



# **The co-location of food and pet food production:**

**Guidance and advice for Food Business  
Operators and their enforcement  
agencies**

**Published: December 2020**

## Revision history

Revision number	Date	Purpose of revision	Revised by
1	December 2020	Guidance implemented	Moira Williams

## Summary

### Purpose

This guidance is intended to help Food Business Operators and their enforcement agencies to better understand the controls and systems that must be put in place to manage the risks from the production of certain pet food in establishments that also produce food for human consumption.

### Legal status

This document provides best practice and regulatory guidance specifying what food business operators need to do to comply with domestic and EU legislation.

### Who is this publication for?

This guidance is for:

- food business operators
- enforcement agencies

### Which UK countries does this guidance apply to?

- England
- Wales
- Northern Ireland

### Review date

We will review this guidance before December 2021.

### Key words

- meat and livestock
- food law, monitoring and controls
- hygiene and food safety
- pet food
- animal by-products (ABP)
- products of animal origin (POAO)
- Hazard Analysis and Critical Control Points (HACCP)

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## Introduction

1. The Food Standards Agency (FSA) has received a number of enquiries from Food Business Operators (FBOs) and Local Authorities (LAs) regarding the scope for food businesses to manufacture pet food. In response to this, the FSA has collaborated with the Animal and Plant Health Agency (APHA) and the Department of Agriculture, Environment and Rural Affairs (DAERA), the bodies responsible for approval of pet food manufacturing, to develop the following guidelines. These guidelines advise FBOs and those responsible for official controls in these establishments on conditions and production processes considered acceptable for approval of manufacturing of pet food which include products of animal origin (POAO).
2. In March 2018, the FSA published a public consultation seeking stakeholder views on the conditions that need to be met on three potential scenarios if businesses choose to manufacture pet food in the same facility as food being produced for human consumption. In view of the responses received, a decision was made to proceed with the proposal on the basis of just 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.
3. Commercial manufacturing of pet food in businesses also producing food for human consumption shall be done under conditions of strict separation, in order to eliminate the risk of cross-contamination of the human food chain or the re-introduction of pet food into the food chain. Robust traceability systems are therefore required to assure the controls across the processing chains. This document outlines the necessary degree of separation and the traceability principles for the manufacturing of pet food from POAO within a food establishment in a manner as fit for human consumption
4. Any establishment already approved or registered for producing food for human consumption that also wishes to manufacture pet food must notify the relevant competent authority<sup>1</sup> before any dual operation commences<sup>2</sup>. Any such change will require revision and re-assessment of the Hazard Analysis and Critical Control Point (HACCP) based food safety management system. When agreement in principle has been obtained from the food business regulator, it will be necessary to apply for approval as a pet food plant – see paragraph 14.

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<sup>1</sup> See Enforcement section on page 11

<sup>2</sup> Article 6 (2) of 852/2004 - Food business operators shall also ensure that the competent authority always has up-to-date information on establishments, including by notifying any significant change in activities and any closure of an existing establishment

## Intended audience

5. 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
6. The enforcement authorities responsible for official controls in these establishments.

## Purpose of the guidance

7. These guidelines advise FBOs and those responsible for official controls in approved or registered establishments on conditions and production processes considered acceptable for approval of manufacturing of pet food from POAO within a food establishment in a manner as food fit for human consumption.
8. Whilst this approach may support businesses in diversifying and reducing food waste (subsequently lowering their carbon footprint), tight measures are needed to provide consumers' confidence in current controls, to protect both public and animal health and to prevent food fraud. These procedures are key in achieving this purpose.

## Legal status of guidance

9. These guidance notes have been produced to provide:
  - Guidance on the legal requirements of
    - [Regulation \(EC\) No.142/2011](#) implementing Regulation (EC) No.1069/2009 laying down health rules as regards animal by-products and derived products not intended for human consumption.
    - [Regulation \(EC\) No.183/2005](#) laying down requirements for feed hygiene.
    - [Regulations \(EC\) No. 767/2009](#) on the placing on the market and use of feed.
    - [Regulation \(EC\) No. 852/2004](#) on the hygiene of foodstuff.
    - [Regulation \(EC\) No. 853/2004](#) laying down specific hygiene rules for food of animal origin; and
  - Best practice guidance.

10. The guidance notes on legal requirements cannot cover every situation and you may need to consider the relevant legislation itself to see how it applies in your circumstances. Businesses with specific queries may wish to seek advice from their local enforcement authority, which will usually be the trading standards/ environmental health department of their local authority or APHA/Department of Agriculture, Environment and Rural Affairs (DAERA)<sup>3</sup>.
11. Following these guidance notes will help you to comply with the law. You are not required by law to follow best practice guidance. All guidance on best practice is identified in shaded boxes, with a heading of Best Practice:

### **Best practice**

All best practice guidance is clearly identified within this document by this style of format.

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<sup>3</sup> See Enforcement section on page 11

## IMPORTANT

### **EU references in FSA guidance documents are relevant during the transition period**

The UK exited the EU on 31 January 2020. There is now a transition period until the end of 2020 while the UK and EU negotiate additional arrangements. EU law continues to apply in the UK during the transition period, including rules on food and feed. This means references in this guidance to EU regulations (as amended) and any related EU guidance material remain relevant.

**From 1 January 2021**, other than in Northern Ireland, any references to EU Regulations should be read as meaning retained EU law. You can access retained EU law via HM Government EU Exit Web Archive. This should be read alongside any EU Exit legislation that was made to ensure retained EU law operates correctly in a UK context. EU Exit legislation is on [legislation.gov.uk](https://legislation.gov.uk). In Northern Ireland, EU law will continue to apply in respect to the majority of food and feed hygiene and safety law, as listed in the [Northern Ireland Protocol](#), and retained EU law will not apply to Northern Ireland in these circumstances.

When we publish new and amended guidance after the transition period, we will aim to ensure that cross-references are updated to accurately reflect the law which is then in force

## Application and scope

12. This guidance covers the manufacturing of pet food in approved/registered food establishments from ingredients that contain products of animal origin<sup>4</sup> and in a manner as food fit for human consumption.
13. Pet food manufacturing, for the purposes of this guidance includes all the processes of production from the selection of the raw materials to the storage of the packaged finished product.

### Note:

- i. This guidance is not intended to replace the instructions in chapter 2.8 of the Manual for Official Controls (MOC), APHA Operations Manual, any other guidance or regulatory requirement.
- ii. Pet food generated from non-animal ingredients only do not require approval under the ABP regulations. They will require registration under the Feed Hygiene Regulations (EC) No.183/2005 with the relevant enforcement authority.

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<sup>4</sup> Material fit for human consumption becomes an animal by-product when the intended use changes (“starting point” as defined in EC No 1069/2009, Title 1, Chapter 1, Section 2, Article 4)

## General requirements for the pet food manufacturing operation

14. FBOs should have considered, assessed and developed procedures in place for at least the following areas when considering the manufacturing of pet food in food establishments:
- A Hazard Analysis and Critical Control Point (HACCP) based management system for the pet food process, which considers the potential cross-contamination risks associated to the manufacture of food and includes a pest control plan.
  - Labelling and identification protocols for both food and pet food products to ensure continuous and unequivocal identification, traceability and segregation.
  - Hygiene procedures and Standard Operating Procedures detailing the separation between the manufacturing process.
  - A robust internal traceability system for both the pet food and food for human consumption, ensuring there is no re-introduction of pet food into the food chain, under the HACCP principles. Records and related documents associated with the manufacturing of pet food shall be maintained for a minimum period of two years.
  - Structural, equipment and staffing requirements as required for both food and pet food production.
  - Microbiological sampling programme as required by the ABP Regulations (Annex XIII of (EC) No. 142/2011) and good hygiene practice and guidance, including corrective actions when results deviate from the expected levels. Further guidance can be found on the APHA website for [Laboratory testing requirements for animal by-products \(ABPs\)](#)
  - Recall/withdrawal procedures in case there is a need to remove the product from the market.
  - Procedures to prevent unauthorised persons and animals gaining access to the pet food production area.

### Note:

- i. The labelling for pet food products cannot include the Identification Mark (Health Mark) used for food for human consumption manufactured at the establishment.
- ii. Separate commercial documents are required for food and petfood. The petfood document must be in the format of the simplified document specified at Annex VIII of Regulation 142/2011.

## Approval and registration

15. The FBO must gain approval from the APHA in England and Wales<sup>5</sup>, and DAERA in Northern Ireland<sup>6</sup> as an ABP pet food manufacturing site prior to the commencement of the operations. The process would need input from both LAs and FSA as the operations will be co-located to food processing operations.
16. In England and Wales, registration under the Feed Hygiene Regulations with the relevant LA is also required, although this should not result in any additional requirement for the FBO. For registration and/or approval you will need to make an application to the local authority trading standards office (TSO) responsible for the area in which your feed establishment operates - you can [find your TSO online](#)

## Enforcement

17. The risk-based inspection and enforcement of the co-located pet food manufacturing area and associated activities will be the responsibility of different enforcement bodies, depending on the location of the establishment.
18. Where responsibilities for operations overlap or where communal areas exist, APHA, FSA, DAERA and LAs will have to coordinate the way official controls are implemented. The enforcement agencies will give consideration to a joint supervisory visit and work together to determine which authority should take any necessary enforcement action.
19. The table below is intended to clarify where the different responsibilities fall in the different administrations for which contact details and related links can be found at Annex A:

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<sup>5</sup>[FSA pet food guidance](#)

<sup>6</sup>[DAERA guidance on pet food manufacture](#)

## Enforcement responsibilities table

	<b>Approval (under ABP legislation)</b>	<b>Registration (under feed hygiene legislation)</b>	<b>Enforcement *</b>
England and Wales	APHA	LA	LA/TS
Northern Ireland	DAERA (ABP Branch)	DAERA	DAERA (VPHP)

\* Local arrangements may apply.

## **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**

20. Manufacturing of pet food solely from ingredients fit for human consumption that contain POAO is permitted, using the same equipment and rooms used for food for human consumption. Under these circumstances, raw materials are to be handled at all times as fit for human consumption up until the point of packaging and storage, i.e. once the product is packaged as pet food it will need to be handled and stored separately and clearly labelled as pet food.
21. The food/pet food processing area should be constructed from materials, and contain equipment which are easily cleanable. This should include hand washing facilities and, where necessary, suitable temperature-controlled storage facilities.

## Best practice

22. Such a business should comply with the requirements laid out below:-

- The pet food processing area and equipment can be shared with the food processing areas, provided these are used at different times or dates. Batch separation is acceptable, provided the risk of cross-contamination between the food for human consumption and the pet food is managed.
- There is no need to have a separate changing facility, exclusive personnel or use different protective clothing.
- It is advisable to follow a specific working pattern to clearly separate the two processing operations e.g. pet food manufactured at the end of the day or on separate days to that of food for human consumption. If batch separation is used, a colour coded system can be implemented to ensure all personnel are able to identify the different manufacturing lines.
- Staff toilets and other amenities (e.g. canteens) may be shared with the food production establishment provided their location and procedures for use prevent cross contamination (i.e. protective clothing must not be worn in these areas).
- Any additional ingredient, additive or packaging intended for the pet food processing, can be stored in the same room with other food ingredients or packaging provided these are clearly identified, separated in a designated area and fully sealed. These must be food grade, and clearly listed and identifiable to prevent their accidental use during the food processing.
- Adequate procedures should be in place to ensure that any additional food grade packaging or ingredients intended for pet food processing are not used in food processing.
- Although the storage of the pet food manufactured on site must remain separated from food, the same chillers or freezers can be shared, 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.
- Loading/unloading bays, can be shared with food production areas, provided there is adequate time separation and all products handled are adequately wrapped, packaged and clearly labelled.
- The same transport vehicles can be used for pet food and food for human consumption, provided all the final products are clearly identified/labelled, completely sealed and leak proof.

- Transport vehicles intended for the pet food processing operations, can share the entrance/exits of the food establishment they are in, provided the risk of cross contamination to the production of food for human consumption is managed.

## References

23. A list of useful contacts and related links can be found at Annex A.
24. A list of frequently asked questions and answers (FAQ) can be found at Annex B.

## Review

We aim to keep all guidance up to date and undertake regularly reviews to ensure guidance remains relevant. The next scheduled review date for this guidance is December 2021.

## Contact us

We welcome your feedback on this guidance, including reports of any broken links or out-of-date content. Please provide any feedback to [meathygiene@food.gov.uk](mailto:meathygiene@food.gov.uk).

## Annex A: Useful contacts

### Food Standards Agency – For policy related issues

Meat Hygiene Policy Team	Food Standards Agency 6 <sup>th</sup> Floor Clive House 70 Petty France London SW1H 9EX	Telephone: 020 7276 8000 Email: <a href="mailto:meathygiene@food.gov.uk">meathygiene@food.gov.uk</a>
FSA in Northern Ireland	Food Standards Agency 10a-c Clarendon Road Belfast BT1 3BG	Telephone: 028 90417700 Email: <a href="mailto:executive.support@food.gov.uk">executive.support@food.gov.uk</a>

### Animal and Plant Health Agency Offices

Contact details	<a href="https://www.gov.uk/government/organisations/animal-and-plant-health-agency/about/access-and-opening">https://www.gov.uk/government/organisations/animal-and-plant-health-agency/about/access-and-opening</a>
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### Department of Agriculture, Environment and Rural Affairs (Northern Ireland)

DAERA Direct Regional offices	<a href="https://www.daera-ni.gov.uk/contacts/daera-direct-regional-offices">https://www.daera-ni.gov.uk/contacts/daera-direct-regional-offices</a>
DAERA Animal By-products Policy	<a href="mailto:ignatius.mckeown@daera-ni.gov.uk">ignatius.mckeown@daera-ni.gov.uk</a>

### Local Authority Contact Details

England and Wales	<a href="http://www.food.gov.uk/enforcement/yourarea/">http://www.food.gov.uk/enforcement/yourarea/</a>
Northern Ireland	<a href="https://www.nidirect.gov.uk/contacts/local-councils-in-northern-ireland">https://www.nidirect.gov.uk/contacts/local-councils-in-northern-ireland</a>

# The Pet Food Manufacturing Association (PFMA)

**PFMA – The leading trade body for the UK pet food industry**

<https://www.pfma.org.uk>

## Annex B : Frequently asked questions

**Q1. I understand that APHA/DAERA provide approval for pet food production, but as I am registered with my local authority as a food business would I also require approval from the Food Standards Agency?**

APHA/DAERA are the body responsible for approval of pet food processing if you are using animal by-products such as meat, fish or dairy products. Before commencing production, food business operators must gain approval from APHA/DAERA to be recorded as an ABP pet food processing site (for premises in England and Wales

The approvals process will require input from your LA and the FSA. Details of the requirements that need to be met can be found in the guidance document above.

**Q2. I intend to use animal by products (for example including meat, meat products or dairy products) in the pet food I am making. Are there any specific requirements relating to this?**

Yes. As in Q1 above, if you intend to use material of animal origin in your products (please note 'animal origin' also includes for example: milk, eggs and material of marine origin such as fish and shellfish), then you will also need to seek approval from APHA/DAERA under the animal by-products rules for which that department is responsible. This is because of the implications for animal health from the improper manufacture, transport, storage and use of material of animal origin. More information on these rules is available at <https://www.gov.uk/using-animal-by-products-to-make-pet-food>

**Q3. Which enforcement body will have responsibility for inspecting my business?**

APHA/DAERA will have responsibility to undertake risk-based inspections and enforcement at co-located pet food processing establishments (i.e. those establishments where both food and pet food production takes place). Where operations overlap or where communal areas exist, FSA, DAERA, LA and APHA staff will need to co-ordinate to ensure that both food and pet food production areas are not at risk of contamination. (please refer to enforcement section of the guidance).

**Q4. As an approved food establishment, I must include my establishments identification mark on all produce that I manufacture and place on the market. Can I use this identification mark on any product destined for pet food that I produce?**

No. The labelling of pet foods cannot include any reference to the identification mark (i.e. health mark) used for food for human consumption manufactured at your establishment.

### **Q5. I want to set up a small business at home making pet food or pet treats – what do I need to do?**

It may be possible to approve processed pet food production in domestic premises but you will be required to adhere to all the conditions applicable to other pet food plants, including the requirement to carry out bacteriological sampling and put in place a feed safety management system based on the principles of HACCP. **However, it is not permitted to make a commercial raw pet-food product from your domestic kitchen.** You should contact your local Trading Standards Office to register and/or seek further advice. Additionally, and importantly, if using animal by-products such as meat, fish or dairy products, approval as a petfood plant from APHA/DAERA will be required. Contact details can be found at Annex A (above).

### **Q6. Where can I find the labelling requirements for pet food?**

There is further information on pet food labelling on our website at <https://www.food.gov.uk/business-guidance/pet-food>

Industry sectors were invited to develop practical guidance for industry, consumers and authorities on how to apply the EU rules. Guidance can be found on the [Pet Food Manufacturer's Association \(PFMA\) website](#) which also includes [the FEDIAF Code of Good Labelling Practice for Pet Food](#) and gives guidance on pet food labelling.

If you need further advice please contact your local TSO, but please note it is the responsibility of the FBO to ensure any product sold by them is in compliance with the legislation.

### **Q7. I intend to label my product as organic / vegetarian. What requirements apply?**

If you intend to use the term 'organic' you will need to comply with the restrictions which apply to that designation. The list of organic control bodies can be found at <https://www.gov.uk/government/publications/organic-certification-list-of-uk-approved-organic-control-bodies>

There are no set legal requirements for the use of the term vegetarian, however you must ensure that any claim is not misleading, and you may wish to seek further advice from an association such as the Vegetarian Society (<https://www.vegsoc.org/foodlabelling>).

Manufacture of vegetarian pet food which contains egg and dairy products requires approval under the Animal By-Products Regulations.

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