



Food Safety Information Notice 06-2025

Seafood Operators and their obligations under Animal By Products Regulations

The Sea Fisheries Protection Authority has issued this Information Notice in relation to Seafood operators and their obligations under the Animal By Products Regulations.

The following Information Notice is superseded by this current Information Notice:

- **01-2023 Seafood Operators Guidance on Animal By Products Requirements.**

Legislative Basis / Relevant Documentation

- Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety
- Regulation (EC) No 852/2004 on hygiene of food stuffs
- Regulation (EC) No 853/2004 laying down specific hygiene rules for food of animal origin
- European Communities (Food and Feed Hygiene) Regulations 2020 S.I. No. 22 of 2020

Animal By Product Regulations

- Commission Regulation (EU) No 142/2011 laying down health rules as regards animal by-products not intended for human consumption
- Commission Regulation (EC) No 1069/2009 laying down health rules as regards animal by-products and derived products not intended for human consumption
- European Union (Animal By-Products) Regulations 2014 S.I. No 187 of 2014

Feed Regulations

- Regulation (EC) No 1831/2003 of the European Parliament and of the Council of 22 October 2003 laying down requirements for feed hygiene

Trader Notice

- [Trader Notice 02/2024 - Commercial Document for the Transport of Animal By-Products or Derived Products not Intended for Human Consumption](#)

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What is Animal By Products?

Animal by-products (ABPs) are materials of animal origin but not consumed by humans. In the seafood industry, these include, but are not limited to:

- Inedible parts from slaughtered animals intended for human consumption or not placed on the market as food. This category includes fish skin, heads, tails, bones, offal, shells with flesh attached.
- Bodies of finfish, live bivalve molluscs and other molluscs that have died either in the wild or within aquaculture farms and classified production areas.
- Former foodstuff of animal origin, such as fish, which have been deemed unfit for human consumption due to commercial reasons, quality, production failures etc.
- Bait used by commercial fishing fleet.

Categorising Animal By Products

ABPs possess a potential risk to transmitting diseases to humans or animals if not appropriately managed and processed. Therefore, it's imperative to categorise ABPs accurately based on their associated risk levels. There are three distinct categories for ABPs, each representing a different level of potential risk:

- **Category 1 (Cat 1):** This category represents the highest risk material. These ABPs may carry severe diseases that can be easily transmitted to humans and other animals.
- **Category 2 (Cat 2):** This category represents intermediate risk material. These ABPs may carry diseases, albeit at a reduced risk compared to Category 1.
- **Category 3 (Cat 3):** This category represents the lowest risk material. ABPs under this category are less likely to transmit diseases, but still require proper handling and processing to ensure safety.

See Table 1 for further detail on the Categorisation and labelling of Animal by Products.

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Table 1: Categorisation and labelling of Animal By Products

Category	Risk	Labelling	Examples	Disposal
1	High	Category 1 material - 'For Disposal Only' <i>Must be stated on each bin or container</i>	ABP containing residues of prohibited substances such as marine biotoxins, PCBs or dioxins that exceed limits set for products intended for human consumption. This material is for disposal only. -scallop offal. - shellfish meat that may not be placed on the market for human consumption, for example from a closed harvesting area	An approved Category 1 Incineration. Click for list of Rendering plants Further detail as per Article 12 of Regulation (EC) No. 1069/2009
2	Intermediate	Category 2 material - 'not for animal consumption' <i>Must be stated on each bin or container</i>	- mortalities of finfish and shellfish - fishery products deemed unfit for human consumption due to legislative limits exceeded i.e., microbiological – histamine, L mono, salmonella	An approved Category 2 Click for list of Composting plants Further detail as per Article 13 of Regulation (EC) No. 1069/2009
3	Low	Category 3 material - 'not for human consumption' <i>Must be stated on each bin or container</i>	- fish caught for the purpose of fishmeal production, - finfish by-products including heads, tails, frames & offal of wild caught and farmed fish, - shells from crustaceans and bivalve molluscs with flesh attached. - Bait used by the commercial fishing fleet.	An approved Category 3 plant Click for list of Rendering plants Click for list of Composting plants Click for list of Intermediate plant supplying petfood Further detail as per Article 14 of Regulation (EC) No. 1069/2009

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Requirements of Food Business Operators

Food Business Operators (FBO's), including fishermen and processors, must adhere to regulations concerning the disposal of mollusc shells, crustacean processing waste, and other animal by-products including bait. Any business producing material of animal origin that is not intended for human consumption must understand and comply with regulations applicable to their business. The person possessing the ABP material at any stage in the chain is responsible for ensuring compliance with the animal by-products regulations.

For registered and approved FBO's, the following waste and animal by-products requirements need to be in place.

- ✓ An adequate waste policy in place, this can be either documented or electronic.
- ✓ Systems in place:
 - ✓ to avoid the accumulation of waste and ABP in production areas, to avoid contamination of food.
 - ✓ for the proper disposal of ABP arising from processing activities.
 - ✓ for the appropriate categorisation, separation, segregation, and disposal by registered haulier of ABP.
- ✓ Reusable containers for ABP must be:
 - designed to be leak-proof,
 - clearly identified,
 - and appropriately labelled according to category of waste contained, i.e. CAT 3 material not for human consumption,
 - the FBO must use an approved waste disposal collector.
- ✓ Traceability records (Commercial Documents) for all transport of ABP including bait shall be retained at the premises for three years and be readily available for inspection.
- ✓ System in place to ensure that fishery products derived from Live Bivalve Mollusc containing marine biotoxins in excess of legal limits are declared unfit for human consumption.
- ✓ Under the feed legislation, bait from aquatic animals is included in the definition of feed. Feed may only be sourced from establishments which are registered and/or approved in accordance with this Regulation (EC) No 183/2005. Food Business operators, including fish processors who are supplying parts of fish for use as bait must register as a feed business operator with DAFM, the form for this registration is available at gov.ie - FBO (Feed Business Operator) Application Form (www.gov.ie)

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Commercial Documentation

FBOs involved in the transportation of ABPs or derived products including bait must ensure the accompanying of a commercial document with each consignment. For further information on Commercial Documents and their applicability to the transporting of ABP please refer to the Department of Agriculture, Food and Marine trader notice [Trader Notice 02/2024 - Commercial Document for the Transport of Animal By-Products or Derived Products not Intended for Human Consumption](#)

Transport of Animal By-Products

FBOs involved in transporting ABPs including bait must register with the Department of Agriculture, Food and Marine. To register, click on following DAFM link to download application form: [gov.ie - Animal By Product Processing Operations – Transporters \(www.gov.ie\)](#)

When transporting ABPs or any ABP derived products including bait, the operator must adhere to the following:

- use vehicles and containers that are covered and leak-proof,
- clean, disinfected, and dry vehicles and containers before and after every use,
- keep different categories of ABPs in separate, labelled containers and separate parts of the vehicle.

Keeping records of consignments

Operators must retain a record of any consignments of ABPs or derived products including bait that exit their premises. These can be recorded in the accompanying commercial document or a logbook. The operator must record the following:

- the date the consignment was sent,
- a description of the sent material, including its ABP category,
- the weight, volume, and quantity of the sent material,
- the location where the material was sent.

Disposal of Shellfish Shells & ABP Regulations

ABP regulations do not encompass shells from shellfish once all soft tissue and flesh have been fully removed. Operators intending to dispose of such clean shells by spreading on land should consult their waste permit. This ensures they hold the necessary permissions for this disposal method. In case of uncertainty regarding waste permit conditions, it is recommended to seek clarification from the Environmental Protection Authority or the Local Authority.

Contact Details

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