

**August 2017 Submissions on the proposed  
Operational Code Petfood Processing Chapter 5**

Points MPI would like feedback on		MPI Response	
1.	Is the level of detail appropriate for the petfood sector?	I believe overall there is too much detail in the document. Much of the specific information should be determined by the RMP operators on a risk analysis basis. There are too many prescribed solutions, and not enough focus on desired outcomes. Examples below are 2.1, 5.3.1 and 5.3.2 Yes	Noted
2.	Are the technical aspects correct?	Overall good, but as above, too many prescribed solutions Yes	Noted
3.	Are the procedures practical and achievable for the petfood sector?	Yes, with the exceptions below Some concerns for some areas	Refer below
4.	Are there any areas that need more guidance?	Yes	Refer below

Clause	Comment	Proposed amendment	MPI Response
2.2 3(a)	Wording and specification of particular organisms (eg Salmonella spp, Listeria monocytogenes.....) indicates that all of these organisms should be treated as hazards for all manufacturers. I am concerned that this will override section 5.4 clause 3f. In our opinion, manufacturers should carry out hazard identification as part of sections 5.4 and 5.5. At this point they will identify which organisms need to be considered by their process and controls.	Remove reference to specific organisms. Alternatively place specific organisms in a guidance box	This clause has been removed as FEDIAF has now released new guidelines (2017 version) <a href="http://www.fediaf.org/self-regulation/safety.html">http://www.fediaf.org/self-regulation/safety.html</a> . This has an excellent description of potential hazards.
2.3 Table 1	Freeze dried petfood section does not specify that it also covers Freeze dried treats. Freeze dried treats are not covered elsewhere in the table	Please add the words “and treats” after the words “Freeze-dried petfood”	Agreed and amended.
3.2 (5)	Use of the words ‘the following’ twice within the one statement	The following must be documented <del>the following</del> in a petfood RMP:	Agreed and corrected
4.1 (1)	Reference to ‘[AP Spec 9.4 (1)]’	[APC Spec 9.4 (1)]	Agreed and corrected
4.1 (1)-(2)	When it comes to imported animal materials, such as seafood these suppliers do not source from regulated sources as their foreign entities. Nor are they registered or listed business as per part (2).	This section may need clarification in regards to imported sources.	Amended by inserting a new guidance box on Import Health Standards
4.2 (1)(a)	Incorrect spelling of the word ‘materials’	material <del>s</del>	Agreed and corrected
5.3.1 (3)	Many manufactured recipes contain a combination of meats/species which is diced/minced/ground through common equipment prior to mixing and retorting (in a pouch format), so cleaning between species not a practical requirement. There are dog and cat product recipes that share the same manufactured chunk component which means	Clarification as to whether these requirements are established for ‘raw petfood’ only.	Agreed and amended to be more outcome focussed

Clause	Comment	Proposed amendment	MPI Response
	there is no clean conducted between the two species intended products.		
5.3.1 (3)	Current text specifies cleaning between all different types of product (eg dog food and cat food). This needs to be determined on a case-by-case basis, as there are many cat and dog foods that have very similar makeups. There is no safety or labelling justification for carrying out a full clean between these products, and just pushes extra cost onto operators. Operators should be required to carry out an analysis of their products and justify which changeovers require full cleans.	Replace current text with “When necessary for product safety, cleaning of food contact surfaces and equipment should be undertaken between processing of different product types.”	
5.3.1 (3) 5.3.2 (5)	<p><b>Cleaning of food contact surfaces</b></p> <p>“Cleaning of food contact surfaces and equipment should be undertaken between processing of different species of meat, and between different types of product (e.g. dog food and cat food, “organic” petfood and normal petfood).”</p> <p><b>Effective separation</b></p> <p>“There should be effective separation to prevent cross-contamination between different types of products (e.g. raw and heat treated products, dog and cat food, “organic” petfood and normal petfood)”</p> <p>While we agree that appropriate cleaning and sanitation is required and cross-contamination needs to be controlled to maintain product and plant integrity, we think that these requirements may be too restrictive for some operators. It is highly likely that there will be situations where separation and cleaning between some products will not be necessary to maintain nutritional suitability and product safety, for example dog and cat</p>		Agreed and amended to be more outcome focussed

Clause	Comment	Proposed amendment	MPI Response
	<p>foods that are largely the same recipe with all ingredients being completely suitable if fed to the other species.</p>		
5.3.2 (2)	<p><b>Rooms used for the processing and storage of petfood.</b></p> <p>“Guidance – it is common practice in the meat industry for processing areas to be maintained at 12 °C or cooler, except when:</p> <ul style="list-style-type: none"> <li>• Conditions are sufficient to maintain the temperature of products at 7 °C or lower; and/or</li> <li>• Processing areas are used for thermal processing or where a higher temperature is not detrimental to product safety or is required for its manufacture”</li> </ul> <p>It is common practice in the Human Consumption meat industry for processing areas to be maintained at 12°C or cooler, however this is a new rule for Petfood and one that is difficult for processors to meet.</p> <p>There could be conditions to maintain the temperature of products at 7 °C or lower, but outside of direct processing, this would mean chilled rooms.</p> <p>Consideration should be given to processors who cannot meet this requirement.</p>		<p>Agreed and mended by re-wording to focussing on product temperature</p>
5.3.2 Guidance box	<p>I believe the information in this box is unnecessary, and could cause confusion. 5.3.2 clause 2 correctly states that operators must facilitate proper temperature control of raw materials and products. Operators should be left to demonstrate how they achieve this, rather than have a uniform prescription. I understand that this is guidance only, but these commonly get used as a benchmark, rather than focussing on the required outcomes.</p>	<p>Remove this guidance box</p>	<p>As above</p>

Clause	Comment	Proposed amendment	MPI Response
5.3.3	<p><b>Purchase, receipt and storage of raw materials, ingredients and packaging.</b></p> <p>(2) refers back to Part 13: Chapter 2 : Good Operating Practice</p> <p>While this does not relate to our process, the following alternative cooling method appears difficult to achieve:</p> <p>“An example of an alternative cooling method is the continuous cooling of offal by packing them in bulk bins with ice and transporting them in this state.”</p> <p>Although it is already written into Chapter 2, we suggest further consultation is taken with Petfood manufacturers dealing with offal to assess how practical this is.</p>		<p>This is an example of cooling of offal. This topic was discussed at the time during consultation of Chapter 2 with an operator who undertook this practice and the resulting text was agreed. There should be no further need to consult on this.</p>
5.4 (6)	<p><b>Product design and formulation</b></p> <p>“Shelf-life should be established, taking into account the petfood formulation, process, packaging and subsequent storage conditions.”</p> <p>Consideration should be given to allow Petfood processors an appropriate amount of time to establish shelf life, as it is difficult to accelerate shelf-stable products accurately.</p>		<p>Amended to include a guidance box of how this can be met</p>
6.6 (3)	<p><b>Mixing</b></p> <p>“Where necessary for product safety, the temperature of the mix should be controlled”</p> <p>This requires equipment and methodology that most Petfood manufacturers do not have and seems more in line with the Human Consumption standard.</p>		<p>A guidance box has been inserted to explain the intent of this clause</p>
8.8	<p><b>Storage</b></p> <p>(1) “Chilled products should be maintained at <math>\leq 5^{\circ}\text{C}</math> and frozen products at <math>-12^{\circ}\text{C}</math> or cooler.”</p>		<p>This is the FEDIAF recommended storage temperatures. If an operator chooses a different temperature regime this should be e.g. part of shelf-life determination</p>

Clause	Comment	Proposed amendment	MPI Response
	Can most petfood manufacturers meet this requirement as again it appears closer to the Human Consumption standard then for Petfood?		