



All Correspondence:
Australian Pet Welfare Foundation
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www.petwelfare.org.au

The Australian Pet Welfare Foundation is a non-profit, tax-exempt Foundation

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The (APWF) serves as a pivotal research organisation and advocate for pet welfare across Australia. As a non-profit entity, APWF is dedicated to pioneering evidence-based strategies aimed at reducing cat and dog intake and euthanasia at local government pounds and animal welfare shelters.

Under the guidance of Dr. Jacque Rand, Emeritus Professor of Companion Animal Health at The University of Queensland and a registered specialist in small animal internal medicine, APWF has significantly contributed to shelter research. Over the past 16 years, Dr. Rand has led numerous studies, including collaborations with the RSPCA, the Animal Welfare League, and various local government bodies. Her tenure at UQ included teaching Urban Animal Management, and she has co-authored 21 peer-reviewed articles focused on this subject, particularly addressing the management of semi-owned and unowned cats.

This submission is in response to the South Australia Dog and Cat Management (Breeder Reforms) Act. A survey has also been completed, but comments are limited to 255 characters. Therefore, we are submitting these comments by way of written form.

Breeder reform – banning puppy farms

Breeders are currently required to register on the Dogs and Cats Online database and be issued with a breeder registration number. Do you think the changes proposed in the draft Bill requiring people to obtain a conditional license to breed dogs and cats are appropriate?

Strongly agree

Australian Pet Welfare Foundation (APWF), supports the concept of conditional breeder licenses for a three-year period, including random inspections throughout this time, particularly for large-scale operations. We understand that the Board will determine the information requirements, develop the application form, and set the license fees. Applicants for a breeder's license must provide information specified by the Board or regulations, such as details about their breeding property, facilities, animal management and breeding experience, and plans for animal care, socialization, exercise, and breeding. This arrangement requires the community to trust the Board's decisions. While we agree with the principle of licensing, it would have been beneficial to have all relevant information available during the consultation process.

However, a separate scheme for rescue groups and other not-for-profit organizations, distinct from the breeder permit system, should be developed in partnership with these organizations to encourage working towards the same goal, transparency and voluntary compliance. The Guidelines for Breeding and Trading Companion Animals 2017 are currently inadequate, as they impose limited training requirements for operating these businesses, inadvertently encouraging unregulated backyard breeders. The reform notes that larger-scale operations will need to complete higher levels of training. Although Certificates in Animal Care 1 & 2 are available, they remain insufficient for ensuring compliance. The guidelines need to be amended to mandate that the facility manager and all staff "must be" instead of "should be" adequately and appropriately trained in companion animal health, welfare, and management. We also support mandatory industry-approved training specifically designed for application of this license, outlining potential liabilities, offences, training, inspections and all other matters.



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The following elements are proposed to form part of the breeder licensing application process. Do you think the following elements of the application are appropriate?

Strongly agree

The requirement for a “demonstrated interest” in dog and cat welfare, and the management of these animals, for individuals serving on the Board at a State level should be revised to state “must be an expert,” with credentials and/or relevant experience to support this. Board members appointed by the Minister must encompass all relevant industries, including research. Current research pertaining to companion animal management and the associated animal care industries can significantly influence best practices and policies. It is recommended by APWF that the Board considers examples of animal management practices from other states to determine what is effective and what is not, during this reform process for breeders and licensing. It is our preference all breeders within the permit system must be inspected, regardless of under or over 5 fertile females, to ensure compliance with mandatory training a must. Any prior convictions relating directly to a breeder permit license, must make them ineligible for the permit, with no right of appeal.

The APWF strongly agrees with the standard conditions proposed to be attached to a breeder license, except for a female dog, which can have a maximum of 5 litters, and a female cat 8 litters, which we strongly disagree with. Allowing a maximum of 50 fertile females per breeding facility is irresponsible. Permitting breeding facilities to produce five litters per female dog and eight litters per female cat is unacceptable given the current issues of dog and cat overpopulation across Australia and the resulting overcrowding in shelters and rescues. These breeding practices are rapidly losing social license to operate, as public opinion increasingly opposes such businesses.

As part of the licensing conditions, will there be a rehoming clause for the dogs and cats once they have reached the end of their breeding usefulness? Who will be responsible for rehoming these animals? Will it be a shelter, or will these establishments be allowed to sell these dogs and cats as entire animals? Will these animals need to be desexed as part of their permit conditions, when they are no longer useful? If there is no requirement for desexing after their five and eight litters, the potential new owner may then breed them again, generating additional profit but at the animals' detriment, or will animals be euthanised once they have served their purpose?

The demand for designer dogs has seen breeding increase dramatically over the last few years, with people paying extreme prices for crossbred companion dogs. Easy access for purchasing online became a very lucrative business for the puppy farm industry. Dogs with hereditary issues, such as French bulldogs with breathing difficulties, have been on the increase, costing a considerable amount of money to purchase, in veterinary costs as the animals age, and impacting the welfare of these pets.

4. Increasing penalties for dog attacks

Do you support the proposed increases in penalties for dog attack offences?

Disagree

There is an urgent necessity to acknowledge that the fines and costs imposed on individuals found guilty of dog attacks in Magistrates Courts often fail to induce behavioural change. Currently, there are no alternative non-financial mechanisms available for courts to mandate rehabilitation or compulsory counselling for offenders in the most serious cases of dog attacks. In addressing the



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issue of dangerous dogs, it is imperative to shift focus from merely increasing penalties to scrutinising the criteria for ownership eligibility. This includes evaluating an individual's past history and credibility concerning their compliance with dangerous dog orders, and assessing whether the owner can adhere to the imposed conditions.

Furthermore, proactive programs are essential to communicate effectively with owners of dogs found at large. Such programs should involve practical measures such as inspecting fences and engaging in conversation with owners about preventive strategies to ensure that dogs remain contained within their properties. These proactive steps can help mitigate the risk of future incidents by addressing potential issues at an early stage.

It is also crucial to recognise that while no dog attack is acceptable, there is a significant difference in severity between a declared dangerous dog attacking at large, and a dog with no prior history committing a minor attack when it accidentally escapes its property. These offences differ greatly in their gravity and should not be compared equivalently. Thus, a more refined approach is required, one that considers the context and severity of each case, alongside the implementation of preventive and rehabilitative measures to effectively address the root causes of a dog behaviour ([APWF 2023 Qld-Strong-dog-laws-safer-communities-consultation-APWF-submission-final.pdf](#) (petwelfare.org.au)).

Please provide any other comments you may have on the Dog and Cat Management (Breeder Reforms) Amendment Bill 2024.

The requirement for all dogs to be registered, along with the removal of the business component, necessitates consideration for rescue groups and carers managing overflow from council pounds and shelters. Businesses involving dogs need a clear definition. Given the lack of trust between rescue groups and animal management officers, assurances against retribution for registering are essential. Short-term carers need honesty and transparency; otherwise, dogs may be hidden, unregistered, and unreported when given away, evading oversight. Therefore, a specific scheme for rescue groups and carers is vital, along with a consultation process to engage them and ensure functionality without financial burden.

The Dog and Cat Board website currently lacks proactive programs to reduce stray and semi-owned cats in communities. There are no resources for community outreach, keeping pets at home, or strategies to change human behaviors with councils across South Australia. Additionally, there is no effective statewide cat management strategy to reduce stray/ semi- owned cats. SA shelters are often overwhelmed with cats with very little funding provided, leaving many on the streets supported only by cat carers and rescue groups at their personal expense. Effective cat management requires partnerships between councils, community, organizations, and other stakeholders. Operating in silos impedes progress in addressing stray cats and overpopulation issues. Funding for proactive, targeted free cat desexing is an immediate necessity, especially in disadvantaged areas with high intake rates and frequent complaints to councils (Cotterell 2024 <https://www.mdpi.com/2076-2615/14/11/1615>).

For wandering or nuisance dogs, orders should be issued only after a discussion between an authorized officer and the dog owner, documenting agreed outcomes for rectifying the situation, these should not include destruction orders. If no conversation occurs, an order should not be issued. Information on dogs with existing declarations from other states should be shared via a potential national database to maintain community safety and enforcement of these dogs across Australia.



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Best wishes,

Jacquie

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Diplomate, American College of Veterinary Internal Medicine

Executive Director & Chief Scientist
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