



27 July 2018

Committee Secretary

Senate Standing Committees on Rural and Regional Affairs and Transport

Email: rrat.sen@aph.gov.au

To the Committee Secretary

RE: Regulatory approaches to ensure the safety of pet food

I write regarding the Senate Inquiry into regulatory approaches to ensure the safety of pet food. CHOICE appreciates the opportunity to provide feedback on this issue, as it is one that is dear to the hearts of many consumers who own pets. More than 13,000 people signed a CHOICE petition this month in support of improved pet food regulation, with thousands of those providing photos of their pets and detailed comments about why this issue is important to them.¹

Pets are an important part of their owners' lives and rely on us to be their carers. As a pet owner, we have [a] responsibility to ensure we look after our pets as best as we can. The very first, basic step is access to proper, good quality food. Our pets are living creatures. As a consumer, I have the right to access quality food for my pets - Cathy

We need this industry to be regulated. Our beautiful dog, Bailey, died as a result of megaesophagus. Unfortunately at the time of him falling ill, he had been eating Advance Dermocare. He was a healthy dog and it just makes me so angry that we lost our dog as a result of a poorly regulated industry - Amanda

¹ Petition numbers as at 27 July 2018. See Annexure 'Supporters of safe food for our pets' for the full list of people who signed the petition, and Annexure 'The heart of CHOICE's campaign for safer pet food: Pictures sent in by petition signers' for a selection of photos.

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It's essential that basic regulations are introduced to ensure the safety of pet food. We buy these (often very costly) products because we want the best & healthiest foods for our pets, however, it seems the only effort going into these foods is marketing. These brands need to take responsibility for their products - Naji

These are just a small sample of the comments we received. People tell us that they love their pets and want to do the right thing by them, however they do not trust that the food available on the market now is good enough.

When consumers buy any product in Australia, they should be able to trust that it is of acceptable quality and that they will be able to access a satisfactory remedy if not. However, this is not the case when it comes to pet food. There are no mandatory standards governing quality. If the product is faulty, you can rely on your consumer guarantee rights in the Australian Consumer Law to receive a remedy, including a refund. However, a refund for the cost of the faulty product is a manifestly inadequate remedy when your pet cat or dog has suffered a serious illness or worse. Pet owners don't want refunds for bad food, they want these products off the shelves.

In addition to the problems of quality and redress, there is a regulatory gap in relation to recalls. Pet food companies don't have the same incentives to conduct voluntary recalls as other businesses, and do not need to meet the same transparency and notification requirements. In relation to compulsory recalls, the gap widens - governments only have the power under consumer law to order compulsory recalls for products that cause harm to people, not animals.

Pet food regulation needs to change so that people can have confidence that the products they are buying for their pets are safe, and won't send them to the vet. Complaints processes need to be clearer and more accessible to pet owners, so that problems can be identified rapidly and transparently. When problems are identified, businesses should conduct recalls quickly and effectively. These regulatory issues can all be addressed, and have been addressed in other countries. This submission explains CHOICE's preferred approach and recommendations for reform.

Recommendation 1: rethinking pet food recalls

Pet food problems, particularly when these result or should result in recalls, are not properly captured by our existing consumer law framework. We need to fix these gaps in the current law. Pet food recalls should be conducted whenever pet food poses a risk to pets' health, but there is currently no real trigger for governments to order compulsory recalls, and there are insufficient incentives on businesses to conduct voluntary recalls. In addition to this, there are no reporting requirements for the rare instances when businesses do choose to conduct recalls, unlike there are for other unsafe consumer goods that are recalled.

Our recall system for general consumer goods is largely voluntary, with the State, Territory or Federal Governments able to order businesses to undertake recalls in certain circumstances. Under section 122 of the Australian Consumer Law, a compulsory recall can be ordered by the Minister responsible if the

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goods 'will or may cause injury to any person'. Alternatively, a compulsory recall can be ordered if a mandatory safety standard has not been met and it appears to the Minister that the suppliers of the goods have not taken 'satisfactory action to prevent those goods causing injury to any person'.

This leaves a significant gap for pet food. Generally, problems with pet food result in injuries to pets - not to 'persons' under the law. Consequently, even if a mandatory standard for pet food was introduced, it is unlikely that a compulsory recall could be ordered for a product that failed to meet the standard unless it also posed a threat to human health.

That leaves voluntary recalls as a mechanism for removing poor quality pet food from shops and homes. It is worth noting that most recalls of other unsafe consumer goods are voluntary, with only a very small number of compulsory recalls having been ordered. However, there are incentives in place that encourage businesses to recall consumer goods that may harm people. These same incentives do not exist, or are certainly not as strong, in relation to pet food. If a number of people are injured or killed by a product and the business fails to take appropriate steps to recall that product, that business could face very serious, costly court action. If pets are injured or killed by substandard pet food, the financial risk for a business is lower. A person could sue a pet food company for the cost of the poor quality food, and the cost of either their vet bills, if the pet became sick, or the market value of a new pet, if the pet died. This means that a business selling contaminated pet food may be less likely in all the circumstances to choose to conduct a voluntary recall than a business selling contaminated or dangerous food intended for people.

Looking at the market, it is clear that the incentives to conduct voluntary recalls of pet food are not strong enough. In Australia, we have had a very small number of pet food recalls in the past several years. When we compare this to the United States, the number is much higher. This is in part because the regulator, the US Food and Drug Administration (FDA), has the ability to either request or order a pet food company to conduct a recall. In 2018, there have been 26 pet food recalls listed on the FDA's website.² In Australia, it is difficult to determine exactly how many voluntary pet food recalls have taken place as there is no central authority that publishes information about these. Under Australian Consumer Law, businesses must notify the ACCC that they are undertaking a recall if the goods may cause injury to a person, or if they do not meet a mandatory standard. Faulty pet food would rarely fall under the first category, and currently can not fall under the second. A search of the ACCC product safety website reveals one pet food recall notification, a Whiskas cat food from 2013.³ Advance Dermocare dog food was recalled voluntarily in March this year and has been reported on in the media, but there is no central online location where information about voluntary pet food recalls is published. There is a lack of clear information, but it appears that the volume of recalls in Australia is much lower than in the US. We do not believe that this indicates the quality of food in Australia is higher, but rather that the regulatory regime is lax and the incentives to conduct voluntary recalls are not sufficient.

² As of 17 July 2018, see <https://www.fda.gov/AnimalVeterinary/SafetyHealth/RecallsWithdrawals/default.htm>.

³ Search conducted on 17 July 2018, see recall notice at <https://www.productsafety.gov.au/recall/whiskas-mars-petcare-australia-adult-aged-1-7-chicken-and-rabbit-flavour-dry-cat-food-1kg-box>, categorised under 'Home and Living - Pet Equipment'.

Given this, CHOICE recommends that an independent regulator be given the power to request or require businesses to run recalls of pet food if the regulator has reason to believe that the food could cause injury to any person or animal, or if it has failed to meet a mandatory standard or any voluntary standard that the business claims it meets. Businesses should also be obliged to notify the regulator when any action is taken to remove a pet food product from the market, and all pet food recall notifications should be published in a central location. Finally, strong penalties should apply for those businesses who do not comply with these requirements.

Recommendation 2: an independent body should regulate pet food

In some countries pet food is regulated as an agricultural product, and in others it's regulated by the regulator responsible for food. Pet food can have some crossover with food for human consumption, i.e. many pets are fed raw meat products that may also be eaten or used by humans in food preparation, such as chicken frames. In addition, pet food can impact on human health, for instance if the pet food is contaminated with something that may affect people, like mould. In the United States, the FDA is responsible for regulating food for both humans and pets. CHOICE supports a similar approach being taken in Australia. A new, independent pet food regulator could be created, but CHOICE would also support Food Standards Australia and New Zealand (FSANZ) being given this remit and associated powers as recommended above.

Our pets are like family members and we care about them. If we suspect pet food has made our pets sick, there should be a regulatory authority that we can notify. It may be necessary to warn the public about contaminated pet food and if necessary recall the food - Neil

Neil's comment above highlights a key concern for consumers - they want to be able to report problems to an authority. Any regulator responsible for pet food should have the power to take complaints from consumers, vets and other interested parties. The mechanism for receiving complaints should be clear and accessible. The FDA provides an example approach to complaints gathering via its Safety Reporting Portal.⁴

Currently, in Australia only vets can make official reports about problems with pet food to PetFAST.⁵ Consumers cannot make complaints through this system. Complaints are forwarded to the pet food manufacturer and there is no guarantee they will investigate or act. This leaves consumers feeling confused, angry and disenfranchised, as they do not have a clear pathway to making complaints themselves. Additionally, this means that one of the most valuable sources of complaints - pet owners noticing problems with the food they give their pets - is not being adequately utilised. A complaints system must incorporate consumers, and complaints should be collected and assessed by an independent regulator with the power to follow up and act on complaints.

⁴ 2017, US FDA, 'How to report a pet food problem' via <https://www.fda.gov/animalveterinary/safetyhealth/reportaproblem/ucm182403.htm>, page accessed on 19 July 2018.

⁵ 2018, Australian Veterinary Association, 'PetFAST - Pet Food Adverse Event System of Tracking' via <https://www.ava.com.au/petfast>, page accessed on 19 July 2018.

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Recommendation 3: pet food should be required to meet a mandatory standard

Finally, to support the other recommendations outlined above, pet food should be required to meet a mandatory standard. CHOICE recommends making the currently voluntary Australian Standard for the Manufacturing and Marketing of Pet Food, AS 5812:2017, mandatory. We also recommend that consumer testing is conducted to determine what information and labelling would be most useful for consumers, and incorporating those findings into the standard.

For my own food, I choose to buy Australian and will spend more to do so and to buy better quality. For my dog, I choose to buy food from the US and NZ and will spend more to do so and to buy better quality. I want to buy Australian dog food but when there are not enough protections around it, I don't know what to trust - Nicole

Nicole and other consumers made it clear when they contacted CHOICE - they do not trust that the food they are buying for their pets is good quality. These pet owners are aware that there are no mandatory standards for pet food, and their confidence in the market has suffered as a result. Making the voluntary standard mandatory would assist in restoring consumer confidence in the industry, while representing a very minimal additional regulatory burden. More than 98% of processed pet foods sold in Australia are produced by manufacturers who are members of the Pet Food Industry Association of Australia Inc (PFIAA).⁶ PFIAA members are encouraged to adhere to the voluntary standard, and those that do so would not need to make any changes in order to meet the requirements of the standard if it became mandatory. Those who are not complying with the voluntary standard are contributing to the current situation, where people are not able to trust that the food they buy for their pets meets any minimum standard. This change is necessary, and strongly supported by consumers.

For further information please contact CHOICE on sagar@choice.com.au

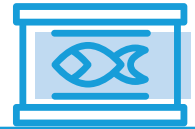
Yours sincerely,



Sarah Agar
Head of Campaigns and Policy

⁶ 2018, Pet Food Industry Association of Australia Inc., 'Safety, Labelling and Regulation of Pet Food' via <https://www.pfiaa.com.au/Feeding-Pets/Safety-Labelling-and-Regulation-of-Pet-Food.aspx> accessed on 19 July 2018.

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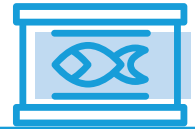
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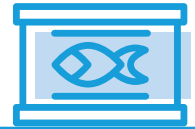
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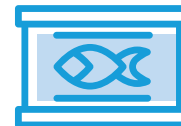
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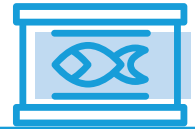
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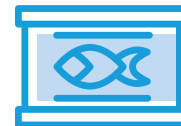
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Marianne
Terry
Karen
Cathy
Kaye
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Michelle
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Maria

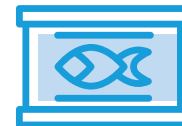
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Cheryl
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Fay
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Clare
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Les
Sharon
Yvonne
Tabitha
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Veronica
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Di
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Corinne
Kerrie
Amanda
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Narelle
Janette
Naomi
Libby
Jacqueline
Meredith
Tania
Deborah
Kathy
Gerri
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Joelle
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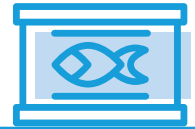
Margaret
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Ondine
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Zanthe
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Gillian
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Kathy
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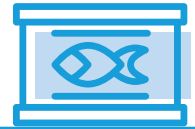
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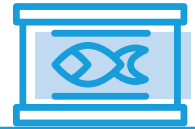
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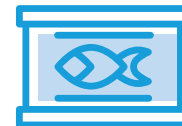
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Sue
Bronwyn
Mike
Sue
Shirley
Narelle
Robert
Ross
Tyla
Taylor
Yvonne
Fiona
Christopher
Chris
Glenn
Alex
Shae
Amy
Dillon
Catherine
Oscar
Helen
Katherine
Avril
Barry
Urvashi
Nigel
Patricia
Vanessa
Linda
Ruth
Jeannie
Stephanie
Lynette
Tracey
Marjan
Sharan
Gill
Rosie
Hayley
Rhys
Merryn
Vicky

Peter
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Patrick
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Sharon
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Cath
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Lance
Julie
Thomas
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Jeany
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Danielle
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Simone
Boris
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Lynette
Marnie
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Gaby
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Michelle
Paula
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Pj
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Rikki
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Beth
Roxy
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Sharee
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Julie
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Berilyn
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Denise
Michele
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Krystle
Sharon
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Dallas
Anne
Garry
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Kate
Wendy
Michelle
Roz



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Yvonne	Sue	Sue	Madison	Steve
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Merv
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Heli
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Glen
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Rachel
Jacquelyn
Natalie
Rachel
Leanne
Michael
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Lynette
Carrie
Debbie
Emily
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Angel
Diane
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Natalie
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Sandi
Sharyn
Phill
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Hugh
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Stanley
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Shirlene
Raphaella
Janae
Josie
Dianne
Shaun
Sharon

Caroline
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Ari
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Lauren
Graham
Fiona
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Odaria
Luis
Becki
Robyn
Hasmakhlal
Julie
Janet
Clara
Peter
John
Judy
Trish
Heather
Gillian
Matthew
Leah
Angela
Sandy
Rusalka
Andrew
Anna
David
Kristy
Danielle
Betty
Shelley
Martine
Jasmine
Fiorella
Megan
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Lisa
Lynda
Rory
Leah
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Davina
Ricki
Julia
Grant
Coco
Melinda
Rozanne



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Heidi
Christine
Marie-Claire
Anne
Katy
Ann
Karen
Jodie
Michael
Elizabeth
Sally
Kathy
Anita
Louise
Susan
Michelle
Margaret
Juli
Matthew
Sandy
Alissa
Felicity
Carmel
Kate
Gabrielle
Michelle
Dianne
Cheryl
Kat
Debbie
Jules
Rita
Kerry
Paul
Wendy
Peter
Sheila
Alicia
Sarah
Nerida
Elizabeth
Carolyn
Mary
Rachel
Susie
Sarah

Margaret
Marion
Michelle
Vaughn
Mark
Dimitrios
Marge
Jo
Desanka
Alan
Louise
Ken
Paul
Robert
James
Margaret
Anne
Mia
Tim
Garry
Rhana
Joseph
Andrew
Jess
Nigel
Amanda
Sara
Adam
Melinda
Tess
Tamika
James
Chris
Adam
Rachel
Jean
Kosta
Kris
Nicola
Berenice
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Bianca
Louise
Charles
Susan
Olesia
Val
Khee
Kelly
Christine
Junette
Scott
Pat
Tabetha

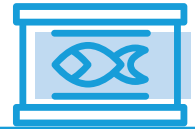
Samuel
Zorica
Diane
Paola
Bob
Stan
Rhiannon
Janine
Symantha
Jodi
Judd
Lisa
Nat
Lucy
Antonia
Alex
Sarah
Peita
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Kayla
Laura
Heidi
Melinda
Gretchen
Adrian
Jessica
Elizabeth
Rebecca
Morgan
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Rie
Kristen
Robyn
Leigh
Hayley
Casey
Chris
Jamisen
Peta
Lauren
Daniel
Stacy
Brooke
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Rebecca
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Shelly
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Justine
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Susan
Emma
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Jemma
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Bronwyn
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Travis
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Nathan
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Chitra
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Emma
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Karen
Nadine
Dawn
Cath
Gillian
Tatiana
Patricia
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James
Elly
Kate
Sandra
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Raymond
Janine
Janette
Julie
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Meg
Heath
Robin
Katherine
Cassie
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Lidia
Declan
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Dakota
Trevor
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Chloe
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Sandy
Ann
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Mary
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Jim
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Liesl
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Callum



The heart of CHOICE's campaign for safer pet food: Photos from our petition signers



