



Senate Standing Committee on Rural and Regional Affairs and Transport

Regulatory approaches to ensure the safety of pet food

Submission from the Cat Protection Society of NSW Inc, 17 July 2018

The Cat Protection Society of NSW ('Cat Protection') is a registered charity, caring for cats since 1958.

Our vision is that every cat has a loving and responsible home. Our mission is to work with the community at all levels for the mutual benefit of cats, people and the natural environment.

We operate a best-practice feline shelter; work in partnership with veterinarians to provide community feline health and welfare programs including discounted desexing and vaccination; participate in research and policy about feline health, welfare and wellbeing; as well as providing information and support to thousands of cat owners each year.

We honour the unique bond between people and cats, and we are connected to tens of thousands of cat owners including members of the Society, people engaged with our social media and education activities, adopters of our cats and kittens, volunteers and donors.

Declaration of interest: Cat Protection is sponsored by Hill's Pet Nutrition who provide Science Diet food for the cats and kittens in our shelter. We also retail the Science Diet cat food range.

Cat Protection welcomes the Standing Committee's inquiry into possible regulatory approaches to ensure the safety of pet food, including both the domestic manufacture and importation of pet food.

We make two initial observations: in our experience, the quality of manufactured dry and tinned cat food available in Australia that meets AAFCO guidelines and complies with the Australian Standard for the Manufacturing and Marketing of Pet Food (AS 5812-2017) is generally good. In fact, high quality nutrition, along with vaccinations and the trend to keeping cats confined is helping cats to live longer, healthier and happier lives. The other observation is that most cat owners assume that the manufacture and marketing of pet food in Australia already *is* regulated.

In relation to this, the issue of references b) “the labelling and nutritional requirements for domestically manufactured pet food” and e) “the voluntary and/or mandatory recall framework of pet food products” are particularly relevant.

From a consumer perspective, cat owners (all pet owners) reasonably expect that pet food is safe, appropriate to the nutritional needs of the species, properly manufactured and accurately labelled. Furthermore, they reasonably expect that if any pet food is not, that there are regulatory systems in place which would identify this and take appropriate action, including mandatory recall.

We note that the framework for identifying potential pet food safety/adverse events in Australia is voluntary and depends on reports by veterinarians. In contrast, in the United States the FDA provides an online portal that allows consumers to directly submit information concerning problems identified with pet food (<http://www.safetyreporting.hhs.gov/>).

Cat Protection would always recommend any sick animal is seen by a veterinarian as soon as possible. However, an animal does not have to become sick for a consumer to notice a problem with pet food. For example, the presence of foreign objects in the food or issues with packaging might be observed so the food is not fed to the pet. This is good for the animal’s health but might also mean no notification is made of the problem, hindering surveillance. Also, there can be instances where no symptoms are observed in a pet who dies suddenly. The owner might attribute this to natural causes and thus again, there is no veterinary notification. Opportunities to monitor quality standards ought to be maximised in order to capture as much data as possible, therefore, we recommend a capacity for direct consumer reporting.

With respect to labelling and nutritional requirements, Cat Protection always recommends that cat owners choose food that is recognised as nutritionally complete and balanced according to AAFCO guidelines. Once again, we would highlight the regulatory framework in the United States which is underpinned by the FDA (www.fda.gov/AnimalVeterinary/ResourcesforYou/ucm047111.htm) and supported by AAFCO (<http://www.aafco.org>).

AAFCO guidelines recognise the species-specific nutritional needs of pets. The importance of taurine to feline health is well-documented and understood by veterinarians but the unique feline metabolism is not so well known by consumers. Over just a short period of time, taurine deficiency can affect a cat’s health and over a period of just several weeks can cause irreversible blindness or even death. Nutritionally complete and balanced *cat* food is therefore vital for cats.

In both cats and dogs, thiamine (Vitamin B1) deficiency causes severe neurological symptoms and can be fatal. The use of sulphur-based preservatives to maintain an appealing colour in ‘fresh pet meats’ inhibits thiamine absorption (and can also trigger asthma in cats). A diet high in sulphur-based preservatives will lead to clinical thiamine deficiency. While veterinarians and animal welfare organisations have tried to alert the pet-owning public to this very serious risk, manufacturers of pet meat are not regulated so there is no mandatory requirement to mitigate this potentially fatal hazard, either by manufacturing standards or warning labels on the packaging.

Additional concerns have been identified with respect to fresh pet meats. A recent Dutch study identified the presence of potential zoonotic pathogens in frozen raw meat-based diets, and the potential for parasitic infection from non-frozen pet meats (van Bree et al, “Zoonotic bacteria and parasites found in raw meat-based diets for cats and dogs”, *Vet Record*, 2018 Jan 13)

Another Dutch study – “Raw pet food as a risk factor for shedding of extended-spectrum beta-lactamase-producing *Enterobacteriaceae* in household cats” (Baede et al, *PLOS One*, November 2, 2017) – identified a raw meat-based diet as a risk factor in transmission of antimicrobial resistant organisms.

These findings highlight the need to examine the regulation of pet food in a One Health framework. The development of a “nationally coordinated One Health surveillance of antimicrobial resistance and antimicrobial usage” is an objective of the Australian Government’s National Antimicrobial Resistance Strategy 2015-2019. Pet food ought to be a part of that consideration: the entire cycle; from production to manufacture, marketing and consumption.

Given the important relationship that people have with their pets – two-thirds of households with pet dogs and cats regard them as a part of the family (Animal Medicines Australia *Pet Ownership in Australia 2016*) – it is appropriate to broaden consideration from merely ‘One Health’ to ‘One Welfare’. When people’s pets suffer, then people suffer also. Pet owners are for the most part animal lovers, and would also be concerned about the welfare standards of production animals, as well as health and biosecurity issues.

The pet food industry is economically important. It has a significant role to play in the health, welfare and wellbeing of animals *and* people, and its regulation is therefore necessary. Cat Protection recommends that such regulation is developed in a One Welfare framework.

Cat Protection thanks the Senate Standing Committee on Rural and Regional Affairs and Transport for the opportunity to contribute to its inquiry.

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