



Animal Care Australia

2021

BAN UNETHICAL BREEDING NOT PUPPY BREEDING



Protect responsible breeders

October 2021

Animal Welfare is Animal Care

**ITS NOT ABOUT NUMBERS — IT'S
ABOUT EDUCATION, EARLY
INTERVENTION AND COMPLIANCE!**



“Animal Care Australia acknowledge the Traditional Custodians of the land on which we reside, and pay our respects to their Elders past and present.”

‘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 unintended consequences.

This document concentrates on dogs and cats — the proposed victims of impending proposed amendments to the Companion Animals Act 1998 introduced by Hon. Emma Hurst from the Animal Justice Party.

Animal Care Australia cannot support any amendments which see caps/restrictions placed on the number of females breeding or limits to the number of litters each female can have beyond those already legislated within the Companion Animals Act and the Animal Welfare Code of Practice for breeding dogs and cats in NSW 2009 (reviewed & updated 2021).

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.



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What does ACA 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).

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

- ⇒ **ACA implores government to provide more adequate funding for educating the public on their responsibilities as pet owners including supporting & promoting animal keeper associations & clubs.**
- ⇒ **ACA encourages government & local council to implement responsible breeder programs.**
- ⇒ **ACA 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.**
- ⇒ **ACA 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.**
- ⇒ **ACA implores all political parties to be wary of policies that encourage the creation of a 'shelter industry'.**

ACA sees no reason to impose more restrictions than those currently legislated.

What is a 'puppy farm'?

ACA'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.'

It is generally agreed 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'.

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 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?

"... 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 ACA, 20/9/2020.



What are the solutions?

There is no easy one-step to fix all solution. The fact of the 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.



⇒ **ACA 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 into 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 one's 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 often 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 it's 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 without any stakeholder or public consultation — and most residents are completely unaware these policies exist.

The RSPCA and to a far lesser 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.

⇒ **ACA 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

ACA opposes attempts to reduce, restrict or impose caps on the numbers of animals being kept



is and how that provides healthier and more stable puppies and kittens.

⇒ **ACA 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.**

RSPCA & AWL both have the responsibility to monitor and respond when complaints are received. Additional funding is necessary for this

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

to be enhanced. However ACA strongly encourages government to fund more staffing for 'prevention units' and 'prevention education' which in the longer term will reduce the number of actual compliance issues received and need to prosecute.

⇒ **ACA 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 number of self-microchipping



Its not about numbers. It's about education, early intervention and compliance!

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**

In NSW the Pet Registry currently has the following issues:

- 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.

- ACA has concerns the Registry is being used by Councils to ascertain the number of animals at each property and the number of litters being produced – to the detriment of the breeders privacy – particularly given the high level of flaws and inaccurate information being stored within the Registry.

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

In the meantime in NSW, ACA recommends the Office of Local Government (OLG) removes the ownership and responsibility of maintaining and updating the Registry from Local Councils and creates a team within the OLG to oversee the Pet Registry, its functionality as well as the regular updating. Councils are simply not reliable and in many cases are the reason why the Registry is failing and unviable. If that is not possible then ACA recommends the OLG implements policies that:

- requires Councils to update records within a set period of time.
- hold Councils responsible if they fail to maintain the records within that time frame.



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The Animal Rights Agenda!

The attempt 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.

Key Objectives

1. Reframe companion animals as individuals rather than as commodities and promote the benefits of a beloved companion animal (e.g. lower stress levels).
2. Provide education on the proper care of animals to prevent cruelty and neglect while also increasing resources to investigate and prosecute animal cruelty (see our Animal Law policy).
3. 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.
4. Promote animal adoption ahead of commercialised breeding.
5. Provide shelters with adequate funding to cater to lost and unwanted animals, preventing euthanasia other than for medical necessity.
6. Increase desexing levels through targeted government subsidies and community education programs, while investigating other options proven to work in reducing the oversupply of unwanted animals.
7. Outlaw puppy farms and kitten farms (see our Puppy Farm policy).
8. Introduce a nationally consistent Breeder Permit system to stop dodgy breeders and reduce the number of animals born without loving homes available for them.
9. Phase out the breeding of animals with inherent genetic problems.
10. Repeal breed-specific legislation throughout Australia.
11. Stop unnecessary discrimination against tenants with companion animals and increase the availability of homes where they are allowed, balancing the rights of landlords, tenants and companion animals.
12. Ensure our cities are suitable for companion animals with suitable toilet options, recreational spaces and better companion animal-friendly transport.
13. Include companion animals in probate and guardianship laws so that they are adequately cared for after the death or incapacitation of a human guardian.

ticeparty.org/join

The AJP have recently just updated their Companion Animals Policy (likely due to the older version being blatantly anti-animal keeping). The current Companion Animals Policy is still of concern with particular attention to Key Objective 9 - 'Phase out the breeding of inherent genetic problems'. You may not be aware a vast number of dog breeds suffer with genetic problems. RSPCA Aust highlights *"There are a number of significant animal welfare problems associated with breeding of certain dog breeds and pedigree dog breeding. These include exaggerated physical features, inbreeding and inherited diseases. Each pedigree breed has a 'breed standard' which is a set of strict guidelines describing the way the breed should look Unfortunately, some of the breed standards require exaggerated looks such as flat faces, abnormally large eyes, excessively wrinkled skin or disproportionately short legs. Exaggerated features can cause pain and distress to dogs and seriously compromise their welfare and their ability to lead a normal comfortable life. For some breeds overtime, these physical features have become increasingly exaggerated, for example, breeders have selected for even flatter faces or even shorter legs, further compromising animal welfare."* (Source: <https://kb.rspca.org.au/knowledge-base/what-animal-welfare-problems-are-associated-with-dog-breeding/>)

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



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 it's 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**. (See page 23)

Animals Welfare or Animal Rights?

Animal welfare and animal rights are often thought to lie on the same continuum – this is not the case. Generally accepted principles defining these terms are as follows.

Animal Welfare

1. The need for a suitable environment.
2. The need for a suitable diet.
3. The need to be able to exhibit normal behaviour patterns.
4. The need to be housed with, or apart from other animals.
5. The need to be protected from pain, suffering, injury and disease.

Animal Rights

1. Animals are sentient beings that should not be owned by humans.
2. Humans and non-human beings should have equal rights both ethically and legally.
3. Animals should not be kept in captivity, including for food, entertainment, research, companionship, conservation or any other reason.

What does “cap the numbers of breeding females and restrict the number of litters they can have” sound like to you?

Joint Select Committee on Companion Animal Breeding Practices in NSW — Aug 2015.

In 2015 the Joint Select Committee on Companion Animal Breeding Practices in NSW found “... a finding that the number of animals kept by a breeder is not in itself a factor which determines the welfare of breeding animals.”

As part of its Findings and Recommendations, the Committee commented: “The Committee agrees with several witnesses, including the NSW Government witnesses, that the management of companion animal breeding practices in NSW is stringent and arguably the strongest regime in place nationally.”

In addition:

3.7 The Committee heard no evidence which outlined how to calculate the number to which breeders should be limited.

3.8 The Committee heard from a number of stakeholders that health and welfare issues for breeding animals were not confined to breeders, or to breeding establishments with large numbers of animals.

3.11 The Australian Veterinary Association (AVA) submitted that the scale of a breeding operation was not indicative of welfare issues and large scale breeders could be reputable and caring, citing Guide Dogs NSW as an example of a large scale breeding operation that ensures excellent breeding and welfare standards for the animals in their care. The submission further observed that AVA vets had reported many instances of individual dogs which were overbred and received inadequate health care, leading to a shortened and reduced quality of life.

3.12 The Chief Inspector of the Animal Welfare League (AWL) NSW, Mr Ian Hughes, commented that in his experience, the welfare of breeding animals owned by smaller breeders was frequently a cause for concern: “As far as the welfare side goes, from my experience, by far the biggest area where we have problems is the small backyard breeder, people who have one, two, three dogs. They advertise online, you meet them in a car park. These animals are not vaccinated or microchipped and there is no comeback. We get lots of complaints from people like that and we have no contact point for them.”

3.13 Breeders expressed a number of concerns in relation to limiting the number of animals that they could keep. Concerns included loss of genetic

diversity, an increase in overbreeding, a greater shift to unregulated 'underground' breeding, and issues for particular breeds.

3.14 Limiting the numbers of animals allowed to be kept by breeders could impact on legitimate breeding programs, particularly for rarer breeds, leading to loss of bloodlines and an increase in health problems associated with smaller gene pools.

3.17 The Committee heard, however, that limiting the number of cats allowed to be kept by breeders could undo years of careful breeding practices aimed at eliminating certain genetic problems:

"... if breeds have any particular genetic problems, that will obviously make it more likely that they will again become more prominent with a lot of breeders with those gene pools. For instance, we have had experimental breeding programs where at times cats have been outcrossed to other breeds or even suitable domestics to get away from those sorts of genetic problems. If you start limiting them again, all of that work and good health will be gone" .

Ms Maureen Norberry, Vice-President, NSW Cat Fanciers Association Inc, Transcript of Evidence, 16 July 2015

3.21 Dr Katharine Schoeffel, a veterinarian and breeder of crossbred dogs, submitted that limiting the number of animals allowed to be kept by breeders did not address animal welfare, but that 'arbitrarily' limiting dog numbers would lead to the price of dogs rising and provide financial incentives for an increase in 'underground' breeding practices.

3.42 The Committee heard that not all people were interested in adopting older or rescued dogs, typical of the dogs available from shelters and pounds: *"The community is very broad; some people feel they want to have a pup so a rescue dog may not be suitable for every family and every person. We need to provide an environment where people can still buy a puppy with confidence and know that it is being bred*

in an ethical area with good welfare standards" Mr John Grima, Retail Director, Pet Industry Association of Australia, Transcript of Evidence, 16 July 2015.

COMMITTEE COMMENT

3.59 The Committee received a 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 Committee acknowledges these submissions, it considers that they were unable to articulate how limiting the number of animals might improve animal welfare outcomes. It was also not possible to determine why an arbitrary number of animals, such as 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.

3.60 The Committee received no strong evidence that the scale of breeding operations correlated with the welfare of the breeding animals. Indeed, the Committee received evidence from local councils, animal shelter operators, veterinarians and AWL NSW of inadequate welfare conditions in many small scale breeding operations consisting of only one or two breeding animals.



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 ...

How can you consider any restrictions?



Current NSW Legislation

NSW currently has laws and codes of practice for everyone who breeds 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:

- Prevention of Cruelty to Animals Act,
- NSW Companion Animals Act, and
- NSW Animal Welfare Code of Practice for breeding dogs & cats.

They also include Standards [which are compulsory] and Guidelines.

Development applications and approvals are required from local councils before any person can utilise a property to breed their animals, as a hobby or commercially, and if requirements are not met, which include welfare and environmental compliance, the applicant will not be given approval to undertake breeding activities.

The NSW Animal Welfare Code of Practice for breeding dogs and cats has clear limitations on breeding.

Compulsory Standards:

Section 10.1.1.9 Bitches must not have more than two litters in any two year period, unless with the written approval of a veterinary practitioner.

Section 10.1.1.10 Queens must not have more than three litters in any two year period, unless with the written approval of a veterinary practitioner.

If a bitch is only allowed to breed no more than two litters in every two year period and each bitch must be rested for the remainder of that two year period, then having multiple bitches 'cycling' over that two year period:

- ◆ maintains healthier bitches,
- ◆ continues the production of the gene pool,
- ◆ maintains respectable supply of puppies 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 the Animal Justice Party. The problem is with an uneducated public! Make the government fund more education!

A decrease in puppies/kittens, leads to an increase in selling value, encouraging more underground and irresponsibly bred puppies & kittens.



**When supply is
restricted
demand is
increased.**

Victorian Legislation is a disaster!

Don't 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**
- * **healthy puppies and kittens**
- * **breeding females available to other breeders for genetic diversity**

With the restriction of only 10 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>)

**When demand is
increased values
skyrocket!**

**Increased values equals
more incentive to
produce irresponsibly**



Had the supply of puppies not been so drastically reduced in Victoria due to the 'puppy farm legislation' would Victoria currently have these exorbitant prices?

RSPCA VIC records 26,000 applications for dogs.

With the extreme hike in the cost of a puppy in Victoria — the cheapest reported to be \$5000 — the Victorian RSPCA has seen a rise in applicants to adopt a dog.

There are also reports registered breeders have had to match market rates, to avoid creating a secondary puppy market. Reports also state people are purchasing puppies for a cheap price (from unregistered breeders) then turning around and immediately reselling those puppies for a greater amount.

The price of a cavoodle during the midst of the pandemic exceeded \$10,000. If the demand for puppies was not there then the sale price of puppies would drop, reputable breeders would not have waiting lists for puppy sales two years in advance and breeders who breed in volume solely for profit would lose the incentive to keep breeding them.

RSPCA's Tegan McPherson said ...

"We have seen in excess of 26,000 online applications to adopt a pet since the start of the pandemic."



Photo of Tegan McPherson: (ABC News: Patrick Rocca)

Source: <https://www.abc.net.au/news/2020-09-16/demand-for-dogs-soars-during-lockdown-prompting-a-price-surge/12626294>

Limiting numbers will not stop some people who breed dogs/cats treating them badly.

Victorian Government scrambles to fund shelters and seeks 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 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?>)

Health & Welfare Considerations.

ACA 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 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 take into account 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.

**Animal Welfare is at risk:
Limiting the numbers a breeder can keep
effectively limits their choices for
selecting only the healthiest and best
animals**



'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'

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



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

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.

Pedigree show cats are judged against a Breed Standard. Each breed has their own Standard and the Standard is seen to be the “perfect” cat.

At a Cat Show the Judges evaluate each individual cat against that breed's particular Standard. Participation in Cat Shows can help a breeder to evaluate if the conformation of their breeding cats are in line with that Breed's Standard.

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 well temperamentated, healthy animals and the death of a stray dog in a shelter. Most responsible breeders

“... 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....”



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.

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 animals 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.

More importantly limiting each female to only two litters will see a larger turnover of females surrendered or abandoned. Some will see no



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

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!

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 ACA fears this scenario may also result in many dogs being euthanased as that is the easier way, and 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 2019 Animal Justice Party Policy document clearly outlines key objectives aimed at eliminating the keeping and breeding of companion animals. In particular, Key objectives:

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

If you look closely at Objective 4 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.

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

Perhaps that is why this Policy was altered in 2020, but has their agenda been altered as well? Events in Victoria suggest not!

(Source: <https://animaljusticeparty.org/wp-content/uploads/2019/05/COMPENDIUM-NAT-WithPositions.pdf?>)



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 than 10 animals 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 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 potentially produce up to 120 puppies per year, with a pre-Covid average price per puppy, this breeder is able to legally turnover approx. \$300,000 per year, whilst the Chihuahua breeder can legally potentially 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 take into account 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 NSW are restricted in the number of animals they can have this will reduce the supply and not the demand, which will have negative consequences on the State.

People will purchase animals bred outside of NSW decreasing the sales of NSW bred animals which will have consequences for the NSW economy and peoples livelihoods, for instance:

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

This negative impact on the NSW economy will especially hit rural areas. If the proposed amendments are implemented by the NSW Government they will effectively be giving breeders from other states and other countries an advantage over NSW trade, income and livelihoods.



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!
Especially when more sales will move to unethical online transactions that will not be policed or regulated.**

Dogs and Cats via Pet Shops

ACA 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, ACA believes pet shops are more easily regulated than online or car boot sales.

For the purpose of this document we are focussed on dogs and cats. Some concerns for 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 to 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.



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

- ◆ In a pet shop environment, there is not the available space to ensure there are 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 to 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.

The AJP's requirement for pet shops to only have shelter/rescue dogs or cats for sale is fraught with issues.

As previously highlighted a large 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) 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 micro-chipping 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:

The 2019 NSW Inquiry investigating the compliance agencies identified the need for a major increase in funding from the Government to meet the current needs — adding further restrictions will add a larger figure to the amount of funding required.

**Responsible breeders SHOULD be treated as HEROES - NOT CRIMINALS.
Don't punish the many for the actions of the few!**



- ◇ 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.

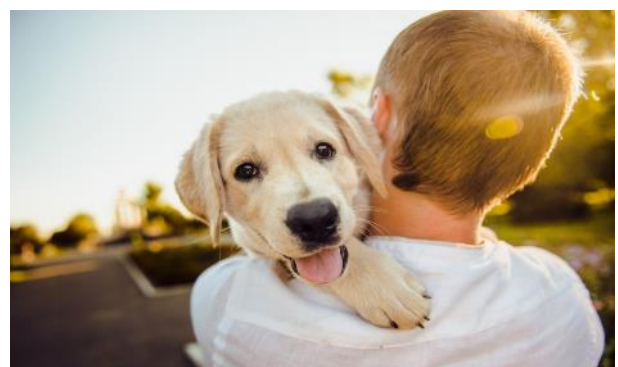
A policy of restricted numbers such as the one proposed has many enforcement issues, not the least being:

- 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 like 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 code 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 can not 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.

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!



Education — NOT restriction of numbers

ACA believes the current NSW legislation is more than adequate to ensure the welfare of breeding dogs and cats as well as the litters they produce.

We would like to see better focus on the codes of practice with a greater 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 over looked 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. 4.8 million dogs owned and approx. 3.9 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 in NSW 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 this Government is 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!

ACA encourages Governments 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.'

Registered, 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.

Loving keepers and breeders — NOT animal

abusers!

This government should not impose unwarranted and inequitable number 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.

Dog and Cat 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 of animal welfare. We have all read the stories of in-breeding and its health affects — caps on numbers will only lead to desperate breeders having no option but to in-breed.

DOG BREEDS ALREADY AT RISK:

The tables below show the drastic reduction in breeds registered with the Australian National Kennel Council (ANKC). ACA has chosen the ANKC registry due to it being a national registry. Other registries do not contain national scale data.

The numbers provided are for 2017 to 2020. These dates are extremely important as they highlight the national drop in breeding numbers since number restrictions were introduced into Victoria in September 2017.

The effect shown highlights the impact from just one State introducing restrictions. Should additional States also restrict numbers a large proportion of breeds will quickly become extinct in this country.

The breeds in **red** have seen a reduction in the numbers being registered. 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. Those in **BOLD** have already reached one of those statuses.

GROUP 1

TOY BREEDS	2017	2018	2019	2020
Affenpinscher	32	42	31	27
Australian Silky Terrier	197	180	157	146
Bichon Frise	420	376	363	301
Bolognese	0	0	0	1
Cavalier King Charles Spaniel	2491	2417	2170	2360
Chihuahua (Long)	619	547	512	526
Chihuahua (Smooth)	734	704	729	676
Chinese Crested Dog	197	213	161	196
Coton De Tulear	8	12	22	28
English Toy Terrier (Black & Tan)	65	50	50	45
Griffon Bruxellois	137	243	233	257
Havanese	374	397	457	494
Italian Greyhound	607	624	616	670
Japanese Chin	40	45	57	53
King Charles Spaniel	33	9	36	34
Lowchen	67	67	66	65
Maltese	243	215	194	203
Miniature Pinscher	204	211	195	208
Papillon	402	372	341	314
Pekingese	124	161	110	170
Pomeranian	490	465	504	553
Pug	1506	1324	1222	978
Russian Toy (Smooth)	15	20	16	39
Russian Toy (Long)	0	33	50	31
Tibetan Spaniel	171	195	183	167
Yorkshire Terrier	208	211	225	206

GROUP 2

TERRIERS	2017	2018	2019	2020
Airedale Terrier	328	323	364	242
Amer. Hairless Terrier	4	1	5	0
American Staffordshire Terrier	1746	1779	1484	1633

TERRIERS	2017	2018	2019	2020
Australian Terrier	311	332	276	414
Bedlington Terrier	40	55	48	45
Border Terrier	158	181	193	182
Bull Terrier	922	890	703	569
Bull Terrier (Miniature)	339	421	405	368
Cairn Terrier	219	222	274	258
Cesky Terrier	5	0	5	0
Dandie Dinmont Terrier	15	6	7	16
Fox Terrier (Smooth)	275	229	260	217
Fox Terrier (Wire)	53	52	43	78
German Hunt. Terrier	12	31	0	16
Glen of Imaal Terrier	8	5	0	0
Irish Terrier	42	107	87	72
Jack Russell Terrier	837	787	831	849
Kerry Blue Terrier	40	25	36	28
Lakeland Terrier	61	61	50	55
Manchester Terrier	44	24	22	21
Norfolk Terrier	16	13	10	22
Norwich Terrier	18	12	13	19
Parson Russell Terrier	30	25	35	24
Scottish Terrier	221	188	178	220
Sealyham Terrier	7	13	15	11
Skye Terrier	25	31	21	20
Soft Coated Wheaten	114	147	130	154
Staffordshire Bull Terrier	4356	4401	4216	4515
Tenterfield Terrier	368	511	443	505
Welsh Terrier	40	26	51	39
West Highland White	849	935	979	934

GROUP 3

GUNDOGS	2017	2018	2019	2020
Bracco Italiano	23	9	25	24
Brittany	144	170	164	197
Chesapeake Bay Ret.	23	55	43	57
Clumber Spaniel	21	21	30	24
Cocker Spaniel	1503	1439	1520	1649
Cocker Spaniel (Amer)	80	81	86	89
Curly Coated Retriever	109	97	126	66
English Setter	50	91	70	93

GUNDOGS	2017	2018	2019	2020
English Springer Spaniel	438	483	377	518
Field Spaniel	30	23	40	2
Flat Coated Retriever	49	81	94	77
German Shorthair Pointer	812	1030	878	995
German Wirehair Pointer	107	119	94	90
Golden Retriever	3150	3028	3199	3836
Gordon Setter	49	34	81	10
Hungarian Vizsla	597	594	645	677
Hungarian Wirehaired Vizsla	8	3	35	26
Irish Red/White Setter	19	22	6	15
Irish Setter	183	140	158	182
Irish Water Spaniel	4	13	7	14
Italian Spinone	1	9	5	14
Labrador Retriever	5330	5643	5239	5722
Lagotto Romagnolo	325	401	438	406
Large Munsterlander	12	12	16	13
Nova Scotia Duck Tolling Retriever	98	90	128	117
Pointer	137	128	105	159
Spanish Waterdog	0	2	22	8
Sussex Spaniel	1	0	0	3
Weimaraner	426	512	409	347
Weimaraner (Longhair)	53	30	21	38
Welsh Springer Spaniel	68	95	84	48
Wirehaired Slovakian Pointer	0	0	0	9

GROUP 4

HOUNDS	2017	2018	2019	2020
Afghan Hound	37	82	73	66
Azawakh	11	1	7	6
Basenji	124	90	95	138
Basset Fauve de Bretagne	31	35	13	39
Basset Hound	210	187	122	190
Beagle	613	600	535	630
Black/Tan Coonhound	0	1	0	2
Bloodhound	16	10	13	0
Bluetick Coonhound	0	0	0	4

HOUNDS	2017	2018	2019	2020
Borzoi	36	67	48	53
Cirneco Dell'Etna	0	0	0	5
Dachshund (Long)	69	60	107	72
Dachshund (Min. Long)	345	353	344	301
Dachshund (Smooth)	189	187	156	189
Dachs. (Min. Smooth)	805	781	804	789
Dachshund (Wire)	33	16	29	28
Dachshund (Min. Wire)	46	56	34	42
Dachshund Kaninchen (Smooth)	0	0	0	2
Deerhound	27	47	72	44
Finnish Spitz	4	3	0	7
Foxhound	9	21	26	21
Grand Basset Griffon Vendeen	6	7	26	10
Greyhound	8	32	37	20
Harrier	27	17	4	10
Ibizan Hound	0	2	1	0
Irish Wolfhound	69	42	47	93
Norwegian Elkhound	19	23	48	16
Petit Basset Griffon Vendeen	42	17	28	27
Pharaoh Hound	14	27	26	7
Portuguese Podengo (Small)	18	7	19	25
Port. Podengo (Medium)	0	0	0	0
Port. Podengo (Large)	0	0	0	0
Rhodesian Ridgeback	723	791	654	818
Saluki	57	45	30	57
Sloughi	0	0	1	0
Whippet	749	754	687	904

GROUP 5

WORKING DOGS	2017	2018	2019	2020
Australian Cattle Dog	988	998	899	1006
Australian Kelpie	193	196	186	180
Australian Shepherd	833	1132	1161	1276
Australian Stumpy Tail Cattle Dog	86	48	71	70
Bearded Collie	25	63	53	54

WORKING DOGS	2017	2018	2019	2020
Beauceron (Berger de Beauce)	0	0	0	1
Belgian Shep. (Groen)	70	34	86	62
Belgian Shep. (Laek)	6	1	10	11
Belgian Shep. (Malin)	151	163	199	228
Belgian Shep. (Tervn.)	103	78	36	86
Bergamasco Shep. Dog	2	4	10	9
Border Collie	3037	2458	2855	2825
Bouvier des Flandres	18	19	7	10
Briard	19	55	30	37
Collie (Rough)	321	362	307	307
Collie (Smooth)	33	27	27	38
Dutch Shepherd	0	9	4	6
Finnish Lapphund	151	184	212	191
German Shepherd Dog	3296	3107	2768	3279
German Shepherd Dog (LSC)	706	566	709	682
Icelandic Sheepdog	0	1	1	0
Kuvasz	1	0	0	0
Maremma Sheepdog	162	145	166	196
Norwegian Buhund	7	7	0	1
Old English Sheepdog	65	64	80	94
Polish Lowland Sheepdog	14	0	10	0
Puli	21	37	44	13
Pumi	1	0	8	0
Pyrenean Sheepdog Longhaired	0	0	1	5
Shetland Sheepdog	624	561	566	566
Swedish Vallhund	41	28	26	69
Welsh Corgi (Cardigan)	106	132	123	106
Welsh Corgi (Pembroke)	493	435	578	659
White Swiss Shepherd Dog	115	189	267	255

GROUP 6

UTILITY DOGS	2017	2018	2019	2020
Akita	104	91	55	96
Akita (Japanese)	78	64	121	68
Alaskan Malamute	166	188	169	183

UTILITY DOGS	2017	2018	2019	2020
Anatolian Shepherd Dog	43	23	27	24
Bernese Mountain Dog	481	416	575	476
Boxer	1048	1081	938	1001
Bullmastiff	384	388	270	382
Cane Corso	291	239	240	371
Central Asian Shepherd Dog	15	25	14	7
Dobermann	686	622	502	582
Dogue de Bordeaux	355	343	243	275
Estrela Mountain Dog	1	0	7	1
German Pinscher	54	60	24	60
Kangal Shepherd Dog	0	3	20	22
Landseer ECT	0	1	0	3
Leonberger	33	26	34	5
Mastiff	54	99	90	81
Neapolitan Mastiff	81	110	60	51
Newfoundland	174	190	180	165
Portugese Water Dog	64	94	79	106
Pyrenean Mountain Dog	19	43	13	40
Rottweiler	1712	1767	1780	1852
Russian Black Terrier	46	31	30	28
Samoyed	296	395	324	440
Schnauzer	154	167	131	107
Schnauzer (Miniature)	1678	1554	1594	1638
Schnauzer (Giant)	26	12	32	8
Shiba Inu	184	139	158	173
Siberian Husky	553	434	400	440
St Bernard	195	221	124	174
Tibetan Mastiff	36	78	78	30
Tornjak	0	0	0	7
Yakutian Laika	0	0	0	15

GROUP 7

NON SPORTING	2017	2018	2019	2020
Boston Terrier	415	465	399	429
British Bulldog	1499	1381	1134	810
Chow Chow	238	242	241	247
Dalmatian	640	707	605	658

NON SPORTING	2017	2018	2019	2020
Eurasier	0	0	1	0
French Bulldog	4082	3095	3131	2669
German Spitz (Klein)	8	11	19	2
German Spitz (Mittel)	151	126	86	105
Great Dane	617	597	551	590
Japanese Spitz	241	184	184	366
Karelian Bear Dog	0	0	16	0
Keeshond	94	141	150	126
Llase Apso	107	75	120	138
Peruvian Hairless Dog (Large)	19	18	14	14
Peruvian Hairless Dog (Medium)	0	0	7	6
Peruvian Hairless Dog (Small)	0	0	0	2
Poodle (Standard)	406	423	344	462
Poodle (Miniature)	392	325	387	370
Poodle (Toy)	1168	1093	1131	1259
Schipperke	82	66	77	83
Shar Pei	166	194	143	151
Shih Tzu	345	335	246	294
Tibetan Terrier	51	49	59	49
Xoloitzcuintle (Miniature)	14	3	14	26
Xoloitzcuintle (Intermediate)	1	0	1	1
Xoloitzcuintle (Standard)	15	16	12	29

Not Being Registered in Australia with ANKC

The following are breeds that were being registered with ANKC and have no current recorded registrations. Unless held privately or with other dog associations, these could now be considered to be extinct in Australia.

American Hairless Terrier

Bloodhound

Canadian Eskimo Dog

Caucasian Shepherd Dog

Cesky Terrier

Dachshund Kaninchen (Long)

No Longer Registered in Australia with ANKC

Dachshund Kaninchen (Min. Long)
Dachshund Kaninchen (Min. Smooth)
Dachshund Kaninchen (Min. Wire)
Dachshund Kaninchen (Wire)
Eurasier
Hamiltonstovare
Ibizan Hound
Icelandic Sheepdog
Karelian Bear Dog
Komondor
Kuvasz
Otterhound
Pumi
Pyrenean Mastiff
Sloughi
Swedish Laphund
Tata Shepherd Dog

(Statistics from: AUSTRALIAN NATIONAL KENNEL COUNCIL LIMITED — NATIONAL ANIMAL REGISTRATION ANALYSIS 2010-2020).

ANKC is a 'authorised/registry' organisation . Pet Registers require a breeder to belong to a 'recognised' organisation to advertise or sell.

Animal Rights Extremist's (ARE's) 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 places that breed in a vulnerable situation. This is to ensure responsible numbers are maintained to sufficiently rest bitches and maintain a strong genetic availability.

CAT BREEDS ALREADY AT RISK:

GROUP ONE — Registrations for 2019

BIRMAN	36
EXOTIC	42
MAIN COON	140

NORWEGIAN FOREST	23
PERSIAN	111
RAGDOLL	209
SIBERIAN *	58
TURKISH ANGORA	0
TURKISH VAN	0

* **SIBERIANS** — there are only 16 breeders Australia wide.

GROUP TWO — Registrations for 2019

BALINESE	0
FOREIGN WHITE	4
FOREIGN WHITE VARIANT	0
ORIENTAL	34
ORIENTAL LONGHAIR	0
ORIENTAL VARIANT	0
PETERBALD	0
SIAMESE	93

GROUP THREE — Registrations for 2019

ABYSSINIAN	34
AMERICAN CURL	0
AMERICAN SHORTHAIR	12
AUSTRALIAN MIST	19
BAMBINO	0
BENGAL	181
BOMBAY (AMERICAN)	0
BRITISH SHORTHAIR	0
BURMESE**	127
BURMILLA	0
BURMILLA LONGHAIR	0
CORNISH REX	14
DEVON REX	41
EGYPTIAN MAU	0
ELF	0
JAPANESE BOBTAIL	0

KORAT	7
LAPERM	0
MUNCHKIN	1
RUSSIAN	65
SCOTTISH FOLD	12
SCOTTISH SHORTHAIR	11
SELKIRK REX LONHAIR	5
SELKIRK REX SHORTHAIR	10
SINGAPURA	0
SNOWSHOE	24
SOMALI	7
SPHYNX	50
TOMNKINESE	0

** **BURMESE** bloodlines are very limited with approx. 70+ % inbreeding in some lines.

(Statistics from: NSW CAT FANCIERS ASSOCIATION REGISTRATION ANALYSIS 2014-2020).

YEARLY GRAND TOTALS:

2017: 1753

GROUP 1: 685

GROUP 2: 135

GROUP 3: 933

2018: 1563

GROUP 1: 636

GROUP 2: 121

GROUP 3: 806

2019: 1550

GROUP 1: 619

GROUP 2: 131

GROUP 3: 800

That is a loss of 203 registered CATS in just two years.

EXAMPLES SMALL CAT BREEDERS AND THEIR LIMITATIONS:

If a breeder has:

One Male & Five Females:

You can never keep any offspring, to continue breeding. In five years queens by 'recognised association' rules should be retired. End of that line.

Two males & Four females:

You can keep offspring to put back to male number two

So if each male paired with two females had a litter per year and you were lucky enough to get a breeder out of those litters to put back to the other male. You are over your limit.

Cat Case Study

Due to Local Council 'involvement' in the approval process for a breeder to apply for a permit to maintain a larger genetic breeding pool, this breeder applied to have an additional 8 breeding cats instead of the permitted 10. Due to the drawn out process dealing with Council the costs incurred by this breeder were:

\$7,000 in application fees

\$30,000 for the consultation to do the works

\$35,000 for the driveway and parking area (Council requirement)

The breeder is on over 8,000sqm (but the process works on 4,000sqm)

SO MUCH FOR BEING A HOBBY — OR MAINTAINING the EXISTENCE OF SOME BREEDS OF CATS. These costs will not be re-couped in any short period of time.





Animal Care Australia

Animal Care Australia (ACA) is a national incorporated association lobbying for and advocating for higher welfare outcomes for animals by educating hobbyists and keepers and lobbying governments.

ACA was founded in early 2018 to establish an organisation run solely by volunteers to lobby for real animal welfare based on centuries of expertise keeping and breeding animals. Extreme animal rights and animal liberationist ideologies currently influencing government legislation, regulation and policy are at expense of real animal welfare and hence to the detriment of our animals and pets. ACA provides government with a balancing voice.

By uniting the broad spectrum of animal groups, collectively we offer an experienced, sensible approach to animal welfare. We estimate our foundation ACA clubs currently represent well over 200,000 members.

ACA is in the unique position of lobbying and advocating for all animals within our care. The association represents each of the following major animal groups – dogs, cats, birds, horses, reptiles, farm animals (hobby-farming), small mammals, native mammals and mobile and wildlife

educators.

When lobbying government, ACA prioritises the following:

- ♦ ACA strives for implementation of stronger achievable animal welfare outcomes using and based upon the extensive expertise of our members.
- ♦ ACA prioritises education over regulation as the most effective and economical means of improving animal welfare outcomes nationally.
- ♦ ACA opposes animal rights, an area of much confusion for the general public. We strive to highlight and educate the public on the differences between animal welfare and animal rights.

To this end, ACA has engaged with government on a range of issues throughout Australia. The Appendix that follows outlines some of these matters, including parliamentary inquiries, Ministerial, MP, Department Director meetings, appointments as major stakeholders, and numerous submissions in NSW and various other jurisdictions nationally.

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.

“Animal welfare by the experts—those who keep, care for and breed animals”

“Support Responsible breeding!”



“Remove unethical breeders”

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