



Bullmastiff Club of Western Australia (BMCWA)

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Stop Puppy Farming
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SUBMISSION ON 'STOP PUPPY FARMING PROJECT': THE BULLMASTIFF CLUB OF WESTERN AUSTRALIA

Background

The Bullmastiff Club of Western Australia is a breed club dedicated to the health, welfare and promotion of the purebred bullmastiff breed. We are affiliates of the National Bullmastiff Breed Council, The Canine Association of Western Australia (DogsWest) and the Australian National Kennel Council (ANKC). Our members include ANKC - registered breeders of bullmastiffs, breed fanciers, trainers, behaviourists, health care / veterinary professionals and pet owners.

Our club was established in 1993 and is now in its 25th year of breed welfare, promotion and guardianship of this majestic breed. We have a small membership base; however a large following through social media and the various platforms we use for breed education and support and networking across the globe.

The original Bullmastiff was developed by Gamekeepers to patrol large English Estates and to assist them in catching poachers during the latter part of the 19th century, at a time when poaching game was rife even though it was a hanging or transportation offence. The gamekeeper needed a large dog to protect him from being attacked by a poacher, who had everything to lose if caught poaching.

The Bullmastiff was originally developed from the English Mastiff and the British Bulldog to produce a large courageous loyal dog taught to 'bail up' the poacher and stop him from escaping, by 'holding' or 'pinning' but not by biting or mauling the poacher.

The Bullmastiff today is a large loyal obedient dog which is a natural guardian of the home and its family. It is particularly well known as a breed which is very safe around children.

The Bullmastiff Club of Western Australia spends its time in a volunteer service position providing breed promotion, education, assessment, health and welfare checks, breed identification, media communications and provision of rescue and rehoming services as well as running dog shows for the breed. We are a club that has for 25 years worked to preserve our breed and ensure it has a visual presence within Western Australia.

Our ANKC-registered breeders are accountable for the health, parentage, breeding environment and registration of the puppies they produce, and there are a variety of mechanisms to ensure that accountability. They are bound by a comprehensive constitution that includes a Code of Conduct and a Code of Ethics, which are enforced by DogsWest.

All our breeders are members of DogsWest and must register all progeny whether pets or kept for breeding stock. Also, for some breeds specific health testing of prospective breeding dogs prior to mating is mandatory. They must provide comprehensive information to each puppy buyer for the care, welfare, appropriate housing, training and socialisation of every puppy sold. As members of our State controlling body it is compulsory that all breeders must register all puppies born, and it is also compulsory for each puppy to be microchipped prior to going to their new homes. The breeder is also responsible for the transfer of the microchip into the new owner's name.

The introduction of mandatory testing for hips and elbows of ANKC registered bullmastiffs prior to mating has seen a marked reduction in the breed average for hip dysplasia and OCD. Bullmastiff breeders, through supporting research at the University of Sydney, are now embarking on the development and implementation of a structured testing program to investigate and where practicable reduce the genetic and potential hereditary effects of Lymphoma on the breed.

The ANKC has also adopted a rule requiring ANKC Registered breeders not to breed their bullmastiff bitches prior to 20 months of age. The WA Bullmastiff Club has an additional rule which prevents the breeding of bitches before two years of age.

Our breeders voluntarily undertake other forms of health testing such as for cardiac, thyroid, entropic and now lymphoma all of which involves extensive non recoverable cost, but is an investment in the health of our breed and ultimately our pets.

The Bullmastiff Club of Western Australia supports a National breed rescue service that is fully resourced from fundraising through our club members and breed fanciers, all of our state breed coordinators are volunteers who dedicate countless hours and personal resources to protect and rescue the bullmastiff. This is discussed further below.

1. Government proposal for Mandatory desexing

We vehemently oppose the mandatory sterilization of our breed, and in fact of any breed, at any age, except where required for medical reasons because of the wealth of scientific evidence showing permanent desexing has adverse consequences for dogs, including:

- a) Reduced lifespan of dogs which have been permanently desexed. The Government states that permanent desexing will increase a dog's longevity, but the scientific evidence does not support this position at all, and in fact shows their longevity is reduced,
- b) Increased risk of cancer in dogs that have been permanently desexed, particularly in bitches. The Government states that permanent desexing will improve the health of dogs, but this is not supported by the scientific evidence.

- c) Desexing at any age increases the risk of urinary incontinence in both dogs and bitches and the need to medicate dogs for the rest of their lives to manage this problem
- d) Scientific research shows that male dogs that are permanently desexed at a young age, are likely to develop increased fear reactivity, fear phobias and anxiety later in life, increasing the risk that they will become unmanageable as family pets and be dumped in rescues and/or euthanised.
- e) The Bullmastiff does not reach maturity until it is between three and four years of age. Growth plates do not fully close until between 12 and 18 months. Where desexing prior to maturity has occurred there is a clear link in adverse health outcomes for joints, muscles, increased risk of sarcomas, endocrine disorders and more. In cases where pups have undergone early desexing between six and twelve months there are significant increases in poor outcomes for hips and elbows which is leading to dogs suffering prematurely from arthritis and significantly increasing the risk of damage and tearing of cruciate ligaments requiring costly surgery and difficult and painful rehabilitation all due to uneven bone / muscle growth from the lack of developmental growth hormones.
- f) The bullmastiff is a guardian breed that should be confident, alert and not fearful or timid. An early spay / neuter whilst the puppy is still in its growth phase (prior to reaching maturity) will impact and has been shown scientifically for other large breeds to be the cause of anxiety, increased fear period and overall an unmanageable dog that will ultimately end up in a shelter or pound as a number that may or may not be mentally salvageable..

Certain medical conditions in the dog only develop or become apparent with age. Mandatory desexing will remove from the gene pool healthy dogs free of such conditions; which in a small state such as Western Australia is disastrous for our ANKC registered breeders' ongoing pursuit of the eradication of such medical conditions via breeding to dogs free of such conditions and traits.

We are also aware that all the surgical methods of desexing bitches have some downsides, and so many members do not want to desex their bitches once they are no longer at their peak for breeding and showing.

As experienced dog owners we are aware that there are many dogs which are poor candidates for surgical desexing, such as any aged dogs and dogs with heart conditions.

We understand that there are various non – surgical methods of temporarily or permanently sterilising dogs, but these are not fully tested to date to ensure they are effective, and there are no downsides to them.

Conformation showing is principally based on exhibiting entire dogs/bitches from young pups through to fully mature adults and veterans. Mandatory desexing will destroy our sport in Western Australia and throughout Australia. Consider a Perth Royal Agricultural Show without the Dog Pavillion which has a long and illustrious history in the show arena.

Somehow we do not believe that cardboard cut outs with audio talks on how these dogs used to be presented and showed will be the same draw card for the young and young at heart.

Our pure breed is the product of generations of selective breeding to produce a dog /bitch suited for a specific purpose living in association with its human family (which includes the mental stability and the physical health and endurance to undertake those designated tasks). While some people prefer a cross bred dog, many others love their pure breeds for their consistent temperament, character, working functions, size and confirmation. In a small State such as Western Australia, mandatory desexing will result in far fewer pure breed dogs being available which we feel is to the detriment of our dog-loving community.

Some of our members already have in place contracts requiring the sterilization of dogs sold as pets including the offer of incentives (monetary reimbursement) for the sterilization of their pets at a more appropriate age on the production of their veterinary sterilization certificate. Many members also undertake the alternative options such as Ovary Sparing Spey and Vasectomy which removes the risk of reproduction of pets that do not have the desired breed traits, but does allow them to grow and develop to their full potential without harm.

We believe that education and incentives are the most effective approach to preventing indiscriminate breeding of dogs.

We agree wholeheartedly with the Government’s Consultation Paper which states:
Your veterinarian is the best person to discuss the pros and cons of de-sexing your dog, the age the procedure is done, and determine the best strategy for your pet based on breed, lifestyle, longevity expectations, concurrent diseases, cancer risks, and other considerations for intact and de-sexed dogs.

We believe this commonsense and practical approach is the way to go in terms of the issue of desexing dogs, and state again that we are strongly opposed to mandatory desexing of dogs.

Mandatory desexing – Breeder’s terms

Restrictions under the WA Dog Act make it very difficult for many DogsWest breeders to maintain a breeding program and to maintain their hobby of showing bullmastiffs, without the ability to have their dogs living full and happy lives with other families in the wider community – what we call owned under 'breeders Terms'.

These dogs must be exempt from mandatory desexing – they are part of the wider DogsWest community of registered pure bred dogs and may be crucial to maintaining a wide gene pool for the breeding of healthy pure breed dogs and to prevent breeds with small numbers in Western Australia from becoming extinct.

2. Government proposal - Registering owners of entire dogs as a ‘Registered Breeder’ with their Local Government

Our Club is strongly opposed to the proposal that owners of undesexed dogs will be required to be approved by their local government as a ‘registered breeder’.

This proposal is totally unjustified, it will not stop puppy farming or puppy farmers, and we feel all it will achieve will be to destroy many DogsWest Members' participation in showing and other doggy sports, for those large number of members who do not live in kennel zones, where larger numbers of dogs may be kept.

We have discussed above the reasons why pure bred dogs should not be mandatorily desexed, and we strongly believe that for the health and wellbeing of pure bred dogs, this should remain (as is the current situation) a decision made between the owner and their vet.

Knowing that there are no valid, justifiable reasons for mandatory desexing, the Government's proposals to then require owners of 'entire' dogs and bitches to be registered as breeders is a nonsense and a very poorly thought through proposal which will do nothing to 'stop puppy farming' and be a beaurocratic and administrative nightmare to implement.

For those people who's main aim in owning a pure bred dog is to breed and breed them to make money, the Government's further proposals and requirements to control their breeding activities, will just drive these puppy farmers further underground – they will not register their dogs with their Local Government and will not be on any system's radar.

For those dog owners who do not want to desex their dogs for all the solid reasons given above, and who have little desire to actually breed their dogs, the Government's proposal will actually encourage a whole number of them to do so, as they will have the stamp of 'Government approval'.

As ANKC registered breeders DogsWest members are required to meet the highest standards in housing, breeding and raising dogs, ensuring that we raise healthy, well adjusted pure-breed pups for a variety of purposes - as pets; as performance and working dogs; to maintain our breeds to be 'fit for purpose' and to protect them from extinction; and to enable the Western Australian dog-loving community to take part in our wonderful conformation and other dog sports.

These highest standards are strictly enforced through harsh penalties handed out to members who break the Code of Ethics and regulations concerning mandatory pre-mating health testing, breeding of bitches, raising of pups, and sale of pups, etc.

Our major concern is that the proposal will create a two class system of dog breeders in WA – one group who are 'government approved' breeders, and the other being ANKC registered breeders.

ANKC registered breeders have to meet the highest standards for breeding which in WA is closely monitored and administered by staff of DogsWest – probably about 2 employees to cover all 1700 DogsWest members.

We are very effectively self regulating because in terms of dog breeding, every puppy comes with its own unique pedigree, and this is only provided by DogsWest through a series of transactions and applications made by members to register each litter and each puppy, so every transaction is scrutinised to make sure that all DogsWest regulations and COE requirements are met, and only then is the pedigree issued and the onsale of each puppy to their new owner approved and expedited. No one can slip through the radar.

The Government is proposing a set of mandatory standards will be enacted for the welfare and breeding of dogs – but the draft of these has not been released and so we cannot comment

on them, and this consultation period will close BEFORE we can provide any comments on them.

Our Club is very concerned about the poor quality of the consultation that the Government is seeking from DogsWest members – how can the Government consider this so called consultation process is valid and ‘good practice’ if it is seeking comment on such an important aspect as ensuring the wellbeing and health of breeding bitches and their puppies, without the draft standards being available for us to comment on???

But what standards will be required to be met by those ‘government approved’ breeders? Will these standards be as high as the DogsWest strictly enforced standards?? And if not, why not??

And how exactly will the Government ensure their standards are enforced? And will the Government require that sufficient resources are provided, as DogsWest does, to ensure that every bitch bred and every puppy raised is well cared for and healthy, and not overbred?

Local Government is already financially stretched, and currently oversees the Dog Act through acting on complaints and tipoffs – not through proactive inspections, etc. Will Local Government or some nominated Government agency be required to undertake proactive inspections of ‘registered breeders’? or will it be on a ‘random selective audit basis? Or acting only on community ‘dob in’ or puppy -purchaser complaints?

We are not opposed to others breeding dogs in a caring, safe and appropriate environment on a small, hobby scale– DogsWest Members cannot meet the market demand to maintain dog ownership in Western Australia. In 2017 the Australian Dog Population was estimated at 4.8 million, which indicates due to mortality around 10% need to be replaced annually, or conservatively around 480,000 puppies per year. Perhaps around 40-50,000 pups are needed each year in WA, but DogsWest members only produced around 5500 pups in 2017, so the vast majority of pups required in WA each year, will have to come from breeders who are not DogsWest members.

We vehemently oppose any requirement for ANKC – registered Breeders and DogsWest Members to also be registered by their Local Government as Breeders simply because we do not want to sterilise our dogs.

This is double red tape, an administrative nightmare for the Local Government, more costs for no benefit, and we cannot see any useful purpose in this proposal. This will in fact see less dogs registered with local government and more backyard or black market operations that there already are. Whilst those that are and always have done the right thing will be penalised with additional fees and charges and open to a higher security risk for themselves and their animals from animal welfare activists.

We urge the State Government to EXEMPT DogsWest Members and ANKC Registered Breeders from the requirement of also being registered by their Local Government as registered breeders.

Giving an exemption to DogsWest Members and ANKC Registered Breeders will provide a clear point of difference between them and other Breeders ‘approved’ by and registered with their Local Government: we must meet the highest standards of welfare, to breed our dogs and raise pure breed puppies with a pedigree guaranteeing their lineage and breed with these Regulations and COE for breeding and selling puppies with an after sale service strictly enforced by DogsWest; while the Government’s ‘approved’ registered breeders will only be

required to meet (to date unknown) specified minimum standards for housing and selling their puppies – IF and only if these minimum standards are strictly and consistently enforced by the Government.

3. Government proposal - Transition pet shops to adoption centres sourcing dogs only from accredited rescue organizations and shelters

Our Club vehemently opposes the proposal to transition pet shops to adoption centres to sell rescue dogs and puppies. We strongly believe that pet shops should be legally barred from keeping and selling any puppies and dogs; and from acting as an intermediary in the sale and purchase of puppies and dogs.

Our wealth of experience in raising pups and rearing and socialising young dogs tells us that a shop is not a good environment in which to keep rescue dogs until they are sold; and is not a good environment in which to sell pups and young dogs. Our reasoning for this is that most puppies are being sourced from commercial producers and back yard breeders who are only after personal financial benefits and do nothing to ensure the betterment of any breed through even basic measures such as health checks or temperament testing prior to puppies being sold to shops.

ANKC Registered breeders generally have waiting lists for people wanting to purchase a puppy and contracts that require the return of the puppy to the breeder if no longer wanted to ensure the puppy is not on sold or given away by the purchaser.

Our members also provide puppy information packs that inform and educate purchasers to help ensure that puppies purchased do not end up abandoned or surrendered due to buyer ignorance about being a companion pet owner.

Our members also thoroughly vet and ‘interrogate’ potential purchasers of their pups long before pups leave the Breeder for their new homes; and if they are not happy about the circumstances of the potential purchasers or feel something is ‘not quite right’, then a pup won’t be sold to them.

However, retail shops selling pups will encourage and promote impulse buying of a cute pup or a sad looking rescue dog, etc. It is nonsense to suggest that potential purchasers will be adequately vetted and checked by the retailer to match the pup/dog to the purchaser. This in turn we think will lead to more pups/dogs being poorly managed and ending up in a dog rescue/shelter situation.

Transitioning pet shops to sell rescue dogs is a recipe for disaster in our view, and is a very poor and ineffective policy response to the Government’s stated aim of 'stop puppy farming'. Dogs which find themselves in a rescue or shelter facility have arrived there because of being neglected, abused, traumatised in some other way, lost, etc or because their loving owners can no longer care for them. All these dogs have and continue to experience extreme stress, anxiety with many also suffering ongoing medical problems.

It is nonsense to suggest that rehoming outcomes for rescue dogs and dogs in shelters will be improved by keeping them and selling them in shops, for the similar reasons given above. We are also highly concerned that those rescue/shelter dogs that have evident reactivity or underlying reactive tendencies because of their poor backgrounds, are at high risk of

becoming reactive to changed situations with their new owners, with potential for serious consequences, if not very carefully matched to suitable new owners and if not given ongoing support in the early 'settling in' phase in their new home environments.

We are also highly concerned that the Government's proposal will be very easily able to be circumvented or manipulated by unscrupulous persons –for example by persons establishing themselves as 'rescue' organisations, but merely being a front for the continued supply of pups and dogs for retail sale via pet shops.

Our Club feels that the easiest, most effective method to 'stop puppy farming' is to legally ban the sale of any dog through retail outlets, which will stop dogs being sourced from backyard breeders running in reality dog breeding businesses.

Our Club members are also aware that large numbers of puppies sourced from other States in Australia are regularly transported into Western Australia via road or air transport, specifically to be sold in retail pet shops.

Our Club strongly supports the Government legally banning the shipment of puppies and dogs into Western Australia on a commercial scale, as an effective means of 'stopping puppy farming'.

Our view is that the work already undertaken by the majority of existing dog rescue organizations and a breed specialist rescue service such as Bullmastiff Rescue Australia surpasses any 'shop front adoption / selling centre'; and existing rescues should remain directly responsible for the rehoming and placement of their dogs.

4. Government proposal - rescue services

Our Club feels very strongly that pure breed rescue organizations, run under the auspices of ANKC registered breeders and members of their State Canine control organizations (such as DogsWest, DogsVictoria, etc), should be automatically recognised by the State Government as an accredited breed rescue organization for that specific pure breed.

Bullmastiff Rescue Australia and its members have the knowledge, breed experience and ability to screen and place the right dog in the right home after a lengthy assessment of the dog and interview and screening process for new homes. We struggle to see how an individual without breed experience is able to ensure that this breed ends up in the right home and not as a pig hunting dog, which the fate of many bullmastiffs sourced from non ANKC registered breeders as it is a highly desirable dog for unscrupulous people due to its size and ability to work all day.

This service is provided free of charge for any purebred bullmastiffs who are unable to be returned to the breeder for various reasons. eg. where we are unable to establish the identity of the dog (no microchip and or registration papers), where the breeder is unable to accommodate the return of the dog(s), or where the breeder is unregistered ie not a member of DogsWest.

The Bullmastiff Club of Western Australia in conjunction with Bullmastiff Rescue Australia provides breed identification, shelter and food, veterinary care, spay / neutering, microchipping, temperament assessment and retraining as necessary prior to rehoming.

Bullmastiff Rescue Australia is incorporated under the Bullmastiff Club of South Australia and was established in 2007 in response to the rescue of an 8 year old bitch that had been dumped on the highway by what was then her fifth home. This grand old lady was the breeding result of a non ANKC breeder with no care or afterthought given once she had been on sold. She was adopted by a member of the state breed club and lived out the term of her natural life with every consideration to her health and welfare.

The aims / goals / mandate or ethos of Bullmastiff Rescue Australia is

- First and foremost Bullmastiff rescue is a service for the return of dogs that have been surrendered or abandoned or in any other way are found to be homeless, to their breeders (which also includes but is not limited to the owner of that dogs sire);
- To provide a pick up, hold, foster and adoption service for those dogs whose breeders are unable, unwilling or cannot be traced;
- To achieve the right to have Bullmastiffs released to breed rescue from the pounds and shelters across Australia providing a no kill safe haven through foster, boarding or whatever means necessary to give the dogs time to be rehomed;
- To provide appropriate vet care, behavioural training and back up for each dog to have the best chance of finding and keeping their new homes

We believe that every dog deserves a chance; however we will not release a dog for adoption into an unsuitable home, the dog's health and welfare will always come first.

Bullmastiff Rescue Australia and its state coordinators have developed and implemented an eight (8) step program that enable the volunteers to set each and every dog up for success and ensure that as a rescue organisation each rescue, surrender, rehome is carried out in exactly the same way each and every time.

Our Club is aware that many pitbull and pitbull crosses are registered with their local Government as 'bullmastiff crosses' in order to circumvent the requirements to keep known dangerous breeds. We are fed up with the number of dogs being registered as bullmastiffs or 'bullmastiff crosses', when they are clearly not bullmastiffs or bullmastiff crosses; and our members have provided a great deal of support to Local Government rangers to help them recognise the pure bullmastiff and to understand why cross bred dogs may be being inappropriately and incorrectly registered as 'bullmastiff crosses'.

As a result of our experience, our club strongly supports that all rescue dogs to be rehomed or fostered must have their DNA profile provided prior to leaving the rescue, so their exact parentage is known and advertised at the rescue organisation and must be provided to potential new owners/carers.

Furthermore it is essential that a collaborative approach be undertaken between rescue organisations and the local government facilities and refuge houses to ensure that breed specific rescues are acknowledged as being the most appropriate resources to undertake the care, assessment and rehoming of the purebred dog rather than the dog being housed under a non specific / generalist shelter service. There have been several cases

within the Perth region where Bullmastiff Rescue Australia have been contacted in relation to the purebred bullmastiff that has found itself in a pound situation, in these cases sadly we have been unable to assist the dog as the local government has an agreement in place with a non specific / generalist rescue or shelter and the dog has gone on to be sold to home that does not have breed experience or the right home life for this dog to thrive. Bullmastiff Rescue Australia does not feel the need to immediately place a dog but rather will wait for the appropriate home for the dog.

Conclusion

Our Club feels that the Government's aim of 'stopping puppy farming' is admirable, but we are however highly concerned that the Government's proposed policy and legislative responses will not and cannot meet its stated aim. We feel that the Government's proposals are poorly targeted, poorly thought through, poorly communicated, will be administratively very burdensome and will be an administrative nightmare to implement, with no hope of 'stopping puppy farming'.

The Government's proposals appear to be aimed at, and will capture, DogsWest Members who already do the right thing and fails to deal with the drivers of puppy farming in Western Australia.

In conclusion our Club restates our views about the Government's proposals:

Mandating desexing

We vehemently oppose the mandatory sterilization of our breed, and in fact of any breed, at any age, except where required for medical reasons because of the wealth of scientific evidence showing permanent desexing has adverse consequences for dogs.

We believe that education and incentives are the most effective approach to preventing indiscriminate breeding of dogs.

We agree wholeheartedly with the Government's Consultation Paper which states:
Your veterinarian is the best person to discuss the pros and cons of de-sexing your dog, the age the procedure is done, and determine the best strategy for your pet based on breed, lifestyle, longevity expectations, concurrent diseases, cancer risks, and other considerations for intact and de-sexed dogs.

We believe this commonsense and practical approach is the way to go in terms of the issue of desexing dogs, and state again that we are strongly opposed to mandatory desexing of dogs.

Requiring owners of entire dogs to be approved as Registered Breeders

Our Club is strongly opposed to the proposal that owners of undesexed dogs will be required to be approved by their local government as a 'registered breeder'.

We urge the State Government to EXEMPT DogsWest Members and ANKC Registered Breeders from the requirement of also being registered by their Local Government as registered breeders.

Transitioning pet shops as adoption centres for rescue dogs

Our Club vehemently opposes the proposal to transition pet shops to adoption centres to sell rescue dogs and puppies.

We strongly believe that pet shops should be legally barred from keeping and selling any puppies and dogs; and from acting as an intermediary in the sale and purchase of puppies and dogs.

Our Club feels that the easiest, most effective method to 'stop puppy farming' is to legally ban the sale of any dog through retail outlets, which will stop dogs being sourced from backyard breeders running in reality dog breeding businesses.

Our Club strongly supports the Government legally banning the shipment of puppies and dogs into Western Australia on a commercial scale, as an effective means of 'stopping puppy farming'.

Our view is that the work already undertaken by the majority of existing dog rescue organizations and a breed specialist rescue service such as Bullmastiff Rescue Australia surpasses any 'shop front adoption / selling centre'; and existing rescues should remain directly responsible for the rehoming and placement of their dogs.

Breed rescue

Our Club feels very strongly that pure breed rescue organizations, run under the auspices of ANKC registered breeders and members of their State Canine control organizations (such as DogsWest, DogsVictoria, etc), should be automatically recognised by the State Government as an accredited breed rescue organization for that specific pure breed.

Our club strongly supports the Government enacting a legally enforceable requirement that all rescue dogs to be rehomed or fostered must have their DNA profile undertaken prior to leaving the rescue, so their exact parentage is known and advertised at the rescue organisation and must be provided to potential new owners/carers.

Our Club urges the State Government to consider our submission and to proceed with its 'stop puppy farming' project in accordance with our Club's views and recommendations.

Please contact our Club if you require any further information or advice.

Yours Sincerely

Roni Oma
Secretary
26 July 2018