

Chapter 2

Pet food incidents

2.1 This chapter discusses a number of recent pet food safety incidents that have occurred in Australia and overseas. It includes a recent cluster of megaesophagus cases in dogs that had consumed commercial dry dog food, as well as incidents relating to thiamine deficiency, irradiation, kidney disease, and the chemical and physical contamination of pet foods. The chapter also considers the impact that these events have had on pet owners.

Megaesophagus cases

2.2 Since 2017, there have been over 100 confirmed cases of megaesophagus in dogs that consumed Advance Dermocare dry dog food. In eight cases, the condition was considered so severe that the dogs had to be euthanased.¹

2.3 Megaesophagus is a condition whereby the oesophagus becomes enlarged and loses its elasticity. Animals with megaesophagus lose the ability to move food down to their stomach and must be fed upright so the food does not get stuck in the oesophagus. Megaesophagus cannot be reversed, and treatment is essentially supportive. A large number of submitters presented evidence to the inquiry which detailed their personal experiences of caring for a pet with megaesophagus. The long-lasting impacts of this condition, on both pets and their owners, are discussed further in Chapter 4.

Timeline of events

2.4 On 28 December 2017, Mars Petcare, the manufacturer of Advance Dermocare dry dog food received notice, through its customer care line, that a number of police dogs in Victoria had been diagnosed with megaesophagus.² That month, Mars Petcare commenced testing of Advance Dermocare products in its Bathurst factory to search for metals, pesticides and potential neurotoxins, all of which are known to trigger megaesophagus. In total, 160 different potential toxic agents were tested.³ However, global advisers were unable to establish a causal link between Mars' dry dog food range and the symptoms associated with megaesophagus through these examinations. While Mars continued its own testing to support Melbourne

1 Angelique Donnellan, 'Dozens of dogs confirmed sick in investigation into popular dog food Advance Dermocare', *ABC News*, 30 April 2018, <http://www.abc.net.au/news/2018-04-30/popular-dog-food-suspected-of-making-dogs-sick-advance-dermocare/9699866> (accessed 25 June 2018). Also see: Angelique Donnellan, 'Pet food industry in the spotlight as number of megaesophagus cases jumps', *ABC News*, 6 June 2018, <http://www.abc.net.au/news/2018-06-06/number-of-megaesophagus-cases-soar-advance-dermocare/9839982> (accessed 25 June 2018).

2 Mr Barry O'Sullivan, Mars Petcare Australia, *Committee Hansard*, 29 August 2018, pp. 21–23.

3 Dr Roger Bektash, Mars Petcare Australia, *Committee Hansard*, 29 August 2018, p. 32.

University's U-Vet Animal Hospital, in early 2018, U-Vet became the lead investigator.⁴

2.5 Throughout January and February 2018, liaison between Mars Petcare, Victoria Police and the University of Melbourne continued.⁵ While the nature of these discussions was not made clear to the committee, it is understood that U-Vet continued its investigation on behalf of Victoria Police.

2.6 On 8 March 2018, the AVA contacted its members to ensure that vets around the country were aware of the existing megaesophagus cases, and to seek information on behalf of the University of Melbourne's U-Vet clinic. The clinic was interested in cases of laryngeal paralysis or megaesophagus in dogs which did not have an underlying medical diagnosis. Dogs showing symptoms since September 2017 were of particular interest.⁶

2.7 Throughout March 2018, further reports of megaesophagus in dogs were reported. This included a number of correctional services dogs in South Australia, as well as two household dogs. On Saturday 24 March 2018, Mars Petcare announced a voluntary recall of Advance Dermocare dry dog food.⁷ The recall announcement was published on the PFIAA website that afternoon, and was included on both its public site and its exclusive members section. The following day (25 March), the PFIAA sent a newsletter alert to all 160 registered members to advise them of the recall.⁸

2.8 On Monday 26 March 2018, a teleconference involving representatives from AVA and PFIAA took place to consider the recall.⁹ The same day, the AVA published a media statement relating to the product recall and associated cases of megaesophagus.¹⁰ Further information about megaesophagus was published on the AVA website on 28 March 2018.¹¹

4 Mr Barry O'Sullivan, Mars Petcare Australia, *Committee Hansard*, 29 August 2018, p. 21. Also see: Angelique Donnellan, 'Dozens of dogs confirmed sick in investigation into popular dog food Advance Dermocare', *ABC News*, 30 April 2018, <http://www.abc.net.au/news/2018-04-30/popular-dog-food-suspected-of-making-dogs-sick-advance-dermocare/9699866> (accessed 25 June 2018).

5 Mars Petcare Australia, *Dermocare recall timeline* (tabled at a public hearing on 29 August 2018).

6 Australian Veterinary Association, *AVA alerts and communication with members*, 8 March 2018 (tabled by Ms Rach Dola at a public hearing on 28 August 2018).

7 Mars Petcare Australia, *Dermocare recall timeline* (tabled at a public hearing on 29 August 2018).

8 Pet Food Industry Association of Australia, *Submission 130 – Attachment 2*, pp. 1–3.

9 Pet Food Industry Association of Australia, *Submission 130 – Attachment 2*, pp. 1–3.

10 Australian Veterinary Association, 'AVA advises dog owners to seek veterinary help if concerned about their pet's health', *Media statement*, 26 March 2018, <https://www.ava.com.au/node/101842> (accessed 31 August 2018).

11 Australian Veterinary Association, 'An update from AVA on reports of Megaesophagus in dogs', *Media statement*, 28 March 2018, <https://www.ava.com.au/node/101911> (accessed 31 August 2018).

2.9 The committee was informed by a number of witnesses that the investigation by the University of Melbourne U-Vet clinic is ongoing, and the root cause of the spate of megaesophagus cases had not yet been identified.¹² Associate Professor Caroline Mansfield, Director of U-Vet has led the investigation into the association between megaesophagus and Advance Dermocare on behalf of Victoria Police, which will make the decision as to whether to release the report to the public. The committee sought a copy of the report but it was not made available to it before the inquiry concluded.

2.10 It should be noted, however, that in May 2018, U-Vet confirmed megaesophagus in 74 dogs, all of whom had consumed Advance Dermocare dry dog food.¹³ The committee understands that the number of dogs diagnosed with megaesophagus has subsequently risen and that the dogs were reported to have consumed Advance Dermocare. On the evidence available to the committee, it would appear that there is a strong association between megaesophagus and Advance Dermocare dry dog food. The committee believes that this association will be confirmed in the Victoria Police report.

Megaesophagus cases in Latvia

2.11 The Latvian series of megaesophagus cases occurred during 2014–16. Submitters highlighted that the Latvian regulatory context for these cases was similar to Australia in that pet food standards in Latvia were not enforced and the recall system was entirely voluntary.¹⁴

2.12 The Latvian Association of Veterinarians (LAV) informed the committee that in April 2015, the state veterinary department (SVD) noticed a 10-fold increase in the number of cases of the disease. It found that approximately 95 per cent of the 70 dogs registered with megaesophagus were being fed the same commercial diet that was manufactured locally in Latvia.¹⁵

2.13 According to the LAV, even though the number of registered cases continued to increase, the SVD resisted the call to conduct an epidemiological investigation. The view of the SVD was that it did not have a legal obligation to conduct such an investigation, given that dogs were not recognised as 'productive' animals and that megaesophagus was considered unlikely to be caused by an infectious agent.

12 Mr Barry O'Sullivan, Mars Petcare Australia, *Committee Hansard*, 29 August 2018, p. 21. Also see: Associate Professor Caroline Mansfield, *Committee Hansard*, 29 August 2018, p. 10.

13 Tim Wall, '74 megaesophagus cases linked to Australian dry dog food', *Pet Food News*, 2 May 2018, <https://www.petfoodindustry.com/articles/7165-megaesophagus-cases-linked-to-australian-dry-dog-food?v=preview> (accessed 15 October 2018).

14 See, for example: Dr Ilze Matise-VanHoutan, *Submission 95*, p. 2; Australian Veterinary Association, *Submission 68*, p. 6; Ms Maria Kuljanic, *Submission 142*, pp. 6–9 and Latvian Association of Veterinarians, *Submission 121*, pp. 1–2.

15 Latvian Association of Veterinarians, *Submission 121*, p. 1. Also see: Dr Ilze Matise-VanHoutan, *Increased incidents of megaesophagus in dogs in Latvia 2014–2016*, February 2016, https://www.kleintiermedizin.ch/images/aktuell/2016/ResultsofMEstudyFeb16_im02.pdf (accessed 19 September 2018).

However, the LAV suggested that, because there was no epidemiological analysis undertaken, many pet owners were not informed about the possible link between the pet food and megaesophagus. It was argued that, as a result, the number of cases grew during 2016.¹⁶

2.14 In lieu of a state investigation, a group of independent scientists, led by Dr Ilze Matise-VanHoutan, commenced their own investigation into the megaesophagus issue. The Latvian Ministry of Agriculture agreed to fund the study for six months, but after no results were found in this time, the Minister of Agriculture made the decision to cease funding.¹⁷

2.15 Submitters from Latvia, including the head of the Latvian megaesophagus investigation, Dr Ilze Matise-VanHoutan, informed the committee that the manufacturer in question continues to deny that there is any connection between the dog food and the reported megaesophagus cases. Since first reported in April 2015, more than 256 cases of megaesophagus have been registered and radiographically confirmed by investigators in Latvia. Individual pet owners have also approached the manufacturing company directly.¹⁸

2.16 In response to the allegations, the manufacturing company has sued 17 veterinarians and their clinics, accusing them of 'spreading unsubstantiated claims' about the link between megaesophagus and its dog food, and for 'carrying out [a] slandering campaign' against it. The committee was advised that the law suit is ongoing, with the next court date set for February 2019.¹⁹ Further discussion about the Latvian outbreak is provided in Chapter 4.

Other adverse incidents relating to pet food

2.17 In addition to the megaesophagus cases associated with dry dog food, there have been a number of large-scale pet food safety incidents in Australia. These are detailed below.

Cat food toxicity (2017)

2.18 In 2017, a large number of cat deaths and instances of severe illness were associated with an American pet food known as Weruva Best Feline Friend (BFF) cat food. Prior to death, many of these cats displayed symptoms of neurological disease,

16 Latvian Association of Veterinarians, *Submission 121*, pp. 1–2. Also see: Dr Ilze Matise-VanHoutan, *Submission 95*, [p. 3].

17 Dr Ilze Matise-VanHoutan, 'I did my research, blew the whistle and found myself at war', *Tedx Talks*, 26 October 2017, <https://www.youtube.com/watch?v=uNDWvejza4c> (accessed 19 September 2018).

18 Dr Ilze Matise-VanHoutan, *Submission 95*, [p. 3].

19 Dr Ilze Matise-VanHoutan, *Submission 95*, [p. 3]. Also see: Ms Maria Kuljanic, *Submission 142*, pp. 6–9.

as well as pyrexia or fever, gastrointestinal discomfort, and odd effusions.²⁰ The health issues reported were associated with a specific line of foodstuffs produced exclusively for the Australian market.

2.19 The first case of illness associated with BFF cat food appeared in April 2017.²¹ On 5 May 2017, the manufacturer of Weruva BFF cat food announced that its Australian retailers had voluntarily removed all BFF items from shelves in Australia. The company President, Mr David Forman, published the following message on the Weruva website:

We have recently been made aware of select Best Feline Friend (BFF) canned foods, exclusive to the Australian market, which may have been produced outside of intended formulation guidelines. Out of an abundance of caution, and in partnership with our exclusive retailer of these goods, Petbarn and City Farmers have removed all BFF items from shelves in Australia until our analysis is complete.²²

2.20 The pet food was subject to 'aggressive testing of ingredients and finished product'.²³ A small percentage of cases (approximately 40 in total) were reported on the PetFAST system, which was established by the AVA and PFIAA in February 2012. However, many cases were also reported on a pet owners' website and through social media sites.²⁴ By June 2017, there were approximately 300 suspected cases.²⁵

2.21 The test results revealed that batches of Weruva BFF were deficient in thiamine, a vital component of a cat's diet.²⁶ This deficiency was said to cause the neurological symptoms displayed by the affected cats. While some veterinarians noted

20 Effusions are the presence of fluid within the sac surrounding the heart, the chest cavity (around the lungs) or in the abdominal cavity. Source: Edie Lau, 'Low thiamine suspected in cat illnesses linked to BFF food', *VIN News*, 9 June 2017, <http://news.vin.com/vinnews.aspx?articleId=45159> (accessed 30 August 2018).

21 Edie Lau, 'Low thiamine suspected in cat illnesses linked to BFF food', *VIN News*, 9 June 2017, <http://news.vin.com/vinnews.aspx?articleId=45159> (accessed 30 August 2018).

22 Weruva International Inc., Information regarding Weruva Best Feline Friends cat food, 5 May 2017 (tabled by Ms Rach Dola at a public hearing on 28 August 2018). Also see: Author unknown, 'Best Feline Friend recall: Cat food tins tested after widespread illness fears', *The Sydney Morning Herald*, 7 May 2017, <https://www.smh.com.au/business/consumer-affairs/best-feline-friend-recall-cat-food-tins-tested-after-widespread-illness-fears-20170507-gvzw23.html> (accessed 30 August 2018).

23 Weruva International Inc., Information regarding Weruva Best Feline Friends cat food, 5 May 2017 (tabled by Ms Rach Dola at a public hearing on 28 August 2018).

24 Edie Lau, 'Low thiamine suspected in cat illnesses linked to BFF food', *VIN News*, 9 June 2017, <http://news.vin.com/vinnews.aspx?articleId=45159> (accessed 30 August 2018).

25 Edie Lau, 'Low thiamine suspected in cat illnesses linked to BFF food', *VIN News*, 9 June 2017, <http://news.vin.com/vinnews.aspx?articleId=45159> (accessed 30 August 2018).

26 Tony Ibrahim, 'Testing of recalled BFF cat food reveals cause of illness', *CHOICE*, 25 May 2017, <https://www.choice.com.au/outdoor/pets/products/articles/test-results-of-recalled-bff-cat-food-250517> (accessed 6 September 2018).

that the cause could well be multifactorial, improvements were generally made when the affected pets were provided with a different diet.²⁷

2.22 Concerns with regard to thiamine deficiency have been consistently raised amongst veterinary professionals for over 20 years.²⁸ Pet meat and pet food containing sulphur dioxide, sodium, and potassium sulphite preservatives have been known to destroy the vitamin thiamine (Vitamin B1), resulting in cat and dog mortalities. Thiamine deficiency reportedly causes an acute onset of neurologic impairment which can accelerate rapidly within days and result in death.²⁹ Cats are more susceptible to thiamine deficiency than dogs, as they require about four times more thiamine in their diet.³⁰

2.23 Thiamine deficient pet food was a major point of discussion for the Pet Food Controls Working Group throughout 2009–2012. The Working Group was of the view that a 'regulatory gap' existed in relation to thiamine deficiency and that additional controls could assist in preventing further incidents. It noted that this could be done through harmonising the previously recognised pet meat standard (the Standard for the Hygienic Production of Pet Meat 2009 (PISC Technical Report 88)) with the standard for pet food.³¹

2.24 It is noted that the 2017 revision of the Australian Standard for pet food now includes a mandatory requirement that any product containing sulphur dioxide, sulphite or potassium sulphites must contain sufficient thiamine in accordance with the AAFCO guidelines, for the entire shelf-life of the product. However, concerns remain about products that do not comply with the voluntary pet food standard and which may contain sulphite or potassium sulphite – preservatives that trigger the release of sulphur dioxide thereby destroying thiamine content.³²

Kidney disease in dogs (2007–2009)

2.25 From 2007 to 2009, cases of acquired Fanconi-like syndrome were detected in small dogs in Australia and in a number of other countries. A common factor was the consumption of a particular brand of dog treats (Kramar dog treats) which were

27 Edie Lau, 'Low thiamine suspected in cat illnesses linked to BFF food', VIN News, 9 June 2017, <http://news.vin.com/vinnews.aspx?articleId=45159> (accessed 30 August 2018).

28 Dr Richard Malik, *Submission 86*, p. 1.

29 Standing Council on Primary Industries, *Managing the safety of domestically produced pet meat, and imported and domestically produced pet food*, January 2012, p. 13. Also see: R J S Steel, 'Thiamine deficiency in a cat associated with the preservation of 'pet meat with sulphur dioxide', *Australian Veterinary Journal*, vol. 75, no. 10, 1997, pp. 719–721.

30 Rural Industries Research and Development Corporation, *Building Confidence in Kangaroo Meat for Pet Nutrition*, March 2013, p. 3.

31 Standing Council on Primary Industries, *Managing the safety of domestically produced pet meat, and imported and domestically produced pet food*, January 2012, pp. 17–18.

32 RSPCA Australia, *How is the pet food industry regulated in Australia?*, http://kb.rspca.org.au/how-is-the-pet-food-industry-regulated-in-australia_609.html (accessed 20 June 2018).

manufactured in China. Some dental chews were also associated with the reported cases.³³

2.26 A study published in the Australian Veterinary Journal found that, of the 108 dogs affected in Australia, most survived but that many required aggressive supportive care. The treats were suspected of containing a toxin that targets the proximal renal tubules, and which can result in severe kidney disease or Fanconi syndrome.³⁴

2.27 In 2013, the United States Food and Drug Administration (USFDA) reported that over 3600 cases dogs and 10 cats (that had consumed jerky pet treats) had fallen ill. Of the affected animals, there were 580 deaths recorded. Despite numerous tests and visits to manufacturing facilities, the exact cause of the illness 'remains elusive'.³⁵

2.28 In its 2012 submission to the PFCWG, the AVA stated that media exposure of the problem in Australia had led to a voluntary recall of Kramar dog treats. However, the recall was not enforced, and it is believed that some retailers may have continued to sell the product at reduced prices.³⁶ Alarming, however, the RSPCA informed the committee that as the treats have never been subject to a recall, they are still widely distributed and sold throughout Australia. As a result, many cases of Fanconi syndrome linked to pet treats continue to be reported to veterinarians.³⁷

Neurological impairment in cats (2008)

2.29 In late 2008, there were a number of reports of illness in cats that had consumed imported pet food. Symptoms included neurological impairment, and in some cases, death.

2.30 The Canadian pet food company, Champion Petfoods, stated that the problem appeared to be restricted to Australia. It suggested that an irradiation treatment applied to pet food for quarantine purposes, may have been a factor in causing depletion of vitamin A, and the formation and release of free radicals in the imported Orijen brand pet food. The conclusion reached by the manufacturer was due to the fact that 'Orijen sales in Australian account for less than one quarter of one percent of total sales' and yet, Australia accounts for '100 per cent of cases'.³⁸

33 Australian Veterinary Association, *PetFAST shows pet food problems persist*, October 2012, <https://www.ava.com.au/12072> (accessed 30 August 2018).

34 M F Thompson et al., 'Acquired proximal renal tubulopathy in dogs exposed to a common dried chicken treat: retrospective study of 108 cases (2007–2009)', *Australian Veterinary Journal*, vol. 91, no. 9, 2013, pp. 368–373.

35 U.S. Food and Drug Administration, *Why Are Jerky Treats Making Pets Sick?*, 22 October 2013, <https://www.fda.gov/ForConsumers/ConsumerUpdates/ucm371413.htm> (accessed 31 August 2018).

36 Australian Veterinary Association, *Enclosure 9 to the PIMC Pet Food Controls Working Group Report*, January 2012, p. 2.

37 RSPCA Australia, *Submission 59*, p. 10.

38 Champion Petfoods, 'Orijen Cat Food | Australia', *Voluntary withdrawal notice*, 26 November 2008, https://www.ava.com.au/sites/default/files/documents/Other/Orijen_Australia_Consumer_Release.pdf (accessed 30 August 2018).

2.31 Australia has a favourable disease and pest-free status, partly due to quarantine measures, such as irradiation. Pet food products present a high quarantine risk as they have the potential to contain animal disease agents or pests that are exotic to Australia. Therefore, prior to issuing an import permit for pet food products, the Department of Agriculture and Water Resources must be satisfied that the products have undergone sufficient treatment to mitigate any potential risk.³⁹ According to Champion Petfoods, Australia is the only country that requires the irradiation treatment of its Orijen brand cat foods.⁴⁰

2.32 Following these incidents, Champion Petfoods announced a voluntary recall of all Orijen brand cat food sold in Australia. The recall, declared on 20 November 2008, was said to be a 'precautionary measure' applicable to Australia alone.

2.33 In June 2009, the Australian Quarantine and Inspection Service (AQIS), under advice from Biosecurity Australia, withdrew gamma irradiation as a quarantine treatment option for imported cat food. Any imported dog food that is subject to gamma irradiation must now be labelled with a warning that it 'must not be fed to cats'.⁴¹

Hepatotoxicosis in dogs (2011)

2.34 During 2011, a small number of dogs in Western Australia were suspected to have been poisoned after being fed a feral camel meat diet. Two dogs were subsequently euthanased. The camel meat was found to contain varying levels of indospicine, a natural plant toxin which can cause liver toxicity. The same toxin has also been found in horse meat.⁴²

2.35 Although the pet food industry is subject to restrictions regarding the origins of horse meat used in pet foods, the same restrictions do not apply to camel meat.⁴³

39 RSPCA Australia, *What is RSPCA Australia's position on the irradiation of imported pet food products?*, http://kb.rspca.org.au/what-is-rspca-australias-position-on-the-irradiation-of-imported-pet-food-products_307.html (accessed 4 July 2018).

40 Champion Petfoods, 'Orijen Cat Food | Australia', *Voluntary withdrawal notice*, 26 November 2008, https://www.ava.com.au/sites/default/files/documents/Other/Orijen_Australia_Consumer_Release.pdf (accessed 30 August 2018).

41 Standing Council on Primary Industries, *Managing the safety of domestically produced pet meat, and imported and domestically produced pet food*, January 2012, p. 5. Also see: American Veterinary Medical Association, 'Australia halts irradiation of imported cat food after link with neurologic damage', *JAVMA News*, 15 August 2009, <https://www.avma.org/News/JAVMANews/Pages/090815g.aspx> (accessed 19 September 2018). There are no reports or scientific studies linking irradiation to health problems in dogs. This is likely due to the fact that cats and dogs have different nutritional needs.

42 Standing Council on Primary Industries, *Managing the safety of domestically produced pet meat, and imported and domestically produced pet food*, January 2012, p. 13. Also see: L M Fitzgerald et al., 'Hepatotoxicosis in dogs consuming a diet of camel meat contaminated with indospicine', *Australian Veterinary Journal*, vol. 89, no. 3, 2011, pp. 95–100.

43 Emma Sleath and Gail Liston, 'Camel meat scare', *ABC News Alice Springs*, 4 March 2011, <http://www.abc.net.au/local/stories/2011/03/04/3155169.htm> (accessed 31 August 2018).

However, in response to the 2011 incidents, the AVA reportedly increased its efforts to inform pet food manufacturers and other relevant industries about the potential problems associated with natural toxins.⁴⁴

Hypercalcaemia in cats (ongoing)

2.36 In the past, there have been cases whereby cats in Australia have developed clinical hypercalcaemia due to hypervitaminosis D. The condition, which is attributed to excessive vitamin D concentrations, has been associated with the consumption of a complementary tinned cat food or 'cat grass'. In each case, the hypercalcaemia resolved relatively rapidly on withdrawal of the particular cat food.⁴⁵

2.37 A report published in the *Journal of Feline Medicine and Surgery* stated that complementary foods 'may have the potential to induce nutritional toxicity' even when a cat is fed a complete, nutritionally balanced diet.⁴⁶ For this reason, the RSPCA continues to warn cat owners to be mindful of the amount of 'cat grass' consumed by their pet.⁴⁷

Melamine contamination causing renal failure (2007)

2.38 Throughout 2007, there were a large number of incidents involving contaminants in pet food, leading to animal sickness and death. More than 8000 cat and dog mortalities in the US were linked to melamine and cyanuric acid in pet food imported from China.⁴⁸ A 2009 report estimated that over 39 000 cases of renal failure in dogs and cats in North America were due to the contaminants.⁴⁹

2.39 Melamine is commonly found in coatings and laminates, wood adhesives, fabric coatings, ceiling tiles and flame retardants. Affected animals display symptoms including uremia, anorexia, vomiting, lethargy and hyperphosphatemia.⁵⁰ The AVA reported that the same toxicity was ultimately responsible for a number of human

44 Australian Bureau of Agricultural and Resources Economics and Sciences, *Pet food safety in Australia: economic assessment of policy options*, July 2012, p. 6.

45 Standing Council on Primary Industries, *Managing the safety of domestically produced pet meat, and imported and domestically produced pet food*, January 2012, pp. 13–14.

46 Victoria J Crossley et al., 'Vitamin D toxicity of dietary origin in cats fed a natural complementary kitten food', *Journal of Feline Medicine and Surgery Open Reports*, 2017, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5731632/> (accessed 31 August 2018).

47 RSPCA Pet Insurance, *Common feeding mistakes and foods to avoid for cats*, <https://www.rspcapetinsurance.org.au/pet-care/health/common-feeding-mistakes-and-foods-to-avoid-for-cat> (accessed 31 August 2018).

48 Standing Council on Primary Industries, *Managing the safety of domestically produced pet meat, and imported and domestically produced pet food*, January 2012, p. 13.

49 Carl A Osborne et al., 'Melamine and cyanuric acid-induced crystalluria, uroliths, and nephrotoxicity in dogs and cats', *Veterinary Clinics of North America: Small Animal Practice*, vol. 39, no. 1, 2009, pp. 1–14.

50 Cathy A Brown et al., 'Outbreaks of Renal Failure Associated with Melamine and Cyanuric Acid in Dogs and Cats in 2004 and 2007', *Journal of Veterinary Diagnostic Investigation*, vol. 19, no. 5, 2007, pp. 525–531.

mortalities in Asia, particularly China.⁵¹ The melamine outbreak had significant ramifications for the regulation of pet food in a number of Asian countries.

2.40 In the US, the outbreak resulted in the recall of over 150 brands of cat and dog food.⁵² Veterinarian Dr Andrew Spanner pointed out that while it was likely that the problem of melamine contamination existed worldwide, it was only detected and recalled in the US. He further noted that it was only following the recall in the US that voluntary recalls of the same food brands took place in Australia.⁵³

2.41 Although melamine is no longer approved by AAFCO for use in pet food, the Australian Standard permits the minimum allowance of melamine in pet food as set out by the European Pet Food Industry Federation (FEDIAF). According to the PFIAA, this is a globally accepted limit.⁵⁴

Plastics contamination

2.42 In addition to chemical contamination and toxicity concerns, there have been a number of recent reports relating to plastic contamination in pet food.⁵⁵ At rendering plants, a cooking and drying process is used to turn carcasses and offal into protein meal—a dry product used to make stock and pet food. During this process, ear tags that are still attached to an animal can be melted and ground into the protein meal, resulting in contamination. Other sources of plastic contamination in food may include plastic gloves worn by butchers and other meat handlers.⁵⁶

2.43 Representatives of the rendering industry have stated that the issue of foreign contaminants is widespread. Reports suggest that Nestlé Purina Petcare received 295

51 Australian Veterinary Association, *Enclosure 9 to the PIMC Pet Food Controls Working Group Report*, January 2012, p. 3.

52 Mr Paul Terrett, *Submission 10*, p. 3.

53 Dr Andrew Spanner, *Submission 63*, [p. 3].

54 Ms Michelle Lang, Nestlé Purina Petcare Australia, *Committee Hansard*, 29 August 2018, p. 37.

55 See, for example: Ms Janine Price, *Submission 50*, [p. 1]; Ms Teresa Tassone, *Submission 89*, [p. 5]; Mrs Kate Bradbrook, *Submission 76*, [p. 2]; Mrs Christine Fry, *Submission 78*, [p. 3]; Pet Food Reviews Australia (Website), *Submission 114*, p. 1; Mr Terry Brooke, *Submission 120*, [p. 1]; Ms Jodi Burnett, *Submission 141*, [p. 9] and Angelique Donnellan, 'Animal ear tags among plastic and metal rubbish being ground up and put into pet food, insiders confirm', *ABC News*, 19 June 2018, <http://www.abc.net.au/news/2018-06-19/pet-food-insider-lifts-lid-on-plastic-and-rubbish-going-into-pe/9875184> (accessed 31 August 2018).

56 Angelique Donnellan, 'Animal ear tags among plastic and metal rubbish being ground up and put into pet food, insiders confirm', *ABC News*, 19 June 2018, <http://www.abc.net.au/news/2018-06-19/pet-food-insider-lifts-lid-on-plastic-and-rubbish-going-into-pe/9875184> (accessed 19 July 2018).

customer complaints about foreign objects found in pet food in 2015, primarily involving metal and plastics.⁵⁷

2.44 The PFIAA stated that it is now working with its member companies to implement a range of procedures to minimise the potential for contaminants in pet food products. Checking systems include magnetic detection and removal of metals, strict vendor assurance programs and audit processes, and visual inspections of raw materials and finished products. However, it acknowledged that contamination can still occur through means including the failure to remove plastic ear tags from livestock or the inclusion of foreign matter in the rumen (stomach) of sheep and cattle.⁵⁸

Impact of adverse events

2.45 During its inquiry, the committee heard of the significant emotional distress experienced by pet owners who had lost a pet or were caring for one that had been impacted by pet food related illness. A large number of cases brought to the committee's attention related to the incidence of megaesophagus linked to dry dog food.

2.46 Dr Camilla Forss told the committee that her dog's deterioration from the disease was like 'watching my child die'.⁵⁹ Others revealed the impact that the diagnosis had on their day-to-day lives, including the hours spent preparing food, monitoring their pet's movements, countless visits to the vet, and even constructing apparatuses to assist their pet's digestion.⁶⁰

2.47 Other pet owners, including Ms Shirley Benn, told the committee about the difficult decision to euthanase their pets after an extended period of suffering. Ms Benn shared her experience in losing her Maremma, Chief:

On 15 February 2018 we took our darling boy to the vet to have him euthanised. This was the hardest thing that I have ever done in my life... Chief stood by my side with his paw on my leg as if he was reassuring me that it is okay...I was holding back tears trying to be strong for him. My boy had only just turned 5 years old and here we are "giving up on him". I would never wish this on anyone.⁶¹

57 Angelique Donnellan, 'Animal ear tags among plastic and metal rubbish being ground up and put into pet food, insiders confirm', *ABC News*, 19 June 2018, <http://www.abc.net.au/news/2018-06-19/pet-food-insider-lifts-lid-on-plastic-and-rubbish-going-into-pe/9875184> (accessed 19 July 2018).

58 Pet Food Industry Association of Australia Inc., 'Pet food quality, media reports and regulation', *Media release*, 17 June 2018.

59 Dr Camilla Forss, *Submission 129*, [p. 1].

60 See, for example: Ms Rosemarie Mileham, *Submission 12*, [p. 3]; Miss Melissa Field, *Submission 13*, [pp. 2–3]; Mrs Christine Fry, *Submission 78*, [p. 2]; Mrs Debbie Guala, *Submission 93*, [p. 1] and Ms Elisia Nichol, *Submission 112*, p. 4.

61 Mrs Shirley Benn, *Submission 84*, p. 2.

2.48 Ms Rach Dola, who also made the tough decision to euthanase her afflicted dog, Zara, described the profound sense of 'emptiness and guilt' she felt after the procedure,⁶² Another submitter, Mr David Passmore, described the experience as 'heartbreaking'.⁶³

2.49 Submitters described the considerable distress and emotional toll such events have had on their lives, with many noting that they are still deeply affected by the experience. In addition, submitters noted the financial burden, resulting from countless visits to veterinarians and animal hospitals, coupled with the sacrifices that they have made in terms of the time and energy required to feed and care for a sick pet.

2.50 Dr Camilla Forss noted that her income had been 'negatively impacted' by the increased financial costs associated with the medical and dietary requirements of her ill dog. She also stated that it had become 'impossible...to work full time', given the supervised feeding regime that her dog now requires.⁶⁴

2.51 Other submitters informed the committee that they had made the deliberate decision to feed their pets a premium brand of dry food, on the understanding that the financial impost was worth the health benefits derived from the food. In some instances, a particular pet food was given on the advice or recommendation of a veterinarian. For those owners whose dogs were diagnosed with megaesophagus, their decision ultimately resulted in a far more significant financial burden.⁶⁵

2.52 During the inquiry, the committee was made aware of a compensation offer made by Mars Petcare to pet owners whose dogs had been adversely affected by its Advance Dermocare dry dog food. The company offered to repay vet bills and cover the cost of purchasing a replacement animal. However, submitters were indignant about the remedy suggested. Ms Lisa Dibbs stated:

[The compensation offer] does not come anywhere close to covering the pain, suffering, sleepless nights, time off work, endless washing of towels, purchase of numerous neck pillows, trial and error with different beds and cushions, different foods and thousands of dollars in exploratory vet bills trying to work out what was wrong with [my dog] and how we could treat him. I tried everything to make him comfortable and to eat and drink. [My dog] starved himself as it was too painful for him to eat or drink. It was heartbreaking to sit by and watch. I felt helpless.⁶⁶

62 Ms Rach Dola, *Submission 117*, p. 2.

63 Mr David Passmore, *Submission 42*, [p. 1].

64 Dr Camilla Forss, *Submission 129*, [p. 1].

65 See, for example: Mrs Chantelle Hall, *Submission 4*, [p. 2]; Ms Rosemarie Mileham, *Submission 12*, [p. 1]; Miss Melissa Field, *Submission 13*, [p. 2]; Mr James Bayly, *Submission 40*, [p. 2] and Ms Lisa Dibbs, *Submission 71*, [p. 2].

66 Ms Lisa Dibbs, *Submission 71*, [p. 2].

2.53 Rather than financial compensation, the majority of submitters focused on the need for a regulatory solution, in order to ensure that their pets' lives were not 'lost meaninglessly'.⁶⁷

2.54 In addition to the emotional and financial impacts caused by adverse pet food events, the committee was made aware of the potential human health impacts. Mrs Christine Fry shared her concerns, for example, about vulnerable pet owners who handle pet food. She explained that any toxins found in pet food would not only be bad for pets but also for pet owners who handle the food. In particular, she was concerned about owners who have autoimmune diseases, including her husband who had been diagnosed with Non-Hodgkin Lymphoma twice.⁶⁸ Ms Luise Pearson-Bernoth also expressed unease, noting that any bacteria and heavy metals found in pet food 'could easily affect...children's health as well as their pets'.⁶⁹

2.55 Submitters' fears about human health impacts were legitimised by evidence from veterinarian Dr Andrew Spanner, who referred to a study conducted in the U.S. which investigated the link between salmonella infections and dry dog and cat food. The study found that 79 salmonella infections in small children across 21 states were caused by dry dog food.⁷⁰ Dr Spanner concluded:

I absolutely believe that if salmonella gets into pet foods it will make its way to the humans involved. That has been shown in the US, and I see it in my own clinic too.⁷¹

Processed pet food

2.56 In addition to the incidents of illness associated with pet food, the committee heard from a number of submitters who opposed commercially produced pet food altogether. These submitters held the view that dogs and cats are essentially carnivores and are not suited to a commercial 'junk food' diet of processed pet food. Instead, they suggested that animals should maintain a diet of 'raw meaty bones' to ensure dental

67 See, for example: Ms Trudy Hollingsworth, *Submission 26*, [p. 1]; Ms Jodi Burnett, *Submission 141*, [pp. 11–12]; Mrs Dana Partington, *Submission 98*, [pp. 2–3] and Ms Rach Dola, *Submission 117*, p. 3.

68 Mrs Christine Fry, *Committee Hansard*, 28 August 2018, p. 10.

69 Ms Luise Pearson-Bernoth, *Submission 28*, [p. 1].

70 C B Behraves et al., 'Human *Salmonella* Infections Linked to Contaminated Dry Dog and Cat Food, 2006–2008', *Pediatrics*, vol. 126, no. 3, 2010, pp. 477–483.

71 Dr Andrew Spanner, *Committee Hansard*, 28 August 2018, p. 24.

and digestive health.⁷² Mrs Jeannine Barnard provided the following assessment of commercial pet foods:

Cats are obligate carnivores but are being fed a low protein diet and processed carbohydrates (junk food) and our pets are just not getting enough hydration and proper nutrition from their diets, resulting in ill health and diseases like kidney disease.

Although dogs are a little bit flexible and may tolerate carbohydrates in small amounts, large amounts can lead to **allergies, behavior problems, upset stomachs, weight gain, bad teeth and health**. Still this tolerance for small amounts of carbohydrates, doesn't make them omnivores either.

Sadly and ironically their diseases are treated by conventional veterinarians prescribing dry food and are mostly the cause thereof.⁷³

2.57 Proponents of the 'raw meaty bones' diet argued that they had seen vast improvements in their pets' health after making major changes to their diet. Mr Rolf Hauptmann informed that committee that his cat, once diagnosed with life-threatening diabetes, was put on a diet of raw meat and bones and is now 'disease-free, medication-free, and far healthier than previously'.⁷⁴ Another submitter, Ms Christine Lewis, stated that her dog, which had an inflammatory bowel disorder recovered when its diet changed to one of raw meat and bones. She submitted:

It is quite clear that my dog's previous ill health was entirely due to his diet of processed dog food. This is a particularly alarming insight when we take into account the fact that the expensive canned food that I was feeding him was specifically developed for dogs with digestive difficulties.⁷⁵

2.58 Dr Tom Lonsdale, a veterinarian and a prominent advocate of the 'raw meaty bones' diet summarised his view:

Conceptually it's impossible to *manufacture* food that is safe for pets. There have never, to my knowledge, been published controlled studies

72 See, for example: Mr Jason Grubisic, *Submission 66*, [p. 1]; Miss Anna Rek, *Submission 67*, [p. 1]; Mrs Tracey Jackson, *Submission 75*, p. 2; Mr Rolf Hauptmann, *Submission 72*, [pp. 1–2]; Ms Maureen Powell, *Submission 116*, [p. 3]; Mr Cameron McAllister, *Submission 111*, 1p. 1; Ms Tafline Gillespie, *Submission 109*, [p. 2]; Annie Robbie, *Submission 138*, [p. 2]; Ms Maria Kuljanic, *Submission 142*, pp. 10–13; Miss Emily Bush, *Submission 74*, [p. 1]; Mrs Jeannine Barnard, *Submission 77*, [pp. 1–3]; Ms Florence Watmore, *Submission 19*, [p. 1]; Pound Rescue Inc., *Submission 115*, [p. 1]; Ms Christine Lewis, *Submission 61*, [p. 1]; Ms CJ King, *Submission 22*, [pp. 1–2]; Miss Shonara Langley, *Submission 37*, p. 2; Mrs Melanie Christie, *Submission 62*, pp. 1–3; Mrs Carol O'Herlihy, *Submission 69*, [p. 2]; Mrs Margot Puehl, *Submission 87*, [p. 1]; Ms Anne Royle, *Submission 128*, [p. 1]; Mr Josh King, *Submission 110*, [pp. 2–3]; Ms Jessie Holt, *Submission 118*, [p. 1]; Mr Lachlan Kidd, *Submission 105*, [p. 1]; Christine Wattle, *Submission 136*, [pp. 2–3]; J Vale, *Submission 134*, [pp. 1–4] and Ms Sandra Sultana, *Submission 99*, [pp. 1–2].

73 Mrs Jeannine Barnard, *Submission 77*, p. 3. Bold in the original text.

74 Mr Rolf Hauptmann, *Submission 72*, [p. 1].

75 Ms Christine Lewis, *Submission 61*, [p. 1].

demonstrating that artificial, manufactured products are either suitable or safe for the feeding of domestic carnivores...

...*All* processed pet foods, whether directly or indirectly, injure the health of animals. From time to time identifiable additional hazards arise — for instance chemical or bacterial contamination and formulation deficiencies and excesses — that give rise to outbreaks of acute disease and death.⁷⁶

76 Tom Lonsdale, *Submission 132*, pp. 6–7. Italicised in original text.

