

The RSPCA Australia

RSPCA Australia considers companion animal nutrition to be one of the most important aspects of pet care. RSPCA Australia advocates the comprehensive regulation of the pet food and pet meat industries, both domestically produced and imported, along the entire supply chain to ensure products are safe for pets.

RSPCA Australia specifically advocates:

- The development of a formal independent adverse reporting system for pet food/pet meat.
- Reliable and accurate labeling information relating to ingredients, additives, complete and not-complete pet food/pet meat and treatments applied such as gamma irradiation for pet food/pet meat.
- Stringent and mandatory standards for pet food/pet meat to be established. Standards should be consistent and mandatory across all Australian states and territories and apply to all products sold for consumption by pets. Effective systems must be in place to ensure pet food/pet meat products are safe for pets.
- Safety controls over imported pet food/pet meat products to ensure products are safe for pets.
- A total ban on the irradiation of pet food/pet meat. Since late 2009, there has been a ban on the irradiation of imported cat food. The ban followed the 'Orijen cat' incidents and scientific evidence which showed an association between ingestion of irradiated imported cat food and severe neurological impairment, which in some cases was fatal. There is also a requirement that irradiated imported dog food be labelled 'must not be fed to cats'. A ban on the irradiation of all pet food should be implemented for a number of reasons. Despite label warnings, irradiated dog food may still present a serious risk to cats that ingest irradiated dog food particularly in a multi-species household. Some of the 'Orijen cats' only had access to irradiated dog food, not cat food. In addition, there may be as-yet-unidentified health effects on dogs following ingestion of irradiated dog food.
- Comprehensive regulation of the use sulphite preservatives in pet food/pet meat. There should be a legal requirement in all states/territories of Australia that where sulphur dioxide or sodium or potassium sulphites are used the common, prescribed, proprietary name or the FSANZ Food Standards Code number shall be included on the label. Where sulphur dioxide or sodium or potassium sulphites are used, to avoid acute thiamine deficiency in pets, sufficient thiamine shall be present throughout

the shelf life of a pet food product. If necessary this may be achieved by thiamine supplementation. Such supplementation may not of itself render the product nutritionally complete, but is to ensure the product is not deficient in thiamine according to AAFCO Official Publication guidelines in pet food/pet meat.

- PISC 88 Technical should be comprehensively reviewed to align it with AS5812:2011 in relation to sulphites and adequate thiamine including sections 3.1.10 and 3.3.3. Following these critical amendments to PISC 88, the revised PISC 88 should be legally adopted/applied in all states/territories of Australia. Note that there are no mechanisms available for a self-regulatory or other industry driven mechanism for the pet meat sector.