

Stop Puppy Farming Questions

1.

Please indicate if you

are any of the following:

- Dog Owner x
- Dog Breeder X
- 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 X

Member of Canine Association of WA (DogsWest) since 1995. Licenced judge for groups 3, 5, 6, and 7.

Transitioning Pet Shops to Adoption Centres

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

No. I enjoy large breeds of pure bred dogs. I would certainly NOT buy or acquire such a dog from a pet shop or from a rescue organisation because there is no means of knowing definitively the actual background of the dog, and what traumas or bad experiences it has been subjected to before being 'rescued'. As I have 5 grandkids under 12, I would want to be 100% certain that no harm would come to them while interacting with a large dog – and a rescue dog cannot be ever fully trusted to cope with every situation in a normal family situation.

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

Proof of provenance since birth, including all changes in ownership, with no 'time gaps'

Behavioural assessment, and a unambiguous 'approval' by a qualified animal behaviouralist that the dog is stable in temperament, has fully passed all aspects of the behavioural assessment, and has been approved by such person to be suitable for rehoming, and a clear statement as to the type of home situation the dog must be placed in.

DNA profile to ensure that large dogs often passed off as 'bullmastiff/mastiff/great dane/staffie cross' is not in fact, a pitbull or pitbull cross – which is known as a dangerous breed. (in my experience owners of pitbulls and pitbull crosses are commonly registering their dogs as bullmastiff crosses, to circumvent the dangerous dog requirements).

Full medical history and check on rescue

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

Clarification needed: 'beneficial for whom?' - the rescue organization which may have sold the dog to a pet shop? (definitely beneficial as they can cover their costs plus and make room for more rescues) or the pet shop? (definitely as they are a straight commercial enterprise and will want to sell dogs which are readily 'saleable') the rescued dog? (may be but also high risk that it is not beneficial for the dog as shoppers in pet shops are likely to impulse buy a dog and this type of purchase is reknown for high dumpage rates (eg Christmas presents with little thought of the long term consequences and associated responsibility of caring for a dog throughout its life)

In my view, as a registered breeder with the ANKC, this suggestion is ridiculous and I am completely against this suggestion. This suggestion by the Government is dangerous and will lead to rescue dogs being dumped again and again as petshop are not a suitable place to sell dogs, and in particular those which have previously been traumatised, abused or neglected or removed from their loving home (eg if an elderly owner dies, or families relocate overseas, etc). These dogs will be anxious and highly stressed. Shoppers will impulse buy and likely regret their purchase.

I consider this suggestion to potentially be very dangerous as such a 'damaged' dog may turn on its new owners and / or their children or other vulnerable people and attack them with possible life-threatening outcomes. It is known that a dog's behaviour will change once it has got over the original settling in period in its new home, and it is at this time that the dog will be most unpredictable – ie will it stay submissive at the 'bottom of the family pack'? or will it start to display dominance particularly to 'lesser humans' like children??

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

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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 opposed to mandating desexing of dogs, whether breeding stock or not. Having had long discussions with my specialist reproduction Vet, Dr S Metcalfe, it is evident and widely known that desexing is generally NOT good for a dog's health and wellbeing – and the RSPCA's and the puppy farming project's public statements that desexing is good for a dog's health and wellbeing is just an uneducated and naive 'gut feeling' which is not supported by science or on any other basis.

I stand to be corrected so I would be very keen to hear the detailed justification and scientific reasoning behind the RSPCA's and the puppy farming project's views about the health and welfare benefits of desexing dogs and bitches.

Yes clearly, if a bitch is viewed by its owner as a uterus and the poor bitch is constantly made to have litter after litter, then desexing may be beneficial to her – although any owner who views their bitch as a uterus to pump out pups, is far more likely to dump her, kill her or starve and neglect her – so which is the least worst outcome for her?

Mandatory desexing is a very blunt and inappropriate instrument to stop commercial and indiscriminate breeding and production of puppies. There is no evidence that mandatory desexing will 'reach' and stop the cruel puppy farming activities of (those relatively few) horrible people who don't love their dogs and just see their dogs as money making machines.

Again, I stand to be corrected, so I would be very keen to be provided with clear, scientific and researched evidence that mandatory desexing of dogs will 'stop puppy farms' or will result in a dramatic reduction in dogs requiring to be rescued.

I consider that desexing a dog or bitch is a decision for each owner in discussion with their vet. I only desex my dogs on medical grounds, and over my 20+ years of owning dogs, I have only desexed a very few.

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?

I reiterate my complete and total opposition to mandating desexing of dogs – except for declared dangerous dogs.

As the scientific evidence is that desexing dogs is not good for their health and welfare, this question is redundant and invalid.

As the scientific evidence is that desexing is not generally in the best interests of any dog, mandating desexing will lead to more unhealthy dogs with reduced lifespan, ongoing chronic conditions, expensive surgery to fix joint and ligament damage and failure, with ongoing chronic degeneration of joints, behavioural problems, etc.

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

This suggestion is totally unacceptable. There is no precedent for retrospective legislation in WA, and I repeat my total opposition to mandatory desexing of dogs.

The skewed nature of the question is unacceptable and demonstrates a poor and cynical approach by the State Government agencies involved to 'consultation'.

Centralised Registration System

9. How will a centralised registration system benefit you?

A centralised registration system will not benefit me: The fact that all puppies bred by ANKC registered Breeders are required to be microchipped BEFORE they leave the breeder's home, is the effective means of owners always being able to locate their pure bred dogs. As around 82% of dogs are already microchipped, then this method of locating dogs is working for 4 out of 5 dogs – the focus should be on getting all dogs microchipped through education and providing incentives.

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 - this is already the case: it costs much more to register / re-register a dog / bitch which is not desexed. The workload for the local authority is the same to register/re-register a dog whether it is desexed or not, so there is no justification for further increasing dog rego fees.

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

No, I am strongly opposed to this proposal. Enforcement activities should be funded from within the enforcing agency's budget.

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?

No. Draft Standards have not been provided and will not be until after the close of the 'consultation' period, so it is impossible to provide any useful advice or input. My view is just to leave things as they currently stand, that is leave it to animal welfare groups/RSPCA/Local authority/police etc to visit premises if they are contacted by concerned neighbours/visitors to the house etc.

That is treat dogs in exactly the same manner as humans where kids, women, elderly residents at risk and suspected victims of abuse, neglect, maltreatment, etc are generally made known to the relevant authorities via concerned family, visitors, neighbours, and then relevant authorities are duty bound to follow up and investigate and take any enforcement action if appropriate.

I think it is naïve, over the top, and an invasion of people's privacy to think that a local authority/RSPCA/other agency will patrol registered breeders' premises to check on their dog - breeding activities. Where is the demonstrated evidence that people who breed dogs are as a whole such bad characters that a high level of proactive monitoring and enforcement will be required?

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

I am already a registered breeder with the ANKC via DogsWest. The central register approach proposed I feel will generate far more issues than it will solve. It is a very bureaucratic way of trying to 'stop puppy farming'. People who want to do the wrong thing will just keep on operating outside the law, so the more bureaucratic the approach taken, the more likely it is that people will avoid getting tangled up in the Government's registration proposals.

As a Registered Breeder with the ANKC I am required to meet the highest standards of ethical breeding and the highest standards for raising pups and the highest standards in after sale service to new owners – and if I don't then I can be severely fined by DogsWest and / or expelled from DogsWest such that my pups can no longer be sold with pedigrees recognised around the world.

Is it proposed that people who are not willing to join DogsWest to pursue their hobby of breeding pure bred dogs can instead be registered by the government, with all that entails in terms of puppy purchasers expectations that such persons and their breeding practices have been 'approved' ie 'endorsed' by Government??? What standards of ethical breeding/raising pups/after sales service etc will be required of these Government – approved breeders and will these standards be at least as tough as the ANKC standards??

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

People who have been convicted of animal cruelty offences should not be able to be registered as breeders (this is automatically the case with DogsWest members – their membership is cancelled).

People who have a history of their dogs causing a nuisance to neighbours and the community (roaming at large, noise nuisance etc) should also not be able to be registered as breeders

All DogsWest Members must automatically be exempt from the requirement of also being registered with the Local Authority – this is double dipping and DogsWest members already meet the highest standards of animal welfare and ethical breeding.

People who have been convicted under the Dog Act of any offences within the last five years should not be able to be registered as a breeder (ie these offences will most likely relate to dogs of breeding age).

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

This question is highly confusing. I am a registered breeder with the ANKC, via the CAWA. I am strongly opposed to the suggestion that I should also be registered by my local authority, or to be registered by my local authority instead of being registered with ANKC???

Local Government is not willing nor capable of enforcing dog breeder registration – it is best placed to address concerns in relation to the Dog Act, Planning Act, etc when concerns are directed to it from owners, the community, visitors to premises, etc ie in a reactive/responding way, but is not resourced nor inclined to proactively ‘go looking for possible problems’

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 No, all breeders, in exactly the same way as ANKC registered breeders, must be required to comply with high standards, not minimum standards for the health, welfare, sale and after sales service of their dogs

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

This question is a repeat of Q14 above.

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

Yes

Unsure

No in my view legal restrictions should apply to the number of litters that a bitch can produce **only if** a minimum mandated legal breeding age, and a maximum breeding age, together with a minimum time period between litters are also specified in legislation/Regulations. These are all important factors in protecting the health and welfare of the breeding bitch: no one factor is more important than the others, in my view.

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:

For persons keeping 10 or more breeding dogs on a commercial basis, I consider that the business should also be made to employ on a full time basis, one vet nurse per 5 dogs, in order to adequately exercise each dog each day; ensure a good level of grooming appropriate for the breed/nature of the coat; ensure a high level of care, socialisation and enrichment for each dog; ensure a high level of cleanliness and sanitation and kennel management; and to ensure a high level of management for the raising of puppies and management of the nursing bitches.

Persons who breed for commercial reasons should be banned from transporting puppies raised elsewhere into their breeding establishment.

Persons / businesses who breed for commercial reasons must be required to rehome their dogs in suitable homes at the end of their breeding usefulness. Appropriate Regulations will need to be put in place, in a similar manner as for rehoming ex-racing greyhounds, so that these dogs are not disposed of, but all are found suitable homes, and the commercial breeding establishment must be required to undertake periodic checks that their former dogs are being kept in good conditions and have not been resold, or in any way become untraceable.

* 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 X

Signature: Roni Oma

Date: 20 July 2018

Please return this form to:

Please return submissions by 4pm on Friday 3 August 2018

Post

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