

Companion Animal Feeding Working Group (CAFWG):

Meeting 3 – The structure and regulation of the pet food market and the relationship between the veterinary profession and the pet food industry

Wednesday 13 September 2023 11.45am

Attendees

- Sally Everitt (Chair)
- Anna Judson (BVA Junior Vice President)
- Alex Taylor (BVNA representative)
- Andrew Prentiss (Vet Sustain)
- Dan Makin (Veterinary Surgeon and Practice Owner, Vets4Pets)
- Mike Jessop (VPHA)
- Megan Cooper (EWAP representative)
- Georgia Woods-Lee (Weight Management Clinic Nurse at the University of Liverpool)
- Taranjit Dhansay (FSA)
- Amelia Findon (BVA Head of
- Alison Ramsay (BVA Head of Policy and Public Affairs)
- Vera Cottrell (BVA Policy & Public Affairs Manager)

1. Minutes from previous meeting and matters arising

1. The group approved the minutes as an accurate record of the previous meeting subject to the following changes:
 - The use of terminology for specifically formulated diets to meet particular nutritional purposes was discussed and the group agreed on the use of the term PARNUTS (Foods For Particular Nutritional Purposes) across all documentation.
 - The term 'financial' should be replaced with 'environmental' in the heading of the sustainability section
2. The group was updated that a meeting with Pets at Home had taken place to discuss the potential for collaboration.
3. Calum McIntyre is no longer able to be part of the group due to work commitments. Alex Taylor will be drop off BVNA Officer team shortly and a replacement will be nominated.

2. Review of draft Themes document and discussion

4. Concerns about the inaccurate use of the term 'prescription' diet on food packaging was raised. It was discussed that it should be highlighted that 'prescribing' was the remit of veterinary surgeons and the group agreed to include reference to it in the themes document to highlight its importance for use by the veterinary profession.

5. The regulatory regime for nutraceuticals was raised and it was agreed that this would be covered as part of the presentation by FSA at the next meeting. In particular, the group was interested in confirming whether there were terms that can/cannot be used and whether there are regulatory requirements for nutraceuticals to undergo checks/testing.
6. It was confirmed that a 'positive' list exists which sets out terms that can be used in animal food labelling.
7. The group discussed whether there was a need for some form of oversight for microbiome enhancers as an additive to food.

3. Presentation from UK Pet Food: Overview of the UK Pet Food Market

1. **Overview:** Membership of the organisation is made up of producers and suppliers, retailers, packing companies and public affairs companies can join as associated members. Significant growth in small brands has occurred over the last few years. Organisation's role is to promote sector and the quality of the products it produces. Training and upskilling as well direct individual advice form of the membership benefits. Members have to sign up to code of practice which covers marketing. More than than 90% of manufacturers in terms of volume are members. Only minority of raw food manufacturers are members, but cover 80% of market.
2. **Advice & Training:** Produces materials to inform veterinary surgeons and nurses, including body condition charts for range of species. An annual questionnaire is conducted with vet professions covering obesity rates and other relevant issues seen in practice. Nutrition training is provided to members and veterinary professionals. Advice is not aimed directly at pet owners but materials are accessible on website, including factsheets on vegetarian/vegan diets.
3. **Sustainability:** A key driver in product innovation. UKPF helps members to understand their environmental, focus is on ingredients and production but packaging and recycling also considered. The group questioned the origin of the meat used in the manufacture of dog and cat food products. It was explained that pet food in general was produced from by-products of the human food chain that would otherwise have to be disposed of.
4. **Raw materials in pet food:** 1.3m tonnes of food being used in pet food every year, for cat and dog food split is 50% meat, 50% cereals. Vast majority of meat is not muscle meat unless it is bruised. Meat used in in raw feeding often consists of frozen chicken meat coming to end of shelf life. Most raw materials are sourced locally or from EU.
5. It was explained that welfare labelling of pet food products was impacted by current use of category 3 waste bins in abattoirs which do not segregate by-products from different categories of animals.
6. **Safety:** Set of guidelines specific to raw sector have been developed. Member companies have to pass through stringent certification requirements to obtain certification provided by an external body.
7. **Enforcement:** PFUK has no official role. APHA routinely check product manufacturing process, Trading standards officers carry out random testing of the product. ASA covers advertising.
8. **Product development:** Key concern with any new product development is that it is complete and nutritionally balanced. Traditional products have been tested on vast numbers of thousands of animals.

- 9. Adverse food reaction reporting systems:** PetFast system in Australia, a collaboration between Australian pet food manufacturers and the Australian Veterinary Association (ASA), was set up to track health problems in dogs and cats that are suspected of being associated with pet food, treats and pet meat. Reported cases are monitored and reported back to affected pet food companies. In the US, Food and Drug Administration (FDA) carries out this role.
- 10. UK model:** UKPF carrying out mapping exercise looking at organisations that could be involved in administering reporting system or hold data sources, incl. pet food companies, SAVSNET, Vet Compass, veterinary poisons information service with potential role for BVA, BSAVA and other veterinary organisations. Looking for collaboration on this issue.
- 11. Advertising and premiumisation:** It was raised that some premium pet food appeared to be using meat from the human food chain. It was explained that premiumisation is based on advanced science to create a better product and not the use of meat from human food chain. PFUK produces communication guidelines and will contact members if this is not followed.
- 12. Labelling:** It was clarified that the regulator is responsible for approving terminology used in pet food ingredients lists and that regulatory requirements around labelling were originally developed for animal feed. Certain ingredients can be summarised under a category group. Products either use steady state labelling which will detail of content or category labelling which is used for products that use blended content depending on availability of ingredients which will vary throughout the year. Some restrictions on use of 'lay' terminology stem from regulatory requirements.
- 13. Cultured meat:** no product has been brought to market but one company is progressing its product development and is in communication with PFUK.
- 14. Regulation:**
 - It was clarified that the regulator is responsible for approving terminology used in pet food ingredients lists and that certain ingredients can be summarised under a category group.
 - It was clarified that TSO carry out initial visit to manufacturers prior to the start of production and then scheduled visits. Frequency depends on perceived risk. Additionally approval is needed from APHA for handling animal byproducts.

4. Conclusions

- It was discussed whether an environmental impact traffic light labelling system for pet food was feasible and supported by owners.
- It was agreed that insect welfare should be considered and FERA were flagged as a valuable source of resources.
- The issue of human food being fed to pets was flagged as a sustainability issue.

Action: VC to facilitate further engagement to discuss data from PFUK work on ingredients

5. Presentation from Andrew Knight: Vegan diets for dogs and cats

- 15.** Plant-based diet choices for pets are driven by owners' consideration of health, environment, animal ethics, food justice. Significant increase vegan dog food market in

recent years, current value is USD\$14bn globally. Research showed that a significant percentage of vegan pet owners currently do not feed a vegan pet diet but would like to do so.

16. Dogs and cats have evolved as carnivores but modern pet diets are far removed from the feeding regime for ancestral dogs and cats.
17. Top concerns of pet owners when considering diet choice according to a Canadian survey are: pet health, nutritional soundness, good quality, palatability and environmental sustainability. In a separate survey, further evidence of nutritional sufficiency was cited as the main requirement to be met before doing so, followed in equal measure by veterinary approval and greater availability.
18. Emerging pet food alternatives are raw meat, insects, in vitro meat, plants inc. seaweed, yeast and fungi. Results of a 2020 consumer survey showed that lab-grown meat was considered the most considered alternative for pet owners currently feeding a conventional diet.
19. Results of a series of recent studies which are focused on health outcomes but are also considering sustainability, were presented with some of the findings being:
 - Potential link between feeding vegan diets and improvement in skin and gastrointestinal conditions. Canadian cat owner survey (self-reported): fewer gastrointestinal and hepatic disorders, more ideal body condition score, more cats were perceived by owners to be in very good health. It was acknowledged that due to data collection method it was subject to bias.
 - A study of more than 2000 dogs looking at 22 specific disorders found that a lower percentage (36%) of dogs on a vegan diet were classed as unwell compared to 49% on conventional meat diet. Similar findings were reported in recent study looking at cats on vegan diets.
 - A recent analysis of 16 studies on the impact of vegan diets on cats and dog health concluded that 'there was no overwhelming evidence of adverse effects arising from the use of these diets and there was some evidence of benefits'. It should be noted that much of the data was acquired through surveys of pet owners.
 - A study looking at palatability of vegan dog and cat food concluded that there was no evidence to support views of reduced palatability of such food.
20. Environmental impact: Research indicated that pet food accounts for 5% of Green House Gas (GHG) emissions globally, the underlying assumptions are based on data relating to U.S. pet food ingredients (References provided in study which has been shared with the group). Challenged assumption that by-products of human food chain would otherwise go to landfill. Analysis indicated the need to rear additional production animals provide sufficient by-products. It was raised that the data only considered the emissions produced by specific types of animal rearing and only in certain parts of the World.
21. Concerns around methodology and limitations of owner reported observations were raised. The definition of 'vegan' diet was questioned for cat studies as pets in the study also have access to non-vegan food sources including snacks and at least some were free to roam accessing alternative food sources.
22. Significant levels of parasites were found in pets on vegan diets. It was raised that there was a risk of owners misunderstanding that feeding vegan diets mitigated the risks of internal parasites.

6. Conclusions and Next Steps

- It was discussed that the development of age and condition specific diets for cats and dogs has been driven by a greater understanding of their nutritional requirements.
- The lack of synthetic arachidonic acid to create a complete vegan/vegetarian diets for cats was raised. It was noted that based on research literature in the human nutrition space, there seems to be a workaround available. Group should be commenting on the essential components to make a diet complete.
- Concerns around methodology used in studies and limitations of owner reported observations were raised. The definition of ‘vegan’ diet was questioned as pets in study also as access to non-vegan food sources.
- Consideration should be given to assessment of behavioural impact of vegan diets leading to increased predatory behaviour in cats.
- The possibility of research findings being skewed by vegan/vegetarian pet owners being more inclined to ensure preventative healthcare for their pets should be considered.
- Concern was raised as to the basis of the GHG calculations presented.
- Considerations should be given to the composition of both vegan and meat based diets in studies with regard to a sustainability assessment. Ingredients in vegan food are not automatically environmentally sustainable.
- The lack of good quality data on environmental impact was noted.
- It was confirmed that category 3 by-products are fit for human consumption but are generated based on commercial decisions taken by the meat industry to not to use them in the human food chain.
- Pet owners amongst members should try and speak to manufacturer of food being fed to their own pet to establish what information they provide.
- The sourcing of taurine for vegan pet food should be addressed with pet food manufacturers.
- The lack of long-term studies for cats on vegan diets was raised.

Actions

- SE to confirm research link to arachidonic acid workaround.
- SE to draw up list of questions to ask pet food manufacturers
- VC to follow up with UKPF how they assess that manufacturer’s vegan products are complete.

7. Future Meetings

23. It was agreed that FSA would be invited to present at the next meeting and to speak on opportunities for decreasing meat content in traditional diets.
24. It was agreed that a speaker would be invited to talk about research findings on raw feeding.