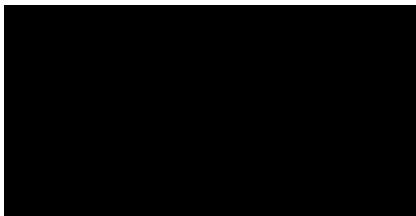


**Submission  
No 238**

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

Name: Name Suppressed  
Date Received: 14/06/2015

*Partially Confidential*



15th 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,

We are one of Australia's largest independent pet stores that also specialize in companion animals. We have been a family owned business for over 31 years in our [REDACTED] Location and have seen significant change within the Pet Industry. We employ around 50 staff that love working with companion animals and their priority is to ensure their welfare.

We specialise in assisting first time pet owners in making the right choice and ensuring new pet owners make an informed decision to suit their lifestyle. This is supported by many courses we provide to ensure the long term wellbeing of our pets after they leave our care. We specialise in puppies, kittens, small animals, birds, reptiles and aquarium fish. [REDACTED] provides an important service by sourcing companion animals from ethical breeders and allowing a new pet owner to make an informed decision when looking for a new pet. We also offer extensive guarantees and follow up services for customers.

We have successfully rehomed 201 adult AWL cats to date, some of which were long term occupants at AWL. We have also started working with GAP to help rehome greyhounds. A few weeks ago we had an open day where 13 greyhounds found their forever homes.

We have been a PIAA member for over 25 years [REDACTED] to help resolve many of the issues with companion pets around compliance of retailers and breeders. I have been active in contributing to the national PIAA Code of Practice, input into the designing the recent reptile license system [REDACTED]

We welcome this enquiry so that the facts about our industry can be reviewed to ensure the best animal welfare outcomes. We want to see an end to the un-ethical breeding practices and shut down any establishment who ignores animal welfare.

We support the RSPCA definitions that a puppy farm/ Mill/ Factory is "an intensive dog breeding facility that is operated under inadequate conditions that fail to meet the dogs' behavioural, social and/or physiological needs".

We do not support the total ban of the sale of puppies and kittens in pet stores as I strongly believe this would have a negative effect on animal welfare and would mean the end of the most transparent part of the industry. I also support a self-funded license system to provide a regulator (such as the RSPCA) the funds it needs to carry out mandatory audits of breeders and pet stores.

Following is my submission along with our solution to the issues. [REDACTED]

Regards





## Our solution to the puppy farm issue

If every pet was acquired from a facility like ours, there would be almost no animals in shelters and there would be no puppy farms

### **Every puppy we find a home for is one less puppy a puppy farm sells**

We know this as we have a close relationship with our breeders and have developed a system that works for animal welfare and provides commercial viability to ensure we can continue to do so many years to come. We provide confidence to our customers that we do not deal with un-ethical breeding practices and we do this by;

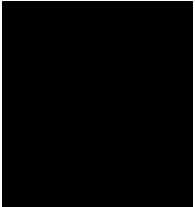

1. Visiting our main breeders annually
2. Having our breeders audited by a veterinarian annually
3. Ensuring breeders microchip their puppies meaning tractability to their premises
4. Volunteering our breeder information to RSPCA and AWL for random inspections
5. Offering a health guarantee
6. Providing a 7 day cooling off period
7. Free vet checks before and after customers take their puppy home.
8. Offer training services such as puppy preschool, junior school, scent classes and soon trick training
9. Introducing customers to a local veterinarian for future service
10. Providing 4 weeks free pet insurance
11. Recommending and encouraging de-sexing with an incentive.
12. Offering lifetime rehoming for dogs via PIAA Rehoming and Tractability policy
13. Ensuring enclosures are roomy and climate controlled and aesthetically pleasing
14. Providing puppies with environmental enrichment
15. Only allowing trained staff to deal with pet new owners so that they are welfare orientated and will refuse a sale of a puppy should it not be suitable.

The secret is that we truly self-regulate by allowing RSPCA/AWL to do voluntary audits of our breeders and of our retail establishment.

The only solution is that a self-funded licensing system is formulated to ensure:

- all breeders are located and guarantee transparency
- all breeders are audited and held accountable to the current regulations
- A breeder must quote their license when finding homes for their puppies
- A strict policy around number of litters per breeding dog
- A rehoming policy around re homing breeding animals.
- Mandatory training for Pet Stores and breeders via a recognized course through TAFE

Should the above be implemented the issues around puppy farming would be resolved easily and relatively quickly.





Petopia Pty Ltd T/As Kellyville Pets  
Submission  
Companion Animals Breeding Practices in NSW

#### **A. The current situation in NSW in comparison with other jurisdictions**

We are governed by the following legislation:

- Prevention of Cruelty to Animals Act 1979 and regulations 2012
- Prevention of cruelty to animals (Animal Traders) 1996
- Companion Animals Act 1998 and regulations 1999
- Codes of Practice
  - Animals in Pet Shops 2008
- PIAA National Code of Practice
- PIAA standards and Guidelines for best Practice in Retail Stores 2015
- PIAA Dogs Lifetime Guarantee Policy on Rehoming & Tractability Program 2013

The above legislation and Codes of Practice requires that we operate in an ethical and animal welfare orientated manner. In summary the legislation and COP requires me to:



1. To provide minimum enclosure sizes for our pets in our temporary care
2. Practices to ensure good animal husbandry and welfare outcomes
3. Conditions as to how we acquire animals
4. Complete record trail of where our all of our companion animals come from and where they go and making this available for inspection by authorities at any time.
5. Cooling off periods allowing animals to be returned in the unlikely event that the new pet / owner relationship cannot continue
6. Lifetime guarantee on all puppies that will ensure that re-homeable dogs will never be euthanized in the very unlikely event that they end up at a shelter.
7. Audit process for our dog breeders
8. Micro chipping for kittens and puppies at the breeder level so lifetime traceability is achieved to the breeder and the premises from which they are bred.


#### **B. Proposals to limit the number of animals allowed to be kept by breeders**

In my 31 years of experience dealing and visiting many breeding establishments, I can say for certain that poor animal practices are not limited to large volume dog breeders. I have seen more poor practices with 5 to 10 breeding dogs and to a lesser extent large breeding facilities. It comes down to the knowledge and skills of the breeder, their attitude to animals welfare and the love for animals and the level of exposure they have to the general public. ie the ability to see facilities as opposed to shipping puppies or meeting in a car park.

I have seen large scale breeding and housing facilities in Australia and around the world. Good breeding establishments are transparent and have strict procedure to manage the health and wellbeing of all the dogs. I have also seen large scale establishments in the US that are operated by well-known brands of dog and cat food where dogs are better looked after and socialised than a dog sitting at home alone for 10 hours a day.

The most important considerations are as follows:

- Transparency to authorities
  - Enforcement of COP and legislation
  - Number of animal attendants per dog rather than capping the quantity.
  - Policy around rehoming of breeding dogs ie allowing breeders to only breed 5 litters or less from a breeding female. Training the dog throughout its life for the rehoming
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process to ensure a good transition. De-sexed and re home the dog into a suitable home. The facilities in the states do exactly this and some of those facilities house 300 dogs with a ratio of 1 animal attendant to 25 dogs.

- Good policy around enclosure sizes and provision of practices to provide the social, physical and physiological needs of every dog

### **C. Calls to implement a breeders licensing system**

A breeder in my opinion is anyone with an entire dog that has the ability to breed irrespective of quantity or whether it is a pure or cross breed. A licensing system is the most logical solution as the issue isn't regarding legislation, it's about compliance and transparency. Licensing is relatively easy to implement and be made self-funding via license fees. The current system allows for rogue operators to trade unnoticed and ignore legislation. They are financially rewarded by trading online to ensure they get the maximum return and without any form of compliance. A licensing system will force breeders to understand their obligations and commitment to animal welfare and make it too difficult to trade should they be in it for the wrong reasons. The exposure of breeders will bring them into more public scrutiny as this is the best and cheapest form of compliance, much like the public compliance of pet stores.


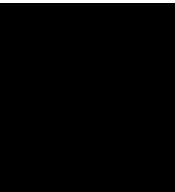
### **D. The implications of banning the sale of dogs and cats in pet stores.**

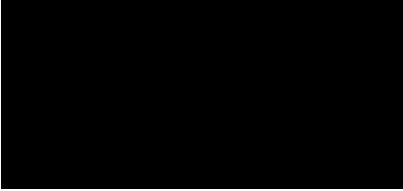
#### **Commercial sustainability**

There are many good retailers currently operating that will simply close down as they rely on the sale of puppies and kittens to operate a viable business. There is often a debate around commercial establishments and animal welfare, the fact is whether or not you are a retailer, breeder (pure or cross), animal shelter or rescue organization, excellent animal welfare is paramount for long term commercial viability. A retail establishment must pay staff, rent and manage other costs within the business and provide follow up service for the life of the animal. Good animal welfare practices make for an even more viable business as a pet store simply won't survive in the current climate unless they provide a sound level of animal welfare as their reputation is at stake. Our customers are the best inspectorate.

#### **Animal welfare**

Banning of the only transparent part of the equation doesn't make sense from an animal welfare point of view. Even with the lack of compliance, the majority of pet stores operate in a professional manner. Of course there is always the exception, but the system allows for this to happen and can very easily be fixed. Should pet stores be banned, it would have significant implications on Animal welfare:

1. There will always be a market for puppies and people who want to own a puppy will be forced to locate someone online from a system we all know is impossible to manage and regulate. This is especially dangerous for first time pet owners who don't have the skills to understand temperament, health and general traits of certain breeds.
  2. Most breeders live in regional areas many hours drive out of Sydney making it difficult for the new pet owner to review and compare breeders and breeds and make an informed decision.
  3. Breeders will have a bias towards their own breed which could lead to a mismatch of pet and owner.
  4. A pet store can have a wide variety of pets and dogs to ensure the new pet owner has many options to suit their lifestyle
  5. Pet stores can offer products and services such as puppy pre school
  6. Pet Stores have the knowledge on the best items to keep the pet happy and healthy for the life of the pet
  7. Pet Stores can offer after sales service should there be further requirement for education or should an issue arise.
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8. Pet stores in the majority of cases get into the business because they love animals. Coupled with this they have a vested interest to ensure they are compliant and have animal welfare as their top priority.

**E. Any legislation changes that may be required**

I believe that current legislation is sufficient for pet stores. An overall review for breeders would be recommended in particular around enclosure/pen sizes. I would support a compulsory de-sexing of all kittens in pet shops and online unless to a license holder. This could be done at time of sale or via a pre-paid de-sexing voucher. Re puppy de-sexing, I don't believe there is an issue as the majority do de-sex within 6 months. Should it be proven that de-sexing puppies prior to sale or via a de-sexing voucher is of benefit due to unwanted litters being produced I would also support mandatory de-sexing of puppies, however I would be surprised if this is the case.

I would also make fines for serious infringement large enough that a rouge operator be financially unable to start again. Even jail time for very serious offenses.

**F. Any other related matter**

- There seems to be lack of accurate consistent data regarding where animals are traded and how many end up in shelters and reasons why
  - The lack of data is leading to decisions being made based on emotional opinion not based on fact.
  - Useful data would be the types of breeds that end up in shelters and where they come from ie most dogs I see at shelters are large cross breeds. These are not current breeds you see in pet stores.
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