



# Campaign for Superior Quality Nutrition

Supreme Petfoods Ltd

**Executive Summary**  
of a  
Report into  
Manufacturing and Marketing  
of  
Small Animal Pet Foods  
and the  
Adequacy of Current Legislation and  
Enforcement

## Executive Summary

The recent decision by Supreme Petfoods to benchmark its competitors' key food products has resulted in the discovery of apparent contraventions of current legislation.

Supreme has always had 'the wellbeing of small animals' as its ethos and has continuously striven to produce the highest quality foods available, for the benefit of the animal and the trust of the consumer.

A claim of quality is always difficult to substantiate without proof. Many new and established competitors have been making similar quality claims for their products, but Supreme felt some of these were open to question. It was for this reason that Supreme requested Campden BRI to conduct independent testing.

The key highlights of those results are:

- Contamination from meat sources found in competitors' products.
- Some fibre levels that were substantially below legal tolerance compared with declared levels.
- Terms like 'beneficial fibre' in the statutory statement, which appear to be unapproved descriptions.
- Levels of sugar, given the recent campaign for rabbit obesity, which could be of potential concern to veterinarians and owners.
- Use of a probiotic authorised only for use within feeds for fattening, but found in pet rabbit diets.
- Claim for 'complete food' when only 8% fibre is declared on pack.
- Potential risk to human health as competitors' rabbit food is sold VAT free for use as an animal feedstuff while containing meat DNA.

The analysis of 24 rabbit food samples manufactured and marketed by Burgess, Wagg and Beaphar demonstrated a contamination level so prevalent that traces of DNA from cattle, pig, chicken or turkey were found in 11 of the samples. These random samples were taken from retailer's shelves across the country.

In our opinion, the physiology of herbivores such as rabbits is unsuited to digest meat. This ignores the ethical question as to whether animal owners would knowingly feed a product, which could have the potential of containing meat.

Beaphar Care + Rabbit, marketed in the UK as a “super premium” complete diet, declares 22% crude fibre on pack but measured an average of 14.9%, which is outside legal tolerance. This potentially misleads consumers.

Burgess’ new rabbit diets state an analysis level for something they call “Beneficial fibre”. There is no statutory definition for this term, but the Feeding Stuffs Regulations state that crude fibre is the only declarable definition in the statutory statement.

Added sugar offers no known benefits, but nor is there any legally required declaration for some products. Complementary molassed diets should declare total sugar as sucrose. The regulations permit raw materials to be ‘categorised’ therefore enabling some high sugar ingredients to be declared as ‘derivatives of vegetable origin’.

The highest average levels of sugar were found in Wagg Optimum (4.57%), Beaphar Care + (5.00%), Burgess Supa Fruiti (5.10%), Beaphar Extra Vital (5.35%) and Burgess Excel (4.04%).

The new Burgess Excel Junior & Dwarf Rabbit diet contains the probiotic *Saccharomyces cerevisia*. This is listed only for use within feeds for the purpose of fattening animals, in combination with a coccidiostat.

Su-Bridge Supa Select Rabbit Mix declares 8% fibre on pack and yet describes itself as a “complete” food. This fibre level is well below any widely accepted nutritional guideline. It therefore might mislead the consumer and may compromise the pet rabbit’s welfare.

Manufacturers such as Burgess and Wagg mix small animal herbivore diets in manufacturing plants that also produce food for dogs and cats, which are omnivores and carnivores. The potential for cross contamination, now proven by the Campden BRI tests, has possible implications for the human consumption of rabbit meat. Burgess and Wagg rabbit diets are not marketed as pet food as they do not charge VAT at standard rates, and may therefore be sold to rabbit breeders for the human food chain.

There could be a further issue of cross contamination with the manufacture of raw material components; for example, by- and waste products deemed as “meat free”, being sold on to manufacturing facilities producing herbivore diets. The third party customer may be unaware that their product quality is compromised by potential meat contamination.

In an industry worth over £600m in Europe, Supreme Petfoods believes it is duty bound to disclose the results of these tests and reports because they are significant enough to require immediate investigation on the part of the authorities and manufacturers.

Therefore, copies of the main report have been passed to DEFRA, Trading Standards, Pet Advisory Committee, PFMA, BSAVA, RSPCA and other interested parties. In our opinion, it is evident that immediate action is required to protect the welfare of small animals and improve the accuracy and clarity of packaging declarations for all consumers.

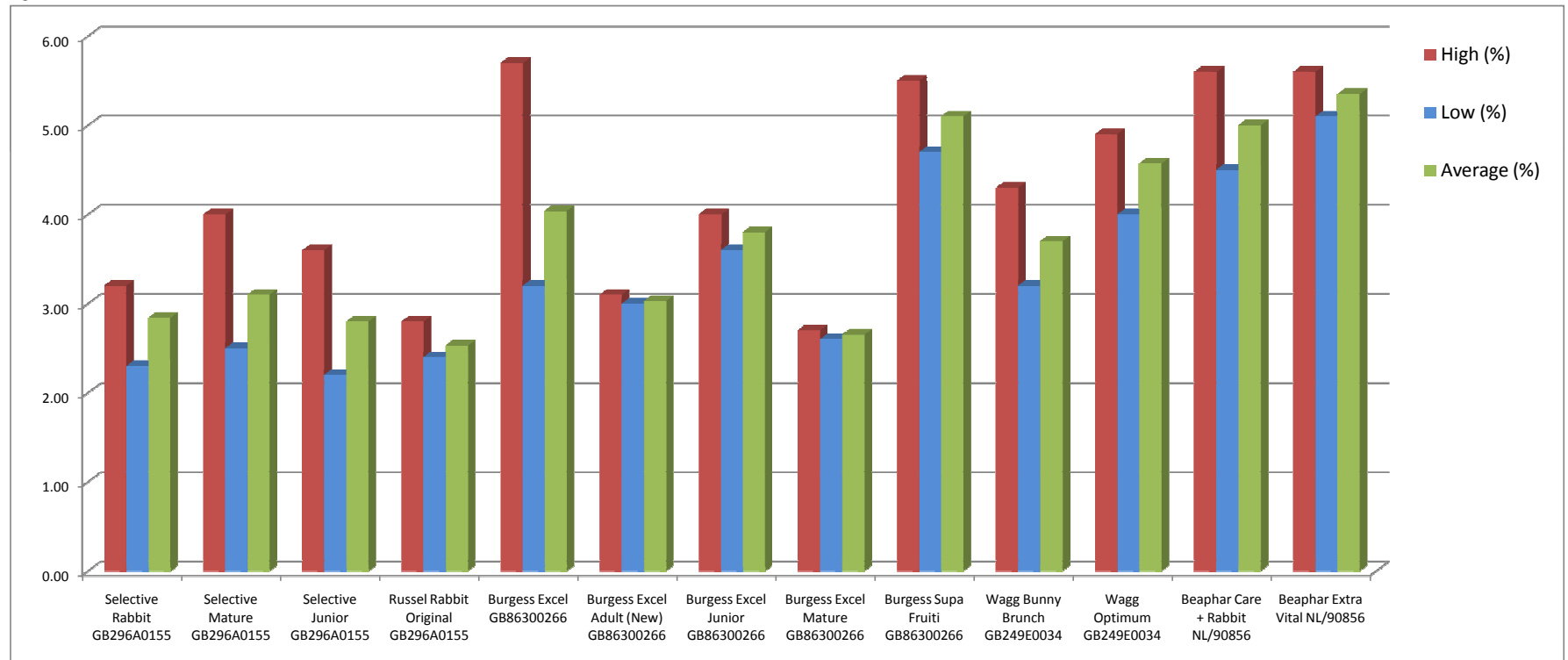
Supreme Petfoods Ltd now proposes that all manufacturers producing small animal diets adopt an accreditation scheme, which forms part of detailed recommendations as shown below.

**Table 1 : Figure 1**

**Sugar Content - Total Sugars Expressed as Sucrose**

Table 1	Selective Rabbit GB296A0155	Selective Mature GB296A0155	Selective Junior GB296A0155	Russel Rabbit Original GB296A0155	Burgess Excel GB86300266	Burgess Excel Adult (New) GB86300266	Burgess Excel Junior GB86300266	Burgess Excel Mature GB86300266	Burgess Supa Fruiti GB86300266	Wagg Bunny Brunch GB249E0034	Wagg Optimum GB249E0034	Beaphar Care + Rabbit NL/90856	Beaphar Extra Vital NL/90856
High (%)	3.20	4.00	3.60	2.80	5.70	3.10	4.00	2.70	5.50	4.30	4.90	5.60	5.60
Low (%)	2.30	2.50	2.20	2.40	3.20	3.00	3.60	2.60	4.70	3.20	4.00	4.50	5.10
Average (%)	2.84	3.10	2.80	2.53	4.04	3.03	3.80	2.65	5.10	3.70	4.57	5.00	5.35

**Figure 1**



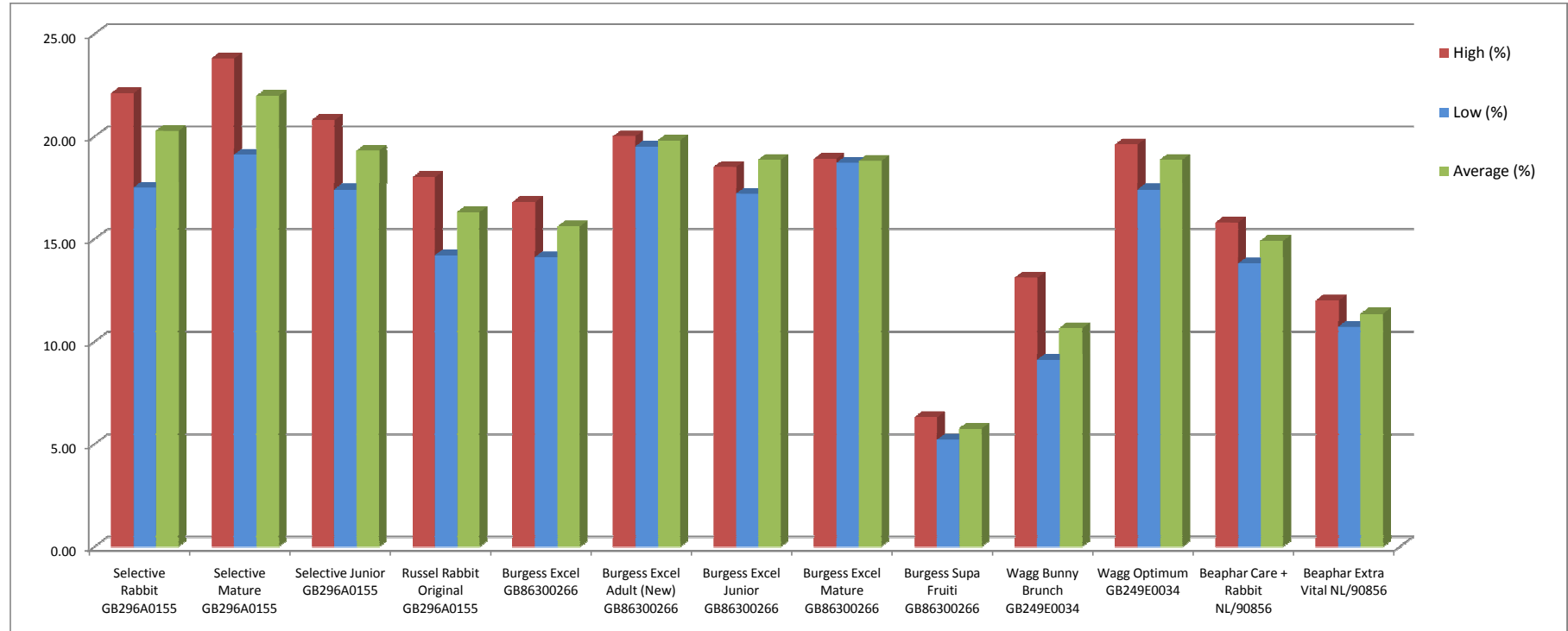
High (%) Indicates highest result reported  
 Low (%) Indicates lowest result reported  
 Average (%) Indicates average of all reported results

**Table 2 : Figure 2**

**Crude Fibre Content**

Table 2	Selective Rabbit GB296A0155	Selective Mature GB296A0155	Selective Junior GB296A0155	Russel Rabbit Original GB296A0155	Burgess Excel GB86300266	Burgess Excel Adult (New) GB86300266	Burgess Excel Junior GB86300266	Burgess Excel Mature GB86300266	Burgess Supa Fruiti GB86300266	Wagg Bunny Brunch GB249E0034	Wagg Optimum GB249E0034	Beaphar Care + Rabbit NL/90856	Beaphar Extra Vital NL/90856
High (%)	22.10	23.80	20.80	18.00	16.80	20.00	18.50	18.90	6.30	13.10	19.60	15.80	12.00
Low (%)	17.50	19.10	17.40	14.20	14.10	19.50	17.20	18.70	5.20	9.10	17.40	13.80	10.70
Average (%)	20.27	21.97	19.30	16.30	15.60	19.80	18.85	18.80	5.75	10.65	18.85	14.90	11.35
Declaration (%)	19.00	22.00	19.00	14.00	16.00	19.00	17.00	19.00	7.00	10.00	17.50	22.00	13.40

**Figure 2**

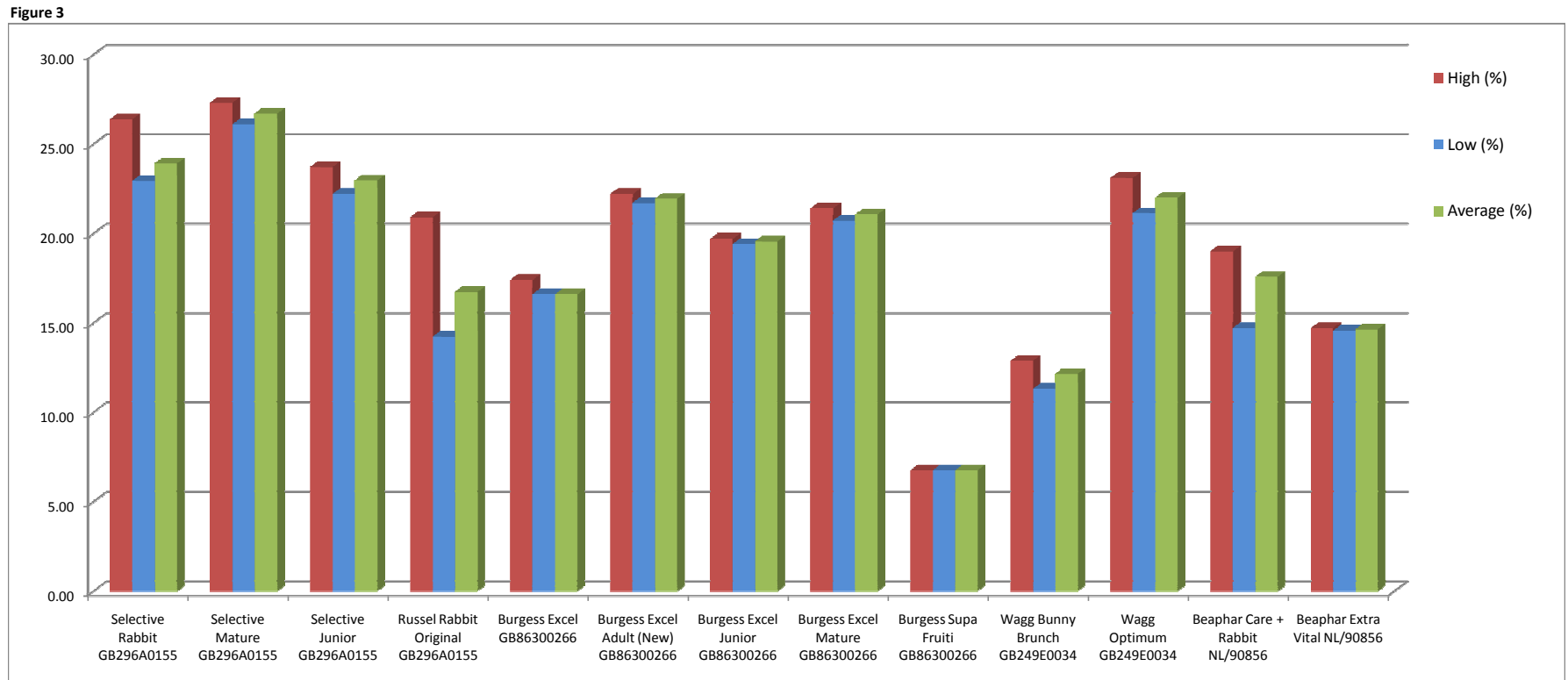


High (%) Indicates highest result reported  
 Low (%) Indicates lowest result reported  
 Average (%) Indicates average of all reported results

**Table 3 : Figure 3**

**ADF Content (Acid Detergent Fibre)**

Table 3	Selective Rabbit GB296A0155	Selective Mature GB296A0155	Selective Junior GB296A0155	Russel Rabbit Original GB296A0155	Burgess Excel GB86300266	Burgess Excel Adult (New) GB86300266	Burgess Excel Junior GB86300266	Burgess Excel Mature GB86300266	Burgess Supa Fruiti GB86300266	Wagg Bunny Brunch GB249E0034	Wagg Optimum GB249E0034	Beaphar Care + Rabbit NL/90856	Beaphar Extra Vital NL/90856
High (%)	26.38	27.30	23.70	20.90	17.40	22.20	19.70	21.40	6.75	12.87	23.10	19.00	14.70
Low (%)	22.93	26.10	22.20	14.22	16.60	21.70	19.40	20.70	6.75	11.30	21.13	14.70	14.55
Average (%)	23.90	26.70	22.95	16.72	16.60	21.93	19.55	21.05	6.75	12.13	21.99	17.56	14.63

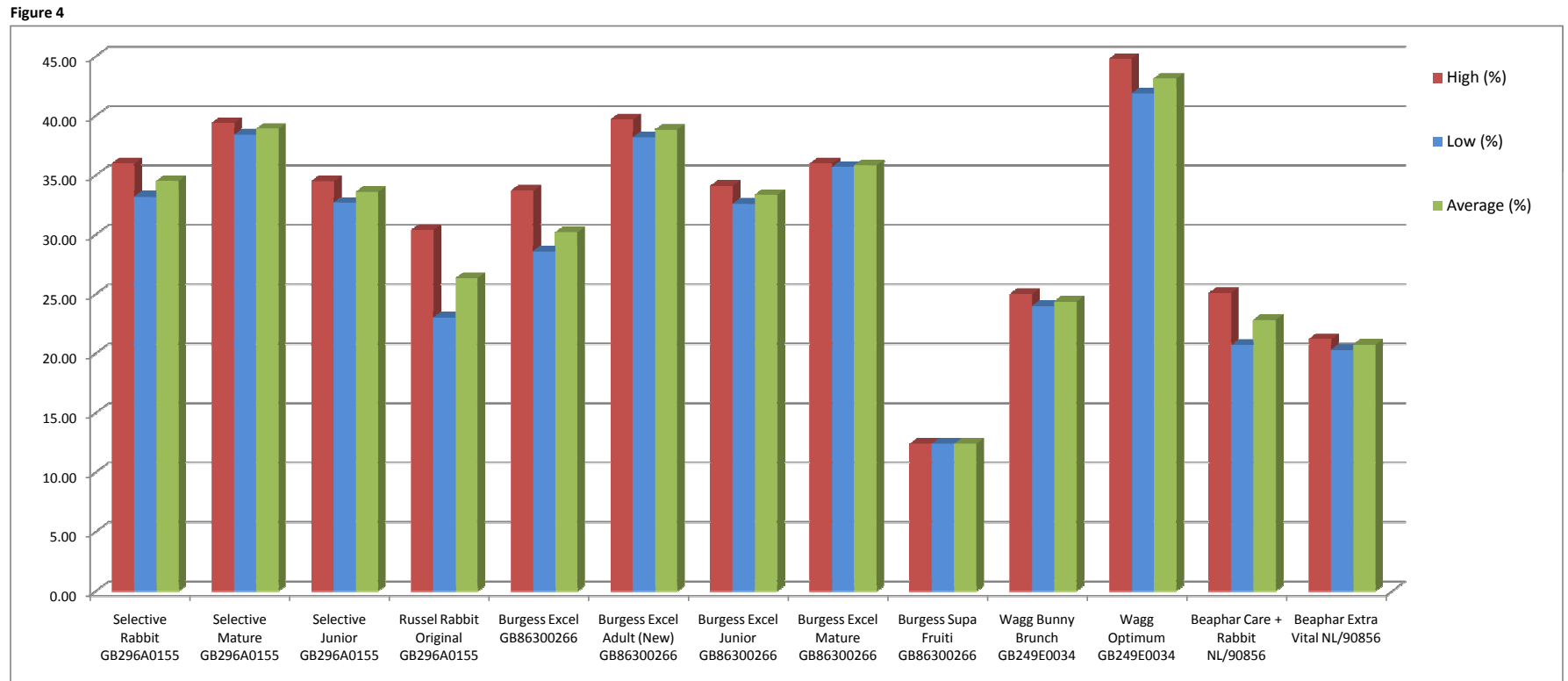


High (%) Indicates highest result reported  
 Low (%) Indicates lowest result reported  
 Average (%) Indicates average of all reported results

**Table 4 : Figure 4**

**NDF Content (Neutral Detergent Fibre)**

Table 4	Selective Rabbit GB296A0155	Selective Mature GB296A0155	Selective Junior GB296A0155	Russel Rabbit Original GB296A0155	Burgess Excel GB86300266	Burgess Excel Adult (New) GB86300266	Burgess Excel Junior GB86300266	Burgess Excel Mature GB86300266	Burgess Supa Fruiti GB86300266	Wagg Bunny Brunch GB249E0034	Wagg Optimum GB249E0034	Beaphar Care + Rabbit NL/90856	Beaphar Extra Vital NL/90856
High (%)	36.00	39.40	34.50	30.40	33.70	39.70	34.10	36.00	12.40	25.00	44.80	25.10	21.20
Low (%)	33.20	38.40	32.70	23.03	28.60	38.20	32.60	35.70	12.40	24.00	41.90	20.70	20.30
Average (%)	34.52	38.90	33.60	26.34	30.20	38.83	33.35	35.85	12.40	24.37	43.13	22.83	20.75



High (%) Indicates highest result reported  
 Low (%) Indicates lowest result reported  
 Average (%) Indicates average of all reported results



**Table 5 : Figure 5**

**Meat Species Trace DNA Contamination by PCR Analysis**

Table 5	Selective Rabbit GB296A0155	Selective Mature GB296A0155	Selective Junior GB296A0155	Russel Rabbit Original GB296A0155	Burgess Excel GB86300266	Burgess Excel Adult (New) GB86300266	Burgess Excel Junior GB86300266	Burgess Excel Mature GB86300266	Burgess Supa Fruiti GB86300266	Wagg Bunny Brunch GB249E0034	Wagg Optimum GB249E0034	Beaphar Care + Rabbit NL/90856	Beaphar Extra Vital NL/90856
Total No. of Analysis	13.00	5.00	5.00	0.00	21.00	14.00	9.00	8.00	7.00	15.00	25.00	4.00	0.00
Total No. of Trace Results	0.00	0.00	0.00	0.00	2.00	1.00	1.00	2.00	3.00	0.00	3.00	1.00	0.00
Trace Frequency (%)	0.00	0.00	0.00	0.00	9.52	7.14	11.11	25.00	42.86	0.00	12.00	25.00	0.00

Figure 5

