

**Submission
No 303**

COMPANION ANIMAL BREEDING PRACTICES IN NEW SOUTH WALES

Organisation: Pet Industry Association of Australia
Name: Mr Bob Croucher
Position: President
Date Received: 15/06/2015



15 June 2015

Mr Adam Marshall, MP
Chair
Joint Select Committee on Companion Animal Breeding Practices in New South Wales
Parliament House
Macquarie Street
Sydney NSW 2000

Dear Mr Marshall,

Pet Industry Association of Australia (PIAA) Submission
Companion Animal Breeding Practices in New South Wales

As the peak body for the pet industry in Australia, PIAA represents its members across the entire companion animal industry including pet shops, boarding kennels, grooming parlours, aquariums and other pet services. The Association believes that the welfare of animals is paramount and supports responsible breeders and pet shops who provide high standards of care and prioritise animal health and welfare.

The PIAA demands exacting standards from its members in the care, management and trade in companion animals. All Association members must comply with the PIAA National Code of Practice and Code of Ethics and the Standards and Guidelines for Best Practice. These documents define quality standards for the operation of businesses beyond current regulatory requirements.

The following major points are highlighted below and discussed in detail in the attached submission:

1. The PIAA totally rejects any form of animal cruelty and does not condone puppy farms or breeders who undertake intense breeding practices and poor animal welfare.
2. The PIAA does not condone puppy farms and strongly agrees with the RSPCA's definition that a puppy farm is "an intensive dog breeding facility that is operated under inadequate conditions that fail to meet the dogs' behavioural, social and/or physiological needs".
3. The PIAA will work tirelessly with breeders and pet stores to ensure that NO animals bred in puppy farms will be sold in pet stores.

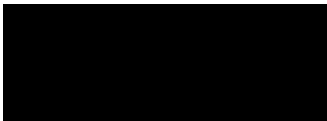
Pet Industry Association of Australia Ltd.
Ph: +61 2 9659 5811 Fx: +61 2 9659 5822
PO Box 7108, Baulkham Hills Business Centre NSW 2153
info@piaa.net.au www.piaa.net.au
ABN 47 001 782 770

4. The PIAA believes that ALL dog breeders should be licensed. The Association has developed a Model Dog Breeder Licensing System which is 'self-funding'. The model is outlined in detail in the PIAA Recommendations and Summary document attached to this submission.
5. The PIAA believes all pet stores who sell livestock should be licensed under a 'self-funding' scheme. This licence in is addition to their Business Registration.

Our Association welcomes this Parliamentary Enquiry and look forward to it achieving its objectives which will lead to the eradication of "puppy farms". We do not believe that banning the sale of dogs and cats in pet stores will improve animal welfare outcomes in NSW, rather we believe that such a decision may have the opposite effect, making the underground market larger for unscrupulous breeders. Pet stores and breeding establishments in NSW are already regulated and required to comply with legislation and codes of practice. This would be strengthened further by the implementation of a breeder licensing system and a pet store licensing system.

We would welcome the opportunity to discuss our submission in more detail with the Joint Selection Committee, in the meantime should you require any further information please do not hesitate to contact us.

Yours faithfully



Bob Croucher
President
Pet Industry Association of Australia



Pet Industry Association of Australia (PIAA) Submission

Companion Animal Breeding Practices in New South Wales

In response to the call for submissions from the Joint Select Committee regarding the Companion Animal Breeding Practices in New South Wales, the PIAA submits the following comments in line with the Terms of Reference:

(A)

'THE CURRENT SITUATION IN NEW SOUTH WALES IN COMPARISON WITH OTHER JURISDICTIONS'

NEW SOUTH WALES

Like all states and Territories, puppies and kittens can be sold either privately, in a minimally regulated manner, or via pet stores in a highly regulated and transparent manner. Pet stores in NSW are regulated by the following legislation and codes of practice:

Legislation

- Prevention of Cruelty to Animals Act 1979 and Regulations 2012
- Prevention of Cruelty to Animals (Animal Trades) 1996
- Companion Animals Act 1998 and Regulations 1999

Codes of Practice

- Animals in Pet Shops 2008 (summary below)
- Breeding Dogs and Cats 2009

PIAA National Code of Practice 2015

PIAA Standards & Guidelines for Best Practice in Retail Stores 2015

PIAA Standards & Guidelines for Best Practice in Breeding Establishments 2015

PIAA Dogs Lifetime Guarantee Policy on Re-homing & Traceability Program 2013 – Launched in 2013

NSW Animal Welfare Code of Practice – Animals in Pet Shop 2008

The Code requires pet stores to:

- **Maintain appropriate records.** (This information must be readily available to inspectors from the Department of Primary Industries, RSPCA and Animal Welfare League NSW if requested).
- **All animals sold must attain the minimum age** - Dogs 8 weeks of age and cats 8 weeks of age.

- **Transfer of ownership/sale** - Records kept must include the name, address and contact details of the new owner, transfer of microchip details and advice on registration.
- **Accurate written information on the care of the animal purchased** – must be given to the new owner at point of sale.
- **Promote responsible pet ownership.**
- **Ensure people less than 18 years of age are not sold dogs and cats.**
- **Display of Written Guarantee** - Pet stores must prominently display the store's guarantee outlining the conditions of sale and return policy.
- **Return Policy** – The Code outlines conditions for the return of an animal for whatever reason.
- **Environment** - The Code sets out standards which must be complied to regarding animal housing, hygiene, exercise and enrichment, health checks, veterinary care and euthanasia.
- **Species Knowledge** – The proprietor and staff have extensive experience in caring for the animals in their care thus ensuring that they match the animal with the new owner's lifestyle and commitments without prejudice to any particular breed or species.
- **After Sales Service** - Pet stores offer a vast range of after sale support, products and services to new owners thus ensuring the best animal welfare outcome for the animal
- **Consumer Legislation** - Consumers are afforded support under NSW Consumer legislation.

NSW Companion Animals Act 1988

- **Microchipping** - All dogs and cats, other than exempt cats and dogs, must be microchipped by 12 weeks of age or before being sold or given away whichever happens first. The microchip will be registered on the NSW Companion Animal Register (CAR) managed by the NSW Office of Local Government.
- **Registration** - All cats and dogs, other than exempt cats and dogs, must be registered by six months of age. Registration covers the cat or dog for its lifetime in NSW, regardless of any changes in ownership.
- **Lifetime Registration** - As the registration is for the lifetime of the animal, there is no mechanism within the CAR to remind owners to change their addresses when they move house or State or to remove deceased animals. As such the number of dogs and cats registered in NSW far exceeds the real number of animals that are actually owned.

PIAA National Code of Practice and PIAA Standards & Guidelines for Best Practice

The Pet Association of Australia (PIAA) is the peak body representing the pet industry in Australia. This Code outlines the principles that all members of the Association must use. By adhering to this Code, people involved in the industry are demonstrating to the general community their concern for the welfare, care and management of all companion animals.

This Code outlines the Vision, Mission and Objects of the Association and incorporates the Member Code of Practice, the Member Code of Ethics and the Standards & Guidelines for Best Practice for all sectors of the pet industry. It is a requirement of membership to agree to and comply with the PIAA Code of Practice and Standards & Guidelines for Best Practice.

Standards & Guidelines for Best Practice for all sectors of the pet industry include but are not limited to retail, grooming, breeding, boarding and doggy day care, training, pet services and suppliers. Pet

services include pet sitting and dog walkers, in home services and grooming includes dog wash services.

It is also a requirement that members who sell dogs and puppies agree to comply with the PIAA Dogs Lifetime Guarantee Policy on Traceability and Re-homing. Membership is conditional on this agreement and failure to do so will result in the cancellation of membership.

Members of the Association must comply with all relevant Federal, State and Territory Legislation and/or Codes of Practice in relation to their business operations. In the absence of Legislation or a Code of Practice in the member's State or Territory, it is a requirement that the member complies with the Association's Code of Practice and Standards and Guidelines for Best Practice.

PIAA Standards & Guidelines for Best Practice in Retail Stores

The PIAA Standards & Guidelines in Retail Stores set the standard of care and management of all species kept in retail stores for the purpose of sale. Compliance with the Standards will ensure the care, management and welfare of all species kept is of the highest calibre.

All State, Territory, Local and Commonwealth Legislation and Codes of Practice must be complied with by Retail Stores in their respective State or Territory.

Species may include but are not limited to:

- Dogs and puppies, cats and kittens, guinea pigs, rabbits, ferrets, rats and mice, fish and aquatic animals, amphibians, birds, poultry, insects, native mammals and livestock kept as pets.

The sale or keeping of an animal or animals in the following circumstances are governed by local, state or commonwealth legislation and/or codes of practice and therefore may be exempt from some requirements of the PIAA standards. Operators of such businesses should make themselves aware of any legislations or codes of practice relevant to the keeping of these animals.

- Where the animal is part of a competitive display of domestic farm animals.
- Where the animal is sold or offered for sale in the course of carrying on the business of animal research, or in the course of carrying out animal research, without contravening relevant State or Commonwealth Legislation.
- Where the animal is a domestic farm animal intended for commercial use as part of a farming enterprise.
- Where the animal is at an agricultural show or show parade such as those conducted by a member of an Agricultural Society.
- Where the animal is kept by an agricultural college or school.
- Where the animal is a fish that is kept at a fish hatchery, or a fish farm for the purpose of commercial food production, or re-stocking of lakes, dams or waterways.
- Where the animal is a lawful captive

PIAA Standards & Guidelines for Best Practice in Breeding Establishments

The purpose of the Standards & Guidelines for Best Practice in Breeding Establishments is to specify the minimum standards that are appropriate to the physical and behavioural needs of dogs and cats housed in PIAA member businesses operating as breeding or rearing domestic animal businesses.

The PIAA Standards & Guidelines for Best Practice set the standard for the care and management of all dogs and cats in breeding establishments. Compliance with the standards will ensure the care, management and welfare of all species bred is of the highest calibre.

All state and territory, local, state and commonwealth legislation and codes of practice must be complied with by breeding establishments in the respective state or territory.

Species include: Dogs, Puppies, Cats and Kittens

Pet Industry Association of Australia (PIAA) Dogs Lifetime Guarantee Policy on Re-Homing & Traceability Program

As the peak body for the pet industry in Australia, the Pet Industry Association of Australia (PIAA) believes that the welfare of animals is paramount. The PIAA supports responsible breeders who provide high standards of care and prioritise animal health and welfare.

The PIAA does not condone puppy farms, and supports the RSPCA's definition: a puppy farm is "an intensive dog breeding facility that is operated under inadequate conditions that fail to meet the dogs' behavioural, social and/or physiological needs".

The PIAA demands exacting standards from members in the care, management and trade in companion animals. All PIAA members must comply with PIAA National Code of Practice and Code of Ethics that define quality standards for the operation of businesses beyond current regulatory requirements.

As a sales channel, pet retail stores account for only 15% of animal sales each year (*PIAA research 2013*) however, the PIAA believes the pet retail industry can be an agent for positive change.

The PIAA Dogs Lifetime Guarantee Policy on Dog Traceability & Re-Homing guarantees that:

- Dogs purchased from PIAA member retail stores are sourced from responsible breeders whose operations are subject to independent audit each year.
- Any dog purchased from a PIAA member that becomes unwanted or abandoned at any age is re-homed.

The PIAA Dogs Lifetime Guarantee Policy on Dog Traceability & Re-Homing means consumers can purchase with confidence from a PIAA member retail store, knowing that their dog is not the product of a puppy farm and that should the dog become unwanted at any point in its lifetime, PIAA will ensure the dog is re-homed.

OTHER JURISDICTIONS

Laws relating to the sale of cats and dogs in pet stores and breeding establishments in other Australian states and territories vary considerably with some having little or no laws or codes of practice at all. The current laws and regulations in other states and territories are listed below.

ACT

Legislation

- Domestic Animals Act 2000 and Regulations 2001
- Animal Welfare Act 1992 and Regulations 2001

Codes of Practice

- Animal Welfare (Animals in Pet Shops)
- Welfare of Cats
- Welfare of Dogs
- Sale of Animals in the ACT 2013

Record Keeping and Guarantee – The records that must be kept are listed in the Sale of Animals in ACT Code of Practice 2013.

Registration for Dogs – Lifetime registration for dogs. It is compulsory for all dogs in ACT over the age of 8 weeks of age to be registered when they have been kept in the ACT for 28 days or more and the dog's keeper has been a resident of the ACT for 28 days or more.

Registration for Cats – Cats are not required to be registered.

De-sexing Dogs – It is a strict liability offence under the *Domestic Animals Act 2000* to own a dog which has not been de-sexed. Exemptions include:

- The dog is less than 6 months old
- The dog was born before 21 June 2001; or
- The keeper of the dog holds a sexually entire permit issued by the Registrar of Domestic Animal Services

De-sexing Cats – It is a strict liability offence under the *Domestic Animals Act 2000* to own a sexually entire cat. Exemptions include:

- The cat is less than 3 months old
- The cat was born before 21 June 2001; or.
- The keeper of the cat holds a sexually entire permit issued by the Registrar of Domestic Animal Services.

Microchipping - Mandatory for cats and dogs prior to sale/transfer and by 12 weeks of age.

Licensing to Keep Multiple Cats – Persons wishing to keep 4 or more cats must have a multiple cats licence issued by the Registrar of Domestic Animal Services.

Licensing to Keep Multiple Dogs – Persons wishing to keep 4 or more dogs must have a multiple dogs license issued by the Registrar of Domestic Animal Services.

PIAA National Code of Practice 2015

PIAA Standards & Guidelines for Best Practice in Retail Stores 2015

PIAA Standards & Guidelines for Best Practice in Breeding Establishments 2015

PIAA Dogs Lifetime Guarantee Policy on Re-homing & Traceability Program 2013

NORTHERN TERRITORY

Legislation

- Animal Welfare Act 2002

Codes of Practice

- There are no Codes of Practice in Northern Territory however the Act provides for codes to be prepared.
- Darwin Animal Management Program requires all dogs to be microchipped, registered and de-sexed.

Registration – All dogs that are over 3 months of age that have been in Darwin for 1 month must be registered annually.

Microchipping – All dogs living in Darwin must have an approved, permanent microchip (or electronic subcutaneous device) as a condition of registration.

PIAA National Code of Practice 2015

PIAA Standards & Guidelines for Best Practice in Retail Stores 2015

PIAA Standards & Guidelines for Best Practice in Breeding Establishments 2015s

PIAA Dogs Lifetime Guarantee Policy on Re-homing & Traceability Program 2013 – Not yet launched

QUEENSLAND

Legislation

- Animal Care and Protection Act 2001
- Animal Management (Cats and Dogs) Act 2008
- Local Laws and City of Brisbane Animals Local Law 2003

Codes of Practice

- Queensland Code of Practice for Pet Shops 2008
- Gold Coast Breeder Code of Practice – if you breed or intend to breed your cat or dog, you are required to obtain a breeder permit from City of Gold Coast and comply with the Breeder Code of Practice

Registration – All dogs must be registered with the local council, before they are 12 weeks old and within 14 days after moving to a new local council area. Cats must be registered in some local council areas.

Microchipping – All dogs and cats born after 10 April 2009 must be microchipped before they are sold or given away. All regulated dogs must be microchipped regardless of when they were born.

PIAA National Code of Practice 2015

PIAA Standards & Guidelines for Best Practice in Retail Stores 2015

PIAA Standards & Guidelines for Best Practice in Breeding Establishments 2015

PIAA Dogs Lifetime Guarantee Policy on Re-homing & Traceability Program 2013 – Launched in Queensland

SOUTH AUSTRALIA

Legislation

- Prevention of Cruelty to Animals Act 1985
- Dog and Cat Management Act 1995 and Regulations 1995

Codes of Practice

- Care and Management of Animals in the Pet Trade
- Management of Companion Animals in Shelters and Pounds

Record Keeping and Guarantee – Will be outlined in new legislation currently out for consultation.

Registration – All dogs over 3 months of age must be registered annually and within 14 days of taking possession of the animal.

Microchipping – New legislation to make microchipping of dogs and cats is currently out for consultation.

Breeder Registration – No, new legislation is currently out for consultation which will require all breeders of dogs and cats to be registered.

No currently – New Legislation and Code of Practice in consultation phase.

PIAA National Code of Practice 2015

PIAA Standards & Guidelines for Best Practice in Retail Stores 2015

PIAA Standards & Guidelines for Best Practice in Breeding Establishments 2015

PIAA Dogs Lifetime Guarantee Policy on Re-homing & Traceability Program 2013 – Not yet launched.

TASMANIA

Legislation

- Animal Welfare Act 1992 and Regulations 2001
- Domestic Animals Act 2000 and Regulations 2001
- Dog Control Act 2000 and Amendment 2009
- Cat Management Act 2009

Guidelines

- Animal Welfare Guidelines for Breeding Dogs January 2012

Record Keeping and Guarantee – Outlined in the Guidelines for Breeding Dogs.

Registration – The owner of a dog that is over the age of 6 months must register the dog.

Microchipping – All dogs over 6 months of age must be microchipped.

PIAA National Code of Practice 2015

PIAA Standards & Guidelines for Best Practice in Retail Stores 2015

PIAA Standards & Guidelines for Best Practice in Breeding Establishments 2015s

PIAA Dogs Lifetime Guarantee Policy on Re-homing & Traceability Program 2013 – Not yet launched.

VICTORIA

Legislation

- Domestic Animals Act 1994 and Regulations 2005
- Prevention of Cruelty to Animals Act 1986 and Regulations 1997

Codes of Practice

Operation of Pet Shops

- Management of Dogs & Cats in Shelters & Pounds
- Breeding and Rearing Establishments (amendments 2015)

Record Keeping and Guarantee – included in Pet Shop Code and Breeding and Rearing Code.

Registration – Mandatory registration for cats and dogs once the animal is 3 months old. A condition of registration is that the cat or dog must be microchipped.

Microchipping - Mandatory microchipping of cats and dogs by 6 months of age, however, the requirement to microchip prior to sale/transfer only applies to 'domestic animal businesses'. An animal's microchip number to be displayed in any advertisement for the animal but not at the point of sale. If the seller is a 'domestic animal business' the breeder must display the microchip number or the breeder registration number and the name of the issuing Council.

PIAA National Code of Practice 2015

PIAA Standards & Guidelines for Best Practice in Retail Stores 2015

PIAA Standards & Guidelines for Best Practice in Breeding Establishments 2015s

PIAA Dogs Lifetime Guarantee Policy on Re-homing & Traceability Program 2013 – Not yet launched.

WESTERN AUSTRALIA

Legislation

- Dog Act 1976
- Cat Act 2011

Codes of Practice

- There are no codes of practice for dogs and cats and breeding for dogs and cats. The following details are taken from the Dog Act and the Cat Act.

Registration – All dogs and cats must be registered annually or when a change of ownership occurs. Registration for dogs can be annual, 3 year or lifetime.

Microchipping – All dogs that have reached the age of 3 months of age must be microchipped and cats must be microchipped prior to transfer/sale and by the age of 6 months of age.

Sale of Cats by Pet Shops – When a cat is sold or given away the pet shop owner must ensure the cat is microchipped and sterilised prior to transfer. Where a cat cannot be sterilised due to its health or age, the pet shop must issue a prepaid sterilisation voucher to the new owner to have the cat sterilised at a later date.

Breeding Cats – As from 1 November 2013, all domestic cats in Western Australia, over six months of age, must be sterilised, microchipped and registered with their local government. A person must not breed cats unless the person is an approved cat breeder.

Cat Breeding – Even if you wish to only breed one litter from your cat you are considered a cat breeder.

Approved Cat Breeder – An approved cat breeder must have a certificate issued by their relevant local government. Pet shops should sight and keep a copy of an approved cat breeder's certificate prior to the sale of an unsterilized cat.

PIAA National Code of Practice 2015

PIAA Standards & Guidelines for Best Practice in Retail Stores 2015

PIAA Standards & Guidelines for Best Practice in Breeding Establishments 2015s

PIAA Dogs Lifetime Guarantee Policy on Re-homing & Traceability Program 2013 – Not yet launched.

(B)

PROPOSALS TO LIMIT THE NUMBER OF ANIMALS ALLOWED TO BE KEPT BY BREEDERS

The PIAA agrees with the definition of a 'puppy farm' as defined by the RSPCA -

"An intensive dog breeding facility that is operated under inadequate conditions that fail to meet the dogs' behavioural, social and/or physiological needs".

The PIAA also believes that equivalent legislation should apply to cats.

The PIAA believes that a ratio of animals to animal carers should be implemented.

The PIAA believes that it is possible to have a large breeding establishment providing the environmental, social, physical and psychological needs of the animals are met.

The PIAA believes that the number of animals kept is not the issue, but rather the unethical breeding and treatment of animals which may occur with any number of animals kept.

The PIAA believes that larger breeding establishments should have more frequent inspections.

(C)

CALLS TO IMPLEMENT A BREEDER'S LICENSING SYSTEM

PIAA strongly believes a Dog Breeders' licensing system must be developed in NSW.

In NSW there is difficulty in inspecting and enforcing the Code of Practice for Breeding Cats and Dogs due to insufficient resources available to the enforcement agencies. Further difficulties are experienced by the lack of knowledge of the whereabouts of all breeders in NSW. A breeder licensing system will ensure that all breeders can be located by their licence number and make it illegal to sell offspring without a licence number.

The Dog Breeder's licensing system should be self-funding and require an independent audit carried out by an inspector from one to the enforcement agencies. The Dog Breeder licensing system should apply to all breeders of cats and dogs, including pure breeds, cross breeds and accidental litters. A model breeder licensing system is referenced in detail in the accompanying document recommendations and summary.

The RSPCA Australia Discussion Paper – Puppy Farms, January 2010, states "Puppy farms produce and sell all types and breeds of dogs, including purebred, crossbred or mixed-bred dogs. Thus buying a 'pure bred' dog is no guarantee that it has not come from a puppy farm. Buying a puppy from a *registered pedigree breeder*' (i.e. a member of a kennel association such as the Canine Control Council Queensland, Dogs NSW or Dogs Victoria) reduces the risk of supporting puppy farms as the majority of such breeders are relatively small scale, sole operators who breed dogs for the purpose of showing and selling and who have an established and efficient system of care and husbandry for their dogs. However, there is no absolute guarantee that '*registered pedigree*' puppies have not come from a puppy farm. Under current regulations, the only way for a buyer to know for sure is to visit the place in which the puppies were bred."

(D)

THE IMPLICATIONS OF BANNING THE SALE OF DOGS AND CATS IN PET STORES

Online Sales - The current online system allows for advertisements of animals for sale are permitted without any documentation or audit trail back to the breeder and no return guarantee. In banning the sale of dogs and cats in pet stores, consumers who have traditionally purchased their dogs and cats from pet store will turn their search for an animal to online advertisements and this will only increase the already high number of online sales. The current online system discourages transparency as purchasers are often required to pick up the animal in a car park, or at another venue away from the breeder's premises. This means the new owner never sees the breeder's premises nor the conditions in which the puppies have been bred. New owners are easily 'scammed' when buying animals from some indiscriminate breeders who advertise online.

Statistically online sales are far greater than pet store sales and it is well known throughout the industry that online sales are the main cause of the puppy farm issue, as the puppy farms deal direct with the public. This is detailed in the PIAA Dogs Lifetime Guarantee Policy on Re-homing & Traceability Program 2013.

Pet Stores are a First Point of Call - Traditionally the local pet store is the first point call for potential pet owners when considering what pet is more suited to them and their circumstances. New owners will no longer have this choice of pets available to make an informed decision as some breeders have a bias towards their own breed. Pet stores can offer different breeds or alternatively another species as a companion animal.

Welfare - There will be significant welfare implications as the market for selling puppies will be forced out of the public gaze. Most stores are open to the public seven days a week allowing constant viewing by the public. Breeders who sell direct to the public do not have this constant scrutiny.

Employment – The opportunity for people to be employed in pet stores would be greatly reduced, many pet stores would be forced to close. Traditionally pet stores have been an excellent entry level for those wishing to work with animals.

Routine Visits to Pet Stores - The vast majority of the public love their routine visits to pet stores to see the animals - banning the sale of puppies and kittens from pet stores, is not in the public interest. For some community members it is the only opportunity for they have to physically relate to animals and most enjoy the experience of visiting the store on a regular basis.

Stopping the Sale Kittens - Eliminating kittens from pet stores will create pressure on pounds, rescue groups and welfare agencies as thousands of kittens are surrendered to pet stores every cat breeding season. This is in addition to the current number of kittens being abandoned or surrendered and then re-homed by shelters, pounds and rescue organisations.

Pet Stores in NSW are Already Regulated - Currently pet stores are well regulated by legislation and the NSW Code of Practice for Animals in Pet Shops. A tracking system already in place, allows for dogs and cats sold in pet stores to be traced back to the breeder. Banning dogs and cats in the pet

stores will force consumers to look elsewhere and in many instances it will increase the number of animals sold online making it impossible to trace these animals back to the breeder. Pet stores are also required to give written information to the purchaser at the point of sale regarding the breed of animal purchased and the traits of the breed together with care instructions for the animal.

Training Students - Pet stores currently assist in the training of students undertaking their Certificate III in animal studies. Students are required to undertake a certain amount of hours of work experience each week in a pet store, shelter or veterinary clinic. The number of students undertaking these courses is increasing and they will find it more difficult to undertake their work experience if they can no longer use pet stores as a source of training.

Accessible After Sales Service – Many consumers develop a level of trust with their pet store. They successfully purchase an animal from the store however the relationship does not end there. The after sales service provided by the pet store is invaluable for the pet owner and they can use their pet store as a means of obtaining advice caring for their animal. Stores can advise the purchaser of the importance of having a good relationship with a local veterinarian if they don't already have one. Ongoing advice can be sought on puppy training and care and health of the animal as it grows.

Reduced GST Collection - GST is applicable to all sales in a pet shops including livestock.

(E)

ANY LEGISLATION CHANGES THAT MAY BE REQUIRED

A licensing system for pet stores to sell livestock.

A licensing system for all breeders and breeding establishments. A model system is outlined in the attached PIAA Document - Recommendations & Summary.

PIAA believes legislation should be put place to ensure that all local government has consistent regulations for companion animals.

Legislation that requires all online and print advertisements for dogs and cats for sale to include the breeder's licence number and the microchip number of the animal.

All kittens sold in pet shops must be either de-sexed prior to sale or the new owner must purchase a de-sexing voucher to be used within 6 months. This is intended to curb the number of unwanted cats and kittens in shelters, pounds and rescue organisations and to reduce the number of feral cats who currently have a huge impact on the environment.

PIAA believes that Section (10) Sale of Animals, Guideline 10.2.1 of the NSW Animal Welfare Code of Practice – Animals in Pet Shop 2008 should be a Standard and not a Guideline.

Licensing systems should be enforced by welfare agencies and funded by licence fees.

(F)

ANY OTHER RELATED MATTER

A more efficient system needs to be in place to improve the collection of statistics for dogs and cats in NSW. Currently dog and cat registrations are entered onto the Companion Animal Register (CAR) and the animal is registered for life. Since the change from annual registrations to lifetime registrations, the number of dogs on the register has increased dramatically. This can be attributed to the fact that on the old system of annual registrations, dog owners were sent a reminder notice to renew their pet's registration which does not occur with lifetime registration. This renewal notice prompted the owner to change their details when they moved house or when an animal died. The CAR statistics on the number of dogs registered in NSW is now skewed as there would be a large number of 'deceased' dogs remaining on the register.



Pet Industry Association of Australia (PIAA) Submission

Companion Animal Breeding Practices in New South Wales

PIAA Recommendations & Summary

In summary the PIAA recommends the following points for consideration by the Committee:

Recommendation 1:

All pet stores are licensed annually

There are many best practice pet stores who understand that good animal welfare and management equals long term business success. This can be seen in other industries who are slowly improving their welfare practices to adapt to changing community expectations on animal welfare. Free range meat and eggs are an example of this.

An effective way of speeding up this process and ensuring compliance is to require all pet stores who sell livestock (including fish) to be licensed.

The licensing system would be self-funding and independently audited by the enforcement agencies. These organisations would then apply for a licence using a number rating system e.g.:

- Class 1 Licence Rating allows the sale of all livestock, whereas
- A Class 4 Licence Rating allows for the sale of fish only

A system such as this would provide confidence and clarity for potential owners and provide resources to ensure compliance of the already strong code of practice in this state.

Recommendation 2:

All breeders to be licensed to ensure compliance with current code of practice

The NSW Code of Practice for Breeding Cats and Dogs is one of the strongest breeding codes in Australia. A lack of enforcement resources means the enforcement agency inspectors only enforce the code reactively when a complaint is lodged, rather than proactively visiting premises on a regular basis. An audited licensing system would ensure breeders comply with the code and the welfare of the animals is the priority.

The following proposed model for a Breeder Licensing System has been developed by PIAA. This model has been designed for dogs however a model could be designed to accommodate cats if required.

PIAA MODEL DOG BREEDER LICENSING SYSTEM

AIM:

To identify all dog breeders in NSW.

To ensure that all breeders maintain the minimum standards required in the Code of Practice for Breeding Cats and Dogs

OVERVIEW:

Currently there is no way of identifying where dogs are bred in NSW, nor the conditions under which the breeding dogs are kept. Enforcement agencies are often only alerted to breeders when a complaint is made.

ASSUMPTIONS:

The current system has no way of knowing how many individual breeders there are in NSW. Assumptions made when designing this model have been based on current statistics however, the purpose of developing the model is to ensure that this system can be a self-funding. For the purpose of this model the following assumptions have been made:

- An average litter of puppies is 6
- Matings are performed once per year
- Matings are successful each time

No. Breeding Bitches	No. of Breeders	Puppies Per Year
1 – 5 bitches	3,000	54,000 (3 x 6 x 3,000) 3 av. of 1 and 5
6 - 25 bitches	500	46,500 (15.5 x 6 x 500)
6 - 50 bitches	100	22,800 (38 x 6 x 100)
51+ bitches	25	15,000 (100 x 6 x 25)
Total	7250	138,300

If this assumption is correct, and dogs live for an average for 10 years, the dog population would be estimated at 1.4 million in NSW, which PIAA believes would be an accurate estimation.

OBTAINING A LICENCE:

- The breeder would contact an enforcement agency to arrange for their establishment to be inspected prior to issues of a licence.
- Breeders with 1-5 breeding bitches would be required to be inspected every 2 years.
- Breeders with 6-25 breeding bitches would be required to be inspected once a year.
- Breeders with 26-50 breeding bitches would be required to be inspected every 6 months.
- Breeders with 51+ breeding bitches would be required to be inspected every 3 months.

This would equate to 2300 inspections per year.

REQUIREMENTS FOR BREEDERS TO OBTAIN A LICENCE:

- A current breeder's licence must be held to allow the breeder to sell a dog.
- The breeder's licence number must be included in any advertisement for sale of an animal. This may include a private sale, a sale on-line, a sale through a pet store or when given away.
- A breeder registration portal would be developed. The portal would only disclose information related to the currency of the breeder's licence. No other information would be available due to privacy legislation.
- Breeders who sell animals without a current licence would incur a fine and possible deregistration.

WHAT ARE THE COST IMPLICATIONS FOR THE ENFORCEMENT AGENCIES?

- This model assumes that an average of 2 inspections would be performed each day. On the premise that an inspector works for 230 days per year, they would be able to perform 460 inspections per annum. This would require the employment of 5 inspectors dedicated to undertaking breeder establishment inspections.
- This model assumes approximate expenses to maintain 1 inspector per year would be in the vicinity of \$110,000 (package would include a salary of \$75,000, fully maintained vehicle and travel expenses).
- Based on the above costings it is estimated to cost \$550,000 per annum to employ 5 inspectors.

BREEDER LICENSING FEE STRUCTURE:

No Breeding Bitches	Licence Period	Annual Revenue
1 – 5 Bitches	\$150 (2 year licence)	\$225,000.00
6 - 25 bitches	\$400 (1 year licence)	\$200,000.00
26 - 50 bitches	\$900 (1 year licence)	\$ 90,000.00
51+ bitches	\$2,000 (1 year licence)	\$ 50,000.00
Total Annual Revenue		\$565,000.00

CONCLUSION:

The assumptions PIAA has made in assessing the above calculations may not be truly accurate however, the model shows that it is feasible for a self-funding breeder licencing system to be achieved.

In the event that the number of breeders were to increase, the system would allow for the number of inspectors to increase accordingly thus allowing the system to continue to be self-funding. Alternatively, the fee structure can be adjusted to ensure the system remains self-funding.

Recommendation 3:

Better data collection – Factual and meaningful statistics

One of the greatest challenges currently facing the companion animal industry is the lack of a consistent and meaningful system for the collection of statistics for cats and dogs across Australia. Currently local government pounds and shelters, animal welfare shelters and rescue organisations keep records of the animals that come in and out of their care however, the statistics kept by each organisation are not consistent. Information kept in regard to age, breed, distinguishing marks etc. vary widely from organisation to organisation. Most keep information such as sex, estimated age, estimated breed (cross breed dogs are usually an observation made by staff) and markings, colour etc.

The PIAA believes a more simplified and consistent system for the collection of statistics should be developed. An example of a simplified system would be as follows:

- Each pound, shelter and rescue organisation would be required to collect the same information for each dog and each cat.
- No more than six or seven categories of information would be collected.
- Each organisation would be required to collect the same categories of information
- Suggested types of information that should be collected:

Sex

Colour

Estimated age

Distinguishing marks

Microchipped yes/no

De-sexed/entire

Information on where the dog was purchased/bred (if known) e.g. registered breeder, shelter, pet store, online.

- These statistics would be totalled and reported monthly and annually.
- Any other information may be kept by the individual organisations but not included in the monthly or annual statistic report.

This simplified system would ensure the accurate reporting by all agencies and give consistent and accurate statistics available for collection for the entire state. The system could easily be implemented by other states and agencies allowing for collection of accurate national statistics.

The collection of the statistics would be reported on a central portal and used to give accurate statistics for the whole nation thus allowing a better understanding of the number of cats and dogs in each state and where they are being acquired.

Recommendation 4:

Sale of dogs and cats must be effected face to face in the pet store

PIAA recommends that there should be a requirement for all puppies and kittens sold in NSW pet stores to only be sold to the consumer face-to-face in the pet store. This would allow the pet store staff to assist the prospective new owner in choosing the right animal for their lifestyle and to educate them in the correct way to care for their animal. It would also allow the staff to ensure that the animal is not being purchased by a person who is underage or that they have the required approval to purchase the animal from their parent or guardian.

Media Release

www.adelaide.edu.au/news

Thursday 22 May 2014

How healthy is that puppy on the website?

Many people looking for a new puppy for the family are buying them online – with significant potential risk of future health and behavioural problems with their dogs, according to University of Adelaide research.

Supported by the Dog and Cat Management Board, the research has found that puppies less than one year old are commonly sold online for as much as \$3600 but the advertisements often gave no information about vaccination, health and microchip status.

"In the last five years there has been a rapid increase in online sales of puppies in Australia," says Dr Susan Hazel, Senior Lecturer at the University's School of Animal and Veterinary Sciences. "Although there are many reputable dog breeders advertising online, there are risks to online sales of puppies and the public needs to be aware.

"Poor breeding lines or an inappropriate early environment can lead to ongoing health and behavioural problems in adult dogs. At best these can reduce quality of life for the dogs and their owners, at worst the dogs may be sent to a shelter where they may be euthanased," says Dr Hazel who is presenting the research at next week's Australian Veterinary Association Annual Conference at the Perth Convention Centre.

The study included surveys of puppy owners attending puppy or obedience classes about the source of their puppies. Advertisements on two of the most popular online websites for sales, Gumtree and Trading Post, were then analysed from December 2013 to February 2014.

Of those surveyed, 29% sourced their puppies online, 44% of people found their puppy directly through a breeder, 8% found their puppy through a friend or family and 5% from a pet shop. "It's possible that in the overall community online purchase of puppies will be even higher but that research still needs to be done," says Dr Hazel.

On Gumtree (gumtree.com.au) there is a policy that all pups for sale should be vaccinated, vet checked and microchipped, but the majority of ads did not contain this information. A higher proportion of those on Trading Post (tradingpost.com.au) did contain this information, although many still did not.

Dog and Cat Management Board Chair Jan Connolly says people must do their research before buying a puppy.

"Dogs are a long-term commitment," Mrs Connolly says. "It's important that potential dog owners take time to research breeds and choose a pet that fits in with their lifestyle. The Select-a-Pet program, available at dogandcatboard.com, can help with making this choice. Once you have chosen a breed and found a puppy that suits you, go to the breeding facility and make sure that it is clean and well run. You should be able to handle the puppies and see the temperament of the mother.

"Then when you bring the dog home, it is very important to ensure they are trained, socialised and desexed to reduce the risk of attacks in the community."

Media Contacts:

Dr Susan Hazel

Senior Lecturer

School of Animal and Veterinary Sciences

The University of Adelaide

Phone: +61 8313 7828

Mobile: +61 402 325 876

susan.hazel@adelaide.edu.au

Georgia Gowing

Senior Media Adviser

Department of Environment, Water and

Natural Resources

Mobile: +61 467 795 640

georgia.gowing@sa.gov.au

Robyn Mills

Media and Communications Officer

The University of Adelaide

Phone: +61 8 8313 6341

Mobile: +61 410 689 084

robyn.mills@adelaide.edu.au