



**Submission from the Cat Protection Society of NSW  
to the NSW Department of Primary Industries Consultation Paper:  
Licensing and regulation of cat and dog breeders**

The Cat Protection Society of NSW notes this consultation paper was released in the same period as a bill before NSW Parliament seeking to restrict companion animal breeding practices, and the referral of that bill to a Select Committee.

We also note the paper was released on 16 November with submissions closing on 31 December 2021.

Cat Protection submits that six weeks (which includes the Christmas period) is an inadequate amount of time for consultation on such a complex topic. It is impossible for many given we have been dealing with the additional strain on all our resources to safely manage COVID-19.

We are also concerned that the paper not only deals with a wholly new scheme (a licensing scheme) but also contemplates the removal of existing regulations for some breeders. Furthermore, the community (including Cat Protection) is being asked to comment in the absence of knowing what is proposed in the NSW animal welfare law reforms more broadly.

We have previously submitted, and reiterate our view, that the existing Animal Welfare Code of Practice: Breeding Dogs and Cats, does not provide for the health and welfare standards that the community would reasonably expect for dogs and cats in 2021. The improvements proposed by DPI in its October 2017 discussion paper were worthy but misunderstanding and misinformation from breeders saw the proposals not amended, not deferred, but simply never seen again. The recent review was limited to minor issues of drafting for the sake of breeders' comprehension of their obligations and not for the sake of animal welfare. There have been no meaningful improvements to the regulated standards in over a decade.

Establishing a new licensing scheme for 'some' breeders; leaving 'some' breeders subject only to the (inadequate) Code of Practice; and leaving 'some' breeders out of any breeder-specific regulation represents a very significant change and ought to involve significant consultation and thus time and information.

Cat Protection believes the health, safety, welfare and wellbeing of breeding cats and dogs is not protected under existing legislation, regulation, standards and guidelines. We believe these issues should be considered together: that is, the

legislation along with applicable regulations, codes and standards and guidelines, with more detail on the proposed framework and more time for consultation.

We are unable to provide any detailed comment in the timeframe, beyond restating our comment from July 2021 that the Welfare in Pet Trade Responsible Cat Breeding Guidelines (and the Dog Breeding Guidelines) endorsed by the EU Platform on Animal Welfare in November 2020 provide a good place to start from which to develop meaningful, welfare-considerate guidelines.

We are unable to provide reasonable comment on the consultation paper because it lacks context and detail. There is, however, one point we would like to make: the paper notes that a breeder licensing scheme would be based on the principles: “easy to understand” “proportionate costs” and “minimises unintended consequences” but the principle of protecting animal welfare is not listed.

Whether or not there is merit to separate regulations for different categories of breeders, the explicit and stated principle of any animal welfare law should be the protection and promotion of animal health, safety, welfare, and wellbeing.

Thank you for the opportunity to provide feedback.

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Cat Protection Society of NSW

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