



Submission

Inquiry into regulatory approaches to ensure the safety of pet food

The Feed Ingredients and Additives Association of Australia (FIAAA), is the national peak industry organisation representing suppliers of feed ingredients and additives in Australia.

Feed ingredients are nutritive component parts or constituents of any combination or mixture making up a feed. Ingredients may be of plant or animal origin or other organic or inorganic substances. Feed additives are intentionally added components of feed not normally consumed as a feed ingredient, which affect the characteristics of feed or animals fed with it. They include a pre-mix which consists only of feed additive components, micro-organisms, enzymes, phytobiotics, acidity regulators, trace elements, vitamins, preservatives, colouring agents, binders, dust suppressants, carriers, flavours and other products.

The Feed Ingredients and Additives industry's products are critical to maintaining and improving Australia's livestock productivity and the health and welfare of pets.

The FIAAA was formed to:

- Advocate and promote the safe use of feed ingredients and additives
- Establish and manage a Code of Practice for use by feed ingredients and additives suppliers.

Regulatory approach

Earlier this decade the FIAAA and other stakeholders worked with the Department of Agriculture and Water Resources (DAWR) to address market failure in the industry. Australia is now recognized in the international feed ingredients and additives community for its world leading regulatory approach.

Since 2015, feed additives known as Excluded Nutritional and Digestive (END) Products are no longer required to be registered with the APVMA if they meet key criteria in the areas of use, labelling, ingredients, claims and manufacturing.

FIAAA has 48 members supplying feed ingredients and additives. In 2017 a survey of members revealed the following benefits of regulatory reform:

Savings in costs of APVMA registration	\$7.5M
Savings in company costs for APVMA submission preparing and facilitation	\$37.5M
Savings in annual APVMA Levies	\$2.5M
Savings in maintain registrations- annual fees	\$0.375M
Industry benefits from new products (efficiency)	\$35M
Total Industry benefits	\$82.875M

Prior to regulatory reform the cost and data requirements for APVMA product registration were considered insurmountable by many feed additive suppliers. So, although the regulatory reform moved to include industry self-regulation, compliance to the AgVet legislation has increased. At the same time the reform has enabled the APVMA to focus on more high-risk products.

FIAAA Code of Practice

The FIAAA Code of Practice¹ has an important role in the stewardship endeavours of FIAAA members. It is recognised that certification to the Code gives assurance of the quality of our members' products.

- **Compliance with the FIAAA Code of Practice** meets one of the key criteria for exclusion of END products from the requirement to be registered.
- **Feed ingredients in pet food:** The PFIAA Ingredient Purchasing Guidelines recommend adoption of industry codes such as the FIAAA Code of Practice. This Guideline is referenced in AS 5812:2017 Manufacturing and marketing of pet food.
- **Recall:** The FIAAA Code of Practice includes the requirement for a formal recall procedure that allows all stakeholders to be informed immediately of any irregularities that may compromise feed safety. It is a requirement that the recall procedure is regularly reviewed and tested at least annually to ensure functionality.

Flexibility and future benefits of regulatory reform

Industry self-regulation enables flexibility in response to international opportunities. FAMI-QS² is an internationally recognized feed quality system. Certification to this system may facilitate trade, with a consequential benefit to the Australian economy. With the flexibility of self-regulation, FIAAA has signed a memorandum of understanding with FAMI-QS, to be the contact point for the FIAAA/FAMI-QS scheme in Australia.

Ensuring success of regulatory reform

Self-regulation presents ongoing challenge as the industry lacks the powers of a regulator. The FIAAA, DAWR and APVMA have kept up dialogue to address the challenges. The FIAAA welcomes activities of the APVMA to ensure a high level of industry compliance.

A vital role of the FIAAA is to represent the industry to government, regulators and other stakeholders. It is not a requirement for feed ingredient and additives suppliers to be members of FIAAA. However maximum industry participation in the association is of benefit in ensuring a voice to stakeholders, including in: maintaining the value of regulatory reform already achieved; and, development of future regulatory initiatives.

PFIAA guidelines recommend adoption of the FIAAA Code of Practice, and the Stock Feed Manufacturers Council of Australia (SFMCA) automatically accepts FIAAA accredited suppliers as having completed the APVMA's requirements on suppliers for self-assessment.

It would be of benefit as an assurance of quality and safety if the FIAAA Code of Practice or FIAAA/FAMI-QS were required systems for feed ingredient and additive suppliers.

¹ Australian and New Zealand Code of Practice for Animal Feed Ingredient and Additive Suppliers, V5, Sept 2016

² <http://www.fami-qs.org/>

National Feed Standard – opportunity to strengthen the Code of Practice

DAWR is investigating the value of and pathways for implementation of a National Feed Standard.

The FIAAA would welcome such a standard to underpin their Code of Practice. While the industry does not want any unnecessary increase in regulation, a standard would be a means of addressing risks along the supply chain to both pet and human food.

It would be important for a National Feed Standard to first be implemented by the states and territories and subsequently adopted as a requirement for importation.

Pet food and livestock feed

Feed ingredients and additives are components of both pet food and stock feed. It is important to recognize the difference in pet and stock feed regarding risk and compliance: although animal welfare is important in both cases, the intended outcomes of feeding are different.

- Pet food is relied on to promote pet health and prolong life with diet.
- Stockfeed is generally targeted at productivity and unlike pet food, stock feed has the potential to impact human health. Most stock animals have a finite life which can be modified to address a feed event.

Issues that may be identified in regulation of pet food don't automatically apply to stock feed.

It is important also to consider that any change to regulation at a Federal level can be difficult to implement. States and Territories are responsible for control of use of agricultural chemicals, and do not automatically adopt model legislation.

Conclusion on regulatory approach

The FIAAA experience demonstrates that it is not necessary for regulation to be complicated. There may be benefit in strengthening self-regulation. Nevertheless, it is possible to address regulation and product recall for pet food without adding to regulatory burden.

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