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## Who is Dogs West?

### Our Origins

#### **We believe that all dogs deserve responsible owners**

Our origins trace back to late 1800's with the formation of the WA Kennel Club which was incorporated in 1912 and was the original 'canine association' for Western Australia.

After World War II the association formally adopted the name of Canine Association and came under the auspices of the Royal Agricultural Society, with the WA Kennel Club becoming an affiliated club. The Canine Association became an affiliate of the Australian National Kennel Club (now trading as Dogs Australia).

In 1977 the Canine Association of WA became an independent Association from the Royal Agricultural Society, and four years later purchased our grounds in Southern River. The Canine Association of WA now trades as Dog West.

### Our Objectives

The first three Objectives under our Constitution clearly state our purpose:

- To promote and encourage the breeding of pedigree dogs
- To foster, promote and protect the interests of Members of the Association relative to dogs
- To promote, foster and encourage the welfare and care of dogs

The protection of the pure breed dog, their welfare, care and future, is at the core of our Association. We also welcome all dogs, regardless of parentage, owned by our Members and the public that enjoy dog activities run by our many Affiliates.

The Association has a Constitution, Code of Ethics and Regulations which apply to all Members and which are policed and enforced by a proven governance framework.

The responsibility of breeding good quality pure bred dogs that are sound in mind and body is one that breeders take very seriously. Many hours are spent, reviewing pedigrees and assessing dogs for health, structure and temperament before breeding decisions are made, and then over selection of puppies for future potential canine activities and breeding.

Puppies and dogs are placed into companion homes after a selection process to ensure the suitability of the dog for the prospective owners.



## Members and Activities

With a Membership of 2,500 our Members enjoy a wide range of activities with their dogs, including conformation breed showing, retrieving and field trials, endurance trials, tracking, herding, agility, lure coursing, dancing with dogs and obedience.

Our membership reflects the broader community, ranging from young dog handlers, families, single members and those in their later years. We are an inclusive community of common interest and many Members have a wide group of family and friends who share their interest.

## Dogs West Member Affiliates

There are 60 Clubs affiliated with Dogs West including single breed clubs, groups of breeds club, all breeds clubs, agility, training and obedience clubs, lure coursing, herding and retrieving clubs.

Activities run by Clubs and individual Members attract the general public, who come along to socialise and train their dogs, take part in breed fun days and to meet with friends and acquaintances who share a common interest.

The Dogs West venue is an active centre for most of these events, as well as educational events, learning about responsible dog ownership and their responsibility when breeding to raise a happy and healthy dog.

Events take place at other locations, including country centres like Geraldton, Bunbury and Albany, as well as across the metropolitan area.

Many of our affiliated clubs have an extended base of members. The Northern Suburbs Dog Club, for example, has around 1,000 Members involved in training for Obedience, Agility,

Dancing with Dogs and Rally-O.

Track West, an affiliate club dedicated to the sport of Tracking runs tracks in many places, and has a strong, active membership. Tracking dogs assist police and other services from time to time.

Many of our Clubs and individual Members assist with the rehoming of dogs. An example is the Poodle Society of WA who run a rescue/rehoming line. They advise it is uncommon for dogs from Dogs West breeders to need the service. They have a waiting list of approved homes for older poodles. Many Clubs and individual breeders provide their details to Council Pounds to assist with the rehoming of pure bred dogs.

Dogs West has been proactive and ahead of legislation in areas such as positive identification for dogs. Dogs West members were required to microchip ALL dogs many years before it became law in WA and many breeds have used tattoos for positive identification for many years.

Dogs Australia has a long established and effective Health and Well Being Committee whose Charter has a primary objective to work towards the reduction of canine hereditary diseases in Australia.

## Part of the worldwide pure-bred dog community

Dogs West is a Member Body of the Australian National Kennel Council (ANKC) trading as Dogs Australia, which provides overarching governance of the pure bred dog register for each of the State and Territory Member Bodies in Australia. The Dogs West President is a Director of Dogs Australia.



The total membership of all Dogs Australia Affiliates is approximately 33,000. Dogs Australia is recognised in other countries as the peak body for the pure bred dog in Australia. This includes The Kennel Club (UK), the American Kennel Club, the Canadian Kennel Club, the New Zealand Kennel Club and the Federation Cynologique Internationale (FCI) – the largest canine association in the world with 95 Affiliated Countries and 1.7 million members.

Through these alliances dogs bred in Western Australia are recognised globally through the unique registration number assigned to them by Dogs West. Dogs bred in Western Australia, and Western Australian Judges, have competed and officiated in many overseas Countries with distinction.

Dogs Australia affiliates contribute financially to research in Australia promoting the health and well-being of all dogs often targeting breed specific genetic and congenital conditions.

## Summary

Dogs West is an important part of the community and provides many services and activities to enable dog owners to better understand and appreciate the enormous potential their best friend has to offer.

Australia has one of the highest rates of pet ownership in the world and this is credited with reducing the cost of health expenditure, by having such a positive influence on our lives. Our Membership reflects the make-up of the wider community. Dogs West supports friendship and purpose for our Members, including those in later years, and provides opportunities for younger members of the community to take part in many activities. Junior dog handlers can compete in a Dogs Australia dog handler competition, with each State winner competing to represent Australia in the final at Crufts UK each year. Western Australia has had a junior handler Member win through and compete at Crufts on a number of occasions.

Importantly, Dogs West works with the community offering advice and a range of training options on the care and welfare of their dog – we believe all dogs deserve responsible and caring owners.

The RSPCA website clearly outlines the health benefits of pet ownership in the community.

The West Australian community must have access to thoughtfully bred and healthy puppies from our Registered breeders, and our Members deserve to maintain the right to share their lives with their beloved dogs.

*During the consultation workshops held at Dogs West, Lisa Baker MLA regularly referred to Dogs West as setting the standard in this area. During the final workshop Lisa Baker MLA stated that Dogs West Members are the Gold Standard.*

# 1 Sterilisation of Dogs

## Dogs West Position

- Dogs West does not support the compulsory sterilisation of dogs.
- The Sterilisation of Dogs and Approval to Breed Permits are interlinked and will have impact on Dogs West Members.

## Recommendations

- That Dogs West financial Members be given dispensation from compulsory sterilisation of their dogs.
- That any registration renewal for the above dog/s would require the presentation of a current Membership Card of Dogs West applicable to the owner/s of the dog.

### 1.1 Identify a sterilised dog

Tattooing should remain an option. Dogs West supports the ongoing use of tattoos to identify sterilised dogs for the following reasons:

- Makes any dog easily recognised as sterilised in the absence of a registration tag,
- Many registered dogs don't wear a tag whilst on their own premises – meaning an escapee would not be identifiable easily,
- Tags become lost or difficult to read,
- A tattoo means that a dog does not have to be scanned to identify to find microchip and then look to see if sterilised,
- Microchips have been known to move in a dog, and have failed, and
- Most dogs are sterilised after they are registered, and people don't update it till the dog registration renewal.

### 1.2 Show dogs and Performance dogs

- A tattoo would not affect a show dog, or any dog participating in any Dogs West Sanctioned event.

### 1.3 Classes of dogs exempt from sterilisation

Dogs registered with Dogs West and owned by a financial Member of Dogs West should be exempt from sterilisation.

This should be for Dogs West Members who do not have a Prefix and therefore do not have approval to breed under Dogs West and Dogs Australia Regulations.

Financial Dogs West Members who hold a breeding prefix should be granted an approval to breed dogs, the same as is allowed for Cat breeders under the Cat Regulations 2012.

**More detail regarding the proposed Regulation is under 4. Approval to Breed in this submission.**

***“Only organisations that can demonstrate standards and regulations with proven methods of compliance should be considered”.***

This was a statement in an earlier consultation paper on the proposed Stop Puppy Farming Legislation.

Dogs West, a not for profit Member of Dogs Australia, remains the only organisation in Western Australia which meets such criteria.

Dogs West Constitution, Code of Ethics and Regulations are maintained and upheld and instruct Members with information and tools necessary to meet their legislative, policy, accountability, and Member responsibilities.

**Dogs West actively seeks to ensure that our Members maintain compliance with our Regulations. This includes a permanent Compliance Officer on staff, a volunteer-run Governance arm with 5 working parties/panels covering compliance, dog temperament testing and breeders education.**

Our structure, governance and physical presence in Western Australia differentiate Dogs West from online registries which are private businesses.

**Dogs West Members must be exempted from mandatory sterilisation requirements for their dogs, and dogs on “breeder’s terms” in companion homes, for the lifetime of the dog.**

## Commentary

### Dog ownership in Western Australia

In 2016, Western Australia had 938,097 households, with 38% of those households owning a dog/s.

Assuming an average life span of 10 years and assuming that 1 in 5 households own two dogs, around 43,000 dogs are required each year to maintain the current demand for companion dogs, a demand that clearly cannot be met by Dogs West Members (who produced approximately 13% of the puppies required).

Compulsory sterilisation will impact on Dogs West breeders being able to maintain a healthy and genetically diverse breeding pool of dogs to continue their breeding programs.

It is fundamental to the ongoing health of dogs that dogs on breeders terms, living in companion homes, not be impacted by compulsory sterilisation, nor should they have to register as a breeder because they own an entire (unsterilised) dog.

**They are helping breed custodians, they are not breeders themselves.**

It is unlikely that there will be a significant increase in the number of puppies bred by Dogs West breeders.

Some puppies will be sourced from Dogs Australia Registered Breeders in other States, when puppies of a particular breed are not available in Western Australia, or when breeders are looking to diversify their bloodlines.



We recognise not all purchasers are looking to buy a pure bred puppy, but rather a mixed breed. This proposal to introduce mandatory sterilisation will impact on the total number of dogs available, pure and cross breeds.

### Availability of well-bred dogs as companion animals

From time to time we have feedback from Members that they cannot meet demand for pure bred dogs. Sterilisation regulations will exacerbate this issue as Members will be forced to reduce numbers in their breeding programs as a result of mandatory sterilisation, and if a permit to breed is refused.

**It was recognised during the consultation on the Stop Puppy Farm proposed Legislation that dogs and puppies are regularly shipped into Western Australia to meet the demand for companion animals.**

This argues against the requirement to have all dogs sterilised to reduce the number of unwanted dogs and may increase the numbers of dogs and puppies being flown in to meet demand.

It is acknowledged that some puppies are sourced from Dogs Australia Registered Breeders in other States, when puppies of a particular breed are not available in Western Australia, and the reverse occurs when breeds are not available in other states.

In addition, a Dogs Australia study undertaken in 2015 showed that the vast majority of dogs in Australia were sourced from other than Dogs Australia registered breeders. As puppy buyers are purchasing from multiple sources and mandatory sterilisation will reduce stock across all sources, the result will be a shortage of companion dogs in the WA community. This demand is unlikely to be met by Dogs West breeders and will only increase the demand for puppies from commercial suppliers outside of Western Australia. This poses additional issues and will reduce the availability of well-bred dogs as companion animals in WA.

### Impacts to Dogs West and the wider community

Not all Dogs West Members breed dogs. Members take part in a wide variety of activities, covering 13 Disciplines including:


- Agility
- Conformation Show Dogs
- Dancing and Tricks with Dogs
- Earth Dogs
- Endurance
- Field Trials
- Herding
- Junior Handlers
- Lure Coursing
- Obedience
- Retrieving
- Scent Work and Tracking

Members who participate in these activities should be able to choose to keep their dogs entire, i.e. unsterilised. This supports optimum performance, drive and sound physical development of the dog, reducing injuries.

In addition, these activities provide an important social outlet for the many Members, friends, and associates. Over 300 shows, tests, and trials, held across Western Australia, including 60 Affiliated Clubs provide a bedrock for community connection and inclusion. As recognised by Mentally Healthy WA and Act Belong Commit who state *“staying active, connecting with others and doing something meaningful are powerfully protective and provide the foundations for mental health and wellbeing”*. This network of competitions and volunteerism is an integral part of the social network that supports many Members, many whom live alone and/or are in their later years of life.

Some of Dogs West activities require the dog to be unsterilised to compete. For this reason, there are a number of members who do not breed but safely managed unsterilised dogs. The mandatory sterilisation will have a significant impact on Dogs West competition and its Members who participate in these activities.

**We recognise the benefits of choosing to not sterilise dogs.**



***Before I was born***

my ANKC breeder studied my pedigree for a very long time and carefully chose my mum and dad  
my parents and their parents were health checked or tested  
my whole family have proven at the shows that they conform to the ANKC breed standard  
someone had me in their thoughts and loved me

***After I was born***

my breeder took great care of me, so I grew up well  
my breeder put a lot of effort to socialise me  
my breeder chose my new family carefully

**Responsible breeders - they protect, preserve and better the breed  
be a responsible dog owner - choose wisely**

## 2 Pet Shops

### Dogs West Position

- Dogs West remains opposed the sale of ANY dogs from Pet Shops.
- Dogs West Members are prohibited to sell or have for sale any dogs at any Pet Shops.
- Dogs West does not believe that a Pet Shop environment is appropriate for the sale of any dog.

### Recommendations

- That Pet Shops be prohibited from selling dogs of any age.
- That Pet Shops have information available to disseminate to those enquiring about rescue dogs available from shelters, and their location.
- That Shelters run by Dogs West Clubs and Members for specific breeds of dogs be recognised and accredited.
- That buyer education should form a critical part of any project to reduce the number of unwanted dogs in shelters and puppies sourced from PUPPY FARMERS.
- Education programs should be targeted at the wider community to ensure dogs are well matched to their new homes and to ensure responsible pet ownership.

### Commentary

#### Allowing pet shops to sell rescue dogs is flawed logic

While we accept that the main driver behind the proposed legislative change is to improve animal welfare by inhibiting the operations of poorly run and inhumane puppy farms, we feel that the amendments allowing shelter dogs to be sold through pet shops is based upon flawed logic.

If pet shops are deemed as not a suitable place for puppy sales, then it certainly follows that neither are they a suitable place for the sale of rescue or shelter dogs and puppies, who often have their own unique issues from their experiences.

The trade of live animals through shop front sales is inappropriate, outdated and does not reflect current community standards. We should not continue to permit pet shops sales of dogs and puppies, regardless of where they are sourced.

Most pet shops have already successfully transitioned to better business models that support the pet industry in other ways such as grooming; the sale of toys, food and crates; and adding services such as doggy day care and dog wash/bath facilities to their retail offering. Only a few pet shops still sell puppies and dogs in Western Australia.

The potential implications of the proposed legislative changes are significant. For example, how can it be guaranteed that the new system will not create a loophole that allows pet shops to exploit shelters, who will be relying on the income they generate from their dog sales. This poses a potential conflict of interest which will advantage pet shops and rescues to the detriment of the rescued dogs.

We feel that the appetite for changes to the Dog Act has come about, in part, due to the behaviour of those retail pet shops who have failed to recognise and keep up with shifts in public expectation. We should not continue to support the outdated practices of these organisations at the expense of the welfare of shelter dogs and puppies.

### Pet shops are not a suitable environment for dogs and puppies

Being placed in a shelter is a very difficult, distressing time for many dogs and moving them again, from a shelter to a pet shop, will only add to that stress.

A representative from Dogs West visited both the RSPCA and Shenton Park Dogs Home in June 2018 and observed that a number of enclosures displayed signs advising 'don't judge me by my behaviour in the kennel, ask to meet me outside'. If a kennel environment is recognised as being too stressful for some dogs, then placing them in a pet shop is not ideal either.

Pet shops are also ill equipped to handle adult dogs. Most have been set up for small stock, not adult dogs, and lack the required infrastructure and experience to appropriately handle these animals. Shelters and rescue organisations on the other hand are purpose built to safely and humanely house dogs of all sizes.

**Pet shops could promote the responsible purchase of rescue dogs from shelters and their location. Pet shops are not a good fit for already stressed dogs in a rescue situation. Please do not put dogs and puppies into a pet shop environment.**

### Contributing to the problem of impulse buying

One of our main objections to pet shop sales of dogs is the opportunity for impulse buying of dogs not suited to the circumstances of the purchaser, and the consequent likelihood of these dogs being surrendered again.

**The decision to buy a dog should be a well thought out process. It cannot be treated in the same way as other retail purchases. Placing dogs in a retail environment, treating them as a commodity, sends the wrong message to the community and bypasses the important screening processes and after sale support that reputable breeders undertake.**

Our responsible Dog Breeders will spend time with the potential owners before committing to the sale of a dog.

Similarly, many potential buyers prefer to research appropriate dog breeds, contact local breeders and take the time to visit puppies to meet the parents and get to know the breeder.

Responsible shelters also spend time with potential owners, watching them interact with the dogs to ensure an appropriate match is achieved. Shelters require people to lodge applications for purchase, and many also provide 'cooling off periods' should there be any issues with the dog once it is placed in the new home.

The Dogs West Code of Ethics provides for penalties and sanctions against Members who supply dogs to Pet Shops or pet wholesalers, providing them as a prize or a donation, or from surrendering dogs to a shelter. This also applies to a Member's dogs being advertised, displayed or sold on commission by a commercial dog wholesaler or retail pet dealer.

Dogs West also does not believe that any Rescue should be advertising that they are looking for Dogs for rehoming.

### 3 Dog Supply Approval

#### Dogs West Position

- Dogs West does not support the selling of dogs through pet shops.
- Dogs West supports ethical and competent shelters.

#### Recommendations

- That Buyer education should form a critical part of any strategy to reduce the number of unwanted dogs and dogs sourced from PUPPY FARMERS.
- That dogs and puppies are not supplied to Pet Shops.
- That Pet Shops be encouraged to refer potential puppy/dog buyer to an approved rescue or Breeder.
- That Rescues do not proactively source or breed animals.
- That Dogs West Member breed rescues be prescribed under Section 7(3)(b) of the Dog Act.

#### Commentary

##### Reducing dog numbers in shelters

We understand and agree with the objective to reduce the number of dogs moving through shelters.

However, it must be acknowledged that there will always be dogs that accidentally stray, and the majority of them find their way home thanks to microchipping and the work of Local Government Rangers. Dogs are social animals. Dogs will escape by accident, due to inadequate maintenance on gates or fencing, and during fireworks and storms. Local Government deals with serial offenders in this regard.

There are other reasons that dogs find themselves needing to be rehomed. People's lives and circumstances change for a myriad of reasons.

Sometimes the dog has to be rehomed because the owner has made a poor choice on the type of dog they have taken in as companion animal, which proves to be unsuitable and/or unmanageable.

**Buyer education should form a critical part of any strategy to reduce the number of unwanted dogs and dogs sourced from PUPPY FARMERS.**

Pure Bred dogs come with fairly accurate data around behaviours, trainability, suitability for certain activities, size, coat management, personality and life expectancy.

Dogs Australia offers a breed profile for every pure bred breed which is available on the Dogs West website. With cross bred dogs it is more difficult but a matrix on possibilities should be provided.



### Need for accountability

Appropriately managing and rehoming rescue animals can be a complex process and we feel that applying a 'one size fits all' approach to the accreditation process for shelters may not achieve the improvements to animal welfare that the Regulation is aiming to achieve.

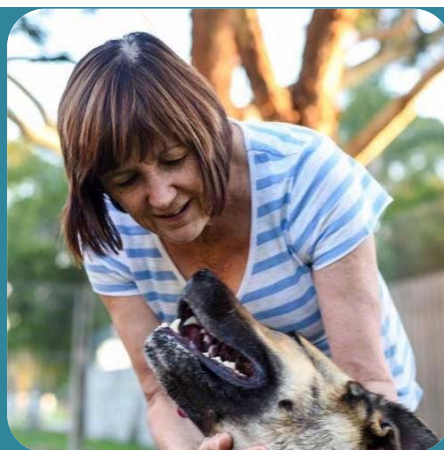
For example, rescue organisations that operate under a 'no kill' policy may sound noble, but in reality, they may be risking the safety of people and other animals.

While it is understandable that some people do not like the idea of shelters euthanising animals, it is a sad fact that some dogs are not well (including mental illness), having been permanently damaged by their prior experiences and it is both kinder and safer to euthanise these animals.

*The Western Australian woman mauled to death by a dog loved the animal despite knowing it could be aggressive, a shocked friend says.*

*Sue Lopicich was killed on Tuesday afternoon at the boarding kennels she ran in suburban Perth.*

*Ms Lopicich had spent years rescuing and caring for unwanted dogs.*



A Dogs West representative visited two major shelters in Perth and found most dogs were large mixed breeds who were stressed, nervous and aggressive. Some of these dogs have the capacity to adversely react to certain situations and if triggered, could cause considerable injury to a person or another animal.

For these dogs to be successfully rehomed, they must go to owners who have a high level of expertise and patience with considerable knowledge of managing difficult behavior. Far too many end up in the hands of people who are well-meaning but uneducated in animal behavior, and have adverse outcomes.

Shelters must exercise a high degree of discretion and accountability, rather than operate under a single set of prescribed policies and procedures.

**The health, welfare and quality of life of dogs in rescue should always be the first consideration and we believe that many shelters have their welfare foremost.**

Rescues and shelters should never be breeding enterprises.

### Dogs West Member Breed Rescues

Our Breed Rescue Groups were born out of the concern of Members and breeders of various breeds to find homes for unwanted, abandoned, stray, mistreated or neglected dogs of those breeds.



These groups are made up of dedicated volunteers who house, care for and carefully place pure bred dogs, and often crossbreeds of their breed, in permanent homes.

It should be noted that the vast majority of dogs rescued by our Breed Rescue Groups are not bred by Dogs West members.

For prospective dog owners who are interested in a particular breed, this type of rescue group provides an alternative to breeders or pet shops. An important plus is that these rescue organisations do not contribute to the companion overpopulation problem.

Breed specific rescue groups work hand in hand with and complement the work of animal shelters. Many shelters maintain a list of breed groups, and when a purebred is received, call for assistance with placement, easing pressure on the shelter. Additionally, many breed rescue groups take dogs who might be considered less adoptable by some shelters, such as dogs who are older or have special needs.

As breed specialists, Breed Rescue Groups know what to expect in terms of personality and temperament and even what medical problems dogs of that breed might be prone to suffer. This knowledge helps them to make successful placements. Most of them rely heavily on foster homes to care for dogs until they are adopted. Foster families generally can provide a loving home environment and can keep dogs for extended periods of time.

Our Rescue groups may sometimes spend hundreds (even thousands) of dollars caring for individual animals. In addition to general veterinary care and spay/neuter operation, rescue groups often work with private veterinarians to treat special medical needs or injuries. This isn't to say that rescue groups have lots of money — they don't!

The most valuable commodities to rescue groups are volunteers and funds.

### Accreditation requirements may disadvantage smaller shelters

In addition to the animal welfare concerns raised above, introducing an accreditation requirement will put undue pressure on smaller shelters who will not have the necessary resources to participate in an accreditation process.

Smaller shelters, while providing a vital animal welfare service to the community, will not be able to compete with larger organisations, and will potentially see a decrease in the revenue sourced from their re-homing programs, potentially making it difficult to continue operating.

Many smaller shelters are breed specific and are run and/or supported by Dogs West Clubs and individuals on a volunteer basis who use their specific breed knowledge and skill to ensure that rescue dogs and puppies are cared for and are appropriately rehomed.

These breed rescues offer services and advice that other shelters can often not provide for specific breeds. Their knowledge and skill is invaluable and it would be to the detriment of many breeds if they were would not able to continue this work.

### Interstate transfer of dogs into shelters

The proposal to transition pet shops to sell only rescue dogs is aimed at reducing the number of unwanted dogs in shelters in Western Australia.

It is of concern to Dogs West that some rescues have been known to source dogs from pounds and shelters in other States to come into shelters in Western Australia or advertise for rescue dogs.

This highly questionable practice perpetuates the commercial exploitation of stressed rescue dogs and in our view is unacceptable.

If there are too many dogs in shelters – why is this happening?

We are not opposed to the transportation of individual shelter dogs between states – provided that the dog has a designated companion home to go to.



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ANIMALS AVAILABLE

DOGS

APPLICATION PENDING -  
1102 MARLEY - Bull Mastiff x Boxer (M) - 1 year old  
Marley is now on SPECIAL for \$100

APPLICATION PENDING -  
1105 TURBO - Staffy X (M) 12 weeks  
1108 BEAU - Australian Koolie (M) 4 years

WANTED FOR REHOMING - small to medium dogs

CATS/KITTENS

Expressions of Interest  
Oriental x (F) 1 year old coming soon (see Andrea)  
Free - approved home only

WANTED FOR REHOMING - kittens up to 12 weeks old

DOGS \$250 - Unless otherwise stated.  
CATS \$120 - Unless otherwise stated.  
All animals are micro-chipped, sterilised (or voucher if too young), vaccinated, vet checked, temperament tested, worm and flea treated, collar and lead (dogs), collar and engraved tag (cats).

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## 4 Approval to Breed

### Dogs West Position

Dogs West Members who are financial and hold a breeding Prefix should not be able to be refused approval to breed dogs.

Whilst the Act stipulates conditions under which approval can be refused, it does not take into account the variability across the 137 Local Government districts in Western Australia.

There is already such variability in the management of dogs within their districts. Some Councils allow permits for more than 2 dogs, for example, whilst other Councils do not, even though their general district circumstances are much the same.

We have had Members approach their Local Government to illicit their views on Permits to Breed, and some have been told they will not be approving them.

Dogs West Members must have exemption from mandatory sterilisation for dogs partaking in Association activities; to maintain their breeding programs and a healthy genetic pool for their breed.

We have concerns that the discussion paper includes the following under section 4.1

*Part A: Owners details (note: specify individual)*

- *include address: note change of local government district needs to trigger cancellation of approval to breed.*
- *include whether member of breeding association for advertising on website.*

This would infer that breeder information going to be displayed on a yet to be declared website. This is a serious concern that the location of breeders being made public which can lead to puppy thefts.

### Recommendations

- That Regulations include a clause giving Dogs West Members approval to breed the same as in the Cat Regulations 2012:

*xx. Person may not be refused approval to breed dogs*

*A local government is not to refuse an application for the grant or renewal of an approval to breed dogs if the applicant —*

- (a) has attained the age of 18 years; and*
- (b) has not been convicted within the previous 3 years of an offence against —*
  - (i) the Cat Act 2011; or*
  - (ii) the Dog Act 1976; or*
  - (iii) the Animal Welfare Act 2002;**and*
- (c) is a current member of one of the following organisations —*
  - (i) The Canine Association of WA Trading As Dogs West*

- That renewal of such approval will be incumbent on producing a current Membership card of Dogs West of the person/s seeking approval. Dogs West Memberships are subject to annual renewal.
- That dogs owned by Dogs West Members and those sold on 'Breeders Terms' by Dogs West Members be exempted from any sterilisation for the lifetime of the dog.

- That any Breeder Permit number be the same as the Dogs West Member number for ease of tracking and identification.
- That no location information of owners/breeders is publically published at any time or in any format without the express permission of that individual.

## Commentary

### Registration as a 'Dog Breeder' for owners of entire dogs

Government proposes that anyone who owns an entire dog will have to apply to be approved as a 'Registered Breeder'. It is hard to understand the rationale behind this concept.

It was stated that this was to identify the owners of unsterilised dogs.

**This is already known from registration data held by Local Government now.** Owners of entire dogs pay a premium for their dog registration under the current Regulations.

In 2016, Western Australia had 938,097 households. Canstar stats show that 38% of households have dog/s and that 18% are not sterilised. Therefore, the number of households that could be impacted by the additional requirement to become a registered breeder if they own an entire dog is around 64,000.

The concept of classing everyone who owns an entire dog as a dog "breeder" is clearly flawed.

People would be on a register as a breeder – but would never breed their dog. If there is to be a useful breeder register – it should only hold the details of persons who do produce puppies from either their stud or whelped bitch.

The term "backyard breeder" has come to be associated with PUPPY FARMING but this blanket terminology should not be used to encompass those who occasionally and responsibly breed companion animals in a home environment in good conditions from animals who are part of the family group. Please refer to Appendix A.

A severe reduction in the number of people able to breed puppies could see a shortfall in the supply of puppies and young dogs, bred in favorable conditions, available in Western Australia forcing the market to source a companion animal interstate from large breeding enterprises, or from undetected PUPPY FARMERS.

### Registration of Breeders from canine associations

Our assertion is that Dogs West Members must be recognised as compliant and registered as Breeders on any breeder register.

Dogs Australia mandated microchipping for dog identification before it was legislated in many states, including Western Australia. Every State Member Body is able to confirm the breeder of any dog on the Dogs Australia Registry.



Every puppy bred by a Dogs West Member must be registered and hence is traceable to the breeder Australia wide – not just Western Australia.

Dogs West breeders must act within the Code of Ethics and Regulations of Dogs Australia and Dogs West, and a proven governance framework is in place to enforce these requirements. Our governance framework is proven and robust.

**Our record of taking action is a testament to our administration of Dogs West regulations. Penalties applied are published on the Dogs West website.**

Membership of Dogs West does not automatically permit members to breed dogs. Members cannot apply for a breeders prefix until they have been Members for a minimum period of 12 months and they must own a Main Registered bitch. Members must also complete, submit and pass a Breeder Education Prefix Exam with a pass mark of 90%.

**In the interests of transparency and usability we recommend that the Dogs West Member number be the same number used on any proposed Registration System.**

**This will enable users of the Dogs West register to efficiently reference detail with the proposed Centralised Registration System. This move has been supported in South Australia where Dogs SA assist to maintain current member detail on the state-based register.**

### Dogs West Regulations

Dogs West are regulated by a robust Code of Ethics and Regulations for the breeding and keeping of dogs. Our Governance processes are robust and proven.

Our Code of Ethics regulates the health and welfare of breeding dogs including:

- Breeding ages – both minimum and maximum
- Timing between litters
- Total number of litters
- Close relative breeding
- Microchipping
- Sale of dogs
- Health testing requirements
- Breed specific limitations (for example hip scores)
- Inter variety breeding regulations (for example long and short coat Chihuahua)
- Vaccination
- Breed information and care

Dogs West are considered to be the GOLD STANDARD due to our Regulations, Code of Conduct and governance to these regulations are investigated and disciplinary action is taken.

We employ a Compliance Officer to monitor and report on Compliance.

**Our Compliance Officer to member ratio is much higher than any Local Government ranger to ratepayer ratio and our Compliance Officer deals with just one item, dogs. Rangers have to deal with a myriad of issues not all animal related.**



## 5 Microchipping

### Dogs West Position

Dogs West had compulsory microchipping for dogs in place before it was mandated by Government. This is both for positive dog identification for health testing results and to assist in the reuniting of lost dogs with owners.

### Recommendations

- That the breeder number be also on the microchip, if possible.

### Commentary

Dogs West has long supported the concept of uniquely identifying dogs. From the use of tattoos through to introduction regulations for compulsory microchipping of all dogs both owned and bred by our members many years before the amendments to the Dog Act to mandated it.

We ensure compliance through our registration system. All puppies bred by Members must be registered and the system does not allow the registration of a puppy without a microchip number. An original microchip sticker has to be affixed to the registration application for each dog,

Dogs West, through the Dogs Australia National Business System, can trace any puppy bred by our Members back to the Breeder, so we support the ability to trace any puppy to its breeder.

Dogs West supports the ability of Local Government Rangers to have the ability to microchip dogs that are impounded and found not to have a microchip. We also support the upskilling of persons designated to implant microchips.

## 6 Dog and Cat Registrations

### Dogs West Position

Dogs West supports the proposed Centralised Registration System.

For the registry to be truly effective all dogs must be included. To exclude a class of dog such as remote areas will allow the opportunity for unscrupulous breeders to use this loophole.

We suggest that Dogs West Members be able to use their membership number as their DON.

### Recommendations

- That the ability to register a dog that lives at another address be maintained.
- That Dogs West financial Members be given dispensation from compulsory sterilisation of their dogs.
- That any registration renewal for the above dog/s would require the presentation of a current Membership Card of Dogs West applicable to the owner/s of the dog.

- That Dogs West will provide notification of any person who ceases to be a Member of Dogs West.
- That the Dogs West Membership number be the Dog Owner Number (*This would be permitted under section 13B(2) Regulations under section 54 may deal with any matter relating to dog owner numbers.....*)
- That the current Section 19 of the regulations (Refund of portion of registration fees for subsequently sterilised dogs) remain in place.
- That all classes of dog be included in the CRS.
- That the CRS provide a facility for the update of microchip details.
- That bulk registrations of dogs under a kennel permit be facilitated under the Central Registration system.
- That Dogs West Members be recognised in regard to the number of dogs usually resident at prescribed premises, as is allowed under the Cat (Uniform Local Provisions) Regulations 2013 which states:
  - *7. Limits on number of cats kept at certain premises If a member of a cat organisation is ordinarily resident at prescribed premises, the number of cats that may be kept at the premises is 3 times the number of cats that could be kept at the premises under the local law that applies to the premises.*

## Commentary

### 6.1 Local Governments to keep record of registered dogs

Dogs West supports the Registration of dogs and the concept of the Central Registry. We see the benefits that can flow from such a system for Local Government, but are unaware of any cost impositions that may flow onto Local Government by the introduction of such a system.

Dogs can be owned by one person, and the dog registration paid by them, but live at an address different to the dog paying for the registration. This can occur for Dogs West Members who have an agreement with a person to have a dog that may return to them for breeding at some stage. This dog would be required to remain unsterilised, hence would need to be a dog registered by the Dogs West Member.

Under the current Regulations the ability to own and register a dog living at another address is in place and should remain.

Dogs West understands that exemptions for Dogs West Members would be dependent on a Member having a current financial membership with Dogs West. Memberships are renewed annually and any new Regulations could propose that Dogs West recognition be incumbent on advice regarding changes in an Membership status.

### 6.2 Dog Owner Number

Dogs West members are bound currently to include their membership number when advertising puppies (Dogs Australia Regulations)

- *It is mandatory for a Dogs Australia Member Body Membership Number to be displayed on any advertisement for dogs whatever the media and all members must include the following wording in their advertisements: "Please contact Dogs [insert State/Territory] on email: [insert email address] to verify my membership". (Amended 10/17, 6.1) .*

Having to advertise 2 numbers, the DON and Dogs West Membership number, will cause confusion. At the least, the CRS should be able to hold the Dogs West Member number which will assist transparency and enable easier interaction between Dogs West and queries from Local Government using the Central Register.

#### 6.4 Registration Certificate, and

#### 7.8 Licensing of approved kennel establishments

These matters are somewhat interlinked.

Dogs West notes in the commentary at 7.8 that it is not proposed to include kennel establishments in the CRS currently.

The City of Gosnells manages a number of kennel establishments within their district, and the kennel renewal process includes the individual identification and registration of all dogs within that kennel, except in the case of boarding kennels where dogs in for boarding are not included.

The Registration process allows for the bulk registration of the permitted number of dogs under the kennel license, and tags are issued for these dogs.

There is nothing in the consultation paper which addresses this process.

The process may be different for other Local Governments who have gazette kennel areas.

#### Dog numbers kept at premises

It is noted that under the Cat (Uniform Local Provisions) Regulations 2013 it is stated:

*7. Limits on number of cats kept at certain premises If a member of a cat organisation is ordinarily resident at prescribed premises, the number of cats that may be kept at the premises is 3 times the number of cats that could be kept at the premises under the local law that applies to the premises.*

If this consideration is being to Cat owners who belong to a Cat Organisation, the same consideration should be given to Dog owners who belong to Dogs West.

It is assumed that consideration has been given to Cat owners given they are governed by an organisation who has the same concern regarding the welfare of cats as Dogs West does in relation to the breeding and keeping of dogs.

It is not fair or equitable to allow one ownership cohort privileges denied to another.

## 7 Miscellaneous

### Dogs West Position

Dogs West supports the concept of a Centralised Registration System for the purpose of assisting in the care and welfare management of animals.

We seek assurance that the information contained within the CRS will be securely held and access will be based upon legal necessity only.

Dog and puppy theft is real and is often reported to Police and seen on social media. The Central Register should not provide any information to the general public which is not authorised by the owner of the information, i.e. the breeder or dog owner.

### Recommendations

- That access to the information by non-governmental parties is restricted and any such access is controlled.
- That access to the CRS by governmental agencies is for purposes relating to the care and management of animals only.
- That the Central Registry not be used for other purposes, such as identity checking.

### Commentary

#### 7.1 Establishment and maintenance of the Centralised Registration System

We support the intent of dogs being registered however have concerns over the development of a registry which may be available to third parties.

Until the scope and use of the proposed central registry is known Dogs West have concerns on access. The basic principles of privacy and a valid reason for need to know must be applied to any party being considered for access.

We understand the Registry is still under development. There is no guarantee that the maintenance of, and the assurance of the accuracy and consistency of data over its entire life-cycle is safe for Dog Owners.

The Government has not quantified the design, implementation and usage of such a Centralised Registration System and how it intends to store, process, or retrieve data. We would seek assurances that access to the information by non-governmental parties is restricted.

*There is a potential for community distrust of centralised information being held by Government and the possibility for misuse – “The number of Australians choosing to opt out of My Health Record could run into the millions, as criticisms of the scheme continue to mount...”*  
*Sydney Morning Herald – 24 July 2018*

#### 7.8 Licensing of approved kennel establishments

See page 20 under 6.4



## Appendix A: Definitions of Types of Dog Breeders

	Puppy Farmer	Backyard Breeder	Hobby Breeder	Commercial Breeder	Dogs Aust   Dogs West Breeder
<b>Motivation for breeding</b>	Purely by profit	Accidental matings, Profit, False belief "a bitch needs a litter to develop) or simply "for the kids to see a new born puppy"	They have a bitch or breeding pair of dogs and want a puppy for themselves or a friend	Purely by profit	Generally because they need a younger dog to go with and for the betterment of the breed
<b>Choice of breeding stock</b>	Whatever is available	Whatever is in the yard or what they can get hold of at little cost	Dogs of good substance but not always pedigreed	Dogs of good substance and of a breed or cross breed that has a ready market	Pedigreed dogs selected for health, temperament, longevity and breed type and/or performance
<b>Activities with breeding dogs</b>	Breeding	Generally a pet for breeding	Possibly conformation showing or performance activities	Breeding	Conformation showing or performance activities
<b>Care of breeding dogs</b>	Whatever is cheap? Dogs do not receive individual exercise or attention. Dogs that can no longer reproduce are euthanized.	Same as a normal backyard pet but with minimal care and attention	Vet care and special diet for bitch. Dogs may be rehomed to good pet homes.	Generally good basic care as a healthy breeding bitch produces more puppies	Best care available for stud dog and bitches. All dogs receive regular exercise and individual attention. Dogs may be rehomed to good homes.
<b>Number of breeding dogs</b>	Many and generally over stocked	Generally only 1 or 2 breeding dogs	Generally only 1 or 2 breeding dogs	Many however are generally well managed	Can have a number however generally enough to continue their chosen activity whilst breeding
<b>Whelping practices</b>	Bitches often whelp unsupervised. Pups generally whelped in sheds	Often unsupervised in back yard or home	Under supervision in home	Under supervision in a whelping area suitable for multiple litters	Under supervision in home with vet on standby if required.
<b>Are puppies socialised before sale</b>	Not at all unless in communal whelping areas	With family dogs and members	With family dogs and members	Not at all unless in communal whelping areas	As extensively as possible with strangers, reliable dogs and family members. Socialisation inside to life in a house is conducted.
<b>Are puppies temperaments assessed before sale</b>	No	Little knowledge of testing	Little knowledge of testing	No	Always with family and friends
<b>Cross breeding</b>	Yes, particularly with designer breeds	Yes	No	Yes, particularly with designer breeds	Most definitely not
<b>Breed association members</b>	Not Generally	No	Yes	Yes to gain sales through breed registries and to add credence	Yes

Health testing of breeding stock	No	No	Sometimes	No	Yes where health issues are identified in a breed
Sells to pet resellers	Yes	Yes	Not Normally	Yes	No
How often are puppies available	Always	Occasionally	Occasionally	Always	Occasionally
Age puppies are sold	7 weeks	7 weeks	8 weeks	7 weeks	Not before 8 weeks but often older
Puppies are registered with Dogs Aust or other recognised body	No	No	Generally	Yes as it adds to the asking price	Yes
Are prospective buyers carefully interviews	No	No	Usually	No	Yes
Provide a guarantee on the puppies health	No	No	Generally	No	Yes

**Dogs Australia | Dogs West Breeder** – A person who breeds for the betterment of the breeds and actively participates in organised canine activities. These are generally the custodians of the breed and often are prepared to impart their knowledge to others in the breed or wanting to learn about it.

**Commercial Breeder** – is an organisation where the primary income is the breeding and selling of dogs. They generally care for the dogs and have well planned and developed facilities. May be a member of a breed organisation but only to give their business credibility.

**Hobby Breeder** – A person who may be a member of a breed organisation but will generally have a litter as they would like another dog of their own breeding.

**Backyard Breeder** – Generally a family which has a couple of bitches and breeds them to assist in the family income. Have limited knowledge of breeding and required veterinary care required.

**Puppy Farmer** – is a person or organisation which breeds puppies solely for profit with little care or responsibility for the health and wellbeing of the adults or offspring.