

**Submission
No 34**

INQUIRY INTO PUPPY FARMING IN NEW SOUTH WALES

Organisation: Animals Australia Federation

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Select Committee on Puppy Farming in NSW
Parliament House
Macquarie Street
SYDNEY NSW 2000

Submitted online: <https://www.parliament.nsw.gov.au/committees/inquiries/>

Dear Committee Members,

**Animals Australia's Submission regarding the
*Companion Animals Amendment (Puppy Farms) Bill 2021***

Thank you for the opportunity to provide feedback on the NSW *Companion Animals Amendment (Puppy Farms) Bill 2021 (the Bill)*.

Animals Australia is a peak animal protection organisation in Australia. On behalf of our individual members and supporters we are pleased to be able to provide this submission.

Animals Australia strongly supports the Bill's primary aims and particulars which are to address the serious animal welfare issues and the consumer issues which arise through commercial (puppy farming) and private breeding of dogs and cats - including pet shop and online sales of these vulnerable animals.

We are pleased and supportive that the Bill is modelled on the Victorian model in this regard, as we have held concerns about the movement of Victorian puppy farmers into NSW to escape the new Victorian puppy farm laws. A consistent cross-jurisdictional approach is overdue and urgently required.

We support the amendments to the *Companion Animals Act 1998 (the Act)*. In particular, we support and commend the following amendments:

- Limits on the number of fertile female dogs that breeders can keep to ten, which include contractual breeding arrangements.
- Limits on the number of litters permitted per female. We note that the Bill caps the limit to two litters. This is less than Victoria but based on recommendations from animal welfare experts. We commend the Bill for underwriting this requirement with expert evidence and an intention to maximise the welfare and quality of life for the breeding females after their 'use' has ceased.
- The requirement for mandatory vet checks annually, and before and after breeding.

- The minimum requirement of one staff member to five animal ratio. We are satisfied that this recommendation is supported by the EU Platform on Animal Welfare Responsible Breeding Guidelines.¹
- Pet shops only being permitted to sell dogs and cats sourced from shelters and pounds;
- The requirement for a central registry of 'source numbers' to provide tracking, transparency and oversight for the general public and for authorised officers.
- The recognition of the important role of foster carers, and the requirement for them to also register with a 'source number'.
- The requirement for all breeders (with three or more breeding animals) to be registered with their local council and includes annual inspections.
- The result that councils will have greater information and therefore greater monitoring of dog and cat breeding operations in their areas.

Animals Australia holds a number of serious long-standing concerns about the welfare of animals in the companion animal breeding industry and believes that the current breeding and pet shop system worsens the already high rates of overbreeding and subsequent euthanasia of companion animals.

Australians love their dogs and cats and most, if not all, Australians are horrified when they discover how a large percentage of kittens and puppies are bred for the animal trade. That is, bred in intensive breeding conditions that fail to meet the animals' behavioural, social and physiological needs. Further, Australians are equally horrified when they discover that tens of thousands of unwanted pets are euthanised in pounds and shelters across Australia each year.

The community has seen the squalor and the terrible effect on the animals involved in puppy farms and in unmonitored breeding facilities - large and small, and there are many animals continuing to suffer. We know this primarily through the important work of rescuers, and we welcome the NSW Government now acting to improve conditions through this legislation in line with the important developments that have taken place in Victoria.

Despite there being no specific scientific evidence that 10 or less fertile females would increase welfare in this regard, there are many scientific studies that show the detrimental impact of breeding environments on dogs and puppies.

In mid-2016, animal scientists at Newcastle University (UK) presented the first UK study looking at how the early weeks of a dog's life spent in a puppy farm affects its temperament and behaviour as an adult. They found that dogs bred on puppy farms were more aggressive, more fearful of other dogs and more likely to suffer separation anxiety as adults than dogs from reputable breeders.

¹ Available [here](#).

Lead researcher on the study, Dr Catherine Douglas, stated²:

“We found that across all behaviour categories, including trainability, dogs from less responsible breeders had significantly less favourable behaviour and temperament scores than puppies from responsible breeders - those following good practice such as that outlined in the RSPCA, British Veterinary Association and Animal Welfare Foundation’s Puppy contract.

“The results were what most owners, welfare scientists and behaviourists would have suspected, but until now the evidence has been anecdotal. Hopefully this new evidence will further encourage potential owners to do thorough research before getting a puppy.”

“Fundamentally, animals destined to interact with humans and the world should not be reared in puppy farms and no breeding animal should be kept in such confinement. The welfare of both puppy and parents should be put above profit and the more the public know about this the more likely they will source their dog from a responsible home to give it the best chance in life of being a successful companion.”

Therefore, the more a breeding environment can provide breeding dogs with an enriched family-oriented domestic environment, the better. This naturally and logically comes with decreasing the number of dogs in a breeding environment so that greater attention and care can be afforded to each animal.

It is in the interests of animal welfare for there to be no more than 10 breeding dogs or cats at each facility. The RSPCA consistently reports that overcrowding in companion animal breeding facilities creates a number of animal welfare issues, including: unhygienic living environments; increased spreading of contagious diseases and illnesses; increased chances of parasites; and psychological issues that can have a later impact on the chances of the animal being rehomed.

Further, pet shops are a highly inappropriate environment for vulnerable puppies and kittens recently separated from their mothers and siblings. Responsible breeders do not (usually) sell puppies and kittens via pet shops which then makes pet shops a channel for unscrupulous breeders.

In a study published in 2016, *Pirrone et al* titled ‘Owner-reported aggressive behavior towards familiar people may be a more prominent occurrence in pet shop-traded dogs’ in the *Journal of Veterinary Behaviour* (2016) the authors found that³:

² Rebecca Gray, Catherine Douglas, Sophie Butler and James Serpell, “Do puppies from ‘puppy farms’ [puppy mills] show more temperament and behavioural problems than if acquired from other sources? Using CBARQ to assess” Presented at *British Society of Animal Science* “Annual Conference”, Chester, UK, 6th April 2016. And also at the Universities Federation for Animal Welfare’s (UFAW’s) Recent Advances in Animal Welfare Science in York on June 23rd 2016: <http://www.ufaw.org.uk/downloads/york-2016---programme-and-abstracts-23-june.pdf> [see page 58]. domestic environment, the better. This naturally and logically comes with decreasing the number of dogs in a breeding environment so that greater attention and care can be afforded to each animal.

“There is long-standing recognition of the adverse effect of stressful experiences during early critical developmental periods and the later association with problematic behavioral issues in dogs. The aim of this study was to evaluate whether the origin/source of puppies (pet shop vs. breeder) was associated with later potential problematic behaviors.

...

The odds of displaying owner-directed aggression were significantly greater for the dogs that had been purchased from a pet store as puppies than those purchased from a breeder (control group). We also found an association between a dog’s pet store origin and other potential problem behaviors, including house soiling, body licking, and separation-related behavior, but this relationship was confounded by the effect of a set of owner-related factors. These findings indicate that obtaining puppies from pet stores may predispose them to potentially exhibit owner-directed aggression as adults. We suggest that further research in prevention of problem behaviors in adult dogs should be aimed at identifying the root causes of pet store-related behavioural issues, without ignoring confounding at a household level.”

The lack of a mandatory breeder permit number and the ability to sell the animals with easy anonymity (and blank microchips), makes tracing the source of the animals virtually impossible.

This lack of ability to determine the source of the animals contributes considerably to the uncontrolled breeding currently taking place, and the breeding of dogs and cats in inadequate conditions.

A mandatory and searchable register of all domestic animal businesses / breeders / brokers would be a significant step forward in stamping out bad breeders and would support consumer protection. Consumers buying puppies/kittens from pet shops have no real way of knowing the source of those animals.

In addition to our support of the Bill’s significant improvements to the breeding and rearing of dogs and cats in NSW, we make the following submissions:

- We implore the Committee to consider the Victorian Code of Practice for the Operation of Breeding and Rearing Businesses (2014).³ Victoria made amendments to this Code following the commencement of new breeding provisions under the *Domestic Animals Amendment (Puppy Farms and Pet Shops) Act 2017*. The Code is aligned with the significant improvements made in Victoria, however we qualify that no more than *an absolute maximum* of ten breeding females would be permitted where the Victorian Code allows up to 50 females but with greater scrutiny of those operations. We do not support this aspect of the Code.
- We implore the Committee to consider retirement requirements for the males used for breeding. We qualify here that although the Victorian Code provides that males are to be retired after six years of age (unless they have a vet certificate that they are healthy and able to continue breeding), we do not agree

³ Available [here](#).

with this provision as these dogs remain in the welfare-compromised conditions of these puppy farms and breeding environments, which have an adverse effect on their welfare.

- We also implore the Committee to consider mandatory training for breeders and rearers in line with the Victorian requirements. Such training must be completed before any permits are granted.

Please contact me if you require additional information or references.

Yours sincerely,

Glenys Oogjes

Chief Executive Officer
Animals Australia Federation