

19 June 2012



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ENVIRONMENTAL
HEALTH AUSTRALIA
(QUEENSLAND)
INCORPORATED
ABN 68 098 814 310

Dear Sir/Madam

**EHA (QLD) INC. SUBMISSION - FSANZ PROPOSAL P1018 - COMPANION
DOGS IN OUTDOOR DINING AREAS**

Environmental Health Australia (Queensland) Incorporated acknowledges the call for submissions on *Proposal P1018 - companion dogs in outdoor dining areas*.

On behalf of EHA (QLD INC, the proposal has been examined by the board and members and the resultant submission is outlined below. The submission additionally canvasses FSANZ for potential funding to develop a best practice guideline with respect to companion dogs in outdoor dining areas.

EHA (QLD) INC Submission

1. Voluntary Admission of Dogs into Outdoor Dining Areas by Food Business Operators

Any change to Standard 3.2.2 must clearly articulate to all food business operators and the public that the removal of the restriction of companion dogs in outdoor dining areas does not result in a mandatory requirement to allow companion dogs in outdoor dining areas.

It is recognised that allowing companion dogs in outdoor dining areas has potential risks to the overall food safety and health and hygiene of the areas, diners and public. This includes:

- potential contamination of food served in this area,
- potential contamination of floors, tables and equipment in the area, and
- potential behavioural issues of the dog which could result in contamination of the above.

It must be clear that an individual business operator or a local government (by inclusion in a local law) may prohibit companion dogs entering an outdoor dining area.

EHA (QLD) INC believe it is essential that the removal of the restriction of companion dogs in outdoor dining areas does not imply a mandatory requirement for food business operators to allow companion dogs in outdoor dining areas. This may result in food business operators being unprepared to manage any potential risks associated with companion dogs in outdoor dining areas and contamination of food, floors, tables, chairs or equipment in the outdoor dining area.

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2. Amendment of Standard 3.2.3

If Standard 3.2.2 is amended to permit companion dogs in outdoor dining areas it is noted that a number of potential risks to food safety will be introduced. Many of these risks can be managed through ensuring dedicated items are used for dogs and that these items are cleaned in facilities separate to the dishwashing sinks used to clean items used in preparing food for human consumption. Therefore, it may be necessary to add a clause to *Standard 3.2.3 – Food Premises and Equipment* requiring separate cleaning and storage facilities be provided in/near food businesses that allow companion dogs in outdoor dining areas. These facilities would not need to conform to the standard for the remainder of the food premises.

3. Acknowledgment of Health Benefits of Companion Animals

EHA (QLD) INC would like to record that there is significant research demonstrating the overall health benefits of companion dogs. This includes the mental health benefits of companionship, physical and wellbeing benefits through an increase of exercise, walking and outdoor activity observed by companion dog owners.

EHA (QLD) INC recommends that these recognised health benefits be acknowledgment and considered in the decision making process for Proposal 1018.

4. Development of Best Practice Guidelines

EHA (QLD) INC advocates that any change to Standard 3.2.2 that removes the restrictions of companion dogs in outdoor dining areas be accompanied with supporting guidelines which support food business operators on minimising risks associated with companion dogs in outdoor dining areas. It is suggested that the guidelines include methods to introduce, monitor and enforce appropriate controls to companion dogs in the outdoor dining area.

EHA (QLD) INC would be like to submit an expression of interest in developing a model 'companion dogs in outdoor dining areas best practice guide/protocol' for food business operators subject to funding and support of Food Standards Australia New Zealand. This guideline would address the risks discussed above while promoting an outcome focused and risk-based approach to the issue consistent with the Food Safety Standards. Any guideline would be developed in consultation with key stakeholders including State wide hospitality industry associations, local governments, State health departments, State dog associations and RSPCA representatives.

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Yours faithfully

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Belinda Davies
President EHA (QLD) INC
(on behalf of EHA (QLD) INC Board of Directors)