

**Submission  
No 12**

## **INQUIRY INTO POUNDS IN NEW SOUTH WALES**

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6 August 2023

The Hon. Emma Hurst, MLC  
Chair, Portfolio Committee No 8 Customer Service  
Parliament House  
Macquarie Street  
SYDNEY NSW 2000

Dear Ms Hurst,

## **Inquiry into pounds in New South Wales**

I write in response to the Portfolio Committee No 8 Inquiry into pounds in New South Wales.

### **Qualifications**

I graduated from the Royal Veterinary College, University of London in 1972. In 1981 I established the first of a small cluster of veterinary practices in the Blacktown and Hawkesbury areas of Outer Western Sydney. Until my retirement in 2022 I had contact with and awareness of the pounds in Blacktown and Windsor.

In [1991 I first blew the whistle on the animal cruelty and consumer fraud](#) arising out of the industrial pet food/veterinary/animal welfare alliance. From that time to the present, I became a campaigner and have written numerous articles and contested several [Australian Veterinary Association elections and 24 consecutive annual UK Royal College of Veterinary Surgeons elections](#).

The scientific validity of my allegations is supported by the high-ranking endorsements available [here](#).

The University of Sydney Centre for Veterinary Education commissioned me to provide essential information for all vets in [1993](#) and again in [2018](#).

My website [www.ThePetFoodCon.com](http://www.ThePetFoodCon.com) and [YouTube Channel](#) provide background information.

I offer the [2007 'Junk Pet Food And The Damage Done' article](#), republished in 2023, as an abbreviated introduction to the subject of the junk pet food/vet/animal welfare alliance and the cruelty so arising.

I offer my three books as integral parts of this submission:

*Raw Meaty Bones: Promote Health* (2001)

*Work Wonders: Feed Your Dog Raw Meaty Bones* (2005)

*Multi-Billion-Dollar Pet Food Fraud: Hiding in Plain Sight* (2023)

Please also take into consideration [my submission to the Portfolio Committee No 4 Regional NSW Inquiry](#): ‘Veterinary workforce shortage in New South Wales’.

The UK House of Commons Environment, Food and Rural Affairs Committee (EFRACom) invited me to make a submission to the [‘Pet welfare and abuse’ Inquiry](#). I believe that my submission (submitted 25 July 2023) provides an international dimension to the problems associated with discarded and abandoned dogs and cats.

### **Introduction**

Before considering pounds, their purpose and performance, I believe it’s necessary to understand the context within which they operate.

### ***Global situation***

There is a common assumption that pet ownership is demand driven and always been a part of modern life. That’s to suggest the acquisition of pet dogs and cats is a response to innate desires and fundamental needs of people.

However, if we look at global pet ownership patterns we find that they correlate with pet food industry promotional activities, both overt and clandestine, in rich economies

Quoting from my EFRACom submission:

I believe that disregard for pet welfare and animal abuse is baked into the system such that it’s seen as an inescapable fact of life.

Pet ownership, more particularly dog ownership, was first popularised in the 1860s when Jack Spratt teamed up with Charles Cruft to market Spratt’s Meat Fibrine Dog Cakes. They hit on the idea to organise pedigree dog shows—for dogs (modified wolves) with assorted genetic mutations—to boost their business.

Straightaway we see the stage was set for 150 years of cultural conditioning that has championed the more outlandish genetic variants fed, not on wolf food but, on baked biscuits made from wheat, beetroot and beef blood. Genetic mutation has ensured a lifetime of discomfort and susceptibility to disease for at least [182 different pedigree dog breeds suffering from one or more of 334 disease syndromes](#). When we add susceptibility to periodontal disease (gum disease) affecting around 80 percent of dogs over the age of three and an unknown percentage suffering mental health impairment, then we become aware of massive in-built problems.

However, it’s the insistence that the wolf descendants and now, in the modern-day modified desert predators, cats, should survive on ultra-processed junk that has cemented animal abuse as merely the way we do things in the ‘advanced’ western economies.

From the 1860s to the present the pet food industry formula remains the same: promote dogs and cats, not as sentient creatures but, as variously cute/cuddly/amusing furry toys with little in the need for maintenance—except what is conveniently made available on the supermarket shelf.

### ***Australian situation***

In 1966/7, 100 years after Spratt and Cruft established their two-pronged winning formula—promote pet ownership to sell industrial junk food—the Mars Corporation established their Australian production facility in Albury-Wodonga and simultaneously established their promotional vehicle, the Pet Care Information and Advisory Service (PIAS).

The targets of the Mars effort seldom or never knew about the providence of the commercially inspired PIAS material, disguised as neutral ‘information’, that filled the pages and airwaves of newspapers, magazines, radio shows and TV commercials. Hundreds of newspapers welcomed the regular articles complete with carefully produced illustrations with no need for journalistic effort. It was the same for city-based and regional radio stations that aired the ‘information’ segments.

PIAS was active promoting pets in classrooms, high-rise apartments and university ‘research’ programs. State and local governments were a target—Hawkesbury City Council kept a store of PIAS brochures. Medical journals were fed pet food propaganda and pet food company operatives kept an eye on trauma surgeons discussing the tragedies of dog-bitten toddlers. Champion the upside, blunt the downside was the strategy—relentlessly, single-mindedly without pause.

In March 1997 ABC Media Watch, headed by eminent Sydney lawyer Stuart Littlemore QC, reported on the Mars Corporation clandestine activities.

#### [ABC Media Watch Transcript](#)

Stuart Littlemore (SL).....but wait there's more. On ABC radio, to which the same anti-commercial policies apply, or do they? For instance, Radio National's "Science Show", presided over by Robyn Williams, a man close to canonisation. He's just completed a presentation of a four-part series on why people should keep dogs and cats. Oh! they didn't admit that was the subject, but it was. Written and narrated by a publicist for something called 'the Pet Care Information and Advisory Service', which it seems fair to say, is nothing more than a front for the multi-national pet food manufacturer Mars, through its Australian subsidiary Uncle Bens.

Voice Over (VO)... "Funding is provided by Uncle Bens of Australia".

(SL)...Uncle Bens makes Pal, Meaty Bites, Whiskas, Dine, My Dog, Good-O, Kitty Kat and Chum amongst others. They've cornered 65% of the prepared pet food market in this country and through their Petcare Information and Advisory Service front, they pay the wages of a vet called Jonica Newby. Here she is doing a *sub-rosa* TV commercial for Uncle Bens.

Jonica Newby (JN)... "No matter what type of person you are or what type of lifestyle you have, there's a dog that's perfect for you. And remember a dog is a friend for life."

(SL)...And here she is in *Women's Weekly* writing about pet care. On the page opposite an advert for an Uncle Bens product. And again, and again. And here's her intro from Robyn Williams.

Robyn Williams (RW)... "Today is the start of a four-part 'Science Show' series, written and presented by Dr Jonica Newby, who's a vet from Melbourne".

(SL)...What he should have said is that she works in the pet food promotion business. No, I'm wrong. She shouldn't have been on the ABC at all. It's a crudely subtle pitch. Jonica Newby didn't tell us to buy Pal in so many words, but to keep pets. Well, we have to buy food for them don't we?

(JN)... "Being a multi-cultural society means being multi-species as well"

(SL)...Oh, and more such arrant tosh, highly insulting to her audience's intelligence. Urban planners feel Uncle Bens' lash for not encouraging greater consumption of Meaty Bites.

Media Watch aired two more PIAS exposés. But no one in authority took due notice or took action.

Nowadays overt false and misleading pet food propaganda appears on an endless loop in all forms of print, electronic and social media. The media outlets take the money and the government regulators fail to act.

Every extra canine/feline mouth, over its lifetime, is worth thousands of dollars to the transnational companies driving the pet food gravy train.

### ***Consumers bear all the costs***

Consumers, little realising the relentless indoctrination, pay and pay. With no formal or informal education on the biological imperatives applicable to dogs (modified wolves) and cats (modified desert predators) consumers are left to muddle through the care and management needs of domesticated carnivores.

Which brings us to a consideration of pounds and their role dealing with the constant stream of surplus, unwanted, discarded, abandoned, sick and ailing pets.

Consumers, pet owners, are caught in the middle. There is a supposition that they have some agency, some ability to take independent action based on independent thought. Unfortunately, as cogs in the machine, their range of options are severely limited.

Profits are privatised. The pet food companies make \$billions with their scam. The veterinary profession, head down and concentrating on the overservicing that passes for 'best practice', turns a blind eye to the consumer fraud and animal cruelty.

Costs are socialised. It's community rates and taxes that pay for the council animal control officers, council pounds, environmental impacts and hospital trauma facilities.

### ***Stem the flow of unwanted pets***

There are two simple solutions to stem the flow of abandoned animals, the wastage and excess generated by the unacknowledged, uncontrolled pet food/vet/animal welfare alliance.

- 1.) Turn off the tap. Enforce existing animal welfare and consumer protection laws. Stop the false and misleading pet food advertisements. Stop the sale of harmful junk food that renders pets chronically sick and costing huge amounts in maintenance and health care.
- 2.) Pending turning off the tap, the companies should be charged a fee (tied to their advertising and marketing expenditure) to cover all urban animal management functions across Australia. Simultaneously companies should be required to post warning labels on their packets indicating the health impacts of their products and recommending that pet ownership of carnivores requires extensive knowledge and attention to detail.

## **TERMS OF REFERENCE**

**Inquiry into pounds in New South Wales TERMS OF REFERENCE 1. That Portfolio Committee 8 – Customer Service inquire into and report on pounds in New South Wales, and in particular:**

- (a) resourcing challenges affecting New South Wales pounds, including the adequacy of funding given towards the operation of pounds by local and state governments**

By accepting responsibility for urban animal management, councils assume responsibilities that, under current conditions, will always be hard/impossible to fulfil. Funding will always be inadequate. As fast as councils meet their current obligations, more will be created by so-called ‘irresponsible’ pet owners. However, pet owners are the unwitting victims, ill-equipped to take rational buying decisions and then take the necessary pet care decisions incumbent on anyone owning a modified wolf or desert predator.

- (b) the adequacy of pound buildings and facilities in New South Wales**

As a general statement and insofar as those buildings and facilities meet current needs, then by turning off the tap, slowing and then stopping the mass promotion of pet ownership existing facilities will meet future needs.

- (c) welfare challenges facing animals in pounds across New South Wales, including the provision of housing, bedding, feeding, exercise, enrichment, veterinary treatment, vaccination and desexing**

From the time of [first blowing the whistle on the junk pet food/vet/animal welfare alliance in 1991](#) welfare challenges facing *all* pet animals across Australia have been well-known in veterinary circles, but suppressed. Most dogs, pack animals, are kept in solitary confinement, fed toxic junk, lack exercise and enrichment. Many pets never see the vet. For those that do receive veterinary treatment, that treatment is generally founded on the (illicit) acceptance of artificial pet food diets. Consequently, there’s extensive overservicing the needs of those pets whose owners can afford or have pet health insurance.

Annual vaccination of already immune animals—often against rare or non-existent diseases—is [part of a wider marketing scam](#).

In this context it’s unreasonable to put undue pressure on public authorities to do more or ‘better’ than that which prevails in veterinary clinics and private homes across the nation.

By turning off the tap public authorities will be required to provide for fewer animals and prior to that junk pet food companies should be required to fund the facilities.

- (d) the adequacy of the laws, regulations and codes governing New South Wales pounds, including the Companion Animals Act 1998 (NSW) and the NSW Animal Welfare Code of Practice No 5 – Dogs and cats in animal boarding establishments (1996), as well as the adequacy of the current enforcement and compliance regime**

### Companion Animals Act 1998

From my reading of the Act it is long on proscription but short on prescription. The overriding assumptions are that pet owners are both informed and competent, when in fact the very opposite is the case.

Under ‘Definitions’ ‘approved animal welfare organisation’ means any of the following—

- (a) the Royal Society for the Prevention of Cruelty to Animals, New South Wales,
- (b) the Animal Welfare League NSW,
- (c) the Cat Protection Society of NSW Limited,

The above-mentioned organisations are in part funded by and are allies of the artificial pet food industry and depend for their existence on a large number of unwanted and discarded animals.

The charities’ own welfare and that of their pet food company sponsors tends to prevail. The welfare of animals becomes a distant secondary consideration.

Conflicts of interest should bar the ‘welfare’ charities from recognition by the Government of NSW. Judicial investigations should be commenced into the charities and their internal and external arrangements.

### NSW Animal Welfare Code of Practice No 5 – Dogs and cats in animal boarding establishments (1996)

The Preface states:

The greater the level of interference with, or control of, an animal's environment, the greater our responsibilities.

The code is neither a complete manual on animal husbandry, nor a static document. It may be revised to take account of advances in the understanding of animal physiology and behaviour, technological changes, changing industry standards, and the community's attitudes and expectations about the welfare of animals.

Compliance with the code does not remove the need to abide by the requirements of any other laws and regulations,

The following Clause 7.1 is, in my view, deceptive and supports junk pet food industry propaganda, not the interests of the animals.

#### 7.1 Food

7.1.1 Animals must receive appropriate, uncontaminated and nutritionally adequate food according to the accepted requirements for the species, breed and age. The food should be in sufficient quantity and of appropriate composition.

7.1.2 A variety of foods should be supplied. Canned and dry foods will form the staple diet in most cases, but fresh meat and fish may tempt fussy eaters.

The use of the euphemism ‘fussy eaters’ hints at the recognition of biological imperatives pertaining to carnivores. The code ratifies the importance and *reasonable practicability* of providing ‘fresh meat and fish’. Consequently, I believe that the pronouncement ‘Canned and dry foods will form the staple diet in most cases’ breaches the [Prevention of Cruelty to Animals Act](#) which states:

#### **Clause 8 Animals to be provided with food, drink or shelter**

- (1) A person in charge of an animal shall not fail to provide the animal with food, drink or shelter, or any of them, which, in each case, is proper and sufficient and which it is *reasonably practicable* [emphasis added] in the circumstances for the person to provide.

#### **Adequacy of laws, enforcement and compliance**

Existing laws prohibit the infliction of lifelong pain and suffering on animals by virtue of an unsuitable and unsafe diet. Consumer protection laws prohibit false and misleading advertising about harmful dietary products. Plainly, whether for animals in the community or in the pound, the current enforcement of and compliance with a number of statutes is inadequate.

Importantly by dint of regulatory capture the veterinary profession and animal welfare groups have become a major part of the problem. Their failure goes beyond mere passive failure to act, they are in fact active promoters of the junk pet food that injures the health of animals and dupes consumers. Unfortunately, insofar as the veterinary profession and welfare groups engage in and advise on enforcement and compliance, it’s often for public relations purposes and a distraction from the main issues hiding in plain sight.

#### **(e) factors influencing the number of animals ending up in New South Wales pounds, and strategies for reducing these numbers**

The factors can be compared to the concentric rings of an onion. At the core is the multi-billion-dollar junk pet food industry artificially creating demand for pet dogs and cats without the industry shouldering any responsibility. The concentric rings of veterinary schools, associations, regulators and practitioners provide justification and protective cordons around the artificial industry that maintains the participants in mutual embrace. Outer rings include the alternative practitioners, breeders, pet shops, insurance agencies, junk raw food manufacturers and other niche marketeers.

The upshot is an ill-educated populace encouraged to keep pets, but without the necessary support or knowledge to take appropriate decisions. Guided by fashion, sentient creatures become a throw-away commodity that in the first place are poorly cared for and then discarded on a whim.



I do not, however, hold pet owners chiefly responsible. Pet owners are mostly well intentioned and are themselves victims of systems seriously out of control.

*Multi-Billion-Dollar Pet Food Fraud: Hiding in Plain Sight* provides 446 pages of explanations and suggested solutions.

I believe that a full NSW Government Inquiry is warranted, and a full Federal Government Inquiry is warranted. Anything less will be a reactive process without due regard for the enormity of the problems.

**(f) euthanasia rates and practices in New South Wales pounds, including the adequacy of reporting of euthanasia rates and other statistics**

I have no access to the statistics or methodologies. However, as with all things the demand, the need for euthanasia, is a function of the over-supply fuelled by an out-of-control pet food industry/veterinary/fake animal welfare alliance.

**(g) the role and challenges of behavioural assessments in New South Wales pounds**

Behavioural assessments are time consuming, difficult, prone to error and costly. If the artificial pet food makers can be made to pay for the service, then some of the problems re cost can be alleviated. Otherwise, I believe that public authorities have other welfare priorities.

**(h) the relationship between New South Wales pounds and animal rescue organisations**

As I understand it, there are inevitable divergencies of opinion on what to do about stray and unwanted animals. Pounds need to provide basic humane shelter and to euthanise surplus animals if homes are not available. Rescue groups tend to want to extend life and find homes in the community for every animal.

The junk pet food industry has recognised the deep commitment of ‘rescue groups’ and now places a heavy emphasis on funding the groups and promoting ‘rescue’. Promoting ‘fostering’ where ‘foster parents’ keep multiple animals—the half-way house between pounds and ‘forever homes’— ensures a maximum number of pets needing to be fed.

The nexus between pet food companies and their rescue group clients needs to be investigated as a foundation for understanding and managing the various factors at play.

**(i) the challenges associated with the number of homeless cats living in New South Wales for both pounds and animal rescue organisations, and strategies for addressing this issue**

The fecundity of cats will always pose difficulties. Trapping, euthanasia and desexing can only, at best, keep pace until means of rendering populations sterile can be accomplished.

Keeping large numbers of cats and kittens in pounds and rescue group facilities encourages the spread and prevalence of disease.

Individual facility solutions can be found. However, to bring in state-wide solutions will be a huge task and with few simple answers.

I suggest that a working group be commissioned for the purpose of deciding appropriate actions in respect to stray, feral and discarded cats.

**(j) strategies for improving the treatment, care and outcomes for animals in New South Wales pounds**

Throwing more money at the problems, employing more staff and veterinary care will make for improved outcomes in the short term. However, in my view that will only serve to further entrench the pet food industry and its protective cordons mentioned above.

Pure and simple, supply far outstrips demand for pet dogs and cats. And at core, since the 1960s, the promotion of pet ownership by giant companies has created the current disaster.

Enforcing existing animal welfare and consumer protection laws against the pet food industry/vet/fake animal welfare alliance will be the first step on the road to resolving the issues.

**(k) any other related matter**

Following on this Inquiry a working group will need to be established to implement recommendations.

Given the allegations of serious misconduct then I believe it's incumbent on the Government to tread warily. There are powerful forces positioned to derail and deflect any proper investigation and resolution of the issues.

This Inquiry can be the forerunner of much wider inquiries involving various NSW and Federal Government departments.

I shall be pleased to provide more information as may be required.

Yours sincerely,

Tom Lonsdale

Enclosures:

*Raw Meaty Bones: Promote Health* (2001)

*Work Wonders: Feed Your Dog Raw Meaty Bones* (2005)

*Multi-Billion-Dollar Pet Food Fraud: Hiding in Plain Sight* (2023)

*Nexus* article: *Junk pet food and the damage done* (2023)

