



Import Policy for Pet Food and Treats Containing Animal Products and By-Products

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Amendments: This policy has been extensively revised and completely replaces any other versions.

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I. Legal and Regulatory Framework

This policy falls under the legislative authority of the [Health of Animals Act](#) and [Health of Animals Regulations](#), including the [Reportable Diseases Regulations](#), which outline the animal diseases of concern to Canada that can be transmitted in animal products and by-products, and things containing animal products and by-products (APABP).

Part I.1: 6.5 (1), Part II: 7.(1), Part IV: 40, 41.(1), 50, and 52.(1) of the [Health of Animals Regulations](#) are particularly relevant with respect to the import of APABP, and things containing APABP, such as food for pet animals.

The CFIA does not regulate pet food production in Canada for domestic sale, however, the importation of pet foods and related products containing ingredients of animal origin are subject to the relevant sections of the [Health of Animals Act and Regulations](#) in order to prevent animal diseases from being introduced to Canada.

This set of Act and Regulations defines Canada's authority for recognizing countries as free of specified diseases for the purposes of import into Canada, and includes provisions for the issuance of import permits, the prohibition of feeding certain bovine tissues (Specified Risk Materials, or SRM) capable of transmitting Bovine Spongiform Encephalopathy (BSE) to any animal in Canada, and the conditions under which travellers entering Canada from the USA may bring pet food for their pets accompanying them.

Subsections 6.5(1) and (2) of the [Health of Animals Regulations](#) apply to persons entering Canada from the USA, and specify that travellers may enter Canada from the US with food for their pets, if:

- a) the country of origin of that product is the U.S.;
- b) the person on entry into Canada from the U.S., was in possession of the product and was accompanied by the animal to which it is fed;
- c) the person legally imported both the product and the animal into Canada; and
- d) the product is fed only to the animal that accompanied the person into Canada.

The [Health of Animals Act and Regulations](#) have provisions for the protection of human health related to diseases and toxic substances that may be transmitted by animals to persons. In addition, the CFIA cooperates with the Public Health Agency of Canada in order to take any necessary mitigating measures regarding concerns to public health associated with processed and unprocessed pet food imported into Canada. Please find here a [List of Acts and Regulations - Acts and Regulations - Public Health Agency of Canada](#).

Where human health risks have been identified in processed and unprocessed pet food (single-ingredient pet chews and raw pet food diets), the CFIA applies import requirements for laboratory testing (ie: for Salmonella and enterobacteriaceae).

More information on the human health risks associated with raw animal products and by-products can be found on the [Health Canada](#), [Public Health Agency of Canada](#) and the [Canadian Veterinary Medical Association](#) websites.

Importation of products with therapeutic claims intended for use in animals, such as veterinary drugs, is regulated by [Health Canada's Health Product and Food Branch Inspectorate](#). Please refer to the Guidance Document on the Import Requirements for Health Products under the *Food and Drugs Act* and its *Regulations* (GUI-0084). http://www.hc-sc.gc.ca/dhp-mps/alt_formats/pdf/compli-conform/import-export/gui_0084-eng.pdf

Health Canada does not test, approve or regulate foods sold for companion animals in Canada, however, the Veterinary Drugs Directorate is responsible for authorising therapeutic claims that could be made on pet food.

Health Canada also has an Interim Notification Pilot Program for Low-Risk Veterinary Health Products (LRVHPs), such as certain botanicals, vitamins, minerals and homeopathics for use in cats, dogs, and horses that are not intended for food. Health Canada would not normally seek to prevent the importation, manufacture or sale of products duly notified through the program unless a health risk is identified. <http://www.hc-sc.gc.ca/dhp-mps/vet/issues-enjeux/notification-declaration-eng.php> and <https://www.lrvhp.ca/>.

II. Definitions

Animal product: means an animal product that originated from a bird or from any mammal except a member of the orders Rodentia, Cetacea, Pinnipedia and Sirenia; includes cream, eggs, milk, non-fertilized ova and semen.

Animal by-product: means an animal by-product that originated from a bird or from any mammal except a member of the orders Rodentia, Cetacea, Pinnipedia and Sirenia; includes blood or any of its components, bones, bristles, feathers, flesh, hair, hides, hooves, horns, offal, skins and wool, and any thing containing any of those things; (ie: meat, offal, meals (rendered or process animal proteins, etc.)

Aquatic animals: the definition of “animals” in the Health of Animals Act includes in this nomenclature fish, molluscs (clams, oysters, scallops, squid, etc.) and crustaceans (shrimp, krill, lobster, crab, etc.)

Bovine animal: means cattle or bison domestically raised or kept; includes cattle, buffalo, bison, and exotics. Taxonomically, they are classified as members of the subfamily bovinæ from the genus *Bos*, which includes cattle (*Bos taurus* and *Bos indicus*) and bison (*Bos bison*).

CFIA import permit: a document issued by the Minister under section 160 of the *Health of Animals Regulations* for the purpose of importing animals or things.

Compound chews: pet chews made from rawhide and additional ingredients, such as meat, rendered animal meals, cheese, ground rawhide, peanut butter, corn syrup, flours, etc. In some cases, the exterior "casing" consists of rawhide wrapped around a meat such as chicken tenders or duck breast.

Country of Origin: with respect to an animal product or animal by-product that has undergone processing that would prevent the introduction of any reportable disease, any disease referred to in Schedule VII and any serious epizootic disease to which the species from which the product or by-product was derived is susceptible and that can be transmitted by the product or by-product, the country in which the product or by-product underwent that processing.

Designated country or zone: a country or zone determined by the CFIA to be free of reportable and immediately notifiable diseases that either affect or are transmitted by the species of origin of the animal, animal product, or by-product to be imported into Canada. The CFIA utilizes risk assessment methodology in order to determine if a hazard is present in a country, and to evaluate the risk of transmission of that hazard resulting from the importation of animals, animal products, or by-products. Refer to the list of Reportable Diseases Immediately Notifiable and Annually Notifiable Diseases.

Livestock: means animals of the bovine, caprine, equine, ovine and porcine species

Non-ruminant: animals others than those of the family of Ruminantia (see the definition below).

Pet: a domesticated animal, not including livestock or poultry, usually kept in a residence as a companion and generally referring to dogs and cats; can also be referred to as a companion animal.

Pet chews: products obtained from untanned hides and skins of ungulates or other animal tissues for pet animals to chew. They have no nutritional value and may contain flavourings, colorants, and preservatives. They may be prepared from various animal parts, such as rawhide, bones, tendons, ligaments, trachea (cartilage), shanks, feet, hooves, horns, ears, snouts, offal, tails, penises (pizzles), and skins. This policy deals with only compound pet chews made of rawhide plus other animal products and by-products that are heat treated. Other types of chews include: single ingredient rawhide chews (rawhide only, with no other ingredients) and chews made from other animal tissues.

Pet supplement: a highly processed nutritional product whose purpose is to provide additional protein, vitamins, minerals, or other products, to pet animals. Supplements may be in pill, capsule, powder, or liquid form, and may either be added to food or given directly (orally) to the animal. These commodities generally fall under the Highly Processed Products Import Directive and may have import requirements of any animal origin ingredients contained within. Where health claims exist on pet supplements, Health Canada may have requirements.

Pet treat: a pet food, with limited nutritional value, either baked, extruded, or injection-moulded. It is usually made with flour, starch, fibres from fruit or cereal product, mixed with greaves, meat, or meat meal. The treat may be semi-moist or dried and is used as a supplement to a regular diet, reward, and/or training aid.

Processed pet food: pet food that has been **heat-treated**; repackaging or packaging from bulk does not constitute processing; raw pet food is not considered to be processed. Processed pet foods containing animal products and by-products are subject to the applicable provisions in the Health of Animals Act and Regulations and may be dry, semi-moist, or moist, and have been extruded, baked, canned or retorted, and are shelf-stable, with no refrigeration required after processing.

Raw food diet: a commercial, ready for retail sale diet which has not undergone any heat treatment, requiring refrigeration; the product may be chilled, frozen or quick/flash frozen. Also known as Biologically Appropriate Raw Diet (BARF) diet; a typical BARF diet is made up of 60-80 percent of raw meaty bones (RMB); that is, bones with about 50 percent meat (e.g. chicken neck, back and wings) and 20-40 percent of fruits and vegetables, other offal, meat, eggs, or dairy foods.

Rawhide: a material obtained by separating an animal hide over its whole area into two or more layers (splitting the hide). The bottom split is then processed by a means similar to parchment dressing, in which the hide is converted to a form of hardened and dried product without the process of tanning. It has no nutritional value and may contain flavourings and colorants.

Ruminant: animals of the suborder Ruminantia, which regroups the following species: bovine (cattle, bison, and buffalo); ovine (sheep); caprine (goat); and cervid (deer, elk); and other exotics (kudu, élan).

Specified risk material (SRM): means the skull, brain, trigeminal ganglia, eyes, tonsils, spinal cord and dorsal root ganglia of cattle aged 30 months or older, and the distal ileum of cattle of all ages, but does not include material from a country of origin, or a part of a country of origin, that is designated as posing a negligible risk for Bovine Spongiform Encephalopathy.

Transit: a movement of cargo from the country of origin of the goods to the country of final destination via an intermediate or third country, where the shipment is transferred from one means of container enclosing the goods is not opened, and the original seal remains intact and corresponds to the seal number listed on the zoosanitary export certificate accompanying the shipment issued by the Competent Authority of the exporting country.

Transshipment: a movement of cargo from the country of origin to a country of destination where the container enclosing the goods passes through an intermediate or third country, it is customs cleared, the original seal is broken and the container is opened, the contents are removed and a portion of the original cargo is then shipped from the intermediate or third country's warehouse to the final destination in the importing country.

Zoosanitary export certificate: a certificate issued and endorsed by a veterinarian of a central (national) competent animal health authority, certifying to the importing country's animal

health import requirements; these are internationally recognized documents that include attestations by the competent veterinary authority in the country of export to ensure that imported products meet the importing country's requirements; also referred to as a Zoosanitary Health Certificate.

III. Foundations of CFIA Import Policy for Animal Products and By-Products and things containing Animal Products and By-Products

Within the above noted legislative framework, the CFIA uses risk-based methodology in the development of specific import conditions.

For pet food containing APABP, the risks depend upon numerous factors, including: the animal origin products and by-products contained within the product(s), their respective animal species of origin, their country of origin and corresponding animal health status recognition by the CFIA, and the capability of the untreated animal product or by-product to transmit any animal disease(s) of concern.

The list of countries that CFIA has evaluated with respect to animal diseases that can be transmitted by APABP can be found listed by country or disease on the [CFIA Disease Freedom tables](#), published online. In cases where the CFIA has not recognized an exporting country/region/state or zone as free of a disease that can be transmitted in the commodity for import into Canada, the CFIA requires the use of an Import Permit. The CFIA may also require import permits in other circumstances, as per the Section 160 of the *Health of Animals Regulations*.

Canada accepts the OIE country classification system for Bovine Spongiform Encephalopathy (BSE) Risk Status, and import requirements related to ruminant animals and their products can found within the [CFIA Import Policy for Bovine Animals and their Products and By-Products](#).

Zoosanitary export certificates facilitate trade in animal products and by-products, including pet food that contains animal products and by-products. They are issued and endorsed by the competent veterinary authority of the exporting country in order to comply with a trading partner's import standards and regulations. Canada's acceptance of zoosanitary export certification attesting to CFIA's import requirements for processed pet food is based upon the CFIA's evaluation of that country's certifying body and/or veterinary infrastructure.

For the purposes of export of pet food to Canada, country eligibility is based upon CFIA evaluation of the above criteria, specifically: the animal health status of the country of origin of the processed pet food, and the ingredients contained within, as well as acceptance of zoosanitary export certification from the country of export.

Importation from countries that have not been evaluated at either of these levels must be assessed on a case-by-case basis at CFIA National Headquarters, and may require individual facility approval, with all relevant fees and associated expenses paid for by the importer(s) requesting the approval.

IV. Background of Processed Pet Food Import Policy

Food for animals other than livestock and poultry, including pets, laboratory and zoo animals, may be manufactured from a wide variety of APABP capable of transmitting diseases posing a risk to animal or human health.

Animal-origin products and by-products used in pet foods, include (but are not limited to): edible and inedible meat and offal, processed animal proteins (ie: rendered meals and digests), egg and dairy products, tallow/rendered animal fats, and various other animal products and by-products.

The CFIA has evaluated heat-treatment as a reliable processing method for the mitigation of animal health risks. In order for the CFIA to consider the use of processes other than heat-treatment, a request must be made to CFIA Programs and Policy Branch to evaluate such processes. In some cases, a formal Risk Assessment request will be required, as per the CFIA policy for [Development of New Import Protocols—Procedures for Clients](#).

This policy addresses the CFIA import policy related to heat-treated, shelf-stable, pet foods (not requiring refrigeration) including: dry and semi-moist food and treats that have been heat-treated (ie: extruded or baked), and commercially sterile moist food in cans or hermetically sealed containers, as well as pet food diets containing raw (not heat treated APABP that require refrigeration).

Import conditions for individual animal products and by-products, as single ingredients for the manufacture of pet food in Canada, are not addressed in this policy. Import conditions for commodities that fall outside of this directive can be found within the commodity-specific import directives listed in Section IV of this policy, on the [CFIA Import Policies](#) webpage for animal products and by-products, or by using the [Automated Import Reference System \(AIRS\)](#).

This policy relates to the programs and import requirements of the CFIA Animal Health Directorate and does not remove any obligation of the Canadian importer to comply with the import requirements of other CFIA Divisions, such as Feed, Plant Health, or Food (which includes the former Meat Programs Division) and/or any other federal, provincial/territorial, or municipal government requirements.

This policy does not cover:

- a) Pet food imported as Samples for laboratory testing, diet trials, or for exhibition purposes.
- b) Pet food imported for feeding to animals for laboratory research/ in research laboratories
- c) Highly Processed Products
- d) Veterinary Drugs or products with therapeutic claims intended for pets
- e) Single ingredient pet chews made only from rawhide or other animal tissues

V. Other Relevant CFIA Policies

[Bovine Spongiform Encephalopathy Import Policy for Bovine Animals and their Products and By-Products](#)

[Animal Health Import Requirements for Rendered and Inedible Products](#) (ie: for imports of rendered and inedible ingredients for the manufacture of pet food in Canada)

[Development of New Import Protocols—Procedures for Clients](#) (ie: For imports of new commodities or from new exporting countries)

[Highly Processed Products Import Policy](#) and [Animal Products/By-Products to be used as Medicinal or Natural Health Products](#) (ie: for Vitamins, Minerals or Supplements and Nutraceuticals)

[Returns and Permit Application Process for Canadian Animals, Semen, Embryos, Animal Products and By-Products and Finished Pet food](#) (ie: for returns of processed pet food legally exported from Canada)

VI. General Import Requirements for Processed (heat-treated, shelf stable and ready to eat) Pet Food and Treats

1. Originating from countries recognized by the CFIA as free of reportable diseases that may be transmitted in the untreated animal product or by-product(s) used in the processed pet food (ie: USA, Australia, New Zealand)
 - Zoosanitary Export Certification, attesting to CFIA import requirements
2. Originating from countries NOT recognized by the CFIA as free of reportable diseases that may be transmitted in the untreated animal product or by-product(s) used in the processed pet food, but which the CFIA has significant knowledge of that country's inspection infrastructure (ie: EU, Brazil, Uruguay, Argentina)
 - Import Permit
 - Zoosanitary Export Certification, attesting to CFIA import requirements
3. Originating from countries NOT recognized by the CFIA as free of reportable diseases that may be transmitted in the untreated animal product or by-product(s) used in the processed pet food, and which the CFIA have some knowledge of that country's inspection infrastructure: (ie: China, Thailand)
 - Facility Approval (facility appears on the approved list)
 - Import Permit
 - Zoosanitary Export Certification, attesting to CFIA import requirements

4. Originating from countries NOT recognized by the CFIA as free of reportable diseases that may be transmitted in the untreated animal product or by-product(s) used in the processed pet food, and which the CFIA have NO knowledge of that country's inspection infrastructure:
 - Case-by-Case Evaluation by CFIA National Headquarters

VII. General import requirements for Pet Food Diets containing raw animal products and by-products

Imports of pet food diets containing raw (not heat-treated) animal products and by-products are eligible only from those countries that are recognized as free from diseases that may be transmitted in the unprocessed animal products and by-products. (Category 1 countries, as defined in Section VI, above)

- Import Permit
- Zoosanitary Export Certification, attesting to CFIA import requirements

A case-by-case evaluation by CFIA AIED NHQ is required for imports of raw diets from other countries.

VIII. Pet food Accompanying Travellers from the USA

In addition to the requirements stipulated in the *Health of Animals Regulations*, pet food imported with travellers entering Canada from the USA with their pets, must be processed pet food, originating from the USA, and in final packaging. It may be either wet or dry, in its original unopened bag or can. The label must clearly indicate the list of ingredients. A maximum of 20 kg per entry is allowed. Personal imports of pet food from countries other than the USA is prohibited.

IX. Transshipments, Transiting Shipments and Exports from Third Countries

In cases where shipments of pet food for import into Canada have been *transhipped*, have *transited through* or have been *legally imported into third countries*, prior to entering Canada, all import conditions apply as if the products were being imported directly from the country of origin. **Such shipments must be approved by CFIA NHQ prior to import.**

Additional certification from the transiting or transshipping countries' competent authority(ies) may be required, to ensure the integrity and zoosanitary status of shipments for import into Canada.

1. Transit

- a) Any shipments of pet food transiting through Canada for import into third countries, must meet all of CFIA's import requirements.
- b) Transit of goods from a foreign country via an intermediate country to Canada must be requested by the importer and must be pre-authorized by the CFIA.

The zoosanitary export certificate issued by the official authority of the country of origin must state that Canada is the final destination of the product, specify the border entry point in the transiting country, the border exit point in the transiting country, the description of the product, and the container seal number as well as other certification statements as required by the import permit conditions.

Note: It is the responsibility of the importer to ensure that the product (pet food) is in compliance with all applicable transiting country government regulations.

Transiting shipments must be accompanied by official documentation from the transiting nations' competent authority indicating the seal numbers and that all seals were verified to be intact upon entry and exit from that country, and that the goods were maintained under official supervision during transit.

2. Transshipment

Transshipment of goods from a foreign country via an intermediate country prior to entering Canada must be requested by the Canadian importer and must be pre-authorized by the CFIA. Transshipment is permitted through: the United States, the European Union, Australia and New Zealand.

The importer must provide the proposed transshipment details (name of transshipping country and port of entry, warehousing, conditions of warehousing, any re-sealing, other ingredients on the premises of the transshipment location, etc.), and must declare on their permit application the origin of the pet food to be transhipped.

The shipment must be accompanied by zoosanitary export certification from the country of origin attesting to Canada's import requirements.

The zoosanitary export certificate must clearly show the original seal number(s) of the container(s), the full description of the pet food seeking to enter Canada, and its specific identification references/method(s), either lot or batch number, etc. and the final destination of that part of the shipment that is destined for Canada.

Upon transshipment in the third country, additional zoosanitary export certification is required (referencing and attached to the original zoosanitary export certificate) from the animal health competent authority of the transshipping country certifying that:

- the pet food products were legally imported into the transshipping country, referencing the name and number of the zoosanitary certificate from the country of origin; and
- the original seal number(s) and the replacement seal numbers are provided on the certificate; and

- the products for export to Canada were always maintained under official control and were not cross-contaminated with any animal product or by-product of lesser zoosanitary status while in the transshipping country

Once the product is loaded on the means of conveyance to Canada at the transshipment point, no further transshipment is permitted. The product must move directly to the destination in Canada.