

26th June 2018

Dear Senator/Committee,

RE: Submission of Regularly Approaches to Ensure the Safety of Pet Food

I have a background in Veterinary Care and Holistic Pet Nutrition and decades of experience with both domestic and wildlife animals.

Australian pets have been for decades and currently are fed with low-grade toxic commercial pet foods both tinned, dry (known as kibble/biscuits) treats and raw kangaroo pet mince preserved with toxic sulphites.

Many of the commercial pet foods are imported from USA into our supermarket chains; Coles, Woolworths, IGA and Aldi which follow suit to the American Standards of Pet Foods which lack considerable safety standards harbouring offensive ingredients which can cause both acute and chronic illness, disease and fatalities.

Pet Treats are also imported from China and Asian countries where dangerous toxins are present on them also inflicting both acute and chronic illness, disease and fatalities.

Raw Kangaroo meat is abundant in pet foods containing serious dangerous preservative Sulphites that can cause fatality especially in felines (cats). Regardless of the added thiamine B1 which is also a synthetic carcinogenic toxic compound to try to resolve the sulphites destroying the naturally occurring thiamine B1 in kangaroo meat. The singular added thiamine B1 is not 'part of the matrix' of the meat and as an added substitute does not assimilate bio-availability to the feline and the canine.

It is with growing grave concern for our beloved pets food safety consumption that has led me to this submission. Commercial pet foods are cooked at temperatures between 200-400 degrees that leaves it completely non-biologically available for our cat and dog to consume, digest, metabolise and excrete efficiently regardless of the food being completing species-inappropriate as cats and dogs are not biologically designed by nature to consume and digest and metabolise and excrete high starchy carbohydrates, rendered trans fatty acids (carcinogenic fats), refined sugars, synthetic compounded additives, GMO ingredients, legumes (grain-free even higher starch and sugars), and all other ingredients unlisted little to the pet consumers knowledge.

My submission here is to demand a change in the pet food industry. The change must constitute a new legislation that promotes and protects our cats and dogs from ingesting harmful ingredients which cause illness, disease and death. **My submission demands that our pet food products all must be labelled "fit for human consumption"** as it makes logical sense currently the labels say unfit for human consumption which is a warning to humans not to ingest as it is of a hazardous substance and must be avoided.

I also demand that Kangaroo raw meat and kangaroo cooked meat in the pet food industry be banned from sale as from a health and safety aspect the meat is of high risk due E-Coli referenced by ABC
<http://www.abc.net.au/news/rural/2014-08-18/kangaroo-meat-ban/5677656>

The Following are references for your information:

How is the pet food industry regulated in Australia?

REF: http://kb.rspca.org.au/how-is-the-pet-food-industry-regulated-in-australia_609.html

Pet food is essentially self-regulated with voluntary industry standards applied through the Pet Food Industry Association of Australia (PFIAA). In 2011 the industry code of practice was replaced with the Australian Standard for the Manufacturing and Marketing of Pet Food (AS 5812–2011), which has since been updated to the Australian Standard (AS 5812-2017) for the Manufacturing and Marketing of Pet Food.

RSPCA Australia worked with other key stakeholders to develop the Australian Standard for the Manufacturing and Marketing of Pet Food (AS 5812–2017). RSPCA Australia was also represented on the Primary Industries Ministerial Council Pet Food Controls Working group.

A number of pet food product safety incidents over the previous years have raised some concerns about pet food safety. A longstanding pet food/pet meat safety issue in Australia relates to the use of sulphur dioxide and sodium and potassium sulphite preservatives. These can cause thiamine (Vitamin B1) deficiency, which can be fatal. Products specifically marketed for pets such as commercial 'pet meat'; 'pet mince' or 'pet food rolls' may contain sulphite or potassium sulphite preservatives that liberate sulphur dioxide.

Thiamine (Vitamin B1) deficiency can occur when dogs and cats are fed on a diet containing sulphite preservatives. Thiamine deficiency causes severe neurological symptoms and can be fatal. For decades, sulphite preservative induced thiamine deficiency has been frequently recognised by the Australian Veterinary profession.

The Australian Standard for Manufactured Pet Food AS 5812 contains clauses that address the sulphite issue by including a mandatory requirement that any product containing sulphur dioxide, sulphite or potassium sulphites must contain sufficient thiamine according to AAFCO guidelines, for the entire shelf-life of the product. This will help to prevent thiamine deficiency in relation to pet food/pet meat that complies with AS5812.

However, RSPCA Australia still has concerns about 'pet meat' products and any other product that does not voluntarily comply with the Australian Pet Food Standard AS5812 in relation to the use of sulphite preservatives.

Regulations for 'pet meat' products are currently inadequate. Pet meat manufacturers must ensure they take steps to safeguard pets from thiamine deficiency by ensuring that any product containing sulphur dioxide, sulphite or potassium sulphites contains sufficient thiamine according to AAFCO guidelines, for the entire shelf-life of the product. This is the requirement for any pet food product that complies with the Australian Pet Food Standard and should be the requirement for any 'raw pet meat' products or any other food intended for cats and dogs.

REF: Daily Telegraph Pets Left Brain Damaged

<https://www.dailytelegraph.com.au/news/nsw/fresh-pet-food-is-poisoning-animals-and-could-leave-them-brain-damaged-vets-warn/news-story/afe362774e9120f74da4e2e61b537f27>

Dangerous Treats from China and Asian Origin

REF: http://kb.rspca.org.au/what-should-i-know-before-feeding-dog-treats_621.html

REF: <https://www.fda.gov/animalveterinary/safetyhealth/productsafetyinformation/ucm360951.htm>

A number of Australian dogs have suffered from kidney problems after being fed particular pet treats.

The toxin which causes the illness has not been identified and a number of treats from a number of manufacturers could be involved. Researchers have said that it's difficult to pinpoint the particular treats involved because dog owners often feed several different treat brands to their dogs.

Cases have been associated with some chicken jerky treats, pig's ears and other porcine products in addition to some chew-type products, mostly but not exclusively of Asian origin.

If you want to feed treats, veterinary researchers advise to use:

- *a small portion of commercial dog food; or*
- *an appropriate and safe morsel of human food; or*
- *home-made treats prepared under veterinary advice*

If you are using commercial treats, then it would be wise to limit these to occasional use, for example, a small treat once or twice a week.

If you are feeding commercial treats and notice your dog showing the following signs/symptoms then you should see your vet as soon as possible:

- *lethargy*
- *inappetance*
- *increased thirst*
- *urinating more frequently*

According to research, the illness is normally treatable with most dogs making a recovery if treats are removed from diets completely. But very occasionally more serious illness and death can occur.

The cases seen are mostly in small dogs.

We suggest that you talk to your veterinarian for more information.

REF: Supermarket Brands can cause Serious Illness Study Finds

<http://www.abc.net.au/news/2016-03-21/some-supermarket-cat-food-brands-may-cause-severe-illness-study/7263634>

Some supermarket cat food brands may cause 'severe illness', study finds

By the National Reporting Team's [James Thomas](#) and [Alison McClymont](#)

Updated 21 Mar 2016, 5:33pm

PHOTO: [The study did not identify any of the brands it said may harm cats.](#) (ABC News)

A number of commercial pet food brands sold in supermarkets may cause "severe illness or injury" to adult cats, a Sydney University study has found.

Key points:

- *Study finds some supermarket and pet shop cat food brands may cause lameness, diabetes, obesity or anaemia*
- *Out of 20 products tested eight products did not meet Australian nutritional standards*
- *The authors of the study will not release the names of the brands*

The peer reviewed study, published in the Australian Veterinary Journal, tested 20 supermarket or pet store products.

Nine of them did not adhere to the Australian standards in regards to their "guaranteed analysis" claims.

Eight products did not adhere to the standards in regards to nutrient content for adult cats because they had too much, or too little, protein and fat.

The study found some of these products could cause lameness, diabetes, obesity or anaemia.

Neither the authors of the study, the University or the Australian Veterinary Journal would release the names of the offending brands of pet food.

Even the \$2 billion-a-year pet food industry is calling for the release of the products' names.

Duncan Hall from the Pet Food Industry Association said: "We do want to know more. We have flagged it with members."

"Of course we have concerns with regards to findings where the nutrient levels are not what is expected, and certainly the degree of some of those changes are a surprise," he said.

Do you know more about this story? Email investigations@abc.net.au

The study has also left some of Australia's two million cat owners wanting the brand names made public.

"If they've found something wrong with a particular food, well yes, they should be named and the people then have a choice to go with that company," said Sydney cat owner Matthew Geftakis.

PHOTO: [Experts say they need to know which brands are safe for cats.](#) (ABC News: Kathryn Ward)

Anne Jackson, editor of the Australian Veterinary Journal, told the ABC the study was only "preliminary" and "cannot be relied upon until confirmed by large, formal trials".

She said that was why "it would be inappropriate for the authors to include the names of the companies".

The University told the ABC it was a pilot study led by a master's student and completed as part of her thesis.

"It would be both inappropriate and irresponsible to name the commercial companies involved until the results are replicated in a full-scale study using much larger sample sizes," wrote the University's media manager, Verity Leatherdale.

In fact while the study was led by a master's student, the three co-authors include internationally renowned professor David Raubeheimer.

Withholding brand names 'absurd'

Sydney veterinarian Tom Lonsdale, a fierce critic of the pet food industry, does not agree with the University's reasoning.

PHOTO: [Dr Lonsdale said Sydney University appeared to be backing away from its research.](#) (ABC News: James Thomas)

"That's absurd. If they were going to stand by what they wrote then they would be prepared to publish the names," Dr Lonsdale said.

Dr Lonsdale, who is a proponent of raw food diets, said the university seemed to be backing away from its research.

"It's ridiculous now to start to denigrate their own research project," he said.

"I mean they must have spent endless hours in the lab and quite a lot of money and then gone through the peer review process to make sure this is kosher or authentic and fit for public consumption.

"So for them to now turn around and say, 'well actually we don't stand by our own work' is absurd."

'Vets need to know what is safe for animals'

Sue Foster, adjunct senior lecturer at Murdoch University and an internationally respected feline specialist added: "If the methodology is completely robust, then I couldn't personally see a great reason for not releasing those names."

The only plausible thing to me is they haven't been named because they want to make people worried about buying pet food from the supermarkets and pet shops.

Richard Malik, feline specialist

Dr Foster said the scale of a study was irrelevant to its validity, and protecting company names when animal welfare was at risk was a concern to vets, who need to know what is and is not safe for their customers.

Even one of Sydney University's own academics, Richard Malik, a feline specialist, has serious concerns that the published cat food study has omitted the names of products tested to protect commercial arrangements with pet food companies such as Hills and Royal Canin.

"The only plausible thing to me is they haven't been named because they want to make people worried about buying pet food from the supermarkets and pet shops," Dr Malik explained.

Dr Malik said not releasing the names cast doubt over every supermarket brand, forcing vets to recommend only the expensive, premium cat foods — the same "premium foods made by the companies that have these [sponsorship] relationships with all the universities in Australia".

The University of Sydney said the cat food study "did not receive any commercial funding" and denied suggestions researchers received any benefit from the pet food industry in relation to this study.

Sponsorship between university, pet food companies revealed

Doctor Tom Lonsdale said that was not the case.

"I don't think they are at liberty to deny that, because it's in the documents," he said.

Using freedom of information, Dr Lonsdale said he uncovered extensive sponsorship arrangements between pet food companies Hills and Royal Canin and the University of Sydney.

In addition to organising and paying for conferences, free lab coats for students, and subsidised pet food for the uni vet clinic, the university also agreed to provide Hills Pet Food with "Research Engagement with Charles Perkins Chair in Comparative Nutrition".

The Charles Perkins Chair in Nutritional Ecology is comparative nutritionist Professor David Raubenheimer, one of the four authors of the study. He is also a globally recognised scientist.

In a statement to the ABC, the University of Sydney said "Hills did not proceed" with engaging Professor Raubenheimer in any research.

Pet food sponsorship had no bearing on study: university

The university also maintains that its pet food sponsorships had nothing to do with the cat food study and had no bearing on it.

The university was answering on behalf of the authors.

Dr Malik remains sceptical and believes the university's pet food sponsorship should cease.

"The problem is, the universities don't have enough money and they are trying to do whatever they can," he said.

"In this particular case the pet food manufacturers are generous in their money. And you get something back for it: you get influence."

The pet food industry does not see it that way.

"It is my understanding that individual companies do have arrangements with universities with regards to supporting activities, continuing education, bringing out speakers that otherwise wouldn't come out here, and I think that is a good thing," said Duncan Hall from the Pet Food Association.

Thank you for reading my submission. I hope you accept this as I have not done one before.

Sincerely Yours,

Eve Wetherell

Senate Standing Committees on Rural and Regional Affairs and Transport

Role of the Committee

Following an order of the Senate on 13 May 2009, the Senate's eight legislative and general purpose standing committees each now comprise a pair of committees: A **Legislation Committee** whose purpose is to deal with bills referred by the Senate, the Estimates process and oversee the performance of departments, including their annual reports, and a **References Committee** whose purpose is to deal with all other matters referred by the Senate.

This reverts to a system that was in place between 1994 and 2006 when the eight legislative and general purpose standing committees of the Senate each had a legislation and a references committee. The committees will be governed by [Senate Standing Order 25](#).

Standing order 25 provides for the appointment of a legislative and general purpose standing committee on Rural and Regional Affairs.

Information on the establishment, role and powers of Senate committees can be found in [Chapter 5](#), in the Standing Orders of the Senate.

The committee has had the following name changes in recent Parliaments:

- 8 February 2012 — Rural and Regional Affairs and Transport
- 2010 - 8 February 2012 — Rural Affairs and Transport
- 1994–September 2010 — Rural and Regional Affairs and Transport
- Pre 1994 — Rural & Regional Affairs

The Rural and Regional Affairs and Transport portfolio coverage includes:

- Agriculture and Water Resources
- Infrastructure and Regional Development

Regulatory approaches to ensure the safety of pet food

On 20 June 2018, the Senate moved that the following matters be referred to the Rural and Regional Affairs and Transport References Committee for inquiry and report by **30 August 2018**.

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

- a. the uptake, compliance and efficacy of the Australian Standard for the Manufacturing & Marketing of Pet Food (AS5812:2017);
- b. the labelling and nutritional requirements for domestically manufactured pet food;
- c. the management, efficacy and promotion of the AVA-PFIAA administered PetFAST tracking system;

- d. the feasibility of an independent body to regulate pet food standards, or an extension of Food Standards Australia New Zealand's remit;
- e. the voluntary and/or mandatory recall framework of pet food products;
- f. the interaction of state, territory and federal legislation;
- g. comparisons with international approaches to the regulation of pet food; and
- h. any other related matters

Submissions should be received by **20 July 2018**.

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