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Re : Response to AFCD public consultation of the Public Health(Animals and Birds)(Animal Traders) Regulations(Cap. 139B)

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有關加強規管寵物買賣, 以促進動物健康和福利的諮詢文件, 此文件以” 以促進動物健康和福利”為大前提,我們希望署方真正以動物福利為本, 去理解我們的訴求。

In response to the AFCD public consultation of the Public Health (Animals and Birds) (Animal Traders) Regulations (Cap. 139B), we are writing to express our concerns towards the pet trading industry, in particular the pet breeding and trading sector. The consultation document, according to AFCD, is written in the interest of animal health and welfare. We therefore, hope that the department would consider our suggestions in this perspective sincerely.

以下是本會的意見:

We, Animal Friends, suggest

1. 繁殖和售賣地點：由於香港居住地方狹窄, 在住家繁殖大量動物會影響其他居民; 這類型的商業活動,包括所有繁殖和售賣都需要在非住宅進行,就正如規管獸醫和狗酒店一樣,並要附合消防和地政條例, 以確保動物和工作人員安全和土地用途。

Due to the dense population and close proximity of households in Hong Kong, breeding and keeping a large quantity of animals in a residential unit may cause hygiene and noise related problems to the neighbors. Under the new regulations, the breeding and trading activities will only be preceded at the non-residential areas, similar to the regulations that is currently applies to veterinary clinics and dog kennels. To ensure the safety to the animals and

working staff, fire department should also regulate the layout and materials used in the units. And also, the usage of the unit should be regulated by the Land department.

2. 除了繁殖牌照外, 持牌人亦需要每一隻用作繁殖的動物植入晶片受及繳交每年牌照費, 例如每隻牌照費用為例\$1000, 5 隻動物便是\$1000x 5= \$5000.

Any person who wishes to breed their animals will be required to register a compulsory breeder's permit. Every animal that is to be bred will be required to be registered and licensed. For example, \$1000 for each licensed animal. Should the breeding licence owner owns 5 animals for breeding purpose, he/she has to pay \$1000 x 5 animals = \$5000.

3. 每隻動物只可以生產 5 胎, 之後便要停止生產及絕育。繁殖者有責任照顧該動物, 直至終老。

Every breeding bitch is only allow up to a maximum of 5 litters in her life span. The owner is responsible for the neutering of the animal after the 5 litter, and responsible to take good care of the animal until it dies.

4. 所有動物需由香港註冊獸醫作每年身體檢查, 注射防疫針, 以防止傳染性病毒, 確保出售動物健康。

Every breeding animal will required to be examined and vaccinated by Hong Kong registered veterinarian to ensure the breeding animals are up to date with vaccination and are in good health condition to be allowed for breeding. This ensures that minimal transmissible diseases will occur in their progenies.

5. 每年有大量被遺棄及流浪動物因沒有人領養而被人道毀滅, 但繁殖者和寵物店卻同時以生計利益而不斷繁殖和販賣小動物圖利, 所以為減少被遺棄動物的數字, 每年動物的出售數字應該設有上限, 上限為人道毀滅數字的 1/3。

In the past years, large amount of pet animals were being abandoned and euthanized due to the lack of adopting families. However, at the same time, breeders and pet shops are making profit by breeding and selling animals. To reduce the number of abandoned animals, the number of animals being breed and sold should be limited. The limitation number is 1/3 of the animal euthanized in the past year.

6. 現時漁護署透過動物團體推行的動物領養服務十分成功, 有很多小動物因此得到機會繼續生存, 在領養過程中, 動物團體會核實領養者的身份和背景, 例如居住地方是否容許飼養寵物, 領養者是否有能力照顧該動物等。我們建議所有動物買賣亦需以飼養人的條件為基礎, 以配合漁護署一向宣傳“做個有責任主人”的訊息, 每位購買動物的人需向漁護署登記。

AFCD has been successfully implementing adoption services via several animal welfare organizations. The outcome is encouraging and many animals are being rescued and live happily in their new homes. To ensure the animals go to a suitable home, the animal welfare organizations obtain the adoptors' identity and screen them based on their background and other perspectives concerning the adopted animal's welfare. AFCD has been promoting the message of "responsible ownership" to the public. We suggest the same requirements should be implied to the pet trade too. People who want to purchase and keep an animal should fulfill certain requirements.

7. 每一個持牌者所擁有的動物數字設有上限,例如最多 5 隻,而同一個登記單位,只可以登記不多於一個牌照,以確保動物得到適當照顧。

Every breeding permit holder owns no more than 5 animals. Each premise should have no more than one licence registered.

8. 出售動物最少要有 5 個月以上,並已植入晶片,注射預防疫針。如發現持牌人出售 5 個月以下動物,將被罰款和取消其牌照。

All sold animals must be reach the age of 5 months, microchipped and vaccinated. Any breeders, if proven, who are found to be selling animals under the required ages, should be punished with fine and suspension of breeding permits.

9. 管制繁殖售賣,個別不適合香港環境飼養的品種需要特別牌照。繁殖有攻擊性的狗種,例如 Tibetan Mastiff, Dogo Argentino, Fila Brasileiro, Japanese Tosa, Pit Bull Terrier or American Pit Bull, Perro de Presa Canario or Presa Canario 等,更應全面禁止,否則持牌人將被罰款和/或升監禁。

Certain breeds that are deemed not suitable for the Hong Kong environment should be restricted or require special permits to be kept in Hong Kong. Highly aggressive breeds such as Tibetan Mastiff, Dogo Argentino, Fila Brasileiro, Japanese Tosa, Pit Bull Terrier or American Pit Bull, Perro de Presa Canario or Presa Canario should be banned from Hong Kong. Breeding of the above mentioned animals will be illegal and should be punishable by fine and/or imprisonment.

10. 所有動物不可長期困籠,狗隻每日需有至少 2 小時自由活動時間,持牌者必須讓狗隻出外溜狗。

All animals are not caged in a long term. They can move freely at least 2 hours a day. Permit holders must walk the dogs outside the premises to give them adequate exercise.

11. 每一個持牌者都需要申請商業登記,就如其他商業活動一樣,必須報稅。

All licence holders are required to obtain business registration certificate, like other business entities. Annual tax return must be submitted to the Government.

12. 絕對不容許電擊帶、剪聲帶、燒吊鐘或其他方法等對待狗隻, 令其不能吠叫。

Debarking, shock collars, or other means of technique that inflicts pain and injuries to stop an animal to bark will be prohibited and deemed illegal.

希望署方將”以促進動物健康和福利”為大前提考慮我們的建議。

We sincerely hope that AFCD will consider our suggestion, in the interest of animal health and welfare.