

Submission: Tom Lonsdale BVetMed, MRCVS

Summary: This submission together with *Raw Meaty Bones: Promote Health, Work Wonders: Feed your dog raw meaty bones* and the web links provides a glimpse into the multifaceted, \$multi-billion confidence trick that is the processed pet-food industry. The assumptions and terms of reference inherent in the current inquiry are shown to be inadequate. Nevertheless, this Australian Senate Inquiry represents the first most important step in righting the wrongs of 150 years of regulatory failure. A wide ranging commission of inquiry with full judicial powers is recommended prior to the institution of corrective measures. For a thirteen page overview please see unabridged *Nexus* article: [Junk Pet Food and the Damage Done](#)

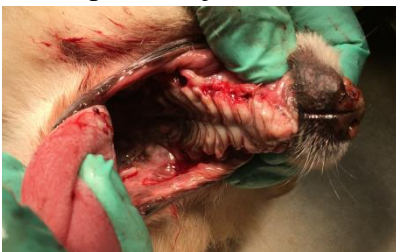
Dear Senators,

Please note the glowing good health, shine on the coats and smile on the faces of raw meaty bones fed [working dogs](#).

Please make the comparison with Kitty below, typical voiceless victim of the junk pet-food/vet/fake animal welfare alliance.



Kitty, 12 year old Pomeranian, undergoes total tooth extraction after a lifetime of torture eating Mars Corporation junk food.



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Regulatory approaches to ensure the safety of pet food

Introduction

As a student at the Royal Veterinary College, University of London from 1967 to 1972 I began to feel uneasy about the arbitrariness of the veterinary endeavour. However, almost 20 years elapsed before I gained a solid understanding of the inconsistencies and irregularities of the veterinary culture that on the one hand is dedicated to the preservation of life and the prevention of suffering and on the other hand turning a blind eye to mass cruelty and suffering arising from the junk pet-food scourge.

When preparing my contribution to the 1991 Veterinarians and the Environment Conference, I researched and drew together the various strands of information. It became clear that the veterinary environmental footprint exists primarily as a result of global veterinary involvement with the artificial pet-food industry. Since 1991 I have continued researching the factors — scientific, clinical, regulatory, economic and political — as they affect the safety of pet food.

Reduced to its elements, the pet-food industry relentlessly promotes carnivore pet ownership not as modified wolves (dogs), modified desert predators (cats) and modified polecats (ferrets) with biologically defined nutritional imperatives, but as animated furry toys. The furry toys are to be fed furry toy formula — bearing no resemblance to the natural carnivore food/medicine. In the event that the ‘toys’ become sick, as they must surely do, then there’s a repair man/woman (vet) only too keen to provide treatment, but never prevention, for the litany of ailments directly or indirectly attributable to the junk food diet.

The veterinary profession, by various subtle and not so subtle means, has been co-opted to the junk pet-food companies’ cause. Vets are the primary beneficiaries of the pandemics of pet ill health. Vets are, for the most part, staunch promoters and defenders of the junk pet-food products and the companies that make them. Alongside the vets, the animal welfare groups manage the oversupply of pets and discarded pets. Since every additional pet mouth is worth around \$15,000 to the processed pet-food industry, it’s small wonder that the companies pay hush money to the charities and the charities spout industry propaganda — whether in their vet clinics, gala events and submissions.

Insofar as new regulatory proposals are mooted I can comment, from bitter experience, about systematic regulatory failures as a result of junk pet-food company influence and control of the regulatory mechanisms. In [1994 Dr Barbara Fougere, Mars Corporation employee](#), brought a complaint against me in her private capacity that the NSW Board of Veterinary Surgeons attempted to keep confidential. So began serial harassment and the prosecution of pet-food company inspired complaints by the NSW Board of Veterinary Surgeons through its Veterinary Surgeons Investigating Committee (VSIC). Complaints to the VSIC cannot be publicly discussed under penalty of a \$2,000 fine and/or a year in jail. Consequently, for the companies, using the government regulatory apparatus of the VSIC was an effective strategy for silencing dissent away from public gaze. Whilst the NSW Board was harassing me they were not, in keeping with all other Australian veterinary boards, [investigating and dealing with allegations of widespread animal cruelty, over-servicing by vets, public safety and consumer fraud](#).

[Since 1992 I have endeavoured](#), through correspondence and by standing in annual elections, to persuade the UK veterinary regulator, the Royal College of Veterinary Surgeons, to investigate and resolve the junk pet-food issue — entirely without success. Similarly in Australia, together with Dr Breck Muir, I attempted to influence the Australian Veterinary Association. The Association, closely allied with the pet-food industry, refused to listen and in 2004 convened a [kangaroo court and terminated my membership](#).

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Effectively, I suggest that the junk pet-food/vet/fake animal welfare alliance hides in plain sight whilst engaged in \$multi-billion white collar criminal activity that inflicts immense harm on pets, pet owners and the wider community.

Matters of such magnitude are difficult to encapsulate in a submission. However, I believe that the 2001 book *Raw Meaty Bones: Promotes Health* provides a treatise on the interrelated aspects. The easy reader, *Work Wonders: Feed your dog raw meaty bones* provides simple solutions for pet owners attempting to free themselves from the oppression of pet-food company propaganda and a compromised veterinary profession.

Brief history

From the outset processed pet food was a giant confidence trick perpetrated upon an unsuspecting populace. At the time of the American Civil War when quack medicine men refined the art of creative hyperbole, [American entrepreneur Jack Spratt](#) is credited with establishing the first industrial scale production of processed pet food. Spratt's concoction of wheat, vegetables, beetroot and beef blood sold under the label 'Patent Meat Fibrine Dog Cake'. The young [Charles Cruft](#), showman and marketeer, aided in the enterprise. Cruft hit on the idea of promoting pedigree dog shows as a means to promoting dog ownership and thus selling Dog Cake.

Spratt and Cruft became rich and influential. Crufts Dog Show and the pet keeping, pet feeding fantasy they created lives on ever stronger promoted by vast multinational corporations and their vet collaborators.

Australian uptake of the canned and packaged offerings lagged behind the USA and UK until 1966. That was the year young John Mars set up his [factory in Albury Wodonga](#) and his Petcare Information and Advisory Service (PIAS), the public relations and [marketing front](#) established to convert the Australian public to Mars's way of thinking. Targeting radio, TV, magazines, newspapers, vets and vet associations PIAS was hugely successful. (See PIAS and Dr Jonica Newby in *Raw Meaty Bones*.)

Nowadays paid pet-food ads flood the airwaves. Newspapers and magazines provide free advertorials and promotions for pet keeping and vet services. Dogs and cats are shown swallowing the 2018 version of Dog Cake. It's all positive feedback, a reflective mirror, to those who have succumbed to the 150 years of cultural conditioning. For those who do not yet have a pet and do not yet visit the supermarket pet-food aisle, there's the constant reminder that they too can have the canine, feline status symbols when the opportunity presents.

The fantasy that modified wolves and desert cats, unlike their wild and feral counterparts, are somehow better suited to feeding out of the can or packet has spawned an enormous research and marketing drive.

Inevitably, with an industry founded on fallacy, things must go wrong.

In 2007, following the [contamination of junk pet food with the chemical melamine](#), thousands of dogs died. This was a case of confidence trickery piled on confidence trickery. Dogs and cats are carnivores evolved to consume a high protein diet. Pet-food manufacturers augment their products with wheat gluten. Gluten, rich in plant protein, allows the manufacturers to claim a higher protein content for their products. Unfortunately the cheaper inferior plant protein, as opposed to meat protein, is not as biologically available to the unfortunate dogs and cats forced to consume the product.

Since testing for protein is not so straightforward, testing for nitrogen content is more commonly employed. Chinese suppliers of wheat gluten reinforced their shipments with melamine and thereby increased the nitrogen, and thus the presumed protein, test score. Unfortunately melamine adulterated 'food' also increased the toxicity of the junk food.

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2007 was the year the media took a closer look at the artificial pet-food industry. The September 2007 [New York Times exposé provides essential insights](#) into the attitudes and values of the junk pet-food industry and the vet collaborators:

Dogs can get along just fine on a daily ration of corn and soybeans. “That’s about the cheapest diet you could put together,” Fahey said, and it provides all the vitamins, minerals, protein, fat and carbohydrates a dog needs. But it wouldn’t sell to broad segments of the modern market.

So much for the industry claims of ‘complete and balanced’ nutrition touted by the manufacturers, vets and fake welfare groups as superior fare. The grim reality is least-cost formulations designed to trick pets’ digestive systems and least-cost formulations acceptable in the family home.

Now, in 2018, millions of Australians have bought the fantasy that dogs — even those that look like wolves, for instance police dogs — should be fed from the junk food sack. When nine Victorian police dogs succumbed to a rare disease, megaesophagus, believed to be attributable to the Mars Corporation, Advance Dermocare dry kibble there was an outpouring of indignation followed by calls for more and better regulation. There was and is no outcry about the vets prescribing the unsuitable, unsafe products in the first place. There was and is no outcry against the endless list of junk food induced diseases that claim the lives of hundreds, perhaps thousands, of pets every day.

Calculating niche marketers have noticed. They have discovered the simple truth that by stopping the feeding of industrial pet food, animals show a remarkable turnaround in health and vitality. Attributing the observed improvements to their minced meat, fruit and supplement concoctions a slew of ‘nutritionist’, ‘BARF’ and ‘prey-model’ proponents ramp up their marketing efforts. They boast that their wares contain *ground* bone and thus shield the sensibilities of their customers from the imagined horrors of raw meaty bones consumption. The pets, however, are thus denied the [strongest, safest, most gentle, most effective medicine for all domestic carnivores](#).

In the UK the Raw Feeding Veterinary Society provides cover. The Society President declares that ‘dogs are omnivores’ and that:

If you find preparing fruit and veg a bit of a pain, then please note that those nice people at AMP have thought of this and done all the dirty work for you. Nature's Menu Frozen Range offers a choice of diets where raw meat and veg have been mixed and frozen for you. They are ideal for those too busy to do the whole BARF diet or for those who can, but find holidays and trips difficult.

Closer to home, the Australian veterinary schools are enthusiastic proponents of the large-scale industrial offerings. They [collaborate with the multi-national junk pet-food makers](#), brainwash vet students with junk food propaganda, but fiercely resist examination of their secret deals. Although, by administrative mistake, [one such deal was leaked](#). In Sydney, my attempts at alerting Dame Marie Bashir, Chancellor of the University and the other 22 members of the University of Sydney Senate regarding the junk food scandal affecting their university foundered in the Vice Chancellor’s office. On 21 July 2010 I delivered a box of *individually addressed* packages to the Vice Chancellor’s office. Rather than provide the packages to the Senate Members as addressed, the [Vice Chancellor’s office intercepted and disposed of the books and documents](#).

In the 150 years since Jack Spratt and Charles Cruft’s early imaginings, Dog Cake and the investments in pets have come a long way. As recently as 19 July 2018, Sydney’s Small Animal Specialist Hospital (SASH) recommended that the owners of Dozer a 4 month old terrier spend \$6,455 for a battery of further

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tests. Meanwhile, wrote the specialist vet, ‘I recommend a high quality commercial diet such as Hills or Royal Canin. Dozer should not be fed raw food for the rest of his life.’

Selected documents and videos

For people wishing for a quick overview, I suggest the following articles and videos.

The 2007 [unabridged Nexus article](#) provides a convenient overview of the subject.

[Elizabeth Farrelly writing in the Sydney Morning Herald](#) told about feeding her cats ‘exorbitant science-nosh’ and the resultant ill-health and exorbitant vet bills:

Before remortgaging the house, I did what you do. Googled, found a website called [Raw Meaty Bones](#). The message was obvious and compelling. I decided to try it. For a month, I gave them each a daily, raw chicken wing. Period. Pretty soon both cats were bouncing. No trouble peeing. No bad-breath or sore inflamed gums. Their coats became thicker and glossier. Two happy cats.

[Than and Nicola Wright writing in the University of Sydney Centre for Veterinary Education \(CVE\) Control & Therapy](#) told of their difficulties finding a vet who understood the linkage between a chronic ear condition and commercial food diet.

In light of the implications of the Wright’s article I attempted to submit a letter to the *Control & Therapy*. [Alas the attempt at achieving some exposure and some debate was stymied by the CVE](#).

Despite the [CVE and Sydney University being in thrall with the junk pet-food makers](#), Dr Richard Malik retains his job at the CVE.

Dr Malik provides an insider’s view in the 11 September 2015 edition of *The Conversation* with his article: [The convenience food industry making our pets fat](#).

So much of the noxious pet-food industry has been normalised. Three huge multi-national companies privatise the profits and the costs are socialised — purchase of the product, cost of vet services and cost of ‘welfare groups’ and municipal pounds for the unruly and untrainable dogs. In 2003 I attempted to alert the Australian Veterinary Association and State Veterinary Boards to the very real connection between unpredictable, [dangerous dogs and diet](#). Despite the human health and potential legal liability issues, no one was interested.

Several legal liability issues get an airing in my 15 June 2018 [Open Letter to the NSW Attorney General](#).

Mention of the pet-food debacle first appeared on Australian TV screens in 1993 when the [ABC Investigators](#) aired a story. In that segment Tess Abson, a Maltese terrier, can be seen undergoing radical dental surgery. Tess, apart from suffering from a foul mouth, was also suffering from anaemia, heart, liver, kidney and immune system problems. Nevertheless, with the benefit of dental surgery and a change of diet you can see her transformation four months later on [Ray Martin at Midday](#).

Maltese terrier [Wally Muir represents another junk pet-food victim](#), resurrected by dental surgery and diet change. And our [Science Death experiment](#) reveals how quickly dogs succumb to the ravages of a kibble diet.

Possible regulatory approaches to ensure the safety of pet food, including both the domestic manufacture and importation of pet food

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I believe that the current concerns arise out of the megaesophagus outbreak in police dogs and the presence of plastic particles found in dry dog 'food'. Experience tells me that these matters are but a tiny tip of an enormous iceberg. Problems have gone undetected and unresolved due to failure of regulators to enforce current regulations.

Conceptually it's impossible to *manufacture* food that is safe for pets. There have never, to my knowledge, been published controlled studies demonstrating that artificial, manufactured products are either suitable or safe for the feeding of domestic carnivores. Insofar as the veterinary profession is the highest authority on the suitability and safety of pet foods, please see how systematic failures affect the veterinary educational and regulatory mechanisms as per the Freedom of Information pages:

<http://www.rawmeatybones.com/foi.php>

Introducing more regulators and more regulations at this early stage, in my view, cannot and will not achieve acceptable outcomes — in the face of industry opposition and manipulation.

I believe that first there needs to be a full Commission of Inquiry with full judicial powers designed to gain a full understanding of the scientific, regulatory, social, economic and political issues. Based on firm foundations, subsequent regulations can then be enacted.

a.) The uptake, compliance and efficacy of the Australian Standard for the Manufacturing & Marketing of Pet Food (AS5812:2017)

AS5812:2017 is [available for \\$121.52](#). It's a creation of the [Pet Food Industry Association of Australia Inc \(PFIAA\)](#). The mostly [huge commercial enterprises, but with some smaller 'BARF' raw meat producers](#) are responsible for the widespread cruelty and suffering affecting pets, pet owners and the wider community. Besides the PFIAA the [following were involved in the development of the document](#):

Australian Quarantine and Inspection Service (Commonwealth)
Department of Agriculture, Fisheries and Forestry (Commonwealth)
Department of Primary Industries, Victoria
Pet Food Industry Association of Australia
RSPCA Australia.
Australian Veterinary Association

Zero credibility can be accorded AS5812:2017, its uptake, compliance or efficacy. There's a well-worn saying: 'Foxes in the hen house'. And it's of especial concern that Commonwealth and State Governments were involved in the drafting of the document.

b.) The labelling and nutritional requirements for domestically manufactured pet food

As per my comments above, the labelling and nutritional requirements of manufactured pet 'food' cannot meet biological imperatives.

The Australian Government should not be party to intellectually bogus concepts that lure unsuspecting consumers into the belief that harmful products are either suitable or safe for intended purpose.

I believe that existing labelling and advertising laws should be enforced to the full. If the commercial products are to remain on supermarket shelves, then warning labels *must* be attached.

Pet owners need to know that the commercial products slowly and sometimes rapidly harm pets forced to consume those products.

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If anyone wishes to promote the opposite view, then I ask: Why is it that zoos do not feed the canned and packaged products? Why do zoos feed whole carcasses or raw meaty bones?

It should also be noted that in the current un-regulated environment there's a rash of minced meat and vegetable products that carry false and misleading label claims.

c.) The management, efficacy and promotion of the AVA-PFIAA administered PetFAST tracking system

Besides foxes we can talk about Dracula in charge of the blood bank as per [Senator Stirling Griff's media release](#). The AVA-PFIAA system provides the vet/pet-food alliance with early warning of acute toxicity and bacterial contamination issues that may adversely affect their businesses.

PetFAST is the Clayton's option. It does nothing to warn of the chronic debilitating ill-health affecting *all* animals fed junk food. Nor does it warn of the acute end-stage diseases following on from a lifetime of junk food induced suffering — for instance the heart, liver, kidney, immune system failures, diabetes and cancer.

d) The feasibility of an independent body to regulate pet food standards, or an extension of Food Standards Australia New Zealand's remit

I believe that premature uptake of new or extension of existing standards should be avoided. I believe that new regulations and likely new regulatory bodies are both feasible and necessary, but only after rigorous investigation of all the scientific, economic, legal, educational, social and political issues.

e.) The voluntary and/or mandatory recall framework of pet food products

All processed pet foods, whether directly or indirectly, injure the health of animals. From time to time identifiable additional hazards arise — for instance chemical or bacterial contamination and formulation deficiencies and excesses — that give rise to outbreaks of acute disease and death.

The manufacturers need to be held accountable for both the long term chronic diseases arising from their products and the sporadic outbreaks of acute disease.

I believe that Australian Governments, both federal and state, should be and probably are legally liable for the sale and promotion of known harmful products under the guise that those products are suitable, safe and enjoy official/Government endorsement.

f.) The interaction of state, territory and federal legislation

Only by establishing a major Commission of Inquiry, will it be possible to draw together all the disparate pieces of legislation affecting consumer safety, animal cruelty, vet education, dangerous dog legislation, labelling, advertising and etc. This [summary](#) only partly deals with the various acts and regulations.

g.) Comparisons with international approaches to the regulation of pet food

Comparisons are of little or no value since no other country has properly dealt with the abomination of the pet-food scourge. Effectively, in all other countries the 'Dracula in the blood bank', 'foxes in the hen house' syndrome prevails. The global veterinary profession, ultimate authority and therefore regulator of pet food, is in lockstep with the processed pet-food makers. Australia must, as a matter of vital national interest, act to curb the activities of the multi-national pet-food makers and their vet and animal welfare collaborators.

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h.) Any other related matters

At the very core of the issues under review, the dead hand of the processed pet-food industry has suppressed and subverted the science we, as a society, depend upon.

Since first blowing the whistle in 1991, I say that there's an effective veterinary profession ban on researching and publishing of information adverse to the pet-food makers. When, in 1993, [Professor Colin Harvey proposed a study](#) to make the simple comparison between the oral hygiene of research colony dogs fed either dry kibble or raw meaty bones, he was blocked. Simultaneously, of course, there are immense company and vet research efforts devoted to junk pet-food product improvement and marketing.

Since pet carnivores, at the extreme end of the nutritional spectrum, suffer serious health issues as a result of a junk food diet, this very fact can inform vast new research fields of benefit to veterinary and human medical and nutritional research.

In the lay media self-censorship is the general rule. In August 2001 *The Australian* and *Sun Herald* newspapers prepared articles to coincide with the launch of *Raw Meaty Bones*. On the eve of publication both pulled the articles. In the UK, *Reader's Digest* and the *Weekend Independent* spent months researching the junk pet-food story. Both publications pulled their stories on the eve of publication.

Conclusion

The 150 years junk pet-food experiment has imposed relentless cruelty on pet carnivores, defrauded consumers and placed undue burdens on the wider society and natural environment. I believe that the experiment constitutes white collar crime on a global scale.

The main perpetrators, the multi-national corporations and their veterinary and animal charity collaborators, should be subjected to searching investigation by a full scale commission of inquiry with full judicial powers.

On the evidence, I believe it would be inappropriate for wrongdoers to be accorded 'stakeholder' status and thus insider opportunity to either influence or, as is currently the case, control policy. Independent scientists and administrators will be needed to resolve the endemic, culturally conditioned malfeasance. Long term planning for wise management over many years will be essential. South Africa emerged from apartheid aided by its Truth and Reconciliation Commission. A similar concept may be of value in rehabilitating those involved in the \$multi-billion pet-food scandal.

Despite the flood of disinformation, obfuscation and double-speak, I believe that the Senate Committee can identify key issues and initiate measures leading to a renaissance for pets, pet owners and the wider Australian and global communities.

I wish you well in your endeavours and I stand ready to assist.

Signed,

Tom Lonsdale
25 July 2018

