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TOOO CINCUSTRY Volume 52 • Number 4

On the cover: Pet owners today are faced with an overwhelming number of petfood products and marketing claims. How do they sift through the information on your packaging? Photo by nruboc, BigStockPhoto.com







Digital version available at www.petfoodindustry-digital.com

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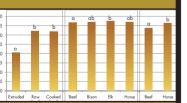
www.youtube.com/user/petfoodindustrytv



Online exclusives

PowerPoint: Communicating with pet owners about petfoods

Watch the Virtual Petfood Forum: Target Nutrition presentation from Kathryn E. Michel, DVM, at www.petfoodindustry. com/Whydobuy.aspx.



Presentation: The science behind grain-free and raw diets for cats

See more of Dr. Brittany Vester Boler's research on these niche petfoods at www.petfoodindustry.com/ SciencePowerpoint.aspx.



Checklist: HACCP step by step

For Dr. David Rosenblatt's complete checklist and guide to a safer, smooth-running manufacturing plant, visit www.petfoodindustry.com/HACCPlist.aspx.

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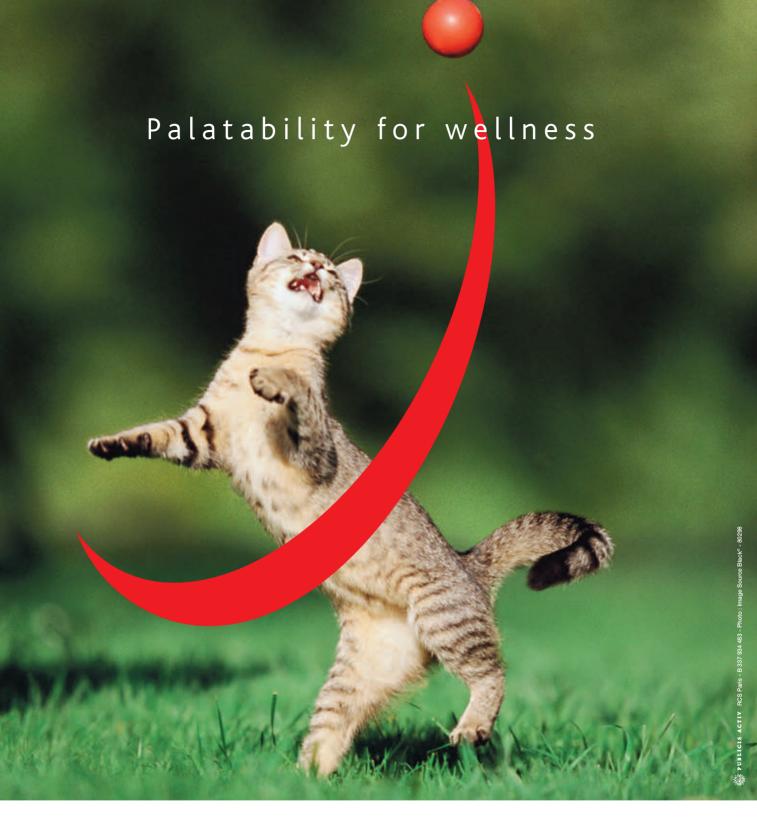
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Something to Chew On

Debbie Phillips-Donaldson

Find more

See the Petfood Forum 2010 presentation by David Lummis of Packaged Facts at www.petfoodindustry.com/
LummisForum2010.aspx.

Bright days ahead with a few clouds



Most signs point to continued growth for the US pet industry, but with some caution.

"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 rise 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 purchasers across channels and brands." 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% shop 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 rough 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 who went to mass merchandisers 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.

Debbie Phillips-Donaldson is editor-in-chief of Petfood Industry magazine. E-mail her at dphillips@wattnet.net.



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Industry News

Learn more

The latest news and updates are always on www.PetfoodIndustry.com.

Quick Hits

- NSF International announced a new strategic partnership with MET Laboratories.
- Ted W. Beaty, executive vice president and co-founder of elevator bucket company Tapco Inc., has retired.
- Buhler Aeroglide announced a license agreement with Ronning Engineering Co. Inc. that includes the use of Ronning's drying technology for specific market segments like biomass.
- Vortex Valves

 International
 appointed Oliver
 Küng as the new
 sales manager
 of Vortex Valves

 GmbH.

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.

Are you backing your claims with solid data?

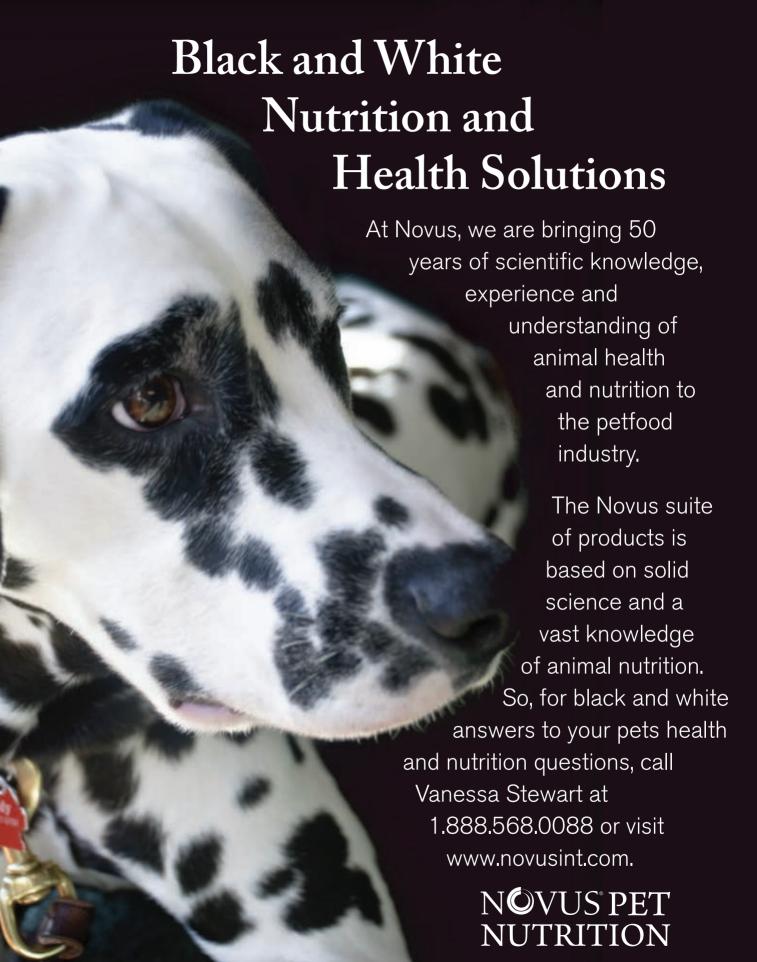


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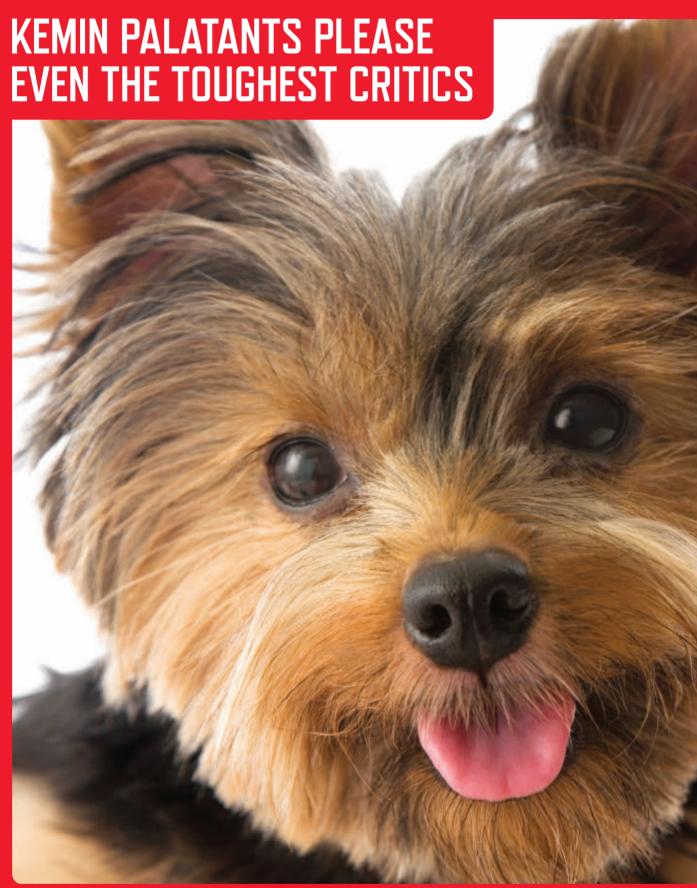
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Wagg unveils scented advertisement for dogs

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.



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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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For Consumers

Dog biscuits

Cranimals offers functional dog biscuits called Zendog, which are formulated with organic pumpkin extract and a concentrated source of tryptophan, according to

the company. The biscuits include cold-pressed cranberry seed oil, flax protein powder and the company's Original Cranberry Supplement. The biscuits are designed to help calm anxious dogs.

> Cranimals +1.866.762.6315 www.cranimal.com

Dog weight management formula

Holistic Select from WellPet/Eagle Pack Pet Foods offers Weight Management for Dogs. It's designed to have less fat and fewer calories to promote weight loss, according to the

company, and also contains L-carnitine. It has a fatty acid blend for healthy skin and coat.

WellPet +1.800.225.0904

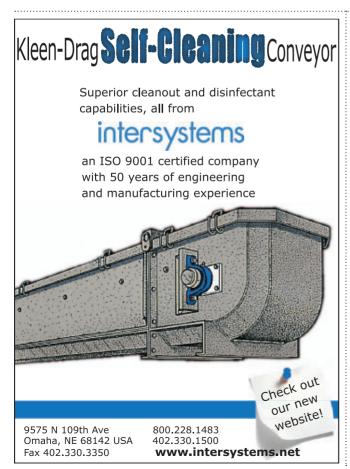
www.holisticselect.com



Tortoise formula

Tortoise MonsterDiets from Zeigler Bros. is a vegetable protein-based diet for herbivorous land tortoises. The formula uses protein and fiber sources blended with vitamins and minerals and is designed to promote growth, proper shell development and longevity. Ingredients include carrot, dandelion, celery, beet, parsley, lettuce and watercress.

> Zeigler Bros. Inc. +1.800.841.6800 www.zeiglerfeed.com





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For Consumers

Grain-free cat food

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breeds and lifestages. Green Pea & Chicken formula also is available.

Natural Balance Pet Foods Inc.

+1.800.829.4493 x145

www.naturalbalanceinc.com

Small, medium dog breed food

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

Small dog treats



Blue Dog Bakery offers Super Stars small dog treats. The baked treats are designed to help clean teeth and freshen breath. Each box comes with an assortment of flavors—Grilled Steak, Bacon and Roasted Chicken. Each treat contains 9 calories, according to the company.

> Blue Dog Bakery +1.888.749.7229

www.bluedogbakery.com

Superfood dog biscuits

Zuke's offers its Superfood Organic Dog Biscuit formulas in three flavors—Mean Greenz, Very Berryz and Health Nutz. All the flavors combine superfoods and a mixture of organic oats, barley and molasses.



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For Consumers

Antler chews

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Free Range Dog Chews Inc. +1.586.752.3040 www.freerangedogchews.com

Organic petfood line

The Humane Society of the United States has a certified-organic dog food line called Humane Choice. The food meets the nutritional levels established by the

Association of American Feed Control Officials for adult dog food, according to the society, and it is not tested on laboratory animals, is cruelty-free and does not contain

any fats or proteins derived from animals.

Humane Society of the United States +1.760.842.1073

HUMANE

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Loving Pets +1.866.599.7387

www.lovingpetsproducts.com







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For Manufacturers



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Online extra!

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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.



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

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

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



elect

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?



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Kathryn E. Michel, DVM, MS, DACVN, is an associate professor of nutrition in the Department of Clinical Studies in the School of Veterinary Medicine at the University of Pennsylvania. She is also a diplomat and current chair of the executive board of the American College of Veterinary Nutritionists.

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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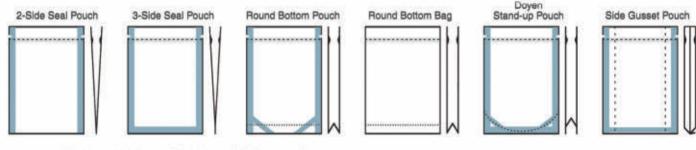
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such as being viewed as more ethical, better for the animal, more "natural" such as being viewed as more ethical, for the animal or safer than traditional diets. When pet owners turn to these unconventional diets in search of an answer to a pet's health 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?
- Educate your consumer base on your food and your diet and why it works!
- 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.

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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 formula-tions 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 feed 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
- Provide scientific information on the development of your petfood
- Don't be afraid to let nutritionists and veterinarians weigh in. Consumers want the facts from someone they trust!

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Read more!

To read and respond to Debbie Phillips-Donaldson's blog, "What do you think about the new dog food from HSUS?" go to http://www.petfood-connection.com/ profiles/blogs/what-do-you-think-about-the and join the discussion.

With a marketplace that has somehow remained incredibly resilient despite a worldwide recession, and recent legislation like the petfood tax in California aimed at establishing a statewide animal abusers registry, one thing's for certain, HSUS has made a very strategic move.

Petfood gets political



By Jessica Taylor

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

in the *New York Tmes*, 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?"

With a marketplace that has somehow remained incredibly resilient despite a worldwide recession, and recent legislation like the petfood tax in California



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.

largest animal protection organization not a petfood manufacturer—and has recently come under scrutiny by the Center for Consumer Freedom. The group, represented by blogger David Marosko, recently took out a full-page ad



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aimed at establishing a statewide animal abusers registry, one thing's

for certain, HSUS has made a very strategic move.



because of the 2007 recalls that we decided to look into producing our own Why has HSUS suddenly decided to throw its hat in to the already flooded petfood arena?

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

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.

2007, requiring the Food and Drug Adminstration 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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tional 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 the organization. "Our product is certified organic and does not contain any animal-based proteins or fats," says the HSUS spokesperson. "It is a complete and balanced natural formula made with fresh vegetables and grains."

Another representative for HSUS says the company employed the services of two different veterinary nutritionists, both members of the American College of Veterinary Nutrition, to evaluate the formula and ingredients as well as the specific forms of the vitamins and minerals used in Humane Choice to ensure

See for yourself!

To view a full package label and in-depth Q&A with HSUS, visit www.humanechoice.com. To learn more about HSUS, check out humanesociety.org.

that the vegan dog food would meet all the requirements established by the Association of American Feed Control Officials for adult dogs.

Currently, Humane Choice is available at Petco.com and select Whole Foods Markets in New York and New Jersey, USA. According to an HSUS spokesperson, the dog food will be in select Petco stores and additional Whole Foods Markets later this spring. Humane Choice is produced by a US Department of Agriculture (USDA) organic-certified grower

and manufacturer in Uruguay. "The family-owned and operated business has been growing grains and vegetables and making and exporting organic and vegetarian dog food for many years," HSUS explains.

Susan Thixton, the voice of TruthAboutPetFood.com, dug a little deeper and asked Sarah Barnett of HSUS to explain using an offshore manufacturer. "We sought a USDAcertified organic manufacturer with years of experience producing quality dog food and facilities that met our safety, sanitary and environmental expectations," says Barnett. "The selection of such a partner means that we can supervise harvest, production and packaging of Humane Choice in one location, through a single-source supplier

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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 animalsfrom 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 petfoods that seem more natural and closer to what pets would eat in the wild.

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 petfoods. Grain-free diets are petfoods 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 petfoods 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

Online exclusive!

Watch Dr. Vester Boler's presentation from Virtual Petfood Forum Target: Nutrition at www.petfoodindustry.com/SciencePowerpoint.aspx.

Eight out of ten pet food buyers are women. It's about time someone got a handle on that.



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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 graincontaining 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 grainfree 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 grainfree 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.

Figure 1. Body weight changes

Weight gain after spaying in cats fed grain-free diets vs. cats fed a grain-containing diet was similar.





Vester et al., 2009, Belsito et al., 2009

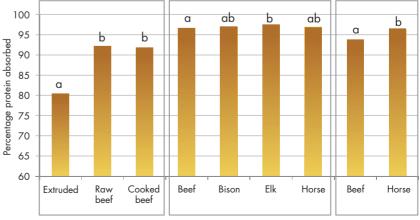
MOST RESEARCH ON raw diets has focused on bacterial contamination. Many commercial raw diets have been reported to be contaminated with Salmonella spp., E. coli, Salmonella typhimurium and/or Clostridium perfringens (Freeman and Michel, 2001; Weese et

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.

Though research is limited, three

Figure 2. Crude protein digestibility

One study of raw meat diets for cats compared the percentage of crude protein the cats were able to absorb and utilize.



Kerr et al., 2008; Kerr et al., 2009; Vester et al., 2009

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key studies evaluated raw meat diets:

- Cats were fed a high-protein, grainfree, 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

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at www.petfoodindustry.com/

ScienceReferences.com.

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meat diets compared to an extruded kibble diet (Kerr *et al.,* 2008). This decrease in fecal output may be advan-

tageous to pet owners.

THOUGH WE NEED more research on their health benefits, it is apparent that when formulated correctly, grainfree 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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The checklist

To make sure your HACCP system is running smoothly, keep the reins tight on a few key areas, Dr. David Rosenblatt recommends:

- Management of documents and records;
- Effective training:
- Calibration of measuring devices;
- Trend analysis;
- Continual improvement
- Management of change
- Identification and traceability; and
- Communication with customers
 Go to www.petfoodindustry.com/
 HACCPlist.aspx for Dr. Rosenblatt's complete HACCP step-by-step checklist and guide to a safer, smooth-running manufacturing plant.

The classic HACCP system is implemented under the working assumption that good manufacturing practices are in place and that hazards associated with poor practices have already been addressed. This is often a wrong assumption.



By Jessica Taylor

The latest on HACCP, GMPs and other programs to help you ensure the safety and quality of your petfood products

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 implemen-

tation 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-

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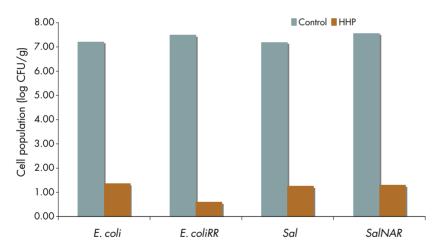
The American Feed Industry Association has designed an educational webcast,
 "Management Considerations for Salmonella/Microbial Control," to help feed and petfood industry personnel better understand how to control and manage Salmonella. Register for the webcast taking place on April 22, 2010, at www.afia.org.

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 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.



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,

gens without cooking out vital nutrients or changing the natural taste, says the company. HHP is the only scientifically recognized pasteurization method that does not use heat or irradiation to accomplish this.

"Our patented food safety process was designed by a professor of food safety at Kansas State University," says Sandy Goodman, CEO of Stella &Chewy's. "Experts have told us that the food safety programs at Stella

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&Chewy's would be in the forefront of human food manufacturers and are years ahead of the petfood industry."

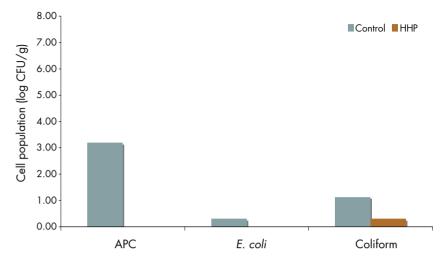
It is crucial for the petfood safety specialist to acknowledge that HACCP is not designed to compensate for GMP shortcomings and that hazards controlled by GMPs are as significant as those being controlled by CCPs. "A HACCP program that is not regularly maintained and updated will quickly become obsolete,"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

Online exclusive!

View a PowerPoint presentation by Galen Rokey of Wenger on how process hardware has an impact on petfood safety at www.petfoodindustry.com/ WengerImpact.aspx.

Figure 2. High hydrostatic pressure on microflora

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.



latt. "The most important aspect of maintaining the system's validity is managing change."

Failure to evaluate the potential impact of changes prior to imple-

menting 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).

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The pet food industry has had many new requirements pushed upon it with more to come. The recent recall has brought great attention to this sector and the regulations continue to tighten. Plus, with the idea of a pet as part of the family becoming more prevalent, the pet food industry is set for an exciting future with many new ideas coming to market.

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Petfood Insights

David A. Dzanis, DVM, PhD, DACVN

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Read Dr. Dzanis' previous column on GRAS at www.petfoodindustry.com/
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FDA lays out options for new ingredients



How do GRAS
notifications
compare with the
other primary means
to allow for use of
new ingredients?

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 defi-

nition 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.

Find more online

For more information, visit http://www.aafco.org/Portals/IDCIngredientDefinitions/tabid/166/Default.aspx and click on these presentations:

- Options for Including Ingredients in the Official Publication,
 Shannon Jordre, Center for Veterinary Medicine (CVM), FDA;
- Process Options for Substances Used in Feed, Mika Alewynse, CVM, FDA; and
- Animal GRAS Feed Notifications, Geoffrey Wong, CVM, FDA.

Table 1: New animal feed and petfood ingredient options

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

	Food additive petition (FAP)	AAFCO feed ingredient definition	GRAS notification	
Legal status	Formal approval	Exercise of enforcement discretion after informal review	Legal notification	
Type of data	Data can be confidential/ proprietary			
Quantity of data	Extensive	Less than FAP	Same as FAP	
Data submitted to FDA	All studies	All studies	Summary report	
Party responsible for determination of safety	FDA	FDA	Submitter	
FDA resources required	High	Less than FAP	Less than FAP or AAFCO definition	
Submitter resources required	High	Less than FAP	Potentially higher than FAP	
End result of positive FDA review	f positive FDA Codified in Code of Federal Regulations (CFR) Publish		"No questions" letter sent to submitter, posted on FDA website	
When can market ingredient	After FL)A approval		Legally upon submitter's completion of GRAS determination, but prudent to wait until FDA responds	
Action needed to reverse determination	Legal procedures by FDA required	FDA withdraws exercise of enforcement discretion, AAFCO definition deleted	FDA must show it is an unapproved food additive	
Details on process	21 CFR 571	CFR 571 AAFCO Official Publication		



Research Notes

Effects of Glu-CS on serum fructosamine

Twelve healthy adult dogs received oral glucosamine chondroitin sulfate (Glu-CS) to determine whether such short-term supplemen-

Key Concepts

- Effects of Glu-CS on serum fructosamine (JAVMA 236: 183-186. doi: 10.2460/javma.236.2.183) In healthy dogs, short-term glucosamine chondroitin sulfate supplementation does not affect glycemic control or cause diabetes mellitus.
- Omega-3 fatty acids and canine osteoarthritis (JAVMA 236: 59-66. doi: 10.2460/javma.236.1.59) 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
 (JAVMA 236: 67-73. doi: 10.2460/javma.236.1.67) 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.

tation 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, shortterm (i.e., 21 days) oral Glu-CS administration does not affect glycemic control or cause diabetes mellitus.

Source: C.E. Lenox and K.F. Lunn, 2010. Effects of glucosamine chondroitin sulfate supplementation on serum fructosamine concentration in healthy dogs. *JAVMA* 236: 183-186. doi: 10.2460/javma.236.2.183

Omega-3 fatty acids and osteoarthritis

The objective of this study—among 127 clientowned dogs with osteoarthritis from 18 private veterinary clinics—was to assess the effect of



food with high concentrations of fish oil omega-3 fatty acids and a low omega-6:omega-3 fatty acid ratio on clinical signs of the disease.

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.

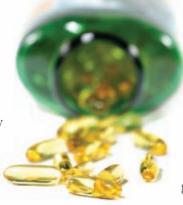
Owners completed a questionnaire about their dogs' arthritic condition, and investigators performed a physical examination and collected samples for CBC and serum biochemical analyses.

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.

Source: Roush *et al.*, 2010. Multicenter veterinary practice assessment of the effects of omega-3 fatty acids on osteoarthritis in dogs. *JAVMA* 236: 59-66. doi: 10.2460/javma.236.1.59

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



Recent studies have evaluated the effects of fish oil omega-3 fatty acids on dogs with osteoarthritis.

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 ssteoarthritis. JAVMA 236: 67-73. doi: 10.2460/javma.236.1.67





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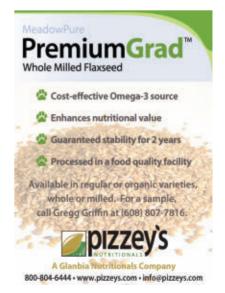
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- H. H. Backer Spring Trade Show & Educational Conference, April 23-25, 2010, Baltimore Convention Center, Baltimore, Maryland, USA. For more information, contact Backer at dharvey@hhbacker.com or www. hhbacker.com/SpringTradeshow.asp.
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- AFIA Feed Industry Institute, June 14-17, 2010, Hilton St. Louis at the Ballpark, St. Louis, Missouri, USA. For more information, please contact graller@afig.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 or email mercadotecnia@ expopack.com.mx.

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