



GUIDANCE ON TRADING OF PET FOOD SAMPLES

2024



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1 - INTRODUCTION

The Global Alliance of Pet Food Associations (GAPFA) is a non-profit association, established in Belgium in 2014, representing the following national and regional pet food industry associations and companies of pet food manufacturers across the globe:

- **ABINPET** - Brazilian Pet Products Manufacturers Association (Brazil)
- **AMASCOTA** - Consejo Nacional de Fabricantes de Alimentos Balanceados (Mexico)
- **CAENA** - Camara Argentina de Empresas de Nutricion Animal (Argentina)
- **CFIA** - China Feed Industry Association (China)
- **FEDIAF** - European Pet Food Industry Association (Europe)
- **JPFA** - Japan Pet Food Association (Japan)
- **KPFA** - Korea Pet Food Association (South Korea)
- **NZPFMA** - New Zealand Pet Food Manufacturers Association (New Zealand)
- **PFAC** - Pet Food Association of Canada (Canada)
- **PFI** - Pet Food Institute (The United States of America)
- **PFI-SA** - Pet Food Industry Association of Southern Africa (South Africa)
- **PFIAA** - Pet Food Industry Association of Australia (Australia)
- **PIA** - Petfood Industry Association (Thailand)
- **Blue Buffalo**
- **Hill's Pet Nutrition**
- **Mars Petcare**
- **Nestlé Purina PetCare**
- **Freshpet**

GAPFA's vision is to improve the health and wellbeing of pets globally through access to safe, nutritious and sustainable pet food. GAPFA provides a forum for discussion on key issues considering responsible pet ownership, access to safe nutritious food. GAPFA aims to harness the collective experience of the global pet food industry and key external stakeholders to promote science-based guidelines to promote commercial pet food as a safe commodity by respecting sanitary safety and thereby safeguarding world trade of pet food products and pet food samples.

To uphold this objective, GAPFA supports the application of appropriate principles requirements for use by the pet food industry to aid in the protection of importing countries from the introduction of foreign diseases and pathogens, without imposing unnecessary sanitary and trade barriers. This document has been developed to provide guidance to navigate the different approaches to importing sample management, it does not consider every individual scenario and should not replace independent professional or local regulatory advice. It is not intended to be a step-by-step complete education process or to be adopted as formal regulation. It may be used when considering how to establish an appropriate samples importing framework or to consider challenging a current framework that is not fit for purpose.

2 - OVERVIEW

Samples are often required ahead of other commercial arrangements for a variety of reasons. Raw materials may need to be sampled to ensure they meet the required nutritional, physical and sensory attributes or for the purposes of registration and market approval. Likewise, samples of finished product may be required for similar purposes or for other types of research. As these arrangements normally occur outside normal commercial trade, certain considerations may not be known at the time of import, such as processing information. As such, samples normally require a different set of requirements to commercial trade and the process for authority approval differs by jurisdiction.

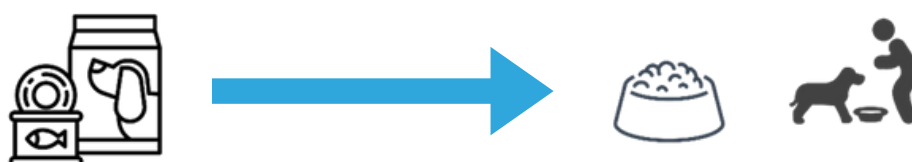
GAPFA's Food Safety and Trade Facilitation Workstream has created a subgroup which has identified the main requirements for the importation of pet food samples from a select range of countries, which considers some of the diverse approaches.

Each country approaches the subject of sample importation differently but overall, the following models can be considered:

MODEL 1

Sample direct delivery

In this model, samples may be sent to the receiver with little to no additional restrictions or documentation, samples simply are sent and are able to cross the border and be used as the receiver wishes.



MODEL 2

Sample sent with government endorsements required

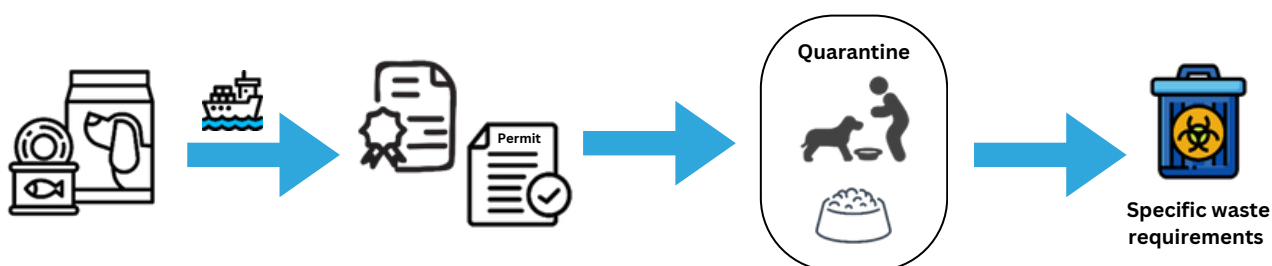
In this model, the exporting government is required to endorse or otherwise certify the safety of the goods being sent. This means a government issued health certificate in addition to other consignment documents are required prior to sending. Goods, once arrived and cleared at the border, are able to be used at the receivers discretion.



MODEL 3

Apply for approval to ship samples, sample sent with government certification and onshore restrictions

In this model, governments may wish to consider the potential risks associated with the sample product and the effect inappropriate use might have on the environment and public health. They may look at import permits prior to sample shipping and exporting country competent authority certificate (sanitary certification/health certification/veterinary certification) in addition to the usual consignment documentation. A condition in this case also would be quarantining of the sample on arrival with strict control on where the sample may be used. There may also be restrictions on how the sample may be disposed.



3 - SCOPE AND INTENDED PURPOSE

Trade samples are small volumes of a product that may be a raw material intended for pet food manufacturing or a finished pet food product or intended for particular studies or analyses. These products may contain animal and non-animal components depending on their nature. Samples may be required for the purposes of (but not limited to) country registrations/approvals, fit for purpose testing (analytical testing) prior to purchase commitment, or other research purposes.

When considering whether to import samples, the following questions may be helpful:

- What are the import requirements for the destination country?
- What are the export requirements for the country of export?
- What is the Harmonized Tariff number for the samples?
- What is the intent of use?
 - Human evaluation
 - Sample for consumers research focus group: sensory and cosmetics.
 - Sample for customers evaluation.
 - Analysis
 - Samples for laboratory analysis: chemical; microbiological.
 - Sample for equipment calibration.
 - Research when pets are fed.
 - Sample for in-house testing: palatability, digestibility, urinary pH
 - Sample for external testing: clinical and efficacy trials.
- What is the value of the sample? Most markets require a value assigned to such a consignment, for some a nominal value is allowed but for others if the sample not in the market, the product must be valued the same as a “like” product.
- What is the competent authority of the exporting facility to certify the sample shipments and is the competent authority willing and aligned to sign the export documents?

Generally speaking, the importation of pet food into a country, consideration is given to three areas:



Figure 1: Three consideration areas for importation.

4 - PRODUCTION STANDARDS

Where required, trade samples may need to be produced and stored in accordance with Good Manufacturing Practices (GMP) / Good Hygiene Practices (GHP) guidelines to ensure the safety of the product.

Depending on the import requirements some countries may need a manufacturing declaration, stating the products are cooked, frozen or preserved in such a way that they will not spoil between the time of dispatch and the time of delivery to the plant of destination and may include other processing parameters.

5 - HEALTH CERTIFICATION / DOCUMENTATION

Imports of trade samples may need to be accompanied by an appropriate health certificate depending on the importing country's requirements (see Annex I for an example) and whether agreement exists between importing and exporting countries.

Note: Some countries require the consignment to be labelled 'TRADE SAMPLE NOT FOR HUMAN CONSUMPTION' and / or 'NOT FOR COMMERCIAL USE'.

NB: out of scope of this guidance is the bulk of transport documentation needed to trade.

6 - AUTHORIZATION / IMPORT PERMIT

Depending on the importing country's requirements for the specific sample's intent there can be the need for an importation authorization which is to be obtained from the importing competent authorities. Please see Annex II for an example of an import permit application form. Consignments which have not been authorized prior to import might not be permitted into the country and might have to be destroyed or re-exported.

7 - APPROVAL OR REGISTRATION OF DESTINATION PREMISES

As samples may be imported outside the normal import consideration or assessment processes or if the local regulations require it, some authorities require some measure of onshore control. This may be some way to trace the importation of goods that are not covered by a commercial permit or that may represent some risk if further distributed beyond the initial importation intention. Depending on the importing country's requirements and / or the intent of use of the sample the need to register as importer could arise. Approval should be sought from the competent authorities before commencing operations.

Products that may present a risk to the importing country may need to be imported under controlled conditions, samples often fall into this category.

In order to import trade samples or display items, there may be a need to register with the relevant local authority, any operator, establishment or plant that:

- Generates, manufactures or otherwise processes
- transports, handles,
- stores, distributes
- otherwise uses, or
- disposes of animal by-products including research and diagnostic samples,

8 - MOVEMENT FROM THE BORDER CONTROL POST (BCP) TO THE PREMISES OF DESTINATION

At the border the goods are checked against the import documentation. Following these checks the products are normally transported directly from the BCP to the specific destination as per customs directives.

9 - DISPOSAL OR RE-EXPORT OF TRADE SAMPLES

Depending on the reasons for sending samples, they may be kept for reference purposes, transferred or re-dispatched to the country of origin or disposed of in accordance with the relevant applicable animal by-product/biosecurity regulation in the respective importing countries.

Transfer of the imported material from the authorized user to any other user may also require some authorization by the competent authorities which may be that they need to be included on any import permit or separately advised through another authority application.

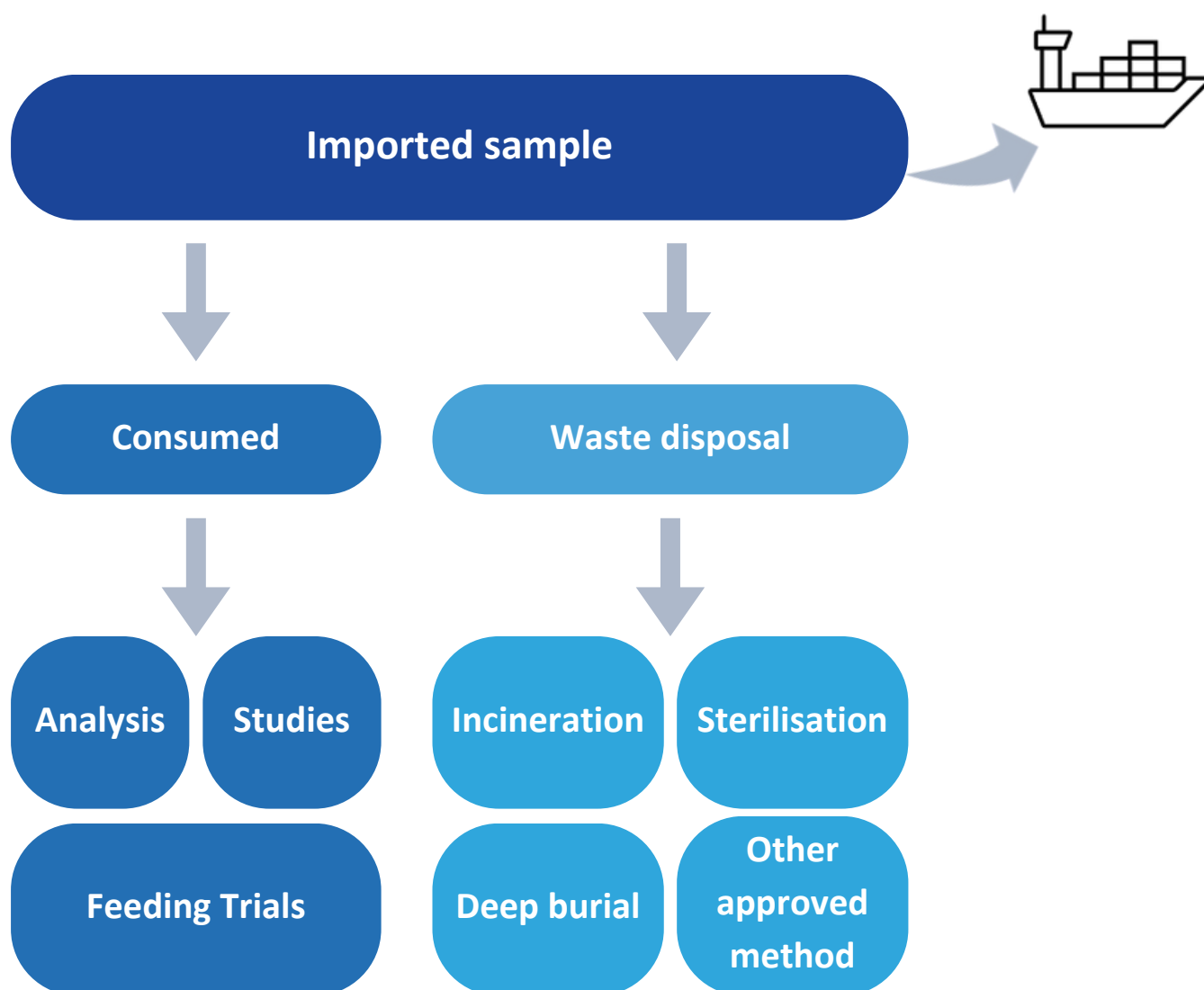


Figure 2: Examples of use/disposal.

ANNEX I

VETERINARY HEALTH CERTIFICATE FOR THE TRADE of PETFOOD SAMPLES AND / OR ANIMAL BY-PRODUCTS TO BE USED FOR PURPOSES OTHER THAN RETAIL SALE

Details of dispatched consignment	Consignor	Name	Certificate reference number		
		Address	Central Competent authority		
		Country	Local Competent authority		
		Phone			
	Consignee	Name	Person responsible for the consignment in the country of destination		
		Address			
		Country			
		Phone			
	Country of origin, ISO code		Country of destination, ISO Code		
	Place of origin	Name	Place of destination		
		Address			
	Approval number				
Place of loading		Date of departure			

Means of transport	Aeroplane	Ship	Railway wagon	Road vehicle	Other
	Identification				
	Document				
Entry BIP	Name:		BIP unit no:		
Temperature of products	Ambient		Chilled		Frozen
Quantity					
Total number of packages					
Seal / container No					
Commodity certified for					
Identification of the commodity					

Attestation

I, the undersigned official veterinarian, declare that the derived product from animal by-products / animal by-products described above are trade samples, which consist of animal by-products intended for particular studies or analyses that bear the label 'TRADE SAMPLE NOT FOR HUMAN CONSUMPTION and / or NOT FOR COMMERCIAL USE'.

The animal by-products that have been used for the production of derived products described above have been

- obtained from animals that come from areas that are not subjected to restrictions due to quarantinable diseases or obligatory reportable diseases.
- obtained from healthy animals inspected before and after slaughter, and their slaughter has been performed at officially authorized slaughter facilities.

Certified products

- come from facilities authorized by the competent Veterinary Authorities, and their equipment undergoes cleaning and disinfection processes to guarantee the absence of raw material residues of other origin.
- Have been packed in new packaging which prevents any leakage or in packaging which has been cleaned and disinfected before use and, in the case of consignments shipped other than via parcel post, in containers sealed under the responsibility of the competent authority, bearing the label indicating
 - 'DERIVED PRODUCTS FROM ANIMAL BY-PRODUCTS FOR USES OUTSIDE THE FEED CHAIN'
 - or
 - 'ANIMAL BY-PRODUCTS ONLY FOR THE MANUFACTURE OF DERIVED PRODUCTS FOR USES OUTSIDE THE FEED CHAIN'
 - and the name and address of the establishment of destination
- Have been deep-frozen at the plant of origin or have been preserved in such a way that they will not spoil between the time of dispatch and the time of delivery to the plant of destination

Handling, loading and transportation conditions observe international health standards in order to prevent product contact with potential contamination sources.

Prepared in

on :

Stamp

.....
Signature of the Official Veterinarian

.....
Name in capital letters, qualifications and title

ANNEX II

APPLICATION TO IMPORT TRADE SAMPLES NOT FOR HUMAN CONSUMPTION			
APPLICANT DETAILS			
Name of Application			
Phone Number		Mobile Number	
Email Address			
Registered Company Name			
Registered Company Address			
ESTABLISHMENT DETAILS			
Animal By-Product Establishment Registration Number			
Establishment Name/Plant Name <i>(if different from above)</i>			
Establishment/Plant Address <i>(if different from above)</i>			
PRODUCT DETAILS			
Product/Material to be imported			
Product Trade Name <i>(if any)</i>			
Animal species of origin			
ABP Category of Material			

APPLICATION TO IMPORT TRADE SAMPLES NOT FOR HUMAN CONSUMPTION	
Quantity to be imported	
Status (e.g; fresh, chilled, frozen, cooked, smoked or other treatment):	
Nature of packaging	
Means of destruction of product	
Country from which Trade Sample item is being despatched	
Name and address of Premises of Export	
Expected date of arrival of product(s) to importing country	
Point of first entry into importing country. Please specify which BCP	
Please confirm a Health Certificate will accompany the Trade Sample product (indicate Yes/No)	
ADDITIONAL NOTES	

DECLARATION BY APPLICANT

I, the undersigned, declare that the information provided here is correct to my knowledge and that if a licence is granted:

1. All materials imported using the licence will be used as Trade Samples only.
2. The materials will only be used as a trade sample and is not for resale.
3. The materials will not be used for human consumption.
4. The materials are not to be fed to livestock
5. I will notify Animal Product Imports of any changes to the above information.
6. I further undertake to comply with the conditions of any licence issued to me.

Signature of Applicant	
Date	
Position Held	

Global Alliance of Pet Food Associations (GAPFA)

13A Avenue de Tervueren | 1040 Brussels (Belgium) | secretariat@gapfa.org

