



**Submission
to
Department of Primary Industries
and Regional Development**

**Health and Welfare of Dogs
Standards & Guidelines**

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Who are Dogs West?

Our Origins

We believe all dogs deserve responsible owners

Our origins trace back to the 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.

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 Inc 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 pedigreed dogs
- To foster promote and protect the interests 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.

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 quality 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 across all age groups, 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 that interest.

Dogs West Member Affiliates

There are sixty Clubs affiliated with Dogs West including breed clubs, all breeds clubs, agility, training and obedience clubs, luring 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 also take place in country centres like Geraldton, Bunbury and Albany, as well as across the metropolitan area.

Many 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, a club dedicated to the sport of Tracking runs events 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.

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. Many breed clubs such as The German Shepherd Dog Association of WA and the Doberman Club of WA also require their members to positively identify all puppies born by means of a tattoo.

The ANKC 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 a worldwide pure-bred dog community

Dogs West is a Member Body of the Australian National Kennel Council (ANKC), 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 the ANKC.

The total membership of all ANKC Affiliates is around 33,000. The ANKC 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 International (FCI) – the largest canine association in the world with 95 Affiliated Countries and 1.7 million members. Please refer to Appendix A: What it means to be part of the FCI community.

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.

ANKC affiliates contribute financially to research in Australia promoting the health and well-being of all dogs and also 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 all our Members, including those in later years, and provides opportunities for younger members of the community to take part in many activities.

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.

With more than one hundred years of experience and expertise in canine husbandry we look forward to being of service to improve on the welfare of dogs.

During the Stop Puppy Farming 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.

Standards and Guidelines

Dogs West Position

- Dogs West supports proper standards for dog health and welfare
- Dogs West supports sensible guidelines to assist all dog owners
- Dogs West will actively promote and educate dog owners on changes to any legislation which affects the management of dogs
- Dogs West believes that Dogs West Breeders should be allowed up to 10 breeding bitches, as they already comply with many of the proposed Standards, many of which are already Dogs West and ANKC Regulations
- Dogs West is unclear how the concept of a domestic dog operation fits in with the public consultation that was held on Stop Puppy Farming which mooted the concept of everyone who owned an entire dog being a “registered breeder”

Recommendations

- There are numerous recommendations and comment made within this response.

Dogs West supports the health and welfare of all dogs

Dogs West supports the intention of the Draft Standards and Guidelines for the Health and Welfare of dogs in Western Australia.

All dogs should have proper care for their lifetime.

Dogs West has a Constitution, Code of Ethics and Regulations which must be adhered to by our Members and Dogs West has a strong governance framework which deal with breaches.

We note the strong links between this consultation paper for the Health and Welfare of Dogs by the suggested Standards and Guidelines with the objectives of the Stop Puppy Farming project.

The **DLGSCI Consultation Paper** on Stop Puppy Farming stated “Currently the difficulty in identifying puppy farmers hinders the enforcement of relevant legislation against puppy farmers”. To this end this project is aimed at PUPPY FARMERS or people who:

- are driven solely by profit
- keep dogs in substandard conditions
- do not provide veterinary care for dogs
- do not meet the mental health ideals for companion dogs
- leave whelping bitches unsupervised for long periods
- are not members of ANKC
- do not comply with any regulations or laws

We understand that the aim of the Health and Welfare Standards &



Guidelines is to have a legislative framework adopted which will enable enforcement action against those who do not provide adequate care of dogs.

However, there is the constant message that there are too many dogs being bred.

The breeding statistics from the last 10 years for Dogs West Members clearly show there has been NO increase.

No Legislation should impinge on the rights of a person to own a companion animal, when that animal receives appropriate care.

Part 2 - General Care of dogs

Section 1 - General

1 Identification of dogs

Dogs West Position

Dogs West supports many of the standards and guidelines as put forward in the consultation paper in Section 1, and recommends the following.

Recommendations

- That ear tattooing be allowed by Dogs West Members for the identification of dogs.
- That Dogs West be recognised as having an established ear tattoo identification scheme.
- That Guideline G2.2 should be a Standard
- That Guideline G2.5 include microchip information as required under the WA Dog Act
- That Guideline G2.6 be amended to recognise that not all puppies are transferred by 12 weeks of age

1.1 S1.3 Ear Tattoo

An Ear tattoo has been an accepted method of positively identifying a dog for decades. It is used to identify the breeder of a dog.

This is done by breeders and breed clubs as microchips have proven they are not infallible as they can fail, and can move within a dog and are not always detected.

Not all owners keep the microchip details of their dog up to date. Ear tattoos have seen dogs with failed microchips being reunited with their owners.

An ear tattoo is done at between 5 and 7 weeks age, takes seconds, causes no more discomfort than the injection of a microchip, and does not require a general anaesthetic.

Clubs have been tattooing since the 1980's and there are documented procedures for the procedure.

2 Transfer of ownership

2.1 G2.2 Dogs West believes that this Guideline should be a Standard.

No puppy should be raised, much less transferred to a new owner, without having been regularly treated for internal parasites.

Puppies and adult dogs, must be regularly treated for internal parasites, which can affect both dog and human health, as noted in Guideline G7.10.

Puppies must be vaccinated in accordance with the recommendations of the Veterinary Association, before they are transferred to a new owner.

2.2 G2.5 Information to new owners

There is no mention in this guideline of the requirement to provide microchip information to the new owner, along with vaccination and other details.

The Guideline should also state that the update of the ownership details for the microchip be processed, or information provided to the new owner on how to do this.

The Dog Act of WA requires that transfer of microchip information be made by the seller within 7 days of sale.

No dog can be registered with a Local Government authority without microchip details.

2.3 G2.6 Age of transfer to a new home

Dogs West understand that this is a guideline.

Dogs West does not disagree with the overall sentiment, but it does not always happen within that timeframe for many reasons, examples are:

- Breeders may keep puppies beyond 12 weeks while deciding which to keep
- Buyers change their mind and a puppy needs to wait for a new companion home
- Some people seeking a new companion actually want an older puppy or young adult

Whilst animal behaviourists may recommend this timeframe it is not always possible, and many dogs are rehomed many months and sometimes later as an adult, very successfully.

Section 2 – Housing and Transport

3 Minimum Housing Conditions

Dogs West Position

Dogs West supports the intent of the Minimum Housing Conditions Standards and Guidelines.

Any dog should be securely housed, have access to shelter from the elements, and be kept in an area or enclosure suitable for the size of the dog.

We recognize that the vast majority of dogs are companion animals, many sharing the homes of their owners.

Many Dogs West Members also live with their dogs in domestic circumstances.

Where dogs are kept in enclosures, or kennels, then these must be adequate for the health and welfare of the dog, whether they be in breeding or boarding establishments of any size.

Recommendations

- That Guideline G3.4 should be a Standard.
- That Guideline G3.9 should be a Standard

3.1 G3.4 Lighting should be as close as possible to natural conditions

Dogs West does not believe that lighting should be excessive or extend far beyond natural daylight hours, whenever possible.

3.2 G3.9 Incompatible dogs should not be housed together

This should be a Standard to minimize risk of injury to any dog.

4 Crating of dogs

Dogs West Position

Dogs West supports the intention of the Standard and Guideline.

Dogs may be crated at times, for a number of reasons, and many dogs use a crate as a place of security, when trained from a young age.

Many dogs sleep in crates with the door open as a matter of choice.

Many breeders crate train puppies from an early age, so that new owners can transport their dogs in safety in crates, and crate them without causing distress when circumstances may require it to occur.

Dogs West does not support the crating of dogs for any excessive length of time.

Recommendations

- Nil

5 Tethering of dogs

Dogs West Position

Dogs West supports the intention of the Standard and Guideline to ensure the welfare of any dog that is tethered.

Recommendations

- Dogs West does not support the tethering of dogs unless it is for a short period of time, or if the dog is under regular supervision.

6 Transport of dogs

Dogs West Position

Dogs West supports the intention of the Standard and Guideline to ensure the welfare of any dog that is being transported.

Recommendations

- That G6.1 should be a Standard
- G6.7 This guideline attracted media criticism and comment and should be reworded to remove the second sentence:
For example, drivers should drive with care and try to minimise bumps, jolts and swerving during the journey.
- G6.5 Air travel noise – this is inherently noisy
- That G6.8 should be a Standard
- That G6.9 should be a Standard if transport companies must comply

6.1 G6.1 Non-slip and insulated matting on metal surfaces

For the safety and comfort of dogs carried in this manner, the provision of matting should be a Standard.

6.2 G6.5 Aircraft travel

Dogs travel regularly by aircraft, along with other domestic animals. Airport operations are inherently noisy. Loading areas are secure and sheltered, but could not be termed quiet.

6.3 G6.7 Car travel

Drivers must obey the rules of the road, and drive with care.

The majority of dogs are companion animals who are transported for all sorts of reasons, including sharing in the activities of their owners.

It is simply not possible to avoid speed humps, unsealed roads, potholes and the like.

Indeed, many owners take their dogs with them when travelling off-road, as would farmers with working dogs.

Nor is it possible for commercial travel agents to avoid every road hazard , bump or swerve when driving.

6.4 G6.8 Restraint during transport

For the safety of the dog, and for others travelling in a vehicle, we believe that dogs should be effectively restrained while travelling.

6.5 G6.9 Live Animal Regulations

If carriers are required to comply to these International Air Transport Association Regulations, should not the Guideline in fact be a Standard?

Section 3 – Health and husbandry

7 Health and veterinary care

Dogs West Position

- Dogs West supports appropriate standards for the health and husbandry of dogs

Recommendations

- That S7.3 be updated to include G7.8:

Dogs should be vaccinated in accordance with veterinary recommendations, based on consideration of the individual dog's circumstances, including age and health state, location and likely contact with other dogs and animals.

7.1 S7.3 Vaccination

This standard should be amended to include the requirements of G7.8 for vaccination.

All dogs should be vaccinated, when it is possible.

Revaccination should not be required where a Titer test has shown that it is not required.

8 Food and water

Dogs West Position

- Dogs West supports these standards

Recommendations

- That G8.8 be amended to allow for puppies to be fed together under supervision until 10 weeks of age

8.1 G8.8 One container for each weaned puppy

There is no age timeframe on this guideline for puppies.

Recently weaned puppies are often fed from a round bowl with a raised centre. These bowls allow each puppy to feed within their own space while encouraging interest in the food, and can often continue for a number of weeks, dependent on the breed.



9 Body Condition

Dogs West Position

- Dogs West supports the standards and guidelines as outlined in this section.

Recommendations

- That these Standards and Guidelines be adopted.

10 Behaviour and training

Dogs West Position

- Dogs West broadly supports these standards and guidelines and recognises the social and enrichment needs of dogs.
- Dogs West supports enrichment activities and many training sessions are held by Clubs and experienced private trainers at the Dogs West centre.
- Many activities are on offer at Dogs West for owners to pursue with their dogs, with obedience and agility classes and events attracting many owners.

Recommendations

- That Guideline G10.2 be a Standard
- That Guideline G10.9 be removed

10.1 G10.2 Rewards based training

This Guideline should be a standard after S10.2, or be included as part of the Standard which states that training must cause no harm.

Rewards based training is about positive reinforcement, something to be encouraged at any level of training.

10.2 G10.9 Minimisation of unpleasant environmental stimuli

This Guideline is impossible to follow.

No-one has control over thunderstorms. While many dogs take little or no notice of storm noise, some dogs do not like them.

Similarly, there is often no way to exclude dogs from the sound of heavy machinery. A new home, road works or land development nearby, for example, are not under the control of a dog owner.

Many dogs join their owners in a workplace, which may be noisy.

Fireworks are approved by relevant authorities and can often be heard from a great distance.

A dog owner has no control over such matters, and can only manage their dogs accordingly.

11 Exercise

Dogs West Position

- Dogs West supports these standards and guidelines
- All dogs should be able to exercise according to their individual needs and circumstances.
- All dogs should have the opportunity to be out of doors on a daily basis, particularly to have exposure to sunlight.

Recommendations

- That G11.5 be a Standard

11.1 G11.5 A dog using exercise equipment, such as treadmills and therapy pools, should be supervised at all times

Dogs West believes that a dog should not be left unsupervised on any exercise equipment, or in any pool. Any pool should provide easy egress for a dog.

12 Restraint

Dogs West Position

- Dogs West broadly supports these standards and guidelines
- That harnesses be only used when dogs are exercising and not left on.
- Muzzles should never be used for punishment.
- Slip leads or collars are a carefully used "restraint" by many experienced Dogs West members and are an effective and humane method of controlling a dog.

Recommendations

- That Guideline G12.4 become a Standard
- That Guideline G12.5 become a Standard

12.1 G12.4 A harness should not be left on a dog continuously, unless under veterinary care

There are numerous reports, seen on social media, of the pitfalls of harnesses being used incorrectly, and being left on dogs and causing significant injury, particularly from being too tight or being caught on something.

Harnesses should fit the dog correctly, be used during exercise in place of a collar and lead, and then removed when the exercise is finished. They should not be left on a dog.

12.2 G12.5 A muzzle should not be used for the purpose of punishment

We believe that this should be a Standard, not just a Guideline.

13 Electronic collars

Dogs West Position

- Dogs West broadly supports these standards and guidelines
- Dogs West understands that the use of electronic collars has a wide range of views across the community
- Dogs West believes that the proposed Standards and Guidelines are appropriate in this regard.

Recommendations

- That the guidelines and standards be adopted.

13.1 Minimum Standards: Electronic collars

Dogs West supports the appropriate use of electronic collars, where effort has been made using other methods to modify behaviour, and when these have failed.

Barking is one of the most common complaints handled by Local Government on a regular basis. The judicious use of an electronic collar has often produced a positive reduction in this unwanted behaviour in dogs who have not responded to other training methods.

These collars are often used as a last resort to avoid euthanasia.

14 Euthanasia

Dogs West Position

- Dogs West strongly supports the Objective as stated
 - *To ensure that dogs are afforded a humane death, without pain, suffering or distress.*
- Dogs West supports these standards and guidelines

Recommendations

- That G14.1 become a standard

G14.1 The euthanasia or humane killing of a dog should not be carried out in view of any other animals

Dogs West recommends that G14.1 become Standard S14.5 and have an amendment to add the words “whenever possible” so that it reads”

S14.5 The euthanasia or humane killing of a dog should not be carried out in view of any other animals, whenever possible.

Section 4 – Breeding

15 Breeding of dogs

Dogs West breeders are breed preservationists

The protection of the pure bred dog, their welfare, care and future, is at the core of our Association.

Our 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.

Many of our Standards have been included in these Draft Standards and Guidelines now proposed by Government.

The responsibility of breeding good quality dogs that are sound in mind and body, and are raised with care, is one that Dogs West breeders take very seriously.

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, such as hip scores, or mating dogs that carry specific genes, e.g. merle
- 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, stated by Lisa Baker MLA, during the Stop Puppy Farming consultation process.

We are successful in this area yet we recognise that our Rules and Regulations and our Code of Ethics must remain current and relevant. To that end we regularly review and update our Regulations to both strengthen and simplify them.

Government already has existing legislation that has not been sufficiently enforced.



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**

Dogs West Position

- Dogs West already has in place robust Regulations covering dog breeding and sale
- Many of the Standards put forward in this consultation are Dogs West Regulations
- Standards need to take into consideration the broad diversity of dog ownership, such as dogs in companion homes, hobby breeders, kennel establishments, boarding kennels, training facilities, working dogs, assistance dogs.
- Standards should also take into consideration size, temperament and phenotype of dogs.

Recommendations

- That S15.1(c) be removed or reviewed to lower the age limit
- That S15.5(b) be amended to reflect that a stand can be used when it is for the benefit of the dog
- That G15.4(a) be removed
- That G15.5 not recommend early age desexing
- That G15.9 not become a Standard
- That G15.14 become a Standard

15.1 S15.1(c) A male dog must be 12 months old

Unless there is scientific evidence that points to the welfare of a male dog not breeding until it is 12 months old, this should be removed **or lowered to 9 months**.

It is true that breeds grow and mature at different rates, according to the characteristics of their breed.

Many dogs currently sire litters before they reach twelve months of age.

What is the reasoning behind this age limit?

15.2 S15.5(b) a dog breeding stand is not used

We are unsure of the reasoning behind this standard.

Breeding supports are sometimes used to protect the male dog from injury and also to support the female dog.

This is no different from a controlled mating where people support dogs.

Free running is not always in the interests of the stud dog in particular, as this can lead to herniation if the bitch not confined.

The great majority of dog matings require no physical intervention by handlers.

Dog West recommends that the wording be changed to reflect that it be only used when there is a benefit for the dogs.

15.3 G15.4(a) A bitch over 5 years should not be mated for the first time

Unless there is scientific evidence to support the view that a bitch of 5 years or more should not be mated, this part of Guideline G15.4 should be removed.

There is no evidence to support the notion that a five year old bitch is caused any harm by being mated for the first time at this age.

In many breeds, a 5 year old bitch is considered to be in her prime, fully mature, both mentally and physically.

There is no reasoning to support this Guideline.

15.4 G15.5 Early desexing for dogs displaying poor temperament

We agree that dogs displaying poor temperament should not be bred from.

For the health and welfare of dogs we do not support early desexing.

15.5 G15.9 A dog should not be mated with a second degree relative.

This appears in the consultation paper as a guideline.

If it were to become a Standard then it would be a danger to less common breeds.

Dogs West breeders are preservation breeders, working to ensure the preservation of their breed of choice. When a breed is uncommon, or low in numbers, sometimes these matings are used.

Dog breeds vulnerable to extinction – a shrinking gene pool

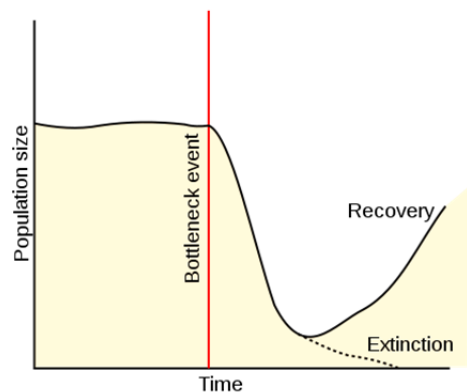
In November 13, 2013 a report was produced “Dog Breeds Vulnerable to Extinction in the United States”. 10 dog breeds account for half of American Kennel Club (AKC) registrations while others near extinction. According to calculations the 50 rarest breeds (those that have the lowest registration numbers) in the AKC, account for only 1.2 percent of all of all of the dogs in the American Kennel Club Registry. To give you an idea of what that means let's suppose that we gathered together 1,000 dogs, all of which were purebred, and all of which were registered in the AKC. In that group of 1,000 dogs just 12 AKC registered dogs would come from any of the 50 breeds listed here.

- Affenpinscher
- American Foxhound
- American Water Spaniel
- Australian Terrier
- Beauceron
- Bedlington Terrier
- Black Russian Terrier
- Bluetick Coonhound
- Boykin Spaniel
- Briard
- Canaan Dog
- Clumber Spaniel
- Curly-Coated Retriever
- Dandie Dinmont Terrier
- English Foxhound
- English Toy Spaniel
- Field Spaniel
- Finnish Spitz
- German Pinscher
- Glen of Imaal Terrier
- Greyhound
- Harrier
- Ibizan Hound
- Irish Red and White Setter
- Irish Terrier
- Lakeland Terrier
- Lowchen
- Manchester Terrier
- Miniature Bull Terrier
- Norwegian Buhund
- Otterhound
- Petit Basset Griffon Vendeen
- Irish Water Spaniel
- Kerry Blue Terrier
- Komondor
- Kuvasz
- Pharaoh Hound
- Plott
- Polish Lowland Sheepdog
- Pulik
- Pyrenean Shepherd
- Redbone Coonhound
- Scottish Deerhound
- Sealyham Terrier
- Skye Terrier
- Spinoni Italiani
- Sussex Spaniel
- Swedish Vallhund
- Tibetan Mastiff
- Welsh Springer Spaniel

Similar statistics impact on vulnerable breeds in the United Kingdom and Australia.

A population bottleneck is an event that drastically reduces the size of a population. The bottleneck may be caused by various events, in this instance low breeder rates that results in the deaths of certain breeds.

Perth is the most isolated capital city in the world. To be able to maintain a healthy and diverse gene pool Breeders need access to potential breeding stock which may be, on occasion, a close relative.



15.6 G15.14 Bitches to be up to date with vaccinations and worming treatments

We believe that this should be a Standard, not just a Guideline.

This would then fall into line with the requirements for all dogs to be up to date with Vaccinations under Standard S7.3, and our recommendation for that Standard.

Any bitch should be in good health before mating and this includes vaccinations and worming.

16 Whelping and care of puppies

Dogs West Position

- Dogs West supports the Standards and Guidelines as proposed.
- G16.6

Recommendations

- That G16.3 be amended.

16.1 G16.3 A lactating dam should have access to food at all times.

This is not considered to be the best way to feed a lactating bitch. Spaced interval feeding meals is considered to be the benchmark method.

16.2 G16.6 Puppy socialisation program

There is no definition of what an appropriate puppy socialisation program is.

Part 3 – Additional Requirements for domestic dog operations

Section 1 – Introduction

In the consultation paper, a **domestic dog operation** is a person who owns five or more fertile bitches that are kept for the purpose of breeding and selling dogs.

The Establishment where dogs are kept can be private homes, small kennels or large commercial premises.

Dogs West Position

- As the peak body for pure bred dogs in WA, Dogs West considers the number of 5 fertile bitches to be too low
- **There is no clarification on or understanding of how the concept of a Domestic Dog Operation will fit into the proposed Stop Puppy Farming legislation, and the concept of a “Registered Breeder” under that proposal.**
- **There is no understanding of how a Domestic Dog Operation would fit with other Legislation, such as the Dog Act, or with Local Government Local Laws.**
- Dogs West understands and supports the need to ensure that all dogs in any establishment/s of any size are correctly managed.
- The concept of a Domestic Dog Operation appears to be a broad brush approach, making no distinction between a small hobby breeder, a breed preservationist, or a large commercial breeding or boarding operation.
- **Clearly they are different.**

Recommendations

- That Dogs West Members be permitted up to 10 fertile bitches before being classified as a Domestic Dog Operation.

Domestic Dog Operation

- Dogs West questions how the number of 5 fertile bitches has been determined and what wider implications this classification may have outside Health and Welfare of Dogs.
- The Guideline does not stipulate if the number of fertile bitches only applies to those bitches between the breeding ages of 12 months and 7 years
- Other States, whose legislation has been reviewed under this process, have put into place standards for the breeding of dogs which are more than 5:
 - In Victoria the standards are:
 - A Recreation Breeder has 11 or less
 - A Commercial Breeder has more than 11
 - In South Australia it is based on the number of pregnant or lactating bitches at any given time:
 - Small facility – under 6 lactating dogs or cats and under 29 capacity
 - Large facility – over 6 lactating at any one time and over 30 capacity
 - In Queensland a petition to Government is asking that current legislation be amended in that state:

- For a limit of the number of breeding bitches to be implemented and that it be 10
 - In NSW last year proposed standards and guidelines were withdrawn after a backlash against the proposed restrictions that were to apply. New proposals have yet to be tabled.
 - In Tasmania, the Animal Welfare (Dogs) Regulation 2016 has Regulations which closely align to many of the proposed Standards and Guidelines within this consultation process – but it does not stipulate any number of breeding bitches
- The proposed number of 5 is unreasonable for a Dogs West breed preservationist wishing to maintain a healthy gene pool
- Some breeders are custodians of more than one breed – is the number of 5 specific to one or many breeds?
- Bitches may be entire, but may only be bred once or twice in their lifetime during the allowed breeding ages from 12 months of age to 7 years
- Bitches that are no longer bred are often retained and kept entire, as scientific evidence mounts that sterilising dogs is not always in the best interest of the dog

The consultation paper mentions Small Domestic Dog Businesses, and Larger Businesses. What are the limitations for a larger business?

This is a 'one size fits all' category – it allows for no distinction between small hobby breeder, breed preservationists and a larger commercial breeder. It does not distinguish between boarding kennels and commercial breeding.

Dog ownership in Western Australia

It is often said that too many dogs are being bred.

The question is, who is breeding them.

As reported by the 2016 Census, Western Australia had over 1 million private dwellings with over 644,000 families, 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.

Table 2 below clearly shows that Dogs West Breeders are NOT contributing to the perceived oversupply of dogs. Dogs West breeders produced approximately 13% of the puppies notionally required.



Limiting the number of fertile bitches allowed by Dogs West Members is going to further impact on the ability of caring owners to source a companion animal.

It is fundamental to the ongoing health of pure bred dogs that a healthy and wide gene pool of dogs be available for breeding.

As shown by the breeding tables below, both for Western Australia and Australia wide, the breeding of pure bred dogs has not increased significantly over time. Indeed, the national total has fallen over the past 3 years.

Some puppies will be sourced from ANKC 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 do recognise that not all purchasers are looking to buy a pure bred dog or puppy, but fail to see how impinging on our Members is going to assist to reduce the number of dogs that are not cared for correctly.

Availability of well-bred dogs as companion animals

We have ongoing feedback from Members that they cannot meet demand for purebred dogs.

This proposal will exacerbate this issue because Members may be forced to reduce numbers in their breeding programs as a result of the definition of a domestic dog operation, when that definition may be aligned to Stop Puppy Farming legislation to restrict the breeding of dogs.

Our own research during the Stop Puppy Farming consultation revealed that dogs and puppies are regularly shipped into Western Australia to meet the demand for companion animals.

Limiting the number of fertile bitches, may increase the numbers of dogs being shipped in, and ‘cleanskin’ dogs being moved from state to state for breeding.

In addition to increasing the illegal breeding activities of PUPPY FARMERS, reduced supply will inevitably lead to an increase in the price of puppies.

An ANKC study undertaken in 2015 clearly showed that the vast majority of dogs were sourced from other than ANKC registered breeders. Figures on dog registrations from Dogs West and ANKC are:

Table 1 – ANKC National Breeding Statistics

2010	2011	2012	2013	2014	2015	2016	2017	2018
66,040	63,465	64,224	66,904	69,274	70,130	71,199	70,524	69,336

Table 2 – Dogs West Breeding Statistics

2010	2011	2012	2013	2014	2015	2016	2017	2018
4,840	4,796	3,295	5,099	4,208	5,370	6,046	5,885	6,003

Some puppies will be sourced from ANKC 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.

Exemptions for recognised organisations

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

Dogs West, a not for profit affiliate of the ANKC, is the only organisation in Western Australia which meets such criteria.

We have a physical presence, unlike some other dog “registries” which are commercial online entities only.

Our Governing Council makes transparent decisions on how the body is managed, its culture, its policies and strategies, and the way it interacts with various stakeholders. Strong and ethical leadership from Governing Councils is essential for Dogs West to uphold their reputation within our community.

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

Dogs West Members must have greater consideration given to the number of fertile bitches allowed, as adopted in other States.

Section 2 – Administrative requirements

17 Business practices

The responsibility of breeding good quality dogs that are sound in mind and body, and are raised with care, is one that Dogs West breeders take very seriously.

Dogs West Position

- Many of the standards are already the Regulations that apply to Dogs West members
- Dogs West Members are required to keep records on all breeding matters
- Dogs West would have to provide assistance and expertise to Members who, owning 5 fertile bitches, would be required to develop complex Dog Health Management and Emergency Management Plans.
- The requirement of a Dog Health Management Plan and an Emergency Management Plan for someone owning 5 dogs appears excessive.
- For commercial operations or large facilities, these plans may apply.

Recommendations

- That if a Dog Health Management plan becomes compulsory for the owners of 5 fertile bitches, that the Government provide resources and skills to assist people running a “Domestic Dog Operation” to comply.

Section 3 – Housing requirements

18 Minimum housing conditions

Dogs West supports Standards that ensure that dogs are adequately housed and cared for at all times.

We note that many of the standards and guidelines apply to larger commercial operations, and not those that would apply to a hobby breeder, who may be keeping dogs in a home environment.

Any enclosure for a dog should give space for a dog to sleep and to move around defecate away from the sleeping area.

Any enclosure should be capable of being kept clean.

Dogs West Position

- Dogs West supports the Standards and Guidelines for housing conditions.
- Dogs West has concerns over the minimum sizes as proposed in Appendix 1
- Some Local Governments already specify minimum sizes for kennels and may vary from those in Appendix 1
- Any enclosure should be capable of being kept clean, particularly in the sleeping area which should have impervious flooring

- Any commercial operation should have flooring throughout that is capable of being cleaned and disinfected when required

Recommendations

- That the minimum size for a single dog be 2m²
- That any sleeping area in an enclosure have an impervious floor capable of being cleaned
- That commercial operations have impervious flooring capable of being cleaned and disinfected
- That any enclosure provide space for a dog to move about.

19 Biosecurity and isolation areas

Dogs West Position

- Dogs West supports the Standards and Guidelines as proposed.

Recommendations

Nil

20 Transport

Dogs West Position

- Dogs West supports the proposed Standards and Guidelines as proposed.

Recommendations

- Nil

Section 4 – Health and husbandry requirements

21 Dog husbandry

Dogs West Position

- Dogs West supports the proposed Standards and Guidelines as proposed.
- We note that Standard S21.2 calls for noise minimisation. This is difficult as dogs are vocal, particularly before meal times and when activities occur in an establishment with numbers of dogs.
- The type of noise is not defined in the Standard

Recommendations

21.1 S21.2 Minimisation of excessive noise

That this standard be more specific about noise – it does not stipulate the type of noise.

Dogs are vocal, particularly before meal times and when activities occur in an establishment with numbers of dogs, such as visitors, dogs coming into and leaving a premise.

This is normal dog behaviour.



22 Food and water

Dogs West Position

- Dogs West supports the Standards and Guidelines as proposed.

Recommendations

All food should be hygienically stored, prepared and presented no matter the number of dogs being cared for.

It is unreasonable to expect that every meal for every dog is to be recorded on a daily basis where it may apply to someone who owns 5 dogs.

23 Exercise

Dogs West Position

- Dogs West supports the Standards and Guidelines as proposed.

Recommendations

Nil

24 Whelping and care of puppies

Dogs West Position

- Dogs West supports the proposed Standards and Guidelines as proposed.

Recommendations

Nil

Appendices

Dogs West has referred to the following Appendices when responding to the Standards and Guidelines document, and has made comment and recommendations within each section, where appropriate.

Some Appendices are useful reference material for those involved in the breeding and management of dogs, but individual circumstances will apply.

Dogs West has generally made no comment on the requirements for commercial operators running boarding establishments, grooming businesses or travel operations.

Dogs West reiterates concern over the requirement to develop complex plans for people keeping small numbers of dogs.

Appendix 1 – Enclosure size and design

Appendix 2 – Managing dogs in hot weather

Appendix 3 – Feeding dogs- general considerations

Appendix 4 – Body condition scoring scale

Appendix 5 – Breeding dogs

Appendix 6 – Record keeping in a domestic dog operation

Appendix 7 – Health management plan

Appendix A: What it means to be part of the FCI community



- ✪ I am part of a dog-loving fellowship counting 94 national canine organisations
- ✪ I can take part, yearly, in more than 1,200 international dog shows
- ✪ I can take part, yearly, in more than 2,000 sporting events (working trials, sighthounds races, Obedience and Agility competitions, field trials, dog dancing contest and many more)
- ✪ I can access FCI information resources about dog-related issues of interest to me, such as health, breeding, breed standards, genealogies
- ✪ I have my own and unique kennel name registered with an international organisation
- ✪ My dogs have a chance to be judged by one of the 9,278 judges listed by FCI members
- ✪ Have a look at the following amazing FCI facts and figures:

2,057,228 puppies registered with the studbook and appendix
1,667,336 individual members



FCI: WE BELONG!

Appendix B: Definitions of Types of Dog Breeders

	Puppy Farmer	Backyard Breeder	Hobby Breeder	Commercial Breeder	ANKC Dogs West Breeder
Motivation for breeding	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
Choice of breeding stock	What ever is available	What ever 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
Activities with breeding dogs	Breeding	Generally a pet for breeding	Possibly conformation showing or performance activities	Breeding	Conformation showing or performance activities
Care of breeding dogs	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.
Number of breeding dogs	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
Whelping practices	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.
Are puppies socialised before sale	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.
Are puppies temperaments assessed before sale	No	Little knowledge of testing	Little knowledge of testing	No	Always with family and friends
Cross breeding	Yes, particularly with designer breeds	Yes	No	Yes, particularly with designer breeds	Most definitely not
Breed association members	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 ANKC or other recognised body	No	No	Generally	Yes as it adds to the asking price	Yes
Are prospective buyers carefully interviewed	No	No	Usually	No	Yes
Provide a guarantee on the puppies health	No	No	Generally	No	Yes

ANKC | 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.