

**For discussion
on 9 June 2020**

LegCo Panel on Food Safety and Environmental Hygiene

Results of the Study on Pet Food Products in Hong Kong

PURPOSE

This paper briefs Members on the results of the Study on Pet Food Products in Hong Kong (the Study).

BACKGROUND

2. At present, the supply and use of fodder for food-production animals is subject to control under the Public Health (Animal and Birds) (Chemical Residues) Regulation (Cap. 139N). Pet food in general is not subject to regulation in Hong Kong in respect of its production, import or distribution. Commercial pet food¹ is largely imported from places outside Hong Kong and we are not aware of any major production of pet food locally.

3. In order to assess whether and the extent to which the safety of pet food in Hong Kong is a concern, the Agriculture, Fisheries and Conservation Department (AFCD) commissioned a study in October 2017 by engaging a contractor to collect and test a total of 360 pet food products that were commonly available in the market of Hong Kong. The Study was completed in February 2020. The final report of the Study is available at AFCD's website². The details of the Study and the test results are summarised in the following paragraphs –

¹ Commercial pet food is usually pre-packaged/processed food available in the market for pet consumption, which may be available in the form of dry food, wet food, semi-moist food, freeze-dried food and frozen food.

² https://www.afcd.gov.hk/english/whatsnew/what_qua/files/common/Pet_food_Testing_Exercise_Report.pdf

DETAILS OF THE STUDY

4. The Study consists of six rounds of sampling of pet food products available for sale in the market, with 60 samples collected in each round. A total of 360 pet food products were collected and tested for the following eight common harmful microbes and substances:

- (i) *Salmonella*;
- (ii) *Escherichia coli* (*E. coli*), including *O157*;
- (iii) *Listeria monocytogenes*;
- (iv) Aflatoxin B1;
- (v) Melamine
- (vi) Malathion
- (vii) Lead
- (viii) Arsenic

5. Making reference to the estimated population of different kind of pets kept in Hong Kong³, among the 360 samples, 180 samples (i.e. 50%) were dry and wet food for dogs; 108 samples (i.e. 30%) were dry and wet food for cats; and 72 samples (i.e. 20%) were other food types for dogs and cats, such as treat, semi-moist food, and freeze-dried food, as well as feed for other species such as birds, rabbits and rodents.

6. A market survey was first conducted by the contractor to collect information about pet food products that were commonly available for sale so as to enable random sampling of products. During the survey, the contractor visited 140 stores that sold pet food products, including supermarket chains stores, pet chain stores and independent pet stores, and found 5 915 different pet food products, including 3 391 products for dogs, 2 029 for cats, 595 for other pets (i.e. rabbits, rodents and birds)⁴. Pet food products were then randomly selected based on the result of the survey, i.e. their respective popularity found in the survey, for testing.

7. All samples collected were tested by methods accredited under the Deutsche Akkreditierungsstelle GmbH (DAkkS) Accreditation Scheme for testing of feeding stuffs. DAkkS is the national accreditation body in Germany and also one of the partners of Mutual Recognition Arrangement

³ According to the findings of a consultancy study on the development of the veterinary profession in Hong Kong released by the Veterinary Surgeons Board of Hong Kong in 2017, there were about 681 600 pets kept in Hong Kong, including 297 500 dogs, 213 100 cats, and 171 100 other pets (e.g. hamster, chinchilla, rabbits, and birds etc).

⁴ According to the report, as some pet food products are intended for more than one animal species (e.g. a canned food for both dog and cat), the same products could be counted twice, once for dogs and once for cats; hence the sum of the products for different animal species is larger than 5 915.

of the Hong Kong Laboratory Accreditation Scheme, which is under the Hong Kong Accreditation Service of the Innovation and Technology Commission.

RESULTS OF THE STUDY

8. Since there are at present no commonly adopted standards on the safety of pet food at the international level, when determining the satisfactory standards for test results of the eight harmful microbes and substances in the Study, references were made to the relevant legislation of other places/regions where extensive regulatory pet food safety standards are in place, including the European Union (EU), Japan, Mainland and Taiwan. While the standards might slightly vary between these places/regions, standards that are most commonly adopted by these places/regions are regarded as satisfactory standards in the Study. An overview of the satisfactory standards adopted in the Study is set out below

Table 1. Satisfactory standards of the test results of the eight harmful microbes and substances in the Study

	Harmful microbes or substances	Satisfactory standards
1.	<i>Salmonella</i>	Not detected
2a.	<i>Escherichia coli</i>	< 10 cfu/g ⁵
2b.	<i>Escherichia coli O157</i>	Not detected
3.	<i>Listeria monocytogenes</i>	Not detected
4.	Aflatoxin B1	0.01 mg/kg at 12% moisture content ⁶
5.	Melamine	2.5 mg/kg at 12% moisture content or as sold ⁷
6.	Malathion	10 mg/kg at 10% moisture content
7.	Lead	5 mg/kg at 12% moisture content
8.	Arsenic (inorganic arsenic)	2 mg/kg at 12% moisture content

⁵ *E. coli* is a commonly used faecal indicator organism, its presence in food generally indicates direct or indirect faecal contamination. The limit of reporting of test method for *E. coli* used in the Study is 10 cfu/g.

⁶ Moisture content of different types of pet food products can vary considerably, which may affect the level of a chemical tested in a sample. Therefore, standards of chemical contaminants in pet food in other places/regions are often set at a specific moisture content. Test results of chemical contaminants in the Study were adjusted to the respective moisture content for comparison.

⁷ Products submitted for testing “as sold” (i.e. no adjustment of test results in respect of moisture content), are also acceptable in reference to the standards of Mainland and EU for pet canned food.

9. The results of all samples for microbiological tests were satisfactory and no sample was tested positive for *Salmonella*, *E. coli* (including *O157*) and *Listeria monocytogenes*. The test results of all samples for chemical contaminants were also satisfactory and no sample was tested with a level of Aflatoxin B1, Melamine, Malathion, Lead and inorganic Arsenic exceeding the satisfactory standards. In general, none of the samples was tested with an unsatisfactory result in relation to the standards set out in Table 1 above.

OUR OBSERVATIONS

10. Most of the commercial pet food products available in Hong Kong are imported from places where the same products are supplied to their domestic markets. While there are at present no commonly adopted standards at the international level, results of the Study reflect well on the overall safety of pet food products sold in Hong Kong market. In addition, we have not come across any major incident concerning the safety of pet food products in Hong Kong in recent years⁸.

11. 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 conducting public education as appropriate.

ADVICE SOUGHT

12. Members are invited to note the results of the Study above.

Food and Health Bureau
Agriculture, Fisheries and Conservation Department
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⁸ In the past five years, AFCD received an average of around five complaint cases with regard to pet food products each year, none of which involved report of outbreak of pet animals falling ill from consuming pet food products.