

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_seibunkikaku.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
https://apps.fas.usda.gov/overseas_post_directory/ .

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

The products may also contain egg, fish, and dairy origin coatings/ingredients in addition to those eligible tissues listed in 1.A. and 1.B. above (but they must also include at least one of the materials listed in 1.A. and 1.B. to come under these requirements).

Examples of materials included in this category are: pig ears, bovine hooves, rawhide treats, pig snouts (with or without dairy, fish, and/or egg derived coatings).

Examples of materials NOT included in this category are: retort processed products, extruded products, meat jerky, dried chicken livers, bovine bones, and products not containing tissues eligible in 1.A. and 1.B. above.

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.

Certification Requirements

If exported treats/chews do NOT also contain dairy:

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 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.

If exported treats/chews DO also contain dairy:

These materials must be exported accompanied by a VS Form 16-4 with ONLY the following additional declarations on page 1, and the “**Veterinary Certificate for raw milk and milk products from cloven-hoofed animals to be exported to Japan from the United States for animal consumption (not including extruded or retort processed pet foods) also containing animal-origin materials other than those derived from milk/milk products**” as pages 2-3 of the certificate:

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.

III. Special Information on Freeze Dried Products*

Japan requires ALL "freeze dried" animal-origin products (other than fish or dairy) that do not meet the requirements explained in another section of this document 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

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. **The exporting facility must be listed in the APHIS system as approved for these exports. Exporters should contact their local VS Service Center to request the relevant pre-inspection package with details on how to obtain this approval.**

[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:

Begin “Additional Declarations” text>>>>

For Pet Food and/or Pet Treats/Chews Derived from Poultry that were NOT Produced through Extrusion or Hermetically Sealed (through Retort Processing):

The Pet Food/Treats derived from poultry described below:

A. Were manufactured at the following facility: (insert facility name and address):

B. 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 in the State where an infection of NAI virus that is not HPAI as defined in the OIE Terrestrial Animal Health code (OIE Code) has been confirmed and restricted from export by Japanese Animal Health Authorities.

There have been no outbreaks of highly pathogenic avian influenza (HPAI) 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 HPAI:

(1) When the state-level HPAI zoning is applied, there have been no outbreaks of HPAI in the state where birds for materials described below were produced or that through which the birds were transported for at least 90 days before shipment of the materials described below; or when the state where the materials described below is produced has an outbreak of HPAI, there have been no outbreaks of HPAI in the State for at least 90 days before the estimated earliest date of exposure for the detection of HPAI in the State.

(2) When the county-level zoning is applied, there have been no outbreaks of HPAI in the county where birds for materials described below were produced or that through which the birds were transported for at least 90 days before shipment of the materials described below; or when the County where the materials described below is produced has an outbreak of HPAI, there have been no outbreaks of HPAI in the County for at least 90 days before the estimated earliest date of exposure for the detection of HPAI in the County.

In the county where birds for the materials described below were produced, Newcastle disease (as defined in the OIE Terrestrial Animal Health Code), fowl cholera and other serious infectious fowl diseases (other than NAI) as recognized by the government of the United States have not occurred for at least 90 days before shipment of the materials described below.

C. The materials 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.*

<<<End “Additional Declarations” text.

The “Product” box of the VS Form 16-4 must include the following text:
“Manufacturing date(s):” followed by the manufacturing date(s). Also included must be the type of product, quantity, unit of measure, and species of origin.

In the IDENTIFICATION BOX OF THE VS Form 16-4, the following information must be included:

Container #: [insert container #]; Port of destination: [Insert port of destination];
Seal #: [Insert seal #]; Expected shipping date: [insert date product expected to leave port]

Note: If the product does also contain dairy-origin ingredients, in addition to the above declarations on the VS Form 16-4, the “**Veterinary Certificate for raw milk and milk products from cloven-hoofed animals to be exported to Japan from the United States for animal consumption (not including extruded or retort processed pet foods) also containing animal-origin materials other than those derived from milk/milk products**” must be added as additional pages to the VS Form 16-4, and after the “species” is identified on the first page of the VS Form 16-4, “dairy” should be inserted, e.g.: Bovine (dairy).

VI. 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 PORK [excludes 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]

The following certification is required for pet foods containing no animal-origin ingredients [exception: fish and/or dairy and/or powdered egg] other than porcine materials 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. **The exporting facility must be listed in the APHIS system as approved for these exports. Exporters should contact their local VS Service Center to request the relevant pre-inspection package with details on how to obtain this approval.**

[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 porcine materials 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.]

Required certification:

For Pet Food and/or Pet Treats/Chews Derived from Pork that were NOT Produced through Extrusion or Hermetically Sealed (through Retort Processing):

- 1. The United States is free from classical swine fever (CSF), foot-and-mouth disease (FMD), Rinderpest, and African Swine fever.*
- 2. In the United States, vaccination against CSF, FMD, Rinderpest, and African Swine fever is prohibited.*
- 3. In the United States, the importation of pigs vaccinated against CSF, FMD, Rinderpest, or African Swine fever is prohibited.*
- 4. The pet food/treat(s) referenced below were:*
 - Derived from the carcasses of swine that passed ante-mortem government inspection at slaughter.*
 - Manufactured in the following manufacturing facility approved by the USDA through regular on-site inspections for pet food/treat production and as meeting the "Animal Health Requirements for Pet Food/Treats Derived from Pork Exported to Japan from the United States"*: *[insert name, address, and approval number of manufacturing facility]*.*
 - Subjected to one of the following minimum heat treatments during production: 70 degrees Celsius for 30 minutes, 80 degrees Celsius for 9 minutes, or 90 degrees Celsius for 1 minute.*
 - Packaged prior to export ready for retail sale for pet use.*
 - Stored in a safe and sanitary condition from an animal health point of view until shipment to Japan*
[insert ONE of the following]:
 - option one:*
 - Were exported directly from the manufacturing facility referenced above to Japan without storage in other facilities prior to shipment.*
 - or*
 - option two:*
 - Were stored at the following facility (or facilities) between manufacture and shipment to Japan: *[insert name and address of any storage facilities where**

product was stored between leaving manufacturing facility and being exported to Japan].

**Dried pet foods produced through extrusion or hermetically sealed pet foods are not covered by the "Animal Health Requirements for Pet Food/Treats Derived from Pork Exported to Japan from the United States."*

Note: If the product does also contain dairy-origin ingredients, in addition to the above declarations on the VS Form 16-4, the **“Veterinary Certificate for raw milk and milk products from cloven-hoofed animals to be exported to Japan from the United States for animal consumption (not including extruded or retort processed pet foods) also containing animal-origin materials other than those derived from milk/milk products”** must be added as additional pages to the VS Form 16-4, and after the “species” is identified on the first page of the VS Form 16-4, “dairy” should be inserted, e.g.: Bovine (dairy).

VII. 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 and PORK [excludes 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]

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 and porcine materials 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. **The exporting facility must be listed in the APHIS system as approved for these exports. Exporters should contact their local VS Service Center to request the relevant pre-inspection package with details on how to obtain this approval.**

[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 porcine materials 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.]

Required certification:

Begin “Additional Declarations” text>>>

For Pet Food and/or Pet Treats/Chews Derived from Poultry and Pork that were NOT Produced through Extrusion or Hermetically Sealed (through Retort Processing):

The Pet Food/Treats derived from poultry and pork described below:

A. Were manufactured at the following facility: (insert facility name and address):

B. Regarding poultry meat etc. ingredients;

There have been no outbreaks of highly pathogenic avian influenza (HPAI) 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 HPAI:

(1) When the state-level HPAI zoning is applied, there have been no outbreaks of HPAI in the state where birds for materials described below were produced or that through which the birds were transported for at least 90 days before shipment of the materials described below; or when the state where the materials described below is produced has an outbreak of HPAI, there have been no outbreaks of HPAI in the State for at least 90 days before the estimated earliest date of exposure for the detection of HPAI in the State.

(2) When the county-level zoning is applied, there have been no outbreaks of HPAI in the county where birds for materials described below were produced or that through which the birds were transported for at least 90 days before shipment of the materials described below; or when the County where the materials described below is produced has an outbreak of HPAI, there have been no outbreaks of HPAI in the County for at least 90 days before the estimated earliest date of exposure for the detection of HPAI in the County.

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 in the State where an infection of NAI virus that is not HPAI as defined in the OIE Terrestrial Animal Health code (OIE Code) has been confirmed and restricted from export by Japanese Animal Health Authorities.

In the county where birds for the materials described below were produced, Newcastle disease (as defined in the OIE Terrestrial Animal Health Code), fowl cholera and other serious infectious fowl diseases (other than NAI) as recognized by the government of the United States have not occurred for at least 90 days before shipment of the materials described below.

The poultry meat etc. ingredients or the pet food containing the poultry meat etc. ingredients 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.*

C. Regarding pork ingredients;

The United States is free from classical swine fever (CSF), foot-and-mouth disease (FMD), Rinderpest, and African Swine fever.

In the United States, vaccination against CSF, FMD, Rinderpest, and African Swine fever is prohibited.

In the United States, the importation of pigs vaccinated against CSF, FMD, Rinderpest, or African Swine fever is prohibited.

The pork meat etc. ingredients or the pet food containing the pork meat etc. ingredients were:

- 1. Derived from the carcasses of swine that passed ante-mortem government inspection at slaughter.*
- 2. Manufactured in the following manufacturing facility approved by the USDA through regular on-site inspections for pet food/treat production and as meeting the "Animal Health Requirements for Pet Food/Treats Derived from Pork Exported to Japan from the United States"*: [insert name, address, and approval number of manufacturing facility].*

3. *Subjected to one of the following minimum heat treatments during production: 70 degrees Celsius for 30 minutes, 80 degrees Celsius for 9 minutes, or 90 degrees Celsius for 1 minute.*
4. *Packaged prior to export ready for retail sale for pet use.*
5. *Stored in a safe and sanitary condition from an animal health point of view until shipment to Japan .*

[insert ONE of the following]:

option one:

-Were exported directly from the manufacturing facility referenced above to Japan without storage in other facilities prior to shipment.

or

option two:

-Were stored at the following facility (or facilities) between manufacture and shipment to Japan: [insert name and address of any storage facilities where product was stored between leaving manufacturing facility and being exported to Japan].

**Dried pet foods produced through extrusion or hermetically sealed pet foods are not covered by the "Animal Health Requirements for Pet Food/Treats Derived from Pork Exported to Japan from the United States."*

<<<End "Additional Declarations" text.

The "Product" box of the VS Form 16-4 must include the following text: "Kind of container or packaging:" followed by a description of the container or packaging type; and "Manufacturing date(s):" followed by the manufacturing date(s). Also included must be the type of product, quantity, unit of measure, and species of origin.

In the **IDENTIFICATION BOX OF THE VS Form 16-4**, the following information must be included:

Container #: *[insert container #]*; Port of destination: *[Insert port of destination]*;
Seal #: *[Insert seal #]*; Expected shipping date: *[insert date product expected to leave port]*

Note: If the product does also contain dairy-origin ingredients, in addition to the above declarations on the VS Form 16-4, the "**Veterinary Certificate for raw milk and milk products from cloven-hoofed animals to be exported to Japan from the United States for**

animal consumption (not including extruded or retort processed pet foods) also containing animal-origin materials other than those derived from milk/milk products” must be added as additional pages to the VS Form 16-4, and after the “species” is identified on the first page of the VS Form 16-4, “dairy” should be inserted, e.g.: Bovine (dairy).

VIII. 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 retort processed) but that contain no animal origin ingredients other than dairy and/or fish (plus or minus powdered egg):

Products containing no animal origin ingredients other than fish (plus or minus powdered egg): 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 fish” (and if applicable) “and/or powdered egg.” [These products must contain at least fish ingredients.] Additional statements may not be added to the VS Form 16-4. **This does not include products that are produced through retort processing or extrusion for which no VS certification is required.**

Products containing no animal origin ingredients other than both fish and dairy (plus or minus 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 fish” (and if applicable) “and/or powdered egg”. [These products must contain at least fish ingredients.] Additional statements may not be added to the VS Form 16-4. Exception: For product containing dairy in addition to fish (or in addition to fish and powdered egg), the “**Veterinary Certificate for raw milk and milk products from cloven-hoofed animals to be exported to Japan from the United States for animal consumption (not including extruded or retort processed pet foods) also containing animal-origin materials other than those derived from milk/milk products**” must be added as additional pages to the VS Form 16-4. **This does not include products that are produced through retort processing or extrusion for which no VS certification is required.**

Products containing no animal origin ingredients other than dairy: These products should be accompanied by the “**Veterinary Certificate for raw milk and milk products from cloven-hoofed animals to be exported to Japan from the United States for animal consumption (not including extruded or retort processed pet foods) not containing any animal-origin materials other than those derived from milk/milk**”

products”. This does not include products that are produced through retort processing or extrusion for which no VS certification is required.

As always, 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.

IX. 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

Requirements for 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, are described 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 products produced through extrusion or retort processing.

X. Pet Food and Pet Treats/Chews that are NOT Produced through Extrusion or Retort Processing/Hermetically Sealed but that contain no animal origin ingredients other than fish

Japan does not require certification for pet food and pet treats that contain no animal-origin ingredients other than fish- even if those materials are not produced through extrusion or retort processing. It is recommended that prior to export the exporter have their importer check with the AQS Station through which the product will be imported into Japan to confirm that the available documentation (e.g. product labels) is sufficient for the AQS Station to verify that there are no other animal origin ingredients other than fish. APHIS does not issue certificates for these exports.

XI. 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.