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4 July 2023

The Hon. Mark Banasiak, MLC Chair, Portfolio Committee No 4 Regional NSW Parliament House Macquarie Street SYDNEY NSW 2000

Dear Mr Banasiak,

Veterinary workforce shortage in New South Wales

I write in response to your Committee Inquiry into the veterinary workforce shortage as it pertains to New South Wales. I note the 14 June 2023 Media Release:

The inquiry was established following media coverage about burn-out in the veterinary profession. There are also reports of workforce shortages, and increased demands for veterinary care due to factors such as growing pet ownership.

The Chair, Mr Banasiak said: "The committee would like to hear from vets, vet nurses, pet owners, farmers, industry and others about the factors that may be impacting access to veterinary care. We are also interested in learning about issues which may impact on the veterinary workforce in Australia, including aspects of the current legislative and regulatory framework."

Please see attached pdf copy of *Multi-Billion-Dollar Pet Food Fraud: Hiding in Plain Sight* and Annexure A responses to Terms of Reference and supporting documents Annexures B and C.

I welcome the Committee's decision to look beyond the current workforce shortage and to conduct a 'deep dive' (Annexure B) into other matters including the 'legislative and regulatory framework'. Whilst ostensibly about New South Wales, the underlying issues are in fact global and have existed for many decades.

Workforce shortages—growing pet ownership

Since <u>first blowing the whistle in 1991</u> I have maintained a campaign for veterinary and pet food industry accountability for what I believe to be a global multi-billion-dollar fraud with massive animal welfare implications.

It's my considered view that most problems arising in the veterinary profession stem from its alliance with the industrial pet food industry. Culturally, socially, economically and politically the pet food

industry and veterinary profession are tightly interdependent. The veterinary profession enjoys self-regulatory status and has been overly concerned with its own self-interest. The veterinary profession is a steadfast defender of the artificial pet food industry, the source of most pet ill-health, and as such has abused public trust.

Demand and supply

'Shortage' implies demand exceeding supply. As such, it's my view that the Committee needs to consider both sides of the equation. Since most demand for veterinary services is in the small animal sector, then solving both demand and supply in that sector is a key aspect to resolving the vet 'shortage' across all sectors.

Demand

Demand is largely a function of culture, and the Australian culture is highly conditioned by the relentless junk pet food advertising that glamourises pet ownership, promoting dogs (modified wolves) and cats (modified desert predators) as items with little in the need of maintenance. As status symbols and fashion statements sentient creatures are commodified by the commercial forces. Owners encouraged to have an unrealistic outlook have unrealistic expectations. However, cultural constraints prevent introspection. Consumers are caught in a trap consuming the commercial offerings with no guidance and no alternatives available.

<u>Dr Mark Roy commenting in *The Guardian*</u> on the ownership of pets wrote:

It seems utterly shocking that ownership of pets is not explicitly licensed for anything other than the non-exotic and even then, it would probably be much better. Fashion-based decisions should not be acceptable and proof of competence to own, house, feed and care for animals should be required. Breeding and supplying any pets should be heavily regulated and limited to species that are suited to amateur care.

In keeping with Dr Roy's commentary, we need to look at 'supply' and question what is happening in the veterinary profession, the arbiters of all things to do with pets. In my view all failings relate back to failings of the veterinary leadership. A full treatise is not possible in this short submission to the Inquiry. Instead, I propose to list some elements of the supply.

Supply

Overwhelmingly entry into the veterinary schools is a female preserve. But given the obvious reasons for female non-participation in the workforce, plus the extra stresses of veterinary life and practice ownership challenges then there is a considerable imbalance between numbers graduating and numbers available to fill the available positions.

Costs to the community are already excessive and to increase the number of university places will only add still more costs to service what in essence is predominantly a fashion/status symbol activity created by and for multi-national pet food makers.

On the supply side, we need to look at the infrastructure and technical ability to provide services and the desire to provide services on the part of the suppliers. There is little concern regarding the adequacy of the veterinary infrastructure available. So, then we need to consider what vets technically do with that infrastructure. And again, we find a severely deficient system. Small animal vets spend an inordinate amount of time and resources on the following list.

- i.) Over-vaccinating animals annually against, for the most part, non-existent diseases.
- ii.) Providing worm treatments for the most part non-existent or harmless worms.
- iii.) Upselling junk pet food, shampoos, flea treatments and pet products.
- iv.) Performing dental treatments directly related to diets of junk pet food.
- v.) Performing elaborate and costly investigations into chronic disease entities directly or indirectly related to diets of junk pet food.
- vi.) Dispensing drugs and treatments for chronically ill patients arising from junk pet food diets.

As can be seen from the above, animal welfare is not a high priority on either the demand or supply side of the equation. Financial considerations are key.

Other factors bear on the 'shortage' including the upsurge in 'alternative practitioners' partly responding to misplaced expectations of the consumers and partly attempting to nullify the failings of the conventional system. And in *absolute* terms there is *no* training for vets in feeding of natural food for pets and thus *almost no* practitioners available to advise consumers and to provide accurate diagnosis and treatment in the face of the junk pet food onslaught. That constitutes an absolute shortage that cannot and will not be alleviated by training more conventional vets utilising the existing failed systems.

When things go wrong it's customary to 'blame the management'. And in this case, there are two tiers of management failure. First, the Government has afforded the veterinary profession self-regulatory status without maintaining adequate management oversight. Second, the veterinary profession has been subject to 'regulatory capture' by the multinational pet food industry with the resultant abrogation of its duties to animals their owners and the wider community.

Promoting pet ownership and the need for veterinary services

Over many decades increasing the number of pets has been and continues to be a primary focus of the junk pet food makers, principally Mars, Nestlé and Colgate-Palmolive, actively supported by the veterinary profession—regardless of the consequences for pets, pet owners and the wider community. Inevitably a constant diet of junk food condemns pets to a litany of chronic and acute disease. A vast and increasing population of sick pets are the stock-in-trade of an expanding veterinary profession. The RSPCA and other 'welfare' groups defer to establishment veterinary opinion, are paid hush money and keep quiet.

Eminent lawyer <u>Stuart Littlemore QC said in March 1997 on ABC Media Watch</u> when speaking about Mars Corporation vet Jonica Newby infiltrating the ABC:

What he [ABC Science Show Presenter Robyn Williams] 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?

Effectively then, the Government and community are held hostage to the self-seeking veterinary profession in collusion with the pet food industry. Issues of adequate supply of veterinary services, mental health issues for vets, dog bites in children and animal welfare initiatives are subordinated to the rapacious appetites of the pet food multi-nationals, veterinary profession and animal welfare groups. Profits are capitalised, costs are socialised and hence this parliamentary inquiry.

By coincidence I recently published two blog posts about the veterinary workforce shortage demonstrating how simply stopping the feeding of junk food to pets leads to a population of healthy animals with little or no need for veterinary services.

Vet Shortage In The Bubble Economy

Vet Shortage In The Bubble Economy II

Current legislative and regulatory framework

Aspects of the broader issues have been raised in NSW Parliament on two previous occasions.

<u>In May 2004 Mr Paul Lynch (Liverpool) advised Parliament</u>: 'There are two levels of serious public policy concern: Did the Board of Veterinary Surgeons refer the matter, either formally or informally, to the Australian Veterinary Association (AVA)? How can the Minister for Primary Industries continue to place reliance upon a group such as the AVA?'

<u>In August 2018 Mr Kevin Conolly (Riverstone) advised Parliament</u>: 'Are companion animals in New South Wales being forced to endure chronic abuse because of the unwillingness of the veterinary profession, the RSPCA, the regulators and academics to consider seriously the relatively simple questions posed by Dr Lonsdale?'

<u>June 2018 letter to The Hon. Mark Speakman, SC MP Attorney General</u>: 'Open letter of complaint: Re NSW Civil and Administrative Tribunal (NCAT)' provides extensive documentary evidence supporting allegations against University of Sydney and NCAT.

<u>In 2018 the Australian Senate conducted an Inquiry</u>: 'Regulatory approaches to ensure the safety of pet food' that considered aspects of the pet food/vet collusion problem.

March 2023, 'Open Letter To Industrial Pet Food Companies And Their Enablers' quoted 2005 UK Parliament Early Day Motion 1003:

Raw Meaty Bones Group

That this House notes the controversy surrounding the promotion and sale of processed pet foods by veterinary surgeons; acknowledges the evidence and analysis in the book *Raw Meaty Bones* by Tom Lonsdale; commends the UK Raw Meaty Bones Group's public awareness campaign; and calls for a wide ranging inquiry into that group's serious concerns relating to human and pet health, the economy and the environment and the adequacy of the current veterinary regulatory system to investigate these issues.

There is much more information at www.ThePetFoodCon.com and at the YouTube Channel: https://www.youtube.com/channel/UCzZmYoLjxA8bFUepVvHmv_A

Conclusion

I believe that the above-mentioned links, *Multi-Billion-Dollar Pet Food Fraud* and Annexures will help to shed light on the Committee Terms of Reference.

However, I believe a much wider inquiry is needed into matters as they affect the Government of New South Wales including but not limited to its relationship with The Veterinary Practitioners Board of NSW, Australian Veterinary Association, University of Sydney School of Veterinary Science, Small Animal Specialist Hospital (SASH) and animal welfare groups.

I shall be pleased to provide further information as you may require.

Thank you for your consideration.

Yours sincerely,

Tom Lonsdale

CC: Members of the Committee, MPs and other interested parties



[CONTINUED BELOW]

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The Hon. Mark Banasiak, MLC Chair Portfolio Committee No 4 Regional NSW Parliament House Macquarie Street SYDNEY NSW 2000

Annexure A

Inquiry into the veterinary workforce shortage in New South Wales

TERMS OF REFERENCE

That Portfolio Committee 4 – Regional NSW inquire into and report on the veterinary workforce shortage in New South Wales, and in particular:

a.) the shortage of veterinarians across the profession, including clinical (small and large animal practice), government, academia, research, industry and pathology

Workforce shortages and other developments in small animal veterinary practice, as the largest segment of the veterinary profession, have a marked knock-on effect on all other segments.

Increased demand and increased salaries for small animal vets serves to draw practitioners out of other segments. Solving small animal veterinary practitioner problems will inevitably relieve the pressures in other segments.

b.) the challenges in maintaining a sustainable veterinary workforce, including recruitment and retention rates.

There are massive hitherto unacknowledged issues affecting the integrity and thus the sustainability of the veterinary profession. *Multi-Billion-Dollar Pet Food Fraud: Hiding in Plain Sight* deals with the generality of the issues. The book reveals a vacuum in veterinary leadership due to a confluence of many factors. Chapter 12 — Sparking the Revolution, has specific recommendations including for 'Demoralised, disillusioned and dispirited vets', veterinary students, dog bites in children and the brake on vital medical scientific discovery due to the dead hand of the pet food industry/veterinary alliance.

The veterinary profession is predominantly a female activity. Women need to balance the needs of family and workforce. Many women choose to work part time or leave the workforce.

All would-be new recruits should be made aware of the confronting reality described in *Multi-Billion-Dollar Pet Food Fraud*. Fuller objective disclosure and better education is needed to ensure disillusionment does not set in early in the new recruits.

c.) the burn-out and mental health challenges facing the veterinary profession

See *Multi-Billion-Dollar Pet Food Fraud* generally for structural and systemic issues and specifically page 285 'Demoralised, disillusioned and dispirited vets'.

d.) the role of, and challenges affecting, veterinary nurses

Veterinary nurses tend to be subliminally aware of inconsistencies and hypocrisy. However, nurses occupy a subordinate role and consequently cannot hold much sway. As with all members of the veterinary workforce, it's generally after entry into the profession and with experience that the issues come to the fore.

The cost of entry and thus the exit from the profession are considerable. Consequently, many people choose to stay on whilst suffering chronic stress arising from their uncomfortable working life.

e.) the role of, and challenges affecting, overseas trained veterinarians

Besides the obvious cultural and language issues, as for the veterinary nurses, overseas trained veterinarians often are subliminally aware of inconsistencies and hypocrisy in the workplace. However, their hands are also tied, especially due to the costs of entry into the Australian workplace and the further costs should they adopt a critical and thus unpopular stance.

f.) the arrangements and impacts of providing after-hour veterinary services

With the advent of 24-hour centres in the larger cities, the stress of after-hours work is somewhat lessened for general practitioner vets.

Although the 24-hour centres in Sydney take the pressure off general practitioners, the overservicing and prices charged tend to exceed what is perceived as reasonable and thus engenders resentment. In my practice I was grateful that the night work was taken off my hands, but I was protective of my clients who were often subjected to unnecessary costs when simple solutions would have sufficed.

For vets working in rural and isolated areas, the stresses can be considerable with impacts on health and family life. Prior to working in rural and isolated areas veterinary students would be well advised to explore the full range of options. The State Government could consider subsidising rural and isolated veterinary practice. However, I recommend that option only as a last resort after the pet food industry bubble economy is brought under control.

g.) the impact of the current legislative and regulatory framework on veterinarians

Plainly, as highlighted in *Multi-Billion-Dollar Pet Food Fraud*, the Veterinary Practitioners Board, veterinary schools, Department of Agriculture, Australian Veterinary Association and specialist veterinary hospitals command outsize influence.

A separate inquiry is needed to investigate and report on whether the veterinary profession should continue as a self-regulating entity or whether there needs to be closer government oversight or combination thereof.

If, as I suggest, the veterinary profession and pet food industry are involved in a multi-billion-dollar fraud akin to a major international white-collar criminal network, then the Government needs to adopt a forensic outlook when reviewing the legislative and regulatory framework.

Although the veterinary/pet food alliance is egregious and challenging, I believe that existing legislation, for instance the examples below, should suffice on condition that the laws and regulations are enforced.

University of Sydney Act 1989, Sydney University Charter of Academic Freedom, Prevention of Cruelty to Animals Act, Veterinary Practice Act, Truth in Advertising regulations, Laws of obligation, Deception and fraud, Breach of contract, Education Services for Overseas Students Act 2000, Tertiary Education Quality and Standards Agency Act 2011, Trade Practices Act, ICAC Act, National Anti-Corruption Commission Act.

h.) the particular challenges facing the veterinary profession and the shortage of veterinarians in regional, rural and remote New South Wales

Problems in the sector will likely be a recurring theme. However, a leveling can be expected when the shortage and re-skilling of small animal veterinarians is resolved. See Annexure C where the veterinary emphasis has now switched from concerns about overwork to a focus on advertising and finding 'innovative ways . . . to maintain profitability'.

i.) the role played by veterinarians in providing care to lost, stray and homeless animals, injured wildlife and during emergency situations.

As part of the compact with society, it's reasonable for practising veterinarians to assist with stray and homeless animals. However, community attitudes arise in an environment of relentless junk pet food advertising that depicts pets as little more than furry toys that can be acquired and then discarded at will. Owning a dog (modified wolf) or cat (modified desert predator) is seen as a right not a privilege regardless of the financial capability, lifestyle, environment or knowledge base of all members of society. The pet food ads glamourise pets as status symbols and fashion statements with little in the way of maintenance needs except the junk products on the supermarket shelf.

In the event that medical treatment is necessary, then the vet at the end of the street is standing by. And should the pet become inconvenient or too costly, then the municipal pound is always open.

The junk pet food/vet nexus needs to be severed and educational campaigns instituted to overcome 150 years of brainwashing—easier said than done. In the meantime, quick fixes can be applied, but they will only serve to delay a proper overhaul of the arrangements for vets in society.

j.) the impact of the current veterinary shortage on animal welfare, including the impact on the economy, members of the public seeking veterinary care for animals, pounds and shelters, the animal agribusiness industry, companion animal breeders and others

The multiple strands to this question are best answered by reference to *Multi-Billion-Dollar Pet Food Fraud*. The book deals with the real-life endemic animal welfare issues, the effects of the bubble

economy and a range of issues largely resulting from the self-regulating status of the veterinary profession in collusion with the junk pet food industry.

k.) current barriers to accessing veterinary care for members of the public, particularly those with lower incomes or who live in regional, rural and remote locations.

Problems will always be present in those areas. However regulatory overhaul and proper education will help create better understanding and more reasonable expectations.

The false and unrealistic pet food ads and unrealistic celebrity vet programmes create a climate of unrealistic expectations.

A thorough investigation of all interdependent aspects is needed before remedial work is undertaken. Over-hasty responses to this and other questions will only serve to entrench problems still deeper.

l.) strategies to support the current veterinary workforce, as well as ways to increase the number of practising veterinarians particularly in regional, rural and remote New South Wales

Important to avoid temptations to find quick fixes that will only postpone proper resolution. It is vitally important not to indulge the junk pet food/vet collaborators by creating more vet schools. The issues are deserving of full government attention at both state and the federal level with far-reaching inquiries.

Following on from this Upper House Inquiry, I believe a task force should be created under the auspices of a high-ranking judge to evaluate and implement the findings. I must emphasise, that it will be vital that such a task force should, as much as possible, be quarantined from harmful influences and 'regulatory capture'. So-called 'stake holders' will need to be carefully screened. I believe that there are grounds for excluding the pet food industry, Australian Veterinary Association, animal welfare groups and their proxies from any task force.

Skilled administrators and lawyers will be required to advise and administer the task force. Insofar as the existing veterinary workforce is devoted to servicing a population of junk pet food fed pets, that veterinary workforce will need to be retrained and refocused. High on the agenda of the task force will be a community outreach and education campaign.

m.) strategies to improve access to veterinary care for members of the public, particularly those with lower incomes or who live in regional, rural and remote New South Wales.

Improving access to the current distorted 'veterinary care' will only serve to prolong the problems. By the NSW Upper House conducting a robust, open, transparent inquiry the stage can be set for a much-needed revolution in veterinary care not only in NSW but the whole world.

n.) any other related matter.

I note the relatively narrow focus of the current inquiry. Consequently, I believe that whole of State Government and whole of Federal Government inquiries are needed to satisfactorily address the issues as they pertain to education, trade practices, administrative law, animal welfare, agriculture, international trade and other functions.

At core of any such inquiries, questions must be raised regarding the self-regulatory failure of the veterinary profession. New models of veterinary regulation and delivery of veterinary services need to be found.

The current inquiry, by leaving no stone unturned, may point to criminal liability of various entities in respect to animal welfare and consumer fraud. I believe those matters should be referred to the relevant authorities for further investigation and possible prosecution. The NSW State Government should continue to monitor progress.

Signed:

Tom Lonsdale

