

09 January 2020

**SENATOR AQUILINO PIMENTEL III**

Chairperson

Committee on Trade, Commerce, and Entrepreneurship

Senate of the Philippines

GSIS Financial Complex, Roxas Boulevard

Pasay City, Philippines

Dear **Senator Pimentel**:

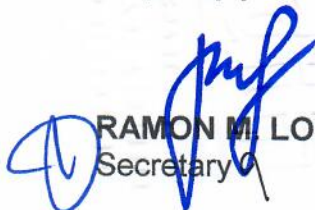
We are pleased to submit the Department's position on Senate Bill No. 922, entitled:

**An Act Informing the Public About Additives in Pet Food**

This is without prejudice to the Department's submission of additional inputs.

With my best regards.

Very truly yours,



**RAMON M. LOPEZ**  
Secretary

**OFFICE OF THE SECRETARY**

DTI Position on

**Senate Bill No. 922**

**An Act Informing the Public About Additives in Pet Food**

The Department supports the objective of the bill of informing the public about additives in pet food and the possible hazards that they may cause in pets. However, we view that an amendment to existing standards may be sufficient to address the concern.

The Department cites Article 27 of Republic Act (RA) No. 7394 or the Consumer Act of the Philippines stating that "any person may, with respect to any intended use of a food additive, file with the Department of Health (DOH) a petition proposing the issuance of a regulation prescribing the conditions under which such additives may be safely used" and that it "may, at any time upon his own initiative, issue a regulation prescribing, with respect to any particular food additive, the conditions under which such additive may be safely used and the reasons thereof, and cause the publication of the same."

The Department expresses its views on certain provisions of the bill, to wit:

| <b>Proposed Provision</b>   | <b>DTI Position/Recommendations</b>  |
|---|--|
| <p>Sec. 2. Requirements for labeling of pet food products. – The following information shall be included in the packaging of pet food products:</p> <p>(A) Ingredients and all additives included in the pet food; and</p> <p>(B) A warning if the additive is a proven carcinogen or is proven to cause detrimental side effects based on standards to be set by the Bureau of Food and Drugs.</p> | <ul style="list-style-type: none"> <li>• The Department notes that there is an existing Philippine National Standard (PNS) for Pet Food Labelling (PNS/BAFS 140: 2014 ICS 65.120) which was initiated by the private sector in collaboration with the Bureau of Agriculture and Fisheries Standards (BAFS) and Bureau of Animal Industry (BAI), both under the Department of Agriculture (DA).</li> <li>• The Department suggests the amendment of PNS/BAFS 140:2014 ICS 65.120 to update it according to international best practices. This would also prevent misleading consumers and avoid making medicinal claims.</li> <li>• Consideration may be given on widening its scope to cover pet food for other pets since current standards only apply to wet and dry pet food being fed to dogs and cats.</li> </ul> |
| <p>Sec. 3. Duty of the Bureau of Food and Drugs. – The BFAD shall provide appropriate and cost-effective method of verification of the accuracy of the information contained in pet food packaging</p>  | <ul style="list-style-type: none"> <li>• We note that the Bureau of Food and Drugs, under the Department of Health (DOH), is now referred to as the Food and Drug Administration (FDA) pursuant to RA No. 9711 or the FDA Act of 2009.</li> <li>• The provision should also include the duties of DA-BAFS and DA-BAI as they are equally involved in pet food packaging.</li> </ul>  |

Given the technical issues at hand, the DTI defers to the knowledge and expertise of the DOH-FDA, DA-BAFS, and DA-BAI in providing further inputs to the proposed measure. The DTI-Bureau of Philippine Standards (BPS) will continue to be involved in the development, promulgation, and implementation of standards for all products in the Philippines and ensure the manufacture, production, and distribution of quality products for the protection of consumers.

  
**Bureau of Trade and Industrial Policy Research**  
**09 January 2020**  
Ref: BTIPR-122019-42

/avmr 