

4th July 2018

Senate Standing Committees on Rural and Regional Affairs and Transport
PO Box 6100
Parliament House
Canberra ACT 2600

Attention: Committee Secretary

Dear Sir/Madam,

Re: Regulatory approaches to ensure the safety of pet food

Summary

As an owner of a beloved dog who developed Megaesophagus as a result of feeding Advance Dermocare, I would like to see and believe it should be a requirement for pet food manufacturers to meet improved (non-self) mandatory regulatory standards to ensure the health and safety of pets and pet foods in Australia.

I am recommending pet food products be added 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 mandatory recall framework by Food Standards Australia New Zealand (FSANZ) for human food products. This would enable one statutory authority to oversee food standards across both human and pet foods for Australia and New Zealand.

Background

As a single woman in my thirties who has worked and lived in remote and is now in regional NSW as a High School Teacher, my dogs are my life. I am a responsible and loving dog owner with two German Shorthaired Pointers (GSPs) (one who is 4 years old, and the other 8 months) both are spade and registered. My spare time is usually spent training my dogs and participating in dog sports competitions.

My 4 year old dog is one of the dogs affected by the recent recall of Advance Dermocare dog food. She became symptomatic in mid-December 2017 with recurrent regurgitation, which progressively became worse over the next 10 weeks. She struggled to keep food and water down, often regurgitating up to 15 times a day, sometimes up to 5 times within 2 minutes. She rapidly lost weight (spiralling from an athletic muscular dog to a tired, skin and bone shell), became a resource guarder of her food and developed a severe case of Aspiration Pneumonia.

She was exclusively fed Advance Dermocare from December 2015 on recommendation from her Veterinarian in an effort to reduce ear infections from a wheat/grain allergy. After developing symptoms in December 2017, she underwent x-rays which revealed inflammation of the oesophagus. We commenced treatment for oesophagitis, giving her four varieties of medications,

three times a day. My dog, Pepper, showed symptom improvement with medical management but never completely recovered, only reducing the regurgitation to several times a day. In early February, I sought a second opinion where she again went under x-ray, this time with barium to help highlight the digestive system. This showed a severe dilation of her oesophagus. I was provided with another four varieties of medications, taken twice a day and to change her dry biscuits from Advance Dermocare to a high quality Ivory Coat puppy biscuit in an attempt to increase her weight. Blood tests were also taken at this time to rule out any possible underlying diseases such as Myasthenia Gravis. These blood tests all came back clear. It took over a month to rid Pepper of the aspiration pneumonia and in that time I could not walk her, allow her to play with my new puppy, train for/participate in dog sport competitions, or take her by car for more than 15 minutes (my closest family is a five hour drive away). When Pepper had put on enough weight to stop the outline of her ribs from showing, I attempted to feed her the Advance Dermocare biscuits again (the link between Advance Dermocare and Megaesophagus had yet to be identified at this time). That night she regurgated everything within 20 minutes of eating and continued to regurge fluid every half an hour for the remainder of the night.

Since commencing feeding Ivory Coat puppy biscuits, Pepper has put on approximately 8 kilos and is now only 4 kilos under her original weight prior to symptoms occurring. She no longer looks like an abused underfed dog. She will occasionally regurge her food (it is down to once or twice a month) if she doesn't stay with her front end in an elevated position long enough. I am forever required to feed her on a high platform or in a Bailey Chair in order to use gravity to draw food from her mouth into her stomach. At the moment she is back to being her playful, energetic self and we are slowly working on rebuilding her muscular definition and fitness conditioning in an attempt to return to the Dog Sports Competition Circuit, now made much more difficult due to being unable to train using food treats.

After the diagnosis and identified link, I contacted the Advance Dermocare customer service line by phone and email. I received no reply by email and the phone rang out on two different occasions over several days. By the third phone call attempt, the company had responded to the increase in Megaesophagus and its possible food link and I was able to relay my information and Pepper's diagnosis to a customer service representative. A week later Advance recalled the Dermocare range. I was notified by a news report on the ABC that Advance Dermocare bags could be returned to the shop purchased for a refund. I was notified of this possibility for refund by email two days after I had returned my 15kg bag to Petbarn. In March 2018, I received an offer of consideration for reimbursement for Pepper's associated vet bills with a range of confidential terms. I am not sure the offer takes into account the range of future issues and complications that will inevitably result from the Megaesophagus, including the fact that I will eventually be forced to have my beloved dog euthanised when she no longer has quality of life due to complications with the condition. This could occur anytime within the next week through to several years from now.

Some of the issues caused and life changes I have had to make to accommodate this incurable condition is:

- Ensuring Pepper does not play with a toy or my other dog for a minimum of four hours after every meal in an attempt to make sure her food makes it to her stomach and can be digested

- I can no longer go away on a holiday or two day work trip out of town for fear of having a boarding kennel or friend not follow the strict way of feeding and caring for her, which could result in another case of aspiration pneumonia or death
- I can no longer take my dogs camping as there is no way for me to feed Pepper in the appropriate feeding position to get food down into her stomach
- Feeding her too late at night can cause regurgitation as there is not enough time to allow movement and digestion of food before going to bed
- Pepper is required to sleep with a large neck pillow (attached fully around her neck) to prevent saliva going into her lungs when asleep. This includes daytime naps.
- I cannot feed her or allow her to drink water during long road trips to see family or attend dog sport competitions as the limited time and movement of the car will cause regurgitation
- I cannot allow her to drink water during a walk as the head down/sniffing action will cause regurgitation
- She can no longer eat grass to relieve an upset stomach as it can get stuck in her throat and has no way to make it down into her stomach unless fed immediately after eating it
- Her health and fitness condition rapidly decrease every time she gets aspiration pneumonia. It becomes a continuous struggle to treat the subsequent weight loss and pneumonia and severely impacts on her ability to play with my other dog
- She can no longer eat bones or chew hard treats to clean her teeth because these items are always eaten in a prone position
- The mental anguish and stress at the possibility of coming home from work to find her dead in the backyard due to complications from aspirated food/water into her lungs
- Waking at every sound she makes during the night for fear she is about to regurgitate
- I need to be constantly aware of how Pepper is relaxing – when she wants to lay in a prone position I need to put her neck pillow on her

This is what I have had to discover, accommodate and stress about in the six months since diagnosis. There are many more issues I will come across as Pepper ages and as we slowly work out what does and does not work in relation to our everyday living. Based on the Megaesophagus conditions of other dogs in the social media support group I am a member of, Pepper is one of the lucky ones as she does not have the condition as bad as some of the others, yet.

Through reading other submissions and those affected speaking out on radio, TV and social media, it appears that Mars was notified in mid-2017 of dogs reacting to their Advance Dermocare range. Had Mars taken these issues and complaints seriously and recalled their product sooner, Pepper would not be living with an incurable condition that has and will forever impact our lives. This should never have happened and I would like to see and believe an authority such as FSANZ should regulate the pet food industry in Australia, so that a situation like what has occurred, never happens again.

Mandatory pet food standards with regulation of labelling, nutrition claims and recall frameworks for all pet food products are needed to protect our pets. Pet food should consist of human grade meat, with no allergy causing filler ingredients, no harmful chemicals such as those used for euthanising and no plastics such as that from livestock ear tags or product packaging should be

allowed. Pets do have different nutritional requirements to humans but there is no reason why the food to satisfy these nutritional requirements not be human grade quality.

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. Using the same standards that we are required to follow and incorporating labels such as the percentage of Australian ingredients in the product (<https://www.business.gov.au/info/run/goods-and-services/selling-goods-and-services/selling-goods/country-of-origin-food-labelling/what-the-new-labels-look-like>) would greatly assist consumers in identifying healthy options. Many products are also labelling their meat component as 'by-products'. These meat by-products can include euthanised and diseased animals, fat, tumours/cancer masses and animal waste materials (<https://www.dogfoodadvisor.com/choosing-dog-food/animal-by-products/>). Changing the way pet food manufacturing companies identify their ingredients would reduce inedible and unsafe materials from being incorporated and passed off as meat. The labelling of 'grain free' pet foods in Australia is also misleading. Many companies are labelling a range of their food as good for dogs with sensitivities, yet include wheat and corn variations as fillers. If clear labelling and ingredient 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

I was not aware of the PetFAST tracking system to report my dog's reaction to, until after Advance Dermocare was voluntarily recalled in March 2018. It was brought up on a social media group that was created to support people in a similar situation. Once I became aware of PetFAST, I looked into how to lodge a report and realised it was only accessible to Veterinarians. I then asked the Veterinarian who diagnosed my dog, to lodge a report.

In the case of the voluntary recall of Advance Dermocare in March 2018 I would recommend a mandatory recall framework with legislative power to order a food product recall where 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 Megaesophagus for the rest of their lives. I recommend an extension of Food Standards Australia New Zealand authority to coordinate the recall action.

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

I 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 all 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

I recommend pet food products adopt the mandatory recall framework (Standard 3.2.2) by Food Standards Australia New Zealand for human products so that situations similar to that with Advance Dermocare are prevented. Had legislative power been in place, it may have led to Advance Dermocare being recalled sooner and less dogs being affected by Megaesophagus.

Comparisons with international approaches to the regulation of pet food

I do not really know much of how other countries approach the regulation of pet food but I believe in Australia the regulation by Food Standards Australia New Zealand authority would help to ensure there are adequate recall frameworks in place. This would prevent what has occurred with the Advance Dermocare situation 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.

Conclusion

Pet owners have always trusted pet food manufacturing companies to produce food that is safe and healthy for our pets. The situation that has occurred with Advance Dermocare has shown the Australian (and possibly international through social media) public that this industry cannot be trusted to regulate themselves adequately. Therefore it becomes our moral obligation to ensure appropriate practices are put into place by a suitable overarching food authority. Please do not allow any more pets and families to suffer the mental, physical and emotional stress from preventable food related issues and conditions.