

Reference LE2.8

7 June 2012

Food Standards Australia New Zealand
PO Box 7186
CANBERRA BC ACT 2601



Dear Sir /Madam

Submission - Proposal P1018, Companion Dogs in Outdoor Dining Areas

I refer to the above paper and wish to make the following submission in support of the proposed amendment to Section 24, Standard 3.3.2, of the *Australia New Zealand Food Standards Code*, on behalf of the Gladstone Regional Council.

It is noted that the proposal states that three (3) of the states and territories in Australia currently allow the presence of companion dogs in outdoor dining areas, subject to determination by the owner of the food business. It is also noted that the Western Australian Government has introduced enforcement guidelines allowing this to occur if there is no food hygiene risk determined by the food business operator. In Queensland however the requirements have been applied in accordance with the standard. From this perspective there is a clear need for this section to be reviewed and amended to enable consistency to occur across Australia in how regulatory authorities administer this requirement.

From a practical application Queensland with its alfresco environment encourages outdoor dining. Most of this occurs in what would be described as public places, namely sidewalks and shopping precincts. Pedestrian traffic which may include companion animals with their owners are frequently accessing these areas as of right. From this perspective, when considered against the current requirements, there is a literal non-compliance with the standard. Unfortunately, this places a food business operator in a situation that is outside their control, as they are unable to deny access to pedestrians in a public place.

The risk assessment accompanying the proposal states "The potential risk of food borne transmission of zoonotic agents from companion dogs in outdoor dining settings to humans is considered to be very low to negligible". The scientific data reinforces that a more realistic approach needs to be considered and applied to companion animals in this environment. The proposed amendment appears to allow for this and provide the necessary mechanisms required to the food business operator to exclude a customer or animal if an identified public health risk becomes apparent.

Yours sincerely

Brooke Saunders
Manager Regulatory Services