

Submission
No 23

**INQUIRY INTO PUPPY FARMING IN NEW SOUTH
WALES**

Name: Name suppressed

Date Received: 6 March 2022

Partially
Confidential

The Honorable Mick Veitch
Chair Select Committee on Puppy Farming in NSW
Parliament of NSW

Companion Animals Amendment (Puppy Farm) Bill 2021

Thank you for the opportunity of to offer feedback to the Companion Animals Amendment (Puppy Farm) Bill 2021, our concerns are provided herein.

1. We are upstanding members of the community and with professional backgrounds in Science, research and education. As members of DogsNSW we have enjoyed the hobby of showing, breeding and judging dogs for over 30 years, in particular the physical and mental health benefits associated with this recreational hobby. We are not commercial, never profited and in fact spent hundreds of thousands of dollars preserving the quality and health of our dogs by importing dogs and frozen semen and more.
2. The welfare of all animals is our greatest concern. As Members of DogsNSW we are obligated to comply with the Companion Animals Act 1998 (NSW) and the Prevention of Cruelty to Animals Act 1979 (NSW).
3. Concerningly the Companion Animals Amendment (Puppy Farm) Bill 2021 has no definition of what a 'Puppy Farm' is in relation to this Bill.

Part 6A Division 1 Section 61A Definitions

4. The definition of 'microbreeder' is unreasonable and too restrictive. It would be impossible for a preservation breeder to sustain genetic variation with only one of two fertile females. In my breed there are only 4 active breeders in the Nation. Such a limitation would see my breed effectively die out within NSW. There is also no consideration given to a person who keeps more than one breed, and or cats and dogs.

Not all fertile bitches are actually bred with, some are kept just as show dogs/companions. A puppy may be retained to access suitability for showing and or health testing at the required older age (e.g. Test for Progressive Retinal Atrophy in American Cocker Spaniels is done at 2 years of age or older). It is unreasonable that in these circumstances they be considered in the total breeding number for fertile bitches.

Section 61B

5. There is now lawful justification for this and it gives no consideration to an existing contract between a dog breeder and purchaser.

Section 61C

6. Existing legislation already covers this. Husbandry and record keeping are covered under the

Prevention of Cruelty to Animals Acts 1979.

Division 4 Section 61T

7. DogsNSW Members are required to microchip their puppies for the purpose of registration under the Companion Animals Register/Pet registry (Companion Animals Act 1998).

This Bill fails to address companion animal Breeders that do not comply with existing legislation.

Section 61ZF

8. There is no justification as to why an otherwise healthy fertile bitch may only be bred twice in its lifetime. Many breeds of dog (particularly the smaller breeds) only ever have 1 or 2 puppies. The inference that welfare is compromised by litter amounts is without evidence or merit.
9. There is no definition here of what quantifies 'related by blood'. Under this definition an entire species is considered to be related by blood. The inference that closely related breedings between blood relatives pertains to welfare issues is unfounded and without scientific basis.
10. Modes of inheritance differ for varying genetic conditions. This section gives no consideration to this eg an autosomal recessive condition where the condition does not express itself in the carrier and can be bred without re-occurrence by unaffected partner selection.

This Bill is poorly drafted and does nothing to address the actual intended issues, that being 'Puppy Farms'. If anything it will contribute to the problem by slowly phasing out responsible registered Breeders. In the case it is highly unfair to the Public to force them to only be able to purchase a puppy from a welfare or rescue group (the venues where the actual results of puppy farms are present).

Thank you for your consideration. Please do not hesitate to contact us should you require any further information.

Kindest regards,