Our Ref: BM | LR

23 December 2024

Kevin de Witte
Chief Veterinary Officer
Animal Biosecurity and Welfare
Department Natural Resources and Environment

Via email: dogreview@nre.tas.gov.au

Dear Kevin,

Improving Dog Welfare Outcomes

Thank you for the opportunity to provide a submission on the Improving Dog Welfare Outcomes in Tasmania discussion paper. This submission has been prepared by the Local Government Association of Tasmania (LGAT) on behalf of Tasmanian local government in collaboration with our members; all 29 councils.

We are incorporated under the *Local Government Act 1993* and are the representative body and advocate for local government in Tasmania. Where a council has made a direct submission to this process, any omission of specific comments made by that council in this submission should not be viewed as lack of support by LGAT for that specific issue.

Local government is strongly supportive of improving dog welfare outcomes however, councils are not in a position to take on additional compliance activities. We support the increased resourcing of the RSPCA and Department of Natural Resources and Environment (NRE) to more fully undertake their roles in animal welfare.

Please contact Ben Morris, Policy Director if you have any questions or would like further information, at ben.morris@lgat.tas.gov.au or 6146 3743.

Yours sincerely,

Dion Lester
Chief Executive Officer

LGAT Submission: Improving Dog Welfare Outcomes

General Comments

Local government is supportive of improving dog welfare outcomes where these changes are supported by evidence of issues. Councils have a limited role in dog welfare compliance and strongly supports the proper resourcing of the primary animal welfare regulators - RSPCA and NRE to undertake their roles. Councils are not able to take on additional compliance and enforcement responsibilities.

We note the challenge to balance regulation with guidance, particularly where there may be gaps in the practicality of enforcement. Our overall position is for clear, evidence-based reforms that are consist with other states, and supported by guidance.

We encourage further consultation with councils, animal welfare agencies, and the community through the next stages to ensure that any reforms introduced are practical, evidence-based, and cost-effective.

Theme 1 – Breeders and Breeding

Fertile female numbers within breeding enterprises

There is general support amongst councils for providing a cap on the numbers of fertile females within a breeding enterprise. We are not in a position to suggest a particular number, this should be linked to practice in other states and to animal welfare. We also note that councils are not the suitable body for monitoring ongoing compliance but will work closely with RSPCA or NRE.

Mandatory online reporting should be considered, as it places the administrative burden on the breeder and is successfully used for other activities such as fishing, bee keeping and work health and safety.

Victoria has established approval processes for breeders who wish to keep between 11 and 50 fertile female dogs and rigorous application processes, registration fees and a level of ongoing compliance.

Breeding heritable conditions

This is a complex issue. In theory the banning of breeding of dogs with heritable welfare issues that cause disease is supported. However, in practice this would require a step change in compliance, including logbooks, evidence of veterinary inspections for breeding suitability, cameras, and regular inspections by RSPCA. Dogs are bred for a variety of reasons and the regulations must reflect this. For example, show breeds may accentuate certain attributes, whereas working dogs will be bred for ‘work’ attributes and stamina over appearance. We understand that Queensland, Western Australia and Victoria have regulations regarding preventing dogs breeding with heritable defects that may cause disease.

Larger scale breeding operations

There needs to be a risk-based approach that reflects the potential magnitude of harm. This could be a sliding scale – the larger the operation, the high level of compliance requirement (inspections, reporting) and accordingly the level of penalty that is applied.

Other issues

Consideration should be given for how very small-scale breeders (1-2 fertile bitches) can be managed for animal welfare outcomes, as they appear to fall through the gaps in regulation.

Theme 2 – Identification, Tracing and Licensing

Microchipping of puppies

We support consistency with other states and territories. There may be merit in lowering this to 8 weeks ahead of re-homing to allow more efficient returning. However, local government is not in a position to enforce compliance.

To ensure usefulness of microchipping we suggest amendment to the *Dog Control Act 2000*, requiring owners to update microchip details alongside the requirement to notify the General Manager of the relevant council, within 14 days of taking possession of a dog.

Should councils consider extra welfare requirements for dogs in group situations

There is general support for councils to consider additional welfare requirements in their licencing. However, the onus/requirement should be on the proponent to demonstrate compliance, rather than additional council compliance. For example, there could be 3rd party review, similar to building surveyors that could be provided for a fee by RSPCA, or a statewide dog association. Councils do not have the appropriate training or resources to undertake this role.

Information sharing

Local government supports information sharing between councils and animal welfare regulators in Tasmania and, where necessary interstate. This may be best supported through a State Government-managed register.

Identification of breeders

Local government supports a central register for dog breeders where privacy and security can be assured.

Theme 3 - Handling, Management and Containment

Councils are supportive of ensuring dog welfare through appropriate handling, management and containment. They noted that these matters are very difficult to enforce under regulation and acknowledged the importance of having welfare principles in regulation that are supported by guidelines.

Training techniques

We do not have a view on the appropriateness of the training guidelines but note that these must always be backed by robust evidence.

Use of electric collars

Councils have noted that electric collars can be a useful training tool where appropriately used. There was not support for banning electric collars, rather guidance and communicating with purchasers of these products on their correct use and potential for harm.

Tethering

The wording in the *Animal Welfare (Dogs) Regulations 2016* is clear, however it is very difficult to enforce, limiting its usefulness. Additional details could be provided in the guidelines around appropriate use of tethering.

Theme 4 – Facilities, Housing and Sleeping

In general, the requirements are seen as adequate. There was support for greater clarity on cleaning and hygiene in enclosures and bedding.

Theme 5 - Transport

We do not provide a view on this theme, as it outside the local government's operating environment.

Theme 6 - Exemptions

There is support for the current exemptions to be removed. This will require close consultation with currently exempted groups to avoid unnecessary burdens.