

# Paul Terrett

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Committee Secretary  
Senate Standing Committee on Rural and Regional Affairs and Transport  
PO Box 6100  
Parliament House  
CANBERRA ACT 2600

Dear Senators,

Thank you for the opportunity to do a submission on *the regulatory approach to ensure the safety of pet food*. As a dog breeder and President of a number of dog clubs, I have a direct interest in the quality and safety of dog food. Annually I expend over \$10,000 on dog food and products.

Australia has one of the highest incidences of pet ownership in the world and pet food expenditure here is estimated to total \$3.01 billion with \$1.61b spent on dogs and \$1.1b spent on cats annually.

Dog food sales in 2018 are set to increase, with prices increasing and the humanisation trend, seeing pet owners increasingly looking after their pets in the same way they look after themselves.

As a breeder, I have a responsibility to promote healthy and safe dog food and products to families buying puppies. While most dog food companies promote puppy packs to promote their brand I cannot be assured by the safety of the product, its country of origin or impact of the contents on the puppies' growth.

The current Australian Standards have not kept up with community expectation where pet food should be manufactured and imported to a high standard.

There is an expectation that pet food is adequately inspected and tested prior to it being released to consumers.

The NSW Food Authority has best practice in the inspection and monitoring of food. This high standard should be extended to pet food brought in from interstate and overseas.

### **Country of origin**

China has become the third-largest pet market in the world home to 27 million dogs and 58 million. This market has resulted in a number of imported products from China coming into Australia.

What is unclear is whether the food has been irradiated and the ethical sourcing of the product, for example is prime meat being used or the leftovers from the abattoirs. Often a beef dog food contains other meat, such as horse or chicken or contains a large amount of grain.

If overseas product is sold in Australia it must meet minimum standards and these standard monitored by a national regulatory body.

### **Exports of dog food**

Natural Pet Corporation, which is the distributor for Optima dog food from Australia, ordered a recall, following reports of sick animals consuming Optima dog food manufactured in Australia - four dogs were poisoned by aflatoxin after eating Optima products. Aflatoxin attacks the liver in several animal species. Although rare in many parts of the world, the fungi that produce aflatoxins can contaminate cereal grains often used in pet foods.

Optima is sold widely in Australia however cases of aflatoxin attacks have not been reported.

### **Imports from China**

Tainted products have been a troubling trend from China. In 2007, the US Food and Drug Administration recalled more than 150 brands of cat and dog food after finding that some pets became ill or died after eating food tainted with melamine. Contaminated additives used in the pet food came from China.

The chemical is commonly used in coatings and laminates, wood adhesives, fabric coatings, ceiling tiles and flame retardants. This resulted in deaths and serious illnesses in up to thousands of pets,

Other examples in Australia include; the “gourmet” Pigs Ear treat sold out of Woolworths. This is an irradiated product imported from overseas, but it does not tell you on the packaging. It does not tell the consumer that the pigs ear comes from China, that it was irradiated anywhere on the label, only states that it was “processed and packed in Australia”.

The only clue that the ear was irradiated are the key words **MUST NOT BE FED TO CATS**. The Australian Standard for Manufacturing and Marketing of Pet Food (AS 5812:2017) stipulates these words are the only labelling requirement for an irradiated and imported pet meat.

Irradiated pet meats are known to kill cats. It is therefore illegal to sell irradiated pet meats to cats. For dogs however, it is unknown what damage it may cause them. Because it is unknown, it is still legal to sell irradiated pet meats for dogs.

Further, imported treats and toys that are chewed by a dog and consumed by young animals show no safety information and where they are meet Australia’s food standards.

### **Product Recall**

Unsafe pet food and animal products should not be left to self-regulation. As demonstrated above, unsafe produces are sold on the Australian market and there is no ability to force a product recall.

A regulatory body must have the power to recall products.

### **Regulatory Body need a Consumer representative**

Given the dominance of Mars Australia Pty Ltd and Nestle Purina Petcare in the Australian market, there is a role for a consumer representative on any regulatory body to ensure that the demands of the consumer is met and that customers have confidence that their interests are being addressed.

### **Responsible Pet Ownership**

While pet food manufacturers sell billions of their product, they spend little on educating the public on responsible pet ownership. Thousands of dogs and cats are euthanized each year and it is left to State Governments to fund dog

registration, dog shelters, desexing programs. It could be argued that pet food manufacturers have an interest in seeing more dogs breed as they consume more of their product.

A 1% levy of all pet food sales should go to the responsible pet ownership program, support hobbies associated with dog and cat ownership, improve dog breeding and conduct research into animal diseases and pet care.

I trust that this information is of assistance.

Yours Sincerely,

Paul Terrett