

Submission
No 122

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

Name: Name suppressed

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Partially
Confidential

I'm a hobby breeder and member of Dogs NSW who owns and shows a toy breed dog that averages between 1 and 3 puppies per litter.

I feel this bill has been put together by people who have no idea about what it takes to properly breed dogs and should be written in consultation with those that do. My biggest concern is with section 61ZF and 61ZG.

61ZF states that "Proprietors of companion animal breeding businesses must not breed dogs or cats in certain circumstances

A proprietor of a companion animal breeding business must not breed from a female dog or cat in the following circumstances—

(a) more than twice,

This would severely limit the gene pool available to breeders and in turn, affect the average person looking for a dog or cat as a pet.

As a preservation breeder, I would rarely repeat a mating, therefore every litter will be slightly different to the last, which increases the genetic variability amongst my lines and ensures that I can plan future matings utilising line breeding techniques if I choose. Linebreeding is a valuable breeding tool to ensure predictability in type for future generations of dogs, without it, there could potentially be so much variability and unpredictability in each litter that it would be virtually impossible to improve and "preserve" breeds as they should look.

With a breed such as mine which averages between 1 and 3 puppies per litter, each puppy would be infinitely more precious if we were limited to two litters.

I breed with the intention to progress my own breeding program, therefore I look to keep a puppy each time I do a mating. If there is one puppy in one of the two matings I would be allowed then that puppy would stay on with me. If the stud I had used for that mating belonged to another breeder then the convention would be a return mating with a puppy in the second litter going back to the stud owner. If the second mating also produced a singleton then there would be nothing for sale, ie. no monetary gain, or more likely no way to cover costs such as caesarians, vaccinations, health testing, registration, show entry fees etc and possibly no real way to plan future line breedings, particularly if one of the puppies doesn't "turn out".

For this reason the current dogs NSW code is more practical. It states a limit of 6 litters per bitch, however, most breeders will breed a bitch 3 or 4 times before retiring her.

With all this said, pet buyers will also lose out, there will be much fewer animals available to pet homes as breeders will be more reluctant to let puppies and kittens go with only two litters allowed to them over the life of the bitch. There is already an issue with supply of well-bred dogs, as witnessed by the high prices for puppies at the moment, it's a case of supply and demand. If supply were to decrease further, pet ownership would slip even further out of reach for the average Australian. I have already heard many people say that they can't afford to get a puppy, particularly pensioners who benefit greatly from the companionship.

Limiting the number of litters to two per bitch would also have the knock-on effect of limiting the gene pool as importing new bloodlines would be less financially viable, particularly importing good quality bitches. At around \$30,000 (or more) per imported dog, the bloodlines for breeds like mine would eventually become so small that they would be unsustainable.

(b) if a heritable defect is identified in a previous litter of the dog or cat,

Some combinations don't work. A more logical approach would be to use a different stud over a bitch if there was a heritable defect in a previous litter, sometimes it's that particular combination of genes that hasn't worked. Once again, this would limit the gene pool in an already limited gene pool if this was to come into effect.

(c) with a dog or cat that is related to the dog or cat by blood."

Most of the dogs in each breed are related to each other by blood somewhere in their pedigree. This one would essentially prevent breeding of any animals at all.

61ZG Proprietors of companion animal breeding businesses must ensure ratio of staff to companion animals kept on registered premises

(1) A proprietor of a companion animal breeding business must ensure that, at all times, there is at least 1 staff member at the proprietor's registered premises for every 5 animals kept at the premises.

It's common practice for breeders of toy breeds to keep 15 or more dogs at any given time including puppies and retirees. This would essentially mean having to get rid of all the geriatrics and potentially not being able to keep enough puppies to properly continue a breeding program. I personally might keep/buy 5 puppies in any given year, but be left with only one or even none of them by the time those dogs would be 2 or 3 years old. It might take a year or two to see whether they have turned out, as dogs will go through a gangly teenage stage and be difficult to assess until they're sufficiently mature. As breeders, we need the freedom to be able to go through that assessment process, and it won't always be possible for us to keep 2 or 3 staff in order to do that, particularly with breeds such as mine in which you would need to have 3 puppies per litter just to cover costs as they stand already (one for the breeder, one for the stud owner and one to sell to cover costs).

Not to mention how heartwrenching it would be to have to give up the older dogs to make way for breeding dogs. I know my dogs are pets first and I couldn't give up any of my retirees who have been with me from the beginning, and I shouldn't be forced to. People like me would give up hobby breeding before giving up our pets, further limiting the number of preservation breeders keeping breeds going for future generations.

Hobby breeders spend years researching their breeds, the pedigrees, breeding techniques, different dogs, different kennels, health testing, proving their dogs in the ring etc. I strongly believe those who are involved in writing this bill need to have the same level of knowledge and dedication to the subject to properly protect our breeds which will be affected by this bill.