



Australian Veterinary Association

Submission on the

'Stop Puppy Farming' Consultation Paper

Western Australia

2018



The Australian Veterinary Association (AVA) is the only national association representing veterinarians in Australia. Founded in 1921, the AVA today represents 9500 members working in all areas of animal science, health and welfare.

Veterinary roles extend far beyond caring for the health and welfare of our pets and production animals. Veterinarians are the pathologists, field officers and inspectors that secure the safety of our food, ensure market access for our exports, and help to safeguard the human population from zoonotic diseases.

‘Stop Puppy Farming’ Consultation

The Western Australia State Government made an election commitment to stop puppy farming in Western Australia. Following this, the ‘Stop Puppy Farming’ Implementation Working Group was formed to assist the Government with this election commitment.

The aim of the Working Group was to, ‘provide expert comment on the consultation paper before release’ and, ‘provide advice on the implementation of the initiatives to stop puppy farming and reduce the number of abandoned dogs’.

The AVA strongly supports activity to improve the welfare of companion animals in our community and was pleased to be part of this working group. However, the AVA does have concerns over the rigour of the process. While the broad aim appears to be about addressing puppy farming, the process lacked a clear definition of the problem that it seeks to address. There is an over-arching aim that is well-intentioned but no clear objective problem, such as reduction in number of puppy farms in Western Australia, reduction in health issues due to poor breeding methods, reduction in incidences of unregulated breeding or a defined reduction in number of abandoned dogs that is specific to region. This lack of clear numerical definition of the problem to be solved is a symptom of lack of clear data on the extent of unregulated breeding or reasons for dog abandonment.

Unfortunately, this has carried over into the current consultation paper, which is similarly light on definition and data.

The consultation paper focuses on four proposed changes to legislation:

- Transitioning pet shops to adoption centres
- Mandatory dog de-sexing for non-breeding animals
- Centralised registration system
- Mandatory standards for dog breeding, housing, husbandry, transport and sale

A rigorous dog registration system coupled with a comprehensive breeder registration system will provide a high level of traceability of dogs in the community. These two tools will give enforcement officials what they need to trace and address puppy farming where it occurs.

The other two policy measures – transitioning pet shops and mandatory desexing - that are suggested are unlikely to result in any evidenced-based outcomes and have a range of potential negative side-effects.



The AVA Western Australia branch undertook an electronic survey of attitudes towards the proposed new measures in the consultation paper. This survey was distributed by email during the consultation period to all AVA members and registered veterinary surgeons of Western Australia, and included 141 respondents. Some of the preliminary data from this survey is provided within this report, when references are made to 'veterinarians surveyed'. The final results of this survey are intended to be communicated at a later time.

Puppy Farming

From an AVA perspective, puppy farming refers to the intensive over-breeding of dogs under inappropriate conditions which fail to meet the animals' behavioural, social and physiological needs. Puppy farms may contain large numbers of breeding animals confined in overcrowded and unhygienic conditions that lead to health and psychological problems in breeding animals and their offspring. They are usually large-scale commercial operations, but similarly inadequate conditions may also exist in small volume breeding establishments which may or may not be run for profit.

In puppy farms, dogs are provided with minimal, if any, health care and may be permanently confined in cages. Puppies are often poorly socialised and unhealthy as a result of their inappropriate rearing environments. The scale of puppy farming is unknown, although believed to be widespread. Puppy farming is a major companion animal welfare issue with a high level of public concern.

Transitioning pet shops to adoption centres

The primary concern of the AVA is the welfare of the animals involved. Regardless of whether they are bred puppies or animal for rehoming, there needs to be comprehensive standards and guidelines on how animals are kept and cared for in the pet shop environment. From an animal welfare perspective, if an animal for rehoming can be adopted through a pet shop in a way that protects its health and welfare, then the same can be done for an animal bred for sale. Only 61% of veterinarians surveyed agreed with pet shops housing dogs available for adoption, indicating some reservation about this suggested measure.

The AVA does not oppose puppies being sold in pet shops. However, the AVA would urge that the focus remain on the welfare aspects of the housing of any puppy or dog, and question whether a pet shop is the best housing environment, especially for puppies at a young age. Ideally, any prospective pet owner should visit the premises where a puppy was bred, engage with the breeder, meet the parents of the puppy, and view the environment him or herself. But there also may be some benefits for pet shops to source puppies for sale. Indeed, the NSW Parliamentary Inquiry found that pet shop sales should not be banned because this would lead to reduced scrutiny of animal sales without improving welfare.



When puppies are sold in pet shops, it is important that the breeder of origin can be easily identified, so that breeders can be checked for compliance with any compulsory breeder standards. To this end, the introduction of breeder registration is supported, and introduction of compulsory breeder standards is strongly encouraged.

Mandatory Dog De-sexing for non-breeding dogs

The AVA has considerable concerns over the proposal to introduce mandatory sterilisation of all dogs, only exempting those that are licensed for breeding or where a veterinary exemption has been given. Although the AVA is supportive of sterilisation as a general principle, there is a paucity of evidence as to whether or not implementing *mandatory* sterilisation for dogs will increase rates of sterilisation or reduce the numbers of abandoned dogs in shelters or pounds. Indeed, only 55% of veterinarians surveyed agreed that mandatory sterilisation would reduce the number of non-desexed dogs in their area of practice, indicating a notable degree of scepticism in the veterinary community.

We are also concerned about the negative impacts of making this surgical procedure compulsory. These concerns are primarily focused on the potential negative animal health and welfare results, however there are also potential impacts on veterinarians and on veterinary businesses.

The perception that veterinarians might have a role in enforcement of the legislation may lead sections of the pet owning community to avoid veterinary clinics. This would have profound health and welfare implications when they avoid regular health checks, skip vaccinations, or delay bringing sick or injured animals to the veterinary clinic. This impact would be larger in existing areas of lower sterilisation rates, including regional Western Australia. Amongst veterinarians surveyed, 59% of responding veterinarians expressed concern that if mandatory sterilisation is implemented, then clients will avoid veterinary treatment, for fear of being 'reported' that their pet is intact.

Some breeds of dog, especially medium to large breeds, are predisposed to health problems if sterilised before skeletal maturity, and a blanket compulsory desexing law is likely to be overly prescriptive in terms of age for compliance. It is important that there is flexibility and veterinary discretion permitted, in decisions about whether to sterilise, and at what age to perform the procedure.

The AVA also has concern over the impacts on veterinarians. Unhappy owners who do not want to sterilise their dogs may place pressure on veterinarians to either sign exemption letters or reduce fees associated with sterilisation. The majority of veterinarians surveyed (55%) agreed that this potential negative impact was concerning. This may lead to abuse of veterinarians and clinic reception staff in practice and increased psychological stress. Veterinarians and their support staff are already at high risk of mental health disorders.

Veterinarians may need to increase their workload of sterilisation procedures, which in many clinics are already heavily discounted. This means that veterinarians will spend more of their time doing work that is essentially a community service and not profitable. Hence placing upward pressure on pricing of procedures. Amongst veterinarians surveyed, 54% responded that mandatory sterilisation



would likely not affect their profit margin, with 14% indicating that it would likely decrease their profit margin.

Centralised Registration System

Responsible ownership involves a duty to care for the health and welfare of the animal and to consider the rest of the community and to comply with appropriate legislation. Registration and permanent identification of all dogs should be compulsory, but can only be effective if there is vigorous enforcement by local government authorities.

Centralised registration systems have some merit, particularly if they allow for the movement of people and pets between local government jurisdictions. The veterinary community appears to welcome this initiative, with 80% of respondents being supportive of a breeder registration database. However, care must be taken to ensure that the veterinarians are neither expected to enforce legislation, nor that the community perceives them, by virtue of the system design, as having a role in enforcement.

To maximise the percentage of the dog population that receives appropriate health and welfare care, we need to minimise the barriers to animals being presented at veterinary clinics. If there is a community perception that veterinarians have an enforcement role in registration systems, then it is likely that this would act as a deterrent and reduce the number of animals receiving veterinary care.

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

The AVA strongly supports the introduction of standards for the breeding and sale of dogs, and 77% of veterinarians responding to the survey agreed. Enforceable dog breeder standards are an important tool to support investigations and prosecutions of suspected puppy farming activities or to form the basis of regular compliance inspections linked to breeder identification renewals. These Standards should be adopted into legislation as compulsory codes under the animal welfare legislation.

Dog Breeder Standards should include chapters covering at least the following topics: responsibilities of owners; animal health and veterinary care; housing and environment, hygiene and management; breeding and rearing; socialisation and environmental enrichment; management of inherited disorders; transfer of ownership and requirements for identification.

Specific Standards should include: minimum age of breeding, maximum number of litters in a lifetime of a breeding bitch, maximum age of breeding; appropriate preventative health regimens including veterinary examinations; management of breeding activities including mating and whelping; rearing, weaning, socialisation and practices that promote behavioural health and wellbeing; housing and space requirements; and requirements for record keeping.



The AVA will provide specific feedback on the standards in the consultation on the 'WA Standards and Guidelines for the Health and Welfare of Dogs'.

We caution against using arbitrary limits on the numbers of breeding dogs allowed. There is no scientific evidence that capping a breeder to a certain amount of fertile females will improve animal welfare. The number of animals kept by a breeder is not a factor that determines the welfare of those animals. This is a view that has been conveyed to us by our members and was a finding in the New South Wales parliament's Inquiry into Puppy Farms. Animal welfare is not dictated by a number; therefore the AVA strongly opposes any cap that restricts breeding establishments to a maximum of fertile females. Poor animal welfare can occur with breeders that have one breeding dog or numerous fertile females.

Further information

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