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Manufacturing and marketing of pet food — Cats and dogs



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Consumers Federation of Australia
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Joint Accreditation System of Australia & New Zealand
NSW Food Authority
Pet Food Industry Association of Australia (PFIAA)
PrimeSafe Victoria

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Preface

This Standard was prepared by the Standards Australia Committee FT-033, Pet Food, to supersede AS 5812:2017.

The objective of this document is to provide requirements for the manufacture and marketing of pet food intended for consumption by domesticated cats and dogs. The focus of this document is on the safety of pet food and accurate labelling and marketing of products, so purchasers can make informed choices and are not misled.

The major changes in this edition are as follows:

- (a) Revision to address concerns raised in the Senate inquiry into regulatory approaches to ensure the safety of pet food (October 2018), and resultant report of the pet food review working group: Managing the health and safety of pet food in Australia (2021), aiming to —
 - (i) increase pet food quality and safety;
 - (ii) improve trust and transparency in the pet food industry.
- (b) Designating the scope of AS 5812 to pet food for domesticated cats and dogs.
- (c) Expansion of terms and definitions and consideration of new designs and innovations for future application.
- (d) Introduction of the concept of pet food authenticity.
- (e) Revision of labelling section, including variety naming clauses, to remove ambiguity and improve transparency in labelling.
- (f) Addition of detail relating to product tracing and recall.
- (g) General revision and re-formatting to improve usability for pet food businesses and clarity for auditing purposes. Some clauses modified from best practice recommendations to requirements, indicated by a change of wording from “should” to “shall”.

The term “informative” is used in Standards to define the application of the appendices to which it applies. An “informative” appendix is only for information and guidance.

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Australian Standard®

Manufacturing and marketing of pet food — Cats and dogs

1 Scope and general

1.1 Scope

This document specifies requirements for the production and trading (retail and e-commerce) of pet food for domesticated dogs and cats.

This document covers production of pet food from sourcing and receipt of ingredients and packaging to storage, processing (including specific processing requirements, e.g. heat treatment), packing, labelling and storage of products in order to facilitate safe production and trading of pet food. It also includes instructions for the uniform application of information provided on labels and representations for the purposes of product marketing and adherence to nutritional standards.

This document applies to both domestic and imported pet food products.

All pet foods which are **both** non-complete and balanced **and** APVMA registered are exempt from this standard.

NOTE 1 Imported products are also subject to official animal and plant biosecurity risk assessment and associated import requirements in order to prevent the introduction of foreign animal diseases. See [Bibliography](#) for further guidance.

NOTE 2 Refer to the relevant regulatory requirements for information regarding certification of pet food for export market access. See [Bibliography](#) for further guidance.

1.2 Normative references

The following documents are referred to in the text in such a way that some or all of their content constitutes requirements of this document.

NOTE Documents referenced for informative purposes are listed in the [Bibliography](#).

AS ISO/IEC 17025, *Testing and calibration laboratories*

AS/NZS ISO/IEC 17065, *Conformity assessment – Requirements for bodies certifying products, processes and services*

CXC 1-1969, *General Principles of Food Hygiene*

ASSOCIATION OF AMERICAN FEED CONTROL OFFICIALS. *AAFCO Official Publication*. Available at <https://www.aafco.org/>

AUSTRALIAN PESTICIDES AND VETERINARY MEDICINES AUTHORITY. *Guidelines for therapeutic pet foods that require registration as veterinary chemical products*. Available at <https://apvma.gov.au>

EUROPEAN PARLIAMENT. COUNCIL OF THE EUROPEAN UNION. Regulation (EC) No 767/ 2009. Available at <https://eur-lex.europa.eu/eli/reg/2009/767/oj>

EUROPEAN PET FOOD INDUSTRY ASSOCIATION. *FEDIAF Code of Good Labelling Practice for Pet Food*. Available at <https://europeanpetfood.org/self-regulation/labelling/>

EUROPEAN PET FOOD INDUSTRY FEDERATION. *FEDIAF Nutritional Guidelines*. Available at <https://europeanpetfood.org/self-regulation/nutritional-guidelines/>

1.3 Terms and definitions

For the purposes of this document, the following terms and definitions apply.

1.3.1 additive

any intentionally added component of pet food not normally consumed as a pet food ingredient, which affects the sensory and/or nutritive characteristics of pet food

Note 1 to entry: Includes a pre-mix which consists only of pet food additive components and microorganisms, enzymes, acidity regulators, trace elements, vitamins, preservatives, colouring agents, binders, dust suppressants, carriers, flavours and other products within the scope of this definition depending on the purpose of use and method of administration.

1.3.2 advertising

means of communication with consumer or potential consumer of a product or service such as but not limited to marketing collateral and activations, including any written or verbal statement, notice, presentation, sign, display, illustration or depiction, or labelling, which is directly or indirectly designed to influence the sale of any pet food or to create an interest in the purchase of any such product, whether same appears in a point of sale, newspaper, magazine or other periodical, in a catalogue, letter or sales promotional literature, in a radio or television broadcast, online or in any other media

1.3.3 authenticity

substantiated assurance that pet food ingredients, production processes and finished products are of the expected nature and substance based upon the product's representation, including pack information and advertising

1.3.4 average analysis

amount that the pet food manufacturer determines, based on —

- (a) an analysis, to be the average amount of the substance (nutrient/ingredient) in a named amount of the food; or
- (b) a calculation of the actual or average amount of the substance (nutrient/ingredient), in the finished product

1.3.5 best before date

date up to which the food will remain fully marketable and will retain any specific qualities for which express or implied claims have been made, if the food —

- (a) remains in an intact package during its storage; and
- (b) is stored in accordance with any storage conditions applicable

1.3.6 commercial sterility

absence of viable microorganisms capable of causing degradation of the food or creating a food safety issue at normal non-refrigerated conditions at which the food is likely to be held during manufacture, distribution and storage

1.3.7 complete pet food

food that is nutritionally complete and meets the minimum or maximum recommended nutritive requirements for cats or dogs as defined by the international nutritional publication (INP)

Note 1 to entry: Such a food may also commonly be described as “complete and balanced”.

1.3.8 co-product

any nutritive part of an animal excluding meat and includes offal, feet, meat trim, viscera, fat and bones

1.3.9**family of products**

group of products that may reasonably be expected to possess a similar nutritional profile by virtue of having a shared recipe base, product form and processing technology

1.3.10**guaranteed analysis**

amount that is expressed in the Nutrition Information panel where the value may not exceed the minimum declared or the maximum declared value

1.3.11**international nutritional publication****INP**

current versions of either the Association of American Feed Control Officials ([AAFCO](#)) Official Publication or European Pet Food Industry Federation (FEDIAF) official documents ([Nutritional Guidelines](#) and [Code of Good Labelling Practice](#))

1.3.12**label**

tag, brand, mark or statement in writing and any graphic representation or design or descriptive matter that is on or attached to pet food, its packaging or accompanying the pet food or displayed in connection with the food when it is sold

1.3.13**labelling**

process of assigning a label

Note 1 to entry: Refer to *guaranteed analysis* ([1.3.10](#)).

1.3.14**main ingredient**

ingredient existing in the greatest proportion of all ingredients, excluding water for processing, after rehydration factors are applied to relevant ingredients

1.3.15**meat**

clean flesh derived from slaughtered mammals, birds and fish and limited to that part of the striate muscle which is skeletal or that which is found in tongue, in the diaphragm, in the heart, or in the oesophagus; with or without the accompanying and overlying fat and portions of the skin, sinew, nerve and blood vessels which normally accompany the flesh

Note 1 to entry: When a species name is used e.g. "beef" then the material in the recipe supporting the species claim may be meat and/or animal co-product ingredient which is any nutritive part of an animal which contains protein, and which is ordinarily, in nature, used as a food by dogs or cats, whether fresh, chilled, frozen or dried, e.g. organs, rendered beef protein.

1.3.16**metabolizable energy****ME**

energy that is available to cats and dogs from foods

1.3.17**mixing bowl principle**

the weight of each ingredient as it is used by the pet food manufacturing facility, that is, concentrated material is considered without rehydration factors applied

1.3.18**namer ingredient**

ingredient referred to in the variety name

1.3.19**non-pre-packaged pet foods**

pet foods sold loose or in open or unsealed lidded trays, unsealed bags or packages where the contents can be altered without opening or changing the packaging

1.3.20**pet**

domesticated cat or dog

1.3.21**pet food**

any substance for cats and dogs to eat or drink including all types of dry, semi-moist, retorted, pasteurized, chilled, frozen, dried body parts, supplements and other consumer ready substances manufactured for consumption by domesticated cats or dogs including raw meat

Note 1 to entry: Refer to the relevant State or Territory authority and [PISC Technical Report 88](#) for further guidance.

1.3.22**Pet Food Adverse event System of Tracking (PetFAST)**

veterinary reporting system that is jointly managed by the Pet Food Industry Association of Australia (PFIAA) and the Australian Veterinary Association (AVA) to track suspected adverse events that indicate health problem(s) for dogs or cats potentially associated with pet food(s). The PetFAST team includes veterinarians from the AVA, who have extensive experience with pet food adverse events, and a program manager from the PFIAA

1.3.23**pet food business**

entity which has primary responsibility for the sale or supply of pet food product in Australia. A business will often be a manufacturer of a pet food product made in Australia, the importer of the pet food product or a business who owns, or has rights to, the product brand

1.3.24**pet food ingredient**

component added to a pet food product which may perform a nutritive function or may affect the characteristics of the pet food product, which includes components defined as additives

Note 1 to entry: Processing aids are not typically classified as ingredients.

Note 2 to entry: Ingredients may be of plant or animal (including aquatic, insect and microbial) origin or other organic or inorganic substances (e.g. vitamins).

Note 3 to entry: In [Section 2](#) (Manufacturing), this term is used interchangeably with “raw material”.

1.3.25**pet food manufacturing establishment**

premises controlled and/or operated by an entity eligible for certification to this standard

1.3.26**prescribed name**

name of an ingredient or additive as defined in international nutritional publications (INP) or the FSANZ Food Standards Code

Note 1 to entry: See [Bibliography](#) for further guidance.

1.3.27**processing aid**

substance that is used during the course of processing —

- (a) to perform a technological purpose in the course of processing; and
- (b) does not perform a technological purpose in the food for sale

Note 1 to entry: Examples include carry over of raw material preservatives; anti-foam added to liquid ingredients to prevent manufacturing issues; carriers used in premixes to improve flowability of the powder.

1.3.28

product claim

text or pictorial information on a pack that specifically relates to the pet food product, which may be implied or stated directly

1.3.29

range

set of different varieties of the same general type or recipe

Note 1 to entry: For example, an “Adult loaf range”.

1.3.30

red-banded pet meat

meat that is not suitable for human consumption and which poses a potential disease risk to animals unless thermally processed

1.3.31

shall

indicates that a statement is mandatory

1.3.32

shelf stable

condition achieved at which pet food, in its manufactured state, can be stored and handled under non-refrigerated conditions without microbial deterioration

1.3.33

should

indicates a recommendation

1.3.34

supplement

any consumer ready non-complete and balanced pet product the purpose of which is to provide additional vitamins, minerals, amino acids, electrolytes, fatty acids or other specific ingredients or nutrients, including probiotics and postbiotics, to a pet's diet

1.3.35

total carbohydrates

percentage equal to $[100\% - (\text{Crude Protein}\% + \text{Crude Fat}\% + \text{Moisture}\% + \text{Ash}\%)]$

1.3.36

use-by date

date, for a food for sale, after which it is estimated that the food should not be consumed because of health or safety reasons, if the food —

- (a) remains in an intact package during its storage; and
- (b) is stored in accordance with any storage conditions

1.3.37

variety

product which differs from the rest of the products in the range by its namer claim

Note 1 to entry: For example, the “with beef” variety has more beef than other varieties in the range, or the “large breed” varieties have larger kibbles than the varieties not named “large breed”.

1.4 New designs and innovations

This document does not prevent the use of products, production systems and the like that do not conform with the specific requirements of this document, or are not mentioned in it, provided the minimum performance requirements specified herein are met.

2 Manufacturing

2.1 Management and production practices at pet food manufacturing establishments

2.1.1 Outcome

Documented procedures and processes shall be in place to enable the production of safe pet food. This could be achieved by certification to the [FSSC 22000 scheme](#), the [BRCGS Global Standard Food Safety](#), the [SQF Code](#) or equivalent (see [Bibliography](#)).

2.1.2 Quality assurance system

A documented quality assurance system shall be in place in the pet food manufacturing establishment that —

- (a) includes the policy objectives for the production of pet food products that are safe and fit for purpose;
- (b) describes the organizational structure, the provision of resources and the provision of training of personnel;
- (c) describes the system of operational hygiene and process controls that ensure that pet food products are safe and fit for purpose and are accurately identified in accordance with this document;
- (d) specifies how each requirement of this document that applies to the production undertaken at the establishment will be met;
- (e) contains procedures for each stage of production, storage and distribution;
- (f) uses records to validate and verify the production of pet foods that are safe and fit for purpose;
- (g) provides for internal audits and management reviews of the operational activities and policy objectives. The results of these reviews and the action taken are to be documented and reviewed for continuous improvement;
- (h) provides for the implementation of a Hazard Analysis and Critical Control Point (HACCP) (refer to [Clause 2.1.3](#)) plan for each family of products produced at the establishment; and
- (i) has a system in place for the handling and traceability of raw materials and food contact packaging.

See [Clause 2.12](#) for requirements for record keeping.

2.1.3 HACCP plan

The pet food manufacturing establishment HACCP plan shall conform to the steps and principles set out in “Hazard analysis and critical control point (HACCP) system and guidelines for its application” in [CXC 1-1969, General Principles of Food Hygiene](#). The HACCP plan should be reviewed and audited by a suitably qualified third-party auditor.

2.2 Good manufacturing practices

2.2.1 Outcome

Good Manufacturing Practice (GMP) shall ensure that products are consistently manufactured to the quality standards appropriate for their intended use and in accordance with their specifications. GMP is concerned with both production and quality control. It is a means of giving consumers confidence that the products meet the required quality standards and are safe and reliable for the purposes for which they are intended.

Procedures to manage potential risks to the safety and quality of products from personnel, premises, surrounds, and services are detailed within this section and shall be documented (see [Clause 2.12](#)).

2.2.2 Controlling personal hygiene and other potential risks

Personal hygiene procedures shall ensure that —

- (a) staff facilities are maintained in a clean condition;
- (b) adequate locker/storage facilities are provided for staff to store personal effects including footwear and clothing;
- (c) protective clothing, footwear and head gear are provided where applicable;
- (d) eating, drinking and smoking/vaping areas are provided separate from production facilities;
- (e) personal hygiene policies shall be in place for the following:
 - (i) A program of training in the hygienic handling of product including recognition and management of human health risks such as zoonotic diseases and microbial contamination.
 - (ii) Hand sanitising such as washing.
 - (iii) Chewing and storage of food, drink or personal medication, eating, drinking and smoking/vaping locations and conditions.
 - (iv) Protective clothing and equipment requirements.
 - (v) Wearing of jewellery and watches, false nails, false eyelashes, piercings, and carrying of personal equipment.
 - (vi) Use of shared work-related equipment.
 - (vii) Treatment of cuts and wounds.
 - (viii) Staff entry and signage into areas where cooked product is handled.
 - (ix) The prevention of transmission of infectious conditions from personnel to product.
 - (x) Reporting of health issues that may affect product quality; and
- (f) visitors to the plant and contractors shall follow the personal hygiene procedures.

Work in progress, material to be reworked or reincorporated into product shall be identifiable and segregated in storage, including consideration of materials under biosecurity control.

See [Clause 2.12](#) for requirements for documentation.