

9 March 2016
Mr John Madigan
Animal Management
[REDACTED]
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Research Director
Agriculture and Environment Committee
Parliament House
BRISBANE QLD 4000

Dear Sir/Madam

Animal Management (Protecting Puppies) and Other Legislation Amendment Bill 2016

Thank you for the opportunity to make comment in relation to the *Animal Management (Protecting Puppies) and Other Legislation Amendment Bill 2016* which has been referred to the Agriculture and Environment Committee for consideration. The following comments are provided by the City's administration and due to time constraints have not been referred to Council for due consideration and endorsement:

1. The City supports "in principle", the objective of the proposed amendments to the *Animal Management (Cats and Dogs) Act 2008* in relation to 'puppy farming' within the state.
2. It is acknowledged that the success of the proposed legislation is reliant upon the State Government, RSPCA and local government working collaboratively as well as the development of a comprehensive state wide public awareness campaign. Any compliance and community awareness strategies for this regime must be developed in partnership with local government.

The role of local governments in the enforcement of the proposed dog breeder provisions is dependent upon their involvement in the development of a compliance strategy. Whilst the impact upon local government is not known at this time, it should not place additional regulatory burden upon local government without the State Government providing funding to the cover local government costs.

3. The development and delivery of a State-wide public awareness campaign should be funded entirely by the State Government. The campaign will need to focus on members of the public being responsible pet owners and for them to drive the requirements of any advertisement of a dog for sale must have a registered breeder number included. Just as home owners now look for licenced builders, prospective dog owners should look for licenced breeders.
4. The dog breeder registration database should be coordinated and managed at a state-wide level. The administration, resourcing and cost of the Dog Breeder Registration database is managed by the State Government. That is, dog breeders approach the State Government to apply to become a registered breeder. Local government will have no role in the administration of licensing dog breeders.
5. Where an organisation is to be given approval as an 'approved entity' and therefore exempts their members from the proposed dog breeder registration process, it is critical that those approved entities be bound to share their membership information

as required by Section 43W of the Bill. This will ensure the objectives of the Bill are achieved and the compliance strategy is effective.

6. The proposed legislation should recognise dog breeders who hold a current permit under a local government local law. It is understood that along with the City of Gold Coast, there are other local governments in the state who have introduced local law requirements to regulate the breeding of dogs. In 2008, the City of Gold Coast (City) was requested to participate in a pilot project following the introduction of the *Animal Management (Cats and Dogs) Act 2008*. The aim of the project was to develop a code of practice for breeders of cats and dogs and develop local law requirements that compelled residents to obtain a permit should they intend to keep, or currently keep, dogs and cats for breeding purposes.

The permit regime introduced by the City goes beyond the regulatory controls contemplated by the Bill since it places a number of conditions upon permit holders which cover both animal management and animal welfare issues. For that reason it is requested that the proposed legislation recognise the animal breeder permit regime introduced by the City and allow the relevant local law requirements (animal breeder requirements) to continue in parallel with the proposed legislation. To that end the proposed legislation could require the City to provide breeder permit information to the State Government so that it can be included on the State database.

7. The requirement of ordinary citizens with a 'one off' litter to obtain breeder registration and microchipping may cause further issues associated with indiscriminate disposal, i.e., dumping of pups and dogs.
8. Third party sales could provide unscrupulous breeders with an opportunity to evade the need to register as a breeder. From reviewing the proposed legislation it appears that a primary producer who receives a puppy from another primary producer could supply the puppy to a third party since they do not require to comply with the breeder registration requirements.

Should you wish to discuss the matter further, **please do not hesitate to contact the City's Acting Coordinator Animal Management Mr John Madigan** [REDACTED]

Yours sincerely

John Madigan
Acting Coordinator Animal Management
For The Chief Executive Officer