

**Submission  
No 297**

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

**Name:** Dr Robert Zammit

**Date Received:** 15/06/2015

# PUPPY FACTORY INQUIRY

Dr Robert Zammit & Peter Hunt

## BACKGROUND

1. RSPCA Australia defines a puppy farm as *“an intensive dog breeding facility that is operated under inadequate conditions that fail to meet the dogs’ behavioural, social and/or physiological needs”*.
2. We have read documents published by the RSPCA, Dogs NSW, the Animal Welfare League and other interested parties. Doubtless, each of these organisations – and many others with a genuine love for dogs – will make formal submissions to this Inquiry.
3. We support any measures which will assist identifying puppies produced by puppy farms, including registration of all breeders. Whilst a cost is involved, the majority of breeders have a genuine love for dogs and we would hope that they would be prepared to meet any additional cost if it means that puppy farms will be driven out of business.
4. Given, however, that other organisations have devoted many hours to these issues, we do not propose covering old ground. Rather, we propose offering a different perspective.

## IDENTIFYING PUPPY FARMS

5. The difficulty we see with any form of registration (either of breeder or of puppies) is that puppy farm operators are unlikely to comply if they can get away with it. If neither breeder nor puppy is registered, how will a puppy be traced back to the unethical puppy farm?
6. We understand that the common practice is for puppy farm operators to supply their ‘product’ to pet shops before the ‘product’ is micro-chipped. Whilst the pet shop owner proceeds to micro-chip the puppies, prior to sale, there is nothing to trace the puppy to the puppy farm.
7. We further understand that the operators of these insidious businesses – run purely for profit and without regard for animal welfare – deliberately set up their breeding facilities in remote locations, away from the public glare.

8. The key issue, as we see it, is how to identify the operators of puppy farms and their location.
9. Thinking logically, puppy farms cannot operate without contact with the outside world, including:
  - a. Pet shops – There must be contact between the puppy farm and the pet shop in order for the puppies to be sold through the pet shop.
  - b. The internet – Prospective purchasers are able to make direct contact with puppy farm operators through internet sites (either sites run by the puppy farm operators or third party sites like ████████).
  - c. Purchasers – Whether over the internet, from pet stores or direct from the puppy farm operators, purchasers ultimately receive the dog produced by the puppy farm.
  - d. Pet food suppliers – Whilst food may be inadequate, the adult dogs used to breed puppies must be fed through some means in order to keep producing puppies.
  - e. Local communities – Even in remote locations, the existence of puppy farms cannot (surely) be kept a complete secret.
  - f. Local Councils – The local planning Authority has, at least, the opportunity to have input into the local land use of a property.
  - g. Vets – Even if puppy farm operators may not take either adult breeding dogs or their puppies to a Vet, the purchaser of a puppy from a puppy farm will ordinarily seek treatment from a Vet during the early life of the dog.
10. Each of these contact points represents an opportunity to expose the existence of a puppy farm and to identify the operator.

## PROPOSED REGULATION

11. With the above in mind, we suggest the following measures to stamp out puppy farms:
  - a. Pet shops – It should be illegal for a pet shop to sell dogs. Many pet shops now follow this ethos and make a good living in the business. Pet shops should become 'brokers' with registered breeders. Registration should not be required just of Dogs NSW members, but rather all breeds of dogs should require registration with a body that oversees breeders and their activities.
  - b. The Internet – It should be illegal to offer a puppy for sale on any internet site unless the vendor is a registered breeder and the puppy has been micro-chipped.
  - c. Purchasers – An education campaign should be established – eg: based upon the heartbreak an owner may experience when their beloved pet develops health or behavioural problems – discouraging people from purchasing dogs which have not been micro-chipped and their source properly identified.
  - d. Pet food suppliers – Suppliers of bulk pet food should be subject to a compulsory reporting obligation when there are reasonable grounds to suspect that the purchaser is operating a puppy farm.
  - e. Local communities – A system similar to Neighbourhood Watch should be established to encourage people to 'dob in' puppy farm operators.
  - f. Local Councils – An intensive breeding facility – properly defined by reference, perhaps, to a threshold number of breeding mothers or a threshold number of puppies per year – should require development consent from the local planning authority and the authority should be required to carry out inspections (similar to swimming pool regulation) to ensure that the dogs have adequate space, food, breeding cycles, general care etc.
  - g. Vets – When a vet treats a puppy which is not micro-chipped, the vet should be encouraged to obtain as much information as reasonable in the circumstances to identify the source of the dog and provide that information to the relevant authority.

## MODERN TECHNOLOGY

12. In our reading on this subject we have also read much about the cost of inspections.
13. We have no doubt that physical inspections are required and these will cost money.
14. We believe, however, that modern technology should also be used to supplement inspections and render investigations into puppy farm operations more targeted.
15. For example:
  - a. Use of drones – Local Councils, RSPCA Australia, AWL, Dogs NSW etc should investigate the cost of using drones to inspect properties suspected of being used to operate puppy farms and any regulatory impediments to using drones for this purpose should be removed.
  - b. Social media – Websites like Facebook may be used to supplement the neighbourhood watch scheme mentioned above.
  - c. Smartphone Apps – An App can be developed to provide information to assist purchasers separate ethical breeders from unethical breeders (even if compulsory breeder registration does not become law).
16. Good luck with your Inquiry. We look forward to some positive outcomes.

DATED: 15 June 2015

**Dr Robert Zammit**

Veterinarian / Animal Lover  
[REDACTED]  
[REDACTED]

**Peter Hunt**

Director / Dog Lover  
[REDACTED]  
[REDACTED]