Consultation summary report

Draft Standards and Guidelines for the Health and Welfare of Dogs in Western Australia

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Results at a glance

The Western Australian Government recognises the value of animal welfare to the community and strives to ensure that all animals receive appropriate standards of care. As companions and working animals, dogs have an important place in the lives of many Western Australians. The Department of Primary Industries and Regional Development released the draft Standards and Guidelines for the Health and Welfare of Dogs in Western Australia for public consultation on Wednesday 10 April 2019. Consultation was open for eight weeks, and closed on 7 June 2019.

Here are some of the results at a glance:

- **We received 1447 submissions** during the consultation period.

- **While the majority of respondents were from the Perth Metropolitan Area**, submissions were received from across many of WA’s regional areas.

- We heard from a wide range of stakeholders, including dog owners, dog breeders, dog trainers, local government employees, pet business owners and employees and veterinary professionals. **Over 80% of respondents identified themselves as companion dog owners.**

- **There was a high level of support for the concept of standards and guidelines. 93% of respondents generally support minimum standards for people who own or keep dogs. 95% of respondents generally support minimum standards for people who breed dogs. 87% of respondents generally support minimum standards for people who care for dogs in a domestic dog operation.**

- **53% of respondents agreed or mostly agreed that the proposed standards and guidelines in the document reflect community values and expectations for the acceptable treatment of dogs.** Of the 25% of respondents who generally disagreed with this statement, responses were divided between those who consider that the standards and guidelines were too strict, and those who are seeking more stringent conditions.

- Key issues raised in the community’s response to the consultation include housing issues, conditions proposed for breeding dogs and training matters, such as the use of electronic collars (e-collars) and prong collars. **While most draft standards were generally supported, a number of recommended guidelines generated a more polarised response.** The definition of ‘domestic dog operations’ also generated a lot of feedback. The importance of education, and the ability to enforce minimum standards was identified as essential to promote and protect the welfare of dogs in Western Australia.

The Department of Primary Industries and Regional Development would like to thank all those who took the time to provide feedback on the draft Standards and Guidelines for the Health and Welfare of Dogs in Western Australia.
Introduction to the Dog Standards and Guidelines

The project

Standards and Guidelines for the Health and Welfare of Dogs in Western Australia Project

In July 2017, the Department of Primary Industries and Regional Development (the Department) convened the Companion Animal Welfare Advisory Group (CAWAG), consisting of relevant government agencies, the Australian Veterinary Association WA and the Royal Society for the Prevention of Cruelty to Animals WA (RSPCA WA), to discuss companion animal welfare policy. Standards addressing the welfare of dogs were agreed as the top priority.

“Sadly, RSPCA WA regularly encounters situations where dogs are poorly treated but the conduct falls short of the criminal standard of cruelty as outlined in s.19 of the Animal Welfare Act 2002. As current legislation is largely cruelty based rather than animal welfare based, this can limit capacity to render assistance in cases where inadequate or inappropriate care leads to poor animal welfare before they escalate to animal cruelty. Cases of puppy farming and irresponsible and indiscriminate dog breeding are prime examples of the types of cases where the standard of animal care falls well below what is acceptable. These cases illustrate the urgent need for mandatory minimum standards to facilitate intervention and prevention.” (RSPCA WA - Written submission to the consultation on the draft Standards and Guidelines for the Health and Welfare of Dogs in Western Australia)

To further this priority, the Department initiated the development of draft Standards and Guidelines for the Health and Welfare of Dogs in Western Australia (draft Dog Standards and Guidelines). This document has been developed in consultation with experts in dog care and welfare, based on currently available scientific evidence and with consideration of existing policy in other jurisdictions. Where evidence has not yet been established or is not yet quantified, standards and guidelines have been based on current understanding of the welfare needs of dogs. Key documents considered in the development of the draft Dog Standards and Guidelines are listed on the Department’s consultation webpage.

Stop Puppy Farming initiative

The McGowan Government is committed to stopping puppy farming, the overbreeding of dogs and improving the health and welfare of all dogs in Western Australia. The Department of Local Government, Sport and Cultural Industries (DLGSC) is tasked with progressing the introduction of the following measures under the Dog Act 1976:

- Transition of pet shops to adoption centres
- Mandatory de-sexing of dogs (unless exempt) and
- A centralised registration system

The development of Dog Standards and Guidelines by the Department supports the fourth measure of the Stop Puppy Farming initiative; mandatory standards for dog breeding, housing, husbandry, transport and sale. More information on the Stop Puppy Farming (SPF) initiative can be found on the DLGSC website.

“Dogs are an important part of our lives; they are our friends and companions. In some cases, they play an important role in helping us, whether by working on farms, working as assistance dogs, or just by giving us emotional comfort and companionship.” (DLGSC Stop Puppy Farming Consultation Report, December 2018).
Stakeholder consultation

Prior to the release of the draft Dog Standards and Guidelines for public consultation, the Department also sought input from a number of agencies and peak industry bodies including:

- Animal Management in Rural and Remote Indigenous Communities (AMRRIC)
- Australian Federation for Livestock Working Dogs (AFLWD)
- Australian Veterinary Association WA
- Department of Local Government, Sport and Cultural Industries (DLGSC)
- Dogs West
- Murdoch University School of Veterinary and Life Sciences
- Royal Society for the Prevention of Cruelty to Animals WA
- Racing and Wagering WA
- WA Local Government Association (WALGA)
- WA Police Force
- WA Rangers Association

The efforts of all who contributed to this process are gratefully acknowledged. The Department notes that this input does not imply the document reflects all of the views or policies of these individual organisations.

While a wide range of specific issues, concerns and recommendations were raised by these agencies and peak industry bodies, there was general support for the draft document. Notwithstanding these areas for further consideration, the Department is pleased that the value of standards and guidelines to promote and protect animal welfare is recognised, and this work is generally supported by industry.

“Basically, the Australian Federation for Livestock Working Dogs Association are supportive of the draft of the Health and Welfare of Dogs in Western Australia (Standards and Guidelines) as they are currently written.”
(Australian Federation for Livestock Working Dogs, Submission to Standards and Guidelines for the Health and Welfare of Dogs in Western Australia 2019)

“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, Submission to Standards and Guidelines for the Health and Welfare of Dogs in Western Australia 2019)

Where approval has been granted, all written submissions have been published in full on the Department’s consultation webpage. Further comments and key themes from survey responses and written submissions are provided in the relevant sections of this Consultation Summary Report.
The draft document

The draft Dog Standards and Guidelines describe the minimum standards that owners and people in charge of dogs must follow to ensure the health and welfare of dogs kept in WA. The document also details recommended guidelines and additional information to further promote the health and welfare of dogs.

The draft Dog Standards and Guidelines are intended to apply to all dogs (Canis lupus familiaris and Canis lupus dingo) kept in WA. They do not apply to wild, free-ranging dogs that do not have ‘an owner’ or carer.

The difference between minimum standards and recommended guidelines

It is important to recognise the difference between a standard and a guideline. Standards are minimum requirements to meet the basic welfare needs of dogs. In the draft Dog Standards and Guidelines, they are presented in a text box labelled ‘Minimum standards’ and use the word ‘must’. If regulations are drafted, standards will form the basis of those regulations, which will be enforceable.

Guidelines are recommended practices to achieve desirable animal welfare outcomes and use the word ‘should’. A guideline may set a higher level of care than a standard. In some cases, the guidelines describe a recommended method of meeting a standard. While guidelines aim to encourage a higher level of welfare, it is recognised that guidelines may not be appropriate, or achievable, in all situations. It is also important to understand that guidelines will not be written into regulations, and will not be enforced.

Who is the ‘person in charge’?

The standards apply to a ‘person in charge’ of a dog. The term ‘person in charge’ is defined in the Animal Welfare Act 2002 (the Act) as follows:

- **person in charge**, in relation to an animal, means –
  a) the owner of the animal;
  b) a person who has actual physical custody or control of the animal;
  c) if the person referred to in paragraph (b) is a member of staff of another person, that other person; or
  d) the owner or occupier of the place or vehicle where the animal is or was at the relevant time.

The draft Dog Standards and Guidelines describe the responsibilities of people who are in charge of a dog. Under the Act, in some circumstances a dog can have more than one ‘person in charge’ at any one time. For example, the owner and a person who has actual physical custody or control of a dog (if different people) could both be regarded as a ‘person in charge’ of a dog.
Community Consultation

Why we consulted

The Western Australian Government recognises the value of animal welfare to the community and is working to ensure that all animals receive appropriate standards of care.

As companions and working animals, dogs have an important place in the lives of many Western Australians. This means that the draft Dog Standards and Guidelines have the potential to affect a large number of Western Australians. As such the document was released for public consultation to gather views from the community and stakeholders on:

- general welfare concepts for dogs;
- specific minimum standards that may be enforceable in the future; and
- the likely impact posed by the draft Dog Standards and Guidelines.

All feedback provided by the community and stakeholders as part of the consultation process is appreciated, and will be considered in shaping the final Dog Standards and Guidelines.

Following consultation, regulations on dog health and welfare may be drafted and adopted under the Animal Welfare Act 2002.

How we consulted

The Department released the draft Dog Standards and Guidelines on 10 April 2019. In accordance with the State Local Government Partnership Agreement, the Department consulted for an eight-week period, and consultation closed on 7 June 2019. A wide range of animal businesses, organisations and individuals who requested updates on SPF initiatives were notified by email at the beginning of the consultation.

An additional stakeholder meeting was held on 28 May 2019, when the Department met with a number of representatives from the dog training and electronic collar (e-collar) industry. There are strong views for and against the use of restraint and training devices on dogs. This meeting was convened to discuss industry concerns about draft Dog Standards and Guidelines addressing the use of e-collars for dogs. The meeting was an opportunity for the Department to provide background to the regulatory approach proposed in the draft document, and to hear the views and experiences of trainers and suppliers who support the use of e-collars, as well as opponents of e-collars. Representatives from the WA Local Government Association and WA Rangers Association also attended the meeting.

In addition to targeted meetings and consultation sessions with key stakeholders, interested parties were asked to provide feedback on the draft Dog Standards and Guidelines in a variety of ways including:

- an online survey;
- a public submission form comprised of the multiple choice survey questions; or
- written submissions, both hard copy and by email via the dog.standards@dpird.wa.gov.au mailbox.
Who responded

The online survey was part of a broader consultation which included an open invitation for written submissions. The survey was designed to capture feedback, both broadly on the draft Dog Standards and Guidelines, and on a select number of specific issues presented in the draft document.

The survey was open for an eight-week period from 10 April 2019 to 7 June 2019 and attracted 1334 responses. In addition, 113 written submissions were received.

![Volume of Survey Responses](image)

**Figure 1: Volume of Survey Responses**

Respondents were asked to identify the stakeholder groups that applied to their circumstances. Multiple responses were allowed, and the majority of respondents selected more than one group. As shown in Figure 2 below, 81% of respondents identified themselves as companion dog owners, with dog trainers having the next highest representation at 18% of respondents.

![Survey Respondents by Stakeholder Group](image)

**Figure 2: Survey Respondents by Stakeholder Group**

The majority of respondents were from the Perth Metropolitan Area, however representatives across the state from Broome to Esperance, and through the Wheatbelt also took part. See Appendix 1 for a diagrammatical representation of the postcodes represented in the survey.

A list of the written submissions can be found in Appendix 2. Where approval has been given, submissions have been published on the Department’s website.
Feedback on the concept of mandatory standards

Who should have to comply with minimum standards

The survey sought the community’s view on whether those who own or care for dogs should have to comply with minimum health and welfare standards.

Figure 3: Compliance with minimum standards for the health and welfare of dogs

Figure 3 shows the community indicated strong approval for the concept of minimum standards across the three proposed cohorts (the combined value of ‘agree’ or ‘mostly agree’ will be referred to as ‘generally support’ in this document):

- 93% of respondents generally support minimum standards for people who own or keep dogs.
- 95% of respondents generally support minimum standards for people who breed dogs.
- 87% of respondents generally support minimum standards for people who care for dogs in a domestic dog operation.

Figures 4, 5 and 6 depict the response to these questions between different stakeholder groups.

Figure 4: Compliance with minimum standards for dog owners by stakeholder group

Figure 4 shows veterinarians indicated the strongest general support (97%), while working dog owners expressed the lowest level of general support (86%).
Figure 5: Compliance with minimum standards for breeders by stakeholder group

Figure 5 shows all stakeholder groups showed strong (over 90%) general support for the concept that people who breed dogs should have to comply with minimum standards for the health and welfare of dogs. This aligns with results from the 2018 SPF consultation.

Figure 6: Compliance with minimum standards for domestic dog operations by stakeholder group

Figure 6 shows some variation amongst stakeholder groups in the degree of support for additional minimum standards to apply to people who care for dogs in a domestic dog operation. General support ranged from 79% (dog breeders) to veterinarians (97%).
Key themes

Common themes regarding compliance with minimum standards that were raised in comments and written submissions include:

- Dog owners are responsible for their dog’s wellbeing, and should meet minimum welfare requirements over and above basic thresholds for animal cruelty or abuse.
- Standards need to be written clearly, and enforced appropriately.
- Minimum health and welfare standards for dogs are important to ensure the proper care of dogs; feedback on specific standards is explored later in the report.
- Breeders of dogs have an even greater responsibility than dog owners to ensure that breeding dogs are cared for, and that puppies are raised in conditions that supported their development into healthy and well-adjusted dogs.
- Poor conditions for breeding dogs and puppies pose a risk to the future life of the dogs, and potentially for community safety.
- Regulation is required to stop puppy farms and prevent over-breeding which leads to unwanted dogs and dogs being surrendered to shelters.
- Standards for dog breeders who are registered with the Australian National Kennel Council (ANKC) or Dogs West are not necessary, as registered breeders must already comply with more comprehensive ANKC requirements.
- Standards which apply to all people who breed dogs ‘level the playing field’ for breeders who are registered with the ANKC.
- To reduce the risk to dog welfare, standards are needed for organisations or businesses profiting from the care or production of dogs, or where larger numbers of dogs are kept.
- The term ‘domestic dog operation’ needs to be redefined to ensure that individuals or small operations such as temporary carers or dog foster carers are not inadvertently impacted; feedback on this issue is further explored later in the report.

What you said

“If people can’t care for their dogs they shouldn’t get one. I see so many sad and neglected dogs in my area it breaks my heart. They might not be abused but they are not cared for either.”

“Agree, but government regulation should be minimal, not extensive. The standards and guidelines proposed are far too long and encroach upon people’s rights to make rational decisions about how their dogs will be handled and trained.”

“There are too many animals in WA that have not received adequate care in their earliest weeks / months as their breeders appear to have not focused on their care. Many of these end up in dog shelters with significant behavioural issues, leading to either large investments in time, effort and cost to make them homeable or, regrettably their eventual euthanasia.”

“As a Dogswest registered breeder we have a code of Ethics in relation to the keeping and breeding of our dogs. The same should apply to others such as "puppy farmers" and those who "register" with purely commercial "registers".”

“As someone who takes in rescue dogs for up to three weeks the additional standards would make it impossible to continue. Rescue dogs live with us in the same way as our pet dogs.”
Reflection of community values and expectations

The survey sought the community’s view on whether proposed standards and guidelines in the document reflect community values and expectations for the acceptable treatment of dogs.

Do you think that the proposed standards and guidelines in the document reflect community values and expectations for the acceptable treatment of dogs?

Figure 7: Community values and expectations

Figure 7 shows that 53% of respondents generally supported that the proposed standards and guidelines reflect community values and expectations for the acceptable treatment of dogs. Of the 25% of respondents who generally disagreed with this statement, responses were largely divided between those who consider that the standards and guidelines were too strict, and those who are seeking more stringent conditions.

When separated into stakeholder groups (see Figure 8), veterinarians expressed the highest level of general support at 73%, followed by pet shop owners or employees at 69%. Sporting dog owners, working dog owners, dog breeders and dog trainers indicated the least support, with 40-43% generally supporting, and 36-41% generally disagreeing, with the statement.

Figure 8: Community values and expectations by stakeholder group
Key themes

Of the 561 online survey comments to this question, 118 were generally supportive of the proposed measures, 156 considered that proposed measures were too strict, while 104 indicated that the measures were not strict enough (the balance being other issues raised). Common themes regarding community values and expectations that were raised in comments and written submissions included:

- The draft Dog Standards and Guidelines were too strict, for example;
  - the use of prong and e-collars should not be banned or restricted, and
  - the guideline recommending a limit of two hours for the crating of dogs was not practical.
- The proposed standards and guidelines seem reasonable and in the best interests of dogs.
- The draft Dog Standards and Guidelines were too lenient, for example;
  - harsher penalties should apply to people who did not properly care for dogs,
  - standards on dog breeding should be more stringent, and
  - the use of prong and e-collars on dogs should be banned.
- The enforcement of animal management and welfare laws is already under-resourced; the capacity for regulators to enforce additional animal welfare standards for dogs is under question.
- A ‘one size fits all’ approach to dog standards and guidelines was problematic. For example, many guidelines make sense for companion dogs in the city, but may not be suitable for working dogs and dogs kept in rural and remote areas.

What you said

“Yes - the feedback from the community is they want better protection for all dogs. The only way to improve the living conditions dogs are subjected to, is through legislation. Legislation needs to have minimum standards and guidelines in which prosecutions can be measured against.”

“The proposed standards and guidelines are a great step in the right direction however I have concerns about how effectively these will be policed to ensure compliance.”

“I am very disappointed at how basic the Minimum Standards are, and I believe the community expects dogs to be treated better, probably as generally set out in the recommended guidelines (which are useless as dodgy breeders will only meet the minimum standards, and the dogs will still suffer).”

“I am disagreeing as although I see most of the recommendations as common sense and helpful for the welfare of dogs, I strongly feel some recommendations, especially with regard to training and tools, will see a subgroup of dogs fall through the gaps and end up surrendered and/or euthanised. I feel the standards related to training, banning of prong collars and heavy restrictions around e-collars are based on a singular training approach and not other approaches.”

“The minimum standards are achievable, with reasonable adjustment, to many city and larger country town areas. With relation to smaller country towns, and remote communities, even the minimum standards will be a challenge for compliance and policing. The guidelines intent are admirable, however the ‘writers’ are clearly far removed from realistic remote WA.”
Costs of compliance

The survey sought to identify the community’s view on whether compliance with the proposed minimum standards in Part 2 of the draft Dog Standards and Guidelines, relating to the general care of dogs, would increase the cost of owning a dog.

Figure 9: Costs of compliance

Figure 9 shows that respondents to the online survey were divided in their views on this matter; 32% indicated that the proposed standards will increase the cost of owning a dog; with 33% indicating that compliance will not increase the cost of dog ownership.

When separated into stakeholder groups, Figure 10 shows 48% of dog breeders think that complying will increase the cost of owning a dog, followed by 44% of veterinarians. Dog trainers were divided, with 38% indicating that the proposed standards will increase the cost of owning a dog; and 33% indicating that compliance will not increase the cost of dog ownership.

Figure 10: Costs of compliance by stakeholder group
Key themes

Common themes regarding the cost of compliance that were raised in comments and written submissions included:

- Many owners and carers of dogs already achieved or exceeded the requirements of the draft standards, and the introduction of standards would not pose a cost to them personally.
- The cost of buying a puppy may increase if regulations were imposed on puppy farmers or indiscriminate breeders. However, any increase in the cost of buying or owning a dog associated with compliance to welfare standards would be justified by an increase in standards of care.
- The cost of dog ownership is already difficult for some groups, such as elderly, homeless and lower socio-economic groups. Minimum standards may make this more difficult, and further limit the opportunity for dog ownership and the benefits that this afforded members of the community.

What you said

“Most responsible dog owners follow the recommended standards anyway - there was nothing mentioned in the standards that I (as a companion dog owner) don't already do. They seem sensible without being over prescriptive or restrictive. At most, there might be extra cost to dog owners who transport their dogs in the back of uncovered utes, should they decide to buy a suitable transport crate. I don't feel that would be an unreasonable or prohibitive cost increase.”

“Hard to say, however I agree with the recommended g/l regarding breeding and follow through. Some BYB (backyard breeders) already sell their dogs for costs that mirror a well bred animal, however some sell quite cheaply so I think we’ll see a spike in initial purchases prices as breeders become the main place to buy a dog.”

“Owners that 'do the right thing' will not be impacted; as I believe responsible dog owners ensure that their dogs are microchipped, registered with the local authority, desexed and regularly vet checked. Owners that do not comply with these conditions are the same owners that Local Government would normally have compliance issues with. If the State Government 'streamline' this system to make it more accessible for all LGs to be able to access information it can increase the compliance of owners by ensuring consistency of service and delivery.”

“Additional and unnecessary training costs and veterinary intervention. This will mean that pet ownership will be the domain of the rich only. Pet ownership and developing responsibility is an important learning and socialization activity for lower income families with children. This legislation will either prevent them having pets or mean that they will be in breach of the legislation.”
Feedback on Part 2 – General care of dogs

Identification of dogs and transfer of ownership

The draft Dog Standards and Guidelines proposed a number of minimum standards in relation to the identification of dogs and transfer of ownership. Rather than duplicate the provisions in the Dog Act 1976 (the Dog Act) that cover dog control and management, the draft Dog Standards and Guidelines aim to consider the health and welfare impacts of these activities.

The survey asked respondents if they support the proposed minimum standards in Section 1, relating to the identification of dogs and transfer of ownership, and if the key issues have been adequately addressed.

Overall, there was a high level of general support (89%) for the draft standards relating to the identification of dogs and transfer of ownership of dogs (see Figure 11); and 86% of respondents agreed that the key issues had been adequately addressed (Figure 12). Amongst stakeholder groups, general support ranged from working dog owners at 78%, with veterinary nurses, and pet shop owners or employees indicating the highest general support at 95%.

Figure 11: Support for Section 1

Figure 12: Key issues in Section 1

Do you support the proposed minimum standards in Section 1, relating to the identification of dogs and transfer of ownership of dogs?

Do you think the key issues about the identification of dogs and transfer of ownership of dogs have been adequately addressed in Part 2, Section 1?

Figure 13: Support for Section 1 by stakeholder group
Key themes

As above, while the Dog Act includes provisions for microchipping and the transfer of ownership, the draft Dog Standards and Guidelines focus on the protection of dog welfare, safety and health when these activities are undertaken.

Common themes regarding dog identification and transfer that were raised or identified in comments and written submissions included:

- A lack of clarity around the role of the draft health and welfare standards for identification and transfer, and the role of the Dog Act, which regulates the control, registration, ownership and keeping of dogs.
- Issues outside the scope of health and welfare standards and guidelines included: support for the Centralised Registration System under the SPF initiative, no cost-transfers of ownership, the need to update microchip registration details and mandate scanning, and proposals for a national microchip database.
- The requirement for puppies to stay with their dams and littermates until they are 8 weeks of age could not always be met, and an experienced breeder should be able to make this decision without the need for veterinary advice. Puppies may also be kept until they are older, such as when considered for future breeding or prior to export.
- The recommendation for dogs to wear an identifying tag attached to their collar (Guideline 1.1) should be a minimum standard, to enable dogs to be easily identified.
- The recommendation for dogs to wear an identifying tag attached to their collar (Guideline1.1) poses a risk to dogs who are unable to wear a collar for health reasons.
- Proposed requirements for the identification and transfer of ownership of dogs were reasonable and common sense, however, effective enforcement is required.
- Microchipping is mandatory under the Dog Act, and should be sufficient as a means of identifying and tracing dogs.
- Microchips can fail or be scanned incorrectly; other methods may provide a more reliable method for identifying dog.
- Historically, ear tattooing has been successfully used by many breed clubs, and its use should not be restricted to a veterinarian or for the purpose of an established ear tattoo identification scheme.
- Ear tattooing is a painful procedure and should not be performed on a conscious dog. Any exemption should include require the use of topical pain-relief agents.

What you said

“I believe all dogs should be registered and micro chipped. And any relevant paperwork should be given to owner of dog. All records should be kept up to date. And breeders should maintain contact with puppies new owners.”

“No issues at all. Dogs should be microchipped prior to sale and puppies should not be sold before 8 weeks of age. Far too many unregulated backyard breeders selling puppies at 6 weeks of age with no chip or vaccine. The question is, HOW is the government going to enforce this?”

“Tag attached to the collar of the dog with current owner details should be mandatory. I see no need for the use of tattoos when a chip can be used.”
Housing and transport of dogs

The draft Dog Standards and Guidelines proposed a number of minimum standards in relation to the housing and transport of dogs, including crating and tethering of dogs.

The survey asked respondents if they support the proposed minimum standards in Section 2 relating to the housing and transport of dogs, and if the key issues have been adequately addressed.

82% of respondents generally support the proposed minimum standards relating to housing and transport of dogs (see Figure 14), and 78% of respondents thought the key issues had been adequately addressed (Figure 15). Amongst stakeholder groups (Figure 16), veterinarians expressed the strongest general support at 96%, followed by local government employees at 95%. Sporting dog owners, dog breeders and working dog owners indicated the lowest level of general support at 61%, 63% and 64% respectively.
Key themes

Responses to the consultation revealed the need to clarify that draft housing standards were not intended to apply to temporary confinement during transport or veterinary care. Common themes regarding the housing and transport of dogs raised or identified in survey comments and written submissions are summarised below.

Themes on housing, including crating and tethering:

- Crating is a valuable means of confining dogs, and enables unsupervised dogs to be housed safely. A recommended limit of two hours crating during the day was too short (Guideline 4.1), especially for anxious dogs, or dogs crated at dog shows and events.
- Dogs are kept in a wide variety of ways, and the use, breed and individual nature of dogs will influence their particular needs. A 'one size fits all' approach can be problematic. For example, the tendency of some dogs to chew and ingest fabric could affect compliance with draft standards for dog bedding.
- The Dog Act already sets out requirements for kennel licences, including kennel dimensions through dog local laws.
- The requirement that a dog must not be tethered ‘outdoors in extreme weather conditions' (Standard 5.1(d)), is not practical, in particular for farming dogs. It should be noted that, although extreme weather is not defined in the document, these respondents took ‘extreme weather' to mean temperature ranges outside of 15-30 degrees.
- Daily exercise requirements for tethered dogs may not be practical, and should be consistent with requirements for dogs kept in other types of housing.
- A dog’s exposure to loud noises (Guideline 3.5) was often out of the owner’s control.

Themes on transport:

- The recommendation that dogs should be transported and handled in a manner that minimises stress, for example drivers should drive with care, and try to minimise bumps, jolts and swerving during the journey (Guideline 6.7) was not practical.
- Dogs should be suitably restrained when transported, including restraint by a seatbelt or harness when transported in a car.
- Some standards are impractical for dogs on farms and should only apply on public roads.
- Transport of dogs on the back of utes should require dogs to be restrained by a harness or in a crate; dogs shouldn’t be tethered by their collar.
- Transport under a tonneau cover may provide protection from weather for crated dogs.
- Space allowance for dogs in transport crates should be mandatory.

What you said

“I agree with all standards. I do not agree with the implication that crating a dog further than 2 hours at a time is at detriment to the dog’s health, as it is not. But technically speaking, the standard which is not to crate a dog longer than is detrimental to the dog, I am all for.”

“The issue with containment is that this “regulation” does not take into account various individual circumstances. A dog maybe a nuisance barker, digger or fence scaler and crating maybe the only alternative. Further dogs are safely crated or tethered when in areas they can not be otherwise safely contained such as at sporting events or camping. Then dogs with injuries that may require months of rehab need to be considered.”

“Dogs should never be allowed to travel on the back of a Ute no matter the weather conditions or tie downs. It's just too dangerous.”

“Again, all the elements of common sense are there, BUT again the education of people hasn't been outlined and it is that which will ensure the adherence to these Standards and Guidelines.”
Minimum enclosure sizes

Table 1 of the draft Dog Standards and Guidelines proposed minimum dimensions for dog enclosures, in recognition that enclosure size can impact the welfare of dogs. The proposed dimensions were based on existing standards in other jurisdictions, RSPCA WA policy and consideration of requirements under dog local laws. Advice from rural stakeholders was also considered when proposing dimensions for raised livestock working dog kennels.

The survey asked respondents if they support the proposed minimum enclosure sizes set out in Appendix 1 of the draft Dog Standards and Guidelines. The views of the community were also sought on the preferred transitional arrangement, if this became an enforceable requirement.

Overall, 73% of respondents generally supported the proposed minimum enclosure sizes. Local government employees expressed the highest general support at 85%. Working dog owners conveyed the least general support at 56%. All stakeholder groups expressed a preference for minimum enclosure sizes to be phased in over 5 years (see Figure 20). Veterinarians expressed the most support for this option at 57%. Dog breeders were divided, with 24% generally supporting this option, while 20% believe that enclosure sizes should not be enforced.

- Do you support the proposed minimum enclosure sizes for dogs, set out in Appendix 1?
  - Agree 47.1%
  - Mostly agree 14.2%
  - Neither agree nor disagree 9.4%
  - Mostly disagree 11.9%
  - Disagree 5.5%
  - Unsure 7.8%

- If minimum enclosure sizes for dogs are to be enforceable, what arrangement should be made for making these a requirement by law?
  - To only apply to enclosures built after the law is passed 9.9%
  - To be phased in over 5 years 14.2%
  - To be phased in over 10 years 16.8%
  - I do not agree that minimum enclosure sizes should be enforceable 11.9%
  - Unsure 41.8%
  - Other (please specify) 3.3%

Figure 17: Support for enclosure sizes

Figure 18: Phase in arrangements

Figure 19: Support for enclosure sizes by stakeholder group
Key themes

Common themes regarding proposed minimum housing, and transitional arrangements for their implementation, raised in comments and written submissions included:

- Set housing dimensions do not allow for differences in the way dogs are kept or worked, or the nature of individual dogs. A 'one size fits all' approach is not appropriate.
- Proposed minimum enclosure sizes were too small, and needed to be larger to ensure the welfare and quality of life for dogs housed for extended periods in enclosures.
- Proposed minimum enclosure sizes should apply to all dogs, and exceptions for working dogs housed in raised kennels should not be given.
- Enclosure height dimensions may not be necessary for smaller dogs, or covered enclosures.
- Regarding transitional arrangements for minimum enclosure size;
  - Due to cost implications, this requirement should be phased in, or only applied after the law was passed.
  - This requirement should be implemented immediately or over 12 months.

What you said

“Size of the dog should not be the only factor that determines the amount of area needed. The activity/energy levels of certain breeds are at odds with their size.”

“I think there should be a minimum standard for those that do keep their dogs in enclosures, but like others, our dogs are our family and run our house and have access to inside and out at all times.”

“Dogs need to be able to toilet away from sleeping/rest areas, in my opinion the minimum enclosure sizes do NOT allow that.”

“I have working dogs. Their current raised runs have individual floor spaces of 1.8m x 0.9m (which will not meet the new 2.0 square metre requirement). This size is perfectly adequate for even my largest working dog. I would be uncomfortable putting him in something smaller as a permanent housing option though. 180 cm minimum height is overkill if an enclosure is roofed - makes sense if a dog can potentially jump out though.”
Health and husbandry of dogs

The draft Dog Standards and Guidelines proposed a number of minimum standards in relation to the health and husbandry of dogs, including; health and veterinary care, food and water, body condition, behaviour and training, exercise, restraint, electronic collars and euthanasia.

The survey asked respondents if they support the proposed minimum standards in Section 3, relating to the health and husbandry of dogs, and if the key issues have been adequately addressed.

The community’s feedback on draft standards relating to dog health and husbandry indicated stakeholders were more divided on this section. Further analysis indicated that this largely reflects divergent views on the use of electronic collars (e-collars) and prong collars. As seen in Figure 21, 66% of the respondents generally supported the proposed minimum standards. Veterinarians and veterinary nurses expressed the most support at 85% and 81% respectively. Dog trainers and working dog owners were divided, with 60% and 49% expressing general support respectively.

Figure 21: Support for Section 3

Figure 22: Key issues in Section 3

The community’s feedback on draft standards relating to dog health and husbandry indicated stakeholders were more divided on this section. Further analysis indicated that this largely reflects divergent views on the use of electronic collars (e-collars) and prong collars. As seen in Figure 21, 66% of the respondents generally supported the proposed minimum standards. Veterinarians and veterinary nurses expressed the most support at 85% and 81% respectively. Dog trainers and working dog owners were divided, with 60% and 49% expressing general support respectively.

Figure 23: Support for Section 3 by stakeholder group
Key themes

The majority of the comments on Section 3 related to the proposed restrictions on prong collars and e-collars; these are presented later in this report. Other key themes raised in the survey comments and written submissions are summarised below.

Themes on health and veterinary sections:
- ‘Checking a dog’ is part of the daily interaction between owners or carers and their dogs, and it should not be necessary to include this as a standard.
- The health status and feeding habits of individual dogs may prevent compliance with specific feeding standards.
- There is an over-emphasis on requirements for veterinary input, which will increase costs of ownership. For example, minor health issues could be dealt with by an owner.
- Standards requiring an owner to seek veterinary care for dogs should be strengthened. For example, a vet should be consulted at any sign of pain, distress, deteriorating health, not just those set out in Standard 7.2.
- Surgical alteration procedures should be tightly regulated or prohibited. For example, debarking procedures should be banned altogether, not restricted as per Standard 7.4.
- Tail docking should be referenced in the standards and guidelines, as well as in existing regulations.
- Vaccinations should be a standard for all dogs, not just breeding dogs.
- Antibody titre testing should be included as an alternative to vaccinations.

Themes on behaviour and training:
- The document should note that it is important to start puppy socialisation prior to the puppy being fully vaccinated.
- The recommendation that training should focus on reward-based techniques (Guideline 10.2) does not allow for situations where other techniques might be more appropriate.
- All training is reward-based, whether or not aversive techniques are used.
- The recommendation that training should be discontinued or modified if it causes a dog to be anxious or distressed (Guideline 10.5) does not accurately reflect how dogs learn, and may inhibit training.
- Most veterinarians do not have sufficient knowledge of dog learning and training theory to provide advice on behavioural issues.

Themes on euthanasia:
- Firearms are deemed a humane method of euthanasia, and their use should not be restricted to when access to a veterinarian is limited.
- Euthanasia must not be carried out in view of other animals.

What you said

“Daily checking, during grooming or patting, as well as being aware that behaviour change may indicate pain or discomfort, is integral to maintaining the health and wellbeing of any animal.”

“Vaccination and preventative medication (e.g. worming, flea prevention) should be a Standard not a Guideline; i.e. a requirement, not advice.”

“it would be good to add that dogs should be cared for on an emotional level, rather than just getting their basic needs met. eg free time for working dogs, breeding dogs should be petted and talked to, some exercise should be off leash so dogs can freely do what dogs do.”
**Prong collars**

A prong collar is a chain made of metal or hardened plastic links with prongs for positioning against the neck on each link (also called pinch collars). The online survey sought the community’s views on the draft proposal that “Prong collars must not be used on a dog” (Standard 12.2).

**Figure 24: Support for prong collar proposals**

The answers to this question were divisive, particularly between stakeholder groups. Figure 24 shows almost 60% of the respondents agree with the proposal to ban prong collars, with 32% disagreeing with the proposal. Veterinarians expressed the strongest general support for a ban at 82%, while 14% disagreed with the proposal to ban prong collars. 56% of dog trainers support a ban, and 43% disagree with the proposal. Sporting dog owners showed the lowest support at 40%, with 57% disagreeing with the proposal to ban the devices.

**Figure 25: Support for prong collar proposals by stakeholder group**

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Do you agree with the proposal to ban the use of prong collars?

- **Agree**
- **Mostly agree**
- **Neither agree nor disagree**
- **Mostly disagree**
- **Disagree**
- **Unsure**
Key themes

The use of prong collars on dogs is a highly contentious issue, with those both for and against the restraint devices putting forward strong arguments to support their view. Key themes raised in the survey comments and written submissions are summarised below.

- For larger or powerful dogs, or those that are highly motivated or reactive (to other dogs, animals or people), the use of prong collar can enable safe control. This was particularly important for the elderly or physically impaired members of the community, and met their legal obligations under the Dog Act to control their dogs.
- The use of a prong collar can improve the welfare of a dog by allowing dogs to be exercised and experience a better quality of life, and preventing unnecessary euthanasia.
- Public perception that prong collars are inhumane is ill-informed; a prong collar is designed to apply pressure evenly around the neck, rather than allowing a single area of pressure on the neck as seen with flat collars or choke chains.
- Inexperience and misuse of prong collars can cause welfare issues. Any use of the collar should be informed by training or a certification to use, and dog trainers should be qualified to instruct proper use of these collars.
- Prong collars on a dog can pose a risk of physical and psychological harm to a dog and their use on a dog should be banned.
- Modern animal behaviour science does not support the use of aversive training methods. Research indicates that other methods can be as effective, while promoting a positive dog/handler relationship.

What you said

“They work. I just helped a gentleman in his 80s have a totally relaxing walk with his bearded collie once the harness was gone and pinch collar was on. There wasn’t a single correction. These collars work when people are older, weaker, unwell, or their dog out weighs them. Science is showing that many elderly people are being injured walking their dogs. Banning this equipment would only increase that further.”

“Yes they can be VERY dangerous if available to everyone, however if access to prong collars is limited to training professionals to prescribe after behavioural and owner assessment then they can be a very valuable tool… They can be misused but I think they need to regulated and only able to be obtained through professionals who can monitor who has access to them.”

“Although effective in modifying dog behaviour, there is a better way to train dogs. Like advances in technology, dog training is a science, and methods must be up to date. Current best scientific practice does not require the use of such training tools. If such tools were not banned, it would be a massive contradiction to the aims and goals set out to achieve in improving the health and welfare standards of pets and animals in Western Australia.”

“As a qualified trainer of almost 20 years who has worked in a variety of disciplines - I have never needed to use such equipment and will never do so. In order to be effective such equipment must be averse to the dog - ie it is painful. There are other alternatives which do not use such painful methods and that improve relationships with people. I strongly support the banning of prong collars.”
Electronic collars

The draft Dog Standards and Guidelines defines electronic collars (e-collars) as collars that are “used to modify behaviour through the delivery of a stimulus, including but not limited to an electric shock, citronella spray, vibration, water vapour, air pressure or tone, and includes electric training collars and electrical devices known as the “invisible fence”. Currently the use of ‘electric shock’ collars is regulated under the Act; that is, they may be used in accordance with the “generally accepted manner of use”. The draft Dog Standards and Guidelines seek to provide further detail about the “generally accepted manner of use”. The Act does not currently impose any restrictions on the use of citronella or other types of e-collars.

The use of e-collars for dog training and management is controversial, and members of the community who own and work with dogs are divided in opinion on their use. A number of questions in the online survey sought to establish the community’s view on the use of e-collars on dogs. The online survey received over 1600 comments that addressed the use of e-collars on dogs for training, containment or to inhibit barking.

Figure 26: Acceptability of using electric shock collars

Do you think it is acceptable to use an electric shock collar on a dog to:

<table>
<thead>
<tr>
<th>Activity</th>
<th>Yes</th>
<th>In some circumstances</th>
<th>No</th>
<th>Unsure</th>
</tr>
</thead>
<tbody>
<tr>
<td>train a dog (remote training)</td>
<td>47.9%</td>
<td>29.7%</td>
<td>1.5%</td>
<td>20.9%</td>
</tr>
<tr>
<td>contain a dog (invisible fence)</td>
<td>42.3%</td>
<td>31.6%</td>
<td>1.6%</td>
<td>24.8%</td>
</tr>
<tr>
<td>inhibit barking (anti-barking collar)</td>
<td>47.0%</td>
<td>24.7%</td>
<td>2.7%</td>
<td>25.6%</td>
</tr>
</tbody>
</table>

Figure 27: Acceptability of other types of electronic collars

Do you think it is acceptable to use a vibration, spray or sound collar (e.g. citronella) but not an electric shock collar on a dog to:

<table>
<thead>
<tr>
<th>Activity</th>
<th>Yes</th>
<th>In some circumstances</th>
<th>No</th>
<th>Unsure</th>
</tr>
</thead>
<tbody>
<tr>
<td>train a dog (remote training)</td>
<td>32.8%</td>
<td>28.8%</td>
<td>4.9%</td>
<td>33.6%</td>
</tr>
<tr>
<td>contain a dog (invisible fence)</td>
<td>37.6%</td>
<td>28.9%</td>
<td>4.3%</td>
<td>29.2%</td>
</tr>
<tr>
<td>inhibit barking (anti-barking collar)</td>
<td>35.3%</td>
<td>32.8%</td>
<td>4.4%</td>
<td>27.6%</td>
</tr>
</tbody>
</table>
Overall, approximately 50% of respondents believe it is generally acceptable to use an e-collar that delivers a ‘shock’ to inhibit barking and to train a dog. Containment, or invisible fence collars received the highest support at 56% (see Figure 26). Figure 27 shows that other types of e-collars received marginally higher support when compared to collars which use ‘electric shock’, with 58 to 62% of respondents agreeing that their use is generally acceptable.

Do you think the proposed standards outlining the use of electronic collars on dogs are adequate to safeguard dog welfare?

- Yes
- No, the conditions should be modified
- No, electronic collars should be banned
- Unsure

If electronic collars are restricted or banned, will complying with this regulation require you or your organisation to change how you operate?

- Yes
- No

Figure 28: Support for e-collar proposal Figure 29: Compliance with e-collar proposal

Overall, 25% of respondents think the proposed standards outlining the use of e-collars are adequate to safeguard dog welfare. By comparison, 29% think the conditions should be modified, and 36% think e-collars should be banned (Figure 28). When stakeholder groups are compared, dog breeders showed the most support for the proposed draft standards at 38%, followed by 34% of local government employees. Veterinarians and veterinary nurses indicated the strongest preference for a ban on e-collars, at 56% each.

33% of respondents said that complying with the proposed regulation will require a change to how they operate. The remaining 67% of respondents said that complying with the proposed regulation will not require a change to how they operate. This may be because they do not use e-collars, or because they already comply with the proposed standard.

Do you think the proposed standards outlining the use of electronic collars on dogs are adequate to safeguard dog welfare?

- Yes
- No, the conditions should be modified
- No, electronic collars should be banned
- Unsure

Figure 30: Support for e-collar proposals by stakeholder group
Key themes

Key themes raised in the survey comments and written submissions are summarised below.

- The term ‘electric shock’ misrepresents the way these collars worked; modern collars used electrical stimulation to cause muscle constriction, and do not deliver a shock.
- The use of e-collars on otherwise ‘uncontrollable’ dogs provides such dogs with greater freedom and opportunity to exercise. Without this option, many dogs would be euthanased or rehomed.
- E-collars can keep dogs from escaping their property, reduce nuisance barking and correct behaviours that may risk a dog’s safety.
- Different types of collars vary in their aversiveness. Vibration collars are less aversive, and can be useful for communicating with deaf dogs. Citronella can be more unpleasant to a dog by remaining on the coat long after the triggering behaviour (e.g. barking).
- E-collars are cruel, or inhumane, devices. Dog owners have a responsibility to use training methods that will not harm their dog.
- Modern animal behaviour science shows the use of e-collars causes harm, and alternative training methods can be as effective without the negative effect on dogs.
- Dog handlers need to be educated and supervised (initially) by a qualified trainer to ensure correct use of e-collars.
- Requirements for the trial of other methods prior to e-collar use may not be appropriate in all circumstances, such as containment of dogs and snake avoidance.
- Veterinarians must be involved in the decision to use an e-collar.
- Veterinarians do not have sufficient expertise in dog training to make decisions on suitability of a dog to wear an e-collar.
- The use of a good quality e-collar is essential, and collars must be compliant with the Electronic Collar Manufacturers Association™ (ECMA).
- While e-collars should not be left on unsupervised dogs during the introduction period, the recommendation that an e-collar should not be left on an unsupervised dog (Guideline 13.1) was impractical for anti-bark or containment collars.

What you said

“If e-collars were banned, my own dog’s quality of life would be dramatically reduced as it would limit the freedom she currently safely enjoys. I would be greatly impeded in my efforts to comply with the requirement in the Dog Act maintain control of my dog. The dog training club of which I am a volunteer instructor would be unable to offer training as we do now.”

“People in high density living get many more complaints about barking dogs and in many instances are forced to give them up if they can’t train the dog not to bark. Short term use of a vibration, spray or sound collar is a good way to help train a dog out of incessant barking as it does not cause long term damage, just short term discomfort.”

“As a qualified trainer with 40+ years under my belt, I see no reason to use e-collars of any type for any reason. I have seen the abuse by trainers who can’t control their temper or ego. Again our industry is not regulated so anyone can call themselves a dog trainer and I have seen some really bad training over the years and its abuse.”

“These collars should be regulated. They do have a use, but could be abused or simply the owner may not be aware of adverse reactions/ suffering. They could be teaching and hearing (for deaf dogs) aids. Regulated and restricted use.”

“Vibration with training yes, ease the dog into it under professional guidance, citronella NO, it can affect their sense of smell, hurt their eyes, high pitched noise, NO, it hurts their ears.”
Breeding of dogs

Minimum health and welfare requirements for breeding dogs and puppies is an important component of the draft Dog Standards and Guidelines; this is one of four measures of the WA Government’s Stop Puppy Farming (SPF) initiative. Dog breeding standards and guidelines were informed by existing regulation in other jurisdictions, scientific evidence, and are aligned, where appropriate, with Dogs West policy. The survey sought the community’s view on the proposed minimum standards set out in Part 2, Section 4 of the document.

The online survey results (Figure 31) show that 77% of respondents generally support the proposed minimum standards relating to the breeding of dogs, with 73% (Figure 32) indicating that the key issues relating to the welfare of breeding dogs have been adequately addressed.

Responses from stakeholder groups (Figure 33) show that veterinarians and veterinary nurses expressed the highest level of general support for the draft standards at 89%, closely followed by pet shop owners or employees at 88%. 77% of rescue organisation employees or volunteers, and 64% of dog breeders generally support the draft standards.

Figure 31: Support for Section 4

Figure 32: Key issues in Section 4

Figure 33: Support for Section 4 by stakeholder group
Key themes

Common themes regarding the breeding of dogs that were raised or identified in survey comments and written submissions are summarised below.

Themes on general breeding matters:

- Standards for breeding dogs should be more stringent to reduce welfare issues associated with indiscriminate breeding and the oversupply of puppies and dogs.
- Compliance with breeding standards for the welfare of dogs and their puppies is dependent on mandatory registration (under the Stop Puppy Farming initiative).
- Adequate resources to monitor and effectively enforce compliance to standards is essential to achieve welfare benefits for breeding dogs.
- The requirement for all breeders, including ‘backyard breeders’ to comply with standards is a positive measure.
- Registered (Dogs West) breeders already have to comply with more comprehensive Australian National Kennel Council (ANKC) and Dogs West Codes of Ethics, so should not need to comply with additional standards.
- Generalised standards may not be reasonable for different types and breeds of dog. For example, toy breeds have smaller litters and may require different management practices, such as vaccination and worming at a later age.

Themes on specific breeding issues:

- Unless specific evidence showed a welfare risk, the minimum age of breeding a male dog should be nine months, and recommendations not to breed with a bitch over five years of age (when not previously bred) should be amended.
- Providing meals at regular intervals is preferred for lactating dams, rather than free-feeding.
- Breeding stands can protect the welfare of mating dogs, especially the male, and should not be banned.
- Genetic screening was essential to the breeding of healthy dogs, additional regulation covering the breeding of dogs for exaggerated features and genetic issues is required.
- The ability to breed closely related dogs is important for rare breeds.

What you said

“Until a final decision is made on Dog Breeding registrations, how and who is to enforce. Then the following standards are hard to give feedback on. ie ANKC breeders are Registered with Dogswest so they have very strong guidelines rules and regulations to follow; do they now need to be registered elsewhere and do these new rules coincide with those of the ANKC. Note Breeders registered with ANKC must sit and pass an exam as well as associated fees and annual fees.”

“I agree with everything in the minimum standards, but I would like to see stricter regulations for anyone who wants to breed dogs, allowing an inexperienced person the ability to make money from two litters of puppies, every year without a licence or some sort of inspection, can result in animal cruelty. In my opinion, if a person is breeding dogs with the intention of selling them, then they should hold a licence to do so.”

“If there must be breeders they should have regular visits and provide continuous evidence that all welfare issues are being met.”

“It should be necessary for breeders to ensure that breeding pairs are free from genetic issues. Dogs and breeds of dogs affected by health problems stemming from genetic causes breathing problems, being susceptible to heat stress, exercise intolerance, eye problems, dental disease, skin infections and spinal deformities must be prohibited from being bred.”
Litter limits

The community’s view on proposed dog litter limits was also sought.

83% of respondents generally support a restriction on the number of litters a bitch should produce in her lifetime (Figure 34). Pet shop owners or employees expressed the most support for a litter limit at 94%, followed by veterinary nurses at 89% and rescue organisation employee or volunteers at 88%. 71% of working dog owners and 64% of dog breeders also indicated general support (Figure 36).

Figure 35 depicts responses to the preferred number of litters a bitch should be allowed to produce. A limit of three litters gained the most support (32%), while 17% of respondents indicated four litters was an acceptable upper limit for a bitch to produce in her lifetime. When separated into stakeholder groups (Figure 37), a four litter limit gained the most support from dog breeders (at 30%), while 14% of dog breeders do not support restrictions on litter number.
If you agree that the number of litters that a bitch can produce should be restricted by law, how many litters do you think it is reasonable for a bitch to produce in her lifetime?

Figure 37: Suggestions for litter limits by stakeholder group

Key themes

Common themes raised or identified in survey comments and written submissions included:

- Limiting the number of litters a dog can produce is an important means to reduce dog overpopulation, and the large number of unwanted or surrendered dogs in shelters.
- Litter limits are too prescriptive; any decision should be based on the health of the individual bitch.
- The difference in litter limits in draft Guideline 15.3 (four litters), compared to draft Standard 15.3 (five litters) is confusing.

What you said

“I believe that there is sufficient evidence to indicate that the industry has not been able to self regulate and to ensure the health and welfare of the dogs (hence this survey and proposed standards). While there are some breeders who put the welfare of their bitches first, others do not. It is because of those who do not that we need the law to step in. My past dog was a pure bred champion breeding bitch. She had puppies every single time she came into season until she was 7 years old! That is too many puppies!”

“Overbreeding is a big problem, and I don’t believe those breeding dogs can always be trusted to understand what is best for the bitch. Restricting the number of litters a bitch can produce by law is a good way to enforce a basic level of welfare and reduce the number of pups produced.”

“I don’t think it should be restricted providing the bitch gets medical examinations before every further pregnancy after giving birth to a litter.”

“Dogswest requires approval for a sixth litter. There are situations where this can be acceptable. For instance if the bitch has had very small litters or if the genetics of the bitch are of benefit to the health of the breed.”
Feedback on Part 3 – Domestic dog operations

Definition of domestic dog operation

Part 2 of the draft Dog Standards and Guidelines apply to all people with responsibility for the care and management of dogs, in private and commercial settings. Part 3 sets out additional requirements that ONLY apply to a domestic dog operation.

The draft Dog Standards and Guidelines propose that a domestic dog operation is defined as:

- a person who owns five or more fertile bitches that are kept for the purpose of breeding and selling dogs;
- an animal shelter or pound;
- a pet shop; or
- a premise at which dogs are boarded, trained, or kept overnight or during the day, whether the operator receives a payment or not.

The survey asked the community’s view on this definition of a domestic dog operation, requested detail on how this may impact on the respondent, and sought alternative suggestions. It is worth noting that the definition does not propose an upper limit to the number of fertile bitches a breeder is allowed to keep. However, requirements under the Dog Act and dog local laws will still apply.

Overall, response to the consultation recommends further consideration of the draft definition, and scope of ‘domestic dog operations’. Notwithstanding this feedback, it is notable that the additional standards set out in Part 3 were generally well supported, including by individuals and organisations that would potentially be required to implement them.

As Figure 38 shows, 76% of respondents generally support the current definition of a domestic dog operation.

Key themes

Common themes on the definition of ‘domestic dog operation’ raised in survey comments and written submissions are summarised below.

Themes on dog breeders under the ‘domestic dog operation’ definition:

- The proposal that Part 3 requirements should apply to a person that owns five or more fertile bitches kept for the purpose of breeding and selling dogs is not strict enough;
thresholds from one to four breeding dogs are more appropriate to ensure welfare of breeding dogs.

- Five fertile females was too limiting; breeders frequently kept younger and older dogs, who may be non-breeding fertile females.
- The keeping of unsterilised dogs for reasons other than breeding should not be regarded as a domestic dog operation; for example, working dog teams, sled dog teams, or show dogs, who are generally not able to be shown if sterilised.
- Arrangements where dogs are owned on ‘breeders terms’ (where a dog breeder retains the right to breed from a dog cared for or owned on a separate property) may also need to be clarified.

Themes to further clarify the definition:

- Private individuals looking after a friend’s dog overnight, for example, could be considered a domestic dog operation, and should be excluded.
- Veterinary clinics may be captured under the definition of domestic dog operation, and should be excluded.
- For-profit and not-for-profit operations vary in their motives for housing dogs; covering such different activities under the one framework is problematic.
- Commercial activities should be more closely regulated, while dog shelters, rescue operations and pounds should be excluded or dealt with separately.
- The size of operation should be distinguished, or Part 3 requirements separated into individual standards and guidelines for different industries.
- ‘Operation’ and ‘domestic’ did not seem to adequately reflect the intended meaning of the term.

What you said

“I believe anyone with over 3 or more dogs kept for breeding should qualify as a domestic operation, as that potentially results in a pregnant dog or puppies being present all year round.”

“I have a number of under and over aged entire bitches, they are fertile but I am bound by the Rules of the ANKC and I am not going to breed from them. Based on my research of modern science the evidence no longer supports sterilisation of animals and, in fact, has identified a number of health. I can see this legislation capturing people it does not intend to. While I am a domestic operation by your definition I am already governed by Local Government requirements and also ANKC rules.”

“I think there should be separate minimum standards for breeders. A shelter/pound/kennel does not carry the same risk of exploitation as a puppy farm does.”

“A commercial kennelling operation should be treated differently to a rural property that breeds working dogs. You need to make that distinction. Maybe a blanket disclaimer for the whole proposal that this act is for urban areas and commercial breeding and kennelling operations. Let rural and sporting dog owners have their own set of rules that make sense for them.”

“Doggie day care should have a separate guideline. It’s become popular in recent years and a lot of them are run by lay people, which cause a lot of concerns (potential behavioural issues and physical injury through fighting). The fact that they mix many dogs together in a confined area for extended period of time means a lot of supervision and monitoring is needed, I doubt they are following any concrete guideline or knowledge at the moment. Dog owners should be made aware of the potential adverse effects to their dog’s mental health of attending doggie day care as well.”
Impact on businesses

The survey sought to ascertain the impact that Part 3 additional minimum standards for domestic dog operations may have on businesses, and whether the standards are likely to have a disproportionate impact on small business compared to medium and large business.

Considering the definition of domestic dog operation above, is it likely that the proposed minimum standards will apply to you (or members of the organisation that you belong to)?

![Pie chart showing 28.0% "Yes" and 72.0% "No" responses.]

Do you think that these standards are likely to have a disproportionate impact on small business compared to medium and large business?

![Pie chart showing 28.7% "Agree", 17.7% "Mostly agree", 9.9% "Neither agree nor disagree", 21.7% "Mostly disagree", 4.5% "Disagree", and 17.5% "Unsure" responses.]

Figure 39: Domestic dog operation application

Figure 40: Impact on small business

Figure 39 reveals that the Part 3 of the draft Dog Standards and Guidelines would apply to 28% of respondents. Trainers and breeders were the largest group of stakeholders responding to this section (Figure 41). The ‘does not apply’ category has been removed from Figure 41 to best show the representation of respondents that consider themselves a domestic dog operation. Figure 40 indicated that respondents were unsure or equivocal about the impact of the Part 3 Standards on small business.

Please check any of the below categories that apply to your domestic dog operation.

<table>
<thead>
<tr>
<th>Category</th>
<th>0%</th>
<th>5%</th>
<th>10%</th>
<th>15%</th>
<th>20%</th>
<th>25%</th>
<th>30%</th>
<th>35%</th>
</tr>
</thead>
<tbody>
<tr>
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Figure 41: Respondents by category of domestic dog operation
Key themes

Common themes regarding the impact on small business from Part 3 requirements that were raised or identified in survey comments and written submissions are summarised below.

- The definition of ‘domestic dog operation’ needs refining to avoid unintended outcomes. For example, foster carers of dogs could inadvertently be affected by this definition.
- The wide range of businesses that are covered under ‘domestic dog operation’ makes it difficult to determine the impact of the draft standards on small business.
- The standards are reasonable requirements, and will already be met or exceeded by most domestic dog operations.
- The welfare of dogs warrants any potential impact. However, smaller businesses should be given time to comply. There is likely to be some cost impost on small businesses; training, staffing and administration costs could increase.
- Boarding kennels were already operating on marginal profits, and compliance with Part 3 standards would further challenge this.
- Compliance with Part 3 requirements would be onerous for particular groups such as small hobby breeders, or not-for-profit dog clubs, and would risk their closure.

What you said

“Reputable "dog operation" business are conforming to these standards already.”

“They should be doing these minimum standards already as a matter of good husbandry. If you are making a profit or a living from breeding dogs, these standards should not just be recommendations but mandatory requirements. We regulate other businesses in our community and dog breeding should be no exception.”

“This is definitely the case as large business have primarily established these practices already. Small businesses should be given some time to comply, but are in no way less responsible for maintaining standards than large businesses. Any businesses that suffer major implications from this were already problem organisations.”

“The minimum standards are not unreasonable, nor will they likely increase costs of existing facilities that operate with dog welfare in mind. This is from my experience of running the day to day operations of an animal shelter. Yes costs for "backyard breeders" are likely to increase, but isn't that the point? Bettering the welfare of the dogs in these situations.”

“We are a small boarding business and will consider closing down if we are forced to comply with additional standards in addition to what the local Council already has in place.”

“The documentation, fire-fighting, and facilities requirements would be onerous, if not impossible to comply with, for individuals looking after friends' or relatives' dogs and not-for-profit dog clubs that meet at public places. The not-for-profit club that I volunteer at probably could not continue to operate under those conditions.”
Additional administrative requirements

The draft Dog Standards and Guidelines propose additional administration requirements for domestic dog operations. The survey sought the community’s view on these proposed minimum standards, and the expected impact of compliance, including cost estimations.

Figure 42: Support for Part 3, Section 2

Overall, 71% of respondents generally agree with the proposed additional standards relating to administrative requirements for domestic dog operations (see Figure 42), including strong support from pet shops (80%), day care centres for dogs, local government pounds and animal shelters (see Figure 44). 54% of dog breeders that considered they may fall under the draft definition of domestic dog operation generally supported the proposed requirements.

44% of local government pound respondents consider that they will have to change how they operate in order to comply, followed by 37% for breeders (Figure not shown). Conversely, 80% of respondents associated with pet shops consider that they will not have to make any operational changes to comply. 6% of animal shelter respondents indicated they will have to make some changes, compared to 58% who do not consider that operational change would be required.

Figure 43: Operational change (Section 2)

Figure 44: Support for Part 3 Section 2 by category of domestic dog operation
Key themes

Common themes on the additional administration requirements for domestic dog operations include:

- The draft standards seemed reasonable; a large proportion of operations already comply with the standards. Some businesses may need to make minor changes to existing administration practice, but this was not considered to be onerous.
- Adequate capacity and resources to monitor domestic dog operations and enforce the standards was essential.
- As kennels already must comply with local government requirements, the interaction between draft standards for domestic dog operations and requirements under the Dog Act need clarity; future changes to the Dog Act under the SPF initiative would impact on reporting requirements such as the registration of breeders, breeding dogs and their litters.
- The administrative burden posed by the additional requirements for domestic dog operations, or compliance to guidelines, is unrealistic for some smaller dog operations or individuals that fall under the definition.
- Some guidelines should be elevated to standards, particularly those related to a Dog Health Management Plan, Emergency Management Plan and record keeping.
- A higher staff to dog ratio (than the proposed ratio of one animal attendant to 25 dogs) and staff training is important to ensure dog welfare in a domestic dog operation.
- Complying with the current recommendation for acceptable staffing levels (Guideline 17.5) and staff training would have a high cost impact on business including local government pounds, and may make some businesses unsustainable.

What you said

“The minimum standards are reasonable but who will monitor and implement and determine what level of compliance is required. Working in a highly regulated industry I see how guidelines become a requirement increasing costs to small operators.”

“Our dog training practices are already subject to internal guidelines ensuring safe equipment is used.”

“Procedures have to be rewritten, A Pound Officer might be employed to keep track of Pound. Cost will be most likely passed on to the rate payer with higher fees and charges.”

“Our boss will have to hire more people and employ them correctly (regarding hours, pay, awards, etc.) These standards will change our workplace for the better and allow us to care for the dogs to a higher standard.”

“Additional veterinary visits. Significant and unnecessary paperwork. There needs to be an option for small breeders that have more than 5 fertile bitches but less than 25 dogs.”

“Costs as yet not known. Possible exercise area needed, never needed but the possibility could arise leaving us contravening the new laws.”
Additional housing requirements

The draft Dog Standards and Guidelines propose additional housing requirements for domestic dog operations, including; minimum housing conditions, biosecurity and isolation areas, and transport. The survey sought the community’s view on these proposed minimum standards, and the expected impact of compliance, including cost estimations for implementation.

Figure 45: Support for Part 3 Section 3

Figure 45 shows that overall, 73% of respondents generally support the proposed additional standards for housing requirements for domestic dog operations. A significantly high level of support was shown in a number of stakeholder groups that would likely fall under the definition of ‘domestic dog operation’ (see Figure 47). For example, over 90% of local government pounds, animal shelters and day care operations all generally support these standards. 62% of breeders that consider themselves a domestic dog operation support the additional standards, and 67% of operations that board dogs overnight support the additional standards.

While 62% of day care operations and 57% of animal shelters would not have to change how they operate, over a third (35%) of local government pounds, 33% of breeders and overnight boarding would require some change to how they operate (Figure not shown).

Figure 46: Operational change (Section 3)

Do you agree with the proposed minimum standards in Part 3 Section 3, relating to the additional housing requirements of domestic dog operations?

If these standards apply to you, will complying with these standards require you (or members of your organisation) to change how you/they operate?

Figure 47: Support for Part 3 Section 3 by category of domestic dog operation
Key themes

Common themes on additional housing requirements for domestic dog operations raised in the survey comments or written submissions included:

- Expectations for compliance to additional housing requirements by small operations, such as a hobby breeders, is unrealistic.
- The definition of fire-fighting equipment should specify whether a hose would meet this requirement.
- Temperatures outside that range of 15-30 degrees (Guideline 18.3) are not uncommon for Australian conditions, and the practicality of maintaining the temperature of housing in this range is questionable.
- High and low temperatures will affect a dog’s comfort and wellbeing, and requirements to maintain appropriate temperatures for dogs kept in a domestic dog operation should be a standard.
- Proposed ammonia concentration levels (25ppm) are likely to be harmful or distressful to dogs, and should be reduced.
- Unless a dog urinates, defecates or is unwell (which would warrant cleaning) the draft standard requiring cleaning between consignments of dogs is unrealistic or impractical for the transport of dogs by local government rangers and commercial transporters.
- Large rebuild costs associated with complying with these requirements would impact on the sustainability of domestic dog operations; specific costings were not provided.

What you said

“Seems like common sense measures.”

“The temperature of housing in an establishment should be maintained between 15 and 30 degrees... its Australia we have many days over 30. This isn't a problem for young healthy dogs.”

“I agree, but unless there is supervision by an outside body, the rules and regulations are not followed. I have witnessed this in Day Care facility where the temperature was much higher than 30 degrees and smelly faeces was lying around. In addition strong ammonia was used to clean whilst the puppies were still present and it was not done during a change-over. That is why I firmly believe that unless there are inspectors to follow up on the proposed rules; some dog operations will not adhere to them, in order to save on staff cost and training.”

“Once again, we would probably close as we operate as volunteers and charge a small $10 fee to cover equipment, insurance and tea and coffee.”

“Again, these standards will allow us to better care for the dogs in our shelter, and will force people to do their job properly.”

“I'll have to clean kennels daily instead of when they actually require cleaning. Will mean greater use of water and power. Which in turn will lead to greater disturbance to the neighbours (my dogs think the pressure cleaner is a play toy and bark excessively during cleaning).”
Additional health and husbandry requirements

The draft Dog Standards and Guidelines propose additional health and husbandry requirements for domestic dog operations, including; dog husbandry, food and water, exercise, whelping and care of puppies. The survey sought the community’s view on these proposed minimum standards, and the expected impact of compliance, including cost estimations.

Do you agree with the proposed minimum standards in Part 3 Section 4, relating to the additional health and husbandry requirements for domestic dog operations?

If these standards apply to you, will complying with these standards require you (or members of your organisation) to change how you/they operate?

Figure 48: Support for Part 3 Section 4

As shown in Figure 48, overall, 76% of respondents generally supported the proposed additional standards relating to health and husbandry for domestic dog operations. When separated into stakeholder groups (see Figure 50), the highest support came from local government pounds at 96%, followed by day care operation at 92%. 67% of operations that board and 79% of dog trainers support the additional standards.

Most domestic dog operations said they would not have to change how they operate. The largest impact was reported by local government pounds, with 26% of these establishment indicating they would need to change how they operate (Figure not provided).

Figure 49: Operational change (Section 4)

Figure 50: Support for Part 3 Section 4 by category of domestic dog operation
Key themes

Common themes on additional health and husbandry requirements for domestic dog operations raised in the survey comments or written submissions included:

- Minimum qualifications should be established to ensure competency of carers for dogs.
- Kennels are naturally loud environments due to barking dogs. Requirements for husbandry practices which minimise excessive noise exposure are not realistic.
- Puppy socialisation is important, and more information should be provided. Puppy socialisation should be a standard for all dogs, not just those captured in a ‘domestic dog operation’.
- Complying with the requirement to exercise dogs continuously housed in an enclosure (Standard 23.1) may pose occupational health and safety issues to carers in the event of an aggressive dog.

What you said

“Again, it is all about the welfare of the dogs. Any business should be meeting these.”

“While we run a low stress kennel that is mostly quiet there are times, due to the fact that we are in an area specifically zoned for kennels, that we will not be able to control excessive noise. Peak periods, such as school holidays does see a natural increase in barking in our area, especially in the first few days and also at feeding and exercise times. Dogs are naturally excited. We also get dogs that do not display their anxiety until their owners leave. While we may ask that those dogs do not come back it is not always practical or possible to assess. Similarly when I have visited shelters the noise is always a factor, much more so than our small boarding and breeding kennel. I can see this impacting on most given the right circumstances.”

“Noise in a boarding kennel is normal as dogs bark when they communicate.”

“Too vague. Formal qualifications of some sort must be required.”

“…would have to turn dogs away. A dog was offered to me to rehome via a Perth based agency, and it came from community about to birth, so couldn’t go on a plane. It had pups in my laundry, she was protective and difficult to manage, but I/she coped and she and her pups weeks later were transported and pups adopted (unsure as of today if mum got adopted) - this proposal would mean I couldn’t commit to this kind of thing, in and around my paid work, due to the compliance issues and ‘threat’ of enforcement.”

“The requirement to exercise dogs under S23.1 is not supported as this raises OSH issues particularly when dealing with dogs whose temperament is unknown, this would also mean that the current Animal Management Facility would need an exercise enclosure constructed. There needs to be a clearer explanation on the meaning of ‘continuously housed’ as I don’t believe minimum length that a dog needs to be held under the Dog Act 1976 would constitute them needing to be exercised daily.”
Other commentary / insights

Many of the key themes and comments identified in previous sections of the survey were reiterated in the final comments on the draft Dog Standards and Guidelines.

Puppy farming and poor conditions for breeding dogs and puppies remains a key area of concern. As outlined previously, standards for breeding dogs, included within the larger draft Dog Standards and Guidelines document, are one of four measures proposed under the WA Government’s Stop Puppy Farming initiative.

“While some critics of the draft Standards and Guidelines have attempted to portray them as not addressing genuine concerns, this runs contrary to RSPCA WA’s daily experiences of the realities of poor dog welfare in WA. The Standards cover a variety of welfare concerns RSPCA WA encounters on a regular basis including dogs suffering as the result of failure to provide basic health care, inadequate shelter, behavioural deprivation, unsafe transport, painful forms of restraint and the devastating consequences of irresponsible and indiscriminate dog breeding.” (RSPCA WA, 2019)

The need for adequate enforcement or monitoring against the standards was a recurrent theme throughout the response to the consultation. Respondents queried the availability of resources for enforcement; who would undertake this work, whether inspections would be conducted, and whether the standards would be used as a tool for investigating cruelty.

Some respondents felt that the generalised nature of many standards may make these subject to interpretation, and noted the importance of ensuring that standards are written in a clear and specific way, to enable enforcement. Conversely, the prescriptive nature of standards was criticised. Further clarity on a number of specific terms used through the document was sought. This included terms such as aversive device, bedding, dog breeder, ear cropping, excessive, exercise, psychological needs, tail docking and veterinary behaviourist. Review of the definition of ‘experienced dog trainer’ was noted as an important factor in regulating training and restraint devices. A small number of respondents noted that the words ‘must’ and ‘should’ have very similar meanings in the Oxford dictionary and suggested the use of these terms be reviewed to ensure the public understand that compliance with the guidelines is not mandatory.

Whilst a reference list has been provided on the Department’s website, some responses noted that full referencing of the draft document would assist the community to assess the proposals and make an informed response, and be useful for educational purposes.

Over and above the development of minimum requirements for dog welfare, the need for education about the care of dogs, and about responsible dog ownership was emphasised.

“I believe education is the key. Most pet owners are not aware of proper pet nutrition, training and needs. As a trainer, I can easily tell a barking dog is bored or needs a job, but the average owner will not know that or what to do. Approaching local organisations such as Dog Clubs and ANKC to do education sessions aimed at your average dog owner would do wonders.”

Final comments to the consultation reflected the wide variety of roles that dogs have in our society. Responses referred to pets and companion dogs, show and breeding dogs, assistance dogs, farm and guardian working dogs, police dogs, greyhounds and rescue dogs. This, and the range of ways in which dogs are kept has challenged the drafting of animal welfare standards intended to apply to dogs in WA. However, the importance of standards to promote the welfare of dogs was emphasised in final commentary on the draft document.

“It’s obviously an incredibly difficult task we’ve set ourselves, to regulate on the care of Man’s Best Friend. I really think it’s essential to have a trial period when things can be adjusted as learning experience is gained. Good luck.”
Conclusion and next steps

The Department of Primary Industries and Regional Development appreciates the time taken by the WA community to comment on the draft Dog Standards and Guidelines. Thank you all for your input into the consultation process; your submissions have contributed to our understanding of this important issue.

The consultation generated interest from a broad range of stakeholders; this report provides a summary of the survey data and a snapshot of written feedback to the consultation. It is clear that the community holds a wide range of perspectives and beliefs about the manner in which dogs should be kept and cared for. Much of the feedback to the consultation has reflected this diversity of views, with some issues, and related draft policy, generating polarised commentary from respondents. Nevertheless, the desire to improve the welfare of dogs in WA is a shared goal, and there is a high level of support for the introduction of minimum standards for people who own or keep dogs, for those who breed dogs, and those who care for dogs in a domestic dog operation.

In keeping with good practice in relation to laws and policy-making, the Department will consider all submissions and the key issues raised in response to the consultation. This will inform the development of final Standards and Guidelines for the Health and Welfare of Dogs in Western Australia, and any regulatory proposals that may follow.

The Department will continue to provide updates as the project progresses. To stay informed about this process, please visit the Department’s website at: https://www.agric.wa.gov.au/animalwelfare/standards-and-guidelines-health-and-welfare-dogs-wa.
Appendix 1: Survey respondents by postcode

Legend
- 1 to 10 survey respondents
- 10 to 20 survey respondents
- 20 to 30 survey respondents
- > 30 survey respondents
- Postcode region
Appendix 2: Written submission list

Written submissions were received from the following parties. Where approval has been given, these will be published on the Department’s webpage.

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Appendix 3: Survey questions

1. Please check any of the following boxes that apply to you: Companion dog owner / working dog owner / sporting dog owner / dog breeder / dog trainer / pet shop owner or employee / other pet business owner or employee / local government employee / local government elected member / rescue organisation employee or volunteer (including foster carer for dogs) / veterinarian / veterinary nurse / I do not own or care for a dog / other (please specify)

2. Please provide your postcode. If you do not wish to provide your postcode, please indicate which town or region of WA you live in.

3. Should people who own or keep dogs have to comply with minimum standards for the health and welfare of dogs? Please provide the main reason/s for your answer.

4. Should people who breed dogs have to comply with minimum standards for the health and welfare of dogs? Please provide the main reason/s for your answer.

5. Should people who care for dogs in a domestic dog operation have to comply with additional minimum standards for the health and welfare of dogs? Please provide the main reason/s for your answer.

6. Do you think that the proposed standards and guidelines in the document reflect community values and expectations for the acceptable treatment of dogs? Please provide the main reason/s for your answer.

7. Do you think that complying with the proposed minimum standards in Part 2 (General Care of Dogs) will increase the cost of owning a dog? Please provide the main reason/s for your answer, including any estimated cost of compliance.

8. Do you support the proposed minimum standards in Section 1, relating to the identification of dogs and transfer of ownership of dogs? Please identify any issues you have with the proposed standards, including evidence of likely costs, benefits or other impacts.

9. Do you think the key issues about the identification of and transfer of ownership of dogs have been adequately addressed in Part 2, Section 1? If no, please specify, including suggestions for alternative options.

10. Do you support the proposed minimum standards in Part 2, Section 2, relating to housing and transport of dogs? Please identify any issues you have with the proposed standards, including evidence of likely costs, benefits or other impacts.

11. Do you think the key issues about housing and transport of dogs have been adequately addressed in Part 2, Section 2? If no, please specify, including suggestions for alternative options.

12. Do you support the proposed minimum enclosure sizes for dogs, set out in Appendix 1? Please identify the main reason/s for your answer, including suggestions for alternative options and evidence of likely costs, benefits or other impacts.

13. If minimum enclosure sizes for dogs are to be enforceable, what arrangement should be made for making these a requirement by law? To only apply to enclosures built after the law is passed/To be phased in over 5 years/To be phased in over 10 years/I do not agree that minimum enclosure sizes should be enforceable/Unsure/Other (please specify)

14. Do you support the proposed minimum standards in Part 2, Section 3, relating to the health and husbandry of dogs? Please identify any issues you have with the proposed standards, including evidence of likely costs, benefits or other impacts.
15. Do you think the key issues about health and husbandry of dogs have been adequately addressed in Part 2, Section 3? If no, please specify, including suggestions for alternative options.

16. A prong collar is a chain made of metal or hardened plastic links with prongs for positioning against the neck on each link (also called pinch collars). Do you agree with the proposal to ban the use of prong collars? Please provide a reason/s for your answer.

17. Do you think is acceptable to use an electric shock collar on a dog to:
   (a) train a dog (remote training) (Yes/In some circumstances/No/Unsure)
   (b) contain a dog (invisible fence) (Yes/In some circumstances/No/Unsure)
   (c) inhibit barking (anti-barking collar) (Yes/In some circumstances/No/Unsure)

*Please provide the main reason/s for your answer.*

18. Do you think is acceptable to use a vibration, spray or sound collar (e.g. citronella) but not an electric shock collar on a dog to:
   (a) train a dog (remote training) (Yes/In some circumstances/No/Unsure)
   (b) contain a dog (invisible fence) (Yes/In some circumstances/No/Unsure)
   (c) inhibit barking (anti-barking collar) (Yes/In some circumstances/No/Unsure)

*Please provide the main reason/s for your answer.*

19. Do you think the proposed standards outlining the use of electronic collars on dogs are adequate to safeguard dog welfare? *Please provide the main reason/s for your answer, including suggestions for alternative options.*

20. If electronic collars are restricted or banned, will complying with this regulation require you or your organisation to change how you operate? *If so, please provide details of the changes required and, if possible, estimate likely cost of making the changes (including one off and ongoing costs).*

21. Do you support the proposed minimum standards in Part 2, Section 4, relating to the breeding of dogs? *Please identify any issues you have with the proposed standards, including evidence of likely costs, benefits or other impacts.*

22. Do you think the key issues about breeding of dogs have been adequately addressed in Part 2, Section 4? *If no, please specify, including suggestions for alternative options.*

23. Do you think the number of litters that a bitch can produce should be restricted by law? Please provide the main reason/s for your answer.

24. If you agree that the number of litters that a bitch can produce should be restricted by law, how many litters do you think it is reasonable for a bitch to produce in her lifetime?

25. Do you agree with the definition of a ‘domestic dog operation’, as outlined above? *Please identify any issues you have, including suggestions for alternative options and evidence of likely costs, benefits or other impacts.*

26. Considering the definition of domestic dog operation above, is it likely that the proposed minimum standards will apply to you (or members of the organisation that you belong to)?

27. Please check any of the below categories that apply to your domestic dog operation. *Does not apply/Breeder/Animal Shelter/Local Government pound/Pet shop/Day care for dogs/ Overnight boarding/Training/Other*

28. Do you think that these standards are likely to have a disproportionate impact on small business compared to medium and large business? *Please provide a reason for your answer, including evidence of likely costs, benefits or other impacts.*
29. Do you agree with the proposed minimum standards in Part 3 Section 2, relating to the administrative requirements of domestic dog operations? Please identify any issues you have with the proposed standards, including evidence of likely costs, benefits or other impacts.

30. If these standards apply to you, will complying with these standards require you (or members of your organisation) to change how you/they operate? If so, please provide details of which standards will require those changes, describing the changes required and, if possible, estimate likely cost of making the changes (including one off and ongoing costs).

31. Do you agree with the proposed minimum standards in Part 3 Section 3, relating to the additional housing requirements of domestic dog operations? Please identify any issues you have with the proposed standards, including evidence of likely costs, benefits or other impacts.

32. If these standards apply to you, will complying with these standards require you (or members of your organisation) to change how you/they operate? If so, please provide details of which standards will require those changes, describing the changes required and, if possible, estimate likely cost of making the changes (including one off and ongoing costs).

33. Do you agree with the proposed minimum standards in Part 3 Section 4, relating to the additional health and husbandry requirements for domestic dog operations? Please identify any issues you have with the proposed standards, including evidence of likely costs, benefits or other impacts.

34. If these standards apply to you, will complying with these standards require you (or members of your organisation) to change how you/they operate? If so, please provide details of which standards will require those changes, describing the changes required and, if possible, estimate likely cost of making the changes (including one off and ongoing costs).

35. Do you have any other comments, questions or concerns about the Dog Standards and Guidelines, including evidence or alternative options?

36. Would you like to receive updates on the Dog Standards and Guidelines?

37. If yes, please provide your email address to receive updates on the Dog Standards and Guidelines.

Important disclaimer

The Chief Executive Officer of the Department of Primary Industries and Regional Development and the State of Western Australia accept no liability whatsoever by reason of negligence or otherwise arising from the use or release of this information or any part of it.

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