

International Canine Breeders Studbook P/L

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ACCC – Australian Competition Consumer Commission

Re: Australian National Kennel Council
Limited Application for authorisation
AA1000442



28th October 2018

Dear Miriam,

Please see attached submission from International Canine Breeders Studbook P/L

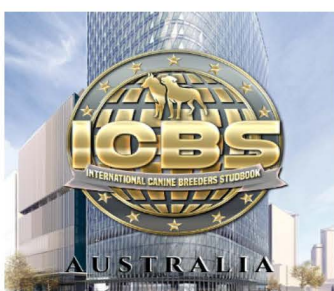
I have spoken in great lengths with Connie Wu, regarding ANKC submission over the past few months.

Please see full detailed and outlined submission, against the ANKC application for authorisation.

Warm Regards



Deneale Bennett
ICBS P/L
Director



Submission to the Australian Competition and Consumer Commission

Australian National Kennel Council Limited application for authorisation AA1000442

Submission: International Canine Breeders Studbook P/L (**ICBS**) by Director Deneale Bennett

- International Canine Breeders Studbook is an Australian and International Purebred Register and Canine Sports. Whilst ICBS is a global company, ICBS also operates in New Zealand, United Kingdom and United States of America.
 - International Canine Breeders Studbook (ICBS) has approximately 2.8 million members globally. Consisting of Breeder Members, Pet Owner Members, Associate Members, Canine Sports Members, Affiliation and club members. Working Dogs, Force Dog and Puppy School Members. Each member must be accounted for and falls under our 20 Million Public Liability insurance as a member.
 - 1.6 Million Members are in Australia.
 - TAS – 503 Members
 - VIC – 271,851.45 Members
 - NSW – 448,753.09 Member
 - NT – 2,022 Members
 - WA – 527,701.96 Members
 - QLD – 161,404.78 Members
 - ACT – 4,505 Members
 - SA – 183,258.72 Members
- | | |
|--|-----------------------------|
| | * Main Purebred Registry |
| | * Limited Purebred Registry |
| | * Canine Index Studbook |
| | * Foundation Register |
| | * Canine Sports Registry |

CODE OF ETHICS

- ICBS has the strongest and highest Code of Ethics and practices globally. ICBS was the first registry globally, to have mandatory Proof of Parentage (all canines) and DNA testing for those on mains. This was a requirement ICBS step out the very first day, the registry opened. Making ICBS the only legal registry globally, that can scientifically prove every canine registered in our database, to be true and correct and not just on hearsay of the owners.

Veterinary signoff is required on every canine or litter being registered with ICBS.

To prove, Colour of the canine to be true and correct, the canine microchip details and if the canines were AI (Artificial insemination) Legal stamp of the practice Veterinarian and name is required and dated on all paperwork.

If a canine was to get out of an owner's property and end up in a pound, ICBS paperwork is the only legal paperwork that can prove the canine's entirety. Photo, DNA, Case numbers, Heritage, Microchips, and DOB.

ANKC database, MDBA database, and other registries only take hearsay of what the breeder is registering. Which makes the integrity of their databases compromising for fraud and deceit to continue to take place.

- Dogs Queensland State Body has only just brought this is as on 1st January 2019 this year. Forcing members to DNA after, publicly being caught out that ANKC is the only registry that matters and has high codes. It was from myself standing up to some of the board of Directors Publicly about our code of ethics, that this started to change for state branches (ANKC banner).

REARING AND BREEDING

- Each state in Australia has its government legislation and law requirements they must follow. Each breeder agrees to abide and adhere to each government requirement.
- A breeder must have no more than 2 litters, in a space of 18 months.
Canine must be rested for one heat cycle.
Canine must be over 12 months of age on can only be mated on their second heat cycle. This is an ICBS requirement and states government legislation.

HEALTH & ADVISORY

- ICBS is committed to ongoing improvement, ensuring that the members remain up to date with today's health and genetic testing.

Disease traits and educational tools to help educate the public.

ICBS is partnered with Orivet Pet Care Laboratories.

ICBS continues to work with the professionals that specialise in the fields with George Sofronidis BSc (Hons) Orivet Pet Care Genetics and Dr. Michael Bell Craigieburn Animal Hospital. (Hospital, Reproductive, Lameness, Racing)

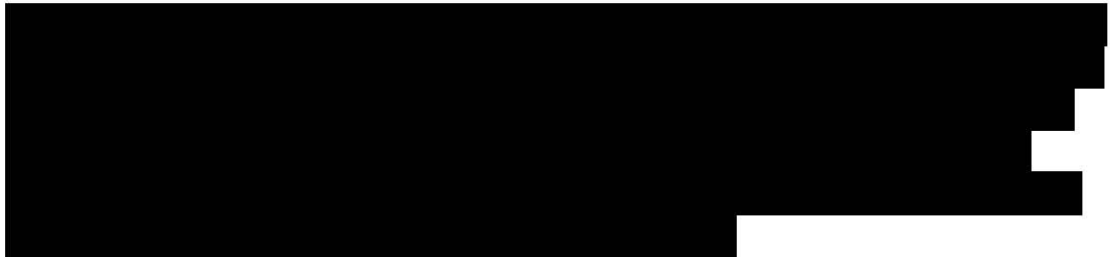
DIRECT COMPETITION TO ANKC

- ICBS is the only registry in direct competition with ANKC. Due to the fact we have our Canine Sports, Obedience, Agility, Fun days and Shows.
All other registries in Australia are only Canine Registries.
- ANKC is changing these codes to stop anyone attending anything ICBS.
These power play practices have been going on for many years, with ANKC trying to [REDACTED] stop them from being at my events.

Dogs Victoria, Dogs Queensland changed their constitutions to restrict their members from attending anything other than their state bodies' events.

Changing the code of ethics and rules.

- No canines to be registered with any other body other than ANKC approved.
 - No member can participate in any other event other than ANKC Approved.
- If a member is found exhibiting as a handler or participating with their canines, suspensions are placed straight on those members and then must front their state's board. This also includes judges being suspended.



Every moment ICBS does, ANKC then make another amendment and change to their states body. Dogs NSW minutes have ICBS in them as part of their meetings several times. Calling ICBS and I quote "A rogue Registry" but also in the next issuing statement. They have stated, that they need to come up with ways to be on top of ICBS and implement procedures to be on par or ahead of due to Dogs NSW being behind in some of the structures of their business.

https://www.dogsnsw.org.au/media/2717/12-minutes-13_dec_2017-for_publication-1.pdf

ANKC – Australian Only VS ICBS International Canine Breeders Studbook.

- ANKC is an Australian company only.
ANKC is broken down by individual State body Associations under the ANKC Banner. Each of these associations has its controlling power, a board of representatives. ANKC does not have the power to implement the individual states do. This has caused major conflict between members of each state, due to the fact some states require certain requirements for registration, only some colours are accepted. Some of the states have restricted members and other states not.
- ICBS is an Australian Company and International company.
Therefore, standing higher than ANKC. ICBS is controlled by one company around Australia. This means, every member follows the same rules and guidelines not only in Australia but also follows through to other ICBS countries.
- ANKC is only linked International through their part affiliation with the FCI.

Federation Cynologique Internationale. Which only allows 1 registry per country to affiliate to the Company. Linking Australia to other FCI countries but mostly controlled by the KC (Kennel Club) United Kingdom.

- ICBS is International in every country, therefore does not need to be connected to FCI to be linked to each other. ICBS is recognised by other Registries Internationally.


PEDIGREES

ICBS does not upgrade any pedigree papers without the written consent of the breeder and cross-referencing to confirm, they have permitted to do so.

If a breeder withholds paperwork and shows that papers have been sent to them but breeder does not provide purebred papers or a copy of the purebred papers.

ICBS will ask the owner to DNA test their canines to confirm they are purebred canines. Check the database to confirm the DNA matches for parentage and then upgrade the papers. Only providing supporting evidence confirms, that the canine has or is being registered on Mains with both parties showing through written communication confirming.

DUAL REGISTERING

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Members globally regardless of which registry you are with are dual members of many organisations.
- 30% of ICBS members are dual registered with ANKC.
This being that some states like Queensland (Logan Council) and Partial councils in Victory will only accept ANKC registered breeders within their council.
- ANKC only accepts certain breed colours in their standards, will not allow for those canines to be registered. Therefore, this leaves the members no option but to register with other organisations that do allow colours.
- ICBS Accepts standard colours and CNR (Colours Not Recognised) to be registered.
The colour of the canine does not change the canine or make the canine not a purebred canine.
Only due to genetic defeats the only colours ICBS does not allow to be registered is Extreme pied to Extreme pied. White to white, Merle to Merle.
- Restricting these canines and the members, as well as contradicts the state bodies' constitutions. These canines cannot be registered ANKC and if they go to another registry to register those canines, they then get suspended.

ICBS recommendations and conclusions to ACCC.

ANKC do not own the canines, the owner of the canine does.

ANKC does not own anything other than the piece of paper the physical pedigree paper is printed on.

The heritage of the canine physically belongs to the canine itself and no organisations.

No different from the human family tree.

You are asking the general public to give up the rights of what they do with their canines, that the owners purchased with their funds.

ANKC do not hold the power or control to be able to dictate to members, what they do with the canine they purchase from a breeder.

Organisations exist to help, guide and protect the breeds today.

You are asking ICBS to agree to ANKC to allow them to have control over the Industry and other companies.

It is illegal to restrict TRADE, BUSINESS, MEMBERS in not only Australia but overseas also.

The only legal matter that can be stopped is a patent product.

In other Agriculture Industries, you can be a member of as many clubs as you like.

For example, you can own one colour horse. This horse can be registered with one Colour Registry.

That same horse is also, eligible to be registered Part Breed of one register and Register in another.

You can join up with one club for dressage and showing and then go join another club for other disciplines.

The point is, ANKC [REDACTED] use tactics to stop members from leaving and going to other organisations.

Every person has a choice and to do what is right for them and their breeding program.

If every other Industry has competition, why should the Canine Industry be any different?

You penalise one Industry, you then penalise all Industries.

There are no restrictions in any other country, on whom they can be registered with and in fact.

You can compete in any other registry and dual memberships.

This is about the canine here. If you have a chance to dual champion your canine, that you work hard for. Why should this be allowed?

I strongly recommend that this motion does not be put through.

Legally all registries in Australia can then join for a class action to have the matter overturned if this is to be passed. Due to the fact you will then be restricting trade and business as well as the owners.