

Terrestrial Animal Health Standards Commission
September 2009 Report
USA Comments

Chapter X.X

CONTROL OF HAZARDS OF ANIMAL AND PUBLIC HEALTH IMPORTANCE IN HEAT TREATED PET FOOD

General Comments and Observations

In July of 2009 the United States provided the OIE with a draft document on the safety of treated pet food for consideration. The Terrestrial Animal Health Standards (Code) Commission re-worked the document and entitled it “Control of Hazards of Animal and Public Health Importance in Heat Treated Pet Food” (Pet Food Chapter), and also tied it to an existing Code Chapter called “The Control of Hazards of Animal Health and Public Health Importance in Animal Feed”.

The United States supports a risk-based approach to facilitate the international trade of commercially produced pet food and is committed and encourages the use of sound science to develop standards and recommendations consistent with the principles and obligations of the TBT and SPS Agreements.

Accordingly, the United States feels the scope of a chapter covering the trade of heat-treated pet food should be limited to recommendations for SPS requirements for preventing the introduction of foreign animal diseases, including zoonotic diseases, into importing countries.

The suggested chapter, as proposed by OIE incorporates articles from Chapter 6.3 “The Control of Hazards of Animal Health and Public Health Importance in Animal Feed,” and expands the scope of the chapter beyond the prevention of introduction of foreign animal diseases through the international trade of pet food. As such, the United States is concerned that the proposed chapter for heat-treated pet food, as currently drafted, has the potential to lead to unnecessary regulatory restrictions which was not the original intent of the draft document.

The United States is concerned that linking the “pet food” chapter with the livestock and poultry feed chapter and expanding the scope of the chapter beyond appropriate recommendations regarding SPS concerns will cause some confusion and may impede trade. Pet food is manufactured using processes and procedures that are often very different than those used for livestock feeds. Furthermore, the purpose of pet food is not related to the feeding of food production animals and the risk for the introduction of foreign animal disease is not the same for livestock feed and pet food.

Therefore, the United States kindly requests that the proposed Pet Food Chapter be held by the Code Commission until the objectives, scope, and articles of the chapter are better defined and focused upon the prevention of the introduction of foreign animal disease through further consultation with the pet food industry.