



PROPOSED AMENDMENTS TO ANIMAL TRADER REGULATIONS (Cap 139B)

winnie

to:

07/11/2012 23:30

[Hide Details](#)

From:

To:

Dear Ms Lam

Thank you for inviting public responses to the proposed amendments to the Animal Trader Regulations.

I am against the home breeding of pets for profit in Hong Kong, because the high-density, small-space nature of most private homes in Hong Kong forces such breeding activity to (by necessity) be inhumane and unsafe, in order to be economically feasible. Put simply, the commercial breeding of pets in private homes should be disallowed for the same reason the commercial breeding of geese, antelope or pigs in private homes is disallowed - it is unsafe, unsanitary and inhumane.

Governments and municipalities in other parts of the world have demonstrated that it is entirely possible and practical to ban the commercial sale of pets in stores entirely (for example, in Los Angeles, pets are available to the general public only via not-for-profit adoption through duly certified/licensed rescue organisations/charities). I am supportive of such an approach, and would highly recommend that it be followed here in HK as well. In HK, there is currently an abundant over-supply of domestic animals (dogs, cats, rabbits, etc) of all sizes, breeds and ages, available for adoption from reputable charities such as the SPCA, Hong Kong Dog Rescue, Society for Abandoned Animals and Lamma Animal Protection Charity, among many others. These organizations have instituted policies and procedures to screen all prospective adoptions to avoid animals being placed into homes where domestic dogs/cats are disallowed (eg. public housing estates), or with owners who do not have the time or capability to handle a particular animal type. Commercial pet stores do not implement any such policies or procedures, resulting in many pets purchased from such stores to be subsequently abandoned, as demonstrated by the number of pedigree dogs and cats available for adoption from these rescue charities.

Nevertheless, if it is the intention of the HK legislature to permit the commercial breeding of pets in HK, I believe that such activity needs to be very tightly regulated. For instance, any such activity ought to be strictly licensed, with licences to be granted by the AFCD only after applicants' premises and operations have been satisfactorily inspected by a duly authorized AFCD officer for compliance with standards that ensure sanitation, safety and animal welfare. The AFCD should also be empowered to conduct "spot" inspections on licensees at any time after initial grant of licence, as an ongoing condition to the licence. The AFCD Commissioner

should also be empowered to (1) revoke and suspend licenses, (2) impose discretionary conditions on licensees, (3) levy meaningful fines/penalties on licenceholders who breach the terms of their licences or fail to pass any subsequent inspection/audit, and (4) prosecute offenders in a court of law. Furthermore, the law should be amended such that potential remedies available to the judge/court should include: (a) criminal sanction and (b) court-ordered injunctions or remedial action requiring certain activities be undertaken by the convicted, such as community service, making certain upgrades or improvements to their operations/premises, etc.

Thank you for considering my response.

Yours sincerely,

Winnie Lui
Resident
Kennedy Town, Hong Kong