

To Whom It May Concern,

I am very supportive of more ethical breeding and placement of dogs that are healthy, enriched and happy. However, object to the current application by the ANKC for Authorisation.

I table the following comments in relation to the ANKC request for authorisation.

1. Page 3 – The application misrepresents the Limited and Associate Registers which are two separate and distinct registers. The paragraph in the submission incorrectly suggests these are one and same. Dogs registered on the limited register are restricted by the ANKC and member bodies from having progeny registered with the ANKC or the member body and participating at conformation shows. This is done at the request of the breeder at the time of registering the litter with the member bodies. It is possible for dogs to be transferred from the limited to the main register and it has been anecdotally alleged from owners that breeders use this register to restrict others from using their bloodlines, and compete against them at conformation events. There is a clearly false statement made that *“this type of registration is open to dogs that are sterilised (which must be evidenced by a sterilisation certificate)”*. Sterilisation is not a mandatory requirement for the Limited Register. In fact, one of the main complaints of the ANKC and member bodies is that owners of dogs sold by ANKC / member body registered breeders is that dogs sold on limited register are still being used to breed on other registries.
2. Page 3 – The application states:

“Registration with the ANKC Member Bodies (or recognised registration body) provides certainty of family lineage as supported by pedigree records.....”

This statement suggests that lineage is a certainty which is incorrect. Lineage and parentage can only be confirmed by DNA testing which is not mandatory for all registrations. This would be the only way that lineage could only be a certainty. In fact, lineage for the most part until the very recent moves to require some selective DNA testing on the Main Register, is only as certain as the honesty of the person registering dogs. There have been many instances of false pedigrees following complaints that have prompted investigations and DNA testing to show that incorrect dogs and even dogs of different breeds have been used in breeding programs of dogs registered with the ANKC and member bodies. The only way there would be certainty would be to mandate compulsory DNA testing for all registrations – this does not appear to be the current practice of the ANKC or member bodies. Claiming certainty is impossible under current arrangements.

The only requirement of the ANKC in the regulations is (however, some member bodies require DNA parentage on some main register applications):

2.1 Where the parentage of a dog or litter is disputed or uncertain the Member Body may direct that DNA testing be carried out and determine the arrangements relating to such testing. The Member Body shall appoint a person to coordinate the testing.

3. Page 6 – The application states that *“ANKC is prepared to recognise other organisations within Australia to provide Registration services if the practices of those organisations materially meets the Code of Ethics and other regulations, codes and rules of the ANKC”*.

This statement is vague and subjective. It is incumbent on the ANKC to provide clear, objective criteria that outlines the process to be followed to apply for recognition of an organisation by the ANKC and to articulate the Code of Ethics, regulations, codes and rules of the ANKC that must be met for recognition. Otherwise the recognition process is open to inconsistency and subjectivity and it could be suggest avails the ANKC of some optionality to refuse recognition without providing reason or opportunity to meet criteria to be recognised. It is essential that such a process be developed and in place prior to approval of any applications.

From the ANKCs own statement they advised that they have operated since 1949 and are composed of one organisation for each state and territory in Australia with most of those existing for longer than the ANKC. It appears that in 70 years there has been a restricted membership of the ANKC or recognition of other entities.

The ANKC Board is comprised of representatives from the member state and territory organisations and it is doubtful that any competition in the form of a competitor who doesn't have a process to follow or clear criteria to meet, it at extreme risk of a lack of procedural fairness and objectivity.

It appears that no planning or preparation has been undertaken to demonstrate a genuine commitment to considering recognition for other organisations and any application before this is established and clearly outlined is premature.