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SUBMISSION

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Dog and Cat Management
Department for Environment and Water
81-95 Waymouth Street
ADELAIDE SA 5001
Via email: DEW.DogAndCatReform@sa.gov.au

To Whom It May Concern

Re: Breeder Reforms: Standards and Guidelines, Limits and Regulations for dog and cat breeders

Livestock SA is the peak industry organisation for South Australia's red meat and wool producers. Representing over 5,200 sheep producers, 2,700 beef cattle producers and several hundred goat producers across the state, we work to secure a strong and sustainable livestock industry. South Australia's \$4.3 billion livestock industry is a key economic contributor to the state and supports 21,000 South Australian jobs across the red meat and wool supply chains.

Working livestock dogs are a critical component of many South Australian livestock enterprises. They enable efficient livestock handling across large and often challenging landscapes, reduce labour requirements and support improved animal welfare outcomes during mustering, yard work and transport preparation.

Introduction

Livestock SA welcomes the opportunity to provide feedback on the proposed Breeder Reforms relating to the Standards and Guidelines, Limits and Regulations for dog and cat breeders.

Livestock SA supports strong animal welfare standards and the South Australian Government's objective of preventing large-scale commercial breeding operations commonly referred to as 'puppy factories'.

Working livestock dogs are fundamentally different from companion animals bred for the pet market. They are production animals used within agricultural systems and are typically bred selectively within farming operations to maintain proven genetics, temperament and working ability. Regulatory frameworks should therefore recognise the different breeding objectives and management systems associated with working livestock dogs.

Effective feral cat management is also an important consideration for livestock producers, particularly due to the role cats can play in the transmission of diseases that affect livestock health and productivity.

For these reasons, it is important that the proposed reforms appropriately recognise the operational role of working livestock dogs and the biosecurity implications associated with unmanaged cat populations in agricultural landscapes.

The proposed breeder reforms represent a significant change to the regulatory framework governing dog and cat breeding in South Australia. Livestock SA supports measures that improve animal welfare and address irresponsible commercial breeding practices. However, it is important that the implementation of these reforms appropriately recognises the distinct role of working livestock dogs within agricultural production systems and avoids unintended consequences for primary producers who responsibly breed and manage these animals as part of normal livestock operations.

1. Standards and Guidelines for Breeding Dogs and Cats

Breeding Age, Maximum Litter Number and Frequency

Livestock SA does not support the proposed maximum age of six years for a bitch to have her final litter. For working livestock dogs, a maximum breeding age of six years may not be appropriate.

Working livestock dogs typically undergo several years of training and operational work before their suitability for breeding can be properly assessed. Research and industry practice indicate that working dogs commonly reach full operational maturity between two and four years of age, with breeding decisions often made later once temperament, trainability and stock-handling capability have been demonstrated in real working conditions.

As a result, the genetic value of a working dog may only become apparent after several years of practical work on livestock enterprises.

A fixed maximum breeding age of six years can therefore be unnecessarily restrictive and could prevent the breeding of high-quality working livestock dogs that have already demonstrated their capability in livestock operations.

Livestock SA encourages the Department for Environment and Water (DEW) to consider greater flexibility within the proposed Standards and Guidelines to ensure that responsible breeding practices for genuine working livestock dogs used in agriculture are not unintentionally constrained.

Recommendation 1:

Allow greater flexibility for the breeding age of genuine working livestock dogs, recognising that breeding decisions are often made later in a dog's working life once working ability and temperament have been assessed.

Veterinary Exemption Removal

Livestock SA does not support the proposed removal of powers held by veterinarians to determine whether a bitch is fit to breed beyond limits set for maximum breeding age, number of litters and frequency of litters. Retaining veterinary discretion is particularly important if a breeding age cap of six years is imposed.

Veterinary assessment provides a risk-based safeguard that allows breeding decisions to be made based on the individual animal's health, condition and reproductive capability.

Veterinary oversight provides an appropriate safeguard to ensure animal welfare is maintained while also allowing flexibility for responsible breeders, including those breeding working livestock dogs for agricultural purposes.

Removing or limiting veterinary discretion replaces professional judgement with fixed regulatory limits that may not reflect the welfare status or reproductive capability of individual animals.

Recommendation 2:

Retain veterinarian discretion to determine whether an individual animal is fit to breed beyond the prescribed maximum breeding age, maximum litter number and frequency of litter where animal health and welfare considerations support this decision.

Ban on Surgical Artificial Insemination

Livestock SA notes the proposed ban on surgical artificial insemination and encourages consideration of the potential impacts this may have on responsible breeding practices in South Australia.

Artificial insemination is commonly used in breeding programs to enable access to high-quality genetics, maintain strong bloodlines and improve the performance, temperament and working ability of future working livestock dogs.

Access to genetics from interstate, and in some cases international working livestock dog lines is important for livestock enterprises.

Artificial insemination allows breeders to access these genetics where natural mating is not practical due to geographic distance, animal welfare considerations or the limited availability of desired dogs.

The practice supports genetic diversity, reduces the need for long-distance animal transport and allows breeders to access proven bloodlines while maintaining high animal welfare standards.

Livestock SA acknowledges that transcervical insemination offers a safer and humane alternative to surgical procedures. However, anecdotal evidence suggests that only a small number of veterinary practices in South Australia are equipped or trained to perform transcervical insemination.

The proportion of such practices located in regional and remote areas is likely considerably lower.

As a result, restricting surgical artificial insemination without expanding access to transcervical procedures may create a shortage of practical artificial insemination options for responsible breeders.

Recommendation 3:

The South Australian Government supports the training and upskilling of veterinarians across the state, particularly in regional areas, in canine transcervical insemination techniques to ensure responsible breeders retain practical access to artificial insemination and valuable genetics for working livestock dogs.

Additional Areas of Concern

Livestock SA also highlights the following areas of concern with the proposed Standards and Guidelines for Breeding Dogs and Cats.

- **Veterinary Relationship requirements (S5.4.4)**

Livestock SA supports strong animal welfare outcomes and recognises the importance of veterinary advice. However, the requirement for owners to establish a formal relationship with a veterinarian who can attend their animals and advise on disease prevention may be difficult for many producers. Access to veterinary services in rural and remote areas can be limited, with some regions experiencing workforce shortages and long travel distances for veterinary attendance.

For the past five years, veterinarians have been listed on the Occupational Shortage List for South Australia, highlighting a significant workforce deficit.¹ This is supported by the Australian Veterinary Association (AVA), which has identified systemic workforce challenges including almost 50 per cent graduate migration out of the state after graduation.²

Further research conducted by the University of Adelaide revealed that 68 per cent of veterinarians in South Australia work in small animal practice.³ This highlights a significant workforce imbalance, with a shortage of veterinarians in rural and regional areas placing additional strain on livestock producers and essential animal health services across the state.

As a result, working livestock dog owners may not always have consistent access to a veterinarian who can regularly attend their animals.

- **Euthanasia Requirements (S5.5.1)**

The proposed requirements relating to euthanasia will create impractical administrative and logistical burdens for livestock producers across the state. Working livestock dogs are often kept in rural environments where urgent decisions may need to be made to prevent unnecessary suffering. Requiring prior veterinary approval and written certification within seven days may not always be feasible where veterinary access is limited or where immediate action is required.

Livestock producers already operate under the *Animal Welfare Act 1985*, which requires animals to be humanely euthanised when suffering cannot be alleviated. Regulatory settings should recognise these practical realities and avoid creating requirements that may delay necessary welfare decisions or impose disproportionate administrative obligations on working livestock dog owners in agricultural settings.

Recommendation 4:

The Standards and Guidelines recognise the circumstances and practical constraints faced by producers in rural and remote areas and allow reasonable flexibility where veterinary services are not readily accessible for producers who own working livestock dogs.

¹ Australian Government, Jobs and Skills Australia. <https://www.jobsandskills.gov.au/data/occupation-shortages-analysis/occupation-shortage-list>

² Australian Veterinary Association, Veterinary Workforce Survey 2023-24 Analysis Report, https://www.ava.com.au/siteassets/advocacy/workforce-survey/ava-2023_2024-workforce-survey-report.pdf

³ <https://www.adelaide.edu.au/alumni/ua/media/5247/rva-sa-workforce-survey.pdf>

2. Limit on number of fertile females

Livestock SA supports the proposed maximum limit of 50 fertile females (dogs and cats) per breeding program, noting that a breeder's licence will specify the number of fertile females that a breeder is authorised to keep as part of their breeding program or facility.

3. Dog and Cat Management Regulations

Upon reviewing the draft Dog and Cat Management (Breeder Reforms) Regulations 2025, Livestock SA wishes to raise the following key points regarding exemptions to microchipping and desexing dogs, along with the power to seize and detain cats.

- Amendments to Regulation 10

Livestock SA does not support the removal of provisions that allow extensions of time for microchipping dogs. In regional and remote areas, access to veterinary services can be limited and travel distances significant, which may make it difficult for breeders to meet prescribed microchipping timeframes. Removing the ability to grant extensions may therefore create unintended compliance challenges for responsible breeders of working livestock dogs.

Recommendation 5:

Retain provisions that allow extensions of time for microchipping working livestock dogs where access to veterinary services or geographic constraints limit the ability to meet prescribed timeframes.

- Amendments to Regulation 16

Livestock SA supports amendments enabling councils to seize an identified cat where local by-laws require cats to be controlled, secured or confined.

These provisions strengthen the onus on owners for responsible animal management and support improved protection of native wildlife and biosecurity in regional areas.

Effective feral and uncontrolled cat management remains a significant issue for the livestock sector, particularly due to the spread of parasites such as *Toxoplasma* and *Sarcocystis*, which can have considerable impacts on livestock health and production.

These parasites can cause reproductive losses in sheep and other livestock and are recognised as significant agricultural and wildlife disease risks.

Livestock SA supports practical and effective legislation that improves the management of feral and uncontrolled cats and reduces the damage they cause to South Australia's livestock industries and native wildlife.

Where councils impose by-laws requiring cats to be controlled, secured or confined, these amendments will support improved compliance and enforcement. However, ongoing engagement is important in areas where such by-laws are not in place, to ensure producers are supported to effectively manage cats within one kilometre of their residence and mitigate associated risks to livestock.

4. Recognition of Working Livestock Dogs in the Breeder Reforms Framework

Livestock SA encourages the Department to ensure that the breeder reforms appropriately recognise the distinct role of working livestock dogs within agricultural production systems.

The primary policy objective of the breeder reforms is to strengthen animal welfare outcomes and prevent large-scale commercial breeding operations commonly referred to as ‘puppy factories’.

However, the breeding of working livestock dogs by primary producers occurs in a fundamentally different context to commercial companion-animal breeding. Working livestock dogs are typically bred in small numbers within farming operations for the purpose of maintaining proven genetics, temperament and stock-handling ability required for livestock management.

Working livestock dogs play a critical role in supporting livestock welfare and farm productivity. Well-trained working dogs allow livestock to be moved calmly and efficiently, reducing stress on animals during mustering, yard work and transport preparation.

For many livestock enterprises, particularly those operating across large pastoral or extensive farming systems, working dogs are an essential management tool that reduces labour requirements and improves safety outcomes for both livestock and handlers.

Regulatory frameworks designed to address intensive companion-animal breeding operations may therefore create unintended consequences if applied without appropriate consideration of agricultural working dog breeding practices.

We encourage the Department to ensure that the breeder licensing framework and associated standards explicitly recognise the circumstances of genuine working livestock dogs kept by primary producers.

Recommendation 6:

The breeder licensing framework, standards and guidelines, and associated regulations should include explicit provisions recognising working livestock dogs kept by primary producers and ensure that regulatory settings designed for commercial companion-animal breeding operations do not unintentionally restrict responsible breeding practices within agricultural production systems.

Livestock SA appreciates the opportunity to engage in this consultation on ‘Breeder Reforms: Standards and Guidelines, Limits and Regulations for dog and cat breeders’ and looks forward to continued engagement with the Department. We welcome further opportunities to provide input to ensure the final framework appropriately considers the needs of the livestock sector in the context of working livestock dogs and cat management across South Australia.

Please contact the Livestock SA office on (08) 8297 2299 or via email at admin@livestocksa.com.au if you would like to discuss this submission further.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Travis Tobin', with a stylized flourish at the end.

Travis Tobin
Chief Executive Officer