

REGULATION
DEPARTMENT

30 OCT 2015

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Department of
**Agriculture,
Food and the Marine**
An Roinn
**Talmhaíochta,
Bia agus Mara**

Mr. Pat Herbert,
Head of Regulation,
Bord na gCon,
Greenpark,
Limerick.

27th October, 2015

Dear Pat,

**Re: New policy on the feeding of Animal By-Products (ABP) to
dogs including greyhounds**

I refer to our recent meeting regarding the new policy and procedures relating to Article 18(1)(f) of Regulation (EC) 1069 of 2009, which allows specified Category 2 and Category 3 animal by-product (ABP) to be fed to “dogs from recognised kennels and packs of hounds” and which was introduced on 1 May, 2015 with the agreement of all stakeholders.

The key elements of this policy are that:

- i. Production and sale of Category 2 (and 3) ABP is restricted to Collection Centres, approved and supervised by the Department. Collection Centres are fixed premises (which may be located near to greyhound tracks), facilitating effective supervision, including the effective and reliable identification and denaturation of ABP;
- ii. Purchase and use of Category 2 (and 3) ABP for greyhounds is restricted to Licensed Meat Feeders, authorised by the Department following a recommendation by either one of the greyhound bodies - Bord na gCon and/or the Irish Coursing Club (ICC) - on foot of the issue of a Recognised Kennel Authorisation (RKA).

The conditions of approval to sell meat ABP state that operators of authorised collection centres supplying relevant material other than fish offal to final users must ensure that the material being sold/supplied should be denatured by staining or other means, in accordance with the Regulations and Departmental guidelines. In addition, regarding the sale of the prepared meat ABP, the conditions of approval state that all feed for hounds or other derogated species must be labelled appropriately and supplied only to authorised end-users and that the operator must verify authorisations in each instance.

A review process was built into this policy and as part of that review a number of significant issues relating to the sale of the meat ABP have been identified, as set out below, that need to be addressed.

Under the EU and national ABP Regulations, any person handling, possessing, transporting, using or disposing of ABP must be authorised, approved or registered by this Department. The sale of meat ABP can only take place from a premises approved by this Department. The premises must be a fixed premises and can for example, be attached to a knackery, a slaughterhouse or can be an independent building on a site in or close to a racetrack. **The sale of meat ABP from mobile units such as vans/trucks /lorries within or in the immediate vicinity of racetrack or stadium or at any other non-authorised venue is prohibited.** The Department is reviewing the possibility of permitting direct delivery, by approved Collection Centres to Licensed Meat Feeders, on a pre-order basis and subject to compliance with strict conditions including use of refrigerated transport.

Where an operator has access to a premises within or close to a stadium and is considering using that

premises as a sales point, the operator should contact this Department to discuss authorisation for that activity.

The purpose of the new policy is, while allowing properly regulated economic activity to proceed, to mitigate the potential risk to both animal and public health particularly from category 2 material which is derived from fallen animals. **It is a serious breach of the Regulations and conditions of approval to sell incorrectly stained meat or to sell meat ABP to non-authorized persons or from non-authorized locations.**

The penalties for breach of the Regulations are set out in Regulation 3(2) of SI 187/2014 in the European Union (Animal By-products) Regulations 2014 which provides that a person who contravenes the ABP Regulations commits an offence and is liable, on summary conviction, to a class A fine or imprisonment for a term not exceeding 3 months or to both or, on conviction on indictment, to a fine not exceeding €250,000, or imprisonment for a term not exceeding 12 months, or to both.

The Department is determined that where the practice of illegal selling of meat ABP and/or inadequate staining of meat ABP is identified, action will be taken against the operator and this action may include:

- **the condemnation of meat ABP prepared where packets are discovered improperly staining or labelled;**
- **issue of Statutory Compliance Notices, such as a Notice prohibiting the sale of ABP meat;**
- **suspension or withdrawal of the licence to operate a Collection Centre and/or a knackery as provided for in Regulation 12(6) of the European Union (Animal by-products) Regulations 2014;**
- **or prosecution as provided for in Regulation (3)(2) of the aforementioned Regulations.**

I would appreciate if you would convey to your members the Department's concerns in relation to the implementation of this policy and its determination to deal with any illegal practices in the sale of meat ABP.

If you have any queries, please ring me on 057 8694356.

Yours sincerely,



Mairéad Broderick,
Milk & Meat Hygiene/ABP/TSE Division,
Grattan House, Grattan Business Centre,
Portlaoise, Co Laois.

cc: Irish Coursing Club, All Knackeries, All Independent Collection Centres.