PET FOOD INDUSTRY
ASSOCIATION OF SOUTHERN AFRICA

Version: 2016.v2

PFI code: Product Control & Self-Policing

1. PRIMARY OBJECTIVE

1.1. To on a random basis, through random retail or any other source purchasing, check that all pet food products in the market meet the necessary quality and registration standards including labeling and nutritional quantitative standard and that the products are what they claim to be with respect to ingredient make-up

1.2. To collect new products that appear from time to time through random purchasing in the market and evaluate them as per A.1

1.3. To evaluate those products in the market that are reported as problem products, from time to time. Problems being that they are not manufactured to standard or that they have been reported as causing a feed related problem with the pet that has consumed the food. Or there is no indication of the correct mandatory information required on the packaging, including product registration under Act 36, or the claims that appear on the packaging are in the PFI Member opinion false or misleading.

2. SAMPLING

2.1. **Sampling**: The PFI Executive or a PFI Member will, on a regular basis:

2.2.1 Purchase a new product launched on the market

a. Purchase a new product launched on the market

b. Purchase a reputed poor quality product

c. Purchase randomly a product from the membership of the PFI or non-members.

d. Purchase any product against which a consumer has complained or obtain the product from the consumer

e. A PFI Member may draw the PFI Executive attention to a product that should in their opinion be investigated, as well, for the PFI Executive to proceed further.

f. ALL PURCHASES, by the PFI or by a Member, will be funded by the PFI and so any record of the purchase that is available must be supplied to the PFI.

g. ALL Purchases or complaints of product that are made, the offending product must be supplied to the PFI and must be of a sealed unopened bags/packaging, if possible, and supplied as such to the PFI Office.

The PFI Member or consumer will either courier samples to the PFI Office via the Post Office (counter to counter) at their expense, to:

The PFI
P O Box 1027
HILTON
3245

h. or, make arrangements with the PFI Executive to collect the samples.

i. REMINDER: Any concerned pet owner or non-Member may also send samples to the PFI or be advised to do so should problems arise.

j. All costs incurred in this process are refundable from the PFI and should be claimed by presenting the original purchase and postal receipt or invoicing the PFI with the attached proof.

2.2. **Testing**

2.2.1 PFI Executive to select:

a. All suspected problem products.

b. A selection of competitor products.

(Note: Selection to be on a Rotational basis, according to a register, of all PFI Members.)

2.2.2 The PFI Office will number the products whilst in situ according to the PFI numbering system, capture all necessary information off the packaging and take two samples.

a. The PFI Executive will supply one sample, identified by the PFI Number only, directly to an approved laboratory for analysis at the PFI's cost.

b. The remaining product sample (to be retained for 1-year) and the empty bag will be kept for future testing and as a reference sample, pending the results, at the PFI Office.

2.2.3 The type of analysis required is to be requested by the PFI Executive. This will, as a standard, mainly be Protein, Crude Fiber, Crude Fat and Ash for nutritional standard testing. Other tests may be performed upon request, provided there is justification. The standard randomly purchased food by the PFI Office will be analysed via a full NIR. Wet chemistry analysis on the retained sample maybe requested for products showing a degree of non-compliance.

2.2.4 If a PFI Member Company is requested by the PFI Executive, to assist by doing analyses and they agree, these tests are at their own cost.

2.2.5 Results are to be kept confidential and returned to the PFI Executive.

2.3 Evaluation of Data

2.3.1 PFI Executive to collate data.

2.3.2 If doubt exists regarding results, or if results are marginal, the remaining retained sample is to be sent to another approved laboratory for additional testing

2.3.3 Problem products, identified from analysis received, are handled as follows:

If the PFI is satisfied that the results are out of specification for product belonging to non-Members of the PFI, these will be handled on its merits involving either or all of a) or b) or c):

a. Write a letter/e-mail to Act 36 Registrar, registering an official complaint.

b. Write a letter/e-mail to the Company whose product was tested advising them of the testing, the results and the pending notification to the Registrar.

c. Lodge a complaint with the ASA

If the product is from a Member of the PFI, write a letter/e-mail to:

a. The PFI Member Company whose product has been tested, supplying them the full database on their products at the PFI that have been analysed. If there is an analytical non-compliance the retained sample may be sent under a different identification number to the Laboratory for wet chemistry verification.

(NOTE: The PFI will not immediately notify Act 36 Registrar, if the sample is from a PFI Member. The PFI Member is to be given time to rectify the problem as per 3.5 and 3.6 below before notifying the Registrar Act 36 or the ASA)

The letter/e-mail must inform of the results and the problems, actions to be taken if necessary.

Non-Members Product

2.3.4 Contact must be kept with the Act 36/1947 Inspectors to see that there is follow-up on these Companies who are showing non-compliance, should it be decided to follow the route of notifying Act 36/1947. Note if a known contravention of Act 36 exists the PFI is obliged in terms of the Act to advise the Registrar of Act 36

PFI Members Product

2.3.5 A problem Member Company will be given time to rectify its products, and informed that re-sampling will take place. (Samples will be taken, by the PFI Executive, either, in the market place or at the manufacturing plant).

The sample may be tested at any approved laboratory and not necessarily at the original Laboratory

a. If the product is still out of specification after a period of time has lapsed, inform the company that the problem still continues, and request Act 36 to schedule a plant visit. All product at the company to be sampled, tested and reported.

b. If products are found to be out of specification, the company may be asked to submit product samples from product produced for a period of 1 month, to be tested continuously to ensure that it remains within specifications. Act 36 is to be supported in the analyses they require.

c. If the product is found to be continually out of specification, request the Registrar to ensure the product is withdrawn from the market place.

d. If this is not carried out, PFI is to liaise with the Registrar Act 36 to ensure that prosecution is pursued. But if the product is found to be within specification, a written warning must be served.

2.3.6 If the product conforms, on re-testing, no further action will be entered into and the PFI will return to random checking.

2.4 Testing during Step 3 period can be assisted by PFI companies, if permitted, to reduce cost on the PFI.

3. OTHER AVENUES OF PROCESS

Consumer complaints and product claims:

A PFI Member can require that a product test is performed according to the steps outlined above, so as to substantiate consumer complaints or product claims.

Advertising Standards Authority:

Should it be justified in the opinion of the Executive Director he may alert the PFI Directors that he proposes to tackle a problem by reporting it to the ASA. This would be in cases such as no action by Act 36 or to enable a problem that is persisting to be quickly brought into the public domain.

4. PACKAGING, ADVERTISING AND LABEL COMPLAINTS

All complaints with respect to packaging, advertising and label claims, where these do not conform to Act 36 or standard advertising standards, may be brought to the attention of the PFI Executive. Submit samples of the material against which the complaint has been raised, to the PFI. The PFI Executive needs to check that in terms of Act 36 Regulations there is a valid complaint.

a. PFI Members

Where this involves a PFI Member and the complainant is a PFI Member, the complainant can choose to:

(i) first address the complaint directly with the alleged defaulter

or

(ii) request the PFI Executive to address the complaint to the alleged defaulter.

If no positive corrective action is forthcoming or an agreement reached (using reasonable time frames as for specification/analytical complaints) then the PFI Executive must address the complaint in writing to the Act 36 Registrar for his attention and action should the matter be a matter of Act 36 regulation breach. (The PFI Executive has an agreed procedure with the Act 36 Registrar in terms of lodging complaints, follow-up on progress with complaints lodged, and report back on the outcome of the action taken with respect to the complaint) All correspondence to the Act 36 Registrar must be copied immediately to the alleged defaulter.

or

b. Non-PFI Members

A complaint regarding a non-member of the PFI must be brought to the PFI Executive. In this case the PFI Executive will, in writing, inform the Act 36 Registrar of the substance of the complaint directly, and copy this correspondence together with a letter, to the alleged defaulter.

or

Should the matter indicate direct action instead at the Advertising Standards Authority then the PFI Executive will lodge said complaint at the ASA.