



## **Position on the Proposal for a Regulation on the manufacture, placing on the market and use of medicated feed**

COM(2014) 556 final, 2014/0255 (COD)

### **1. About the EU Dog and Cat Alliance**

The EU Dog and Cat Alliance represents over 40 organisations from across the European Union. This includes veterinary organisations, organisations which are involved in the rescue/rehoming of dogs and cats and organisations which are working to protect dog and/or cat welfare. The Alliance's main focus is on lobbying the EU to introduce and improve EU legislation in relation to dogs and cats.

### **2. Background**

In September 2014, the European Commission adopted a proposal for a Regulation on the manufacture, placing on the market and use of medicated feed. This proposal will update the current legislation on medicated feed by repealing Directive 90/167/EEC. The proposal for a new Regulation explicitly includes permission to use medicated feed for pet animals.

### **3. General position**

The EU Dog and Cat Alliance has the following concerns about medicated feed for dogs and cats:

- There are currently very few medicated feeds available on the market for dogs and cats. We believe that this is an area in which further research is needed to demonstrate that medicated feed can be beneficial, and not detrimental, to their health and welfare.
- In the EU, many households have more than one pet animal. For example, in 2013, 19% of German households were estimated to own at least 2 pet animals<sup>1</sup>. In households with multiple dogs and/or cats it would be extremely difficult to ensure that only the target animal consumed the medicated feed.
- Statistics from the UK estimate that 68% of pet owners do not follow professional guidance when deciding portion size for their pet<sup>2</sup>. In the case of medicated feed, feeding too much or too little would result in over or under dosing.

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<sup>1</sup> Industrieverband Heimtierbedarf (IVH). The German Pet Market (2013): [http://www.ivh-online.de/uploads/media/Infografics\\_Pets\\_in\\_Germany\\_2013\\_01.pdf](http://www.ivh-online.de/uploads/media/Infografics_Pets_in_Germany_2013_01.pdf)

<sup>2</sup> Pet Food Manufacturers Association (PFMA). Pet Obesity: Five Years On (2014): [http://www.pfma.org.uk/assets/docs/PFMA\\_WhitePaper\\_2014.pdf](http://www.pfma.org.uk/assets/docs/PFMA_WhitePaper_2014.pdf)



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- The dose of many medicines is adjusted to achieve the appropriate clinical outcome. If the medicine is an integral part of the feed it will be impossible to alter the dose without adjusting the amount of feed required, so encouraging over- or under-feeding
- When dogs and cats are ill, they may eat less than normal which could also result in under dosing.
- Depending on the medication, if the animal does not eat the required portion of medicated feed within a certain amount of time then the active ingredient may never reach the appropriate therapeutic level.
- From the limited information currently available, palatable medicines might be a safer and more effective approach e.g. those medicines for cats awarded 'easy to give' status by International Cat Care: <http://www.icatcare.org:8080/cat-campaigns/easy-give>

Due to these concerns, the EU Dog and Cat Alliance believes that further research is needed to demonstrate that treatment of dogs and cats with medicated feed can be beneficial to health and welfare, with minimal risks. We therefore believe that medicated feed for dogs and cats should be excluded from the general scope of the proposed Regulation at this time. However, it should be possible to introduce secondary legislation to permit the use of medicated feed for dogs and cats, under clearly defined conditions, should future research support this.