



Our ref: AA1000442
Your ref: AWR.408785
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30/08/2019

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Andrew Rankin
Partner
Piper Alderman

By email: arankin@piperalderman.com.au

Dear Mr Rankin

**Authorisation AA1000442 submitted by Australian National Kennel Council Limited—
Request for information**

I refer to the Australian National Kennel Council Limited's (**ANKC**) application for authorisation lodged with the ACCC on 28 May 2019, the ACCC's request for information dated 25 July 2019 and ANKC's response dated 15 August 2019.

In order to assess the application, we seek clarification from ANKC on a number of issues. Our questions are set out at **Attachment A** to this letter. Please provide a response to our questions by **9 September 2019**.

We intend to publish this letter, together with ANKC's response, on the ACCC's public register. If ANKC wishes to request exclusion from the register any information provided in response to this request, please clearly indicate this and provide brief reasons for the exclusion request when providing the information.

If you wish to discuss any aspect of this matter, please do not hesitate to contact Connie Wu on (08) 9325 0637.

Yours sincerely

Darrell Channing
Director
Adjudication

Attachment A – ACCC Information Request

1. In relation to the proposed amendment to ANKC's Code of Ethics, please answer the following questions.
 - a) Please advise whether the proposed amendment is intended to apply to all members of ANKC Member Bodies, including "handler", "associate" or "companion" members? If so, please provide reasons.
 - b) How would the proposed amendment affect members of ANKC Member Bodies who breed or own "working dogs" that are not able to be registered on the ANKC Main or Limited registers?

2. The second paragraph under 7.1, at page 9 of ANKC's submission in support of its application for authorisation (**submission**), states:

"ANKC is aware of only a very small number of breeders registered as members of ANKC Member Bodies that currently obtain Registration services from registration organisations not recognised by the ANKC... It is proposed that those breeders are more likely to seek Registration services from ANKC Member Bodies when the Proposed Amendment is given effect" (emphasis added).

Please provide an approximate total number of breeders registered with all ANKC Member Bodies that are also currently obtaining registration services from other organisations not recognised by the ANKC.

3. The fourth paragraph under 7.1, at page 9 of ANKC's submission, states:

*"The Proposed Amendment only impacts breeders who are registered as members of ANKC Member bodies. **It is not expected that the Proposed Amendment would have any impact on owners of dogs (that have not been Registered) seeking Registration services from ANKC recognised bodies or other unrecognised registration organisations**"* (emphasis added).

Please clarify the meaning of the bolded part of the sentence, in particular the words "owners" and "ANKC recognised bodies".

4. ANKC submits that in 2016 only 15% of all puppies in Australia were bred by breeders registered as members of ANKC Member Bodies. It appears this calculation takes into account the number of puppies bred by breeders who are not members of any private organisations that offer canine (or breeder) registration services. Please provide an estimated market share of the ANKC and/or the ANKC Member Bodies in the "Australian market for registration services", as referred to ANKC's submission. Please also provide an estimated share of the market for each of the other "unrecognised registration organisations" named at 6.3 of ANKC's submission.