

Export of Pet Food with NO Bovinae Ingredients

Changes to Part IV of the Canadian Food Inspection Agency's (CFIA) Health of Animal Regulations pertaining to the importation of animal products, including pet food, are expected to be implemented and in effect by October 1, 2008. The provisions of CFIA's enhanced feed ban, which prohibits the feeding of bovine materials identified as specified risk materials (SRMs) to all animals, were implemented July 12, 2007.

Under the new regulatory requirements, all U.S. origin pet foods and pet treats which contain bovine (cattle, bison, buffalo) ingredients (except milk/dairy, protein free tallow and other ingredients identified by the OIE as essentially BSE risk free) will only be allowed entry into Canada with an import permit. Please see "Export of Pet Food Containing Bovine Ingredients" for more information on these pet foods.

Under the new regulatory requirements, all U.S. origin pet foods and pet treats which only contain poultry, fish, ovine, caprine, or cervid ingredients will be allowed entry into Canada with a list of ingredients and a notarized affidavit from the Canadian importer. These requirements also apply to pet foods and pet treats that only contain bovine ingredients recognized by the OIE as essentially BSE risk free (e.g., milk/dairy, protein free tallow).

Requirements

1. CFIA has not yet provided the official wording that will be required on the importer's affidavit, but it is APHIS VS understanding that the following will be required at a minimum:
 - a. The product does not contain specified risk materials (SRMs).*
 - b. The product was produced in a dedicated facility** or if there are SRMs in the facility, on a dedicated line*** with no possibility of cross-contamination.
 - c. (if applicable) The product contains protein free tallow (maximum level of insoluble impurities of 0.15% in weight).

*SRMs are defined as the skull, including the brain, trigeminal ganglia, eyes, spinal cord, dorsal root ganglia, and the vertebral column (excluding the vertebrae of the tail, the transverse processes of the thoracic and lumbar vertebrae, and the wings of the sacrum) from cattle (or other bovine – bison, buffalo) aged 30 months or older; and the distal ileum of the small intestine (i.e., the last 200 cm or 80 inches of the small intestine) and tonsils from cattle (or other bovine – bison, buffalo) of all ages.

**A dedicated facility is one that does not receive, store, or process any bovine materials considered to be SRMs

***To meet the requirements of a dedicated line there must be complete separation from materials/products that may contain SRMs from receipt of raw materials, through processing, storage and load out) to prevent any cross contamination of products intended for export to Canada with prohibited (SRM) materials.

Requirements, continued.

2. The importer's declaration must be notarized.
3. A list of ingredients must be provided.
4. If the product contains protein free tallow, the shipment should be accompanied by a Certificate of Analysis verifying that the tallow used in the product was tested and has a maximum level of insoluble impurities of 0.15% in weight. [This is a recommendation by CFIA to avoid delays in clearance at the border ports.]