



# **STOP PUPPY FARMING**

# **Public Submission Form**

Please use this form to provide your feedback on the State Government's proposed methods to stop puppy farming in WA. These questions are taken from the consultation paper released by the Department of Local Government, Sport and Cultural Industries on Thursday, 3 May 2018. The paper can be accessed at <a href="the-bepartment's website">the</a>

The information you provide will be used by the Department of Local Government, Sport and Cultural Industries (DLGSC) to inform policy decisions regarding stopping puppy farming in WA. If you need help completing this form, please telephone DLGSC on (08) 6551 8700 or toll free for country callers on 1800 620 511, or email puppyfarming@dlgsc.wa.gov.au.

For a Translating and Interpreting Service (TIS) telephone: 13 14 50. To ensure your input is considered, please return your feedback before the consultation period closes at 4pm on **Friday 3 August 2018**.

### Your contact details

Title:	Mr 🗆
	Mrs ⊠
	Ms □
	Other □ Enter title here.
First name:	
Surname:	
Street or postal address:	
Telephone (business):	
Mobile telephone:	
Email address:	

# **Stop Puppy Farming Questions**

Please indicate if you are any of the following:					
<ul> <li>Dog Owner</li> </ul>					
<ul> <li>Dog Breeder</li> </ul>					
<ul> <li>Pet Shop Owner</li> </ul>					
<ul> <li>Pet Business – please specify below</li> </ul>	$\boxtimes$				
<ul> <li>Local Govt. employee</li> </ul>					
<ul> <li>Local Govt. elected member</li> </ul>					
<ul> <li>Shelter organisation employee</li> </ul>					
<ul> <li>Shelter organisation volunteer</li> </ul>					
<ul> <li>Rescue group employee</li> </ul>					
<ul> <li>Rescue group volunteer</li> </ul>					
Foster Carer					
<ul> <li>Veterinarian</li> </ul>					
<ul> <li>Other – please specify below</li> </ul>					
BOARDING KENNEL, GROOMING SALON, DOG BREEDER					
OWNER/PROPRIETOR SINCE 1992					
A DOGS WEST MEMBER AND REGISTERED BREEDER SINCE 1984					

### **Transitioning Pet Shops to Adoption Centres**

2. Would you purchase a behaviour and health checked rescue dog from a pet shop?

NO, I cannot see how selling a rescue dog through a Pet Shop is the answer, there are too many issues that would have to be addressed. What happens if the dog does not settle with its new owners?, attacks someone, becomes a destructive dog in the home or yard, a constant barker, not house trained, the list is endless, what follow up contact will be in place?, will the property be inspected or the new owners screened to see if suitable, especially for a big breed?, what happens if the new owners are allergic to it Who is an animal behaviourist qualified with a degree to assess these dogs, there are no courses established or available in Australia for this role, just obedience. Where are the dogs going to live and how will they be displayed in a pet shop during the day, after hours and weekends/public holidays. Who in a pet shop as an assistant would qualified to be advising the potential new owner/s that the dog is suitable for a family with a number of noisy children. You couldn't display live adult dogs in a pet shop. What criteria in assessing a pet shop as being suitable to sell rescue dogs would be put in place and who would manage the pet shops to see that they are meeting the required guidelines, if Councils would be managing this role, who would be training their Rangers on how to assess these shops and what penalties would be in place if they don't meet the guidelines or regulations. What restrictions would be in place regarding the cost of these rescued dogs sold via pet shops

3. What background information would you want on the rescue dog?

\*Why is it in rescue. \*Is it house trained \*Does it jump fences \*Is it dog aggressive \*How does it get on with children \*Is it lead trained or does it pull, especially a large dog \*Does it bark a lot. \*Is it destructive around the home \*Was it a house dog before or an outside dog \*Does it challenge authority \*Is it a digger \*What state did the dog come from. \*Is it from the country or local to WA \*Does it have allergies – skin issues \*Does it have food allergies \*Has it got bad teeth \*Has it got ear problems \*Has it got a vet history record \*Is it sterilised \*Has it had any major surgery \*Does it suffer from joint problems arthritis etc. \*Has it been assessed for Hip Dysplasia or Elbows \*Does it have an eye certificate or eyes checked for cataracts or other eye problems

4. Do you think transitioning pet shops to adoption centres is beneficial?

NO, Rescues are involved with the dogs they have on site, they meet the people looking for a dog and can immediately assess them as suitable owners for a rescued dog. What prices for a dog that is sold through a pet shop is going to be charged, the people buying a rescue dog can ask all the questions they want about the dog and so can the rescue people ask questions of the potential new owners. Many pet shops employ young people as sales staff who would not be qualified to discuss the different breeds or cross breeds about the traits they may have or have knowledge of the dogs and specific breeds, who would train them to be able to feel the people asking the questions are suitable

5. If you are a pet shop owner or operator, what impact will this have on your business?

Loss of income due to not being able to sell puppies, a GOOD IMPACT – I am not a pet shop owner and do not support a pet shop selling puppies with young puppies locked in a hot shop for days on end with no socialising or outdoor facilities and charging huge prices for mongrels that has created the demand and created puppy farms as the supplier. NO puppy or adult dog should be transported from another STATE into WA to bypass the system to supply pet shops

# Mandatory dog de-sexing for non-breeding dogs

6. How do you feel about mandatory dog de-sexing for non-breeding dogs?

NO – No thought has been given to the growth and development especially of larger breeds in the Mandatory time frames given, Growth plates in dogs vary hugely from small breeds to Giant breeds. The health and development of the various breeds would be compromised, there are some breeds that if sterilised young can be incontinent, what a miserable life they would have let alone the owners high vet bills and the dogs lifelong medication. This has gone beyond advisory stupidity by people that have let emotion out way fact, there is enough information that can be read and enough qualified vets outside of those involved in this suggestion of mandatory desexing that are practicing vets not just academics who think they are above them. I as a breeders since 1984, sell my puppies on a condition of sterilisation, I do not waiver it for anyone, they are a breed that can be done at 5 months males and 6 – 9 months for bitches, my choice as I do not want my breed that is popular as a Designer Dog - crossed with anything to create a mongrel to be exploited as a puppy farm.

7. Exemptions from mandatory de-sexing will apply for health and welfare reasons as assessed by a veterinarian, and if the dog owner is a registered breeder. Are there any other reasons why a dog should be exempt from being de-sexed?

Farm Working Dog Breeds, Dogs used in breeding for the Vision impaired for PTSD, Police Dogs, Sniffer Dogs and Search & Rescue, Show Dogs, Dogs West members who have to abide by a very strict Code of Ethics and Regulations, pass an exam to hold a Prefix to be able to breed and register their puppies, Dogs West has heavy governance for those that do not abide and are punished via very heavy fines in the \$1000's, they have stricter rules and larger fines than the RSPCA or Council's, you also risk possible suspension and disqualification and loss of membership, if you are charged and convicted of animal cruelty in a court of law, you get life suspension. Being a member of our Australian National Kennel Control, the controlling body and register of all Pedigree Purebred Dogs has been our right to exhibit, participate in Agility, Obedience, Lure coursing, Herding and sell our stock to overseas breeders and fellow dedicated owners with our hobby, many of dogs born in Australia participate in other countries around the world, many Australian ANKC Dogs West members import dogs from overseas to ensure the health of their breeding programs. it is a lifelong commitment for many, ours since 1984. Breeders of certain breeds would see their chosen breed disappear, they would become extinct due to the loss of breeding stock, a number of the breeds owned by Dogs West members are already on the vulnerable list. Dogs owned by people dependent on continuing to ensure the future of these breeds. Imported dogs by breeders costing thousands of dollars

8. Should mandatory dog de-sexing apply to all dogs, including existing dogs, or just dogs born after a particular date?

Mandatory des sexing should not apply full stop. To introduce such a regulation will not stop Puppy Farming, the Cat fraternity can attest to that, breeders will just do as they are now, go underground and still breed as the cat breeders have The management of ensuring that puppies are sterilised would be untenable and the cost to Councils exorbitant, including the Government, owners would bypass the system of registering their dogs, there would be dumped dogs. The expense to elderly owners, families that couldn't afford it unless Government subsidies are put in place. The burden of a breeder to do this before selling would see a decline in health of dogs so an added burden to the new owner in years to come via vet bills due to the effect on the dogs development. The management of this would again cost the Government millions employing the man power to monitor this program the same with Local Councils, monies they both do not have, the logistics of managing this is mind boggling. Is the Government then wanting vets to be the Police and report any entire dogs to the body established to ensure this regulation is carried out. Another ill thought out emotional idea

# **Centralised Registration System**

9. How will a centralised registration system benefit you?

It would not benefit me. I agree the base idea may have its merits, however being managed is another question and the cost. More to the point however is, who would be able to access it and use it for what purpose, other than what it is supposedly being set up for. What details will be available on it to be shared and by whom. Privacy Act, what would be in place to ensure the system is not used for other purposes than locating owners of lost dogs. Can it be downloaded or would those wanting to access it have to register first and who would screen them. Staff employed by vets, rescues and other organisations have a change of staff on a regular basis, could they then access this base via their own computers with the same access code they have taken with them from their previous employer. It would not benefit me. The cost again to set up a Government monitored system would incur huge costs just to establish and manage it to our already cash strapped Government

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

Yes □	Unsure □
No ⊠	

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

No, I believe that the cost involved in setting up and managing this system would be so outrageous that costs would penalise every genuine pet dog owner and we would see a huge surge in dumped dogs by families that cannot afford any further increase in their budget to fund a Government instigated regulation. If the Government can't afford to fund it why should the hardworking dog owner contribute. The Government is attacking the rights of every pet owner who are not Puppy Farms but genuinely own a family pet. Who would receive these increase, Councils will raise their fee exorbitantly to be able to manage and increase staff to manage the regulations set in place by the Government. So much of the ideas that have been raised, are ill thought out by emotional people such as Oscars Law and those associated with it that it has now gone beyond stopping Puppy Farms and Sales of Pups though Pet Shops, it is now attacking the pet owners that may have had their dog for years. These ill conceived ideas have not been advertised to the general public on what effect it will have on them, he has been advertised as Stop Puppy Farming, yet you have not seen many adverts pointing the pet owner to where they may read this material

12. 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?

Absolute NO for a Dogs West member. I pay a licence fee to our Council to operate our Kennels, I get a licence sent out with the number of dogs I can house on my property. I pay our ANKC Dogs West a fee to be a member that entitles me to breed, register my puppies, participate in the many affiliated club events I want to, who would I be paying this fee to? Under what conditions would the monitoring and enforcing us to be compliant for what. Who would be inspecting us to ensure we are compliant, the RSPCA who cannot manage their own business properly and have volunteers as inspectors that have no idea of the current Animal Welfare Act and try and become self opinionated and bullies and threatening, who would train them. Would Councils have to employ fully trained staff to inspect us and what courses would they have to undertake to ensure they are qualified to assess. The current RSPCA adverts are seeking funds to increase their inspectors, what qualifications do they have to have to monitor and enforce dog breeder compliance, none, same as council rangers. What role will the Government be taking to ensure that these inspectors are qualified. Any breeders should be registered with a council if they have a number of breeding stock above the council allowance and pay a council licence fee Councils already have in place the number of dogs that can be kept at a residential suburban property, they also have a clause as to the age limit puppies can remain at that home.

13. Are there any other benefits, costs and/or issues associated with breeder registration that are not captured in this table? Please detail.

There are no benefits to a breeder, it just appears to want to create cost after cost in the hope of stopping indiscriminate breeding. If the Government or Councils cannot employ enough internal and external staff to manage what they want to implement, which at the moment seems to be grasping at thin air, what would breeders be paying for, there are no benefits

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

They should be a members of an ANKC – Dogs West organisation, a sound registered Breed Club, where they have a strict Code of Ethics and breeding regulations. The management of puppies would then be targeted at a known pure breed dog rather than a Designer Dog mongrel. Dogs West – ANKC have strict health test requirements for many many breeds before they can be registered, these health certificates have to accompany the litter registration along with the microchip numbers of the puppies before they can be registered. Dumped dogs are mainly mongrels touted as Designer Dogs, no health checks, no known hereditary problems and more to the point no accountability. Vets should be stopped from recommending mongrels unless they are health tested like Dogs West members and Breed Clubs are, some even breed and sell them.

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

NO, they have neither the resources nor the knowledge or the staff. This is an open question as it does not state if they are being licensed to breed and if so what criteria will it take place when most councils if not all, have a limit on the number of dogs they can have on their property currently. Would this no mean that councils will be encouraging residents who are not members of Dogs West or a sound Breed Club affiliated with Dogs West to set up breeding from home. I live in a Kennel Zone, so I will not have any impact on a suburban resident, I am licensed by our Council, I am a Dogs West member since 1984., if licensed and a breeder in a suburban home how will council act on complaints, some breeds of dogs have upto 14 pups and most are large breeds, stamping out Designer Dogs should be the target so not making puppy farms viable

# **Mandatory Standards for Dog Breeding, Housing, Husbandry, Transport and Sale**

16. Should people who breed dogs have to comply with minimum standards for the

health and welfare of their dogs?		
Yes ⊠	Unsure □	
No 🗆		
17. Should there be any should these be?	restrictions on who can register as a dog breeder? If so, what	
not health check. Those of neighbours approval, as we their neighbour to breed or	burely for money not for the better meant of the breed and who do do not have a licenced kennel permit. They should have to have we do in our kennel zone, that the neighbours agree to allowing or have an increased number of dogs. Anyone with a criminal cree without advertising there Council licence number	
18. Should the number of litters that a bitch can produce be restricted by law?		
Yes ⊠	Unsure □	
No □		
19. Should people who I Mandatory Dog Bree	breed dogs for commercial gain be required to meet additional eding Standards?	
certificates that marry u owner. Designer mong with breeds mixed toget State to State. Comme produced as most are n	alth testing all of their breeding dogs and have these p with the microchip number available to the potential puppy rels would be hard to manage as they have many issues ther. They should not be allowed to transport puppies from rcial dog breeders do not have a standard for their breeds nongrels with a fancy name. ANKC Dogs West members do rd, we also have to breed for the better meant of the breed	

- 20. If you said 'yes' to question 19, should this be based on:
  - a) keeping a defined number of breeding dogs?

- b) if so, what number?
- c) any other criteria?

### Please provide reasons:

This would depend on the facility they have and the breeds they are breeding, some dogs can have upto 14 pups. The number of breeding dogs should be on the condition of the number of fulltime staff employed to manage the dogs and their puppies, one staff member per 4 dogs. Stud dogs I would consider 4 and the number of bitches at 20 as they should only be bred once in 12 months so they should end up being rotated so would have only half of this number in whelp at the same time if managed properly and sufficient staff employed to monitor daily fulltime the mother and pups, clean kennels, feed and change water daily ensure the mother and pups have adequate bedding and sleeping facilities warm weatherproof kennels and exercise areas for the mum to go outside to exercise and empty out, the pups also not removed from the mother prior to 6 weeks and the kennels be more than large enough for the type of pups being produced

### Confidentiality

Your submission will be made public and published in full on the Department of Local Government, Sport and Cultural Industries website unless you ask for it to be confidential. Submissions that contain defamatory or offensive material will not be published.

Do you wish this information to remain private	and confidential: Yes ⊠	No ⊠
Signature:	Date:	

### Please return this form to:

Please return submissions by 4pm on Friday 3 August 2018

#### **Post**

Department of Local Government, Sport and Cultural Industries GPO Box 8349

Perth Business Centre WA 6849

### **Email**

puppyfarming@dlgsc.wa.gov.au

<sup>\*</sup> Attach further documentation if required.