

# STOP PUPPY FARMING

## Public Submission Form

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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](mailto: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:	<b>Ms</b>
First name:	Wendy
Surname:	Roberts
Street or postal address:	████████████████████
Telephone (business):	██████████
Mobile telephone:	██████████
Email address:	████████████████████████████████████████

## Stop Puppy Farming Questions

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1. Please indicate if you are any of the following:

- Dog Owner ☐
- Shelter organisation employee ☐
- Shelter organisation volunteer ☐
- Rescue group volunteer ☐
- Foster Carer ☐
- Other – please specify below ☐

**Caring for community dogs while they are in town,  
recovering from having pups and after, recovering from  
desexing, before going back to community.**

**Also care for Domestic Violence victims dogs when asked.**

## Transitioning Pet Shops to Adoption Centres

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

It would depend on the reputation and success rate of the assessing process, and personal success rates of the assessing individual. Having assessed many dogs myself and observed others conducting assessments, I know the process is not as easy as it seems, particularly when animals are in a pound or shelter environment. Kennel guarding, protective behaviour, resource guarding, fear biting, fear aggression, escalating anxiety and it's affect on mouthing, etc etc. A seemingly friendly dog, desperate to connect to alleviate it's distress from being in an austere, unfamiliar environment, can be different in a home, when the new adopting humans have no idea about observing, and training, a dog with pre-determined life experiences.

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

As much it known, even if negative. While Shire may not allow sharing of address and old owner (if any) information, knowing if it was a 'street kid' is important. Same as barking history, jumping, digging out, any kind of aggression and to what species or demographic.

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

Yes, if they can reliably have support/backup if an adoption doesn't go well and people need to return the animal. The outlet must have the ability if someone walks in the store, saying "here, we adopted it last week/month/year and it's not working out", they hand over a lead and walk out the door.

5. If you are a pet shop owner or operator, what impact will this have on your business?

Not applicable

## **Mandatory dog de-sexing for non-breeding dogs**

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

Very strongly towards it. Insufficient interest, funding and service provision exists further north in the state. Vet services/costs are prohibitive to people embracing desexing readily, many vets charging by weight, and discourage desexing until a minimum of 6 months, 9 months for larger breeds. Poor and inconsistent Shire subsidies to assist affordability are often difficult to negotiate. Funded, Indigenous corporations to service dog health programs are not sufficient to encompass all the dogs in the region, as there is not concept of how many dogs there are in the outlying communities, not well covered (if at all) by Shire jurisdiction.

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?

There needs to be clarification as to what registered breeder means, just one dog at home in suburbia or a big semi-rural property, breeding on a larger scale. Breeders should be required to limit litters per bitch and then mandatory desex then occurs. There should be a limit of breeding males registered at any one property. Medical/age limitations, ratified by a vet would cover metropolitan/known dogs, however unless significant changes occur, these changes are going to be limited in success, as noted above, dog numbers are underestimated in more secluded regions on the state.

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

Immediate start, from when legislation is passed, with pups just born having a 6 month due date . Even if you do a grace period to give people time to save, but really a state wide free desexing drive should occur just prior, to assist low socio-economic, and also more funding should go out to assist community desexing, like Murdoch vet teams do with various organisations.

## Centralised Registration System

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9. How will a centralised registration system benefit you?

Make it easier to locate owners and make them more accountable, therefore eventually less dogs, and less need for shelters and rescues to have to juggle so many dogs at once. Same should be occurring for cats though.

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

Unsure: Metro this might work, and in well established/resourced Shires. Up north, anywhere remote, this will simply make people avoid admitting they own a dog, saying roaming dogs are someone else's to avoid being held accountable. Unless the State Government is going to throw much more money at this problem, you will 'tidy' up some areas, and continue to have breeding on communities and outlying towns. Don't think anyone has any real idea of how many dogs there are not registered/chipped, hence you don't know how big the problem is. This question is based on the dogs you expect to know about, but for every one of 'these' dogs, there would be probably 10,20 dogs NOT known about.

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

You will have to fund it some way, but once again, you are looking at sticking the knife in the 'known' and compliant dog owners.....it's the 'unspoken for' dogs, and the 'spoken for' dogs people won't spend money on registration. Free chipping is embraced, so you could only track the dogs through the chips, and hoping pass that information to relevant shires. By the time this would be done, dogs usually deceased or moved on to other communities, towns, or homes.

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, they need to pay annually to be registered breeders. Humans apply for breeder registration, and each dog has a special registration, identifying them as having a term of 'breeding life'. This is to particularly protect the bitches from mammary cancer and other reproductive issues.

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

Registered breeders also need to pay tax based on their puppy sales earnings!! They must also be personally and financially responsible for ensuring each pup they sell is desexed. As per above....Humans apply for breeder registration, and each dog has a special registration, identifying them as having a term of 'breeding life'. This is to particularly protect the bitches from mammary cancer and other reproductive issues.

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

People not registered with the ATO, with Abuse (animal or human) convictions or significant history of charges being laid, even if never convicted. History of animals abuse or non-compliance with RSPCA (in any state) or history of non-compliance with either RSPCA or Shire Local laws regarding noise complaints, abuse, welfare concerns, containment or facility hygiene/space/housing condition issues

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

Certainly not with remote/regional area Shires: they simply aren't capable and often have no interest in animal management – they stop picking up dogs unless a report of public safety, due conducting fire break inspections, or other yearly matters they need to deal with. Things happen every year, at same times of each year, depending on what the issues are. Some Shires can't show records of proper kennelling costs, like food, as they don't want to have to feed a dog for 3 days if they found it unchipped and roaming – much easier to PTS day 1 as who will audit to see if it was kept 1 or 3 days before being shot (yes- remote shires shoot, so don't have vet euthanasia records to support their pound management). Audits of pound figures in regional shires would likely show these irregularities- but who's got the time and funding for that. State Government/WALGA would be expected to provide many Shires with funding, to be able to logistically cover the extra workload. In Metro, some shire's would be able to do no problem, but others won't be interested/will struggle with resourcing. Personal friendship or prejudices towards people in the shire could be influencing decisions made, as to whether breeding registrations are authorised or not. I would suggest a different body, perhaps new, perhaps an expansion of something already in place. Shires exist in every town so this would be easier option, but realistically Department of Commerce would be best, if you have to look for a responsible body. If funds earned by breeding is reported to ATO, then Commerce ideal. They would have to find a way of 'manning' it, which could be through contracting Shires, Indigenous land Rangers or other bodies with dog health programs, perhaps local vets, rescues, but ultimately the data needs to be managed by one state body, and I doubt WALGA is the way to go. Even if Commerce covers the registrations for working dog breeders, who just want to keep their working dog blood lines going, it still makes sense to keep it all together under one department.



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

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

Yes – needs to be based on number and size/breed of animals being breed. Space for Mastiff or kelpies (high energy) for example, would need a much larger amount of cubic space per animal than compared to say chi's. Prisons are expected to provide minimum standards, so same should be considered here. Temperature controlled if required (hot conditions in summer/wet or colder months) and proof of maintaining that standard.

Also, only 1 property per registration. That way qualitycontrol can occur more easily than 4 facilities listed on 1 registration, and only 1 of 4 gets audited yearly, and that's the compliant one in humane conditions.

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

People not registered with the ATO, with Abuse (animal or human) convictions or significant history of charges being laid, even if never convicted. History of animals abuse or non-compliance with RSPCA (in any state) or history of non-compliance with either RSPCA or Shire Local laws regarding noise complaints, abuse, welfare concerns, containment or facility hygiene/space/housing condition issues

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

Yes, absolutely. If anyone cares about the welfare of the animal, as well as its 'commercial viability', then this is a must.

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

Yes, whether breeding working dogs, or commercial puppy sales to mainstream home owners, should be the same standards dog are bred and raised in.

In breeding then becomes an issue, so that would need clear rulings on how much inbreeding within 1 breeding facility/registration.

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:

Keeping a defined number of breeding dogs, as said before, depends on space and suitability for breed.

Breeder must be able to show financial stability to maintain the business (as that is what it is) and not be reliant to sell a pup to afford food for the next litter.

Worming, FULL vaccinations must be minimum requirements, as well as any x-rays or medical records to support health of animal from birth to sale.

Must show ability or plan to accept back dogs returned if temperament not suited.

Must ensure desexing of each animal is followed through, without question. If this is not done, then records of person sold to must be supplied to Department responsible for managing all registered breeders, as the new owner must then apply for breeder registration, or show vet records to support why it can't reasonably be desexed.

There also needs a defined consideration as to when a puppy is considered old enough to 'sell'. Some are happened over barely weaned, or weaned very young. Is this in the pups best interests? Is there evidence that could be collated as to whether people would pay more to get one younger? If so, is this right?

This issue is beyond Puppy Farming, it now also has to cover backyard breeding, which we see on Facebook, Gumtree, other forms of media, as people, 'earn an income' from their 'family pet (for it's life or just a few litters as it's good for the kids to experience it/makes a better temperament dog, etc.).

\* 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:      No

Signature: W.Roberts

Date: 3/8/18

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## **Please return this form to:**

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**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@dlgsc.wa.gov.au](mailto:puppyfarming@dlgsc.wa.gov.au)

Here's some supporting evidence to show Backyard breeding needs to be included in this 'stop puppy farming proposal'.

These image are from posts and emails generated within 2 days of today, 3/8/18. It's recent. I could dredge up years of evidence, supporting how people are charging \$400-\$2000 per pup, and many haven't even been vaccinated, so often go somewhere and die of parvo or something equally easily preventable. Some haven't even been wormed or properly weaned before money and pup changes hands.

Communities have high death rates, usually parvo or other significant health issues, so they encourage breeding, to have 'spare' dogs all the time.

Is this cultural, does this have to be considered, is this proposal for change mainly targeting mainstream suburbia/metro situations, is all of WA going to receive the same effective coverage?

These all need to be addressed.

Regards

Wendy Roberts





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