

Companion Animal Feeding Working Group (CAFWG)

Meeting 4 – Safety and Public Health

Wednesday 29 November 2023, 1- 4.30pm, via Teams

Attendees

- Sally Everitt (Chair)
- Liz Mullineaux (BVA Junior Vice President)
- Andrew Prentiss (Vet Sustain)
- Dan Makin (Veterinary Surgeon and Practice Owner, Vets4Pets)
- Georgia Woods-Lee (Weight Management Clinic Nurse at the University of Liverpool)
- Marge Chandler (BSAVA representative)
- Megan Cooper (EWAP representative)
- Mike Jessop (VPHA)
- Taranjit Dhansay (FSA)
- Vera Cottrell (BVA Policy & Public Affairs Manager)

Apologies

- Charlotte Pace (BVNA representative)

1. Minutes from previous meeting and update on workplan, timings and expected outputs

1. The members of the group approved the minutes as an accurate record of the previous meeting subject to the following changes:
 - Liz Mullineaux to be added to list of attendees.
 - Section 2 Para 6 'positive list': to be amended to clarify that there are certain terms that are defined but that there is no 'positive list' of permitted terms unlike in human food legislation. Include a reference of FEDIAF food labelling.
 - Section 3 para 3: provide more detail in last sentence to avoid use of 'in general'.
 - The term 'misleading' should not be used by the group. There are terms that are defined and used for product labelling in a different way to their use in everyday language which may result in misunderstanding.
 - To add that discussion about division between minutes and themes document took place.
2. It was suggested that minutes relating to presentations should be clearly separated into:
 - Presentation
 - Follow-up questions
 - Discussion

[Themes Document](#)

3. It was agreed that some detail recorded in the minutes should be moved to the themes document. The group discussed that the current version of the themes document should be considered a work in progress and changes will be made following the meeting.

Changes to BVA Policy Document process

4. The chair updated the group that the output from BVA working groups going forward would involve the creation of a more succinct policy position and alongside a more detailed report with recommendations. The chair expressed the view that the new approach would work well for the group.
5. The primary audience for the finished report were confirmed as vets and vet led teams. Information should also be accessible to pet owners with further sign-posting to existing information.

Actions Points from previous meeting

6. SE had looked into potential workarounds for arachidonic acid in vegan cat food. Research regarding the suitability of marine algae as a solution is ongoing but clinical data is still lacking. It was agreed that further research was needed.
7. It was agreed that the drafting of questions to be sent to pet food manufacturers should be delayed until the work of the group had progressed further.
8. Updates were provided on stakeholder engagement that had taken place since the last working group meeting:
 - **Meatly:** JS and VC spoke to representatives from Meatly, a company developing pet food based on cultured meat. JS also visited the production facility. A briefing document provided by Meatly will be shared on Glasscubes. Cultured meat production was discussed, covering expected timelines and collaboration of companies with FSA. It was clarified that no regulated product application is required to bring feed materials such as cell cultured pet food to market. Changes to the current legislative regime were raised as a possibility. It was confirmed that there is no novel feed regulation, contrary to the human food market, as feed just has to be safe. The group was made aware there is [now an entry for cultivated protein](#) materials in the [EU Feed Materials Register](#).
 - **UK Pet Food:** UK Pet Food's Veterinary and Nutrition Committee had expressed an interest in helping and supporting the work of the group.
 - **Better Origin:** A company producing insect protein for use in pet food has approached the working group and extended an invitation to members to visit its facilities.

Action Point: Secretariat to confirm when Meatly will bring product to market.
9. Further clarification of the timing of the group's work was provided with a draft final report expected to be ready to go to EWAP in May 2024, with the aim of achieving sign off at Council in July 2024. It was agreed that the group's next meeting would focus on sustainability.

2. Review of draft Themes document and discussion

10. The structure of the themes document was discussed to provide greater clarity. Welfare of the animals consumed should form part of the work. It was clarified that welfare of animals consumed would form part of the group's work and would be covered by signposting to existing BVA work on this issue.

11. It was suggested that minutes should be kept brief and that all other relevant information should be captured in the themes document. That document should also serve to capture differences of opinion and was not expected to take the form of a draft position statement.
12. Further discussion took place around the division of content between minutes and themes document. It was clarified that the themes document will be treated as a work in progress that is not intended for publication in its draft stage.
13. It was agreed that issue of the lack of ability to separate of higher welfare category 3 offcuts in abattoirs preventing the production of pet food labelled accordingly should be addressed in the themes document.
14. It was agreed that time should be set aside at a future meeting to discuss the themes document.

3. Presentation from FSA: Regulation and Public Health:

15. The group received a presentation from the FSA giving an overview of the regulatory regime for animal feed products and relevant product safety legislation. The following points were covered:
 - FSA's remit is to protect public health by ensuring the effectiveness of the food regulatory system. Responsible for feed safety legislation including pet food and treats. Feed must be safe, with no adverse effect on animal health or human health including food from food producing animals, and no direct adverse effect on environment and animal welfare.
 - An overview of the relationship between FSA in the devolved administrations and other agencies, especially Defra.
 - FSA policy priorities in relation to animal feed include alternative proteins, and food safety and hygiene including raw petfood and salmonella.
 - Controls to ensure verification of compliance with feed and food law, animal health and animal welfare rules were explained. An overview of the relevant regulatory framework and the FSA's work on Retained EU legislation was provided.
 - The registration process for animal feed businesses was explained. Registration via competent authority (local Trading Standards Office/Environmental Health Authority) is required if business makes, market or use animal feed. Further details are available on the [FSA website](#).
 - Labelling standards: Labelling must include certain details, including the type of feed and the animals it is intended for and instructions of use, as well as details of the ingredients and analytical declarations.
 - Claims need to be objective and verifiable by competent authority. Must be able to by scientific evidence or their own research. If not substantiated those would be considered as misleading claims.
 - Claims that a product prevents or cures diseases are not permitted. This would fall under Veterinary Medicines Regulations.
 - Pet food can be made in domestic setting but same regulatory compliance process as for other producers must be adhered to.
 - **Raw pet food:** made up of uncooked meat or unprocessed meat with other uncooked ingredients. Constitutes most common animal feed incidence notification. Risk caused by

potential presence of pathogens and bacteria which would normally be killed during cooking process. Risk mitigation advised via hygiene measures, safe storage and handling.

- **ParNuts:** Feedstuff for particular nutritional purposes to meet the particular nutritional needs of animals, covered by regulation 2020/354, can satisfy those needs by composition or method of production. May only be marketed as such if its intended use is included in list of intended nutritional uses and it meets essential nutritional characteristics for respective particular nutritional purpose.
- **Nutraceuticals:** The term is not defined in the legislation but is an industry term used for marketing purposes. Are a feed material intended to perform a certain function eg technological or sensory function. Are not regulated products and can be freely marketed but entity placing them on market has to be make sure they are safe, sound and genuine without adverse effect on animal welfare and environment in compliance with Regulation 178.

16. In discussion following the presentation, the following points were raised:

- It was explained that vets or pet owners could ask for additional information from feed companies, but the company is under no obligation to provide it. Concerns about truthfulness of claim can be brought to the attention of competent authority.
- It was explained that there are no set evidence requirements for claims eg what evidence would be needed to substantiate claim that product impacts microbiome. In cases where TSA has concerns, they can be raised with FSA and looked at by their science division.
- It was confirmed that England, Wales and Scotland follow REUL while NI follow current EU law, but that divergence is still minimal.
- It was explained that APHA requires testing for salmonella in raw pet food, but clarification is outstanding for whether this also applies to processed pet food. This constitutes a large number of incidents that FSA handles from its reporting system. It was raised that this evidence basis was anecdotal rather than published evidence.
- It was clarified that anything that is orally fed to pets would be covered by feed regulations and FSA rules.
- It was clarified that food not classified as animal feed is not covered by regulations.
- Small producers and others such as butchers or restaurants selling food for pets, are also not covered by regulatory regime (check minimum threshold).
- Retail of pet food is not covered by FSA regulation including human food outlets offering pet food menus (eg cafes, pubs). FSA looking at guidance to TS officers who should and should not be registered.
- Status of chews not intended for feeding was raised. It was confirmed they have been included in feed regulations as they have caused illness in past.
- Reporting was raised: notification system in place used by FSA and trading standards to log incidents. Horizon scanning is conducted including across other countries. It was raised whether there is gap to be filled by involvement of wider group of experts similar to PetFAST system in Australia. It was flagged that there is no information distribution system to vets in place when concerns about contaminated products are raised.
- Incorrect storage of food by retailers was raised and it was suggested that the requirements for pet boarding establishments provided a precedent for Local Authorities to follow.

- It was clarified that Government carries out equivalence exercises when signing trade deals.
Action Point: TD to confirm salmonella testing requirements and [share link](#) for FSA survey on cat food

4. Presentation from Genever Morgan, University of Liverpool: antimicrobial resistance and the public health impact of feeding raw meat diets to dogs

17. Dr Morgan presented an overview of her PhD research:

- Background
 - The PDSA Paw report 2022 reports 7% dogs fed raw food (5% commercially -prepared, 2% home-made) Equating to that around 790000 of UK dogs being fed raw diets
 - Comprised of uncooked/untreated animal tissue (Muscle, bone, cartilage, skin, fat, internal organs/offal). 'Human grade' meat (DEFRA category 3 animal byproducts)
- Concerns stem from:
 - Shown to harbour pathogenic and zoonotic bacteria: *E. coli*, *Salmonella* spp., *Listeria* spp., *Campylobacter* spp., and *Clostridium perfringens*
 - Growing number of studies demonstrate presence of AMR bacteria in RMD for dogs.
- First phase: data collection via 'Dogs' Dinner Survey'
 - [A Dog's Dinner: Factors affecting food choice and feeding practices for UK dog owners feeding raw meat-based or conventional cooked diets - ScienceDirect](#)
 - This was an online survey of owner pet food preferences based on more than 3000 dogs, approx. 50% were fed raw.
 - Aim of study was to investigate the preferred food types chosen by dog owners and their perceptions of the risks.
 - Reasons for diet choice:
 - Owners feeding raw diet more likely to cite coat quality, behavioural reasons, a lack of trust of certain foods and a more natural choice as reasons for their diet choice
 - Owners who fed a non-raw diet were more likely to cite advice from a vet professional, cost and safety concerns as reasons for their diet choice.
- Second phase: Food study
 - Microbiological analysis Based on most popular brands
 - 10 brands frozen pre-prepared raw meat and 10 conventional kibble diets for dogs:
 - Published results in [An investigation of the presence and antimicrobial susceptibility of Enterobacteriaceae in raw and cooked kibble diets for dogs in the United Kingdom](#)
 - The microbiological result showed that:
 - 99% of raw meat samples grew *E. coli*
 - 39% of raw meat samples had antimicrobial-resistant *E. coli* present
 - 14% of raw meat samples had Extended-spectrum beta-lactamases (ESBL)-producing *E. coli* present
 - No kibble samples grew any *E. coli*
 - Key findings:

- RMDs in the study were frequently contaminated with and may be a significant source of AMR and MDR E. coli.
- Packaging in the study was frequently found to be compromised and leaking.
- Third phase: Study looking at faecal samples from raw vs non raw fed dogs
 - 432 samples 193 (44.7%) raw fed , 239 (55.3%) non raw fed
 - Significantly higher percentage of ESBL-producing and MDR- E. coli was isolated from RMD-fed dog.
 - Quarter of RMD-fed dogs carried faecal ESBL-producing E. coli, often MDR, resulting in risk for human/animal health from zoonotic AMR bacteria.
 - Dogs fed RMD shed ESBL-producing E. coli both consistently and intermittently over time.

18. In discussion following the presentation, the following points were raised:

- It was confirmed that there was no E.coli growth on any of the tested kibble.
- Further studies on AMR bacteria in pet food are in progress. FSA also looking at putting relevant advice on their website. It was mentioned that UK Pet Food has put in place accreditation system for raw pet food manufacturers.
- The regulatory regime for pet food companies was raised and whether raw ingredients should be tested at beginning of the process.

5. Discussion

19. It was discussed whether an environmental impact traffic light labelling system for pet food was feasible and would be supported by owners.

20. It was agreed that insect welfare should be considered and FERA were flagged as a valuable source of resources.

21. The issue of human food being fed to pets was flagged as a sustainability issue.

22. The importance of owner communication was raised as output for the group and this will be discussed in detail in meeting 6

6. Future Meetings

23. It was agreed that the group would meet two more times:

- Meeting 5 on Sustainability. Suggested speakers included a representative from FERA, Sustainable(ish), and a speaker with a background in pet food.

Action Point: AP to reach out to academics working on sustainability

- Meeting 6 to discuss communication with consumers and the themes document. This meeting should be held in person.

24. If required a further meeting to be held to finalise report