

19 July 2018

Committee Secretary
Senate Standing Committees on Rural and Regional Affairs and Transport
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Dear Committee Members

Regulatory approaches to ensure the safety of pet food

Thank you for the opportunity to comment on the inquiry into pet food safety and regulation. Our enclosed submission is made on behalf of RSPCA Australia and draws on our extensive experience as a leader in animal welfare and in animal welfare legislation and policy.

We trust our submission will be of assistance to the Committee in its deliberations and we welcome the opportunity to speak with the Committee Members in order to ensure pet food is safe, nutritious and meets community expectations.

Yours sincerely,



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RSPCA SUBMISSION

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1. Key recommendations

1. Expand and develop AS5812:2017 into legally enforceable minimum standards for all pet food products sold in Australia
2. Increase transparency for consumers by making the standards freely accessible with periodic reporting on compliance activities undertaken by the federal regulator
3. Ensure all pet food manufacturers undergo auditing against the standards
4. Develop a federal presence tasked with maintaining the standards, facilitating state adoption and harmonisation of the standards in legislation, annual reporting as well as participating in recalls and other pet food safety concerns
5. State and territory governments adopt the standards into existing pet food legislation
6. Explore international regulatory models for pet food safety
7. Consider retaining PetFAST as a reporting mechanism for veterinarians but increase promotion of the system by advertising to the wider veterinary community
8. If retained, ensure information from PetFAST is reported to the state/territory and federal bodies responsible for pet food safety and recalls to allow for coordinated response efforts
9. Increase transparency around PetFAST via annual reporting
10. Investigate consumer facing reporting mechanisms
11. Introduce a mechanism to evoke mandatory pet food recalls
12. Review and update AS4841:2006 (PISC 88) with a view to further minimise the risk of physical and microbiological contamination of pet meat
13. Mandate manufacturers of pet meat products containing sulphite preservatives test end of shelf-life products for thiamine levels to demonstrate compliance with the standards
14. Prohibit the sale of irradiated pet food products and pet treats
15. Make compliance with the standards mandatory for all imported pet treats
16. Expand the standards to include minimum safety and nutrition requirements for the manufacturing of pet food for exotic pets

2. Enforceable standards

Australia has one of the highest rates of pet ownership in the world with 62% of households owning at least one pet. There are approximately 4.7 million dogs and 3.8 million pet cats sharing the lives and households of everyday Australians, with more than \$4.2 billion spent every year on pet food¹.

RSPCA Australia has been involved in working groups and reviews into the pet food industry since 2009. The last report out of this process was the Report of the Standing Council of Primary Industries Pet Food Controls Working Group *Managing the safety of domestically produced pet meat, and imported and domestically produced pet food*². A number of recommendations were made in this report with both the revised Australian Standard for the Manufacturing and Marketing of Pet Food (AS5812:2017)³ and the Australian Veterinary Association (AVA) and Pet Food Industry Association of Australia (PFIAA) *Pet Food Adverse Event System of Tracking (PetFAST)*⁴ initiative developed as a result.

These developments were a significant improvement, however as is standard practice with any new initiatives, the report called for an independent review of these measures within 3-5 years². A period of 6 years has passed since the publishing of the working group's report. This senate inquiry is well placed to review the effectiveness of current initiatives and comes amid increasing concerns from the community regarding the safety of pet food.

It is worth noting that 'pet food' can mean many different things. For the purposes of this submission, general use of the term 'pet food' refers to food produced for cats and dogs and includes manufactured wet canned food and dry pet food, fresh pet meat, pet rolls and treats.

TOR (a) - The uptake, compliance and efficacy of the Australian Standard for the Manufacturing and Marketing of Pet Food (AS5812:2017)

RSPCA Australia was involved in the development of both the 2011 and 2017 versions of the Australian Standard for the Manufacturing and Marketing of Pet Food (hereafter referred to as "the standards")³. AS5812:2017 is a significant improvement upon the 2011 version, with 'pet meat' and treats now falling under this standard for the first time.

Unfortunately, the standards are not mandatory and therefore are currently an ineffective mechanism for ensuring pet food safety in Australia. The most recent version of the standards has been published in conjunction with Standards Australia, meaning it is now available to non-PFIAA members. However there is a substantial financial barrier placed on accessing these standards. This financial barrier makes the standards inaccessible to members of the public and other interested parties. Australian consumers should be able to freely access the standards in order to make informed and appropriate choices for their pets.

Currently, we expect that the only organisation who may know the level of uptake of the standards would be the PFIAA. In this sense, we cannot comment on the uptake of the standards. Determining compliance with the standards is also difficult, as only a small number of pet food manufacturer facilities in Australia are audited against the standards⁵. The rest of the manufacturers who are members of the PFIAA claim to be compliant with the standards as it is a requirement of PFIAA membership, but no evidence is provided. Demonstrating compliance with the standards via auditing or other mechanisms must be a feature of any mandatory standards.

The efficacy of the standards is similarly unknown. There remains ongoing issues with vitamin deficiencies, nutritional completeness and safety across the pet food markets - manufactured pet food, pet meat and pet treats. These ongoing issues raise concerns regarding the current measures in place to ensure the safety and nutrition of pet food in Australia.

In addition, RSPCA Australia believes the remit of the standards should be expanded beyond cat and dog food to include the food of exotic pets like guinea pigs, rabbits and birds which currently have no safety or nutritional adequacy protections. This is discussed in more detail in 4e below.

Recommendations

1. Expand and develop AS5812:2017 into legally enforceable minimum standards that are referenced in state/territory legislation for all pet food products sold in Australia
2. Increase transparency for consumers by making the standards freely accessible with periodic reporting on compliance activities undertaken by state regulators
3. Ensure all pet food manufacturers that sell into the Australian market demonstrate compliance with the standards

3. Independent oversight

Any regulatory system needs to be transparent, independent and accountable in order to be considered trustworthy by the public. RSPCA Australia considers strengthening the current regulatory system an important mechanism to help improve pet food safety.

a) Government regulation

TOR (d) - The feasibility of an independent body to regulate pet food standards, or an extension of Food Standards Australia New Zealand's remit

RSPCA Australia believes a federal presence to monitor pet food safety and oversee pet food standards is essential. In order to successfully enforce legal, minimum standards, a body needs to be tasked with upholding these regulations. Generally, nationally agreed standards are incorporated into state legislation. Compliance with these standards is a requirement of any license issued by the state governing authority. Compliance can be demonstrated in a number of ways, either via regulatory body auditing or third-party audit reports. Many states have regulatory structures already in place which would make incorporating the standards into primary legislation relatively simple.

It is important to have a national presence within either Food Standards Australia New Zealand (FSANZ) or the federal Department of Agriculture and Water Resources that is responsible for maintaining the standards, liaising with and collecting data from the various state authorities, participating in recalls and publishing annual reports. The current remit of the imports branch of the Department of Agriculture and Water Resources should also be extended to include imported pet food safety.

TOR (f) - The interaction of state, territory and federal legislation

The current regulatory environment for pet food is complex and incomplete. Although several years old, the most recent Department of Agriculture and Water Resources report⁸ provides an accessible summary of the state and federal laws which pertain to pet food manufacturing and safety.

State legislation doesn't specifically address manufactured pet food safety and nutritional adequacy. Any state legislation which mentions pet food is largely concerned with the safety of fresh pet meat, by incorporating the Standard for the Hygienic Production of Pet Meat 2009 (PISC Technical Report 88)⁹. This standard (hereafter referred to as "PISC 88") provides

minimum safety requirements for fresh pet meat to protect human health. Unfortunately issues that have severe implications for pet health, such as fatal thiamine deficiency in fresh pet meat, are ignored in these standards. Thiamine deficiency is discussed in more detail in 4a below. We recommend the states and territories expand existing legislation to cover pet food safety.

TOR (g) - Comparisons with international approaches to the regulation of pet food

There are two major international regulatory systems for pet food that are worth considering. The European Union model¹⁰ and the United States model¹¹. Comparing these regulatory systems in detail is outside the expertise of RSPCA Australia, however it would be useful to consider the pros and cons of each system before considering adoption or adaptation of one of the models.

Recommendations

4. Develop a federal presence tasked with maintaining the standards, facilitating state adoption and harmonisation of the standards in legislation, annual reporting as well as participating in recalls and other pet food safety concerns
5. State and territory governments adopt the standards into existing pet food legislation
6. Explore international regulatory models for pet food safety

b) Recall system

TOR (c) - The management, efficacy and promotion of the AVA-PFIAA administered PetFAST tracking system

It is difficult to comment on the management of the jointly administered AVA-PFIAA PetFAST system from the outside. The PetFAST system was launched in 2012 due to the absence of a system designed to keep track of adverse pet food events⁴. Over the past 6 years the system has been involved in several high profile pet food recalls, including the Weruva BFF cat food recall in 2017⁶ and the Mars Dermocare dog food recall in 2018⁷. In the absence of a mandatory recall system, the PetFAST system has been working well. However there are several components of the system which could be improved.

The first concern with the PetFAST system is the voluntary nature of the recalls. It is voluntary for manufacturers to issue a recall, meaning negotiations have to be entered into between the AVA and the PFIAA to facilitate such a recall. Additionally, the lack of information and transparency provided to the public regarding recalls is a concern. There are no public reports on the outcome of investigations, corrective action taken or how many reports are made to the system annually. Finally, the veterinarians who manage the recall process and undertake trend analysis to identify issues are largely volunteers, meaning their resources are limited and subject to availability.

Both organisations involved with the running of the PetFAST system are membership based organisations, which can lead to issues with compliance regarding recommended recall action from those outside the membership. Additionally, it is this membership based nature of the system which can hamper its uptake and efficacy. The AVA has over 9,500 members in

Australia, a significant portion of the Australian veterinary community. However there are several thousand veterinarians who are not AVA members, and these veterinarians receive no communication regarding the PetFAST system. Additionally, many AVA members fail to engage with AVA communication efforts, leading to another group of veterinarians who are not aware of the PetFAST system. The success of the PetFAST system relies on veterinarians to be both aware and empowered to report incidents. It is currently unknown a) how many veterinarians in Australia are aware of the PetFAST system, b) if veterinarians know how to utilise the system and what should be reported and c) if veterinarians trust the PetFAST system to track pet food safety incidents.

Veterinarians are generally not taught about the standards during their degrees, nor are many aware of the finer details of these standards. This might impact the number of reports made by veterinarians to the system, particularly in new categories covered by the standards such as pet meat and pet treats. Finally, the PetFAST system does not facilitate owner reports of pet food safety concerns. It is well known that a large percentage of pet owners either never or rarely visit the veterinarian¹². For these owners, there is no outlet for them to report pet food safety concerns other than to the manufacturer. Although there are legitimate concerns about the rigorousness of reports made by pet owners directly to authorities, consideration should be given to facilitating pet owner incident reports.

Recommendations

7. Consider retaining PetFAST as a reporting mechanism for veterinarians but increase promotion of the system by advertising to the wider veterinary community
8. If retained, ensure information from PetFAST is reported to the state/territory and federal bodies responsible for pet food safety and recalls to allow for coordinated response efforts
9. Increase transparency around PetFAST via annual reporting
10. Investigate consumer facing reporting mechanisms

TOR (e) - The voluntary and/or mandatory recall framework of pet food products

Currently there is no mandatory recall framework for safety concerns with pet food products. Once a manufacturer initiates a voluntary recall, they are then subject to the normal recall processes as stipulated by the ACCC¹³. However the fact that no mandatory recall framework exists is concerning and a risk to pet health. Any recall is damaging to a brand, more so to brands that manufacture human or pet food¹⁴. The fallout from a recall can last years and cost millions of dollars. This is why, in part, organisations like FSANZ have the power to conduct involuntary recalls to protect human safety if required. The large financial and reputational costs associated with a recall could lead a pet food manufacturer to either delay or avoid a recall that might be in the best interests of pet health. It is crucial that a mechanism exists for mandatory or involuntary recalls to prevent widespread pet food safety incidents, as delays in recalls can result in further pet illness or even deaths. Processes for voluntary recalls should remain.

Recommendations

11. Introduce a mechanism to evoke mandatory pet food recalls

4. Specific issues

TOR (h) - Any other related matters

RSPCA Australia believes there are a number of specific issues that remain either unaddressed or inadequately addressed by current processes. These include the ongoing issues of sulphite preservatives and fatal thiamine deficiency in pet meat, the safety of pet meat, the irradiation of imported pet food, ongoing issues with imported treats and the lack of safety guidelines for pet food produced for exotic pets. These issues are addressed individually below.

a) Sulphite preservatives and fatal thiamine deficiency

TOR (b) - The labelling and nutritional requirements for domestically manufactured pet food

Sulphite preservatives are often used in fresh pet meat products including 'pet mince', 'pet rolls' or 'pet meat'. Sulphite preservatives include sulphur dioxide and potassium sulphite and are used to extend the shelf-life of pet meat products¹⁵. However sulphite preservatives have been shown scientifically to cause potentially fatal¹⁶ thiamine (Vitamin B1) deficiency in dogs and cats for over 20 years¹⁷. Thiamine is an essential vitamin in both dog and cat diets, as these animals are unable to make thiamine naturally¹⁸. It is well established that sulphite preservatives in pet meat degrade thiamine levels over time¹⁹, therefore under the 2017 standards it became a mandatory requirement that any product containing sulphite preservatives must have sufficient thiamine levels across the entire shelf-life of the product. Unfortunately these standards are voluntary, and there is no mandatory requirement to test products to ensure thiamine levels are sufficient.

Thiamine deficiency caused by the addition of sulphite preservatives to pet meat is a longstanding pet food safety issue which has caused the deaths and severe illness of many cats and dogs across Australia¹⁶⁻²⁰. In RSPCA Australia's view, immediate action is necessary to prevent any further deaths from sulphite preservative-induced thiamine deficiency. The issue of sulphite preservatives extends beyond pet meat products, as the preservatives can cause thiamine deficiency even if fed in conjunction with other foods that don't contain sulphites²⁰. For example, if an owner mixes commercial dry food with pet meat, the sulphites in the pet meat will interact with the thiamine in the commercial dry food. For this reason, manufacturers must be required to demonstrate compliance with the standards by having end of shelf-life products tested for adequate thiamine levels.

Recommendations

12. Mandate manufacturers of pet meat products containing sulphite preservatives test end of shelf-life products for thiamine levels to demonstrate compliance with the standards

b) Pet meat

As discussed previously, pet meat often contains sulphite preservatives which degrade thiamine over time and can lead to thiamine deficiency in pets. However this isn't the only issue associated with pet meat. Pet meat is defined as 'meat in a raw state that is intended as food

for pets' in the Standard for the Hygienic Production of Pet Meat 2009 (PISC 88), however a huge gap exists between the standards for pet meat compared with the standards for human meat. In the USA, where the US Federal Department of Agriculture is responsible for monitoring pet food safety and compliance, pet meat safety incidents occur far more frequently than manufactured pet food safety incidents²¹. These incidents are broadly categorised into two areas: microbiological contamination including *Listeria monocytogenes* and *Salmonella* and physical contamination including plastics²².

Although most states of Australia have regulations governing the production of pet meat, the scope and enforcement of these regulations is often limited. PISC 88 was designed to minimise the risk of pet meat entering the human supply chain and hence doesn't focus on safety provisions for pets. Physical contamination such as metal and plastic, is an issue across all categories of pet food, however microbiological contamination is only really an issue for fresh pet meat as the cooking process associated with manufactured pet food eliminates much of this risk.

As mentioned previously, the PetFAST system hasn't received any reports related to pet meat safety incidents, however microbiological and physical contamination is a real risk. Many of the cuts of meat that are designated pet meat are given this designation due to the high risk of microbiological or 'other' contamination which renders them unsuitable for human consumption. 'Other' contamination can include parasitic cysts such as *Echinococcus granulosus* tapeworm, a parasite with serious implications for human health²³. Therefore it is important to note that contamination is not only a risk for pets, but it also presents a risk to owners who have contact with this contamination.

Recommendations

13. Review and update AS4841:2006 (PISC 88) with a view to further minimise the risk of physical and microbiological contamination of pet meat

c) Irradiation of pet food

RSPCA Australia's position is that pet food must not be irradiated. Irradiation is required for the importation of some pet food and treat products to satisfy quarantine requirements. However, the process of irradiation is known to destroy not only microbiological contamination, but also essential nutrients leading to nutritional deficiencies in animals fed the irradiated food²⁴. This was showcased by the Orijen cat food incident in Australia in 2008, which led to serious neurological illness including paralysis, seizures and deaths in a number of cats²⁵. Although the Department of Agriculture and Water Resources no longer requires imported cat food to be irradiated as an entry requirement, it is understood some imported foods are still undergoing irradiation in their country of origin. Additionally, 2 of the 87 cats diagnosed in 2008 had only eaten Orijen dog food - meaning the risk extends to cats living in multispecies households²⁴. Given the serious consequences (including fatalities) to cats after consuming irradiated pet food, RSPCA Australia believes strongly that no pet food should be irradiated.

Recommendations

14. Prohibit the sale of irradiated pet food products and pet treats

d) Imported treats

Both in Australia and overseas, dogs have developed severe kidney disease²⁶ as a result of eating imported jerky treats²⁷ which has resulted in the deaths of a number of pets. The treats are made in China and are postulated to contain an unidentified toxic substance that results in a kidney disease called acquired renal tubulopathy, also known as Fanconi syndrome. These treats have never been subject to a recall and are still widely sold and distributed throughout Australia. As a result, cases of Fanconi syndrome linked to pet treats continue to be reported by veterinarians across Australia. Many of the companies producing these treats are not members of the PFIAA and do not comply with the standards. Further restrictions should be placed on imported treats until their safety can be assured.

Recommendations

15. Make compliance with the standards mandatory for all imported pet treats

e) Pet food for exotic pets

Currently, there exists no legislation or voluntary standards governing the manufacturing and marketing of pet food for animals that aren't cats or dogs. Pets often called 'exotic' includes birds, rabbits, fish, Guinea pigs, mice, rates, ferrets and reptiles, among others. There are a significant number of 'exotic' pets in Australia with approximately 4.2 million pet birds in Australia living in over 1 million Australian households¹, and about 2.5 million other pets including rabbits, guinea pigs, reptiles, companion horses and other small mammals¹. These other pets are sentient animals, just like cats and dogs, capable of experiencing pain, suffering and distress. Therefore the welfare of these animals matter. A number of pet food issues have been identified for species other than cats and dogs with a couple of examples outlined below.

Rabbits and Guinea Pigs: Many commercially prepared diets for rabbits and guinea pigs are grain-based, however these grain-based feeds can cause gastrointestinal stasis, severe dental disease and obesity²⁸. These diseases are often fatal. Rabbits and guinea pigs require diets high in fibre, predominantly grass and grass hay²⁹. Minimum standards must be implemented to ensure that commercial pet foods for rabbits and guinea pigs are biologically appropriate and do not cause disease.

Birds: Commercial seed diets for birds are high in fat and low in essential vitamins, minerals and amino acids³⁰. Birds fed exclusively on commercial seed diets will develop nutritional deficiencies and experience severe disease and a shortened lifespan. Additionally, many seed diets are contaminated by pesticides with the quality of these diets varying widely among manufacturers³¹. Some birds have an average life expectancy of 60 years, therefore the safety and nutritional adequacy of their food is essential to ensuring good health and welfare.

Currently PFIAA membership does not include manufacturers of exotic pet food, therefore the safety and nutritional adequacy of food produced for these other animals has escaped

consideration or scrutiny. The lack of commercial imperative for raising standards in these exotic pet foods makes including them in mandatory and enforceable standards all the more important. RSPCA Australia believes the standards should be expanded to include minimum safety and nutrition requirements for pet food for exotic pets.

Recommendations

16. Expand the standards to include minimum safety and nutrition requirements for the manufacturing of pet food for exotic pets

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