



All About Pups



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Stop Puppy Farming Consultation Paper
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Submission by All About Pups on the “Stop Puppy Farming” Consultation Paper

Introduction

I would like to express serious concerns with parts of the above-proposed legislation as it pertains to the sale of dogs in pet shops.

Background

All About Pups (formerly ACA Pups) has traded as a specialty puppy outlet since 2000 at the Innaloo Megacentre and more recently in Osborne Park since October 2016. In that time our philosophy has been to provide high quality, family-friendly puppies with exceptional care while with us and backup and veterinary care once they are in their new homes. Our focus is entirely on puppies – we do not currently sell any other pets. We derive 80% of our income from puppy sales, the rest from merchandise, food and grooming. In other words, our core business is selling puppies.

As the owner of this business and a veterinary surgeon of 35 years experience, operating small animal practices at Innaloo and Bentley, I feel I am uniquely placed to understand the challenges in both industries to meet optimum welfare objectives and strive to constantly improve these standards within the pet shop industry.

Summary of the pet shop puppy purchase experience:

- (a) These owners make very careful choices. These are not impulse purchases and certainly not gifts given by a friend or relative. Far too expensive for that! These are new members of their family and it is important the puppy they chose is of the correct breed, size, activity level and temperament as well as coat type and length. For some they must be low or non-shedding.
- (b) Though their choices are carefully considered, timing is critical as they often have a window of opportunity to be able to slot a new pet into their household. They will be unable to wait months or years for the right one to come along or it may not happen at all.
- (c) These are people that chose to rear a puppy from day 1 so they can shape their dog into a well balanced, socialised and well trained dog. They don't want to take on an adult dog with unknown issues that will rear their head in the future that escaped behavioural assessment at a shelter.
- (d) Purchasers have certain size or temperament requirements, especially if they will live with children or the elderly or live in a small residential property.

So the breed, age and history profile of a pet has a huge bearing on the suitability of a dog for a particular owner, as of course are the owner's own situation and abilities important.

Pups in our store are all vet-checked on arrival and treated for internal and external parasites and bathed. Any in-store illness is dealt with quickly and efficiently to minimise health issues on sale. In the event of any post-purchase illness we provide 14 day 24-hour veterinary cover. We also provide discounted puppy vaccinations and desexing. Puppy health and well being is our number one priority.

I will list below the issues I have with the proposed legislation as detailed in the paper:

1 Banning pet shops selling pups will not stop the operation of puppy farms

One of the biggest and most unsubstantiated claims made by the ALP to justify their planned legislation is buried in the section “Transitioning Pet Shops to Adoption Centres”. This is that the legislation, by banning pet shops selling pups, will “help break the puppy farm supply chain”. The inference here is that so called “puppy farms” owe their existence to pet shops which I strongly refute as a wide-sweeping generalisation.

All our pups are sourced from reputable breeders who are registered, or who are in the process of registering, with the Australian Association of Pet Dog Breeders (AAPDB), which have stringent requirements that are checked with annual inspections. We don't source from puppy farms.
Puppy farms (which are defined as any unregulated dog breeder including backyard breeders by the ALP) don't need pet

shops to sell pups, instead largely selling online.

The WA division of the Australian Veterinary Association (AVA) has stated in their “2017 WA State Election Platform” document that “The AVA does not oppose the sale of dogs (and cats) in pet shops provided they are sourced from responsible breeders who adhere to the mandatory standards” a condition I feel we meet.

2 Banning pet shops selling puppies will not significantly reduce the number of dogs in shelters in WA

There are no facts to back-up the assertion that pet shop puppies significantly contribute to the shelter dog problem. In fact the a quick perusal of www.petrescue.com.au (I strongly suggest you look here as it gives you the best insight on what dogs are in our shelters), where all WA shelter dogs are advertised, will show that there is scant evidence of breeds that pet shops sell in WA are up for adoption in dog shelters. That is Cavoodles, Spoodles, Pug crosses, etc. In fact I had a client who just purchased a puppy tell me recently she spent 6 months looking for a suitable small-breed puppy from a shelter in Perth and gave up. This is an all too-common story and the Labour Party has not provided any statistics to show breed profiles of dogs in shelters to indicate that they are of a type originating from pet shops. This is very likely because these statistics don't back up their claims.

3 Transitioning Pet Shops to Adoption Centres is not a viable solution for pet shops

The proposal that pet shops can transition to welfare pet adoption centres is a misguided and unworkable solution for many reasons:

- (a) At least 90% of shelter dogs advertised online at www.petrescue.com.au are medium to large dogs of working dog or bull Terrier, Mastiff, Shepherd etc crosses which may not suitable for the vast majority of largely suburban residents living in ever smaller blocks and town houses and apartments or with young children
- (b) Very few puppies are available through shelters. The vast majority are adult dogs.
- (c) Most pet shops are just that – shops. They are not facilities capable of housing large, noisy, adult dogs that have much larger space and exercise requirements than puppies. There is no sustainable business model that relies on selling a dog at a pet shop when housed at a shelter. Consumers would just go straight to a shelter or purchase from the shelter online.
- (d) Any small breed dogs of suitable type that is attractive to consumers are quickly snapped up at shelters so will not be available for pet shops to on-sell
- (e) There is no plan or structure in place to even allocate dogs from shelters to pet shops. They must negotiate their own contracts with the shelters. No business can survive without some guarantees of supplies of a satisfactory quantity and quantity. Why would pet shops be any more successful at selling shelter dogs than dog shelters already are?
- (f) Shelters operate as a charity and receive donations and grants to operate and have a tax-free status. These are not luxuries that will be afforded to pet shops that will be effectively operating in competition to shelters for the same pool of dogs.
- (g) There is no study that has been presented that shows that pet shops selling shelter dogs will result in any greater take-up of dogs into the community. The Labor Government is essentially telling consumers what you will be able to buy which is anti-competitive and discriminatory towards WA consumers as local registered breeders are not permitted to breed the cross-breeds such as Cavoodles, Spoodles, Labradoodles, Pugaliers etc that are some of the most popular breeds in WA. This legislation will force consumers to buy these breeds dogs from backyard breeders or online.
- (h) If the other elements of the ALP's legislation were effective then there should be an ever-dwindling supply of shelter dogs. While a fantastic result, it will mean that pet shops will also have an ever-dwindling supply of dogs to sell. A business cannot thrive or even survive on such a constrained supply.
- (i) To use an example in another industry, this ban would be the equivalent of banning all food outlets from selling meat because it was found there were a few producers that had poor welfare standards. Legislation is more appropriately directed at the source or regulating the retailer to ensure a good item is sold. Banning is an extreme measure when regulation hasn't even been attempted and will be ineffective when alternate supplies are sourced.

In summary, transitioning pet shops to adoption centres is not a viable and sustainable business model for those dedicated to puppy sales and the ALP's model of limited, dwindling and controlled supply guarantees that they will eventually have to close down.

4 Unintended market manipulation a likely effect of legislation

The legislation will severely restrict the availability of the most popular dog in WA – the “Designer Hybrid”. Market forces will very likely see puppy prices soar for these dogs meaning that ownership of these family-friendly breeds will not be affordable for many. This is because Dogs West, the governing body for registered breeders in WA bans them from cross-breeding, unlike in most other states so currently the only source of these types of dogs in WA is from pet shops importing them from breeders in the eastern states or from backyard breeders.

Owners wish to purchase these very popular, so-called designer hybrids, because they meet their special requirements that the individual pure breeds may not. This is by virtue of gaining traits from two different breeds as well as benefiting from through the scientifically proven phenomenon of hybrid vigour. This blending of size, temperament and coat traits from both parents is mostly used to produce an ideal family pet that maybe the individual pure breeds don't necessarily fulfil.

What does this mean to future WA consumers that wish to purchase a Cavoodle or Spoodle or Pugalier if this legislation is enacted? They will need to either purchase them online from interstate where there may, or may not be, breeder controls or buy from a local backyard breeder. Because demand will likely far exceed supply (as is already being found in other states) prices will soon double and triple making it even more enticing for unscrupulous breeders to enter the market. Cavoodles now sell for over \$8,000 in Victoria which is double the price before their own legislation came into force.

WA has a comparatively small purebred dog breeding industry, which will struggle to meet the demand for selected purebred dogs if consumers switch their attention to purchasing these. Prospective purchasers already have to wait extended periods of up to years to obtain the puppy of their choice and the availability and price equation will make purchasing through this avenue ever more difficult.

Dog ownership will become the province of the rich. Many people will just opt out and feel that it is just too hard to get the dog of their choice. Forcing people to buy a shelter dog, while admirable, is not going to solve the problem of dogs in shelters. You can't make people buy an orange if they want a banana. There are also not enough shelter dogs available that meet prospective pet owner's specific requirements.

The banning of the sale of pups in pet shops is counterproductive as

- (a) It will disadvantage consumers in WA by making it more difficult and more expensive to source the dogs of their choice.
- (b) It will force consumers to seek out pups from online sellers from interstate who are difficult if not impossible to regulate against by the local government
- (c) The demand-supply equation will move to encourage the puppy breeding to go underground with car-park sale of pups (which are already common) becoming widespread when puppy prices are likely to rapidly nudge towards \$10,000 each. This will be difficult, if not impossible to police, as the purchaser doesn't know the name or address of the breeder.
- (d) Pet shops are a bricks and mortar business. They are much easier to regulate and monitor and this should be the focus of the government, not a ban.

Our position is that the sale of pups in pet shops should be regulated. Banning is not a solution to the presence of puppy farms or dogs in shelters.

5 Online puppy sales will not be policed

The paper plans to introduce a "targeted education campaign" to dissuade consumers from purchasing pups online. This hardly seems an effective way to control what is probably currently the major avenue for unscrupulous breeders to sell their pups. The proposed legislation offers no concrete ways to address or police this issue.

The paper's proposals, I consider, do not properly address online puppy sales as they are likely to be the main avenue sustaining the future development of unregulated dog breeding as in so-called "puppy farms".

6 Cost of regulation and difficulty in enforcing planned legislation

I estimate that to replace the current supply of pups sold in pet shops in WA there will need to be around 1,000 backyard breeding dogs. As most will likely have only 1 or 2 breeding dogs at most, this equates to a massive undertaking by council rangers that will be tasked with assessing that breeders meet the welfare standards required of their registration. The cost of policing these regulations will be large and ongoing if it is to be effective. The effectiveness of legislation is only as good as it's policing.

If the example of the implementation of the "Dangerous Dog Act" is anything to go by, the legislation will not have the intended effect due to poor policing of many elements. Many flout the legislation by re-badging their Pit Bull Terriers as American Staffordshire Bull Terriers etc with rangers powerless to refute this. The Cat Act has met a similar fate with very little policing of the legislation taking place. Below are comments from a local welfare organisation about the implementation of the Cat Act:

http://savingpets.com.au/blog/wa_cat_act_year_three

*SAFE Perth (President Sue Campbell) - "In our experience it is not getting any better."
"I only know of one council that is actually following up on people that are still giving away or selling kittens or cats without de-sexing or microchipping them. Some Shire rangers still shot cats rather than taking them to vets for a lethal injection."*

7 No consultation with pet shops

The Government states a commitment to consult with all stake holders yet has failed to give pet shops the chance to have an input in this consultation process up to this time. We feel this is a grave omission to any true, fair and transparent process considering we have the most to lose if this legislation was implemented.

8 Enforced desexing of non-breeding dogs/Registration of breeding dogs will not diminish backyard breeding

Enforcing the desexing of dogs will have the biggest impact on the number of dogs in shelters as it is indiscriminate breeding by the backyard breeders that most significantly contributes to the number of unwanted dogs.

I predict that it will have little effect on the backyard breeding of dogs for profit. In fact, I predict an explosion of breeders filling the void left by the pet shop industry as demand forces prices up. Unless there is an active and diligent policing of backyard breeders I think it's unlikely it will not stop those determined backyard breeders wishing to cash in on the booming prices in designer hybrids brought about by the full implementation of this legislation. As seen already with the Cat Act and the Dangerous Dog Act, unless there is policing of regulations, people will continue to flaunt the rules.

Proposals for changes to the proposed legislation

I propose that the legislation be amended to introduce regulations (similar to attached NSW regulations) to control the pet shop industry with a phasing in period of say 5 years to establish and implement these changes. This code for the operation of pet shops will establish clear guidelines to adhere to. This will form an orderly path towards the intended objectives in an effective manner, which will enable all parties to be satisfied.

Conclusion

In summary, I am all for the established of enforceable guidelines for the conduct of pet shops in WA. I am against the banning of the sale of puppies or other pets in pet shops and see this as a retrograde step that will produce little in the way of the stated objectives of stopping puppy farms or reducing the number of shelter dogs. I am for the establishment on stricter controls on breeding and enforcing desexing of all non-breeding dogs though I see serious problems in the enforcing of these rules to quell unregulated breeding once pet shops leave the market. I don't see the sale of shelter dogs in pet shops as feasible or a viable business model and feel that we should let shelters do what they do best and continue to provide their re-homing services. In the event that this legislation was passed in full, we will be forced to close our operations and this will not only be a loss to those 5 staff employed but also to future pet owners. These future pet owners may then have to go through other less easily regulated avenues to find the dog of their choice as a result of the full implementation of this proposed legislation.

I ask for the ban on puppy sales to pet shops to be dropped from the proposed legislation. Instead there should be the installation of pet shop regulations after proper consultation with the industry within WA and a reasonable transitional period to allow pet shops to implement these regulations.

Paul Kluck BVMS

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