

Introduction of a pet food safety law in Japan

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Summary

In response to a growing concern among Japanese people over the safety of pet food marketed in Japan, a Pet Food Safety Law was approved by the Diet in June 2008 and will be enforced in June 2009. The law obliges manufacturers and importers of pet food to observe the standards for production methods and labelling and compositional specifications set by the Ministry of the Environment (MoE) and the Ministry of Agriculture, Forestry and Fisheries (MAFF). The law also obliges manufacturers, importers and distributors (excluding retailers) of pet food to keep records of the name and quantity of pet food manufactured, imported and distributed. Within the compositional specifications, maximum residue limits have been established for aflatoxin B₁ and certain organophosphorus pesticides and chemical preservatives. The establishment of standards for other mycotoxins, heavy metals, organochloride pesticides and other additives is scheduled for the near future.

Keywords

Animal, Companion animal, Feed, Food, Japan, Pet, Safety.

Introduzione di una legge per la sicurezza del cibo per animali in Giappone

Riassunto

In risposta alla crescente preoccupazione manifestata dai giapponesi per la sicurezza del cibo per animali commercializzato in questo paese, nel giugno 2008 la Dieta Nazionale ha approvato una

legge specifica ("Pet Food Safety Law") che entrerà in vigore a giugno 2009. La legge obbliga produttori e importatori di cibo per animali ad osservare gli standard relativi ai metodi di produzione e all'etichettatura e le specifiche di composizione stabilite dal Ministero dell'ambiente e dal Ministero dell'agricoltura, dei beni forestali e della pesca. Obbliga inoltre produttori, importatori e distributori (ad eccezione dei rivenditori) di cibo per animali a registrare il nome e la quantità di cibo prodotto, importato e distribuito. Per quanto riguarda le specifiche di composizione sono stati stabiliti limiti massimi di residuo per l'aflatoxina B₁ e alcuni conservanti chimici e pesticidi organofosforici. Nel prossimo futuro verranno stabiliti gli standard relativi ad altre micotossine, metalli pesanti, pesticidi organoclorurati e altri additivi.

Parole chiave

Animale, Animale da compagnia, Animale domestico, Cibo, Giappone, Sicurezza.

Introduction

With the change of lifestyle of Japanese people, the number of dogs and cats kept in Japan, as well as the proportion of Japanese households that keep animals, are increasing and the role that they play as companion animals is becoming more important.

Early in 2007, approximately 2 200 dogs and 1 950 cats in the United States developed kidney failures and died after eating pet food contaminated with melamine and related compounds, and more than 150 brands of pet food were voluntarily recalled by a number of companies. As a result of investigations by the Food and Drug Administration (FDA), these pet food manufacturers were found to be using

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wheat gluten imported from a specific company in China as an ingredient in their pet food products. Rice protein, imported from another supplier in China, also used as an ingredient in pet food, was also found to be contaminated with melamine. The FDA issued an import alert that prohibited all shipments of vegetable protein products from China unless they were free from melamine and related compounds. Melamine is a small, nitrogen-containing molecule that has a number of industrial uses but has no approved use as an ingredient in animal feed or human food in the United States. It was added to animal feed as a filler to enhance the apparent protein level in China.

In response to these events in the United States, in April 2007, the Japanese Ministry of Agriculture, Forestry and Fisheries (MAFF) issued a warning to the feed and pet food industry, providing them with information on the situation in the United States. The MAFF also issued an administrative guidance promoting an examination and suspension of the use of vegetable protein imported from China. In June 2007, a dog food, identical to the one which was subjected to a recall in the United States, was found to have been imported into Japan and was then subjected to a voluntary recall. Although no animal health problem was reported in Japan resulting from the ingestion of pet food contaminated with melamine and related compounds, the incident raised concern among Japanese people over the safety of pet food marketed in Japan.

In Japan, there is a law that regulates the safety of feed for food animals (cattle, sheep, goats, pigs, poultry and cultured aquatic animals). However, there was no law that regulated the safety of pet food. The safety of pet food only depended on voluntary regulation by the industry. In response to these concerns among Japanese people over the safety of pet food, the Ministry of the Environment (MoE) and the MAFF established a study group to examine the measures that should be taken to ensure the safety of pet food. The study group produced an interim report in December 2007 which recommended the introduction of a law to ensure the safety of pet food. Based on this

recommendation, a draft law was prepared jointly by the two ministries and submitted to the Diet on 4 March 2008 and approved by the Diet on 11 June 2008. The law was published on 18 June 2008 (3). A cabinet order was issued on 3 December 2008, specifying that the date of enforcement would be 1 June 2009 and that the target companion animals were dogs and cats (2).

Companion animal and pet food situation in Japan

Companion animal situation in Japan

The number of dogs and cats kept as companion animals in early October 2008 was estimated to be 13.1 million and 13.7 million, respectively (5). In the past five years, the number of dogs and cats has increased by 44% and 77%, respectively (Fig. 1). The proportion of households that keep dogs and cats are 18.2% and 11.4%, respectively. In addition, 3.3% of households in Japan keep tropical fish, 2.3% turtles, 2.3% birds and 1.4% rabbits (Fig. 2).

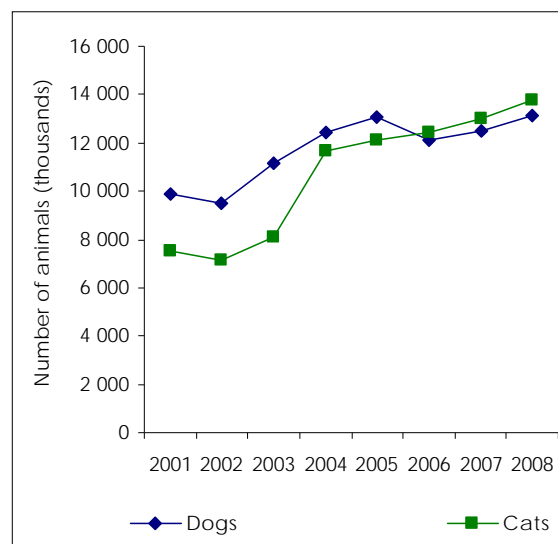


Figure 1 Evolution of the number of dogs and cats kept as companion animals in Japan (5)

With the change of their lifestyle in recent years, increasing numbers of Japanese people treat the animals they keep as their companions and members of the family. This

trend is indicated by the fact that the proportion of the newly built apartments in Tokyo that allow their residents to keep animals increased from 1.1% in 1998 to 86.2% in 2007 (7).

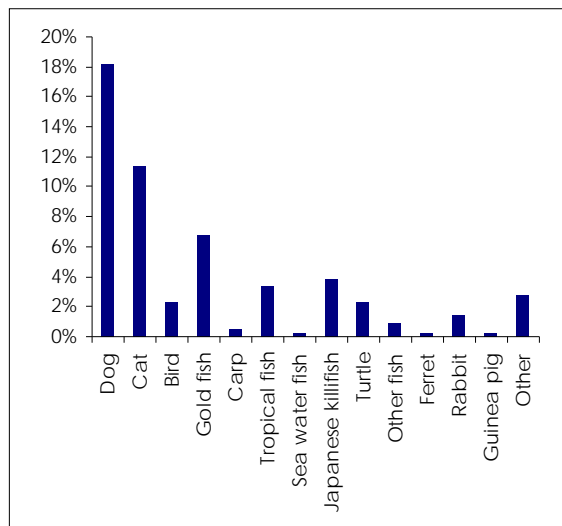


Figure 2
Proportion of households keeping dogs, cats and other animals as companion animals (5)

According to a survey conducted by the MAFF and MoE on the extent of reliance of companion animal owners on pet food for their animals, 68% of dog owners and 78% of cat owners feed their animals solely with pet food (6).

Pet food situation in Japan

The amount of pet food marketed in Japan in fiscal year 2007 was 727 485 metric tons (worth 244 billion yen) (US\$2.22 billion) (4). This is an increase of 34% (38%) compared to the amount marketed in 1993. Figure 3 shows the evolution of the quantity of pet food marketed in Japan, separated into imported and domestically produced products. The imported pet food represented 52% of the total amount marketed in Japan in 2007.

Figure 4 shows the proportion of pet food marketed in Japan for specific animal species. A total of 59% of the pet food marketed in Japan is destined for dogs and 35% for cats (4). Figure 5 shows the proportion of pet food imported into Japan from international suppliers. Of the dog food imported into

Japan, 70% originates in the United States and Australia and 50% of the cat food comes from Thailand (4).

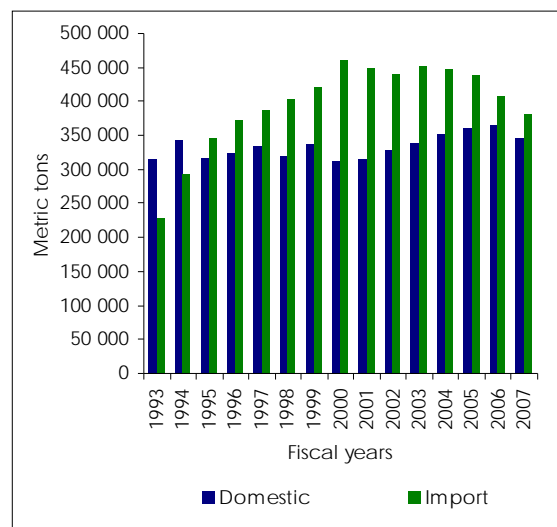


Figure 3
Evolution of the quantities of domestically produced and imported pet food marketed in Japan (4)

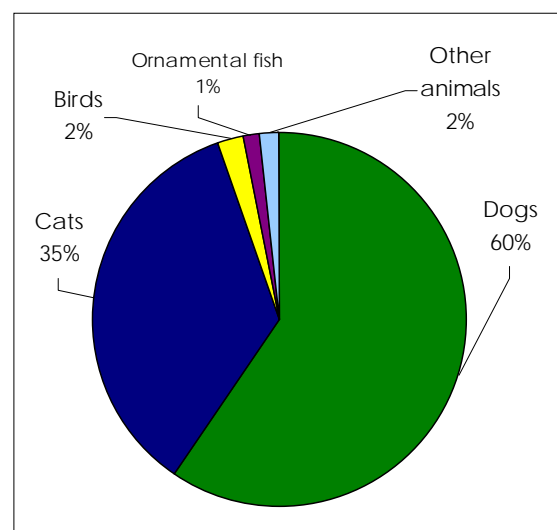


Figure 4
Proportion of pet foods marketed in Japan for specific species (4)

There are three types of pet food which are classified according to their feeding purposes, namely:

- complete and balanced nutrition pet food
- snacks
- pet food for other purposes.

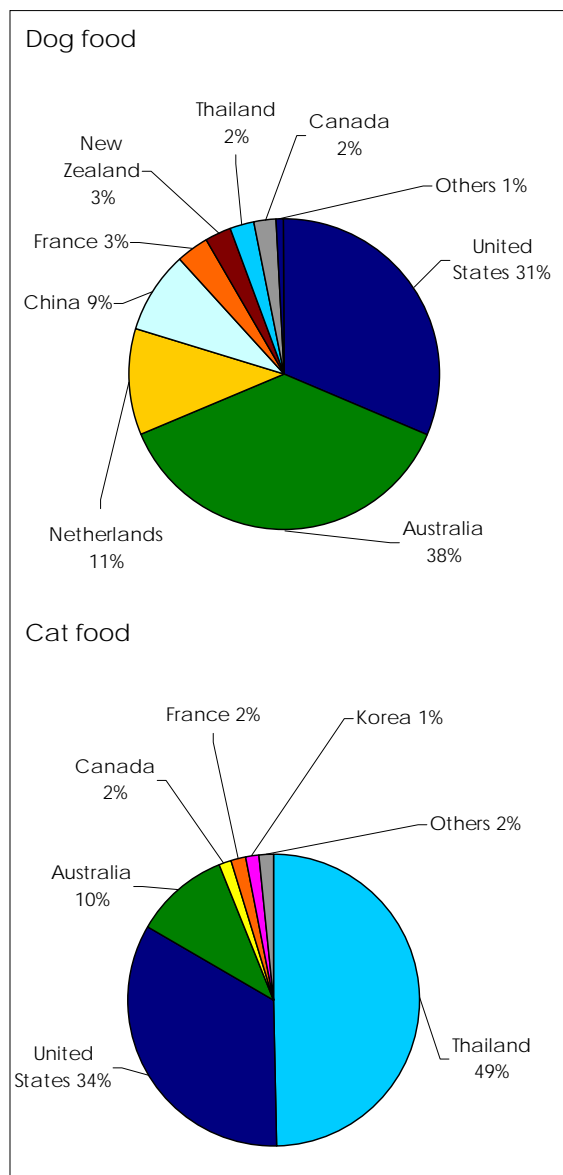


Figure 5 Proportion of dog and cat food imported into Japan from various countries (4)

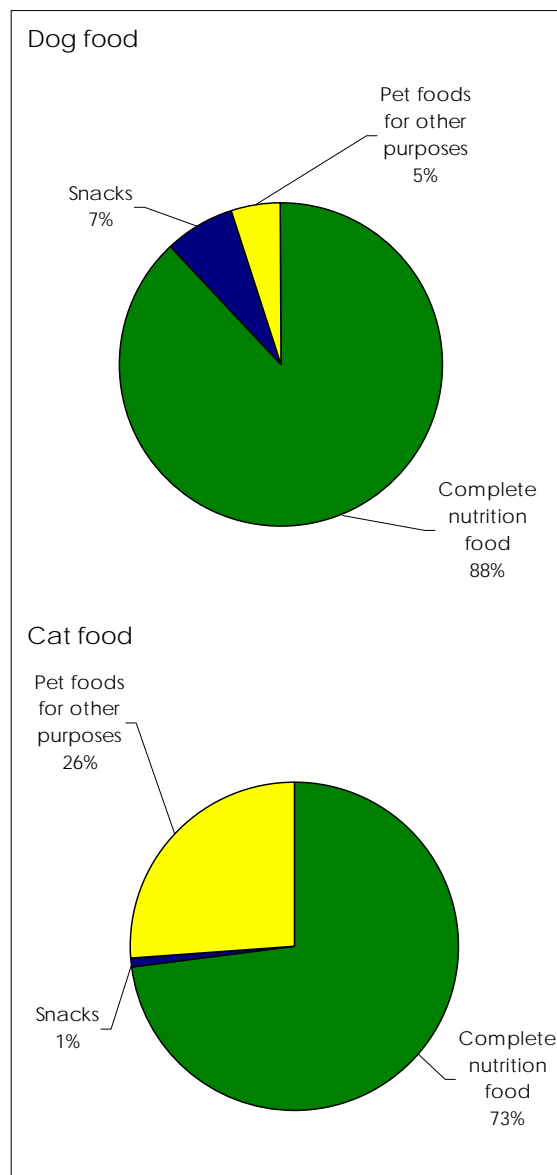


Figure 6 Proportion of dog and cat food marketed in Japan, classified by food types (4)

Complete nutrition pet food provides animals with sufficient nutrition without supplementary food. Snacks are those used between meals or as rewards. Pet foods for other purposes are those complementary pet foods used for special nutritional needs, e.g. side dish, nutrient supply, energy supply and therapeutic diet. Figure 6 shows the proportions of pet food marketed in Japan according to these types.

Voluntary regulation on pet food

Japan Pet Food Association

The Japan Pet Food Association has been established since 1969 and had 84 pet food manufacturers and importers as its members at 25 May 2009, representing 90% of the total amount of pet food marketed in Japan. The Association establishes voluntary guidelines named 'Code of Practice for the Manufacturing of Safe Pet Foods'. These guidelines represent

self-responsible standards intended to secure pet food safety distributed in Japan by providing a basic framework to be adopted in developing, designing, manufacturing and distributing pet food in Japan. The Association conducts surveys on the number of companion animals kept in Japan and industrial surveys on the quantities and types of pet food marketed in Japan.

Pet Food Fair Trade Association

The Pet Food Fair Trade Association has been in existence since 1974 and its objective is to contribute to the fair trade and protection of consumers by ensuring the smooth and proper implementation of the Fair Competition Code concerning the Labelling of Pet Food. It had 58 manufacturers and distributors as its members at 25 May 2009. The Code requires that the following nine items are labelled on retailed pet food products as approved by the Fair Trade Commission:

- classification (dog food or cat food)
- purpose of pet food (complete nutritional food, snacks or pet food for other purposes)
- quantity of content
- feeding directions
- best-before or manufacture date
- guaranteed analysis
- ingredients used
- country of origin
- name and address of the manufacturer or importer.

The Association conducts surveys on the compliance with the Rules. In cases where non-compliance is found, a company violating the Rules will be subjected to a warning, penalty or expulsion from the Association. The Association introduced new labelling rules for additives that have been effective since 21 December 2008, requiring its members to label any additives in the ingredients list used in the manufacture of pet food.

Society of Pet Animal Nutrition

The Japanese Society of Pet Animal Nutrition was established in 1998 and its objective is to exchange information and knowledge among its members on the nutrition of companion animals and on improvements to pet food. The Society has scientists, students, veterinary

practitioners, pet shop employees and housewives as its members. It organises courses on nutrition for companion animals and academic meetings for the exchange of information and knowledge.

Pet Food Safety Law

Outline of the Pet Food Safety Law

The objective of the Law for Ensuring the Safety of Feed for Companion Animals (Pet Food Safety Law) is to ensure the safety of pet food and thus to protect the health of companion animals and contribute to animal welfare. To achieve this objective, the law empowers the MAFF and MoE as follows:

- to establish standards for production methods and labelling of pet food, as well as specification of the composition of pet food
- to prohibit the manufacturing, importation and marketing of pet food that does not meet these standards and specifications or contains harmful substances
- to order the manufacturers, importers and distributors to dispose and recall pet food products that do not meet these standards and/or specifications and products that contain harmful substances
- to obtain reports from and to have their officials make on-site inspections of the manufacturers, importers and distributors of pet food.

The law empowers the Minister of Agriculture, Forestry and Fisheries to request officials of the Food and Agricultural Materials Inspection Centre (FAMIC) to make on-site inspections under instructions from the Minister.

In addition, the law obliges manufacturers and importers of pet food to notify the Minister of Environment and the Minister of Agriculture, Forestry and Fisheries of the names of their representatives and of the name and address of their plants and warehouses, before they start their business (Table I). The law also obliges manufacturers, importers and distributors of pet food to keep records of the name and quantity of pet food that they have manufactured, imported and distributed. In addition, manufacturers are obliged to record the manufacturing date of pet food and the

Table I
Obligation of manufacturers, importers and distributors of pet food under the Pet Food Safety Law

Activity	Obligation to report to the MAFF before starting business	Obligation to keep production/sales records	Obligation to report to the MAFF when requested
Manufacturers	Yes	Yes	Yes
Importers	Yes	Yes	Yes
Wholesalers	No	Yes	Yes
Retailers	No	No	Yes

MAFF Ministry of Agriculture, Forestry and Fisheries, Japan

name, arrival date and supplier name for each ingredient. For imported pet food, importers are obliged to record import date, export country, name of exporter, type of packing, country of manufacture, name of manufacturer and ingredient list. When transactions of pet food are made between manufacturers, importers and distributors, the name and amount of pet food, name of the person to whom the pet food is sold, transaction date and type of packing must be recorded.

The Pet Food Safety Law does not apply to the manufacture, importation and distribution of pet foods to be exported from Japan to other countries (1).

The roles and obligations of different stakeholders are shown in Figure 7. These provisions will come into effect on 1 June 2009.

Proposed standards and specifications of pet food

The MoE and the MAFF have established standards for aflatoxin B₁, some organo-phosphorus pesticides and additives in pet food (Table II).

In addition, both Ministries have established manufacturing standards to control the propagation of harmful microbiological agents (Table III).

Other than these hazards, the Ministers plan to establish standards for a number of other mycotoxins (deoxynivalenol), heavy metals (mercury, cadmium, lead and arsenic), organochloride agricultural chemicals (benzene hexachloride [BHC], dichlorodiphenyltrichloroethane [DDT], aldrin/dieldrin, endrin, heptachlor/heptachlor-epoxide) and feed

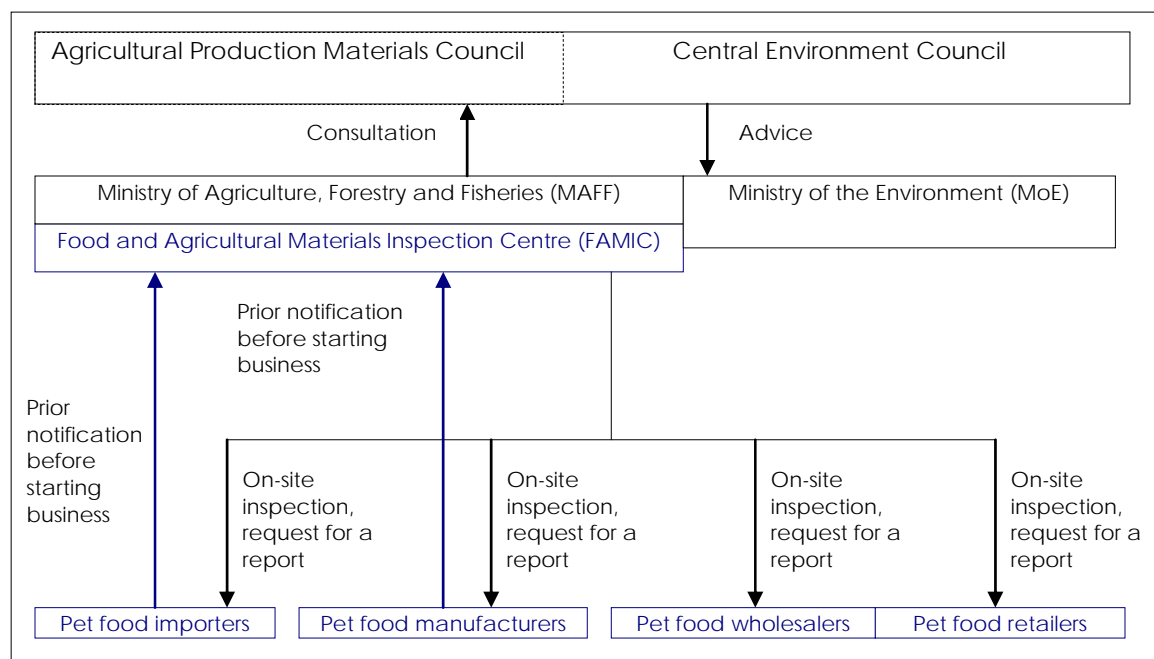


Figure 7
Oversight of pet food importers, manufacturers, wholesalers and retailers

Table II
Standards in pet food for mycotoxins, pesticides and antioxidants effective from 1 December 2009

Hazards	Maximum residue limits
Aflatoxin B ₁	20 ppb
Chlorpyrifos-methyl	10 ppm
Pirimiphos-methyl	2 ppm
Malathion	10 ppm
Methamidophos	0.2 ppm
Glyphosate	15 ppm
Ethoxyquin	150 ppm in total and
Butylhydroxyanisol	ethoxyquin should not
Dibutylhydroxytoluene	exceed 75 ppm in dog food

ppb parts per billion

ppm parts per million

additives (sodium nitrite and sobinic acid) in the future.

Under the Pet Food Safety Law, the following must be labelled on pet food products:

- name of product (dog food or cat food)
- best-before date
- name and address of the manufacturer, importer or distributor
- country of origin
- ingredients, including additives used.

This obligation will not be an additional burden to the manufacturers and importers, because these items were already included in the Fair Trade Rules.

The standards and specifications are set in consultation with the Agricultural Production

Materials Council and the Central Environment Council (expert panels of the two ministries).

Table III
Standards for the manufacture of pet food effective from 1 June 2009

Hazards	Manufacturing standards
Harmful microbiological agents	Proper heat treatment and moisture adjustments should be applied
Additives	Propylenglycol should not be used for cat food
Ingredients	Ingredients containing harmful substances and/or substances contaminated with harmful microbiological agents should not be used

Conclusion

In addition to voluntary regulations by the industry and others, a law to ensure the safety of pet food was published on 18 June 2008 and will be enforced on 1 June 2009. The law will not only contribute to the assurance of safety and improvement of the quality of pet food, but will also prevent products containing harmful substances from being marketed, and thus contribute to the protection of the health of companion animals.

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