

Views pertaining to the regulation of pet shops and pet breeders for consideration by the Legco Food Safety and Environmental Hygiene Affairs Panel in respect of item IV of the agenda of their meeting of 9 / 6 / 09 – amended

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Submitted on : 8 / 6 / 09

STOP! Save HK's Cats and Dogs (formerly known as the Hong Kong No Kill City Forum) is a coalition of 23 animal welfare groups created with the aim of reducing the unacceptably high number of surplus companion animals abandoned and, in many cases, destroyed every year. One of the main planks of this aim is the promotion of stricter regulations in the pet trade.

All parties, including animal welfare groups, the AFCD, the pet trade itself, and the majority of the public recognise the need for far reaching reform of the laws controlling the buying and selling of companion animals, as evidenced by the recent press coverage the topic has received.

As companion animal ownership in Hong Kong increases exponentially, the trade has become a highly lucrative one which has attracted a large number of unscrupulous players who are generally more interested in profit than in the welfare of the animals in their charge. Many puppy mills have been set up, most of which are unlicensed and unsupervised, which has led to the appalling situation where thousands of companion animals are regarded as little more than commodities bought and sold with little or no regard to their health and quality of life. Many of the puppy mills are said to be based over the border in Guangdong, with the animals smuggled into Hong Kong on a regular basis.

The breeding animals are kept in cages during their reproductive years and are basically regarded as production equipment, being required to produce far more litters per year than is good for their health and well being. Once the animals are no longer reproductive, they are more often than not simply abandoned.

Many of the offspring are born with congenital problems due to a lack of control over their genetic lineage and many become sick due to the unsanitary conditions in which they are forced to live. The offspring are removed from their mothers at too early an age, leading to further health problems as immunity is actually passed to them from their mothers as they breast feed during the first few weeks of their lives.

The offspring which survive are then sold in the shops of Hong Kong, where they are bought by an unsuspecting public unaware of the misery they are funding with their purchase of the animals, and of the heartbreaking and costly health problems they may well be purchasing along with the animal. In research carried out by the SPCA of sick pet shop puppies seen at their clinics 78% of respondents indicated that they had bought an animal which had developed a serious disease within one week of purchase. At least 20% of these animals subsequently died.

Many of the staff in the shops selling these animals have little or no knowledge of how to care for the animals in their charge and simply do not know how to look after them or what advice to give to new owners.

As these animals are so readily available in all of the main shopping centres in Hong Kong, and as the public is able to buy fashionable 'breed' animals at such a low cost due to the extremely low standards of the breeding facilities, many of the animals are purchased on a whim and once the health problems of the animals become apparent, and / or the owner realises the responsibilities associated with animal ownership, there is a strong likelihood that the animal will be abandoned either by surrender to the AFCD or an already full animal shelter, or on the street.

Approximately 2,000 abandoned animals are collected from the streets of Hong Kong by the AFCD every month and destroyed in their animal management centres. It is estimated that 2,000 animals are smuggled into Hong Kong every month for sale in our pet shops. The conclusion to be drawn is self-evident.

To break this cycle of misery and death we propose the following basic steps :

- 1.) The licensing of and implementation of minimum welfare standards at all cat and dog breeding facilities and shops selling companion animals and the STRICT enforcement of these licensing and welfare requirements. The welfare standards should cover healthcare, diet, exercise, living conditions, sanitation and the genetic lineages of the animals being bred. If the facility does not have the required license and does not meet the required welfare standards then they should not be allowed to operate until they have the license and meet the welfare standards. There should be a policy of zero tolerance.
- 2.) All cats and dogs sold should be microchipped back to the mother to prevent the sale of animals from illegal breeders and of smuggled animals. The reason given for not currently carrying this out is that it is difficult to implement. We do not fully understand why this should be so.

These are the minimum requirements we would like to see implemented and should be applied to ALL sources of companion animals.

Other steps we recommend are as follows :

- 1.) That a person intending to purchase a new animal from a licensed trader be required to wait for a period before actually purchasing the animal, perhaps 2 weeks. This cooling off period would reduce the number of impulse purchases later regretted and abandoned. This requirement was implemented in New South Wales, Australia in 2008.
- 2.) That all staff involved in the sale of companion animals be required to undergo training to learn about the dietary, health, exercise and lifestyle requirements of the animals they are selling. For example, shop staff currently sell dogs along with cages in which to keep them. They should instead be telling new owners that dogs should not be kept in cages and that they require a certain number of kilometers of exercise every day depending on the size and breed. The staff

should also be trained to recognise common health problems which require veterinary care. Staff selling companion animals in Singapore are required to undergo such training.

These are our proposals.

We find the current proposals from the Administration to be wholly inadequate. The most unacceptable, although by no means only, issue is the continued inclusion of the 'hobby breeder' loophole as laid out in paragraph 4 part (d). This loophole was roundly criticized by all parties, including the Chairman of this panel, when it was included in the proposals submitted to the panel on 13 / 5 / 08 and the fact that the Administration has seen fit to include it in the current proposals after having had more than a year to consider the issue is extremely surprising and disappointing. This loophole provides pet breeders with a means to completely evade the requirements of an Animal Trader License.

There appears to have been a superficial attempt by the Administration to mitigate the previous criticism in paragraph 8 part (b), but the documentary requirements mentioned here are meaningless. The legal responsibilities of these breeders would begin and end with the provision to their customers of declarations that they have no more than two litters of one breed and that their dogs are licensed. One of the criticisms of the Chairman of this panel at the meeting of 13 / 5 / 08 was that there was no mention of how such breeders would be monitored. There does not appear to have been even an attempt at serious progress in the last thirteen months.

Even the documentary requirements covering establishments with ATLS as laid out in paragraph 8 part (a) are totally inadequate and open to abuse. The only way to completely ensure that animals are from a legal source is that they be microchipped back to the mother. Once again, we do not understand the Administration's reluctance with regard to this requirement.

In conclusion, we regretfully inform the panel that we find the current proposals from the Administration to be unacceptable.