

COMPANION ANIMALS AMENDMENT (PUPPY FARMS) BILL 2024
20 MAJOR POINTS OF CONCERN FOR DOGS NSW MEMBERS

What is proposed:

1. Numbers of dogs & requirements:
 - Microbreeder allowed 2 breeding bitches or queens, including animals in loving guardian homes
 - Recreational Breeder allowed 3 to 10 breeding females if a member of an applicable organisation(61ZX)
 - Inequity of excluding working dogs from companion animal definition and exemptions for other breeds (inconsistent with welfare issue) (61H)
 - Maximum 5 litters for any breeding bitch, then MUST be desexed
 - Total absence of supporting Regulations and some definitions
 - Breeding males MUST be desexed at 6 years old
 - 1 staff member onsite 24/7 for each 10 animals kept at the registered premises, each puppy in a litter is counted the same as an adult dog

2. Council:
 - Classification of Dog & Cat breeders requiring Local Council Approval as Companion Animal Business/Companion Animal Breeding Business (61M)
 - Annual inspection by Local Council (61M Div 2)
 - Local Council has absolute discretion to impose terms and conditions to any registration of a Companion Animal Business
 - Local Council has absolute discretion to refuse to renew any registration of a Companion Animal Business & Breeding Businesses (61P)
 - It is unclear where a recreational breeder fits into many clauses (& definition of companion animal business)
 - Companion Animal Businesses & Breeding Businesses would be in conflict with zoning and Development Control Plans with most Councils
 - Any Local Council officer to have greater powers of entry than NSW Police

3. Veterinary & mandatory requirements:
 - Unregistered breeders or breeders unsuitable in a Council Officer's opinion could have their breeding dogs or cats seized (ie All animals)(69M)
 - Mandatory sign-off by a Vet on a Health Management Plan (61ZP)
 - Mandatory health check within 8 weeks of delivering a litter (61ZK)
 - Mandatory annual health check (61ZK)
 - Vet – certification dog suitable for breeding (61ZL)
 - Must not breed from a female if a previous litter has identified a heritable defect (61ZM)
 - 2nd degree mating prohibited (61ZM)
 - Lack of oversight of enforcement officers/bodies and the activities they perform – some enforcement officers are companion animal breeders

4. Relevant to DogsNSW as an applicable organisation:
 - Extreme compliance and registration requirements placed on Applicable Organisations, for what benefit & to whom?
 - AO member data shared on a Public website, serious concerns on Privacy breaches

5. **Other issues of concern:**

6. Overlap of Animal Welfare under POCTAA 1979 into CAA 1998
7. Overlap of record keeping and husbandry matters with existing POCTAA (ie Health Management Plan)
8. Duplication of Pet Registry processes
9. Annual Licencing – fee to fund the cost of implementation of amendments to CAA
10. All dog and cat advertisements MUST quote a "Source" number
11. Companion Animal Business allowed between 3 and 10 breeding females
12. No commercial breeders, more than 10 breeding female dogs or cats is NOT permitted at all

13. Breeding females out in guardian homes are included in the breeder's allowed numbers of breeding females
14. POCTAA enforcement officers to enforce CAA legislation **along with Council officers**
15. Puppies and Kittens over 8 weeks old can be deemed to be breeding animals in the calculation of permitted numbers
16. Over-riding/Cancellation of Breeding Contract arrangements retrospectively
17. Bankrupts and/or Directors of Body Corporates that have gone into liquidation cannot be approved for Companion Animal Businesses
18. Pet shops only permitted to sell dogs over 6 months old sourced from a rehoming organisation or approved breeder OR cats over 8 weeks also from a rehoming organisation or approved breeder.
19. Ministerial consent required for approved breeders
20. Ministerial consent required for applicable organisations