

# 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 type="checkbox"/> Ms <input checked="" type="checkbox"/> Other <input type="checkbox"/> Enter title here.
First name:	██████████
Surname:	██████████
██████████ postal address:	██
Telephone (business):	Enter number.
Mobile telephone:	██████████
Email 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

**Passionate advocate trying to bestow upon the public the reasons and benefits of purchasing a puppy through an ANKC Registered (& reputable) Breeder.**

## 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. Retail premises are ill-equipped to assess suitable pet owners. They are essentially a small business who are in it solely to be profitable, I doubt they have the integrity to refuse a sale if the potential purchaser is not a suitable match for the dog. More often than not, rescue dogs can come with their own issues which require more skills to deal with than the average dog owner has. Furthermore, live animals SHOULD NOT be made available for sale from the confinement and overwhelming environment within a shop front. Such an environment is likely to stress an animal making it very difficult to assess its true character and thus find a suitable home. Animals are not a typical retail commodity and should not be treated as such.

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

Currently, rescue organisations are unregulated, but most seem to do a good job in finding the best possible homes for their dogs. They go through an extensive selection and inspection process. At best, pet shops should only be a referral point for pet buyers and have a current list of available rescue dogs that are available for adoption via the respective rescue organisations. It should then be up to the purchaser to approach the rescue organisation who has the dog up for adoption, and then be assessed as a suitable owner for that particular dog. The rescue organisation would have an obligation to fully disclose the profile of the dog.

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

Most definitely NOT.

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

[Click here to enter text.]

## **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?

Completely opposed to the idea. There is mounting evidence to suggest that early (less than 12 months of age) desexing is detrimental to the growth, development and in turn, long term health of dogs, especially in large breeds. This proposal will only serve to inconvenience and infuriate the responsible dog owning population of entire (undesexed) dogs. It will do NOTHING to curb the unwanted dog population in places such as the low-socio economic areas of Broome and the surrounding communities who have a general disregard or lack care for the law. The local government agency does not have the capacity to enforce the current dog laws, let alone the onerous ones that this proposal is suggesting. I already pay a hugely inflated council registration for my two undesexed (non-breeding) dogs – of course for the perceived 'risk' of those entire dogs siring unplanned litters. A little difficult from the confines of a well secured yard, and for obedient dogs who are never out of sight of their owners. My decision to keep my dogs entire is based wholly on health reasons, and the fact that I know I can contain AND control my dogs in public. They will never sire any litters with or without my consent.

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! Those owners of undesexed dogs who can prove their credibility as a responsible pet owner. I don't even believe that all "registered breeders" should be exempted, as per the Proposal. To be clear in that comment, I see there will be two defined categories of "Registered Breeder" as a result of the Proposal. There will be those who are Registered Breeders of pure-bred dogs (by that I mean ANKC recognised breeds) – these people will already be registered with the respective state branch of the ANKC, or Dogswest here in WA. As a member of that organisation they are already bound by a strict code of conduct and will have a strict set of moral ethics. These people should definitely be exempted. The second type of "Registered Breeder" will be the new brand of breeders created by this Proposal of cross bred dogs or un-papered ANKC breeds who choose not to breed ethically in line with ANKC guidelines. Automatic exemption should NOT apply! As it currently reads, I can apply to become a "Registered Breeder" (even though I have no intention of breeding) so as to avoid having to desex my dogs? Which I am happy to do (and pay for) but this is the sort of loophole this legislation creates. This new proposed class of "Registered Breeder" will do nothing to stamp out the poor breeding practices of those people who both historically and currently pose a serious problem to the dog-owning community and which I thought these laws were actually supposed to be aimed at. I will point out a case for you – there is a breeder of Golden Retrievers and Flat Coat Retrievers in Southern River. She was previously an ANKC Registered Breeder under the kennel name of [REDACTED]. Her poor breeding practices and numerous complaints of unhealthy and sick puppies through Dept of Consumer & Employment & Protection led to a push by consumers to Dogswest for her to resign, and she did so in 2014. She still continues to this day to sell 'purebred' puppies, still with the same volumes of health problems to unsuspecting buyers. Buyers which these new laws should actually be protecting. Statistics for a 14 month period from 16/06/2012 – 15/08/2013 showed that this breeder bred a total of 163 puppies. I ask how these proposed laws will protect consumers and more importantly, the dogs in situations such as this? I cannot see an answer to this within the Proposal. If anything, this proposal will serve as an endorsement by the Government to allow the shonky practices to continue – legally!! The proposed introduction of this new brand of "Registered Breeder" the Proposal will also confuse (and I believe, mislead) consumers. As an advocate of responsible breeding within the ANKC umbrella, the most often asked question is "Where can I purchase a puppy?". The answer has always been "From a registered and reputable breeder". When there is going to be two different types of Registered Breeder, how are consumers going to be able to distinguish the vast differences between these two types of breeders? The proposed introduction of a new Registered Breeder status will, as I see it, only create a protective banner for the unscrupulous back yard breeders and puppy farms to continue to exist under.

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

I don't believe that mandatory desexing is a viable proposition at all.

## Centralised Registration System

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9. How will a centralised registration system benefit you?

I don't believe that it will. I will only purchase any further puppies from an ANKC Registered Breeder, and the history of that puppy will be carefully detailed by that breeder and documented in the official Registration Certificate that shows several generations of pedigree of that animal.

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. The already exorbitant LG Registration Fees that I pay for both my dogs shows how well that suggestion of increased revenue works in maintaining dog laws and controls locally – it doesn't at all. The dog problems in Broome are rife. Typically those responsible pet owners such as myself will be the ones who will be further disadvantaged financially by proposed new laws aimed at reigning in those irresponsible ones. The increased revenue should be sourced from the people who will need to be controlled under the new proposal, and that is this 'new brand' of Registered Breeders that is set to be created under this Proposal (see further suggestions at Q. 12 below).

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?

The answer to that comes down to the two definitions of Registered Breeder that I believe this Proposal will create, as previously identified. The already Registered ANKC Breeder pays significant membership/registration/application/administration fees. It is totally unreasonable to expect that these breeders be bound by or forced to pay another set of fees through Local Government avenues. Under the current process, these breeders report to Dogswest where paperwork is submitted, checked, and when found compliant - certificates issued. To that end, I strongly believe that the proposed new "Registered Breeders" (of cross bred, or un-papered ANKC recognised breeds) should be bound to abide by a similar set of controls/fees as the ANKC currently imposes (although this would obviously need to be enforced by Local Government). This would eliminate a great deal of the 'backyard' and unethical breeders who see breeding a dog as a quick way to 'make a buck' – the likes of the breeder formerly known as [REDACTED] immediately springs to mind, amongst others. Only those with genuine reason and care would be willing to abide by a stringent set of controls and fees and they would in turn (hopefully) ensure that their puppies only went to approved and suitable homes.

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

Heavy penalties should apply for those individuals who sell puppies and dogs who are not Registered Breeders. This of course opens up another can of worms, especially here in Broome, where the animals will be given away for free or dumped which will only serve to add to the unwanted dog population locally.

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

Yes. Those people of sound mind, without any record of prior warnings, fines, or convictions in regards to the keeping of any animal. I would suggest that Local Government follow the example of the ANKC who require that new Registered Breeder applicants complete a quite comprehensive written questionnaire to determine their knowledge and level of understanding. Should they pass this, then further examination (such as property inspection) can be undertaken. There must be some level of contribution sought from prospective Registered Breeders that goes beyond filling in a form with their details and paying a fee. This deters nobody and those unscrupulous people who are in it for the wrong reasons will not be put off.



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

No, not as it currently stands. The introduction of this legislation needs to have an adequately staffed, dedicated and specialised team to ensure a smooth transition and future enforcement. Local Government Rangers already understaffed and have a very broad range of duties and responsibilities to oversee. I don't believe that current staffing levels and knowledge will be adequate to successfully implement the sheer scope of this proposal.

## 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. The ANKC already has such a system. The proposed new type of "Registered Breeder" should have the same set of rules to be bound by and enforced by Local Government. This would include vetting the applicant, comprehensive veterinary checks on breeding stock BEFORE breeding, regular premises inspections, limitations on numbers of dogs able to be kept, how often a female shall be allowed to whelp and records kept on genetic health issues that develop from that Registered Breeder (particularly within the first 12 months of a dogs life) – with views to penalising (financially and/or by way of de-registration) those who continue to produce unsound puppies at abnormal rates of occurrence.

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?

How will “commercial gain” be determined? People who breed an excessive number of dogs for commercial gain are those that these laws SHOULD be serving to stamp out, or at least regulate and restrict. Regardless, ALL breeders should meet the same high level of dog breeding standards. Interestingly, some time ago I conducted an exercise to look at the costs associated in bringing a litter into the world – and made a comparison between the checks an ANKC Registered Breeder would be bound by, and what you would typically get from buying from a “backyard breeder”, as well as the respective prices that each type of breeder would charge for a puppy. I did the comparison to quell the myth that ANKC Registered Breeders ‘were just out to make money with the prices they charge for their puppies’. I found that few people understood what actually went into breeding a quality litter (before it even got to the mating stage), and this chart was aimed at educating the general public in process and costs. The results were surprising – and the exercise is documented in blue text below.

**SCENARIO: A backyard breeder (BYB) and an ANKC Registered & Reputable breeder each bring a litter of 7 puppies into the world. The BYB charges \$1,500 per puppy and the RRB charges \$2,400 per puppy.**

(note that requirements such as food, proper whelping facilities and the cost of the puppy pack & take home food have not been included and by no means is this list conclusive or serve as any benchmark or recommendation)

SALE OF PUPPIES*	BACKYARD BREEDER		REGISTERED & REPUTABLE ANKC BREEDER	
	INCOME	EXPENSES	INCOME	EXPENSES
	<b>\$10,500</b>		<b>\$16,800</b>	
<b>LESS:</b>				
Hip/Elbow scores		-		\$1,000
Heart Certificates		-		\$900
Eye Certificates		-		\$80
ICT tests		-		\$220
Stud Fee		-		\$2,000
Progesterone text		-		\$300
Ovulation test x 3		-		\$300
Mating Assistant		-		\$200
Vet chk/Ultrasound		\$150		\$300
Worming		\$175		\$175
Vax/Chip/Vet check		\$840		\$840
ANKC registration		-		\$338
<b>‘PROFIT’</b>		<b>\$9,335</b>		<b>\$10,147</b>

**\*the RRB provides you with a Tax Invoice and supplier ABN, what does the BYB give you? Does the BYB declare their earnings to the Tax Office?**

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:

The number of breeding dogs should be firstly determined by the size of the property – farms and kennel properties should NOT be exempt, if anything, they should be more closely scrutinised as these already have been 'havens' for puppy farming operations in the past. Refer not only to my prior example of the breeder formerly known as [REDACTED], but the prosecution in 2014 of [REDACTED], 43 years old who was found guilty of 3 animal cruelty charges in relation to the keeping of a dozen dogs in an underground bunker at her South Doodlakine property. (Link to the news article:

[REDACTED]  
Restrictions for ALL Registered Breeders should be in line with the ANKC regulations. The ANKC should be left to look after and police their own members, with those members having to provide proof of membership to the Local Government agency who will enforce those same rules onto the Registered Breeders under their jurisdiction.

\* 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:

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## **Please return this form to:**

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**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)