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Something to Chew On
Debbie Phillips-Donaldson

Bright days ahead—with a few clouds

“ON SOLID GROUND.” That’s how Packaged Facts describes the US pet industry in its new report, US Pet Market Outlook 2010-2011: Tapping into Post-Recession Pet Parent Spending (www.packagedfacts.com). It shows the pet care market grew last year despite the awful economy, and most signs point to continued growth for the next year and beyond. However, our industry will need to monitor a few potentially dark clouds.

The report says US sales of veterinary services rose almost 8% in 2009 (to US$18.4 billion), followed by petfood at 5% (US$17.8 billion), non-medical pet services at 4% (US$5.8 billion) and non-food supplies at 3% (US$10.7 billion). In share of the overall US pet care market, veterinary services leads at 35%, with petfood close behind at 34%.

But over the next four years, Packaged Facts predicts the veterinary services share to increase to 40.7%, with petfood’s falling to 30%. Why? “As the population of senior pets continues to increase and market participants continue to adapt human-style technologies and medications and develop new pet-specific ones, the veterinary category will see its growth rate steadily increase,” the report states.

Meanwhile, retail price-cutting for petfood (in PetSmart and Petco) could slow dollar growth, Packaged Facts says, surmising that “2009 saw considerable migration of premium petfood purchasing to mass channels.” Walmart had strong pet category growth; the pet specialty and natural supermarket channels lagged.

Pet owner confidence is another factor, and the picture is mixed. Packaged Facts cites its own study of approximately 700 US pet owners in February, which showed 19% of respondents strongly disagreeing that they are spending less on pet products because of the economy. However, 21% somewhat agreed they’re spending less. The report also mentions a February study by Catalyst Direct showing 73% of pet owners (among 400 Americans surveyed) worried about finances, 64% more anxious and 59% less confident.

The March issue of Pet Business magazine reported on a survey of nearly 500 consumers in five US metropolitan areas (www.petbusiness.com/articles/2010-03-01/A-Portrait--of-Our-Shoppers) showing 71% of respondents now consider price the top priority when buying pet care products. Further, 31% said they’re spending 25-50% less on pet supplies compared to a year ago; 24% are spending 50-75% less. When shopping for petfood, 60% said they buy from mass merchandisers (including grocery stores); 21% at Petco or PetSmart and 16% at independent pet stores.

There is good news. The Pet Business survey revealed petfood is not suffering as much as other pet categories; consumers said they’re still willing to spend more to ensure their pets’ nutritional needs are met. In the Catalyst Direct study, 83% of pet owners cited their pets’ emotional support helping them survive the tough economy and 86% valued the sense of stability their pets provide.

Packaged Facts predicts the retail playing field will level out by the end of this year, with premium-oriented pet owners returning to pet specialty stores. It projects US petfood sales to grow 4.5% in 2010 and 2011.

And if you use new product introductions as a barometer of the industry’s health and momentum, as Packaged Facts does, we’re in good stead. The report touts a 14% increase in pet product launches last year (according to Datamonitor’s Product Launch Analytics), following a 38% rise in 2008. Many were for petfood products.
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Petfood Forum Asia draws professionals from throughout region

More than 100 petfood professionals from throughout Asia-Pacific, as well as several countries in Europe, attended Petfood Forum Asia 2010 on March 3 in Bangkok, Thailand, to learn from industry experts about the market, pet nutrition and key processing and safety issues.

Attendees representing 19 countries received data and insights from Jean-Jacques Vandenheede of AC Nielsen Europe on the quickly recovering and growing consumer packaged foods market, including petfood. George C. Fahey, PhD, of the University of Illinois and David Thomas, PhD, of Massey University in New Zealand both shared research on cat nutrition (fiber sources and nutraceuticals, respectively), while Anton C. Beynen, PhD, of Vobra Special Pet Foods in the Netherlands presented his case for breed-specific vs. all-breed and all-lifestage foods for dogs.

In addition, Jim Mann of Kemin Nutrisurance explored the nutrition, palatability and safety aspects of biogenic amines in petfoods. Galey Rokey of Wenger Manufacturing explained how processing and hardware impact petfood safety, and Enzhi (Michael) Cheng, PhD, and Will Henry of Extru-Tech Inc. covered critical processing issues for saving energy and money.

Petfood Forum Asia, held for the second time, occurred in conjunction with Victam Asia, which drew key global petfood and feed suppliers and professionals to its three-day trade show. Both Petfood Forum Asia and Victam Asia are scheduled to be held again in 2012.
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Wagg unveils scented advertisement for dogs
UK petfood manufacturer Wagg Foods has developed the first dog food advertisement that smells of its product’s meaty aroma. The billboard, which depicts a bowl of dog treats, is scented with a customized aroma that Wagg researchers have developed after studying dogs’ preferences. If it proves popular with dogs when it is unveiled at a number of London locations, the company plans to roll out the advertisements across the UK.

China aims to restrict imported petfood
China’s State Council recently released the revised draft of the Administrative Rules of Feed and Feed Additives to address the issue of melamine contamination in petfood in the country. However, the legislation explicitly aims to restrict the direct sale of imported petfood and feed additives by foreign enterprises and individuals. This, and other restrictions included in the draft on foreign suppliers, has more to do with protecting state-owned enterprises than enhancing petfood safety.

FDA investigating dog treat
The US Food and Drug Administration said it is looking into complaints about the Real Ham Bone for Dogs that has reportedly caused serious illness or death in dogs. The smoked pig femur sold as a dog treat is distributed by Dynamic Pet Products, according to The Associated Press.

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April 2010

Petfood Industry
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Giuntini offers a small and medium size dog food that is part of the Crancy Italian Way line, inspired by traditional Italian cuisine. Ingredients include olive oil, rosemary oil, tomato extracts and garlic powder. There are no preservatives or artificial colorings, according to the company. Conagit S.p.A. +075.8517845 www.conagit.it

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The secrets of selection

How do pet owners choose petfood? Dr. Kathryn E. Michel explains the philosophy behind people’s food choices for themselves and how that translates to what they look for in their pets’ food.

By Jessica Taylor

If you really want to know why pet parents buy the foods and treats they do, ask them. Build a relationship with your customers and be transparent.

Online extra!
Consumers have a growing awareness of the role of nutrition in maintaining health and preventing disease, not only in their personal lives but their family’s as well, which often includes pets. Combined with a growing acceptance of complementary and alternative forms of medicine, and an increased access to information, especially via the Internet, pet parents have become more concerned with pet nutrition.

Suddenly, pet owners are scrutinizing petfood labels for calories, ingredients and country of origin labels as they would a meal meant for their own dinner table. Kathryn E. Michel, DVM, of the University of Pennsylvania investigated this new philosophy behind buying food for the pets’ bowl and found the reason why consumers buy what they do.

Nutrition pushed to the forefront of pet owners’ minds soon after the 2007 petfood recalls. Pet parents started looking for information on dogs’ and cats’ nutritional needs, and Michel says they often found it from veterinarians, family and friends, the media, the Internet, groomers and trainers.

Did you notice none of the consumers mentioned looking for information from the manufacturer or the nutritionists helping to develop petfood formulas? Instead, more and more often, veterinarians have become the source of information for things like the safety and nutritional adequacy of commercial petfoods, alternative and unconventional diets and dietary supplements.

If petfood producers take the time to understand why pet owners choose certain feeding practices, that would help facilitate:
- Discussion of options and alternatives to current feeding practices; and
- Influencing pet owners to modify their feeding practices.

According to Michel, when consumers are worried about nutrition, they are most interested in the ingredients being used to make up their pets’ diets. Common ingredient concerns include types and sources of ingredients—does the package mention by-products, rendered meats, grain/grain-free or list additives? Another thing pet parents are looking for when they scan a petfood label: What ingredients are lacking?

Consumers continue to be interested in alternative diets—those that deviate from processed dry and canned wet petfoods—like raw, frozen, refrigerated, holistic, vegetarian, vegan, natural, organic and home-prepared meals.

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Knowing what is in petfood is one thing, but knowing where and from whom these ingredients are coming is another.

More often, however, pet owners want to know about quality assurance (QA) practices your company has in place to ensure the safety of their four-legged family members:

■ Do you have established vendors?
■ What specifications do you hold your vendors to?
■ Are your ingredients tested for nutrient content, microbiologic concerns and toxins?
■ Do you use feeding trials as a standard for nutritional adequacy?

In order to communicate with consumers about their nutritional, ingredients and QA questions, Michel recommends addressing concerns instead of ignoring or avoiding them. Identify the specific concerns of the pet owner, correct misconceptions they may have and emphasize the importance of QA, she suggests.

If pet parents are becoming more concerned about the foods they are eating, it’s only natural for them to start to have the same worries about the foods their pets are eating. Food is, as defined by a social constructionist viewpoint, a domain in which individuals define who they are in contrast to others.

According to Michel, pet owners will not only transfer their attitude about food to how they think their pets should be fed but also may focus on how the pet’s identity is defined by diet. When consumers begin to view their dog and cat’s diets in this way, they will often begin to investigate alternative diets—those that deviate from processed dry and canned wet petfoods—like raw, frozen, refrigerated, holistic, vegetarian, vegan, natural, organic and home-prepared meals.

These types of foods appeal to many pet parents for multiple reasons.
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such as being viewed as more ethical, better for the animal, more “natural” for the animal or safer than traditional diets. When pet owners turn to these unconventional diets in search of an answer to a pet’s health problems, weight management or personal beliefs of their own, Michel reminds producers and manufacturers to pay attention:

- What are the owner’s reasons for a new diet or feeding regimen?
- What does the owner perceive as being better or healthier about the diet?
- And remember, never be afraid to offer alternatives.

If you really want to know why pet parents buy the foods and treats they do, ask them.

Build a relationship with your customers and be transparent. Once you can establish an open dialog, you will begin to learn just what consumers are after when they are making meals for Fido and Fifi.

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The “B” word

The animal feed industry, including the petfood sector, regularly uses the by-products of the human food industry in the formulations for their foods. According to Michel, the public perception is often that by-products by definition are unwholesome and non-nutritious. Although it is true that by-products vary in their quality and suitability as ingredients, many are essential to the nutritional needs of dogs and cats, no matter how unsavory they may sound. Even feeding ingredients not specifically designated as by-products—beef, for example—are often what many pet parents would consider offal. What can you do to change public perception?

- Educate pet owners on the benefits of your ingredients.
- Be transparent about your ingredients. Many petfood companies provide a full list of ingredients either on their packaging or their website.
- Provide scientific information on the development of your petfood formula.
- Don’t be afraid to let nutritionists and veterinarians weigh in. Consumers want the facts from someone they trust!
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Petfood gets political

HSUS recently launched its own line of organic dog food—what does its entry into the marketplace mean for the industry?

The Humane Society of the United States (HSUS) just released its first ever dog food, Humane Choice. Launched in February 2010, the dog food is a vegan, soy-based formula and does not support the factory farming industry, according to HSUS.

HSUS is largely known as the nation’s largest animal protection organization—not a petfood manufacturer—and has recently come under scrutiny by watch groups like the Center for Consumer Freedom.

The Humane Society of the United States

HSUS is largely known as the nation’s largest animal protection organization—not a petfood manufacturer—and has recently come under scrutiny by watch groups like the Center for Consumer Freedom. The group, represented by blogger David Marosko, recently took out a full-page ad in the New York Times, accusing HSUS of failing to allocate a significant amount of donations to needy pet shelters.

In a recent blog post by Petfood Industry editor-in-chief Debbie Phillips-Donaldson, she voiced the thoughts of many industry insiders: “I have to confess surprise that an organization like HSUS would even enter this marketplace. Think about it: HSUS has consistently pursued an activist agenda targeting significant segments of the economy, including agriculture and even petfood in the wake of the 2007 US recalls. Is HSUS following the cliché, if you can’t beat ‘em, join ‘em—convinced it can do better?”

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Humane Choice is a dry kibble that is formulated to meet the nutritional needs of adult dogs and does not contain corn, dairy, artificial coloring, wheat, wheat gluten, animal-based protein or ingredients produced by genetic engineering, according to HSUS.  

Why has HSUS suddenly decided to throw its hat into the already flooded petfood arena?  

“IT WAS LARGELY because of the 2007 recalls that we decided to look into producing our own brand of petfood,” explains an HSUS spokesperson. “Pet owners lost confidence in the petfood industry, and we wanted to make sure there was a safe, organic, natural choice available in the marketplace.”

HSUS also advocated for federal legislation that passed Congress in 2007, requiring the Food and Drug Administration to set ingredient and processing standards for petfood, strengthen labeling requirements, establish an early warning system for contaminated food products and improve communication with the public and veterinarians during recalls, including a searchable online recall list posted on the agency’s website.

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HSU
committed to local, sustainable agriculture.”

**But why has** HSUS suddenly decided to throw its hat in to the already flooded petfood arena? “HSUS developed this new dog food to give consumers an additional choice in the marketplace for pet lovers who want a safe, natural, organic and nutritionally complete food for their adult dog that doesn’t support the factory farming industry,” explains the HSUS spokesperson. “It’s an opportunity to support our work confronting animal cruelty.”

An all-natural dog food may not seem like an obvious avenue for spreading animal cruelty awareness, but HSUS attests that’s precisely why it released its petfood line. “Every bag sold helps HSUS accomplish its mission to celebrate animals and confront cruelty,” states HSUS. “HSUS receives 6% of the wholesale price to help fund our critical lifesaving programs to rescue animals from disasters, provide spaying and neutering and other veterinary services, conduct undercover investigations of animal cruelty and more.”

**Does the Humane Society** have more plans for the petfood market? “We are exploring the opportunity to produce a canned adult dog food under the Humane Choice brand and also exploring a cat food that meets the unique nutritional needs of cats,” the HSUS spokesperson confides. “Pet lovers want not only a healthy and nutritious food for the animals in their families but also to know that they are making a difference for other animals around the world. With Humane Choice, we provide animal lovers an opportunity to make a difference.”

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Pet owners are increasingly seeking pet foods that seem more natural and closer to what pets would eat in the wild.

Are niche diets backed by science?

By Brittany M. Vester Boler, PhD

To date, little research has been done on grain-free or raw diets, especially in cats.

**Grain-free and raw** pet diets are increasingly appearing on store shelves, sought by pet owners seeking natural pet foods. Grain-free diets are pet foods that do not contain cereal grains, such as corn, rice or wheat. Raw diets are composed of raw skeletal muscle along with other ingredients (fiber, vitamins and minerals, etc.). While their presence in the marketplace is growing, very little research has been conducted on these diets except for a few studies on grain-free and raw pet foods for cats.

As **obligate carnivores**, cats require nutrients found only in animal tissue, yet most commercial cat diets today contain a large amount of carbohydrates. The increased carbohydrates and reduced protein in cat diets have been blamed for causing obesity in cats, but there are very little data to support this claim.

Currently, there is no direct comparison between grain-free and grain-containing diets. Recent research evaluated adult cats during gestation and lactation, kittens and adult cats after spaying when fed grain-free diets with different concentrations of protein and carbohydrate. Kittens fed the grain-free diets had the same body composition as kittens fed commercial diets (Vester et al., 2009a; Lauten et al., 2000). The adult cats were able to maintain
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What’s outside counts too.
body condition during gestation and lactation and had a similar body composition as adult cats fed commercial diets (Vester et al., 2009b; Lauten et al., 2000). This indicates that grain-free diets do not lead to large differences in body fat content of young cats.

Cats fed grain-free diets ad libitum before and for 24 weeks after spaying gained weight (1.3 kg) following spaying (Vester et al., 2009b). Compared to results from another study in our laboratory at the University of Illinois (Figure 1), cats fed a commercially available grain-containing diet ad libitum for 12 weeks after spaying gained a similar amount of weight (1.3 kg; Belsito et al., 2009).

These studies indicate that grain in the diet is probably not leading to weight gain after spaying; the increase is more likely due to removal of estrogen or testosterone and interactions with other hormones in the body.

**Microbial populations in** the large bowel can be influenced by grain-free diets. The grain in typical cat diets provides a fiber source to the animals and leads to carbohydrate fermentation in the colon. While cats are carnivorous and have a short large bowel compared with other species, they still have an active microbial population.

One study compared a baseline grain-containing diet with two grain-free ones (Lubbs et al., 2009). The baseline had higher fiber than either grain-free diet (8% versus 6% and 2%, respectively). Still, there was a two-log increase in a potentially pathogenic bacterium (*Clostridium perfringens*) and a one-log decrease in a beneficial bacterial genus (*Bifidobacterium* spp.) in cats fed the grain-free diets. The differences were likely due to the different amounts and types of fiber in the diets.

**Most research on** raw diets has focused on bacterial contamination. Many commercial raw diets have been reported to be contaminated with *Salmonella* spp., *E. coli*, *Salmonella typhimurium* and/or *Clostridium perfringens* (Freeman and Michel, 2001; Weese et al., 2005; Finley et al., 2008). Consumption of these diets can potentially lead to fecal shedding of bacteria. This means owners should take precautions when feeding these diets and disposing of feces.

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key studies evaluated raw meat diets:
- Cats were fed a high-protein, grain-free, kibble diet, raw beef diet or cooked beef diet (Kerr et al., 2008);
- The cats were fed four different raw meat diets based on beef, bison, elk or horse (Kerr et al., 2009); and
- Cats were fed commercially available beef or horse meat-based raw diets (Vester et al., 2010).

All the diets were grain-free; the beef diets in studies 1 and 3 contained beet pulp as a partially fermentable fiber source, while all other raw diets contained cellulose as a completely unfermentable fiber source. The studies’ authors measured digestibility.

Crude protein digestibility of the extruded kibble diet was 80%, while all the raw or cooked meat diets were at least 90% digestible (Figure 2, p. 38). Fat digestibility was lowest when cats consumed the kibble diet (approximately 92%) and the raw elk meat diet (approximately 87%). All other raw and cooked meat diets had approximately 95% or greater fat digestibility.

Fecal output was reduced by almost 50% when cats were fed raw or cooked meat diets compared to an extruded kibble diet (Kerr et al., 2008). This decrease in fecal output may be advantageous to pet owners.

**Though we need** more research on their health benefits, it is apparent that when formulated correctly, grain-free and raw diets provide adequate nutrition to cats. Feeding them comes down to the preference of pet owners. If they believe the diets make their pets healthier, there is a place for such products in the marketplace.

Dr. Brittany Vester Boler is a postdoctoral research associate with the Department of Animal Science at the University of Illinois.
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ACCORDING TO the article “HACCP: Where Did We Go Wrong?” by David Rosenblatt, DVM, ever since Dr. Paul LaChance of NASA and Dr. Howard Bauman of Pillsbury pioneered the use of CCPs (critical control points) in food production 50 years ago, HACCP (hazard analysis and critical control points) has become the most widely accepted system for managing food safety in the world. “There is no argument as to the effectiveness of the system when it is applied properly,” explains Rosenblatt. “However, poor implementation or abuse of the system can be devastating. Indeed, many of the recently widely publicized food safety incidents were caused by products originating from HACCP-certified plants.” So what can petfood manufacturers do to avoid such brand-threatening catastrophes?

Equipped with a better understanding of the system, the industry can apply and maintain more effective petfood safety management programs. As defined by Rosenblatt, HACCP is designed to identify, evaluate and control all food safety hazards associated with any food related process. “The methodology is based on establishing a precise process flowchart and identifying all significant food safety hazards at each step of the process,” he explains. “Those steps along the process at which effective control is applied are identified as CCPs and will be monitored accordingly.”

Examples of CCPs can include thermal processing, sieving, metal detection, acidification and high hydrostatic pres-
sure (see Figures 1 and 2). All of these steps divide the process into “before” the CCP (potentially contaminated) and “after” the CCP (always hazard free), states Rosenblatt’s article.

Unfortunately, a major weakness of HACCP is that it is not designed to address hazards not controlled as part of the process. Rosenblatt uses this example: A dry petfood manufacturer might choose the dryer as a CCP, because the time and temperature are sufficient for eliminating pathogenic bacteria. Because this step is a CCP, the time and temperature will be rigorously controlled and there will be no concern that contaminated product could proceed to packaging. However, if the product at the packaging line were to become contaminated with bird droppings, the result could be a Salmonella outbreak. “This is only one of many scenarios where HACCP was working well (CCPs under control), and a food safety incident occurred anyway,” he points out.

So what steps can you take to ensure this doesn’t happen on your manufacturing line? Stella & Chewy’s, makers of raw, natural dog foods and treats, has recently taken an innovative approach to ensure its products are safe for both families and pets.

“At this company, food safety is our first priority,” stated Marie Moody, Stella & Chewy’s founder and president, in a press release. “And we have the processes in place to prove it.” The company has developed a patent-pending SecureByNature system to guard against food contamination throughout the manufacturing plant. A key component of this system is the hydrostatic high pressure (HHP) process—a technology that actually eliminates harmful patho-

**Figure 1. High hydrostatic pressure on E. coli and Salmonella**
The effects of a high pressure treatment on the reduction of natural and antibiotic resistant E. coli and Salmonella. Error bars indicate the standard deviation from three individual trials.
&Chewy’s would be in the forefront of human food manufacturers and are years ahead of the petfood industry.”

It is crucial for the petfood safety specialist to acknowledge that HACCP is not designed to compensate for GMP shortcomings and that hazards controlled by GMPs are as significant as those being controlled by CCPs. “A HACCP program that is not regularly maintained and updated will quickly become obsolete,” asserts Rosenblatt.

“The most important aspect of maintaining the system’s validity is managing change.” Failure to evaluate the potential impact of changes prior to implementing them can be disastrous, Rosenblatt warns. The most effective way of managing this is to establish and implement a change procedure (see checklist on p. 42).

![Figure 2. High hydrostatic pressure on microflora](image)

The effects of a high pressure treatment on the reduction of background microflora in coarse ground beef. Error bars indicate the standard deviation from three individual trials.

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As of the time of this writing, initiation of the US Food and Drug Administration’s (FDA) pilot program to accept generally recognized as safe (GRAS) notifications for animal feed and petfood ingredients is still pending. However, in anticipation of the start of the program later in 2010, several presentations on the subject were given at the Association of American Feed Control Officials (AAFCO) meeting in January. Most interesting is how GRAS notifications compare and contrast with the other primary means to allow for use of new ingredients.

Table 1 summarizes the main differences in new ingredient options. Compared to the legally binding approval under the food additive petition (FAP) process through FDA, the AAFCO animal feed ingredient definition process consists of an informal FDA review of the data. Technically, an AAFCO-defined ingredient is still an unapproved food additive, but for all practical purposes, feed control officials are extremely unlikely to question the use of the ingredient in animal feed or petfood (provided it meets any specified conditions of use) regardless of the process employed.

While FDA does not make an independent judgment as to the safety of the subject of a GRAS notification, it is presumed that feed control officials will also consider a “no questions” response by FDA as sufficient tacit indication of ingredient acceptability.

An AAFCO definition generally requires less data than FAP, though the need to demonstrate safety and utility can still be sizable. Completion of either process can take years. Although a GRAS notification requires the same data as FAP, theoretically FDA should be able to respond to a GRAS notification faster than the other two options. However, the upfront time it may take the submitter to compile and evaluate the data can be longer than the other methods.

Any of the three options can be burdensome to the submitter in both time and resources required. In theory, a manufacturer may be able to bring the ingredient to market quicker through the GRAS notification process. However, the requirement for data to be freely accessible to the public may be difficult, if not wholly infeasible, in the case of a new ingredient. Also, a determination of GRAS by a firm typically requires that an expert panel be convened to review the data, which may add significant resource requirements compared with the other methods.

If data suggest a potential target animal, human food or environmental safety issue, FAP is usually most appropriate. In fact, if FDA determines existence of a safety risk during an AAFCO definition review, it most often will cease further review of the proposed definition and require the firm to submit an FAP.

Dr. Dzanis is a writer and consultant on nutrition, labeling and regulation. Tel: +1.661.251.3543; E-mail: dzanis@aol.com.

Get more
Read Dr. Dzanis’ previous column on GRAS at www.petfoodindustry.com/InsightsGRAS.aspx.
### Table 1: New animal feed and petfood ingredient options

Manufacturers have several paths to gaining approval for new ingredients for their petfood products.

<table>
<thead>
<tr>
<th></th>
<th>Food additive petition (FAP)</th>
<th>AAFCO feed ingredient definition</th>
<th>GRAS notification</th>
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</thead>
<tbody>
<tr>
<td><strong>Legal status</strong></td>
<td>Formal approval</td>
<td>Exercise of enforcement discretion after informal review</td>
<td>Legal notification</td>
</tr>
<tr>
<td><strong>Type of data</strong></td>
<td>Data can be confidential/proprietary</td>
<td>Data can be confidential/proprietary</td>
<td>Majority of data must be published in scientific literature or the public domain</td>
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<td><strong>Quantity of data</strong></td>
<td>Extensive</td>
<td>Less than FAP</td>
<td>Same as FAP</td>
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<td><strong>Data submitted to FDA</strong></td>
<td>All studies</td>
<td>All studies</td>
<td>Summary report</td>
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<td><strong>Party responsible for determination of safety</strong></td>
<td>FDA</td>
<td>FDA</td>
<td>Submitter</td>
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<tr>
<td><strong>FDA resources required</strong></td>
<td>High</td>
<td>Less than FAP</td>
<td>Less than FAP or AAFCO definition</td>
</tr>
<tr>
<td><strong>Submitter resources required</strong></td>
<td>High</td>
<td>Less than FAP</td>
<td>Potentially higher than FAP</td>
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<tr>
<td><strong>End result of positive FDA review</strong></td>
<td>Codified in Code of Federal Regulations (CFR)</td>
<td>Published in AAFCO Official Publication</td>
<td>&quot;No questions&quot; letter sent to submitter, posted on FDA website</td>
</tr>
<tr>
<td><strong>When can market ingredient</strong></td>
<td>After FDA approval</td>
<td>Ideally after definition accepted by AAFCO, but usually OK after FDA completes review</td>
<td>Legally upon submitter’s completion of GRAS determination, but prudent to wait until FDA responds</td>
</tr>
<tr>
<td><strong>Action needed to reverse determination</strong></td>
<td>Legal procedures by FDA required</td>
<td>FDA withdraws exercise of enforcement discretion, AAFCO definition deleted</td>
<td>FDA must show it is an unapproved food additive</td>
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<tr>
<td><strong>Details on process</strong></td>
<td>21 CFR 571</td>
<td>AAFCO Official Publication</td>
<td>Federal Register Notices Human - 62 FR 18937 Animal - pending</td>
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Effects of Glu-CS on serum fructosamine

Twelve healthy adult dogs received oral glucosamine chondroitin sulfate (Glu-CS) to determine whether such short-term supplementation alters serum fructosamine concentration. After three weeks, then a four-week washout period, the same dogs received a placebo for three weeks.

No significant change in serum fructosamine concentration was identified after treatment with either Glu-CS or the placebo. The change in serum fructosamine concentration associated with Glu-CS administration was not significantly different from the change in concentration associated with administration of the placebo.

Results suggest that in healthy dogs, short-term (i.e., 21 days) oral Glu-CS administration does not affect glycemic control or cause diabetes mellitus.


Omega-3 fatty acids and canine osteoarthritis

The objective of this study—among 127 client-owned dogs with osteoarthritis from 18 private veterinary clinics—was to assess the effect of dietary supplementation with fish oil omega-3 fatty acids on weight bearing in dogs with osteoarthritis.

At least in the short term, dietary supplementation with fish oil omega-3 fatty acids resulted in improvement in weight bearing in dogs with osteoarthritis.

A recent study evaluated the effects of fish oil omega-3 fatty acids on dogs with osteoarthritis. For six months, the dogs were randomly fed a commercial food or a test food containing a 31-fold increase in total omega-3 fatty acid and a 34-fold decrease in omega-6:omega-3 ratio. Owners completed a questionnaire about their dogs’ arthritic condition, and investigators performed a physical examination and collected samples for CBC and serum biochemical analyses.

Dogs fed the test food had a significantly higher serum concentration of total omega-3 fatty acids and a significantly lower concentration of arachidonic acid. According to owners, dogs fed the test food had a significantly improved ability to rise from a resting position and play at six weeks and improved ability to walk at 12 and 24 weeks.


Fish oil omega-3 and weight bearing in dogs with osteoarthritis

This study evaluated the effects of a food supplemented with fish oil omega-3 fatty acids on weight bearing in 38 client-owned dogs with osteoarthritis. The dogs were randomly assigned to receive a commercial food or a test food containing 3.5% fish oil omega-3 fatty acids. On days 0, 45 and 90, investigators conducted orthopedic evaluations and force-plate analyses of the most severely affected limb of each dog, and owners completed questionnaires about their dogs’ arthritis signs.

The change in mean peak vertical force was significant for the test-food group (5.6%) but not for the control-food group (0.4%). Improvement in peak vertical force values was evident in 82% of the dogs in the test-food group, compared with 38% of the dogs in the control-food group. Investigators’ subjective evaluations showed dogs fed the test food had significant improvements in lameness and weight bearing. At least in the short term, dietary supplementation with fish oil omega-3 fatty acids resulted in improvement.

Source: Roush et al., 2010. Evaluation of the effects of dietary supplementation with fish oil omega-3 fatty acids on weight bearing in dogs with osteoarthritis. JAVMA 236: 67-73. doi: 10.2460/javma.236.1.67
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- **H. H. Backer Spring Trade Show & Educational Conference:** April 23-25, 2010, Baltimore Convention Center, Baltimore, Maryland, USA. For more information, contact Backer at dharvey@hhbacker.com or [www.hhbacker.com/SpringTradeshow.asp](http://www.hhbacker.com/SpringTradeshow.asp).

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- **Interzoo 2010:** May 13-16, 2010, Exhibition Centre Nuremberg, Nuremberg, Germany. For more information, visit [www.interzoo.com](http://www.interzoo.com).

- **AFIA Feed Industry Institute:** June 14-17, 2010, Hilton St. Louis at the Ballpark, St. Louis, Missouri, USA. For more information, please contact akeller@afia.org or visit [www.afia.org](http://www.afia.org).

- **Expo Pack México and Processa 2010:** June 22-25, 2010, Centro Banamex, Mexico City, Mexico. For information on this event, please visit [www.expopack.com.mx](http://www.expopack.com.mx) or email mercadotecnia@expopack.com.mx.
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