

From: [REDACTED]
To: [Puppy Farming](#)
Subject: Suggestions and feedback on stop puppy farming paper
Date: Friday, 27 July 2018 12:24:21 PM

I have read your 'stop puppy farming' consultation paper and submitted the online survey. However, I was hoping there would be a space for additional comments but there wasn't so I'm sending you my additional comments and suggestions here:

- One of the questions was whether I support the transition of pet shops into adoption centres. I responded 'strongly disagree' to this and I wanted to clarify what I mean. I support the change if that is all we can do but I think a more positive change would be to stop pet shops selling pets at all. I don't believe that pet shop staff have the experience to assess whether a prospective owner is a good match for that particular dog - whereas shelter staff are usually much more experienced and trained in making the right match for dog and owner. Pet shop staff are often young, inexperienced people who work there as they have a 'love for animals'. However, we should not make the dangerous decision of assuming that love for animals equates to experience and making sure they make the right choices on behalf of the animal. The consequence of this would be that a lot of dogs end up back in shelters and up for rehoming again. My experience from working in the UK, is that pet shops, if managed well, can still make a decent profit from pet supplies (just look at City Farmers!).
- On the above note, I believe pet shops could still have a partnership with shelters and advertise dogs that are available but that prospective owners would need to then visit the shelter to meet the dog. This would also show a level of commitment from the owner, rather than risk them making a spontaneous purchase.
- In addition, I have experienced first hand, pet shops that are closed on Sundays and public holidays and nobody is there to look after the dogs - they are left without human contact and sit with their own faeces for two days. This would never happen at a shelter.
- I believe the majority of the cost for the central registration and enforcement should come from the breeders themselves. I believe they make a large amount of profit from breeding puppies and the right and justified thing would be that they pay to ensure this works, not the general public.
- Will the 'dog breeder number' that is used when breeders advertise puppies be accessible online so potential buyers can check immediately if they are a registered breeder?
- What about breeders who sell puppies at markets? I have heard this happens which I find abhorrent. Would they need to display prominently what their registered breeder number is?
- The minimum requirements for husbandry, accommodation, diet, care and socialisation should be set out by an established board of a mix of veterinary surgeons, vet nurses and shelter management staff. This is the crucial part to

ensuring the right outcome of this. Those same people should carry out inspections, perhaps with a local government ranger.

- Will there be a central phone number and online reporting facility for people who have discovered non-registered breeders? Will this be anonymous to encourage reporting? What are the consequences of breeders not registering? It needs to be pretty heavy for them to be discouraged from doing it.
- If you are sticking with the idea that pet shops are transitioned into adoption centres, then clear rules need to be laid out and training set up for staff (perhaps run by the shelters themselves) of these pet shops to ensure they match the dogs to owners properly. It may even warrant the shelter doing 'spot inspections' 6 weeks after adoption to check on the dog's new home. Obviously this means using up more resources of the shelter but could be something volunteers are willing to do.
- Currently, when a dog is re-homed from a shelter, ownership of that dog always remains with the shelter so if any cruelty is suspected, they can legally have the dog back. In the new proposals, who will be the legal owner of the dog - the shelter that they are working with? Or the pet shop? I believe it should still lay with the shelter.
- I think that registering the breeder on the microchip is a great idea!
- How often are inspections of breeders planned to be carried out? Will these be 'spot' inspections without prior warning? My view is twice a year for every registered breeder and without warning.
- If the proposals determine that existing adult dogs do not need to be sterilised, you need to think of what would happen if there was an accidental mating. Would you ask them to report it and then have the litter aborted? Would they be fined? Would you let them continue to deliver the puppies with some kind of exemption?
- Shelters should not have to pay to be accredited - this cost should be carried by the breeders themselves. Shelters do not turn a profit - breeders do.
- Finally, but importantly, alot of people currently purchase puppies from interstate. I think loud, frightening airline travel is a cruel thing to put a puppy through but I have also seen this practice spread parvovirus from the eastern states to here. Can we include anything in the proposals that will help prevent people buying puppies from other states? There is no way of knowing what breeding conditions these puppies are from and if people can't get puppies here so easily, the trafficking of puppies from 'bad' breeders over east will only increase. Thereby, we are only shifting the weight of puppy farming from our state to others. It would be great if we could put a large levy on people importing puppies from other states to discourage this.

I think that is all - well done as I think this is a great thing that has been needed for a very long time.

Thank you

