

Submission  
No 223

## INQUIRY INTO PUPPY FARMING IN NEW SOUTH WALES

**Organisation:** Kellyville Pets

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# Inquiry Into Puppy Farming in NSW 2022

## Submission

### Kellyville Pets & associated business Rockley Valley Park PTY LTD

Kellyville Pets is a Companion Animal Centre that specialises in educating new pet owners on the right way to include a pet into your family. We match the correct companion pet to Australian Families in a highly transparent and ethical manner where animal welfare is at the forefront.

Out of necessity, we have also established a highly transparent Dog breeding facility near Bathurst and have approval to house up to 60 breeding dogs. We built Rockley Valley Park as a “best practice facility” that highlights the need for not only the physical care of breeding dogs, but the social and phycological health of breeding dogs in a resort style environment. The facility operates a dog Guardian program where the majority of our breeding dogs live in family homes under a transparent system.

[www.rockleyvalleypark.com.au](http://www.rockleyvalleypark.com.au)

[www.kellyvillepets.com.au](http://www.kellyvillepets.com.au)

### The facts about the status of pet ownership in Australia

If we are to achieve good animal welfare outcomes, legislation must be amended based on facts, science, and experience, not on emotions or alternative agendas. Some supported facts about the industry.

- Australia has one of the highest pet populations in the world where 69% of households own a pet of some kind. Demand is predicted to increase
- It is estimated the demand for puppies/ dogs in NSW is 130,000 pa (based in 2017, much higher now)
- Pets play an important role in people’s lives and there are many mutual proven health benefits in including a pet in your family. Families who own pets are less likely to suffer depression/ heart disease/ cancer etc
- Unnecessarily restricting breeders will force the pricing of dogs to be out of reach for the average Australian
- The demand for pets requires adequate numbers of ethical breeders and a workable framework must be devised within legislation to ensure both welfare and sustainability.
- Regulated Pet shops equate to less than < 5% of all puppy sales, where unregulated online sales equate to >50%
- We have continually encouraged legislators to amend welfare regulations to eliminate poor breeding practices especially for the breeding of dogs.

- A puppy farm isn't a hobby or commercial breeder of dogs. The accepted definition of a puppy farm is the RSPCA's definition.....

***'an intensive dog breeding facility that is operated under inadequate conditions that fail to meet the dogs' behavioural, social and/or physiological needs'***

The solution to eliminating puppy farms isn't to ban everything or restrict it to become unviable. The supply of dogs will not be adequate if you restrict them to only amateur based supply as this bill suggests. Effectively this bill will enforce 'impossible to regulate' backyard breeding as it seems to have done in VIC.

Interestingly, the bill does not acknowledge that the new stringent Victorian puppy farm legislation 2017 recognised that a 10-dog breeding system doesn't work on its own as they had to also include a 50-dog commercial breeder permit to satisfy the demand for dogs in Victoria.

We believe the only way you can eliminate puppy farms is to introduce a tiered self-funded dog/ cat breeder license system (i.e. the larger the breeder, the more frequent are the audits. Audits to be done by a third-party authority auditor such as RSPCA and the AWL and the costs covered by the breeder)

### **Specific objections to the bill**

- The banning of puppies in pet shops will simply drive additional sales to online where it is far more difficult to regulate. Pet shops are the most transparent sector of the pet industry as they are open 7 days per week, are under constant public scrutiny and can be audited by an authority (such as RSPCA/ AWL) without notice. It simply doesn't make sense to ban them when we could impose a self-funded licencing system and tougher regulations.
- The Bill ignores that Pet stores already have safeguards in place with current codes of practice and traceability via microchipping
- Restricting breeders to 10 breeding dogs will create a significant increase in back yard breeding where welfare cannot be regulated easily. The proposed changes will create a shortage of puppies/ dogs and a further inflation of prices and encouraging a black-market trade. It is common knowledge amongst organisations such as the RSPCA and the AWL that poor dog breeding practices can be with any number of dogs from a single dog upwards. In many cases puppy farmers exist with 10 dogs or less and even harder to identify.
- The restriction of numbers of breeding dogs within a guardian program is totally unacceptable. This form of breeding practice ticks every box of welfare, where a breeding dog gets to live in a family home and are bred by an experienced breeder at the breeder's premises for a limited number of litters. The breeding dog is then desexed and becomes the family pet once breeding is complete. We should be encouraging this practice more rather than restrict it.
- The staff to dog ratio 1 person to 5 dogs is an outrageous unnecessary cost burden on breeders designed to make breeding unviable. Shelters who have higher maintenance dogs compared to breeding dogs (often due to incompatibility of shelter dogs) work with a ratio of 1 staff member to 20 dogs. This staff members is totally dedicated to those dogs for the entire day. The Victorian new legislation allows for a ratio of 1 to 25
- The Bill will mean that animal shelters will be required to hire 4 times the amount of staff to comply.
- The Bill suggests that 2 breeding dogs or less are not important and doesn't need to be captured or held accountable to their practices and skill. A breeder is a breeder irrespective of breed and quantity.

- Capping the litter quantities to a maximum of 2 litters is designed to make breeding unviable. Litter quantities should be capped at 5 and based on pre-mating and post-partum veterinary checks.

## **Conclusion**

Both the NSW and VIC parliamentary enquiries into puppy farms recommended a tiered breeder/pet shop license system and stricter regulation. They both recommended that there is no benefit to welfare to ban pet shops and restricting dog breeders to 10 dogs. Perhaps its time to listen to the experts and the regulators of the industry.

We welcome the committee to tour both our Kellyville Pets and Rockley Valley Park site to see first hand what could be achieved.