

**For discussion  
on 25 April 2016**

**LegCo Panel on Food Safety and Environmental Hygiene  
Subcommittee on Issues Relating to Animal Welfare and Cruelty to Animals**

**Safety of Pet Food Products in Hong Kong**

**INTRODUCTION**

This paper briefs Members of the Subcommittee on issues relating to the safety of pet food products in Hong Kong.

**BACKGROUND**

2. The term ‘pet food’ covers a wide range of ‘foods’ for different species. In general, it refers to feed for dogs and cats, as well as other common pets, such as birds and rabbits etc. According to the Thematic Household Survey Report No. 48 published by the Census and Statistics Department (C&SD) in 2011, a total of 247,500 dogs and 167,600 cats were being kept by households in Hong Kong. According to that Report, it was estimated that 10.6% of the households own dogs or cats, which are the most common types of pets in Hong Kong.

3. The past years see a growing tendency for pet owners to feed their pets with commercial pet food readily available in the market. According to the information gathered by the Agriculture, Fisheries and Conservation Department (AFCD) from some pet food companies, about 70% of the pet owners in Hong Kong feed their pets with commercial pet food. The others may be those who choose to prepare homemade food for their pets from fresh ingredients that are usually obtained from outlets selling food for human consumption.

4. For the purpose of this paper, we will broadly categorise them into commercial pet food and homemade pet food. Commercial pet food is usually pre-packaged/processed food available in the market solely for pet consumption, which may be available in the form of dry food, wet food, semi-moist food, freeze-dried food and frozen food. Homemade pet food refers to food made or cooked from fresh ingredients for pets by their owners.

5. At present, the supply and use of fodder for food-production animals is subject to regulatory control under the Public Health (Animal and Birds) (Chemical Residues) Regulations (Cap. 139 sub. leg. N). Pet food in general is not subject to regulation in Hong Kong in respect of its production, import or distribution.

6. We are not aware of any major production of pet food locally. Most of the commercial pet food items consumed in Hong Kong are imported.

## **SAFETY OF PET FOOD PRODUCTS IN HONG KONG**

### *(a) Source of Pet Food Products in Hong Kong*

7. As mentioned above, it is estimated that about 70% of the pet owners in Hong Kong feed their pets with commercial pet food. Most of this pet food is pre-packaged food imported from places outside Hong Kong. According to statistics collected by C&SD, dog or cat food imports amounted to 34.5 million kilograms (Kg), 37.2 million Kg and 35.3 million Kg in 2013, 2014 and 2015 respectively.

8. The United States (US) is the largest source of pre-packaged/processed pet food imported into Hong Kong, accounting for over 40% of the pet food imported over the past three years. Other sources include countries belonging to the European Union (EU) (such as Belgium, Germany, Italy and the United Kingdom), Canada, Thailand, and the Mainland of China.

9. As far as we understand it, commercial pet food products are sold locally mainly through the following channels – supermarkets, pet shops or pet accessories shops, and veterinary clinics. Some major pet food manufacturers outside Hong Kong would appoint local agents to act as wholesalers, and some of them might directly take up the wholesale role for their business in Hong Kong. Some also recruit local veterinarians as pet food consultants and establish local offices in Hong Kong.

10. In recent years, we have seen pet owners becoming more conscious of issues related to the health and welfare of their pets. We have observed an increasing tendency for some owners to feed their pets with a variety of novel commercial foods, such as organic pet food and raw pet food. Since different pet animals may have different dietary requirements even if they are of the same species, it is common that registered veterinary surgeons would provide

recommendations on specific types of food that may suit the pets most, by taking into account the health status and nutrition requirements of individual pets.

*(b) Complaints received with regard to pet food*

11. According to the information provided by the Consumer Council, it receives about 20 complaints with regard to pet food products every year. Most of the complaints received were related to the quality of the pet food products, including illness of pets suspected to be caused by consumption of pet food, and foreign substances found in pet food products. Some of the complaints were related to pricing and delay in delivery.

12. A breakdown of the complaints received by the Consumer Council in 2012 to 2015 are listed below-

Table 1. Complaints with regard to pet food products received by the Consumer Council in 2012 to 2015

	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>
Mode of retailing	0	0	3	1
Hygiene	0	2	1	0
Delay in delivery	1	2	3	6
Pricing/disagreement on price	1	2	2	1
Quality of product	9	11	14	6
Expired product	2	1	1	2
Wrong model	3	1	0	1
Others	3	1	0	3
<b>Total:</b>	<b>19</b>	<b>20</b>	<b>24</b>	<b>20</b>

13. Between April 2012 and March 2016, AFCD received a total of nine complaints from the public with regard to pet food products sold in Hong Kong. Most of these complaints were related to the hygiene and quality of pet food, or illness of pets suspected to be caused by consumption of the relevant pet food.

14. A breakdown of the complaints received by AFCD between April 2012 and March 2016 is listed below –

Table 2. Complaints with regard to pet food products received by AFCD between April 2012 and March 2016

	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>
Hygiene and quality of pet food or illness of pets suspected to be caused by consumption of pet food	0	2	1	4	0
Manufacturing and sale	0	0	0	1	1
<b>Total:</b>	<b>0</b>	<b>2</b>	<b>1</b>	<b>5</b>	<b>1</b>

15. Upon receipt of a complaint, AFCD would contact the complainant to provide assistance, and liaise with the manufacturers, importers or distributors of the pet food concerned to gather more information when necessary. A response will be provided to the complainant as appropriate.

*(c) Studies conducted by the Consumer Council*

16. In 2014 and 2015 respectively, the Consumer Council conducted two studies on commercial pet food available on the market<sup>1</sup>. In the 2014 study, the Consumer Council collected samples from 39 brands of pre-packaged dry pet food, including 20 brands of food for dogs and 19 brands for cats. The samples were tested for contamination with aflatoxin B1, melamine and cyanuric acid, as well as microbial contaminants *Salmonella* and *E. Coli O157*. The test results showed that all of the samples were free of contamination from microbes. Although trace amount of contaminants<sup>2</sup> were detected in some of the samples, the levels were all well below the safety limits recommended by the EU and the US, and considered unlikely to pose significant health risks to the pet animals. The Consumer Council concluded that the test results revealed a low safety risk on the part of the dry pet food. This notwithstanding, in view of the growing population of pets kept in Hong Kong, the Consumer Council suggests the Government to consider

<sup>1</sup> Choice Magazine (Issue No. 450) published in April 2014, pp. 4-15; and Choice Magazine (Issue No. 468) published in October 2015, pp. 18-23.

<sup>2</sup> Traces of aflatoxin B1 were detected in 7 samples; melamine in 2 samples and cyanuric acid in 2 samples.

conducting random sampling and testing of pet foods, and publishing the test results for consumers' information.

17. In the 2015 study, the Consumer Council focused on raw and undercooked pet food. Raw pet food generally refers to those containing ingredients such as meat, bones and organs that have not been cooked or are partially cooked. They are usually sold in frozen or freeze-dried form. Undercooked pet food refers to pet food that has been cooked under low temperature for a short period of time before sale. Samples from 17 brands of raw and undercooked pet food (11 for dogs, 5 for cats and 1 for both dogs and cats) imported from the US, the UK, New Zealand and Australia were taken and tested for microbial contamination by *Salmonella*, *Listeria monocytogenes* and *E. Coli O157*. These are zoonotic pathogens, which may affect both animal health and human health. Among the samples tested, three frozen raw pet food samples were found to have been contaminated with *Salmonella*. None of the samples were found to have the other two microbial contaminants.

18. In the study report, the Consumer Council notes that some pet owners choose to feed dogs and cats with raw and undercooked pet food but some public health and veterinary experts do not recommend feeding such types of food to pets. If such pet food is desired, the Consumer Council reminds consumers to handle such pet food with care and be vigilant in maintaining personal hygiene. The Consumer Council also recommends pet food manufacturers to ensure that the products are free of pathogens in order to lower the public health risk, and improve the labelling of the pet food products, e.g. providing clear instructions on the proper handling of raw and undercooked pet food. In addition, the Consumer Council notes that some neighbouring places such as Taiwan do conduct regular testing on pet foods with the test results announced, which is backed with legislative control. It invites the Government to review the position and assess whether regulation of pet food is required in Hong Kong.

19. In the light of the study results by the Consumer Council, AFCD has followed up with the manufacturers and importers concerned. AFCD has also reminded pet food suppliers, retailers and pet owners that raw pet food, in comparison to pre-packaged/processed pet food, is more susceptible to contamination with pathogens, such as *Salmonella* and *Listeria*, in the course of transportation, storage and handling.

20. AFCD has also reminded pet owners to purchase pet food products from reliable pet shops or retailers, and be aware of the higher risk of contamination of pet food that has been re-packaged, frozen, or sold in bulk or from unknown origins.

## **OUR OBSERVATIONS**

21. On the safety of pet food, there are at present no commonly adopted standards at the international level.

22. Major pet food exporters, such as the US and the EU, have put in place regulations governing the manufacture, packaging, labelling and distribution of pet food products, and have set safety standards on their own. These places have a rather prominent pet food manufacturing industry, supplying both the domestic markets as well as exports.

23. We have not come across major incidents concerning the safety of pet food in Hong Kong in recent years. Indeed, most of the pet food products available in Hong Kong are imported from places such as the US and the EU where the same pet food products are being consumed in their domestic markets in large quantities. Relative to the size of the pet population in Hong Kong, the number of complaints we received in relation to the safety of pet food products over the past few years is such that we believe the safety of pet food in Hong Kong is generally in a satisfactory state. The results of the two studies conducted by the Consumer Council (as outlined in paragraphs 16 to 18 above) also help illustrate that the quality and hygiene standards of pet food in Hong Kong are generally satisfactory.

24. Nevertheless, taking into account the results of the studies and suggestions from the Consumer Council, we consider that there are merits in conducting regular testing on pet food products in Hong Kong. The focus should be on the common microbial contaminants and substances of concern. The test results would enable us to assess, on a more informed basis, whether and the extent to which the safety of pet foods is a concern and how the present measures on pet food products may be enhanced. We would continue to closely monitor the local situation and keep in view further developments on the international front related to the safety of pet food products, as well as enhancing public education as appropriate.

## **ADVICE SOUGHT**

25. Members are invited to note the content of this paper and offer comments on issues relating to the safety of pet food products in Hong Kong.

**Food and Health Bureau**

**Agriculture, Fisheries and Conservation Department**

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