Manufacturing your own pet foods

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This guidance is for England

This guide covers the manufacturing of pet food, with particular emphasis on the domestic production of pet food and treats in your own home - for example, home-made dog biscuits.

Before you start manufacturing any pet food please contact your local trading standards service for advice as feed businesses, including all pet food manufacturers, must not operate without being registered or approved (as appropriate) with their local authority (usually the trading standards service).

Additionally, European Union (EU) regulations require the Animal and Plant Health Agency (APHA), as the competent authority, to approve manufacturing plants where pet food uses or incorporates products of animal origin - for example, eggs, meat, milk, butter, honey. This includes premises manufacturing pet food in domestic houses, even if using products of animal origin deemed fit for human consumption.

The pet food must be labelled with mandatory labelling requirements, which are sometimes still referred to as a 'statutory statement'.

What is a pet food?

A pet food is any product produced by a pet food manufacturer (even if produced in your own home) - whether processed, partially processed or unprocessed - intended to be ingested by pet animals after placing on the market. Usually pet food is in the form of a coarse mix, kibbles / biscuits, or as a wet food in tins or pouches, but it also includes, for example, dog cakes and other similar treats, and raw feed (frozen or fresh).
Manufacturing pet food

The pet food industry is highly regulated (see 'Key legislation' below), and this legislation applies equally to what can be described as commercial pet food manufacture on an industrial scale and to smaller scale manufacturers, perhaps in a person's private home or small unit.

Legislation on animal feed originates from the EU (rather than coming from the UK) and the overarching principle is that animal feed, including pet food, must be produced in hygienic conditions, and that the finished product is safe, is not harmful to animal or human health and is fully traceable. The main pieces of legislation to be considered in the manufacture of pet food, even in your own home, are described below.

EU Regulation (EC) No 183/2005 laying down requirements for feed hygiene requires that feed safety and hygiene be considered at all stages of the production of pet food, wherever this may be carried out. The Regulation sets out the operating standards to which all pet food manufacturers must comply. The Regulation summarises the feed hygiene requirements in terms of:

- facilities and equipment
- personnel
- production
- quality control including Hazard Analysis and Critical Control Point (HACCP - feed-safety management system)
- storage and transport
- record-keeping, including traceability
- complaints and product recall

All pet food manufacturers must also comply with EU Regulation (EC) No 767/2009 on the placing on the market and use of feed. This legislation covers matters such as:

- safety and marketing requirements. Special regard should be given to the species and type of pet you are manufacturing food for
- stringent labelling, presentation and packaging requirements, including analytical declarations
- manufacturer responsibilities
- substantiation of any claims, including nutritional claims
- prohibition on the misleading of purchasers
- prohibition on making medicinal claims

This Regulation also covers undesirable substances and particular nutritional purposes - for example:

- the maximum levels of various contaminants allowable in pet food (for example, arsenic, lead, dioxins and certain pesticides)
- certain substances that must not be used in feed

Regulation (EC) No 1831/2003 on additives for use in animal nutrition contains provisions for the control of additives in pet food. These controls relate to the additives (including vitamins, colourants, flavourings and binders) authorised for use in animal feed and cover matters such as:

- categorisation of feed additives
- authorisation of feed additives
- labelling and packaging of feed additives
- provisions relating to an EU register of additives

EU Regulation (EC) No 1069/2009 laying down health rules as regards animal by-products and derived products not intended for human consumption relates to animal by-products - for example, material of animal origin comprising those parts of animals that are either deemed surplus to human consumption or are not
normally consumed by people in the UK, and derived from animals inspected and passed as fit for human consumption prior to slaughter. It may also include products of animal origin - for example, eggs, milk, butter, honey, etc.

Animal materials or animal products of this nature, that are not intended for human consumption, are classified as 'animal by-products' under this Regulation (usually category 3 ABP). Such material must be free of any transmissible disease, which therefore excludes material from dying, diseased or disabled animals. Approval by APHA is required for pet food manufacturers using category 3 ABP. This includes premises manufacturing pet food in domestic houses or small units, whether using meat fit for human consumption or category 3 ABP.

You must not make pet food using:

- category 1 or 2 ABPs
- catering waste
- material from animals that passed inspection for disease before death but failed inspection after death

Information and guidance on the applicable legislation can be found on the Food Standard Agency website.

**Local authority registration or approval**

EU Regulation (EC) No 183/2005 *laying down requirements for feed hygiene* requires feed businesses to be approved or registered with their local authority, as appropriate (see how to apply for approval or registration on the Food Standards Agency website). This applies to all pet food manufacturers, regardless of scale, and they must not operate without such registration / approval.

EU Regulation (EC) No 183/2005 contains various conditions that pet food manufacturers have to comply with. The requirements of annex II of the Regulation (please scroll down the linked web page to see the annexes) must be complied with in relation to all pet food manufacture.

Registration with your local authority is free. If approval is required then a fee is payable.

**APHA approval for products incorporating products of animal origin**

If the manufacture of pet food, even in your own home, includes ingredients from products of animal origin and even if these products are fit for human consumption - for example, using ingredients bought direct from a supermarket - then APHA approval is required (in addition to local authority registration or approval). This arises from the fact that once the decision is made to use human foodstuffs containing products of animal origin in the manufacture of pet food, then this material becomes an ABP. APHA approval as a pet food plant is always required to handle such ABP.

For approval to be granted in, for example, a domestic home, strict separation of the pet food ingredients from food still intended for human consumption must be achieved at all stages of processing, in order to safeguard both human and animal health. Such separation may be achieved by having totally separate facilities - for example, a dedicated kitchen, work area and storage area - or by strict time separation with a fully documented clean-down programme. Hazards need to be controlled by a documented HACCP plan supplemented by prerequisite programmes.

A requirement of APHA approval is an ongoing microbiological testing regime for salmonella and enterobacteriaceae. This must be completed at a UKAS-accredited laboratory in accordance with ISO 17025 for ABP purposes. A search for compliant laboratories can be carried out on the UKAS website.
Further guidance on using animal by-products to make pet food can be found on the GOV.UK website.

Since 30 June 2018 there has been a statutory fee associated with obtaining APHA approval.

**Labelling**

Pet food must be labelled with both the general mandatory labelling requirements and specific mandatory labelling requirements as required by EU Regulation (EC) No 767/2009 on the placing on the market and use of feed.

Detailed information on the labelling requirements and labelling presentation of pet food can be found in 'The retail sale of pet food'.

**Guidance on the manufacture of safe pet foods**

The European Commission has formally recognised the FEDIAF Guide to Good Practice for the Manufacture of Safe pet Foods, produced by FEDIAF (Fédération Européenne de l'Industrie des Aliments pour Animaux Familiers - also known as the European Pet Food Industry Federation). The main aim of this document is to provide guidance to ensure that pet food is fit and safe for the purpose of feeding pets, whilst at the same time meeting the relevant requirements of European legislation. The guide covers the production, storage and distribution of pet food manufactured in Europe as well as third country imports into the EU, but should not be used as a replacement for the national regulatory requirements.

**Penalties**

Failure to comply with trading standards law can lead to enforcement action and to sanctions, which may include a fine and/or imprisonment. For more information please see 'Trading standards: powers, enforcement & penalties'.

**Key legislation**

- EU Regulation (EC) No 1831/2003 on additives for use in animal nutrition
- EU Regulation (EC) No 183/2005 laying down requirements for feed hygiene
- EU Regulation (EC) No 767/2009 on the placing on the market and use of feed
- Animal By-Products (Enforcement) (England) Regulations 2013
- Animal Feed (Composition, Marketing and Use) (England) Regulations 2015
- Animal Feed (Hygiene, Sampling etc and Enforcement) (England) Regulations 2015
- Animal By-Products and Pet Passport Fees (England) Regulations 2018

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Please note

This information is intended for guidance; only the courts can give an authoritative interpretation of the law.

The guide’s 'Key legislation' links may only show the original version of the legislation, although some amending legislation is linked to separately where it is directly related to the content of a guide. Information on amendments to UK legislation can be found on each link's 'More Resources' tab; amendments to EU legislation are usually incorporated into the text.

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Though not marked as relevant for Northern Ireland, the advice and guidance that applies to England can be taken to reflect the 'spirit' of the law in NI, but should not be relied upon without professional advice.

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