

**Submission
No 264**

COMPANION ANIMAL BREEDING PRACTICES IN NEW SOUTH WALES

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Position: Group Manager
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just for pets
your local independent pet store

15 June 2015

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

Via email; CABPinquiry@parliament.nsw.gov.au

Dear Mr Marshall,

Re: Just For Pets response to Companion Animal Breeding Practices in NSW

Just For Pets is Australia's largest group of independent pet retailers. We proudly represent over 20% of pet stores in Australia, who maintain their own independence within their businesses whilst being a part of the bigger picture. Many of our member businesses have been in operation in excess of 20 years and hold a wealth of animal health and welfare knowledge.

In 2014 the Just For Pets Group announced a world first within the Pet Industry with the introduction of our Just For Pets Pet Health Centre, offering a FREE SIX point pet health check in our participating stores Australia wide.

Along with the launch of the Pet Health Centre Just For Pets is now collecting statistical information that has never before been collected about the pets health and welfare, which includes where the pet was purchased/acquired, information about desexing, vaccinations plus general health information including parasite prevention, dietary and much more.

Just For Pets applauds the NSW Government initiative for a Parliamentary inquiry into Companion Animal Breeding Practices in NSW and are pleased to provide a solution towards the welfare of companion animals.

On behalf of Just For Pets stores I welcome the opportunity to discuss with you further the ideas put forward to you on the following pages.

Kind regards,

Karen Justice
Group Manager/Founder
Just For Pets

Just For Pets Stores

Just For Pets believes that pet shops play an important role in the Australian community as a source of companion animals, of companion animal care products and of advice.

The responsibilities associated with selling animals, products and providing advice about their care requires an ethical approach, a knowledge of and concern for the welfare of animals, and an appreciation for the role of companion animals in the community.

Earlier this year Just For Pets developed the Animal Welfare Guidelines for Just For Pets Stores who sell or house livestock in their business. All Just For Pets stores must adhere to these guidelines along with compliance to all relevant Federal, State and Territory Legislation and/or Codes of Practice in relation to their business operations.

Where are pets acquired?

There is limited data available on the sources of acquisition of pets in the community. In 2005 a Victorian study found that 8% of cats and 11% of dogs were obtained from pet shops. A similar study that pet shops supplied 9% of cats and 14% of dogs.

However in 2014 the University of Adelaide conducted research and 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.

Just For Pets stores have a strict record keeping process to ensure that the breeders are known to the store or person in charge and stores must source puppies and kittens from breeders who maintain high welfare, health and genetics standards of their breeding stock and offspring.

Just For Pets stores have formed relationships with rescues and shelters, particularly with assisting in the rehoming of cats and kittens and have been very successful. In a recent animal adoption and fundraising day held at over 50 Just For Pets stores, 80 animals (including dogs, cats & rabbits) were rehomed.

Puppies and kittens in Just For Pets stores are sold microchipped, vaccinated and have been health checked by a Veterinarian, they leave the store with "care packs" which include parasite treatment and quality information about care and nutrition and details on what to do should an emergency arise.

Ban of online pet sales

The current legislation allows for the sale of animals online without any documentation or audit trail back to the seller and does not include a return or health guarantee. Banning the sale of dogs and cats in pet stores will only increase and drive online sales.

Just For Pets would support a ban of online pet sales through such sources as [REDACTED]. Just For Pets believes that these sources cannot provide prospective purchasers with the correct information to make an informed decision about the chosen pet, they do not provide any assistance on nutrition and welfare or provide guarantees of health, there is little traceability if the animal was to fall ill. In most cases the animals are not microchipped nor have they had a health check at a Veterinarian.

Recently [REDACTED] changed their requirements for sellers of Pets to include; *"A pricing limit of \$500 per pet advertised for adoption/sale applies to any unregistered breeder or private advertiser. The price must be stated in the ad. Unregistered breeders/owners are NOT permitted to use the 'Please Contact' price option in their pets ads"*. This process has seen the falsely advertised use of registered Breeder License numbers being used in advertisements and does not prove to be an effective way towards regulation of online animal sales.

Breeder Licensing System

Just For Pets strongly believes that a Breeder Licensing and Inspection program is the way forward for anyone breeding dogs and cats, similar to that recently passed in the ACT. Whereby a Breeder must have their premises inspected yearly, and be compliant with the NSW Code of Practice for Breeding and Rearing Establishments, the breeder would then be issued with a compliance certificate along with a breeder licence number; pet stores would be unable to purchase stock from breeders who do not hold a current compliance certificate.

Pet Shop Licensing

Just For Pets believes that the introduction of a yearly Licensing and Inspection program should be adopted, similar to that in Victoria. The licensing and inspection program would not only be for stores selling puppies and kittens but to those who sell fish, small animals and birds. The store would be audited yearly against the Animal Welfare Code of Practice 'Animals in Pet Shops' by enforcement officers. Stores would pay a yearly fee of not more than \$200 and be issued with a certificate of compliance which must be displayed in store.

Desexing of dogs and cats

Just For Pets believes desexing is important in the control of animal populations and has other behavioural and health benefits. It is currently the only widely available, effective and permanent method of preventing unwanted breeding and pet overpopulation.

Although pets benefit from being desexed, Just For Pets adopts the statement from the Australian Veterinary Association *"that there are inherent deficiencies in the concept of compulsory desexing"*.

When a puppy or kitten is purchased from a Just For Pets store the purchaser is provided with a recommendation to have the animal desexed, a number of Just For Pets stores not only offer a discount desexing voucher at the time of purchase, others include the price of desexing into the sale price and provide a fully paid desexing voucher to the new owner, meaning there is no additional cost to the purchaser to have the animal desexed when it reaches the desired age for desexing and registration.

Ends.



just for pets
your local independent pet store

ANIMAL WELFARE GUIDELINES FOR ANIMALS IN

JUST FOR PETS MEMBER STORES

Just For Pets Position Statement – The Sale and Breeding of Puppies and Kittens

To be clear, Just for Pets does not condone puppy farming and has actively discouraged the practice by reporting the two organisations it has become aware of to the authorities. Just for Pets founder Karen Justice is an animal activist and industry figure who is well-known for her stand against unethical practices in the pet industry.

At Just For Pets, we believe everyone has the right to own a pet, but more importantly, every pet has the right to be part of a loving, caring forever home. At present, when animal lovers in this country decide to find a new pet to suit their family, they have several options, and we are aware that for some, finding a puppy or kitten is their first choice.

On every level, Just For Pets acknowledges that adoption should be provided as an excellent option to pet owners when choosing a pet. We actively encourage pet adoption and awareness of this option in our stores through ongoing partner relationships between many of our stores and their local adoption centres. Plus we host a national group initiative, 'Save A Life Saturday', which is a fundraising and adoption day designed to support animal shelters and educate pet owners in the ways to reduce animal abandonment.

However, we also acknowledge that animal lovers in this country have the right to buy a puppy or kitten from another source such as a pet store or breeder, as adoption is not the preference of some people.

A small number of our member stores sell puppies and kittens within a strict group policy that ensures the wellbeing of all animals housed in store at all times. Stores carefully screen breeders to ensure they are reputable and responsible breeders who operate ethically. They also record all details of the litter and the animal's parents.

We give our assurance that as true animal lovers, Just For Pets member stores unequivocally do not support puppy farms. In fact, Just For Pets has actively campaigned against irresponsible breeders and puppy farms. For instance, Just For Pets has twice become aware of puppy farms in operation and reported them both to the authorities. On one occasion when action was not taken by the authorities, Just For Pets engaged its own legal team to take action. Both puppy farms have since ceased trading.

At this time in Australia, no enforceable governmental policy or law exists to regulate the sale of animals. At Just For Pets, we believe if someone chooses to purchase a puppy or kitten, purchasing from a responsible pet shop is the best option to know that the pet was not sourced from a puppy farm, and the owner can be guaranteed that the animal has been vet checked, vaccinated and micro-chipped. We also promote de-sexing of animals, but understand that there is debate as to at what age this should be performed.

Purchasing via classified advertisements and online stores is high risk and until legislation exists to govern all breeding and animal sales, Just For Pets discourages it expressly.

We hope that this statement helps to clarify in good faith the way that Just For Pets seeks to help lead and support responsible pet breeding and pet ownership for Australian pet lovers.

Who is Just For Pets?

Just For Pets (JFP) is Australia's largest group of independent pet retailers. We proudly represent over 70 stores around the country who trade under their original shop names and actively support their local communities.

We love pets and it is our passion and purpose to help Australian pet owners have the best relationship with happy and healthy pets all their lives long. So we believe in empowering pet owners with the knowledge, services and quality brands they need to take great care of their pets.

Many of our stores have been owned and run by the same Aussie families for generations. Our experienced and highly trained staff are pet experts and can also refer pet owners to local independent vets. So for good old-fashioned friendly service and quality advice, come in and see one of our friendly pet experts.

When humans manipulate or limit an animal's choices in relation to its physical or social environment, the welfare of that animal must be considered and a duty of care is involved. The greater the level of control of an animal or intervention with its environment, the greater the responsibilities to consider animal welfare become.

Compliance with this Policy does not remove the need to abide by the requirements of any other laws applicable within the state or territory, including Local Government Acts, National Parks and Wildlife Acts and Prevention of Cruelty to Animals Acts (or similar).

JFP Member Stores who sell animals are expected to conduct themselves in accordance with demonstrating their commitment and concern for the welfare of animals in their care. The owner/proprietor, person in charge is responsible for the humane keeping and selling of animals in the Member Store and the humane management of the sale of animals in general taking into account community attitudes and expectations about the humane treatment of animals at all times.

This Policy will be revised from time to time to take into account new knowledge of animal physiology and behaviour, technological advances, developments in standards of animal welfare and changing community attitudes and expectations.

1. PURPOSE

It is a requirement of Just For Pets (JFP) that all Member Stores undertake best practice when sourcing, housing, and caring for the livestock in their care prior to sale.

All livestock held by JFP Member Stores comply with all State and Territory Legislation, Regulations and Codes of Practices (COP) in the Member Stores State or Territory to ensure the best possible animal welfare standards are maintained.

2. LIVESTOCK

Livestock may include:

- Puppies and Dogs
- Kittens and Cats
- Birds
- Fish
- Guinea Pigs
- Rabbits
- Rats and Mice
- Reptiles
- Insects
- Hermit Crabs
- Poultry
- Production animals as pets
- Other animal held by the Member Store for sale

3. STAFF

a. The Owner/Proprietor

The owner/proprietor is the person who has legal ownership of the store and has responsibility for the overall operations of the business. This may be the person in charge.

b. Person in Charge

Each JFP Member Store must have a person in charge for the duration of the opening hours of the store. This may be the owner, manager or appointed person in charge.

c. Employees

The Person in Charge should have sufficient staff available to assist in the care and management of the livestock in their care.

d. Staff Training

The Person in Charge is responsible for ensuring each employee is trained in caring for the individual needs of all species in their care.

e. Health and Safety

All staff must be given appropriate site specific Health and Safety training.

f. **Zoonotic Diseases**

All staff should be trained in Zoonotic Disease management and control for each of the species in the JFP Member Stores care. This must include handling, isolation and vet care and medication where necessary. A list of symptoms of common zoonotic diseases and treatments must be displayed in a prominent position for the use of all staff. A protocol must be documented to ensure the correct handling of these animals to prevent the cross-contamination of disease between animal and human. This must include personal protective clothing, handling and veterinary consultation.

4. SOURCING ANIMALS

- a. Puppies and kittens must not be sold under 8 weeks of age
- b. The person in charge of the JFP Member Store or the person responsible for ordering the stock must ensure that the livestock purchased for sale in the store is sourced from reliable, responsible breeders/owners. The owner/proprietor/person in charge of the JFP Member Store or the person responsible for ordering the stock must ensure that the livestock purchased for sale in the store is sourced from reliable, responsible breeders/owners. They must be sourced from breeders known to the owner/proprietor/person in charge who maintain high standards in the welfare, health and genetics of their breeding stock and offspring. All breeders should be registered with government (where required).
- c. **Puppy/kitten farms** – The RSPCA define a puppy farm as “an intensive dog breeding facility that is operated under inadequate conditions that fail to meet the dog’s behavioural, social and/or physiological needs”. Kitten farms are defined under the same conditions as Puppy farms and are usually large-scale commercial operations but inadequate conditions may also exist in small volume breeding establishments which may or may not run for profit. Puppy/kitten farming is a major animal welfare issued in Australia and puppies/kittens coming from these farms may be sold via any avenue of sale including internet, newspaper ads, markets, car boot sales, pet shops or sometimes at the puppy/kitten farm itself.
- d. The name address and a contact number of the breeder/owner must be recorded in the Member Store records together with details of the animals purchased (date of birth, sex, dam, sire, microchip number if applicable).
- e. Puppies, dogs, kittens and cats are required to be microchipped in most Australian States at point of sale. It is the responsibility of the JFP Member store to ensure the microchip details are transferred into the new owners name and that registration of the animal is undertaken.
- f. In States where no microchip or registration legislation and regulations exists, the JFP Member Store should strongly advise the new owner to have their animal microchipped and recorded on a recognised microchip registry to ensure traceability should the animal become lost, stolen or abandoned.

5. TRANSPORTATION

- a. Legislation and Codes of Practice for the Transportation of animals are applicable in some States in Australia and must be complied with when transporting animals.

- b. When transporting animals to and from the JFP Member Store, staff must ensure that the animals are contained safely within appropriate enclosures so as to reduce any injury to the animal.
- c. Like species may be carried together (e.g. litters of puppies or kittens)
- d. Different species must be housed separately and out of eyesight of other species.

6. HUSBANDRY

- a. **Housing** – enclosures for each specie should comply with State COP’s where applicable or in the absence of a State Code the Victorian Code of Practice for the Operation of Pets Shops should be used as a guide for size and number of animals per enclosure.
- b. **Stock Levels** – stock levels should not cause overcrowding of species so as to allow space for each animal to move freely around the enclosure with access to food and water. The Person in Charge should be guided by their State COP or in the absence of a COP the Victorian Code of Practice for the Operation of Pets Shops should be used as a guide.
- c. **Feeding/Watering:**
 - i. Puppies from 6 weeks to 6 months of age must be fed a minimum of 2 meals per day
 - ii. Dogs must be fed a diet that provides proper and sufficient food to maintain good health and meet their physiological requirements
 - iii. All dogs, but especially any that may receive offal as part of their diet must be given regular treatment to control intestinal parasites
 - iv. Kittens from 6 weeks to 6 months of age must be fed a minimum of 2 meals per day
 - v. Cats must be fed at least once a day
 - vi. Cats must be fed a diet that provides proper and sufficient food to maintain good health and meet their physiological needs
 - vii. Cats must not be fed a purely vegetarian diet
 - viii. Cats must not be fed a diet consisting purely of fresh meat (including fish)
 - ix. Cats must not be fed dog food as it lacks nutrients that cats require
 - x. All other animals must be fed with the appropriate food specific to their individual needs
- d. **Cleaning**
 - i. All animal enclosures must be checked daily and cleaned as required. This may mean more than once per day depending on the species.
 - ii. Enclosures for puppies, dogs, kittens, cats, rabbits, guinea pigs, rats & mice and birds must be cleaned daily
 - iii. Litter trays must be replaced daily and faeces removed as soon as possible to prevent the animals becoming soiled and to prevent excessive odours.
 - iv. Water and food containers must be checked regularly to ensure they are not contaminated. Clean fresh water should be available at all times.
 - v. Fish enclosures must be kept clean and water tested regularly to ensure the health and wellbeing of the fish. Tanks are to be kept clear of growth on the glass and enclosure ornaments. This is particularly important to ensure those customers visiting

the store do not have the perception that the care and welfare of the fish is compromised

- vi. Care should be taken when staff use cleaning chemicals which may be detrimental to their own and the animal's health. MSDS sheets for all cleaning products should be prominently on display for staff

7. HEALTH AND WELFARE

- a. Health checks – Staff should ensure they check each animal in their care daily for signs of ill health.
- b. Records – records should be kept for animals recording eating and drinking habits, defaecation, unusual behaviour and signs of ill health. Any animal suspected of deteriorating health should be reported to the person in charge immediately and removed to a quiet back of house enclosure to be monitored and undergo a veterinary check if necessary
- c. In the event that an animal shows aggression to one or more of the other animals in an enclosure, the aggressor is to be removed and placed in a separate enclosure so as not to injure any other animals
- d. Agreement with Local Veterinarian – a written agreement should be undertaken with at least one local veterinarian who can attend to sick livestock as required
- e. Removal of sick animals – any animal suspected of ill health should be removed from their enclosure and isolated in a quiet back of house enclosure
- f. Zoonotic Diseases – must be treated in accordance with the instructions referred to under Staff Training
- g. Isolation – animals suspected of contagious diseases must be isolated in a separate back of house enclosure well away from other species likely to contract the disease
- h. Removal of dead animals – In the case of fish, sick and dead fish must be removed from their enclosure as soon as possible. Sick fish must be isolated in a separate back of house tank and allowed to die naturally before disposal. Dead fish should be disposed of as soon as removed from the tank
- i. Euthanasia – euthanasia of all species must be carried out by a Veterinarian or a person who is trained and qualified to undertake euthanasia
- j. Disposal of dead animals - must be disposed of in accordance with Local Government disposal laws

8. SALE OF ANIMALS

a. Pre-Sale

Many new owners are unaware of the commitment having a pet brings and JFP Member Stores should talk through the commitment with prospective owners prior to them purchasing the animal. Staff may get a better understanding of the new owner's lifestyle by discussing their family and work commitments, how they intend to contain and house the animal and the time they will have available for exercise and enrichment of the animal

b. Return Policy

JFP Member Stores must have a written return policy which sets out the process that applies should a new owner wish to return the animal they recently purchased. A copy of the policy should be given to the new owner at point of sale

- i. If the animal is not acceptable to the new owner because of health or other reasons that are supported by a statement from a veterinarian, excluding accidents within seven (7) days of purchase, the JFP Member Store must take the animal back and refund all monies or offer a replacement animal with the same guarantee
- ii. If the animal is returned within three (3) days for any other reason, the JFP Member Store must refund 75% of the purchase price or offer a replacement animal with the same guarantee
- iii. If the animal dies or is euthanased as a result of a disease that is traceable to the point of sale, the JFP Member Store must refund the purchase price or offer a replacement animal with the same guarantee

c. Sale

When purchasing an animal new owners must be given an information kit on the care and welfare of their new animal. This should include:

- i. Species specific information
- ii. Registration/microchipping (copies of documentation)
- iii. Vaccinations (copy of vaccination certificate)
- iv. Exercise
- v. Feeding
- vi. Grooming
- vii. Ticks and fleas
- viii. Ongoing veterinary care
- ix. Going on holidays
- x. De-sexing – dogs and cats. It is recommended that JFP Member Stores strongly advise all new owners to have their new puppy or kitten de-sexed as soon as possible after they purchase the animal unless they plan to breed from the animal. In some States in Australia a person is required to have a licence to breed animals and needs to be registered with the appropriate government department

d. After Sales Service

New owners should be encouraged to keep in contact with the JFP Member Store to ensure the animal is being cared for correctly or if the new owner has any questions to ask about the animal

9. SHELTER ANIMALS

Some JFP Member Stores do not sell livestock (in particular puppies, dogs, kittens and cats) but allow responsible rescue organisations and shelters to promote the sale of their animals through a Member Store.

A written agreement should be undertaken between the rescue organisation/shelter and the Member Store outlining the arrangement for these animals. This agreement should include the following:

- a. **Transportation To and From the Store**
 - i. Is the animal to be left with the Member Store for the duration of its stay?
 - ii. Is the animal to be taken back to the shelter at the end of each day?
 - iii. Is the Store owner or person in charge allowed to take the animal to their own home at the end of each day?
 - iv. How long the animal should stay in the JFP Member Store if it is not finding a home
 - v. Rotation of stock of other shelter animals

- b. **Special Needs for the Animal**
 - i. Feeding requirements
 - ii. Exercise and enrichment
 - iii. Grooming

- c. **Sale of the Animal**
 - i. Does the full amount from the sale go to the Shelter?
 - ii. Is a percentage given to the JFP Member Store and the balance given back to the shelter?

- d. **Housing of the Animal Whilst in the Store**

Keeping shelter animals in separate enclosures from other animals in the store

- e. **Signage**

Signage should be prominently displayed on shelter animal enclosures stating that the animals are shelter animals and naming the shelter/rescue organisation

- f. **Veterinary Treatment**

Determine who is responsible for payment of veterinary treatment for a shelter animal if it becomes ill?

- g. **Return of an Animal**

The agreement must also include the process for people who wish to return the animal for whatever reason