

## Still Shocked and Saddened

I'm sorry, Susan Thixton, but I don't buy your arguments (<http://truthaboutpetfood.com/it-is-not-junk-science/>). Let me respond to a few points and then I'll shut up and allow readers to draw their own conclusions.

1. Let me begin by acknowledging that aflatoxin levels are, indeed, quoted in parts per billion. I should have made that clear. Fumonisin guidelines, on the other hand, are quoted in parts per million. See FDA document 7303.001 for this information.
2. The use of "qualifying pathogens" in the context of this pet food report is out of context with FDA's purpose in establishing this list. The "qualifying pathogens" list was established in order to establish priorities for encouraging "...the development of new antibacterial and anti fungal drugs for the treatment of serious or life-threatening infections." The term is not a commentary on the risk to human or animal health posed by these microorganisms when present in the environment or in a food product, whether human or animal.
3. The entire genus *Staphylococcus* and the entire genus *Streptococcus* are not qualifying pathogens. Only certain species within these two genera are mentioned in the FDA Final Rule. This is akin to reasoning that because a hawk is a bird and a hawk is a predator, therefore all birds are predators. Just because methicillin-resistant *Staphylococcus aureus* and vancomycin-resistant *Staphylococcus aureus* are on the qualifying pathogens list, that does not mean that ALL *Staphylococcus* are "qualifying pathogens," even assuming the relevance of the designation to this pet food testing project.
4. In saying that a pathogen such as *Acinetobacter* is mainly associated with hospital-acquired infections, this does not mean that *Acinetobacter* is mainly or only found in hospitals. Rather, it means that most infections caused by *Acinetobacter* are hospital-acquired. *Acinetobacter* are widely found in the environment, in soil, and even on human skin.
5. I am not disputing the capabilities of Dr. Gary Pusillo as a veterinary nutritionist. Nor have I made any comments on the nutritional testing portion of the study, because veterinary nutrition is outside of my area of expertise, just as microbiology is outside of the expertise of Dr. Pusillo. Similarly, Dr. Purejav's degrees are in the area of animal science, according to his LinkedIn profile. Would you ask a gastroenterologist to diagnose a neurological problem or read and magnetic resonance images of the brain? Of course not. Why, then, should one expect a veterinary nutritionist and an animal science expert to be the most appropriate individuals to develop, oversee and interpret the results of a microbiology testing program?

6. With all due respect to the reputation and status of Baylor University, the more closely I look at the microbiology findings -especially from the canned foods – the more skeptical I become as to the protocol used during testing. Canned foods should be sterile, with the possible exception of a few spores of highly heat-resistant bacteria. Yet a significant number of the canned food samples were found to contain a long list of microbes that are not especially heat-resistant. It takes special training and equipment and a highly controlled and sterile environment to conduct a reliable microbiology test on a canned food. Contamination of the sample by the lab analyst can occur all too easily. Not all labs are equipped for this level of testing, and not every lab technician or microbiologist has received the necessary training to perform the testing correctly. Baylor's Microbiology program is housed within its College of Medicine, whereas this type of testing is more commonly taught in a food or pharmaceutical microbiology setting.

7. There is no such thing as searching for "all bacteria" in a food sample. Either a lab is provided with a list of bacteria to search for, or the lab will be asked to isolate and identify as many different bacteria from the sample as possible. Bacteria that are faster or more robust in their growth, or that are present at higher concentrations may outgrow and mask the presence of other bacteria in a sample. If the lab was provided with a list, then that list should have been included in the report.

Finally, Susan, we do not live in a sterile world. There are bacteria in and on just about everything with which we and our pets come into contact. Some of these bacteria are helpful – such as those that ferment milk or those that are used to produce beer or wine; some of them are benign – neither helpful nor harmful in most circumstances. And some – the minority – are pathogens, capable of causing infections in humans or animals. That is the world we live in.

As for the study that you commissioned, I applaud your good intentions. But, in my opinion, the outcome is still junk science.

Phyllis Entis

January 08, 2015

Source: <https://efoodalert.wordpress.com/2015/01/08/still-shocked-and-saddened/>

Phyllis Entis credentials:

A BSc. from McGill University in Montreal (Honours Microbiology & Immunology), and a MSc. from the University of Toronto (Mycology). I was employed as a microbiologist by Canada's Health Protection Branch (Canadian equivalent of FDA) from 1972 to 1979, and spent the last four years as head of the microbiology lab group for the Quebec Region. From 1979 to 2001, I was Research Director of QA Laboratories Limited (in Canada) and QA Life Sciences, Inc. (in the USA), during which time I was responsible for developing a series of rapid tests for food borne pathogens, validating those tests through AOAC International, and providing technical support to the Company's clients, which included some of the largest national and multinational food companies. After 2001, I was a consultant to several clients, including a number of attorneys who represented victims of food poisoning. I have written two text books: FOOD MICROBIOLOGY - THE LABORATORY (Published by Food Processors Institute) and FOOD SAFETY: OLD HABITS, NEW PERSPECTIVES (Published in 2007 by the American Society for Microbiology Press). I developed, researched and wrote the eFoodAlert food safety blog for five years, retiring in 2013 to turn my attention to writing fiction.

O nutrição.Vet tem a missão e compromisso com seus leitores de publicar somente informação cientificamente embasada ou artigos redigidos por profissionais da nutrição animal capacitados e que não estão trabalhando para empresas privadas do universo pet food. Por este motivo o **nutrição.Vet** não divulgou o estudo conduzido pela associação the truth about pet food: o estudo nem foi publicado em revista indexada que tenha os artigos revisados por pares (especialistas na mesma área da ciência), nem foi redigido por veterinários nutricionistas experientes e estudiosos do assunto. Portanto a atividade não se qualifica de nenhuma forma.

Sobre este mesmo assunto há os textos produzidos por profissionais titulados e experientes nas áreas sobre as quais fazem comentários:

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Sobre microbiologia / About microbiology

<http://www.foodsafetynews.com/2015/01/shocked-and-saddened/#.VMJxKsJ0zIU> By [Phyllis Entis](#) | January 9, 2015

<https://efoodalert.wordpress.com/2015/01/08/still-shocked-and-saddened/> By [Phyllis Entis](#) | January 9, 2015

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Sobre pesquisa e uso de dados e sobre a parte nutricional / About researches and about nutrition

Fonte original em inglês. <https://weethnutrition.wordpress.com/2015/01/11/the-importance-of-peer-review-or-how-to-spot-a-huckster/comment-page-1/#comment-59> [traduzido

Dr. Lisa Weeth credentials

Dr. Lisa P. Weeth, DVM, MRCVS, DACVN

[Médica veterinária, veterinária nutricionista certificada pelo colégio americano de nutrição veterinária ].

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Sobre pesquisa e uso de dados / About researches

<http://pawcurious.com/2015/01/the-truth-about-pet-food-research/> by [Jessica Vogelsang](#) | January 11, 2015.

Dr. Jessica Vogelsang credentials

Dr. Jessica Vogelsang (Dr. V.) is a veterinarian graduated of the prestigious UC Davis School of Veterinary Medicine with experience in both emergency and general practice is one of a small group of veterinary and journalism experts to have earned the title of Certified Veterinary Journalist through the American Society of Veterinary Journalists. As a pain management advocate, she completed a comprehensive course in veterinary acupuncture through the International Veterinary Acupuncture Society early in her career. Her professional affiliations and memberships include: American Veterinary Medical Association - San Diego County Veterinary Medical Association - American Society of Veterinary Journalists - Association for Pet Loss and Bereavement - International Association of Animal Hospice and Palliative Care - International Veterinary Academy of Pain Management - World Vets.

The **nutrição.Vet**'s mission and commitment to its readers is to publish only scientifically based information or articles written by graduated professionals of animal feed that are not working for private companies in the pet food universe. For this reason the **nutrição.Vet** not released the study conducted by association the truth about pet food: the study nor was published in indexed journal that has the peer-reviewed articles (experts in the same field of science), nor was it written by experienced veterinary nutritionists. Therefore the activity does not qualify in any way. On this same subject there are the texts produced by certified and experienced professionals in the areas on which make comments:

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Sobre microbiologia / About microbiology

<http://www.foodsafetynews.com/2015/01/shocked-and-saddened/#.VMJxKsJ0zIU> By [Phyllis Entis](#) | January 8, 2015

<https://efoodalert.wordpress.com/2015/01/08/still-shocked-and-saddened/> By [Phyllis Entis](#) | January 8, 2015

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