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POLICY

**LICENSING AND
REGULATING CAT AND DOG
BREEDERS:
CONSULTATION PAPER**

AN ANIMAL LIBERATION SUBMISSION
DEPARTMENT OF PRIMARY INDUSTRIES

We acknowledge the
Traditional Owners of
country throughout
Australia and recognise
their continuing
connection to land, waters
and culture.

We acknowledge that this
document was written on
land stolen from and never
ceded by the Gadigal
People.

We pay our respects to
their Elders past, present
and emerging.





We don't have a duty to **speak** for the animals;
we have an obligation to be **heard** for the animals.

Matt Ball (2006)

DOCUMENT DETAILS

Animal Liberation. 2022. A submission by Animal Liberation in response to the NSW Department of Primary Industries (NSW DPI) Licensing and regulating cat and dog breeders – consultation paper. Prepared by Lisa Ryan and Alex Vince.

ABOUT ANIMAL LIBERATION

Animal Liberation has worked to permanently improve the lives of all animals for over four decades. We are proud to be Australia's longest serving animal rights organisation. During this time, we have accumulated considerable experience and knowledge relating to issues of animal welfare and animal protection in this country. We have witnessed the growing popular sentiment towards the welfare of animals, combined with a diminishing level of public confidence in current attempts, legislative or otherwise, to protect animals from egregious, undue, or unnecessary harm. Our mission is to permanently improve the lives of all animals through education, action, and outreach.

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NSW Department of Primary Industries

Via email: animalwelfare.submissions@dpi.nsw.gov.au

We present this submission on behalf of Animal Liberation.

Animal Liberation is pleased to lodge a submission in response to the NSW DPI, Licensing and regulating cat and dog breeders - Consultation Paper.

We request that it be noted from the outset that the following submission is not intended to provide an exhaustive commentary or assessment in response to the NSW DPI Licensing and regulating cat and dog breeders - Consultation Paper. Rather, our submission is intended to provide a general examination and responses to select areas of key concern.

As such, the absence of discussion, consideration or analyses of any particular aspect or component must not be read as or considered to be indicative of consent or acceptance. For the purposes of this submission, Animal Liberation's focus covers aspects that we believe warrant critical attention and response.

Animal Liberation's submission provides informed responses to the Consultation Paper's four (4) Discussion Questions together with general commentary and evidenced case examples to outline flaws and omissions in the approach being proposed by NSW DPI for the regulation of companion animals breeding in NSW through its proposed breeder licensing scheme.

Lisa J Ryan
Regional campaign manager



Alex Vince
Campaign director



SUBMISSION

1 DISCLOSURE & CONSENT

- 1.1 Animal Liberation confirms its understanding that NSW DPI is collecting submissions to inform policy development relating to companion animals breeding in NSW, and that information contained within our submission may be accessed by various officials within DRNSW for this purpose, and may be used to support further consultation. Animal Liberation confirms its consent to the NSW DPI to publish Animal Liberation's submission content individually or as part of a summary report on the Committee's website.

2 PREAMBLE

- 2.1 The NSW DPI Consultation Paper: Licensing and regulation of cat and dog breeders, proposes to introduce a cat and dog breeder licensing scheme.
- 2.1.1 Public feedback is being sought about which cat and dog breeders should be required to obtain a licence, and whether some cat and dog breeders should be exempt from the requirements of the Breeding Code.
- 2.1.2 The NSW DPI stated key principles of the proposed licensing scheme includes that it should be easy to understand, that costs should be proportionate, and that it should minimise unintended consequences.
- 2.1.3 Feedback received on the Consultation Paper will then be used to inform the development of a dog breeder licensing scheme.

3 INTRODUCTION

- 3.1 Animal Liberation supports the concept of a breeder licensing scheme to ensure critical data is captured including who is breeding companion animals, and the location of breeding facilities. We do not however support a scheme which is selective, ad-hoc and places the needs of breeders ahead of companion animals and their welfare and wellbeing.

3.1.1 Like many we are very concerned about the commercial exploitation of companion animals and the failure of successive governments to address these issues and strongly held public views. We strongly disagree that the NSW State Government has undertaken significant work to improve welfare outcomes in companion animals breeding, or has adequately demonstrated its commitment towards maintaining high standards of animal welfare and promoting responsible pet ownership in NSW.

3.2 We are familiar with and acknowledge the intent of the Prevention of Cruelty to Animals Act 1979 ('POCTAA') and the NSW Animal Welfare Code of Practice: Breeding Dogs and Cats, however, it is increasingly obvious that this weak and inadequate legislation is continuing to fail to address the key issues, including inadequate monitoring and enforcement of the legislation.

3.2.1 The lack of consistency in how meaningful animal welfare legislation is applied in NSW, and who it applies to is also of concern as well as confusing and inconsistent language. We are concerned that government continues to be selective, in the application of the legislation, and accordingly, certain breeds of companion animals will not enjoy the full legal protections they should be entitled to in line with clear public expectations.

3.3 As has been frequently the case with numerous government reviews and inquiries, the NSW DPI breeder licence proposal has been developed on a foundation which hasn't prioritised the animals' and their welfare, rather, it has been formulated on several assumptions and human ease of use, through the application of selective exemptions and loopholes.

3.3.1 Further, as was the case with the August 2021 updates to the NSW Animal Welfare Code of Practice: Breeding Dogs and Cats ('COP'), the proposed breeder licence scheme includes proposed pre-determined results and outcomes prior to receiving and reviewing public feedback, relying instead on stakeholder groups, many of which have vested interests which do not represent broad public expectations and views.

3.4 Meaningful animal welfare for companion animals used for breeding must include a consistent and objective approach. The current NSW driver's license scheme does not exempt motor vehicle drivers from mandatory compliance with ability, skills or experience based on how many cars they drive or own, and nor should a breeders licence scheme apply such a selective and illogical approach. Animal Liberation contends the welfare of these animals should not be dependent on who bred them and we reject any scheme which exempts some breeders, and doesn't include all cats and dogs, regardless of being purebred or cross bred,

3.4 together with greyhounds, working dogs, guide dogs, hunting dogs and therapy dogs.

3.5 Animal Liberation reiterates its serious and ongoing concerns about the NSW State Government's hap-hazard, ad-hoc, piece-meal and disjointed approach to animal welfare reform in NSW. This is notably so in relation to commercial companion animal breeding, housing and selling.

3.5.1 Animal Liberation contends there is ample evidence to conclusively confirm NSW has indeed glaringly fallen behind other jurisdictions, failing companion animals exploited for commercial profit, and public expectations and demands.

3.5.2 Animal Liberation further contends community concerns about unregulated breeding of cats and dogs has not merely arisen in 2020, rather it has been a prevalent and consistent public concern for many years which has only received government attention following the public exposure of abhorrent cruelty and suffering of companion animals in breeding establishments.

3.5.3 Finally, Animal Liberation contends that each animal is a unique individual sentient being with specific physical and emotional needs. The capacity to fail to deliver the welfare and wellbeing of cats and dogs is not necessarily determined by the number of breeding cats and dogs, or the commercial return, or any noted distinction between breeders.

3.6 Under the Terms of Reference ('TOR') for the 2015 Joint Select Committee on Companion Animal Breeding Practices in NSW, TOR (c) included 'Calls to implement a breeders' licensing system'.

3.6.1 **The Committee's report, Recommendation No. 10:**

"The Committee recommends that the NSW Government introduces a breeders' licensing scheme with the following elements: a) A comprehensive database of breeders b) A system of periodic audits and spot inspections c) Sets the number of animals that each breeding establishment may keep d) A breeders' licensing identification must be included in any advertisement in any medium where animals are advertised for sale e) Licenses every breeder and provides an auditable licence trail for every sale f) Records a breeder's licence number when an animal is microchipped".

3.6.2 **Government response:**

"Supported in part. A stand-alone breeders' licensing scheme is not supported. The redesign of the register and registration system in consultation with key stakeholders

will ensure that breeder details are captured and linked to animals they breed at point of microchipping, while minimising regulatory burden on breeders and improving the ability to better target problem breeders”.

3.6.3 The Committee’s report Recommendation No 11:

“The Committee recommends that the breeders’ licensing scheme should meet the following objectives:

- a) Breeder performance meets both Breeding Code baselines and continuous improvement goals;*
- b) Breeder-sourced dogs appear in pounds in declining rates ;*
- c) Compliance levels meet improvement goals;*
- d) Non-compliant breeders are identified and made compliant or closed down;*
- e) Microchipping rates increase;*
- f) Lifetime registration is meeting objectives”.*

3.6.4 Government response:

“Supported in part. The redesign of the register and registration system in consultation with key stakeholders and via the Reference Group will ensure that breeder details are captured and linked to animals they breed at point of micro-chipping. Further consideration will be given to mechanisms to provide additional resources to puppy factory enforcement by the Minister for Primary Industries”.

3.7 In spite of years of political rhetoric, government undertakings, public commitments and past Inquiries, the NSW State Government has failed to adequately listen to or meet community expectations in response to concerns about the breeding, housing and selling of companion animals and the oversight and enforcement of breeders and puppy factories. The Consultation Paper contains the following claims:

3.7.1 That some stakeholders have suggested that “NSW is at risk of being left behind as other jurisdictions reform their regulatory approaches to managing dog breeding”. Animal Liberation contends there is ample evidence to conclusively confirm NSW has indeed fallen behind other jurisdictions, failing both the companion animals exploited for commercial profit, and the public’s clear expectations.

3.7.2 That “in 2020, there were some community concerns that increased puppy factory activity was being driven by high demand for pets during the COVID-19 pandemic” and, “In response, the NSW Government established the Puppy Factory Taskforce - a dedicated compliance unit within RSPCA NSW - and increased penalties for animal cruelty offences through the Prevention of Cruelty to Animals Amendment Act 2021 (POCTA Amendment Act). These changes introduced new enforcement tools and increased penalties to enable effective compliance action to be taken against those companion animals breeders who were failing to care for their animals”.

3.8 Animal Liberation strongly disputes the claim that the RSPCA NSW Puppy Factory Taskforce was established following “some” community concerns arose due to related increased puppy factory activity being driven by high demands for pets during the Covid-10 pandemic. Strong public concerns about NSW puppy factories have been prevalent for many years, and have been largely ignored by government, apart from some political rhetoric and peripheral window dressing.

3.8.1 The increased purchase of companion animals during the pandemic also included cats and dogs from pounds, shelters and rescue organisations. We have not cited any evidence and nor has NSW DPI provided any evidence to confirm increased puppy farm activity during the now almost three years of the pandemic, although this would not surprise us, given the financial driven motivations of these operators.

3.8.2 It is our informed view that the RSPCA NSW Puppy Factory Taskforce was established more out of acute embarrassment by then responsible Minister Adam Marshall, particularly following the subsequent public exposure of the Gwydir shire puppy factory in late 2020 operating in his own electorate. This same facility had been exposed in 2015 at which time Mr Marshall and then Minister Niall Blair and the NSW LNP coalition vowed to shut it down and overhaul legal welfare protections for animals caught up in commercial breeding. In reality, the government and ongoing Ministers failed to deliver and the animals at Gwydir and elsewhere across NSW have continued to suffer abhorrent cruelty, and many have died or have been killed.

3.8.3 Nor do we consider the increased penalties for animal cruelty offences through the Prevention of Cruelty to Animals Amendment Act 2021 ('POCTA Amendment Act') or the recently introduced enforcement tools to be sufficiently robust, effective or meaningful to ensure compliance action can or will be taken against those companion animal breeders who are failing to care for their animals. Many of these facilities are hidden and combined with an already weak and inadequate animal welfare protection framework, these animals continue to suffer, unless they are exposed by animal activists.

CASE EXAMPLES

- 3.9 The following three (3) examples clearly demonstrate why exemptions for certain breeders of companion animals will fail to meet the welfare needs of all animals. These examples depict potentially many hundreds of other known and unknown examples where companion animals used for breeding continue to suffer abuse and neglect and cruelty. Animal Liberation contends the examples put forward are not isolated incidents.

CASE No. 1 : DOGS NSW AND DOGS ACT MEMBER

- 3.10 In April 2016, in the Hilltops region, a cruelty complaint (Complaint Re No. 222613) was made to RSPCA NSW by a representative of Animal Liberation following the discovery of dead purebred dogs, some of which had been shot and then buried in shallow graves. The dogs had also been confined and housed in putrid kennels. The dogs had been owned by a former Dogs NSW and then current Dogs ACT member who owned the following purebred dogs: Amstuffs, Lakeland Terriers, Chinese Crested and Pharaoh Hound. The breeder was also a member of a number of purebred dog clubs including, the Chinese Crested Club of NSW, Pharaoh Hound Club of NSW, Amstaff Club of NSW, Cootamundra Kennel Club, Temora Kennel Club, Southwest Kennel Club, Combined Toy and Terrier club.

- 3.10.1 The matter received extensive media cover under the heading: Show dogs kept in 'putrid' kennels then SHOT and buried in shallow grave by female dog breeder who 'was moving and couldn't transport all her animals'.

- 3.10.2 The RSPCA NSW complaint (cited above) was also lodged with Dogs NSW and Dogs ACT for their numerous failures and included, in part and appropriately redacted:

"I confirm that I attended the property (detailed in my verbal telephone complaint), at approximately 3 pm, Sunday 3 April 2016 with the consent of the property owner.

I confirm I personally witnessed the pit/grave area and a number of deceased dogs which had been unearthed by accident when a backhoe was in use.

I confirm that the attached photographs of the deceased dogs of various breeds were taken by me.

I believe that the dogs I witnessed included what appeared to be an Amstaff and the others either Chinese Crested or

Lakeland Terrier breeds. One small dog, possibly a Chinese Crested appeared to have a bullet hole in the side of its head. If this is confirmed then it is essential that the police investigate that the required firearms licences were in place.

The pit/grave is large (wide) and some dogs have been buried in a shallow manner. As the backhoe was moving dirt, more dogs were being unearthed.

There appeared to be a 'lime' covering on some of the dogs which was mixed in with the dirt. The state of decomposing was not significant and I would estimate the dogs had only been buried for approximately one week, possibly less.

I confirm that the person of interest ([REDACTED]) is, as far as I know, a Dogs ACT member who had previously been a Dogs NSW member and who had been refused Dogs NSW membership renewal. I believe [REDACTED] provided a false address to Dogs ACT (obviously not confirmed by Dogs ACT) and obtained Dogs ACT membership.

I have previously advised Dogs ACT by telephone of this at the time and they said they needed proof that [REDACTED] was living in NSW not ACT. I told them to get in their car, take a drive and do their job. I further advised Dogs ACT that [REDACTED] was breeding multiple litters and that the alarm should be going off with any member who has numerous breeds of dogs as this can indicate a commercial rather than 'hobby' motivation.

I further advised Dogs ACT of the numerous Dogs NSW complaints, over numerous years, which have been lodged (including by me), in respect to [REDACTED], of which they were aware and that in no instance have any of the ANKC bodies acted.

I confirm that I requested the backhoe operator to continue moving dirt so I could obtain photographs. On two occasions the operator who was very distressed was physically ill, because of the stench.

I confirm that I personally inspected the dog kennels on the property and that the attached photos of the dog kennels were taken by me. The kennels in every instance were heavily littered with massive amounts of dog faeces. This included the walkway either side of the two sides of kennels. Some kennels had water bowls and many did not.

It is my understanding that a recent partner of [REDACTED] ([REDACTED]) who also showed dogs (Amstaffs) and I believe was/is a Dogs NSW member 'abandoned' his dogs with [REDACTED] after the relationship ended. It is my understanding that [REDACTED] has been trying to sell many of these dogs - this however is not unusual because she is continually breeding and selling dogs".

3.11 On numerous occasions, ██████████ made threatening and intimidating comments to an Animal Liberation representative, either directly or indirectly, as the following confirms:

3.11.1 *“Can everyone run this stupid activist woman lisa ryan out of our town, we need pepes ducks and the employment it will bring, what we dont need are activist numbskulls, she is constantly trying to stop this works on pepes ducks, something we here all need. Harrassing young council and its pound as well as harden council and its pound, trying to stop the trapping of the wild feral cats as well, people like her have truly no idea”*

3.11.2 *“WTF theses people should just just go neck themselves, they dont need to be there its only dirt and no animals are being treated cruelly , She is a DF”.*

3.12 In the Animal Liberation representative's formal complaint it was requested that *“RSPCA NSW, Dogs NSW and Dogs ACT immediately investigate these matters, take the appropriate actions and that I receive replies in all instances”.*

3.12.1 In summary, there was no adequate investigation or justice obtained for the dogs concerned by the relevant agencies or organisations. The full extent of the animal suffering and/or the extent of dog shooting is unknown.

FIGs. 1-4: CASE No. 1



CASE No. 2: BACKYARD BREEDER

3.13 In October 2016, a formal cruelty complaint was advised to a member of Animal Liberation involving a number of adult dogs and very young puppies which were housed in the Hilltops region. It was believed the adult dogs were used for, and were being bred for pig dogging by a backyard breeder. The dogs were confined to an entirely inappropriate and non-suitable backyard with no obviously or apparently accessible kennels, bedding and no apparent water. The dogs were severely emaciated and several had obvious open and infected wounds (believed to be untreated) to their bodies. The details were reported to RSPCA NSW and the NSW Police and Harden Council by the Animal Liberation representative.

3.13.1 Due to no immediate RSPCA NSW support, the local NSW Police were called and a compassionate and sympathetic police officer attended the property and the dogs and puppies were seized. As a result of the welfare conditions of some of the dogs, several required euthanasia.

3.13.2 To the best of Animal Liberation's knowledge, no corresponding investigation was initiated by RSPCA NSW, the Police or local Council (then Harden Council) and accordingly, no justice was achieved for these dogs and puppies and no preventative actions were implemented.

FIGs. 5-7: CASE No. 2



**CASE No. 3: LOCAL GOVERNMENT COUNCIL DA APPROVED
COMMERCIAL DOG/PUPPY BREEDER**

- 3.14 The best current example to illustrate the failure of the legislation and applicable permits for dog breeding is the Gwydir shire puppy factory, also known as the Inverell puppy factory.
- 3.14.1 This notorious large scale puppy factory facility (Stockhaven dog breeding facility) which had been operating without any consent or permits first came to public attention in 2015 following exposure by animal activists.
- 3.14.2 Then, under the former Minister Niall Blair, the Gwydir shire puppy factory situated in the most recent Minister Adam Marshall's own Northern Tablelands electorate, was investigated by RSPCA NSW, after the appalling conditions were publicly exposed in the media and the subsequent ensuing expected public outcry. At that time, Adam Marshall and the NSW coalition government vowed to shut this puppy factory down. Of course, we now know it wasn't shut down and those dogs and puppies and new dogs and puppies continued to suffer.
- 3.14.3 Following DA approval, on appeal by the Applicant through the Land and Environment Court, the facility was able to continue its commercial exploitation of dogs, puppies and consumers. It continued to operate un-hampered for a further five (5) years, until it again became the subject of media attention in late 2020 when it was attended by RSPCA NSW following distressing whistle-blower allegations. Though around 60 dogs and/or puppies were removed by RSPCA NSW on animal welfare grounds, many others remained.
- 3.14.4 We still don't know how this festering cruelty was allowed to continue and why this puppy factory was not shut down as promised, apart from the stark knowledge that the factory farming of dogs is legal. It is a glaring indictment on the NSW State Government, all relevant agencies and inadequate NSW animal welfare protection legislation, that this abhorrent facility is still operating today, receiving and enjoying tax free commercial benefit at the expense of hundreds of dogs, puppies and misled consumers.



4 RESPONSES & COMMENTARY

DISCUSSION QUESTION 1

Do you have any comments on the principles for designing a licensing scheme?

4.1 Animal Liberation contends that any effective and meaningful breeders licensing scheme should prioritise the welfare of the animals being bred, and should not allow any type of exemptions. We support a scheme as recommended by the NSW 2015 Joint Select Committee on Companion Animal Breeding Practices in NSW in its Report, and specifically, that such a scheme should:



License every breeder and provide an auditable licence trail for every sale



Include a system of periodic audits and spot inspections



Ensure non-compliant breeders are identified and made compliant or closed down

4.1.1 It is Animal Liberation's informed view that the breeders licence 'ease of understanding' should be prioritised from the consumer's perspective, and that this can be largely achieved with no applicable exemptions for breeders, whilst including a table of the various types of breeders.

DISCUSSION QUESTION 2

At what threshold (e.g. fewer than a certain number of breeding animals), should a cat or dog breeder be considered an Exempt Breeder, meaning they are not required to hold a licence or comply with the Breeding Code?

4.2 Animal Liberation does not support any scheme which exempts any breeders or does not require the adherence to the Breeding CoP, based on the number of animals used for breeding or the financial return received by a breeder.

DISCUSSION QUESTION 3

At what threshold (e.g. more than a certain number of breeding animals) should a dog breeder be considered a Large Breeder, meaning they must hold a licence and comply with the Breeding Code?

- 4.3 It is Animal Liberation's informed view that any breeder, regardless of affiliations or the number of animals kept and used for breeding, should be required to hold an approved and current licence, and comply fully with the respective CoP.

DISCUSSION QUESTION 3

Do you think that working dog breeders should also be considered Exempt Breeders, meaning they are not required to hold a licence or comply with the Breeding Code?

- 4.4 Animal Liberation is strongly opposed to any exemptions to working dog breeders. All working dogs used for breeding, and their progeny, are individual sentient beings with unique personalities and welfare needs which should never be compromised by exemptions to breeders, including breeders of working dogs.

OTHER COMMENTS

- 4.5 In addition to appalling NSW rates of animal welfare monitoring and enforcement as they apply to the breeding of companion animals, it is Animal Liberation's experienced and informed view that many of the issues associated with the breeding of cats and dogs and the corresponding welfare and non-compliance issues, stem from NSW's inadequate planning legislation, as they apply to nonhuman animals.

- 4.5.1 The *Environmental Planning and Assessment Act 1979* ('EP&A Act') and the associated Regulations and the corresponding planning framework including State Environmental Planning Policies ('SEPPs') fail to even acknowledge companion animals. In spite of the commercial and intensive aspect to the breeding of companion animals in puppy factories, and the proliferation of same across NSW, and while the intensive breeding of other animal species such as pigs or chickens are accommodated to some extent, inadequate as it is, in the Secretary's Environmental Assessment Requirements ('SEARs'), companion animals trapped in puppy factories are excluded.

- 4.6 The extent of the commercial breeding of cats and dogs across NSW is largely unknown in spite of such practices being regarded as a major animal welfare issue across Australia and increasingly so in NSW.
- 4.7 Currently the law defines the acceptable treatment of animals according to their use rather than their capacity to suffer. As a compassionate and aware society, we must consider that as history has demonstrated over and over again, just because something is legal, doesn't make it moral, ethical or right. Humanity dictates we all have a moral obligation to challenge injustice and societal wrongs and shape who we are as a society. Our leaders and decision makers have a clear responsibility to listen, question and act in this regard.
- 4.7.1 Animal welfare as expected, indeed demanded by the community and public, includes animals being entitled to rights, welfare and protection under the internationally recognised '5 Freedoms'. This includes both physical and mental state, and good animal welfare implies both fitness and a sense of well-being.



5 SUMMARY & CONCLUSION

5.1 In summary, after thorough objective assessment and consideration of all the factors associated with the breeding of cats and dogs, Animal Liberation has concluded that a robust Breeders Licence Scheme is both warranted and urgently needed, if government is to honour its publicly stated commitment towards the genuine and meaningful delivery of animal welfare reform.

5.1.1 Animal Liberation strongly contends that progressive and meaningful animal welfare can only be achieved when all animals' are protected by equal and consistent mandatory protections under any proposed Breeders Licence Scheme.

5.2 A Breeders Licence Scheme is in itself only a meagre component under the animal protection legislative framework, and yet, even in this example, government has demonstrated its willful intention to compromise the welfare of some cats and dogs through a pre-determined regime of exemptions, based selectively on who the breeder is, the number of animals, and the breeder's affiliations with self-regulated organisations.

5.2.1 Further, the proposed Breeders Licence Scheme's priorities, as outlined, focus on financial and convenience considerations and needs of select breeders, rather than progressing the welfare of the animals being used for breeding, or the protection of consumers.

5.3 Animal Liberation supports the introduction of a NSW Breeders Licence Scheme on the following basis:



That the scheme applies to all breeders' regardless of the breeder's status, or the number of breeding animals or their progeny.



That all licences should be subject to annual renewal including a robust annual review, and that any breeder identified for non-compliance incidents, should result in immediate and automatic licence disqualification.



That prior to any licence approval of annual renewal, the annual review should include inspection of all animals, the breeding facility and all associated breeding records. That an appropriate annual fee should be applied for each licence to cover agency monitoring and enforcement.



That any breeder or their associates previously convicted of animal cruelty, regardless of which state or territory, should automatically be refused a breeders licence.



That any breeders licence should provide clear consumer advice through a table to clarify the type of breeder, affiliations, dog or cat breeds and the number of animals owned by the breeder, and links to any website or social media site which the breeder uses to advertise and sell animals. Such a table of breeders could include the following as examples:

LICENCE A	Dogs NSW member number and breeder prefix
LICENCE B	Australian Association of Pet Dog Breeders (AAPDB) or Animal Care Australia (ACA)
LICENCE C	NSW Local Government Council DA approved facility



That all animals sold or given away online, privately or through markets or pet shops must prominently display the respective breeder licence for each animal.



That any breeder residing in a state or territory other than NSW, who is selling or potentially selling animals to NSW residents, must also adhere to the NSW breeder licence scheme requirements, as a non NSW resident.

5.4

In conclusion, any breeders licence scheme which exempts selective breeders and prioritises licence affordability and ease of use, is discriminatory and will continue to fail to protect the animals' being used for breeding, and consumers.



SOURCES AND REFERENCE MATERIAL

GOVERNMENT DOCUMENTS

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LEGISLATION & REGULATIONS

Animal Welfare Code of Practice No 1 - Companion Animal Transport Agencies

Companion Animals Act 1998

Companion Animals Regulation 2018

Environmental Planning and Assessment Act 1979

Environmental Planning and Assessment Act Regulation 2000

NSW Animal Welfare Code of Practice - Breeding Dogs and Cats

NSW State Environmental Planning Policies

Prevention of Cruelty to Animals Regulations 2012

Prevention of Cruelty to Animals Act 1979

OTHER

Loomes, P. 2020. Two NSW puppy farms raided over alleged 'extreme animal cruelty'. News.com.au. 16 September.



Photo: Shutterstock

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