

## Pet Foods/Treats/Chews of Animal Origin

**Special note regarding residues:** Effective March 1, 2012, Japan implemented new requirements for residues and labeling for certain products for pet consumption. The Japanese importer may be required to demonstrate compliance with these requirements before products are placed on the market. U.S. products could be tested by Japanese authorities for compliance. Some information is available on Japan's website at: [http://www.famic.go.jp/ffis/pet/obj/sub1e\\_seibun kikaku.pdf](http://www.famic.go.jp/ffis/pet/obj/sub1e_seibun kikaku.pdf). The competent USG authorities to address U.S. producers' questions and concerns regarding the residue requirements of another country [for pet food] are:

- The U.S. Food and Drug Administration  
<http://www.fda.gov/RegulatoryInformation/Guidances/ucm125789.htm> ;and
- The USDA Foreign Agricultural Service  
[http://www.fas.usda.gov/scripts/w/field/ovs\\_directory\\_search.asp](http://www.fas.usda.gov/scripts/w/field/ovs_directory_search.asp).

### I. “Extruded” or “Hermetically Sealed” Pet Foods/Treats/Chews

**APHIS does not issue certificates for these pet foods/treats/chews to Japan.**

Our understanding is that no animal health certification is required for fully processed cooked (finished, packaged, ready for retail sale, shelf-stable) pet food to be imported to Japan.

Fully processed cooked means materials must be:

- Cooked and dry (“crunchy”) (kibble type products produced through an extrusion process); or
- Semi-moist products produced through an extrusion process\*; or
- Hermetically sealed products (packaged using a retort process).

[If materials do not meet the above criteria please see information in below sections.]

Package labeling must indicate that product is for consumption by pets (this can be inferred as long as it is obvious to Japanese port authorities that product is not intended for feeding to livestock or use as fertilizer).

Prior to shipment, exporters should still have their importers confirm with Japanese authorities at the port of entry that consignments will be allowed entry. Exporters may wish to provide the importers with photographs of the actual products and scans of the labels for use in the discussions.

\*Some border inspection officials in MAFF may not be allowing the import of some semi-moist pet foods/treats even if they are produced through extrusion. Exporters should have their importers discuss in detail with the MAFF officials at the expected port of

entry into Japan the nature of the product to confirm if entry will be allowed. The port of entry may require semi-moist pet foods to be certified as noted in section V below.

## **II. Pet Treats and Chews Made from only (1) “External” Tissues of Pigs/Equines/Bovines/Caprines/Ovines such as Hide, Ears, Snouts, and Hooves or (2) Bones of Pigs/Equines**

Materials that fall into this category include only those materials that are not produced through extrusion or retort-processing (hermetically sealed) but are:

1. A. Porcine/Equine Materials derived from tissues other than internal soft tissue organs and muscle meat; OR  
B. Bovine/ovine/caprine materials derived from tissues other than internal soft tissue organs or muscle meat OR bones; and
2. Shipped packaged ready for retail for pet consumption; and

Examples of materials included in this category are: pig ears, bovine hooves, rawhide treats, pig snouts.

Examples of materials NOT included in this category are: meat jerky, dried chicken livers, and bovine bones.

These materials must be exported accompanied by a VS Form 16-4 with ONLY the following additional declarations:

This office has on file a notarized affidavit from [insert company name] verifying the accuracy of the statements below. I, the endorsing official listed below, have read the notarized affidavit referenced above, and to the best of my knowledge and belief these statements are true.

*The products described below are not likely to transmit infectious diseases of domestic animals.*

*The products described below contain only those animal origin ingredients (other than egg, dairy, or fish) derived from animals that passed ante-mortem government inspection at slaughter.*

*The products described below are packaged ready for retail sale for pet use.*

Chews derived from cervid animals are banned (unless they are produced through extrusion or retort-processing).

Prior to shipment, exporters should still have their importers confirm with Japanese authorities at the port of entry that consignments will be allowed entry with the available

documentation. Exporters may wish to provide the importers with photographs of the actual products and scans of the labels for use in the discussions.

### **III. Special Information on Freeze Dried Products\***

Japan requires ALL "freeze dried" animal-origin products (other than fish or dairy) to meet the same requirements as meat imported for human consumption. This means that these products must be certified by the Food Safety and Inspection Service (FSIS).

FSIS is currently evaluating whether or not their regulations permit endorsement of freeze dried products export for use as pet food. Exporters should contact the FSIS Technical Service Center for information on if their products are eligible for the required certification to export to Japan.

\*At this time we do not think that FSIS is providing the necessary certification for freeze-dried products to Japan. This would mean these products are not eligible for export to Japan at this time.

### **IV. Pet Food/Treats/Chews that Contain NO Animal-origin Ingredients**

Our understanding is that no animal health certification is required for fully processed cooked (finished, packaged, ready for retail sale, shelf-stable) pet food to be imported to Japan.

Fully processed cooked means materials must be:

- Cooked and dry ("crunchy") (kibble type products produced through an extrusion process); or
- Semi-moist products produced through an extrusion process; or
- Hermetically sealed products (packaged using a retort process).

Pet foods/chews/treats that do not meet the above criteria are still eligible to enter Japan with no certification if they contain no animal-origin ingredients.

However, if the MAFF inspectors at the port of entry into Japan are not comfortable based upon product labels and other documentation provided by the importer that the pet food (which is not extruded or hermetically sealed as defined above) is free of animal-origin ingredients) they may require the certification located at the following link:

[http://www.aphis.usda.gov/regulations/vs/iregs/products/downloads/ja\\_non\\_am.pdf](http://www.aphis.usda.gov/regulations/vs/iregs/products/downloads/ja_non_am.pdf)

This certification is not available for pet foods that are fully processed cooked as defined above.

Prior to shipment, exporters should have their importers discuss in detail with the MAFF officials at the expected port of entry into Japan the nature of the product to confirm if entry will be allowed with the available documentation.

**V. Pet Food and Pet Treats/Chews that are NOT Produced through Extrusion or Hermetically Sealed (through Retort Processing) that Contain NO Animal-Origin Ingredients [exception fish and/or dairy and/or powdered egg] other than POULTRY**

The following certification is required for pet foods containing no animal-origin ingredients [exception: fish and/or dairy and/or powdered egg] other than poultry if those pet foods/chews/treats are not either hermetically sealed (through retort processing) or produced through extrusion. These are materials such as baked treats that are not produced through extrusion. Prior to endorsement of this certification, APHIS inspection of the production facility and sometimes the facilities supplying those facilities is necessary.

[Note- the “exception: fish and/or dairy and/or powdered egg” clause means that in order to fall under these requirements the product must include poultry but may not include any other animal-origin ingredients other than fish and/or dairy and/or powdered egg. Product does not need to contain fish or dairy or powdered egg to fall under these requirements. This exception does not apply to liquid egg. The egg ingredient must be “powdered” prior to inclusion on the pet food.]

Regarding the “LPAI-banned areas” referenced in the second paragraph of the certification below, please go back to the previous page and select “**\*ALERT\*** [Important information regarding trade bans on various products.](#)” Please note that these products are subject to Japan’s NAI bans, requiring verification of no poultry-origin ingredients derived from poultry that were in or transited “banned” areas during the ineligible production dates.

Required certification:

*There have been no outbreaks of highly pathogenic notifiable avian influenza (HPNAI) in the United States for at least 90 days before shipment of the materials described below; or when the United States has an outbreak of HPNAI, there have been no outbreaks of HPNAI in the State where birds for the materials described below were produced for at least 90 days before shipment of the materials described below. Further, in the area where birds for the materials*

*described below were produced (such an area being within a minimum radius of 50 kilometers from the production farm), Newcastle disease, fowl cholera and other serious infectious fowl diseases other than LPAI, as recognized by the government of the United States, have not occurred for at least 90 days before shipment of the exported poultry meat.*

*The live poultry used for the production of the materials described below did not originate from nor pass through any LPAI-banned area before being carried into poultry processing plants. An LPAI-banned area is any zone within 10 km of any premises where an infection of NAI virus that is not HPNAI as defined in the OIE Terrestrial Animal Health code (OIE Code) has been confirmed and restricted from export by Japanese Animal Health Authorities.*

*The materials described below described below were:*

- 1. Derived from poultry recognized to be free of any animal infectious diseases and fit for human consumption as demonstrated by passing ante-mortem inspection at slaughter.*
- 2. Manufactured at processing facilities authorized by the government authorities in the United States as one for pet treat production and subjected to regular inspection by animal health authorities in the United States to ensure hygienic conditions and verify these animal health requirements.*
- 3. Subjected to one of the following minimum heat treatments: 70C for 30 minutes, 80C for 9 minutes, or 90C for 1 minute.*
- 4. Packaged ready for retail sale for pet use.*

## **VI. Pet Food and Pet Treats/Chews that are NOT Produced through Extrusion or Retort Processing/Hermetically Sealed that Contain NO Animal-origin Ingredients other than dairy and/or fish and/or powdered egg**

Pet foods and treats that do not fall into any of the above categories (e.g. that are not cooked/crunchy or hermetically sealed) but that contain no animal origin ingredients other than dairy and/or fish are believed to be eligible with a VS Form 16-4 with no additional declarations other than verification that the products contain no animal origin ingredients other than dairy and/or fish and/or powdered egg. [These products must contain at least dairy or fish ingredients.] Additional statements may not be added to the VS Form 16-4. Exporters should have their importers confirm with the Japanese port authorities (at the port the product will enter Japan through) prior to export that the consignment will be permitted entry with the available VS Form 16-4.

## **VII. Pet Food and Pet Treats/Chews that are NOT Produced through Extrusion or Retort Processing/Hermetically Sealed**

## **that Contain NO Animal-origin Ingredients other than Gelatin, Vitamin D3, Dicalcium Phosphate, and/or Animal Fat**

Pet foods and treats that do not fall into any of the above categories, and that contain no animal-origin ingredients other than gelatin, Vitamin D3, dicalcium phosphate, and/or animal fat, require the certification under the “[Feeds and supplements \(for animals other than horses\)](#) containing no animal origin ingredients other than gelatin, vitamin D3, dicalcium phosphate, milk products, and/or animal fat (other than bovine fat)” requirements available on the previous page. Please note that this does NOT include pet food produced through extrusion or retort processing/hermetically sealing.

### **VIII. Other Pet Food and Pet Treats/Chews Not Eligible for Export to Japan**

Pet foods and treats that do not meet any of the above criteria are believed NOT to be eligible for export to Japan. This includes animal-origin:

- Baked products that do not fall into one of the categories above.
- Hermetically sealed products that were not produced through retort processing [With the exception of those that fall under one of the other categories above.]
- Products that are not shelf stable.
- Freeze-dried products (other than ones that could receive the necessary certification from FSIS\* or that are first heat treated and fall under one of the categories above. \*At this time we do not think that FSIS is providing the necessary certification for freeze-dried products to Japan.
- Products that are not packaged ready for retail sale clearly labeled for consumption by pets.