

## **PROPOSED SUBMISSION**

Representatives from the SA Working Sheepdog Association, the SA Yard Dog Association and Livestock SA have been working with the relevant authorities in relation to the proposed *Code of Practice for the Wellbeing of Dogs and Cats in Breeding Facilities* and the proposed changes to the *Dog and Cat Management Act 1995* since November 2014.

Before the point of public consultation, we've had some significant changes made and some wording altered. However we feel there are still a few finer points that need to be altered through the public consultation process for the good of all livestock working dogs and owners, whether it be for association breeders or just average farm sheepdogs. Within the Breeders Code, Guidelines will be just that, but **STANDARDS WILL BE LAW**.

Apathy will be our biggest enemy. The changes to the Dog and Cat Management Act will **affect ALL DOGS** and the Breeders Code will **affect ALL DOGS THAT ARE NOT DESEXED**.

In light of the attention the poultry and pig industries are copping from the animal activists, it's important to make this code achievable now while we have the chance. It is highly likely that this negative attention could turn to livestock working dogs, by people who do not always have an accurate understanding of the needs of rural animals and their instincts.

Following are the recommendations made by the SA Working Sheepdog Association, in conjunction with the SA Yard Dog Association and Livestock SA representatives. We strongly urge everyone involved with livestock working dogs to make a submission on the Your Say website (details below) using the points below to present a united front. You can find the complete Consultation Draft at the same website, to use the section reference numbers below for comparisons.

### **THE CODE OF PRACTICE FOR THE WELFARE OF DOG AND CATS IN BREEDING FACILITIES**

All people who breed dogs or cats should be required to comply with the Code of Practice.

Reasons

- They are breeders whether they offer litters for sale or to give them away.
- Giving puppies or kittens away does not ensure that they will be cared for and or homed in a responsible way.
- Pups and kittens that have been given away are the ones most likely to be dumped as there has been little or no financial commitment, so less accountability.
- If give aways are exempt, dogs and cats will be traded in cash with no paper trail and no tax revenue for the government. Only the honest breeders will comply, rather than the ones who need to improve their practices.

#### **5.1 ACCOMMODATION**

We suggest adding –

*Minimum height of cages with a roof cover is a height that allows the dog to stand comfortably with free space above them in compliance with 5.1.1.3.*

Reasons

- Livestock working dogs are usually housed outside.

- Dogs on ground level who are housed outside are more prone to flea infestations and snake bite, and without roofing are at a greater risk of sun exposure-related issues.
- A roof prevents dogs from climbing out, therefore avoiding accidental injury or death from hanging and/or catching legs etc on open mesh fence tops
- These heights would allow the dog to have freedom of movement
- Cages that are commercially produced and are lower in height than the recommended minimum height have proven over several years to be suitable to provide for the good health and wellbeing of the animals.

## 6.3 CLEANING AND DISINFECTION

### 6.3.1.3

Should be a guideline, not a standard.

Reasons

- Regular disinfection is unnecessary for livestock working dogs.
- Unnecessary exposure to chemicals and potential breakdown of natural immunity.

## 7.2 VETERINARY CARE

### 7.2.1.5

Should be a guideline, not a standard.

Reason

- It is not mandatory to immunise children. While we recognise the importance of vaccinations we believe each individual owner has the right to choose based on their own potential risk factors.
- Some livestock working dogs do not leave their own properties and do not come into contact with these diseases.

## 8.1 TRANSFER OF OWNERSHIP

### 8.1.1.1

We suggest wording be changed to -

*Puppies and kittens must not be sold until they are fully independent of their mother and not sold to a retailer until they are 8 weeks of age.*

Reasons

- Often livestock working dog bitches will wean their pups as soon as the pups are onto solids, often at around 5 weeks of age.
- For a working relationship to begin the sooner the pup imprints and bonds to its owner/trainer the stronger that bond will be.

## 9. BREEDING AND REARING

### 9.1.1.6

We suggest wording be changed to –

*Whelping bitches must be provided with a suitable whelping area that must be kept clean.*

## Reason

- Instinctively bitches may need to prepare their own nest and should be allowed to do so, providing as clean and safe an environment as possible.
- Most livestock working dogs quickly destroy any kind of soft bedding provided to them.

## **PROPOSED CHANGES TO THE *DOG AND CAT MANAGEMENT ACT 1995***

### MICROCHIPPING

- Not a popular plan unless a more cost effective method of application is available. For example, accredited members trained to insert microchips within recognised breeding associations. It is a wasted resource for a veterinary practitioner to be inundated with microchipping when others can do it.
- To be phased in with only dogs born after the adoption of the Act mandatory for microchipping.

### DOG AND CAT BREEDERS

- Livestock working dog breeders should register at no cost, as working dogs are an integral part of the livestock industry, and are not merely companion animals.
- If there is going to be a cost to being registered as a breeder it has to be indexed. For example, occasional breeders register at no cost, but larger breeding facilities pay a proportionate fee for income earned from sale of pups.

### REGISTRATION

#### Section 26(7)

All councils should recognise active livestock working dogs with a reduced fee.

## Reason

Livestock working dogs are a tool of trade in livestock producing businesses and have been recognised in the past by rural councils for their importance to the Livestock industry.

A livestock working dog as described in the "Code of Welfare for Australian Livestock Working Dogs" (approved by the Australian Farmer Organisations, Working Kelpie Council, Australian Sheepdog Workers Association & the Royal Agricultural Societies in 2012) is:

A dog usually kept or proposed to be kept and/or worked:

- On rural land and/or
- By an owner/breeder or lessee who is a Primary Producer, or a person engaged or employed by a Primary Producer, and  
Primarily for the purpose of
- Herding, droving, protecting, tending or working stock or
- Being trained in herding, droving, protecting, tending or working stock.

The Alexandrina Council also has a reputable list of qualifying requirements to ascertain eligibility. It can be found on the council's website by searching *Alexandrina Council working dogs*.

**For more information, or to make your submission go to:**

<http://yoursay.sa.gov.au/>

Submissions on the draft Code of Practice for the Welfare of Dogs and Cats in Breeding Facilities

**close on Friday May 29, 2015.**

Submissions on the proposed legislative changes to the Dog and Cat Management Act

**close on Friday June 26, 2015.**

Everyone involved in the livestock industry is urged to make a submission. Do not just say yes or no – to strengthen your argument, state your reasons for your response and give reasonable, viable alternatives such as those listed above. You may copy and paste from our recommendations, or draft your own if you prefer.

You can mail your comments or complete an on-line survey. This survey has plenty of spaces for further comments.

All details can be found on the Your Say website.

South Australian Working Sheepdog Association, South Australian Yard Dog Association, Livestock SA.