



# 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](mailto: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 type="checkbox"/> Other <input checked="" type="checkbox"/> Enter title here. <b>Dr</b>
First name:	Joanne
Surname:	Sillince
Street or postal address:	[REDACTED]
Telephone (business):	[REDACTED]
Mobile telephone:	[REDACTED]
Email address:	[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

**Pet industry representative body**

## Transitioning Pet Shops to Adoption Centres

---

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

Experience in Vic after the passage of their disastrous legislation indicates that this is a moot point. Shelters and pounds are effectively handed a monopoly on retail dog supply and they refuse to supply to pet shops. Shelters and pounds make windfall profits. Dog purchase moves online and interstate from breeders that can't be assessed. It's actually better for animal welfare to turn pet shops into the preferred retail pet supplier, where breeders can be monitored and pet shops can be licensed.

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

Regretfully, because of the national dog shortage, a high % of dogs left in shelters and pounds are behaviourally unsuitable for adoption, particularly by young of inexperienced families (RSPCA 2016). Generally there is no good background information on rescue dogs. Many are too large or have a chequered history, as was proven by the dog that killed the shelter work in WA in 2017

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

NO. data indicates that dog purchase moves to the internet or interstate with no regulation, inspection or registration. Experience since the Vic legislation results in reports of selling in Bunnings carparks, Macdonalds carparks and shipping 8wk old pups from unlicensed breeders interstate. Data shows that where pet shops have been "transitioned" to adoption centres, shelters and pounds refuse to supply because they can make windfall profits by selling from their own premises (NB RSPCA retail outlets). Data shows that the costs of dogs is rising exponentially to the detriment of both animal welfare and the Labor party's constituency.

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

Data proves that Vic where this legislation was introduced, pet shops have closed. Retail chain pet shops reap the benefits in the short term, but all retail chains are now reporting difficult trading as the national dog shortage is really biting.

## Mandatory dog de-sexing for non-breeding dogs

---

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

Data proves consistently that Australians don't culturally respond to "mandatory" in the same way they don't respond to "bans". Bitches should not be desexed prior to 20 weeks of age due to the risk of incontinence. People who choose not to obey laws simply do not desex. "backyard breeding" continues. The policy cannot be enforced and prosecutions are expensive and non-existent. Are you seriously going to have inspectors feeling empty scrotal sacs for dogs and opening bitches vulvas? BUT culturally there may be no need. Data shows that 90%+ of pet owners have their pets desexed (Hendry, 2009).

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?

Bitches with a high risk of incontinence, Guide dogs, Assistance dog breeders, working dogs, dogs whom a breeder wishes to "carry on" for possible breeding purposes. NOTE that "registered breeder" is a joke in WA. Only Dogs WA is recognised, so there is no option for hybrid breeders to "register". The government needs to recognise at least 5 breeding organisations to avoid monopoly behaviour (seen in NSW) before implementing "only registered breeder" action. Purebred breeding organisations are NOT standards organisations.

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

Data shows that mandatory desexing laws do not work. Positive cultural reinforcement works.

## Centralised Registration System

---

9. How will a centralised registration system benefit you?

Depends on the design of the system. In NSW, used primarily for prosecution. In other organisations can be used to determine quality breeders. Centralised registers are generally inaccurate, costly, and not audited. We are open to discussion on quality register design.

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

Yes **YES**

Unsure

No

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

Depends on the cost. Data from Vic proves conclusively that registration fees that are too high simply results in non-registration – having the reverse effect to that intended. Better to have a really strong and self funding enforcement system (funded from the proceeds of prosecution). Strong enforcement and prosecution have a strong deterrent effect (NB Consumer legiation)

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?

Data proves conclusively that annual registration fees result in high rates of non-compliance, particularly in the rental community but generally as well. Thus those that choose to obey the law carry the burden, as do pensioners, and those with disabilities – exactly the same people that we want to own pets due to the positive social and health benefits!

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

Breeder organisations are NOT standards organisations. Note that for quality breeders who keep breeding stock until death, registration fees can be prohibitive compared with euthanasia or surrender. Happy to submit a fully worked breeder registration system.

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

Yes, any person subject to court imposed restrictions on pet ownership or pet breeding in ANY state, any breeder who cannot meet properly constructed conditions of an objectives based Code of Practice. NOTE THAT NUMBERS OF DOGS OR STAFF RATIOS SHOULD NOT BE RESTRICTIONS AS THIS PRODUCES SIGNIFICANT UNINTENDED CONSEQUENCES.

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

Ideally should be national, as pets move between states. Should be enacted under COAG under the same national animal welfare scheme that governs pigs, chickens, and livestock. If cannot be national, at least state level.

## 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 **YES**

Unsure

No

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

Yes, any person subject to court imposed restrictions on pet ownership or pet breeding in ANY state, any breeder who cannot meet properly constructed conditions of an objectives based Code of Practice. NOTE THAT NUMBERS OF DOGS OR STAFF RATIOS SHOULD NOT BE RESTRICTIONS AS THIS PRODUCES SIGNIFICANT UNINTENDED CONSEQUENCES.

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

Yes

Unsure

No **NO** Not only is there no data to support this, the data suggest that this may be damaging. Pyometra is more common in non-bred bitches. Happy to provide papers.

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

NO the standards should be the same for all breeders. Either we are after quality breeding, or we are not. Either we are for animal welfare or we are not.

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:

Data demonstrates conclusively that larger breeders have higher standards on average, since they are visible and are easily inspected. They also have more to lose from prosecution. Smaller breeders can have appalling standards and will never be detected. Data also shows that staff ratios are ridiculous, as backyard breeders are often not present at all for significant parts of any 24 hour period. Staff ratios should change according to time of year, workload, infrastructure of the facility, automation, etc. Criteria should be the same for all breeders and must be objectives and standards based. NOTE that ALL breeding can be classified as "for financial gain". Purebred breeders sell breeding stock, charge stud fees and sell pups as "not show quality". Working dog breeders sell working stock to other farmers, often for huge sums (eg \$20,000).

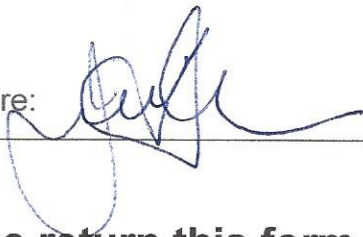
\* Attach further documentation if required.

## 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: \_\_\_\_\_

03 08 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](mailto:puppyfarming@dlgsc.wa.gov.au)