Australian Veterinary Association
Western Australia Division
Submission on the draft ‘Health and Welfare of Dogs in Western Australia – Standards & Guidelines’
The Australian Veterinary Association (AVA) is the only national association representing veterinarians in Australia. Founded in 1921, the AVA today represents 9500 members working in all areas of animal science, health and welfare.

Veterinary roles extend far beyond caring for the health and welfare of our pets and production animals. Veterinarians are the pathologists, field officers and inspectors that secure the safety of our food, ensure market access for our exports, and help to safeguard the human population from zoonotic diseases.

Background
Dog and cat ownership is an integral part of the human-animal bond and plays an important and positive role in the health and wellbeing of the community. Benefits can include companionship, health and social improvements and assistance for people with special needs.

It is essential that the physical, social and welfare requirements of the animal are considered before they are acquired, not just the needs and wants of the owners. This commitment and duty of care remains throughout the life of the animal.

The proposed, “Health and Welfare of Dogs in Western Australia – Standards and Guidelines” utilises a standards and guidelines approach. This is consistent with the national approaches on regulating the welfare of animals where clear minimum standards are detailed along with recommended guidelines on good practice. The AVA supports this approach and is pleased to see Western Australia adopt it for this document.

Discussion
While the AVA is broadly supportive of many of the elements within the Standards and Guidelines, this submission will highlight a number of amendments that we would like to see included.

Part 2: Section 3 – 7 Health and veterinary care
Monitoring of an animal’s health and welfare, including regular veterinary checks, is essential. It is positive to see these embedded in the standards and guidelines. However we would like to see the dental section expanded.

Guideline 7.14 discusses dental care for dogs, stating that,

*Dogs’ teeth and gums should be checked regularly and appropriate action taken when signs of poor teeth and gum health are observed.*

There is a growing trend in non-veterinarians offering ‘anaesthesia-free dentistry’. These providers offer to do ‘dentals’ or cleaning and scaling of pets’ teeth while the animal is fully conscious. This practice is problematic for several reasons:
- comprehensive examination, diagnosis and treatment cannot properly proceed whilst an animal is conscious;
- undertaking procedures of this nature on a conscious animal requires the animal to be physically restrained, which is aversive and may have negative psychological and behavioural consequences for the animal;
- persons undertaking the procedure place themselves (and potentially other persons) at risk of being bitten or suffering other injuries inflicted by the distressed animal; and
- the term “dentistry” is potentially misleading: at best, anaesthesia-free dentistry is a purely cosmetic activity which delivers no health care benefits, and at worst it has the potential to mask underlying dental pathology resulting in delayed treatment of dental disease.

As such, an additional standard or guideline should be included to caution consumers against using ‘anaesthesia-free dentistry’.

**Part 2: Section 3 – 13 Electric Collars**

From an AVA perspective, the use of positive reinforcement training methods is recommended for modifying the behaviour of animals, and negative reinforcement and positive punishment methods are not recommended. Although equipment based on these methods is available for use in Australia, its use is not recommended.

Barking is a normal behaviour of all dogs and occurs for a number of reasons e.g. guarding, excitement, attention seeking, and anxiety. The use of punishment to control excessive barking does not take into account why the behaviour is occurring and therefore does not address the root of the problem.

Dogs escape for a number of reasons but a common reason is anxiety e.g. separation anxiety, noise fears and phobias. Punishing a dog with an anxiety disorder is inhumane.

There are three different designs of behaviour-modifying collars:

1. Manual, radio controlled collars which are activated by a remote hand held transmitter.
2. Anti-bark collars which are activated when the dog barks. Such collars may utilise a microphone, a vibration sensor, or a combination of both.
3. “Invisible fence” containment devices, in which proximity to a wire placed around the boundary activates the collar. These devices often incorporate a warning “beep” which precedes the electric shock by several seconds and enables the animal to move further from the boundary wire and avoid the shock.

Such collars – commonly called “e-collars” – may deliver an electric shock (“impulse”) a squirt of an unpleasant odour (citronella, lemon juice), a puff of air, or an ultrasonic tone. The main concern with the use of these products has been regarding e-collars. The full effects of citronella and other collars on animals are not known however citronella and high-pitched sounds are likely to be aversive.

The shocks caused by e-collars are unpleasant, painful, frightening, and cause both short-term and long-term stress. Risks associated with use of behaviour-modifying collars that use electric shock include the potential for dogs to develop conditions such as learned helplessness, increased anxiety, increased aggression, redirected aggression, long-term potentiation (i.e. the problem becomes worse) and reduced motivation.

The AVA position is that,
Behaviour-modifying collars that use electric shock should not be used on animals and should be banned. Behaviour-modifying collars that use citronella (or other nontoxic substances) are not recommended.  

Part 2: Section 4 – 15 Breeding of dogs

The AVA is pleased to see the inclusion of a standard in relation to breeding dogs with genetic disorders.

Selective breeding of companion animals based on genetic tests should only occur where there have been proven phenotypic outcomes which will improve an animal’s viability, conformation, health and welfare. Companion animals should not be bred if they carry genetic disorders:

- with a high heritability, that will be detrimental to the animal’s health or welfare, or
- with a low heritability, but which may severely compromise an animal’s health or welfare.

Part 3: Section 2 – 17 Business practices

Boarding establishments, including day care centres for small animals, provide a valuable service for owners who are unable to have their dogs and cats accompany them on holidays, during working hours or in other particular circumstances when they cannot be appropriately cared for in the home environment.

An increasing number of busy households include dogs and cats that have limited social and physical interaction with other animals and humans for extended periods each day.

Well-run day care centres can provide a range of benefits for dogs and cats by:

- allowing acceptable social interaction between different sizes and breeds in a non-threatening environment
- providing companionship and exercise through interaction between pets of the same species
- allowing non-aggressive social interaction between pets that often come from single-pet households; and counteracting boredom in the home by providing mental, physical and social stimulation.

For some animals, these facilities can provide the opportunity for avoidance of situations that progress behavioural illness; for example, animals that develop anxiety if left alone when an owner must work.

In the introduction to this section, the draft standards and guidelines notes that,

People responsible for dogs must have relevant knowledge, experience and skills to follow care and management protocols.  

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1 AVA Policy - Use of behaviour-modifying collars on dogs
2 DPIRD – Draft ‘Health and Welfare of Dogs in Western Australia – Standards & Guidelines’
However, this is not included within the standards themselves. Thus, a further standard should be included stating:

*Proprietors and staff of day care and boarding facilities must have minimum training, which includes education in species-specific needs and behaviours, as well as the health and welfare implications of behaviour problems.*

Further, we believe it is also of value to include a statement to the effect of,

*Boarding establishments must provide for the health and welfare of animals in their care, including the opportunity to carry out natural behaviours.*

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3 AVA Policy - Boarding facilities including dog and cat daycare centres  
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