

**Submission
No 228**

COMPANION ANIMAL BREEDING PRACTICES IN NEW SOUTH WALES

Organisation: National Animal Rescue Groups of Australia (NARGA) Inc
Name: Ms Jan Bartlett
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To whom it may concern,

I write on behalf of National Animal Rescue Groups of Australia (NARGA) with regard to the current inquiry into companion animal breeding practices in New South Wales. NARGA is an organisation that represents a large number of member rescue groups, providing a voice for an Australia wide network of rescuers, foster careers and volunteers.

In this submission I shall address three main issues:

- the proposal to limit numbers of animals kept by breeders;
- calls to implement a breeders licensing system; and
- the implications of banning the sale of dogs and cats in pet stores.

-Breeding Animal Number Limitation

Whilst it may seem appropriate to set a limit on the numbers of animals kept by breeders, in fact this may do little to improve welfare outcomes for breeding animals. One breeder may be better equipped for and capable of adequately managing ten individual animals, where another may be incapable of caring for five. An arbitrarily set number is not able to adequately determine if a breeder is capable of acting in the interests of their animals welfare needs. However, by limiting numbers the potential for a high volume of offspring is in itself limited. To that end alone, registered breeders should be permitted to keep no more than four breeding females and two breeding males.

A better system may be setting an annual quota on the number of litters legally permitted to be bred in NSW, with breeders applying in advance for a permit to breed a litter.

Further issues arise concerning the retirement of older animals deemed of no further use by the breeder. Along with a limit on numbers must come legal stipulation for an appropriately managed retirement plan, where all animals retired from breeding are accounted for and their best interests protected. This would necessitate the mandatory microchipping of all dogs in breeding facilities, with the identification numbers being registered with an independent regulatory body. Any and all necessary euthanasia must be carried out by a veterinarian and reported to the regulatory body immediately.

-Breeder Licensing System

All breeders should be required to register with an independent regulatory body, with each license requiring a yearly renewal following an inspection of the breeding premises, an audit and the requirement that all animals sold be fully immunised and microchipped.

The licensing body must be wholly independent from any and all interest groups, such as breeder clubs and pet industry lobbyists.

Licenses issued should incur a fee dependent upon the numbers of animals kept by the breeder for the purposes of breeding.

The licensing fee could possibly be decreased as an incentive for breeders to sell only desexed animals.

-Implications of Banning Pet Store Sales

An increasing number of pet stores have already begun the love away from the sale of animals, with many actively supporting animal rescue groups by offering their animals for adoption. This can only be seen as a positive thing, and it removes one facet of market for intensively farmed companion animals, whilst providing broader community coverage for rescue groups and the animals in their care.

As reputable rescues only offer desexed, vaccinated and microchipped animals for adoption, the incidences of "accidental litters" or backyard breeders, the spread of preventable diseases, and the numbers of lost animals unclaimed in shelters would be significantly decreased. Furthermore, the consumer themselves would be protected from purchasing expensive animals with little to no prior vetting, which in many cases has led to purchasers ending up with expensive vet bills and the maintenance of ongoing health conditions.

I have addressed only a few issues here in this submission. But the reality is that the commodification of animals invariably leads to a decrease in concerns for their welfare and best outcomes. It is of our opinion that intensive farming of companion animals is abhorrent, wholly unnecessary and should be banned forthwith. As representatives of so many rescue organisations, we are yearning for the day when common sense and compassion will prevail, alongside educated opinions, with society eventually accepting that the intensive farming of companion animals is simply morally bankrupt.

Regards,

Kristy Alger

NARGA Spokesperson