

2nd August 2018

By Ashleigh Leece, Qualified Dog Trainer

Response to “*Stop Puppy Farming Consultation Paper*”

To Hon. David Templeman MLA, Lisa Baker MLA & The West Australian Department of Local Government, Sport and Cultural Industries.

Why my opinion matters:

I would like to take this opportunity to thank you for making the time to read this, and for allowing for my professional and experienced opinion to be heard. I am a qualified dog trainer and also a dog owner, as well as being a part of the meeting with Lisa Baker MLA that took place on the 4th of April 2018 regarding Animal Welfare Laws. I consider my opinion on this matter to be of great interest to your cause. Having worked with many dogs in rescue and with recently adopted dogs from rescue groups and shelters, I have seen the faults of current and proposed systems and the effects they have on dogs, the community and humans alike. While there is not a simple solution to the issue of over population of pet dogs and domesticated dogs, I believe that the “Stop Puppy Farming Consultation Paper” needs further consultation from more qualified industry experts, such as myself. I do not agree that rescue or dog shelter organisations are qualified enough to provide adequate feedback on all aspects of the consultation papers and the changes proposed, although I have been advised that other parts of industry have been consulted. While I am hoping my fellow qualified dog trainers in WA have completed a similar submission as mine, I feel the most reliable advice and feedback on this consultation paper will come from experienced dog trainers and Veterinarian Behaviourists (not just vets, as they are not appropriately qualified in behaviour), in particular from Dr Nicole Lobry de Bruyn and Ken Storrs. Please note that these two industry experts I am recommending may or may not agree with my points made below. While it is vital that we get things happening as soon as we can to improve standards of welfare for dogs in Western Australia, it is imperative that we go about it after adequate consultation from all parts of industry.

Please read below for my detailed outline for my advice and feedback on the “Stop Puppy Farming Consultation Paper”. For the points in the consultation paper that have not been addressed below, I agree with them as they are written in the document.

Item #	Measure/ Element	Page Reference	Issues and Anticipated Problems	Considerations and Advice	Other Key Notes and references
1	“the transition of pet shops onto adoption centres”	4, 11	<ul style="list-style-type: none"> - Dogs are still going to be ‘impulse purchases’ - Does not encourage thoughtful adoptions or dogs going to the right homes - People buying animals on face value, without considering long term commitments of owning a pet - No way to know the dog is going to a suitable home - Breeders will still breed dogs with health concerns and temperament concerns - Having dogs in pet shops is still not an idea environment for a dog to be kept for longer than a few hours - Dogs being kept in pet shops may develop behavioural issues and/ or health issues - Being in a pet shop will cause extra un- needed 	<ul style="list-style-type: none"> - Have specialised dog adoption centres, not pet shops - Create ideal environments for dogs to be kept whilst waiting for their forever home - Upgrade current rescue/ shelters to allow for people to go in especially to buy a pet - Dogs should not be adopted on face-value or appearance, they should be adopted based on their behaviour history, health conditions, training needs, size, management needs, temperament and personalities. - Dogs deserve better than to be treated like an impulse purchase 	<ul style="list-style-type: none"> - http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0172091

			stress onto animals (even behaviourally sound dogs can be ruined in these environments)		
2	“mandatory de-sexing of dogs”	4, 13	<ul style="list-style-type: none"> - Increase in dog bite risks - Increase in dog bite incidents - Increase in people “hiding” their dogs to avoid de-sexing - Not enough resources to make sure people do this - Increase in health problems - Increase in fear related behavioural problems - Increase in behavioural problems making dogs more difficult to rehome - Increase in dogs with lacking of confidence 	<ul style="list-style-type: none"> - De-sexing can have implications on dog behaviour and chemical changes resulting in lack of confidence and an increase in bite risks - Risks of early de-sexing - Health associated issues with de-sexing - In my experience de-sexing has most certainly not reduced problem behaviours in all dogs such as marking, roaming, fighting (males or females) or signs of heat in females. - In my experience I have noticed an increase in behaviours such as marking, roaming, and fighting (males or females). - De-sexing does not address or fix behavioural problems in dogs and should not be considered the only solution - Early de-sexing before the pup’s age of 6months can have serious implications on the social development and neurological development of the dog and is a very stressful procedure for puppies to go 	<ul style="list-style-type: none"> - https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4096726/ - http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0196284

				<p>through which may seriously affect the critical socialisation period for the pup's brain.</p> <ul style="list-style-type: none"> - Dogs and puppies should also be exempt from de-sexing if they have behavioural or neurological concerns and should be approved by a veterinarian behaviourist- Not just a vet 	
3	"mandatory standards for dog breeding, housing, husbandry, transport and sale"	4	<ul style="list-style-type: none"> - Breeders will still breed dogs with health concerns and temperament concerns (pugs, French bull dogs, mastiffs, etc) - Lack of resources to regulate standards and laws - Encourages people to "hide" their practices and send puppy farming underground and on the black market 		<ul style="list-style-type: none"> - http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0172091 - https://www.scientificamerican.com/article/although-purebred-dogs-can-be-best-in-show-are-they-worst-in-health/
4	" a targeted education program to educate consumers on where to source their puppies and dogs"	4	<ul style="list-style-type: none"> - Still common for people to want to breed their pets - Huge community and cultural change like this requires a great amount of work and I see this as a very unachievable idea - People go to unqualified people for advice 	<ul style="list-style-type: none"> - Program must be marketed properly and available to everyone - Program should be a mandatory step for people before they buy a pet - Program should be available to everyone 	<ul style="list-style-type: none"> - https://www.scientificamerican.com/article/although-purebred-dogs-can-be-best-in-show-are-they-worst-in-health/

			<ul style="list-style-type: none"> - The public don't know how to seek qualified advice - The public do not know the difference between qualified and non-qualified advice 		
5	"stop the cruel practice of puppy farming"	5	<ul style="list-style-type: none"> - This will send puppy farming underground and onto the black market - People are inherently hard wired to avoid pain and seek pleasure; people involved with puppy farming will "hide" dogs and avoid standards and laws and will find alternative ways to make profit from this industry - Some registered breeders run similar systems to puppy farms but will slip through the gaps as they are registered with DogsWest 	<ul style="list-style-type: none"> - There must be a system in place to reward or encourage people involved in puppy farming to transition into standard approved breeding, housing, husbandry, transport and sale or dogs, otherwise they will go underground. - We need to give the puppy farmers and chance to change their ways (suitable timeframe) - We need an education program for puppy farmers and breeders to make sure they can transition into the new standards. - Pushing people away only creates adversity and conflict and does not encourage co-operation - Regular audits must be conducted 	<ul style="list-style-type: none"> - https://www.scientificamerican.com/article/although-purebred-dogs-can-be-best-in-show-are-they-worst-in-health/
6	"Puppy farmers will not be able to supply and sell puppies to pet shops"	11	<ul style="list-style-type: none"> - This should also work the other way; Pet shops should not be able to buy puppies from puppy mills or puppy farmers 	<ul style="list-style-type: none"> - Strict set of guidelines to enable people and pet shops to identify which suppliers are puppy farmers 	

			<ul style="list-style-type: none"> - Needs to be made clear if puppies can be sourced from backyard breeders? 	<ul style="list-style-type: none"> - Strict set of guidelines and standards for where puppies can be purchased? (This quote is not clear if puppies can be sourced from backyard breeders?) 	
7	“Dog purchases online may increase as a result of consumers being unable to purchase dogs from pet shops”	12		<ul style="list-style-type: none"> - Selling and buying of animals online also needs a strict set of guidelines and standards - Also requires laws surrounding backyard breeding- Should be made illegal? 	
8	“ Dog Owners: All Dogs will be required to be de-sexed by the time they reach a particular age”	15		<ul style="list-style-type: none"> - This age should be 2 years of age where the dog has almost, if not already, reached social maturity - Consider the dog’s neurological development 	
9	Content of Mandatory Standards for Dog Breeding	26	<ul style="list-style-type: none"> - Breeding of dogs should be left to the experts and not to general dog owners - Still encourages backyard breeding - Veterinarians are not qualified to identify behaviour concerns or characteristics - No way to tell what genetics are being bred, genetics can be “hidden” for decades and appear in dogs many generations later 	<ul style="list-style-type: none"> - There should be a minimum age for when puppies can leave their mother - There should also be a minimum age for when pups can go to their new home - There should be a qualification for dog breeders to be encouraged to complete (Certificate 2 or 3 in companion animals TAFE) - People who can register as a dog breeder must be qualified in companion animal studies or vet studies or similar. Breeding 	<ul style="list-style-type: none"> - https://animalstudiesrepository.org/cgi/viewcontent.cgi?article=1000&context=acwp_cdbpm - http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0100767 - https://bmcbiomedcentral.com/articles

			<ul style="list-style-type: none"> - No standards for characteristics - No standards for undesirable genetics - No standards for socialisation techniques - Nothing mentioned about keeping of mother dog whilst pregnant (highly stressed pregnant bitches can produce highly stressed puppies) - No standards on the type of training methods to be used on dogs at all 	<p>is not for anyone and should be left to experienced or qualified people</p> <ul style="list-style-type: none"> - Veterinarian behaviourists should be the qualified persons to identify behaviour concerns, characteristics and should be very involved along the process for breeding certain dogs - Veterinarian behaviourists, animal behaviourists and qualified dog trainers should also have a role to play; especially in the behaviour assessments for breeding dogs, socialisation standards and techniques, training and management of breeding dogs, and management and environmental controls required for pregnant bitches - Veterinarians, Veterinarian behaviourists, animal behaviourists and qualified dog trainers should be consulted on guidelines for appropriate age specific exercise guidelines - The number of litters produced by a bitch should be restricted by law - People who breed dogs for commercial gain should be required to meet additional dog 	<p>/10.1186/s12864-016-2936-3</p> <ul style="list-style-type: none"> - https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3553070/ - https://pdfs.semanticscholar.org/8456/e233c0f18274fd955029db6bdca3789d8dad.pdf - http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0141907 - http://www.associationofanimalbehaviorprofessionals.com/vol4no1.pdf - http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0102722#s6 - https://www.journalvetbehavior.com/article/S1558-7878(17)30035-7/abstract
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				<p>breeding standards. (I am not experienced or qualified to answer the point for 19.)</p> <ul style="list-style-type: none"> - People who adopt or buy a puppy must be required by law to take their puppy to a puppy class and/ or consult a dog trainer or veterinary behaviourist to ensure public safety by implementing guided socialisation techniques and methods - Dog breeders should also be required to comply with strict environmental standards to ensure minimal negative impacts on the environment 	<ul style="list-style-type: none"> - https://lib.dr.iastate.edu/cgi/viewcontent.cgi?article=2838&context=iowastate_veterinarian - https://pdfs.semanticscholar.org/b666/41353d0f47f9c7fd45794db36c34b32e82bc.pdf
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