bark & whiskers

Dog Tips Cat Tips

They're Bent on Banning This From Your Pet, but It's 'OK' for You to Eat?

Can you smell a dead rat? The stench is unmistakable; their evil acts inexcusable. For example, their treasonous acts against Darwin's. It's all the same meat, for goodness sake. These alarming warnings leave no doubt they'll stop at nothing to destroy raw pet food. Let's show them!

Analysis by <u>Dr. Karen Shaw Becker</u>

STORY AT-A-GLANCE

- It has become plainly obvious to anyone paying attention that the FDA has been targeting raw pet food producers for almost four years now
- It seems the FDA's illogical zero-tolerance pathogen policy for raw pet food may have been instituted for the sole purpose of targeting small fresh food companies and putting them out of business
- Some of these companies, along with some retailers and pet food advocates, have begun speaking publicly and taking a stand against the FDA's strong-arm tactics
- If you feed a commercial raw diet to your pet or are considering it, take the same commonsense precautions you would when handling and preparing raw meat and other fresh foods for human family members

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As the number of media-hyped raw pet food recalls continues to mount, it's clear the FDA is deliberately targeting the small companies that make these products. Four years ago, the agency — with its new zero tolerance policy on pathogens in pet food in hand — announced it would conduct large scale testing of raw diets (but not processed pet food) for E. coli, salmonella and listeria.¹

At the time, many viewed this move as clearly biased harassment of raw pet food companies, especially since historically, it's processed pet food that is routinely recalled for pathogen contamination. Since then, as the FDA continues to single out raw pet food producers for "special attention," many more people and organizations have begun to question the agency's motives.

What's Really Behind the FDA's Zero-Tolerance Policy?

The problem with the FDA's zero-tolerance policy is that it's an unrealistic and impractical goal when you're dealing with raw meat intended for consumption by cats and dogs, who have evolved with a much higher tolerance than humans for foodborne pathogens (dogs and cats naturally harbor these strains of bacteria in their gastrointestinal tracts, and regularly lick their bums, all without ever getting sick).

Most annoyingly, the FDA doesn't even have a zero-tolerance policy for USDA-inspected meats headed for supermarkets for human consumption (which are the same meats used for most raw pet foods). In other words, the FDA's standards for raw pet foods exceed those of food sold for human consumption. Here's how pet food retailer Dexter's Deli describes the situation in a posting on their website titled "Is the FDA out for blood?"

"The FDA has decided that, unlike other kinds of pet food or even the meat you purchase for yourself, they will have zero tolerance for any pathogenic bacteria in prepared raw pet food diets. They are targeting raw and minimally processed pet foods only, looking for any sign of E. coli, salmonella, or listeria.

This testing is not being done on dry or canned pet food, even though they have also been found to have these pathogens (not to mention the added danger of aflatoxins and mycotoxins in dry pet food, and the ongoing problem of dangerous hidden ingredients from large, less-than-honest companies).

This testing is also not being done in response to complaints. Yet they make no move to recall dry foods that are implicated in the deaths of many pets (even getting the attention of Congress).

The rates of contamination are quite low in raw pet foods, much lower than the meat you buy for your own meals. How does a 7% rate of pathogenic bacteria in pet food [versus] a 39 [to] 81% rate of antibiotic-resistant bacteria in meat for human consumption sound to you?"²

As Dexter's points out, we all should be concerned about what or who is driving the FDA's four-years-and-counting laser focus on raw pet food. Is there economic influence from large multinational corporations that own most of the largest processed pet food brands?

Is the FDA's Goal to Drive Raw Pet Food Companies Out of the Marketplace?

Sadly, some small raw pet food companies that have been around for years are in danger of being driven out of business, while others have felt pressured to change their processing methods to accommodate the FDA's absurd zero-tolerance rule — changes that inevitably deplete the nutrient value of raw food.

However, several raw pet food producers, retailers like Dexter's Deli, and pet food safety advocates are speaking out and taking a stand against the FDA's tactics. In January, raw diet producers Answers Pet Food and Hare Today Gone Tomorrow refuted FDA alerts regarding their products.

Hare Today stated on its **Facebook** page that it would not issue a recall for one of its chicken products because the FDA mishandled the samples it tested. The company alleges it did not receive chain of custody or cold chain verification from the FDA on any of the tested, supposedly contaminated samples.³ According to the journal American Veterinarian:

"Hare Today is among other raw pet food manufacturers that believe the FDA is unfairly targeting them with standards that are higher than those set by the US Department of Agriculture to test human-grade food."⁴

My friend and pet food safety advocate Susan Thixton discusses the Hare Today situation in depth in a January 24th post at her blog, **<u>Truthaboutpetfood.com</u>**.

Answers Pet Food also pushed back on an FDA alert on one of the company's tested samples, stating, "The initial sample sent from Nebraska may have been cross contaminated in the lab, transport or elsewhere and should not be considered a representative sample."⁵ You can get further details on the Answers FDA alert and the company's response in Susan's January 14th post **here**. In it, she writes:

"Opinion: This FDA warning leaves no doubt in my mind that FDA will go to any extreme, violate any law to destroy the raw pet food category. It is almost frightening to consider."

FDA Strong-Arm Tactics

One of the FDA's regular targets is Darwin's Natural Pet Food. In late March, the company issued a press release announcing it was disputing the FDA's latest warning regarding pathogens in its pet food:

"The FDA tested three lots of Darwin's poultry meals, produced in October and November of last year, and claimed to find the presence of Salmonella in them. Darwin's stated that the warning was inappropriate, as there is no inherent public health risk, and that customers were already aware of the situation as a result of the company's own communications."⁶

More importantly, explains Gary Tashjian, Darwin's president, "... our customers have told us that this food was consumed by their pets long ago, with no medical issues reported. The facts show that there is no safety risk here."

In a new and incredibly disturbing development, in both the press release and a letter to Darwin's customers, several of whom are clients of mine, Tashjian revealed the FDA let him know it was issuing the warning because Darwin's refused to turn over its customers' personal contact information — information the FDA demanded from them. In the letter to Darwin's customers (including myself), the company writes:

"We believe that the FDA chose to issue this warning not out of any concern for human or pet health, but in retaliation for our refusal to agree to their demands to provide them with our customers' confidential contact information. When we informed them that to do so would violate the terms of our privacy policy, they threatened to issue a public warning to pressure us into doing so. When we refused this request, the FDA gave us an ultimatum. Subsequently, they retaliated by issuing their warning."

This is outrageous behavior by a U.S. federal agency.

FDA's Impact on Your Ability to Provide Fresh, Raw Foods to Your Pet

Chelsea Kent of the Food Regulation Facts Alliance describes the impact the FDA's zero-tolerance policy and targeting tactics have on fresh, raw pet foods:

"Almost every raw pet food recall is an action by misinformed officials motivated by false information propagated by processed pet food manufacturers. Many once truly raw pet food companies have caved to FDA pressure to sterilize their products, which could increase risk of nutrient deficiency, endocrine-inhibiting plastic exposure, lipid oxidation/rancidity and pathogenic re-contamination. Other raw pet food producers are being bullied by State Departments of Agriculture and the FDA to follow suit, which will decrease your access to the freshest and cleanest pet products on the market. These companies are small, independent and don't make the big bucks because they purchase quality ingredients rather than industry trash.

This leaves them with minimal resources to hire lobbyists or lawyers to help understand and decipher policy, or risk continued bullying from regulators if they don't comply with pressure to recall unnecessarily.

Most small raw pet food manufacturers started their companies because they lost a pet to a corporate pet food giant's processed products, and so they set out on a mission to make better diets for other pet parents. Entire families and livelihoods are wrapped up in these small companies that are driven by passion, not profits, and these small operators have no support in their fight against regulators."

What You Should Know About Raw Pet Food Health Warnings

The FDA's decision to target raw foods isn't due to customer complaints or ill pets, and it isn't due to a massive recall or discovery of contaminants (such as pentobarbital). It's an offensive strategy to pursue this fast-growing segment of the industry to try and find a problem to highlight, to cast doubt and generate fear.

Thanks to the constant hectoring about the dangers of salmonella in raw pet food (when in fact, the problem has historically been much more prevalent in processed pet food), many pet parents remain concerned about feeding raw foods specifically because raw meat can contain salmonella bacteria.

The fact is that salmonella can be found in up to 36% of all healthy dogs and 18% of healthy cats regardless of the food they consume. Many pets harbor these bacteria as a part of their normal gastrointestinal (GI) flora and naturally shed salmonella organisms in feces and saliva regardless of what food they eat.

All non-typhoid salmonella species are ubiquitously present in the environment and reside in the GI tracts of many animals, including pets. The majority of human salmonellosis cases are acquired through ingestion or handling of contaminated dry pet foods and treats — not raw meat. Here's what you need to know about salmonella:

- Dry food and raw food can certainly harbor salmonella, so awareness is important.
- Regardless of what food you feed your pet, animals can naturally harbor salmonella that can be a risk to humans, especially if you or a member of your family is immunocompromised.
- The raw meat used in many commercially available raw food diets is human-grade, USDA-inspected and no different from the steak and chicken purchased for human consumption from a grocery store. It should be handled with the same safety precautions you use when you prepare meals for your family. It's all the same meat. Your kitchen counters, bowls, cutting surfaces and utensils should be disinfected whether the raw meat is intended for your pet or human family members.

9 Commonsense Tips for Feeding Raw

1. Thoroughly wash your hands with soap and water (for at least 20 seconds) after handling raw pet food, and after touching surfaces or objects that have come in contact with the raw food.

- 2. Thoroughly clean and disinfect all surfaces and objects that come in contact with raw pet food. First wash with hot soapy water and then follow with a disinfectant. You can also run items through the dishwasher after each use to clean and disinfect them.
- 3. Freeze raw meat and poultry products until you are ready to use them, and thaw them in your refrigerator or microwave, not on your countertop or in your sink.
- 4. Carefully handle raw and frozen meat and poultry products. Don't rinse raw meat, poultry, fish and seafood. Bacteria in the raw juices can splash and spread to other food and surfaces.
- 5. Keep raw food separate from other food.
- 6. Immediately cover and refrigerate what your pet doesn't eat or throw the leftovers out safely.
- 7. If you're using raw ingredients to make your own cooked pet food, be sure to cook all food to a proper internal temperature as measured by a food thermometer. Thorough cooking kills Salmonella, L. monocytogenes and other harmful foodborne bacteria.
- 8. Don't kiss your pet around the mouth, and don't let your pet lick your face. This is especially important after your pet has just finished eating raw food.
- 9. Thoroughly wash your hands after touching or being licked by your pet. If your pet gives you a "kiss," be sure to also wash your face.

Bottom line, follow the same safe handling precautions regardless of what you feed your pet, and be assured that responsible raw food companies perform due diligence to control potential pathogenic bacteria in a variety of nontoxic ways, including using phage technology, fermentation and lot testing to ensure each batch of product is safe for consumption.

Sources and References

¹ <u>FDA.gov, June 3, 2015</u>
² Dexter's Deli
^{3,4,5} <u>American Veterinarian, January 25, 2019</u>

⁶ BusinessWire, March 27, 2019