet food are already significantly damaging my business.	As it is already happening in our particular sector why consult? Why not continue to turn a blind eye and allow those who are flouting the regulations to profit from those of us that do obey the rules?	Comments noted. The FSA propose to develop a guidance document to detail the conditions and production processes considered acceptable for approval of manufacturing of pet food from POAO or Category 3 ABPs within a food establishment. This will put in place a regulatory framework that will aid enforcement.
On behalf of an organisation/ company	Pet Sector	Fish based treats	Impact on current Pet sector manufacturers who have invested	It will impact heavily on financial	The proposal will impact on current small to medium Pet	Comments noted. APHA is responsible for the approval of pet food sites

Are you responding as a Private Individual/ Organisation	Which food sector are you in?	What type of pet food are you looking to produce?	What are the costs and benefits of the proposal?	Will the proposal bring extra business?	Any other comments on the proposal	FSA Comments
			heavily in meeting Defra guidelines	success of current pet food manufacturer s	food companies who have invested in manufacturing capabilities. It will reduce the control of Animal & Plant Health Agency (APHA)	and enforcement is either delegated to the FSA or LAs depending on the location of the establishment. We do not envisage this proposal to have an impact on the level of control undertaken by APHA.
On behalf of an organisation/ company	Pet Food production	Raw Complete	It will enable us to work out of our unit that is based next to a FSA appreciation fed area. Currently we cannot obtain DEFRA approval because of our location despite having separate access. So huge benefits for us!!	Absolutely. We currently can't trade without this approval	The sooner this goes through the better for us and other businesses in a similar position	Comments noted.

Are you responding as a Private Individual/ Organisation	Which food sector are you in?	What type of pet food are you looking to produce?	What are the costs and benefits of the proposal?	Will the proposal bring extra business?	Any other comments on the proposal	FSA Comments
Private Individual	Seafood	Canned fish for pet Pet chew	Infrastructure investment Sanitation/ food safety Control System Investment Customer trust	Maybe	What does it mean by more stringent	Comment noted. In view of the comments received from this consultation, the FSA propose to develop some guidance to detail the conditions and production processes considered acceptable for approval of manufacturing of pet food from POAO or Category 3 ABPs within a food establishment. The guidance will provide clarification on the necessary requirements of all aspects for this process in a proportionate and risk-based manner.
On behalf of an organisation/ company	Pet food Manufacture	Treats, Dry & Wet food for pets	Benefit is that we would be able to source supply of British chicken from British farms	Yes enabling us to supply into retailers and on-line at a reasonable	Protecting British business in a post Brexit era. Looking to source equivalent human grade food	Comments noted.

Are you responding as a Private Individual/ Organisation	Which food sector are you in?	What type of pet food are you looking to produce?	What are the costs and benefits of the proposal?	Will the proposal bring extra business?	Any other comments on the proposal	FSA Comments
			<p>processed at a British factory rather than outsourcing supply from Asia or Europe. More environmentally friendly, reduced food miles.</p> <p>Safeguards jobs in rural areas where the chicken is being processed.</p>	cost. Will enable us to compete with imported brands.	ingredients for use in premium pet food.	
On behalf of an organisation/ company	Cooked poultry manufacture for industry	Cooked shredded chicken for high end pet food. Same process and product as we use for human consumption so	Valuable contracts to be had in this growing sector of high end pet food.	Yes significant profitable UK business with high level job growth in a region of high unemployment.	We would aim to produce a product that is exactly the same in terms of raw material quality, traceability and food safety as per products for human consumption so there is no risk either way.	Comments noted.

Are you responding as a Private Individual/ Organisation	Which food sector are you in?	What type of pet food are you looking to produce?	What are the costs and benefits of the proposal?	Will the proposal bring extra business?	Any other comments on the proposal	FSA Comments
		no low grade materials.				
On behalf of an organisation/ company	Poultry	Premium food grade	No additional financial benefit, business security	Yes.	-	Comment noted.
On behalf of an organisation/ company	Fish processing	100% raw fish fillets to be supplied to a pet food manufacturer for high end pouched cat food	£10,000/week profitable UK taxable income and 20 jobs created	Yes its a significant opportunity for the same raw materials as per human consumption in a new market	We are proposing to supply products that fit into category 3 of the proposal. There is no difference in quality between the products supplied to pet food as to human consumption therefore no risk of Cross Contamination.	Comments noted.
On behalf of an organisation/ company	Red meat processing	N/A	N/A	N/A	I have serious concern that the production of pet food in a food premises	Comment noted. Following responses from the consultation and further internal and external

Are you responding as a Private Individual/ Organisation	Which food sector are you in?	What type of pet food are you looking to produce?	What are the costs and benefits of the proposal?	Will the proposal bring extra business?	Any other comments on the proposal	FSA Comments
					will affect consumer perception and seriously undermine consumer confidence in the food industry. This arrangement might facilitate fraudulent activity that would further undermine consumer confidence. There are many other opportunities to produce pet food other than in a food premises.	discussions, to reduce the risk of food fraud and cross contamination, the FSA has taken the decision to proceed only with one scenario - manufacturing of pet food in approved/registered food establishments from ingredients that contain POAO in a manner as food fit for human consumption. In view of this, the risk to public health is considered very low.
On behalf of an organisation/ company	Dairy	Dairy	The benefits of this proposal are that as a small business that produces a single product that is human grade and suitable for humans and animals – we would be able to	Yes definitely - it would be good for many small businesses	This proposal would allow us to reach a much wider market and help us massively. We cannot afford to have two separate units to produce identical	Comments noted.

Are you responding as a Private Individual/ Organisation	Which food sector are you in?	What type of pet food are you looking to produce?	What are the costs and benefits of the proposal?	Will the proposal bring extra business?	Any other comments on the proposal	FSA Comments
			change our labelling to market it towards pets rather than just humans. The product is the same product whether it is for humans or animals but currently we are unable to do this.		products. We can easily produce pet one day and human next if needed but if we could use the same facilities it would be amazing. Please consider it.	
On behalf of an organisation/company	Poultry production	Raw pet food from ABP generated on site Processed from ingredients fit for human consumption	Current financial weekly costs- £131,000/ establishment	Undoubtedly	Not at the moment	Comments noted.

Actions to be implemented

- Proceed with the proposal on the basis of one scenario - Manufacturing of pet food in approved/registered food establishments from ingredients that contain POAO in a manner as food fit for human consumption. This will minimise the risk to public health.
- Develop a guidance document to detail the conditions and production processes considered acceptable for approval of manufacturing of pet food from POAO or Category 3 ABPs within a food establishment to include:
 - A section on 'Introduction and Scope' to provide more clarity.
 - The common requirements that apply to the Manufacturing of pet food in approved/registered food establishments e.g. HACCP requirements.
 - A section on enforcement to clarify to enforcement responsibilities.
 - Clarity on the 'strict separation criteria' that the proposal sets out.
 - References for the requirements for food labelling and microbiological testing.
 - A review of acceptability of end of batch production rather than the production of pet food to be carried out at another date/time from food for human consumption.
 - A review of the definition of separation within the same freezer/chiller if the designated areas for pet food and food for human consumption are clearly segregated.
 - Clear and consistent terminology throughout.
 - References to the PFMA website which contains guidance and best practice.