



NSW Breeding Code

NSW Department of Primary Industries and
Regional Development

Submission of the
Australian Veterinary Association Ltd

May 2026

ava.com.au

About the Australian Veterinary Association (AVA)

The AVA is the peak professional body representing veterinary professionals and students across Australia. For more than 100 years we have been the united voice of the veterinary profession.

Veterinarians are among Australia's most trusted and respected professionals, dedicated to safeguarding animal health and welfare and supporting the communities they live in.

Our vision and purpose

Vision *A thriving veterinary profession*

Purpose *Building a vibrant future for veterinary professionals.*

At the AVA we champion the veterinary community, advance professional excellence, foster connectivity, and deliver exceptional member experiences to achieve our vision of a thriving profession.

Essential role of the veterinary profession

Veterinary services are essential to Australia's animal health, food security, and economy. They help secure Australia's animal health and livestock supply chain, protecting hundreds of thousands of jobs and easing cost of living pressures through a safe and reliable food supply.

Beyond agriculture, veterinarians support companion animals and their owners, strengthening the human-animal bond and promoting the associated mental and physical health benefits of pet ownership. Animals are not just a part of the Australian way of life; they are deeply embedded in it - socially, culturally, environmentally, and economically, and veterinarians are an essential part of every vibrant Australian community.

Veterinarians play a pivotal role in maintaining the social licence of animal industries, ensuring animal health and welfare meets community expectations. Like human healthcare and education, veterinary services provide both private benefits to individuals and critical public benefits to society, in areas like biosecurity surveillance, wildlife treatment and health and emergency animal disease management.

Recognised among Australia's most ethical and trusted professionals, veterinarians are highly respected and trusted members of their communities. The Governance Institute of Australia's 2025 Ethics Index ranked veterinarians among the nation's top 5 ethical occupations¹.

¹ [Governance Institute 2025](#)



Executive Summary

The Australian Veterinary Association (AVA) welcomes the opportunity to provide targeted feedback on the proposed changes outlined in the NSW DPIRD draft consultation document for the Breeding Code.

The AVA has identified several aspects of the proposed amendments which would benefit from improved clarity, consistency and technical precision, these include the need for clearer and more consistent definitions and greater specificity in requirements that relate to animal welfare, housing, environmental management, health and nutrition.

The submission emphasises that key concepts underpinning welfare outcomes must be clearly articulated, technically accurate and informed by veterinary expertise so requirements are proportionate, evidence-based and capable of being consistently applied across diverse breeding contexts.

Recommendations are provided to support effective implementation and compliance to strengthen animal welfare outcomes.

Discussion

Definitions

Brachycephalic

This is noted to be *“removed as not required”*.

Recommendation

As the term remains in the Guidelines at 6.2.2.1, it requires a definition.

Puppies, kittens

Recommendation

Where wording through the document relates to; puppies, kittens - this needs to be consistent where used, and/or a definition provided for the age of a dog or cat to be classified as a puppy or kitten.

Parvovirus means a virus which causes intestinal inflammation in infected dogs, with signs including vomiting, diarrhoea, high fever, and dehydration

Recommendation

This is the definition for “Canine parvovirus”, noting that “parvovirus” can occur in other animal species.



Animal Housing

6.2. 1 Environment Standards

6.2.1.6 Exemption holders must ensure that environmental temperature is controlled to minimise distress to dogs, including the provision of heating or cooling, particularly for old, young, brachycephalic and pregnant animals

Recommendation

More specific information is required as to what constitutes acceptable environmental conditions, including how this will be assessed for compliance. Information contained in the following AVA policies could be used to inform this Standard:

[Animal shelters and municipal pound](#)

[The responsible ownership of dogs and cats and the human–animal bond](#)

Food and Water

7.2.1 Standards

7.2.1.11 Exemption holders must ensure that puppies from four to six months of age are offered a sufficient amount of a balanced and complete diet, at least twice daily.

7.2.2 Guidelines

7.2.2.5 With the exception of exemption holders (see standard 7.2.1.11), puppies from four to six months of age should be offered a sufficient amount of a balanced and complete diet at least twice daily. All cat breeders should offer kittens from four to eight months of age, a sufficient amount of a balanced and complete diet at least twice daily.

Recommendation

As early nutritional management influences gut microbiota development, immune function, and adult health outcomes, information is required for the nutritional requirements of puppies and kittens under 4 months of age. The following wording should be included for 7.2.1.11 and 7.2.2.5:

Veterinary guidance must be obtained to inform around nutrition requirements during and following weaning, noting that the age of weaning can be variable due to a number of factors.

All breeders must obtain veterinary advice to develop and monitor nutrition protocols tailored to their animals based on current evidence-based advice. This includes assessment of initial colostrum intake, growth curves, weaning readiness, and any supplemental feeding. Records of feeding, weights, and veterinary consultations should be maintained.



References

WSAVA: <https://wsava.org/global-guidelines/global-nutrition-guidelines/>

Husbandry of the Neonate: <https://pmc.ncbi.nlm.nih.gov/articles/PMC7151968/>

Environmental Risk Factors in Puppies/Kittens:
<https://www.frontiersin.org/journals/veterinary-science/articles/10.3389/fvets.2022.944821/full>

Canine Neonatal Health: <https://doi.org/10.1016/j.cvsm.2023.05.008>

Neonatal/Pediatric Care of Puppies/Kittens:
https://cdn.ymaws.com/www.therio.org/resource/collection/945EB82B-FABE-487E-BF95-DE44D8A9BBBB/2008_384.pdf

Weaning in dogs:
<https://www.sciencedirect.com/science/article/abs/pii/S0168159196010441>

Factors Affecting Gut Microbiota of Puppies: <https://www.mdpi.com/2076-2615/13/4/578>

Merck <https://www.msdrvvetmanual.com/management-and-nutrition/management-of-the-neonate/management-of-the-neonate-in-dogs-and-cats>

Breeding and Rearing

10.1.2 Guidelines

10.1.2.5 Dogs and cats which are well socialised to human adults and children and with other animals will become well-adjusted companions. The best opportunity to socialise dogs to humans and other animals is before twelve weeks of age. For cats, socialisation to humans and other animals is best achieved before seven weeks of age.

Recommendation

The AVA recommends replacing 10.1.2.5 with the following wording:

Dogs and cats that are well socialised to human adults, children, and other animals are more likely to become confident, well-adjusted companions. Breeders and owners must implement a deliberate program of positive social and environmental exposure, with the most effective period for puppies before 12–14 weeks of age (ideally starting by 3–5 weeks) and for kittens before 9 weeks of age (ideally starting by 3–4 weeks). This should include non-threatening experiences with people, animals, handling, transport, and everyday stimuli. Responses must be monitored and the program adapted to prevent fear, with ongoing social reinforcement throughout life.

References

[Puppy and kitten socialisation and habituation](#)

<https://www.avma.org/sites/default/files/2024-09/avma-lit-review-socialization-puppies-kittens-0924.pdf>



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