

Addressing Legislation Concerns

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Abstract

In 2006, the delegates at the first National Summit included in their resolutions the need for legislation for cats and dogs to be desexed and microchipped prior to sale or exchange.

There has been some progress with microchipping prior to sale or transfer and a number of governments have introduced, or are developing, legislation which encourages or requires desexing, particularly of cats.

However there are a number of concerns continually being raised by some groups regarding desexing legislation.

This paper aims to address these concerns.

Background

The need for legislation for cats and dogs to be desexed and microchipped prior to sale or transfer was included in the resolutions of the 2006 Summit. Since then, there has been progress towards these goals in various states and individual cities and shires. However significant differences exist between the positions of the Australian Veterinary Association (AVA), Australian Companion Animal Council (ACAC), the Pet Industry Advisory Service (PIAS) and the Pet Industry Association of Australia (PIAA) and organisations involved in the care and management of animals in pounds and shelters (RSPCA Australia, AWLQ, and most other shelters and rescue groups around Australia) on the causes of, and solutions to, the unwanted cat and dog population in pounds and shelters.

Data is necessary to determine causes and possible solutions. The AVA (a professional body for the protection of the interests of vets) and Pet Information and Advisory Service (a pet industry body for the protection and interests of the pet industry) have been using limited data from external research studies, which have been repeated by ACAC, PIAA, and other groups who have no direct knowledge of shelters. As well as analysing these research studies, AWLQ has been systematically identifying and gathering data on the causes of unwanted animals for a large city in order to have complete data for a whole community of people, cats and dogs.

AWLQ has also been facilitating ongoing discussions and negotiations with all stakeholders in Queensland through a Stakeholder Coalition since 2004. These includes the main breeder organisations in Queensland Dogs Qld, Queensland Feline Association, Queensland Independent Cat Council, Council of Federated Cat Clubs of Qld, Australian Veterinary Association Qld Branch, RSPCA Qld, Little Paws Rescue, Gold Coast City Council, the Queensland Department of Local Government now Dept of Infrastructure and Planning, Pet Industry Assoc of Australia, Wildcare Australia, and Wildlife Preservation Society Qld. Stakeholder input has led to a continual refinement of strategies that support the interests of all groups, including cats and dogs. Unfortunately due to our state based systems of government, distance and time constraints, representatives of stakeholders in other states have been involved in meetings elsewhere. There has resulted in a lack of cohesion for a national approach.

The differences in positions largely relate to owners being required to desex their cats and dogs. This paper sets out to address the arguments that have been put forward against owners being required to desex their cats and dogs, and offers an alternative that has resulted from long term negotiations over 8 years with breeders, pet shops, government, wildlife groups, vets and welfare groups.

Responses to Concerns re Legislation requiring owners to desex their pets

1. *The majority of cats in pounds and shelters are unowned, and therefore would not be affected by desexing legislation.*

Evidence in a whole-of-city population, the majority of animals in pounds and shelters are owned, and a considerable proportion of these are undesexed on entry to a pound or shelter.

The AVA policy states: "With cats, the majority of those ending up at the pound are not owned, being either stray or feral animals." This generalisation is based on "a Victorian university study" which "found that 80% of cats entering three major shelters had no owners or were semi-owned."(p.2)

It is not valid to generalise that the majority of cats ending up at the pound are stray or feral, or that all "stray" cats in pounds and shelters are "unowned", based on this Victorian study.

Firstly, these three shelters are not necessarily representative of other places in Australia. The intake of cats and dogs into pounds and shelters is influenced by a wide range of factors, including, for example, pound/shelter policy on acceptance of strays and surrenders, public accessibility, and public confidence in a pound or shelter management's commitment to rehoming. There are many other pounds and shelters and rescue groups in Melbourne, who may have different ratios of strays and surrenders based on their policies.

Secondly, the Victorian study is not representative of a whole city. The ratio of stray cats to surrendered cats (80:20) is certainly not representative of the whole of Gold Coast City, where 56% of cats were stray and 40% were surrendered by their owners in 2009/10, with 4% born at AWLQ¹. 8% of stray cats were reclaimed by their owners, and 40% of stray cats were desexed which meant that at least 60% of cats were definitely owned. This is without taking into consideration the following evidence that suggests that the majority of strays are likely also to be owned.

Thirdly, the use of the research definition of a stray as "unowned" in the Monash University study on which this AVA generalisation is based, is different from the use of the term "stray" in pounds and shelters. The Victorian researchers have defined a "stray" cat as "a cat that lives in proximity to humans and utilises resources associated with human environments, but who is not intentionally supported by an identified person".²

A "stray" cat in a pound or shelter, however, is any cat impounded due to wandering at large. Ownership is transferred to the Council only if the owner does not come to collect a stray animal within a number of days that varies from Council to Council. This can impact on the capacity of an owner to claim their animals. It certainly does not prove that the animal was not owned. It only proves the animal has not been claimed by an owner.

In Gold Coast City, most "stray" dogs are owned. In the last 5 years, 70 -78% of the intake of stray and surrendered dogs each year have been strays, and 70% of the strays are reclaimed by their owners. The dog data shows a stray animal does not mean an unowned one. Just as it is incorrect to assume a stray dog is unowned, it is equally incorrect to assume that a stray cat is unowned.

Fourthly, there are many reasons why cats may be owned but have a lower reclaim rate in pounds. In most cities and shires in Queensland, cats have not been required to be registered or microchipped. Because stray cats are usually unidentified (87 % of incoming stray cats in Gold Coast

¹ AWLQ Statistics <http://www.awlqld.com.au/strategies/animal-rescue-gld-statistics/>

² Marston, L., Bennett, P., and Touhstai, S., (2006) Cat Admissions to Melbourne Shelters: A report to the Bureau of Animal Welfare, December 2006. Melbourne: Animal Welfare Science Centre, Monash University p.7.

City were not identified in 2007/8), so cat owners can rarely be contacted and consequently only 5-10% are reclaimed by their owners annually. Even in Victoria where cats have been required to be registered since 1996, and microchipped, if sold from a breeder, pet shop or shelter since 2005, the REARK Survey in 2006 in Victoria reported that 88% of dogs owners said their dog had identification; but only 65% of cat owners.³

Cat owners have been more “casual” with cat containment than dog owners, partly because of the independence of cats, and particularly due to the difficulty of containing cats in suburban yards with traditional fences. While more recently people are being educated to keep their cats indoors or with a backyard enclosure or cat safe fence, and new inventions are becoming available to make keeping cats confined in their yards more feasible, there is still perceptions by many that keeping a cat inside is too hard, or that an enclosure or cat safe fencing is too expensive, or that cats need to experience the outdoors, even their freedom to explore outside the yard and come back when they are ready.

Many cat owners fail to visit a pound to look for their cat because they assume it is wandering and will come home eventually. US research by Lord et al. confirms this, concluding that: “It is likely that animal agencies play such a small role in recovery of lost cats because owners of lost cats do not contact them as quickly or as frequently as do owners of lost dogs.”⁴ The median time for a cat to be recovered was 5 days, and 66% of the 73 cats recovered returned home on their own.⁵

Even when a cat is identified, and the owners contacted, some owners refuse to pay the impound fee to get their cat out of the pound. This is more common with cat owners than dog owners, possibly because cats are often more independent and detached from their owners than dogs, and are easily replaceable for little or no money.

The high proportion of stray cats that are highly sociable with humans is another strong indicator that “stray” cats are owned. Unowned cats who have not been kept by humans will not tolerate human contact. In the 2006 Victorian study, “the majority of public (68.58%) and AMO (72.18%) admitted strays were tolerant of, or actively sociable with, humans.”⁶ i.e. the upper levels of the sociability scale. The majority of cats admitted as “strays” in Gold Coast City also fit this category. It is more reasonable to assume that these cats are owned than unowned.

Few animals in urban areas are feral. In Gold Coast City, less than 2% of all cats that enter the pound and shelter are wild and unhandleable. While this may vary in different communities, in urban centres, the majority of unwanted animals are animals that have been owned.

It is also incorrect to state that mandatory desexing will not have any effect on stray or feral cats and dogs. Wandering owned animals become stray animals. Stray animals then continue to breed and produce animals who are unsocialised to humans.

The origin of colonies of unowned cats and feral cats can be traced back to human failure to desex, identify and contain cats brought to Australia. Currently owned litters are still sold undesexed through breeders and pet shops or given away free due to the oversupply. Every owned undesexed cat who wanders, even for short periods, has the potential to breed from 4 months of age, and contribute to the colony or unowned cat population. Female cats are on heat continuously and their breeding rate of several kittens 2-3 times a year is prolific so that it is reasonable to assume that the

³ Heady, B. (2006) *Socially Responsible Pet Ownership in Australia: A Decade of Progress*. Melbourne: University of Melbourne p.12.

⁴ Lord, L., Wittum, T., Ferketich, A., Funk, J., Rajala-Schultz, P., (2007) “Search and identification methods that owners use to find a lost cat”, *JAVMA* Vol 230, No. 2, Jan 15, p.219.

⁵ Lord, L., Wittum, T., Ferketich, A., Funk, J., Rajala-Schultz, P., (2007) “Search and identification methods that owners use to find a lost cat”, *JAVMA* Vol 230, No. 2, Jan 15, p.218.

⁶ Marston, L., Bennett, P., and Touhstai, S., (2006) *Cat Admissions to Melbourne Shelters: A report to the Bureau of Animal Welfare*, December 2006. Melbourne: Animal Welfare Science Centre, Monash University p.10.

undesexed roaming owned cats will contribute to this colony population in cities. Undesexed rural and farm cats will also add to the feral cat population.

“The domestic and feral cat populations are not separate or discrete populations. There is a flow of individual cats in both directions with almost certainly a much larger number of domestic cats entering the wild than the reverse. Obviously if all domestic cats capable of straying to the wild were desexed, these animals would be unable to establish or significantly help to maintain a viable feral population if they so strayed.”⁷

A second indirect effect of breeder permits requiring desexing of kittens prior to sale is that there will be not only be fewer wandering unowned cats, but more homes available to take in, care for, and desex unowned animals.

It is therefore important to re-examine the assumptions that the majority of cats in pounds and shelters are unowned or feral, and that any mandatory desexing would only impact on owned animals, before using it as evidence to influence policy.

2. *The majority of owned animals are already desexed and therefore the legislation is unnecessary.*

Data on the proportion of owned animals who are desexed need to be analysed carefully. For example, in the NSW Pound data for 2009/10, 187 649 of the 192 003 cats with cat registration on the NSW register are desexed i.e. 98% of cats on the NSW pet register whose owners have registered them⁸. However as a proportion of the total 441 854 owned cats identified on the NSW Pet Register in 2009/10, only 42% are desexed. As a proportion of the estimated total number of pet cats in NSW⁹ i.e. 724 000 cats, 187 649 represents only 26% of owned cats.

The Queensland Household Survey 2008 indicated that 93.5% of households with a cat over 3 months of age had at least one cat that was desexed. However “the responses do not allow for the inference that all cats three months or older in a household were desexed”¹⁰. Also, “given the sample size used in the Qld Household Survey, the relatively low occurrence of implementation of cat administrative measures in conjunction with the relatively low occurrence of households with cats did not produce sufficient numbers to generate robust estimates and enable clear discrimination between regions”¹¹.

Regardless of this data, there are still too many abandoned litters of kittens that owners cannot find homes coming in to shelters and rescue groups in kitten breeding season which extends for 9 months of the year in northern Australia. Despite strong desexing programs for the past 8 years in Gold Coast City, 51% of feline intake were kittens in 2009/10.

⁷ Nattras, Ric “A model for cat control” Urban Animal Management Conference Proceedings 1993 P.4

⁸Division of Local Government Department of Premier and Cabinet (July 2011). Analysis of Council Data Collection System for Seizures of Cats and Dogs 2005/2006 to 2009/2010.
http://www.dlg.nsw.gov.au/dlg/dlghome/documents/Information/Pound_Data_Report_-_2005_06_-_2009_10.pdf

⁹ ACAC. Australians and their Pets: The Facts. 2007 Pp. 4, 5.

¹⁰ Qld Dept of Local Government, Sport & Recreation Nov 2008. Queensland Household Survey Summary Report P.40. <http://www.oesr.qld.gov.au>

¹¹ Qld Dept of Local Government, Sport & Recreation Nov 2008. Queensland Household Survey Summary Report P.6. <http://www.oesr.qld.gov.au>

3. *Successful compliance would depend on universal registration and permanent identification, which has already proven to be extremely difficult. The AVA supports animals being desexed before being homed from pounds and shelters as this is an easily achievable task.*¹²

There has been strong support for identification of animals by the AVA and pet industry, despite acknowledgement that it is “extremely difficult” to achieve universally. As with any laws, it is not always easy to achieve complete compliance. However this is not an excuse for not implementing legislation. The AVA has invested funds into the Pet Pep education program in primary schools for the past 20 years which has not prevented hundreds of thousands of healthy and treatable cats and dogs being killed, yet it is still supported. Many strategies are needed to bring about community change and whilst, education is definitely one, legislation, as confirmed by the support of compulsory identification, is another.

Cat and dog registration and microchipping have been compulsory, for owners, for many years in NSW and have not had universal uptake, or made a rapid reduction in unwanted companion animals, particularly for cats. This indicates that rather than leave a gap for animals to be untraceable, the responsibility for permanent identification should be with the breeder before the animals go to the new owners. If the microchipping links each animal sold or given away to the breeder, it assists new owners with follow up, should they need any information or support with caring for the animals. It is also likely to increase responsibility for registration, since Councils usually offer discounted registration for desexed animals. Therefore there will be less delay, or avoidance, to register the animal. To ensure the desexing of kittens before breeding age, breeders should also take responsibility for desexing kittens. One of the reasons why mandatory desexing in other countries has not worked is that it has been required by owners at, or after, the time when registration is due, and some owners avoid registration to avoid both the cost of the desexing and any higher registration fee for an undesexed animal. While there is still some controversy over the impacts of early age desexing on pups, research has shown no short or long term disadvantages, and many positive benefits for desexing kittens from 8-12 weeks of age. Transferring responsibility for desexing kittens to breeders, who can then incorporate the costs into the sale of the animal, overcomes the delays that occur with owners when cats do produce unplanned litters. 40 – 60% of owners who surrender cats in Gold Coast City indicate that their reason for not desexing is either not getting around to it, or cost¹³.

4. *It is unlikely that the target needed to control population growth would be achieved by compulsory desexing. Up to 90 per cent of breeding animals must be desexed to halt population increases.*

If all breeders desex their kittens prior to sale this will be a step toward this 90% of all breeding animals. Not only will the owned cats be desexed but, with Australia’ laissez faire attitude to cats (and sometimes dogs) escaping from the yard, this will also prevent any wandering, or abandoned, cat (or dog) being able to contribute to the free-roaming cat population by breeding whilst wandering.

5. *Mandatory desexing laws have not been shown to be effective in reducing the number of unwanted companion animals. It is important we don’t waste time and money on things that don’t work. Mandatory desexing laws were introduced into the Australian Capital Territory in 2001. It did not have a discernable effect on the numbers of dogs and cats euthanized. There is no reason to think that introducing it anywhere else will have any effect either. In fact in some jurisdictions in the US where it was implemented, mandatory desexing is being phased out.*¹⁴

¹² Lawrie, M. “Mandatory desexing arguments can be tough to win” in The Veterinarian April 2010 p.7

¹³ AWLQ Statistics 2009/10 <http://www.awlqld.com.au/strategies/animal-rescue-qld-statistics/>

¹⁴ Lawrie, M. “Mandatory desexing arguments can be tough to win” in The Veterinarian April 2010 p.7

Legislation is not a quick fix, just as education is not. It is a complex process of consultation to negotiate fair and ethical responses to problems. It requires persistence to review and adjust some elements of the legislation that may not be working, and to address the implementation strategies.

For example, desexing legislation in Australia has not been targeted at the source i.e. breeders. It has also not always been well-resourced by requiring a user-pays system, or had sufficient effective promotion, implementation processes, or support structures.

In the USA, “the definition of ‘mandatory’ varies greatly across communities. In some localities, a citation may be issued for any animal over the age of 4 months if unaltered, while in other communities a citation results only when another animal control offence has been committed or if more than one unspayed female lives in the household¹⁵.” It is therefore “imprudent to generalise about the effects of Mandatory Spay Neuter laws.” Similarly, in Australia, variations in legislation, the involvement of stakeholders, the promotion, implementation, and review processes mean that it is impossible to make a blanket statement that mandatory desexing doesn’t work.

Desexing legislation in the ACT applied to both cats and dogs at 6 months of age until 2007 or 2008. Cats can be pregnant by then. Also people who had the animal already in 2001 are exempt – they can keep on breeding and giving away to people so that it will take some years for the legislation to take effect. In approximately 2007, the legislation was adjusted to require cats to be desexed by 3 months unless owners had a permit to keep an entire animal. However, it is difficult to track people with entire animals. It is easier to track people advertising animals for sale. Therefore the new breeder permit system on the Gold Coast City is required for anyone who breeds. People who keep show dogs and may want to breed later, only have to acquire a breeder permit if they choose to breed.

The mandatory desexing legislation in the ACT also did not include compulsory registration or microchipping of cats so there is no data on the number of owned cats, and no method of measuring trends in ownership. While the Act is available and information about the need to desex promoted in brochures and on the home page of the ACT Domestic Animal Service website, there is little proactive promotion, and to the author’s knowledge no prosecutions for breaches of the Act in respect of this clause.¹⁶

The ACT desexing legislation does not have an in-built inspection system to check for standards or compliance. An effective Breeder Permit system requires that breeders have an inspection before being issued with their breeder permit number to demonstrate compliance when advertising, selling or giving away kittens or pups. Non-permitted breeders can be tracked more easily than owners, as breeders need to advertise their animals somewhere whether on local noticeboards, in pet shops, through the internet or newspapers. This means that desexing of kittens can be easily checked.

However it is important to work towards nationally consistent breeder permits and kitten desexing legislation to be effective, so animals cannot be transferred to a different location to avoid responsibility. Sellers also need to be required to only source animals from permitted breeders. Until the cat population is being managed better nationally with only responsible permitted breeders, accidental breeders will need to be supported with desexing subsidies and opportunities to assist with rehoming of kittens, a proactive animal management strategy for Councils, pounds, shelters and rescue groups.

Effectiveness of any legislation requires promotion, and support programs to encourage and help people comply. There appears to be no community vet clinic or regular desexing subsidy scheme for

¹⁵ ASPCA . 2011. Position Statement on Mandatory Spay /Neuter Laws. <http://www.asPCA.org/about-us/policy-positions/mandatory-spay-neuter-laws.aspx>

¹⁶ Aust Veterinary Association Centre for Companion Animals in the Community. 2007. Mandatory Desexing in the ACT – has it worked? Compulsory Desexing in the ACT – Cats.doc P. 12.

owned pets in the ACT to encourage and support residents to comply with the new legislation. Support programs can be a shared arrangement between local veterinarians, animal welfare groups, and state and local government. For example, the Qld Govt contributed \$20 000 for a desexing subsidy program which is being used to desex cats and kittens with the introduction of the Breeder Permit system on the Gold Coast. Ten local vet clinics have joined in to assist by accepting lower fees for desexing for people with financial difficulties. AWLQ has contributed a Community Vet Clinic, which provides ongoing subsidised rates and low NDN rates, desexing 16 cats and dogs a day, 5 days a week. AWLQ also coordinates the National Desexing Network for pension/ concession card holders, the issuing of Gold Coast City desexing subsidies, and annual Desexing Month promotions. Gold Coast City Council has helped financially with some of these desexing programs.

A Breeder Permit system with a user-pays cost for inspection provides motivation for the 40% of people who have not gotten around to desexing their cats yet, to get their adult animals and kittens desexed, to avoid paying the permit fee or a fine, provided they are aware of , and are offered, support. A Breeder Contact program managed by AWLQ volunteers has enabled people to get their animals desexed and avoid enforcement requirements by local government officers. Breeders advertising puppies and kittens for sale are contacted to offer desexing support, to inform them of the requirement for a permit, and the reasons why (to prevent thousands of animals being killed), and provide a means of avoiding a fine.

6. *Mandatory desexing will present an enormous management and cost impost onto Councils, and of course, ratepayers¹⁷.*

A Breeder Permit system is a user-pays system. Breeders pay for the permit costs i.e. inspection by local government officers, administration of paperwork, and follow up visits to maintain the permit. The Gold Coast City Council has determined that this cost is \$369, and will be incurred every 3 years. The inspection determines whether the Breeder complies with legislated Standards. Included in the legislated standards is the requirement to desex kittens prior to sale or transfer unless being transferred to another person with a breeder permit, or a vet determines that the animals' health would be seriously at risk if desexed early.

7. *Desexing threatens income and careers of vets and the pet industry*

The Pet Care Information and Advisory Service sponsored presentations to veterinary associations around Australia in 2004 entitled: "Are you desexing your way out of a job?" by Dr Chris Baldock.

"Population Droop – Getting it Up without Viagra" by the late Dr Chris Baldock explained quite clearly that the issue was due to a reduction in the proportion of households owning cats and dogs due to changing demographics, with a growing proportion of older couples without children, lone parent households, and one parent families and group households, which have practical difficulties with pet ownership, not a shortage of cats and dogs, there were still three questions posed, one quite rational i.e. Is the profession interested in reversing this trend?"... "What actions can the profession in general and practitioners in particular take? A third question, though potentially controversial, may be warranted if the profession intends to take action: "Are veterinarians desexing themselves out of business?"¹⁸ If the trend to less pet ownership is to be reversed, more work needs to be done by the pet industry groups on establishing in legislation the rights of owners to keep their pets in rental, and multi-dwelling accommodation, provided appropriate safeguards are in place to ensure both needs of the animals, the owners of the property, and the people living in these

¹⁷ Seksel, Kirsti. 2006. "Compulsory Desexing Wastes Resources" AVA Media Release 27 Oct 2006.

¹⁸ Baldock, Chris. 2006. Population Droop – Getting it up without Viagra" paper for Urban Animal Management Stream of AVA Conference 2006

dwelling are met. Reducing desexing will only exacerbate the problem of unwanted animals. If declining numbers of pet homes is the issue, less breeding and more desexing will be necessary, particularly with the prolific breeding rate of cats.

Michael Hayward, Convenor of The Urban Animal Management Conference presented to the AVA Conference: “No pets – no vets: the single biggest threat to the income and careers of most vets in Australia is declining cat and dog numbers”¹⁹. It is unfortunate that once again there was a misleading reference to “declining cat and dog numbers” instead of “declining cat and dog ownership” – two completely different things.

This paper gives a detailed account of the cause of the decline of pet ownership through pressures on family time, decreasing household block size, increasingly restrictive animal management local laws, increasing rates of desexing with commensurate decline in the availability of puppies and kittens, increasing cost of pet ownership - registration fees, veterinary costs, and decreased community tolerance of pet noise, nuisance and especially any risk of aggression. Decreasing rates of desexing and increasing availability of puppies and kittens is not going to increase the availability of homes for these animals.

The Petcare Information and Advisory Service in “Arguments Against Compulsory Desexing”²⁰ argues that we need more pets in Australia for human health (est. worth 2.2 billion) and economic benefit (pet industry est. worth 3.3 billion). “The decline in the household cat population is a serious problem which will have enormous implications for the public, veterinary profession, and pet care industry.”²¹ It discusses that the majority of pet cats in Australia are desexed, but fails to mention that this relates to cats over 1 year of age. Cats can have been already pregnant by 4 months and have bred two litters before they are 1 year of age. It assumes compulsory desexing will apply to moggies and that no one will be able to breed moggies, resulting in “the decline of the moggy. “The difficulty involved is the deep seated belief that there is still an overpopulation of cats in our society and that many are being euthanased in shelters.”²² This was written at the same time as approximately 120 000 cats, mainly moggies, were being killed in pounds and shelters, with kill rates of 60 – 90% of incoming cats, because there are too many for the number of homes available in the cat breeding season, and many more being abandoned to add to the unowned cat population. A breeder permit system allows anyone to apply for a permit to breed their cat (moggies or pure breed) provided they meet standards of welfare and responsible rehoming by desexing kittens prior to sale or transfer, unless being transferred to another permitted breeder. It supports pet ownership for companionship with associated health benefits, provided pets are responsibly kept, without the downside of thousands of cats being abandoned and killed, which has huge financial and ethical costs to the community who fund local governments and animal welfare organisations to pay for managing the oversupply.

With more owned animals desexed, it is claimed that there will be insufficient cats of suitable temperament, and stray cats will predominate. These strays would also be adopted were there not too many owned cats bred. Allowing more owned cats to breed impacts significantly on a community’s capacity to adopt and desex existing strays and unowned cats.

8. *The majority of dogs entering shelters were relinquished for behavioural reasons. P. 12 and are not rehomable.*

¹⁹ Hayward, Michael. 2006 “No pets – no vets” paper for Urban Animal Management stream of AVA Conference

²⁰ Pet Care Information & Advisory Service. 2002. Arguments Against Compulsory Desexing May 2002

²¹ Pet Care Information & Advisory Service. 2002. Arguments Against Compulsory Desexing May 2002 P.3

²² Pet Care Information & Advisory Service. 2002. Arguments Against Compulsory Desexing May 2002 p.8

The AVA Policy Framework states that: “[Surrender] is usually because of behaviour problems, though a change in living situation of the owner is also a common reason.” This generalisation does not apply to Gold Coast City in which only 20% of all surrendered dogs are due to behavioural reasons. Approximately one third relates to moving and accommodation restrictions for pets. 24% of surrender reasons for dogs relate to owner-related issues that have nothing to do with the behaviour of the animal e.g. ill-health of owner, financial issues, not enough time to spend with the dog, new baby in the house. 14% relate to inappropriate selection. RSPCA Qld data from July 2006 – June 2009 also show that only 15% of surrendered dogs are surrendered due to behavioural reasons and 9% of pups.

The AVA policy framework makes the generalisation that: **“With both cats and dogs, behavioural and health problems they bring with them to the pound often make them unsuitable for rehoming.” (p.2)** This is a misleading and inaccurate generalisation. In Gold Coast City in 2009/10 only 10% of all stray and surrendered cats and dogs demonstrated health or behaviour problems that made them unsuitable for rehoming. Many of those deemed untreatable would also be able to be given the chance of rehabilitation and/or be provided with a safe comfortable place to live, if there were not already so many healthy and treatable animals in oversupply.

9. Other strategies are more important

“Education and public awareness are more important than the actual sterilisation of the dogs and cats per se.”²³

AWLQ strongly supports the full range of strategies to reduce the numbers of unwanted cats and dogs (see the G2Z Model). This includes all of the other strategies proposed by the AVA i.e. school education, owner education, accurate information systems to analyse and track unwanted animals, programs designed to target particular issues or areas, permanent identification. Improved assessment of the animal, potential owner and his or her home, expanding supply channels to responsible non-shelter outlets are already being used by many shelters and pounds.

The AVA suggests the transporting of suitable animals to areas of high demand and low supply. This is possible for very small numbers of areas in the non-breeding season. However, the numbers of unwanted kittens is still too high to allow all healthy and treatable kittens and cats to be rehomed.

All these strategies have not been sufficient. Changing the reactive animal control perspective to work on prevention and rehoming, rather than restrictive practices and killing unclaimed animals, is essential. Having a breeder permit system which requires breeders to consider the broader picture, taking responsibility for the welfare, and ongoing support of the animals they use for breed and their progeny is not unreasonable. Preventing unwanted breeding of cats through desexing prior to sale is instead of killing them is the single biggest preventative strategy that can be put in place. Pet friendly laws and empowering people to fight for their right to keep a pet are also important to increase capacity for responsible homes.

10. The AVA is concerned about the emphasis on paediatric desexing that always comes with the laws. Unnecessary procedures on owned animals at an early age can introduce risk that may not be best for the animals’ welfare in all cases.

Until recently, veterinary schools have not included in their compulsory curriculum the issues of unwanted companion animals or how veterinarians can help address these issues. Vet schools still do not include Early Age Desexing (EAD) surgery in their training programs, despite the fact that there is no known negative impact on cats and many positive benefits. With new understanding and technologies, early age desexing is as safe for male and female kittens as desexing at the traditional

²³ Lawrie, Mark. 2007. “The issue of unwanted animals: an unemotional approach? Paper presented at the AIAM Annual Conference.

age of 6-9 months.²⁴ Cats can be pregnant by 5 months of age.²⁵ One of the problems, at least at the University of Queensland, has been that surgery lecturers have not been exposed to the need for early age desexing or experienced in the techniques themselves. The AVA could be leading the way in encouraging the training of University veterinary staff and existing private practice vets in EAD.

Veterinarians in private practice have a significant role to play in education of pet owners to desex their cats and dogs early before they can contribute to the oversupply of litters. However, the majority of vets in private practice are still educating the public that cats do not have to be desexed till 6 months of age. This means that at least one unwanted litter can be produced per owned cat as cats can be pregnant by 4-5 months of age. A survey of vets organised by the Qld AVA in 2005 showed that "the majority of respondents (57%) never desex dogs and cats from 8-12 weeks of age and a further 27% rarely desex dogs and cats at this age"²⁶. If the AVA policy has approved desexing of dogs and cats from 8-12 weeks of age in pounds and shelters, and vets who practice EAD regularly find it easier and just as safe as later desexing, then it should also be possible for private practitioners to become proficient. Yet 38% rarely and 32% never desex dogs and cats in this age group. Only 2% indicated they routinely desexed cats and dogs at 8-12 weeks of age, and 11% at 12 – 16 weeks of age. "By far the majority (77%) of respondents are recommending to their clients to desex their dog and cats at 6 months of age or greater."²⁷

The situation has not changed significantly since this survey in 2005. From results of a survey of all veterinary clinics on the Gold Coast in 2010, only 13 out of 43 vet clinics i.e. 30% offer early age desexing of kittens from 8-10 weeks. When a workshop run by Professor Jacqui Rand from the University of Queensland, accompanied by a hands-on workshop was offered to update veterinarians on their knowledge and skills, only 6 veterinarians attended, and most of these already practiced early age desexing.

The AVA could be promoting, and providing the much needed education to vets in companion animal practices about the safety and effectiveness of early age desexing in preventing unwanted litters currently euthanized in pounds and shelters. A Victorian Government resource on early age desexing and workshops were run around Victoria in 2004 in conjunction with the AVA, but these have not been continued or expanded. The AVA survey indicated that "73% of those who rarely or never desex dogs and cats from 8-16 weeks of age would be prepared to desex them if scientific papers demonstrated it to be safe and effective."²⁸ The main concern (42%) in relation to early age desexing is the long term health effects, for example, urinary incontinence, etc. This was followed by other (23%) and effects on growth rate and mature size (21%). Private practice vets should be provided with the safe and effective anaesthetic and surgical procedures used by experienced veterinarians in private and shelter practice, and knowledge of the benefits, particularly for cats.

11. Mandatory desexing takes away an owner's and a vet's right to choose.

This is definitely not the case. Responsible owners of domestic cats and dogs will still be able to choose to breed by applying for a breeder permit and complying with a Code of Practice based on best animal welfare and animal management practice.

²⁴ Rand, J. & Hanlon, C. Report on the Validity and Usefulness of Early Age Desexing in Dogs and Cats. Uniquet Pty Ltd, St Lucia pp.10-20

²⁵ Webb (2004) in Rand, J. & Hanlon, C. Report on the Validity and Usefulness of Early Age Desexing in Dogs and Cats. Uniquet Pty Ltd, St Lucia, p.8.

²⁶ AVA Qld Qld: Early Age Desexing Survey (2005) (Unpublished - copy available on request from joy@awlqld.com.au)

²⁷ AVA Qld Qld: Early Age Desexing Survey (2005) (Unpublished - copy available on request from joy@awlqld.com.au)

²⁸ AVA Qld Qld: Early Age Desexing Survey (2005) (Unpublished - copy available on request from joy@awlqld.com.au)

Vets also can choose not to desex an animal if the animal is likely to be at serious risk if desexed. However lack of knowledge and experience in early age desexing should not be the reason for not early age desexing healthy kittens.

12. There are already existing powers to address poor breeders. A breeder permit system neither adds to or subtracts from existing powers from a welfare perspective.

Currently animal welfare laws generally do not require an initial or regular inspection of breeders linked to the Standards in a Code of Practice, where they do exist, for the breeding or selling of puppies and kittens.

Current animal welfare laws requiring duty of care and prohibit cruelty to animals are applied reactively. They first require a complaint, and substantial evidence of cruelty or neglect to enable an unannounced inspection (and an announced inspection can result in covering of evidence). Advice and directives to change behaviour take time and cost of animal management inspectors which have to be funded by the community either by donating to animal welfare groups with inspection powers, or through taxes paid to cover government inspection costs. Prosecution and court cases result in seized animals in limbo for 6 months or more, and breeders allowed to keep trading until proven guilty. Because enforcement takes months or years, this is a high animal welfare and community cost.

Tracking of puppies and kittens from the breeder and consumer information to enable responsible animal welfare choices are currently not provided through existing animal welfare laws. There is no system for consumers to determine whether a puppy or kitten comes from a good breeder or bad when buying over the internet, through a newspaper advertisement or through a pet shop. There is no way to check whether pet shops are sourcing their animals from appropriate breeders, except by random checking if a puppy in poor condition is sold to someone who complains. Usually this person is offered a replacement puppy to prevent any complaint being lodged. Even if a complaint is made, it is difficult to find the breeder who may have used a third party to service the pet shops.

Because there is no national system, which can be checked by consumers, some local governments can ignore poor breeding practices in their communities. If a nationally consistent Breeder Permit system is required in all states for all breeders, they must inspect, and if they authorise a breeder who is poor, the public and animal welfare inspectors will be able to identify that breeder.

People are not deterred from puppy farming as there are insufficient standards to require socialisation and responsibility for rehoming e.g. having a suitable ratio of people required per dog for care and socialisation, and bearing the costs of rehoming any of the animals that the owner cannot continue to care for. Breed organisations acknowledge that they cannot police their own Code of Ethics and that there are poor breeders within their organisations. In Queensland, they are very willing to have a breeder permit system as long as the responsible breeders are supported when applying for a permit.

There is currently no national tracking back to the breeder through the microchip database of each puppy and kitten sold. This is needed along with a breeder permit number to identify that the breeders are meeting standards.

There is no legislation to motivate accidental breeders to act and get their cat or dog desexed, and to desex their kittens prior to sale or giving away. Legislation provides a persuasive tool for responsible community behaviour (e.g. considering the impacts of smoking and drink driving behaviour on others). Breeder Permit legislation provides motivation to become a responsible breeder or stop breeding.

How a breeder permit system provides more than existing animal welfare legislation and Codes of Practice

The GC breeder permit system is a proactive integrated system designed to prevent problems at their source - the breeder. It supports responsible breeders by providing consistency of standards and allowing them to distinguish themselves from breeders who do not meet those standards.

5 ALIGNED COMPONENTS for AN EFFECTIVE BREEDER PERMIT SYSTEM:

1. Applies to **anyone who breeds** (purebred, crossbreed, breeding for profit, hobby breeders, and accidental breeders). It covers the smaller breeders as well as the larger ones who may also be abusing their animals but remain undetected.
2. **Independent government Inspection** required regularly (every 1 -3 years) to check if meeting animal welfare and breeding Standards.
3. **User pays.** Breeders pay for the Breeder Permit which covers the costs of local government officers to inspect, provide certification and keep records. This is in their best interests
4. **Inspections based on compulsory Standards** of care and recommended Guidelines which address care and containment issues, but particularly breeding issues e.g. appropriate socialisation, no in-breeding, acceptable breeding rates, care of the breeding animal on retirement, responsible rehoming requirements. (More guidelines in the existing Gold Coast City Council need to be Standards; however just including some of the elements was a start.
5. **Desexing requirements for kittens.** 40-60% of surrendered kittens are a result of owners not getting around to desexing their cat. Desexing prior to sale or transfer prevents this. Though there won't be 100% compliance. However, it reflects community attitudes and so there will be public pressure to comply, as well as the likelihood of a fine if you keep forgetting to desex. Breeder Permit legislation identifies "accidental" breeders as breeders who either have to get a permit or get their cats desexed. It provides an added incentive for owners to desex their cats now, rather than be reported, and fined. Subsidised desexing programs must be made available and promoted by governments in conjunction with animal welfare groups (who can provide administration of the subsidies and fundraising support) to those who cannot, or think they cannot, afford to respond.
6. **Tracking back to the breeder** (a breeder permit number supported by microchipping which should record the breeding animals, the breeder's name, breeding address and contact details)
7. **Consumer Information** to enable ethical purchasing choices based on welfare when looking for a new pet. All breeders are required to publish a permit number to be included with any advertisement on the internet, in newspapers, on noticeboards, and provided to the purchaser. This shows that they have been inspected regularly (every 1 -3 years) and meet animal welfare and breeding standards.

13. A breeder permit system does little to target the true causes of pet homelessness.

A Breeder Permit system does address the key issues for dogs and cats which are different:

For dogs:

The issues are both homelessness and breeding conditions.

- a. Homelessness - While there is no oversupply of puppies in shelters (they can all be rehomed easily provided they do not come in with congenital defects or parvovirus), there is an oversupply of medium to large dogs, particularly active breeds, especially if poorly trained or socialised.
There shows a lack of breeder responsibility for the lives of the animals they breed i.e. ensuring they go to appropriate homes, supporting owners if they have difficulty with behaviour, taking back the dog if the owner can no longer care for it and rehoming it. Responsible caring breeders currently do this, but those who sell anonymously or through pet shops do not. While owners can often afford to pay for training and support themselves, those who can't, or won't, have to rely on the community to fund this for them through Council or animal welfare programs.
- b. Poor breeding standards - Abuse by over breeding female dogs to have too many litters, destruction of dogs at the end of their profitable breeding period, continuing to breed dogs with congenital conditions or in poor conditions. These animals are sold usually away from the breeder's premises - over the internet, through pet shops, newspapers, so they are difficult to track.

For cats

Over-breeding is the main issue. For example, while only 19% of incoming canines were puppies less than 6 months of age, 84% of incoming felines were kittens less than 6 months of age, in Gold Coast City in 2009/10.

Breed organisations whose members breed specific cat breeds based on consumer demand encourage their members to desex their kittens prior to sale. It is not only in their best interests to limit the numbers bred. It helps protect their cats (undesexed cats are more likely to wander, get into fights, get FIV) and it prevents contributing directly to the unwanted cat population. However not all their members do this.

Other people continue to breed accidentally, with difficulty breaking out of the cycle of unwanted litters due to a cat's ability to get pregnant whilst still weaning a litter. Some still breed through a love of kittens and the desire to have them for the children's enjoyment.

As a result of the current oversupply of cats, some people keep too many cats to protect them from being killed. Once the over-breeding is addressed, there will be less overcrowding in both shelters and pounds, and private homes, and therefore less stress, disease and euthanasia of cats.

THE BENEFITS OF A BREEDER PERMIT SYSTEM ARE MANY

Helps pets: Enables inspections of facilities that breed pets every 1-3 years. Requires responsibility for the life of a pet. Prevents unwanted and abandoned kittens. Increases the value of dogs and particularly cats, as they will not be in oversupply, less negativity about cats in relation to predation, and more care taken to contain and keep safe if less replaceable.

Helps responsible breeders: Provides identification, acknowledgement and therefore reward for being certified as following standards. If everyone is required to sell only desexed kittens, there is no disadvantage to responsible breeders who incorporate the cost of desexing in the price of the animal.

Helps pet owners: Identifies poor breeders through lack of a breeder permit number. Allows new pet owners to buy sound puppies and kittens. Don't have to worry about desexing later; or wandering pregnant cats if they forget.

Helps responsible sellers: They can demonstrate that they are sourcing animals from breeders who meet acceptable standards for the care of their breeding animals and puppies and kittens. They are

not contributing to overpopulation as kittens are already desexed. They work with breeders to help guarantee a home for life for each animal sold, through assisting with rehoming any animal they sell.

Helps vets: More responsibly owned animals means more services e.g. all animals desexed, vaccinated, wormed etc, and animals living longer lives with longer term veterinary care required. It also means more desexing since all kittens have to be desexed unless going to a responsible breeder, and less pressure for subsidised desexing, since if all breeders have to desex their kittens, they can all include the desexing in the price of the kitten

Helps communities: Breeders in the community can be identified. The breeders have pressure put on them to be accountable if they bring new animals into the world when existing animals should be rehomed first. Fewer unwanted kittens. Less nuisance issues, more responsible selling to owners who have the time and capacity to care for the animals.

Helps Animal Management Departments: Addressing the problem at its source; can identify who is breeding deliberately; can address proactively those breeding accidentally or poorly and use the legislation as an incentive to avoid a fine, along with offering desexing subsidy support; a more proactive use of resources; less stress on staff with fewer animals abandoned and killed; community helps identify unpermitted breeders; can close down operations that are not following the standards in the Code. The cost is born by the Breeder not the Animal Management Dept. With fewer unwanted animals and irresponsible owners, Animal Management Departments will be able to focus on provision of services such as off-leash parks and community dog training programs.

Note:

Since puppies and kittens are traded between cities and states, it is essential that a breeder permit system has national consistency to be effective. Can't blame the legislation if it can be eroded from outside.

14. Isn't it better to put money into education and support programs

Both are needed. It's not "either ... or" but "both and".

We need support services to cater for existing stray and surrendered owned animals and owners who are currently struggling with their pets. Support services are tackling the issue at the reactive end, not the proactive end.

Education programs on how to choose a great dog are worthwhile and exist now. However it is not enough. Breeders and sellers also need to be required to take on more responsibility for the rehoming they do i.e. be required to check the capacity of the owner and give good guidance and life-time support .

Subsidised desexing is also essential for existing animals in at risk communities, and should be offered. However the funding for this is difficult to get, and currently insufficient.

Desexing of kittens required prior to sale or transfer increases provision of desexing services by vets to breeders and pet shops. Costs of desexing can be incorporated into the sale price of the animals. It will reduce enforcement work by animal management departments, with smaller number of breeders and sellers of kittens, than owners, to check. All breeders and sellers of pets have to advertise or display their animals for sale, so consumers can help with checking for Breeder Permit numbers and reporting or not purchasing animals with no government Breeder Permit Number.

15. Breeder permit legislation is an adversarial and draconian approach

Quite the opposite. Working with a Stakeholder Coalition to develop a breeder permit system to address the issues of the various breed organisations, welfare organisations, government and wildlife organisations has been very helpful. Both cat and dog breed organisations have been supportive of the breeder permit system. Responsible breeders have welcomed the opportunity to

be distinguishable from those who are irresponsible. Breed organisations have acknowledged that while they have a Code of Ethics, they have had little capacity to inspect breeders to ensure they are complying with the code. Non-pure breed breeders have been exempt from the main dog and cat breed organisations.

Rather than being a harsh system, it is a very fair system for all affected by cat and dog breeding. It is not prohibiting breeding. It supports responsible breeding. It helps to identify good breeders, and prevent consumers inadvertently supporting poor breeders. This means minimal enforcement as consumers can respond to poor breeding by not purchasing these animals.

While some animal owners will not comply and it will take time and education to get high levels of compliance, just as with all legislation, including registration and microchipping, it will set the standard that desexing is necessary for socially responsible pet care. Pet shops and breeders who work with AWL Qld are willing to desex prior to sale or transfer, but would like a level playing field with all sellers being required to do so, so that they are not disadvantaged by having to include the cost of desexing in the price while others don't. Increasing knowledge and experience of vets in Early Age Desexing from 8 -12 weeks, is important so that early age desexing is readily accessible.

Nathan Winograd is a strong proponent of "rigorous and comprehensive expectations codified in law"²⁹. He proposes a Companion Animal Protection Act to ban the killing of cats and dogs in pound and shelters and require pound and shelter directors to use the life-saving programs of the No Kill Equation. This can make a huge difference, but needs to be assisted by breeders (anyone who breeds) working on the prevention side.

A Breeder Permit system sets rigorous and comprehensive expectations for breeders to prevent poor breeding and rehoming standards and unwanted litters. It applies to all breeders (whether accidental or intentional, pure-breed or mixed breed, large scale, hobby breeder or back yard). It requires people to make a decision about whether they are serious about breeding or not.

A Breeder Permit system assists local governments to put in place the programs that are required in the Companion Animal Protection Act. It will be less difficult for shelter directors to save lives when there are fewer accidental and irresponsible breeders who produce litters with no homes to go to or use poor breeding practices that result in misery for the animals.

The Getting to Zero Model outlines that the key elements are provision of services for desexing both owned and shelter animals, and strong rehoming programs. A Breeder Permit system complements the programs of pounds and shelters, in that it is an incentive for breeders to both prevent unwanted animals and rehome responsibly their breeding animals and litters.

Conclusion

It is important that stakeholders work together to understand the data, and negotiate solutions on a national level. The debate about mandatory desexing has been ongoing now for over 8 years. However, discussions and negotiations with Queensland stakeholders has resulted in the development of a system that is agreeable to all parties - a breeder permit system with desexing of kittens required prior to sale or transfer at 10 weeks of age.

This one integrated cost-effective system addresses the different issues related to dogs and cats i.e.

- (i) poor breeding and irresponsible rehoming of puppies, which leads to sick and abandoned dogs
- (ii) oversupply of kittens due to their prolific breeding rate and capacity to breed from 4 months of age. So that there can continue to be cats available to suit the market, and vets can still determine if an animal should not be desexed, exemptions to kitten desexing apply if selling

²⁹ Winograd, N. 2009 There Ought to Be a Law. www.nathanwinograd.com/?p=670

or transferring to another permitted breeder, or if there are serious health risks to the animal. The main cat breed organisations in Queensland have supported this legislation.

There are benefits for all stakeholders:

Animals will be more protected from poor conditions and abandonment, so that eventually only healthy socialised animals will be available for sale and there will be sufficient homes for them all.

A breeder permit system does not put a burden on local governments as breeders pay for the inspections. Local governments will receive more community support by putting their energies into proactive preventative and support strategies, and they will more easily be able to implement rehoming with fewer abandoned animals.

Responsible breeders benefit from being distinguishable from irresponsible breeders.

Owners will have less worry about buying a puppy with a heart defect or supporting abuse of breeding animals. They won't be able to forget to desex and so will not have constantly pregnant female cats and unwanted litters. They will be more informed, and supported by the breeder.

Communities will benefit from having fewer nuisance issues, and an oversupply of animals to care for.

Vets will be able to work closely with breeders and pet shops to provide high standards of early age desexing of kittens within the vaccination cycle, knowing that cats are not to be rehomed prior to 10 weeks. Rehoming at 10-12 weeks is recommended by the main cat breed organisations.

Pet shops and the pet suppliers will have a more sustainable and ethical industry if they source animals only from permitted breeders, sell desexed kittens, and take responsibility for the life of the animals they sell, and work with open and accountable breeders to provide owner support and rehoming programs.

Animal welfare and rescue groups will no longer be overburdened with excess animals. They will be able to provide services of shelters and foster homes to assist local government, breeders and pet shops with rehoming, and for emergency care for all animals in need.

Recommendations

All stakeholders need to work together to progress a Breeder Permit system for national consistency.

While the Gold Coast Breeder Permit system is in its infancy with implementation issues still being addressed, it is a Pilot that has involved much consultation and negotiation, and so provides a good basis for discussion and consideration now on a national level. Its development included analysing all existing government Breeder Codes in Australia at the time of development in 2009, and Queensland cat and dog breeder organisations' Codes. Experiences of other State and local governments with breeder codes and permits can also be gathered and will also be invaluable.

The Australian Animal Welfare Strategy framework together with existing networks of State and Local Governments may provide a process for these discussions, provided all key stakeholders are included in the negotiations to develop understanding of the key issues and solutions that are effective. It is important that supportive people are provided from each organisation who are committed to implementing solutions as soon as possible, and are willing to be open and honest about their concerns, so they can be discussed and addressed.

It is important to work on national consistency as soon as possible as animals are traded and moved between states. Currently each state is progressing legislation on this issue and it will be an opportunity lost if there is not some consistent breeder permit legislation.

In the meantime, each stakeholder group can help to progress those elements of the system which are suited to their expertise:

- AVA and Veterinary Schools – Progress early age desexing knowledge and experience to ensure high standards of desexing for breeders of kittens
- PIAA – Support rehoming of abandoned animals. Source animals from only permitted breeders who can be tracked through their breeder permit numbers and microchipping back to the breeder. Take responsibility for rehoming in conjunction with the breeder to ensure that all animals are supported with rehoming; and all breeding animals are also rehomed if not able to be cared for by the breeder. Until a consistent national breeder permit system is implemented, use only suppliers who meet the standards and guidelines of the existing Breeder Permit system with high welfare standards and owner support, and require sellers to desex all kittens prior to sale or transfer.
- Breeders – Support the development of nationally consistent standards and inspection system
- ACAC – As a pet industry body, support the development of a nationally consistent breeder permit system, working closely with animal welfare groups
- PIAS – Develop consistent legislation nationally for owners of pets to be supported with pet friendly accommodation.
- Animal Welfare – Provide rehoming services supported by breeders and pet shops, and emergency care. Assist with provision of community and Council funded subsidised desexing services
- Animal Management – Run an efficient and ethical breeder permit system, which requires desexing of kittens prior to sale or transfer. Support responsible breeders. Provide desexing subsidies for people who are accidental breeders or do not want to breed but have financial difficulties. Prevent impoundment through returning animals to their owners with minimal fines, and provide an advice and support service to prevent unwanted animals. Provide high standards of care and strong rehoming programs in conjunction with community volunteers, foster carers and animal welfare groups
- Community - adopt abandoned cats and dogs from shelters, rescue groups and pet shops. If no suitable animals available, buy from government permitted breeders or sellers who provide breeders details and allow personal inspections.
- State Governments – Progress the discussions and negotiations for development of nationally consistent breeder permit systems across local governments and across states