

13 February 2026

Dog and Cat Management
Department for Environment and Water

By email: DEW.DogAndCatReform@sa.gov.au

Dear Minister

Dog and Cat Management (Breeder Reforms): Standards, Guidelines and Regulations

1. We refer to consultation on YourSAy entitled *Breeder Reforms: Standards and Guidelines, Limits and Regulations for dog and cat breeders*.
2. The Law Society has a particular interest in the draft Dog and Cat Management (Breeder Reforms) Amendment Regulations 2025 and the draft *Standards and Guidelines for Breeding Dogs and Cats 2026*, having provided a submission dated 14 June 2004 on the *Dog and Cat Management (Breeder Reforms) Amendment Act* which updated the *Dog and Cat Management Act 1995*.
3. We note that the Regulations, Standards and Guidelines are intended to support implementation of the breeder licensing scheme and establish minimum standards for the management of animals within breeding programs.
4. The draft *Standards and Guidelines for Breeding Dogs and Cats* follow a format of various Standards each supported by a set of Guidelines. Standards are the minimum requirements that must be met under law, and failure to meet a Standard may result in an expiation notice or prosecution under the *Dog and Cat Management Act 1995*. Guidelines provide recommendations on how to achieve the required standards and are not mandatory.
5. This submission was prepared with assistance of the Society's Animal Law Committee.
6. The Society considers that the proposed cap of 50 fertile breeding females per premise (as set out in 2.2 Definitions) is far too high. The Society's Animal Law Committee recommends reducing this to a limit of 20 fertile breeding females (at most) per premise and 50 per operation.
7. In relation to caesarean limits at Standard 5.6.10, the current proposal requires females to be retired from breeding after three caesareans. The Society notes that in the UK the caesarean limit is two (see Schedule 6(6)(3)(d) of the [Animal Welfare \(Licensing of Activities Involving Animals\) \(England\) Regulations 2018](#)). The Society's Animal Law Committee recommends adopting this limit of two.
8. The Society suggests that consideration be given to expanding the provision under which individuals are disqualified from being granted a breeder licence, to include offences relating to fraud and/or domestic violence.
9. The Society observes that the Guideline 5.1.2 suggests breeders consult with a veterinarian when creating or reviewing the facility's Animal Health Management Plan, however this is not enforceable. Given that breeders are not required to have breed-specific knowledge or expertise, the Society considers it more appropriate for this to be included in the Standards to ensure that Animal Health Management Plans are always adequate and appropriate.



The Law Society
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10. The Society notes that Standard 3.3.2 requires licensed breeders to comply with any education requirements set as a condition of their breeder licence, with education requirements at the discretion of the Board. The Society notes that mandating training across the industry was supported by 61% of respondents to the consultation process, and considers this appropriate.
11. The Society considers that Guidelines relating to breeding and inheritable defects/breed characteristics (Guidelines.6.5 - 5.6.8) should be mandatory Standards rather than Guidelines, as inheritable defect problems can be widespread in the community.
12. The Society observes that the *Dog and Cat Management (Breeder Reforms) Amendment Regulations 2025* remove the option for an extension to be granted to the time limit for a dog or cat to be microchipped or desexed post sale (28 days). While the removal of the extension option might be appropriate for microchip requirements, in relation to desexing it necessarily means that all puppies sold at 8 weeks old will be desexed at 12 weeks old, regardless of their breed. Some vets recommend that large breed dogs not be desexed until 12-24 months of age, to prevent joint issues and ensure proper bone growth. The Society therefore recommends that the extension provision be retained in the case of desexing.
13. The Society notes that Standard 5.3.6 states: "Animals over 4 months of age must be provided with food at least once daily". The Society recommends that this Standard be amended to "at least twice daily" noting that 4 months of age is too young to be fed only one meal per day.
14. In addition, Guideline 5.3.5 states that puppies and kittens between 4-6 months "should" be offered food twice daily. The Society considers that this should be a Standard rather than a Guideline. The Society additionally notes that the NSW Animal Welfare Code of Practice S7.1.4 requires feeding twice daily for pups up to 6 months and kittens up to 8 months.

Please feel free to contact me if you have any queries.

Yours sincerely



David Colovic
President