



6 July 2018

Dr Jane Thompson
Committee Secretary
Senate Rural and Regional Affairs and Transport References Committee
PO Box 6100
Parliament House
Canberra ACT 2600

Re: Senate Enquiry - Safety of Pet Food

Dear Dr Thompson,

The Australian Renderers Association Inc (ARA) represents the interests of processors and traders of rendered animal products in Australia. The industry produces rendered protein meals plus tallows and oils which are used extensively in pet foods both domestically and internationally.

The ARA approach to working with government on both communications and engagement relating to market access issues and self-regulation has been well accepted by the Commonwealth who have recommended to a number of industries to review our model for consideration for adoption.

The ARA works closely with the Pet Food Industry Association of Australia (PFIAA) as a major customer of our industry, and understand the work that they have done to improve self-regulation of their industry to date. Following a recommendation from the Commonwealth the PFIAA recently approached the ARA to speak at the May general meeting of their members to provide an overview of how our industry interacts with government and how we operate our accreditation program.

The Terms of Reference for this enquiry call for an understanding of possible regulatory approaches to ensure safety of pet food.

We present here an overview of the self-regulated model utilised by our industry as a possible model for consideration by the senate committee for adoption by the pet food industry.

ARA self-regulation model:

In late 1990's the Australian Rendering industry developed in conjunction with government food safety regulators an Australian Standard for Hygienic Rendering of Animal Products AS5008 which was first published in 2001 as an ARMCANZ standard which all states agreed to implement.

The Standard was later reviewed and updated in 2007 under the Primary Industry Ministerial Council and the Primary Industries Standing Committee.

The industry had developed an industry Code of Practice (CoP) in 1996 and introduced a self-regulated accreditation program, managed by the Association but where establishments were audited by independent third party auditors engaged by the Association. These audits were conducted annually against the CoP. The audit program was recognised by the Commonwealth and the majority of states as proving compliance with animal feed requirements and was an instrumental part of government management of the Ruminant Feed Ban following the outbreak of Bovine Spongiform Encephalopathy, or Mad Cow Disease, in the UK and Europe, and the steps taken to prevent an occurrence domestically.

The industry continued to develop improvements to the Code of Practice with amendments in 2003, 2007, 2011, 2015 and a recent major review which was completed in 2017.

The Association is currently working towards a review of AS5008. Following discussions with all stakeholders it is considered the Standard will be moved to become a National Standard and possibly coming under the jurisdiction of the Australian Meat Regulators Group, which is made up of the CEO's of each state's food regulator organisation.

In 2015 the Commonwealth formally recognised the accreditation program through a Letter of Exchange (LoE) which formalised an arrangement where the Commonwealth considers recommendations that establishments receive export listing as a result of audits conducted under the program.

At the same time, although not a requirement of the Commonwealth LoE, the industry took the step of removing itself from the management of the Accreditation Program and through a Memorandum of Understanding (MoU) engaged a third party independent Certifying Body to manage the program on behalf of the Association. The Association continues to own the program, and drives the development of change and improvement in the program.

Included in new requirements in the recent review of the CoP were requirements to implement annual mock recalls to ensure plants were well prepared should a recall be required.

The updated Accreditation program is underpinned by a comprehensive documented set of rules and operational requirements. The Commonwealth conducts annual audits of compliance of the independent Certifying Body and the approved auditors with the MoU and its duties as the manager of the program under the terms of the LoE. The Commonwealth also conducts annual audits of the ARA and its oversight of the program and compliance with the requirements of the LoE.

State authorities recognise the ARA Accreditation program as providing equivalence to state audit requirements in determining compliance with animal feed regulation.

The ARA is also reviewing the effects of the Export Legislation review and how best to situate rendered products under the new framework to continue to strengthen the integrity of our product.

As such whilst remaining self-regulated, this program provides for adequate supervision by government of the integrity of the system.

Attached please find copies of AS5008 and ARA Code of Practice V3.2

Yours sincerely

Dennis King
Executive Officer