

Pet Foods/Treats/Chews

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
http://www.fas.usda.gov/scripts/sw/fasfield/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.

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

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 Retort Processing/Hermetically Sealed that Contain NO Animal-origin Ingredients other than dairy and/or fish

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. [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.

VI. 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 are not produced through extrusion (exception – those that fall under the “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” section
- hermetically sealed products that were not produced through retort processing,
- products that are not shelf stable
- Freeze-dried products (other than ones that could receive the necessary certification from FSIS*). *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.