

Regulatory Approaches to Ensure The Safety of Pet Food

Summary

As an owner of a dog with oesophageal dysfunction as a result of feeding Advance Dermocare I would like to see regulatory approaches to ensure the safety of pet foods in Australia.

I recommend adding pet food products to Food Standards Australia New Zealand's existing statutory authority for human food products. This would ensure clear and consistent labelling of pet food. I also recommend pet food products adopt the voluntary and mandatory recall framework (Standard 3.2.2) by Food Standards Australia New Zealand for human food products. This would enable one statutory authority to over see food standards across both human and pet foods for Australia and New Zealand.

Background

Our dog is one of the dogs affected by the recent recall of Advance Dermocare range of dog food.

Our dog became symptomatic in February 2017 with recurrent regurgitation, which progressively became worse over the next 7 weeks. Our dog was tired, lethargic and was struggling to keep food and water down, often regurgitating up to 6 times per day.

Our dog was exclusively fed Advance Dermocare from February 2017 and underwent an endoscopy in April 2017, which revealed he had developed severe oesophagitis. We commenced aggressive treatment for oesophagitis giving our dog four varieties of medications, seven times a day. Our dog showed symptom improvement with medical management, however when we tried to wean him off his medications his symptoms would reoccur.

Our dog was then referred to The University of Sydney Veterinary Hospital for further investigation for the underlying cause of his recurrent regurgitation and oesophagitis. While at Sydney University he underwent blood tests ruling out diseases such as Addison's disease and other endocrine conditions and had a fluoroscopy showing mild reflux (was on 1 variety of PPI when tested). Our dogs' Internal Medicine Specialist recommended further tests including an abdominal ultrasound under sedation and repeating the endoscopy procedure with biopsies of our dogs' digestive system. Prior to these tests it was recommended trialling an elimination diet to determine whether food hypersensitivity or allergies were causing our dog's recurrent regurgitation and oesophagitis.

We commenced feeding our dog exclusively on Royal Canin hypoallergenic food, (hydrolysed soy protein range of food that is the least unlikely to trigger allergic reactions in dogs) to determine whether our dog was reacting to the Advance Dermocare range of dog food, we ceased PPI medication for the duration of the trial.

After just over 1 week on an elimination diet our dog's symptoms disappeared for a month. After a one-month trial on a strict hypoallergenic elimination diet and becoming asymptomatic we challenged our dog with Advance Dermocare to determine whether he was reacting to his usual food. Within days our dogs' symptoms reoccurred. We then re-challenged to make sure it wasn't a chance reaction and his regurgitation started again. We then knew our dog had had a definite reaction to his food, Advance Dermocare.

I contacted Advance via their customer service line multiple times in August 2017 about our dog's reaction, however did not receive a response until I posted a question via Facebook messenger in September 2017 saying that our dog had reacted to Advance Dermocare and requesting a list of all the protein containing ingredients in Advance Dermocare. I received a response after 8 days via Facebook messenger and a follow-up phone call.

At the time we suspected our dog was allergic to one of the proteins in Advance Dermocare so we started controlled challenges on the proteins in Advance Dermocare (tuna, sardines, chicken, maize) (we did not challenge rice as he had not reacted to the Royal Canin hypoallergenic food containing rice).

Advance were aware our dog had had a reaction to Advance Dermocare in September 2017, however they are reporting that they had no knowledge of dogs being affected by their product until December 2017, when the police dogs were affected.

Our dog has been diagnosed with eosinophilic oesophagitis as a result of the oesophageal dysfunction caused by Advance Dermocare. Eosinophilic oesophagitis is a chronic relapsing disease requiring ongoing treatment to manage symptoms and we are unsure how this condition will affect our dog for the rest of his life.

Once Advance Dermocare was recalled in March 2018 we received an offer of consideration for reimbursement for our dog's vet bills. However, when speaking with Advance they have refused to reimburse our dog's vet bills and cover the costs of managing his condition for the rest of his life, as his case does not fit Mar's reimbursement criteria.

It is my and our vets belief that our dog would have gone onto develop megaesophagus had we not ceased our dog consuming Advance Dermocare in July 2017. Since becoming symptomatic in late February 2017 our dog had developed severe oesophagitis by April 2017 and chronic inflammation can lead to megaesophagus development.

I would like to see the pet food industry in Australia regulated so that a situation, like what has occurred with Advance Dermocare, never happens again. Regulation of labelling, nutrition claims and recall frameworks for pet food products are needed to protect our pets.

Mars were aware of our dogs' reaction to Advance Dermocare in September 2017, with the police dogs being reported in December 2017. If Mars were to have acted sooner and voluntarily recalled Advance Dermocare in December 2017, it would have prevented over 100 dogs developing megaesophagus.

Possible regulatory approaches to ensure the safety of pet food, including both the domestic manufacture and importation of pet food, with particular reference to:

The labelling and nutritional requirements for domestically manufactured pet food

Pet food products in Australia do not have clear labelling and it is difficult for consumers to determine what exactly is in their pet's food. Our dog's condition requires him to follow a strict gluten and wheat free diet for the rest of his life to prevent his oesophagus from having an allergic inflammatory response, if our dog's condition were to be left untreated it would lead to permanent damage to his oesophagus.

When we have questioned the ingredients used in our dog's food we have had to contact pet food manufacturers directly to obtain the required information as it is often not included on food labels or is unclear.

This issue is not only isolated to pet food, but also pet medications such as flea, tick and worming. The ingredients within these medications are withheld from consumers, and manufacturers will not reveal their ingredients as I have been told it is their intellectual property. After explaining our dogs' condition to drug manufacturers e.g. Bayer, Merial/Boehringer Ingelheim, Merck they have been willing to provide the information we require, however it is not readily available.

The labelling of 'grain free' and 'gluten free' pet foods in Australia is also misleading. Under Australia New Zealand Food Standards Code – Standard 1.2.8 "gluten means that main protein in wheat, rye, oats, barley, triticale and spelt" however I have seen many pet foods marketing their product as gluten free or grain free containing oats. Oats are not classified as gluten free due to being processed with other gluten containing grains and exposed to gluten contamination during the manufacturing process. Under Standard 1.2.8:

"A claim to the effect that a food is gluten free must not be made in relation to a food unless the food contains –

- (a) No detectable gluten; and no –
 - (i) oats or their products; or
 - (ii) cereals containing gluten that have been malted, or their products

I would recommend regulating nutrition claims for pet foods, so that they are in line with nutrition claims for human foods. A streamlined process of nutrition claims and labelling across both human and pet food products should be considered to minimise confusion.

If clear labelling and ingredients lists were mandatory it would make it much easier for consumers to make informed decisions on what exactly they are feeding their pets. I recommend labelling of domestically manufactured pet food being consistent with Australia New Zealand Food Standards Code - Standard 1.2.8 - Nutrition Information Requirements.

The management, efficacy and promotion of the AVA-PFIAA administered PetFAST tracking system

We were able to prove our dogs' recurrent regurgitation from consuming Advance Dermocare after placing our dog on a hydrolysed protein elimination diet. Once we had proved cause (Advance Dermocare) and effect (recurrent regurgitation) we contacted Mars directly in August and September 2017 to inform them of our dogs' reaction to their Advance Dermocare product.

I was not aware of the PetFAST tracking system to report our dog's reaction to, until after Advance Dermocare was voluntarily recalled in March 2018. I would recommend an extension of Food Standards Australia New Zealand authority to coordinate recall action.

In the case of the voluntary recall of Advance Dermocare in March 2018 I would recommend a mandatory recall framework, like with food, where the Commonwealth Minister responsible for consumer affairs and the State and Territory governments having the legislative power to order a food product recall where a serious public health and safety risk exists. Had this legislative power been in place it may have led to Advance Dermocare being recalled sooner and less dogs being affected with oesophageal dysfunction/megaoesophagus for the rest of their lives.

The feasibility of an independent body to regulate pet food standards, or an extension of Food Standards Australia New Zealand's remit

I would recommend an extension of Food Standards Australia New Zealand's remit to regulate pet food standards in Australia. The framework and standards already exist for humans, this would be an extension of existing standards relating to pet foods. This option would enable one statutory authority to oversee food standards across both human and pet foods for Australia and New Zealand. This code would then be enforced across pet foods, as it is for human foods. This option would minimise confusion and allow Food Standards Australia New Zealand to apply the same standards for human food products to pet food products.

The voluntary and/or mandatory recall framework of pet food products

Recommend pet food products adopt the voluntary and mandatory recall framework (Standard 3.2.2) by Food Standards Australia New Zealand for human products.

In the case of the voluntary recall of Advance Dermocare in March 2018 I would recommend a mandatory recall framework should be put in place to prevent similar issues occurring again. As it exists for human food products, the Commonwealth Minister responsible for consumer affairs and the State and Territory governments should have the legislative power to order a food product recall, whether human or pet food, where a serious public health and safety risk exists. Had this legislative power been in place it may have led to Advance Dermocare being recalled sooner and less dogs being affected with oesophageal dysfunction/megaesophagus for the rest of their lives.

The interaction of state, territory and federal legislation

Recommend the Food Standards Australia New Zealand Act 1991 be enforced for pet food products, as it is with human products. Under this Act Food Standards Australia New Zealand at the request of States and territories, is responsible for coordinating recall action.

Comparisons with international approaches to the regulation of pet food

In the United States of America the Food and Drug Administration successfully regulates pet food as it does for human food. Adopting a system similar to the United States of America, where Food Standards Australia New Zealand is the overseeing organisation would allow the implementation of strict food standards and regulations for Australian and New Zealand pets in the future.

Regulation by Food Standards Australia New Zealand would help to ensure there are adequate recall frameworks in place to prevent what has occurred to the extent with Advance Dermocare from occurring in Australia again. It would ensure uniform regulations across both human and pet food products and would help ensure the food we are providing our pets is safe for consumption.