

**Submission  
No 274**

## **COMPANION ANIMAL BREEDING PRACTICES IN NEW SOUTH WALES**

Name: Name Suppressed  
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*Partially Confidential*

## SUBMISSION TO JOINT SELECT COMMITTEE ON COMPANION ANIMAL BREEDING PRACTICES IN NEW SOUTH WALES.

The current situation in New South Wales in comparison with other jurisdictions.

The NSW DPI Animal Welfare Code of Practice Animals in Pet Shops is a comprehensive, well written, easily enforceable Code of Practice when compared to similar codes in other states. It gives adequate minimum standards in the most part for cats and dogs. However some modifications can bring the code up to modern community expectations. These modifications are as follows:

3.2.6 Market - It needs to be removed that animals can be sold "at a meeting of people for the purpose of selling and buying goods, including animals". A temporary facility does not provide a suitable place to sell animals. The Pet Industry and general public are demanding transparency and traceability for cats and dogs sold and a temporary facility does not have the transparency required to deny "puppy farms" and illegal breeders a physical outlet to sell their animals. A market has no obligation to check the correct details of every seller, supplier and animal sold at their market and so will enable markets to be a supply of unchecked and potentially illegally, sub standard bred animals with no dependable recourse for the purchaser and no compulsion to have ethically bred, healthy animals.

3.2.9 Pet Shop - Again remove the term markets for the above reasons.

10.2.3 Information given about new owners obligation to commit to ongoing training including obedience and the statistics should be given to a new owner about animals requiring rehoming or being euthanized due to lack of formal and effective training and subsequent behaviour issues. Discounted formal training with a registered, recognised obedience trainer could be organised at the time of purchasing their new family member. Puppy school is not to be a substitute for this requirement, even though it is an introduction to owning a puppy. This point is to highlight the importance of the requirement of the new owner to a commitment to years of obedience training.

The Animal Welfare Code of Practice Animals in Pet Shops is lacking in addressing rehoming instore by Pet Stores of Older animals. There is no direction as to how a Shop can operate and its obligations to the animal or the consumer under the Code of Practice to how it can rehome animals. The term broker is used in 10.2.2 but I presume that there is the expectation that the store only advertises these animals and invites shelters in for visits. It does not address older animals being kept instore or owned by the Store. There is a big movement in Victoria to legislate that Pet Stores only rehome animals. This is problematic as it is not legislated in any state and Pet Stores may be inadvertently operating outside the code depending on how they structure rehoming instore. Issues that would need to be addressed in legislation would be proof of ownership (especially as microchips can be removed), proof of surrender, required level of health of rescue animals and who is responsible for health and for how long, responsibility for behaviour testing prior to being rehomed and after rehoming. It also needs a full review on the size of pens, socialisation, exercise and handling. The NSW Animal Welfare Code of Practice Animals in Pet Shops addresses the issue of rehoming rescue animals in 10.2.2 where it has the desire for a close working relationship between pounds and shelters and pet stores. This is a workable solution to address the sale of animals in Pet Stores and suitably promoting rehoming animals & is desirable rather than just having only rescue pets in a pet store. I am concerned that the term rescue will be misused to actually facilitate the

sale of “puppy farm” pets and it just hides the issue behind the term “rescue” and not addresses the illegal, substandard breeding that exists. Who determines genuine rescue cases and not just hiding puppy farm pups as rescue?

The Pet Industry promotes responsible pet ownership and I would like to see implemented a Breeders Licensing System. I would like to see Pet Stores being able to sell fully traceable, ethically bred healthy pets where Stores and Breeders are registered, monitored and approved. The Pet Industry Association of Australia (PIAA), Pets Australia and the Australian Association of Pet Dog Breeders (AAPDB) can monitor Pet Stores who are members of their organisations and educate and demand that their member Pet Stores only purchase ethically bred animals that are fully traceable to registered, approved, vet audited Breeders. This can be self funded by the industry and monitored by the RSPCA. It needs to be a credible, transparent process that is supported and acknowledged by the RSPCA and government to protect firstly the animals and subsequently the new owners. A graded system of standards such as 1star, 2 star etc that is based on achieving certain levels of compliance above/below the basic code of practice can give the public indication of a Pet Store and Breeder. If they operate below the code there are penalties such as fines and/or loss of licence to be a store or breeder. They should also be acknowledged by Government & the RSPCA for how far above the basic code they operate, say a 5 star rating – 1 being below standard, 2 being minimum, 3 being slightly above standard, 4 significantly above standard and 5 being the highest standard. To be a 5 they must commit to continuous improvement of standards and welfare, be actively participating in training and raising the standard of the industry.

The number of animals kept by breeders needs to be regulated to take into account the number of people who are caring for these animals such as is addressed in The Victorian Code of Practice for the Operation of Breeding and Rearing Establishments. It is more desirable to have a number of staff daily to deal with a larger number of dogs than to limit the number of dogs a person can have but not stipulate that they are adequately supervised because they are not large in number. Each dog regardless of how many are owned needs to be adequately supervised. I would rather see many people required to look after a number of dogs with 24/7 supervision, rather than 1 person responsible for say up to 10 dogs with no regulated obligation to spend any dedicated time with any of them. The quality of the breeder and the standards they uphold with adequate staff to animal ratios are more desirable than unregulated, unlicensed breeders on a smaller scale than cannot be monitored adequately. Protection for all animals and consumers will come from Licensing and effective monitoring of every breeder whether they have one fertile dog or 200 dog, which is better than unlicensed breeders of any quantity of animals.

New proposals to address the sale of animals on the internet need to be implemented. The internet is an unregulated area of animal sales and is extremely difficult to regulate and monitor across various platforms and jurisdictions. I propose that all advertisements on the internet require the owner to be registered as a Breeder or Approved Registered Pet Store, registered with an applicable organisation, with a number that is traceable by the local council and the Breeder & Store submit themselves to inspection at the will of the regulatory body ie local council, RSPCA regardless of number of animals or number of litters they intend to have. Every non desexed animal has the potential to breed and so should be treated in legislation as a Breeding animal.

Confiscation of assets from non registered breeders for substandard treatment and sub standard breeding of animals should be legislated. Penalties must be harsh and enforceable in court to eliminate the disturbing situations some animals are being held in. The general public and also members of the Pet Industry demand transparency of where an animal comes from. There is an expectation that the environment when an animal is bred and that socialisation and enrichment is appropriate for every animal.

Thank you for the opportunity to make a submission.