

Draft Standards and Guidelines

Thank you for the opportunity to meet and discuss the above draft, and for allowing a short time extension to get our response to you.

As discussed on the day, please find following our particular comments to some items in the draft.

Part 1 - Preliminary

Domestic Dog Business

We are unclear what the ramifications are of a Domestic Dog Business classification, apart from Section 3 of the document applying.

Number of fertile bitches

We are unsure how this number has been decided when other States do not have a low limitation.

Five breeding bitches is too low and is much lower than other States – we believe the lowering of numbers will lead to less breeding and more puppies being bought in from large commercial establishments now setting up in the Eastern States.

As breed preservationists, Dogs West believes in our registered breeders having access to dogs to maintain genetic diversity and a healthy breeding pool of animals.

We also have breeders who maintain more than one breed.

Other States have recognised this.

- In Victoria the standards are:
 - Recreation Breeder has 11 or less
 - Commercial Breeder has more than 11
- In South Australia it is based on the number of pregnant or lactating bitches
 - 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

This is a 'one size fits all' category – it allows for no distinction between small hobby breeder and a larger commercial breeder, it does not distinguish between boarding kennels and commercial breeding, or those who are breeding a recognised "breed" as opposed to those breeding mixed breeds.

Interpretation

Surgical alteration procedure

This refers to ear cropping, debarking and dew claw removal.

Tail docking is banned and no dog can be shown or have their ears cropped under Dogs West Regulations.

Dew claw removal at a very early age is regularly performed in a number of breeds as a safety measure to protect dogs from injury from ingrown dew claws, and from leg tears when dew claws get caught. This is extremely painful for a dog.

We note that Dew Claws are not covered under S7.4 later in the document.

Part 2 General Care of Dogs

1. Identification of dogs

S1.3 Ear Tattoo

An Ear tattoo has been an accepted method of positively identifying a dog for decades.

This is still done by some breeders and breed clubs as microchips are not infallible and both fail and move and are not always detected. Ear tattoos have resulted in dogs with failed microchips being reunited with their owners.

This ear tattoo is done at 5-7 weeks age and is not done under a general anaesthetic. Breed Clubs have been tattooing since the 1980's. There are documented procedures for the procedure.

2. Transfer of ownership

G2.6 Puppies should go to a new home should be transferred between eight and twelve weeks of age.

We understand that this is a guideline.

We do not disagree with the overall sentiment, but it does not always happen within that timeframe for a myriad of reasons, such as:

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

8. Food and water

G8.8 When feeding dogs together, one food container should be provided for each dog and weaned puppy.

There is no age timeframe on this guideline for puppies – perhaps there should be.

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 until 12 weeks of age, dependent on the breed.



12. Restraint

G12.7 Choke chains can cause discomfort or pain if fitted incorrectly and should only be used on dogs under the guidance of a veterinarian or experienced dog trainer, and when other training techniques and other types of collars or harnesses have not been effective at achieving the desired behavioural change.

This could be read to imply that check chains are only used to modify behaviour, this is not their only function.

13. Electronic collars

G13.1 An electronic collar should not be left on an unsupervised dog.

Anti bark collars are often used when dogs are left outside while the owners are at work to stop complaints.

14. Euthanasia

S14.3 and G14.2 to be reworded so that they cannot be read as conflicting, as discussed.

Section 4 Breeding

S15.1 c

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**.

S15.1 e

Unless there is scientific evidence that points to the welfare of a male dog not being used over 7 years without veterinary approval, this should be removed.

Many stud dogs are not considered by responsible breeders until their progeny are of an age to assess their breed qualities, and any health issues with any progeny are evident or have been cleared by health testing.

There is no evidence, that we are aware, to suggest that a dog cannot be used under 12 months because it adversely affects the dogs, or that a dog of 7 years or more should not be used, provided that the dog is physically well.

S15.5 b a dog breeding stand is not used to confine the bitch for mating.

We understand the sentiment that may be behind this.

However. 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 particularly as could lead to herniation if bitch not confined.

We would like to see the wording changed in some way to reflect that it be only used for the benefit of the dogs.

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

This is a danger to rarer breeds where preservation breeders are working to preserve their breed, within a limited breeding pool.

16. Birthing Whelping and care of puppies

Change “Birthing” to “Whelping” in the heading and the document. Whelp(ing) is the correct term. This is a Standards document and ‘humanising’ terms should be avoided.

merriam-webster - whelp- transitive verb

: to give birth to —used of various carnivores and especially the dog

Part 3 Additional Requirements for domestic dog business

Section 1

A **domestic dog business** is a person who owns five or more fertile bitches that are kept for the purpose of breeding and selling dogs.

We have a number of queries regarding this:

- How was the number 5 determined – reference was made to other States but can find no such restriction.
 - In Victoria the standards are:
 - Recreation Breeder has 11 or less
 - Commercial Breeder has more than 11
 - In South Australia it is based on the number of pregnant or lactating bitches
 - 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
- The number is too low for a Dogs West breed preservationist wishing to maintain a healthy gene pool
- Bitches may be entire, but may only be bred once or twice in their lifetime
- Bitches that are no longer bred may be kept entire, as scientific evidence mounts that sterilising dogs is not always in the best interest of the dog
- Are entire bitches under 18 months of age included in the 5?
- Are entire bitches over 7 years excluded from the 5?

The notes talk about 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 and a larger commercial breeder, it also does not distinguish between boarding kennels and commercial breeding.

Section 2 – Administrative requirements

17. Business practices

S17. (b) ensure there are reasonable means to ensure the care and monitoring of dogs housed in the establishment out of business hours

What is reasonable? This requires definition on the standard and what sort of establishment it refers to. Kennels and vets may have no method of checking on animals outside of hours.

Section 3 – Housing

Introduction

Remove "barking" from the 3rd paragraph regarding excessive noise. At meal times, barking is a common occurrence, as it may be when visitors arrive, dogs play or dogs are moving in and out of kennels for boarding and the like.

S15.3.1 b) have functioning fire-fighting equipment readily available and staff trained in its use

This is a good idea for a commercial business – but is not practical for a hobby breeder (ie home based), to be qualified in the use of firefighting equipment.

Appendix 1

Enclosure Design

As discussed at our meeting, the information is a little confusing because it calls for cleanliness, but has concerns over concrete flooring, which is the most common and easily maintained and cleaned flooring.

We do not support the idea of metal flooring in normal dog living quarters – obviously Veterinary use is entirely a different matter.

Appendix 3 – Feeding Dogs

Dog food types.

Feeding raw offal to dogs is not recommended as it poses a health risk to humans, dogs and other animals.

We suggest that this be changed to:

Feeding raw offal to dogs ~~is not recommended~~ as it may pose a health risk to humans, dogs and other animals and hygiene should be carefully managed.

Appendix 5

Care of Dog and Puppies – Page 40

Change heading “Birthing” to “Whelping”.