



20th February 2018

Ms Alexandra Krummel  
Acting Director, Pets and Animal Welfare |  
Animal Welfare and Regulatory Policy  
Department of Economic Development, Jobs, Transport and Resources

Via email: [Alexandra.krummel@ecodev.vic.gov.au](mailto:Alexandra.krummel@ecodev.vic.gov.au)

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Dear Alex

### **Supporting Amendments to the Domestic Animals Regulations 2015**

Thank you for the opportunity to comment of the proposed regulatory amendments in the areas of commercial dog breeding approval, applicable organisations approval, dog obedience training organisation approval, animal sales permits and declared bird organisations.

#### Declared bird organisations

AVA supports the proposed amendments.

#### Dog obedience training organisation approval

AVA supports the proposed amendments.

#### Applicable organisations

AVA supports the proposed amendments with the following amendments -

- 5th bullet point should read number of dogs or cats that are owned by members or the organisation
- 12th bullet point is a duplicate of 9th bullet point.

#### Animal sales permits

AVA supports the proposed fee for commercial organisations of 12 fee units. We would prefer to see a nominal fee (1 fee unit) applied to not for profit organisations. The reason for this is that it gives the permit a perceived value and implies the connection between fees and responsibility.

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### Commercial dog breeding approval

- We note that a renewal fee is not advised. If there is to be a fee each time the same organisation applies, this should be included in the regulations
- If the facility is required to submit complaints to the Minister in their annual report, we recommend that only complaints submitted electronically or by hardcopy to the facility be required
- The minimum employee qualifications state that each employee must complete the DEDJTR Breeding Dogs and Cats in Victoria e-learning course. We are advised by Banksia Park Puppies that they have intellectually disabled staff that would not be capable of completing this course. These particular staff have responsibilities that include walking, patting and socialising the dogs – they have no responsibility for nutrition or healthcare of the dogs. We would like to see exemptions to completing this course for staff with special needs/circumstances (provided they are not responsible for nutrition or healthcare of the dogs).

### **AVA Contacts**

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