

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.

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:	██████
Surname:	██████████
Street or postal address:	Enter text.
Telephone (business):	Enter number.
Mobile telephone:	██████████.
Email address:	Enter text.

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

NB: Pet shop includes pet and pet product sales as well as grooming services

Transitioning Pet Shops to Adoption Centres

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

[Click here to enter text.]

Although most of the dogs I have had in the past have been rescued or rehomed, I would not get a rescue dog at this time. Like many people, my home is not suitable for a rescue dog. I have a young grandchild who I would never allow near a rescue dog. Even with a behavioural check, you can never guarantee how a rescue animal will react in any given situation, particularly if it has a history of trauma. The risk of an incident cannot be eliminated entirely with a rescue dog whose history will never be completely known and I would therefore never recommend a family with a baby or young child keep a rescue dog at home.

Even if I was to source a rescue dog, I think that rescue shelters are better equipped than pet shops to provide the necessary stability and care for potentially traumatised dogs. Shelter homes and pet shops provide different services which are not mutually replaceable. For example, shelters have foster and rescue networks, large areas for housing and exercise, and suitable premises to ensure the security of dogs and staff alike, none of which pet shops have. Both shelters and pet shops provide valuable services in the pursuit of animal welfare and each should be supported through the provision of funds (for shelters) and the maintenance of standards (for pet shops). Using pet shops as shelter outlets would result in the duplication of services, the dismantling of pet and specialist puppy shop businesses which do not possess the necessary skills and resources to rehome rescue dogs, and the strengthening of the black market in dogs. These issues are also addressed further in my response to Question 4.

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

[Click here to enter text.]

- Age
- Breed
- Reason for entry into shelter (e.g. abandonment vs seizure)
- History
- Health
- Behaviour

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

I strongly support the aims of the proposed reforms which are based on ensuring the health and welfare of dogs. However, the transition pet shops into adoptions centres will not help to achieve these aims. Most will shut down. Not only is this a personal disappointment to me, but this would not serve the public interests nor animal welfare imperatives as it will make it more difficult to regulate the industry while losing the valuable services provided by pet shops. In particular, pet shops are the only avenue for the supply of cross-bred dogs (aside from backyard breeders) and maintaining this supply is in the best interests of the community (who clearly want cross-bred dogs) and the dogs themselves.

Effect on the dog market

Excluding pet shops from selling dogs would in no way destroy the demand for them – as the Hon Lisa Baker notes in the consultation paper, ‘companion animals occupy a very special place in our lives’. Rather, without pet shops, members of the public will simply find it harder to source their new companions. While some may go to registered breeders, others will look online or through word-of-mouth. Already, more dogs are sourced from these mechanisms than from pet shops (Anne Barrowlough, *The Australian* Sep 19, 2015). There are many online scams and I often meet people in the course of my business who have spent a lot of money to purchase dogs online, only to be scammed. Excluding pet shops from selling pups would mean that, with fewer avenues for the legal purchase of pups, their prices will increase. This will increase the demand for (and profitability of) of online scammers and unscrupulous breeders while rendering it more difficult to monitor dog sales for compliance with standards. The average family will find it even harder to afford a dog while unscrupulous backyard breeders will be able to turn greater profits with no assurance of the welfare of the animals they breed and sell as they will be hidden from monitoring mechanisms.

The consultation paper does not adequately address the issues of backyard breeders and online scammers. While pet shops have many incentives to provide good-quality ethically sourced dogs, including business imperatives and the avoidance of legal and financial risks, backyard breeders have no such incentives. This is a rampant problem where individual members of the public breed dogs and then sell their litters, often online, through paper advertisements, or through word-of-mouth. The dog often have a variety of problems including being under-age, unvaccinated, unwormed. They often do not match their advertised description and are not provided with puppy care information, links into nearby vets, or any of the range of other support services which pet shops provide. They are more likely to be from a dangerous dog breed, which may not be apparent to purchasers. They are also more likely to have been interbred and less likely to have been genetically tested. They may also have a range of other health problems as they usually do not undergo regular health checks.

The loss of regulatory capacity

Pet shops are easily accessible to the public and subject to consumer law. These provide important benefits to the public. Specialist puppy shops like my own can be, and want to be, part of a regulated system where welfare standards guarantee the health and wellbeing of all dogs. Mandatory standards for dog breeding, housing, husbandry, transport and sale are long overdue in this industry and I would welcome the opportunity to contribute to the development and implementation of these standards. With appropriate monitoring and enforcement mechanisms, these standards can ensure all breeders treat and care for their dogs to the ethical standards which the community rightfully expects.

With so few across the state, pet shops/specialist puppy shops are easily monitored and tracked by enforcement bodies. The consultation paper estimates there are only 15 across WA but many of these will not sell dogs as the main part of their business. Given the small number of specialist puppy shops in WA, they are likely the easiest way to regulate dog sales – much easier than registered breeders, who operate in much larger numbers, and backyard breeders, who largely operate through the online ‘black market’. Instead of transitioning pet shops into adoption centres, only pet shops which function as specialist puppy shops should be allowed to sell dogs and these should be registered and subject to comprehensive monitoring. Shops could be subject to random inspections to ensure that every dog is properly

registered and traceable to an approved breeder. I do not sell dogs that are not already microchipped and would welcome any government official to come and inspect my shop.

Loss of community services

My puppy shop provides many valuable services to the community which would be lost upon the destruction of our business model.

1. *My shop provides a broad and flexible range of dog to suit the different needs and homes of West Australians.* For example, some families would prefer low-shedding dogs; others may require low-allergenic dogs. Some dogs are high-energy (e.g. Jack Russels); others prefer the indoors (e.g. Greyhounds). Having a broad range of purebreds and crossbreds available for sale means members of the public can easily source a dog that is suitable for them.
2. *I have broad knowledge and can provide impartial advice about the advantages and disadvantages of different pure- and cross-breeds.* Registered breeders tend to breed a small number of pedigree types and therefore have an incentive to emphasise the benefits of certain breeds over others, while having little experience with other breeds. This is not the case with specialist puppy shops; I have experience with a wide range of dog breeds and can therefore offer advice to families about which dog is right for them, advice which is both based on extensive experience with a wide range of breeds, and unaffected by business considerations. Whereas a breeder has an incentive to sell their own breeds, I am able to help families find the right breed for them.
3. *There are benefits to a consumer-based approach to animal sales.* While many registered breeders follow the high standards required by their associations, the purpose of pedigree breeders has always been the maintenance of certain pedigree features. This is because the dogs are bred for show, not for the public. These features are preferred by pedigree breeders for aesthetic reasons but they are not always in the best interest of the dog or the public, particularly when they lead to health issues. For example, German Shepherds and Labradors are bred to have a certain stance, which can lead to hip problems; Cavalier King Charles dogs are bred to have certain head shape which can lead to issues with their brains, while Pugs and French Bulldogs are bred to have short muzzles which can lead to breathing difficulties. Pet/puppy shop owners, on the other hand, provide services to the public and so our main concern is the satisfaction of our customers. That satisfaction depends on the health and wellbeing of the animals we provide, and is protected by consumer law.
4. *Puppy shops build relationships with dog-owners in the community.* After purchasing a dog, customers return to my shop regularly to buy supplies including biscuits, fresh meat, medicines and toys as well as to access my grooming services. Without ongoing contact, people may purchase a dog and have no other contact with anyone in the animal care/pet industry, including vets, except on their own initiation. With ongoing contact, I am able to build long-term relationships with both dog-owners and, importantly, their dogs too which I have known since they were pups.

I am therefore well-placed, with decades of knowledge and experience as a pet and puppy shop owner and dog-owner myself, to provide customers with free and informal advice whenever they need to purchase any products. Studies have shown that programs which help people with their pets reduce the rates of dogs requiring rehoming (Chua, Rand and Morton, 'Surrendered and Stray Dogs in Australia', *Animals*, 2017). I provide many such services as a matter of course in my business, including:

- information about healthcare requirements, and assistance with healthcare costs, upon purchase (e.g. discounts to vets)
- behaviour counselling
- dietary advice
- free nail clipping and other grooming-related services.

I also give my mobile phone number to all of my customers and encourage them to call me *at any time* if they have any issues.

In addition to benefits associated animal welfare, my provision of these services relieves the pressure on veterinary services while also providing the public with low-cost options for advice and support about matters which do not require veterinary expertise (e.g. how to manage bad breath or minor challenging behaviours). As mandatory de-sexing will place increased pressures on vets, the maintenance of these services will be important in supporting the industry to adapt. There may also be public policy advantages to maintaining this ongoing contact between community members and pet/specialist puppy shops. For example, shops could support a public awareness campaign through requirements to display signage warning visitors about avoid online or word-of-mouth sales, informing them of nearby rescue shelters, and advising them to always check the registration details of dogs to ensure they have been ethically sourced.

5. *Importantly, pet/puppy shops provide the safest avenue for community access to cross-bred dogs.* Registered breeders in WA only breed pedigree dogs because their associations do not allow them to breed cross-breeds. By limiting the retail purchase of dogs to registered breeders, the proposed reforms will essentially prohibit the purchase of cross-breeds which are unavailable from registered breeders. This would drive a black market in cross-breeds where unscrupulous backyard breeders will be able to turn increased profits selling cross-bred dogs as rare commodities, with no way to ensure welfare standards. It also raises the question of whether the proposal would be constitutional as it would effectively protect WA breeders from interstate competition and therefore may run afoul of section 92 (particularly given that the proposal is clearly disproportionate to its objectives).

The rationale behind this move is unclear and the consultation paper does not address how the public will be able to buy cross-breeds under the proposed reforms. While many registered breeders ascribe to the view that purebreds are superior to crossbreeds, this is in fact a dangerous, eugenicist view which ignores the health problems associated with pedigree dogs. It would be incredibly concerning if the reforms were based on this perspective.

Purebreds often have increased risks for a range of inheritable disorders. These have been well-catalogued in a variety of scientific resources (see <https://www.vet.cam.ac.uk/idid/> or <http://cidid.discoveryspace.ca/how-are-defects-inherited.html>) and I have already referred to some of these (e.g. the breathing problems of brachycephalic dogs like Pugs and French Bulldogs, the hip problems of Labradors, etc.) By introducing new genetic lines, the chance of these genetic conditions being inherited is lessened. I would strongly encourage the Committee to look through these resources to understand the benefits of cross-breeding which include the improved health and wellbeing of dogs, reductions in birth rates of dogs with genetic conditions.

Although these risks can be mitigated by proper pedigree breeding practices, they cannot be eliminated, particularly in Australia where the genepools are relatively small. Just like humans, the genetic inheritance of dogs are underpinned by fundamental scientific principles that cannot be avoided. This is why the same issues arise among humans as dogs, with particular ethnicities having genetic susceptibilities to specific disorders (e.g. sickle-cell anaemia among people with sub-Saharan African ancestry, and Tay-Sachs disease among people with Jewish ancestry).

'Designer hybrids' are cross-breeds which been particularly chosen for their beneficial traits. Cross-breeders began to increasingly experiment with different cross-breeds in the late 1990s after veterinarian, animal welfare advocate and TV personality 'Dr Harry' recommended buying Cavoodles (Cavalier King Charles X Poodle) over Cavalier King Charles in order to avoid genetic problems. The most successful cross-breeds were those that carried lower risks of these disorders while inheriting the beneficial traits of their purebred parents. For instance, while Poodles suffer higher rates of post-renal atrophy, Cavoodles are less likely to inherit this disorder, while still potentially inheriting the low-

allergenic properties of their Poodle parent. They are also likely to be smarter than their Cavalier King Charles parents (whose head shape restricts their brain development). This makes cross-breeds an ideal family pet as their beneficial traits can be secured while lessening the risks of inherited genetic mutations. They are also increasingly popular with members of the public as evidenced by the increased prices which they can sell for.

While the consultation paper makes no mention of this issue, the 2015 Steering Committee report makes a few comments about cross-breeds but only in the context of the profitability of puppy farms. At no point does the report acknowledge the health benefits of cross-breeds, or the preference among members of the public for cross-breeds, nor is there any suggestion of any problems with the cross-breeds themselves. Yet the report and consultation paper present reforms that prohibit the supply of cross-breeds. This appears to be a tacit endorsement of the views of registered breeder associations that dogs should not be cross-bred. Neither the report nor the consultation make any attempt to justify this point of view. In fact, the continued and *ethical* cross-breeding of dogs serves the public interest in many ways including:

- improving the health and wellbeing of dogs through the reduction of genetic risks associated with pedigree breeding
- improving the suitability of companion animals for dog-owners, including through the reduction of health risks and associated costs, while maintaining beneficial pedigree traits
- serving the interests of the community who have a demonstrated preference for cross-breed dogs, as evidenced in their higher prices, and may be for a range of aesthetic, ethical, health-related or other reasons.

I am therefore extremely concerned about this proposal which will do nothing to disrupt the puppy farm supply chain that regulation and enforcement would not achieve. Instead, this proposal will incentivise the black market, lead to even higher prices for cross-bred pups while increasing the proportion of dogs at increased risk of genetic abnormalities. This is neither in the best interests of the community nor of our companion animals.

I would strongly urge the Government to consider the various advantages which specialist puppy shops have to offer, and allow us to work within a properly regulated system that can ensure the welfare of all dogs. Utilising the visibility and accessibility of retail shops to maintain standards is surely a much better way to achieve animal welfare than destroying our business models and ensuring the cross-bred dog trade can only operate underground.

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

Under the new law, my business would have to shut down. A few years ago, I nearly had to close my shop as the premises were too small to sell many dogs. I recently relocated my shop from Belmont to larger premises in Claremont where I am now able to focus on dogs with pet products and services as a sideline. Currently, the viability of my business depends on the sale of dogs. All of the other services I provide (including grooming and the sale of pet foods, medicines, toys and other animals and pet products) do not bring in enough revenue and I depend on dog and dog-related sales for my living.

I understand that this business model would not be viable for other specialist puppy shops. This means that the proposed transition would not achieve its objectives to increase the rehoming of dogs, reduce euthanasia rates and relieve the pressure of rescue shelters. While these are worthy objectives, specialist puppy shops are simply not able to adapt to the adoption centre model and so would shut down before rehoming any dogs, nor are our customers necessarily appropriate clients for 'adoption centres' as rescue dogs have different needs to young pups. Many people are refused dogs from shelters as they, their families or their homes are not considered suitable (e.g. older people, or families with children may not be

suitable, or people living in small houses, or open properties). Shops like mine provide an important service for these people. As for reducing euthanasia rates, figures from the RSPCA in WA for 2017 showed that of 122 dogs euthanised, 62 (51%) were for medical reasons and 60 (49%) for behavioural reasons. It is entirely counterintuitive to expect specialist puppy shops to reduce euthanasia rates when euthanised dogs are sick or potentially dangerous; these are entirely unsuitable dogs to be selling to families.

Selling rescue dogs is not viable for my business for several reasons:

1. *Space requirements:* Rescue dogs could not be sold to customers without having them on the premises. People must have a chance to see and interact with their companion animal before they purchase it. Specialist puppy shops could not simply act as intermediaries for customers and rescue shelters. Most people would prefer to go to rescue shelter themselves so they can pick the right dog for them where they have a range of choices – and rightly so.

Nor could rescue dogs be housed in shops. They tend to be much older and therefore larger than puppies. This would require a significant amount of additional room for housing and exercise. Currently my shop includes 6 pens on display which house 3–4 pups at a time (depending on size) and an exercise area approximately 7x3.5m. It would be cruel to keep older dogs in pens this size, nor is the exercise area large enough for older dogs. The shop cannot simply be refitted to suit larger dogs – I would require premises significantly larger than I have now in order to keep larger dogs in any kind of suitable condition. This would be far too costly to be economically viable.

The transitional arrangement for rescue dogs to be sold alongside younger dogs is also not a workable solution. This is because the options I would be able to offer to my customers would be very limited. Rescue shelters often contain dozens of dogs so that people can find the right dog for them. This is essential for three reasons: firstly, the histories of some rescue dogs is such that they would not be suitable for many homes; secondly, the family lives of many West Australians are such that they would not be suitable for many rescue dogs (e.g. due to the presence of young children or the limited size of the home); thirdly, dog rescuers and specialist puppy shop customers alike don't just want any dog – they want the right to pick their own companion. Offering enough dogs so that the right owner can be paired with the right dog is simply not something a specialist puppy shop would be able to achieve with rescue dogs.

2. *Different marketplaces:* Rescue dogs are generally different breeds to those provided in specialist puppy shops. So too are the people who visit rescue shelters generally not the same people as those who visit specialist puppy shops. Of course, there is overlap but generally we are talking about different markets with different customers, different 'products' and different demands.

Generally, specialist puppy shop customers are families seeking new members of their family. As such, the most popular dogs are the small, fluffy varieties which are not only more aesthetically pleasing to most people, but make good companions for children as well as adults, and are more suitable for modern-day living in small blocks. Pups are also more popular than older dogs, especially with children. They are easier to train and therefore easier to subsume into a family. These are the kinds of dogs that specialist puppy shops sell. Rescue dog, on the other hands, are often older and larger; they are also sometimes more dangerous breeds; they are simply not suitable for the family-orientated 'puppy market'. Rescue dogs require additional support and care than pups do and the majority of West Australians seeking a companion animal simply do not have the time or home environments suitable to rehoming a dog.

3. *Different business models:* There is a reason why specialist puppy shops are businesses and rescue shelters are charities. The business models of puppy shops are different to rescue shelters which can rely on charitable donations to fund the costs associated with housing and caring for large dogs. My shop already relies so heavily on the sale of dogs to subsidise other services that I cannot imagine how I could survive on pet products alone,

nor could I compete with rescue shelters without donations. My business simply does not make enough money to afford to house and sell large, unpopular dog breeds.

Furthermore, the success of specialist puppy shops depends on their accessibility. They are able to be more accessible because less space is required for pups, and so shops can fit into residential areas more easily. Puppy shops transitioning into adoption centres would need to move to new premises and so would likely end up in the same kinds of places as rescue shelters in order to suit their new needs – in the end, they would lose their accessibility. This proposal would not simply turn puppy shops into rescue shelters, it would require puppy shop owners to set up rescue shelters instead. These new shelters would be unlikely to be any more successful than current rescue shelters which have significantly more experience than we do in providing their services.

4. *Competition:* If specialist puppy shops were to provide rescue dogs to the public, they would essentially be competing with rescue shelters to provide the same service. The increased visibility of rescue dogs is not likely to increase the demand for them, given the differences between their needs and those of families seeking companion animals. This means that puppy shops and rescue shelters will begin competing for the same customers. Rescue shelters will likely keep the best dogs for themselves while adoption centres will need to sell the dogs they can acquire for even higher prices to cover the additional overhead costs including the costs of acquiring the dogs. Particularly since puppy shops would not be able to receive charitable contributions, there is no way they could compete with rescue shelters which are already set up, with relevant experience and an established 'customer base'. Puppy shops simply will not be able to compete.
5. *Sustainability:* Reducing the number of dogs needing rehoming is an admirable goal and I support all of the other proposed reforms which I believe will help to achieve this goal, particularly mandatory de-sexing which will break the ability of backyard breeders to sell dogs which is the biggest driver of the overbreeding and mistreatment of dogs in WA. As the number of dogs needing rehoming decreases, so too will the pressure on rescue shelters and the supply of dogs available to 'adoption centres'. This means that, even if the transition were possible, adoption centres would find themselves facing a diminishing supply of dogs for sale. Not only is this business model unviable in the short-term, but the sale price of my business will be destroyed with no prospect of sustainability.

Mandatory dog de-sexing for non-breeding dogs

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

I support the mandatory de-sexing of dogs of non-breeding dogs. This policy is well-targeted to its objectives and will help to reduce overbreeding, reduce the number of unwanted dogs, relieve pressure on rescue organisations and shelters, and improve the health and wellbeing of dogs. With the new registration requirements, it would help to drive down the market for backyard breeders as the legal risks would increase. However, it may disincentivise dog-owners taking their dogs to vets if they don't want them de-sex which could lead to increased 'public health' issues including increased rates of parvo virus. It is also important to maintain legal avenues for purchasing cross-bred dogs, as reducing the public's access to these popular dogs would increase demand for backyard breeders meaning that many will continue breeding dogs despite the legal risks, incentivised by increased profits. Furthermore, if this policy is not complemented with a legal avenue for the breeding and sale of cross-bred dogs, it will increase the proportion of pedigree dogs which, regardless of breeding standards, have increased health risks associated with genetic inheritable disorders (as discussed in Question 4).

8. 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?

[Click here to enter text.]

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

[Click here to enter text.]

It is essential that existing dogs be subject to the same mandatory de-sexing requirements to stop backyard breeders from breeding their dogs. Of course, de-sexing will not be necessary for dogs who are too old to breed. Advice from veterinarians should be sought about the appropriate age at which de-sexing is not necessary.

Centralised Registration System

10. How will a centralised registration system benefit you?

[Click here to enter text.]

A centralised registration system will be important so that customers of specialist puppy shops can be assured of the ethical source of the dogs. If implemented, this would preclude the need for the proposed transition of pet shops into adoption centres by providing an easy way for enforcement bodies and members of the community to check the supply chains of specialist puppy shops.

11. 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

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

[Click here to enter text.]

Yes.

13. 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?

[Click here to enter text.]

Yes.

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

[Click here to enter text.]

Allowing specialist puppy shops to sell dogs would improve compliance with registration requirements as registration could be incorporated into the sale process. This is a service I already provide: every dog I sell is registered upon sale. This means that specialist puppy shop customers are relieved of administrative burdens while the rate of dogs sold through shops can be a guaranteed 100% (assuming compliance which may be monitored).

It is also important to note that customers purchasing dogs from pet/puppy shops have the protection of consumer laws if there are any issues with the animals sold. It is imperative that breeders providing directly to the public are subject to the same laws. Breeder registration should therefore include all business registration requirements.

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

[Click here to enter text.]

It is essential that breeders have the requisite knowledge and experience to breed and care for dogs. They should also be monitored regularly for compliance with breeding standards.

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

[Click here to enter text.]

Local governments are already overburdened. They require additional staff and resources to ensure proper enforcement and monitoring. There may be advantages to centralising this in a single enforcement body to minimise costs.

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

17. Should people who breed dogs have to comply with minimum standards for the health and welfare of their dogs?

Yes

Unsure

No

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

[Click here to enter text.]

It is essential that breeders have the requisite knowledge and experience to breed and care for dogs. They should also be monitored regularly for compliance with breeding standards.

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

Yes

Unsure

No

I would defer to the views of vets on this matter but I understand that different breeds may be able to produce different amounts of litters. The maximum litter number may therefore be set according to veterinarian advice for different breeds. It may also be possible for a provision to allow bitches to produce additional litters upon veterinarian approval.

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

All breeders should be required to maintain the same standard of care for dogs. The motivation of the breeder is irrelevant to the health and wellbeing of the animal which should be guaranteed regardless. Any standards which should be applied to commercial breeders should apply to all.

21. 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:

Please provide reasons:

[Click here to enter text.]

Mandatory standards are essential to ensure animal welfare. This would be best achieved by standards that are focussed on the welfare of the animals, rather than arbitrary caps on the number of breeding dogs. While this number may be a factor worth considering in applications for breeding licenses, it should not be a determinative factor. This is because there are benefits to economies of scale. For instance, larger breeders may be better able to afford to pay for additional services (e.g. more vet visits). I am aware of one commercial breeder which, because of its size, was able to pay for people with intellectual disabilities to play with the dogs – this helped them to socialise and also provided a good service for the public. It should not be assumed that large commercial breeders cannot operate ethically – their ability to do so should depend entirely on their ability to comply with all relevant standards. The size of their operation is irrelevant so long as the dogs are well looked after.

* 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

This submission may be published if all identifying details are removed, including my name

Signature: _____



Date _____

1/8/2018

Please return this form to:

Please return submissions by 4pm on Friday 3 August 2018

Post

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