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Submission from PFIAA Inc. to Australian parliamentary inquiry of pet food safety.

Pet health is of critical importance and PFIAA members understand the importance of companion animal health and the trust that owners place in them as pet food manufacturers to produce high quality, nutritious, palatable and safe pet foods. The PFIAA welcomes this inquiry into pet food safety to consider current regulatory arrangements and oversight and to consider opportunities to enhance the safety and integrity of domestically sold commercial pet foods in Australia.

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PFIAA inc.

INQUIRY INTO THE REGULATORY APPROACHES TO ENSURE THE SAFETY OF PET FOOD

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EXECUTIVE SUMMARY

Pet health is of critical importance and PFIAA members understand the importance of companion animal health and the trust that owners place in them as pet food manufacturers to produce high quality, nutritious, palatable and safe pet foods. In light of recent publicised quality issues, the PFIAA supports the review of current pet food manufacturing and marketing regulations to explore opportunities to enhance the safety and integrity of commercial pet foods sold in Australia.

The Australian Standard AS5812 was developed in 2011 by representatives from federal and state government, the Royal Society for the Prevention of Cruelty to Animals (RSPCA), the Australian Veterinary Association (AVA) and PFIAA, with support of Standards Australia to provide an official Australian standard for the production and supply of manufactured pet food for dogs and cats. This standard addresses management of raw material selection and handling, factory management, product formulation, process monitoring and control and labelling consistency of finished pet foods to ensure product quality and integrity. This standard was revised and improved as recently as November 2017.

While AS5812 is currently a voluntary standard, the standard has been widely adopted by manufacturing members of the PFIAA and it is estimated that more than 95% by volume of manufactured pet food sold in Australia is supplied by members of the PFIAA.

The PFIAA strongly supports the continued use of AS5812 as the standard for the production and supply of domestic and imported pet foods sold in Australia. In addition the PFIAA makes the following key points and recommendations:

1. The PFIAA is in the process of developing and implementing revised processes to the audit and documentation management for accreditation to AS5812 , in conjunction with a national ‘not for profit’ audit company. When implemented this process has the potential to enhance the integrity of the accreditation process.
2. The PFIAA currently publishes a list of members and facilities certified to AS5812 on its website. A funded public awareness campaign could assist in increasing public awareness of the Standard and availability of information about commercial pet foods that are compliant with the Standard.



3. PFIAA supports a thorough assessment of the potential benefits and viability of moving to a 'co-regulation' approach, which is envisaged to make certification to the Australian Standard a mandatory requirement for companies engaged in the manufacture and marketing of both processed and unprocessed food for pets in Australia. The PFIAA recognises that this is a complex issue and any assessment should involve representatives from both government and key stakeholders including the PFIAA, AVA and RSPCA. In this submission, unless expressly stated, pet food will include all types of food products available to pets.

THE AUSTRALIAN PET FOOD INDUSTRY:

AN AUSTRALIAN MANUFACTURING SUCCESS.

Dogs remain Australia's most popular pet with an estimated 4.75 million dogs now kept by around 38% of Australian households. Cats are Australia's second most popular pet, with some 3.9 million being part of 29% of households. The majority of owners report that their pets are a 'member of the family', rather than simply a 'companion'. These Australian dogs and cats consume over 30 million meals a week and a very substantial proportion of these are produced by capable and reputable pet food manufacturers who are members of the Pet Food Industry Association of Australia (PFIAA) estimated to be making over 95% of the processed pet foods sold in Australia.

In total, Australian households are estimated to have spent \$3.76 billion on dog and cat foods (processed & unprocessed) in 2016. (*appendix 1*)

Pet food production is a successful and resilient Australian manufacturing industry with many large manufacturing locations in rural and regional Australia, including: Bathurst, Blayney, Inverell, Dubbo, Wodonga, Gold Coast as well as smaller manufacturing operations nationally.

Additionally, Australia exports substantial quantities and value of processed pet foods, with some A\$183 million exported in 2016, successfully competing in highly competitive global markets due to the value and quality of Australian made foods. (*appendix 1*)

Prepared pet foods manufactured and supplied by reputable pet food manufacturers come with a commitment of nutritional adequacy, quality and safety. Pet foods made by members of the Pet Food Industry Association of Australia offer a wide variety of foods to meet the needs of pets and pet owners across all life stages and lifestyles, which is why pet owners across Australia choose to feed commercially prepared pet foods as a major part of their pet's diet.

ABOUT THE PFIAA

The Pet Food Industry Association of Australia was established in September 1972. The mission of the Association is to promote standards of excellence in the development of the pet food industry through:

- consideration of the needs of pets and the community;
- active promotion of the benefits of responsible pet ownership; and



- promotion of prepared pet food as the preferred method of pet nutrition and reinforced through establishment and self-regulation of industry standards.

The membership of the PFIAA includes manufacturing members (making products within Australia), marketing members (importing finished goods for sale in Australia) and Allied Industry members (engaged in supporting industries – e.g raw materials, packaging, analytical testing services etc).

Prepared pet foods - delivering complete and balanced nutrition for companion animals, pet treats and therapeutic diets

Dogs and cats need a balanced diet which contains appropriate amounts of protein, fat, carbohydrate and essential vitamins and minerals to meet their daily requirements for metabolism and activity. These nutrients must be present, not only in the correct amounts, but also in some cases in the correct proportion to each other to provide a nutritionally complete and balanced diet. Dogs and cats have quite substantially different nutritional needs and failure to deliver the specific nutritional requirements can lead to serious illness. Manufacturers of commercial foods must understand the requirements to provide the correct amount, balance and availability of nutrients to sustain physical and mental health and activity.

Like people, a pet's requirements for these nutrients varies throughout life and are determined by factors such as age, whether the pet is active or sedentary, state of the pet's health, reproduction, and environmental conditions. In meeting the particular needs of an individual animal, the owner must provide the required amount and correct balance of energy and essential nutrients in a quantity of food the pet will consume. Since animals eat to meet their energy (joules or calories) requirements, all essential nutrients must be present in the correct amounts relative to the energy in the food. Prepared pet foods that are complete and balanced will have a statement on their label advising this fact, usually referencing internationally recognized nutritional guidelines published by AAFCO (USA) or FEDIAF (Europe). (*appendix 2*).

REGULATIONS APPLICABLE TO PET FOODS IN AUSTRALIA

Adapted from enclosure 7: Summary of Regulation Specific for Pet Meat and Pet Food in Australia (*Attachment 3*)

Imported pet food regulation

All pet food imported into Australia must comply with the provisions of the Biosecurity Act 2015, administered by DAWR. Regulation of imported pet food is limited to quarantine issues.

The Imported Food Control Act 1992 regulates safety of imported food for human consumption but does not regulate food used for animal consumption.

Domestic pet food regulation

For regulation purposes, pet food may be separated into:



- pet meat, either fresh or frozen. It includes pet meat that is packaged for retail sale
- manufactured or processed pet food (including dry, chilled, baked and retorted cans, trays and pouches)

Regulation of pet foods in Australia currently includes the following:

1. Manufactured or Processed Pet Food Safety

Prior to 2011, The Pet Food Industry Association of Australia Inc. (PFIAA) managed its Code of Practice for the Manufacturing & Marketing of Pet Food as a guide for pet food manufacturers. The Code was superseded by the development of the Australian Standard for the Manufacturing and Marketing of Pet Food, AS 5812-2011 (now revised and updated to AS5812-2017). This is currently voluntary for PFIAA members, but compliance is strongly encouraged.

It is estimated that approximately 95% + of prepared pet food (by volume) sold in Australia are made by members of the PFIAA. PFIAA provides an accreditation system for its members who demonstrate compliance to AS5812 by means of third party independent audits. Compliant members will be entitled to declare their certification and to be listed on the association website. The Federal Government Department of Agriculture and Water Resources recognizes AS5812 certification through a Letter of Exchange signed by DAWR and PFIAA annually. This agreement of the certification system is audited annually by DAWR compliance integrity unit to ensure adequacy for export registration for many overseas markets.

2. Pet Meat Safety

The Primary Industries Standing Committee Technical Report 88 (PISC 88)– Amended 2009 Standard for the Hygienic Production of Pet Meat (previously Australian Standard 4841:2006) was developed in 2006 to establish minimum hygiene requirements in the processing of all animals used in the production of pet meat. However, it is not translated legislatively in all the states with most states and territories prohibiting the processing of pet meat from carcasses sourced from unhealthy animals.

The latest revision of the Australian Standard for the Manufacturing and Marketing of Pet Food, AS 5812-2017 was updated to be more encompassing and has included reference to raw pet foods and pet meat.

3. Labelling

Pet food, including pet meat and pet meat product labelling requirements are regulated in some jurisdictions, but apart from Queensland, there is no provision on requiring manufacturers to state actual ingredients or methods of processing. Pet meat is required to label additive codes according to PISC 88.

The Australian Standard for the Manufacturing and Marketing of Pet Food (AS 5812:2017) provides detailed guidelines for product labelling which is discussed later in this report – see “label requirements under AS5812”.



SAFETY OF COMMERCIAL PET FOODS

PFIAA members recognise that the safety of prepared pet foods is paramount. No food producing company should ever become complacent about food safety and this applies to the prepared pet food industry as well. Making nutritious and safe pet foods involves following the same principles that are adopted in preparing many commercial foods for humans, often using similar processes, technology and equipment. Good food relies on quality, fresh ingredients, hygienic processing and appropriate storage of food throughout the production process.

Production facilities, raw materials, processing and preservatives

Processing pet foods to reduce the risk of spoilage and to extend shelf life is an important part of making good quality, safe pet foods. Most prepared pet foods, including: cans, trays or sachets, dry foods and 'pet rolls' achieve this primarily by undergoing various forms of cooking and/or drying to greatly reduce the risk of microbial contamination and enable the finished product to have an extended shelf life.

Pet foods that are subjected to high temperature processing and then packed into airtight packaging, such as cans, alutrays and foil sachets are commercially sterile, meaning that there are no surviving bacteria present. These types of foods usually have a long "shelf life" or "best before" date and do not require additional preservatives to be added during processing. Under AS5812, it is required to have Hazard Analysis and Critical Control Points (HACCP) plans in place to address critical control point management.

It is important that retailers and pet owners store all pet foods correctly to avoid spoilage and to feed the pet food within the stated "best before" date on the packaging.

THE AUSTRALIAN STANDARD FOR MANUFACTURING AND MARKETING OF PET FOOD (AS5812 - 'THE STANDARD')

The Australian standard (AS5812) 'Manufacturing and marketing of pet food' specifies requirements for the production and supply of manufactured pet foods for cats and dogs. The Standard applies to both Australian made and imported pet foods and covers production of pet food from sourcing and receipt of ingredients to storage, processing (including heat treatment), packing, labelling and storage of products in order to assure its safety for pets.

PFIAA member companies provide and estimated 95% or more of prepared pet foods sold in Australia and these companies have committed to implementation of the Australian Standard, providing added confidence to pet owners about the facilities, safety, ingredients and processing used in making pet foods. The PFIAA is the certifying authority and operates arrangements under an annual contract 'Letter of Exchange (LOE)' with the Department of Agriculture and Water Resources (DAWR).



The Pet Food Industry Association of Australia Inc. (PFIAA) has for many years been working closely with the Australian government's Department of Agriculture and Water Resources (DAWR) and highly capable professional associations and organisations including: the Australian Veterinary Association (AVA), the Royal Society for the Prevention of Cruelty to Animals (RSPCA) and Standards Australia over many years to collaboratively developed and implement 'the Australian standard (AS 5812): Manufacturing and marketing of pet food.' First published in 2011, this Standard has been most recently reviewed and revised by the representatives from the contributing author organisations in November 2017 to ensure that it remains an appropriate and contemporary document guiding certified companies in pet food manufacture and labelling. Major revisions implemented in November 2017 included referencing raw pet foods (as well as commercially processed) within the standard, referencing European pet food standards and upgrading label requirements to provide further relevant information for consumers and veterinarians, particularly relating to carbohydrate inclusion. The PFIAA agrees with and supports these revisions to ensure a more comprehensive document and application across the Australian pet food industry, increasingly reflecting and aligned with global standards of quality and operations within the pet food industry.

The confidence that Australian pet owners have in prepared pet foods is well placed as the quality and safety of prepared pet foods made and marketed by PFIAA members is world-class, which is borne out by the success that these manufacturers have achieved in highly competitive export markets including USA, Asia, and the European Union. This is largely due to the raw material and ingredients, manufacturing capabilities and quality systems of member companies.

The certification process and responsibilities are detailed in Appendix 3. The AS5812 certification process operated by the PFIAA is assessed through an annual audit conducted by the Department of Agriculture and Water Resources and the most recent operational audit was completed in late June 2018.



AS5812 provides an agreed, consistent and transparent approach to the industry's operations to provide confidence in our large and internationally competitive pet food industry. The standard provides an internationally-aligned consistent approach to nutritional integrity of foods (referencing the internationally recognised AAFCO and FEDIAF nutritional guidelines and feeding protocols for dogs and cats) and the standard also provides detailed labelling and manufacturing quality standards that are applicable to the making and marketing of commercially prepared pet foods. All the major manufacturers of prepared pet foods in Australia have been subject to independent audits and are now compliant with the Australian Standard AS5812. 'The AS5812 certified logo' shown here is a trademarked image that PFIAA members, who have gained certification to the Australian Standard, are able to and encouraged to include on packaging and other consumer-facing communications.

As at July 2018 some 37 manufacturing sites operated by PFIAA members within Australia and one in South East Asia are accredited to AS5812.



Label requirements under AS5812

Section 3 of the Standard provides requirements regarding AS5812 compliance re labelling, marketing and nutrition. The labelling guidance in AS 5812 has been developed to ensure that consumers receive relevant and accurate information about the pet food including compliance with all regulatory requirements. This section prescribes requirements such as:

- Direction re variety identification for different pet food formats – dry, canned, treats, retorted, chilled etc (3.1.1-3.1.4)
- Identification as pet food (3.1.5)
- Nutrition information requirements (3.1.6)
- Directions for use (3.1.7)
- Date labelling (3.1.8)
- Ingredient listing (3.1.10)
- Notice of irradiation – if undertaken (3.1.11) – including advice that cat foods shall not be irradiated and mandatory labelling of irradiated dog foods.

Nutrition requirements under AS5812

Section 3.3 of the Standard addresses nutritional requirements for cat and dog foods. This section states that: 'Pet food shall be of a nutritional standard adequate to confirm with the prerequisites of the description in implied and explicit advertising claims.' The subsections include:

Nutritionally complete pet food – definition (3.3.2)

This clause advises that 'a pet food that is nutritionally complete shall conform with the recommended nutritive requirements for cats or dogs in accordance with the INP' 'INP' refers to 'International Nutritional Publication' which includes both the companion animal nutrition requirements documentation published by European and the American reference bodies (*appendix 2*).

DEVELOPMENT AND IMPLEMENTATION OF PETFAST ON-LINE REPORTING TOOL

PetFAST is a joint initiative of the Australian Veterinary Association (AVA) and the Pet Food Industry Association of Australia (PFIAA) for use by veterinarians, who submit online veterinary case reports on particular cases where they believe that as a result of the case history, presenting clinical signs and/or pathology test results, they believe that the clinical signs might be associated with consumption of commercial pet foods. Supplied information is immediately available and monitored by AVA and PFIAA for any similarities that might indicate a broader problem with pet food available in Australia. The system was set-up so that prompt action can be taken to protect pets. The system was amongst the first deployed worldwide to enable veterinarians to report and the AVA/PFIAA to monitor unusual, serious or unexpected pet health problems that are suspected to have significant connection with pet foods, treats or pet meat. The PetFAST service provides a



checklist to veterinarians to help them gather and provide appropriate and useful information when they suspect a health issue may have been related to pet food consumption. The PetFAST reporting tool has been operational since late 2012 and has proved to be a useful and efficient ‘early detection’ tool to alert both PFIAA and AVA to potential pet food related issues.

Appendix 4 and Attachment 1 provides examples of the PetFAST system in operation, showing promotion of the service in announcements posted on the PFIAA website and an example of a PetFAST report relating to development of megaesophagus in a dog submitted by a veterinary clinician earlier in 2018, received by the PFIAA and forwarded to Mars Petcare Australia for action.

OPPORTUNITIES TO ENHANCE THE SAFETY OF AUSTRALIAN PET FOODS

Management and government audit of the AS5812 certification program

Appendix 3 provides a table detailing actions and responsibilities in regards to current gaining and maintaining AS5812 certification. The PFIAA is the certifying authority for AS5812 and certified companies are required to ensure that audits are conducted by suitably credentialed, independent 3rd party auditors.

The PFIAA has recognized in early 2018 that the current system could be enhanced to increase the integrity of the audit process and documentation.

The PFIAA is currently implementing substantial changes in the management of the national AS5812 certification process of pet food companies through appointment of a nationally, highly experienced and widely recognized, not for profit audit company operating under internationally recognised Quality Management Systems: ISO 9001, with all auditors being Exemplar Global accredited and audit operations are JAS-ANZ accredited. The PFIAA anticipate this audit oversight to be implemented by late 2018.

Implementing AS5812 as a mandatory standard

The PFIAA recognizes and supports the assessment and potential benefits of regulations in regard to the Australian Standard AS5812-2017 being mandatory for companies engaged in the manufacture and marketing of pet foods (unprocessed and processed) sold in Australia.

The PFIAA recognizes that there are opportunities to improve both legislative frameworks and, perhaps more importantly enhanced regulation of existing frameworks for the benefit of Australia’s companion animals and their owners. Specific opportunities identified include:

Options for enhanced regulation of the Australian Pet Food industry have been previously considered and published in the Report of the Standing Council on Primary Industries (SCOPI) Pet Food Controls Working Group entitled: Managing the safety of domestically produced pet meat and imported and domestically produced pet food, published in January 2012. It is the opinion of the Pet



Food Industry Association's Executive Committee that this report is thorough and their published options for regulation of the industry remain valid. These are as follows:

Three main options were considered by the SCOPI Working Group and these included self-regulation, co-regulation and comprehensive regulation. The SCOPI report is attached to this submission (*attachment 1*)

Since the publication of the SCOPI report, the industry has implemented self regulation and adopted recommendations with regards to development and implementation of the Australian Standard (AS5812-2017) and PetFAST reporting system.

In light of recent events where companion animals have developed illness associated with consumption of commercially produced pet foods, the PFIAA recognizes that reassessment of the regulatory framework is appropriate and inline with the recommended review timing proposed by the committee.

The PFIAA supports an assessment of the benefits that might accrue from implementing the 'co-regulation' model proposed in the 2012 SCOPI report and believes that this may provide significant benefits in terms of industry oversight, audit consistency and uniformity of quality standards and importantly, including a prescribed requirement to have efficient product recall management systems in place. Sections 45 to 51 (see below) of the 2012 SCOPI report present a summary of a proposed 'co-regulation' model of industry regulation.



Co-regulation

45. Under this option, a Standard would still need to be developed as the basis for nationally consistent regulation for both domestically produced and imported pet food. The Standards Australia process which produced AS5812:2011 would seem a logical route to follow because of its rigour and stakeholder input. It would require industry commitment.
46. The Australian Standard would then need to be put to SCoPI for endorsement and commitment to regulate to the Standard in all jurisdictions. Relevant state/territory and Commonwealth requirements for justifiable, proportional and effective regulation would need to be met.
47. Implementing the relevant regulations in all jurisdictions and the Commonwealth, including regulating to the standard, any associated testing and the power to mandate product recalls, would take an extended period of time, possibly several years. It would allow regulation of imported pet food.
48. Verification of compliance with the Standard could be through a combination of official oversight of industry based third-party audit arrangements, and direct official audits of those manufacturers outside of industry schemes based on the Standard.
49. Animal foods that are to be exported would still remain as prescribed goods under the *Exports Control Act 1982* but exporters' verification and compliance could be carried out through third-party auditors or direct official oversight to underpin DAFF Biosecurity certification, where acceptable to importing country authorities.
50. Adverse event reporting, tracking and investigations programs would operate through a partnership between government, industry and the veterinary profession.
51. Procedures for recalling unsafe pet food would be part of manufacturer's quality systems, and would need to meet requirements of AS5812:2011 and the '*Standard for the Hygienic Production of Pet Meat*'. Official mechanisms would need to be created so as to enable the instituting of a pet food recall in the event a producer was considered to have failed in its duty.

FIGURE 1 SECTION OF 2012 'SCOPI' REPORT WITH CO-REGULATION CONSIDERATIONS

Mechanism for a government mandated (involuntary product recall).

The PFIAA considers that where sufficient clinical and epidemiological evidence exists such that it becomes evident that a pet food product recall should be implemented, then the company brand owner should rapidly implement a voluntary product recall to protect the health of Australian pets.

Currently the PFIAA understands that there is no provision within legislation for a mandatory recall of pet food to be implemented by government, in the event that a brand owner fails to initiate a voluntary recall (with the exception of therapeutic diets, as recall systems and Good Manufacturing Practice [GMP] requirements are already in place for these products under the provisions of the AgVet codes with the Australian Pesticides and Veterinary Medicines Authority [APVMA] being the regulatory authority). The PFIAA endorses the view that an appropriate Federal government



minister, Department head or regulatory body should have powers to announce an involuntary recall for any pet food sold in Australia, if a substantive risk of serious illness in companion animals has been identified and if the pet food brand owner chooses not to undertake a product recall.

Such a government-mandated recall would require consideration of the facts by an appropriately credentialed panel including veterinary expertise to make such a recommendation based on potential risks to companion animal health after consideration of available data. It is envisaged that implementation of such an initiative would be similar to the recall arrangements operating in the Australian (human) food industry or pharmaceutical industry. While the PFIAA would expect any perceived serious illness in pets that is considered likely associated with consumption of pet foods would result in the company responsible announcing a voluntary recall of such pet foods, as has occurred in past such events in Australia, we support the move to ensure that an appropriate mechanism is in place to enable a responsible government minister to announce and implement a mandatory recall.

Comparisons with international approaches to the regulation of pet food:

Attachment 2 provides a detailed review of major international market regulations applicable to pet food.

CONCLUSION

The PFIAA welcomes this inquiry into pet food safety to consider current regulatory arrangements and oversight and to consider opportunities to enhance the safety and integrity of commercial pet foods sold in Australia. Pet health is of critical importance and our members understand the trust that pet owners place in them as pet food manufacturers to produce high quality, nutritious, tasty and safe pet foods. The pet food industry has been working with key government and expert not for profit, non-government organisations to develop and more recently revise the Australian Standard (AS 5812): Manufacturing and marketing of pet food. The PFIAA supports initiatives to enhance pet food safety and believes that the existing resources of AS5812 and the jointly managed (PFIAA & AVA) 'PetFAST' early warning system are the foundations for enhanced quality management across the pet food industries.

APPENDICES & ATTACHMENTS:

- Appendix 1 Market value of Australian made pet food exports 2016
- Appendix 2 International Nutritional Publications (INP) – AAFCO & FEDIAF
- Appendix 3 Operation procedure & responsibilities- AS5812 certification process
- Appendix 4 Operation & examples of the PetFast early warning system

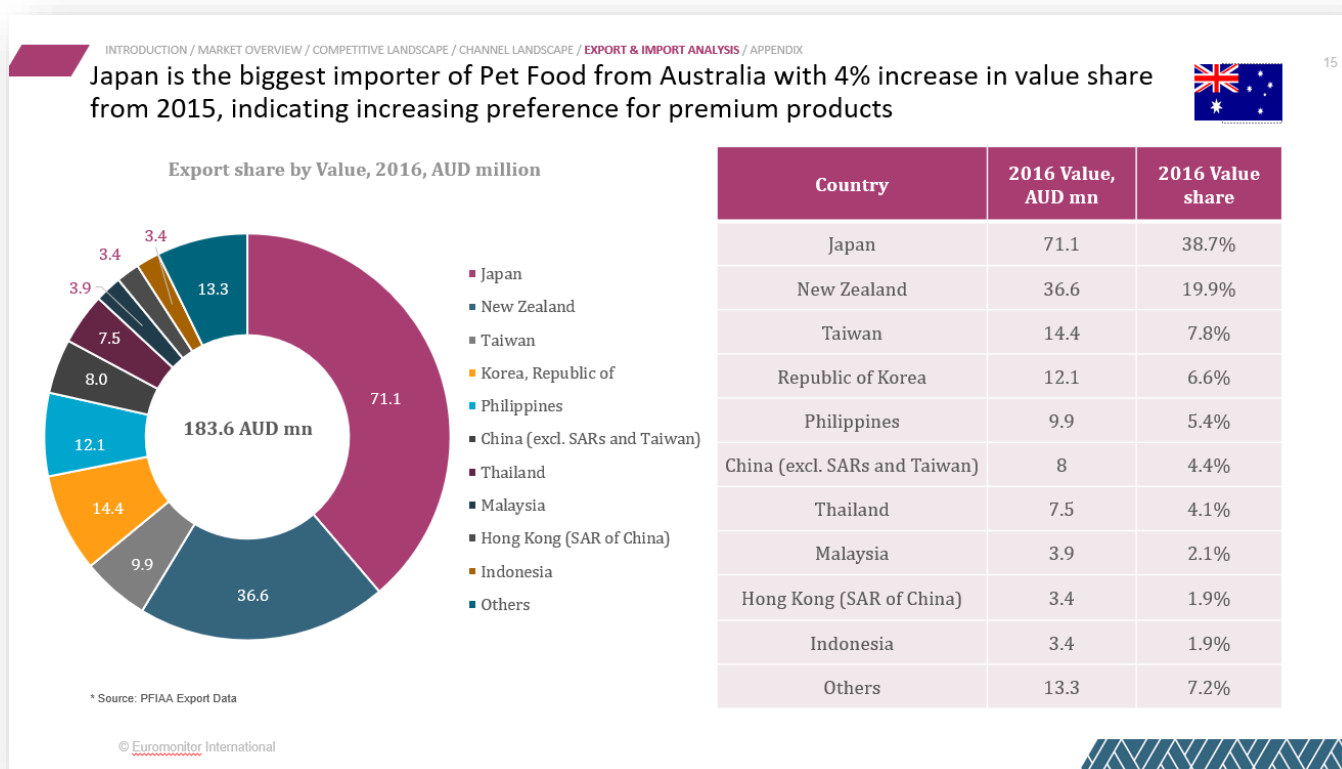


Attachment 1 A timeline of PFIAA /PetFAST response to the Mars Petcare Advance recall / megaloesophagus

Attachment 2 Major international market regulations applicable to pet food.

Attachment 3 Managing the safety of domestically produced pet meat and imported and domestically produced pet food, Report of the Standing Council on Primary Industries Pet Food Controls Working Group, 2012
(<http://www.agriculture.gov.au/SiteCollectionDocuments/animal-plant/animal-health/pet-food-safety/report-of-the-scopi-pet-food-controls-working-group.pdf>)

APPENDIX 1





APPENDIX 2

AAFCO & FEDIAF

internationally recognised companion animal nutrition organisations

Both AAFCO and FEDIAF are international organisations that are globally recognised as reference bodies in companion animal nutrition. Both AAFCO and FEDIAF assess research and scientific publications of companion animal nutrition and publish nutritional guidelines for the dietary requirements of cats and dogs. These guidelines are regularly reviewed and updated to provide the global pet food manufacturing industry with informed and current information to formulate and assess the nutritional adequacy of commercially produced pet foods. Both organisations are referenced in the Australian Standard AS5812-2017.

AAFCO - The Association of American Feed Control Officials

The following is from website: <http://www.aafco.org>

The Association of American Feed Control Officials (AAFCO) is a voluntary membership association of local, state and agencies within the United States of America charged by law to regulate the sale and distribution of animal feeds and animal drug remedies within USA.

Purpose and Function of AAFCO

AAFCO provides a forum for the membership and industry representation to achieve three main goals:

- Safeguarding the health of animals and humans
- Ensure consumer protection within USA
- Providing a level playing field of orderly commerce for the animal feed industry in USA.

These goals are achieved by developing and implementing uniform and equitable laws, regulations, standards, definitions and enforcement policies for regulating the manufacture, labeling, distribution and sale of animal feeds in USA.

Many commercially produced pet foods made by members of the PFIAA have a label statement of nutritional adequacy that references AAFCO. This often states "complete and balanced" in the nutritional adequacy statement and this means that a dog or cat food must either:

- Meet one of the Dog or Cat Food Nutrient Profiles established by the Association of American Feed Control Officials (AAFCO) or



- Validated through a feeding trial applying AAFCO procedures.

AAFCO publishes the nutrient profiles (requirements) for both dogs and cats annually in their official publication, which can be purchased through their website and this information is revised when new nutritional information becomes available. The profiles incorporate the most current information on good nutrition for dogs and cats and provide practical information for pet food manufacturers. For a product to meet one of the AAFCO nutrient profiles, it must contain every nutrient listed in the profile at the recommended level.

AAFCO also publishes model pet food regulations that provide detailed guidance about claims, label elements and product naming. As model regulations, these can be efficiently adopted by member states for labelling.

All the nutrients listed in each profile have a minimum level, and some also have a maximum level. Because nutritional requirements of both dogs and cats can change, dependent upon a range of factors including life stages, AAFCO established two nutrient profiles for both dogs and cats—one for growth and reproduction (which includes growing, pregnant, and nursing animals) and one for adult maintenance. A growing kitten or a dog feeding a litter of pups, for example, has different nutritional requirements than an older, spayed or neutered pet.

(source: www.aafco.org)

FEDIAF - THE EUROPEAN PET FOOD INDUSTRY FEDERATION

Adapted from website: <http://www.fediaf.org>

Established in 1970, FEDIAF is the industry association that represents the pet food industry in 21 European countries via 16 national or regional pet food industry associations before EU institutions and other international bodies.

It seeks to represent the views and interests of around 650 European pet food companies and seeks to inform and partner with EU institutions in legislative, political and technical aspects concerning the pet food industry for the production of safe, nutritious and palatable pet food


FEDIAF also supports and encourages the important social role of pets in society and the importance of responsible pet ownership.

FEDIAF operates within a co-regulatory framework with the European commission and member states. The nutritional guidelines and other standards published by FEDIAF are recognized by and enforced by the EU Commission (DG SANCO) and or member states of the E.U.



APPENDIX 3

Operating procedures & responsibilities for AS5812 certification

	Pet Food Industry Association of Australia Inc	Operating Procedure
Title: Dept of Ag & Water Resources- Letter of Exchange Export documentation		Version Date: 7 Dec 2017 (draft).

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Who	What	Details	Ref Document
PFIAA Member PFIAA Exec Mgr &/or Admin Officer	Audit Verification	Procedure to verify AS5812 audits, supplementary country audits and details required by DAWR for Export Register listing purposes	AS5812 Certificates DAWR-PFIAA LOE DAWR ABP form

Background:

PFIAA has a Letter of Exchange with Department of Agriculture & Water Resources which places designated obligations on PFIAA to manage audits and advise appropriate details when new establishments have completed requirements or have completed annual audits. This procedure has been developed to list the requirements and responsibilities.

Who	What	Details	Ref Document
PFIAA Member Exec Mgr	AS5812 Audit	Audit report completed and submitted to PFIAA Exec Mgr	AS5812 Audit Report
Exec Mgr	Verification	EM verifies that completed form has appropriate details, including notification of Certification recommendation by auditor	AS5812 Audit Report
Exec Mgr	AS5812 Certification	Complete or update AS 5812 certificate according to Audit report	AS5812 Certificate
Exec Mgr	New Certification	Email pdf copy of certificate to member with copy to DAWR-NPG (NPGexports@agriculture.gov.au) to verify new certification.	-AS5812 Member Certificate
PFIAA Member/Exec Mgr	New Certification	Request Member to complete ABP form and on receipt of completed form counter sign and send to NPG (NPGexports@agriculture.gov.au) and Export Establishment Register (Exportestablishment@agriculture.gov.au) requesting listing on the Export Register. Note member to list product type (eg retorted canned/tray/pouch, dry, chilled, treat etc) and countries required on ER listing (*EU, China, Sth Africa & Israel only are currently audited and can be verified by PFIAA via members auditor)	-DAWR ABP Application form
Exec Mgr	Renewal Certification	Email pdf copy of certificate to member with copy to DAWR-NPG (NPGexports@agriculture.gov.au) to verify renewal of certification.	AS5812 Member Certificate

Exec Mgr	Renewal certification	Only if there are any changes to members details, products or countries*, request a new ABP form from the member, counter-sign and send to NPG. (NPGexports@agriculture.gov.au) and Export Establishment Register (Exportestablishment@agriculture.gov.au)	-DAWR ABP Application form
PFIAA Member/Exec Mgr	Member <u>non</u> <u>compliances</u> , changes	LOE requires that significant changes to member audits or details are notified. Auditors must notify PFIAA immediately who then advise the Department of Agriculture of any Critical Noncompliance findings, failed audits, refusal to be audited or refusal to assist the Auditor. Auditors are to advise PFIAA within one day and PFIAA is to advise DAWR within a further day. A similar obligation (#see Auditor requirement document for more details)	-DAWR-PFIAA LOE -#DAWR-PFIAA LOE Auditor requirements
Exec Mgr	AS5812 register	PFIAA maintains a Certification register. Each successful audit is <u>noted</u> and the list update recorded. A pdf copy of the register showing only the member names and audit anniversary date is published on the PFIAA website as and when details change (www.pfiaa.com.au/TechnicalInfo/Members-Certified-to-the-Australian-Standard.aspx)	PFIAA AS5812 Register pdf version
PFIAA Member/Exec Mgr	Audit date change	Audits (completed and signed off- within non-conformance limits as specified in <u>auditor</u>) are due within 12 months +/- 2 months of the anniversary date (usually the initial audit or agreed revision). If unforeseen circumstances arise which preclude occurrence, application advising the reasons are made to PFIAA who then seek approval of DAWR-NPG Manager who may/may not approve the change <u>accordingly</u> . (# see section 8)	-#DAWR-PFIAA LOE Auditor requirements

Procedure approved

Date



APPENDIX 4

OPERATION OF 'PETFAST' REPORTING SYSTEM

FIGURE 2 PETFAST REPORTS FROM VETERINARY CLINICIANS ARE RECEIVED AND REVIEWED BY PFIAA & AVA
(EXCERPT OF REPORT BELOW)

From: PetFAST adverse event report <DoNotReply@ava.com.au>
Sent: Friday, 27 April 2018 6:05 PM
To: info@pfiaa.com.au
Subject: PetFAST adverse event report

Submitted on Friday, 27 April 2018
Submitted by anonymous user: [123 ██████████] Submitted values are:

--1. Veterinarian's details--
Veterinarian's name: Dr. ██████████
AVA member number or registration number: SA ██████████
Veterinary practice name: ██████████ Veterinary Clinic
Veterinary practice address: ██████████
Contact phone number: 08 ██████████
Alternative contact phone number:
Email contact address: ██████████ ██████████
Do you give permission for your contact details to be forwarded
to the product manufacturer where possible? Yes

--2. Patient details--
What's your suspected diagnosis (or diagnoses)? megaesophagus
Patient species: Dog
Breed: Dalmation
Name of patient: ██████████
Age of patient: 2
Age in years, months or weeks: Years
Sex of patient: NF
Bodyweight: 24.7
Date of examination/s: 06/04/2018
Main problems reported by owner: Vomiting
Clinical signs identified by veterinarian:
Regurgitation after eating.
occasional coughing.
Xrays confirmed megaesophagus on 27/04/18



Media Statement:

8 May 2017

Best Feline Friends (BFF) canned cat foods – Weruva product advice notice.

The Pet food industry association of Australia (PFIAA) is aware of a small number of reports of cats showing unusual neurological signs, involving altered posture and movement. The cause of these signs is not currently understood is currently being investigated by the Australian Veterinary Association.

National pet supplies retailer Petbarn, has issued a statement that canned cat foods under the 'Best Feline Friend (BFF)' brand have been removed from sale. Petbarn have added a notice titled: 'Weruva product advice' on their website and this is available here: [Weruva cat food product advice](#). PFIAA understand that BFF is currently the only brand affected by this action. Petbarn and the manufacturer, Weruva, are not members of the PFIAA .

The PFIAA is encouraging all veterinary practitioners to be vigilant if presented with cats showing signs similar to those reported in affected cats and to report any such cases by using the PetFAST reporting scheme. PetFAST (Pet Food Adverse Event System of Tracking) is a joint initiative of the AVA and Pet Food Industry Association of Australia (PFIAA) designed to assist in identifying and investigating such reported cases.

Duncan Hall Communications Officer
Mobile: 0402 696805

FIGURE 3 PFIAA PUBLIC NOTICE OF PRODUCT WITHDRAWAL OF BFF PET FOOD FOLLOWING REPORTS OF ILLNESS IN CATS 2017