

Correspondence with officers of the Department of Agriculture commencing 5 November 2019

Legend:

Text in orange 5 November 2019 from Freedom of Information Team providing FOI response regarding composition, agenda and minutes of the Pet Food Review Working Group.

Text in in green from Customer Contact Group

Text in red from Principal Veterinary Officer and departmental officers associated with the Pet Food Review Working Group

Text in black from Tom Lonsdale

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Date: 24/06/20

Response By E-mail (Leigh Valentine) (24/06/2020 05.36 PM)

Dear Dr Lonsdale

All the responses to your correspondence have been reviewed by a senior officer at the level of Assistant Secretary (Narelle Clegg).

The Minister received the three letters you have sent to him that included the information you have provided to us in your emails.

Acts and regulations the department administers can be found on department's website - <https://www.agriculture.gov.au/> More details about acts and regulations covering ministers may be found on the parliamentary website [here](#).

Regards

Leigh Valentine

Client Contact Group | Biosecurity Operations

Phone: 1800 900 090

Department of Agriculture, Water and the Environment

18 Marcus Clarke Street, Canberra ACT 2601 Australia

GPO Box 858 Canberra ACT 2601 Australia

awe.gov.au

=====
=====
Date: 12/06/20

Customer By Service Email (Tom Lonsdale) (12/06/2020 01.01 PM)

Dear Neeraj,

Please see below message of 19 May 2020.

I look forward to your early reply.

Best wishes,
Tom

Date: 19/05/20

To: "CCG" <ccg@mailsy.custhelp.com>

From: Tom Lonsdale <tom@rawmeatybones.com>

Subject: Re: LONSDALE - Complaint - Client [Request: 200401-000444] [Incident: 200514-000499]

Cc:

Dear Neeraj,

Thank you for your message advising that the Client Contact Group endorses the 23/3/2020 response of the Principal Veterinary Officer.

Given the magnitude of the issues raised about the Senior Veterinary Officer and the Pet Food Review Working Group I believe that an officer, more senior than the Principal Veterinary Officer, should have reviewed the files and provided answers.

Please advise if a senior officer has reviewed the files and if so the name and position of that officer.

Is the Minister aware of my complaint and the questions raised and the Client Contact Group response?

Please advise the acts and regulations governing the functions of the Department of Agriculture.

Please advise the acts and regulations specifying the functions and responsibilities of the Minister of Agriculture.

With thanks,

Tom Lonsdale

From: "CCG"

<ccg@mailsy.custhelp.com>

Reply-To: "CCG"

<ccg@mailsy.custhelp.com>

To: tom@rawmeatybones.com

Date: Fri, 15 May 2020 14:02:57 +1000 (AEST)

Subject: LONSDALE - Complaint - Client [Request: 200401-000444] [Incident: 200514-000499]

You recently requested personal assistance from our Support Centre. Below is a summary of your request and our response. Thank you for allowing us to be of service to you.

Subject

LONSDALE - Complaint - Client [Request: 200401-000444]

Response By E-mail (Neeraj) (15/05/2020 02.02 PM)

Good Afternoon Tom,

A final response had been provide in relation to this feedback on 23/3/2020.

Thank you

14/05/20

To: "CCG" <ccg@mailsy.custhelp.com>
From: Tom Lonsdale <tom@rawmeatybones.com>
Subject: Re: LONSDALE - Complaint - Client [Request: 200401-000444]
Cc:

Hi,

Please advise progress.

With thanks,

Tom Lonsdale

3/04/20

To: "CCG" <ccg@mailsy.custhelp.com>
From: Tom Lonsdale <tom@rawmeatybones.com>
Subject: Re: LONSDALE - Complaint - Client [Request: 200401-000444]
Cc:

Hi,

Thank you for your confirmatory email.

I shall be pleased to provide clarification and additional information as you may require.

For a short introduction to the core issues, please see my 2020 Royal College of Veterinary Surgeons manifesto and supporting video. <http://www.rawmeatybones.com/RCVS/RCVS2020.php>

Best wishes,

Tom Lonsdale

At 11:11 AM 3/04/2020, CCG wrote:

We are continuing to work on your issue. To update your question with additional information, please reply to this email.

Subject

LONSDALE - Complaint - Client

Response By E-mail (Kelly) (03/04/2020 11.11 AM)

Dear Tom

Thank you for providing feedback to the Department of Agriculture, Water and the Environment. Feedback is vital in helping us understand your views and experiences with the department.

If you have requested a response to your feedback we aim to respond within 10 working days. If the matter

is complex, it may take longer in which case an interim response will be provided.

Your reference number is: 200401-000444

If you wish to follow up on your feedback, reply directly to this email, or telephone the department's dedicated feedback number on +61 2 6272 3084, please quote this reference number in any further correspondence.

Regards

Client Contact Group | Biosecurity Operations

Phone: 1800 900 090

Department of Agriculture, Water and the Environment

18 Marcus Clarke Street, Canberra ACT 2601 Australia

GPO Box 858 Canberra ACT 2601 Australia

awe.gov.au

Customer By Service Email (Tom Lonsdale) (02/04/2020 02.22 PM)

2/04/20

To: "CCG" <ccg@mailsy.custhelp.com>

From: Tom Lonsdale <tom@rawmeatybones.com>

Subject: LONSDALE - Complaint - Client [Incident: 200401-000444]

Cc:

Dear Sir or Madam,

Please find email chain below and attached consultants' reports in support of my complaint against the Pet Food Review Working Group.

I believe that the documents and hypertext links are self-explanatory and describe an unfolding and serious situation.

I believe that the Pet Food Review Working Group and its officers have failed to meet the required standards as listed in the [Client Service Charter](#).

Several questions posed in the emails below remain unanswered.

Rather than acknowledge and investigate allegations dating from 1991 of widespread cruelty and consumer fraud impacting the work of the Working Group; those allegations have been summarily ignored.

Rather than being part of the solution, I believe that the Working Group has become very much part of the problem.

Please investigate and advise.

With thanks.

Yours faithfully,

Tom Lonsdale, veterinarian

Bligh Park Pet Health Centre
48 Rifle Range Road
Bligh Park
NSW 2756

Tel: 02 4577 7061
Mob: 0437 292 800

From: "CCG"
<ccg@mailsy.custhelp.com>
To: tom@rawmeatybones.com
Subject: LONSDALE - Complaint - Client [Incident: 200401-000444]

We are continuing to work on your issue. To update your question with additional information, please reply to this email.

Subject

LONSDALE - Complaint - Client

Response By E-mail (Faye) (01/04/2020 04.58 PM)

Dear Tom

Thank you for providing feedback to the Department of Agriculture, Water and the Environment . Feedback is vital in helping us understand your views and experiences with the department.

In order to respond to your feedback accurately, could you please provide us with further information? Please respond directly to this email with more information such as:

- the supporting information regarding your complaint

If you have requested a response to your feedback we aim to respond within 10 working days of the date you provide complete details of this matter you would like us to look into. If the matter is complex, it may take longer in which case an interim response will be provided.

Your reference number is: 200401-000444

If you wish to follow up on your feedback, reply directly to this email, or telephone the department's dedicated feedback number on +61 2 6272 3084, please quote this reference number in any further correspondence.

Regards
Faye
Client Contact Group | Biosecurity Operations

Phone: 1800 900 090

Department of Agriculture, Water and the Environment

18 Marcus Clarke Street, Canberra ACT 2601 Australia
GPO Box 858 Canberra ACT 2601 Australia

awe.gov.au

Customer By Service Email (Department of Agriculture) (01/04/2020 12.11 PM)

23/03/20

From: "Thomson, Sally" <Sally.Thomson@awe.gov.au>
To: Tom Lonsdale <tom@rawmeatybones.com>
Subject: RE: Pet-food industry -- regulatory capture [SEC=UNCLASSIFIED]

Dear Tom

Your email has been received and noted

Regards

Sally

Sally Thomson

Principal Veterinary Officer | Animal Disease Preparedness and Response |
Animal Health Policy Branch | Animal Division
Phone: 02 6272 5316
E: sally.thomson@awe.gov.au
Department of Agriculture, Water and the Environment
18 Marcus Clarke St
GPO Box 858 Canberra City ACT 2601

From: Tom Lonsdale [<mailto:tom@rawmeatybones.com>]
Sent: Wednesday, 26 February 2020 3:43 PM
To: Thomson, Sally <Sally.Thomson@agriculture.gov.au>
Cc: mark.booth@foodstandards.gov.au; Clegg, Narelle <Narelle.Clegg@agriculture.gov.au>;
cvo.victoria@agriculture.vic.gov.au; neville.matthew@accg.gov.au; Nada.Anderson@accg.gov.au;
enquiries@health.gov.au; cnsadmin@industry.gov.au; Scott.crerar@foodstandards.gov.au;
nsw.agriculture@dpi.nsw.gov.au; info@safefood.qld.gov.au; Johar, Kiran <Kiran.Johar@agriculture.gov.au>;
sharon@ <iplegal.com.au> sharon@iplegal.com.au>
Subject: Pet-food industry -- regulatory capture [SEC=UNCLASSIFIED]

Dear Sally,

Thank you for your message and consultants' reports.

Regulatory capture

[Wikipedia defines regulatory capture as:](#)

'A corruption of authority that occurs when a political entity, policymaker, or regulatory agency is co-opted to serve the commercial, ideological, or political interests of a minor constituency, such as a particular geographic area, industry, profession, or ideological group. When regulatory capture occurs, a special interest is prioritized over the general interests of the public, leading to a net loss for society.'

and

'Businesses have an incentive to control anything that has power over them, including institutions from the media, academia and popular culture, thus they will try to capture them as well. This phenomenon is called "deep capture".'

That the pet-food manufacturers, establishment vets and RSPCA have prominent roles on the Working Group does, I believe, demonstrate a level of 'regulatory capture' that should be a concern to anyone interested in the welfare of pets, pet owners and the wider community.

For the avoidance of doubt, I feel obliged to restate the allegations against the manufacturers, veterinary establishment and RSPCA.

By virtue of the ubiquitous 'dry and tinned pet food' to which you refer, there is a perpetual state of unnoticed, unrelieved devastation of pet health. All pets fed 'dry and tinned pet food' endure suboptimal health. Most pets suffer devastating periodontal disease (gum disease) and multiple sequelae. A majority suffer intractable carbohydrate induced obesity. Feline diabetes, urological syndrome and immune mediated conditions run at epidemic levels. By normalising these and many other diseases, the multi-national manufacturers Mars, Nestle and Colgate are freed to make massive guaranteed profits.

The veterinary profession is supplied an endless procession of sick pets and guaranteed income. The profession, brainwashed in veterinary schools beholden to the manufacturers, is then taught to engage in massive over-servicing of clients -- when simply advising the cessation of the junk 'dry and tinned food' is generally all that's necessary -- but which would significantly affect the junk pet-food/veterinary bubble economy.

The RSPCA, beholden to Colgate-Palmolive, is ensured a plentiful supply of unwanted, sick and elderly pets and thus a plentiful supply of bequests and donations -- on the proviso that the widespread 'dry and tinned food' induced cruelty remains a forbidden subject out of sight out of mind.

Please be aware that cruelty on an industrial scale should incur criminal prosecutions brought by the RSPCA on an industrial scale. But the RSPCA, the appointed animal welfare regulator, has been 'captured' by the processed pet-food manufacturers. It's the RSPCA that first needs to be prosecuted for aiding and abetting widespread cruelty to animals.

Australians spend approximately \$4 billion on processed pet food and \$12 billion on veterinary services annually. However a greater proportion is fraudulently obtained by virtue of false and misleading advertising depicting 'dry and tinned food' as suitable and safe.

The veterinary profession has clearly been swept up in this criminal enterprise and now we are informed that the Working Group, including the ACCC, believes that 'dry and tinned food' will continue to be made. Regardless of the cruelty; regardless of the fraudulent promotion and sale of inherently harmful products; the Working Group abandons objective analysis and sides with the manufacturers, vets and RSPCA.

You state: 'It is also important to give consumers a choice while providing them with all the information necessary to enable them to make informed decisions on what they feed their pets.' However, in all of our correspondence to date you have either declined to provide the information sought or attempted to provide the manufacturers, vets and RSPCA with a cover-up. Under such circumstances it appears that the Working Group does not want owners to 'make informed decisions on what they feed their pets'. It appears that you want owners to suffer a false sense of security that 'dry and tinned food' is suitable and safe; that inert string and coloured plastic and otherwise mysterious and hard to resolve aberrant adverse events are the only concerns of relevance.

The massive nation wide (international) mass poisoning of pets by junk pet-food makers has depended on the nation wide regulatory capture of the designated regulatory agencies. The RSPCA is paid hush money by Colgate. The seven Australian Veterinary Schools are paid hush money by Colgate and Mars. The relevant State Government and Federal Government regulatory agencies are staffed in the front line by desk-bound vets. Vets who, on the evidence, appear to have little understanding or concern for Australia's pet carnivores and who kowtow to the incompetent and mostly corrupt veterinary establishment. The media and advertising regulators lack technical knowledge and simply follow the lead of the veterinary regulators. Fear is the common denominator. Hans Christian Andersen's *Emperor's New Clothes* provides an excellent analogy for

the regulatory capture and abandonment of common sense in the face of the processed pet-food/veterinary/RSPCA alliance hiding in plain sight -- paid for and controlled by Mars, Nestle and Colgate-Palmolive.

Pet Food Regulation Report

In the Executive Summary Sharon Givoni Consulting wrote:

'Australian Consumer Laws do provide some form of legal recourse where section 3 of the Australian Consumer Laws, pet food may be considered as a consumer good, and the pet owner may be considered as a consumer. Therefore, if the manufacturer of pet food makes false or misleading statements or engages in misleading or deceptive conduct, then the pet food owner may take action against the pet food manufacturer under that consumer law.

To date, the current laws are not enough to protect pets and pet owners from unscrupulous pet food manufacturers. The current regulatory system does not encourage reporting of pet food-related incidents by pet owners.'

There can be no doubt that Mars, Nestle and Colgate are unscrupulous and make 'false or misleading statements or engages in misleading or deceptive conduct'. I note however that various Australian government agencies, including the ACCC, sit on your Working Group and have a harmonious relationship with Mars, Nestle and Colgate. To my knowledge none of the government agencies, including the ACCC, have investigated and prosecuted Mars, Nestle or Colgate for their false and misleading advertising.

Commenting on the Senate Inquiry Sharon Givoni Consulting pointed to the fatal flaw in both the Senate Inquiry and the current Working Group.

'In our view, the Inquiry is very comprehensive and well-researched but the Inquiry does not look into what the dietary recommendations are for pets as this is out of its scope.'

Lacking basic dietary recommendations any discussion must be fundamentally flawed and perforce float in a vacuum without an agreed reference point. Of course this nebulous state of affairs suits the pet-food manufacturers/vets/RSPCA. Otherwise, however, it permits uncertainty or more serious egregious error where junk 'dry and tinned food' is considered acceptable and made available for sale to millions of pet owners.

Under the heading The Reasons Behind the Inquiry Sharon Givoni Consulting wrote:

'The Inquiry stemmed from several recent incidents where the safety of pet food was compromised and resulted in a number of medical issues for pets. These included megaesophagus, incidents relating to thiamine deficiency, irradiation, kidney disease, and the chemical and physical contamination of pet foods with foreign objects. Further, there were also chemical contamination and toxicity concerns where plastic had been found in pet food.

The PFIAA is a key player in the pet food industry. PFIAA has been operating in Australia since 1972 and has welcomed the Senate Inquiry into pet foods.

In their media statement dated 21 June 2018, Duncan Hall, the Executive Office of PFIAA stated: *"We consider that the proposal for the parliamentary enquiry and the leadership shown by both the Department of Agriculture and Water Resources and Senator Griff, is timely, appropriate and welcome"*

On 29 August 2018, all States and Territories confirmed that a review was needed to address these legitimate concerns.'

As confirmed in the Mansfield report the public concerns arose out of relatively minor, sporadic and aberrant diet-related outcomes. Outcomes the likes of which frequently go undetected and the causal factors remain difficult or impossible to identify. Consequently we should not be surprised that giant multinationals accused of widespread criminal misconduct in respect to their core business practices are pleased when the Government narrow focus is on relatively minor matters of quality control -- the Government Working Group deliberately, actively ignoring the 'dry and tinned food' wrought cruelty and fraud.

Insofar as an inquiry was inevitable, the manufacturers welcomed the same, in the full knowledge that they and their veterinary allies would have seats at the regulatory table. By shaping the inevitable and innocuous

regulations the manufacturers gain early notification and also assist in increasing the barriers to entry for other would be pet-food manufacturer competitors. With the government departments, vets and RSPCA lending an apparent veneer of integrity and respectability, the manufacturers gain much from their long standing influence peddling and regulatory capture. Complacent regulators engage in a sham and the accused criminal conspirators are provided with government endorsed cover.

Pet Food Health and Safety Report

Professor Mansfield was the lead consultant to the Working Group. Whilst much is unknown about her involvement with the pet-food manufacturers her opinions are available in this [video featuring 14 December 2019 Radio National interview](#). Pet owners commenting on the video on You Tube were quick to question Professor Mansfield's credibility and judgement regarding appropriate diets for dogs and cats.

The consultants state:

'The report has been prepared independently from the ACCC, PFIAA or the AVA, but the second draft has been amended following comments from these bodies.'

It would be helpful to know what those amendments are and whether they provide cover for the ACCC persistent refusal to investigate and prosecute the false and misleading pet-food advertising; or served to assist the PFIAA and AVA in their ongoing commercial scams.

The consultants were asked to provide a collation of pet-food safety events as per:

'Collate information on all pet food safety events that have occurred since 2012, describe the cause and source of information as well as the number of animals affected, identify any issues; in particular whether the incident would have been averted if the pet food complied with the Australian Standard for manufacturing and marketing of pet food (AS 5812:2017) and report on the effectiveness of the response to these events.'

In fact the consultants could name only a handful of aberrant events as listed below. This is not the place for a detailed analysis of the twelve nominated instances spread over six years. Notwithstanding that some of the instances resulted in the deaths of pets, overall, the number of instances and significance of those instances are trivial when compared with the known daily tally of chronic, acute and fatal diseases arising from processed products.

I do however wish to make passing comment on the twelve listed items as quoted verbatim from the report:

1.)

'Thiamine deficiency

According to the AVA response to this report, thiamine deficiency due to sulphite-treated pet meat is a common Australian adverse pet food event reported to PetFAST.'

2.)

'Woolworths Select Wholegrain Dog Biscuits 1kg

The product was recalled because it may contain pieces of string or twine.'

3.)

'Whiskas dry cat food

This type of plastic contamination would not be considered to cause long-standing or chronic illness.'

4.)

'Ultimates cat food

veterinary literature about Vitamin D toxicity caused by diets (link:

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5731632/> ')

5.)

'Best Feline Friend

There also remain unanswered questions regarding the cause of the toxicity, and as with many of the chronic events it is likely multifactorial.'

6.)

'Advance Dermocare

Following the recall and sponsored by the working dog facility, an epidemiological investigation was undertaken by the University of Melbourne. The increased incidence in diagnosis of [Megaoesophagus] MO occurred late in 2017, confirming an outbreak. The study identified that ~4% of dogs that ate Advance Dermocare were diagnosed with MO, however dogs in the same household eating the diet had a ~30% chance of being diagnosed. This low incidence (and increased incidence within a household) suggests the following:

- There may have been more dogs silently or sub-clinically affected than able to determine, and so a greater number affected may have become apparent if the diet had been fed for longer.
- There was a change in incidence of MO mid-2018, and as the product had been on the market for over 5 years without such an incidence, it is likely associated with a batch issue in the last 6 months of production during 2018.
- The disease did not affect all/most dogs, and so other factors like genetics, environment or concurrent disease may impact disease development.
- There are two unique ingredients for Advance Dermocare that are not present in other brands within the MPA product line, increased maize gluten (corn) and tuna/pilchard autolysate. Focus on these two ingredients formed much of the focus of toxicological investigation.

Investigations by MPA and the University of Melbourne failed to identify any nutritional deficiency, nutritional excess or toxin in doses known to cause disease. A copy of the publicly available report is attached in appendix 4. Further investigation is ongoing to try and determine the underlying cause(s), but chronic exposure to a low level of a previously unconsidered toxin is a possibility, especially if this toxin is processed differently by individual dogs.'

7.)

'Applaws It's All Good Duck & Venison dry food.

reports of 2 dogs being unwell and 20 complaints of mould'

8.)

'Royal Canin dry dog food

The report on Choice Australia web-site details an individual customer who had their dog become unwell and show clinical signs of liver toxicity. This coincided with a switch to a Royal Canin product and finding mould in the bag before the expiration date.'

9.)

'Black Hawk Grain Free Salmon Dog food

"Essentially, we had a couple of bad batches of salmon enter our manufacturing process that led to some dogs having an upset stomach. . ."

10.)

'Hill's Pet Nutrition Recall of tinned food due to Hypervitaminoses D

Hill's Pet Nutrition voluntarily recalled a list of canned dog food products February 1st , 2019 and then expanded the recall list March 12th , 2019 due to excess Vitamin D concentrations. Following the recall, Hill's issued a statement confirming that the issue was isolated to a vitamin premix used in canned dog foods and limited to specific production lots. '

11.)

'My Dog® Beef and Liver 100g 12 x pack

This product was recalled by Mars Petcare Australia (MPA) due to potential plastic contamination, affecting only one batch

The process was managed by MPA, and there are no reports to suggest that any dogs were affected adversely.

This product is completely balanced and produced according to AS5812:2017 guidelines.'

12.)

'Jerky treat-associated Fanconi syndrome/renal tubular disease.

In 2007, a world-wide association between a specific brand of dog treat (Kramar™ chicken jerky) and renal tubulopathy was identified.

According to the US FDA web-site <https://www.fda.gov/animal-veterinary/news-events/fda-investigates-animal-illnesses-linked-jerky-pet-treats> there are continuing reports of this, still with no obvious explanation for the cause. '

In respect to item 1.) -- Thiamine deficiency arising from sulphites in fresh minced meat -- the resultant destruction of thiamine is a well known and well understood potential problem. Supplementing sulphite treated products with thiamine overcomes that aspect. However, minced meat products suffer from other rather more significant shortcomings vis: a.) soft texture resulting in gum disease and its sequelae b.) insufficient calcium resulting in soft bones especially in kittens and puppies c.) pets become addicted and owners become habituated to feeding the harmful products.

Professor Mansfield and her associate pay no attention to a, b and c. However Aldi's supplier of minced kangaroo appear to be cognisant of issues beyond thiamine. Their 'Cachet' minced kangaroo turns a potential liability into a sales advantage. Their package label proclaims: 'Source of Vitamin B1 (Thiamine)'. Conversely, in tiny writing, the label states: 'Intended for occasional or supplemental feeding'. Despite that the product, according to the manufacturers, should only be fed occasionally (or never) the product is presented in five 'Convenient controlled portions for your pet'. By tricky marketing cat owners are induced to feed the harmful minced raw product either predominantly or exclusively to their addicted and progressively sickening pets. The regulator, fixated on thiamine deficiency, is reassured, but the consumers and their cats are abandoned to the ruses of Aldi and their minced meat suppliers.

Regarding items 2.), 3.) and 11.) the trivial but noticeable foreign items (string, plastic granules) represent 25% of reported 'safety events'. However string and plastic are biologically inert substances that pass through the digestive tract of a carnivore unchanged -- akin to the feathers and fur a carnivore digestive tract is specifically designed to deal with. Items 2.), 3.) and 11.), by virtue of being typical junk products, can be assumed to maim and kill thousands of animals on a daily basis. Unfortunately devastating diseases and death are deliberately overlooked whilst inconsequential cosmetic appearances are the regulator's main focus.

Items 4.) and 10.) concern over supplementation with Vitamin D and once identified as a problem the source could be traced and corrected. However it should be noted that making the diagnosis and having a high index of suspicion about an individual toxicity issue is highly unreliable factor for vets working in isolation in clinical practice. In other words the problem can persist unsuspected, unknown and undetected for a considerable time.

The same pertains to 5.), 6.), 9.) and 12.) where identifying a problem and relating it back to one particular commercial product proved extremely difficult. And even though specific products were implicated the actual modes of aberrant toxicity remain uncertain. The guaranteed morbidity and mortality arising from those processed products arising from gum disease, obesity and a litany of diet induced diseases once again get a free pass.

Out of the twelve reported instances we are left with items 7.) and 8.) where the artificial products were visibly affected by mould. Although a connection could readily be made by the owners and attending veterinarians in respect to mould contamination, they appear to have overlooked the certain health impairments arising from regular feeding of artificial industrial products.

In summary, fixation by the Working Group Consultants on the issues as listed 1.) to 12.) represent an absurd charade when issues of towering consequence arising from 'dry and tinned food' remain matters of callous indifference.

Questions arising

You predict that despite the devastation wrought by dry and tinned pet food it will continue to be made. If you are right, then pet owners will continue without proper regulatory protection, abandoned to the mercy of unscrupulous pet-food makers and variously incompetent or unscrupulous vets.

Under the circumstances you envisage, there will inevitably be an endless procession of diet affected sick and debilitated pets. Vets, under those circumstances and free from regulatory oversight, will likely continue

to recommend and stock the harmful products and then proceed to incorrectly diagnose and treat diet induced ill health. Veterinary misdirected treatments and massive over-servicing will continue to be the norm.

What is the Department of Agriculture's advice to those pet owners who suffer loss and whose pets are so affected?

- Do pet owners have remedies under the current regulations?
- Will pet owners have remedies under contemplated future regulations?
- To which government departments should pet owners refer their concerns?
- Does the Department of Agriculture, having accepted the existence of dry and tinned pet food, bear responsibility for the inevitable diet induced ill health with all the cruelty, health and financial implications?
- Will pet owners need to seek redress from manufacturers, vets, veterinary schools or various levels of government?

Invitation

[Wikipedia explains](#) the phenomenon of 'deep capture' where businesses have an incentive to control anything that has power over them. I believe that the Pet Food Review Working Group enjoys considerable power -- power that must not be compromised by the artificial pet-food industry and its veterinary and RSPCA allies.

Accordingly I invite you to enter into discussions for the benefit of pets, pet owners and the wider Australian community. I am available to visit Canberra. However I believe you would gain much from visiting our practice; seeing the contrast between junk food fed and naturally fed animals and meeting my staff and clients.

Thank you for your consideration.

Best wishes,

Tom

At 02:33 PM 4/02/2020, Thomson, Sally wrote:

Dear Tom

Attached are the consultant's reports for your information.

The review group consists of a wide range of pet food stakeholders who the department believes should all have the opportunity to have their say in trying to improve the safety and regulation of pet food. The membership includes representatives from all the organisations and government bodies that were referenced in the Senate inquiry recommendations as having a role to play in the future regulation and oversight of pet food manufacture and sale.

There are 13 members in the review group (plus some observers who don't have a say in the decision making). There is one member from the pet food industry, one from the AVA and one from the RSPCA. This leaves ten other members who are not part of your conspiracy theory. The group works by having civil discussions and making decisions via consensus therefore those three members do not have an undue influence on the decisions of the group and the group is not compromised.

The pet food industry will continue and dry and tinned pet food will continue to be made so it is important to develop systems and process that will improve the safety and quality of that pet food. It is also important to give consumers a choice while providing them with all the information necessary to enable them to make informed decisions on what they feed their pets.

Regards
Sally

Sally Thomson
| Animal Disease Preparedness and Response |
Animal Health Policy Branch | Animal Division
Phone: 02 6272 5316
E: sal.thomson@awe.gov.au
Department of Agriculture, Water and the Environment
18 Marcus Clarke St
GPO Box 858 Canberra City ACT 2601

From: Tom Lonsdale [<mailto:tom@rawmeatybones.com>]
Sent: Friday, 31 January 2020 11:27 AM
To: Thomson, Sally <sal.thomson@agriculture.gov.au>
Cc: mark.booth@foodstandards.gov.au; Clegg, Narelle <Narelle.Clegg@agriculture.gov.au>;
cvo.victoria@agriculture.vic.gov.au; neville.matthew@acc.gov.au; Nada.Anderson@acc.gov.au;
enquiries@health.gov.au; cnsadmin@industry.gov.au; Scott.crerar@foodstandards.gov.au;
nsw.agriculture@dpi.nsw.gov.au; info@safefood.qld.gov.au; Johar, Kiran
<Kiran.Johar@agriculture.gov.au>
Subject: RE: Pet-food industry -- regulatory capture [SEC=UNCLASSIFIED]

Dear Sally,

Thank you for your 16 December message.

Questions remaining

Please provide Agriculture Department responses to the questions raised in my 16 December 2019 email below.

I note your comment: 'The adequacies of a raw food diet versus a commercial diet for pets was out of scope of the review'.

If your focus is solely on the adequacy of manufactured products will you therefore examine and report on fundamental adequacy and safety aspects of commercial diets? Without baseline data on the presence or absence of commercial diet related diseases, it's impossible to assess changes in disease outcomes as they may pertain to individual manufactured products. Or does the Working Group simply assume that commercial diets are suitable and safe, and without any demonstrable adverse consequences, for whole of life feeding of domestic pets? Please advise.

Regulatory capture

Please note our correspondence subject line: 'Pet-food industry -- regulatory capture.'

Senator Griff, in June 2018, when announcing that the Senate was to 'inquire into problem-plagued pet food industry' stated: "[It's the old 'Dracula in charge of the blood bank' problem.](#)"

It appears that the Working Group has been captured by Dracula in the guise of the pet-food industry/veterinary/animal welfare alliance. In my supplementary submission to the Senate Pet Food Inquiry I described the alliance as a ['three party alliance \[that\] amounts to a massive international white collar criminal conspiracy against the interests of pets, people and the planet.'](#)

I note the prominence in the Working Group of the pet-food makers Mars Inc. and Nestle, the Australian

Veterinary Association and RSPCA .

The Working Group veterinary consultant Professor Caroline Mansfield is a known proponent of processed pet food and is mentioned in the April 2018 [Melbourne University FOI Enquiry](#). [Speaking on ABC Radio](#), [Professor Mansfield defended processed food](#) and asserted that 'Dogs are omnivores -- just like us'. Does the Working Group share Professor Mansfield's views?

Independent report

If my allegations contain even a smidgen of truth then it would appear that the public interest is sorely compromised by the composition of the Working Group and the likely report so emanating.

It's my further belief that the state and territory Agriculture Ministers will need to be provided with an independent, objective report free from pet-food industry influence that demonstrates the widespread cruelty and consumer fraud perpetrated by the pet-food industry/veterinary/animal welfare alliance.

Will the federal Department of Agriculture give consideration to this very important matter?

Here's hoping 2020 will be a good year for Australian pets and pet owners as brokered by a humane, thoughtful and responsible Australian Government.

Best wishes,

Tom

At 04:17 PM 16/12/2019, Thomson, Sally wrote:

Dear Tom

The definition of pet food was agreed to by all members of the review working group and is based on the definition in AS5812-2017. It was decided to use that definition as it was considered unworkable to develop regulations regarding the health and safety of pet food if that definition did not cover all products regulated by AS5812-2017.

It was also agreed that similar to the decision made by the Senate Inquiry into pet food regulation, the adequacies of a raw food diet versus a commercial diet for pets was out of scope of the review.

The pet food review working group will be providing a report to a meeting of state and territory Agriculture Ministers next year for their consideration as pet food regulation and safety is covered by legislation in each state and territory, not by the federal government.

Both myself and Narelle Clegg are on the pet food review group. Kiran Johar was acting in the position for a short period only.

Regards

Sally

Sally Thomson

A/g Principal Veterinary Officer | Animal Health Policy | Animal Division

Department of Agriculture

18 Marcus Clarke St

Canberra ACT 2601

(02 6272 5316 |

E: sal.thomson@agriculture.gov.au

From: Tom Lonsdale [<mailto:tom@rawmeatybones.com>]
Sent: Monday, 16 December 2019 11:48 AM
To: Thomson, Sally <sal.thomson@agriculture.gov.au>
Cc: Clegg, Narelle <Narelle.Clegg@agriculture.gov.au>; Nada.Anderson@accg.gov.au;
enquiries@health.gov.au; cnsadmin@industry.gov.au; Scott.crerar@foodstandards.gov.au;
nsw.agriculture@dpi.nsw.gov.au; info@safefood.qld.gov.au
Subject: RE: FW: Pet-food industry -- regulatory capture [SEC=UNCLASSIFIED]

Dear Sally,

Thank you for your message re-asserting aspects of Dr Kiran Johar's statement of 13 November 2019. Sorry if I did not make clear that in the first instance I wish to understand your justification for the apparent perverse definition of 'pet food' adopted by the Pet Food Review Working Group:

1. The Working Group definition for 'pet food'.

For the purposes of the review pet food has been defined as food for dogs or cats including all types of dry, semi-moist, retorted, pasteurised, chilled, frozen and other food manufactured for consumption by domestic dogs or cats including pet meat.

The definition so adopted appears to provide Australian Government endorsement and serves to normalise and accept junk food as the appropriate scientific, humane and legal standard for the long term feeding of dogs and cats.

Please advise what if any objective, independent scientific literature defines 'junk food' as being suitable and safe for humans as a long term maintenance diet.

Please advise what if any objective, independent scientific literature defines 'junk food' as being suitable and safe for dogs and cats as a long term maintenance diet.

Junk food is commonly recognised as the source of extensive morbidity and mortality in humans involving a range of metabolic and systemic ailments. There is a growing body of evidence that the situation is arguably worse for pets.

Please advise on what grounds the Working Group places its imprimatur upon the feeding of junk food to pets and thus the imposition of chronic ill health, suffering and abuse on those animals.

I note that the Australian Consumer and Competition Commission (ACCC) has representation on the Working Group and presumably ratifies the rulings of the Group.

Please advise what if any advice the ACCC has provided regarding the ongoing consumer fraud perpetrated by an alliance of junk pet food companies, vets and RSPCA -- members of which organisations sit on the Working Group.

Please advise what if any legal advice the Working Group has received regarding the matters I have raised. Specifically, please advise if by the continued adherence to perverse definitions and the endorsement of false, misleading and fraudulent conduct by junk pet food companies, vets and the RSPCA that the Federal Government may incur legal liability whether at the current time or in the foreseeable future.

Previously I have received correspondence from Narelle Clegg, Dr Kiran Johar and now yourself.

Please advise to whom concerns about the Pet Food Review Working Group should be addressed.

With thanks.

Best wishes,

Tom

At 10:42 AM 5/12/2019, Thomson, Sally wrote:

Dear Tom

Thank you for your email of 1 December on your pet food concerns.

I refer you to our reply dated 13 November 2019, that covers these issues.

Regards

Sally

Sally Thomson

Senior Veterinary Officer | Animal Health Policy Branch | Animal Division
Phone +61 2 6272 5316

Email: sal.thomson@agriculture.gov.au

Department of Agriculture
18 Marcus Clarke st, Canberra ACT 2601
GPO Box 858 Canberra ACT 2601 Australia

From: Tom Lonsdale [<mailto:tom@rawmeatybones.com>]
Sent: Sunday, 1 December 2019 2:56 PM
To: Johar, Kiran <Kiran.Johar@agriculture.gov.au>
Cc: mark.booth@foodstandards.gov.au; Clegg, Narelle <Narelle.Clegg@agriculture.gov.au>; Thomson, Sally <sal.thomson@agriculture.gov.au>; cvo.victoria@agriculture.vic.gov.au; neville.matthew@acc.gov.au; Nada.Anderson@acc.gov.au; enquiries@health.gov.au; cnsadmin@industry.gov.au; Scott.crerar@foodstandards.gov.au; nsw.agriculture@dpi.nsw.gov.au; info@safefood.qld.gov.au
Subject: Re: FW: Pet-food industry -- regulatory capture [SEC=UNCLASSIFIED]

Hi Kiran,
Please give an indication when I may expect your response to the Sunday 17 November 2019 email below.
Best wishes,
Tom Lonsdale

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Hi Kiran,
Thanks for info.
I hope to respond more fully in the coming days.
Meanwhile I must say I'm alarmed at the definition that the government Working Group considers acceptable for 'pet food' and that such highly processed concoctions can be considered either suitable or 'safe' for the exclusive long term feeding of pet dogs and cats.
Please bear in mind that the owners of dogs and cats want and expect their animals to live a long and disease free life -- as opposed to the owners of production animals e.g. pigs/poultry/dairy cows who may employ artificial diets for specific short term goals.
As you know humans, if they were to be maintained exclusively on 'manufactured food', would suffer progressive ill health on a number of fronts and ultimately suffer an early death -- whether or not they brushed their teeth.
For dogs and cats the issues are more immediate and severe -- although they are biologically programmed to disguise their infirmity.
Unfortunately because all or almost all dogs and cats are maintained on 'manufactured food' then ill health and chronic disease are the norm. Only by stopping the manufactured diets, and in hindsight, do owners come to realise how sick their pets were when maintained on the junk diets. 'Like a puppy or kitten again' they say about their elderly pets finally switched from junk food to a more natural raw meaty bones based diet.
Please bear in mind that the average vet never ever switches the diet of a dog or cat from manufactured junk to whole carcasses -- carnivore 'food' as defined by nature -- or the practical alternative, raw meaty bones. Consequently the average vet has no theoretical knowledge, no practical experience or hindsight and thus lives in a cocoon of ignorance.
To my mind there can be no scientific, humane or legal justification for the government Pet Food Review Working Group to abandon Australia's pets and their owners to the devastation arising from 'manufactured food' and the ministrations of those who live in a cocoon of ignorance.
In December 1992 Dr Bryden, Director of the Sydney University Post Graduate Foundation in Veterinary Science, visited my practice. He was astounded to see the contrast between animals fed on junk and those

fed raw meaty bones. He commissioned me to write this chapter:

<http://www.rawmeatybones.com/pdf/Vet%20Dentistry%201993.pdf>

In February 2018 Dr Richard Malik of the University of Sydney Centre for Veterinary Education commissioned an article with the following comment: 'I know it's in your book [Raw Meaty Bones], but we have a new generation of vets.'

<http://www.rawmeatybones.com/pdf/C&T%205682%20T%20Lonsdale%20Raw%20meaty%20bones%20essentials%20June%202018.pdf>

It's my view that the two above mentioned articles -- based on the appropriate definition of 'food' for carnivores -- set the scientific, humane and legal standard for the feeding of domestic cats and dogs in Australia.

Please advise.

Best wishes,

Tom

CC Interested parties.

At 01:07 PM 13/11/2019, Johar, Kiran wrote:

Dear Mr Lonsdale

Thank you for your email of 12 November 2019 to Dr Narelle Clegg. I am responding on behalf of Dr Clegg who is away. I have provided answers to your questions below.

1. The Working Group definition for 'pet food'.

For the purposes of the review pet food has been defined as food for dogs or cats including all types of dry, semi-moist, retorted, pasteurised, chilled, frozen and other food manufactured for consumption by domestic dogs or cats including pet meat.

2. The Working Group criteria for 'safety' as it relates to commercial 'pet food'

The working group's considerations around safety are based on what was discussed and reported on in the Senate inquiry as well as the concerns voiced by pet owners and the past history of pet food incidents. This includes: reviewing the Senate inquiry report; reviewing reported pet food incidents (i.e. reports of pets becoming ill and/or dying) and assessing the effectiveness of the response to these events. A major concern of pet owners is the lack of any formal recall system for pet food and confusion around mechanisms available to the public to report pet food incidents. The adequacy of the Australian Standard for manufacturing and marketing of pet food (AS5812:2017), including labelling requirements to enable production of safe pet food is included in the safety remit.

3. The names and briefs of your consultants.

There were two consultants engaged to assist the Pet Food Review Working Group. One to review pet food regulation in Australia and overseas and the other one to review pet food safety in Australia and overseas.

· The consultant for the review into pet food regulation in Australia is Sharon Givoni Consulting.

· The consultant for the review into pet food safety in Australia is Professor Caroline Mansfield, University of Melbourne.

4. The likely time frame for release of your findings.

We expect that the working group will provide a finalised report by early next year. The working group and consultants have considered all representations to the Senate inquiry and are aware of your publications. The main focus of this review is the safety and regulation of products that are sold as pet food including the labelling claims of those products. The working group includes representatives from a number of states as the legislative responsibility for pet food lies with the states and territory governments.

Regards

Kiran

Dr Kiran Johar

Animal Health Policy Branch | Biosecurity Animal Division

Department of Agriculture

GPO Box 858; Canberra ACT 2601 Australia
Phone:+61 2 6272 3933 | email: kiran.johar@agriculture.gov.au

The department acknowledges the traditional owners of country throughout Australia and their continuing connection to land, sea and community. We pay our respects to traditional owners, their cultures and elders past and present.

Date: Tue, 12 Nov 2019 13:00:58 +1100
To: narelle.clegg@agriculture.gov.au
From: Tom Lonsdale <tom@rawmeatybones.com>
Subject: Pet-food industry -- regulatory capture
Bcc: f\Friends\Breck,f\Contacts\Cush

Dear Ms Clegg,

Please find attached FOI results which, I believe, give rise to concerns regarding the probity of the government's conduct.

Back in [1991 Dr Breck Muir and I blew the whistle on the junk pet food industry/veterinary alliance](#) and the resultant widespread cruelty to pets and the mass defrauding of the pet owning public.

Rather than address the grave and ongoing concerns, the junk pet-food makers (principally Mars, Nestle and Colgate-Palmolive) together with their veterinary collaborators and the RSPCA doubled down on their efforts to suppress and defend their commercial interests.

Throughout the period since 1991 various State and Federal governments have succumbed to '[regulatory capture](#)' and have failed to take account of the mounting evidence of serial misconduct on a vast scale.

Please advise:

The Working Group definition for 'pet food'.

The Working Group criteria for 'safety' as it relates to commercial 'pet food' -- bearing in mind that human nutritional research universally confirms that a highly processed canned or packaged diet is neither suitable nor safe for human omnivores. The same must surely pertain, by definition, to the needs of carnivores at the extreme end of the nutritional spectrum -- although as you will be aware there is a paucity of comparative research evidence due to the suppression by the junk pet-food makers and their veterinary collaborators.

The names and briefs of your consultants.

The likely time frame for release of your findings.

Please advise if you and the Working Group have taken account of the information at:

<http://www.rawmeatybones.com/elections.php> and in particular the information at:

<http://www.rawmeatybones.com/pdf/Subcoveringletter.pdf>

<https://www.aph.gov.au/DocumentStore.ashx?id=2801c4d3-3ac3-4eef-ae60-37ddbe61ac30&subId=658689>

<http://www.rawmeatybones.com/pdf/SupSub.pdf>

'Expert witness statements: Raw meaty bones proponents'

at: <http://www.rawmeatybones.com/pdf/SenateSubs151.pdf>

With thanks,

Tom Lonsdale

CC: Other interested parties

X-AuditID: 0a060a62-413c09c0000067b1-dd-5dc10f9a1ed4

From: Foi <foi@agriculture.gov.au>

To: "'tom@rawmeatybones.com'" <tom@rawmeatybones.com>

CC: Foi <foi@agriculture.gov.au>

Subject: FOI Matter - LEX-2850 - Decision [SEC=UNCLASSIFIED]

Thread-Topic: FOI Matter - LEX-2850 - Decision [SEC=UNCLASSIFIED]

Dear Mr Lonsdale,

Please find attached the decision and documents in relation to your freedom of information application.

Regards,

Louise Dorrian

Freedom of Information Team

Email foi@agriculture.gov.au

Department of Agriculture www.agriculture.gov.au

18 Marcus Clarke Street, Canberra ACT 2601 Australia GPO Box 858