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Stop Puppy Farming
Department of Local Government, Sport and Cultural Industries
PO Box 8349
Perth Business Centre
Western Australia 6849

**SUBMISSION BY THE W.A. CHIHUAHUA CLUB INC.
STOP PUPPY FARMING PROJECT**

Our objection

The WA Chihuahua Club Inc. wishes to record its objection to the State Government's proposed legislation because it will adversely affect Dogs West breeders who breed only 15% (www.ankc.org.au) of the annual demand for dogs.

The demand for pet dogs is now more for smaller dogs such as chihuahuas which fit current living conditions. Smaller breeds have small litters, say, 1-4 pups, compared with larger breeds which have litters of, say, 10-14 pups.

Chihuahua breeders in W.A. are already unable to accommodate the requests to purchase a puppy or even an older dog and will be adversely impacted by this proposed legislation. Intending purchasers will be forced to seek dogs from puppy farmers and backyard breeders, thus not decreasing their operations but, in fact, increasing their business.

The data (ibid) below show that in 2017, only 1,353 chihuahuas were registered Australia-wide. That figure is consistent across the years shown.

AUSTRALIAN NATIONAL KENNEL COUNCIL LIMITED
NATIONAL ANIMAL REGISTRATION ANALYSIS
2010-2019

GROUP 1 TOYS	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Affenpinscher	17	33	28	51	30	27	25	32		
Australian Silky Terrier	273	277	253	237	199	202	134	197		
Bichon Frise	445	412	445	366	471	465	465	420		
Cavalier King Charles Spaniel	2942	2794	2655	2531	2615	2439	2555	2491		
Chihuahua (Long)	690	697	581	565	563	545	520	619		
Chihuahua (Smooth)	778	812	724	713	735	789	771	734		
Chinese Crested Dog	286	248	266	216	221	234	207	197		
Coton De Tulear	0	0	0	0	0	0	2	8		
English Toy Terrier (Black & Tan)	72	61	54	92	58	63	75	65		
Griffon Bruxellois	199	149	166	195	126	166	209	137		
Havanese	158	197	263	320	340	375	415	374		
Italian Greyhound	400	377	342	354	530	521	486	607		
Japanese Chin	66	43	55	61	45	50	53	40		
King Charles Spaniel	29	11	27	29	24	47	25	33		
Lowchen	53	44	67	84	76	59	60	67		
Maltese	315	299	305	296	234	196	185	243		
Miniature Pinscher	209	217	179	227	211	230	195	204		
Papillon	420	415	388	366	386	387	420	402		
Pekingese	186	161	153	172	196	160	173	124		
Pomeranian	561	506	468	410	428	470	471	490		
Pug	1495	1338	1356	1319	1311	1428	1378	1506		
Russian Toy	0	0	3	23	37	22	32	15		
Tibetan Spaniel	303	210	261	194	220	226	183	171		
Yorkshire Terrier	237	253	168	234	188	201	227	208		
TOTAL	10134	9554	9207	9055	9244	9302	9266	9384	0	0

Our Club

The W.A. Chihuahua Club Inc. was established in 1969 to conduct various social events. In 1980, the Club was incorporated and granted affiliation with the Canine Association of Western Australia (Inc.), trading as Dogs West.

The Club holds chihuahua shows in April and September, and a fun day in June at the Dogs West grounds in Southern River. These shows provide an opportunity for enthusiasts and intending purchasers to see chihuahuas and to meet breeders. The Club will also be conducting the 2020 Chihuahua National Specialty Championship Show which will be judged by an overseas judge and attended by interstate exhibitors.

The Club has 65 members.

The chihuahua is one of the most ancient breeds of dogs with the mummified remains of one found in an Egyptian tomb. Thus, the chihuahua can be said to be at least 3,000 years old. Chihuahuas were first imported into Australia in 1955.

The purposes of the Club are :

- To foster interest in the purebred chihuahua.
- To encourage, assist and instruct members in matters concerning the showing of their dogs.

- To conduct exhibitions.
- To promote good fellowship and sportsmanship among members and those participating in the Club activities or attending fixtures.
- To inform members of and make known to them the laws and regulations in Western Australia relevant to the ownership of dogs and their care.
- To carry out activities to encourage the training and general upkeep of chihuahuas.

Our Club members request that puppy purchasers contact them first should a situation arise where they can no longer retain ownership. Volunteers assist in the rehoming of chihuahuas.

Our breeders are members of Dogs West and must register all progeny whether pets or kept for showing and breeding. They must provide comprehensive information to each puppy buyer for the care, welfare, housing, training and socialisation of every puppy sold. It is compulsory that every puppy be microchipped prior to going to its new home. The breeder is also responsible for the transfer of the microchip into the new owner's name.

Mandatory desexing

We vehemently oppose the mandatory sterilisation of our breed, in fact, any breed at any age except where necessary for medical reasons. This is because of the wealth of scientific evidence which shows permanent desexing has adverse consequences for dogs including :

- a) A reduced lifespan. 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) An increased risk of cancer particularly in bitches. The Government states that permanent desexing will improve the health of dogs but this claim also is not supported by the scientific evidence.
- c) 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 permanently desexed at a young age are likely to develop increased fear aggression and anxiety later in life increasing the risk that they will become unmanageable as family pets and be dumped in rescues and/or euthanised.

Certain medical conditions in the dog only develop or become apparent with age and mandatory desexing will remove from the gene pool healthy dogs free of such

conditions. This is disastrous for our ANKC registered breeders' ongoing pursuit of the eradication of such medical conditions by 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 many members do not want to desex their bitches once they are no longer being bred and shown.

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

We are aware that there are various non-surgical methods of temporarily or permanently sterilising dogs but these are not as yet fully tested to ensure they are effective and that there are no downsides.

Conformation showing is principally based on exhibiting entire dogs and bitches from young pups through to fully mature adults and veterans. Mandatory desexing will destroy our sport in Western Australia and throughout Australia.

The purebred chihuahua is the product of generations of selective breeding to produce a dog or bitch suited for the specific purpose of living with its human family. People prefer a purebred chihuahua because of its consistent temperament, character, function, size and conformation. In a state such as Western Australia, mandatory desexing will result in far fewer purebred chihuahuas being available which we feel is to the detriment of the dog-loving community.

Some of our members already have in place contracts requiring the sterilisation of dogs sold as pets at an appropriate age. They might offer incentives such as monetary reimbursement.

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 appropriate in terms of the issue of desexing dogs and state again that we are strongly opposed to the mandatory desexing of dogs.

Mandatory desexing – breeder terms

Dogs held on breeder terms from a Dogs West breeder should be exempt from mandatory desexing – they are part of the wider Dogs West community of dogs and could be crucial to maintaining the gene pool for the breeding of healthy purebred dogs.

Many dogs live full and happy lives as companion animals in a loving home and are occasionally used by their ANKC registered breeder in their breeding program. They should be exempt.

Restrictions under the WA Dog Act make it very difficult for many Dogs West breeders to maintain a breeding program without the ability to have dogs in their wider community.

Some dogs are also shown from that wider community with the dog living in a companion home but shown by the breeder of the dog. They must be exempt.

Registering owners of entire dogs as ‘registered breeders’ with their local government

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

Dogs West has set a very high standard when it comes to the breeding of purebred dogs – and we must be on the Dogs West/ANKC register. We are held accountable for our actions.

We vehemently oppose any requirement for ANKC registered breeders and Dogs West members to also be registered by their local government as breeders simply because we do not want to sterilise our dogs. We do not need to be on another register.

This is double red tape, an administrative nightmare for local government with more costs for no benefit.

We urge the State Government to EXEMPT Dogs West members and ANKC registered breeders from any requirement to also be registered by their local government as registered breeders.

Giving an exemption to Dogs West 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 raise purebred puppies with a pedigree guaranteeing their lineage and breed within the Dogs West Regulations and Code of Ethics. Local government ‘approved’ registered breeders will only be required to meet (not yet known) specified minimum standards for housing and selling their puppies – IF and only if these minimum standards are strictly and consistently enforced by government.

Transition pet shops to adoption centres sourcing dogs only from accredited rescue organisations and shelters

We vehemently oppose 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 socialising young dogs tells us that a shop is not a good environment in which to keep them and is not a good environment from which to sell pups and young dogs. Our reasoning for this is that most puppies are being sourced from commercial producers and backyard 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 which 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 provide puppy information packs which 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 interview potential purchasers of their pups long before pups leave the breeder for their new homes. If they are not happy about the circumstances of the potential purchasers, then a pup will not be sold to them.

Retail shops selling pups, however, encourage and promote impulse buying of a cute pup or a sad looking rescue dog. It is a 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 will lead to more pups/dogs being poorly raised and ending up in a dog rescue/shelter situation.

Transitioning pet shops to sell only rescue dogs is a recipe for disaster in our view. 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 owners can no longer care for them. All these dogs have and continue to experience extreme stress and anxiety with many also suffering ongoing medical problems.

It is a 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 reasons given above. We are also concerned that those rescue/shelter dogs which have evident aggression or underlying aggressive tendencies because of their poor backgrounds are at high risk of becoming aggressive to their new owners with potentially fatal consequences.

Breed rescue services

Members and Clubs who run breed specific rescues must abide by Dogs West Rules and Regulations which means they are not permitted to supply any dog, for any reason, to a pet shop.

Some rescues have waiting lists of people who are looking for an older or second dog.

If they wish to rehome dogs they have bred or assist other breeders or the breed in general, they should be exempt from accreditation by the Government.

In closing, The WA Chihuahua Club Inc. earnestly entreats the State Government to exempt Dogs West members from the proposed legislation. There is already a shortage of purebred dogs in general and chihuahuas in particular. This shortage would be exacerbated by Dogs West breeders being required to comply with the proposed legislation.

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Carol King
Hon. Secretary