

Committee Secretary,
Senate Standing Committees on Rural and Regional Affairs and Transport,
Department of the Senate,
PO Box 6100,
Parliament House,
CANBERRA ACT 2600,
AUSTRALIA.

27th July 2018.

Regulatory approaches to ensure the safety of pet food

Submission by petfoodreviews.com.au

Dear Committee,

Consumers expect pet food to be safe.

On behalf of the many pets who have fallen sick or died from pet food-related conditions, and on behalf of the families who have prematurely and heartbreakingly lost their pets, I urge thorough and formal regulation of the Australian Pet Food Industry.

If a single head of cattle, euthanised or baited, re-enters the food chain as pet food, this can lead to severe sickness or death of many pets. If the Australian Pet Food Industry is unable to guarantee this does not happen then pet food products cannot be guaranteed safe.

If a retailer or pet food manufacturer is able to ignore hundreds of product-related complaints, inclusive of seizures, paralysis, severe sickness, blindness, or painful death, with no regulatory body in place to investigate or act, then our self-regulated industry is failing.

Contaminants such as plastic (including ear tags), glass, metal, and other foreign objects commonly occur in pet food, often from insignificant staff training, poor procedures, or lack of care from absence of regulation. Measures need to be put in place to mitigate these risks.

A retailer or pet food manufacturer should be obligated to address issues immediately, alert consumers, or instigate recalls. They should not have complete freedom to deny or ignore issues, often leading to continuing cases of sick or dead pets. If a retailer or pet food manufacturer is unwilling to provide a duty of care or transparency to consumers, then a regulatory body

should be in place to do so.

An effective mechanism for alerts and recalls should be in place. Any instances of toxicity or contaminants within a pet food product should be investigated immediately and independently, logged, and consumers alerted. All manufacturers should be subject to independent product testing, and held accountable for issues that occur with their products.

A consumer has a right to transparency and clarity when buying a pet food product. If a product has been sourced from a country other than Australia, this should be clearly labelled. Misleading statements such as "If the product has been irradiated on import, this too should be clearly labelled, with a warning, on the front of the packaging. If the Australian Standard for Manufacturing and Marketing of Pet Food (AS 5812-2017) requires irradiated meats to be labelled, in small print, "Must not be fed to cats", then it is clear the standards are designed for the benefit of the manufacturer, not the consumer.

A ban on irradiation of imported pet food products should be strongly considered in accordance with RSPCA Australia's long standing position on the issue.

Percentages of all main ingredients should be clearly listed. Ambiguous terms, such as "preservatives", "antioxidants", or "natural flavours", should be replaced with a clear definition of the true ingredient, particularly in regard to chemical or synthetic ingredients.

Percentage of meat content (meat and meat fats) within a product should be clearly listed. For transparency this should be listed on the front of the packaging. For example, if a product is labelled with a formula name of "Beef", or "With Beef", the corresponding total meat ingredient percentage of the product should be clearly depicted, such as "15% meat content".

If a pet food does not meet minimum nutritional guidelines to be classified "complete and balanced", this should be clearly stated on the front of the packaging, not listed on the rear in small print as "for supplemental feeding only".

AS 5812 should be written to offer assurances and clarity to the consumer, not offer manufacturers mechanisms to conceal or manipulate the true nature of their products. The standard should be made publicly available without cost.

Corporate sponsorship and influence of Universities, veterinary studies, and nutrition training is a gross conflict of interest and should be addressed. VetEd and CPD points should not be awarded to veterinarians or veterinary

nurses from a pet food manufacturer, such as Mars Petcare College. Veterinary professionals should be trained to consider pet food products as a potential cause of dietary related conditions, and encouraged to formally log such issues.

A fully independent body without industry control should be put in place to formally regulate the Pet Food Industry of Australia.

As a country we have an opportunity to set precedent for the future health of pets.

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Social media consumer complaints of sickness and death related to Woolworths Baxters products:

<http://www.petfoodreviews.com.au/news/woolworths-baxters-sick-deceased-dog-reports/>

Plastic, mould, and other contaminants in pet food products:

<http://www.abc.net.au/news/2018-05-16/plastic-mould-in-dog-food-prompts-call-for-industry-regulation/9764318>

Dangerously high levels of sulphur dioxide (preservatives) tested in pet food, a precursor to neurological conditions in cats and dogs:

<https://www.news.com.au/national/pet-food-laced-with-dangerously-high-levels-of-sulphur-dioxide-tests-reveal/news-story/4f912d7187490e5b4716ee589d66104a>

RSPCA position on irradiated meats causing neurological impairment (including paralysis) of cats, and how “there may be as yet unidentified health effects on dogs following ingestion of irradiated dog food”. “RSPCA Australia would like to see a ban on the irradiation of all pet food”:

http://kb.rspca.org.au/what-is-rspca-australias-position-on-the-irradiation-of-imported-pet-food-products_307.html