

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:	Katja
Surname:	Levy
Street or postal address:	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

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

Lawyer

Transitioning Pet Shops to Adoption Centres

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

No – it is not possible to determine with certainty what might trigger a dog that has an unknown history.

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

Having worked with children in foster care, there is simply not enough background information that you could get which would provide the necessary information

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

Pet shops should not sell dogs at all. Merchandise, food and equipment is sufficient.

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

Limited. Most pet shops do not depend upon dog sales for profitabilit

Mandatory dog de-sexing for non-breeding dogs

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

I am strongly against it, in particular for female dogs

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?

Yes – sterilisation of female dogs requires removal of the ovaries which produce essential hormones such as oestrogen which are important for a dogs growth, development and well being. In addition, there are some more recent overseas studies which appear to indicate that in about 50% of cases of sterilisation of a female, the dog has become more aggressive.

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

This makes no sense at all. The reasons for not sterilising a dog are the same for dogs that are born as they are for dogs not born yet

Centralised Registration System

9. How will a centralised registration system benefit you?

It won't. But its not a terrible idea, so long as it doesn't cost a fortune

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 The registration fees for unsterilised dogs are already significantly higher

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

No – Pets shops making a profit from selling dogs should fund this. Why should the customer, who makes no money from this at all, bear the financial burden

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?

They already pay an annual registration fee. And, registered breeders with DogsWest pay additional fees for enforcing breeder compliance.

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

The proposed changes will not stop puppy farming – it will simply move to GumTree and the like. Further, reputable breeders, registered with DogsWest will be significantly prejudiced. Most of these breeders are focussed on the betterment of the breed and showing. They sell only the puppies they do not wish to keep and have waiting lists between 1 and 2 years long. In particular, breeders of the smaller sized breeds (which routinely have litters of between 1 and 4 puppies) simply cannot produce enough puppies to make breeding an economic activity. Instead, they absorb the loss as a lifestyle expense for the pleasure of improving the breed standard and showing their dogs at weekend shows.

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

Such restrictions already exists within the DogsWest rules. DogsWest breeders are highly regulated and subject to very strict rules. When a breach of the rules is alleged, the Association investigates the allegation fully and has a sophisticated procedure that it adopts to hear and determine the evidence before making a finding and imposing sanctions.

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

I do not. Already there are significant inconsistencies with the way that the various local governments deal with dog issues – for example, registration fees are vastly different. Dog Breeders should be registered with DogsWest, which is a State based Association and is affiliated with the national Canine Association. The rules and procedures are uniform, certain and to that extent fair. Adding an extra layer of registration will simply add to public confusion and increase the likelihood that puppy farmers will continue while simultaneously crippling the meagre sales of the DogsWest breeders who are actively showing their dogs

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 restrictions on who can register as a dog breeder? If so, what should these be?

Restrictions and minimum standards already are in place for DogsWest members. No further restrictions or standards are required.

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?

The number of litters and breeding standards are already highly regulated through the DogsWest rules. These rules are consistent nationally and largely, internationally. They have been tested through implementation over a very long period of time and are focussed on the betterment of the breed and the health and well-being of the dogs. These rules and standards are sufficient, logical, reasonable and appropriate.

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 proposal present significant difficulty. Under DogsWest rules, a bitch may not have more than 5 litters and in any event she may not have any litters after 7 years of age. Puppies born in circumstances of a contravention of these rules will not be registered. Breeders who are actively showing regularly choose to continue showing their dogs after breeding with that dog is no longer permitted. However, under the DogsWest rules, only an entire dog may be shown. This puts the breeder in an invidious position where either they are required to dispose of the dogs they can no longer breed from or they must wait up to 10 years before they can replace the dog. The proposal is more likely to encourage underground behaviours or result in practices which are not in the best interests of the animals.

* 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: *K Levy*

Date: 13 June 2018

Please return this form to:

Please return submissions by 4pm on Friday 3 August 2018

Post

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