

Chapter 1

Introduction

Referral of the inquiry

1.1 On 20 June 2018 the Senate referred the following matters to the Senate Rural and Regional Affairs and Transport References Committee (committee) for inquiry and report by 30 August 2018:

Possible regulatory approaches to ensure the safety of pet food, including both the domestic manufacture and importation of pet food, with particular reference to:

- (a) the uptake, compliance and efficacy of the Australian Standard for the Manufacturing & Marketing of Pet Food (AS 5812:2017);
- (b) the labelling and nutritional requirements for domestically manufactured pet food;
- (c) the management, efficacy and promotion of the AVA-PFIAA administered PetFAST tracking system;
- (d) the feasibility of an independent body to regulate pet food standards, or an extension of Food Standards Australia New Zealand's remit;
- (e) the voluntary and/or mandatory recall framework of pet food products;
- (f) the interaction of state, territory and federal legislation;
- (g) comparisons with international approaches to the regulation of pet food; and
- (h) any other related matters.¹

1.2 On 16 August 2018, the Senate granted an extension of time for reporting until 16 October 2018.²

Conduct of the inquiry

1.3 Information about the inquiry was made available on the committee webpage. The committee also invited submissions from interested organisations and individuals, and received 151 public submissions. A list of individuals and organisations that made public submissions, together with additional information authorised for publication is at Appendix 1.

1.4 The committee also considered two petitions which were tabled in the Parliament during the inquiry. Petition No. 864, which contained 81 021 signatures,

1 *Journals of the Senate*, No. 100–20 June 2018, pp. 3210–3211.

2 *Journals of the Senate*, No. 109–16 August 2018, pp. 3493–3494.

raised concerns about food safety regulations for pet food. The petition – which was coordinated by Ms Christine Fry and Mr Peter Fry – asked that the Senate consider the recommendations of the committee's inquiry into regulatory approaches, to ensure the safety of pet food.³ Petition No. 865, which contained over 14 500 signatures collected by the consumer group CHOICE, called for both 'stronger pet food regulation' and the enforcement of mandatory standards.⁴

1.5 The committee held public hearings on 28 August 2018 and 29 August 2018 in Sydney, NSW.

1.6 A list of witnesses who appeared at the hearings is at Appendix 2. Submissions and Hansard transcripts of evidence may be accessed through the committee's website.⁵

Acknowledgment

1.7 The committee thanks all the individuals and organisations who made submissions to the inquiry. The committee particularly thanks those individuals who shared personal experiences and stories about their pets and companion animals. The committee acknowledges the emotional impact of these accounts, and thanks witnesses and submitters for their contributions.

Note on references

1.8 References to Hansard are to the proof transcript. Page numbers may vary between the proof and the official (final) Hansard transcript.

Structure and scope of the report

1.9 The report is divided into six chapters. Chapter 1 provides an overview of pet ownership, and pet food controls in Australia.

1.10 Chapter 2 considers a number of pet food safety incidents that have occurred in recent years, including a spate of megaesophagus cases in dogs throughout 2017 and 2018.

1.11 Chapter 3 discusses the regulatory frameworks in place to regulate the pet food industry in other jurisdictions, such as the United States of America (US). The chapter also provides an overview of Australia's self-regulation model, and how this

3 Petition No. 864, was tabled in the Australian Senate on 22 August 2018. See *Senate Hansard*, 22 August 2018, p. 63.

4 Petition No. 865 was tabled in the Australian Senate on 22 August 2018. See *Senate Hansard*, 22 August 2018, p. 64.

5 Parliament of Australia, *Regulatory approaches to ensure the safety of pet food*, https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Rural_and_Regional_Affairs_and_Transport/SafetyofPetFood (accessed 27 August 2018).

interacts with state and territory laws, importation laws, and Australian Consumer Law.

1.12 Chapter 4 considers methods to enhance the safety and integrity of pet food in Australia with focus on the Australian Standard. Chapter 5 considers the major issues raised by submitters and witnesses with regard to the pet food industry, including concerns about efficacy and product recall. Chapter 6 considers methods to strengthen the existing reporting regime and Chapter 7 provides the committee's comments and recommendations.

1.13 The committee notes that a number of submitters and witnesses expressed their views regarding pet diets. Although the committee has considered evidence from a number of veterinary professionals and academics in the field of veterinary nutrition and pathology, matters relating to dietary and nutritional advice are beyond the terms of reference of the inquiry. Therefore, the committee is not in a position to describe the adequacies of a commercial or raw food diet for Australian pets or to test their veracity. Rather, the terms of reference required the committee to consider the transparent and effective regulation of the pet food industry, including the manufacturing, marketing, and supply of pet food.

Pet ownership in Australia

1.14 According to a report by Animal Medicines Australia (AMA), there are more than 24 million pets in Australia today. Australia has one of the highest rates of pet ownership in the world, with 62 per cent of Australian households owning at least one pet. Thirty-eight per cent of households have at least one dog, while 29 per cent have at least one cat.⁶ These figures are summarised in Table 1.1 below:

Table 1.1 – Pet ownership in Australia, 2016

PET OWNERSHIP IN AUSTRALIA, 2016	HOUSEHOLD PENETRATION (%)	TOTAL OWNER HOUSEHOLDS ('000)	ANIMALS PER HOUSEHOLD (AVE.)	TOTAL PET ANIMALS ('000)
Dogs	38.5	3,555.0	1.3	4,759.7
Cats	29.2	2,698.8	1.4	3,883.6
Fish	11.8	1,088.5	8.0	8,729.5
Birds	11.8	1,086.9	3.9	4,187.4
Small mammals	3.1	282.8	1.9	536.9
Reptiles	2.7	250.2	1.7	415.5
Other pets	2.8	256.7	6.1	1,572.9
Pet Owners	62.0	5.7 m		24.1 m
Non-Owners	38.0	3.5 m		

Base: 2016: Total sample, n=2, 022; Q: Thinking now about pets. Which of these pets, if any, do you have in your household?

Note: Reptiles include snakes, turtles/tortoises, lizards and frogs/salamanders. Small mammals include rabbits, guinea pigs, ferrets and mice/rats.

Source: Animal Medicines Australia, *Pet ownership in Australia*, 2016, p. 9.

6 Animal Medicines Australia, *Pet ownership in Australia*, 2016, p. 9.

1.15 Over time, there have been changes in the way Australians view their household pets. Evidence suggests that pets are no longer viewed simply as animals, but have become 'humanised' to the point that they are considered by some to be members of the family. The AMA's 2016 survey found that there has been a significant increase in the proportion of owners who see their pets as a 'fur babies' rather than as mere companions.⁷ Amongst dog owners, 64 per cent now see their pet as a family member while 23 per cent see their dog as a companion. The statistics are similar for cat owners.

1.16 The pet food industry is currently worth over \$4 billion—an increase in worth of 35 per cent since 2013.⁸ Global figures show that in 2017, the pet food market was worth \$94 billion.⁹

1.17 The two converging trends of the 'humanisation' of pets on the one hand, and the burgeoning pet food industry on the other, has resulted in the 'premiumisation' of pet supplies and services. According to the AMA, pet owners are increasingly opting to spend more money in the hope of providing their pets with the best possible life. More often, pet owners are purchasing products from specialty pet superstores, rather than at supermarkets. At the same time, the market for pet treats and healthcare products has continued to growing rapidly, as has the market for natural and organic pet food products.¹⁰

1.18 It is therefore unsurprising that pet owners have high expectations regarding the quality of domestic and imported pet food that they purchase.

Pet food controls in Australia

1.19 While there is no current national regulatory framework to control the domestic manufacture or importation of pet food, it is subject to various standards and codes of practice.

1.20 The pet food industry in Australia is managed under a self-regulation model and the Pet Food Industry Association of Australia (PFIAA) is the peak body for the

7 Animal Medicines Australia, *Pet ownership in Australia*, 2016, pp. 4, 7. Also see: Dr Andrew Spanner, *Committee Hansard*, 28 August 2018, p. 19 and Dr Richard Malik, *Committee Hansard*, 29 August 2018, p. 12.

8 Animal Medicines Australia, *Pet ownership in Australia*, 2016, p. 37. Also see: Angelique Donnellan, 'Plastic, mould found in dog food sparks call for regulation of pet food industry', *ABC News*, 16 May 2018, <http://www.abc.net.au/news/2018-05-16/plastic-mould-in-dog-food-prompts-call-for-industry-regulation/9764318> (accessed 25 June 2018).

9 Amy Fleming, 'Pet food is an environmental disaster – are vegan dogs the answer?', *The Guardian*, 26 June 2018, <https://www.theguardian.com/global/2018/jun/26/pet-food-is-an-environmental-disaster-are-vegan-dogs-the-answer> (accessed 6 July 2018).

10 Animal Medicines Australia, *Pet ownership in Australia*, 2016, pp. 29–38. Also see: Caroline Zambrano, 'Australia's Pet Food Market', *Pet Industry News*, vol.28, no. 2, Winter 2018, pp. 9–15.

pet food industry. Under the existing structure, members of the PIFAA must comply with the terms of a National Code of Practice which sets out the minimum standard expected for the care, management and trade of companion animals. Membership of the PIFAA is conditional upon a member's ongoing compliance with the National Code.

1.21 In addition to the National Code, the PIFAA relies on sector specific standards and guidelines, and in particular, the Australian Standard for the Manufacturing and Marketing of Pet Food (Australian Standard). This standard was first published in March 2011 as Australian Standard 5812:2011. Thereafter, a revised version of the standard, referred to as AS5812:2017, was reissued in 2017 following a review by Standards Australia.

1.22 The Australian Standard is not a publicly available document. It is available for purchase on the SAI-Global website. As a consequence, many submitters to the inquiry were not aware of the existence, let alone the contents of the standard. This circumstance has denied consumers important information which they could otherwise draw on to hold manufactures to account for the pet food they produce and the labelling on their products.

1.23 The Australian Pesticides and Veterinary Medicines Authority (APVMA) regulates pharmaceutical products, complementary medicines and supplements (such as vitamins and glucosamine) for pets. The APVMA is also responsible for the regulation of pesticides (including worm and flea treatments).¹¹

1.24 The states and territories have legislation in place for pet meat and pet food. 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.¹²

1.25 In addition to the Australian Standard, other controls include the *Competition and Consumer Act 2010* which is enforced by the Australian Competition and Consumer Commission (ACCC). This legislation provides general and specific consumer protections covering misleading and deceptive conduct as well as unconscionable conduct, unfair practices, consumer transactions, statutory consumer guarantees, a standard consumer product safety law for consumer goods and product-related services.

11 CHOICE, *Pet food regulation*, <https://www.choice.com.au/outdoor/pets/products/articles/pet-food-regulation> (accessed 10 July 2018).

12 Standing Council on Primary Industries Pet Food Controls Working Group, *Managing the Safety of Domestically Produced Pet Meat, and Imported and Domestically Produced Pet Food*, January 2012, p. 10.

1.26 The *Biosecurity Act 2015* requires the Department of Agriculture and Water Resources (DAWR) to regulate pet food that is imported into Australia.¹³ This responsibility is limited to the management of biosecurity risks associated with imported products. In addition, DAWR is responsible for providing certification to pet food products destined for export in accordance with the *Export Control Act 1982*.

Pet Food Controls Working Group 2009 – 2012

1.27 In May 2009 – following a number of pet food safety incidents in 2008 and 2009 – a Pet Food Controls Working Group (PFCWG) was established by the Primary Industries Ministerial Council (now Agriculture Ministers' Forum). The Working Group was tasked with examining the need for additional mechanisms to manage the safety of imported and domestically produced pet meat and pet food. The terms of reference of the working group were subsequently extended to allow it to consider the Australian Standard (AS5812:2011).

1.28 Chaired by the then Department of Agriculture, Fisheries and Forestry (now Department of Agriculture and Water Resources), the PFCWG comprised the NSW Department of Primary Industries, the Victorian Department of Primary Industries, Safe Food Production Queensland, the Australian Veterinary Association (AVA); RSPCA Australia, and the PFIAA.

1.29 The PFCWG considered three options to manage the safety of imported and domestically produced pet food in Australia – self regulation, co-regulation and comprehensive regulation. To inform its deliberations, it requested that the Australian Bureau of Agricultural and Resource Economics and Sciences (ABARES) undertake an economic assessment of the different policy options for managing the safety of imported and domestically produced pet food.

1.30 The PFCWG considered the nature and management of pet food safety incidents that had taken place over previous years and determined that, with the exception of one matter, it was unlikely that regulation would have prevented these incidents and that there had not been a true market failure. It noted, however, that the scale of the pet food safety incidents could have been reduced with 'better reporting and response arrangements'. On the basis of its findings, the PFCWG held the view that there was no justification for new official oversight of pet food manufacturing.¹⁴ Its view was supported by the findings of the ABARES economic assessment which found that:

...self-regulation is the preferred approach to industry-specific consumer protection to avoid unnecessary regulatory burden on business and the community more broadly...

13 Department of Agriculture and Water Resources, *Submission 31*, p. 2.

14 Standing Council on Primary Industries Pet Food Controls Working Group, *Managing the Safety of Domestically Produced Pet Meat, and Imported and Domestically Produced Pet Food*, January 2012, p. 16.

Self-regulation is a market response to information market failures and is likely to be the most cost-effective policy option to manage pet food safety in Australia for a number of reasons...¹⁵

1.31 However, the ABARES report cautioned that the 'critical issue' that would determine the success of a self-regulation approach would be the level of uptake to and compliance with the standard. It concluded:

If significant pet food safety issues arise in the future through, for example, inadequate compliance with the Australian Standard, there may be a need to consider cost-effective options to increase compliance. The preferred approach, at least initially, would be to encourage voluntary compliance with the Australian Standard. However, if this proves unsuccessful, there is always the option to reconsider a co-regulation approach where the Australian Standard is enforced by government.¹⁶

Development and review of the Australian Standard 2009 – 2017

1.32 Prior to the development and publication of the Australian Standard, the industry was guided by the *Code of Practice for the Manufacturing and Marketing of Pet Food* (the code). The code was developed and managed by the PFIAA.

1.33 In 2009, shortly after a government-initiated Pet Food Controls Working Group (PFCWG) was established, the PFIAA announced a commitment to update and replace the code with a comprehensive Australian Standard. The standard was developed in 2011 to provide an official standard for the production and supply of manufactured pet food for dogs and cats.¹⁷ It was developed by an industry-stakeholder working group established by Standards Australia following a public consultation process. The working group comprised representatives from the Department of Agriculture, RSPCA, AVA, PFIAA and the Victorian Department of Primary Industries.¹⁸

1.34 The Australian Standard was published on 10 March 2011 as AS5812:2011. It provides guidelines for the safe manufacture and marketing of pet food intended for consumption by domesticated cats and dogs.

1.35 In November 2017, the Australian Standard was reviewed and updated to ensure that it 'remains an appropriate and contemporary document guiding certified

15 Australian Bureau of Agricultural and Resource Economics and Sciences, *Pet food safety in Australia: economic assessment of policy options*, July 2012, pp. 20–21.

16 Australian Bureau of Agricultural and Resource Economics and Sciences, *Pet food safety in Australia: economic assessment of policy options*, July 2012, p. 22.

17 Pet Food Industry Association of Australia, *Submission 130*, p. 2.

18 Standing Council on Primary Industries Pet Food Controls Working Group, *Managing the Safety of Domestically Produced Pet Meat, and Imported and Domestically Produced Pet Food*, January 2012, p. 7.

companies in pet food manufacture and labelling'.¹⁹ The major changes made to the Australian Standard included reference to raw pet foods (as well as commercially processed) within the standard; reference to European pet food standards and upgrading labelling requirements to provide further relevant information for consumers and veterinarians.²⁰

1.36 Amongst these key changes to the Australian Standard was that of the incorporation of references to pet treats as well as pet meats. Prior to 2017, the *Standard for the Hygienic Production of Pet Meat* applied to pet meat alongside various state and territory legislation specific to pet meat, primarily aimed at ensuring that pet meat does not enter the human food chain.²¹ Developed in 2006, this standard details minimum hygiene requirements in the processing of animals used in the production of pet meat.

1.37 The PFCWG noted, in its 2012 report, that the pet meat standard was 'only implemented via regulation in some jurisdictions'.²² Furthermore, it noted that there was no pet meat industry body to implement its standard.

1.38 The incorporation of pet meat into the Australian Standard in November 2017, was recognised as an important step toward aligning Australia's standards with international standards. The alignment had been suggested by bodies, including the AVA, which noted in its advice to the PFCWG in 2012, that such an alignment would 'provide improved products for feeding of dogs and cats in Australia and have a very positive impact on food safety for dogs and cats'.²³

Requirements under the Australian Standard

1.39 The Australian Standard specifies requirements for the production and supply of manufactured food for domesticated dogs and cats:

This Standard covers production of pet food, including pet meat from sourcing and receipt of ingredients to storage, processing (including heat treatment), packaging, labelling and storage of production in order to assure

19 Pet Food Industry Association of Australia, *Submission 130*, p. 7.

20 Pet Food Industry Association of Australia, *Submission 130*, p. 7.

21 Standing Council on Primary Industries Pet Food Controls Working Group, *Managing the Safety of Domestically Produced Pet Meat, and Imported and Domestically Produced Pet Food*, January 2012, p. 4

22 Standing Council on Primary Industries Pet Food Controls Working Group, *Managing the Safety of Domestically Produced Pet Meat, and Imported and Domestically Produced Pet Food*, January 2012, p. 4.

23 Australian Veterinarian Association, Enclosure 9 to the PIMC Food Controls Working Group Report, p. 4, <http://www.agriculture.gov.au/SiteCollectionDocuments/animal-plant/animal-health/pet-food-safety/enclosure-9.pdf> (accessed 19 September 2018).

its safety for pets. It also includes instructions for the uniform application of information provided on labels.²⁴

1.40 The Australian Standard is focused on 'the safety of multi-ingredient, manufactured food for feeding to pets', as well as ensuring that products are 'accurately labelled and do not mislead purchasers'.²⁵ It details requirements for management and production practices at pet food manufacturing establishments to ensure the safe production of pet food, including, a quality assurance system.

1.41 A brief overview of the Australian Standard, and the requirements for manufacturing, labelling, marketing and nutrition, is outlined below.

Manufacturing

1.42 The first section of the Australian Standard provides instruction on the management and production practices of pet food manufacturing establishments. Manufacturing establishments are required to have a documented quality assurance system and a Hazard Analysis Critical Control Point (HACCP) plan as per the principles set out by the Codex Alimentarius Commission.²⁶

1.43 The Australian Standard also specifies the requirements for building and construction to ensure that the premises where pet food is manufactured, and the equipment used to produce it, are safe, hygienic and free from contamination. Guidelines are set out for plant and equipment, cleaning and sanitising practices, pest control, sampling and testing, record keeping, and product tracing and recall practices.

1.44 With regard to ingredients, pet food manufacturers must ensure that all raw materials used in pet foods comply 'with the relevant Australian regulations'.²⁷ Additional information about pet food ingredients is available from the PFIAA, and includes adherence to the APVMA's Maximum Residue Limits (MRL), and the National Feed Standard (NFS).²⁸

24 Standards Australia, *Australian Standard for the Manufacturing and Marketing of Pet Food (AS5812:2017)*, September 2017, p. 4.

25 Standards Australia, *Australian Standard for the Manufacturing and Marketing of Pet Food (AS5812:2017)*, September 2017, p. 4.

26 The Codex Alimentarius Commission (CAC) is an intergovernmental body that was established by the United Nations Food and Agriculture Organization and the World Health Organisation through the Food Standards Programme. The Commission's purpose is to protect the health of consumers and ensure fair practices in the food trade. Food and Agriculture Organization of the United Nations, *About Codex Alimentarius*, <http://www.fao.org/fao-who-codexalimentarius/about-codex/en/#c453333> (accessed 20 July 2018).

27 Standards Australia, *Australian Standard for the Manufacturing and Marketing of Pet Food (AS5812:2017)*, September 2017, p. 12.

28 Pet Food Industry Association of Australia, *AS5812 Purchasing Guidelines*, <https://www.pfiaa.com.au/TechnicalInfo/AS5812-Purchasing-Guidelines.aspx> (accessed 6 September 2018).

1.45 The sourcing and purchasing of raw materials must also be documented, and storage areas must be maintained to minimise the risk of damage, contamination, and unintended mixing or deterioration of ingredients or packaging materials.²⁹

1.46 The Australian Standard provides further guidance on the heat treatment and process control of pet food. It states that where temperature control is critical to product safety and quality, temperatures must be controlled, monitored and recorded. Process controls should have identified parameters relating to the use of additives, adjustment of pH, water activity, commercial sterility, and the use of mould-growth inhibitors. Processes and procedures for the storage and handling of chilled and frozen ingredients should also be in place. All processes should be clearly identified in the HACCP plan.

Labelling

1.47 The nutritional requirements of the Australian Standard dictate that pet food should follow the guidelines provided for in an international nutritional publication such as the Association of American Feed Control Officials (AAFCO) Official Publication or the FEDIAF (European pet food association) Nutritional Guidelines. The development of these publications is considered in the following chapter.

1.48 Labels should include an accurate description of the style, flavour or purpose of the pet food and should list all major ingredients and additive classes, with percentages included. For the purpose of naming, 'meat' signifies any part of an animal, other than feathers, which contains protein, and is ordinarily used in a food by dogs or cats, whether fresh, chilled, frozen or dried. The standard also provides details about the percentage of meat required in the food before a product can be labelled as a variety of meat, a meal containing meat, a product with meat components, or a product with meat flavour. Similar requirements apply across hermetically sealed or retorted pet food, wet pet food, and dry pet food. These labelling thresholds are detailed in the standard.³⁰

1.49 Labelling requirements provided in AS5812:2017 also detail the manner in which pet food should be identified. Packaged pet food must be marked with an illustration of the whole of the body, or the head, of a dog or cat, with the words 'PET FOOD ONLY' clearly displayed in legible print.

1.50 Nutritional information should be presented in a nutritional information panel on the packaging, with a statement of guaranteed or typical/average composition. A measurement of metabolisable energy, as required by international nutritional

29 Standards Australia, *Australian Standard for the Manufacturing and Marketing of Pet Food (AS5812:2017)*, September 2017, p. 12.

30 Standards Australia, *Australian Standard for the Manufacturing and Marketing of Pet Food (AS5812:2017)*, September 2017, pp. 19–22.

publications, should also be included. The stated composition of ingredients should be validated by a regular sampling and testing program.

1.51 The standard requires that the packaging display a statement of ingredients, presented in an informative and consumer-friendly manner. This includes food additives, which should be listed in accordance with the applicable Food Standards Australia New Zealand (FSANZ) Food Standards Code number, or by a specified class name.

1.52 Noting the importation requirements on certain pet foods, dog food that is irradiated should be labelled as such, with the inclusion of a warning that the food 'must not be fed to cats'. Any cat food or food intended for both cats and dogs must not be irradiated.³¹

Marketing

1.53 This section of the standard requires that advertising does not contradict or negate any information that appears on the labelling of a product. Generally, marketing should not be misleading, misrepresentative or disparaging of competitors' products.³²

Nutrition

1.54 To adhere to the Australian Standard, pet food manufacturers must ensure that their pet food products comply with the recommended nutritive requirements set out in an international nutritional publication such as the AAFCO Official Publication or the FEDIAF Nutritional Guidelines. The pet food must be labelled as 'nutritionally complete', and products that are designed for a specific life stage should have labelling that clearly states its purpose. Examples include: 'nutritionally complete for the maintenance of adult dogs', or 'nutritionally complete pet food for growing kittens'.

1.55 Foods that do not meet the minimum recommended nutritive requirements for cats or dogs, as defined by an international nutritional publication, should be labelled as 'intended for occasional or supplemental feeding'. The label should clearly state that the food is 'not nutritionally complete', or is intended as a 'supplement', 'complementary food', 'snack' or 'treat'.³³

1.56 Where the food is intended for therapeutic or dietary purposes, the product must comply with the provisions of the Agricultural and Veterinary Chemicals Code Regulations 1995. All therapeutic pet foods classified as excluded nutritional or

31 Standards Australia, *Australian Standard for the Manufacturing and Marketing of Pet Food (AS5812:2017)*, September 2017, p. 24.

32 Standards Australia, *Australian Standard for the Manufacturing and Marketing of Pet Food (AS5812:2017)*, September 2017, pp. 24–25.

33 Standards Australia, *Australian Standard for the Manufacturing and Marketing of Pet Food (AS5812:2017)*, September 2017, p. 26.

digestive products must be labelled with advice that a veterinary opinion be sought before introducing the product to an animal. Therapeutic pet foods deemed veterinary chemicals must first be registered with the APVMA before being eligible for sale.³⁴

Adherence to the Australian Standard

1.57 While adherence to the Australian Standard is voluntary for PFIAA members, compliance is strongly encouraged. The PFIAA indicated that the Australian Standard has been widely adopted by its manufacturing members and that estimates suggest that more than 95 per cent by volume of manufactured pet food sold in Australia is supplied by PFIAA members.³⁵ Put differently, PFIAA member companies, all of which adhere to the Australian Standard, provide an estimated 95 per cent or more prepared pet food sold in Australia.

Recent developments

1.58 On 7 May 2018, the Minister for Agriculture and Water Resources, the Hon David Littleproud MP, wrote to states and territories asking them to support an independent review into the safety and regulation of pet food.³⁶ Noting a need to reconsider how the pet food industry operates, Minister Littleproud indicated that three states had voiced their support for such review.

1.59 The committee received updated information at a public hearing on 29 August 2018 that all state and territory governments had since provided their support for the review, and that DAWR is in the process of establishing a working group to undertake the review. Potential members of the working group include the AVA, the PFIAA, RSPCA Australia as well as the Animal Health Committee (AHC).³⁷

1.60 To give further context to these recent developments, the next chapter will discuss a series of pet food safety incidents that have occurred locally and overseas. In particular, the spate of megaesophagus cases in dogs throughout 2017–18 is considered. The megaesophagus cases were consistently referred to in evidence to the committee; to highlight the shortcomings of the current system, and the need to consider enhanced safety and integrity measures.

34 Standards Australia, *Australian Standard for the Manufacturing and Marketing of Pet Food (AS5812:2017)*, September 2017, p. 27.

35 Pet Food Industry Association of Australia, *Submission 130*, p. 2.

36 The Hon David Littleproud MP, Minister for Agriculture and Water Resources, 'Littleproud welcomes pet food inquiry', *Media Release*, 20 June 2018. Also see: Angelique Donnellan, 'Having a pet die is an absolutely terrible thing': Senate announces inquiry into pet food industry', *ABC News*, 20 June 2018, <http://www.abc.net.au/news/2018-06-20/inquiry-to-be-held-into-pet-food-industry/9890398> (accessed 3 September 2018).

37 Dr Robyn Martin, Department of Agriculture and Water Resources, *Committee Hansard*, 29 August 2018, pp. 50–51.