

25th April 2022
The Editor, Michael Carroll
Sunday Telegraph
news@sundaytelegraph.com.au

RE: ‘Puppy Farming is out of control’ by Emily Burley

Dear Mr Carroll and Ms Burley

Animal Care Australia is appalled by the lack of journalistic integrity and blatant bias depicted within Ms Burley’s article, dated 24th April 2022.

The integrity of the article must be questioned given that it relied solely on quotes made by the Honourable Emma Hurst – Animal Justice Party – an extremist animal rights advocate and ex-media officer for PETA and campaign coordinator for Animal Liberation..

Animal Care Australia notes Ms Hurst’s devious attempt to thwart the truth in her quotation of statistics taken from the RSPCA’s report on the Puppy Farm Taskforce. Ms Hurst relies on information from a submission provided as part of the NSW Parliamentary Inquiry into Puppy Farming. Within that the RSPCA state: ‘Over an 11-month period (1 April 2021 to 25 February 2022), of the 133 breeding establishments visited, 77% were not compliant with relevant animal welfare laws.’ Given your article was about Puppy Farming and in this instance the Taskforce, we would have expected Ms Burley to research data on the entirety of the Taskforce and not just a selected period.

What Ms Hurst and Ms Burley both failed to state was the testimony provided by the RSPCA¹ during the Inquiry which indicated:

‘For a period from August '20 through to February '22, there were 448 inspections and those 448 inspections generated 199 revisits. Revisits are normally conducted when it has been identified that there is a noncompliance issue with the code. There were 224 section 24N notices issued, which obviously then would generate a revisit.’

A 24N Notice is given as a warning that something needs correcting or updating and does not directly imply there is full non-compliance, thus Mr Meyers’ (RSPCA Chief Inspector) terminology of ‘non-compliance issue’. Full non-compliance comes following a revisit and a penalty infringement is issued. In this case only 62 infringement notices were issued.

Taking this into account and depending on your journalist’s focus, **the truth is from 448 inspections only 224 potential issues of non-compliance were found**, after which, following being advised there was an issue **only 62 remained non-compliant – a statistic of just 14%**.

This is a major difference to Ms Burley’s claim of almost 80% and Ms Hurst’s 77%!

Ms Hurst’s claims that ‘*paperwork were vital to animal care*’ is in itself a stretch of the facts. Paperwork required to be kept under the code also includes a ‘written return policy’ and Animal Care Australia has documented proof that this alone accounts for some of that missing paperwork, supporting claims made by breeders that missing paperwork is minor.

While Animal Care Australia acknowledges the code requires breeders to keep records of immunisations and other veterinary records, Animal Care Australia can also confirm some of the veterinary records in question were being maintained by the breeders digitally and not in paper form. Paper form records were required by the code at that time and many breeders were ordered to provide paper copies upon

¹ [Select Committee on Puppy Farming in New South Wales \(nsw.gov.au\)](https://www.nsw.gov.au/select-committee-on-puppy-farming-in-new-south-wales)

the inspectors revisit – also accounting for the issue of ‘non-compliance’. It should be noted those records are also kept and maintained by the treating vet and are **certainly not the neglect of ‘really important care’ as claimed by Ms Hurst.**

A vast number of the issues were indeed incorrect fencing heights – a matter that created a large amount of contention when people were issued warnings to raise their 1.2m fencing to 1.8m – despite the fact many of the breeds kept were small breeds, and in some cases 1.8 was not approved by Council, and in other cases the pens the dogs were held in had 1.8m enclosure heights, but because the dogs were let out of their enclosures to run and exercise, the breeders boundary fences were considered non-compliant.

Another misdirect from Ms Hurst claiming puppy farmers are setting up on the border between Victoria and NSW is not substantiated. Animal Care Australia recently surveyed all Councils in NSW seeking data on the total number of DAs, and DAs in the past 3 years, both rejected and approved for what Council refer to as ‘dog breeding facilities’. We received **84 responses from 128 Councils**. The majority reported **no ‘puppy farms’** and most of the others just 1 or 2 approved breeding facilities. In addition, **just 15 new breeding facilities state-wide** were recorded in the past 3 years. Of the **10 Councils on the border, 9 of whom responded, only 3 DAs have been identified in the past 3 years** – one facility being the Moama facility is well known to authorities.

The only element within your article that Animal Care Australia can agree with Ms Hurst on is the charitable organisations are not funded sufficiently to carry out compliance. However, we do not believe the responsibility of enforcing compliance should be out-sourced to the charitable organisations. The NSW Department of Primary Industries should be undertaking this responsibility itself.

Your entire article simply highlights the unscrupulous lengths a very desperate Ms Hurst will go to in order to validate an Amendment that she knows is not fully supported by the RSPCA, the Animal Welfare League, many Local Councils or other political parties.

Ironically, had Ms Hurst actually consulted with Animal Care Australia, and the dog and cat breeding associations, she may well have found support in trying to end ‘puppy farming’ – but she didn’t because that is not her goal. The Animal Justice Party – just like PETA – want to see the end of dog and cat breeding by private owners and only being carried out by their beloved and approved Shelters.

You should also note Animal Care Australia provided a submission to, and attended as a witness at the Inquiry into Puppy Farming. A copy of our submission and opening statement is attached for your reference.

In the future, rather than relying on Ms Hurst’s untrustworthy and ideological viewpoint, we strongly suggest when formulating articles relating to pets and companion animals in order to produce a balanced article that your newspaper should fact check statements from politicians before printing them without disclaimers. Animal Care Australia welcomes that opportunity.

In this instance, the statements made by Hurst did not match what was said on the day.

Kind regards,



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Who is Animal Care Australia?

Animal Care Australia (ACA) is a national incorporated association established to lobby for real animal welfare by those who keep, breed and care for animals. Our goal is to promote and encourage high standards in all interactions with the animals in our care.

ACA is currently recognised by the **NSW Department of Primary Industries** as a key stakeholder, we are listed as a consulting stakeholder in the NSW Animal Welfare Review of POCTAA and its associated regulations. ACA will be directly consulting and advising during that review, including revising codes of practice for the keeping of all pets.

ACA encourages continued development of animal welfare standards and Codes of Practice for animal husbandry, breeding, training, sale and sporting exhibitions for a wide range of animal species, including pets, companion animals, animals used for educational or entertainment purposes or kept for conservation.