

# MANAGING THE SAFETY OF DOMESTICALLY PRODUCED PET MEAT, AND IMPORTED AND DOMESTICALLY PRODUCED PET FOOD

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Report of the Standing Council on Primary Industries  
Pet Food Controls Working Group

January 2012

This document details issues pertaining to the Standing Council on Primary Industries (SCoPI) Pet Food Controls Working Group's Terms of Reference (see Attachment A).

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## EXECUTIVE SUMMARY

In Australia different systems for achieving the safety of pet meat and pet food have evolved. Pet meat is understood to be ‘meat in a raw state that is intended as food for pets.’<sup>1</sup> Pet food is understood to be ‘food for dogs or cats including all types of dry, semi-moist, retorted, pasteurized and other food manufactured for consumption by domesticated dogs or cats but excluding pet meat.’<sup>2</sup> The working group considers maintenance of different approaches remains appropriate for the two sectors at this time.

The main controls for pet meat safety includes the PISC Technical Report 88 – Amended 2009 ‘*Standard for the Hygienic Production of Pet Meat*’ and various state/territory legislation specific for pet meat (mostly aimed at ensuring that pet meat does not enter the human food chain). The ‘*Standard for the Hygienic Production of Pet Meat*’ is only implemented via regulation in some jurisdictions.

The main controls for pet food safety include the new ‘*Australian Standard for the Manufacturing & Marketing of Pet Food* (AS5812:2011).’ AS5812:2011 replaced the Pet Food Industry Association of Australia (PFIAA) ‘*Code of Practice for the Manufacturing and Marketing of Pet Food*.’ AS5812:2011 currently has no legal status for enforcement, however the PFIAA (who represent over 98% of pet food sold by volume in Australia) have committed to implement a voluntary Hazard Analysis and Critical Control Points (HACCP) and Quality Assurance (QA) audit and accreditation program based upon this new Standard. The PFIAA has also recently published on their website a ‘*Reference List of Contaminants and Residues in Pet Food and Ingredients with Safety Risks*’ to guide manufacturers/producers in complying with AS5812:2011 which requires them to consider the hazards posed by certain ingredients, contaminants, or residues in ingredients, or in the product post-processing, when establishing HACCP and QA plans.

Controls applicable to both pet meat and pet food include quarantine laws for imported products (imported pet food currently occupies less than 10% of the Australian pet food market), and Australia’s generic consumer policy framework. In addition, a ‘*Pet Food Adverse Event System of Tracking (PetFAST)*’ is currently being implemented through a joint initiative of the Australian Veterinary Association (AVA) and the PFIAA. This is a new veterinary reporting system to track all suspected cases of adverse events associated with pet food and pet meat in Australia and is expected to assist in identification of adverse event clusters and their cause(s) so that any necessary preventive strategies can be implemented as rapidly as possible.

Relatively large scale pet food or pet meat safety incidents in Australia that had occurred in the few years prior to the establishment of the Working Group, and prior to the first publication of AS5812:2011 and prior to the development of the *PetFAST* system, included:

- an incident commencing in late 2008 where cats became ill or died from consuming an imported pet food product that had been irradiated for quarantine purposes;
- kidney disease and deaths in dogs associated with the feeding of particular imported treats and dental chews;

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<sup>1</sup> As per Section 3 Definitions, PISC Technical Report 88 – Amended 2009, ‘*Standard for the Hygienic Production of Pet Meat*.’

<sup>2</sup> As per Section 1.4 Definitions, Australian Standard 5812:2011 ‘*Manufacturing and Marketing of Pet Food*.’

- the longstanding problem of illness and deaths from thiamine deficiency in cats and dogs from consuming sulphite preservative treated pet meat and pet food;
- illness and deaths in pets following consumption of domestically sourced camel/horse meat/offal containing indospicine, a toxin in plants consumed by camels/horses which accumulates in their tissues; and
- illness and deaths in pets from hypercalcaemia caused by excessive dietary vitamin D in some pet food products.

Irradiation as a quarantine treatment option for imported cat food no longer exists and imported dog food subject to irradiation is now required to be labelled ‘must not be fed to cats.’

In consideration of the nature and management of the pet food safety incidents above, and the new industry developments to safeguard pet food safety, with the exception of thiamine deficiency from sulphite treated pet meat, the Working Group is of the opinion that there is no justification at this time for new official oversight. This view is supported on economic grounds by the findings in the September 2011 Australian Bureau of Agricultural and Resource Economics and Sciences (ABARES) Report ‘*Pet Food Safety in Australia: Economic Assessment of Policy Options*,’ a report which was commissioned by the Working Group.

Important issues identified by the Working Group included the uptake and compliance with the new AS5812:2011, and the management and operations of the new AVA-PFIAA PetFAST tracking system, issues that should be independently reviewed in 3-5 years time.

Regarding the long standing problem of feeding fresh pet meat treated with sulphite preservatives<sup>3</sup> to pets as part or all of their diet, it is scientifically accepted that sulphites destroy the essential vitamin thiamine in meat and many cats and dogs have become ill or died because of thiamine deficiency. Many pet meat producers operate on a small scale and are not represented by an industry body, and there is very little commercial incentive for pet meat producers to self-regulate on account of any standard that may address this issue. The Working Group is of the opinion that a regulatory gap exists in relation to thiamine deficiency and that additional controls could assist in preventing these incidents.

To improve pet meat safety, particularly in regards to thiamine deficiency, several options exist. One is requiring pet meat manufacturers to comply under law with an updated ‘*Standard for the Hygienic Production of Pet Meat*’ which would include safeguards for preventing thiamine deficiency caused by sulphite preservatives. Another is for states to directly regulate in this area, without referencing any standard in legislation. Provisions could include providing for consumer education through product labelling, banning sulphite preservative use, allowing for the use of alternative preservatives, and/or thiamine fortification.

The Working Group considers that the best approach to be taken to address this gap is to request Animal Health Committee (AHC) to review the ‘*Standard for the Hygienic Production of Pet Meat*’ with a view to harmonizing it with AS5812:2011 where appropriate. This would include consideration of AS5812:2011 labelling and nutrition provisions on

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<sup>3</sup> ‘Sulphur dioxide or sodium or potassium sulphites’ are referred to in section 3.1.10 of AS5812:2011. This reference can be understood to include within its scope the commonly used preservative sodium metabisulphite which releases sulphur dioxide when it contacts water and other compounds, such as in meat.

thiamine sufficiency. More broadly the AHC Working Group should be requested to make recommendations overall on how the '*Standard for the Hygienic Production of Pet Meat*' is or is-not to be implemented by the states and territories, and on any other mechanisms for managing thiamine deficiency, and pet meat safety more generally.

The Working Group Chair investigated how a report, tracking and recall system could be accommodated by the Australian Competition and Consumer Commission and/or Food Standards Australia New Zealand (FSANZ). Legislative amendments and additional funding would need to be made available for these agencies to fulfil such functions. While some overseas governments have assumed responsibility for tracking adverse pet food events (eg. the USA Pet Event Tracking Network), it was the opinion of the Working Group that the objects of such a system in Australia would be better achieved through the AVA-PFIAA partnership and the new PetFAST system.

In relation to mandating recalls, advice from FSANZ was that it was very rare that regulatory intervention is required by ordering an official recall of any human food product in the supply chain. Advice was that it is very much in the commercial interest of a human food business to recall food which poses a health and safety risk to consumers. Both the '*Standard for the Hygienic Production of Pet Meat*' and AS5812:2011 have provisions on product identification, tracing and recall. The Working Group did not consider the extension of current regulatory frameworks to provide for official powers to enable the mandating of pet food recalls as being necessary.

With regards to import controls, because of Australia's World Trade Organization (WTO) obligations, imported pet food cannot be required by government to comply with AS5812:2011 without it being legally enforced at the domestic level. States and Territories would also need to agree to refer power to the Commonwealth to regulate imported pet food beyond quarantine (similar to human food imports), since the Commonwealth Constitution does not provide any express legislative power for the Commonwealth to engage in such activities. The PFIAA has advised that the majority of international manufacturers who export pet food to Australia, and most importers of these products, are PFIAA members. PFIAA is encouraging all its members, including importers, to comply with AS5812 and will be offering accreditation for all its members including importers. The process for becoming AS5812:2011 accredited for international PFIAA members who export to Australia is the same as for domestic manufacturers – they will need to use an accredited third party auditor to verify and provide a report to the PFIAA.

The Working Group considers that the measures that it has identified in its Report provide a high level of ongoing assurance that Australians will enjoy access to a safe pet meat and pet food supply.

## BACKGROUND

1. Following several relatively large scale incidents of health issues in pets that had been linked to pet foods, PIMC (now Standing Council on Primary Industries (SCoPI)) agreed at its 15<sup>th</sup> meeting on 21 May 2009 to establish a working group to examine mechanisms to provide an authority for governments to manage the safety of imported and domestically produced pet food, including mandating of tests or recalls, and report through the Primary Industries Standing Committee (PISC) to PIMC. The terms of reference for the Working Group as subsequently endorsed by PIMC out of session are included at Attachment A.
2. The Working Group, chaired by DAFF Biosecurity (Animal Health Programs), and including membership from DAFF Biosecurity (Export Standards), DAFF Biosecurity (Animal Biosecurity), the AVA, the PFIAA, RSPCA Australia, and state authority representatives (New South Wales and Victoria Department of Primary Industries; Safe Food Production Queensland) convened by teleconference on 5 August 2009, 11 September 2009, 22 June 2010, 13 December 2010, 25 May 2011 and by face-to-face meeting on 14 October 2011 and 6 December 2011. It had been agreed that the Working Group would consult with the former Meat Standards Committee members as necessary to progress its tasks.
3. Shortly after PIMC agreed to establish the Working Group, the PFIAA publically announced its commitment to updating its '*Code of Practice for the Manufacturing & Marketing of Pet Food*' into a comprehensive Australian Standard through the Standards Australia process. This involved an industry-stakeholder working group established by Standards Australia (with representation very similar to the PIMC Pet Food Controls Working Group – i.e. PFIAA, DAFF, AVA, RSPCA Australia, and the Victorian Department of Primary Industries) followed by a public consultation phase.
4. This Standards Australia Pet Food Working Group was convened thirteen times, mostly via teleconference, between December 2009 and February 2011. The finalized Australian Standard (AS 5812:2011) '*Manufacturing and Marketing of Pet Food*' was first published on 10 March 2011 (see Enclosure 2 – NOT PUBLICALLY AVAILABLE - is available for purchase from SAI-Global (<http://www.saiglobal.com>)).
5. The PIMC Working Group was to report to PIMC in November 2009. Agreement was sought from PIMC (PIMC18 OOS01) to allow the Working Group to continue its work in parallel with the process of development of the Australian Standard, but with an extended reporting deadline that allowed the outcome of the Standards Australia process to be considered.
6. Following the completion of the Australian Standard for the *Manufacturing and Marketing of Pet Food*, the PIMC Working Group requested the Australian Bureau of Agricultural and Resource Economics and Sciences (ABARES) to undertake an economic assessment of the different policy options for managing the safety of imported and domestically produced pet food. The final ABARES Report is included at Enclosure 1 (also available at <http://www.daff.gov.au/abares/publications>).

## CURRENT CONTROLS

7. In Australia different systems for achieving the safety of pet meat<sup>4</sup> and pet food<sup>5</sup> have evolved. Although there is no current national regulatory approach to control the domestic manufacture or importation of pet meat/foods to ensure their safety for pets, a number of industry and jurisdictional controls over the safety of pet meat/food sold in Australia exist. These include:

### *The Australian Standard for the Manufacturing & Marketing of Pet Food (AS5812:2011)*

8. This voluntary Australian Standard, first published in 2011, applies to production of manufactured pet foods sold in Australia. It covers production of pet food from sourcing and receipt of ingredients to storage, processing and heat treatments, packing, labelling and storage of products. It also includes instructions for the uniform application of information provided on labels. AS 5812:2011 is intended to protect consumers and the public by providing for control over potential hazards to animal health that might be associated with pet food. It also takes into account potential hazards to human health that might arise from cross contamination from pet food to human food. The Australian Standard is also intended to provide for the production of products of consistent quality.
9. The PFIAA (who represent over 98% of pet food sold by volume in Australia) have devised an audit and accreditation program for its members who volunteer to seek compliance with AS5812:2011. PFIAA will issue AS5812:2011 accreditation certificates for its members on receipt of the PFIAA audit report form duly signed by an approved third party auditor. Accreditation listing will be made available to government to demonstrate commitment to the new Standard. PFIAA members who are accredited to AS5812:2011 may use the following descriptor on products and marketing materials where products have been manufactured on a site which complies with accreditation criteria – ‘Accredited to AS5812.’
10. The PFIAA have also recently published on their website a ‘*Reference List of Contaminants and Residues in Pet Food and Ingredients with Safety Risks*’ ([Enclosure 3](#)) to guide manufacturers/producers in complying with AS5812:2011. AS5812:2011 requires manufacturers/producers to consider the hazards posed by certain ingredients, contaminants, or residues in ingredients, or in the product post-processing, when establishing HACCP and QA plans.

### *The Primary Industries Standing Committee (PISC) Technical Report 88 – Amended 2009 Standard for the Hygienic Production of Pet Meat (previously AS4841:2006) ([Enclosure 4](#))*

11. This Standard applies to the processing of all animals used in the production of pet meat. It applies to the production of frozen and fresh pet meat derived from animals slaughtered and processed at a processing establishment, as well as wild animals killed

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<sup>4</sup> ‘Meat in a raw state that is intended as food for pets’ – as per Section 3 Definitions, PISC Technical Report 88 – Amended 2009, ‘*Standard for the Hygienic Production of Pet Meat*.’

<sup>5</sup> ‘Food for dogs or cats including all types of dry, semi-moist, retorted, pasteurized and other food manufactured for consumption by domesticated dogs or cats but excluding pet meat’ – as per Section 1.4 Definitions, Australian Standard 5812:2011 ‘*Manufacturing and Marketing of Pet Food*.’

in their natural environment. It also applies to the production of raw material that must be subject to thermal processing before sale (i.e. red-banded). It contains the minimum requirements for hygiene in harvesting, transportation, processing, identification, packaging and storage. Provision is also made in the Standard for the use of fallen stock.

12. Animal Health Committee, under the Primary Industries Standing Committee, has responsibility for the content of this Standard. There is no 'pet meat' industry body to implement this Standard. The device of calling up this Standard under legislation is only applied by some states/territories. In some states compliance with this Standard is a condition of pet meat establishment licensing. Most states/territories do not require full compliance. Compliance can be based on pet meat establishments having an approved Quality Assurance program, which sets out standard operating procedures to ensure compliance with the Standard, audited by person(s) from a contracted Accredited Certification Body.

*Australian Pesticides and Veterinary Medicines Authority (APVMA) - Guidelines for Therapeutic Pet Foods That Require Registration by the APVMA as Veterinary Chemical Products*

13. Under the Agvet Codes of the participating states and territories, veterinary chemical products must be registered by the APVMA. 'Veterinary chemical product' is broadly defined in these Codes (see AgVet Code section 5 'Definition of a veterinary chemical product'). Certain products are excluded from that definition and are declared not to be veterinary chemical products (see AgVet Code Regulations 8 Definition of a veterinary chemical product in Appendix 1). Products that fit the exemption provisions of the AgVet Code Regulations do not need to be registered by the APVMA.
14. The AgVet Codes do not recognise pet foods as a separate type of veterinary chemical product and so the claims made on the label of the pet food product are an important factor in determining whether or not the product needs to be registered. In addition pet foods may fall into the definition of a veterinary chemical product by virtue of what they contain or are used for (ie when they are specifically formulated and used as therapeutic pet foods).

*State and territory legislation for pet meat and pet food:*

15. These include (hyperlinked):
  - [Victorian Meat Industry Act 1993](#)
  - [Victorian Meat Industry Regulations 2005](#)
  - [South Australian Primary Produce \(Food Safety Schemes\) Act 2004](#)
  - [South Australian Primary Produce \(Food Safety Schemes\) \(Meat Industry\) Regulations 2006](#)
  - [NSW Food Act 2003](#)
  - [NSW Food Regulation 2010](#)
  - [Queensland Food Production \(Safety\) Act 2000](#)
  - [Queensland Food Production \(Safety\) Regulation 2002](#)
  - [Tasmanian Meat Hygiene Regulations 2003](#)
  - [Tasmanian Code of Practice for Hygienic Production of Pet Food \(2003\)](#)

- [Western Australia Food Regulations 2009](#)
- [Northern Territories Meat Industries Regulations 2002](#)

16. While these laws are primarily aimed at ensuring the safety of meat for human consumption, the legislation also includes provisions which provide for the directing of animal products from the human food supply chain into the pet meat/food supply chain.

The [Competition and Consumer Act 2010](#), enforced by the Australian Competition and Consumer Commission (ACCC) (includes the law known previously as the Trade Practices Act 1974)

17. This legislation provides general and specific consumer protections covering: misleading and deceptive conduct; unconscionable conduct; unfair practices; consumer transactions; statutory consumer guarantees; a standard consumer product safety law for consumer goods; and product-related services.

*Imported pet food and international standards and obligations (Enclosure 5)*

18. Under the *Quarantine Act 1908*, administered by DAFF Biosecurity, regulation of imported pet food is limited to quarantine issues.<sup>6</sup> As Australia is a signatory to the World Trade Organization (WTO) Sanitary and Phytosanitary Agreement, Australia is obliged to apply import measures that are consistent with the relevant international standard unless otherwise justified by scientific risk assessment, and to apply import measures that are no more stringent than those applied domestically. There is currently no international standard for pet food safety and no existing nationally mandated domestic controls.
19. The World Organisation for Animal Health (OIE) announced in its November 2008 Animal Production Food Safety Working Group meeting that it would develop recommendations on feed for animals that are not used for food production (i.e. pets). This OIE work continues.
20. Imported pet food currently occupies less than 10% of the Australian pet food market. The PFIAA has advised that the majority of international manufacturers who export pet food to Australia, and most importers of these products, are PFIAA members. PFIAA is encouraging all its members to comply with AS5812:2011 and will be offering accreditation for all its members including importers. The process for becoming AS5812:2011 accredited for international PFIAA members who export to Australia is the same as for domestic manufacturers – they will need to use an accredited third party auditor to verify manufacturing controls and provide a report to the PFIAA.
21. Australia does not currently allow the importation of pet meat on account of quarantine concerns.

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<sup>6</sup> 'Quarantine' as defined by the *Quarantine Act 1908* includes, but is not limited to, measures 'having as their object the prevention or control of the introduction, establishment or spread of diseases or pests that will or could cause significant damage to human beings, animals, plants, other aspects of the environment or economic activities. In practice, the term has been more narrowly interpreted so as to apply to exotic infectious diseases and pests.

### *Exported pet food and importing country requirements*

22. Pet food manufactured in Australia is exported to various countries such as Singapore, Malaysia, Taiwan, Korea and Japan, and each country has a specific importing requirement.
23. Under the *Export Control (Prescribed Goods – General) Order 2005* (EC(PGG)O's) animal food is declared as a prescribed good and must meet the requirements of the *Export Control Act 1982*, and provisions of the legislation as referred to in the *Export Control Prescribed Goods General Orders 2005* clause 1.07, in order to be eligible for export.
24. The definition of animal food is found in the '*Australian Standard for the Hygienic Production and Transportation of Meat and Meat Products for Human Consumption* (AS 4696:2002)' clause 1.3:
  - (a) a part of any animal or a meat product to which a disposition has been applied enabling it to be recovered for animal food
  - (b) inedible material for use for food for animals.
25. For the purposes of export legislation the definition of animal food does not include biscuits, dried hide pieces or rendered meals. Canned pet food is included in the definition of animal food. Under the *Export Control (Prescribed Goods – General) Order 2005*, animal food is not required to comply with a number of legislated export requirements which apply to other prescribed goods, such as meat and dairy products. For example, establishments producing animal food for export do not require registration by DAFF Biosecurity for export purposes. An export permit is required for the export of prescribed animal food.
26. Where required by the importing country, DAFF Biosecurity is the certifying authority responsible for exportation of animal food, including pet food. Whilst some countries apply minimal import requirements, other countries require exporter declarations and certificates from DAFF Biosecurity. Importing country conditions are based not only on quarantine risks associated with pet food but also include safety, labelling and residue issues. Certification may be based on exporters' statutory declaration for example stating sourcing of product or certifying that the pet food was manufactured in an approved manufacturing plant under approved and hygienic conditions. For some countries certification is based on a specific auditable program implemented by the processing establishment e.g. for the European Union (EU). Other DAFF Biosecurity certification may be based on country freedom from certain diseases such as bovine spongiform encephalopathy and foot and mouth disease.
27. Each importing country has different requirements and it is the exporter's responsibility to ensure that it complies with the importing country's requirements. An example of import requirement is enclosed (Enclosure 6).

### *The proposed National Feed Standard*

28. For animal feeds in the production chain, a National Feed Standard has been proposed under the Primary Industries Standing Committee arrangements to address human food safety risks arising from contaminants in stockfeed. Pet food safety is beyond the scope of this proposed standard.

## CURRENT LEGISLATION SUMMARY

29. A summary of current legislation in respect of pet meat and pet food sourced domestically or imported, or intended for export, is enclosed (Enclosure 7).

## NEW INITIATIVES AND ISSUES

### *The Australian Standard for the Manufacturing & Marketing of Pet Food (AS5812:2011)*

30. The level of uptake and compliance that will be achieved with this new voluntary Australian Standard over the next few years is a key issue in determining if industry-based self-regulation is operating to provide consumers with a high degree of quality assurance of pet food products sold in Australia. This factor is specifically discussed in the ABARES Report '*Pet Food Safety in Australia: Economic Assessment of Policy Options*' (see Enclosure 1) and is the basis for this Report recommending that the operation of the scheme be independently reviewed in 3-5 years.

### *The Pet Food Adverse Event System of Tracking (PetFAST)*

31. In September 2011, a '*Pet Food Adverse Event System of Tracking (PetFAST)*' commenced development and implementation through a joint initiative of the AVA and the PFIAA. It is as a new veterinary reporting system to track all suspected cases of adverse events associated with pet food and pet meat in Australia. The system is also being designed to assist in identification of adverse event clusters and their cause(s) so that any necessary preventive strategies can be implemented as rapidly as possible. It is planned that *PetFAST* will be fully implemented early in 2012. Veterinarians will report details of suspected adverse events associated with pet meat or pet food for dogs and cats, while the AVA and the PFIAA will monitor these reports for similarities that may indicate a significant problem. Should a potential problem be identified, a joint committee of the AVA and the PFIAA will meet to discuss what action should be taken. See: <http://www.ava.com.au/petfast>.

## RECENT PET FOOD SAFETY INCIDENTS

32. In late 2008 an unexplained chronic illness (neurological disease) and death among Sydney cats was reported in the media to be linked to a gourmet imported pet food 'Orijen' manufactured by Champion Petfoods of Alberta, Canada. The company stated that the problem appeared to be restricted to Australia and suggested that an irradiation treatment required for quarantine purposes which it elected to apply on importation may have been a factor. The company has since recalled its products from the Australian market.
33. Biosecurity Australia and AQIS (now DAFF Biosecurity) subsequently investigated the linkage between irradiation and cat health illnesses in consultation with the Australian Veterinary Association and local veterinarians and found that there was sufficient evidence to withdraw irradiation as a quarantine treatment option for imported cat food and required imported dog food subject to irradiation to be labelled

‘must not be fed to cats.’ There is evidence suggesting that irradiated dog food can pose a risk to cats in multi-species households.

34. There have also been incidents involving contaminants, such as melamine, in pet food leading to animal sickness and death. In 2007 in the United State of America (USA) there were more than 8000 cat and dog mortalities linked to melamine contamination in pet food imported from China.
35. Similar concerns have also been raised about potential contamination of animal feed, including imported feed, being introduced into primary production. For example, in 2008, an imported zinc-oxide feed supplement used in piggeries was found to contain high levels of lead that concentrated in organs of pigs and presented potential human health issues. This type of event also has trade implications. Before controls were placed on the affected piggeries, some contaminated offal could have been used in the manufacture of pet food.
36. Proximal renal tubulopathy has also been reported to have occurred in over one hundred Australian dogs associated with the feeding of treats and dental chews. The observed morbidity rate was very high and mortality occurred. Pet health issues which appear to be related to the ingestion of ‘dry chews’ are ongoing and are being investigated further.
37. Thiamine deficiency (including fatalities) in cats and dogs from sulphite preserved<sup>7</sup> pet meat and pet food has been reported regularly in the Australian Veterinary literature for more than twenty years (see Enclosures 8 and 9). Sulphites destroy the essential vitamin thiamine in meat and many cats and dogs have become ill or died because of the deficiency. Thiamine deficiency causes an acute onset of neurologic signs which can be rapidly fatal within days. It can produce a variety of neurological abnormalities that can mimic other diseases. It is highly likely that the incidence of sulphite preservative-induced thiamine deficiency is significantly underreported due to lack of recognition, in part due to the diverse nature of neurologic signs seen and lack of awareness amongst veterinarians and owners. In addition, the up until now lack of a formal adverse reporting mechanism meant that vets have been unable to report cases to a single point.
38. Recently, a number of dogs in Western Australia were suspected to have been poisoned after being fed a feral camel meat diet. The camel meat was found to contain varying levels of indospicine, a natural plant toxin which can cause liver toxicity. Previously, dogs have also been poisoned following ingestion of horse meat contaminated with indospicine (*Australian Veterinary Journal* 1988 report). There are also trade implications as camel and horse meats are exported for human consumption.
39. A number of cats in Australia and overseas on commercial supermarket-obtained cat food have developed clinical hypercalcaemia due to hypervitaminosis D (Foster SF et al *In Preparation*). The hypercalcaemia has resolved relatively rapidly on withdrawal of the particular commercial cat food in each case. The high serum Vitamin D concentrations have decreased slowly over months. In addition, a number of cats being

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<sup>7</sup> ‘Sulphur dioxide or sodium or potassium sulphites’ are referred to in section 3.1.10 of AS5812:2011. This reference can be understood to include within its scope the commonly used preservative sodium metabisulphite which releases sulphur dioxide when it contacts water and other compounds, such as in meat.

fed commercially sourced “cat-grass” have developed hypervitaminosis D due probably to the high vitamin D content of *Dactylis glomerata*.

## FRAMEWORK FOR REGULATION

40. There are three main options which were considered by the Working Group to manage the safety of imported and domestically produced pet food sold in Australia — self regulation, co-regulation and comprehensive regulation.

### *Self Regulation*

41. Under this option, a standard would be developed, administered and enforced by industry to achieve acceptable standards, with no or minimal government involved in its administration and enforcement.
42. This is currently the situation in Australia for pet food with the ‘*Australian Standard for the Manufacturing & Marketing of Pet Food (AS5812:2011)*’ being implemented and administered by the PFIAA. Verification is by means of third party audits of members who elect to comply with the Standard. With over 98% of Australian manufacturers of prepared pet food (by volume) being members of PFIAA, and the majority of imported pet food being purchased from overseas by/from members of the PFIAA, acceptable standards could be achieved were there to be general uptake and compliance. Non-PFIAA members could self-regulate themselves against AS5812:2011 should they wish to.
43. For pet meat, the ‘*Standard for the Hygienic Production of Pet Meat*’ exists; however it is not currently administered and enforced by industry (nor comprehensively by government). To achieve acceptable standards in a self-regulation framework, it would also need to be updated to address significant concerns with thiamine deficiency due to the addition of sulphite preservatives to pet meat. The deficiency of market driver(s), particularly for the many smaller pet meat manufacturers, suggests the continued need for regulatory mechanisms in the pet meat sector.
44. Requirements and procedures for recalling unsafe pet meat and pet food would be part of manufacturer’s quality systems, to meet requirements in industry standards. Industry standards in AS5812:2011 and the ‘*Standard for the Hygienic Production of Pet Meat*’ currently have documentation requirements for product tracing and recall. Strong market drivers would likely exist were there to be a safety incident requiring a recall to be instituted. The industry based *PetFAST* system supports this industry arrangement by providing a mechanism through which to track suspected adverse events associated with pet food and pet meat in Australia, and to assist in identification of adverse event clusters and their cause(s) so that any necessary preventive strategies can be implemented as rapidly as possible.

### *Co-regulation*

45. Under this option, a Standard would still need to be developed as the basis for nationally consistent regulation for both domestically produced and imported pet food. The Standards Australia process which produced AS5812:2011 would seem a logical

route to follow because of its rigour and stakeholder input. It would require industry commitment.

46. The Australian Standard would then need to be put to SCoPI for endorsement and commitment to regulate to the Standard in all jurisdictions. Relevant state/territory and Commonwealth requirements for justifiable, proportional and effective regulation would need to be met.
47. Implementing the relevant regulations in all jurisdictions and the Commonwealth, including regulating to the standard, any associated testing and the power to mandate product recalls, would take an extended period of time, possibly several years. It would allow regulation of imported pet food.
48. Verification of compliance with the Standard could be through a combination of official oversight of industry based third-party audit arrangements, and direct official audits of those manufacturers outside of industry schemes based on the Standard.
49. Animal foods that are to be exported would still remain as prescribed goods under the *Exports Control Act 1982* but exporters' verification and compliance could be carried out through third-party auditors or direct official oversight to underpin DAFF Biosecurity certification, where acceptable to importing country authorities.
50. Adverse event reporting, tracking and investigations programs would operate through a partnership between government, industry and the veterinary profession.
51. Procedures for recalling unsafe pet food would be part of manufacturer's quality systems, and would need to meet requirements of AS5812:2011 and the '*Standard for the Hygienic Production of Pet Meat*'. Official mechanisms would need to be created so as to enable the instituting of a pet food recall in the event a producer was considered to have failed in its duty.

#### *Comprehensive regulation*

52. Under this option, no account is taken of industry standards, quality assurance schemes and third party audits. Governments would develop a national standard and/or regulations, with some input from stakeholders.
53. SCoPI endorsement would need to be sought together with commitment for adoption and enforcement of the national standard/legislative scheme. Relevant state/territory and commonwealth requirements for justifiable, proportional and effective regulation would need to be met. It would allow regulation of imported pet food beyond quarantine to a standard equivalent to the domestic regulatory settings.
54. Animal foods that are to be exported would still remain as prescribed goods under the *Exports Control Act 1982* and would be required to meet the domestic regulatory settings as a minimum. Any additional importing country requirement would also need to be met.
55. Government would establish an adverse events reporting, tracking and investigations system. Government monitoring schemes for testing imported and domestic products for safety concerns would also need to be considered.

56. Regulations would require that all pet food recalls would need to be reported in a timely manner to a government authority that maintains a pet food recall register. Official mechanisms would also need to be legislated so as to enable the instituting of official pet food recalls.

## MARKET FAILURE

57. 'Market failure' refers to 'a situation when a market left to itself does not allocate resources efficiently. Where market failures exist, there is a potential role for government to improve outcomes for the community, the environment, businesses and the economy.
58. Governments may intervene to change the behaviour of businesses or individuals to address market failure or to achieve social and environmental benefits that would otherwise not be delivered. Government intervention is not warranted in every instance of market failure; in some cases the private sector can find alternative solutions'<sup>8</sup>.
59. Options for interventions need to be considered at various levels, from maintaining status quo to complete legislative control.
60. Pet owners and animal welfare groups are likely to advocate for tight regulations, including formal legislative control over pet meat and pet food manufacturing and labelling.
61. Industry groups including manufacturers and importers are likely to argue that the market forces would drive self regulation and minimal intervention is needed.
62. The Australian Government Department of Finance and Deregulation, Office of Best Practice Regulation, provides guidance in relation to national regulatory proposals. Key to recommending regulation is that there is an identifiable problem, such as a market failure.
63. In consideration of the nature and management of the pet food safety incidents described above, and with the exception of thiamine deficiency from sulphite treated pet meat, the Working Group is of the opinion that it is unlikely that regulation would have prevented these safety incidents and that there has not been a true market failure in this respect. The Working Group did however agree that the scale of the pet safety incidents could have been reduced with better reporting and response arrangements. With the new *PetFAST* system being implemented, this gap potentially is now being addressed by industry.
64. The Working Group is thus of the opinion that there is no justification at this time for new official oversight, a view supported by the findings in the September 2011 ABARES Report 'Pet Food Safety in Australia: Economic Assessment of Policy Options' (see below).

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<sup>8</sup> 'Guide to Better Regulation: Appendix A: Types of Market Failure', [http://www.betterregulation.nsw.gov.au/\\_data/assets/pdf\\_file/0009/16956/Better\\_Regulation\\_eGuide\\_Section\\_4\\_-\\_Appendix\\_A\\_-\\_Types\\_of\\_Market\\_Failure.pdf](http://www.betterregulation.nsw.gov.au/_data/assets/pdf_file/0009/16956/Better_Regulation_eGuide_Section_4_-_Appendix_A_-_Types_of_Market_Failure.pdf) (Viewed 9 September 2009)

65. Important issues identified by the Working Group included the uptake and compliance with the new AS5812:2011, and the management and operations of the new AVA-PFIAA PetFAST tracking system, issues that should be independently reviewed in 3-5 years time.

## **ABARES REPORT – FINDINGS ON POLICY OPTIONS**

66. Following the completion of the Australian Standard for the *Manufacturing and Marketing of Pet Food*, the Working Group had requested the Australian Bureau of Agricultural and Resource Economics and Sciences (ABARES) to undertake an economic assessment of the different policy options for managing the safety of imported and domestically produced pet food, namely self-regulation, co-regulation, and government regulation. The ABARES Report '*Pet Food Safety in Australia: Economic Assessment of Policy Options*' was finalized in September 2011 (see Enclosure 1). The key finding in the ABARES Report was that self-regulation is likely to be the most cost-effective policy option to manage pet food safety in Australia for a number of reasons: branding and reputation are important for suppliers in the industry; the upgraded voluntary industry standard has drawn on expertise from industry, key consumer groups and government; AS5812:2011 includes independent third-party verification; and AS5812:2011 includes a product recall mechanism. The critical issue for the future success of the self-regulation approach was considered to be the level of uptake and compliance achieved with the Australian Standard.
67. The ABARES Report also identified the safety issue of thiamine deficiency associated with the use of sulphite preservatives in fresh pet meat for cats and dogs, and identifies regulatory options for preventing this.
68. The findings of the ABARES Report can thus be seen to be consistent with those of the Working Group.

## **ISSUES FOR PET MEAT REGULATION – THIAMINE DEFICIENCY**

69. Many pet meat producers operate on a small scale and are not represented by an industry body. There is very little commercial incentive for pet meat producers to self-implement any program based on the '*Standard for the Hygienic Production of Pet Meat*' (which currently does not have provisions aimed at protecting pets from thiamine deficiency). The Working Group is of the opinion that a regulatory gap exists in relation to thiamine deficiency and that additional controls could assist in preventing these incidents.
70. To improve pet meat safety, particularly in regards to thiamine deficiency, several control mechanisms exist. One is requiring pet meat manufacturers to comply under law with an updated '*Standard for the Hygienic Production of Pet Meat*' which would have safeguards for preventing thiamine deficiency caused by sulphite preservatives. Another is for states to directly regulate in this area, without referencing any standard in legislation. Other options include providing for consumer education through product labelling, banning sulphite preservative use, allowing for the use of alternative preservatives, and thiamine fortification.

71. Some technical problems exist in requiring sulphite treated pet meat having sufficient thiamine, via fortification, present throughout its shelf life. There is anecdotal evidence which suggests that thiamine supplementation of pet meat does not work in practice and therefore if used may not represent a viable approach. Further research that validates the effectiveness of thiamine supplementation would likely need to be done before regulatory provisions requiring sufficient thiamine to be present throughout the shelf life of pet meat products could be enacted.
72. The Working Group considers that the best approach to be taken to address this gap is to request Animal Health Committee (AHC) to review the '*Standard for the Hygienic Production of Pet Meat*' with a view to harmonizing it with AS5812:2011 where appropriate. This would include consideration of AS5812:2011 labelling and nutrition provisions on thiamine sufficiency. More broadly the AHC Working Group should be requested to make recommendations overall on how the '*Standard for the Hygienic Production of Pet Meat*' is or is-not to be implemented by the states and territories, and on any other mechanisms for managing thiamine deficiency, and pet meat safety more generally.

## STAKEHOLDER VIEWS

73. At the commencement of its task, the Working Group sought the views of national stakeholder bodies. The views of some organizations, as expressed below, may have evolved over a period of the Working Group deliberations.

### *Pet Food Industry Association of Australia*

74. The Pet Food Industry Association of Australia has adopted, as a key position, a policy to establish and maintain appropriate standards for regulation of the industry.
75. The current '*Australian Standard for the Manufacturing & Marketing of Pet Food* (AS5812:2011)' is the under-pinning commitment. This Standard has been developed upon the industry's Code of Practice which dates back to the 1970's and has been regularly reviewed to ensure it continues to protect the interests of consumers, the public and enhances goodwill towards the industry. From its inception, the PFIAA Code of Practice has been based upon best practice and the adoption of the responsible standards relating to methods of manufacture, labelling, marketing, nutritional design and claims.
76. The PFIAA initiated conversion of its Code of Practice into an Australia Standard to allow for the process involving a broad range of stakeholders to consider it and form a more robust standard for its industry. The continuation of industry self regulation with reference to the Australian Standard verified by regular auditing should be the preferred option for the regulation for the pet food industry. SCoPI may wish to ensure consistency of consumer retail pet food and pet meat products, especially labeling, and to provide greater oversight of issues relating to both pet food and pet meat.

### *Australian Veterinary Association*

77. The AVA supports self-regulation of the pet food industry in Australia. The major industry body is the PFIAA which represents the majority of pet food and treat

producers in Australia. The PFIAA has had an important role in recent improvements in self-regulation, most notably its support of the '*Australian Standard for the Manufacturing & Marketing of Pet Food* (AS5812:2011)' and its partnership with the AVA in the joint initiative to track all suspected cases of adverse events associated with pet food and pet meat in Australia: '*The Pet Food Adverse Event System of Tracking (PetFAST)*.'

78. The AVA supports the '*Australian Standard for the Manufacturing & Marketing of Pet Food* (AS5812:2011)' and the '*Pet Food Adverse Event System of Tracking (PetFAST)*' as major improvements in the regulation of the pet food industry in Australia that are expected to result in improved health and safety of Australian dogs and cats.
79. The AVA acknowledges that the current regulation of the pet meat industry does not adequately protect dogs and cats consuming pet meat products from adverse health events such as thiamine deficiency caused by consumption of sulphite preservatives. The AVA also acknowledges that there is currently no industry body representing pet meat producers and there is requirement for improved education of, and communication with, pet meat producers about the dangers of using sulphite preservatives in pet meat. These issues could be addressed by improved self-regulation of the pet meat industry. The AVA therefore recommends that pet meat producers be encouraged to become members of the PFIAA.
80. The AVA recommends that all pet foods be comprehensively labelled to include ingredients and levels of preservatives, all additives, and metabolisable energy density as detailed in the '*Australian Standard for the Manufacturing & Marketing of Pet Food* (AS5812:2011).'
81. Further AVA advice is in Enclosure 9.

#### *The RSPCA Australia*

82. RSPCA Australia considers companion animal nutrition to be one of the most important aspects of pet care. RSPCA Australia advocates the comprehensive regulation of the pet food and pet meat industries, both domestically produced and imported, along the entire supply chain to ensure products are safe for pets.
83. RSPCA Australia specifically advocates:
  - The development of a formal independent adverse reporting system for pet food/pet meat.
  - Reliable and accurate labeling information relating to ingredients, additives, complete and not-complete pet food/pet meat and treatments applied such as gamma irradiation for pet food/pet meat.
  - Stringent and mandatory standards for pet food/pet meat to be established. Standards should be consistent and mandatory across all Australian states and territories and apply to all products sold for consumption by pets. Effective systems must be in place to ensure pet food/pet meat products are safe for pets.
  - Safety controls over imported pet food/pet meat products to ensure products are safe for pets.

- A total ban on the irradiation of pet food/pet meat. Since late 2009, there has been a ban on the irradiation of imported cat food. The ban followed the ‘Orijen cat’ incidents and scientific evidence which showed an association between ingestion of irradiated imported cat food and severe neurological impairment, which in some cases was fatal. There is also a requirement that irradiated imported dog food be labelled ‘must not be fed to cats’. A ban on the irradiation of all pet food should be implemented for a number of reasons. Despite label warnings, irradiated dog food may still present a serious risk to cats that ingest irradiated dog food particularly in a multi-species household. Some of the ‘Orijen cats’ only had access to irradiated dog food, not cat food. In addition, there may be as-yet-unidentified health effects on dogs following ingestion of irradiated dog food.
- Comprehensive regulation of the use sulphite preservatives in pet food/pet meat. There should be a legal requirement in all states/territories of Australia that where sulphur dioxide or sodium or potassium sulphites are used the common, prescribed, proprietary name or the FSANZ Food Standards Code number shall be included on the label. Where sulphur dioxide or sodium or potassium sulphites are used, to avoid acute thiamine deficiency in pets, sufficient thiamine shall be present throughout the shelf life of a pet food product. If necessary this may be achieved by thiamine supplementation. Such supplementation may not of itself render the product nutritionally complete, but is to ensure the product is not deficient in thiamine according to AAFCO Official Publication guidelines in pet food/pet meat.
- PISC 88 Technical being comprehensively reviewed to align it with AS5812:2011 in relation to sulphites and adequate thiamine including sections 3.1.10 and 3.3.3. Following these critical amendments to PISC 88, the revised PISC 88 should be legally adopted/applied in all states/territories of Australia. Note that there are no mechanisms available for a self-regulatory or other industry driven mechanism for the pet meat sector.

*CHOICE (formerly known as the ‘Australian Consumer Association’)*

84. Choice’s verbal advice is that the organisation did not have a “point of policy” on pet food labelling. However Choice’s expectations were that labelling of pet food should be transparent and informative for the buyer in the areas of where the food was produced and whether the ingredients were imported or local.

*State and territory authorities*

85. Views of the jurisdictional authorities represented on the PIMC Working Group are in Enclosure 10 with additional comments from Western Australian and Tasmanian authorities.

*Pet Meat Industry*

86. Pet meat producers currently are not represented by any centralized industry body and thus no view is ascertainable. The PFIAA includes a few larger pet meat producers in its member base, but overall the pet meat industry is not nationally organized.

### *Concerned individuals*

87. Items of correspondence to the Australian Government Minister for Agriculture, Fisheries and Forestry were considered by the Working Group. Numerous items concerned the use of irradiation as a quarantine treatment for imported pet food products. Most of these were received prior to irradiation as a quarantine treatment option for imported cat food being removed. Subsequent ministerial correspondence items on irradiated imported pet food concerned the continued allowance of irradiation as a quarantine option for imported dog food and that labelling requirements for irradiated dog food being insufficient. Items of ministerial correspondence expressing concern over the use of sulphite preservatives in pet meat were also considered.

## **OTHER MATTERS**

### *Irradiation as a Quarantine Option for Imported Pet Food*

88. Since the 2008-09 incidents of illness and deaths in cats associated with imported irradiated pet food, DAFF Biosecurity has revised its policy on irradiation as a quarantine treatment option. Details can be found in 'AQIS Industry Notice 33/2009: Changes to Import Conditions for Pet Foods – Updates to Notices 33/2008-09 and 7/2009' (see Enclosure 11). Other import notices that have been released by DAFF Biosecurity to industry, including prior notices on pet food and irradiation, can be found at: <http://www.daff.gov.au/aqis/import/general-info/ian>. Importantly irradiation as a quarantine treatment option for imported cat food no longer exists and imported dog food subject to irradiation is now required to be labelled 'must not be fed to cats.'
89. Standards regarding irradiated pet food are now provided for in AS5812:2011 (section 3.1.11). These are that 'cat food shall not be irradiated unless safety is demonstrated via an AAFCO (Association of American Feed Control Officials) based feeding trial,' and 'pet food that is irradiated shall be so labelled. The irradiation process and labelling shall be in compliance with regulations. Irradiated dog food shall be labelled 'must not be fed to cats.'

### *Import Issues - other*

90. With Australia being a signatory to the WTO Sanitary and Phytosanitary Agreement, national treatment obligations require that domestic regulation of pet food safety would need to be implemented before equivalent, but not more stringent, controls could be applied to the safety of imported pet food. This could involve, for example, calling up the Australian Standard 5812:2011 by legislation in all states and territories and the Commonwealth.
91. For the Commonwealth to be able to regulate imported pet food beyond quarantine (similar to human food imports), States and Territories would need to agree to refer such power to the Commonwealth since the Commonwealth Constitution does not provide any express legislative power for the Commonwealth to engage in such activities.

## *Export Issues*

92. In the provision of health certification, difficulties can arise where DAFF Biosecurity is required to certify that a product meets importing country requirements where there is a lack of legislative oversight and national legislation to underpin the safety and integrity of pet food production in Australia. This has in some cases resulted in the creation of specific programs to enable DAFF Biosecurity to issue certification e.g. for the EU or Russia.
93. Implementation of AS5812:2011 for the production of pet food will provide an auditable, consistent basis for the certification of pet food exports. The Australian Standard which underpins the production of safe, wholesome pet food in Australia is also likely to be valuable in negotiating access to new markets or negotiating improved market access conditions and in increasing confidence in Australia's systems for the production of pet food for export.

## *Adverse Event Reporting and Investigation*

94. As previously described, up until now there has been no centralized body for the reporting of adverse pet food events in Australia. It is likely that the impact of recently publicized larger scale pet meat and pet food safety incidents could have been reduced had they been reported to a single body where trends and syndromes could be recognized earlier and investigations instigated earlier.
95. The Working Group Chair investigated how a report and tracking system could be accommodated by the Australian Competition and Consumer Commission and/or Food Standards Australia New Zealand (FSANZ). Legislative amendments and additional funding would need to be made available for these agencies to fulfil such functions.
96. In some countries, monitoring and responding to pet food adverse events is a governmental responsibility. The Working Group considered such a system not to be ideal in Australia with respect to expert input or efficiency. Government systems are usually a step removed from the two critical groups with expertise on pet food safety incidents - the veterinary profession and the pet food industry. Some government systems overseas accept reports from the general public which can lack the scientific integrity of investigations and assessments conducted by animal health professionals. Having reporting open to the general public also has the problem of generating many more reports which have to be assessed. An example of an overseas body is the new United States Food and Drug Administration (FDA) Pet Event Tracking Network (PETNet). PETNet is a secure, web based information exchange system that allows FDA and Federal and State Agencies to share initial information about pet-food related incidents, such as illness associated with the consumption of pet food or pet food product defects. More information on PETNet can be found at:  
<http://www.fda.gov/AnimalVeterinary/NewsEvents/CVMUpdates/ucm266207.htm>.

## *Recalls*

97. Both AS 5812:2011 and the '*Standard for the Hygienic Production of Pet Meat*' have provisions in them relating to product tracing and recall. The provisions relate predominately to documentation requirements in terms of retention and information contained in them.
98. No official recall mechanisms exist for pet meat or pet food in any jurisdictions beyond some jurisdictions requiring compliance with the '*Standard for the Hygienic Production of Pet Meat*.' Reporting of, and enforcement of recalls of unsafe pet food, are outside the mandates of the Australian Competition and Consumer Commission (ACCC) and Food Standards Australia New Zealand. Reporting and powers to enforce a recall under commonwealth legislation administered by the ACCC require there to be 'injury to a person.' FSANZ lists human food safety recalls on their website, and their power to order a food product recall where a serious public health and safety risk exists is expressly limited to food intended for human consumption. Legislative amendments and additional funding would need to be made available for these agencies to fulfil recall functions for pet meat/food.
99. Advice from FSANZ was that it was very rare that regulatory intervention is required by ordering an official recall of any human food product in the supply chain, as it is very much in the commercial interest of a human food business to recall food which poses a health and safety risk to consumers. The Working Group considered that similar commercial drivers would exist in the pet meat/food supply chain, and that the extension of current regulatory frameworks to provide for official powers to enable the mandating of pet food recalls as not being necessary.

## **Terms of Reference: Pet Food Controls Working Group**

### **Purpose**

To examine mechanisms to manage the safety of imported and domestically produced pet food including mandating of tests or recalls and report to the Primary Industries Ministerial Council through the Primary Industries Standing Committee.

### **Membership**

- Chair – DAFF
- Two State or Territory agricultural/primary industry agencies (to act on behalf of all jurisdictions)
- Pet Food Industry Association of Australia (PFIAA)
- AQIS
- Australian Veterinary Association
- RSPCA
- Meat Standards Committee
- Safe Food Production Queensland (SFPQ)

In undertaking its work, the Working Group will consult with, engage and solicit expert advice from governments, industry and other relevant stakeholders (e.g. Standards Australia and Australian Competition and Consumer Commission) as required and will have regard to Office of Best Practice Regulation guidelines.

### **Terms of reference for the Working Group**

The working group will

- Describe the current control over Pet Food Safety, and identify market failure that may justify any likely need for regulatory intervention in the management of pet food safety.
- If applicable, develop options for the establishment of a framework for regulating the safety of pet food offered for sale in Australia, including management at the border.
- In identifying issues and options the working group should consider:
  - the Pet Food Industry Association of Australia *Code of Practice for the Manufacturing and marketing of Pet food*
  - current animal feed (including the proposed National Feed Standard) and pet food controls in Australia
  - undertake a cost benefit analysis of relevant options for interventions, including analysis of the effectiveness of current arrangements
  - import controls
  - international standards and regulations for pet food
  - WTO obligations

- the appropriateness of the extension of current regulatory frameworks to regulate the manufacturing and marketing of pet food, for example, Australian Competition and Consumer Commission Trade Practices Act provisions
- potential implementation strategies including the role of the Commonwealth, states and territories and funding implications
- Australian Standard 4841 Hygienic Production of Pet Meat
- the potential need to provide authority for governments to mandate tests or recalls, and report through Standing Committee to Council.
- The working group will report to Council in November 2009.