

30th August 2022  
Hon Dugald Saunders MP  
Minister for Agriculture, and  
Dr Kim Filmer  
NSW Chief Animal Welfare Officer

**RE: Puppy Factory Education Initiative**

Dear Minister and Dr Filmer,

Animal Care Australia (ACA) would like to applaud the newly launched Puppy Factory Education Initiative.

As you may be aware, ACA strongly advocates for education (over regulation) and this is a good first step in what is a long overdue process in ensuring the general public understand the risks of purchasing a dog or cat.

Puppy Factories are driven by demand for quick turnaround puppies or kittens and this demand is driven by an uneducated public who are in most circumstances unaware of the legal requirements of breeders and even their own responsibilities as buyers. ACA believes there is a lot more work to be completed to adequately inform all parties involved and in doing so change the narrative being orchestrated by the animal rights movement, in particular the Animal Justice Party, Oscar’s Law and the Greens.

ACA welcomes the opportunity to participate in the second phase of the initiative that is being conducted by the consultancy firm, Foster Horses, and we thank you for recognising us as a key stakeholder in this process.

ACA has reviewed the Department of Industries website content that is promoted as a part of the social media campaign, and while we support the intent of the content and information being provided, we do wish we had been requested to review it prior to it going public.

There are points that we feel need to be brought to your attention:

1. Under the “How to Choose a responsible breeder” section the final point: “Consider purchasing a pet from a rescue shelter” should NOT appear here. Choosing a pet from a shelter has nothing to do with selecting a responsible breeder.

ACA suggest this point be moved to the first paragraph of the page to read: “Buying a new puppy or kitten is an exciting time. You first should decide whether you want to purchase your pet from a breeder or from a rescue shelter. When choosing a breeder it is important to find out if you are buying from a responsible breeder.”

2. “How to Choose a responsible breeder” point 1: “Research the breeder or seller and visit the facility where the animal has been bred or is being housed” does raise some concerns for us. While we agree the buyer should see where their new pet has been bred and is being cared for, many breeders who hold rarer or more expensive breeds are extremely reluctant to simply open their homes up to every prospective buyer as this is a major security issue, both personally and for the animals. People will start reporting these breeders as potential ‘factories’ simply because of your dot point and the breeders’ reluctance.

ACA suggests this point be expanded further to allow for the breeder to carry out live virtual walk through sessions allowing for the breeder and buyer to interact while still protecting the security of the premises. This is paramount given the number of times buyers waste breeders time and more often than not do not follow through with the purchase. To be clear, ACA is not suggesting that the buyer does not attend the property at all, just simply that this step should be completed further into the sale, following some previous interactions, or at the point of picking up the animal rather than at the first point of enquiry.

3. “Avoiding scams – questions to ask before purchase” point 3: ‘Has the breeder/seller asked you to pay any money for the puppy or kitten before you have been able to see the animal in person?’ Again, this point does not indicate the seller/breeder is a scammer. Many responsible breeders have waiting lists, and request a deposit be placed in order for the breeder to avoid being scammed by time-wasting buyers. These deposits can be requested at the point of birth of a litter or even a season in advance, meaning the

buyer may not see the actual animal until further into the process – this does not mean the breeder is attempting to scam the buyer. Again, as per previous point this needs further explanation.

In addition, how is a buyer able to see the animal in person if purchasing from interstate or a good distance away from the breeder?

ACA suggests this point be expanded to include:

*‘Has the breeder/seller asked you to pay any money for the puppy or kitten before you have been able to see the animal in person? If so, you should consider:*

- *Are you being requested to pay a small deposit to secure the puppy/kitten, having been able to see the animal via a live virtual interaction or in person?*
- *Do you feel comfortable placing such a deposit?*
- *Is the breeder providing you documented receipt of your money, where that receipt outlines the breeder’s details? Or,*
- *Are you being requested to pay the full amount upfront – this is more likely to be a warning sign.*

4. “Avoiding scams – questions to ask before purchase” point 4: ‘Are all of the advertised microchip numbers valid when you complete a search on the [NSW Pet registry](#), or are there invalid numbers?’ How does this verify a buyer is not dealing with a scammer? When submitting to Inquiries and consultations, ACA has consistently stated the means by which scammers are abusing the system, that being they are copying down BIN and microchip numbers from advertisements placed by legitimate breeders. A scammer simply needs to copy the microchip numbers from ads for the same breed as they are trying to sell and there is no way the buyer is able to verify who they are dealing with.

In order to respond here, ACA searched the Pet Registry with a valid microchip number. The results informed us the breed, age, desexing status of the animal. That is, it! No information that allows the buyer to verify the microchip number is actually associated to/with the seller/breeders’ association. Clearly if a number has just been invented, the Registry will not find it, but if it has been copied, then the inclusion of this dot point is moot. This will place the buyer into a false sense of assurance they are dealing with a responsible seller.

**ACA’s greatest concern with the current DPI website information page is the encouragement to report anyone believed to be a scammer. As you can clearly see by the issues, we have raised this equates to the huge potential of many legitimate breeders being reported as puppy factories and the RSPCA claiming they have ‘just cause’ to carry out more investigations without any true basis of fact. This is extremely concerning.**

ACA sincerely congratulates your office and the DPI for identifying the need for further education and for implementing the current phases. To be clear, we do not want to take anything away from this, in fact we support there being more educational initiatives, but we do request we are consulted on these PRIOR to them being made public.

Kind regards,



Michael Donnelly  
President  
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