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To: [Puppy Farming](#)
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Subject: comments in response to the Stop Pully Farming Consultation Paper
Date: Monday, 11 June 2018 12:30:33 PM

Thank you for putting the consultation paper together and for the opportunity to consider the proposed changes to the Dog Act. I have been a dog enthusiast who has been involved in all aspects of dog ownership for over 30 years, including competitive dogs sports (obedience and agility) and conformation shows. I have also been a registered dog breeder since 1996. I think it is important to understand that breeding dogs has never been for the purpose of supplying dogs to the public or for the purpose of making money but rather because I believe the breed itself was worth preserving and because it provided me with future dogs of that breed to enjoy and compete with.

Please find some responses to your consultation paper below:

8. How will a centralised registration system benefit you?

For pet owners, a centralised system is a good idea as it can help track dogs that might be moved across councils or even states. However, these systems are only as good as the people willing to register their dogs and it is well known that many pet owners simply do not do this. How would you ensure all pet owners registered their dogs? Enforcing such a scheme is likely to be very costly and very intrusive in people's lives and I imagine would be met with significant resistance.

9. Do you think it is reasonable to increase dog registration fees for dogs that are not de-sexed to encourage de-sexing?

No. The people who are not desexing are usually the ones who are not registering either, or don't care about desexing for any number of reasons - the costs would not encourage them to desex. I think you would only encourage people to avoid registering rather than encourage them to desex. The fees are disparate enough already to encourage desexing for those people who are honest enough to register their dogs.

10. Do you support increasing dog registration fees to fund a streamlined centralised registration system and to fund enforcement activities?

No. Many people already struggle to manage household debts and pet related costs. As mentioned previously, this would be very difficult and expensive to enforce and would require significant increases to fees. Again, the irresponsible dog owners who do not register their dogs in the first place would likely continue to avoid doing so, and thus the cost would be borne by those that are already trying to do the right thing, with no actual impact on sterilisation rates.

11. Do you think it is reasonable for dog breeders to pay an annual registration fee to cover the cost of monitoring and enforcing dog breeder compliance?

Registered breeders already do this. Dogswest charges annual fees off individuals, and collects money from all competitors via the clubs. I imagine it would be reasonable to add a small fee (say \$10 per breeder/year) which could be passed on to local governments to assist with costs of enforcing a system that was targeting the right people should the council establish a mutual working relationship with Dogswest regarding this issue. Dogswest already has a system for monitoring breeders and we have a strict code of ethics to ensure the wellbeing of

our dogs. It would seem prudent for the council to allow Dogswest to manage/oversee the registration of breeders. The only difference would be that Dogswest does not support the breeding of cross breeds, so no 'breeders' of mixed breeds would be registerable. A large number of the shelter dogs are cross breeds from irresponsible dog owners or people deliberately breeding 'designer dogs' (cross breeds) just for the market. Thus, refusing registration would help prevent these practices and be more easily enforced as any advertisement of cross breed would attract attention; or if this was to be allowed, then requiring registration via Dogswest (note, they would have to amend the constitution to enable it) it would at least ensure the owners of the dogs (provided they were registered) would be held to suitable standards for health and wellbeing and the breeders had some understanding of how to select appropriate homes.

13. Should there be any restrictions on who can register as a dog breeder? If so, what should these be?

Yes. As mentioned above, breeders should need to demonstrate a willingness to prioritise the health and wellbeing of their breeding dogs, have some demonstrated understanding of how to raise healthy and well-adjusted puppies, and be registered with the state governing body, Dogswest. Many unwanted dogs are bred by well-meaning but generally poorly educated pet owners who 'just want that one litter' or 'just want the kids to see the miracle of life'; or are bred by someone too lazy, too poor, or too inconsiderate to sterilise their pets. A truly dedicated and responsible breeder cares about preserving the breed itself and cares deeply for their dogs. We put in very large sums of money to ensure the health, temperament and soundness of the dogs as best we can predict, we study pedigrees to try and ensure the right combination of genes, and we raise the pups in a home environment – not in a kennel – ensuring the pups are socialised and exposed to a range of household sounds and experiences before they go to their new homes. Good breeders spend hours interviewing prospective owners, preparing them for what to expect and ensuring they are willing and able to manage it. We are not afraid, and in fact frequently, say no to buyers who seem unsuitable as an owner at that time – sometimes we work with them to prepare them for a later litter, sometimes we help them understand that this breed might not be the best option for them. But we don't just sell the pup because we can and they have money. This is the key difference between a backyard breeder or puppy farmer, and a responsible breeder.

"Dogswest Code of Ethics"

2.16 A member shall breed primarily for the purpose of improving the quality and / or working ability of the breed in accordance with the breed standard, and not specifically for the pet or commercial market. A member retains the right of free trade, to advertise directly and sell dogs not kept for line maintenance purposes by that member."

14. Do you think local government is best placed to enforce dog breeder registration? Why, or why not?

Not at all – local government personnel are often not sufficiently trained to be able to make the judgement on who should or should not be awarded registration as a breeder. They would need to rely on written guidelines or standards which usually end up too black and white. You already have an official and closely governed body that has authority, skills and capacity to make this judgement, and resources to support aspiring breeders to work towards meeting their standards for registration should they fall short. Dogswest is the best option for determining

breeder registration status.

15. Should people who breed dogs have to comply with minimum standards for the health and welfare of their dogs?

Absolutely – refer to Dogswest Code of Ethics... pertinent examples below:

2.8 Members shall constantly strive to improve their knowledge of their chosen breed or breeds, and their knowledge of the requirements for the care, welfare and betterment of dogs.

2.9 Members shall ensure that all dogs under their control are properly controlled, housed, fed, watered, exercised and receive veterinary care as and when required. A member shall not knowingly allow any dogs under their care to roam at large.

2.24 A member shall take responsible action to reduce the incidence of hereditary diseases in accordance with the ANKC Code of Practice for Hereditary Diseases.

2.25 A member shall not, within Australia, sell or otherwise transfer from that member's care any puppy under eight [8] weeks of age without the approval of the member's Member Body. Puppies are to be microchipped and vaccinated prior to leaving the Member's care.

2.26 A member shall not export a puppy under the age of eleven [11] weeks, or such greater age permitted under the livestock import requirements of the country to which the puppy is being exported.

2.27 A member shall not knowingly sell a dog to any person residing in an overseas country known to be involved in the utilisation of dogs for the meat trade without first satisfying the member's Member Body that the purchaser is a member of an ANKC recognised canine controlling body in the overseas country. The member and purchaser must further acknowledge in writing to the member's Member Body that the intention of the sale is for the improvement of the quality of that breed in the overseas country, and not for any other purpose.

2.28 A member shall ensure that persons acquiring dogs from that member understand the requirements for the care, welfare and responsible ownership of the dog, and that they have the time and facilities, e.g. adequate fences, sufficient room and proper shelter, to fulfil their responsibilities.

2.29 A breeder shall be expected to maintain reasonable contact with the purchasers of dogs from that breeder and to offer continued advice and reasonable assistance.

2.30 A member must register all puppies bred by that member that are living at the date of registration. Such registration must include all living puppies from the litter on the one litter registration application form and must be applied for within six [6] months of the date of whelping.

2.31 A member shall provide to all recipients of dogs sold or otherwise disposed of by that member, written details of:

2.31.1 The breed characteristics;

2.31.2 Current Vaccination certificate signed by a Veterinary Surgeon evidencing that the dog has been immunised against Canine Distemper, Hepatitis and Parvo Virus

2.31.3 Microchip number verification – transfer is the responsibility of the vendor in accordance with R19.

2.31.4 Responsible dog ownership information; and

2.31.5 All documentation required by the member's Member Body, including

2.31.5.1 a written receipt clearly stating whether the dog was sold with or without a Certificate of Registration (Main or Limited) - "with or without papers" shall mean the Certificate of Registration

2.31.5.2 any other conditions of sale and/or agreements (04/17)

2.32 A member shall not incorrectly describe nor knowingly misrepresent the characteristics of a breed.

2.33 A member shall ensure that all dogs sold or disposed of by that member are in the best possible state of health. Where a dog with a health issue or disability is disposed of the member must obtain from the recipient written and signed acknowledgement of the condition of the dog.

2.34 A member shall not:

2.34.1 Sell or dispose of a dog to a commercial pet wholesaler or retail pet shop. Nor shall a member's dog/s be advertised, displayed or sold on commission by a commercial dog wholesaler or retail pet dealer. [07/15]

2.34.2 Allow a dog owned by that member to be given as a prize or donation or to be auctioned.

17. Should the number of litters that a bitch can produce be restricted by law?

Absolutely, refer to Dogswest Code of Ethics, pertinent points below:

2.17 A member shall not breed with a bitch unless the bitch has reached adequate maturity for that breed as determined by the member's Member Body. The minimum breeding age for bitches across all breeds is twelve (12) months at the time of mating. Except in extenuating circumstances or with the approval of Governing Council prior to the mating, a member shall not breed from any bitch causing it to be mated before it is twelve months of age. 08/14

2.18 A member shall not breed a bitch causing it to whelp more than twice in any eighteen month period without the prior approval of the member's Member Body. (07/16)

2.19 Number of Litters

2.19.1 A member shall not breed a bitch causing it to whelp more than five (5) times.

2.19.2 It is the responsibility of the current registered owner to verify the number of litters a bitch may have had prior to their ownership of said bitch.

2.19.3 Extenuating circumstances

2.19.3.1 A member may apply to Dogs West for permission for a sixth (6th) litter.

The application is to include:

- a veterinary certification of fitness for further breeding issued in the last 30 days
- the positive identification of the bitch – microchip
- reasons for the need for a sixth litter

2.19.3.2 The member must have obtained written permission for the sixth (6th) litter

PRIOR to mating the bitch

2.19.3.3 The permission is valid for a period of six months – after this permission must be re-applied for.

2.19.3.4 A copy of the veterinary certificate which clearly identifies the bitch as being sterilised is to be supplied within six months of the litter registration being

lodged.

2.19.3.5 Under no circumstances will the registration of a seventh (7) litter be permitted. (04/17)

2.20 Maximum Breeding Age

2.20.1 A member shall not mate a bitch over the age of seven (7) years.

2.20.2 It is the responsibility of the current registered owner to verify the number of litters a bitch may have had prior to their ownership of said bitch.

2.20.3 Extenuating Circumstances

2.20.3.1 A member may apply to Dogs West for permission to mate a bitch over seven years of age. The application is to include:

- a veterinary certification of fitness for further breeding issued in the last 30 days*
- the positive identification of the bitch – microchip*
- reasons for the need for a litter from a bitch of this age*

2.20.3.2 The member must have obtained written permission PRIOR to mating the bitch

2.20.3.3 The permission is valid for a period of six months – after this permission must be re-applied for.

2.20.3.4 Under no circumstances will permission for a further litter be granted. (04/17)

18. Should people who breed dogs for commercial gain be required to meet additional Mandatory Dog Breeding Standards?

These are NOT breeders!! People who breed dogs for commercial gain are puppy farmers!

19. If you said 'yes' to question 18, should this be based on:

a. keeping a defined number of breeding dogs?

The number of breeding dogs does not determine whether the dogs are being bred responsibly. I've known breeders with very large kennels who are highly responsible and caring (responsible breeder), and breeders with just two dogs who were breeding only for money and didn't care where the pups went (puppy farmer or BYB). If you want to eliminate puppy farms, this will not help you

If the purpose of this legislation is to reduce puppy farming, then I feel this is targeting the wrong people. Pet owners who breed their dogs without the understanding and skills needed to ensure their pups are healthy and placed in the right homes do need to be stopped/reduced as many of these animals end up in shelters. Similarly, people breeding 'designer dogs' deliberately crossbreeding for a particular market also need to be stopped as they also often do it without the understanding of how to raise healthy, well-adjusted puppies and find suitable homes. These types of 'breeders' could be considered 'backyard breeders' but they are not really the same as a 'puppy farmer' who's sole purpose is to breed and sell puppies for money (like livestock) with little or no care or regards for the health and wellbeing of the pups or the adults they keep. To reduce BYB we need better education and systems to encourage but not enforce sterilisation (like subsidising vets so they reduce the cost of sterilisation). My concern is your proposed system would make it difficult or impossible for responsible breeders to continue, and have little or no impact on the back yard breeders. In addition, rather than stopping puppy farming, you would actually encourage large scale breeding

operations (under the “commercial” label) which is exactly what a puppy farm is (ie breeding for the market) because demand would increase due to a reduction in dogs available from smaller, responsible breeders.

Regards,



Registered Breeder with Dogswest

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