

# PETFOOD NEWS

March 2022



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### CVM Updates

#### **FDA Makes Low-Risk Determination for Marketing of Products from Genome-Edited Beef Cattle After Safety Review**

##### **Decision Regarding Slick-Haired Cattle is Agency's First Enforcement Discretion Decision for an Intentional Genomic Alteration in an Animal for Food Use**

The U.S. Food and Drug Administration announced it has made a low-risk determination for the marketing of products, including food, from two genome-edited beef cattle and their offspring after determining that the intentional genomic alteration (IGA) does not raise any safety concerns (low-risk determination). The IGA results in the equivalent genotype (genetic make-up) and short-hair coat trait seen in some conventionally bred cattle, known as a "slick" coat. This is the FDA's first low-risk determination for enforcement discretion for an IGA in an animal for food use.

"Today's decision underscores our commitment to using a risk and science-based, data-driven process that focuses on safety to the animals containing intentional genomic alterations and safety to the people who eat the food produced by these animals," said Steven M. Solomon, D.V.M.,

M.P.H., director of the FDA's Center for Veterinary Medicine. "It also demonstrates our ability to identify low-risk IGAs that don't raise concerns about safety, when used for food production. We expect that our decision will encourage other developers to bring animal biotechnology products forward for the FDA's risk determination in this rapidly developing field, paving the way for animals containing low-risk IGAs to more efficiently reach the marketplace."

Based on the agency's review of scientific data, the FDA has determined that the product is low-risk and does not raise any safety concerns, and the FDA does not expect the product developer of the IGA to pursue the FDA's approval prior to marketing (enforcement discretion). To date, the FDA has made low-risk determinations for enforcement discretion for many other IGAs in animals for non-food uses and also has approved applications for five IGAs: in groups of goat [External Link Disclaimer](#), chicken [External Link Disclaimer](#), salmon [External Link Disclaimer](#), rabbit and, most recently, in a line of pigs.

IGAs are alterations made using molecular technologies that introduce changes to the genome of an animal. The IGA in these cattle, known as PRLR-SLICK cattle, was introduced using a genome-editing technique known as CRISPR. The IGA can be passed on to offspring, allowing the trait to be shared through conventional breeding. There are conventionally bred cattle with naturally-occurring mutations that result in the same extremely short,

slick-hair coat. Reports in scientific literature indicate that cattle with this extremely short, slick-hair coat are potentially able to better withstand hot weather. Cattle that are comfortable in their environment are less likely to experience temperature-related stress and may result in improved food production. Although PRLR-SLICK cattle have an equivalent trait to those cattle with a naturally-occurring short hair coat, they are not currently in commerce. The product developer plans to use the genetic products from these two animals with select customers in the global market soon and anticipates meat products will be available for purchase by general consumers as early as two years.

The FDA reviewed genomic data and other information submitted by the product developer confirming that the IGA in genome-edited PRLR-SLICK cattle is equivalent to naturally occurring mutations that have arisen in several breeds of cattle as an adaptation to being raised in tropical or subtropical environments. The data also confirmed that the IGA results in the same slick-hair trait as in cattle found in conventional agriculture. Further, the food from the cattle is the same as food from conventionally bred cattle that have the same slick-hair trait.

The FDA does not expect farms or facilities not owned or operated by the developer that are producing and breeding these low-risk PRLR-SLICK cattle using conventional breeding techniques to register with the agency. The low-risk determination was provided to Acceligen.

### **FDA Issues Guidance on Enforcement Discretion Policies for Certain FSMA Regulations**

the U.S. Food and Drug Administration (FDA) issued guidance on its intent not to enforce certain provisions of five rules that implement the FDA Food Safety Modernization Act (FSMA). As we began implementation of these rules, the FDA received questions and comments from stakeholders regarding specific provisions. In certain situations, the FDA has determined it is appropriate to take time to consider options, including rulemaking, to address concerns raised by stakeholders, while continuing to protect public health. As we work on solutions, the agency does not intend to enforce these provisions as they currently apply to entities or activities addressed in the guidance.

The enforcement discretion policies announced today are specific to provisions in the following rules:

- Current Good Manufacturing Practice and Hazard Analysis and Risk-Based Preventive Controls for Human Food,
- Current Good Manufacturing Practice and Hazard Analysis and Risk-Based Preventive Controls for Animal Food,
- Foreign Supplier Verification Program (FSVP),
- Produce Safety (PSR), and

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- Intentional Adulteration (IA).

In many instances, this guidance builds upon previously announced enforcement policies.

### **Extension of Enforcement Discretion Policy for Supply-Chain Program Requirements Applicable to Contract Manufacturers of Human and Animal Food**

On November 6, 2019, the agency announced it would continue an enforcement discretion policy described in a November 2017 guidance for certain FSMA supply-chain program requirements applicable to receiving facilities that are contract manufacturers of human and animal foods, while the agency considered issues relating to supplier verification and approval challenges. This guidance formally extends the enforcement discretion policy. While the FDA considers these issues it does not intend to enforce certain supply-chain program requirements for food manufactured for the brand owner by a contract manufacturer/processor.

### **Enforcement Policy for Certain Entities and Requirements under the Intentional Adulteration Rule**

Enforcement Discretion for facilities that conduct farm-related activities

In a January 2018 FSMA guidance, the FDA established an enforcement discretion policy for certain facilities that conduct certain farm-related activities but are not considered farms under the “farm” definition. In this

new guidance, the FDA is clarifying that it does not intend to take enforcement action related to the IA rule as it applies to the same facilities and activities, while the agency issues rulemaking that could change the definition of “farm”. Such a change would impact whether the IA provisions apply to these entities.

Enforcement Discretion for the reanalysis provisions in the IA rule in certain circumstances

The IA rule requires reanalysis of a Food Defense Plan (FDP) in certain circumstances, including whenever a mitigation strategy, a combination of strategies, or the FDP as a whole is not properly implemented. The rule also requires that covered entities establish and implement food defense corrective actions procedures that must be taken if mitigation strategies are not properly implemented. To reduce duplication, the FDA plans to exercise enforcement discretion for the requirement for reanalysis when improper implementation of mitigation strategies is addressed through actions that correct the deficiency and reduce the likelihood that the deficiency will happen again.

Enforcement Policy for Supplier Approval and Verification Requirements in the PC Human, PC Animal and FSVP Regulations

This guidance establishes an enforcement discretion policy for a receiving facility or FSVP importer when they are verifying their supplier’s compliance with PC Human Food, PC Animal Food, or Produce Safety requirements

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covered by an enforcement discretion policy. The FDA will not expect a receiving facility or FSVP importer to verify its supplier's compliance with requirements that are subject to enforcement discretion for the supplier (e.g., Produce Safety rule requirements for wine grapes, hops, pulse crops, and almonds that are the subject of enforcement discretion for farms that grow and harvest those crops). Receiving facilities and FSVP importers are still expected to conduct other required supplier verification activities.

## Industry News

### What's coming in 2022 from AAFCO's Pet Food Committee?

The Association of American Feed Control Officials (AAFCO) 2022 Midyear Meeting in January touched on many important topics that affect pet food manufacturers and agricultural science professionals. Specifically, AAFCO's Pet Food Committee (PFC) discussed priorities and a timeline for issues that will be researched in 2022 for possible modifications and improvements down the road.

The following is an update on the matters that pertain to industry safety and to changes that are directed toward consumers.

### **Pet Food Labeling Modernization (PFLM)**

In response to consumer requests, work and research continue to clarify the need and design for a new pet food nutrition label that looks more like the human food labels. With a focus on changes to labeling with respect to nutritional adequacy, safe handling of pet foods, the ingredient list and feeding directions, the PFC is responding to comments and gathering additional responses to determine 1) adequacy using a graphic vs. a statement to identify the type of product, and 2) nutrition box content and design. With so many shifts, it is important for consumers to clearly understand labels — and to understand why these labels are changing.

One-on-one interviews with consumers are taking place this month (March 2022), followed by discussions with regulators. A comprehensive review process will assess the collective feedback which will clarify next steps. In May 2022, the PFC will share the findings and request additional comments from the industry.

Then at the AAFCO Annual Meeting in August 2022, PFC will share an update with feedback and have members vote on any changes. A final decision will be made at this time, and a plan and tentative timeline will be shared so manufacturers have ample time to transition their labels.

To learn more about PFLM and next steps, a free webinar series will take place later this spring. Registration will be available at [aafco.org](http://aafco.org) and open to interested participants.

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Changes and updates will also be included on the AAFCO Talks Pet Food website, an excellent resource for all communication. In fact, AAFCO Talks is being revamped, and website visitors will soon notice that it's even more user friendly with timely information.

### **Copper levels**

AAFCO has formed a work group — including manufacturers, regulators, veterinarians and other industry members — to explore the maximum copper levels in dog food. The group determined that ongoing research is still needed before a recommendation can be made on whether revised copper levels need to be considered.

### **Briefly: Top 5 takeaways**

1 In response to consumer requests, work and research continue to clarify the need and design for a new pet food nutrition label that looks more like the human-food labels.

2 At the 2022 AAFCO Annual Meeting, the Pet Food Committee will share an update on the pet food labeling modernization work with feedback and have members vote on any changes. A final decision will be made at this time.

3 AAFCO has formed a work group — including manufacturers, regulators, veterinarians and other industry members — to explore the maximum copper levels in dog food.

4 AAFCO and the Pet Food Committee are finetuning the language of “human-grade” pet food for consistency with the U.S. FDA.

5 The Committee recently voted to accept the revised Human Grade Guidelines and present the revised Guidelines to the AAFCO Board with a recommendation to accept.

### **INGREDIENT ISSUES: Natural and artificial flavors in dog and cat diets**

We have all come across the term “Natural and Artificial Flavors” on pet food products. Typically, the claim is found on the front of the package where it is intended to describe in bold terms the flavor that should be expected. This is especially true of treat and snack products ... Bacon Flavor, Cheese Flavor, Buttered Popcorn Flavor, even Roasted Chicken Flavor. But when one reviews the ingredient statement more closely, the bacon, cheese, buttered popcorn or roasted chicken are minor to negligible amounts.

This is not a ploy to deceive. Rather, the intent is to provide flavor as an enhancement of the base product. It is also a way to convey that the product does not contain a preponderance of a particular ingredient (e.g., butter), but it has the organoleptic sensation when ingested for the flavor

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of butter. A flavor that dogs absolutely love — without the calories.

This can be achieved at very low inclusion levels and not negatively affect the process, nutrient or physical characteristics of the product. This is in part due to the very concentrated and amplified flavor perception of these ingredients.



### Why use flavors at all?

The “Natural and Artificial Flavors” statement, besides being included on the front of the package with its romance language, is also found in the

ingredient statement. “Natural and Artificial Flavors” may not have a specific flavor designation with it. This may seem ambiguous and confusing, but the labeling rules allow for these low-inclusion flavor ingredients to be somewhat oblique to protect the “secret recipe” from being reverse engineered. This provides a competitive advantage to the manufacturer and protects their intellectual property, something akin to Colonel Sanders’ 7 herbs and spices. This protection can also be a challenge because it is difficult for the consumer to ascertain exactly which natural or artificial flavor might be used. This mystery breeds suspicion and distrust, especially for the artificial flavors.

So why would one use flavors, whether they be natural or artificial, in the first place? Several reasons — first, to provide an attractive taste to the food. That may be overly obvious. But some food ingredients are bland and need a boost — extra help to amplify the base flavor. Also, some require augmentation with flavor to help bring consistency between production lots due to seasonal, varietal or geographic differences in the flavors of the base ingredients. Not too surprising, flavor like nutrient composition can vary. These additives can help level the flavor — an important characteristic if one intends to sell a product that relies on seasonal ingredients year round.

Another reason is to complement or enhance the current flavor in a way that would be less than obvious; for example, coffee and milk to produce a latte. The combination takes on a flavor not reflective of either individually.

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Then, there are issues with aftertastes and off flavors that need to be neutralized or masked. This is when consumers get nervous about intent. But it is a real and necessary part of food processing technology. Overcoming a fishy, burnt or bitter flavor are real examples of when the food's integrity is not an issue, but flavor help is needed.

### Asian insect-based pet foods boosted by US, Europe trends

**Singaporean urban professionals may avoid eating crickets for the same reason New York yuppies eschew deep-fried chitlins. Insect-based pet foods found a different route to acceptance in Singapore.**

Insect-based pet foods may have followed a convoluted route to growth in Southeast Asia. European and United States marketers promote insects as safe food sources by citing traditional cultures' use of insects in their cuisines. Anecdotes about grilled grubs bought in Bangkok may help market insect-based ingredients to Western audiences.

However, upper-class Southeast Asian households tend to avoid insects on their plates, said Leo Wein, founder and CEO of Protenga, a black soldier fly producer and processor. For example, consumption of insects is not part of an urban, affluent lifestyle in Singapore. Southeast Asian pet owners wouldn't be influenced to accept insects in pet food by

references to rustic insect street foods.



By analogy, in the U.S., intestines are generally considered a low value food. While tripe forms a part of traditional food cultures, especially in the rural Southern U.S., most people avoid eating digestive organs. Many of these organs then become byproducts, which some pet owners have come to reject. Singaporean yuppies may avoid eating crickets for the same reason New York yuppies eschew deep-fried chitlins (Foodie hipsters in Brooklyn not included).

Local traditional use couldn't be used as a marketing tool for

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insect-based pet foods in Southeast Asia, Wein said. Instead, the promotion and development of insect-based pet foods in the U.S. and Europe became the reference for consumers in Asia. A major part of the cultural difference was also in the format the insects are presented in. While traditional human consumption often involved whole six-legged animals, Western-style entomophagy tends toward using processed ingredients made from insect proteins, oils and other constituents.

Protenga's black soldier fly larvae are processed into its flagship products Hermet Protein, Hermet Oil, Hermet Frass and the YumGrubs pet food line. Protenga recently raised US\$2 million in venture funding. In 2020, Protenga raised funds to build three facilities. Production reacted installed capacity in 2021. The recent investment will fuel the launch of YumGrubs. The funding will also help build a second facility focused on insect protein raw material production.

Protenga will release one YumGrubs premium wet dog food product this year. Wet dog food allows the black soldier fly larvae's nutritional quality to shine at its best, Wein said. Protenga plans to expand into dry kibble and cat food. Protenga will distribute YumGrubs in Singapore and Malaysia at first, with the potential to expand regionally and to the U.S. and Europe. Furthermore, Protenga offers co-production services for other pet food brands around the world using its plant in Singapore.

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### **Insect protein sustainability and environmental impact**

In Protenga's facilities, the black soldier flies have lower food and water requirements than cows, chickens or other livestock. A higher volume of protein and oil can be raised on less land with insect compared to mammals or birds. For these reasons, insect-based ingredients may be an ecologically sustainable option. However, many pet foods are made with parts of those two-or-four-legged animals not eaten by humans. Comparing the ecological ramifications of cattle ranches to those of bug farms isn't straightforward. Insects may need less water and feed to produce a certain quantity of protein than cows. Yet, if the nutritious but low-status parts of that cow, such as hearts, don't go into pet food, those co-products drop in value and could go to waste. Scientists haven't fully unraveled these protein sustainability paradoxes.

Boosted by their positioning as a sustainable, healthy pet food ingredient, insects continue growing in pet food popularity globally. Yet in 2021, when scientists reviewed peer-reviewed research on insect-based ingredients in dog and cat foods, they found only two studies have evaluated how insect-based dog foods effect the nutritional status and health of dogs and none on cats. The researchers published their

scientific literature review in the Journal of Insects as Food and Feed.

As with sustainability, pet food marketing acclaims about insects as a natural part of dogs' and cats' ancestral diets may need to be tempered by evidence. While cats' wild relatives do consume insects, they made up less than 5% of their diets in biologists' observations. Wolves did not eat enough insects to make a significant portion of their diets. While many pet owners have seen their dogs and cats eat a random housefly, that may not mean the mammals evolved to eat insects.

#### **Limited research on insect-based pet food nutrition**

Although many pet owners have anecdotal stories of dogs and cats eating insects, scientists haven't fully studied the tiny animals' nutritional and health effects on dogs and cats. However, basic analysis of many insects, such as black soldier fly larvae and crickets, suggest that the tiny animals are packed with proteins and other nutrients that dogs and cats can readily digest. For example, silkworms showed promise as dog food ingredients. Scientists in Thailand fed dogs a diet containing silkworm, house crickets or a control diet with poultry meal. The journal *Animals* published their research.

“All insects are generally good sources of protein, B-vitamins and trace minerals,” said pet nutrition consultant Mark Finke, Ph.D. in a video from Petfood Forum. “Much of it depends on exactly what they are to be used for (what is their primary role in a complete and balanced pet food). So

black soldier fly larvae would be an excellent source of calcium as well, while crickets are relatively high in taurine. Note that some nutrients can easily be manipulated by diet so in some cases blanket statements should be made with great care.”

Insect-based pet foods are still in their early stages, perhaps more so than marketing might lead one to believe, Wein said. He sees tremendous room for insect-based pet foods and ingredients to expand as consumers increasingly demand sustainable, nutritious products. Insects meet many other trends driving consumer behaviors, beyond environment and health concerns. Protenga's system fits well with the global drive by consumers to know their farmers and know their foods. An insect farm can encapsulate the entire rearing, harvesting and processing of the arthropods. This allows a high degree of transparency.

Insect-based pet foods and the ingredients that go into them may be on trend, but they still have a way to go before becoming mainstream.

Eventually, there will be a tipping point, when more people will have heard of insects in pet food than not, Weiss said. That point may be another half decade away, but cultural and economic forces seem to be encouraging further use of insect-based pet food ingredients.

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### Ukraine wheat, oil disruptions may hit US pet food

**Any problems with Ukrainian commodity supplies could exacerbate existing supply chain problems.**

Although a tragic loss of life, the Russian escalation of the conflict in Ukraine on February 24 likely won't directly affect the U.S. pet food industry, but businesses may feel the effects of Ukrainian commodity export disruptions.

“Ukraine is not a major market for U.S. pet food right now, with US\$1.15 million in exports in 2021,” Betsy Flores, senior vice president of public policy for the Pet Food Institute (PFI). “However, the global pet food industry and broader food and agriculture sector may see impacts on some of the top commodities that Ukraine produces, particularly wheat and sunflower oil. These are both major exports from Ukraine and any disruption could have effects on the global ingredient marketplace.”

#### Ukraine conflict and the global supply chain

Any problems with Ukrainian commodity supplies could exacerbate existing supply chain problems. The fighting in the Black Sea region has caused uncertainty and higher prices, as Russia and Ukraine are major global producers of several grains and oilseeds, according to analysts with Rabobank, reported Feed Strategy. Ukraine and Russia export approximately 29% of the world's wheat exports per week.

However, the conflict likely won't change U.S. access to the Russian pet food market. The Russian market was already unavailable to U.S. pet food exporters.

“U.S. pet food makers currently don't have market access to Russia after the country's decision to ban animal food imports from many countries in late 2020, and it is not expected for that market to reopen in the foreseeable future,” Flores said. “PFI looks forward to re-visiting when it is appropriate, and working closely with the U.S. Department of Agriculture, Office of the U.S. Trade Representative, and the U.S. Food & Drug Administration to promote market access for U.S. pet food.”

### Dogs Plate launches wet dog food with insect protein

**he Polish pet food producer is expanding its product portfolio to help drive exports.**

Polish pet food company Dogs Plate has introduced a new range of wet dog food products with insect protein. The market response in Poland to this product line has been very positive, according to the company, and it is now planning to launch export sales to a number of European markets.

“We are also performing research and development work on similar products for cats, but compared with dogs, it is more difficult to develop recipes that they will enjoy,” said Monika Sankowska, production

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manager at Dogs Plate. “Regarding our export plans, our focus will most likely be on Western Europe as these markets are showing a rapidly rising interest in insect-based pet food.”

The company is headquartered in Swarzędz, in Poland’s western part, and operates a production facility in Poznań, about 12 kilometers from its offices.



### **Insect protein sourced in Poland**

For this new line of products, Dogs Plate sources raw materials from Polish insect-based protein producer HiProMine. In 2021, that company secured about PLN 26.1 million (US\$6.7 million) in funding from a total of 40 investors, enabling HiProMine to finance its further expansion as a protein supplier to the European pet food industry.

Damian Józefiak, president of the company’s management board and its co-founder, told Petfoodindustry.com at the time that 70% of HiProMine’s production was exported, mainly to pet food and feed producers from Germany, the UK and Scandinavia.

The remainder of HiProMine’s supplies goes to domestic companies. “In our production process, we use the insect-based protein paste and mix it with other ingredients, such as vegetables and supplements, to create a quality product that pets can enjoy,” said Sankowska of Dogs Plate.

### **New pet food products for vulnerable pets**

Meanwhile, in addition to its insect-based dog food, the company is also developing other products to cater to the needs of vulnerable pets, she said.

“Most recently, we also introduced a new line of pet food for animals who suffer from liver and kidney diseases, as well as allergies, and these products are selling very well. We will work to further expand this

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product range in the near future,” Sankowska said.

### How is shark in pet food despite Mars, Purina standards?

**A 2019 study found DNA from two shark species in pet foods sold in the United States. More recently, researchers identified shark genetic material in cat foods purchased in Singapore.**



Two independent studies have found evidence of endangered sharks in

pet food sold on opposite sides of the planet by some of the world’s top pet food companies. Yet the mystery remains how animals in danger of extinction, including mako or silky sharks, ended up in pet foods sold in Singapore or the United States. Neither Mars Petcare nor Nestlé Purina PetCare uses sharks in any of their recipes. Both have supply chain protocols designed to screen out ingredients made with sharks, along with other endangered species. While scientists have identified the genetic signatures of sharks in pet foods, researchers need to investigate how sharks enter the pet food chain despite preventive measures.

#### Studies found shark DNA in pet foods

A biologist identified 17 examples of DNA from endangered mako shark (*Isurus oxyrinchus*) and one from the blue shark (*Prionace glauca*) in pet foods sold in the U.S. He published his results in *Conservation Genetics* in 2019.

More recently, researchers identified shark genetic material in cat foods purchased in Singapore, including Fancy Feast, Sheba, Whiskas, Kit Cat and Aixia Yaizu. The scientists found genetic signatures of endangered silky sharks and other species in more than 30 pet foods made in Thailand. However, the study’s authors couldn’t determine the route by which the shark meat made its way into the pet food supply chain. Silky sharks face tremendous hunting pressure for their fins. The researchers speculated in the journal *Frontiers in Marine Science* that the presence of

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the silky sharks may reflect the use of the rest of their carcasses in pet food.

If so, it goes against the policies of the two largest pet food companies by annual revenue. Representatives of both Mars Petcare and Purina PetCare stated that their companies never use any sharks, much less endangered species, in recipes.

“If true, this is a deeply worrying study,” Lisa Campbell, external affairs director for Mars Petcare, told Petfood Industry in an email. “We do not source any endangered fish species, as defined by the International Union for Conservation of Nature (IUCN) Red List of Threatened Species.

Mars Petcare has reached out to suppliers associated with the pet foods involved in the Singapore study.

“All the materials and raw ingredients that we and our suppliers use must meet our own strict global internal quality and safety requirements,” she said. “We have conducted supply chain mapping and validated traceability systems of our suppliers which includes the ‘no shark finning policy’ according to traceability standards of the International Sustainable Seafood Foundation (ISSF).

“We do not use sharks in our supply chain. From this study, it asks us to look for the potential cross-contamination, for example, whether tuna intake may have caused cross-contamination. We have reached out to

our suppliers of the products indicated in the report to reiterate our clear standards and expectations and understand where control processes need to be strengthened if needed.”

Likewise, Purina uses various systems to trace the ingredients in its pet food.

“We have comprehensive Responsible Sourcing Guidelines to ensure that all wild-caught and farmed seafood supplied to Purina comes from responsible sources,” Wendy Vlieks, senior director of public relations for Nestlé Purina PetCare, wrote in an email. “Every Purina ingredient supplier must meet our stringent standards for ingredient specifications (product safety, sanitation and manufacturing practices). They must not source fish and seafood ingredients that contain IUCN (International Union for Conservation of Nature) red-listed endangered species and must not acquire or capture any illegal, unregulated and unreported (IUU) seafood.”

### **Stopping sharks from entering pet food supply chain**

While both pet food companies have policies in place, the mystery of shark meat in pet food remains. However, there are still only a few studies identifying sharks’ DNA in the pet food supply chain, and even less published research on how those endangered fish ended up in pet foods. Pet food companies aren’t intentionally adding sharks. On the contrary, they have extensive guidelines and rules to prevent

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endangered species from entering their supply chains. Yet, genetic evidence on opposite sides of the planet suggests that endangered sharks inadvertently enter the pet food supply chain. Frontiers in Marine Science study co-author Benjamin Wainwright, assistant professor of marine biology at Yale-NUS, suggested better labeling and more accountability throughout the supply chain.

“We have set a goal to use 100% sustainable fish in our recipes and today source 81% from sustainable sources,” Campbell said. “Fish is a key ingredient for some of our pet food recipes for its nutritional value and, while we source a very small amount of fish overall, we know we have a responsibility to drive sustainable fishing.

“Mars Petcare believes supply chain mapping is an integral part of traceability as it helps us to identify if any vessel in our supply chain is engaging in Illegal, Unreported and Unregulated (IUU) fishing, which would violate our sourcing policies. Mars Petcare has conducted 100% supply chain mapping of our Thai fish supply chains across our Tier 1 fish suppliers as per the Seafood Taskforce membership requirements, Mars Petcare had served previously as a Board member and active contributor to this Taskforce.

“Mars Petcare is also partnering with WWF as we gradually shift towards compliance to the Global Dialogue on Seafood Traceability (GDST) as part of increasing seafood transparency and harmonization of



different traceability standards.”

No answers have been found to the conundrum of shark DNA appearing in pet food. Increased vigilance and traceability may be the solution, even if the precise route by which sharks entered the pet food supply chain remains a mystery.

## MARKET NEWS - REPLY

If you have any comments on the articles in the pet food newsletter, please feel free to contact us on the following email address:

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