

Response to

Consultation Document

“Better Regulating Pet Trading to Enhance Animal Health and Welfare”
(October 2012)

Animal Earth

This document outlines the response from Animal Earth (We) to the captioned matter recently raised by the Government.

Regarding the amendments proposed in the consultation document, we would like to bring forth the following response.

1. When animals are being bred and traded as pets, they are bound to exploitation or even abuse. Therefore, we, in principle, are against any form of animal trading.
2. In paragraph 1.2 of the consultation document, it was mentioned that “the Government is responsible for, amongst other things, the regulation of animal trading ..., management of pet and stray animals, ...”. However, the present proposal only narrowly covers pet trading but with no regard given to the overall effect the pets trade bring to animal rights and welfare, namely, hasty purchases of pets that bring about abandonment and, thus, stray animals.
3. The proposed amendment removed the current exemption for “self-claimed” private pet owners to sell their animals without a license, and replaced it with four categories of licence in an effort to strengthen regulation. However, the consultation document includes no detail on the licensing conditions. This apparently seems to be a strengthening of control. In substance, however, this will likely result in further

legalization and expansion of the pet breeding industry, aggravating the problem of abandonment and strays.

4. In fact, some cities overseas have already made it illegal to sell animals in pet shops, or permit only sale of rescued abandoned animals. We strongly suggest the Government to take a macro view in this direction and consider the overall picture of animal rights and welfare. Notwithstanding the short term impracticality of a complete ban of animal trading, it is unacceptable for the Government to broaden the market of pet trading by bringing in new licensing schemes, thereby increasing the number of animals being exploited.
5. With the above long-term goal towards animal rights as an overriding theme, and amidst the imminent problem of outdated laws, we view the Government's proposal as a short-term relief of animal exploitation in the pets trade. We, therefore, propose the following changes.
6. Apart from dogs, it is obvious that cats are common pets in Hong Kong and constitute a considerable portion of revenues of pet shops. In fact, cats were often the major victims in many past cases of low quality breeding establishments uncovered by the media. We, therefore, strongly suggest that cats be included in the regulation of breeders.
7. The proposal includes a one-off permit for genuine pet owners to sell their animals and two such permits may be issued to a person within a 24 month period. We maintain that, in the first place, owners of animals should not offer to sell their animals at all. We, therefore, propose that each person may only apply for such one-off permit at most one time during the person's entire life, thereby preventing owners from abandoning their animals in the name of selling.
8. In many cases in the trade, animals are used like breeding machines. Excessive reproduction often causes collapse and long-term suffering to the animals. We suggest the amendments to include age limits and

maximum breeding frequencies for the animals. The laws must also introduce measures to safeguard retiring animals and ensure they will receive proper care during their remaining lifespan.

9. We suggest that the licensing conditions should include requirements for operators of breeding establishments to have recognized knowledge or professional qualifications on animal heredity, lacking which will often bring about tremendous suffering to offspring of animals.
10. To prevent problems of abandonment and stray animals, the Government should take serious steps to combat animal abandonment, and consider mandatory neutering of pets. Publicity and education should be strengthened to promote the message of “adoption instead of buying” and respect for living beings.

Animal Earth

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