



Re: Invitation letter to the meeting of Panel on Food Safety and Environmental Hygiene of Legislative Council on 13 November 2012 (Agenda item IV)

Sally

to:

Liza KL LAM

06/11/2012 14:18

Sent by:

Hide Details

From: Sally <sally@hongkongdogrescue.com>

Sent by:

#### PROPOSED AMENDMENTS TO ANIMAL TRADER REGULATIONS (Cap 139B)

As Founder of Hong Kong Dog Rescue I see first-hand the results of lack of regulations regarding the breeding and selling of dogs and puppies. I very much welcome the proposed amendments to Cap 139B and would like to offer these comments and observations:

I find the current laws provide no protection against abuse of animals or deterrent for offenders should they be caught breaking the law. The case as quoted in the AFCD Consultation Document citing a Private Pet Owner (PPO) also known as a 'Hobby Breeder' who kept over 90 breeding dogs illegally, and was fined a derisory \$1200, a perfect example of ineffective and useless legislation.

Proposed ABLA: The amendments include a proposal for Animal Breeder License A to permit no more than four entire female breeding bitches in the premises. This would apply to the Hobby Breeders, who are currently no more than commercial breeders pretending to be pet owners.

While the proposed restriction is an improvement on the current lack of any regulations, I believe that pets should not be used to make money and that there should be no home breeding for profit permitted under any category. Any animal used to provide income is not a pet and the owners should therefore be classified as a commercial breeder regardless.

In any case, 4 bitches is too many, the maximum should be 2 only, taking into account the fact that at any time there could be 4 adults and 4 litters of anything up to 10 puppies in one (probably small) area. The proposal to allow each bitch to have 3 litters in 2 years is also too lax. No bitch should be made to have more than one litter each year.

It would be extremely hard for AFCD to monitor breeding in private homes and abuse of the law is certain to continue.

Any control of PPO or Hobby Breeders is welcomed, although the restrictions should be more stringent than proposed. I agree wholeheartedly that no person should be allowed to advertise or sell puppies in any way without a declared license or permit number. In fact no animals should be advertised or sold over the internet, nor should any animal be sold to a minor without parental consent.

Proposed ABLB: The dog breeding trade as a whole needs to be properly regulated as there are too many cases of animals kept in appalling conditions, and those that are lucky enough to escape from these facilities for whatever reason are without exception diseased and/or suffering. Dog breeders are not dog lovers, they are business people who are making money out of animals who have no choice. Breeding facilities must be properly regulated and routinely checked for abuse. Welfare standards should be set and enforced. There must be a minimum standard of care which ensures that no animal is suffering or is forced to lead a life of misery, which is currently the case. The pet trade as a whole needs a complete “makeover”, and those who cannot or will not take proper care of their animals should be fined and their licenses revoked, with a lifetime ban on keeping animals again. We are not a Third World country.

ATL (Pet Shops): Although pet shops are already covered by existing regulations they are not being enforced. Puppies that are too young and often sick are kept in cages that are too small, and details of puppies being sold are not recorded. There are many abandoned dogs with pet shop microchips that have never been rabies vaccinated (at 5 months, as is the law) and have no license or registered owner. Pet shops should be made to keep full and proper records of all puppies sold which should be made accessible to AFCD at any time. Laws are useless if they are not enforced or enforceable.

It is absolutely imperative that the Director of AFCD be empowered to revoke the license of any trader who is in breach of the license terms or has been convicted of any offence under the Prevention of Cruelty to Animals Ordinance (Cap 169).

I fully support the increase of penalties for illegal trading of animals and the breaching of animal trading license conditions to the maximum level possible. The current figures of \$2000 and \$1000 make a mockery of the law, and are not deterrent whatsoever. It can be compared to an automatic fine of \$1500 for dropping of a piece of litter when in fact there is no comparison in the actual offence.

In conclusion, AFCD have my full personal support, and that of Hong Kong Dog Rescue, for their proposals to improve the lives of the dogs being used for breeding and selling. I ask that Legco Members take into account the fact that there are many thousands of dogs lovers in Hong Kong who care very deeply about these matters, and it's time to make the long overdue changes to the current laws.

Sally Andersen

Founder

Hong Kong Dog Rescue