

Tom Lonsdale BVetMed, MRCVS Supplementary Submission

Following on the Committee's 28, 29 August 2018 Public Hearings I would like to provide further comment by way of explanation or expansion on some points arising.



\$multi-billion global conspiracy on display — Hill's, vets and welfare groups.

Standard fare — stretching and inverting the truth.



Self-regulation

It's a well-worn truism that power has a tendency to corrupt and absolute power corrupts absolutely. Regarding the currently respected authorities who pronounce on the suitability and safety of pet foods, there are three all-powerful, self-regulating bodies:

1. The pet food industry represented by the Pet Food Industry Association of Australia (PFIAA) a self-funded, self-regulating body employing ½ of one full-time executive, Dr Duncan Hall, a long-time employee of the Mars Corporation.
2. The veterinary profession upon which each Australian State or Territory has conferred, by act of Parliament, self-regulatory status.
3. The RSPCA is an independent self-regulating charity that works with governments, both federal and state, as an arbiter of the Five Freedoms for animals:
 - Freedom from Hunger and Thirst.
 - Freedom from Discomfort.
 - Freedom from Pain, Injury or Disease.
 - Freedom to Express Normal Behaviour.
 - Freedom from Fear and Distress.

It is no secret that the three self-regulatory bodies actively collaborate, cross-promote and defend each other's interests — whether locally, nationally or internationally. Three large multi-national corporations, Mars, Nestlé and Colgate-Palmolive derive major financial benefit, but also provide 'sponsorship' to veterinary schools, associations and RSPCA and other charitable organisations. It's my contention that far from deserving our respect, that this three party alliance amounts to a massive international white collar criminal conspiracy against the interests of pets, people and the planet.

Despite the conceit of the Five Freedoms, I believe that there is overwhelming evidence confirming that domestic carnivores condemned to a lifetime consuming processed food:

- Suffer hunger for essential natural foodstuffs and are simultaneously deprived of essential use of powerful jaws and specialised teeth.
- Suffer persistent discomfort, for instance arising from gum disease, skin disease, gastro-intestinal disease and similar morbidities, which are frequently identified in retrospect when animals are switched from a processed food diet to a whole carcass/raw meaty bones diet.
- Suffer chronic pain and disease most often leading to acute disease and premature death.
- Suffer restrictions on normal foraging and eating behaviour. In many instances animals become addicted to the harmful processed 'foods'.
- Suffer anxiety and distress that can often be detected in hindsight when animals have a diet change from processed to natural food.

Prompt and timely recall

With the interests of pets and pet owners being the primary justification for product recalls, it is difficult or impossible to see how processed pet foods can appear on the shelf without triggering an instant recall.

The Mars Inc. Advance Dermocare recall was triggered due to a small cluster of dogs suffering a rare condition, megaesophagus, during a relatively short time frame. Otherwise, nationwide, a few cases were widely distributed. At the time of writing, whilst a correlation has been made between the reported cases, there is still no toxicological evidence confirming the role of the Mars product.

Clearly, then, there is *no* published information on the link between Mars products and megaesophagus. But nevertheless a recall was quite quickly triggered. There was no need to wait for the published evidence.

By contrast the veterinary and supporting human medical literature contains plentiful scientific evidence of the widespread devastating effects of a highly processed diet, periodontal disease and obesity affecting millions of pet dogs and cats. Increasingly researchers identify inflammation as a key factor triggering a plethora of systemic diseases — and that inflammation derives from highly processed diets, gum disease and obesity.

Regarding gum disease leading to other diseases the [15 July 2002 *Veterinary Times* Mars Corporation feature states](#):

Dental problems are known to increase with age and are increasingly being linked to vital organ disease — most notably kidneys and liver. . . . The major health implications of gum disease has been one of the major motivating factors for vets at the Waltham Centre for Pet Nutrition in their development of new Pedigree Daily DentaStix, “If we can improve the overall oral hygiene of dogs, we hope to improve their long-term health prospects.”

However 15 years previously in 1987, [Mars vet Dr Peter Higgins, in a rare moment](#) of candour admitted to the widespread diet fallacies:

Much has been said and written about nutrition of small animals, unfortunately, most of what is said and written is based on fallacy rather than fact and anecdotes rather than science. This is especially true in the area of diet and dental disease.

Dr Higgins invoked the feeding of raw bones and concluded:

It is ironic that preventative dentistry towards the end of the 20th century is based on what dogs and cats found in nature thousands of years ago.

Processed food diets for humans are known to be associated with numerous disease entities. Clearly processed diets are either directly or indirectly implicated in virtually all disease states in domestic pets forced to consume those diets. See *Raw Meaty Bones: Promote Health* for examples.

[Many pet owner submissions](#) to this Inquiry offer immediate, compelling first person accounts of the relationship between processed diets, disease and early death. The industrial products giving rise to those widespread diseases and deaths should have been recalled.

Pet-food industry influence and control

On 29 August 2018 at the Senate Committee Hearing Senator Sterle asked me to explain what I meant by the veterinary profession being ‘controlled’ by the junk pet-food industry. In reply I cited the 1993 instance of [Professor Colin Harvey being prevented from performing a simple experiment](#) to compare oral health outcomes of beagles housed in a breeding colony when fed either commercial food or raw meaty bones.

Although prohibited from conducting a simple, low cost experiment to demonstrate a simple preventative strategy for periodontal disease, Professor Harvey continued to perform elaborate, costly research. In 2018 he received the prestigious 2018 World Small Animal Veterinary Association Award for Scientific Achievement:

Until his retirement in 2013, Harvey was Professor of Surgery and Dentistry at the University of Pennsylvania, a position he held for 33 years. During this time, he introduced a full range of oral and maxillofacial surgical procedures into clinical, teaching and research activities.

His interest in the relationship between oral health and systemic health in companion animals led to collaborative work that resulted in confirmation of the epidemiological findings in humans that worsening periodontal disease is associated with distant organ (kidney, liver, heart) pathology.

Important research Professor Harvey was permitted to perform serves to corroborate evidence presented in *Raw Meaty Bones*. However, in the hands of the veterinary profession, the Harvey findings serve a more cynical purpose. Put bluntly, scaremongering coupled with blatant over-servicing is the name of the game. The veterinary profession makes [\\$millions annually performing dental examinations](#), elaborate treatments and making sales of artificial dental diets and products. Pet owners are groomed by vets to fear the consequences of periodontal disease but then to place trust in expensive [unnecessary veterinary treatments and impractical or impossible tooth brushing](#).

In the event that Professor Harvey had been permitted to perform his study on the diet and oral disease nexus, he would then have encountered the peer review process which [Richard Horton the editor of the *Lancet*, labelled](#): ‘Biased, unjust, unaccountable, incomplete, easily fixed, often insulting, usually ignorant, occasionally foolish and frequently wrong.’

Whilst the veterinary journals are able to censor and suppress information on feeding animals according to fundamental evolutionary determinants, they are simultaneously able to publish scaremongering, unbalanced papers on the over-stated risks of feeding animals fresh food. And since the vets, and thus their paymasters the pet-food companies, control the publications they can and do publish attack pieces.

In 2005 the British Veterinary Association, the British Small Animal Veterinary Association and the Pet Food Manufacturers Association [attacked the Raw Meaty Bones Lobby](#). A rebuttal of their spurious claims can be found [here](#).

Dr Joanne Sillince, Managing Director of Pets Australia advocates for the pet-food industry and addressed the Committee on 28 August 2018. In 2004 Dr Sillince was President of the Australian Veterinary Association at the time that I was [summarily expelled from the Association for daring to air anti pet-food sentiments](#).

Dr Duncan Hall addressed the Committee on 28 August 2018 on behalf of the Pet Food Industry Association of Australia. His efforts on behalf of the Mars Corporation can be traced back at least to [1992 when he sought to hose down concerns](#) about the pandemic of periodontal disease arising from processed diets.

Dr Linda Fleeman, Adviser on Pet Food Issues, Australian Veterinary Association on 28 August 2018 informed the Committee: 'I also don't work for pet food companies or anything like that. I'm not associated with the industry in that regard.' However the [Brisbane Courier-Mail reported](#) that in 2003 her salary was paid by Nestlé. And in 2018 she headed an [advertorial for Nestlé artificial products](#).

Dr Andrew Spanner addressed the Committee on 28 August 2018. At his [website he displays junk pet food and advises](#):

- Dogs and humans are both omnivores [sic], and our diets are broadly similar, but there are a few important differences.
- A complete, balanced puppy or adult dog food gives the peace of mind of knowing all the major nutrients are included.
- A good manufacturer will follow the latest science and understanding of the requirements of dogs, and engage in research, development and testing. You are paying for their expertise.
- We recommend either Hills [Colgate] or Royal Canin [Mars] as companies you can put your trust in. These high-quality diets require no extra supplements; in fact, adding supplements (especially calcium) can unbalance the diet and be dangerous
- Are you struggling to get your puppy onto one of these diets? [Read our guide to getting puppies to eat dry kibble](#).



Dr Sue Foster informed the Committee on 28 August 2018: ‘I am a veterinary specialist and a volunteer—unpaid—consultant to the Australian Veterinary Association (AVA) on their petFAST program for adverse events. I’m not associated with the pet food industry.’ Dr Foster is an academic working at Murdoch Veterinary School. [Murdoch is deeply involved with Hill’s and Royal Canin junk pet-food companies.](#) The [AVA is deeply involved with Hill’s and Royal Canin junk pet-food companies.](#)

Associate Professor Caroline Mansfield addressed the Committee on 29 August 2018. Professor Mansfield works at the University of Melbourne and previously worked at Murdoch. [Both veterinary schools have close involvement with the junk pet-food makers.](#) Professor Mansfield is past president of the Australian College of Veterinary Scientists, which organisation had or has close ties with junk pet-food makers. It’s alleged that Hill’s did and perhaps still does pay her salary at the University of Melbourne.

Clearly the three giant junk pet-food makers enjoy special relationships, built up over many years, with leading veterinary institutions. The full extent of the companies’ influence and control should be opened up to public scrutiny.

Impacts on human health

When human health is adversely affected by pet food, for instance outbreaks of *Salmonella*, then it tends to make the headlines. Raw chicken for pet consumption, just like raw chicken for human consumption, frequently harbours *Salmonella*. However folks tend not to tuck into the chicken wings, uncooked. But it’s a different matter when dried kibble becomes contaminated and the [resultant product is transported to far flung locations](#) as was the case when Mars junk food became contaminated.

From my research, I believe other aspects of processed pet food and the promotion of same represent much greater human health hazards.

The junk pet-food makers relentlessly promote dog ownership — not as modified wolves armed with 42 teeth for ripping flesh and crushing bone and wolf-like predator characteristics — but as docile, amenable, friendly, trouble-free, furry friends. Lulled into a false sense of security and with no efforts made to educate the community about the needs of modified wolves the scene is set for bad outcomes. And this is made the worse by modified wolves (dogs) being maintained on junk food that gives rise to chronic disease, discomfort and irascibility. [Senate submission # 69](#) makes the point. And back in 1987 Dr Roger Mugford, a dog behaviour expert employed by Mars Inc. [published his early findings on the effects of diet on dog aggression.](#)

Little extra diet implicating evidence has been added to the literature since 1987 — not because dog bites are infrequent. No, it’s because the junk pet-food industry and collaborators control what is permissible and what is not permissible to be researched and published. For the record the [ANZ Journal of Public Health reported](#) that during the period 2001- 2013 an average 2061 persons were hospitalised in Australia each year as a result of dog bite injuries. The authors state:

Dog bites have long been identified as a potential source of serious injury to humans,¹ and injuries due to dog bites are a largely unrecognised and growing public health problem. The public health implications of dog bites are substantial, and

verifying the extent of the problem is important.² The serious health-related consequences of injuries sustained due to dog bites include open wounds, cellulitis, and fractures leading to temporary or permanent disability, mental trauma, anxiety and premature mortality. The economic consequences include use of medical resources, lost productivity of victims and their carers, and time and effort expended by the wide range of personnel involved in apprehending and dealing with the offending animal including court cases involving the victim, the victim's family and the owner of the offending dog. The social consequences include inter-personal disputes and community conflict.

Set against the chilling statistics the junk pet-food/vet collaborators claim pet ownership confers human health benefits. I agree that in the right environment and for those who understand animal needs and can afford the costs, there are benefits. Unfortunately the debate is owned and controlled by the junk pet-food industry/vet/welfare groups. And the source of much of their information? As you may imagine, [Mars Inc funded the Anthrozoology Institute at Southampton University headed by a Mars former employee](#). That Institute is now housed at Bristol University Veterinary School in the UK.

In 2003 I alerted Federal Parliamentarians to the [AVA President, Dr Joanne Sillince's human health claims](#) and the counter claims made in the *Medical Journal of Australia*. Now in 2018, I hope, the matter can be further explored and resolved.

Perhaps the biggest junk pet-food impact on human health and welfare arises from what is *not* done and *cannot* be done under the present junk pet-food controlled circumstances. I refer to the paucity of veterinary and medical research utilising the unique characteristics of carnivores regarding their dentition and susceptibility to periodontal disease.

Dogs live an estimated average fifteen years compared with humans, say, who live approximately 75 years — a fivefold difference. A fifteen kilo dog's mouth is approximately twice the size of a 75 kilo human — a tenfold difference. Couple these facts together and we have [excellent periodontal disease subjects](#) for plotting and analysing the health consequences which are already known to involve [heart attacks, stroke, diabetes and cancer](#).

Conclusion

By way of context I believe we need to take note of the estimated annual revenue, for all products both pet food and other lines, of the big three processed pet-food makers:

[Nestlé US\\$90billion](#)

[Mars US\\$33 billion](#)

[Colgate-Palmolive US\\$15.45 Billion](#)

As a percentage of global sales the [AUD\\$4.2 billion Australian pet food market](#) is relatively small. However, Australian Government scrutiny has potential to impact not only the Australian market but also the wider global market.

Nestlé made one and Mars made two submissions. It's instructive to note that Hill's (Colgate-Palmolive) did not make a submission. However, the Australian Veterinary Association,

RSPCA and Cats Protection Society, all significant recipients of Hill's largesse, did make submissions.

The [AVA in its submission](#) states: 'The AVA strongly supports the continued collaboration between the PFIAA, AVA, and RSPCA.'

The [PFIAA states in its submission](#): 'The PFIAA welcomes this inquiry into pet food safety to consider current regulatory arrangements and oversight and to consider opportunities to enhance the safety and integrity of domestically sold commercial pet foods in Australia.'

[Mars Petcare states in its submission](#): 'Mars Petcare Australia, a leading pet-food manufacturer here in Australia, welcomes the inquiry into regulatory approaches to ensure the safety of pet food, and the opportunity to contribute.'

[Royal Canin, division of Mars Inc., state in their submission](#): 'As a global leader in pet health nutrition, with experience in different countries around the world, we welcome the opportunity to strengthen the regulation of the pet food industry in Australia so we can continue to improve the health and wellbeing of cats and dogs. Pet owners expect the highest quality of nutrition for their pets and we understand their need to feel confident in the manufacturing and marketing of all pet food in Australia.'

[Mr Barry O'Sullivan, General Manager, Mars Petcare Australia](#) informed the Committee on 29 August 2018:

We welcome this inquiry. Between me and my colleague Dr Roger Bektash, we have 60 years experience working with Mars. We thank you for the opportunity to contribute today. As one of Australia's largest pet food manufacturers, millions of Australians put the health of their pets in our hands. This responsibility is the cornerstone of our business and guides the decisions we make. The health of Australian pets is our No. 1 priority. Nowhere is this more evident than in the quality and safety standards that we have as a family owned business. As a global manufacturer, our standards meet or exceed the most stringent standards in the world. Here I refer to the standards in particular in the United States and the European Union. In fact, the family that own this business insist on that, and they are accredited in every market around the world through a third party, Lloyd's Register Quality Assurance.

So we must ask: Why the new-found enthusiasm for improved regulations? What's in it for the pet-food industry/vet/RSPCA alliance?

The [Inquiry Terms of Reference](#) *a* to *g* relate to regulatory and compliance issues that should present few or no difficulties for the alliance.

However *h. any other related matters* widens the scope and I believe enables the Committee to investigate and report on the substantive issues affecting pets, pet owners and the wider society. I believe that the pet-food industry/veterinary/animal welfare alliance has engaged in systemic abuse of power over many years. A Royal Commission of Inquiry is now warranted.

Signed,
Tom Lonsdale BVetMed, MRCVS

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of Science Diet helps
Hill's support the

RSPCA 

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