



**Ban Unethical breeding -
not puppy breeding**

“Protect responsible breeders”

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**IT IS NOT ABOUT NUMBERS —
IT IS ABOUT EDUCATION, EARLY
INTERVENTION AND COMPLIANCE!**



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‘Ban Puppy Farming’ Legislation IS NOT the solution!

Animal Care Australia (ACA) does not support irresponsible breeding or individuals who commit acts of cruelty against animals.

Improved animal welfare cannot be achieved by restricting the numbers of animals that can be bred, in fact restrictions can prove to be detrimental to many individual breeds of animals and have a plethora of un-intended consequences.



This document concentrates on dogs and cats — the victims of most proposed amendments to companion animal related Acts.

Animal Care Australia cannot support amendments which see caps/restrictions placed on the number of females breeding or additional limits to the number of litters each female can have beyond those based on scientific evidence.

Throughout this document Animal Care Australia shows animal welfare is best improved by ensuring compliance with current legislation and educating the public on their responsibilities. This is the sensible way of improving welfare outcomes and not arbitrary caps on numbers.

Despite this, governments are bowing to the pressure of animal rights organisations and political parties.

What does Animal Care Australia recommend?

Number restrictions and purposely refraining from providing definitions is a ‘sleight-of-hand’ to implement animal rights extremist policies with the long-term goal of reducing the numbers of animals in human care (ownership).

Animal Care Australia:

- opposes attempts to reduce, restrict or impose caps on the numbers of animals being kept in our care.

- implores government to provide more adequate funding for educating the public on their responsibilities as pet owners including supporting & promoting animal keeper associations & clubs.
- encourages government & local council to implement responsible breeder programs.
- implores government to provide additional funding to adequately monitor and respond to circumstances where animal welfare standards are not being sustained while utilising the existing legislation.
- encourages government to provide initiatives to the public that ensure people of lower income communities can maintain their animals' welfare needs — such as concessions for veterinary treatment, de-sexing costs, food and housing.
- implores all political parties to be wary of policies that encourage the creation of a 'shelter industry'.

Animal Care Australia sees no reason to impose more restrictions than those currently legislated.

What is a 'puppy factory'?

For the purpose of this document a 'puppy farm/factory/mill' also includes kitten mills.

It is generally agreed that no-one likes 'puppy farms' but what is a puppy farm?

The dictionary defines it as:

'an establishment that breeds puppies for sale, typically on an intensive basis and in conditions regarded as inhumane.'

Wikipedia says:

'A puppy mill, also known as a puppy farm, is a commercial dog breeding facility characterized by quick breeding and poor conditions.'

RSPCA Aust:

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

“... the amendment won't create a definition specifically on 'puppy farming' but instead will follow the VIC and WA model of developing provisions around breeding by putting caps on the number of female breeders and number of litters each female can have. “

Emma Hurst — email response to Animal Care Australia, 20/9/2020.



Animal Justice Party:

- refuse to provide a definition.

There is a common and agreeable factor within all the definitions and that is 'inadequate or poor welfare conditions'.

It has been shown that even large facilities can breed dogs and cats with high welfare standards, and meet the animals' behavioural, social and/or physiological needs - so why would you restrict these facilities with caps on numbers?

Animal Care Australia's definition:

'Puppy factory' or 'Unethical operator/breeder' is any person/entity who is breeding an animal with poor welfare outcomes in defiance of the animal welfare standards.'

What are the solutions?

There is no easy one step to fix all solution. The fact of this matter is the more legislation and regulations you implement, the greater the incentive to hide and this creates a higher level of non-compliance, becoming more difficult to police and ultimately the victims you're trying to save in reality



are more greatly impacted with the welfare standards diminishing in a bid to avoid detection.

Animal Care Australia strongly advocates more focus should be aimed at changing the main perspective to educating responsible breeding.

- **Animal Care Australia implores government to provide more adequate funding for educating the public on their responsibilities as pet owners including supporting & promoting animal keeper associations & clubs.**

Educating the public is a key step in changing behaviour. Education needs to be themed with the aim of making pet owners more aware of their responsibilities. In general, most people are unaware that there are Codes of Practice that must be followed. They know that animal cruelty laws exist, but do they know what is written in those laws?



Education needs to start in our schools (primary and high school). Our children are usually the ones seeking to own a pet and they are also the keepers and breeders for the decades that follow. Introducing basic pet care and the responsibility of pet ownership skills to children will

enhance the understanding of pet ownership within the community and more specifically will help overcome many barriers within multi-cultural communities, where pet welfare and ownership has been inherited from different societies with a vastly different understanding of how animals should be kept.

Teaching children throughout their primary and higher education levels about responsible buying and the need to ensure you buy from a reputable breeder is crucial in this era of technology where not-so-credible sellers are attracting the new generations that live in the technological space. Once upon a time if you wanted a puppy, you read an advertisement, you phoned, you visited the home of the breeder, you picked your puppy, you left a deposit, and you came back when it

was old enough to take it to its forever home with you. Today, pictures of puppies are posted, money is transferred and quite often animals are exchanged without having seen where they were born, the parents or the standards they'd been living in. In an increasing trend no animals are exchanged at all — and the buyer is scammed .

Local Councils have been allowed to implement their own additional rules for keeping and breeding animals — unvetted and often without any legitimate stakeholder or public consultation — and most residents are completely unaware these policies exist.



The RSPCA and to a far less extent the Animal Welfare League are seen as the 'police' - their only goal to catch you out, seize your animals, put you before the courts and make a profit from you (from fines & on-selling of seized animals).

The 'P' in RSPCA stands for 'prevention' and yet this is the furthest aspect the public believe the RSPCA carries out. Those in need or in search of assistance and knowledge are too afraid to ask for it.

Animal keeping associations (clubs) strongly encourage better welfare standards. Members of animal clubs engage in positive peer pressure to maintain high standards and improve welfare. The sharing of husbandry techniques and awareness of ethical and responsible breeding becomes the norm. The government needs to educate and promote animal welfare in a similar manner. It needs to support the clubs and it needs to see the pet keeping public as one 'large' club where people are incentivised to do the right thing — rather than only concentrating on those doing the wrong thing.

- **Animal Care Australia encourages government & local council to implement responsible breeder programs.**

Responsible breeders are what we aim to increase in our fight against ‘puppy factories’. People need to be made aware of what a responsible breeder is and how that provides healthier and more stable puppies and kittens.



- **Animal Care Australia implores government to provide additional funding to the compliance organisations to adequately monitor and respond to circumstances where animal welfare standards are not being sustained while utilising the existing legislation.**

Currently, the RSPCA, Police and in NSW, the Animal Welfare League have the responsibility to monitor and respond when complaints are received. This system has failed the animals and their owners for far too long, and it is time that the governments across Australia to take on the responsibility of education, prevention and enforcement of our animal welfare laws.

Additional funding is necessary to fund more staffing for ‘prevention units’ and ‘prevention education’ and ‘government employed animal welfare officers’ which in the longer term will reduce the number of actual compliance issues received and the need to prosecute.

- **Animal Care Australia encourages government to provide initiatives to the public that ensure people of lower income communities can maintain their animals' welfare needs — such as concessions for veterinary treatment, de-sexing costs, food and housing.**

Initiatives and incentives are vital in changing societal behaviour. 'Reward the good — punish the bad'. Too much focus is on punishing the bad and very little reward is available for those people doing the right thing.

Local Councils should be providing concessions for veterinary treatment, de-sexing costs, food and housing.

People who register their pets should not be charged a fee for the 'privilege' instead when a pet is registered the owner should be rewarded, with a voucher discounting the cost of their next vaccination or on microchipping the pet.

This would reduce the amount of self-microchipping being carried out in order to avoid the current issues with the Pet Registry.

- **Review and update companion animal pet registries to ensure system is working efficiently**

Across the country Pet Registries are failing. Some current issues include:

- Accounts & BIN's can be established without any verification or checks with registered Associations.
- Local Councils are responsible for much of the information not being updated and is therefore inaccurate.
- Animals are not listed under the correct owners' details due to flaws in how the Registry functions. Animals remain listed with breeders despite animals having been transferred much earlier to new owners
- There are major privacy concerns with Registries used by Councils to ascertain the number of animals at each property, prompting unnecessary and often intimidating Council Officer visits – to the detriment of the breeder's privacy – particularly given the high level of flaws and inaccurate information being stored within that Registry.

- Animal Care Australia recommends Government removes the ownership and responsibility of maintaining and updating the Registry from Local Councils and develops an automated self-entry system in all States. Ideally all State Pet Registries should be amalgamated into a National Pet Registry that is not overseen, managed or influenced by Local Councils. Councils are simply not reliable and in many cases are the reason why the Registry is failing and unviable. For the period of time that this is not possible then Government should implement policies that:
 - require Councils to update records within a set period of time.
 - hold Councils responsible if they fail to maintain the records within that time frame.

Ideally Animal Care Australia would like to see all State Pet Registries amalgamated into a National Pet Registry that is not overseen, managed or influenced by Local Councils.



The Animal Rights Agenda!

The continued push to introduce caps on the numbers of females able to breed and the number of litters each female can have feed directly into the Key Objectives of the animal rights agenda.

Organisations such as Animals Australia, PETA Australia, Oscars Law, and the Animal Justice Party all rely heavily on claiming to improve animal welfare as a means to justifying and implementing their policies.



The AJP will promote reform to protect the best interests of companion animals consistently across Australia. Addressing the and associated oversupply of companion animals is central to solving the many problems they experience. This will create a more animal-friendly society. Like most Australians, we believe that every companion animal deserves a loving home. The AJP supports people living with companion animals.

Key Objectives

- 1 Introduce subsidised veterinary care, such as Veticare in Victoria, with priority given to low income earners, pensioners, animal rescuers and carers (see our Veterinary Care policy)
- 2 Promote animal adoption ('Adopt Don't Shop'), ban the sale of animals from breeders in pet shops and strongly regulate online sale of animals.
- 3 Ensure proper Government funding for pounds, shelters, rescues and carers to cater to all lost and homeless animals and prevent euthanasia except when medically necessary.
- 4 Provide education on the care of companion animals to promote their wellbeing and prevent cruelty and neglect, strengthen animal cruelty laws to reflect this duty of care and increase resources to investigate and prosecute animal cruelty (see our [Animal Law Policy](#)).
- 5 Ensure that all companion animals are housed in appropriate environments without undue confinement and are given appropriate care, enrichment, exercise and stimulation according to their individual and species-specific needs. In the case of cats, we support runs that allow outdoor experiences.
- 6 Increase desexing levels through targeted government funding for desexing and community education programs.
- 7 Outlaw puppy and kitten farming and work towards a [nationally consistent Breeder Permit](#) scheme including biometric identification to stop irresponsible breeders and reduce the number of animals without loving homes.
- 8 Phase out the breeding of animals with harmful genetic problems and heritable defects.
- 9 Repeal breed-specific legislation throughout Australia.
- 10 Stop discrimination against tenants with companion animals and increase the availability of animal-friendly accommodation, including retirement homes.
- 11 Ensure our cities are friendly to companion animals with suitable toilet and water options, recreational spaces and better animal-friendly public transport.
- 12 Include companion animals in probate and guardianship laws so that they can be adequately cared for after the death or incapacitation of a human guardian.

(Screenshot from Animal Justice Party [website](#): 24th March 2025)

The AJP Companion Animals Policy is just one of many concerns with particular attention to Key Objective 8 - **'Phase out the breeding of inherent genetic problems'**. Most people may not be aware that a vast number of animals suffer with inherent genetic problems.

For example, in dogs, there are a number of significant animal welfare problems associated with breeding of certain dog breeds. These include exaggerated physical features, including inherited diseases. Issues can include overly flat faces, abnormally large eyes, excessively wrinkled skin or disproportionately short legs. For some breeds overtime, these physical features have become increasingly exaggerated.

While inherent genetic problems are found in most if not all species, this Policy is directly aimed at dog breeding. Ironically there is a paradox in its existence. To phase out the breeding of genetic issues, you must breed out the inherent gene by utilising breeds with stronger genetic lines. This would be impossible if the restriction of numbers of dogs that can be bred in order to maintain and strengthen genetic lines is capped.

In fact, restricting any companion animal species WILL result in BREED-SPECIFIC EXTINCTIONS. In dogs and cats, the list of near extinction breeds has continued to expand since the introduction of ‘puppy farm legislation’ in 2017.

Statements such as, ‘phase out the breeding of’ and ‘repeal breed specific legislation’ are NOT ANIMAL WELFARE statements they ARE ANIMAL ERADICATION statements.

Parliamentary Inquiries findings

Multiple Parliamentary Inquiries received a small number of submissions that supported a total ban on the breeding of companion animals for commercial purposes or limiting the number of animals allowed to be kept by breeders. While the respective Committees have acknowledged these submissions, the continued finding is that they were unable to articulate how limiting the number of animals might improve animal welfare outcomes. It has also not been possible to determine why an arbitrary number of animals, such as three or ten, was considered the appropriate maximum number of breeding animals allowed, irrespective of the type of breed or whether the animal was a dog or cat etc.

The Committees received no strong evidence that the scale of breeding operations correlated with the welfare of the breeding animals. Indeed, they have received submissions from local councils, animal shelter operators, veterinarians. the RSPCA and Animal Welfare League in NSW highlighting inadequate welfare conditions in many small-scale breeding operations consisting of only one or two breeding animals.

It is well worth taking the time to look into the findings and recommendations from the many Inquiries in NSW (since 2015) and the Inquiry into the then proposed puppy farm legislation in Victoria.

With the findings of the 2015 Select Committee concluding “the number of animals kept by a breeder is not in itself a factor which determines the welfare of breeding animals” and with many of the potential reasons NOT to place restrictions now being experienced in Victoria.



Current Legislation

All states have legislation and codes of practice that govern the standards for breeding dogs and cats. These apply regardless of whether they are a member of a recognised breeder’s group and regardless of what size or type of dog or cat they breed and or how many they own and breed. These laws are outlined in the:

Codes of Practice include Standards [which are compulsory] and Guidelines.

Compulsory Standards include:

The number of litters a bitch (queen) Bitches must not exceed within a specific time period and the overall within their lifetime. There are some exemptions with the written approval of a veterinary practitioner.

If a bitch (or queen) is only allowed to breed a limited number of litters within a set time frame (varies between 18 months and two years) and then each must be rested for the remainder of that period, then having multiple females ‘cycling’ over that period:

- maintains healthier females,

- continues the production of the gene pool,
- maintains respectable supply of puppies/kittens ensuring demand does not exceed supply,
- ensures quality over quantity due to less pressure brought about by a stronger demand,
- does not induce irresponsible breeding due to sudden increase in value of individual animals

The problem is not with a powerless legislative policy as suggested by animal rights extremists. The problem is with an uneducated public! Make the government fund more education!

Victorian Legislation is a disaster!

Do not believe the lies that Oscar's Law & the AJP are perpetrating. The introduced legislation in Victoria has seen a drastic increase in:

- X** unhealthy puppies & kittens at veterinary surgeries & shelters*
- X** complaints relating to scammers and non-supply of animals where deposits were paid
- X** unregistered breeders ('puppy farms' by the very definition)
- X** prices skyrocketing for all breeds of puppies and kittens (pre-covid19) with exorbitant prices during Covid19.

There has been a marked decrease in:

- **Registered breeders maintaining their breeds**
- **healthy puppies and kittens**
- **breeding females available to other breeders for genetic diversity**

With the restriction of only ten females per property many shelters & rescues have been unable to take on additional animals — resulting in animals needing to be euthanased to maintain numbers as per permits. Despite assurances that

services & organisations would be exempt - changes to local council codes have seen many 'boarding & rescue' facilities close or run on limited numbers.

*(Source: <https://www.smh.com.au/business/consumer-affairs/penned-in-victorians-pining-for-a-pet-drive-cruel-smuggling-trade-20200731-p55h6n.html>)

Victorian Government scrambled to fund shelters and continues to create a 'shelter industry'.

The high demand for puppies & kittens in Victoria resulted in an increase in the number of unethically bred animals which in turn saw an increase in animals being surrendered to shelters and vets, due to ill health and a lack of proper social interaction training.

In June 2021 the Victorian Government was then forced to announce grants to expand shelters and fund their ongoing existence. A Taskforce was established to investigate how kill rates should be reported due to concerns a larger than normal number of animals were needing to be euthanased.

A second Taskforce was implemented to investigate how to regulate shelters and rescues as well as to identify why so many animals were being abandoned to shelters!

Puppy Farms INCREASED and they did not disappear!

In March 2021, the RSPCA Vic publicly expressed its concerns over the resurgence of puppy farms.

(Source: <https://www.3aw.com.au/concerns-over-resurgence-in-illegal-puppy-trade-in-victoria/?>)

In May 2021 the Animal Law Institutes Anti-puppy Farm Legal Clinic declared it was over-whelmed with demand from people seeking assistance and compensation from dodgy underground breeders and puppy farmers across Victoria.

(Source: <https://www.abc.net.au/news/2021-05-10/victorian-animal-clinic-dog-legal-breeders-compensation/100126684?>)

To date, none of these issues have changed.

**When demand is increased values skyrocket!
Increased values equals more incentive to produce irresponsibly**



Health & Welfare Considerations.

Animal Care Australia strongly promotes responsible breeding with all of our members and we acknowledge there will always be some breeders who keep their animals in substandard conditions. While we are discouraged by this the fact remains in all activities or industries there will be some who break the rules and cause suffering. It needs to be highlighted that these are in the vast minority.

No amount of number restrictions will prevent a person who is determined to operate in this manner from doing so. In fact, the incentive for these operators is 'profit' and a reduced or restricted availability of animals only incentivise these operators to create more elaborate and 'underground' facilities.

It should also be noted that a person is just as capable of mistreating two dogs/cats as they are any number.

It is our contention that every animal should be treated well regardless of how many the breeder keeps.

Number limits do not consider the vast differences in breed requirements and management issues and for the community of having more, rather than less animals, to choose from in a breeding program.

Reputable dog breeders typically test their dogs in either all or some of the following:

- the show ring,
- obedience trials,
- agility,
- scenting,
- and breed appropriate tests and trials.



They perform health tests and screens to ensure their bloodline and resultant puppies are healthy. This results in

breeders often having intact males and females that are not being bred and may never be bred. Many fertile dogs they have in their care at any given time may be removed from the breeding program if they fail health or temperament criteria.

Many diseases cannot be tested for until the animal is older, for example joint X rays and heart screening. Some recommendations in some breeds are that an animal should not be bred until it is over 5 years of age to be able to eliminate the possibility of breeding a dog which will develop such diseases as Mitral Heart Disease.



Reputable cat breeders perform health tests on their breeding cats such as:

- DNA panels for breed specific illness and disease,
- heart scanning and hip scoring to ensure where possible the resultant kittens are as healthy as can be.

Many health and disease tests cannot be tested for until the animal is older such as heart scanning. Colours, both visual and recessive, are also tested for. These tests help formulate a successful breeding program and where cats are bred to improve the breed instead of just for kittens to sell. This also results in breeders often having intact males and females that are not being currently bred or may never be bred depending on how these

cats fit into the breeding program. Entire breeders can at any time be removed if they are found they do not meet the health and temperament criteria for the direction of the breeding program.

Limiting the numbers a breeder can keep effectively limits their choices for selecting only the healthiest and best animals to include in their breeding programs and impacts on health and quality of young bred and negatively impacts the gene pool of a breed. In order to breed for improvement, a breeder must have multiple females to breed and should be breeding with the intention of keeping some young for themselves, for future breeding. As a result, a breeder will have more females, in order to be breeding scientifically and with a number of breeders also working on different lines.

This is vital for the continued supply of dogs for assistance dogs, police, armed forces, search and rescue, scenting etc. or breeds that do not carry health issues. This means that some breeders need to own more animals than someone working on just one line, goal or breed.

Responsible breeders are breeding to better the breed and their lines, by keeping some young out of their breeding to select the best they can to constantly improve on the next generation.

Limitations in numbers will not reduce the numbers of animals entering and dying in shelters.

Animal Rights proponents claim number restrictions are necessary to stem the tide of animals entering and dying in shelters. However, we assert that there is not an oversupply of puppies/kittens. There is no question that too many animals die in shelters and pounds each year. However, there is no connection between the breeding of a healthy litter of animals with good temperaments and the death of a stray dog in a shelter.

Most responsible breeders sell their animals to new homes, take back animals that buyers cannot keep, and are available to answer questions and help new

owners to train and protect the health and well-being of their breeds. They are part of the solution to community issues and should not be treated as if they are the problem.

**People often ‘impulse buy’ because it is ‘adorable or cute’ - without understanding how big it will get or it’s needs.
RESTRICTIONS WILL NOT CHANGE THIS!**

If buyers have fewer options for finding well-bred healthy animals of a breed of their choice in NSW, they will purchase animals from:

- interstate
- off the internet and
- from breeders who keep their animal in sub-standard conditions.

Buyers who purchase from less reputable sources will have less education and training from breeders and this will contribute to increasing the number of animals in shelters. The majority of dogs and cats in shelters is due to lack of knowledge of the breeds temperament, behaviour and environmental needs. This can only be changed by education — NOT restrictions.

‘The majority of dogs and cats in shelters is due to lack of knowledge of the breeds’ temperament, behaviour and environmental needs’



More importantly limiting each female to only two litters will see a larger turnover of females surrendered or abandoned. Some will see no option but to move their females on so that they can keep their numbers of fertile females within the restricted numbers in order to continue genetic integrity. The option to desex each retiring female will prove too expensive and Animal Care Australia fears this

scenario may also result in many dogs being euthanased as that is the easier way to reduce to the limits. This is actually encouraged by the ludicrous penalties attached to breeders who are found to be in excess of their permitted numbers.

Shelters will be inundated — perhaps this is what the Animal Justice Party wants?

The Animal Justice Party Policy document clearly outlines key objectives aimed at eliminating the keeping and breeding of companion animals. In particular, * Key objectives:

- To phase out the breeding and sale of all companion animals other than from shelters or rescue groups.
- To phase out the breeding of companion animals until shelters achieve no-kill status with no turn-away, then work with companion animal NGO's on only using breeding schemes that benefit the animals involved.

If you look closely at these you can see that it effectively creates a Shelter Industry by encouraging the sale of animals via shelters sourced by the companion animal breeders who are now forced to surrender their animals. While that appears to be their agenda, the truth is a vast number of animals are actually coming from unethical breeders.

(* Source: [Animal Justice Party Policy 2020](#))

“... many of the animals that end up in their shelter come from unscrupulous breeders - people who “set up a couple of dogs or cats in their backyard and breed for money, without any proper consideration for animal welfare....”

As previously mentioned, this has become a stark and frightening reality in Victoria.

Perhaps that is why they continue to ‘edit’ their Policy in order to water down the obvious agenda and appear to be more publicly supported? But has their agenda been altered as well? Events in Victoria suggest not!



Restrictions punish the innocent and responsible owners and do nothing to prevent the guilty from continuing their cruel practices!

Smaller scale breeding operations are no guarantee of improved welfare conditions.

In testimony to the 2013 Select Committee of Dogs and Cats as Companion Animals in South Australia the Animal Welfare League stated that many of the animals that end up in their shelter come from unscrupulous breeders - people who “set up a couple of dogs or cats in their backyard and breed for money, without any proper consideration for animal welfare.”

Limiting numbers will disadvantage smaller breed breeders — effectively commercialising puppy breeding

Limiting numbers will increase the numbers of breeding animals having to be removed from a responsible person’s care.

A limit law on breeders would penalise a responsible breeder with

more animals than the limit:

- who is not a nuisance or threat to neighbours.
- who keeps their animals in perfect health and conditions.
- who places animals responsibly and is a support system for the buyers, and MOST importantly,

- who sees them facing the loss of one or more of their companions.

Most people who breed see their animals as part of their family and the emotional cost to the breeder and the risk of homelessness for the animals should be paramount and not be underestimated.

Limiting the numbers a breeder can care for will not prevent breeders from keeping more than they are legally able to.

A number limit is difficult, almost impossible to enforce without increased presence of animal control or policing agencies and will lead to a decrease in micro-chipping and council registration, vetting etc. to prevent cross referencing. At any given time, numbers can fluctuate and enforcing over limit numbers is a very difficult task.

- animals will be hidden
- some litter sizes will magically increase as the breeder combines two litters to make it seem there is only one bitch etc.
- animals that are over the permitted number will not receive veterinary care or other vital welfare needs due to the fear of being exposed to having over the maximum number.
- breeders who have welcomed buyers to their property will be more reluctant to do so if they fear being caught for more than the 10 animals, they are able to have.

Commercial Considerations.

Inequitable production & trading circumstances.

Commercially there is a major difference regarding potential profits between someone [for example] who owns 10 Great Danes or 10 Chihuahuas. The Great Dane Breeder can legally produce up to 120 puppies per year. This breeder is able to legally turnover approx. \$300,000 per year, whilst the Chihuahua breeder can legally produce 30 puppies per year, with a turn-over of approx. \$40,000 per year.

There are some serious problems with this:

- Limiting numbers will give a commercial advantage to some breeders based solely on breed type or litter sizes a breed can produce.
- The ‘toy breed’ breeder who can produce fewer puppies has less choice of puppies to include in their breeding program. Number limits do not consider these types of breed specific variables.
- Limiting numbers will see breeding decisions made on breeding animals for litter sizes and market value rather than breeds most suited to families in order to be able make a viable profit on less breeding animals

Limiting numbers will impact negatively on regional and state revenue.

If breeders in each state are restricted in the number of animals they can have this will reduce the supply and not the demand, which will have negative consequences for the State.

People will purchase animals bred outside of their state from other states that have less restrictions, decreasing the sales within that state, which will have consequences for that economy and people’s livelihoods, for instance:

- a reduction in the sales of dog/cat food as there will be fewer breeding animals in the State).
- a reduction in the services required from
- veterinarians (as there will be fewer breeding animals in the State).
- a reduction in the purchase of accessories, i.e. whelping supplies and puppy supplies (as there will be fewer breeding animals in the State).



This negative impact on the state economy will especially hit rural areas. Trade for some states and their rural areas will become more disadvantaged than others.

Dogs and Cats via Pet Shops

Animal Care Australia does not believe pet shops are the most suitable environment for the sale of dogs and cats.

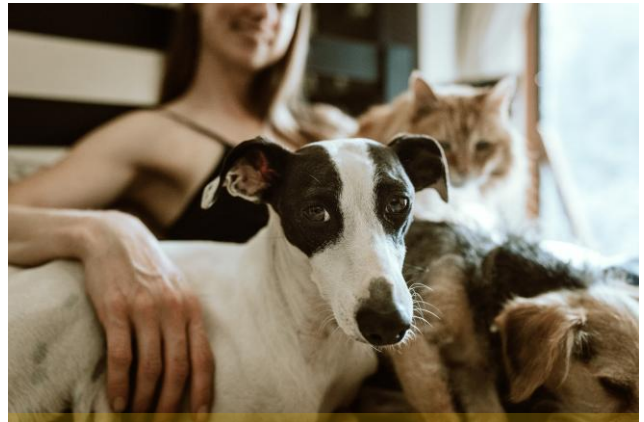
For the same reasons we do not support the sale of shelter animals from pet shops as we see no difference between the two.

If given an option between the sale at pet shops or online, Animal Care Australia believes pet shops are more easily regulated than online or car boot sales.

For this document we are focused on dogs and cats. Some concerns about the sale of dogs and cats in pet shops include:

Puppies:

- Puppies go through a fear period between 8-16 weeks and a pet shop environment is not ideal to ensure that they are not put in situations which could lead to ongoing behavioral problems such as high anxiety.
- Puppies need around the clock care so leaving puppies overnight in a shop environment is not suitable.
- Puppies need to be in a home environment at an early age as they need to be desensitised into new environments and to form routines.
- In a pet shop environment, there is not the ability for exercise as puppies require and receive with responsible breeders. In a pet shop environment, there is not the available space to ensure there are



Replacing dogs and cats in pet shops with shelter animals does not eliminate any of the concerns of selling dogs and cats in pet shops — it just adds to them!



separate spaces for eating, toileting and sleeping. This leads to toileting and sleeping issues once they are sold and are settled into a home environment.

- They don't have the required environmental enrichment.
- There are no facilities that the puppies can retreat away from the noise and attempted interactions by the public

Kittens:

- The concerns listed for puppies also apply to kittens, including separate eating facilities, establishing toileting habits, etc, which are important for kittens to ensure they feel safe and are able to be enriched
- Most pet shops do not have the facilities to house kittens in a safe manner where they can climb, explore, or hide away.



Animal Rights Extremists' requirement for pet shops to only have shelter/rescue dogs or cats for sale is fraught with issues.

As previously highlighted, a proportion of animals in shelters are those abandoned due to behavioural issues. Many shelters do not have the experience or necessary training to identify these behaviours. They also do not have the available time or skills sets to alleviate those issues with appropriate training.

Shelters desperate to save the animals (from being euthanised) colloquially known as 'No Kill Shelters,' have been known to medically treat the animals with sedatives etc, informing their new owners to continue with the medications until they expire. Once expired, the new owners find themselves with unruly animals and unable to deal, the animals are re-surrendered, often to a different shelter, and the cycle re-commences. The inclusion of pet shops in this scenario would be disastrous.

Many regulated pet shops have a requirement to accept a returned animal within a stated period of time. This in itself will ultimately lead to animals being shunted around, legal concerns under Fair Trading laws could eventuate, animals will be more likely to be euthanised.

Enforcement of Laws

A number limit will be difficult, almost impossible, to enforce without increasing and sufficiently funding the presence of animal control or policing agencies to enforce those laws. It will encourage more people to break the law potentially by not microchipping



their animals and not registering them with their local council. They may do this to prevent the cross-referencing of their animals across agencies.

At any given time, the numbers of dogs or cats on a breeding property can legitimately fluctuate for the following reasons:

- some breeders may have their animals in guardian homes off the property but will bring them onto the property to have her litter so they can ensure the health of the litter and the mother.
- dogs (in particular) come to a breeding property with visitors.
- some breeders look after puppies/kittens they have previously sold when the owners go on holidays.
- some look after their friends' animals when illness occurs.
- other dogs or cats come and go for outings, exercise, stud services etc. which makes enforcing over limit numbers a very difficult task. **NB:** This issue has been highlighted by breeders in Victoria with some breeders being fined by over-zealous Council employees who refuse to accept reasons provided by breeders.
- some dogs/cats will be hidden.

- some litter sizes will magically increase as the breeder combines two litters to make it seem there is only one bitch/queen.

Any additional animals over the restricted numbers allowed may not see a vet etc. for fear of being exposed to having over the max number.

A policy of restricted numbers such as the one proposed has many enforcement issues, not the least being:

- the number of enforcement officers available to enforce any new legislation, this includes both compliance agencies and local council rangers.
- their workload enforcing current laws and regulations and,
- the creation of unintended consequences of any new legislation, such as Councils re-zoning areas to assist in the removal of breeding in residential zones, or as in Victoria, the drafting of new planning laws restricting the numbers of animal that can be kept on an overall basis — currently no more than 5 animals (this is not exclusive to just dogs and cats) without additional permits and DA requirements.



All of which would divert vital public resources and funds to the enactment and enforcement at the expense of the enforcement and policing of other important (already implemented) animal welfare legislation.

Reduction of the ability for agencies to concentrate their efforts on those facilities that present the greatest risk of non-compliance.

It would undermine the ability to concentrate regulatory efforts on those facilities that present the greatest risk of non-compliance by expanding coverage to oversee thousands of small, low-risk breeders.

The nature of breeders who will not comply.

It is the furtive nature of illegal breeding practices of large-scale volume breeders who breed dogs/cats in substandard conditions that make their detection so difficult. They are almost always located in less urban areas with the animals kept in buildings out of sight of potential onlookers. This type of operator is never going to be led to licensing and restriction compliance and they will simply devise tactics to enable themselves to continue on without detection ensuring they treat any requirements as ‘scoff laws’. This will place a further burden on any agency or council that is responsible for locating those who are operating without a license with compliance and policing.

Without enforcement, legislation is a token gesture used to pacify interest groups.

Arguably, if existing legislation was enforced, there would be no need for further legislation.

Existing legislation covers all aspects of animal welfare, management and control with the penalties for non-compliance. Animal cruelty is already a crime.

- It is a criminal activity to keep animals (in this case dogs & cats) in substandard conditions.
- It is a breach of the existing codes of practice to sell puppies/kittens that are ill or not fit for purpose.
- It is a breach of consumer law to sell puppies/kittens which cannot be identified
- It is a breach of legislation & codes of practice for not keeping appropriate records of the breeding dogs/cats and their offspring.

All of these breaches attract various penalties and potential imprisonment. Data already suggests the policing of the laws and codes is not being adequately enforced. There is no logic in adding further rules/laws to an already overloaded enforcement agency, particularly when the existing laws and codes adequately protect the welfare of dogs and cats if enforcement was satisfactorily maintained.

All of these reasons are justification for governments to take on the ownership and responsibility of enforcement by employing animal welfare officers rather than outsourcing enforcement to charitable organisations.

Education — NOT restriction of numbers



Pets teach us empathy, compassion, responsibility, unconditional love — to name a few. They are with us for a few years of our lives — but we are with them ALL of their lives!

Animal Care Australia would like to see greater focus on the regular review of codes of practice with an improved emphasis from breeder input on the housing of and taking the science of each individual breed into greater consideration. We believe that current requirements in codes are more suited to pounds and boarding kennels and have overlooked major differences required for breeding different breeds of dogs and cats which can compromise their welfare. Rather than looking at introducing more laws and regulations we need to be looking at better ways of housing and caring for breeding animals which does not place them in undesirable situations that directly impact their welfare. According to studies there are approx. 6.4 million dogs owned and approx. 5.33 million cats owned in Australia. Each year it is estimated 450,000 puppies and 350,000 kittens are required to replace puppies/kittens from natural occurrences such as the death of family pets etc. to fill the demand.

Dogs and cats are used for a variety of reasons including companionship and the benefits of this inter-species relationship with the desire of humans to share their lives with pets is well documented.

This is not something that will change.

The demand for puppies/kittens will continue to exist. People will not miraculously want to buy less puppies or kittens just because breeders cannot breed as many.

Someone will breed these animals to fill the demand. Surely governments are not prepared to suggest that Australian families and those who use dogs as assistance dogs and working dogs should be deprived of their right to own the dogs or cats of their choice, which they have deemed is best suited to their needs, surrounds and circumstances?

Responsible Breeding —NOT less breeding!

Animal Care Australia encourages all levels of government to introduce incentives that would encourage more, not less, reputable, well educated, skill full breeders whose focus is on what is best for the animals in every aspect.

This is not reliant on how many bitches/queens they own or breed or what type they breed, or how many litters they have or where they choose to sell them. It is solely reliant on how they feel about their animals and their desire to get it right for the welfare of their dogs and cats, their breeds, future generations and the buyers. These are the breeders who should be encouraged and rewarded for their achievements and their ability to consistently breed beautiful, healthy animals that increases the joy of ownership for those who then provide them with their ‘forever homes.’



Responsible, ethical dog and cat breeders are knowledgeable and experienced. They run long term ethical breeding programs maintaining the highest welfare outcomes for their animals and are mentors to others through their club activities, usually as volunteers. Inexplicably, instead of being respected as experts, they are

painted as animal abusers and criminals. Even after they have decades of experience of producing and placing puppies/kittens without a complaint, even when they have never done anything that compromises the welfare of their animals, even when they can show they more than adequately manage the numbers they choose to keep — they still have to suffer in case someone else doesn't do it right.

These same breeders are seen as heroes by their buyers and their peers and they have made a huge positive impact on millions of families and with those who use dogs in the workplace. Their devotion to their own animals and the ones they breed is a work of love, a way of life and if by chance or design they are able to make enough money out of it to put back into their animals and do so without shame as all Australians who engage in legitimate activities and hobbies are entitled to. It is not a crime or immoral to make money from doing something you are good at and love regardless of the animal rights rhetoric and their anti-breeder marketing campaigns.

Government should not impose unwarranted and inequitable restrictions on low-risk breeders that erodes their legal rights and reduces consumer choice without demonstrating the positive and measurable effects on the animals the legislation is supposed to protect.

Dog and cat breeders should not automatically be considered to be potential animal abusers and those doing the right thing should be rewarded rather than penalised, prohibited and punished under the guise that some random person somewhere breeds dogs in substandard conditions without care or concern for their animal's welfare.



Breeds at risk.

Limiting breeding and the number of bitches/queens breeders can keep jeopardises vital gene pools. Genetics and their integrity are a major factor in animal welfare. We have all read the stories of in-breeding and its health effects — caps on numbers will only lead to desperate breeders having no option but to in-breed.

DOG BREEDS ALREADY AT RISK:

Following the link to the [Dogs Australia](#) statistics highlights the drastic reduction in breeds registered with that organisation.

Animal Care Australia has chosen the registry due to it being a national registry. Other registries do not contain national scale data.

The latest numbers provided are for 2018 to 2024. These dates are extremely important as they highlight the national drop in breeding numbers since number restrictions were introduced into Victoria in September 2017 and the following years in other states.

The effect shown highlights the impact of introducing restrictions and the large proportion of breeds quickly becoming extinct in this country. Should these numbers continue to decline many of these breeds will be considered as currently 'vulnerable' or will face 'extinction' within Australia within the next five years.



Animal Rights Extremist's (ARE's) and governments constantly promote the public should only seek a dog from a registered breeder — the very same breeders that are now producing less dogs due to restricted numbers and available breeding mates. There is a general 'guide' that any breed in numbers of

less than 100 puppies in a year place that breed in a vulnerable situation. This is to ensure responsible numbers are maintained to sufficiently rest bitches and maintain a strong genetic availability.



Animal Care Australia has engaged with government on a range of issues throughout Australia. The list that follows outlines some of these matters, including parliamentary inquiries, Ministerial, MP, Department Director meetings, appointments as major stakeholders, and

numerous submissions in jurisdictions nationally.

Animal Care Australia will continue to stand up for pet and domestic animals and their owners. Here is just some of what we have done and will continue to do:

- Lobby for higher animal welfare outcomes in welfare Acts
- Change the narrative of animal welfare from punishment to education
- Make higher animal welfare the ‘norm’ among pet owners
- Oppose restricted breeding legislations.
- Oppose restrictions on pet numbers that can be kept (now only five animals in some Local Councils)
- Oppose the creation of an unregulated Shelter Industry
- Introducing education about pet ownership into primary & higher school education curriculums
- Encourage education on responsible pet ownership, responsible breeding, and responsible buying of pets.
- Lobby for greater funding of education on responsible pet ownership, responsible breeding, and responsible buying of pets.
- Support pets in strata
- Lobby for greater accountability of animal welfare compliance organisations
- Oppose Animal Rights Extremist propaganda
- Oppose Animal Rights Extremist influences on government
- Oppose ‘personhood’ rights being provided to animals
- Encourage research into more alternatives for 1080
- Encourage expansion of and education about existing alternatives for 1080
- Support continuation of animals in education arena (zoos, mobile exhibitors etc)
- Support and legislate for the protection of animal victims of domestic violence

- Oppose programs that allow the release or continuance of feral animals in the natural environment
- Support initiatives for the subsidising of de-sexing programs
- Strengthen animal welfare Acts by removing ambiguity and clearly defining animal cruelty
- Ensuring species specific Standards (Codes Of Practice) for keeping and breeding are regularly reviewed and maintained
- Legislate against leaving animals (not just dogs) in hot vehicles
- Supports the expansion and continuation of native animal keeping with appropriate licensing and welfare standards
- Oppose trail closures to horse riders, carriage drivers and dog walkers

Our goal is to promote and encourage high standards in all interactions with the animals in our care. To encourage responsible pet ownership and the respectful treatment of all animals in our community.



**There are many health benefits of owning a pet.
Support responsible breeding and report unethical breeders.**