

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 [the Department's website](#).

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 <input type="checkbox"/> Mrs <input type="checkbox"/> Ms <input checked="" type="checkbox"/> Other <input type="checkbox"/> Enter title here.
First name:	Eleanor
Surname:	Hodgson
Street or postal address:	██
Telephone (business):	
Mobile telephone:	██████████
Email address:	██

Stop Puppy Farming Questions

1. Please indicate if you are any of the following:

- Dog Owner
- Dog Breeder
- Pet Shop Owner
- Pet Business – please specify below
- Local Govt. employee
- Local Govt. elected member
- Shelter organisation employee
- Shelter organisation volunteer
- Rescue group employee
- Rescue group volunteer
- Foster Carer
- Veterinarian
- Other – please specify below

I am a member of Dogs West and the Golden Retriever Club of WA (GRCWA).

I have served on the committee of the GRCWA and am currently the WA representative for the National Golden Retriever Council (the breed council which represents the interests of golden retriever enthusiasts in Australia).

I am not currently a breeder, but am considering it in the future.

I have two male golden retrievers who are my pets, whom I also exhibit at shows. We attend obedience classes and my older dog has obedience titles as well as his show championship title. I have previously owned a golden retriever bitch who was de-sexed after she turned 2

Transitioning Pet Shops to Adoption Centres

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

I would not. Firstly I have always preferred to purchase a purebred puppy from a reputable breeder who has bred and raised my puppy in their home. They selected the dog suited for me and who has remained my friend ever since.

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

1. I would want to know under what circumstances it has arrived in a "rescue" organisation and where it came from. If there was information on the dam and sire that would be something I'd want to see. 2. I would want to know how it had responded in a behavioural assessment by a credited dog trainer/dog behaviourist. 3. Is it friendly with dogs, cats and other small animals, whether it is comfortable to walk on lead around other dogs and people and 4. I would want a physical health assessment by a qualified vet.

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

I do not believe that selling “rescue dogs” through a pet shop is an appropriate way to rehome dogs. It is my understanding that dogs should be homed to appropriate homes. Not all breeds of dogs, however cute as puppies, are suited to all situations and all types of people. To ensure a successful adoption via a pet shop each potential purchaser would have to be assessed to ensure an appropriate match with the dogs in the possession of the store. As I see it pet shops that currently sell dogs and puppies sell to whoever has the money to pay. After all, pet shops are businesses run for profit. Dog “rescue” organisations should be operating for the good of the dogs that end up in their care. The cost of sale should only be commensurate with the cost of its care and not for profit. The combination of an organization that is not for profit and a retail outlet does not make sense to me and I believe the dogs will not benefit. Rescue organisations that opt to work with pet stores should be accredited and not for profit. Their activities should be monitored through inspections, and annual reporting. Pet shops should have to register with a relevant authority if they sell dogs. It should be an offence if they do not. Pet shops who agree to sell “rescue” dogs should maintain records of where dogs have been sourced from, the details of the new owners and details of the health and behavior checks. It is rare for dogs sold by reputable breeders who are members of an ANKC affiliated state body (eg Dogs West) to wind up in dog shelters or with a rescue organisation unless through extenuating circumstances. The reputable breeders I know check out their potential puppy people to ensure that their puppies will be well cared for and in appropriate homes. They stipulate that if for any reason the dog needs to be rehomed then the breeder should be the first point of contact. My dogs’ breeders have become life long friends providing me with support and encouragement in my endeavours with my dogs.

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

N/A

Mandatory dog de-sexing for non-breeding dogs

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

I do not support mandatory dog de-sexing and I absolutely do not support de-sexing of any dog before the age of 6 months. In the case of my breed (golden retrievers) it is recommended to wait until they have fully grown (1.5 - 2 years). In my breed there have been studies that show increased risk of joint issues such as ACL injuries in dogs that have been de-sexed before their growth plates have closed. Studies have also shown that there is an increased risk of contracting some cancers as a result of de-sexing (early or not). Early de-sexing of bitch puppies can result in some puppies having incontinence issues. It does also appear that the increased risk of contracting some cancers which de-sexing was once thought to reduce, has been disproven, such as mammary cancer in bitches and it could in fact be the reverse. To prevent the perceived "over breeding" concerns more effort should be put into promoting responsible dog ownership through dog training. A responsible owner should keep their dog safe and secure, train their dog to cope with living with humans, socialise it through dog training clubs and walking it where there are other dogs and people. Training assists in helping our canine companions to be mentally happy and content. An entire dog or bitch who is well cared for as I have outlined can not have a litter of puppies unless a conscious choice is made to do so by the owners. De-sexing does not necessarily fix behavioural issues and in some cases, for example, if the dog is lead reactive through lacking confidence, it can actually exacerbate the problems. If mandatory de-sexing is to become a reality then I recommend consulting with specific breed clubs to advise on suitable ages for de-sexing to ensure the health and well-being of their breeds.

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?

Members of Dogs West should be exempt from the mandatory de-sexing laws. I have two main reasons for this. Firstly, in order for me to participate in exhibiting my dogs in conformation shows they must be entire. I also must be a member of Dogs West which means that I agree to comply with a strict code of ethics around responsible ownership and care of my dogs and responsible breeding to maintain high welfare standards and health of my dogs and their progeny. As previously stated, I'm not a breeder so why should I have to register as one simply to keep my dogs intact so that they could be used at stud and to be exhibited at dog shows. Mandatory de-sexing will mean that only those who are breeders will be showing their dogs. This will impact on our hobby as numbers dwindle. Secondly, mandatory de-sexing quickly removes dogs that could potentially contribute to maintaining a healthy gene pool. Small breeders who cannot "run on multiple dogs from a litter" will sell puppies to families as pets and keep only one for themselves to carry on their breeding program. At eight weeks, when pups go to their new families there is still some luck in picking which pups will grow into the most quality. It is difficult to determine at that young age or even at 6 months if they are a non-breeding dog. Many stories exist of breeders who see one of their breeding a year later that they sold as a pet only to realise they kept the wrong dog. One big show winner in goldens several years ago was returned to the breeder due to a change in circumstances. He had been sold as a pet but on his return became a top show dog. So by enforcing people to have their dogs de-sexed before they have the chance to prove their potential choices and opportunities are limited and this will have impacts on the overall health of the breed population. This seems trivial, but careful considered breeding choices are removed very quickly with the de-sexing of an animal. I have two entire male golden retrievers. They have had a number of health tests which are mandatory under the GRCWA club code of ethics and also optional, including some genetic testing to prove they are sound for breeding. I am not currently a breeder, but under the proposed legislative framework I would have to call myself one to allow my boys to be available at stud and not be de-sexed. It seems that there has been some ideas floated in the supplementary paper that indicate primary producers are concerned that de-sexing their dogs at an early age means they will not be able to assess them for desirable traits that they would want to keep for breeding. That mandatory de-sexing could reduce the working dog gene pool. This reflects my statement above and applies to all breeds and reasons for breeding. I recognise that many primary producers' livelihood depends on their working dogs, however the preservation of many wonderful dog breeds that have special traits will be lost in much the same way. Many working dogs end up in rescue organisations, dumped in rural areas. So there are farmers out there who are contributing to the problem of dogs in shelters.

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

Whilst I do not support mandatory dog de-sexing, it should definitely NOT apply to dogs who are currently entire. I would not want my mature male dogs de-sexed now unless for specific health reasons. I believe it would be detrimental to their well being.

Centralised Registration System

9. How will a centralised registration system benefit you?

I am not against a centralised registration system, however as I already have lifetime registration with the council for both my dogs and am registered with Dogs West I do not see any current benefit to me. My dogs are micro chipped and my contact details are on a microchip register as well as that number being recorded with my council rego and with Dogs west. Puppies bred by members of Dogs West are registered with Dogs West with their microchip numbers and therefore can be traced to a breeder. The only benefit I see is that the possible issue of having to re-register with another council if moving towns/council boundaries is removed. I presume that there is not an issue with transferring to another council, but am yet to test this, but I would assume it would streamline things.

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

Registration fees for entire dogs are already significantly higher than for dogs that are de-sexed. I have never questioned this, however do entire dogs cost more to have their records maintained? Do they find their way into pounds more often than de-sexed dogs? Are they poorer canine citizens? Surely this should factor into the fee schedule. I would like to continue to see a lifetime registration option. Having to pay a fee every year for the privilege of keeping a dog, entire or not, is inconvenient. It will not make me de-sex them simply because of the cost and will penalise those responsible dog owners who want to do the best by their dogs, but are unable to meet the annual costs. Yes Unsure

No

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

If the reason that there is a lack of enforcement and monitoring of known breeders/rescue organisations and pet stores currently, then my answer is yes. If there exists a streamlined centralised system surely it would cost less to maintain and therefore does not justify increased fees.

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?

I do not think it is fair that people who want to keep their dogs entire for the purpose of showing them and/or potential breeding but are not breeders themselves are expected to register as breeders. What is expected for dog breeder compliance has not been outlined. I would want any dog I purchase from a breeder to be carefully raised with love in their home and if I was to become a breeder I would do the same. Should I really expect inspectors to come into my home to inspect my breeding set up? Large kennels with multiple breeds set up for commercial breeding will not, in my opinion, produce quality well adjusted puppies to live in someone's home and should be discouraged, but should most definitely be audited and inspected – as commercial boarding kennels are inspected and I would think that the cost of registering as a breeder would go towards the costs of ensuring compliance. I cannot see what else an additional breeder fee would be required for.

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

I see duplication between this new proposed centralised system of registered breeders and that already set up and maintained by Dogs West. Can the two be linked to enable Dogs West members to only have to worry about one set of registration? Our membership numbers to be used as a breeder number? Members of Dogs West who want to breed are required to apply for a kennel (breeder) prefix. They are required to pass a test on animal husbandry, standards to be maintained, how to keep records etc. What additional costs/rules/regulations should also be burdened on these breeders who are doing the right thing?

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

Anyone who is convicted of an offence under the Dog Act, Cat Act and Animal Welfare Act should not be allowed to register as a dog breeder or should have their registration cancelled. If someone has been convicted of an offence under Australian Consumer Law in relation to dogs they have sold or transferred their registration should be cancelled or refused.

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

Yes, as they are the ones collecting the annual registration fees. It should NOT fall to the likes of the RSPCA. Local government will have access to the information kept in the central database and I do not agree with additional parties having access to this.

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

Some care should be taken in defining minimum standards. My preference is to purchase a puppy that has been raised in a home with humans as this is how that puppy will grow up in my house as a companion animal to me and my family. In another state (Vic I think) legislation was put forward making the minimum standard a kennel run with concrete floor of a set size. This means that those breeders who needed to comply would have to build a kennel run even if their intention is to rear their puppies in the home.

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

Yes, anyone who has been convicted of an offence under the Dog Act, Cat Act, or Animal Welfare Act should not be allowed to register as a dog breeder. Anyone convicted of an offence under Australian Consumer Law in relation to dogs they have sold or transferred should also not be allowed to register as a dog breeder or renew.

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

Yes

Unsure

No

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

Yes.

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:

The number of breeding dogs should be kept to below 10. I don't believe in commercial dog breeding. This does nothing for the health of breeds and does not contribute to a broader gene pool as puppies are produced from the same combination of matings. A bitch must not have more than two litters in three years and should not have more than 5 in their lifetime. A bitch should not be bred from over the age of 5 unless assessed by a vet.

* Attach further documentation if required.

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: Eleanor Hodgson

Date: 3 August 2018

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