

DEPARTMENT OF LOCAL GOVERNMENT SPORT AND CUKTRUAL INDUSTRIES  
STOP PUPPY FARMING SUBMISSION

DONNA DANIEL

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I am a DogsWest registered breeder of Cocker Spaniels, membership number [REDACTED]

I have been involved in the dog world almost all of my life, having commenced handling my Father's show dogs for him when I was 16 years old.

I have held DogsWest membership for 48 years

I am currently the Secretary of the Cocker Spaniel Club of Western Australia and previously held the office of President for many years.

I have been the President of the National Cocker Spaniel Council of Australia on two occasions.

I am Veterinary Surgeons Board registered Veterinary Nurse and I have worked within the Veterinary industry for over 43 years with 40 of those years at University level.

**While I support the Government's concern regarding Puppy Farming I wish to comment on some of the stated proposals outlined on the Consultation Paper and further covered in the several Stop Puppy Farming Workshops that I have attended. .**

The proposed new legislation will have a negative effect on almost everyone in the general community. It will affect those people who are law abiding and honest citizens, that will simply follow what the Government decrees because it is LAW.

Those who are purported to be the true targets of this proposed legislation will do little to change how they are currently acting and in fact will probably simply ignore what will be required of them to comply, and will possibly become even more "inventive" in their attempts to avoid detection. What is clear is that the Government's proposed legislation to Stop Puppy Farming will make very little difference to puppy farmers because they are currently flying under the radar due to their failure to comply with the already existing requirements to microchip and register their animals. There is a \$5000 fine per animal that is not microchipped, but this is currently not a deterrent to puppy farmers, so it seems that all of this new stuff really isn't going to make much difference to the targets who will simply continue doing what they do all the while remaining undetectable.

This complex, convoluted and multi layered proposal wont change how puppy farmers behave and so they will largely continue to be undetected. It will however increase the growth of black market puppies because it will become even HARDER to obtain a well bred, purebred dog from a responsible breeder. It is the responsible, law abiding people who will be hit hard by all this and the rogues that are supposedly the target will just continue doing what they do.

### **Mandatory Sterilisation (Desexing)**

Unfortunately, there is little information that supports this proposed legislation in regard to its effect on controlling Puppy Farming, in fact there is **no literature** that indicates Mandatory Sterilisation has the desired effect of reducing the incidence of Puppy Farming.

The strongly held world-wide opinion is that Mandatory Sterilisation is a **failure** in this regard.

The Australian Veterinary Association does not support Mandatory Sterilisation.

Mandatory Sterilisation has been **rejected** by Queensland, New South Wales and Victoria. In 2001, it was introduced into Australian Capital Territory and although it is still legislated, it is acknowledged that it has failed to reduce the admissions into shelters and has failed to reduce the euthanasia rate of unwanted animals. Studies have found that most surrenders to shelters and subsequent euthanasias in ACT are as a result of behavioural issues, not the lack of available homes.

Because of its small size, ACT does not have any known puppy farms within its boundaries. Mandatory Sterilisation has been sold to the public as being about STOPPING PUPPY FARMING, yet this major pillar of the Government's proposed legislation is something that has NO world-wide support in relation to that task.

Wherever it has been introduced, Mandatory Sterilisation has failed to reduce the admissions into shelters and pounds and has failed to be effective in reducing puppy farming.

One common significant finding in any region which has legislated Mandatory Sterilisation is that it has resulted in the reduction of the dog population in that region.

Is this the real intent of this legislation? Does the Government want to reduce the number of dogs living within Western Australia?

Should Mandatory Sterilisation become law in Western Australia and this common effect of reduction in dog population is seen, there will be significant effects on other stakeholders.

There are many businesses that would suffer a downturn as a result of reduced dog population.

The veterinary industry is a major player and would be hit hard. There would be reduced employment opportunities for vets, nurses and others who work within that industry.

The dog food manufacturers, and those who sell and market these and other peripheral supplies such as City Farmers would be hard hit as well, again with reduced opportunities for employment. Groomers, boarding kennels, and dog trainers would also be affected.

Probably a more important effect of reduced dog numbers within this state is the well recognised benefits that companion dogs bring to people's lives.

It is recognised that Dog Ownership is extremely beneficial to people and companion dogs are of great benefit to their families for many reasons.

The psychosocial and physical health benefits of dog companionship are well known and well documented, so it's puzzling to see that the Government is proposing to introduce legislation that will reduce the ability of the general public to be able to have a dog as a companion.

Coupled with the already recognised failure of Mandatory Sterilisation to effectively reduce the Government's stated target of puppy farming, this seems to be a very strange thing to force upon the people of this state. There seems to be little benefit in it at all.

Enforced sterilisation of companion dogs is fraught with other issues, not the least being the risk to the long term health that sterilisation can cause.

The overwhelming scientific research and published papers indicate sterilisation to be closely associated with very many deleterious health conditions in dogs.

There is good indication that the onset and severity of some diseases is linked with the timing of sterilisation, that the earlier a dog is sterilised the earlier it is likely to develop certain serious issues such as some forms of cancer, especially osteosarcomas and some forms of leukaemia. The aggressiveness of the disease is also noted to be linked to age at sterilisation.

There is clearly demonstrated increased incidence of cruciate ligament rupture, luxating patella, hip dysplasia, hypothyroidism, Cushings disease, Addison's disease, diabetes, acute pancreatitis, immune mediated conditions, osteosarcoma, many other forms of cancers AND the old one that castrating a dog will prevent prostate cancer is now known to be quite the opposite, that castration *increases* the likelihood of the occurrence of prostate cancer in dogs.

There are papers that now link longevity to lifetime exposure of gonadal hormones ie the longer the dog remained entire, the longer it lived a healthy life and the greater age it reached.

My personal opinion, based on my own experience as a breeder, is that this is very true.

I have come full circle in the journey of sterilisation. In my very early days as a breeder I sterilised puppies at 6 weeks of age, prior to sale at 8 weeks. We did things very differently in those days !! Those dogs were so very different to their entire littermates that I kept for myself, as part of my breeding programme. They were not robust, healthy dogs and as they grew older they suffered from numerous endocrine diseases while the dogs that I kept and were entire, remained well and fit right into old age. It took a while for me to realise that taking away an important part of these little puppies' endocrine system without it having any influence at all on their development was largely the cause of these problems or at the very least was the cause of the severity of their disease.

In numerous Scandinavian countries it is illegal to sterilise a dog unless there is a medical issue for which sterilisation is the primary form of treatment.

This has been in place for over 25 years.

**These countries have some of the lowest impound rates in the world. and very little trouble with puppy farmers because well bred dogs from responsible breeders are readily available and easy to obtain. There is no need to source a puppy from a pet shop or a puppy farmer.**

Mandatory sterilisation will cause quite the opposite situation here, with quality dogs being so very hard to get, enabling black market puppy sellers to flourish in a severely depleted, high demand market.

In these Scandinavian countries, there are government education programmes targeting responsible dog ownership starting in primary schools and continuing for several years. It's all about education, not legislation.

In WA should this proposed Mandatory Sterilisation legislation become law, it will be the opposite.... regulation for the already regulated.

Mandatory Sterilisation will shrink the gene pools of many breeds within WA. Perth is the most isolated capital city in the world and it can be difficult for breeders to be able to keep dogs for future breeding programmes if their numbers on their property are restricted by Council or state laws.. Many breeders place dogs in companion homes with families, where they enjoy a great life as a loved family companion but are also accessible for their breeder to utilise at a later time to enable their breeding programme to continue to grow. Mandatory sterilisation is likely to make that much harder to do and in fact may be impossible in some instances. Keeping gene pools as wide as possible is vital to the health of pure bred dogs and being able to access dogs easily for breeding purposes is so important. This legislation is problematic for breeders who chose to place out breeding stock into companion homes and will potentially result in significant reduction of gene pools. It may even result in population bottlenecks from which it will be extremely difficult to recover.

If the Government believes that Mandatory Sterilisation will make it harder for puppy farmers to obtain their breeding stock because there will be far fewer entire dogs in Western Australia, they are sadly mistaken. Qld, NSW and Victoria have all rejected Mandatory Sterilisation. If puppy farmers cant find breeding stock in WA all they will need to do is to look to these other states for their dogs. The government cannot prevent that from happening.

### **FIRST DO NO HARM !**

In the light of the acknowledged fact that Mandatory Sterilisation is not effective in stopping puppy farming and coupled with the ever-increasing scientific reports indicating that sterilisation is not innocuous and has deleterious effects upon the health and quality of life of many dogs, the Government should not mandate sterilisation unless it can prove convincingly that sterilisation is not harmful to dogs

It is not reasonable or fair to attempt to fix one problem using a method that is more than likely to cause loss of quality of life, suffering and even death to more dogs than may be helped IF Mandatory Sterilisation was effective against Puppy Farming. The Government's argument and planning is seriously flawed.

People in Western Australia should be able to maintain their choice of when and IF their companion dog will be sterilised and that decision-making process should be a well informed one with input from their veterinarian and knowledgeable breeder.

The Government should fund education for owners or potential owners of dogs to ensure that they are aware of the high level of responsibility that comes with dog ownership, rather than mandating a procedure that will not be of benefit to many dogs in the community.

### **Transitioning Pet Shops to Adoption Centres**

Pet Shops are not a suitable environment for dogs and puppies, let alone to become retail outlets for rescue dogs.

This is the double whammy of impulse buy combined with warm and fuzzy "I'm gunna save a rescue dog" !!

There is so much that is wrong with this concept.

Pet shops are not the right environment for the sale of anything with a heartbeat.

Selling dogs with no known history is potentially disastrous. The government has said that they will require these dogs to have been temperament assessed by suitably qualified animal behaviourists.

I have spoken to a well known highly qualified Veterinary behaviourist.

She has read the information that the Government has produced regarding this proposal and was very concerned about the proposed behavioural assessments of rescue dogs. She is of the belief that this is quite flawed, as accurate behavioural assessment is dependent upon available history usually supplied by owners. In the case of rescue dogs there is very little history available.

Behavioural testing, which is different to behavioural assessment, is relevant only to the present time and environment in which the testing is done, therefore cant be used as a predictor of future behaviour. In the light of this expert opinion it raises all sorts of issues regarding risk, liability and suitability of rescue dogs to be sold through a retail outlet that is, after all, driven by the absolute need to make as large a profit as possible.

Responsible breeders carefully screen their potential new owners and spend time getting to know a bit about their lives and how a dog will fit into the family dynamics. This process is important to the people involved in obtaining a companion dog, to ensure a good match, but is most vital for the dog concerned.

Considering that most rescue dogs have had disruption in their lives and some have had a tough time, this careful consideration regarding suitability of the potential home is absolutely essential to prevent a revolving door situation.

It is highly unlikely that pet shop staff or owners will be prepared to so carefully screen potential owners and nor will they have the ability to make sure that there is a good match of dog to family.

A better idea would be to encourage petshops to offer information to people wishing to source rescue dog. Videos could be made available of dogs that may be suited to individual owner's requirements and the petshops could offer the contact details to the interested parties. Because this option would not be particularly attractive to petshop owners from a business point of view it may not be readily accepted by them.

DONNA DANIEL