Notice to Pet Food Manufacturers/Importers/Distributors

For Securing Safety of Pet Foods

Purpose of the Act on Ensuring of Safety of Pet Food ("Pet Food Safety Act")

The Act regulates the manufacture, import and sale of pet foods by setting standards for manufacturing methods and labeling as well as compositional specifications for pet foods. By these regulatory measures, the Act aims to secure safety of pet foods and thereby to protect the health of pets and to contribute to animal welfare.

Overview of Pet Food Safety Act

○ Pet Foods to be Regulated by the Act
  Food to be consumed by dogs and cats, including snacks, gum, supplements, mineral water, in addition to general pet foods, but excluding pharmaceuticals for animals. (Pharmaceuticals for animals are outside the scope of the Act, as they are regulated by the Act on Securing Quality, Efficacy and Safety of Products Including Pharmaceuticals and Medical Devices.)

○ Setting of standards and specifications for pet foods
  The Ministry of Agriculture, Forestry and Fisheries (MAFF) and the Ministry of Environment (MOE) may set standards for manufacturing methods and labeling as well as compositional specifications for pet foods, and prohibits manufacturing, import or sale of pet foods not conforming to these standards and specifications.

○ Prohibition of manufacturing, etc. of pet foods containing harmful substances
  Manufacturing, import or sale of pet foods containing harmful substances is prohibited.

○ Order for disposal, etc. of pet foods
  MAFF and MOE order business entities engaged in sale, etc. of pet foods not conforming to the standards / specifications or containing harmful substances to dispose or recall such pet foods.

○ Notification of manufacturers, etc.
  Importers and manufacturers of pet foods are required to make a notification of its name, name of its business establishment, etc.

○ Record-keeping
  Importers, manufacturers and distributors (excluding retailers) of pet foods are required to keep records of names, quantities, etc. of pet food it handles.

○ Order to submit report and on-site inspection
  MAFF, MOE and the Food and Agricultural Materials Inspection Center (FAMIC) may order submission of a report from, and conduct an on-site inspection of, importers, manufacturers and distributors, etc. of pet foods.

Ministry of Agriculture, Forestry and Fisheries

Aug. 2017
**Brief Summary of Regulations**

**Notification**

- Importers and manufacturers of pet foods (both corporations and individuals) are required to make a notification before engaging in the relevant business activities.
- A notification must be submitted to a competent office, such as a Regional Agricultural Administration Office of the prefecture where the principal office is located (see the list).
- Any change in the notified information or suspension or acquisition of business must be promptly reported.

**Documents necessary for notification**

- Notification (one original, and one or two copies as may be necessary).
- A document evidencing existence of the business entity (e.g. a certified copy of commercial registration)

※Please see the MAFF website for further details or to download the notification format.

**Record-keeping**

- Importers, manufacturers and wholesalers of pet foods are required to create records of names, quantities, etc. of pet foods it imports, manufactures and sells by means of books or computer, and keep such records for two years.

**Case where record-keeping is required/Items for recording**

**Import of pet foods**

- Name/quantity of pet foods
- Year/month/date of import
- Exporting country/exporter name
- Mode of packing of pet foods
- Country of manufacture/name of manufacturer/ingredients of pet foods

**Manufacturing of pet foods**

- Name/quantity of pet foods
- Year/month/date of manufacturing
- Name/quantity of ingredients
- Year/month/date of acquisition of ingredients/name of ingredients supplier

**Sale of pet foods to business entities**

- Name/quantity of pet foods
- Name of purchaser
- Year/month/date of sale of pet foods
- Mode of packing of pet foods

**On-site Inspection**

- MAFF, MOE and FAMIC may conduct an on-site inspection of importers, manufacturers and distributors, etc. generally without any advance notice.
- At the on-site inspection, verification is made as to the status of record-keeping or whether the pet foods imported or manufactured conform to the relevant standards and specifications.
- MAFF, MOE and FAMIC may take samples for analysis purpose.
For pet foods, Japanese labeling of the name, best before date, ingredients, country of origin, and name/address of the business is required.

Example of Labeling

1. **Name**
   - Product name of the pet food. The name must be represented in a way which enables distinction between pet foods for dogs or cats.
   - If it is not clear from the product name whether the product is for dogs or cats, such information should be represented together with the product name. Or, it is also acceptable to provide such information on a general information label, e.g., “成犬用総合栄養食”.

2. **Best before date**
   - Indicate year/month/date or year/month. Ex. 2010 08

3. **Ingredients**
   - In principle, all ingredients used (including additives) must be listed. The Pet Food Safety Act does not specifically provide for an order for listing ingredients, however, from the standpoint of providing appropriate information to consumers, descending order according to the quantity of the ingredient would be appropriate.
   - In the case where additives such as sweeteners, coloring agents, preservatives, viscosity stabilizing agents or antioxidants are used, both the names of the additives and purposes need to be listed.
   - E.g. Antioxidant (mixed tocopherol)

4. **Country of origin**
   - The country where the production process involving substantial change was finally completed

5. **Name and address of business entity**
   - List the following information:
     - Type of business entity (manufacturer, importer or distributor)
     - Name
     - Address

Please also see the following websites for further details of pet food labeling:

- Enforcement of the Act on Ensuring of Safety of Pet Food (in Japanese)
  (in particular, standards specified in Section III, paragraph 3, item (3) (Appendix 3 to the Ministerial Ordinance on Compositional Specifications, etc. for Pet Foods)

- Q&A on Pet Food Safety Act (in Japanese)

- Country of origin on labeling of pet foods

**Laws and Regulations Other Than Pet Food Safety Act**

Some ingredients contained in pet foods and labeling may require consideration as pharmaceuticals for animals. Please see the following website to confirm whether a product is regulated by the Act on Securing Quality, Efficacy and Safety of Products Including Pharmaceuticals and Medical Devices.

- View on question as to whether a product is treated as a pharmaceutical for animals (MAFF)

- Pet Food Fair Trade Association (http://www.pffta.org/hyouji/guidelines.html)
The following safety standards have been set so as to secure safety of pet foods, taking into consideration scientific knowledge.

Pet foods must not contain any of the following substances in excess of their respective maximum levels.

<table>
<thead>
<tr>
<th>Type</th>
<th>Substance</th>
<th>Maximum levels (µg/g)</th>
<th>(Note)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mycotoxin</td>
<td>Aflatoxin B₁</td>
<td>0.02</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Deoxynivalenol</td>
<td>2 (for dogs), 1 (for cats)</td>
<td></td>
</tr>
<tr>
<td>Heavy metal, etc.</td>
<td>Cadmium</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Lead</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Arsenic</td>
<td>15</td>
<td></td>
</tr>
<tr>
<td>Organic chlorine compounds</td>
<td>BHC</td>
<td>0.01 (total quantity of α-BHC, β-BHC, γ-BHC and δ-BHC)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>DDT</td>
<td>0.1 (including DDD and DDE)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Aldrin/dieldrin</td>
<td>0.01 (total quantity)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Endrin</td>
<td>0.01</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Heptachlor/heptachlor epoxide</td>
<td>0.01 (total quantity)</td>
<td></td>
</tr>
<tr>
<td>Pesticides</td>
<td>Chlorpyrifos-methyl</td>
<td>10</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Pirimiphos-methyl</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Malathion</td>
<td>10</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Methamidophos</td>
<td>0.2</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Glyphosate</td>
<td>15</td>
<td></td>
</tr>
<tr>
<td>Additives</td>
<td>Ethoxyquin/BHA/BHT</td>
<td>150 (total quantity)</td>
<td>For dogs, ethoxyquin must be 75 µg/g or less.</td>
</tr>
<tr>
<td></td>
<td>Sodium nitrite</td>
<td>100</td>
<td></td>
</tr>
<tr>
<td>Others</td>
<td>Melamine</td>
<td>2.5</td>
<td></td>
</tr>
</tbody>
</table>

(Note) Maximum levels are relative to pet foods with a moisture content of 10%. The unit for additives is g/t.

Pet foods must be manufactured in compliance with the following standards:

<table>
<thead>
<tr>
<th>Type</th>
<th>Substance</th>
<th>Standards</th>
</tr>
</thead>
<tbody>
<tr>
<td>Harmful microorganisms</td>
<td>Harmful microorganisms (in general)</td>
<td>Heating or drying must be applied by a method having sufficient effect for eliminating microorganisms generating from or growing in ingredients, etc.</td>
</tr>
<tr>
<td>Additives</td>
<td>Propylene glycol</td>
<td>Must not be used for cat foods.</td>
</tr>
<tr>
<td>Ingredients (in general)</td>
<td>Other harmful substance, etc.</td>
<td>Ingredients which actually or potentially contain any harmful substances or are contaminated by pathogenic microorganisms must not be used.</td>
</tr>
</tbody>
</table>

【Review of Safety Standards】
MAFF will continue to make efforts in gathering scientific knowledge, and add the regulated substances and review the thresholds as necessary.