

SCIENCE ADVISORY PANEL**Tuesday, 6th of May 2014 at 1:30 PM****AGENDA****1. MEMBERSHIP**

1.1 Apologies for absence

2. DECLARATIONS OF INTEREST**3. MINUTES OF THE PREVIOUS MEETING (28TH JANUARY 2014)**

Paper 1

4. MATTERS ARISING

Minute 8: Clarification of the budget

Oral report

Minute 9: Approval of the corrected terms of reference

Paper 2

Minute 19: A systematic review on bovine TB

Oral report

Minute 25: Legal clarification on feline renal transplants

Oral report

Minute 27: *Memorandum* to committee Chairs - update

Oral report

5. MICROCHIPPING OF PUPPIES

Paper 3

Request from the Standards Committee

6. SAFETY OF COMMERCIAL PET FOODS

Paper 4

Request from the CEO

7. ANY OTHER BUSINESS

Oral report

- Ethic Review Panels

8. DATE OF NEXT MEETINGSTuesday, 15th October 2014 at 10:30**Dr. Rita Jorge***Head of Research*

RCVS Knowledge

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Meeting	Science Advisory Panel
Date	6 th May 2014
Title	Minutes of the meeting held on January 28 th 2014
Classification	DRAFT
Summary	Minutes of the Science Advisory Panel Meeting
Decisions required	By the Science Advisory Panel: Approval of minutes By Council: None
Attachments	Paper 1 – SAP May06 AI03 Minutes Last Meeting
Author	Dr. Rita Jorge Head of Research – RCVS Knowledge rita@rcvsknowledge.org

Science Advisory Panel

Minutes of the meeting held on January 28th 2014

Members:	Professor The Lord Trees	Chairperson
	Professor Elizabeth Simpson	
	Dr. Michael Francis	
	Professor Ewan Cameron	
	Ms. Andrea Jeffery	
	Dr. Bradley Viner	
In attendance:	Dr Rita Jorge	Committee Secretary

Apologies

1. Apologies were received from Professor Dirk Pfeiffer, Ms. Jacqui Molyneux, Dr. Tim Nuttall and Mr. Nick Royle.

Declarations of interest

2. Professor The Lord Trees is the Chairman of the Board for the Moredun Research Institute and holds a remunerated position as the Veterinary Editor in Chief of the Veterinary Record. He is also a cross-bencher at the House of Lords, with no political allegiance.
3. Dr. Michael Francis is an employee of a commercial company, MSD Animal Health.
4. Professor Ewan Cameron is the Head of the Veterinary School for the University of Glasgow and as a part of that role he has a remit in research governance. Professor Cameron is also responsible for a large veterinary referral service.
5. Dr. Bradley Viner is the chairperson for the Battersea Home for Cats and Dogs and vice president of the International Cat Care.
6. Professor Elizabeth Simpson occasionally performs consultancy services for the Wellcome Trust and the ERC.

Terms of reference

7. The chairman briefly introduced the origins of the Science Advisory Panel (SAP), with mention of the work of the now extinct Research Sub-committee.
8. The budget of the SAP was discussed and it was felt that clarification was needed with regards the actual values of the yearly budget. The main expenditure of the committee will be directed at commissioning background research work on topics which are relevant to the RCVS.

ACTION: Chair to clarify budget with Operational Board

9. It was felt that point 1.1 and 1.4 in the terms of reference should be changed. Point 1.1 should include mention to veterinary nurses. Additionally, in point 1.4 where it reads
“Protect the interests of those dependent on animals and assure public health by ensuring that the debate on veterinary issues is based on good evidence and sound advice”;

It should read:

“Ensuring that the debate on veterinary issues is based on good evidence and sound advice”;

ACTION: Secretary to correct TOR and approval to be sought from Operational Board

Modus Operandum

10. The scheme of delegation from the RCVS Council to Treasurer, Operational Board and Committees was presented to members (paper 3).
11. The Chair suggested that the major part of the work of the SAP should be project based. Expertise can be sought externally and work commissioned on a project-by-project basis, since it is not plausible to expect that panel members will have expertise on every issue.
12. It was agreed that the commissioned reports should be reviewed by the SAP as well as by independent peer-reviewers. Reports will then be submitted by the SAP to the RCVS Operational Board with the advice that they be accepted as the evidence-base underpinning any subsequent policy decisions, which are to be made by Council.
13. It was agreed that it would be beneficial if such reports were then submitted to independent peer reviewed journals for publication (in open access journals where possible). The advantages of this are twofold: a) the peer review process lends credibility to the reports and b) their wide dissemination stimulates debate among veterinary professionals, who are the ultimate owners of any document produced by this committee.
14. Members decided that for reports commissioned by the SAP:
- a. There will be well defined terms of reference;
 - b. There will be clear deadlines (2 – 3 months ideally);
 - c. Authorship will be selected by the committee either by appointment or tender process.
 - d. Authors will be paid a fee for their research;
 - e. The first assessment of reports will be done by the committee, which, as necessary, will then choose independent peer reviewers;
 - f. The SAP will then advise authors of the report to make amendments as suggested by reviewers;
 - g. When satisfied, the SAP will forward the finished report to the Operational Board as its recommendation;
 - h. Subsequent to receipt by the Operational Board, and its agreement, external publication may follow.

15. It was clarified that the mission of the SAP is not to make policy, rather to provide scientifically assured information to the RCVS. Based on the summaries of evidence commissioned by the SAP, the committee might recommend that the Operational Board take a certain view, but ultimately the role is an advisory one, directed at the Operational Board and ultimately Council.

A systematic review on Bovine TB

16. The Past Presidents' group submitted a request that the SAP consider commissioning a systematic review of the evidence for the different interventions for bovine TB.
17. It was felt that taking on this project would take the SAP considerably far from the remit of the RCVS, and into the area of advising on disease control. Such a review would not directly contribute to the regulatory activities of the college.
18. It was also felt that a systematic review would suggest the existence of more than a few clinical trials. At the moment the evidence base to sustain an extended meta-analysis or systematic review of the literature does not exist. The closest possibility would be to take up a critical analysis of the existing evidence base behind different bovine TB interventions. However, this work has already been done by Godfray *et al.* and the bTB Evidence Project. Their findings were recently published (Godfray HCJ *et al.*, 2013 A restatement of the natural science evidence base relevant to the control of bovine tuberculosis in Great Britain. Proc R Soc B 280: 20131634. <http://dx.doi.org/10.1098/rspb.2013.1634>).
19. It was decided that the Operational Board would be informed that the SAP was consulted regarding this issue. The recommendation to the Operational Board is that this should not be reviewed by the Panel because it represents a huge task that has essentially been done by others and its policy implications fall outwith the remit of the college.

ACTION: Chair to inform Ops Board

Feline Renal Transplants

20. The issue of safety of renal transplants for feline donors was referred to the SAP by the Standards Committee. Papers 5 to 5.3 (appended) were presented to the members and the author was congratulated on the quality of the written evidence.
21. The committee divided the issues raised by feline renal transplantation into four questions:
- a. Is the intervention beneficial to the recipient?
 - b. Is the intervention harmful to the donor?
 - c. Is the intervention ethical?
 - d. Is the intervention legal with regards to the Animal Welfare Act?
22. Questions a. and b. were directly related to verifiable science and were tentatively answered by papers 5 and 5.1. Question c. implies an ethics reflexion and question d. requires legal advice.

23. Regarding question a: A review of the literature in April 2013 found that moderate quality evidence exists that the median survival time after surgery can be between 1 and 2 years (for the recipient). Nonetheless, although some evidence exists that increased longevity might be an outcome of the transplant procedure, no enquiry was made into the quality of life of the recipient.
24. Regarding question b: No evidence of harm to the donor was found in the published literature, but the evidence base behind this statement is weak. The procedure is not necessary for the wellbeing of the donor animal so it cannot be said to be beneficial to it. On the other hand, it might be argued that there is indirect benefit where the donor kidney is derived from animals due to be euthanised and where a condition of their donation is that they be adopted by the owner of the recipient cat's household (as is the case in some American protocols).
25. Question d. was considered to be the most relevant question moving forward. If indeed the procedure was found to be illegal under the Animal Welfare Act then there would be no need to perform an ethical assessment. It was agreed that the Professional Conduct department should be consulted and that a legal opinion should be sought before any other steps are taken.

ACTION: Secretary to contact Prof Con and request legal advice

26. Subject to Prof Con advice (see 25. above) the SAP will commission an ethical assessment along the following lines:
- a. if the intervention was to be beneficial to the recipient animal (in terms of longevity and quality of life);
 - b. if the intervention was to be harmful to the donor and
 - c. if the intervention were to be not harmful to the donor;

Any other business

27. In line with its terms of reference, the SAP is ready and willing to provide scientific advice relevant to the work of other standing RCVS committees.

ACTION: Chairman to draft memo to other Committee Chairs

Date of next meeting

28. Due to clashes in the meeting schedule, the next meetings will have to be rescheduled. Confirmation will be sought for Tuesday May 6th at 1:30 and Wednesday 15th October at 10:30 am.

Meeting	Science Advisory Panel
Date	6 th May 2014
Title	Amended Terms of Reference for the Science Advisory Panel
Classification	Unclassified
Summary	The panel is asked to approve the terms of reference laid out in the attached paper.
Decisions required	Approval of the amended terms of reference
Attachments	Paper 2 – SAP May06 AI04 Amended TOR
Author(s)	Dr. Rita Jorge Head of Research, RCVS Knowledge rita@rcvsknowledge.org

Terms of Reference for the Science Advisory Panel

1. The Science Advisory Panel shall provide the scientific underpinning for RCVS functions, and in particular:
 - Advise on scientific issues relevant to the professional conduct of veterinary surgeons and veterinary nurses;
 - Advise on research-related issues relevant to the education of veterinary students in UK veterinary schools;
 - Advise on scientific issues relevant to recognised veterinary practice;
 - Ensure that the debate on veterinary issues is based on good evidence and sound advice; and
 - Advise on scientific issues at the request of Council or any of its committees or subcommittees.
2. The Science Advisory Panel shall report to the Operational Board.

Meeting	Science Advisory Panel
Date	6 th May 2014
Title	Microchipping of Puppies
Classification	Unclassified
Summary	<p>The Standards Committee discussed the issue of microchipping of puppies at a young age or under a certain weight and whether this could amount to the practise of veterinary surgery contrary to the VSA 1966 – which would mean that it would not be acceptable for lay people to do.</p> <p>Overall, the Committee agreed that the matter should be referred to the Science Advisory Panel, who they felt would be best placed to consider an evidence based review of the issues.</p>
Decisions required	Members are requested to consider the papers attached and decide if this topic is within the remit of the Science Advisory Panel and, if so, what steps should be taken to address the query.
Attachments	<p>Paper 3.1 - Extract from Standards Committee Minutes 23.01.2014</p> <p>Paper 3.2 - Extract from RCVS Supporting Guidance Chapter 27</p> <p>Paper 3.3 - Briefing on compulsory microchipping by the Microchipping Alliance</p> <p>Paper 3.4 - RCVS response Defra dangerous dogs consultation</p>
Author(s)	<p>Dr. Rita Jorge Head of Research, RCVS Knowledge rita@rcvsknowledge.org</p>

Vaccination Record Cards

24. The Chairman introduced the paper, noting that over the past year, the RCVS has received a number of queries from the profession about the responsibilities associated with completing vaccination record cards. In particular, the RCVS has been informed that a number of veterinary surgeons have found themselves in the position of being asked to provide a follow-up vaccination to a patient who is accompanied by a signed but otherwise blank vaccination card, i.e. a card that does not identify the patient.
25. There was discussion of vaccination record cards, certificates and the twelve principles of certification, including issues surrounding the identification of animals. It was suggested that veterinary surgeons should encourage their clients to permanently identify their animals.
26. It was commented that there may be some situations when the veterinary surgeon feels unable to give the second vaccination because he/she cannot be reasonably sure that the vaccination card relates to the same animal. It was agreed that in such situations, veterinary surgeons must use their own professional judgment and discretion to decide how much weight to attach to the record card and may, in certain situations, decide to advise the client to re-start the course of vaccinations.
27. Overall, it was agreed that new guidance should be produced and returned to the Committee in due course.
28. There was also discussion about the age at which pups may be microchipped. Concerns were raised about pups being microchipped at a young age (under 8 weeks) and / or under a certain weight, particularly whether this could amount to the practise of veterinary surgery. If so, it would not be appropriate for lay people to carry out the procedure unless there was a suitable exemption under Schedule 3 of the Veterinary Surgeons Act 1966. It was commented that the Microchip Alliance Group may be able to provide further information, including information about microchip failures. It was agreed that the matter should be referred to the Science Advisory Panel, who may be best placed to consider an evidence based review of microchipping pups at a young age or certain weight.

Action: Professional Conduct Department

Extract from RCVS Supporting Guidance Chapter 27

Microchipping

27.18 RCVS Council last approved guidelines on microchipping in February 2000 (*RCVS News*, March 2000). Following a review of these guidelines by the Veterinary Surgery Working Party, the following guidelines have now been agreed:

- a. implantation by methods other than the subcutaneous route, ear tag or bolus will generally amount to veterinary surgery in view of the potential for pain or stress or for spreading disease, and in some cases the likely handling difficulties;
- b. the repair or closure of the entry site, where necessary, will generally amount to veterinary surgery;
- c. sedation and analgesia are medical treatment and so amount to veterinary surgery. Depending upon the nature of the treatment which is necessary it may be lawful for it to be carried out by a suitably qualified veterinary nurse under veterinary direction or by the owner;
- d. the procedure may amount to veterinary surgery if there is special risk to the health or welfare of the animal.

27.19 The new advice strengthens the existing advice and makes clear that the RCVS considers the microchipping of horses within the nuchal ligament to be an act of veterinary surgery.



Microchipping Alliance Briefing Compulsory Identification



THE ADVISORY COUNCIL
ON THE
WELFARE ISSUES OF DOG BREEDING



Introduction

The Microchipping Alliance comprises animal welfare charities, assistance dog charities, veterinary organisations, dog membership organisations, and other organisations that are affected by dog issues.

The Microchipping Alliance wants to make permanent identification (microchipping) compulsory for all dogs, raise public awareness of microchipping and its benefits to all companion animals. The Alliance considers that the time is right for the government to make permanent identification mandatory and urges ministers to recognise the importance of this issue.

This briefing sets out the key findings of independent research compiled for the Alliance from May - October 2011 and sets out the economic consequences of:

1. maintaining the status quo of voluntary microchipping;
2. making it a legislative requirement that all dogs over six months old are microchipped within a set date of the legislation;
3. making it a legislative requirement that all dogs changing hands by sale or gift are microchipped as of the date of legislation.

Background: current situation

Existing legislation

- Under the Control of Dogs Order 1992, made under the authority of the Animal Health Act 1981, all dog owners are required to ensure their dog, with a few exceptions for working dogs, wears a collar with their name and address on it, or on a plate or badge attached to it if the dog is on a public highway or in a public place
- If the dog is not identified in this way, the order empowers a local authority officer to seize the dog as a stray under the Environmental Protection Act 1990.

Dog population

- Accurate figures on the UK dog population are difficult to obtain as there is no central database recording such numbers, but on the basis of data compiled by the Pet Food Manufacturers Association there appears to have been an increase over the last decade from 6.1 million dogs in 2000 to around 8 million dogs in 2011, with 22% of UK households now owning a dog.

Numbers of stray dogs

- In 2010/11, 126,176 stray dogs were handled by UK local authorities, a significant increase of 30% from the 2008 figure of 96,892. This follows the change in legislation during 2008 when responsibility for dealing with stray dogs was transferred from the police to local authorities alone.

Stray dogs returned to owners

- There has been a disappointing 2% fall in the number of stray dogs in the UK returned to their owners, from 61,908 in 2010 to 60,564 in 2011
- UK local authorities were unable to return over half (52%) of stray dogs in 2010/11, a total of 65,612 dogs, as they were unidentifiable
- The most recent data available for England alone show that 48% of stray dogs were unreturned to their owner by local authorities in 2010/11. This amounts to a total of around 43,000 dogs
- Microchipping assisted in the return of 19,380 dogs in 2011, down from 21,667 in 2010. This represents a decrease in the proportion of dogs returned through microchipping from 35% in 2010 to 32% in 2009. This decrease shows why the extra push for compulsion is needed and that the voluntary scheme has plateaued.

Rehoming and euthanasia

- There has been a notable increase of 18% from 6,404 in 2010 to 7,571 in 2011 of the number of dogs being put to sleep by local authorities. Though some local authorities may merely be passing on that responsibility to charities
- After local authorities have kept non-returned stray dogs for the statutory seven days, (apart from those dogs put to sleep) they are re-homed either directly or by being given to animal charities. The average length of stay in kennels run by the RSPCA, Dogs Trust, Wood Green The Animals Charity, The Blue Cross and Battersea Dogs & Cats Home is 30.5 days
- On the basis that 27,173 stray dogs, were placed by English local authorities in animal welfare establishments for potential rehoming during 2010/11, they required an estimated total of 828,776 kennelling days.

Fees charged by local authorities

- Over and above the statutory fee of £25, there is considerable variation and inconsistency in the fees charged by local authorities to dog owners for return of their stray dog. Daily reclaim charges for local authorities surveyed vary between £25 and £79, and seven day reclaim charges range from £85 to £185.

Permanent identification of dogs

Why microchipping?

Microchipping was first introduced into the UK in 1989 and is internationally recognised as a permanent method of identification that greatly improves the identification and traceability of dogs and their owners. The EU recognises it in the Rabies Directive 2003/998/EC.

The most important reason for microchipping is to enable a lost or straying dog to be returned promptly to its owner. Permanent identification has a number of advantages over the use of a collar and tag. Some dogs are not left with their collar on at all times and dogs stolen from owners' premises are likely to have their collars removed if they are wearing them at the time. Permanent identification is effective at all times and is impossible to alter and extremely difficult to remove.

However, the microchip number itself is meaningless. Owners need to register the microchip number as well as their details with an appropriate computerised database. A PIN number is needed to access each of the databases and they can only be accessed by authorised bodies such as animal wardens, the police, animal welfare centre personnel and vets. It is essential that the databases are kept up to date and that dog owners update their personal details. It is also vital that any database is available 24 hours a day, and all databases are compatible and communicate with each other.

Current number of dogs microchipped

- It is estimated by Dogs Trust that, on the basis of results from a random sample survey of dog owners in 2008, around 59% of all dogs in the UK are microchipped
- Petlog (the largest UK database) similarly calculate that around 4.6 million out of 8 million dogs are registered, equivalent to 58%
- However, an online survey demographically representative of the UK's pet population, undertaken by PDSA in 2010, indicates the figure may be as high as 70%
- Nonetheless, the proportion of stray dogs in the UK already microchipped based on records of stray dogs, is currently estimated to be only 23% of strays received and 32% of dogs returned to their owners
- So whilst the proportion of microchipped dogs is over 50%, it is clear that some irresponsible dog owners are costing the tax payer money.

Welfare benefits of microchipping

There are clear welfare benefits for dogs that are microchipped, in particular the ability to rapidly identify a stray or lost dog and return it to its owner, so reducing kennel time. Rapid return also allows local authority officers to emphasise to the dog owners concerned that straying is not acceptable, the intention being that this education will lessen the likelihood of the dog straying again.

Additional welfare benefits include

- reinforcement of responsibilities of the owner under the Animal Welfare Act 2006 by reuniting an animal to its owner
- easier identification of owners who persistently allow their dogs to stray or cause nuisance
- all puppies being traceable to their breeder thereby helping reduce the problem of puppy farming of dogs; and lessening the incidence of infectious disease and inherited defects from which many of these dogs suffer
- deterrent to dog theft
- assistance in resolving ownership disputes
- easier identification and subsequent arrest of owners culpable of animal cruelty
- enables veterinary surgeons to contact dog owners for emergency procedures
- allows identification of dogs in properties in emergency situations so that dogs and owners can be moved and reunited more quickly.

International experience

- Some countries have introduced national compulsory microchipping for dogs including: France, Denmark, Slovenia, Switzerland, the Netherlands, Spain, Portugal, Canada, Hong Kong, Israel and Japan. In other countries, certain regions or areas have done so, for example, Prague in the Czech Republic, and several states in Australia
- In some European countries with compulsory microchipping, there are high levels of compliance with 80% to 90% of dogs estimated to be microchipped
- Evidence available from those countries, that have introduced compulsory microchipping, indicates clear welfare benefits, particularly in terms of increased proportions of stray dogs being returned to their owners
- In Sweden it is a legal requirement for dogs to be registered and permanently identified from four months of age. Dogs must be registered with the Swedish authorities within four weeks of being transferred to a new owner. As a consequence, over 90% of stray dogs are reunited with their owners within 24 hours of being collected by the authorities.

Introducing compulsory microchipping

Regulations to make the microchipping of all dogs compulsory could be achieved by repealing the existing Control of Dogs Order (1992), but retaining the collar and tag element, and introducing new regulations under Section 12 of the Animal Welfare Act 2006.

Economic Costs and Savings

The cost of enforcement is unlikely to be significantly different to the current enforcement of the Control of Dogs Order and the local authority duty under the Environmental Protection Act. Local authorities have already been provided with microchip readers and all dog wardens should already be equipped with them. Most veterinary practices are also already equipped with scanners.

The table overleaf sets out three potential options available to government relating to microchipping alongside the costs and savings of implementing and enforcing each.



Table 1: Cost impacts of alternative microchipping options

	Option One: Maintaining the status quo of voluntary microchipping	Option Two: The legislative requirement that all dogs changing hands by gift or sale are micro-chipped as of the date of legislation, plus all dogs over 6 months are microchipped within a certain date of the legislation (probably one year later)	Option Three: The legislative requirement that all dogs changing hands by sale or gift are micro-chipped as of the date of legislation
Implementation Costs	None	£10-£30 per dog microchipped x 3.8 million dogs. Aggregate cost £38 - £114 million. One-off cost borne predominantly by dog owners. Cost of public information advertising, which animal welfare organisations may be willing to contribute to. Cost to set up a single national government-run database (if required) plus £300,000 p.a. running costs.	£10-£30 per dog for microchipping x 670,000 dogs p.a. Aggregate cost of £6.7 million to £20.1 million p.a. One-off cost borne predominantly by dog breeders and sellers. Cost of public information advertising, which animal welfare organisations may be willing to contribute to. Cost to set up a single national government-run database (if required) plus £300,000 p.a. running costs.
Enforcement Costs	Dog warden service: £25.9 million p.a. Putting stray dogs to sleep: £196,290 p.a. Kennelling of stray dogs by local council for statutory 7 days: £3.5 million p.a. Kennelling of stray dogs by animal welfare organisations after 7 days: £18.2 million p.a.	Dog warden service: £25.9 million. Based on 90% compliance, the other enforcement costs detailed under Option One should reduce by 90%.	Dog warden service: £25.9 million Based on 90% compliance, the other enforcement costs detailed under Option One should reduce cumulatively by around 9% p.a. for 10 years.
Cost Savings	None. Could be some savings if there was an increase in the level of voluntary microchipping, but the proportion of stray dogs returned through microchipping fell by 3% between 2010 and 2011.	Based on 90% compliance: Reduced local council kennelling costs for statutory 7 days: £3.1 million p.a. Reduced animal welfare organisation costs for kennelling unreturned dogs after statutory 7 days: £16.4 million p.a. Reduced costs from fewer dogs put to sleep: £176,660 Extra income from administration charges recouped from stray dog owners of £1.1 million to £3.5 million p.a.	Based on 90% compliance, approximately 10% of the savings listed under Option Two would accrue cumulatively p.a. for 10 yrs: Reduced local council kennelling costs for statutory 7 days: £310,000 p.a. Reduced animal welfare organisation costs for kennelling unreturned dogs after statutory 7 days: £1.64 million p.a. Reduced costs from fewer dogs put to sleep: £17,660 Extra income from administration charges recouped from stray dog owners of £110,000 to £350,000 p.a.
Estimated total cost savings	None	Approximately £20.8 million to £23.2 million p.a.	Approximately £2.08 million to £2.32 million p.a. incrementally each year.

N.B. All costs relate to England alone

Summary

The Microchipping Alliance considers that the introduction of compulsory microchipping should help to improve animal welfare by reuniting stray and lost dogs with their owners more quickly and also provide government with solutions to a large number of issues relating to irresponsible dog ownership.

A cost impact analysis of three possible legislative options as outlined above estimates that Option Two, is by far the most beneficial option in terms of cost savings. The annual cost savings relating to dog welfare alone would be between £20.8 million to £23.2 million, at minimum, from the first year of introducing the legislation.

Nonetheless, there would also be notable cost savings resulting from the introduction of Option Three. If this option were pursued there could be incremental annual costs savings over ten years ranging from at minimum £2.08 million to £2.32 million, amounting to between £20.8 million and £23.2 million after a decade.

If the government decided to take no action to make microchipping compulsory, there would be no cost savings to be gained and such inaction also goes against public attitudes which indicate that 83% are strongly in favour of compulsory microchipping.

Henry Hoppe Esq
Defra
Animal Welfare Act Implementation Team
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Website: www.rcvs.org.uk

3 June 2010

Dear Mr Hoppe,

Re: Defra Consultation on dangerous dogs

Thank you for the opportunity to comment on the current legislation relating to dangerous dogs and the options proposed by Defra as a means to improve the situation in England and Wales.

The following response is made on behalf of the Royal College of Veterinary Surgeons (RCVS). The RCVS is the regulatory body for veterinary surgeons in the UK. The role of the RCVS is to safeguard the health and welfare of animals committed to veterinary care through the regulation of the education, and ethical and clinical standards of veterinary surgeons and nurses, thereby protecting the interests of those dependent on animals, and assuring public health. It also acts as an impartial source of informed opinion on relevant veterinary matters.

The RCVS welcomes the review of current legislation and strongly endorses the 'deed' rather than 'breed' approach to the control of dangerous dogs. This is largely because identifying that a dog is one of the breeds or types specified under the Dangerous Dogs Act is notoriously difficult. The RCVS considers that legislation in this field should seek to protect the public against dogs that are dangerously out of control, whilst ensuring that the welfare of any individual dog is not compromised. To this end, the College ultimately considers that all breed-specific references should be removed from the legislation relating to dangerous dogs

The RCVS supports the compulsory microchipping of all dogs and considers that such a policy would have an important role to play in the control of potentially dangerous dogs, on the grounds that the accurate identification of an animal and its owner is crucial to the enforcement of legislation and to achieving successful prosecutions. Moreover, the RCVS considers that permanent identification would have a positive effect on animal welfare. I have enclosed the RCVS position statement on the 'Compulsory Permanent Identification of Dogs'. This paper provides further background as to the views of the RCVS on the benefits of compulsory microchipping.

In order to be effective, any legislation requiring the compulsory microchipping of dogs would need to be enforced. The RCVS does not consider that veterinary surgeons should be

expected to 'police' any policy of compulsory microchipping, as this could have a negative effect on animal health and welfare. If, for example, it were widely known that veterinary surgeons routinely scan all dogs coming into their practices to check for the presence of a microchip, it might deter those with dogs that are, for whatever reason, not microchipped, from taking their animals to a veterinary surgeon. If, therefore, compulsory microchipping were to be introduced it should not be the role of a veterinary surgeon to act as 'police officer' as to do so could adversely affect the relationship between veterinary surgeon and client. For the above reasons, the RCVS does not advocate the mandatory scanning of dogs entering veterinary practices. To provide further clarification on this point I have attached the RCVS position statement on 'The Routine Scanning of Dogs and Cats for Microchips'.

The RCVS also has concerns regarding the age at which dogs have microchips implanted and the training given to those responsible for implanting microchips. The RCVS considers that it is imperative that the veterinary profession is involved in the development of any legislation concerning the compulsory microchipping of dogs, in order to determine protocols for the age at which microchipping is performed. Furthermore, there is currently no legislation as to who can implant microchips in the UK. RCVS guidance states that microchipping should only be undertaken by a veterinary surgeon when it is via a method other than the subcutaneous route, ear tags or bolus. As dogs are microchipped subcutaneously there is currently no requirement for a veterinary surgeon to perform the procedure. However, poorly implanted chips can lead to severe injuries during implantation, increased risks of microchip migration and may have adverse effects on diagnostic techniques such as MRI. The RCVS therefore considers that if microchipping were to be made obligatory then appropriate standards of training for those charged with implanting microchips would need to be developed, through a process of thorough consultation with the veterinary profession.

If you require any clarification on the above comments, please do not hesitate to contact me. Alternatively, representatives from the RCVS would be happy to meet with you to discuss and expand upon our position.

Yours sincerely,

Anthony Roberts
RCVS Policy and Public Affairs Officer

RCVS POSITION

MARCH 2010

COMPULSORY PERMANENT IDENTIFICATION OF DOGS

1. The Royal College of Veterinary Surgeons (RCVS) supports the compulsory permanent identification of all dogs, on the grounds that the accurate identification of dogs has a positive impact on animal welfare and may assist in the control of dangerous dogs. Microchipping is the predominant form of permanent identification and as such it provides the focus of this position statement. The RCVS, however, also acknowledges that other forms of permanent identification such as tattooing exist and are effective.

REASONS FOR SUPPORTING COMPULSORY MICROCHIPPING

2.
 - a. Microchip identification provides an accurate and efficient means of returning stray dogs to their owners and may also serve to reduce incidents of the abandonment or theft of dogs.
 - b. Microchipping puppies prior to sale could assist in identifying where dogs were bred and help to reduce the poor breeding practices that can lead to inherited defects and diseases. The 'indelible identification' of all puppies by 'microchip or other such equivalent system as may be developed' was one of the recommendations of the Independent Inquiry into Dog Breeding (2010) led by Professor Sir Patrick Bateson.
 - c. Permanent identification, such as microchipping, has an important role to play in the control of potentially dangerous dogs as the accurate identification of animal and owner is crucial to the enforcement of legislation and to achieving successful prosecutions.
 - d. Permanent identification could have a role to play in the control of an exotic disease, such as Rabies, should an outbreak occur. If, for example, all dogs were required to be microchipped, it could assist in the quick identification of vaccinated animals and the enforcement of restrictions on movement.
 - e. As a regulator, the RCVS recognises that the unequivocal identification of dogs is an essential part of correct certification.
 - f. Microchipping can assist veterinary surgeons by helping them to identify the animal being presented, retrieve clinically-relevant details and establish whether it is covered by pet insurance.

CONCERNS

3. Whilst in principle supporting the compulsory microchipping of dogs, the RCVS considers that there are certain issues that should be addressed before the implementation of legislation.
 - a. In order to be effective, any legislation requiring the compulsory microchipping of dogs would need to be enforced. The RCVS does not consider that veterinary surgeons should be expected to police any policy of compulsory microchipping as this could have a negative effect on animal health and welfare. If, for example, it were widely known that veterinary surgeons routinely scan all dogs coming into their practices to check for the presence of a microchip, it might deter those with something to hide from visiting. Moreover, if a dog is found to be registered with a different owner from the one presenting the animal this would raise the question of whose responsibility it would be to sort out the problem and whether a vet would be required to report this to the authorities - it is not the role of a veterinary surgeon to act as police officer and to do so could adversely affect the relationship between vet and client.
 - b. Microchips are, as the name suggests, very small (about the size of a large grain of rice) and the procedure of implanting the chip is generally considered to be safe and relatively painless, nevertheless animal welfare concerns have been raised regarding the implantation of the chips in young puppies and especially in small breeds of dog. It is imperative that the veterinary profession is involved in the development of any legislation concerning the compulsory microchipping of dogs, in order to determine protocols for the age at which microchipping is performed.
 - c. Poorly implanted chips can lead to severe injuries during implantation, increased risks of microchip migration and may have adverse effects on diagnostic techniques such as MRI scanning. Appropriate standards of training for those charged with implanting microchips must be developed, through a process of thorough consultation with the veterinary profession.

ENDS

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RCVS POSITION

OCTOBER 2008

THE ROUTINE SCANNING OF DOGS AND CATS FOR MICROCHIPS

The RCVS Advisory Committee considered the mandatory scanning for microchips in April 2003 and decided that it was not the role of veterinary surgeons to 'police' their clients.

The College's guidance to veterinary surgeons recommends that scanning should be carried out on any stray animals brought into the surgery, or those suspected of being stolen, or in cases where the owner is not aware if the animal has been chipped.

If a pet is found to be registered with a different owner from the one presenting the animal this would raise the question of whose responsibility it would be to sort out the problem – it is not the role of a veterinary surgeon to act as police officer.

The RCVS is also concerned that if it were widely known that veterinary surgeons routinely scan all dogs and cats coming into the practice, this might deter those with something to hide from visiting. This could have a negative impact on animal health and welfare.

Individual vets are free to set their own policies on microchip scanning and some may choose to make routine checks. However, for a vet to scan every new pet that came in to the practice, and to check this against the relevant database, might not be practical.

In addition, the databases of owner records held by microchipping companies might not always be up to date, so embarrassment could be caused to entirely innocent clients if pet ownership could not be proved.

On the rare occasions when such a client arrives with an animal that has a microchip registered in another person's name, both parties, with mutual consent, can be put in touch with each other.

However, if the client declines to consent to the release of his or her name and contact details, the *RCVS Guide to Professional Conduct* states that a veterinary surgeon may pass these details to the Petlog Reunification Service, even if this necessitates a breach in client confidentiality.

ENDS

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Meeting	Science Advisory Panel
Date	6 th May 2014
Title	Safety of commercial pet foods
Classification	Unclassified
Summary	<p>The RCVS was approached by a member of the profession concerned about the safety of commercial pet foods and alleged conflicts of interest between commercial pet food companies and the teaching on veterinary nutrition in UK universities.</p> <p>The Panel is asked to consider whether it feels it is appropriate to commission further peer-reviewed evidence on this issue.</p>
Decisions required	<p>The Panel is asked to decide on whether a report should be commissioned on this issue and, if so, to define the parameters of such a project.</p>
Attachments	<p>Paper 4 - Home prepared diets and companion animals (2012)</p> <p>Paper 4.1 - RCVS Position December 2004</p> <p>Paper 4.2 - RCVS Position February 2006</p> <p>Paper 4.3 - BVA's position</p> <p>Paper 4.4 - BVA's policy brief</p> <p>Paper 4.5 - Rebuttal of BVA's policy brief by the UKRMB</p> <p>Paper 4.6 - JAVMA published review (2013) <i>Current knowledge about the risks and benefits of raw meat-based diets for dogs and cats</i></p>
Author(s)	<p>Dr. Rita Jorge</p> <p>Head of Research, RCVS Knowledge</p> <p>rita@rcvsknowledge.org</p>

Commercial foods vs. Raw Meat Diets for Companion Animals

1. The debate on whether companion animals (namely cats and dogs) should be fed 'natural raw diets' or commercially available preparations has been happening within the veterinary profession for a considerable number of years and the RCVS has been asked to participate in these discussions several times.
2. The debate suffers both from inflammatory statements from certain quarters, from a financial imbalance between promoters of the 'raw meaty bones' diet and commercial pet food companies but perhaps most seriously from a lack of concrete evidence for the benefits or detriments of feeding a raw meat diet as against a commercial tinned or dry diet.
3. The UK Raw Meaty Bones Support and Action Group (UKRMB – www.ukrmb.co.uk) "promotes the feeding of a diet based on whole carcasses or raw, meaty bones and a few table scraps". It accuses the pet-food industry of "producing products that injure the health of a majority of the world's pets" and it has gained some traction in some spheres of public life. Most notably, in November 2005 an Early Day Motion was laid down by Mr David Lepper MP and by Mr David Taylor MP in December 2004. The RCVS has issued a position both times (papers 4.1 and 4.2 attached).
4. In both position papers the RCVS states that the College "does not exist to represent the views of veterinary surgeons and is not in a position to commission authoritative scientific research on the nutritional benefits of pet foods". It also adds that it does not "have the power to conduct an independent inquiry into the role of pet food manufacturers or the veterinary profession's role in recommending processed pet foods to their clients".
5. Under the Veterinary Surgeons Act 1966, the RCVS has the duty to protect the public interest, investigating complaints submitted against those in the RCVS Register. It is under these auspices that the UKRMB requests the RCVS' intervention. The petitioners defend that there is sufficient evidence to claim that commercial pet foods are 'poisonous' to companion animals. This would mean that knowingly recommending these foods would equal to malpractice and therefore would fall within the remit of the RCVS.
6. The British Veterinary Association has issued statements and policy briefs on the matter (paper 4.3 and paper 4.4 attached) which were rebutted by the UKRMB (paper 4.5 attached). The RCVS Education and Professional Department have received numerous enquiries in the last 12 years on the matter. In 2011 a document was produced on request of the Education department to place the debate in a wider context (paper 4 attached).
7. Most importantly in late 2013 (December) a review of the evidence concerning raw meat-based diets was published in the Journal of the American Veterinary Medical Association (JAVMA). The paper by Freeman *et al.* (paper 4.6 attached) reviews many of the studies looking at basic issues such as the effects of cooking on digestibility and the risks of nutritional inadequacy and infectious organisms in raw diets.

8. It should be noted that this study does not explicitly mention the literature searched, and there is therefore no way of knowing if the search was comprehensive, covering the appropriate databases and using the correct search terms. It is also not possible to know what the criteria were to include or exclude papers from the review.
9. The main conclusions of this study are quoted below:
 - There is no long-term supportive evidence for the claim that raw meat diets they are a safe and natural way to promote animal wellness.
 - Raw meat has an inherent risk of bacterial and parasitic contamination, and animals that consume raw meat diets may pose a risk to other pets and people in the household and surrounding community, including veterinary surgeons and veterinary support staff.
 - On the basis of published diet reviews, most home-prepared diets (both raw and cooked) are deficient in 1 or more essential fatty acids, vitamins, or minerals or a combination thereof. Although the perceived benefits of home-prepared diets may be reinforced daily to owners through a pet's appetite or coat quality, nutrient deficiencies and excesses in adult animals are insidious and can lead to long-term complications if not detected and corrected.
10. The Science Advisory Panel is asked to consider the issue and deliberate on whether it feels it is necessary to commission further peer-reviewed evidence on this issue, on behalf of the RCVS.
11. The book "Raw Meaty Bones" by Mr. Tom Londsedale has been offered to all Science Advisory Panel members by the author. Electronic or hard copies can be sent to members on request. The table of contents is available online (<http://www.rawmeatybones.com/rmbbook/RMB-contents.pdf>).

Home Prepared Diets and Companion Animals

“Today, more than ever, with the growing use of the World Wide Web, veterinary health professionals are finding themselves dealing with a clientele that, for better or worse, has access to a large body of information on small animal nutrition and medicine. (...) Today’s veterinary health professionals are faced with the challenge of not only staying current with emerging research on clinical nutrition, including fads and popular trends, but of being able to understand why pet owners choose certain feeding practices and how to use effective strategies to influence them to change when it is in their pet’s best interest to do so” (Michel, 2006)

1. Background

The intricate equilibrium of chemicals that is at the basis of all animal living processes has intrigued and awed scientists for centuries. If at first disease was mostly associated with bacterial infection, the medical profession quickly realised that the deficiency and excess of certain nutrients could also have a relevant impact in the homeostatic equilibrium.

Since then, improvements in molecular techniques have further elucidated the genetic component of nutritional disease and, consequently, recent years have witnessed an increasing awareness of the role of nutrition in health and wellbeing.

Interest in companion animal nutrition has accompanied the attention to human diet and, as a result, animal owners today have high expectations of the veterinary profession regarding the provision of advice and information on how - and what - to feed their pets.^[1]

The widespread feeding of commercially prepared foods is a fairly recent practise, found only in developed countries^[2], and was established as a tentative response to a growing demand for high quality and nutritionally balanced meals for companion animals. In the EU, 196 million pets are presently being catered for by 650 companies, which generate a turnover of £20.5bn and create 50,000 direct jobs. The industry is also responsible for the purchase 2.75 million tonnes of agricultural by-products^a thus adding value to material that would otherwise have to be disposed of.^[3]

Even so, a counter-trend is already emerging that favours home-prepared meals for pets, perceived by some owners to be a more ‘natural’ and ‘wholesome’ alternative to commercial foods. Based on the fact that today’s companion animals have evolved from wild non-domesticated ancestry, some are also of the belief that the feeding of raw, meat-based diets will be particularly adjusted to their pets. Public health officials, veterinary surgeons and scientific research mostly disagree with these points and thus a passionate debate has been played out in the media over recent years.

Whilst it is important that owners understand the scientific reasoning behind this disagreement, it also seems clear that veterinary surgeons can play a more supportive role in empowering their clients to take ownership of their pet’s nutrition.^[1]

“Unlike veterinarians and researchers, most pet owners approach feeding their pets much like they approach feeding their families.”^[4] As such, many are uncomfortable with the fact that commercial foods often include by-products of the human food industry - because they wouldn’t chose to eat these foods themselves they question feeding them to their pets.

Other emotional factors can also come into play and should not be dismissed or ignored. For example, the social significance that human beings inherently place in food can drive certain owners to seek a closer bond with their companions by exerting control and influence over what they eat – as they would do to family and friends.

^a 500,000 tonnes of which sourced in the UK

These emotional considerations can be further fuelled by media reports that certain additives and preservatives in commercially prepared foods might have a detrimental effect to the health and behaviour of their animals. Even if most of these reports are discredited by the scientific community and are often based on anecdotal evidence, they are sufficient to make some clients vehemently question the confidence that most veterinary surgeons place on commercially prepared foods.

2. Home Prepared Diets

Veterinary surgeons tend to recommend home prepared meals whenever a commercial product for a particular medical condition is not available in the market,^[1] and when food elimination trials are necessary. Other than that, the tendency is to follow scientific literature, the majority of which is favourable towards the use of commercial pet food.

Several factors can cause a vet to refrain from recommending home preparation of pet foods. Firstly, it requires a “greater investment of time, and likely of money, than feeding a commercially prepared pet food”.^[2] Secondly, formulating a complete and balanced pet food requires specialised knowledge and therefore the potential to cause nutritional deficiencies, excesses or imbalances is very high.^[5]

The nutritional adequacy of a pet’s diet is evaluated by first determining the food’s composition through a physico-chemical analysis of the food^b. The amounts of each of the nutrients are then cross-checked against tables of recommended nutrient quantities produced by competent authorities, based on scientific evidence^[6]. Some of the parameters analysed are described in Table 1, along with the risks incurred by someone devising a home prepared diet without access to specialist advice and the diseases that are commonly associated to a deficiency, excess or imbalance of that particular nutrient. As the table shows, unsuitable diets can easily be provided even by well-meaning owners if they are not properly informed. Unfortunately, this can result in severe physiologic problems for the animals.

Wagner and co-workers^[7] have compared the nutritional adequacy of home prepared diets and commercial diets in a population of 79 dogs. It was found that when analysed against published nutritional recommended values,^[8] home prepared diets showed deficiency of fat soluble vitamins (Vitamin A and E), some microminerals (potassium, copper and zinc) and macrominerals (calcium, phosphorus). On the other hand, average diet protein concentration was significantly higher in home prepared diets than in commercial alternatives.

Smith *et al.*^[9] have later analysed 85 published home-cooked diets for dogs and cats and found that a large majority were inadequate in various minerals (86%), proteins (56%- mostly taurine deficiency found) and vitamins (62%%- mostly choline deficiency found).

Both these studies were preceded by an investigation on the nutritional adequacy of home-made hypoallergenic diets recommended by 116 north American vets.^[10] The research found that 90% of the homemade elimination diets were not nutritionally adequate for adult maintenance. Again, the home-made rations were “much higher in protein and much lower in calcium, thiamine and iron.” Levels of taurine for feline patients were also considered insufficient. It is likely that these results have played a part in the current tendency for veterinarians to recommend commercial diets over home prepared ones.

It should be stressed, however, that the literature also makes mention of complete and balanced homemade diet recipes which include sources of calcium and other essential vitamins.^[9-10] The management of dermatoses^[11] and gastrointestinal diseases,^[12] for example, has been successfully achieved with home prepared rations.

^b Six fractions are separated from it: moisture, ash, crude protein, crude fibre, ether extract and nitrogen free extract.

The scientific literature is unanimous in stating that recipes that are strictly followed, according to appropriate cooking protocols, and using the correct ingredients in the correct amounts can surely provide a nutritionally balanced diet to a companion animal. However, it should be noted that nutrients can vary significantly based on ingredient selection (i.e. size of eggs, fat percentage in meat sources, taurine content in liver etc)^[9, 13] and even if owners do not engage in gradually substituting ingredients and procedures in the recipes, a variability is already inherent in the process. The cooking process can also vary the amount of nutrients available in the diet.^[13]

The tendency for owners to “adapt” and substitute ingredients in veterinary-recommended recipes is well known.^[1-2] Owners may extend human nutrition concepts to their pet’s diet (such as opting for a variety foods and avoiding fat, sugar, cholesterol and sodium), unaware that these nutritional guidelines are rarely appropriate for pets.^[1] On the other hand, there is also the risk that owners change the nutritional balance of the recipes, by making ingredient substitutions based on product availability, affordability, or personal taste, which may not be appropriate for the animal in question. These issues are important for all animals but are of particular concern for those who have more stringent dietary requirements: cats in general, as well as growing, gestating and lactating animals.^[2]

It is now firmly established that nutritional imbalances lead to pathological changes in animals, and for that reason owners that prefer feeding their pets home prepared foods need to be sufficiently supported by their clinician. Examples of established diseases derived from nutrient insufficiency can easily be found: dilated cardiomyopathy in cats with taurine deficiency,^[14] rickets in dogs with calcium phosphorus and vitamin D imbalances,^[15] skin disorders such as excessive scale, erythema, alopecia, poor hair growth or pruritus,^[16] among others.

3. Commercial Foods: common criticisms

3.1 Additives

Additives in commercial pet foods are a common source of concern by animal owners. In the EU, the pet food industry complies with Regulation EU Nr 1831/2003, which is reviewed and updated periodically in the “Register of Feed Additives (www.europa.eu). Additionally, in the U.K., all members of the Pet Food Manufacturers Association (PFMA) (which accounts for 90% of the national pet food market^[17]) are bound to obey the Feeding Stuffs Regulations 2010^c.

Food additives are introduced into foods to enhance flavour, texture, stability or to counteract the unattractive coloration that sometimes results from cooking procedures. Additives frequently incriminated in human adverse reactions include sulfites, monosodium glutamate, tartrazine and other azo- and non-azo dyes, benzoates, parabens and spices.^[2] Their effects are most adequately described as food intolerances than food allergies, as little immunological response is believed to be involved.^[10, 18]

Despite the belief that food additives cause health problems in dogs and cats, no peer-reviewed study has yet supported this link, and studies to “document the true incidence and the mechanisms of food intolerance due to additives used in pet foods [are needed]”.^[10, 18] All the additives which have been deemed to be prejudicial to animal health like propylene glycol and disulfides (found in onions, for example) have already been eliminated from canine and feline commercial foods.^[19]

The need for antioxidants in pet foods relates to the stability of the product. It is possible to opt for naturally occurring antioxidants (such as tocopherols or ascorbic acid) but since these tend to be less effective than its synthetic counterparts, the “best used by” dates should be closely followed. Preservatives such as ethoxyquin (an artificial antioxidant), which are often considered by the public to be hazardous to animal health, have been extensively tested and proven to be safe for consumption.^[2]

^c <http://www.legislation.gov.uk/uksi/2010/2503/body/made>

Certain campaigners also refer to links between dog behaviour and the presence of certain additives in food. Behaviour is regulated by neurotransmitters and hormones, which in turn are affected by the availability of their precursors (such as tryptophan, tyrosine, etc) in the body. The hypothesis that diet can potentially influence certain behavioural responses from animals is therefore theoretically possible.

A review has been published focusing on the impact of nutrition on canine behaviour.^[20] Some evidence was found to support the link between animal behaviour and nutrition, but there was a recognised lack of research in the field. Specifically, the effect of commercial and home-prepared diets in canine behaviour has not been broached, to the best of our knowledge, in any peer-reviewed published study. Claims that food additives cause behaviour issues in dogs are therefore based on personal experience and anecdotal evidence.

Sodium benzoate, tartrazine and azo-dyes are frequently mentioned as dangerous additives because of their links to hyperactivity in children.^[21] The researchers responsible for the study that made this link, however, clarify that only modest increase in activity levels was seen in children exposed to diets containing these additives and that no claim is made in the study that such substances cause clinically defined ADHD.^[22] Similar doubled-blinded studies have not been performed with animals.

Regardless of the lack of evidence relating pet food composition and poor animal health, suspicions regarding the use of additives and preservatives, in combination with publicized incidents that caused the recall of certain pet food products, have contributed to a growing market of “natural” food alternatives. Whilst the term “organic” is synonymous of a product that meets certain government standards, it should be noted that terms like “premium”, “holistic” and “human grade” have no legal protected definition and are therefore freely interpreted by manufacturers.

3.2 Raw Food Diets

Raw food diets have gained popularity in recent years.^[23] Studies have found that “although there is a lack of large cohort studies to evaluate risk or benefit of raw meat diets fed to pets, there is enough evidence to compel veterinarians to discuss human health implications of these diets with owners”, (namely the risks associated with *Salmonella* infection). Raw foods have been found to be a “substantial risk of infectious disease to the pet, the pet’s environment and the humans in the household”.^[4] Proponents of this diet attach its value to a perceived benefit coming from the presence of enzymes in raw foods, which are depleted upon heating. However, the studies often quoted by campaigners to support this benefit,^[24] propose instead that “there is no direct evidence that lack of enzyme synergy leads to any disease processes” and that “the role of enzyme synergy has not been studied enough to prove its significance.”^[4]

The feeding of raw body parts of animals to cats and dogs can also bring about the emergence of certain dietary induced diseases. A study recently published has found that hyperthyroidism can be seen in dogs on a raw meat diet or fed fresh or dried gullets, as a direct consequence of their diet.^[25] This condition disappeared when the animals were fed commercial dog food or pure muscle meat, implying that the most likely cause for the condition was “due to feeding thyroid tissue from animal origin”.

4. Conclusions

Animal Nutrition is an integral part of undergraduate curricula in all UK Veterinary Medicine degrees and the “correct assessment of the nutritional status of an animal” as well as the ability “to advise a client on principles of husbandry and feeding” are considered day one practical competencies for all new veterinary graduates. Nonetheless, this applies only to “commonly presented cases” and

does not include “advanced nutritional advice for complex cases”. At present, the European College of Veterinary Comparative Nutrition recognises a total of 37 specialists in the area, three of which reside in the U.K.^d Two additional U.K.-based specialists possess a Diploma from the American College of Veterinary Nutrition. According to expert opinion,^[2] the market for this speciality is increasing exponentially and it will be interesting to monitor the number of veterinary nutrition specialists in the future.

It is now accepted that the pathophysiological processes of certain diseases can be modulated by means of clinical nutrition.^[26] This illustrates the role of food in not only preventing disease, but also on curing chronic conditions when they occur.

A recent review has looked at the role of nutrients in modulating disease with particular emphasis on veterinary patients and has found that, whilst the prospect of nutritional modulation of disease is frankly promising, there is a general “paucity of data in veterinary patients”.^[26] This however, coincides with the emergence of more nutritionally aware animal owners, who desire to understand of the role of nutrition in the health of their pets and as such are seeking more information and advice. Addressing clients concerns without seeking information about their attitudes and beliefs regarding diets for her/his pet will fail to address concerns and risks being too reductive, because food is enveloped in profound social, cultural and religious significance.^[2]

The unique role that veterinary practitioners play as promoters of animal health and welfare is of paramount importance in protecting animals from dietary fads that might harm them. Veterinary surgeons play a critical role in pet food safety by identifying and diagnosing food-related illness,^[27] but also by assisting owners who wish to play a more direct part on the feeding of their pets.

Additionally, veterinary surgeons are also expected to play the role of reassuring the public on the safety of commercial pet foods. Tools such as PetFAST^e – an online system that allows tracking health problems in dogs and cats suspected to be pet food related – is now helping veterinary surgeons in Australia to provide such reassurance, as well as help validate the adequacy of certain diets. As the profession increasingly moves towards a more evidence-based core, it is likely that such initiatives will be spread elsewhere.

More information:

- EU Animal Nutrition Legislation
http://europa.eu/legislation_summaries/food_safety/animal_nutrition/index_en.htm
- European College of Veterinary & Comparative Nutrition
<http://www.esvcn.com>

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^d Specialism fully recognised in 2009

^e PetFAST : Pet Food Adverse Event System of Tracking (<http://www.ava.com.au/petfast>)

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RCVS POSITION

December 2004

EARLY DAY MOTION – PROCESSED PET FOODS AND VETS

The RCVS is aware of different views within the veterinary profession concerning the feeding of processed pet foods to companion animals, not least those of Tom Lonsdale. However, as the regulatory body for the veterinary profession, the RCVS does not exist to represent the views of veterinary surgeons and is not in a position to provide authoritative scientific comment on the nutritional benefits of pet foods.

Veterinary surgeons are not expected to endorse products without due justification or if they might compromise the clinical care of animals. The RCVS does, however, expect veterinary surgeons to make clinical decisions according to their professional judgement and based on the best available evidence at the time.

We understand that there is currently an abundance of scientific evidence available to support the use of processed pet foods for everyday feeding of companion animals, together with medicated or "science" diets to provide advanced nutrition for animals that may be unwell, nutritionally deficient or at a certain stage in life.

Mr Lonsdale has stood in the RCVS Council Elections for the past eight years in order to promote his concerns. Each time he has secured the least number of votes, which would imply there is little support for his views within the veterinary profession, of whom there are currently over 21,000 registered RCVS members.

We have discussed Mr Lonsdale's concerns with him on a number of occasions and have urged him to submit scientific evidence to support his claims and to publish this material in peer-reviewed (veterinary) scientific journals. We understand that Mr Lonsdale has not yet accomplished this but we would encourage him to do so.

ENDS

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RCVS POSITION

February 2006

EARLY DAY MOTION 1003 – RAW MEATY BONES GROUP

The above EDM was laid down in November 2005 by Mr David Lepper MP and was similar to that laid down by Mr David Taylor MP in December 2004. There is little for us to add to our position taken in December last year but we hope that the following comments might serve as a useful reminder and to aid any further debate.

As the regulatory body for the veterinary profession, the RCVS does not exist to represent the views of veterinary surgeons and is not in a position to commission authoritative scientific research on the nutritional benefits of pet foods. Neither do we have the power to conduct an independent inquiry into the role of pet food manufacturers or the veterinary profession's role in recommending processed pet foods to their clients.

However, our regulatory powers, under the Veterinary Surgeons Act 1966, do enable us to investigate complaints submitted against anyone on the *RCVS Register*. To protect the public interest we are the interface between complainants and respondent veterinary surgeons, combining legal and veterinary expertise, monitored by lay observers, to ensure correct process, scientific accuracy and fairness.

Through our own literature searches, and those of others, we understand that scientific evidence is publicly available to support the use of processed pet foods. These may be 'lifestyle' foods for healthy animals or 'prescription' diets for those that are unwell – for example, low protein/low phosphorous diets for animals with renal disease. We expect veterinary surgeons to make clinical decisions according to their professional judgement and based on the best available evidence at the time – veterinary surgeons are not expected to recommend products without due justification.

Many veterinary practices provide a range of services to their clients, in response to demand, which often includes the sale of pet foods. However, animal owners always have a choice in terms of which pet foods they buy and from where, or they can, of course, elect to use home-prepared foods (although some published work suggests there may be public health risks inherent in this practice).

We would continue to encourage Mr Tom Lonsdale to seek scientific review of his first book *Raw Meaty Bones* and his more recent book *Work Wonders*. Similarly, as Mr Lonsdale's assertions and those of his support group UK Raw Meaty Bones (UKRMB) remain largely anecdotal as to the superiority of natural food, we would, again, encourage them to provide sound statistical and scientific evidence to support their claims.

ENDS

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ETHICS AND WELFARE GROUP 11 MAY 2011

NUTRITION – LITERATURE REVIEW ON RAW MEAT AND BONES (RMB) DIET

BACKGROUND

1. It was agreed at the February meeting of EWG that a BVA position on diet and nutrition would be put on hold until EWG had considered a review of the literature available on RMB. A preliminary report, “Is a raw meat and bones diet a balanced food intake?” is at **Annex A**.

PRELIMINARY REPORT- KEY POINTS

2. The report noted:
 - i. a severe lack of concrete evidence for the benefit or detriment of feeding a raw meat diet as against a commercial tinned or dry diet
 - i. although work had been done on links between consumption of commercial cat foods and, for example, renal failure these were not controlled chemical trials
 - ii. work done with dogs to assess digestibility of raw and rendered animal by-products had been hampered by fluctuation of digestibility of these
 - iii. that commercial diets appeared no more likely to lead to obesity than homemade diets
 - ii. that although there could be a significant public health risk through feeding animals with RMB diets where the raw food had been contaminated with pathogens such as salmonella this was difficult to quantify. A US study had also identified a dried commercial dog food as a source of salmonella in a sizeable outbreak in people in the US in 2006/07
 - iii. some interesting early results from an examination of feeding patterns of foxhounds in two hunt kennels being examined to provide evidence for the potential benefits of a RMB diet. This was not a controlled study but preliminary evaluation showed better dental health in the kennel where the hounds had access to bones as well as raw meat
3. The report concluded that there was much work still to be undertaken to evaluate the risks from a RMB diet but this preliminary literature review and the evaluation of hounds in two hunt kennels showed potential benefits.

BVA POSITION

4. When a BVA position on nutrition was first discussed in February 2010 it was agreed that this, rather than a position on RMB per se, was what was required. It was also agreed at that meeting that
 - i. all pets should be fed a nutritionally balanced diet

- ii. it may be more convenient for owners to feed their pets pre-prepared animal feed mixes but other diets were acceptable as long as they contained all the necessary nutrients required by the animal
 - iii. if an owner is unsure they should consult their veterinary surgeon
5. BVA's position on nutrition is on hold pending the production of the full literature review, however, our website information on obesity http://www.bva.co.uk/activity_and_advice/1746.aspx states that "BVA believes that veterinary surgeons are in an ideal position to educate pet owners on the correct weight and diet for their pet.
6. BVA has also produced a Policy Brief (NOTE: the purpose of a policy brief is to provide background information for members of BVA) entitled "Raw Meaty Bones Lobby". This document was produced in 2006 in consultation with the Pet Food Manufacturers Association (PFMA) and references their document on RMB. It is no longer listed as one of BVA's Current Issues on the website but is accessible through the list of Past Issues. It is at **ANNEX B**
7. On the PFMA website in their statement on RMB <http://www.pfma.org.uk/assets/images/general/file/Raw%20Meaty%20Bones%20Diets%20190509.pdf> the following points are noted:

".....concern particularly amongst vets and animal nutritionists that this exclusive diet may not meet the pets needs without appropriate supplementation. This is particularly the case for young and growing pets whose nutritional requirements are far more demanding to ensure optimal growth"

"There is a wealth of research available to support the feeding of commercially prepared pet food"

EWG ACTION

8. **EWG is invited to advise whether BVA should:**
- i. **ask James Stewart and David Williams to continue working to produce a final report on the RMB diet**
 - ii. **take no action pending the production of the final report by David Williams and James Stewart,**
 - iii. **Produce a holding statement on pet nutrition including reference (either direct or indirect) to the RMB issue and the report that is in development**

BVA Policy Brief

Raw Meaty Bones Lobby

An ongoing debate within the veterinary profession. A small lobby group proposes that pet dogs and cats should be fed a 'natural diet' of raw meat and bones rather than commercially prepared diets. The group is active in their criticism of the commercial manufacturers of pet foods. This criticism has recently been extended to the university veterinary schools, which have been accused of teaching undergraduate veterinary nutrition in a biased fashion in return for financial support for research and clinical work within the schools.

Key facts:

- Dogs are omnivorous animals whilst cats are obligate carnivores. Both species require a balance of essential dietary nutrients (e.g. vitamins, minerals and essential fatty acids) for optimal health and longevity.
- Commercially prepared pet foods have been scientifically formulated to contain the optimum balance of essential dietary nutrients for each species. Some commercial pet foods have been designed to satisfy the requirements of certain types of dog or their different activities or the specialised dietary needs of animals with a range of illnesses. The use of such diets over the past decades likely accounts for the increased health and longevity of companion animals.
- These commercial diets are based on extensive research, performed both 'in-house' and in collaboration with veterinary schools. Much of this research is published in the peer-reviewed scientific literature. By contrast, there is no scientific evidence base to support the benefits of just feeding raw meat and bones.
- Dogs and cats may be fed with home-prepared 'natural diets', but it is very important to achieve the optimum balance of requisite nutrients in this fashion.
- The feeding of raw meat and bones, especially small cooked sharp or splintered bones, to companion animals carries particular risks. This includes infection with pathogenic bacteria associated with uncooked meats (e.g. Salmonella, Campylobacter) and injury (e.g. intestinal perforation) caused by bone fragments. The BSAVA (the BVA's relevant specialist division) advises against the feeding of raw meat or bones to companion animals for this reason.
- The RMB lobby proposes that the feeding of bones is beneficial to oral health (teeth and gums). Although providing large raw marrow bones may be beneficial as something to chew, similar benefits may be achieved by feeding of purpose designed kibble food or dental chews, without the attendant risk of damage (e.g. fractures) of the teeth.

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Additional Resources

- Pet Food Manufacturers Association Information Paper on Raw Meat and Bones Discussions. PFMA, January 2005.

27 October 2005

Rebuttal of British Veterinary Association Policy Brief

When vets unwittingly, accidentally injure the patients under their care it's regrettable but, because vets are human, it's mostly forgivable. When vets conspire with the manufacturers of junk food to promote the mass consumption of products known to maim and kill a majority of the world's pets then forgiveness is no longer an option.

The organisations:

The British Veterinary Association (BVA) is the main UK veterinary association with over 10,000 members

<http://www.bva.co.uk/>

The British Small Animal Veterinary Association (BSAVA) claims to 'foster high scientific and educational standards of small animal medicine and surgery in practice, teaching and research.' and represents over 5,500 members <http://www.bsava.com/>

The Pet Food Manufacturers' Association (PFMA) represents 50 small, medium and giant junk pet-food companies doing business in the UK:

<http://www.pfma.com/public/welcome.htm>

BVA Policy Brief

Raw Meaty Bones Lobby

An ongoing debate within the veterinary profession.

False: Apathy rules within the veterinary profession and the veterinary authorities censor and suppress attempts to raise awareness of the junk pet-food scam.

A small lobby group proposes that pet dogs and cats should be fed a 'natural diet' of raw meat and bones rather than commercially prepared diets. The

group is active in their criticism of the commercial manufacturers of pet foods.

True: The UKRMB Support and Action Group

www.ukrmb.co.uk promotes the feeding of a diet based on whole carcasses or raw, meaty bones and a few table scraps. UKRMB accuses the junk pet-food industry of producing products that injure the health of a majority of the world's pets.

This criticism has recently been extended to the university veterinary schools, which have been accused of teaching undergraduate veterinary nutrition in a biased fashion in return for financial support for research and clinical work within the schools.

True: It's a £multi-million scandal. The vet schools are propped up by junk pet-food company funds; they grovel to the companies; teach from company produced text books and consciously, deliberately exclude the provision of natural dietary information. Young vets emerge from the vet schools brimful of counterfeit science, clueless about natural feeding but well versed in junk pet-food company factoids and falsehoods.

Key facts: *Pet food industry inspired factoids and falsehoods*

- Dogs are omnivorous animals

False: Dogs are carnivores like their wolf ancestors.

whilst cats are obligate carnivores.

True: That's why cats catch birds and small mammals — unless forced to consume cooked, pulverized grain.

Both species require a balance of essential dietary nutrients (e.g. vitamins, minerals and essential fatty acids) for optimal health and longevity.

Pseudoscientific gobbledygook: Air, water and food are all *essential* and well defined and provided for by nature.

- Commercially prepared pet foods have been scientifically formulated to contain the optimum balance of essential dietary nutrients for each species.

False: Companies formulate their products to maximize profits and to minimize or disguise the adverse health consequences. Nature determines the optimum balance of essential nutrients.

Some commercial pet foods have been designed to satisfy the requirements of specific breeds or the specialised dietary needs of animals with a range of illnesses.

Marketing scam: Should be investigated.

The use of such diets over the past decades likely accounts for the increased health and longevity of companion animals.

False and absurd. No evidence that there is increased longevity (save for the control of infectious diseases). Junk food known to impair health and shorten life.

- These commercial diets are based on extensive research, performed both ‘in-house’ and in collaboration with veterinary schools.

True: Veterinary profession little more than R&D and marketing arm of the junk pet-food industry.

Much of this research is published in the peer-reviewed scientific literature.

Disinformation: The ‘scientific’ journals are crammed with biased research endorsed by the anonymous peer-review process that the Editor of the *Lancet*, Richard Horton, labeled: ‘Biased, unjust, unaccountable, incomplete, easily fixed, often insulting, usually ignorant, occasionally foolish and frequently wrong.’

Journal peer reviewers don’t sign their reviews; they operate in secrecy, and the so called scientists, whose papers are reviewed, mostly come from the same pool of pet-food company servants.

By contrast, there is no scientific evidence base to support the benefits of feeding raw meat and bones.

False: The medical, dental and veterinary literature is replete with hard scientific evidence. Common sense and common experience confirm that Nature got it right. *Raw Meaty Bones: Promote Health* comprises 389 pages of referenced evidence, fully endorsed by five veterinary peer-reviewers who signed their reviews.

- Dogs and cats may be fed with home-prepared ‘natural diets’, but it is difficult to achieve the optimum balance of requisite nutrients in this fashion.

Egregious nonsense: Dogs and cats have been fed by humans for thousands of years. The junk pet-food industry is less than 150 years old.

- The feeding of raw meat and bones to companion animals carries particular risks, including infection with pathogenic bacteria associated with uncooked meats (e.g. Salmonella, Campylobacter) and injury (e.g. intestinal perforation) caused by bone fragments.

Scaremongering disinformation: Negligible risks compared with the widespread ill health and injury associated with junk foods. (See *Raw Meaty Bones*)

The BSAVA (the BVA’s relevant specialist division) advises against the feeding of raw meat or bones to companion animals for this reason.

Disgraceful: The BSAVA should be investigated.

- The RMB lobby proposes that the feeding of bones is beneficial to oral health (teeth and gums).

True: Raw meaty bones are essential for oral health and to ward off many fatal diseases.

Similar benefits may be achieved by feeding of purpose designed kibble food or dental chews, without the attendant risk of damage (e.g. fractures) of the teeth.

False: Reckless scaremongering and commercially inspired disinformation.

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Disgraceful: The BVA, BSAVA and PFMA should be investigated by several arms of government.

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Disgraceful: Why are the BVA, BSAVA and PFMA so desperate to present their disinformation day and night? Who pays for this outrage?

Additional Resources

- Pet Food Manufacturers Association Information Paper on Raw Meat and Bones Discussions. PFMA, January 2005.

Disgraceful: The PFMA calls the tune; the BVA and BSAVA march in step singing in harmony.

What about the animals? When will this cruel alliance be made accountable?