



Re: Consultation Document entitled “amp;Better Regulating Pet Trading to Enhance Animal Health and Welfare” / LegCo Panel on Food Safety and Environmental Hygiene (meeting on 13 November 2012)

Alexandra Yeong

to:

Cap139B_amendment

07/11/2012 11:07

Cc:

Hide Details

From: Alexandra Yeong <>

To: Cap139B_amendment@afcd.gov.hk

Cc:

Dear Sirs,

I am writing to support the long overdue proposals put forward by the ACFD in the captioned consultation document and would like to offer the following comments and observations –

Removal of exemption of PPOs in relation to dogs

- The initial stage should include cats
- ABLA – this category is aimed at home breeders; hence the criteria should be more stringent; 4 litters for breeding are too many, a home breeder should not have more than 1 litter. Pets should not be used to make money, home breeders who do so for profit should be classified as commercial breeders.
- ABLB –
 - The dog breeding trade needs to be properly regulated and regulations enforced; there are too many cases of animals kept in appalling conditions. Dog breeders are **NOT** dog lovers, they are business people who make money out of animals who do not have a choice in the matter. The conditions under which many of these breeder animals are kept would amount to abuse in most other civilized countries.
 - In addition to licensing, welfare standards must be set; there must be a minimum standard to ensure that no animal is suffering or is forced to lead a life of misery, which is currently the case.

- Implementation of regulations and standards alone is insufficient; regulations need to be enforced through proper inspections, prosecutions and revocation of licences when there are breaches - breeding facilities must be properly regulated and routinely checked for abuse. Consequences of breach of regulations and standards must carry sufficient deterrent effect.
- ATL: Although pet shops are already covered by existing regulations, there is no proper enforcement. Puppies that are too young and often sick are kept in cages that are too small – one only has to walk past any pet-shop such as those on Cannon Street in Causeway Bay to see this.

Proposal to increase penalty for contravening regulations relating to (a) carrying on business as an animal trader without a licence (b) hawking animals/birds (c) selling an unweaned animal – to deter illegal trading of animals or non-compliance with licensing conditions

- The threat of imprisonment is often a more effective deterrent than a heavy one-off fine. For breeders, the proposed maximum fine is probably not much of a deterrent (and maximum penalties are rarely imposed). The proposed penalties should include imprisonment, so that courts have the flexibility of imposing a term of imprisonment in severe cases (such as a recurring offences or cases with aggravating features).

Proposal to empower AFCD to revoke a ATL

- 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) should be revoked; in the case of a person who has been convicted of an offence under Cap 169, a lifetime ban from being licensed should be imposed.

Regards,
Alexandra Yeong