

28 April 2016

To: Panel on Food Safety and Environment Hygiene

Attn: Chairman

Dear Chairman,

Support for the proposed amendment of CAP 139b to better protect dogs being bred and traded in Hong Kong.

We the undersigned support the introduction of the amendment under CAP 139b proposed by AFCD.

We believe that the proposed legislation with the framework of 3 licences (ATL, ABLA, ABLB) and the related additional licence conditions and mandatory codes of practice (including the “One-off” dog selling permit) greatly improves regulation of the dog trade and affords an opportunity to move forward with protecting dogs used by the trade.

For over 20 years the animal welfare community has been asking the Government to amend the legislation under CAP 139b governing the trade and breeding of dogs.

Consultation on improved regulation of the trade in dogs was conducted in 2008. Subsequently a proposed framework was put forward in 2009, however, there was concern at this time that private pet owners breeding for commercial gain would not be covered by the proposed licensing regime, providing a loop hole that unscrupulous traders could exploit. Consequently more research was undertaken and a new framework has been proposed by the Government that closed both the loop hole of the private dog owner breeding for commercial gain and also that presented by a private dog owner selling their own dog.

It has taken a long time and a significant amount of work on all sides to reach this stage. There is now a concrete proposal on the table that will make a big difference to the lives of thousands of dogs but until the CAP 139b amendment is introduced dogs used by the trade are left vulnerable on a daily basis with no proper regulation or oversight. We do not want them to suffer more through failure to introduce the proposed legislation when finally presented this year. The proposed legislation introduces a new regulatory system, increasing oversight and control as well as setting minimum standards and giving guidance on care and best practice. Further delay is unacceptable, it has taken 8 years to get to this stage.

We recognise that animal welfare legislation often changes incrementally, and the expedient introduction of the amendment to CAP 139b is a vital first step - introducing a new framework can support revision as necessary. Improvements can be made over time as needed through amendment to the licensing conditions and codes of practice but without implementation of the

primary amendment we are still left with a dramatically deficient regulatory system and a cycle of poor control and poor welfare.

In closing we urge all legislative councilors to help protect the welfare of dogs and to support the introduction of the amendment to CAP 139b proposed by AFCD without delay.

We would be grateful if you could circulate a copy of this letter to all Legislative Councilors irrespective of their being a member of the Panel on Food Safety and Environmental Hygiene so that they can be made aware of our opinion.

For further information or follow up please contact Gloria Li of STOP on [REDACTED].

Kind regards,

Animals Asia
Cheung Chau Animal Care (CCAC)
Companion Animal Federation (HKCAF)
Concern Group for Pets
Dog Rights Concern Group (DRCG)
Green Animals Association Ltd
HK Rescue Puppies
Home Dog Home
Hong Kong Alley Cats
Hong Kong Animal Adoption Centre (HKAAC)
Hong Kong Cats
Hong Kong Dog Rescue (HKDR)
Lifelong Animal Protection (LAP)
Protection of Animals Lantau South (PALS)
Sai Kung Stray Friends (SKSF)
Society for Abandoned Animals (SAA)
STOP ! Save HK's Cats and Dogs (STOP)
The Society for the Prevention of Cruelty of Animals (SPCA)

Cc Secretary of Food and Health Bureau
Director of AFCD