

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 type="checkbox"/> Mrs <input type="checkbox"/> Ms <input checked="" type="checkbox"/> Other <input type="checkbox"/> Enter title here.
First name:	Carolyn
Surname:	Starkey
Street or postal address:	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

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

Self funded rescue – West Coast Maremma Rescue

Transitioning Pet Shops to Adoption Centres

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

Allowing pet shops to sell rescue dogs is a good idea, but regulations need to be in place to ensure that dogs in a commercial environment are getting the needed physical exercise, mental stimulation, loving human interaction and positive training, required for their wellbeing.

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

Temperament, energy levels, breed specific health issues, training requirements, suitability to be with other dogs/pets

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

The main benefits will be the increase in the amount of rescue dogs being adopted and less impulse buying from the public with the reduction of puppies being offered for sale. My concern with selling rescue dogs from pet shops is that potential owners will not be screened for their suitability as owners and property checks will not be carried out.

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

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

This issue is complicated as de-sexing does prevent the risk of unethical and accidental pregnancies, however current research supports the importance of gonadal hormones on growth and health. Early age de-sexing, especially in large breed dogs, significantly increases the risk of joint disorders and cancers. Research studies also indicate bitches are more likely to become incontinent if spayed before their first heat, which could result in higher surrender/dump rate of affected dogs.

<https://www.ncbi.nlm.nih.gov/pubmed/11787155>

<https://www.ncbi.nlm.nih.gov/pubmed/23418479>

This raises an ethical dilemma to breeders, rescues and owners. Fortunately, there is an alternative to complete gonadectomy. Vasectomy and Ovary Sparing Spay render a dog sterile while preserving the gonadal hormones needed for optimum health during the growth stage. Removal of the gonads can then be done at maturity if desired.

<https://www.parsemus.org/projects/ovary-sparing-spay/>

<https://www.parsemus.org/projects/hormone-sparing-male-sterilization/>

The argument that early age de-sexing promotes better health and reduces undesirable behaviours is not supported by current scientific research. A more responsible and holistic approach to preventing pregnancies and the unethical breeding of dogs needs to be considered to prevent the negative impact of early age de-sexing,

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?

Dogs younger than 6 months of age for smaller breeds and large breed dogs under 9 months should not be de-sexed (total removal of gonads/ovaries), due to documented adverse health effects, but sterilized by vasectomy and ovary sparing spay to protect health.

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

Unless used for breeding by an ethical registered breeder or exempt on medical grounds. I will never rehome a dog without first sterilizing. It is my experience that people are still unaware of the grave consequences of breeding dogs, especially dogs of small gene pools, unknown lineage and without the necessary genetic health testing against disease common to the breed. The breeding of Maremma with poor and /or aggressive temperaments is also a huge issue as is the limited home environments suitable for Livestock Guardian Breeds.

Centralised Registration System

9. How will a centralised registration system benefit you?

As a rescue, I will be able to establish who bred a dog that comes into my care either as a rescue situation or a voluntary rehoming. It is necessary for a puppy's sire and dam to also be included to track parentage to prevent unethical breeding of closely related dogs. It will also expose inheritable genetic disease.

10. Do you think it is reasonable to increase dog registration fees for dogs that are not de-sexed to encourage de-sexing?

Yes

Unsure

No

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

Yes, although dog rescues should be exempt from the increased fees.

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?

Yes

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

A person registering as a breeder should be required to carry out genetic testing for simple inheritable genetic disease and results recorded on a register, similar to the UK Kennel Club Register <https://www.thekennelclub.org.uk/health/for-breeders/dna-testing-simple-inherited-disorders/>

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

Yes. Not every person that wants to breed dogs is responsible enough to ensure dogs are bred ethically. A breeder focused educational programme which includes breeder Ethics, and Acceptable Code of Conduct needs to be implemented and made compulsory prior to registration. Any breaches and breeder registration revoked immediately.

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

No, an independent entity free needs to be created to prevent any possible conflict of interest that could arise between a local shire and registered dog breeder.

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

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

Yes

Unsure

No

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

See question 14 above

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

Yes

Unsure

No

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

Definitely, however large commercial puppy breeding operations are unlikely to be able to meet the psychological, physical and social needs of breeding dogs. <https://www.sciencedirect.com/science/article/pii/S0168159111003005> Puppies born to bitches in commercial kennels are at a higher risk of behavioural problems. <https://www.sciencedirect.com/science/article/pii/S1558787817300102#bib62> Due to the above reasons, I do not support large commercial breeding operations for the above reasons

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:

A person with 4 or more breeding bitches and more than two males or 2 or more breeding bitches if not an ANKC member who competes in a ANKC dog sport

* 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: Carolyn Starkey - West

Date: 2nd August 2018

Coast Maremma Rescue

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

puppyfarming@dlqsc.wa.gov.au