



PROPOSED AMENDMENTS TO ANIMAL TRADER REGULATIONS (CAP 139B)

- URGENT

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to:

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From: "Betty CHAN - DE (DHL HK)" <>

To: "" <>

Dear Ms Lam,

Please see below my personal views:-

It seems there is a general consensus that the allowance of 4 breeding bitches for PPOs is too high, and that there should be no distinction between Hobby breeders or commercial breeders at all. Using dogs for profit is a business and as such should be regulated as one, and income derived from such business should be taxable and declared to the Inland Revenue. I'm sure the currently Hobby breeders do not declare any of their income. I therefore propose that there should be only one category of Animal Breeder license and no licenses issued to Private Pet Owners for breeding and selling purposes.

Anyone who keeps more than one entire bitch for breeding and trading purposes is running a business and must be subject to the same licensing condition as any commercial breeder. Apart from the welfare of the dogs, this would also simplify the procedures for AFCD. Additionally PPOs should not be allowed to sell the offspring from their bitches for profit.

At present it is the taxpaying public who pay for the catching, keeping and killing of dogs at the 4 AFCD Animal Management Centres. I understand the last audited cost was \$30 million. HKDR take in more dogs from AFCD than any other organisation and cover the cost of licensing and lifelong care, or until the dog finds a new home, through our own fundraising efforts.

It has proved impossible for HKDR to find any suitable land to build a permanent Homing Centre while it seems the HK Government are willing to offer assistance to breeders who want land to build breeding farms (as heard at both the AFCD consultation and at Legco). Where is the logic in issuing licenses for breeding more dogs when so many thousands are killed by the Government every year? It makes no moral or financial sense.

By closing the Hobby Breeder loophole completely, not issuing licenses to PPOs and restricting all breeding to highly regulated licenses breeders, the numbers of dogs being abandoned and destroyed can be reduced, as well as the welfare of the breeding dogs improved and monitored.

There is no question that any licensee breaching the terms and conditions of the license, or found guilty of any cruelty towards the animals in his/her care, should have the license revoked and a lifetime ban imposed.

The matter of free trade and loss of livelihood has been raised, but in the matter of pigs and chickens the issue was resolved. The right to earn a living does not mean that any animal should be used for that purpose with no consideration for either the welfare of the animal or the resulting overstock meaning thousands of other animals have to be destroyed.

If the smuggling of puppies from Mainland China could be controlled (or even better, stopped completely), then there would be easier to regulate the pet trade in general, and the quality of life for all concerned. The threat of rabies must be taken seriously and must never be allowed to enter Hong Kong from China.

Our choice would be to push through the amendments but with only one license which would cover all breeders, whether in private homes or in commercial establishments. We would like to see all home breeding for profit made illegal, and for all breeders to have to comply with the same levels of care an animal welfare regardless of numbers.

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).

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.

Yours sincerely,

Betty Chan