



# Tasmania Dog Welfare Regulation reform

Submission of the  
Australian Veterinary Association Ltd

December 2024

## The Australian Veterinary Association

The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. Our members come from all fields within the veterinary profession. Clinical practitioners work with companion animals, horses, livestock, and wildlife. Government veterinarians work with our animal health, public health, and quarantine systems while other members work in industry, research, and teaching. Veterinary students are also members of the Association.

### AVA Statement of principles with respect to Animal Welfare

Animals are sentient beings that are conscious, feel pain, and experience emotions. Animals and people have established relationships for mutual benefit for thousands of years.

Humans have a duty of care to protect animals. Where a person does not meet his or her obligations to animals in his or her care, animals may suffer. When this happens, the law must be able to adequately intervene to enforce compliance and prevent suffering.

Animals have intrinsic value and should be treated humanely by the people who benefit from them. Owned animals should be safe from physical and psychological harm. They need access to water and species-appropriate food and shelter and should be able to fulfil their important behavioural and social needs. They must receive prompt veterinary care when required and have as painless and stress-free a death as possible.

Animals can be used to benefit humans if they are humanely treated, but the benefit to people should be balanced against the cost to the animal. They should not be used in direct combat or for purposes where suffering, injury or distress is likely to be caused.

Humans should strive to provide positive experiences to promote a life worth living for the animals in their care. We should strive for continuous and incremental improvement in the treatment and welfare of animals.

Humans have a responsibility to care for the natural environment of free-living native animals. People should take steps to preserve endangered species and protect native animals from disease where possible.



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## Summary

The AVA welcomes the opportunity to contribute to the reform of Tasmania's dog welfare regulations. The AVA's submission highlights the need for evidence-based and humane approaches to animal welfare, ensuring alignment with contemporary science and best practices.

On dog breeders and breeding, the AVA cautions against placing arbitrary limits on the number of breeding dogs, as there is no scientific evidence linking such caps to improved animal welfare. In principle support is provided for the banning of breeding dogs with heritable welfare issues, provided that this includes protocols developed in consultation with veterinarians to ensure protocols are based on evidence-based knowledge and expertise.

The AVA recommends adopting tailored breeder classifications which are not necessarily based on the size of an operation. Support is also given for harmonised microchipping requirements and enhanced traceability through a robust registration system, including mandatory breeder registration, to combat puppy farming. It is noted that regulation and enforcement of breeder registration and operations must be adequately resourced and supported.

For handling and containment, the AVA calls for evidence-based and regulated training methods, humane alternatives to electric collars, and clearer tethering regulations.

Regarding housing and facilities, the AVA emphasises aligning requirements with the [Five Domains of Animal Welfare](#), focusing on promoting positive welfare outcomes rather than merely meeting minimum standards.

On transport, the AVA advocates for consistent welfare requirements across all modes of transportation, with reference to established Guidelines.

Also included in this submission is comprehensive feedback around Standards and Guidelines found in the [Tasmanian Animal Welfare Guideline](#) document, which is referenced in the Discussion paper and interlinks with the Regulations under review.

## Discussion

Veterinarians are highly valued and trusted by the communities they serve. Their knowledge and expertise are an essential contributor to any matters relating to animal health and welfare.

The following input utilises the AVA's extensive knowledge base derived from members of the veterinary profession who have a professional interest, expertise, or are specialists in the areas of dog behaviour, reproduction and welfare.



## Theme 1 - Breeders and Breeding

### 1. Should Tasmania introduce a cap on the number of fertile bitches at a premises? If so, what do you consider would be an ideal number for a cap between 3 and 50?

The AVA cautions against using arbitrary limits on the numbers of breeding dogs allowed. There is no scientific evidence that capping a breeder to a certain number of fertile females will improve animal welfare. The number of animals kept by a breeder is not necessarily a factor that determines the welfare of those animals.

Rather than broad caps on numbers, the regulation of breeding facilities should be underpinned by robust, enforceable breeder Standards or compulsory Codes of Practice must be in place, and breeders must be government licensed, identified, traceable and independently inspected on a regular basis. Veterinarians should be involved in the development of breeder standards.

Other measurable and reportable Standards could be used; including the requirement for annual welfare checks, mandatory reporting of animal welfare concerns, maximum number of animals based on human husbandry availability and housing.

Relevant AVA Policies:

- [Puppy farming](#)
- [Animal shelters and municipal pounds](#)

### 2. What are your views on banning the breeding of dogs with heritable welfare issues?

In principle, the AVA supports banning of breeding of dogs with heritable welfare issues, particularly where the defect may lead to poor health and welfare in affected individuals. We suggest that this section would benefit from greater clarification of what the proposed legislation deems as a heritable defect, and how this would be enforced. Expert veterinary consultation is available and required to guide what are classified as heritable defects<sup>1</sup>. A protocol needs to be developed to support this proposed amendment in consultation with the veterinary profession, including veterinary geneticists.

Certain dog breeds have serious health and welfare problems because they have been bred with exaggerated features to achieve a particular look. In recent years there has been a rise in the popularity of certain breeds of dogs, especially the brachycephalic breeds, and also other breeds with exaggerated features such as dwarfism (*chondrodystrophy*) and excessive skin folds. These exaggerated features lead to serious health and welfare problems, which the veterinary community are faced with managing.

Additional heritable welfare concerns due to exaggerated features are related to the management of other heritable diseases in breeding stock (including; hip dysplasia, cryptorchidism, elbow dysplasia,

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<sup>1</sup> <https://wsava.org/committees/hereditary-disease-committee/>  
<https://wsava.org/wp-content/uploads/2022/02/Health-focused-Breeding-background-statement.pdf>  
<https://wsava.org/wp-content/uploads/2022/02/A-Response-to-the-Norwegian-Court-Ban-Against-the-Breeding-of-English-Bulldogs-and-Cavalier-King-Charles-Spaniels.pdf>



clotting factor deficiencies). The AVA would like to see a standard of responsible breeding that tests for these types of disorders conducted in animals used for breeding stock, and that animals with heritable conditions not be intentionally bred. Recommendations for testing would need to be discussed with a veterinarian. It would also be ideal for this testing to be tied into breeding licensing schemes, whereby breeders agree to have the minimum testing done of parents and puppies prior to sale.

The AVA policy on [selective breeding based on genetic testing](#) of companion animals advises that selective breeding of companion animals based on genetic tests should only occur where there have been proven phenotypic outcomes which will improve an animal's viability, conformation, health and welfare.

Companion animals should not be bred if they carry genetic disorders:

- with a high heritability, that will be detrimental to the animal's health or welfare, or
- with a low heritability, but which may severely compromise an animal's health or welfare.

Requests for genetic testing of companion animals should be directed through, and overseen by, the animal's veterinarian, so that clients can be appropriately counselled on the results.

The AVA policy on [genetic defects in domestic animals](#) provides guidance regarding animals with known genetic defects that have the potential to adversely affect their welfare or that of their progeny should not be used for breeding, other than in exceptional circumstances.

In 2016, the AVA partnered with RSPCA Australia to develop the [Love is Blind](#) campaign to raise awareness of the animal welfare issues associated with particular exaggerated features, such as brachycephalic dog breeds, and encourage breeders to change their breed standards to select for more normal, healthy features.

We recommend using the [Victorian Code of Practice for the Breeding of Animals with Heritable Defects that Cause Disease](#) as an example. Other resources are also available on this subject.<sup>2</sup>

With respect to breeding bitches, we note the comment in page 11 of the discussion paper stating:

*Significant research has been undertaken in relation to the welfare of breeding bitches since the Animal Welfare (Dogs) Regulations 2016 commenced. A review of this research indicates best practice welfare outcomes are achievable by breeding on consecutive cycles, establishing maximum litter numbers and determining breeding age of bitches.*

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<sup>2</sup> <https://www.akcchf.org/educational-resources/library/articles/responsible-breeding-and.html>  
<https://bsava.com/position-statement/inherited-diseases-and-exaggerated-characteristics/>  
<https://www.cam.ac.uk/stories/preventing-genetic-diseases-in-dogs>





While the AVA agrees with this statement, an essential added caveat is needed , to balance breeding practices with the health and welfare of the dogs and that a veterinarian certifies that the dog is suitable to breed before embarking on breeding on consecutive cycles.

Further to this, the discussion paper also states:

*Allowing bitches in suitable health to be bred continuously conforms with a natural husbandry situation and enables them to be retired from breeding at an earlier age, noting further considerations would need to be given to prevent overbreeding.*

We caution against the use of this language as it tends to justify practices based on a dog's natural husbandry rather than a physical/medical assessment to determine if breeding can be recommended.

Finally, a note on terminology: We are pleased to see the example of brachycephaly included (noting the term is *brachycephaly* or *brachycephalic*, **not** *brachiocephalic* which is found in the discussion paper).

### **3. Should larger-scale breeding operations be subject to any additional requirements to ensure compliance with regulations?**

As outlined in the response above to question 1, the size of a breeding operation does not determine its ability or otherwise to comply with regulations, provided it is adequately resourced and has suitable capacity to house and care for the animals, including meeting requirements aimed to provide [the Five Domains of Animal Welfare](#).

Good and bad animal welfare practices are possible in all sizes of breeding operations. Just because the business is large, doesn't necessarily mean that welfare isn't managed properly. Small-scale backyard or "mum and dad" breeders can also be guilty of not looking after their animals appropriately.

Limiting the number of animals allowed to be kept by breeders is not necessarily going to improve animal welfare. The ability of an establishment to provide for an animal's welfare is influenced by its capacity to care through the provision of space, resources, time, and trained staff in adequate numbers. The problem is not isolated to the large-scale puppy farms and any new legislation to address the issue should be cognisant of this fact.

Relevant AVA Policies:

- [Puppy farming](#)
- [Animal shelters and municipal pounds](#)

### **4. What other issues/matters concerning breeders and/or breeding are you able to identify?**

Enforceable Dog Breeder Standards are an important tool to support investigations and prosecutions of suspected puppy farming activities or to form the basis of regular compliance inspections linked to breeder identification renewals. These Standards should be adopted into legislation as compulsory codes under the respective state animal welfare legislation.

Dog Breeder Standards should include chapters covering at least the following topics: responsibilities of owners; animal health and veterinary care; housing and environment; hygiene and management;



breeding and rearing; socialisation and environmental enrichment; management of inherited disorders; transfer of ownership; and requirements for identification.

Specific Standards should include: minimum age of breeding, maximum lifetime litter numbers for a breeding bitch, maximum age of breeding, appropriate preventative health regimens including veterinary examinations, management of breeding activities including mating and whelping, rearing, weaning, socialisation and practices that promote behavioural health and wellbeing, housing and space requirements, and requirements for record keeping.

## Theme 2 - Identification, Tracing, and Licensing

### 5. Should Tasmania's microchipping be consistent with other states and territories requiring microchipping by 12 weeks of age?

The AVA supports harmonisation of legislation across all Australian jurisdictions and recommends alignment with the AVA policy on the [electronic identification of animals](#).

### 6. What are your views on requiring a kennel licence holder to state whether they are a breeder?

The AVA would be supportive of kennel licence holders stating whether they are a breeder, as this will assist with breeder regulation, as expanded on in answer to Q 8 below.

### 7. Should Councils be required to consider extra welfare requirements for dogs kept in group situations?

The AVA highly recommends that the AVA policy [Boarding facilities including dog and cat daycare centres](#) be taken into consideration as part of the welfare considerations for dogs kept in group situations.

### 8. Would you support information sharing amongst animal welfare regulators for the purposes of identifying dog breeders?

The AVA supports the implementation of a rigorous companion animal registration system coupled with a comprehensive breeder registration system that will provide a high level of traceability of companion animals throughout the supply chain in the community. These tools will give enforcement agencies what they need to trace and address puppy farming.

It is important that the breeder of origin can be easily identified, and the AVA supports the implementation of breeder registration to ensure breeders can be checked for compliance with any compulsory breeder Standards. The AVA believes it should be a mandatory requirement for the breeder's registration number to be displayed in all advertisements and at any point of sale. This requirement should apply to any context including online internet advertisements, pet stores, markets/fairs, printed advertisements, and any other advertisement.

A centralised registration system for all elements of companion animal registrations has some merit and should be investigated. Having a coordinated and central approach that is open and accessible by





government authorities, animal welfare agencies, veterinarians, and the public, would provide effective identification with trace-back of the animal's owner and point of origin. This would be an invaluable tool for annual monitoring and breeder compliance with Standards and Codes of Practice to facilitate the flow of companion animal information across state and territory borders.

Council inspectors should include in their assessments of all domestic animal establishments that their facilities meet all the companion animal welfare needs, including:

- physical size of housing and cleanliness
- good physical and mental health
- animal and human socialisation
- exercise requirements.

As part of these inspections, records should be maintained to assess if the animals' needs are being met, including in relation to birthing, diet, disease prevention, environmental enrichment, exercise, grooming, hygiene, parasite prevention, socialisation, and vaccinations. This provides quantifiable metrics for determining and assessing that animal welfare needs have been met in a systematic way. It is important that these requirements are meaningful in their application and not a tokenistic tick-box, for example the ticking of the socialisation box doesn't allow for the assessment of the animal's mental health.

The AVA recommends inclusion of a restriction that anyone who has been found guilty of an animal cruelty offence is not eligible to register a companion animal business and similarly supports the powers for councils to suspend and revoke registrations. This is particularly important as a significant number of animal hoarders identify as breeders.

The AVA supports penalties prescribed for non-compliance with the legislation. We believe there should be provisions included for warnings to allow operators to improve and comply. Penalties need to be proportional to the severity of the offence and serve as an effective deterrent.

## Theme 3 - Handling, Management, and Containment

### 9. Are the current Animal Welfare (Dogs) Regulations relating to exercise adequate and appropriate? If not, why not?

While the AVA acknowledges the effort to mandate daily exercise, it is important to account for the diverse needs of dogs based on their age, breed, and health.

The Regulations state that *“a person with care or charge of a dog must ensure that the dog is provided with a reasonable opportunity for exercise for at least 60 minutes in total each day.”*

This is both prescriptive (length of time) and subjective (regarding what constitutes exercise).

The Tasmanian [Animal Welfare Dog Standards & Guidelines for Animal Housing Establishments](#) add further prescriptions *“4.5. Dogs over 6 months of age must be provided with the opportunity to exercise for no less than 10 minutes at least twice daily and for no less than 60 minutes in total each day”*.



A more flexible Guideline based on subject matter expertise is recommended to ensure exercise needs are met according to practicality and welfare outcomes. This could focus more on defining containment and tethering (see Q12 below) aspects of animal welfare rather than specifying minimum exercise requirements.

## 10. Do you consider the current training guidelines deliver an appropriate level of advice?

The discussion paper states: “Dog training techniques are included in the [Animal Welfare Dog Guidelines](#)”, however, no reference to dog training techniques could be located in the document. As such, further guidance and education for the community is required,

The AVA supports evidence-based training methods and recommends updating training guidelines to reflect modern practices, including reward-based training over aversive techniques. Evidence to support this can be found in the [joint position paper](#) published by the Federation of Veterinarians of Europe, which includes the following recommendations:

### *Recommendation 5*

*Training methods used for animals should be evidence-based, behaviourally appropriate for the species and grounded in an understanding of learning theory. Veterinary professionals should apply and advocate the use of humane, effective training methods that support good animal welfare, and ensure these methods are used by trainers they recommend to their clients. We do not support the use of positive punishment training techniques for any animals, or the application of outdated dominance theories.*

### *Recommendation 8*

*We call for regulations and guidance that safeguard animal welfare and promote humane training techniques and welfare-friendly handling, applicable to all types of sport, showing or competing of animals where training has been required.*

There is a growing trend of non-veterinarians providing advice and guidance on dog behaviour, including behaviour management. Many of these 'trainers' operate without any minimum qualifications, knowledge, or experience, posing significant risks to dog welfare. The AVA strongly advocates for a review of dog training services in Australia and calls for their inclusion within animal welfare regulations to ensure the safety and wellbeing of animals.

Relevant AVA Policies:

- [The use of punishment and negative reinforcement in dog training](#)

## 11. Should Tasmania’s legislative framework consider provisions for electric collars?

The use of positive reinforcement training methods is recommended for modifying the behaviour of dogs. Electric collars utilise the principles of punishment and negative reinforcement to reduce or stop unwanted behaviours. The psychological dangers and negative welfare implications of using punishment and negative reinforcement are well documented.

The AVA does not support the use of electric collars. Collars designed to inflict pain, discomfort or fear to achieve behavioural change should not be used on dogs. Examples include electronic collars, citronella and choke collars. Positive reinforcement training of dogs renders the use of such equipment unnecessary.



This position is supported by the [joint position paper](#) published by the Federation of Veterinarians of Europe, which includes their following recommendations:

*Recommendation 6*

*Equipment and techniques used for training purposes should not cause an animal pain, fear, stress or distress, and should not put animals into unnatural body postures.*

*Recommendation 7*

*We call for a complete ban on the sale and use of electric pulse training devices, such as electric shock collars for dogs or goats used to deliver an electric shock.*

Relevant AVA Policies:

- [Use of behaviour-modifying collars on dogs](#)

## 12. Do you think the tethering regulation is ambiguous? If so, how might it be made clearer?

To provide consistent and clear guidance we recommend using the AVA's [Guidelines for the tethering of animals](#). These guidelines include stipulations such as tethered dogs must have a minimum 3-meter tether radius (6 meters of run) and access to appropriate shelter that is safe and of suitable size. Dogs under 4 months old, bitches in season near entire males, and those about to give birth must not be tethered. Welfare requirements such as checking food and water regularly and ensuring consistent shelter available regardless of weather must also be met. Tethering must avoid risks such as entanglement or hanging near fences, and dogs should be released from tethers for at least 2 hours daily for exercise and well-being.

## Theme 4 – Facilities, Housing, and Sleeping

### 13. Do you consider the current minimum housing and sleeping area requirements outlined in the Animal Welfare (Dogs) Regulations are adequate? If not, please advise where you think they could be improved.

The AVA recommends consideration be given to the guidelines provided in the AVA's policy [Animal shelters and municipal pounds](#). This includes that a veterinarian should be engaged to advise on design requirements for animal shelters and pounds. Facility requirements should include that pens should be constructed to house up to two adult dogs as a maximum, even at peak usage. Also, that housing design should ensure that dogs' health, welfare, physiological, behavioural and social needs are met.

These guidelines should be viewed as a minimum, with consideration of the [Five Domains of Animal Welfare](#) included in requirements around housing and sleeping, as outlined in more detail to the answer to Q14 below.

Other resources available include;

- [Victorian Domestic Animals Amendment \(Puppy Farm and Pet Shops\) Act 2017](#)
- [Guidelines for Standards of Care in Animal Shelters](#)
- [WSAVA-Animal-Welfare-Guidelines-2018](#)



#### 14. Do you consider the environmental enrichment section of the Animal Welfare Dog Guidelines to be adequate? If not, why not?

The AVA supports enhancing the enrichment guidelines to address breed-specific and individual dog needs and emphasise regular interaction, mental stimulation, and diverse enrichment opportunities for psychological well-being.

Consideration should be given to the need for requirements to extend beyond “minimums” and embrace the sentience of dogs by providing positive experiences, not just the meeting of basic needs such as food and shelter.

The *Five Domains of Animal Welfare model* offers a structured approach to assess and enhance animal welfare, recognising both physical states and emotional experiences. It encompasses 4 physical domains – nutrition, environment, health, and behaviour – and one mental domain that captures the animal's overall emotional state. By addressing these domains comprehensively, the model moves beyond mere survival to focus on positive experiences that contribute to wellbeing. This is particularly relevant for facilities like pounds and shelters, where meeting only minimum Standards may overlook the emotional states of animals, such as fear, frustration, or loneliness.

Recognising the sentience of dogs demands a commitment to practices that foster enrichment, social interaction, and comfort to ensure their holistic welfare is supported, not just their basic care needs.

### Theme 5 - Transport

#### 15. Should there be similar requirements for road, air, and sea modes of dog transport? If not, why not?

The AVA advocates for consistent Standards across all modes of transport to ensure the safety and welfare of dogs, particularly during extended journeys such as across Bass Strait.

The existing Tasmanian [Animal Welfare Guideline Breeding Dogs.pdf](#) contains detailed guidance around transport and includes reference to the [IATA Live Animal Regulations](#). These guidelines, along with the AVA's policy on [the medication of dogs and cats for air transport](#), could be included in the consultation and further development of regulations.

With respect to air transport, dogs and cats should not be sedated for air transport. An animal's natural ability to balance and maintain equilibrium is altered under sedation, so when a kennel is moved the animal may not be able to brace and prevent injury. Sedation does not affect the anxiety of animals. Sedation can reduce an animal's ability to regulate its body temperature and it may be less likely to drink, becoming more prone to dehydration. Additionally, there may be complications with aspiration of water into the lungs when an animal is sedated.



## Theme 6 - Exemptions

### 16. Should the current exemptions for members of Dogs Tasmania, greyhounds, and working dogs continue?

Exemptions should only continue if the welfare Standards of these groups exceed or are equivalent to the proposed regulations. This must include review and independent auditing to ensure compliance with high welfare standards and must not rely on self-regulation.

Given the recent concerns around Greyhound Racing in Tasmania and other jurisdictions, this aspect should be given very close consideration and may benefit from the outcomes of recent Parliamentary Inquiries.

## Theme 7 - Other

### 17. Are there any other matters which you would like to raise in relation to improving dog welfare outcomes in Tasmania?

In addition to the issues raised in this submission, the AVA also recommends that the 'Animal welfare Standards and Guidelines for dogs'<sup>3</sup> be formally reviewed. A number of aspects in the document have been identified by our members as needing clarification or updating. Below is a non-exhaustive list of areas that need addressing:

Item	Feedback
G1.3 Supervision	Deals with staffing ratios during business hours but is silent on any afterhours supervision.
3. Housing	As outlined in response to Q 14 above, requirements should extend beyond "minimum" standards to a higher level consistent with the <a href="#">Five Domains of Animal Welfare</a> .
3.3 Crates	10 hours per day of crate confinement is considered too long.
3.11. Tethering	Requires updating. Refer to AVA Guidelines for the tethering of dogs <a href="#">Guidelines for the tethering of animals</a> .
4.5. Exercise	The wording in this section is ambiguous.
G4.4 Grooming	Dental care is not part of routine grooming - dental assessment is required to be undertaken on a regular basis by a veterinarian.  It should also be included that if concerns are raised around the areas noted (eyes, nose, ears, breech, nails) then veterinary advice must be sought.
G4.5 Temperament and breeding	This should be replaced with:

<sup>3</sup> [https://nre.tas.gov.au/Documents/Animal%20Welfare%20Guideline\\_Breeding%20Dogs.pdf](https://nre.tas.gov.au/Documents/Animal%20Welfare%20Guideline_Breeding%20Dogs.pdf)



	<i>A temperament assessment by a qualified veterinary professional should be undertaken prior to intentional breeding.</i>
4. Notes on socialisation	<p>The notes should be revised to communicate that the socialisation period of puppies is recognised as extending up to 14-16 weeks.</p> <p>Socialisation promotes normal neurotypical psychological development and helps in the prevention of mental health issues, such as anxiety-based problems.</p> <p>Also, the reference to aggression should not be included here as it is often a normal repertoire of behaviour, so can be classified as normal.</p>
G6.2 Pest control operations	The word “Specialist” should be replaced with “veterinary”.
S 8.3. Whelping	<p>The AVA recommends that breeders and those involved with whelping undergo training in normal whelping and are provided guidance from veterinarians around abnormal whelping. This should also include a requirement to seek veterinary advice where concerns are raised around a whelping, and also where veterinary attention can be obtained (at all hours).</p> <p>The guidance around whelping provided at 8.3 should be revised and can include:</p> <p>If, prior to the onset of labour, the mother (dam) shows strong nesting behaviour, restlessness, panting, or mild contractions for more than 12–24 hours without progressing to active labour</p> <p>Where whelping has commenced with the onset of contractions the following guide is recommended as to when to seek advice from a veterinarian:</p> <ul style="list-style-type: none"> <li>• If the dam has strong, visible abdominal contractions for more than 30 minutes without delivering a puppy</li> <li>• Weak and infrequent contractions fail to deliver a puppy within 3 hours.</li> <li>• If more than 2 hours pass between puppies with no signs of contractions or progress.</li> <li>• Signs of severe pain, crying, collapse, extreme fatigue or systemic illness</li> <li>• If green, dark, or bloody vaginal discharge occurs before any puppies are born.</li> </ul>
G8.5 Risk of heartworm transmission	This should be broader to encompass other infectious/transmissible conditions e.g. paralysis tick (tick control), Leptospirosis (additional vaccination).
G9.1 Euthanasia of dogs	This should be a Standard not a Guideline and align with <a href="#">Animal Welfare (Dogs) Regulations 2016</a>





	<p>22. Euthanasia of dogs</p> <p>(1) A person with care or charge of a dog must not cause or allow the dog to be destroyed unless the destruction is carried out humanely by a <u>veterinary surgeon or a person who is acting under the direct supervision of a veterinary surgeon.</u></p>
G10.3 Post litter health check	<p>The AVA requests that G10.3 be revised to include the following information:</p> <p><i>Prompt evaluation within 24–72 hours after whelping to ensure the health of the mother (dam) and her puppies is recommended.</i></p> <p><i>Regular health checks are recommended during the first 6–8 weeks with particular attention to puppy growth milestones, vaccination schedules, and deworming protocols.</i></p>
G10.6 Urination and defaecation	<p>The AVA would like to see this guideline revised to reflect:</p> <p><i>Puppies only urinate/defaecate with maternal stimulation initially.</i></p> <p><i>Toileting behaviour /housetraining should be started at 8.5 weeks when a puppy’s physiologic development is sufficient to allow this to be effective. Noting that at 8.5 weeks, puppies may no longer be at a breeding facility.</i></p>
G10.8 Socialisation to humans and other animals	<p>Other exposures and experiences may also be advisable. Advice from a veterinarian should be sought regarding socialisation of puppies.</p>
G10.9 Useful breeding life	<p>The term “useful breeding life” would require additional clarification and reference to any guidelines related to retirement from breeding.</p>
S11.7 Rehoming and behaviour	<p>Clarification is sought as to whether the transfer of ownership is referring to breeding stock or puppies?</p> <p>For either, this should include a requirement to advise that the assessment of the dog or puppy’s behaviour, and how it can be managed, should be undertaken with veterinary advice.</p>
S11.10. Microchipped prior to release.	<p>It is highly important to include in the Standards, or at least in the Guidelines, the following wording: “<i>Information must be provided to the new owner around how to update the details on the Pet Registry used for the dog’s microchip to reflect the new owner’s details</i>”.</p>
G11.1 Information for new owners	<p>If the dog is a brachycephalic or chondrodystrophic breed, information relating to the additional health issues of these breeds, and the potential additional/significant costs for veterinary care must be provided.</p>



## Conclusion

The AVA appreciates the opportunity to contribute to the improvement of dog welfare outcomes in Tasmania.

The AVA's submission emphasises the importance of evidence-based, humane, and enforceable Standards. The AVA remains committed to collaborating with the Tasmanian Government to enhance the welfare of dogs across the state. By integrating the principles of sentience and the Five Domains of Animal Welfare into the revised regulations, Tasmania has the opportunity to set a leading example in animal welfare legislation.

## Contact

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