

**Submission on Stop Puppy Farming**  
**by Gary Gleeson**

**Who am I?**

I am an ANKC Registered Breeder of Rottweilers and Miniature Pinschers and of course a member of Dogs West. I once had a kennel property in the Southern River Kennel Zone where I kept up to 16 dogs. These days I live in suburbia and have only one 6-year-old male Rottweiler as my personal working dog. As he is getting on (life expectancy 10 years, I will soon have to acquire another puppy to train as his replacement. He is perhaps the best known Rottweiler in Western Australia, "Ricky the Rugby Dog". He has his own Facebook page if you wish to know more.

I am a Committee Member of West Coast Dog Sports, a former Senior Instructor of the West Coast Rottweiler Club and a member and Instructor and / or former committee member of several other dog working and conformation clubs.

I specialise in rehabilitation of abused dogs. This is an extremely time intensive and costly process.

I am also a former WorkSafe Inspector and hold inter alia a Certificate IV in Government (Statutory Investigation and Enforcement). For many years I was WorkSafe's designated Inspector for any matter involving dogs at work.

I attended the consultation session at Dogs West on 12 June 2018 and have completed the online questionnaire as requested. However I was unable to include many of my concerns in that process so am also providing this direct submission.

**1. "Registered Breeder"**

The Discussion Paper proposes that anyone granted exemption from mandatory desexing will be become a "Registered Breeder". I have several concerns with this proposal.

First is the term itself. "Registered Breeder" is a term that is at present exclusively used to describe a person who is

- a. a member of the relevant Australian National Kennel Council Affiliate, in WA that being Dogs West;  
AND
- b. Has passed the requisite examination;  
AND
- c. Holds an ANKC Breeders Prefix;  
AND
- d. Agrees to breed only in accordance with the Dogs West Regulations and Code of Ethics.

Additionally as Rottweiler Breeder I am required to comply with the National Rottweiler Council (Australia)'s even stricter breed specific requirements.

To be approved for breeding a Rottweiler goes through the following process:

- a. After 12 months of age the dog's hips and elbows are x-rayed and evaluated by a veterinary orthopaedic specialist.
- b. The dog's mouth is examined to ensure that it has full, complete and correct dentition.
- c. The dog's eyes are examined by a veterinary ophthalmologist.
- d. The dog's DNA is tested for Juvenile Laryngeal Paralysis & Polyneuropathy (JLPP).

A failure in any of these tests results in the dog being eliminated from the breeding pool and usually sterilised.

Rottweilers that successfully pass through this intensive and very expensive health screening are then presented to an internationally recognised Rottweiler Breed Specialist at "Breed Survey". It is worth noting that this often takes place in the Eastern States and involves considerable expense for WA Breeders to participate in.

At Breed Survey the dog is thoroughly examined for "Conformation" (is it a Rottweiler of such outstanding merit that it should be bred from).

Then follows detailed "Character and Temperament Assessments".

Only after all of the above has been completed and the Breed Surveyor is satisfied that the dog is of such outstanding merit that it is suitable to perpetuate the breed is a pass certified and the dog is accepted as suitable to mate to other Rottweilers who have also been through this exhaustive process. My Ricky was nearly 4 years old when he finally completed this process.

Most breeds have a similar process.

The reason I have outlined this is to illustrate that there is much more to becoming a "Registered Breeder" than filling out a form. The proposal to label anyone who has an intact dog a "Registered Breeder" severely devalues the term and the investment of many thousands of dollars per dog ANKC Registered Breeder invest in producing a dog suitable for breeding.

I further am concerned that providing a piece of paper telling people that they are a "Registered Breeder" will encourage backyard breeding, the exact opposite of the intent of the "Stop Puppy Farming" process.

**RECOMMENDATION: I submit that the term "Registered Breeder" already has an explicit specific meaning and should not be used for any other purposes. The**

**proponents of this matters need to come up with an alternative descriptor for members of the public who have entire dogs they do not wish to desex.**

## **2. Transition Pet Shops to Adoption Centres (must source dogs from Rescues)**

No dog should ever be in a retail pet store. Impulse buying and the profit motive are simply too strong.

As noted above, I specialise in rehabilitation of abused dogs. I am concerned that many shelter dogs have wound up in the shelter because of behavioural and/or temperament issues. Who is going to ensure that adult dogs offered through pet shops are in fact suitable as companion animals and matched to the right owner? I fear that there will be very little if any screening of prospective owners in pet stores as happens now with puppies.

Most ANKC Breed Clubs run breed specific rescues. Most Breeders will actively participate in rehoming any dog they breed at any time in its life. My Contract of Sale include a clause that if at any time the purchaser wishes to dispose of the dog they will offer it back to me first. Unfortunately if the buyer surrenders it to a shelter I have no chance of retrieving the dog even if I somehow find out it's there.

I would like to see any legislation requiring that accredited shelters MUST take reasonable steps to notify the breeder of any dog that comes into their care and that they must surrender the dog to the breeder without charge if the breeder so requests.

Breed club based rescues will not be providing dogs to pet shops under any circumstances as this is explicitly forbidden by the DogsWest Code of Ethics.

## **3. Mandatory Sterilisation**

*"Above all do no harm".*

There is considerable evidence in the scientific literature and anecdotally in the dog world that early sterilisation is detrimental to the health of the dog.

There is also a growing body of evidence linking a number of health conditions to desexing.

The growth process is promoted, regulated and importantly stopped by hormones produced by the gonads.

The earliest possible time for sterilisation without disrupting the growth process is after the dog has reached full height and stopped growing. This varies from breed to breed.

I note that only South Australia and the ACT has mandatory desexing and that it is not supported by the Australian Veterinary Association.

#### **4. Unique Identifiers**

- a. All ANKC / DogsWest members have a unique 10 digit membership number. The first digit identifies the state the member resides in. All WA numbers commence with a "6".
- b. All ANKC Registered Breeders have a unique prefix. Mine is "Primarch". This is the first word in the registered name of any dogs I breed.
- c. All ANKC Registered Dogs have a unique 10 digit registration number AND unique registered name. Thus my current Rottweiler is:  
*Connalpie Alric Vintage Black (AI)*. His registration number is 3100028751. Together they show that he was bred in Victoria by "Connalpie Kennels". (AI) means he was conceived by Artificial Insemination (his father lives in Italy).

**RECOMMENDATION: Existing ANKC registration details should be used to identify DogsWest members and their dogs.**

**RECOMMENDATION: Non ANKC/DogsWest members should be given a distinctly different unique identifier that makes it clear that they are not ANKC "Registered Breeders".**

**RECOMMENDATION: Legislation should specify that accredited shelters MUST take reasonable steps to notify the breeder of any dog that comes into their care and that they must surrender the dog to the breeder without charge if the breeder so requests.**

#### **5. Introduction of Mandatory Standards for Dog Breeding, Housing, Husbandry, Transport and Sale.**

I support the basic concept of mandatory standards but have a number of concerns in relation to practical implementation.

##### **Breeding**

As acknowledged at the meeting I attended, DogsWest members are already regulated by a robust Code of Ethics which is enforced with severe penalties imposed on members who breach the Code.

In addition to the DogsWest requirements applying to all members, ANKC National Breed Councils and DogsWest affiliated Breed Clubs have breed specific Codes of Practice that impose additional breed specific requirements in areas such as appropriate breeding ages and required health screening tests.

I submit that the provisions in respect of Breeding should mirror DogsWest's Code of Ethics.

### **Housing**

I am unable to comment on specific proposals as DogsWest members (the experts) have not been consulted on this crucial area.

The housing requirements vary from breed to breed and a number of other variables. Some examples in my own dogs:

- My 50 kg Rottweilers require a lot more space than my 5 kg Miniature Pinschers. A kennel designed for a single Rottweiler will comfortably accommodate half a dozen Miniature Pinschers.
- My double coated Rottweilers are very cold tolerant but need cooling in summer.
- My single coated Miniature Pinschers are not worried by heat but very cold adverse.

### **Husbandry**

I am unable to comment on specific proposals as DogsWest members (the experts) have not been consulted on this crucial area.

Large scale commercial breeding establishments require dedicated whelping rooms. However like most DogsWest members, I whelp litters in the house.

### **Transport**

I am unable to comment on specific proposals as DogsWest members (the experts) have not been consulted on this crucial area. Nor as far as I can see have specialist pet transport companies or dog float manufacturers.

It is unacceptable that the experts in the field have not been consulted prior to production of a draft standard.

A list of organisations was read out at last night's meeting who form the "Writing Group" developing documentation for the keeping of dogs. The reaction in the meeting should have been enough to alert you that this was unacceptable to DogsWest members. In particular the apparent absence of anyone with practical hands on experience in housing and breeding dogs. There is however representation of organisations with dubious claims to expertise in these areas.

DogsWest members in particular object to any significant involvement by a rival private association, the RSPCA, in drafting documents that will dictate how our members conduct their affairs.

The RSPCA is NOT a government body. It is a private club that pursues a political agenda openly hostile to purebred dogs.

It is also a player in many areas of our industry in direct competition with DogsWest members. In particular it stands to benefit massively from the proposals to turn Pet shops into "Adoption Centres".

The RSPCA competes commercially with DogsWest members in providing a number of services such as training. It also runs its own retail pet supplies business "**World for Pets RSPCA Online Superstore**" with several large physical pet stores in the Eastern States. The web site describes the business thus:

*"World for Pets pet shop is Australia's largest pet superstore with over 17,000 items in stock today. Choose from the widest range of pet accessories like collars, leads, beds, toys, flea and tick protection, pet shampoo and pet toys. Whether you're looking for big pet brand names or new pet stuff and hi-tech gear for pets it's all in one location.*

*Thank you for supporting the work that RSPCA Australia does."*

See: <https://www.worldforpets.com.au>

Then Australian Veterinary Association represents a minority of veterinarians (around 25% I believe). In any case, vets are experts in sick animals not well ones.

**RECOMMENDATION: DogsWest be invited as a matter of urgency to nominate suitably experienced persons to the "Writing Group".**

## **6. Enforcement**

A fundamental principal of good government is that if the Parliament legislates any provision that requires enforcement the Government must ensure that the Department/s of State required to implement the legislation must be provided with the resources to fulfil the instructions of the Parliament.

Successful enforcement of legislation and prosecution are highly complicated activities that require highly trained expert staff. This is recognised by WA Labor State Platform that directs that "Ensure that a state Labor government adequately funds an independent and effective Animal Welfare Inspectorate; (Section 59 C of Animal Welfare, on page 50 of the Economics, Industry and Regional Development Chapter).

The best practice standard for field staff is at least the Certificate IV in Government (Statutory Investigation and Enforcement). This is the norm for "Inspectors" in many State Government agencies.

Few local governments have this expertise when it comes to dog housing and breeding. Many struggle with the basic responsibilities they have under the existing

Dog Act. Most Rangers are not dog experts, their experience limited to the most basic of interaction with dogs as an adjunct to their main duties in other fields.

Nor does the RSPCA. The 19<sup>th</sup> Century idea that enforcement of legislation can be handed over to a private club lacking resources, personnel and expertise is simply not appropriate in the 21<sup>st</sup> Century. Particularly when that private club is an active player in the industry that the Parliament has determined needs regulating.

**RECOMMENDATION: That a specialist investigation and enforcement unit with professionally trained field staff be located in the Department of Primary Industries and Regional Development.**

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