

STOP PUPPY FARMING

Supplementary Paper

May 2018

Your contact details

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Please indicate whether you are any of the following:

- Dog Owner
- X Dog Breeder *(select if you are a breeder)*
- Member of a dog breeder association - Dogs West
- Pet Shop Owner or Operator
- Pet Business – please specify below
- Local Govt. employee or elected member
- Local Government
- Other Government authority or agency employee
- Shelter or Rescue organisation employee or volunteer
- Dog Foster Carer
- Veterinarian
- Livestock Working Dog Owner
- Microchip database company

Other – please specify:

Transitioning Pet Shops to Adoption Centres

1.2 Accreditation of rescue organisations and shelters

1. What information should a rescue organisation or shelter provide when applying for accreditation?

Information on operational policies

- I would like to know how they assess their dogs as 'fit for purpose'. Most of these dogs will be sold as pets, how can traditional shelters provide an assurance that a dog in their care is fit to be a family pet?
- I have been advised that a number of shelters are spending vast amounts of donated money for surgeries on dogs that Vets have advised are not mentally sound. I want rescues and shelters to be accountable for the money donated.
- Some rescues in WA are actively sourcing dogs from pounds and shelters in other states. Why are they doing this if the dog does not have a designated home to go to. Lisa Baker MLA says no dogs should be bred until shelters are empty - how can that happen if they are bringing in dogs from other States to go into shelters?
- How can a dog be properly assessed for its fitness to be adopted if shelters do not see the dog until after it arrives in WA. What assurance do we have that those dogs are not dangerous dogs being moved from state to state to avoid euthanasia?
- Shelters should have to show some connection to the breed if they are breed specific shelters. For example, a long term understanding of the breed and a willingness to work with registered breeders, offering return of the dog to the original breeder in the first instance. This will ensure that the agreements that many breeders have to take dogs back are adhered to.
- Shelters should not be keeping dogs for ever and a day. They should have a policy that outlines how long dogs can stay in shelters and what measures are underway to mitigate long term stays for dogs. Dogs that cannot be re-homed safely and to suitable homes should not be kept in shelters long term.
- Shelters should never place dogs in a situation where the dogs can be purchased on an impulse. All prospective buyers should have lodged an interest to adopt and then should have a 72hour cooling off period in which time regular interaction with the dog of choice should be encouraged.
- Shelters should have the same duty of care and disclosure as registered breeders. They must have truth in advertising. If they do not know the parentage of the breed they must stipulate same. Unless they have proof of breed either through registered pedigrees or DNA then dogs should not be represented as particular breeds. Cross bred dogs must not be advertised as a mix of particular breeds unless the shelters have proof.
- Shelters should be offering free ongoing support and training for the dogs they place.
- Shelters should provide comprehensive care instructions for the dogs they are placing - including grooming, feeding, possible health issues, return policy, meeting local by-laws and legislative requirements.
- Shelters should be investigating people's experience with dogs then matching them appropriately with the dogs on offer. Many dogs in shelters have high needs as they

have been poorly socialised as youngsters or have had limited training. These dogs are not usually suitable for first time owners or people with physical limitations.

- Some shelters have dogs in foster care until they are adopted. How will you cater for the number of dogs in care in that situation?
- What happens when Shelters become multi-faceted i.e. Shelter and pound or Shelter and boarding kennel, or shelter and puppy production?
- No puppies should ever be born in a shelter environment. It would be very rare cases where shelters could provide a consistent 24/7 hands on experience from people skilled in raising puppies. A shelter environment is not the place for puppies to be born and raised.
- The number of dogs crossing the borders to go into shelter should be limited and subject to permits. There is potentially a huge bio-security risk from dogs, with little background or history, travelling in the same transport devices as family pets. Recently in the USA there was a deadly outbreak of Canine influenza that spread rapidly via the pet rescue networks.
- Staff indicates people who are paid to work at shelters. Most people working at these establishments are volunteers, they need to have minimum training and or experience that is tested in the workplace prior to them gaining a position. They need to keep their knowledge up to date with current improvements in animal welfare.

2. What should the Government consider when accrediting a rescue organisation or shelter?

- Rescues should not be breeding establishments
- Rescues should meet standards for keeping of dogs
- Rescues should temperament test all dogs by an accredited assessor
- Dogs that are not suitable for rehoming should not be kept on a “no-kill” basis as they may be a risk to their carers and end up being passed around from rescue to rescue – a lady in Southern River was killed by a dog being kept on a no-kill philosophy.
- There needs to be minimum requirements in regards to record keeping maintained by shelters. This would include dogs coming in, training given, Veterinary attention given, assessments conducted, history of the dog, where the dog goes.
- Shelters need to be accountable regarding funds donated and spent – they should be ‘not for profit’.
- Shelters need to be accountable for the dogs they place in homes for a minimum period of three months.
- Dogs West Clubs and Members offer breed specific advice and rescue to many breeds and should be accredited under any scheme as they operate within the Regulations and Code of Ethics of Dogs West.

3. Should these organisations be monitored?

- Yes

- No
- Unsure
- Depends on the following factors (please specify):

- **Organisations should have to provide a business model prior to being approved for establishment.**
- **Shelters should not be permitted to set up without prior approval and demonstration of how they can meet minimum standards as set down by Government**
- **Breed specific rescue that is conducted by Dogs West Registered breeders should be exempt as they operate under the Regulations and Code Of Ethics of Dogs West who have a proven compliance system in place.**

4. How should they be monitored?

- Audits
- Inspections
- Annual reporting
- Unsure
- Not applicable – they should not be monitored
- Other: _____

- **Yes. There should be random audits completed on records and facilities as well as the dogs that are in their care.**
- **If a rescue fails an audit there should be a stringent follow up process**

5. Is your organisation likely to apply to be an accredited rescue organisation or shelter that can provide dogs to pet shops?

- Yes
- No
- Unsure
- Depends on the following factors (please specify): _____

- **Members and Club who run breed specific rescues must abide by Dogs West Rules and Regulations, so they cannot supply any dog, for any reason, to a pet shop.**

7. Do you believe your agency should have a role in accrediting rescue organisations and shelters?

- Yes

Please specify reasons for your response:

- **Dogs West could accredit rescue organisations run by their Members and affiliated Clubs as many do offer breed specific rescue and have done for many years.**
- **Yes, as many Dogs West affiliated breed clubs and breeders run rescue operations for their breed of interest – not only for the dogs bred by a Dogs West breeder, but for dogs of that breed from any source.**

- Yes, as many many Members and Clubs use their breed experience and expertise which makes them ideal for doing this work, when they can, and some rescues have waiting lists of people who are looking for an older or second dog.
- Yes. Dogs West has rules and regulations that require a certain level of care, responsibility and ethics in relation to the dogs our members breed. If they wish to 'rescue' or rehome the dogs they have bred, or assist other breeders or the breed in general, then they should be exempt from accreditation.

8. If you answered yes, what would this role be?

- Dogs West could play a role in accrediting these breed specific rescues, run by Dogs West affiliates by a reporting process, which would also assist in presenting a true picture of where these dogs come from.
- It is hard to answer this question, because it is dependent on the standards that may be adopted for Rescues, but I am sure Dogs West will assist its Members to continue their work.
- Many Rescues rely on the goodwill of individual Dogs West members who foster and care for dogs to ensure they are suitable for their breed for rehoming. Dogs West could monitor their activities, but I would not like to see that monitoring or government standards make it impossible for Members to continue to play this vital role.
- Any regulations around the good work being done already by such rescue groups should not be hampered by onerous regulations, reporting should be simple and Dogs West could monitor this.

1.3 Assessment of the health and behaviour of dogs

9. Should it be the responsibility of the pet shop or the rescue organisation or shelter to have a dog submitted to a vet for a health and behavioural assessment?

- The estimated cost of a behavioural assessment by a suitably qualified Veterinarian is \$350. This cost would be a burden to the rescues. It should be paid by the Pet Shops who are offering the dog for sale.
- No dog sourced from pounds, shelters or rescue organisations should cross the border into or out of WA without a proper behavioural (and physical) assessment that shows the dog is fit for purpose as a pet.

10. Who should be responsible for bearing the cost of that assessment?

- The cost would be ultimately paid by the new owners who should only be charged for the cost associated with that assessment.
- Nobody should be making a profit from that assessment, it should only be cost recovered.
- The person buying the dog should be paying for this in the cost of the dog – and it should be on a cost-recovery basis only.

- I think the new owner should pay – only the actual cost – should not pay more than covering the cost of the assessment.

11. Who should be responsible for carrying out the health and behaviour assessment?

- The number of Veterinarians who have studied canine behaviour as a specialty is limited but it is important that either those Vets or Qualified Canine Behaviourists only are used. There needs to be a list of 'Authorised Assessors' approved by Government.
- I am not sure because I do not know who is best – but they must be trained, qualified and have working knowledge to be able to do this assessment.
- Only a trained animal behaviourist can do this – are there going to be enough of them to do this work on every dog?
- Will there be a capped fee for this assessment – otherwise this could become very expensive and people will avoid doing it.
- I think this should only be done by someone who is trained and qualified to do it.

12. What aspects of a dog's health and behaviour should be assessed by a veterinarian?

- All of the above are important but the most important, which is not listed is 'safe around humans of all ages'.
- I think a dog should be checked for overall health, and any issues or long-term health issues made known.
- I think a full health check, with disclosure of any issues, should be standard. Behaviour should be assessed, both with other dogs and most importantly with people. After all, they are going to live with people.
- A dog may not like other dogs, but may be perfectly fine with people. This needs to be a known factor for every dog – dogs can be managed around other dogs if the right home is found, but they will always live with people.
- Safe around people is more important than reaction around other animals. Responsible dog ownership will manage the interactions around other animals. The right people need to be matched to dogs, especially when they are dog aggressive. Being dog aggressive needs management but not necessarily loss of life.

13. What would this cost?

- This would be very costly and would be anything from \$350 upwards.
- I don't know how much this might cost – but the cost of a child or person being bitten, or a dog badly wounding another dog, is much higher.

1.4 Transition period

14. Please indicate your preference for the following:

- Other transition period – please specify: Immediate – no dogs to be sold from pet shops for any reason.

Please indicate reasons for your preference:

- I do not believe Pet Shops are the place for the selling of dogs under any circumstances. Rescue dogs can have a host of unknown past experiences and already be under stress from living in a Rescue situation. Taking that dog to another strange situation simply puts the rescue dog under even more stress and could lead to impulse buying from an inexperienced person or family.
- Pet shops should only be selling commodities that support the comfortable life of dogs. They should not be selling dogs or cats. No transition period.
- Pet shops are the primary cause of this legislation. The smart ones have moved away from trading in live pets. The rest of them need to update their business models and also move away from live pets.
- Perhaps a compromise could be that Pet Shops can assist in rehoming dogs by displaying dogs that are available in shelters either by streaming a video loop or photos with contact details.
- Pet shops can transition by being adoption centres for two years then move to no cats or dogs.

15. What support can be provided to transition pet shops into adoption centres?

- Government could provide some funding towards training staff who may lose jobs due to change in structure
- Some people may lose their jobs if their job is to look after dogs/puppies for sale – what assistance will they get?
- Government could provide support, workshops or training via SBDC in relation to Pet Shops transitioning away from trading in Pets and towards similar models as the bigger pet shops.

1.5 Arrangements between pet shops and rescue organisations and shelters

No Comments

1.6 Enforcement

22. Should pet shops have to register with a relevant authority if they sell dogs?

- Yes they should have to register with the DPIRD and they should have a license that needs to be renewed subject to assessment.
- I am surprised that they don't already have to do this, as they are a business – don't they have to have a licence already?
- Only legal entities can hold a permit or register.

24. What information and records should a pet shop maintain to ensure compliance with the pet shop provisions can be monitored?

- Records of where dogs have been sourced from
- Details of new owners
- Details of health and behaviour checks

Other – please specify:

- Length of time dog has been in rescue, breed description and photo. Age of dog when sold, microchip number and any conditions of sale.
- I also believe a cooling off period of say, 72 hours, would be useful.
- They should be 'required' under the Act to provide open and transparent access to records.
- They should be required to keep certain records (such as where they sourced their dogs from along with contact details).

25. What information and records should a rescue organisation and rescue maintain to ensure pet shops can be monitored and information verified?

1. History of dog while in their care
2. Date dog sold from pet shop
3. Date/s dog is taken to pet shop
4. Microchip, breed description, photos for identification
 - All records should be matched to microchip details
 - photographs of dogs taken from all angles to show colours and colour patterns
 - Any other identifying marks should also be recorded such as scars and tattoos

26. How should a pet shop be monitored for compliance?

- Twice yearly returns outlining dogs in and out should form part of the process. This information should be recorded on a central database with a permit number matching to the shop and the animal sold identified by microchip
- Random Audits to match data provided. Penalties to be applied if errors or non-compliance is identified
- Records should be kept of dogs coming and going, so that dogs can be tracked if they end up in another rescue
- How will customer complaints about dogs be managed/recorded to stop a dog going from home to home
- Customer complaints should all be recorded in a central database and should generate some form of action – either a visit or at least a phone call.

27. If enforcement was cost recovery, what would local governments' capacity be to enforce these provisions?

Comment if you wish – no comment necessary.

Mandatory Dog De-sexing for Non-Breeding Dogs

2.2 Age of mandatory de-sexing

1. Please indicate your preference for the following:

- Another age – please specify: Minimum age of 12 months.

Please provide reasons for your preference:

- I voted to try to Stop Puppy Farming. I did not vote to be forced to have my dog desexed nor anyone else's for that matter.
- It takes away my rights.
- If too many dogs are sterilised as a result of this law it will be very hard for the public to be able to obtain a healthy, well-bred dog from a responsible breeder because there will not be enough dogs being bred by the right type of breeders. There will still be plenty around from the Puppy Farmers because I have read that mandatory sterilisation does not stop THEM.
- I am a responsible dog owner and a member of DogsWest. I have no intention of breeding from my dog. I just want him to be healthy and strong for as long as possible
- A Dogs West Member has spent a lot of time talking to rescue organisations. Turns out, dogs are being shipped in from interstate to top up numbers in some Rescues when they run low. Not to designated homes – to join a shelter. So how will mandatory sterilisation lower numbers in shelters?
- You say that mandatory sterilisation will reduce numbers of dogs in shelters – what about the dogs that are being shipped in from interstate to come into shelters here and then found homes for – why are they not managed in the State they are coming from where populations are greater?
- Why is mandatory sterilisation being considered in WA when the major Australian states do not have it – only the ACT and South Australia have this in place.
- Why does WA need compulsory sterilisation when biggest States do not?
- I have read that mandatory sterilisation has not effectively reduced the problem of puppy farmers anywhere in the world where it has been legislated. I have read that the AVA is not in favour of mandatory sterilisation for this reason.
- This legislation is based on welfare of dogs, yet the mandatory sterilisation of dogs creates its own set of health and welfare issues. I don't see how passing a law requiring mandatory sterilisation, which can be seriously detrimental to the health of dogs, is justified while trying to fix another health and welfare issue. Replacing one problem for another does not make sense.
- I do not believe in a set age for the sterilisation of dogs. There are many studies about sterilisation of dogs, with more studies coming out all the time. Many are against sterilisation.
- Any legislation proposed by government should be on a "no-harm" basis. Many studies show the effect of sterilisation on dogs in relation to diseases, such as cancer, behavioural issues and incorrect growth, such as elongated bones and joint disorders.

- If a dog needs to be sterilised it should be at a time and age suitable for the type of dog and the circumstances, with advice from a Vet and a breeder.
- I do not believe in mandatory sterilisation – and advise my puppy buyers not to sterilise, if required, before 12 months of age. Larger breeds should be later.
- Not until it was both physically and mentally fully developed.
- When recommended by the breeder as there is not a one age fits all approach.
- My dog does not wander without supervision and I do not have two dogs. I don't want to de-sex my dog.
- My breed of dog needs to remain intact as it is a breed with a small gene pool and my breeder wants to assess their quality for possible breeding at a later date.
- My breed of dog is well known for not being receptive to artificial breeding practices. Mandatory de-sexing would severely limit our already small gene pool.
- My research into scientifically backed information suggests early de-sexing is detrimental to canine behaviour and also physical wellbeing. I do not want to de-sex my pet until it is a more mature age.
- When I voted to Stop Puppy Farming, I believed that the Government intended to act in the best interests of all dogs. From what I have learned, forcing dogs to be sterilised when they are too young is seriously detrimental to their long term health. I feel bad now, that I have voted for something that I did not intend to happen, and that it could seriously impact on the health of dogs that I only wanted to help.
- I am a Dogs West member and I am the owner of a number of older dogs that have retired from my breeding program. I do not want to put these aged dogs through major surgery when they are going to be at risk due to General Anaesthesia. Please do not make dogs over the age of 7 years required to have this surgery. We are not permitted to breed from them as per Dogs West Code of Ethics. Please give dogs that are involved in a Dogs West breeding program an exemption for life.
- I am a Dogs West breeder and I place dogs in pet homes where I retain the breeding rights to the dog. Those dogs should be linked to my registration number so I can keep their records up to date in relation to breeding and desexing.
- I am a Dogs West member, when someone registers an intact dog that is being kept intact for my purposes there should be a link from the database to my record and I can go in and confirm that dog is on my list of intact animals. If I change my mind I can take the dog off the list and it can then may be subject to de-sexing regulations/legislation.
- As a Dogs West member I need to keep some dogs intact for future breeding. I would like and exemption to de-sexing for those dogs. The new owner's record could link with mine as a co-owner for breeding purposes. That way I am still the breeder, not the new owner.
- I am a Dogs West, ANKC registered breeder. I have several dogs placed out in pet homes as loved companions. These dogs are still available to me to use for breeding (on breeder's terms). Under this legislation these dogs may have to be sterilised. This will be a great loss to my breeding programme and will significantly reduce the available gene pool and affect the genetic diversity of the breed in this state.

2. If you have a de-sexed dog, at what age was it de-sexed?

- I have never desexed a dog under 12 months of age, and only ever on medical grounds.
- What relevance does this question have? Are you saying if I say Yes, that I agree to mandatory sterilisation?

2.3 Age for registration, microchipping and de-sexing

3. Please indicate your preference for the following:

- Option 3 – registration at three months; onus on owner to advise when dog de-sexed

Please provide reasons for your preference:

- Options 1 and 2 are promoting early sterilisation – why is this the focus?
- Option 3 would allow for the dog to be sterilised at an age agreed by the owner and their vet on the best age applicable to that dog - if it is to be desexed at all.

2.4 Additional possible exemptions from de-sexing

5. Should livestock working dogs be exempt as a class from mandatory dog de-sexing?

- Yes

Please provide reasons for your preference:

- There should be no mandatory sterilisation.
- I think people with livestock working dogs should be exempt – they need to be able to breed dogs that can do the job.
- I understand that people with working dogs need time to assess the working ability of a dog before that dog could be used in a future breeding program. They should therefore be exempt from mandatory sterilisation until those decisions are made.
- Livestock working dogs are bred to work – and it takes time to ensure that a dog has good working ability and may then be used for breeding. They should not be sterilised before they know if they are good working dogs.

6. If working dogs are required to be de-sexed by a particular age, at what age should working dogs be required to be de-sexed?

- Not until they are old enough to be assessed on their working ability to decide if they will be used to contribute to future generations of working stock.
- No working dog should be desexed before it is known if it is to be part of a breeding program.
- I don't think they should have to be desexed unless they are no longer to be a dog that is working, or is part of a working dog breeding program.

- Only to be desexed if not to be a working dog or part of a working dog breeding program.

7. How could this be enforced?

- I cannot see how this can ever be enforced – the State is just too big and many areas quite remote.
- Working dogs are located all over this very large state. I cannot ever see inspections or compliance being used on properties which cover enormous physical areas.
- It is simply not possible. How could enforcement cover the entire State?
- I question what role working dogs play in puppy farming?

8. Should Members of recognised breeding associations be exempt from the mandatory de-sexing requirements through their Membership Status.

Yes

- All Members of Dogs West should be exempt from mandatory sterilisation, whether they are a breeder or not.

9. What criteria should be considered by the State Government in approving recognised organisations?

- Only organisations that have proven standards, including the oversight of their members breeding activities, with demonstrated outcomes where these standards are breached, should be considered.
- Dogs West, an affiliate of the Australian National Kennel Council (ANKC) is the only organisation based in WA which meets this criteria.
- In other States, other Affiliates of the ANKC have been recognised in this way.
- In South Australia, DogsSA collects the breeder registration fee from breeder Members and forwards this to the relevant SA State Government body.
- Dogs West should be approved and their Membership number used as the State Government number – this is what is done in South Australia. This gives transparency between the two Registers.

10. Are there any other class of dogs that should be exempt from mandatory de-sexing?

Yes

Please provide reasons for your preference:

- There should be no mandatory sterilisation.
- Dogs owned as companion animals but still connected to their Breeder.
- Dogs held on breeders terms from a Dogs West breeder, should be exempt – they are part of the wider Dogs West community of dogs and may be crucial to maintaining a wide gene pool for the breeding of healthy dogs.

- Many dogs live full and happy lives as companion animals in a loving home, and are occasionally used by their breeder in their breeding program, they should be exempt.
- Restrictions under the WA Dog Act make it very difficult for many Dogs West breeders to maintain a breeding program, without the ability to have dogs in their wider community.
- Some dogs are also shown from that wider community, with the dog living in a companion home, but shown by the breeder of the dog. They must be exempt.
- I am a Dogs West breeder and I place dogs in pet homes where I retain the breeding rights to the dog. Those dogs should be linked to my registration number so I can keep their records up to date in relation to breeding and desexing.
- I am a Dogs West member, when someone registers an intact dog that is being kept intact for my purposes there should be a link from the database to my record and I can go in and confirm that dog is on my list of intact animals. If I change my mind I can take the dog off the list and it can then may be subject to de-sexing requirements.
- As a Dogs West member I need to keep some dogs intact for future breeding. I would like and exemption to de-sexing for those dogs. The new owner's record could link with mine as a co-owner for breeding purposes. That way I am still the breeder, not the new owner

2.5 Transferring dogs

11. Do you support the provision of a pre-paid voucher by the dog breeder if the dog is not de-sexed?

No

- I have concerns over how this will work for a puppy sold to someone who lives nowhere near me, or the person moves before the voucher is used. What then?
- Will vets have an arrangement that they will recognise a voucher from another vet – what if someone lives too far away or does not want to use my vet?
- What happens if a voucher is never used?
- If I sell a dog interstate – what happens then – how would this work?
- Will there be exemptions – how is the sale of a dog to another Dogs West Member, or a Member of another ANKC Member body?
- What happens when a dog is sold interstate?
- If a new owner lives a significant distance from my vet – how will the voucher be used?
- New owner moves interstate before the voucher is used – what happens to the value of that voucher?

12. What should be the value of the voucher?

Other – please specify:

- No mandatory voucher

2.6 Enforcement

21. Who do you believe is best placed to monitor compliance with de-sexing?

Local Governments

Please provide reasons for your preference:

- When a dog is registered with Council now – you say it is desexed or not – so what will change?
- Can be managed as part of dog registration – same process as exists now
- Local Government already records this information – and people get reduced registration fees for sterilised dogs – this should stay
- What have you done to determine what the level of risk of puppy farming is in this state?
- Do you have any intelligence to back your claims that there is in fact puppy farming in WA and to what extent does it exist?
- How will you determine that you are only targeting the people that this legislation is aimed at?
- This legislation is a bit like setting shark nets, not many of us are Apex predators but we might get caught in your net.
- Enforcement can only follow months of research into who should be targeted. You have said this is all about stopping puppy farming but do you have any risk assessments in place that indicate how great the risk is.
- Do you have any benchmarks in regards to what a successful outcome of this legislation will look like?
- You have already told us that you don't know where the puppy farmers are and you have also mentioned that you will not stop everyone. Just how much of a difference are you hoping to be able to make?
- Why not just use your current legislation? Make a few amendments if it is failing.
- Have you completed a risk assessment on doing nothing? The legislation is meant to stop puppy farming but in doing so you are introducing a package that will stop puppy production or at least limit it.
- How do you plan to improve compliance when you have such a small target (by your own admission you don't know who or how many, you can't find them - a needle in a haystack maybe).
- Nobody would every expect 100% compliance but if you are going to introduce this bill it is only fair that you can demonstrate success by showing a measurable shift in compliance.
Will you be able to do that? Can you provide an accurate figure on the numbers of offenders now?
- Most of the people currently get it right, there are some people who are trying to get it right but might slip due to error or ignorance and then there are people who are never going to comply and will re-invent themselves to avoid you. What is your plan in relation to educating the people who are trying to get it right. Can you guarantee that enforcement action will only be against those deliberately operating outside the

legislation. We do not want to see people who try to get it right being used to prop up stats that this proposal was warranted.

Centralised Registration System

Access to the System

1. Are any other authorities or groups that should have access to the system?

- Yes – please specify below.
- No
- Unsure

Please specify:

- **Until the scope and use of the proposed central registry is known I can not comment on who should have access. However the basic principles of privacy and a valid need to know must be applied at any party being considered for access.**
- **What safeguards will be in place to ensure the information contained in the registry will only be accessed for legitimate and approved activities.**

3.3 Additional information

4. Do you think any of the following additional information should be included on the centralised registration system (you may select more than one option):

- Other information – please specify:

Please indicate reasons for your preference/s:

- **Without having a true picture of who may have access to the above information I am unable to comment or support a view.**
- **Currently, much of this information is only available to Local Government Officers in their own jurisdiction – who else will be able to see it?**
- **As I do not know who will be given access to this information, I cannot support more information being held.**

3.4 Dog registration information

14. Please indicate if you think any of the additional information should be included on a dog's registration:

- information on whether the dog is used as a livestock working dog
- information on whether the dog is used as an assistance dog

Please indicate why you think this information will be beneficial:

- **Without having a true picture of who may have access to the above information I am unable to comment or support a view.**
- **As I do not know who will be given access to this information, I cannot support more information being held.**

- Livestock working dogs are already recognised on local government registration systems.
- I understand Local Government already recognises livestock working dogs and assistance dogs when they register them – so this would not be additional information.

3.5 Updating dog registration information

15. Do you think veterinarians should be able to update and input dog's microchip and sterilisation details into the system?

Yes

Please indicate why it would be useful:

- Vets should always check any dog to ensure it is microchipped whenever it visits a vet – many dogs are not microchipped – the owner should be made to have the microchip done if it is not.
- I think Vets should only be updating records with the consent of the owner.
- I agree with the concept, but don't understand how the timing would work – the puppy is unlikely to always be registered by the time it is microchipped.
- Vets can check to ensure that the person actually owns the dog by confirming the microchip number against the owners details.
- Puppies can be presented to a vet for microchip very early – earlier than the breeder is required to register them – so how would a vet be able to update a record that isn't there yet?
- Updating a record when a dog is sterilised sounds a good idea – but will all vets commit to doing this?
- Will vets charge more for providing these services?
- Will it cost me more to have my vet provide this service?

16. Should it be a mandatory requirement for veterinarians to input this information into the system, or optional for veterinarians to input this information?

Mandatory

Optional

Not applicable

Please provide reasons for your preference:

- Must be done with the consent of the owner. However, I do believe that vets should check to confirm that a dog is microchipped - too many are not.
- I think Vets should only be updating records with the consent of the owner.
- Do all vets have the resources to do this – some are small practices.

3.6 Transition existing dog registers

21. Please indicate your preference for the following:

Option 1 – Develop and provide data migration software to transfer lifetime dog registrations to the centralised registration system.

Please indicate reasons for your preference:

- It is hard to know which option is best because the number of lifetime registered dogs in the state is unknown. If a relatively small number of the total database manual entry or owner registration might be better.
- It is not only life-time registrations where the dog may be deceased – dogs can be registered for 3 years and may no longer be living.
- Data transfer only requires a data schema to be given for data transfer, whether life time or not.
- Extraction of data into a data schema from databases is not overly difficult.
- Once the central system is ready and a data extract schema known and tested, why would all the records not be transferred at a given point in time?

23. Which of the following would you support to cover the costs of migrating existing data?

- none
- Cost should be borne by the State Government – it is their initiative
- Government Register – State Government meets the cost
- State Government should pay
- Dog owners should not have to pay for this – they have already paid a registration fee

31. Would you prefer:

- I should not have to pay to transfer my dog from one register to another
- I would be happy to reregister my own dogs online if there was no charge – if it was at renewal time, I would expect to pay the current fee, not additional fees.
- No – it should be managed between the State Government and Local Government.
- What will be the quality control over the registration of a dog online by an owner?

32. If you are a dog owner with an existing lifetime dog registration, would you be willing to re-enter your details in the centralised registration system online?

- I would be happy to reregister my own lifetime registered dogs online if there was no charge to do so.
- No – it should be managed between the State Government and Local Government.
- What will be the quality control over the registration of a dog online by an owner?

3.7 Application and approval – dog breeder registration

33. What information do you think a dog breeder should provide when applying for breeder registration or renewal?

Whether a person has been convicted of an offence under the Dog Act, Cat Act, Animal Welfare Act or a dog or cat local law.

Other – please specify:

- **Dogs West membership number should be used as the Dog Breeder Registration number for Dogs West Members.**
- **Dogs West members must be exempt from breeder registration – they must be automatically accepted as they have to comply with comprehensive Regulations and a Code of Ethics, which are enforced.**
- **The Dogs West Member number of a Member holding a prefix, and therefore able to breed, should be the number used on the Central Registry to give transparency and accountability between the two.**
- **Anyone convicted under the Animal Welfare Act is not allowed to be Members of Dogs West – they cannot join and if found guilty whilst Members, their Membership is cancelled and they lose all Member privileges. Dogs West Members should have automatic approval.**

34. What do you think local governments should take into account when considering a dog breeder application or renewal?

Other – please specify:

36. In what situations should a local government be able to enter and inspect premises of a dog breeder of that are subject to a dog breeder application or renewal?

Unsure

Local Governments do not have the resources to carry out inspections of this nature – how will they be able to do more?

3.8 Conditions – dog breeder registration

38. On what grounds do you believe a local government could cancel a dog breeder registration?

The dog breeder is convicted of an offence under the Dog Act, Cat Act, Animal Welfare Act, or a dog or cat local law

Other – please specify:

- **Point 3 says dog owner number on the microchip – is this not proposed to be a dog breeder number??**
- **If a dog, for whatever reasons, ends up changing hands multiple times, is the breeder still going to be responsible under consumer law??**

- **What if a dog is found wandering at large through misadventure – wind blows a fence down – will that case a breeder registration to be cancelled. Will there be a reasonableness clause?**

3.9 Exemptions – dog breeder registration

40. Should primary producers in WA be exempt from registering as dog breeders where they breed and transfer livestock working dogs to any person?

No

Please provide reasons for your response:

- **If dogs or puppies are sold to the pet market, they should be a licensed breeder.**
- **Do they register as a breeder with their own Association?**

41. Should particular dog breeders that are members of particular dog breeding associations be exempt from registering with the Government as dog breeders?

Yes – **Dogs West**

Please provide reasons for your response:

- **My concern is that you are lumping all breeders in together, regardless of what they breed and how – and how are you going to police them?**
- **Absolutely. Dogs West has set the bar pretty high when it comes to the breeding of dogs – and we have to be on the Dogs West / ANKC Register.**
- **Why should Dogs West Members have to be on another breeder register, when they have to comply with so many rules to become a Member and to remain one?**
- **I am a Dogs West breeder – I meet high standards – why should I have to just be another “breeder” on a government register that will not hold everyone to those same standards AND enforce them – we are accountable every time we act – these “breeders” won’t be.**
- **I am not opposed to others breeding dogs in a caring, safe and appropriate environment – Dogs West Members cannot meet the market demand to maintain dog ownership in Western Australia, but Dogs West members are already on the ANKC Register, recognised Australia Wide – they do not need to be on another register.**

42. Should recognised dog breeder associations in WA be responsible for inputting the details of their members into the Government’s dog breeder register on the centralised registration system?

Yes – **Dogs West**

Please provide reasons for your response:

- **I don’t think Dogs West Member breeders should have to be on this register.**
- **I agree with this proposal provided that Dogs West Breeders are automatically recognised and approved on the Breeder Register.**

43. What do you perceive to be the benefits of recognised dog breeder associations inputting their members details into the Government’s dog breeder register? (You may select more than one option)

- Creates consistency between registers
- Avoids duplication for dog breeders who would otherwise need to register with both associations
- Potentially lessens the administrative burden on local governments
- Ensures that dog breeders registered with dog breeder associations are also registered with the Government and can be traced on the Government system
- Other – please specify:
 - **Would see Breeder information being up to date with new/amended/cancelled/retired information being updated in a timely manner.**
 - **I think this is a good way for the Register to recognise Dogs West Breeders and that they are in sync.**

45. What criteria should be considered when approving a dog breeder association to be a 'recognised' dog breeder association that can input their member's details into the Government's dog breeder register?

- Privacy and confidentiality policies of the association
- Compliance with minimum standards for dog breeding, housing, husbandry, transport or sale
- **Cannot make any comment regarding the Standards quoted, as I do not know what they are.**
- **A proven framework of rules and ethics which are binding on Members and have a proven track record of enforcement – like Dogs West**
- **Dogs West members must adhere to and abide by the Dogs West Code of Ethics and Regulations and there is a process in place to sanction Members who do not adhere to these.**
- **Proof of regulation of Members, not just record keeping, but proof that members are held to account.**
- **Dogs West publishes breaches and penalties on their website – what other dog breeder association does that?**

46. If you are a member of a dog breeder association, would you like your association to be responsible for completing your Government dog breeder registration?

- Yes – Or NO if you do not agree.

Please provide reasons for your response:

- **Yes, this makes sense to me – my Dogs West Membership number should identify me as a Breeder when I have a breeding prefix**

- Yes, this could be done when I renew my Membership and prefix each year – seems perfectly sensible to me.
- Yes, Dogs West Members who have a Breeders Prefix should have Dogs West manage this process.
- No, I do not agree that my breeder association does this – I would prefer to do it myself.

47. Should the membership number of a member of a recognised dog breeding association be used as their Government dog owner number?

Yes – Or NO if you do not agree

Please provide reasons for your response:

- Yes, because this just makes sense – my Dogs West Membership number should identify me as a Breeder when I have a breeding prefix
- Yes as this would provide transparency and would differentiate Dogs West Members from other “breeders’ who do not operate under our strong Regulations and Code of Ethics.
- Yes, Dogs West Members should be differentiated from other “breeders” who may become one simply because they own an entire dog – that is such a silly idea.
- This would stop confusion when someone is looking for a dog or puppy, otherwise Dogs West Breeders will have their Dogs West Number as well as another Breeders number.
- By using the Dogs West number, Dogs West members would be easily recognisable as being such by the format and sequence of the Dogs West numbering system if this is to be included on Microchips.

3.10 Transferring a dog

52. Are there other ways to monitor or ensure dog advertisements comply with the requirement to provide both the dog owner number and dog’s microchip number? Please specify:

- Currently provision of dog owner numbers and dog microchip numbers are not a requirement for the sale of a dog. Dogs West regulations stipulate that Dogs West Members must advertise their MEMBERSHIP number when advertising dogs. However, this has seen other people copying these Numbers are using them fraudulently.
- The same thing will happen with any system put in place – dishonest people will continue to do dishonest things, and this will not stop them.

53. What agency could be responsible for prosecuting dog owners and breeders that do not comply with the transfer and advertisement requirements?

- Department of Primary Industries and Regional Development