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Agricultural Appropriations Subcommittee Hearing
Pet Food Safety

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Good afternoon, I would like to thank the Chairman Kohl and the committee members for inviting me to this hearing.

Today I would like to address 3 key areas in my testimony. My concerns cover 1) the safety and testing of the US food ingredients, 2) pet food manufacturing oversight, 3) and tracking of adverse health events in companion animals.

1) Safety and Testing of Ingredients

It is apparent that the US food supply for pets and people is at risk for accidental toxin contamination and agriterrorism. The Menu Foods contamination was caused by undetected toxins in an ingredient widely used in pet food manufacturing. Contributing to the scope of the problem was poor tracking of the contaminated ingredients within the market place.

Can we prevent future ingredient contaminations?

I doubt that we can prevent all contaminations. There are hundreds-of-thousands of toxins. Many toxins are yet unknown and others are difficult to detect, even with sophisticated testing protocols. Our ability to completely test all samples of imported or transported ingredients is would seem infeasible. While regulatory oversight helps to protect foods produced within the US, global suppliers are not under the same level of regulatory scrutiny. In the Menu Foods example, I do not believe melamine would have been detected by our standard screening processes. We screen for the expected δ and that does not include melamine. Increased USDA and APHIS oversight along with ongoing homeland security measures can improve food safety. However, research into more effective screening tools and access to specialized laboratories are warranted.

Can we limit the exposure to contaminated ingredients?

The Menu example highlights the lack of adequate tracking of our ingredient supply. Nearly a month after the suspected ingredient was identified; manufacturers continue to discover products with the banned ingredient. This represents an additional month of pet exposure to potentially toxic foods. Tracking of ingredients from the point of origin to final disposition will facilitate the rapid implementation of a total recall and thereby limit further exposure.

2) Pet Food Manufacturing Oversight

I believe the pet food industry is under far greater regulatory oversight than has been portrayed. While certain aspects of these regulations require self-monitoring, the regulations for product claims, nutritional adequacy, ingredients use, and animal testing are stringent, well defined, and from my experience with the FDA, closely monitored. Most visitors to pet food manufacturing facilities are impressed by the degree of ingredient evaluation, product testing, research, and quality control provided voluntarily by the companies. While this level of self-monitoring is not uniform across all companies, in my experience most manufacturers are extremely diligent in their efforts directed toward product quality and animal health.

Would more oversight prevent pet food contaminations?

In some cases, Yes. The FDA reports on Diamond and Go Natural pet food recalls suggest inspections may have improved adherence to quality control and good manufacturing practices, thereby preventing these contaminations. It is unlikely that additional oversight would have fully prevented the Menu Foods contamination.

Could more vigilant regulatory intervention help to limit exposure?

If it were mandatory for manufacturers to immediately report significant adverse events to a centralized regulatory agency, earlier investigative action and product withdrawal could occur. However, establishing reasonable criteria for when to alert regulators could still be a challenge.

3) Tracking Adverse Events

Surveillance and centralized reporting provided by the CDC has helped to identify and contain food born disease in people. There are no such surveillance and reporting services available for companion animals. Complaints of adverse events, whether from drugs or pet foods, are directed primarily to manufacturers. Because Menu Foods produced products for several companies, multiple brands were affected. No doubt, part of the delay in recognizing the problem stemmed from scattered reports to individual companies and no clear pattern of cases to indicate a serious problem.

Additionally, the inability to capture data and identify the true scope of the problem has resulted in pet owner distrust of government agencies and pet food manufacturers alike. While some estimates of the magnitude of pet deaths are clearly exaggerated, the official reports of confirmed cases are unrealistically low. Those attempting to report cases have been frustrated by the inability to contact the FDA due to the overwhelming volume of calls.

What can we do to improve the safety of pet foods and limit exposure to tainted pet foods?

One solution is to establish a centralized site for veterinarians and consumers to report adverse events and catalog affected cases. Earlier detection, notification, and withdrawal of tainted products will help prevent ongoing exposure. Earlier consumer notification will alert veterinarians to evaluate pets for toxic exposure and preserve

needed information to document such exposure. Tracking pet health provides the additional benefit of acting as a sentinel for the human food supply.

Sadly, we will never know the true scope of the Menu problem. It is unlikely that owners of pets affected prior to the March 16th recall can prove their pet was a victim of toxicity. The pet food labels are long gone and their pets have been laid to rest.

Thank you for your attention.