

**Submission
No 49**

**INQUIRY INTO 2025 INQUIRY INTO THE OPERATION OF
THE APPROVED CHARITABLE ORGANISATIONS UNDER
THE PREVENTION OF CRUELTY TO ANIMALS ACT 1979**

Organisation: Professional Dog Trainers Australia

Date Received: 20 January 2026

Professional Dog Trainers Australia submission addressing behavioural euthanasia of dogs, examining RSPCA NSW operations under POCTAA, and recommending prevention, rehabilitation, transparency, and balanced enforcement reforms.

Submission to the NSW Parliamentary Inquiry

Into the Operation of the Approved Charitable Organisations under the Prevention of Cruelty to Animals Act 1979



Professional Dog Trainers Australia



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Introduction

Professional Dog Trainers Australia (PDTA) welcomes the opportunity to make a submission to the NSW Parliamentary Inquiry into the operation of the approved charitable organisations under the Prevention of Cruelty to Animals Act 1979 (POCTAA).

This submission is made with specific reference to the Inquiry's Terms of Reference concerning:

The matters contained in the annual reports of the approved charitable organisations, including financial statements;

The exercise of compliance and enforcement functions under the Act; and

Any other related matters relevant to the effective operation of the Act.

PDTA's submission focuses on **canine welfare outcomes**, in particular the **high rate of euthanasia of dogs for behavioural reasons** as reported by RSPCA NSW in its FY2025 Annual Report.

About Professional Dog Trainers Australia

Professional Dog Trainers Australia (PDTA) represents numerous Australian dog trainers, behaviour consultants, and their substantial clientele. Our dedicated members strive to achieve positive outcomes for dogs and owners through effective education and training.

As a collective of Australia's most experienced and educated dog trainers and behaviour consultants, we possess deep knowledge and expertise in dog behaviour, training, and psychology. Our members have a wealth of insights that can drive effective policy, combining formal education, practical experience, and notable achievements in working with dogs.

We are not just a group of professionals, but a community that consistently stays updated on the latest developments in our field. We are frequently sought after for our opinions, advice, and consultation. The PDTA board members alone hold a collective experience of over 200 years. We are dedicated to sharing knowledge, valuing the contributions of each member, through various avenues such as authoring articles, giving talks, conducting research, participating in conferences, and providing training and consultancy services.

By fostering education and informed decision-making, we play a pivotal role in advancing the field of dog training, behaviour modification, and overall management. This directly benefits dog owners, both current and future, within Australia. The PDTA are available for consultation and assistance with legislation development.

Purpose of this Submission

PDTA acknowledges the important statutory and charitable role performed by RSPCA NSW under POCTAA, including enforcement, rescue, sheltering and rehoming.

However, PDTA is concerned that **the scale of behavioural euthanasia of dogs reported in FY2025 reflects systemic gaps in prevention, early intervention and rehabilitation**, rather than unavoidable welfare outcomes.

This submission seeks to assist the Inquiry by identifying how current operational models may unintentionally contribute to preventable loss of canine life and how these outcomes relate to the objectives of POCTAA.

1. Matters Contained in Annual Reports (Terms of Reference 1)

The RSPCA NSW FY2025 Annual Report identifies **behavioural reasons as the leading cause of euthanasia**, exceeding medical and infectious causes. Dogs are disproportionately represented within this category.

From a professional canine behaviour perspective, this is of significant concern. Behavioural issues are not diseases; they are adaptive responses shaped by environment, learning history, stress and handling. In the majority of cases, these behaviours are **modifiable with appropriate, timely intervention**.

High rates of behavioural euthanasia therefore indicate that dogs are being euthanised not because rehabilitation is impossible, but because **current systems are unable to accommodate their needs**.

1.1. Behavioural Euthanasia of Dogs

The RSPCA NSW FY2025 Annual Report identifies behavioural reasons as the leading cause of euthanasia, exceeding medical and infectious causes. Dogs are disproportionately represented within this category.

From a professional canine behaviour perspective, this is of significant concern. Behavioural issues are not diseases; they are adaptive responses shaped by environment, learning history, stress and handling. In the majority of cases, these behaviours are modifiable with appropriate, timely intervention.

High rates of behavioural euthanasia therefore indicate that dogs are being euthanised not because rehabilitation is impossible, but because current systems are unable to accommodate their needs.

1.2. Preventability of Behavioural Outcomes

Behavioural problems in dogs are widely recognised as being associated with:

- Inadequate early socialisation and training
- Owner knowledge gaps
- Housing insecurity and financial stress
- Stress and deterioration associated with prolonged shelter confinement

The Annual Report itself acknowledges:

- Improved behaviour outcomes when dogs are placed in foster care
- The benefits of enrichment, quiet-time initiatives and post-adoption support
- Despite this, behavioural intervention capacity remains limited relative to need, particularly before dogs enter shelters or enforcement pathways.

2. Compliance and Enforcement Functions under POCTAA (Terms of Reference 2)

2.1. Enforcement Activity and Canine Behavioural Outcomes

PDTA recognises the importance of enforcement under POCTAA and the critical role of inspectors in responding to cruelty.

However, the expansion of enforcement activity has resulted in:

- Increased seizure of dogs
- Extended legal holding periods
- Reduced opportunities for timely rehoming or rehabilitation

Dogs seized under enforcement powers frequently experience prolonged confinement, uncertainty and stress. Without sufficient behavioural rehabilitation resources, these conditions can lead to behavioural deterioration, reducing adoptability and increasing euthanasia risk.

PDTA submits that enforcement capacity has expanded faster than behavioural rehabilitation capacity, creating an unintended welfare bottleneck.

2.2. Alignment with the Objects of POCTAA

The POCTAA is intended to prevent cruelty and promote animal welfare. PDTA submits that euthanising dogs for behavioural reasons — where those behaviours are preventable or treatable — is inconsistent with the spirit and intent of the Act.

A compliance model that prioritises enforcement without proportionate investment in rehabilitation risks producing outcomes that, while lawful, undermine animal welfare objectives.

3. Other Related Matters (Terms of Reference 3)

3.1. Limited Access to Early Behaviour Intervention

While RSPCA NSW has established an Animal Behaviour Clinic, the Annual Report indicates that **only 154 behavioural consultations** were delivered statewide in FY2025. This figure is small relative to dog intake volumes and behavioural euthanasia rates.

PDTA submits that behavioural support is being accessed too late, often after surrender or seizure has already occurred.

3.2. Shelter Environment Limitations

It is well established that shelter environments can exacerbate fear, anxiety and reactivity in dogs, particularly:

- Large breeds
- Working breeds
- Dogs with pre-existing behavioural sensitivities

The Annual Report notes improved behaviour outcomes in foster care, yet foster capacity, particularly for dogs with behavioural challenges, remains limited.

3.3. Absence of a Dog-Specific Prevention Strategy

The NSW Government has supported large-scale, evidence-based prevention programs for cats. PDTA notes the absence of an equivalent, well-resourced dog-specific prevention framework, despite dogs being:

- Central to cruelty complaints
- Highly vulnerable to behavioural euthanasia
- More complex to rehabilitate once issues escalate

3.4. Implications for Public Confidence

High rates of behavioural euthanasia for dogs have contributed to:

- Negative media coverage
- Public criticism and mistrust
- Moral distress among staff, volunteers and foster carers

Without greater transparency and reform, these outcomes risk undermining confidence in approved charitable organisations performing statutory roles under POCTAA.

4. Recommendations

PDTA respectfully recommends that the NSW Government and this Inquiry consider the following:

4.1. Mandated Early Behaviour Intervention Pathways

- Funded referrals to qualified dog trainers prior to surrender
- Behavioural triage as an alternative to immediate intake
- Partnerships with accredited trainers statewide

4.2. Expansion of Behaviour-Capable Foster Care

- Incentives for foster carers willing to take dogs with behavioural challenges
- Access to professional trainer support for foster homes
- Reduced reliance on prolonged kennel confinement

4.3. Enhanced Transparency in Euthanasia Reporting

Public reporting of canine euthanasia by:

- Behaviour category
- Length of stay
- Intake source (owner surrender, seizure, council transfer)
- Independent review mechanisms for behavioural euthanasia decisions

4.4. Development of a NSW Dog Welfare Prevention Strategy

Equivalent in scale to existing cat welfare initiatives

Focused on:

- Early socialisation and training
- Owner education
- Housing and rental stability
- Access to behavioural support

4.5. Alignment of Enforcement Funding with Rehabilitation Capacity

Ensure future enforcement funding includes matched investment in:

- Behavioural rehabilitation

- Trainer involvement
- Foster program expansion

5. Conclusion

Professional Dog Trainers Australia submits that high rates of behavioural euthanasia for dogs are not inevitable. They reflect systemic gaps in prevention, early intervention and rehabilitation that fall within the scope of this Inquiry.

PDTA urges the NSW Government to use this Inquiry to strengthen the POCTAA framework by ensuring enforcement is balanced with meaningful investment in behavioural welfare outcomes, thereby reducing preventable loss of canine life and improving public confidence in approved charitable organisations.

PDTA stands ready to contribute professional expertise to policy development and implementation arising from this Inquiry.