PET FOOD SAFETY GUIDELINES LOCAL MANUFACTURERS & PET FOOD TRADERS

Agriculture, Fisheries and Conservation Department

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1. Purposes

- This guideline primarily includes recommendations on the safe production, labelling, and storage of pet food for reference by local pet food manufacturers and traders, including small-scale or family-run businesses. We encourage relevant pet food manufacturers and traders to adopt these recommendations to enhance the pet food safety in Hong Kong and promote the healthy development of the pet food industry.

2. Definition

- Pet Food: Any food that is prepared for pets and provided for their consumption. For example, pet food for common pets such as cats, dogs, birds, and rabbits.

- Equipment: Devices, containers, vessels, machines, instruments, or tools used for storing, handling, cooking, and cleaning of food.

- Pest: Any animal or insect that may contaminate food, for example, rats, mice, cockroaches, and flies.

- Sanitize: Apply heat and/or chemicals to destroy micro-organisms, including all pathogens.

- Contamination: The presence or introduction of unwanted or harmful substances in food (such as foreign object, pathogenic microorganisms, chemical agents, or other substances), which may jeopardize the safety or suitability of the food.

- Cross-contamination: Transfer of micro-organisms or contaminants from one food (usually raw) to another food either directly when one food touches another, or indirectly through hands or equipment.

- Complete and Balanced Nutrition: The nutrition is comprehensive and balanced, meeting the recommended nutritional requirements for pets.

- Temperature Sensitive Products: Products that can rapidly lose nutritional values, deteriorate, or pose safety risks when stored under inappropriate temperature conditions.

- Dry Food: Solid, granular pet food with low moisture content (typically less than 10 %). It is usually produced through processes like extrusion, heating, compression, and drying.

- Wet Food: Soft, high-moisture pet food (usually 60 % or more), sold in sealed containers such as cans or vacuum-sealed pouches.

- Semi-Moist Food: Pet food with an intermediate moisture level, generally falling between that of dry and wet foods.

- Traceability: The ability to track and record the origin, movement, and relevant details of a product across every stage of its lifecycle, from raw material sourcing through manufacturing, processing, distribution, and delivery to the final consumer.

- Product Recall: A measure in which manufacturers or suppliers voluntarily withdraw and handle products already on the market due to safety risks, quality issues, or other serious defects.

3. Local Pet Food Manufacturers

3.1 Document Management

3.1.1 Document Management System

- Establish a comprehensive document management system to develop and record all safety and quality monitoring procedures, factory layout, equipment details, production processes, production records, etc., ensuring that the information is complete and easily traceable.

3.1.2 Document Updating and Recordkeeping

- Review and update documents regularly to reflect the latest operational practices. Retain all records, including raw materials, supplier details, production processes, distribution, and batch numbers, to ensure traceability.

3.2 Management of manufacturing facilities

3.2.1 Facility Design

- Design and construct the premises properly to prevent pests effectively. The premises shall provide enough space for pet food manufacturing activities to reduce contamination risks. Separate the areas for raw material storage, processing, and finished product handling to avoid cross-contamination. Use

durable, easy-to-clean materials for walls, floors, and ceilings to facilitate daily cleaning and maintenance.

3.2.2 Maintenance and Cleaning

- Inspect and maintain equipment regularly to prevent contamination by foreign objects (such as broken parts). Establish a proper cleaning and disinfection programme for the facility, covering aspects such as cleaning areas, frequency, and methods, to ensure the removal of dirt and debris, the elimination of microorganisms, and the thorough clearance of cleaning agent residues.

3.2.3 Waste Disposal

- Use covered trash bins and remove waste promptly to prevent contamination and pest infestation.

3.2.4 Drainage System

- Design and construct the drainage system properly to reduce the risk of contaminating materials or products.

3.3 Raw Material Management

3.3.1 Purchasing

- Procure raw materials from reliable suppliers and verify them through relevant certifications, valid business registrations, and supporting documentation. On-site inspections may be conducted when necessary and applicable.

3.3.2 Raw Material Inspection

- Establish incoming inspection procedures to verify whether received raw materials meet specifications, such as moisture content, colour, odour, and shelf life. Record all inspection results and reject non-conforming materials. Conduct periodic supplier audits to ensure consistency in quality.

3.4 Manufacturing Process Control

3.4.1 Quality Assurance System

- Design and implement a food safety management system properly, such as one based on Hazard Analysis and Critical Control Points (HACCP) or an equivalent

system (ISO 22000, to monitor, verify, and validate production processes, ensuring the consistent production of safe, nutritionally adequate, and high-quality pet food.

3.4.2 HACCP System

- The HACCP system is a systematic and scientific approach used in food production process to identify, assess and control various hazards. With the HACCP system, food safety control is integrated into every stage of food production. This system serves as a preventive method that helps ensure food safety in a cost-effective approach.

- Various hazards may occur during the pet food production process. Manufacturers can apply the seven principles of the HACCP system to effectively control different types of hazards:

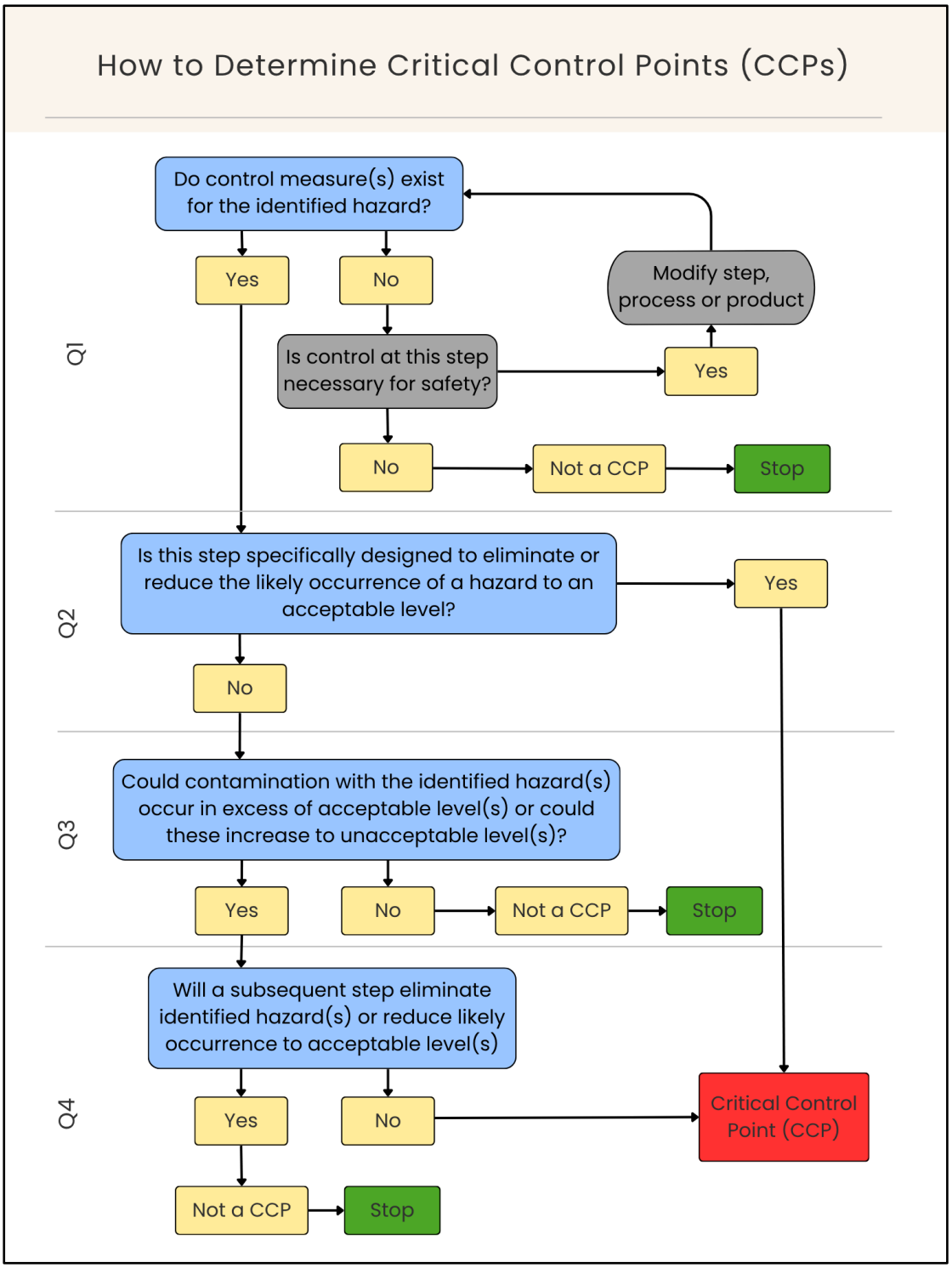
    1. Conduct a hazard analysis
    2. Determine the critical control points (CCPs)
    3. Establish critical limits for each CCP
    4. Establish monitoring procedures for each CCP
    5. Establish corrective actions
    6. Establish verification procedures to validate the HACCP plan
    7. Establish record-keeping and documentation procedures

- The table below lists some common hazards in pet food production and the corresponding control measures:

Process / CCP	Types of Hazards	Hazards	Control Measures
Raw Material Specifications	Chemical Hazard	Heavy metals, mycotoxins, pesticide residues	Procure raw materials from approved suppliers, conduct contaminant testing, and monitor production processes
Raw Material Storage	Biological Hazard	Contamination or spoilage (e.g., moisture leading to microbial growth, contamination by pests such as insects or rodents)	Ensure proper storage conditions, perform regular inspections, measure moisture content, and maintain strict hygiene standards

Processing	Biological Hazard	Microbial growth due to incorrect processing	Monitor and verify processing time and temperature, and implement effective shelf life control
Mixing	Physical Hazard	Foreign matter contamination caused by accidental mixing of foreign objects or mechanical damage (e.g., glass, metal, plastic)	Maintain equipment in good condition, establish glass-free production zones, use metal detectors, and provide comprehensive employee training
Heating	Biological Hazard	Insufficient sterilization capacity leading to survival and growth of harmful microorganisms (e.g., when product heating time is too short or temperature is too low)	Control and monitor heating conditions (e.g., temperature, pressure, and time)
Drying and Cooling	Biological Hazard	Contamination or spoilage, microbial growth	Comply with defined drying and cooling requirements (temperature and duration), and measure moisture and product temperature
Packaging	Biological Hazard	Contamination due to compromised packaging	Conduct visual inspections and implement a robust quality assurance program
Product Storage	Biological Hazard	Contamination or spoilage	Store finished products appropriately, manage shelf life, and uphold hygiene requirements

- To determine the CCPs, the following decision tree can be applied. This supports effective HACCP system implementation and helps ensure the safety of the pet food produced.



- For further information on the HACCP system, you may refer to the introduction provided by the Food and Agriculture Organization of the United Nations: *https://www.fao.org/good-hygiene-practices-haccp-toolbox/haccp/introduction-to-haccp/en*

3.4.3 General Precautions for Pet Food Manufacturing

- Dry Food
    a. The manufacturing process may include receiving, initial inspection, and raw material handling, mixing and grinding, extrusion, drying, cooling, coating, metal detection, packaging, and storage.
    b. Based on the characteristics of the raw materials, inspect using magnets, sieves, and visual examinations to prevent the introduction of foreign objects (such as metal, glass, bones).
    c. During the extrusion process, strictly control the temperature, time of heating, and pressure to ensure all microorganisms are completely eliminated.
    d. Ensure the product is dried to the target moisture content level (e.g., below 10%) to prevent microbial growth.
    e. Maintain storage areas under proper environmental conditions, including temperature, humidity, and moisture control, to ensure product quality and stability. Record environmental monitoring data regularly.

- Semi-Moist Food
    a. The manufacturing process may include receiving, initial inspection, and raw material handling, chopping and mixing, heating, extrusion, drying, cooling, metal detection, packaging, and storage.
    b. Based on the characteristics of the raw materials, inspect using magnets, sieves, and visual examinations to prevent the introduction of foreign objects (such as metal, glass, bones).
    c. When using perishable ingredients such as meat or fish, strictly control temperature to ensure that storage and processing remain within regulated ranges to prevent microbial growth.
    d. During heating and related processes, strictly control temperature and time to ensure all microorganisms are completely eliminated.
    e. Ensure the product is dried to the target moisture content level (e.g., around 20%) to prevent microbial growth.
    f. Maintain storage areas under proper environmental conditions, including temperature, humidity, and moisture control, to ensure product quality and stability. Record environmental monitoring data regularly.

- Wet Food
    a. The manufacturing process may include receiving, initial inspection, and raw material handling, ingredient mixing and processing, metal detection, canning, sealing, high-temperature sterilization, cooling, packaging, and storage.

b. Based on the characteristics of the raw materials, inspect using magnets, sieves, and visual examinations to prevent the introduction of foreign objects (such as metal, glass, bones).
c. Monitor for insufficient degassing, container deformation, or bulging at the sealing area, ensuring containers are not damaged by external force to prevent contamination due to incomplete sealing.
d. To prevent microbial contamination, strictly implement the canning and sealing process to ensure an airtight seal. After sealing, test the integrity of the seal to confirm compliance.
e. After thawing or removal from refrigeration, raw materials should be sterilized promptly to prevent microbial growth. Sterilization conditions (including temperature, time, and pressure) must be verified and strictly followed.
f. Maintain storage areas under proper environmental conditions, including temperature, humidity, and moisture control, to ensure product quality and stability. Record environmental monitoring data regularly.

- Others
    a. Common processing methods for raw pet food, such as freeze-drying, air-drying, or freezing, can only reduce but not completely eliminate harmful microorganisms in the food. Please note the higher risk of bacterial contamination (e.g., Salmonella, E. coli, Listeria).
    b. Protect products from pathogenic microbial contamination, and conduct regular sampling tests to confirm the effectiveness of sterilization procedures.
    c. Cross-contamination can easily occur during thawing, preparation, or repackaging. Ensure good hygiene practices to prevent the spread of bacteria.

3.5 Hygiene Management

3.5.1 Cleaning

- Clean and disinfect the premises daily, including equipment and facilities. Properly handle and dispose of cleaning residues to prevent contamination.

3.5.2 Personal Hygiene

- Provide appropriate personal protective equipment (PPE), such as work clothing, footwear, gloves, masks, and hairnets, to employees as necessary. Conduct hygiene management training, covering proper handwashing procedures and the correct use of protective equipment.

- Provide employees with adequate handwashing facilities, toilets, and changing rooms, and ensure these facilities meet hygiene standards.

3.5.3 Pest Control

- Conduct regular inspections of the premises to detect early signs of pest activity. Implement control measures promptly when infestations are identified, such as the use of traps or engagement of professional pest control services.

3.6 Storage

3.6.1 Storage Condition

- Upon delivery, raw materials should be stored as soon as possible in clean and well-ventilated storage areas, or under designated storage conditions, to prevent spoilage, contamination, or damage.

- Store raw materials and finished products in cool, dry, and well‑ventilated areas, away from direct sunlight, high humidity, and pests. Maintain strict temperature control, such as keeping refrigerated items at 4°C or below, and frozen items at -18°C or below.

- Seal containers securely to prevent moisture and pests. Under hot and humid conditions, inadequately handled raw pet foods (such as raw pet food) may experience rapid pathogen growth during transportation or storage, which may affect pet health.

3.6.2 Storage Separation

- Store raw pet food separately from cooked or processed pet food to avoid cross-contamination.

3.6.3 Inventory Rotation

- Implement a “First In, First Out (FIFO)” or “First Expired, First Out (FEFO)” inventory system to ensure older stock is used first. Inspect stored products regularly for signs of damage, spoilage, or expiry.

3.7 Nutrition

- Pet food should meet the specific nutritional needs of different pets and match its declared purpose. When producing products formulated as "Nutritionally Complete Pet Food", manufacturers should refer to the latest internationally recognized nutritional standards. Products not intended as nutritionally complete diets, such as complementary foods or treats, should be clearly labelled with terms such as "for occasional feeding," "supplementary food," "snack," or equivalent. Such products should not be used as the sole diet and should include clear feeding instructions.

3.8 Pet Food Labelling

- To ensure consumers receive accurate and sufficient information about pet food for the health and safety of their pets, prepackaged pet food label should include the following information, clearly and legibly displayed in English, Chinese, or both languages:
    1. Name of the pet food
    2. List of ingredients
    3. Nutritional composition and content (crude protein, crude fat, crude fibre, moisture)
    4. Quantity, weight, or volume
    5. Date of manufacture and shelf life
    6. Name and address of the local manufacturer or importer
    7. Storage or usage instructions

- A font size of at least 1.2mm (x-height) for English letters and Chinese characters of comparable size is recommended. If packaging design limits space for larger text, a minimum font size of at least 0.8 mm (x-height) for English letters and 1.8mm total height for Chinese characters should be used.

3.8.1 Name of the Pet Food

- Pet food names generally describe the target animal and the product's intended use, and some also specify the main ingredients. Examples include:
    - Indoor Adult Cat Formula
    - Dog Complete Meal – Chicken + Vegetables
    - Freeze-Dried Chicken Bites – Cat & Dog Treat
    - Hamster Sunflower Seeds Vegetable Nutritional Food

- If the product name does not directly indicate the target animal, this information should be provided elsewhere on the label.

3.8.2 List of Ingredients

- List all ingredients (including additives) in descending order by weight or volume at the time of packaging.
- Examples include:
    - Corn, dehydrated poultry protein, rice, animal fat, wheat gluten, hydrolyzed soy protein isolate, hydrolyzed animal protein, corn gluten, vegetable fibre, yeast products, minerals, beet pulp, soybean oil
    - Corn, barley, sunflower hulls, wheat flour, vegetable by-products, soybean meal, vitamins, colors
    - Chicken, pearl barley, brown rice, pea fibre, corn protein powder, dried tomato pomace, oat fibre, chicken liver flavor, flaxseed, dried beet pulp, coconut oil, pork flavor, lactic acid, potassium chloride, L-lysine, carrot, iodized salt, thiamine sulfate, choline chloride, vitamins (vitamin E supplement, vitamin B12 supplement, vitamin D3 supplement), minerals (manganese sulfate, ferrous sulfate, zinc oxide, calcium iodate), taurine, natural flavors, β-carotene

3.8.3 Nutritional Composition and Content (crude protein, crude fat, crude fibre, moisture)

- State the main nutritional components (crude protein, crude fat, crude fibre, moisture) in percentages. Other key nutrients, such as calcium, phosphorus, or calories, may be added if necessary.
- Examples include:
    - Crude Protein 33%, Crude Fat 16%, Crude Fibre 3.1%, Moisture 10%
    - Crude Protein 14.5%, Crude Fat 2%, Crude Fibre 0.1%, Moisture 81%, Calories 69.15 kcal/100g
    - Crude Protein 17.0%, Crude Fat 1.0%, Crude Fibre 15.0%, Crude Ash 8.0%, Moisture 10.0%, Calcium 1.0%, Phosphorus 0.55%

3.8.4 Quantity, Weight, or Volume

- Specify the quantity, net weight, or net volume of the food.
- Examples include:
    - 2kg
    - 10g x 4

- 200ml

3.8.5 Manufacturing Date and Shelf Life

- Clearly mark the manufacturing date in the “Day Month Year” / “DD MM YY” format.
- Examples include:
  - Manufacturing Date: 06/11/2026
  - MFG: 06 11 26
- The shelf life should be expressed as “Use By” or “Best Before” (depending on the situation), and marked in the “Day Month Year” / “DD MM YY” format. “Use By” relates to food safety and is mostly used for microbiologically highly perishable foods. After this date, the product is considered unsafe. “Best Before” relates to food quality. It indicates that if the food is properly stored, it can reasonably be expected to retain its specific properties up to and including the specified date. After this date, the food may have lost some of its quality, but consumption may still be acceptable depending on the actual condition.
- Examples include:
  - 此日期或之前食用: 31 / 12 / 2027
  - USE BY: 31 / 12 / 2027
  - 此日期前最佳: 31 12 27
  - BEST BEFORE: 31 12 27

3.8.6 Name and Address of the Local Manufacturer or Importer

- List the full name and address of the manufacturer or importer.

3.8.7 Storage or Usage Instructions

- Explain the product’s storage method and usage instructions.
- Examples include:
  - Store in a cool, dry place, away from direct sunlight. Consume as soon as possible after opening.
  - Store in a cool and dry place; for reward or supplemental feeding only; do not replace a complete meal; Adjust daily feeding amount according to weight.
  - Daily Feeding Guide

	cup（s）	gram
5lb（2.3kg）	$^{1}/_{2}$	50

10lb（4.5kg）	$^{7}/_{8}$	85
20lb（9.1kg）	$1\,^{1}/_{2}$	150
30lb（14kg）	2	200
40lb（18kg）	$2\,^{1}/_{2}$	250
50lb（23kg）	3	295
60lb（27kg）	$3\,^{1}/_{3}$	330
80lb（36kg）	4	395
100lb（45kg）	$4\,^{3}/_{4}$	470

3.9 Handling of Product Irregularities

- If any pet food safety issues are identified, such as contamination, the manufacturers should promptly contact customers to initiate a recall and advise them to cease selling or using the product. Manufacturers should also provide customers with clear instructions on how to return or dispose of the affected items.

4. Pet Food Traders

4.1 Record Keeping

- Properly maintain records of all sales, purchases, complaints, and returns to ensure traceability.

4.2 Product Source and Supplier Verification

4.2.1 Supplier Selection

- Procure pet food from reputable manufacturers, importers, or wholesalers holding relevant certifications. Imported pet foods should comply with the safety requirements of their place of manufacture.

4.2.2 Product Origin

- Ensure that imported products come with valid documentation from the place of manufacture. Maintain and regularly update the supplier list, including supporting documents such as business licenses, quality accreditations, and product registrations.

4.2.3 Pet Food Labelling

- Procure pet food with proper labelling to ensure consumers receive accurate and sufficient product information, which helps safeguard the health and safety of pets. For details on pet food labelling, please refer to Section 3.8 of this Guideline.

4.3 Product Receipt and Inspection

4.3.1 Delivery Inspection

- Inspect each consignment immediately upon receipt. Verify product type, quantity, batch number, and expiry date against delivery documentation. Reject products exhibiting damage, punctures, broken seals, swollen cans, mold, or discoloration.

4.3.2 Temperature-Sensitive Products

- Ensure pet food that needs to be refrigerated or frozen arrives within the right temperature range. For example, refrigerated food should be kept between 0 °C to 4°C, while frozen food should be kept at -18°C or below. Do not accept products that show signs of thawing.

4.4 Hygiene Management

4.4.1 Cleaning

- Maintain the premises in a clean and hygienic condition.

- Provide appropriate protective equipment such as gloves and masks to employees as necessary. Train employees on hygiene management, including proper handwashing and how to correctly use protective equipment.

4.4.2 Pest and Rodent Control

- Implement a pest control programme and keep storage and display areas clean. Establish cleaning and disinfection schedules for stores, display areas, and equipment using suitable cleaning agents.

4.5 Storage

4.5.1 Storage Conditions

- Store pet food in a cool, dry, and well-ventilated environment, away from direct sunlight and high humidity. Follow manufacturer's storage instructions. Keep refrigerated products between 0°C to 4°C, and frozen products at -18°C or below.

4.5.2 Storage Separation

- Store pet food separately from cleaning chemicals, pesticides, and other contaminant sources. Separate raw pet foods from cooked or processed products to prevent cross-contamination.

4.5.3 Re-packaging

- Do not open or repackage pet food for sale unless authorized by the manufacturer or as instructed on the packaging. Perform all repackaging processes in a clean and hygienic environment, clearly label the repackaged product's conditions, and maintain records to ensure traceability.

4.6 Inventory Management

4.6.1 Product Expiry

- Regularly check products that are nearly expired, and remove any expired items from shelves for proper disposal.

4.6.2 Inventory Rotation

- Implement a "First In, First Out (FIFO)" or "First Expired, First Out (FEFO)" inventory system to ensure older stock is used first. Inspect stored products regularly for signs of damage, spoilage, or expiry.

4.6.3 Handling of Product Irregularities

- Maintain comprehensive sales records, including batch numbers to facilitate product recalls. If any product abnormalities are identified, immediately remove the items from shelves and stop all sales. Contact suppliers and affected customers to coordinate the necessary follow-up actions.