

# STOP PUPPY FARMING

## Public Submission Form

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

# Stop Puppy Farming Questions

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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

Dog Owner 25 Years

## Transitioning Pet Shops to Adoption Centres

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

No, I purchase pedigree dogs from reputable breeders

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

N/A

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

No, pet shops are commercial businesses tasked with making a profit. They sell product and to achieve this is through reducing staff costs and increasing turnover. There is no benefit in making them adoption centre, they should not sell 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

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

Mandatory de-sexing is an unproven method for stopping puppy farming or unwanted breeding and is unlikely to have the desired effect.

It may have some reduction in reducing re-surrender rates for re-homed or adopted dogs, but will result in unnecessary harm and cruelty to many thousands of dogs. It is an unnecessary imposition on dog owners and should be strongly opposed.

The first issue that should be addressed is how a procedure recognised as resulting in significant adverse health outcomes in dogs will stop puppy farmers. This idea is borne of an old dogma that all dogs need to be sterilised and is simply cruel and unnecessary for some dogs and breeds. It will only result in unnecessary suffering in our pets (and significant unnecessary owner expense) will not achieve the desired effect of reducing puppy farming.

There is no evidence for this belief and it will certainly not stop backyard breeders, if that is their business.

#### **Adverse Health Effects on Dogs**

There is increasing evidence that early neutering is associated with multiple adverse effects in a number of breeds. More specifically it has been shown that early neutering of dogs results in:

- 2 – 9 times the risk of cranial cruciate rupture in some breeds.
- 2 fold increase in bone cancers
- 3 – 4 times the risk of soft tissue cancer
- Twice the risk of hip dysplasia
- Increase problems with incontinence in females ~20% (Arnold 1997)
- Hemangiosarcoma, a highly malignant form of cancer, osteosarcoma (bone cancer), and transitional cell carcinoma (bladder cancer), both sexes
- Prostatic cancer in male dogs
- Autoimmune thyroiditis and hypothyroidism, both sexes
- Urinary incontinence and urinary tract infections in females
- Obesity, both sexes
- Endocrine dysfunction, adrenal disease
- Cognitive impairment in old age (Hart 2001)
- Behavioural problems (Kaufmann CA 2017)

There are some studies that suggest that there is early neutering leads to longer life for dogs, but this research does not control well for bias of the vet care and owner's socioeconomic status. The differences in lifespan can be well explained by these confounding factors of healthcare and nutrition.

It is well documented that problems such as cruciate rupture or hip dysplasia results in prolonged lameness, arthritis and pain and requests for early euthanasia.

Other behavioural issues with sterilisation including female domination behaviours and incontinence can be quite distressing for the owners.

I will detail some well-known and well documented issues:

### **Cranial Cruciate Rupture, Lameness and Early Destruction**

It has been long and widely known that early spayed and neutered dogs have significantly higher risks of cranial cruciate rupture (CCL) (Slauterbeck 2004; Whitehair, Vasseur, and Willits 1993).

Neutering in the first year is associated with other debilitating joint disorders, namely, hip dysplasia (HD) and elbow dysplasia (ED).

In a study of 1170 German Shepherd Dogs, the effect of neutering prior to one year tripled the risk of one or more joint disorder (Hart et al. 2016). In intact males, the incidence was 7%, in neutered dogs (before the first year) the incidence was 21%.

For cranial cruciate ligament rupture, CCL occurred in less than 1% in intact males, but for the <6 months and 6–11 months neuter periods, this joint disorder occurred in 12.5% and 8.3% of dogs, respectively, significantly higher than that of intact males. The median age for CCL rupture in the neutered dogs was 4-6 years, likely resulting in significant long term loss of mobility, arthritis, need for unnecessary surgery and early euthanizing prior to expected lifespan.

Similar rates of CCL rupture have been seen in Labradors and Golden Retrievers (Torres de la Riva et al. 2013). In this study of 759 Golden Retrievers (a very popular companion dog), 10 percent were diagnosed of the early neutered dogs developed hip dysplasia, double the occurrence in intact males. There were no cases of cranial cruciate rupture in intact males or females, but in early-neutered males and females the occurrences were 5 percent and 8 percent, respectively. Similar issues are seen in Labradors (Hart et al. 2014).

In countries such as the United States, where early de-sexing has become popular the rates for surgery for cranial cruciate ligament repair has sky rocketed. In 2003 it was estimated owners were spending \$1.3 billion per year on this surgery for their dogs and it likely to be significantly greater 15 years later. (Wilke et al. 2005). It is less common procedure in Europe where 60-99% of dogs are intact.

The association between early neutering and the development of cranial cruciate tears in dogs is widely recognised with the doubling of risk across all neutered dogs it as proposed as a model for studying cruciate ligament tears in post-menopausal women (Slauterbeck 2004).

If there are an estimated to be ½ million dogs in Western Australia, and if there is an estimated prevalence across all breeds of 5% of CCL rupture in neutered females ~4% in neutered males and half the prevalence in intact animals, then mandating early sterilisation could result in another 12,500 CCL repair operations and many requiring early euthanizing (of the family pet). It would be probably much higher for the some breeds. I am sure the veterinary surgeons would be pleased about the extra income, but this could be reduced by allowing the pet owner to decide on when and if sterilization is appropriate depending on the breed, the purpose of the dog and other risks.

### **Increased Risk of Cancers**

It is recognised that spaying dogs can reduce the risk of some hormonally driven cancers such as mammary cancer. However, the risk of this tumour in some breeds is low and this may be more relevant for other breeds for example, Golden Retrievers.

Cancer in dogs is a common problem and there is other evidence that de-sexing significantly increases the risk of many cancers. There is evidence however that pursuing the intervention of spaying a dog, in reality, does not affect the significantly impact of the hormonally driven cancers such as mammary cancer or other conditions such as pyometra on the life span of the dogs (Waters et al. 2017).

In a study of 2500 vizsla dogs, it was found dogs neutered or spayed at any age were at **significantly increased risk for developing mast cell cancer, lymphoma, all other cancers, all cancers combined** compared with intact dogs (Zink et al. 2014).

The younger the age at neutering, the earlier the age at diagnosis with mast cell cancer, cancers other than mast cell, hemangiosarcoma, lymphoma, and all cancers combined.

Compared to intact dogs, neutered and spayed dogs had a **3.5 times higher risk of developing mast cell cancer**, regardless of what age they were neutered.

*I have had to put one of my dogs down due to this cancer, it is truly a horrible condition and the dog was only six years old. It had been neutered by its previous owner at a young age.*

**Spayed females had nine times higher incidence of hemangiosarcoma** compared to intact females, regardless of when spaying was performed, however, no difference in incidence of this type of cancer was found for neutered vs. intact males.

Neutered and spayed dogs had 4.3 times higher incidence of lymphoma (lymphosarcoma), regardless of age at time of neutering.

This has been seen in other breeds especially prone to cancers, in that early neutering results in substantial increases in the rates of cancer (Hart et al. 2014). Golden retrievers seem to be particular sensitive to gonad removal with increase risks of cancer as a result.

In a more recent review of 90,900 dogs over a 15 year period, it was found that neutering was significantly associated with an increased risk for males and females for cancers (hemangiosarcoma, lymphoma, mast cell tumour, and osteosarcoma) (Belanger et al. 2017).

This study also showed ruptured anterior cruciate ligament and epilepsy were significantly associated with neutering and intervertebral disk disease was associated with increased risk in neutered female dogs.

For both male and female dogs, if they are neutered before 1 year of age, the risk of osteosarcoma, or bone cancer, is significantly increased. Since it is estimated that osteosarcoma already kills around 20% of Irish Wolfhounds, imposing this mandated action on this breed will be a distressing outcome for these owners and cruel to their companions. Cancer rates in Irish Wolfhounds are: osteosarcoma at 20%, lymphoma at 4.7% and hemangiosarcoma at 2.3%, surely the owners are best placed as to when and if they wish to neuter their dog.

It would seem with increasing numbers of dogs being studied, the picture has become clear that neutering dogs will have an increased of cancer. It is especially significant in some breeds and will be extremely distressing for the owner and manifestly cruel for the dog. These are companion animals and it is up to the owners to make decisions about the health care of the dogs, not the Government.

### **Autoimmune Disorders**

A further review of 90,090 dogs over 15 years found significantly increased rates of autoimmune disease including:

- atopic dermatitis,
- canine myasthenia gravis, colitis,
- hypothyroidism,
- hypoadrenocorticism,
- immune-mediated polyarthritis,
- immune-mediated thrombocytopenia,,
- inflammatory bowel disease, and,
- pemphigus complex

for neutered females, and neutered males (Sundburg et al. 2016). These rates were doubled in a number of the conditions and for conditions such as atopy this can be prevalent at 2%. All these conditions are distressing to the dog require chronic and expensive vet care.

This research reflects what other authors have reported in the literature and it would appear that removal of the sex hormones has other significant effects on the canine immune systems.

### **Behavioural Issues**

Whilst it is recognised that de-sexing may reduce some behaviours, studies have shown worrying behaviours associated with neutering.

In a Masters Thesis, Farhoody and Zink (2010) found in a large sample of dogs significant correlations between neutering dogs and increases in aggression, fear and anxiety, and excitability, regardless of the age at which the dog was neutered.

Other studies have noted worrying behavioural issues, but to support the dogma that neutering dogs will solve behavioural issues in dogs is without evidence (Kaufmann CA 2017).

Some authors refer to studies where behaviour improves with this procedure, but on reviewing the actual research, one finds it has been conducted on small numbers of dogs, is questionable in the methodology and likely biased. Such research is a very weak basis to call for the carte blanche interference with all dogs and onerous burden of unwanted health effects on all dog owners,

The behaviour and control of a dog should be placed squarely into the responsibility of the owner.

### **Change in Breeder Behaviour**

If sterilisation becomes mandatory, it will be seen as a necessary part of breeding a dog and many breeders will then begin to have to have the dog sterilised before the sale to prevent complaint against them. This has happened in other States and the younger the pup the more likely the complications especially incontinence, with rates of 20% in early spayed females.

Unfortunately there are a few vets in Australia that are sufficiently trained to undertake this procedure in very young puppies which will increase the complication rate and it is clear that dogs coming from other States where there is early neutering are arriving here and developing growth and joint problems.

### **Unnecessary Veterinary Costs**

The Government imposing mandatory de-sexing removes an owner's agency over the health care decisions for the dog.

Such decisions should be made on the basis of the type of dog, its purpose, the potential risk and benefits of any intervention.

As a consequence of this intervention, there is substantial evidence that many dogs will have significant and debilitating complications from this procedure. This includes the need for cruciate ligament repair, hip surgery and cancer treatment. The cost of such treatment can be in the region of many thousands of dollars. They may require long term medication for incontinence in up to 20% of dogs as well as having the requirement for expensive auto-immune suppressant medication.

I doubt that if the government mandating such a requirement will indemnify the owners against these known complications. It should be liable, as given the evidence, it will be more probable than not that these outcomes will be attributable to the intervention in a number of breeds.



There are multiple other reasons why such a measure should not be mandated, however in short to imposing and unnecessarily mandating such treatment on hundreds of thousands of dogs, will result in thousands of dogs going lame, with the need for hundreds of operations and the unnecessary destruction of young dogs all to prevent a few hundred dogs becoming homeless or unwanted. This is cruel and unwise. It will result in owners being financially disadvantaged, children being traumatised when they have to see their loved family pet put down or seeing them in pain.

This action is manifestly cruel and given the information at hand the government is considering instigating a set of decisions which will make it far more of a villain than the puppy farmers that should be controlled by education of the public and better regulation of breeding.

*The only person that should be making a decision about a dogs health care is the owner in conjunction with review of the breed specific research, consultation with appropriate organisations and if need the dog's veterinarian, unless there is a significant public health issue.*

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Whitehair, J.G., P.B. Vasseur, and N.H. Willits. 1993. Epidemiology of cranial cruciate ligament rupture in dogs. *J Am Vet Med Assoc* 203: 1016-9.

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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?

The decision to de-sex a dog should be undertaken by the owner on appropriate advice from the breeder or other credible sources including the association for the Pedigree, International Associations and Clubs for the breed and as well as veterinarians that may be familiar the breed. The owner can take into account the known and available research on the benefits and risks for that breed. For example, research is still underway in the Golden Retriever Lifetime study; it is known that de-sexing can significantly increase the risk of cancers in this group, but the research may give an optimal timing for this intervention. This then will be up to the owner.

This is not a decision for government and if it was it should become responsible for the complications of such interventions.

There are a number of breeds that do not mature for a sometimes two years and thus there should be exemptions for:

- Sporting breeds, retrievers, vizslas, pointers,
- Club dogs – sledding dogs, hunting dogs, working dogs, shepherds
- Breeds prone to joint disorders and cancers,
- Very large dogs such as wolfhounds.

The need for de-sexing should be made by the responsible owner on the basis of appropriate information that has been made available.

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

Mandatory de-sexing should not be applied to any dogs. It is a mis-belief that such a step will prevent large numbers of unwanted puppies. Additionally, I have a very old male dog, he only goes on short walks the likelihood that he would be able to breed is zero. Imposing de-sexing on him would be inhumane and cruel.

## Centralised Registration System

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9. How will a centralised registration system benefit you?

No it will be of no benefit

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

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

No

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

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

NA

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

NA

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

Yes, they know the local areas problems and needs.

## Mandatory Standards for Dog Breeding, Housing, Husbandry, Transport and Sale

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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?

Yes, they should be deemed responsible individuals

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?

NA

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:

[Click here to enter text.]

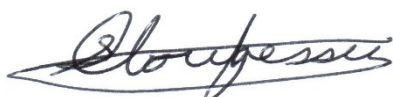
\* Attach further documentation if required.

## 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: 2 August 2018

## Please return this form to:

**Please return submissions by 4pm on Friday 3 August 2018**

### Post

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