

DOMESTIC ANIMALS REGULATION AMENDMENT 2019

ENGAGEMENT REPORT



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Purpose

This report summarises consultation on proposed amendments to the Domestic Animals Regulations 2015 (DA Regulations) undertaken in February 2019. It analyses feedback received from stakeholders and provides a summary of amendments made to the proposed regulations following public consultation.

Introduction and background

On 20 December 2017, the *Domestic Animals Amendment (Puppy Farms and Pet Shops) Act 2017* (PFPS Act) received Royal Assent. The PFPS Act inserts new Part 5C into the *Domestic Animals Act 1994* (DA Act) to create the Pet Exchange Register (PER). As a result of these amendments, changes to the DA Regulations are required.

In April 2018, targeted consultation informed initial amendments made to the DA Regulations, however a second set of amendments is required to support the PER's commencement from 1 July 2019. This also provides an opportunity to make further amendments to clarify aspects of the DA Regulations and build on the work completed in 2018.

Public consultation was undertaken from 1 February 2019 to 1 March 2019 on the proposed amendments to the DA Regulations. Animal Welfare Victoria has summarised the stakeholder feedback from this consultation process and provided responses to issues raised. The final draft amendments to the DA Regulations have been revised in response to feedback received during the consultation process.

Consultation process

To ensure stakeholders were appropriately consulted on the proposed amendments to the DA Regulations, Animal Welfare Victoria conducted a staged engagement process. This involved first presenting the proposed amendments to the Domestic Animals Working Group (see below), followed by a public survey on the Engage Victoria platform. Stakeholders and the general public were informed of the opportunity to have their say on the proposed amendments via email and Animal Welfare Victoria's Facebook page.

While public consultation was underway, Animal Welfare Victoria engaged with other areas of government on the proposed amendments and the operation of the DA Regulations.

Regulatory Impact Statement and consultation requirements

Following consideration of the amendments to the DA Regulations and anticipated impacts, and advice from the Office for the Commissioner for Better Regulation, the Minister for Agriculture determined that the proposed amendments did not reach the significant burden threshold.¹ This meant that a Regulatory Impact Statement (RIS) was not required for the proposed amendments. This exemption is allowed for under section 8(1)(a) of the *Subordinate Legislation Act 1989* (SL Act).

While a RIS was not required, the SL Act's requirements for consultation still need to be met. Under the SL Act consultation is to occur with any affected party. As the PER affects the general public, a broad scale consultation approach was required. A survey through Engage

¹ The Victorian Guide to Better Regulation states that a significant burden is equivalent to \$2 million.



Victoria, the government's online consultation platform, was undertaken to meet this requirement.

Domestic Animals Working Group

The Domestic Animals Working Group is a representative group that facilitates collaboration between key domestic animal management stakeholders in Victoria. Meetings provide a forum to discuss support and guidance materials to improve domestic animal management and welfare outcomes.

This group comprises representatives from:

- local councils
- the Royal Society for the Prevention of Cruelty to Animals (RSPCA) (Victoria)
- Municipal Association of Victoria
- Dogs Victoria
- Greyhound Racing Victoria
- Central Animal Records.

As the key representative group on domestic animal management, the amendment proposals were first presented to the Domestic Animals Working Group. Members of the group examined and discussed the proposals and submitted comments.

Where appropriate changes were made to the proposed amendments to the DA Regulations prior to releasing the proposals for public consultation on Engage Victoria. (It is noted that some of these groups also made submissions during the public consultation process.)

Engage Victoria

Engage Victoria is the Victorian Government's online consultation platform. The site offers an additional, digital way for the public to participate and to have a say in the development of government policies and programs. Engage Victoria has significant reach across the Victorian public.

The opening of the consultation process was advertised on the Animal Welfare Victoria Facebook page. Potential respondents were notified of the opportunity to comment on the proposed amendments via email. This email reached approximately 4,500 potential respondents. Those notified included key stakeholder groups including industry groups, domestic animal businesses, community foster care networks, veterinarians and individuals who had signed up for animal welfare alerts.

Engage Victoria was used to host a survey on each of the proposed amendments. For each proposed amendment, respondents were asked if they agreed, disagreed, were undecided or if the change was irrelevant to them. Respondents were given the opportunity to write comments in addition to their survey question answers.

A total of 376 responses from 363 contributors were received through the Engage Victoria survey. The final survey results are included at **Appendix 1**.

Submissions

A limited number of organisations submitted written submissions directly to Animal Welfare Victoria. Direct submissions were received from RSPCA Victoria, the Australian Veterinary Association (Victorian branch), the Feline Control Council of Victoria and Banksia Park Puppies. While not received directly through the public consultation process, these submissions have been considered and included in this report.

Key consultation themes

The survey results and submissions received varied in support of the proposed amendments and some respondents suggested changes to the amendments. Below is a list of key themes from the consultation. It is not a comprehensive list of all proposals recommended, but a summary of the key themes and issues raised.

Where appropriate, these key issues have been addressed through changes to the proposed regulations amendments (see the next section for detail).

Applicable organisation members

Half of all submissions received through Engage Victoria came from members of applicable organisations.²

Applicable Organisation members may hold up to 10 fertile female dogs or cats before being required to register as a domestic animal business with local council. The organisations regulate their members that breed, and as such are responsible for taking disciplinary action against members who do not comply with the organisation's code.

A significant number of respondents who identified as an applicable organisation member did not agree with any of the proposed amendments. It is unclear whether this was general disagreement with the specific amendments, or the legislated requirement to enrol onto the PER. Animal Welfare Victoria had received feedback previously during the finalisation and passage of the PFPS Act, and subsequent public forums, that members did not want register with the government.

However, respondents that identified as applicable organisation members were supportive of:

- specifying a timeframe for updating change of ownership details in a microchip record
- revising the pet shop record keeping requirements to include keeping the source number of a registered shelter or pound or voluntarily enrolled foster carer.

Animal Welfare Victoria analysed survey data distinguishing between those who identified as applicable organisation members and those that did not. A breakdown of the difference in responses is at **Appendix 2**.

Pet Exchange Register (PER)

PER requirements

Operation of the PER, including who is required to enrol, has already been established in legislation. Changes to these requirements cannot be made through regulation amendments.

² The Minister for Agriculture may approve applicable organisations. In Victoria there are five Applicable Organisations:

- Dogs Victoria
- Australian National Cats Inc., Cats Victoria Inc.
- Feline Control Council of Victoria Inc.
- The Governing Council of the Cat Fancy Australia and Victoria
- Cats Victoria.



Twenty-three per cent of all respondents chose 'not agree' for all the proposed regulatory changes associated with the PER. Many of the comments from respondents indicate that they disagree with a register entirely. There was considerable number of respondents that answered not agree to all proposed regulatory changes for the PER. Of those that answered not agree to every question 87.5 per cent of those responding not agree to all proposed regulatory changes for the PER were members of applicable organisations.

Some respondents to the survey expanded their responses to include issues that could only be change through legislative amendment, which is beyond the scope of the DA Regulations. A few of the issues raised are set out below with responses provided.

- Issue: not all domestic animal businesses are included on the PER.
Response: local councils will enrol all domestic animal business – including registered pet shops, pounds and breeders of cats and dogs – on the PER.
- Issue: applicable organisations should enrol members on the PER rather than recreational breeders being required to self-enrol on the PER to.
Response: during the development of the PFPS Act, applicable organisations informed the government that they were unable/unwilling to enrol members.
- Issue: there are too many information requirements for enrolling on the PER.
Response: minimum information requirements are set out in the PFPS Act.

It appeared that many respondents misunderstood requirements of the PER, and/or the requirements for dog breeders applying to the Minister for Agriculture to be an approved commercial dog breeder. Comments received indicate a misunderstanding that commercial dog breeder approval application requirements are a PER requirement for everyone who bred dogs – this is not the case. Commercial dog breeder approval application requirements only relate to those breeders applying to to keep 11-50 relevant fertile female dogs.

While Animal Welfare Victoria provided detailed documents on Engage Victoria, including a glossary and the rationale for each proposal to assist respondents in understanding the amendment proposals, and was available to assist people completing the survey on the phone or via email, further education and information will be provided on the requirements of the PFPS Act.

Action: further communication about the PER requirements will be developed and released prior to its commencement.

Heritable defects

While there was over 40 per cent agreement with requiring the inclusion of known heritable defects when registering a breeding animal on the PER, there were strong arguments against the proposal. Respondents were concerned that breeders will reduce the amount of testing done for their animals to avoid reporting requirements. This may negatively impact animal welfare.

All breeders will continue to be required to abide by the Code of Practice for the Breeding of Animals with Heritable Diseases as required by the *Prevention of Cruelty to Animals Act 1986*.

Action: proposal to include heritable defects will be removed from the amendment regulations.

Fees

There were mixed views on the application fee for the PER. While a few submissions considered the fee was reasonable, many respondents did not want to pay a fee, as they already pay fees to voluntary industry groups (such as Dogs Victoria) and local council.

There was a request for a reduced fee for pension or health care card holders.

Action: Animal Welfare Victoria is exploring fee options.

Linking of microchips and source numbers

There was a large discrepancy in responses between those who were applicable organisation members and those who were not. Responses from members of applicable organisations included requests that a breeder's member number be used in advertisements instead of a source number. However, the PFPS Act sets the requirement for the inclusion of a source number.

Microchip implanters were extremely supportive of the change. Several responders raised that exemptions may need to be considered where a dog or cat's breeder is unknown (i.e. adult dog).

Action: proposal will be amended to allow for when a breeder cannot be identified.

Commercial Dog Breeding Approvals

There was limited support for changing the requirement for a health management plan per dog, to one per breed of dog. The comments however, were mixed between wanting a plan per dog and wanting one plan per business. The proposal for one plan per breed sits in between these two strong positions reflected in the 'not agree' respondents.

No resulting action.

Changes to the proposed amendments to the DA Regulations

Animal Welfare Victoria has revised several of the proposed amendments to the DA Regulations in response to feedback received through consultation including other areas of government. These proposed amendments will be considered by the Government.

Below is a snapshot of the final proposed amendments to the DA Regulations.

Pet Exchange Register

Original Proposal	Change to proposal	Rationale for change
New requirement for all breeders to include details on the PER of any known heritable defect.	Agreed to remove proposal.	Feedback indicated that the original proposal would increase confusion on current requirements and could negatively impact animal welfare. It is noted that all breeders will continue to be required to abide by the Code of Practice for the Breeding of Animals with Heritable Diseases as required by the <i>Prevention of Cruelty to Animals Act 1986</i> .
New requirement for all recreational breeders and microbreeders to provide their date of birth when enrolling on the PER.	Agreed to amend proposal to include all people applying for a source number.	Identification verification cannot occur without a date of birth.
New requirement for local councils to provide compliance and registration data for domestic animal businesses.	Agreed to amend proposal to expand and clarify data required.	The list proposed was not extensive, and further documentation will assist local councils, RSPCA (Victoria) and Animal Welfare Victoria.
Set PER application fee set at 1.5 fee units.	TBC – fee options are being explored.	Feedback noted that the introduction of a fee is a significant change for the industry.
New requirement for recreational breeders and microbreeders to provide evidence to verify their	No change agreed.	NA.

identify when applying on PER.		
Expand reasons for Secretary to refuse, suspend or revoke a source number to include if identification cannot be verified.	No change agreed.	NA.
Expand reasons for Secretary to refuse, suspend or revoke a source number to include if a recreational breeder's application organisation membership is no longer valid.	No change agreed.	NA.

Microchips

Original Proposal	Change to proposal	Rationale for change
The source number of the breeder must be included on the record when microchipping any animal born after 1 July 2020.	Agreed to amend proposal to provide for when a breeder cannot be identified and allow for it to be the first microchipping owner (e.g. shelter pound or Community Foster Care Network).	Feedback indicated that situations may occur where a breeder of a dog or cat cannot be identified.

Allow a veterinarian to remove a microchip from an animal in cases where identity must be protected for personal safety reasons, or if ordered by a court.	Agreed to amend proposal to only allow the removal of a microchip when ordered by a court.	Feedback indicated that there was a preference for microchips to only be removed from a dog or cat if ordered by a court.
When a change of ownership or details application is made the registry must make those changes within seven business days.	No change agreed.	NA.
When an animal is presented to have a second microchip implanted, the registry is to give a departmental authorised officer the information required to follow-up.	No change agreed.	NA

Sale and breeding of animals

Original Proposal	Change to proposal	Rationale for change
Update pet shop record keeping requirement to be updated to include the source number of the shelter, pound or foster carer the animal has been sourced from.	No change agreed.	NA.

Update pet shop record keeping requirement to remove requirement to record dog or cat breeders' details.	No change agreed.	NA.
Remove the requirement for a health management plan for each dog and replace with a health management plan for each breed of dog and specified dog details for each breeding dog.	Agreed to amend proposal to require specified dog details of all dogs on the property.	NA. To ensure that all dogs on the property are captured included.
Amending reporting requirements including the provision of specified dog details of each breeding dog.	Agreed to amend proposal to require specified dog details for all dogs on the property.	Traceability, as it will ensure that all dogs on the property are included.
Expand reporting requirements to include any amendments made by businesses to their policies and procedures already submitted.	Agreed to amend proposal to require annual veterinary agreement and up to date public liability insurance in the annual report to the Minister.	Improved alignment of requirements under the DA Act and DA Regulations to ensure that conditions of being an approved commercial dog breeder are being met.
Amendment to expand conditions on animal sale permits.	No change agreed.	NA.

New amendment

Proposal	Rationale
Change the reporting timeframe of commercial dog breeders to be in a timeframe set by the Minister as opposed to the previous financial year.	Further internal consultation demonstrated a need for further regulatory amendments. As approvals can happen at any time of the year, a set timeframe for an annual report is not practical.

Next Steps

Following feedback from this consultation process, documentation will be prepared for the making of the amendment regulations.

Appendix 1: Engage Victoria – snapshot of results

All feedback relating to the DA Regulations has been taken into consideration.

Survey participants

	Total
Number of contributions	376
Number of contributors	363

Respondent	Percentage	Count
Applicable Organisation member	50%	188
Breeder of dogs	39.63%	149
Breeder of cats	3.19%	12
Microchip implanter	8.51%	32
Employee/owner of a microchip registry	1.06%	4
Local council officer	6.91%	26
Employee of the Royal Society for the Prevention of Cruelty to Animals	0.8%	3
Advertiser of cats or dogs	10.11%	38
Interested member of the public	35.37%	133
Industry group or representative body	4.52%	17
Member of a Community Foster Care Network	7.71%	29
Prefer not to say	4.26%	13
Other	13.03%	49

Survey results – all responses

Part 1 – Pet Exchange Register

1. Do you agree with the proposed additional details to be required by the DA Regulations?				
	Agree	Not Agree	Undecided	Not relevant to me
a. All breeders to include details on the PER of any known heritable defect. (refer to glossary for list of defects)	41.3%	53.04%	3.6%	2.02%
b. All recreational breeders and microbreeders to include their date of birth to ensure identity can be verified.	52.27%	43.2%	3.73%	0.8%
c. Council to include compliance and registration data for Domestic Animal Business records (which only those authorised can view).	43.16%	44.24%	8.31%	4.29%
2. Do you agree with the proposed additions to the DA Regulations to prescribe the following?				
	Agree	Not Agree	Undecided	Not relevant to me
a. Fee to apply for a source number on the PER to be set at 1.5 fee units (equivalent to \$21.76 as at 1 July 2018).	35.2%	53.87%	9.6%	1.33%
b. Evidence to verify identify (e.g. a driver's licence).	54.28%	40.91%	3.48%	1.34%

3. Do you agree with the following proposed reasons for refusal, revocation or suspension?

	Agree	Not Agree	Undecided	Not relevant to me
a. Identification cannot be verified.	58.06%	34.14%	6.72%	1.08%
b. A recreational breeder's applicable organisation membership is no longer valid.	51.62%	41.08%	5.95%	1.35%

Part 2 – Microchips

4. Do you agree that the following information also be required for a record associated with a microchip?				
	Agree	Not Agree	Undecided	Not relevant to me
a. The source number of the breeder must be included on the record when microchipping any animal born after 1 July 2020.	52.15%	41.94%	5.65%	0.27%
5. Do you agree with the following changes proposed to the requirements on microchip registries within the DA Regulations?				
	Agree	Not Agree	Undecided	Not relevant to me
a. Allow a veterinarian to remove a microchip from an animal in cases where identity must be protected for personal safety reasons, or if ordered by a court.	26.14%	60.58%	9.96%	3.32%
b. When an animal is presented to have a second microchip implanted, the registry is to give a departmental authorised officer the information required to follow-up. (Instead of to the original microchip owner).	42.4%	20.27%	35.47%	1.87%
c. When a change of ownership or details application is made the registry must make those changes within seven business days.	78.93%	12.53%	7.73%	0.8%

Part 3 – Sale and breeding of animals

6. Do you agree with the proposed changes to the DA Regulations?				
	Agree	Not Agree	Undecided	Not relevant to me
a. Include a requirement to keep the source number of the shelter, pound or foster carer the animal has been sourced from.	67.91%	7.75%	3.48%	20.86%
b. Remove the requirement to have breeders' details recorded, as it is no longer relevant. Since pet shops cannot source dogs or cats from breeders.	40.05%	25.34%	13.35%	21.25%
7. Do you agree with the following proposed changes to the DA Regulations to the application and reporting process for commercial dog breeders?				
	Agree	Not Agree	Undecided	Not relevant to me
a. Remove the requirement for a health management plan for each dog and replace with a health management plan for each breed of dog and specified dog details for each breeding dog.	31.55%	46.52%	12.83%	9.09%
b. Replace the requirement for a whole of life plan in an approved commercial dog breeder's annual report with specified dog details of each breeding dog kept on the property.	37.6%	21.87%	29.07%	11.47%
c. Expand reporting requirements to include any amendments made by businesses to their policies and procedures already submitted.	48.26%	10.99%	29.76%	10.99%

8. The specified details to be provided for each dog are to include:

	Agree	Not Agree	Undecided	Not relevant to me
i. Name of dog	48.38	40.81%	5.95%	4.86%
ii. Sex of dog	%			
iii. Breed of dog				
iv. Colour of dog				
v. Status of dog (e.g. entire)				
vi. Birth date				
vii. Date acquired				
viii. Date of last vaccination and worming				
ix. Female dog details:				
a. Date of mating and birthing				
b. Mating male/s – name, microchip and breed of dog				
c. Litter number				
d. Number of live births				
e. Date of breeding clearance certificate				
f. Date of last general health check				
x. Male dog details:				
a. Date of mating				
b. Mating female/s – name, microchip and breed of dog				
c. Date of breeding clearance certificate				
d. Date of last general health check				
e. Retirement date				
f. Method of disposal				

9. It is proposed the following conditions are prescribed in the DA Regulations:

	Agree	Not Agree	Undecided	Not relevant to me
a. The permit holder must ensure that an emergency evacuation plan is displayed at all times.	48.92 %	22.43%	28.65%	-
b. The permit holder or nominee must be able to produce the permit at the sale when requested by an authorised officer.	58.42 %	16.58%	25%	-

Appendix 2: Engage Victoria – applicable organisation responses and non-applicable organisation responses

Survey results

Part 1 – Pet Exchange Register

1. Do you agree with the proposed additional details to be required by the DA Regulations?									
	Agree		Not Agree		Undecided		Not relevant to me		
	AO	Non-AO	AO	Non-AO	AO	Non-AO	AO	Non-AO	
a. All breeders to include details on the PER of any known heritable defect. (refer to glossary for list of defects)	15.15%	70.69%	80.30%	21.55%	3.79%	3.45%	0.74%	3.45%	
b. All recreational breeders and microbreeders to include their date of birth to ensure identity can be verified.	27.27%	77.12%	67.91%	18.62%	4.81%	2.13%	0%	1.6%	
c. Council to include compliance and registration data for Domestic Animal Business records (which only those authorised can view).	19.89%	66.31%	67.20%	21.39%	6.45%	10.16%	6.45%	2.14%	

2. Do you agree with the proposed additions to the DA Regulations to prescribe the following?

	Agree		Not Agree		Undecided		Not relevant to me	
	AO	Non-AO	AO	Non-AO	AO	Non-AO	AO	Non-AO
a. Fee to apply for a source number on the PER to be set at 1.5 fee units (equivalent to \$21.76 as at 1 July 2018).	14.97%	55.32%	78.07%	29.79%	5.88%	13.30%	1.07%	1.6%
b. Evidence to verify identify (e.g. a driver's licence).	31.02%	77.54%	64.17%	17.65%	4.28%	2.67%	0.53%	2.14%

3. Do you agree with the following proposed reasons for refusal, revocation or suspension?

	Agree		Not Agree		Undecided		Not relevant to me	
	AO	Non-AO	AO	Non-AO	AO	Non-AO	AO	Non-AO
a. Identification cannot be verified.	38.71%	77.42%	51.87%	16.19%	8.02%	5.19%	1.07%	1.08%
b. A recreational breeder's applicable organisation membership is no longer valid.	30.81%	72.43%	60.96%	18.92%	5.88%	5.95%	1.60%	1.08%

Part 2 – Microchips

4. Do you agree that the following information also be required for a record associated with a microchip?									
	Agree		Not Agree		Undecided		Not relevant to me		
	AO	Non-AO	AO	Non-AO	AO	Non-AO	AO	Non-AO	
a. The source number of the breeder must be included on the record when microchipping any animal born after 1 July 2020.	28.64%	75.40%	65.95%	18.18%	5.41%	5.88%	0%	0.53%	
5. Do you agree with the following changes proposed to the requirements on microchip registries within the DA Regulations?									
	Agree		Not Agree		Undecided		Not relevant to me		
	AO	Non-AO	AO	Non-AO	AO	Non-AO	AO	Non-AO	
a. Allow a veterinarian to remove a microchip from an animal in cases where identity must be protected for personal safety reasons, or if ordered by a court.	11.54%	43.24%	80%	37.84%	6.15%	13.51%	1.54%	5.41%	
b. When an animal is presented to have a second microchip implanted, the registry is to give a departmental authorised officer the information required to follow-up. (Instead of to the original microchip owner).	22.46%	62.23%	22.46%	62.23%	51.87%	19.15%	0.53%	3.19%	



c. When a change of ownership or details application is made the registry must make those changes within seven business days.	78.61%	79.26%	13.90%	11.17%	6.95%	8.51%	0.53%	1.06%
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Part 3 – Sale and breeding of animals

6. Do you agree with the proposed changes to the DA Regulations?									
	Agree		Not Agree		Undecided		Not relevant to me		
	AO	Non-AO	AO	Non-AO	AO	Non-AO	AO	Non-AO	
a. Include a requirement to keep the source number of the shelter, pound or foster carer the animal has been sourced from.	53.76%	81.91%	8.065%	7.45%	4.30%	2.67%	33.87%	7.98%	
b. Remove the requirement to have breeders' details recorded, as it is no longer relevant. Since pet shops cannot source dogs or cats from breeders.	33.15%	46.77%	22.65%	27.96%	9.39%	17.27%	34.81%	8.06%	

7. Do you agree with the following proposed changes to the DA Regulations to the application and reporting process for commercial dog breeders?

	Agree		Not Agree		Undecided		Not relevant to me	
	AO	Non-AO	AO	Non-AO	AO	Non-AO	AO	Non-AO
a. Remove the requirement for a health management plan for each dog and replace with a health management plan for each breed of dog and specified dog details for each breeding dog.	20.86%	42.45%	58.60%	34.76%	8.56%	17.11%	12.30%	5.88%
b. Replace the requirement for a whole of life plan in an approved commercial dog breeder's annual report with specified dog details of each breeding dog kept on the property.	23.94%	51.37%	19.68%	24.06%	42.02%	16.04%	14.36%	8.56%
c. Expand reporting requirements to include any amendments made by businesses to their policies and procedures already submitted.	32.80%	63.64%	10.75%	11.23%	42.47%	17.11%	13.98%	8.02%

8. The specified details to be provided for each dog are to include:

	Agree		Not Agree		Undecided		Not relevant to me	
	AO	Non-AO	AO	Non-AO	AO	Non-AO	AO	Non-AO
i. Name of dog	29.26%	65.96%	57.98%	22.34%	5.32%	6.38%	5.85%	3.72%
ii. Sex of dog								
iii. Breed of dog								
iv. Colour of dog								
v. Status of dog (e.g. entire)								
vi. Birth date								
vii. Date acquired								
viii. Date of last vaccination and worming								
ix. Female dog details:								
a. Date of mating and birthing								
b. Mating male/s – name, microchip and breed of dog								
c. Litter number								
d. Number of live births								
e. Date of breeding clearance certificate								
f. Date of last general health check								
x. Male dog details:								
a. Date of mating								
b. Mating female/s – name, microchip and breed of dog								
c. Date of breeding clearance certificate								
d. Date of last general health check								
e. Retirement date								
xi. Method of disposal								

9. It is proposed the following conditions are prescribed in the DA Regulations:

	Agree		Not Agree		Undecided		Not relevant to me	
	AO	Non-AO	AO	Non-AO	AO	Non-AO	AO	Non-AO
a. a. The permit holder must ensure that an emergency evacuation plan is displayed at all times.	30.27%	67.57%	27.57%	17.30%	42.16%	15.14%	-	-
b. b. The permit holder or nominee must be able to produce the permit at the sale when requested by an authorised officer.	37.84%	79.23%	22.16%	10.93%	40%	9.84%		