

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:	Kyl
Surname:	Betteridge
Street or postal 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

Transitioning Pet Shops to Adoption Centres

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

NO! Dogs should not be sold in 'Pet Shops' full stop.

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

Background information, firstly should apply to ALL rescues. Information should include (at minimum) where the dog was sourced from, FULL health check including genetic testing, predisposed conditions, breed specific conditions (e.g brackish breeds) and a requirement to disclose any issues whether obvious or that with 'potential' to develop based on early warning signs etc. Behaviour should also be assessed, both with regard to the dogs social abilities with other dogs, small animals, farm animals etc and their behaviour toward people men, women, children – even in some cases varied 'race' can be a factor. These tests should be carried out at a minimum by a trained vet, canine behaviourist and/or a combination of registered trained specialists – NOT just rescue volunteers or Cert III holders.

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

NO, not at all. We ultimately need to stop 'selling' dogs from shops. These places will profit – they will find a way to bring back unethical sourced dogs to feed a high demand and make a quick buck. Additionally, we will find undesirable 'pet owners' seeking out these dogs with no background testing or home view or similar because these 'shops' don't care about the genuine welfare of the dog, and purely see dollar signs for those walking in.

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

I'm not a Pet Store owner/operator, but the fact that this is a question is already an unethical way to deal with this legislation. The commercial viability of a pet store owner, should NOT outweigh the importance of the life of a dog, or hundreds of thousands of dogs to be precise. This should not be a material consideration to this review.

Mandatory dog de-sexing for non-breeding dogs

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

As an owner of sterilised dogs, I make a choice to sterilise, when my dogs and their bodies are ready – however, I wholeheartedly disagree with the mandatory desexing bill proposed to form part of this legislation. There is significant academic literature that demonstrates the risks associated with sterilisation, particularly when enforced before sexual maturity of the animal. Such practice brings on its own set of health and welfare complications for the dog, including debilitating weight gain, hormone imbalance leading to disease and injury such as cancer, incontinence as well as proven behavioural issues, stunted growth, bone, muscle, tendon and joint disorders. Not to mention the impact this will have on those ‘non registered’ breeders such as farmers or performance dogs owners. See below.

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?

Several. The literature alone provides adequate evidence to suggest that sterilisation between the ages of 3 – 9 months is not always in the best interest of the dog. It is ‘supposedly’ the ‘right thing to do’ but in reality many registered breeders – who are ANKC compliant – follow strict codes of ethics etc. and release their dogs on a limited register are advocating for spaying AFTER 12 – 18months once the dog has reached sexual maturity. Dogs should be allowed to mature naturally, sterilisation should be at the discretion of the owner, NOT the state.

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

See above – none. Owner’s discretion.

Centralised Registration System

9. How will a centralised registration system benefit you?

This is probably something I'd support – more so for the welfare of the dog with regard to if a dog was lost/found outside of its area then this system may be easier to reunite them- however as a member of Dogs West I'm not sure this would directly benefit me and my dogs personally.

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

Yes

This would be a more sensible approach than mandatory sterilisation. However consideration should be given to members of recognised dog associations. For example Victoria has reduced dog registration fees for members of Dogs Victoria.

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

No – this is a State Government initiative and as such should be funded by the Government. It is putting another level of complexity into the ownership of dogs. Why should law-abiding dog owners subsidise this? The current dog act is rarely enacted, this proposal is creating more laws that in all likelihood won't be able to be policed.

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?

Yes for breeders that are not part of a recognised dog association such as Dogs West. Dogs West has a code of ethics and regulations that its members must adhere to. They also importantly enforce compliance to these regulations and code of ethics by actively pursuing and prosecuting breaches.

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

I don't think this question is clear.

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

Yes. Obviously convictions of cruelty should be one restriction. Additionally, breeders should be required to complete an exam or similar detailing their understanding on breeding and why they breed. I think a minimum lot size should be required – not necessarily 'kennel zone'. I'd like to see ANKC expand or alternate associations developed such as 'Working Dog Kennel Club' and/or 'Performance Dogs Kennel Club' which have similar ethics as Dogs West, provide the same basis and assess the dogs/breeders for competence. These associations should approve/deny breeders under state legislation and other specific code of ethics/rules. The state should develop these associations in conjunction with Dogs West to allow 'breeders' to be monitored.

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

No. Should be done by a central body such as the Department of Primary Industries and Regional Development

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 I think there needs to steps taken to ensure standards are met in order to oust puppy farms, however in this case no information has been provided as to what standards are proposed. It is hard to completely support it, without an outline particularly given the unrealistic conditions attempted to be imposed in NSW and VIC. ANKC registered Breeders and national ANKC clubs need to be consulted to ensure these standards are achievable and provide the best for the animals welfare. Unsure

No

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

Personally I believe an exam – or mission statement or similar needs to enforced. Why does someone want to breed? To make money – WRONG, approval denied. To ‘better the breed’? To provide high drive working and performance dogs for the purpose of sport and farming/agriculture – then sure. Restrictions should include those that don’t have a basic understanding of the breed/breeds proposed to be bred and a financial review should be conducted – can they even afford to breed? To get all the genetic tests, and necessary pregnancy/delivery vet visits completed.

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

Yes Yes, based on the fact a human can technically 16 (average) children during their reproductive life – and given our birth rates aren’t this high medical intervention to provide a max number of litters is a great idea. Including mental/behavioural consideration of the bitch and the size of the dog.

Unsure

No

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

I don't think breeding should be done as a commercial industry. Breeders may profit, but it shouldn't be a business model. This needs more discussion.

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 is a complex question and the answer should not be based on numbers alone. How is a "breeding" dog defined? For example many breeders keep older dogs – are these going to be counted as "breeding dogs"? How is the quality of an establishment to be measured. Again these standards are being drafted with no input from any organisation that has breeding experience. I don't think breeding should be commercial venture full stop.

* 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:



Date: 23/07/2018

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