

# 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 checked="" type="checkbox"/> Mrs <input type="checkbox"/> Ms <input type="checkbox"/> Other <input type="checkbox"/> Enter title here.
First name:	██████
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# 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

Owner of sporting dogs for 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 would only purchase from a reputable breeder, dogs are a significant investment and I investigate the breeder and ensure excellent lineage, they are expensive and live for many years.

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

If I was purchasing a rescue dog, it would require a trial period.

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

No, pet shop staff do not have adequately trained staff to know all the issues associated with each breed. They are in the business of making a profit.

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 will not stop puppy farming and will result in significant adverse effects on our pets and companions animals and should be strongly opposed.

Evidence indicates that Government should have no place in the decision on the health care of our dogs and this step in some situations will be cruel and inhumane.

I have had sporting dogs for the past 25 years. They will run many kilometres with me, up and down hills and through the bush. They are also involved in tracking. I invest a lot of time and money in the upbringing of my dogs. I am a member of DogWest and Trackwest.

I object to the government mandating a procedure on my dogs that will significantly increase the dog going lame with hip dysplasia and cranial cruciate ligament tear. This will affect my ability to take them out running, my health and will likely result in the early destruction of the dog. I certainly would not de-sex a dog prior to twelve months old.

This proposal has come about from poorly researched dogma and it takes little research to establish that there is growing evidence that early neutering is detrimental to a dogs health and longevity (Spivak 2015).

I have never breed from my dogs but they are expensive pedigree dogs, why should the government force me to put their health and longevity at risk and in turn put my enjoyment of my companion and my health at risk.

I draw you to the attention of the well-researched by Mark Spivak summary of the issue:

*“recent academic research shows that orchidectomy and ovariectomy, the most common surgical methods of sterilization, are potentially deleterious to the long-term health of dogs, such that the health benefits (such as the reduction in pyometra) and behavioral benefits (reduction in roaming, marking, and dog-dog conflicts between neutered and intact male dogs, usually instigated by the neutered dogs) are markedly outweighed by the increased health risks”.*

This evidence is widely available but has been summarised by Dr. Christine Zink, DVM, PhD, DACVP, DACVSMR, the Director of Molecular and Comparative Pathobiology at the Johns Hopkins School of Medicine, and the American Veterinary Medical Association’s 2009 Outstanding Woman Veterinarian of the Year.

She has produced a summary of the reported issues that question the dogma that all dogs should be sterilised as detailed:

### Orthopaedic Issues:

- *Bitches spayed at 7 weeks had significantly delayed closure of growth plates as compared to those spayed at 7 months, and those spayed at 7 months had significantly delayed closure of growth plates as compared to those left intact.*
- *In a study of 1444 Golden Retrievers, bitches and dogs spayed or neutered at less than a year of age were significantly taller than those spayed or neutered after a year of age.*
- *In a study of 203 agility dogs, the author demonstrated that the tibia and radius and ulna were significantly longer than the femur and humerus, respectively, in dogs that were spayed or neutered at or prior to 8 months of age as compared to intact dog.)*
- *Several studies have shown that spayed and neutered dogs have a significantly higher prevalence of CCL rupture even when controlling for body size.*
- *Dogs that were neutered at least 6 months prior to a diagnosis of hip dysplasia were 1.5 times more likely to develop hip dysplasia than sexually intact dogs.*
- *Spayed/neutered dogs had 3.1 times higher incidence of patellar luxation.(8)*

### Cancer Prevalence

- *Spayed females had more than 5 times greater risk than intact bitches of developing cardiac hemangiosarcoma and neutered males had 1.6 times higher risk than intact males had of developing cardiac hemangiosarcoma.*
- *Spayed females had 2.2 times increased risk for developing splenic hemangiosarcoma.*
- *Male and female Rottweilers that were neutered or spayed before a year of age had 3.8 and 3.1 times greater risk, respectively, of developing bone cancer than intact dogs.*
- *In a second study, spayed/neutered dogs had a 2.2 times higher risk of developing bone cancer than intact dogs.*
- *Neutered dogs had a 2.8 times greater risk for developing any prostate tumor than intact dogs.*
- *Neutered dogs had a 4.3 times higher risk of developing prostate carcinoma.*
- *Neutered dogs had a 3.6 higher risk for developing transitional cell carcinoma of the bladder than intact dogs, and a 3 times greater risk of developing any bladder tumor.*
- *Spayed/neutered dogs had more than 4 times greater risk for developing transitional cell carcinoma of the bladder than intact dogs.*
- *In a survey of 2505 Vizslas, spayed or neutered dogs were found to have a significantly higher risk of mast cell cancer, hemangiosarcoma, lymphoma and all cancers together than intact dogs*

### Behaviour Considerations:

- *Early age gonadectomy was associated with an increased incidence of noise phobias and undesirable sexual behaviors, such as mounting.*
- *Significantly more behavioral problems in spayed and neutered bitches and dogs, with fearful behavior being most common in spayed bitches and aggression in neutered dogs.*
- *In a prospective study, German Shepherd Dogs spayed between 5-10 months of age had significantly increased reactivity.*

### Other Health Issues

- *Female, and sometimes male, dogs that are spayed/neutered before puberty have an increased risk of urinary incontinence and it is more severe in bitches spayed earlier.*

- *Spayed female dogs displayed a significantly higher risk of hypothyroidism when compared to intact females.*
- *A health survey of several thousand Golden Retrievers showed that spayed or neutered dogs were more likely to develop hypothyroidism.*
- *Neutered male and spayed female dogs had higher relative risks of developing hypothyroidism than intact females.*
- *Neutered females had a 22 times increased risk of developing fatal acute pancreatitis (multivariate analysis) as compared to intact females.*
- *Risk of adverse reactions to vaccines is 27 to 38% greater in neutered dogs as compared to intact.*
- *In a study of female Rottweilers there was a strong positive association between retention of the ovaries and longevity.*

Mandating dog de-sexing is not going to achieve what it sets out to. It interferes with an owner's right to decide what is best for the companion animal and significantly increases the risk of adverse outcomes and early destruction of the dog. This will affect thousands of dogs and is manifestly cruel.

Such outcomes can be achieved by good education and management practices. The government does not need to interfere with many thousands of dogs, to prevent a few hundred dogs becoming unwanted and needing rehoming. It is probable that the dogs requiring euthanizing will not be reduced, but this step will increase the numbers being euthanized for other health issues. I just don't get that.

There are many thousands of dog owners that use their dogs for sport including hunting, running, sledding, tracking and luring. They should not be made to harm their dogs because of a few bad owners and for these sporting dogs, it will be manifestly cruel for them to go lame and be unable to participate in the activities they love.

It seems unfortunate that there has been significant bias in the consultation paper and very little actual analysis of the true effect of such changes on dog owners. Statements such as "*A significant number of WA dog owners are already doing the right thing*" is just propaganda. I have always had healthy dogs and I will not undertake any action that puts the dogs at risk and have always done the right thing by my dogs. I draw into question the consultation paper in its aims to do as such.

There are numerous reasons against mandatory de-sexing that have not been addressed by the consultation paper and this is truly worrying.

Owners may not initially select a dog for breeding for a couple of years, there may a small gene pool of that dog and the owner may want to keep it intact, or the owner in conjunction with the breeder may be waiting to see if there are any inheritable issues with the dog.

Mandatory sterilisation has not effectively reduced the problem of puppy farmers anywhere in the world where it has been legislated. The AVA is not in favour of mandatory sterilisation for this reason.

To summarise –

- There should be no mandatory sterilization of dogs. The consultation paper indicates that 83% of owners already elect to do this when it is appropriate – it is a politically motivated step of no value. Unwanted litters do not arise from responsible pet owners.
- There are very real concerns about the adverse effects of de-sexing in some breeds.
- Mandatory de-sexing has not been shown to achieve the desired outcome.
- Mandatory de-sexing will result in reduction of the gene pool in some breeds and this may be an issue where there are concern about inheritable diseases.
- There should be no need for exemptions as mandatory de-sexing is unnecessary.
- There should be no penalty or need to have annual registration for unsterilized dogs, if they are registered, you know who they are and where they are. Increasing fees and making registration more difficult will only force young dog owners off the register – that is against the purpose of the changes.
- Mandatory de-sexing is opposed by multiple organisations and is plainly wrong.

#### **Reference**

Spivak, M. 2015. *Recent Research Raises Concerns Regarding Early Spaying/Neutering*.

Available from:

[https://www.researchgate.net/publication/284898359\\_Recent\\_Research\\_Raises\\_Concerns\\_Regarding\\_Early\\_SpayingNeutering](https://www.researchgate.net/publication/284898359_Recent_Research_Raises_Concerns_Regarding_Early_SpayingNeutering)

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?

There should be no mandatory de-sexing, it is a manifestly cruel practice in some breeds. Most owners elect to de-sex, but when is up to the owner and should be based around the benefits for the dog. Dog owners invest a large amount of time and money into their dogs and having the Government interfering with the dog's health care is just wrong.

The Consultation Paper is misleading and biased. Early de-sexing can result in significant adverse outcomes for the dogs. This is likely to outweigh the burden on rescue organisation and harm more than the reported 2500 dogs needing rehoming each year.

The evidence indicates that exemptions should apply for:

- Sporting Dogs,
- Gun Dogs
- Large Dogs
- Working Dogs

The owners should not be forced to get a certificate from a Veterinarian as this is likely to only result in rubber stamping of the owner's decision and will do little to stop puppy farming. It is an unnecessary expense on all dog owners and will encourage many not to register.



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

This question reflects the lack of process and thought behind the proposal of mandatory de-sexing. It would be ridiculous to impose mandatory de-sexing on all existing dogs, including geriatric dogs. This is inhumane and cruel. The evidence remains unclear when it is appropriate to neuter some dogs. Some can be neutered quite young however large dogs take a couple of years to mature, and early de-sexing will result in abnormal growth, joint disorders at an alarming rate and increased cancers. This is an Orwellian idea and should be abandoned.

## Centralised Registration System

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9. How will a centralised registration system benefit you?

It will not, this should be a Local Government issue.

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

Increasing registration fees and making them register annually for unsterilized dogs results in more unregistered dogs. The purpose of registration is to track ownership. It is a ridiculous situation to require a dog aged 7 or over, that is very unlikely to breed, to register annually. If the owner has been responsible and got it registered, then great. Don't penalise the owner for making a well informed decision about the dog's wellbeing.

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

No, it is just a system of creating more Government Bureaucracy, local governments are aware of the issues of the local area and can set rules according and provide resources appropriate to the needs.

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, if they are a breeder and have registered, then great. They will abide by the rules and register the litters, ensure their wellbeing and stick to the rules. If they don't they can't sell dogs. Simple, no need for annual registration.

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?

Demonstrated responsible individual

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

Yes, each local government has unique issues and they are aware of their problems.

# 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 <input checked="" type="checkbox"/>	Unsure <input type="checkbox"/>
No <input type="checkbox"/>	

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

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

Yes <input type="checkbox"/>	Unsure <input type="checkbox"/>
No <input checked="" type="checkbox"/>	

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

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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.]

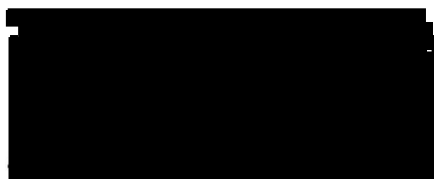
\* Attach further documentation if required.

## 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

Department of Local Government, Sport and Cultural Industries

GPO Box 8349

Perth Business Centre WA 6849

### Email

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