

**From:** [REDACTED]  
**Date:** Monday, 27 May 2019 12:50 PM  
**To:** <dog.standards@dpird.wa.gov.au>  
**Subject:** Submission Standards and Guidelines for the Health and Welfare of Dogs in WA

Dear Sir/Madam

I have been registered with Dogs West as a breeder and show exhibitor of chihuahuas since 1975. I breed litters for my own showing and have very few puppies available as pets.

I write to respectfully request that the State Government grants exemption to Dogs West registered breeders from its legislation to ban puppy farms. Dogs West is one of eight state and territory canine controlling bodies which are governed by the Australian National Kennel Council Ltd (ANKC).

Dogs West registered breeders are well regulated and are required to comply with the Dogs West Code of Ethics, and Rules and Regulations which include but are not limited to :

the expiration of twelve months after becoming a member of Dogs West and the passing of an examination before applying for a breeding prefix,  
 the age at which a bitch may first be mated,  
 the age at which she may last be mated,  
 restrictions on the number of consecutive litters,  
 a limit of five litters in a bitch's lifetime, and  
 the registration with Dogs West of all pups whelped.

I submit that any additional impost in the proposed legislation will adversely affect ANKC registered breeders who breed only 15% of the annual demand for puppies as indicated in the following tables ([www.ankc.org.au](http://www.ankc.org.au)) :

#### Estimated Australian Dog Population 4.8 million

A conservative estimate is that due to mortality 10% need to be replaced annually which indicates a demand for 480,000 puppies per year

In 2016 ANKC Ltd Breeders registered 71,361 puppies, so to achieve the estimated number required, approximately 408,639 were bred by people outside the ANKC who have no accountability for health or welfare.

<b>ANKC Ltd Registered Breeders</b>	<b>71,361 Puppies*</b>
<b>Unregistered Breeders</b>	<b>408,639 Puppies</b>

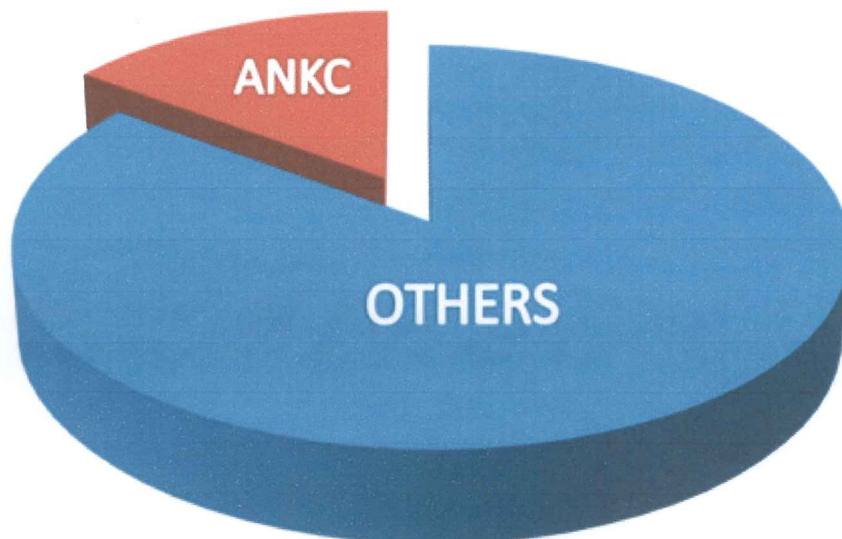
\* Source- ANKC Ltd Database

27/05/2019

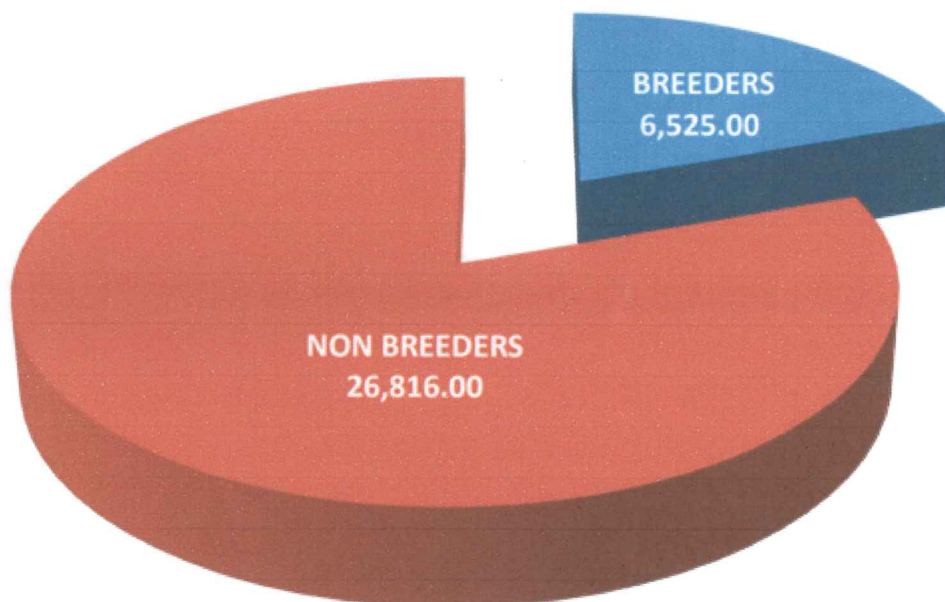
**ANKC Ltd Breeders 15%**

**Other Breeders 85%**

**In 2016 – 408,369.00 Puppies were bred with no accountability for health or welfare**



**2016 ANKC Ltd Membership 33,341.00**



**Only 20% of ANKC Ltd Members were Active Breeders in 2016**

## Lets do the Math Again !

In 2016 – 6,525 ANKC Ltd Breeders produced 14,091 Litters

3,583 Breeders (55%) Only had 1 Litter

1,406 Breeders (21%) had 2 Litters

659 Breeders (10%) had 3 Litters

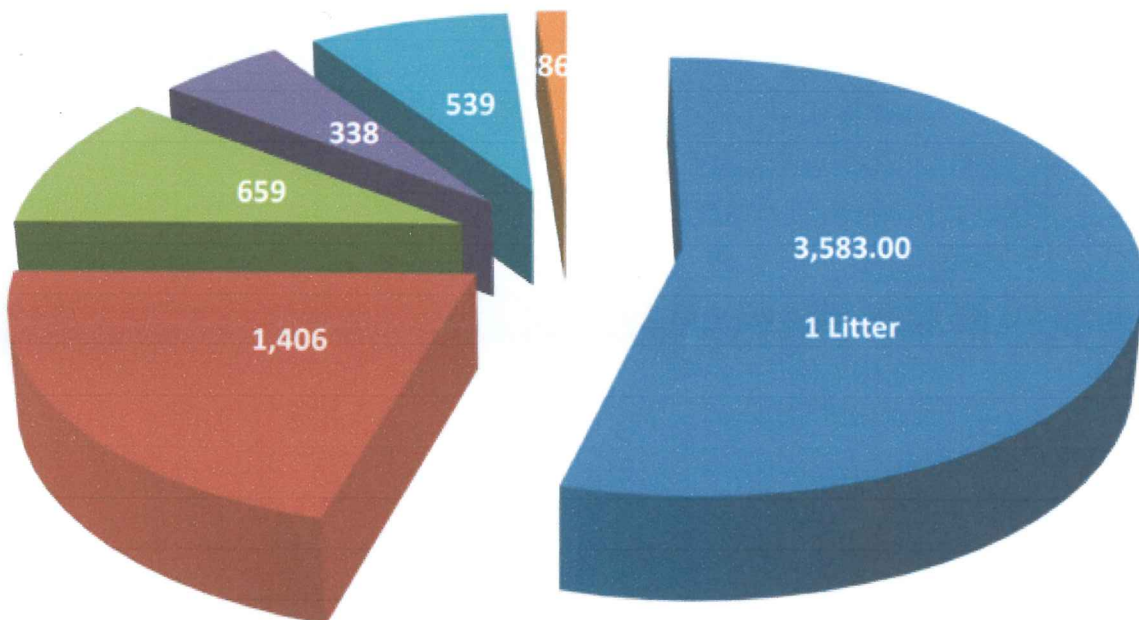
338 Breeders (5%) had 4 Litters

539 Breeders (8%) had 5 to 10 Litters

**Only 86 Breeders ( 1.3%) had more than 10 Litters**

\* Source- ANKC Ltd Database

**54% of ANKC Ltd Breeders only produced 1 Litter in 2016**



It is shown that breeding by ANKC members is judicious indeed with 80% producing no litters at all. As already mentioned, they provide only 15% of the annual demand for puppies.

Were the proposed legislation to impose additional requirements on Dogs West registered breeders such as

27/05/2019



mandatory desexing or obtaining a breeder licence from local government, they would have no choice but to breed even fewer litters. Thus, there would be an increasing public demand for puppies from sources which are not required to comply with Dogs West health and welfare regulations. These puppy farms and backyard breeders already supply the annual 85% shortfall of 408,000+ puppies.

I agree with the proposal that pet shops not be permitted to sell dogs and puppies. The Dogs West Code of Ethics does not permit registered breeders to supply dogs and puppies to pet shops. They have, however, provided a sales outlet for puppy farms and backyard breeders. It is historically difficult to monitor the activities of puppy farmers and backyard breeders even though there is already legislation in place. They have operated with impunity by selling pups, very young and sometimes sick, in car parks or at friends' homes, and through pet shops.

The demand for pet dogs is now more for smaller dogs which fit current living conditions. Smaller breeds have small litters (say, 1-4 pups) compared with larger breeds which have large litters (say, 10-14 pups).

Dogs West regulations militate against registered breeders, and, in particular, the registered breeders of small breeds. Based on these regulations, the estimated maximum puppy production per bitch is :

	Small breeds	Large breeds
Dogs West breeders	20	70
Non-registered breeders	32	112


The potential adverse effects on health of desexing, especially early desexing, have been well canvassed in other submissions. There is documented scientific research which discusses these issues.

On health issues, ethical breeders have contributed to modern science. For example, Australian border collie breeders spent twenty years and thousands of dollars in developing a DNA test to eliminate ceroid lipofuscinosis. This is the same as Batten's disease in children, a fatal inherited disorder of the nervous system. The border collie research contributed to preventing this disease in children.

The proposal that a breeder licence be obtained from local government is particularly problematical. Many local government bodies will not, and have already indicated that they will not, grant such a licence. Only breeders living in the limited prescribed kennel zones would still be able to breed dogs.

I am concerned that the proposed amendments would adversely affect ANKC registered breeders of purebred dogs to such an extent that there will be an increasing shortage in the availability of pets. This would affect how the average person obtains their pet dog which is already not easy. They would be forced increasingly to seek their pet dog from the very sources which this legislation purports to limit.

I would therefore urge that you consider the views of Dogs West registered breeders whose prime concern is the health and welfare of purebred dogs.

  
(My submission may be published anonymously)