



Director, Animal Welfare
Department of Local Government, Sport and Cultural Industries WA
(by email)

Dear Sir/Madam,

RE: 'STOP PUPPY FARMING' PUBLIC CONSULTATION

Perhaps WA will slavishly copy the Victorian "puppy farming" legislation and therefore consultation is simply to tick boxes, but perhaps there is the possibility of real consultation. In hope of the latter, please accept the following in good faith.

Victorian "puppy farm" legislation, based on banning pets in pet shops (which has NOTHING to do with "puppy farming") and closing commercial breeders, has been a sad failure with animal welfare the worse for it. In the year since enactment:

1. Pet shops with immaculate standards, inspection and record keeping have closed in favour of backyard breeders churning out pups in filthy conditions and selling on the internet with fake breeder numbers for excellent profit.
2. Pet prices have climbed so high that the average working family can no longer afford the right dog for their family, worsening the national dog shortage considerably
3. Puppy sales are being completed in Bunnings and MacDonaldis car parks
4. 8 week old puppies are being shipped from interstate or trucked from other states from unknown sources.
5. Inspected, high quality breeders are closing and get-rich-quick backyard breeders advertising anything and everything online and numbers are increasing rapidly
6. *Not one* pound or shelter has supplied a pet shop with dogs or puppies for sale.

There is clear evidence of a national pet dog shortage and it is worst in WA. At any moment, the ratio of "looking for dog" to "dog to sell" advertisements in WA is around 3:1 and it is worsening (snapshot, Gumtree, 20 March 2018). Nationally, per capita dog ownership is rapidly falling as well as falling in total, with WA worst affected. RSPCA euthanasia rates have effectively hit zero (national 1800 dog euthanased total for F/Y 16/17 and 85% of these for medical or behavioural reasons from a total of 4.8M dogs = 0.006%) (RSPCA, ABS, AHA National Statistics). The "Cavoodle Index" has risen in 12 months from \$2,800 to average \$4,900, with top price \$8,500 in Melbourne Nov 2017. We are aware of a number of pounds and shelters in Vic advertising rehoming dogs and then refusing to sell them as that would leave their available dogs at zero. *Active* purebred Kennel Club breeder numbers have been falling for 20 years. In Vic only 1500 breeders registered a litter last year and that number is far less in WA.

WA *families* are particularly hard hit, particularly because there has been no organised hybrid breeding in WA. There is no question that hybrids are on average genetically fitter than purebreds, and the breeds chosen for hybridisation are more suitable for families than the mastiff/Bull Arab and other such crosses seen in pounds/shelters in WA.

A "puppy farm" is defined by the RSPCA as a breeder who does not meet the needs of the animal. This definition is NOT based on size, staffing, of breed type and does not include pet shops. Victorian activists





brought forward their legislation not for animal reasons, but to stop pet ownership. Politicians voted for it to stop stories in the media. Animal welfare is worse as a result.

To successfully stop “puppy farming” in WA the following is required:

1. A legislated, objective based Breeder Code of Practice setting minimum standards based on animal outcomes; not on unsuitable proxies such as animal numbers or staff ratios. The NSW (and until recently Vic) Codes have been demonstrated to work.
2. A legislated, objective based Pet Shop Code of Practice setting minimum standards including their breeder relationships and allowing for a contiguous and inspected/enforced supply chain. The NSW (and until recently, Vic) codes have been demonstrated to be highly effective
3. Breeder registration including veterinary audit against the Code independent of breeder bodies. Breeder bodies do not allow hybrid registration and work for *breed* standards, NOT *breeder* standards. This would exist only to identify breeders and would include all breeders including those that produce “accidental” litters, at minimal cost. We are happy to assist with a draft model.
4. Self-funded enforcement with truly significant financial penalties and gaol terms that truly discourage poor quality breeders and make the objective – animal welfare – truly clear.
5. Minimal cost imposition on good breeders/shops/owners while catching those who choose not to obey. Annual registration encourages civil disobedience and cannot be enforced.
6. Use of positive reinforcement to drive cultural change. (Seems we worked out that this works on dog training, but ignore it for people?). *Mandatory* desexing and *Bans* on pets in pet shops drive things underground. Positive cultural messages work.

We have no doubt that your public consultation will be flooded with hundreds of documents from activists and alleging a relationship between pet shops and poor breeding (there is none), that “dogs belong in homes not farms” (actually, dogs belong in packs, not with humans) and asserting that somehow selling purebreds from a registered breeder for \$5,000 is somehow not “commercial”. All are misrepresentations with a second agenda. We invite you to visit our members in WA to see for yourself that these hackneyed assertions are simply not grounded in fact.

We would be more than happy to meet with you, with our WA members present, to discuss a program that will genuinely and measurably improve animal welfare in WA and *genuinely* stop “puppy farming”.

Yours Faithfully

(by email)

Joanne Sillince BVSc(Hons) MBA FAICD
Managing Director.

