



USDA Foreign Agricultural Service

GAIN Report

Global Agriculture Information Network

Template Version 2.09

Voluntary Report - Public distribution

Date: 1/21/2009

GAIN Report Number: IT9002

Italy

FAIRS

Pet Food Export Requirements to Italy

2009

Approved by:

Jim Dever
U.S.Embassy

Prepared by:

Dana Biasetti

Report Highlights: All U.S. pet food exported to Italy must comply with EU rules, including labeling, hygiene, animal health, certification, and the use of additives. In addition, all pet food production facilities and pet food ingredient facilities must be APHIS inspected and approved for compliance with EU export rules.

Includes PSD Changes: No
Includes Trade Matrix: No
Annual Report
Rome [IT1]
[IT]

Complexity of Exporting to Italy and the EU

The export of U.S. manufactured pet food to Italy and the EU in general is extra-ordinarily difficult due to the following:

- The EU has extremely complex requirements for the importation of pet food.
- Those U.S. manufacturers who wish to export pet food to the EU, must begin planning well in advance of the production of the product. They must source only certain ingredients from certain approved suppliers, and must produce the materials under stringent EU requirements and specific processing parameters.
- When a U.S. manufacturer is interested in applying for the necessary approval, they should contact the APHIS Area Office for the state in which the production facility is located for more information.
- The approval process is lengthy, and the product cannot be exported until when, and if, the approval is granted.
- Italy has additional requirements – the importer should always ensure that the producer is on the required list and all required export certification has been received prior to shipping.

Italian Pet Food Legislation

All U.S. pet food exported to Italy and the EU must comply with EU rules on labeling, hygiene, animal health, certification, use of additives, etc.

In addition, all U.S. pet food production facilities and pet food ingredient facilities must be APHIS (Animal Plant and Health Inspection Service) inspected and approved for compliance with European rules in order to be allowed to export pet food to EU countries and Italy. Once a facility is inspected by APHIS it is included in a list that is transmitted to the border authorities of the EU country. Unfortunately at the moment the EU does not have a harmonized list, which means that there is no one single list for all of the EU member states.

The Italian Ministry of Health requires that APHIS provide two separate lists of authorized U.S. pet food exporters:

1. Approved Pet Food Facilities list, and
2. Approved Pet Food Ingredients lists

APHIS and the Italian Ministry of Health work with FAS/Rome to update and maintain these lists. Once the approved lists are received by the Italian Ministry of Health, they are then distributed to all of the Italian veterinary inspectorate posts.

Therefore, in order for a U.S. company to be authorized to export pet food containing animal by-products, the first step is to contact their local APHIS office in the United States to start the process.

Please note all U.S. manufacturers of pet food products must be on this list prior to shipping their products to Italy. Should a U.S. manufacturer of pet food products attempt to ship their products to Italy without being on the list, under Italian law they are committing an offense, and the product will likely be rejected by border inspection authorities.

Entry to Italy For Trade Show Purposes Only

U.S. manufactured pet food can be exported to Italy for trade show purposes only, but this is possible only on a case-by-case basis and necessitates that FAS/Rome request a specific waiver/derogation for importation of samples to be shipped to Italy for trade show purpose only from the Italian Ministry of Health. This process can be lengthy and therefore U.S. exporters are encouraged to contact FAS/Rome well in advance.

Once the product has been authorized by the Italian Ministry of Health to be exported for trade show purposes only the product cannot be sold on the market and must be destroyed or otherwise disposed of after the show. Italian law is quite strict on the matter, and sets very severe legal sanctions for import and distribution of pet food containing animal products without the required authorization.

EU Pet Food Legislation

In the EU, pet food is regulated by two sets of specific legislation:

1. Production and marketing of feeding stuffs, and
2. Veterinary legislation.

The main legislation that applies to the production and marketing of pet food includes:

- ▶ [Directive 79/373/EEC on the circulation of compound feeding stuffs](#)
- ▶ [Directive 82/471/EEC concerning certain products used in animal nutrition](#)
- ▶ [Decision 2004/217/EC banning certain ingredients for use in compound feeding stuffs](#)
- ▶ [Directive 96/25/EC on the circulation and use of feed materials](#)
- ▶ [Regulation 999/2001/EC laying down rules for the prevention, control and eradication of certain transmissible spongiform encephalopathies \(TSE\)](#)
- ▶ [Directive 2002/32/EC on undesirable substances in animal feed](#)
- ▶ [Regulation 1774/2002/EC laying down health rules concerning animal by-products not intended for human consumption](#)
- ▶ [Regulation 1831/2003/EC concerning additives in animal nutrition](#)
- ▶ [Regulation 183/2005 laying down requirements for feed hygiene](#)
- ▶ [Regulation 1829/2003/EC on genetically modified food and feed](#)
- ▶ [Regulation 1830/2003/EC on the traceability and labeling of food and feed produced from genetically modified organisms](#)

On March 4, 2008, the European Commission presented [a proposal for a new framework regulation on the labeling and marketing of feed and pet food](#). The draft regulation sets out general rules for the labeling of feed and specific labeling requirements for feed materials, compound feed (including pet food) and dietetic feed.

If adopted, one single regulation will replace several directives (79/373/EEC, 80/511/EEC, 82/471/EEC, 93/74/EEC, 93/113/EC and 96/25/EC) and implement feed marketing rules in a more uniform way. At the moment however, this has NOT yet gone into effect.

Certification Requirements

Following the implementation of the EU animal by-products regulation 1774/2002, each individual pet food shipment containing product of animal origin must be accompanied by health certificates signed by APHIS officials.

APHIS veterinary services will endorse certificates after facilities have been officially approved as compliant with Regulation 1774/2002. A [statement guaranteeing that SRM's \(specified risk materials\) have been removed](#) needs to be added to the certificate.

The APHIS website can be viewed at www.aphis.usda.gov

Pet Food Ingredient Requirements

A. Authorized Ingredients and Additives

[European Parliament Council Regulation 1831/2003](#) regulates the use of additives in animal nutrition, outlining rules for the authorization, marketing and labeling of feed additives. Only feed additives with a scientific evaluation authorization by the European Food Safety Authority (EFSA) can be marketed in the EU. [Commission Regulation 429/2008](#) sets out detailed rules regarding feed additives for use in pet food.

B. Prohibited Waste

[Decision 2004/217/EC](#) lists prohibited waste ingredients that are not authorized in feed manufacturing.

C. Animal By-Products

[European Parliament and Council Regulation 1774/2002](#) outlines health rules concerning animal by-products not intended for human consumption. This regulation as well as the TSE regulation were developed in response to the BSE crisis and are part of the EU's strategy to eradicate food-borne crises.

The animal by-products regulation covers all animal products not intended for human consumption, and as such covers both products for technical uses and animal by-products used in the production of feed and pet food.

Animal by-products used in the production of feed and pet food must be derived from carcasses of animals declared fit for human consumption following veterinary inspection (Category 3 products in the regulation). Provisions include a ban on intra-species recycling and fallen stock and restrictions on the use of yellow grease.

Certain categories of pet food have to be denatured with specified substances. Pet food plants must be registered and approved by APHIS and must be dedicated to the production of products fit for human consumption.

Pet food containing animal by-products must be labeled “not fit for human consumption” and raw pet food must be labeled “pet food only.”.

Pet Food Labeling Requirements

Definitions

Directive 79/373/EEC defines pet food as follows:

- ▶ “Complete feed stuff” or “complete pet food”: mixture that is sufficient for a daily ration because of its composition
- ▶ “Complementary feed stuff” or “complementary pet food”: mixture with a high content of certain substances which, because of its composition, is only sufficient for a daily ration if used in combination with other feed stuffs.
- ▶ “Mineral feed stuff”: complementary feed stuff composed mainly of minerals and containing at least 40% crude ash.

Labeling Requirements

General labeling requirements for pet food are established in [Council Directive 79/373/EEC](#). Article 16 of the otherwise repealed [Directive 70/524/EEC](#) lays down labeling requirements for pet food containing additives. (Article 16 will remain in force until the adoption of a new framework regulation on the marketing of feed.)

General labeling rules allow multi-language labels but also require that the label be at least in the language of the country in which the product is sold.

Compulsory Information

Following information is mandatory on the packaging, container or label attached to the product:

- ▶ **Description** of the pet food (complete feed stuff, complementary feed stuff, mineral feed stuff) and the species or category of animal for which the pet food is intended, e.g. “complementary feed stuff for cats”.
- ▶ **Directions for proper use**
- ▶ **List of all feed materials**: Either indicate the amount contained or list the feed materials in descending order by weight. For pet food, the specific name of the category may be replaced by the name of the category to which the feed material belongs to. [Directive 96/25/EC](#) establishes the list of categories.

- **List of additives:** Annex I to [Regulation 1831/2003](#) outlines the additive groups. Article 16 of the otherwise repealed [Directive 70/524/EEC](#) lays down labeling requirements for pet food containing additives. It is mandatory to list antioxidants, colorants and preservatives using respectively the terms “with antioxidant”, “colorant” or “colored with”, “preservative” or “preserved with” followed by the specific name of the additive provided in the [EU Feed Additives Register](#) or, under certain conditions followed by “EC additives”. It is also mandatory to label the presence of vitamins E, A and D and copper and their levels. Other vitamins and trace elements and their levels may be indicated on the label, provided the levels can be determined by valid scientific methods of analysis. In case additives are added to pet food, the manufacturer/dealer has to be registered and the registrations number has to be mentioned on the label. [Council Directive 82/471](#) requires the listing of all bio-proteins, such as yeasts.
- **Claims:** Pet food labels may highlight the presence or low content of one or more ingredients, which are essential for characterizing the pet food. In such a case, the minimum or maximum content, expressed in terms of percentage by weight of the feed material(s) incorporated must be clearly indicated. Labeling may not be misleading, in particular by attributing to the feed stuff effects or properties that it does not possess or by suggesting that it possesses special characteristics when in fact all similar feed stuffs possess such characteristics. Claims that the feed stuff will prevent, treat or cure a disease are prohibited.
- **Declaration of analytical constituents:** A declaration is compulsory in the cases provided for in Part A of the Annex to Directive 79/373/EEC.
- ***The name or business name and address or registered place of business of the person responsible for the information on the label***
- **Container contents:** The net quantity expressed in units of mass (kilos or grams) in the case of solid products, and in units of mass (kilos or grams) or volume (liter or megaliter) in the case of liquid products. Metric units are compulsory.
- **Minimum storage life:** The shelf life is indicated by the words “Use before...” followed by the date (day, month and year) in the case of microbiologically highly perishable pet food or “Best before...” followed by the date (month and year) in the case of other pet food.
- ***The batch reference number***
- ***The approval number allocated to the establishment***

Optional Information

In addition to the compulsory information mentioned above, only the following information may be placed on the packaging, container or label attached to it:

- Identification mark or trade mark of the person responsible for the information on the label
- The name or business name and the address or registered place of business of the manufacturer, if this is not the person responsible for the information on the label

- The country of production or manufacture
- The price of the product
- The description or trade name of the product
- An indication of the processing the pet food has undergone
- In pet foods for which the compulsory analytical constituent declaration does not apply, an analytical declaration of ingredients is optional
- The date of manufacture to be indicated as follows: "manufactured... (days, months or year(s)) before the minimum storage life expiry date indicated"

Pet Food for Particular Nutritional Purposes

[Council Directive 93/74/EEC](#) lays down labeling requirements for pet food for particular nutritional purposes and covers food for cats and dogs with insufficient renal or liver functions. [Commission Directive 2008/38/EC](#) establishes a positive list of intended uses of animal feed stuffs for particular nutritional purposes. Pet foods for particular nutritional uses may be marketed only if their intended use is listed in Part B of Annex I to Directive 2008/3/EC.

Genetically Modified Feed

Regulation 1829/2003 and Regulation 1830/2003 on genetically modified food and feed outline labeling requirements for GM feed and establish the approval procedure for GMOs in feed.

Hygiene and Traceability

Traceability for all food and feeds produced and imported in the EU became mandatory on January 1, 2005 ([Regulation 178/2002](#)). New rules on Feed Hygiene ([Regulation 183/2005](#)) entered into force on January 1, 2006, and also cover vegetable origin feed

For operators in the EU, this legislation introduces compulsory registration. Operators in the EU dealing with more sensitive substances such as certain additives need to be approved. EU Member States must keep updated lists of such establishments. The Commission compiles the Member States' lists and makes them available to the public. For that purpose, the Commission has created a single, central and easy access to the different [lists of feed establishments](#) published by each Member State.

Additional Information

For additional EU pet food information please refer to the U.S. Mission to the EU website: <http://useu.usmission.gov/agri/petfood.html>

For additional Italy pet food information please contact the USDA-FAS Rome, Italy office:

Tel: (011) (39) 06 4674 2396
Fax: (011) (39) 06 4788 7008
Website: <http://rome.usembassy.gov/agtrade/default.asp>

E-mail: agrome@fas.usda.gov