
Hi Emma,

Barry has asked that I also respond on his behalf as he is OS at present. We have no transcript corrections of note.

The question below was asked of us;

The Hon. MARK BANASIAK: Mr Parkinson and Mr Codling, in your submission you talk about the guidelines that you have developed for your members and a model breeder licensing system that would be self-funded. Have you presented that concept or those models to anyone from the Government?

We have attached our submission into the NSW parliamentary enquiry and licence template or model from June 2015. Our model raises \$565k pa which would run approx. 5 inspectors specifically for pet shops and dog breeders in NSW; however, these numbers are now 5 years old and would need to be updated. The basis of the model can still be followed with adjusted license fees to obtain enough funds to cover an authority such as RSPCA to audit breeders and pet shops

Also attached is the Government response to the Panel's recommendation for licensing of dog breeders (see page 4)

Further detail can be found in the link below:

<https://www.parliament.nsw.gov.au/committees/listofcommittees/Pages/committee-details.aspx?pk=161#tab-termsofreference>

If you have any further questions, please let us know.

Regards

John Parkinson

Membership Manager

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.



The Hon Niall Blair MLC

Minister for Primary Industries
Minister for Lands and Water

IM15/26450
Your ref: LAC15/046



Ms Ronda Miller
Clerk of the Legislative Assembly
Parliament House
Macquarie Street
SYDNEY NSW 2000

Dear ~~Ms Miller~~ *Ronda*

I refer to your letter to the Premier, the Hon Mike Baird MP, on 27 August 2015 which enclosed a copy of Report 1/56 of the Joint Select Committee on Companion Animal Breeding Practices in NSW. Your letter was referred to me as the matter primarily falls within my area of portfolio responsibility.

I am pleased to provide the NSW Government's response, enclosed, to Report 1/56 *'Inquiry into Companion Animal Breeding Practices in NSW'*.

Yours sincerely

25 FEB 2016

The Hon Niall Blair MLC
Minister for Primary Industries
Minister for Lands and Water

Encl.



NSW Government response to Report 1/56 of the Joint Select Committee on Companion Animals Breeding Practices in NSW

The NSW Government welcomes the final report of the Joint Select Committee on Companion Animals Breeding Practices in New South Wales. The Government is committed to ensuring the welfare of animals in NSW, and in particular, ensuring that companion animals breeding practices are safe, ethical and meet the expectations of the community. We do not tolerate those who mistreat animals and will continue to work with industry and enforcement agencies to stop these practices.

The Government supports the majority of the Committee's recommendations either fully or in part and recognises there is more work to do to ensure the welfare of animals across NSW. We are confident that there are projects currently underway that, once implemented, will give agencies more information about breeders across NSW and their activities. This will provide the information we need to ensure that standards are being met and enable us to identify those not meeting standards earlier.

The Government welcomes the Committee's recommendations about improving data collection and linkages and the completion of the Companion Animals register revision. The Government considers that the revision of the register and other improvements that will be made is the most important tool for authorities to use to identify and address unlawful companion animals breeding practices in NSW. The revision of the register is a major exercise which will digitise all of the records kept, provide a way for breeders and owners to ensure details are up to date, and enable tracking of puppies from breeder through to owners. It is important to ensure that it is appropriately authorised, operationally effective and provides adequate access to participants including breeders, pet owners, enforcement agencies and councils. For this reason, the Government will deliver the new register in stages from July 2016.

A number of the Committee's recommendations will be implemented as soon as possible following the new register's commencement, including:

- ensuring that an identifying number is displayed in paper or online advertisements or at points of sale
- digitising microchipping and combining them into a single step
- making parts of the register publicly accessible to enable the public to verify breeder details.

A full response to each of the Committee's recommendations is attached.

NSW GOVERNMENT RESPONSE TO REPORT 1/56 OF THE JOINT SELECT COMMITTEE ON COMPANION ANIMALS BREEDING PRACTICES IN NSW

Joint Select Committee on Companion Animals Breeding Practices – recommendations and responses		
REC	DESCRIPTION	RESPONSE
1	The Committee recommends that the NSW Government implements the recommendations of the NSW Companion Animal Taskforce Report, as a priority.	<p>Supported.</p> <p>The NSW Government remains committed to supporting a majority of the recommendations, either wholly or in principle.</p> <p>Those measures targeted at dangerous dogs have been prioritised given the need to secure community safety – 13 of these 15 recommendations have been completed or are currently being implemented.</p> <p>The Government has already:</p> <ul style="list-style-type: none"> • delivered Education Programs targeting safe interaction with pets for preschool and primary school aged children, and, expectant and new parents; • stopped breeders selling cats and dogs without microchips to pet shops; • provided a \$900,000 grant program for councils to target microchipping, registration and desexing; • introduced controls for menacing dogs; • increased penalties for dog attacks; • reduced by 50% registration fees for animals from pounds and shelters; and • established a new Pet Reference Group of industry experts to provide ongoing advice to Government. <p>Importantly, the Government has also acted to revitalise its Responsible Pet Ownership program by commencing work to upgrade the register of all pet cats and dogs in NSW (the Companion Animals register).</p> <p>This register will allow pets to be microchipped and registered at the same time, collect vital information about animal breeders and allow pet owners to update their information quickly online.</p> <p>Redevelopment of the register will also facilitate implementation of the Taskforce recommendations to provide information on the advertising and sale of cats and dogs and provide mandatory standardised information on socially responsible pet ownership.</p>

Joint Select Committee on Companion Animals Breeding Practices – recommendations and responses		
REC	DESCRIPTION	RESPONSE
2	The Committee recommends that the NSW Government monitors on an ongoing basis jurisdiction shopping to see if different state compliance regimes result in breeder and breeding dog relocation between states and if so, identifies appropriate responses.	Supported. The Government remains committed to improving animal welfare through better and more coordinated information about breeders and by streamlining the registration process.
3	The Committee recommends that the NSW Government re-examines the recommendation of the NSW Companion Animal Taskforce that dogs and cats be registered on an annual basis.	Supported in part. Consistent with its response to the Companion Animal Taskforce Report response, the Government does not support annual registration in full due to the cost burden on owners. The Government is committed to improving responsible pet ownership and may give further consideration to annual registration for certain categories of dogs and cats as part of its ongoing review of dog and cat registration.
4	The Committee recommends that the NSW Government works with all other jurisdictions to ensure national chip readability across all registers is introduced as a priority.	Supported. The NSW Government remains committed to effective cross jurisdictional regulation.
5	The Committee recommends that the NSW Government undertakes a comprehensive study of euthanasia rates to determine: the breed and source of animals entering pounds and those being euthanised; whether current litter restrictions impact on abandonment and euthanasia rates; what information should be recorded to allow euthanasia rates and trends to be better understood; and the impact of rehoming and low kill policies on euthanasia rates.	Supported. The Office of Local Government will work to progress this issue.
6	The Committee recommends that the NSW Government, through the Animal Welfare Advisory Council, reviews The Animal Welfare Code of Practice – Breeding dogs and cats to determine whether current lifetime and periodic litter restrictions, regulating animal numbers per enclosure, and introducing mandatory desexing of animals which have reached the end of their breeding lives, achieve acceptable animal welfare outcomes.	Supported. The Animal Welfare Advisory Council (AWAC) has been tasked and is currently undertaking the review to provide advice to the Minister for Primary Industries.
7	The Committee recommends that the NSW Government, through the Animal Welfare Advisory Council, reviews The Animal Welfare Code of Practice – Breeding dogs and cats to determine whether introducing a staff to animal ratio for breeding facilities would improve animal welfare outcomes.	Supported. The Animal Welfare Advisory Council (AWAC) has been tasked and is currently undertaking the review to provide advice to the Minister for Primary Industries.

Joint Select Committee on Companion Animals Breeding Practices – recommendations and responses		
REC	DESCRIPTION	RESPONSE
8	The Committee recommends that the NSW Government amends the Animal Welfare Code of Practice – Breeding dogs and cats to mandate an on-site residency requirement for staff at breeding establishments equivalent to the Victorian code of practice as a minimum standard.	Not Supported. The Government agrees that there should be adequate supervision and monitoring at breeding establishments, however there are various ways of monitoring animals without the requirement to reside at the premises.
9	The Committee recommends that the NSW Government completes and implements the digitisation and reform of the register of Companion Animals by end July 2016.	Supported. The Government is committed to introducing a 'one step' online registration system. Implementation of the Companion Animals register will be phased in from July 2016.
10	The Committee recommends that the NSW Government introduces a breeders' licensing scheme with the following elements: a) A comprehensive database of breeders b) A system of periodic audits and spot inspections c) Sets the number of animals that each breeding establishment may keep d) A breeders' licensing identification must be included in any advertisement in any medium where animals are advertised for sale e) Licenses every breeder and provides an auditable licence trail for every sale f) Records a breeder's licence number when an animal is microchipped.	Supported in part. A stand-alone breeders' licensing scheme is not supported. The redesign of the register and registration system in consultation with key stakeholders will ensure that breeder details are captured and linked to animals they breed at point of microchipping, while minimising regulatory burden on breeders and improving the ability to better target problem breeders.
11	The Committee recommends that the breeders' licensing scheme should meet the following objectives: a) Breeder performance meets both Breeding Code baselines and continuous improvement goals b) Breeder-sourced dogs appear in pounds in declining rates c) Compliance levels meet improvement goals d) Non-compliant breeders are identified and made compliant or closed down e) Microchipping rates increase f) Lifetime registration is meeting objectives.	Supported in part. The redesign of the register and registration system in consultation with key stakeholders and via the Reference Group will ensure that breeder details are captured and linked to animals they breed at point of micro-chipping. Further consideration will be given to mechanisms to provide additional resources to puppy factory enforcement by the Minister for Primary Industries.

Joint Select Committee on Companion Animals Breeding Practices – recommendations and responses		
REC	DESCRIPTION	RESPONSE
12	The Committee recommends that the NSW Government reviews the current microchipping system to determine if the system is reliable or open to abuse, and if the system can be improved to better support digitised registration, and report by 1 September 2016.	Supported. The Government is committed to introducing a 'one step' online registration system. This recommendation will be considered as part of the Companion Animals register rebuild.
13	The Committee recommends that the NSW Government digitises both microchipping and registration, and combines microchipping and first registration into a single step, and completes any additional digitisation requirements within the timeframe of its project to redesign the Companion Animal register.	Supported. The Government is committed to introducing a 'one step' online registration system.
14	The Committee recommends that the NSW Government includes as a function of the digitised registration system, the capacity to generate automatic electronic annual reminders to all owners and breeders in order for details including change of address, change of owner, and death of animal to be updated in a regular and timely manner.	Supported. The Government is committed to introducing a 'one step' online registration system that will allow dog and cat owners to update their pet's details. This will be phased in as part of the redesign of the Companion Animals register.
15	The Committee recommends that the register of Companion Animals be made partially publicly accessible online to enable anyone to verify breeder details.	Supported. The Government is committed to introducing a 'one step' online registration system.
16	The Committee recommends that the NSW Government reviews the need for breeders to be trained and qualified, and report by 1 September 2016.	Supported. The Animal Welfare Advisory Council (AWAC) has been tasked and is currently undertaking the review to provide advice to the Minister for Primary Industries.
17	<p>The Committee recommends that the NSW Government reviews the Animal Welfare Code of Practice – Animals in Pet Shops to determine what needs to be strengthened, with a particular focus on:</p> <ul style="list-style-type: none"> • Animal rehoming targets for rescue and shelter-sourced dogs and cats • Limits on the hours when animals can be displayed in stores • No detention of dogs, cats and other prescribed mammals in stores out of hours. Dogs, cats and other prescribed mammals must not remain in the pet shop after closing time. They must be taken to a place where there is appropriate housing and provided with the opportunity to exercise and socialise, whether on the same premises or elsewhere • Appropriate objectives for socialisation, exercise, light and space 	Supported in part. The Animal Welfare Advisory Council (AWAC) has been tasked and is currently undertaking the review to provide advice to the Minister for Primary Industries. The Animal Welfare Code of Practice: Animals in Pets shops already includes enforceable standards relating to protection from distress, injury, ensuring their safety, wellbeing and psychological health. Failure to comply with the standards may result in a Penalty Infringement Notice (PIN) or prosecution.

Joint Select Committee on Companion Animals Breeding Practices – recommendations and responses		
REC	DESCRIPTION	RESPONSE
	<ul style="list-style-type: none"> An upper limit on the time any animal can spend for sale in a store before it must be rehomed through another process Whether the Pet Industry Association of Australia Code, the Pets For Us Code and the Pets Australia Code represent a suitable baseline for upgrading the NSW Government animal welfare codes. 	
18	The Committee recommends that the NSW Government reviews training requirements for pet store staff, and report by 1 September 2016.	Supported. The Animal Welfare Advisory Council (AWAC) has been tasked and is currently undertaking the review to provide advice to the Minister for Primary Industries.
19	The Committee recommends that the NSW Government examines whether there is value in accrediting any pet retail industry association/s in order to capture standalone retailers and bring them within the ambit and discipline of association rules, and report by 1 September 2016.	Supported. The Animal Welfare Advisory Council (AWAC) has been tasked and is currently undertaking the review to provide advice to the Minister for Primary Industries.
20	The Committee recommends that the NSW Government examines the costs and benefits of a standalone pet shop licensing system to be applied to all pet shops, including ongoing monitoring, welfare performance and rehoming targets, and audit requirements, and report by 1 September 2016.	Supported. The Animal Welfare Advisory Council (AWAC) has been tasked and is currently undertaking the review to provide advice to the Minister for Primary Industries.
21	The Committee recommends that the NSW Government legislates that all animals advertised for sale via any medium must include an identifying number, which may be a microchip number, a Companion Animal register number or a breeders' licence number, which identifies the animal and/or breeder, by end July 2016.	Supported. Implementation will be in conjunction with proposed redesign of the register and registration system to enable a breeder identification number to be used on advertising in lieu of multiple microchip numbers. As a consequence, it may not be implemented in the specified timeframes.
22	The Committee recommends that the NSW Government legislates that all council development control plans be amended to ensure that local council approvals are consistent with the Prevention of Cruelty to Animals Act 1979 (NSW) Animal Welfare Codes of Practice as a minimum standard, by 1 September 2016.	Not supported. Intent will be implemented by alternative means. The content of development control plans is not currently legislated. The Government will instead prepare a circular or notice that can be issued to all NSW councils advising them to consider the Animal Welfare Code of Practice when assessing development applications for 'animal boarding house or training establishment'.
23	The Committee recommends that the NSW Government introduces mandatory notification by councils to enforcement agencies of development consents for companion animal breeding establishments, by 1 March 2016.	Not supported. The outcome of all development applications is already regularly published on councils' websites. The Government will instead prepare a circular or notice that can be issued to all NSW councils advising them to consider the Animal Welfare Code of Practice when assessing development applications

Joint Select Committee on Companion Animals Breeding Practices – recommendations and responses		
REC	DESCRIPTION	RESPONSE
		for 'animal boarding house or training establishment' and that Councils can seek advice from enforcement agencies. Intent will also be met through the redesigned register to capture breeder information. This avoids additional regulatory burden for councils.
24	The Committee recommends that the NSW Government removes the term 'for commercial purposes' from the local environment plan definition of 'animal boarding house or training establishment' by 1 March 2016.	Not supported. Changing the definition in local environmental plans will have wider implications across the State, requiring development applications for more proposals which is inconsistent with the Government's strategy to streamline the planning system. Alternate options to implement the intent of this recommendation will be investigated.
25	The Committee recommends that appropriately trained local government rangers be given the prescribed powers under section 4(1) 'definition of officers' of the Prevention of Cruelty to Animals Act 1979 (NSW).	Not supported. RSPCA NSW and AWL NSW have prescribed powers under POCTA and the Government provides funding to these welfare organisations. Enforcement operation procedures under POCTA require different capabilities to local rangers and implementation of this recommendation would greatly increase demand on resourcing for local government.
26	The Committee recommends that the NSW Government reviews the adequacy of penalties, the method of mounting and funding prosecutions, current arrangements for the payment of moieties and cost recovery, and a requirement to ensure regulators will not be out-of-pocket in pursuing prosecutions, and report its findings by 1 March 2016.	Supported. Further scoping is required on the complexity of these issues and a longer timeframe will be required.
27	The Committee recommends that the NSW Government legislates that animal welfare penalty and prosecution provisions be amended so that they can attach to businesses, addresses, and close associates of defendants, and not just to an individual, by 1 March 2016.	Supported in part. Further scoping is required on the complexity of these issues and a longer timeframe will be required. This will be considered as part of the review of all offences proposed by recommendation 26.
28	The Committee recommends that the NSW Government reviews all animal welfare and regulatory offences including microchipping, failure to register, selling and advertising, non-desexing, cruelty, litter control and code compliance, and report on recommended changes by 1 September 2016.	Supported in part. The Government is periodically reviewing the Companion Animals Act to ensure penalties and offences align with community expectation. It has increased penalties for dog attack offences and created a new menacing dog category. The need for a more comprehensive review can be re-examined after the implementation of the register.
29	The Committee recommends that the NSW Government reviews the Prevention of Cruelty to Animals Act 1979 (NSW) and the Companion Animals Act 1998 (NSW) and identifies opportunities	Supported in part. The Government recognises the benefit of undertaking an integrated review of the two Acts. The need for such a review will be re-examined

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REC	DESCRIPTION	RESPONSE
	for the acts to be streamlined to ensure more seamless operation across the acts, agencies and regulators, including harmonisation of objectives, elimination of inconsistencies, and common definitions, and report by 1 September 2016.	after the implementation of the register.
30	The Committee recommends that the NSW Government reviews the adequacy of funding for the Royal Society for the Prevention of Cruelty to Animals NSW and the Animal Welfare League NSW, and reports by 1 March 2016.	Supported. The Government is committed to reviewing the adequacy of funding when possible. The data collected through the revised Companion Animals register may assist in determining the most effective use of current resources, the need for any additional resources and where they should be targeted.
31	The Committee recommends that the NSW Government identifies cost savings to be achieved by the redesign of the Companion Animal register, and works with local councils to ensure that funds received from registration fees and distributed via the Companion Animal Fund are adequate for ensuring animal management targets and objectives are achieved.	Supported. The Government remains committed to implementing a new 'one-step' registration system.
32	The Committee recommends that the NSW Government creates a common database for enforcement agencies to ensure the locations of all breeding establishments, and all reports of animal cruelty, and details of site visits, outcomes and prosecutions are kept and maintained centrally, by 1 March 2016.	Not Supported. Intent will be met by individual Memorandums of Understanding (MOU's) between the Department of Primary Industries (DPI) and the RSPCA and Animal Welfare League (AWL) NSW. The MOUs will address issues of appropriate governance systems, policies and information sharing in 2016. The register will provide location of breeders.
33	The Committee recommends that the NSW Government develop protocols to ensure efficiency of operation and removal of duplication between the enforcement agencies.	Supported. The MOUs between DPI and RSPCA NSW and AWL NSW will address issues of appropriate governance systems, policies and information sharing in 2016.
34	The Committee recommends that the NSW Government introduces a single information entry point for companion animal matters including for customers, breeders, sellers, regulators, cruelty reporters, rescuers, rehoming, and advocates, by 1 March 2016.	Not supported. The redesign of the register will enable better tracing of breeders and will provide an online tool to investigate/check the identification number of breeders for any consumers wishing to purchase animal. The Government will review and maintain information and linkages between relevant websites.