

Topic 1 - Sterilisation of Dogs

1.1 Identifying a dog as sterilised and registration tags

GUIDING QUESTIONS	
1. Should regulation 20(3)(b) of the Dog Regulations (application of a tattoo) be deleted? If so, is there a visual way (other than application of a tattoo) to identify a dog as sterilised?	<p>Tattoos are generally a reliable way to confirm sterilisation when they are used. However, as they are not a mandated requirement and so not always applied by veterinarians when sterilisation is performed, their absence does not confirm the animal is entire. There is no other visual way to identify a dog as sterilised. Removing this only visible way of confirming sterilisation would not appear to have any benefit.</p>
2. Would a requirement for a tattoo affect show dogs?	<p>This could be accommodated by the standards for showing of dogs being adapted such to allow ear tattoos if they became a mandated requirement.</p>
3. How are dogs in public places currently checked for sterilisation status/registration compliance?	<p>N/A</p>
4. Would the proposal assist with monitoring and enforcing the sterilisation of dogs?	<p>A CRS containing confirmation of sterilisation would assist with monitoring by the bodies who can access this data. Tags with visual symbol/colour would also assist monitoring. Compliance would only be positively impacted if monitoring is rigorously undertaken by the relevant enforcement agencies.</p>
5. If yes, how should a registration tag indicate that a dog is sterilised/is not sterilised? e.g., should a symbol, letters or abbreviation of some kind be inscribed on the registration tag?	<p>Placing indicators on a tag as a way to identify a dog as being sterilised may not be effective as it is not able to be reliably associated with an individual dog (ie can be easily lost, not used, worn by another dog). The costs required to undertake adding this to a council registration tag could be considered not justifiable.</p>

1.2 Classes of dogs exempt from sterilisation

GUIDING QUESTIONS	
6. Is it advisable to exempt dogs in areas that lack access to vet services, or will this exacerbate the problem in those areas? What alternative solutions are there (e.g. funding for registration, microchip and sterilisation procedures, and guidelines for community based management of dogs)?	<p>No exemptions should be made based on challenges with accessing veterinary services. The access to veterinary services should be provided support (eg financial, social,) and furthermore, the processes to facilitate access to vet services undertaken in a contextualised manner eg situations of "community owned" dogs. The utilization of mobile veterinary services should be included.</p>
7. Are there any other exemptions that should be considered?	<p>No – see answer to Q6</p>

Topic 2 - Pet Shops

2.1 Businesses not considered to be relevant pet shop businesses

GUIDING QUESTIONS

1. Are there other classes of business that should not be a relevant pet shop business?

Examples to consider:

- Vets that rehome puppies/dogs from their business
- Individuals that occasionally sell from their home
- Refuge operations that are operating adoption services within the premises of a business.

The AVA supports that registered veterinary practices should be exempt.

We would not support individuals that occasionally sell from their home as an exemption as this would be a potential "loophole" and would require a very clear definition of "occasionally sell" if used.

We support "Refuge operations that are operating adoption services within the premises of a business" with clear definition of "refuge operations" and "adoption services".

2.2 Application for grant of pet shop approval

GUIDING QUESTIONS

2. What information should be prescribed for body corporates applying for registration?

The same information as for other applicants.

3. Is any type of approval required for pet shops not selling dogs/puppies?

Regulation and oversight should be required if other species of animals are sold through pet shops. This is required as sentience is recognised in other species and animal welfare responsibilities apply to all sentient animals.

4. Should approved pet shops be subject to the requirement to register their dogs with a concessional rate applying?

The AVA are supportive of all dogs being included in a CRS under any form of ownership. The pet shop will be the dog owner until purchase by their customer is complete - then ownership transfers to them.

5. When a pet shop applies for a licence should the premises be inspected for suitability and on an ad hoc/unannounced basis.

The AVA are supportive for inspections to be undertaken for initial approval and on an ad hoc/unannounced basis. The AVA strongly recommends that the AVA policy: Companion animals in pet shops (<https://www.ava.com.au/policy-advocacy/policies/companion-animals-commercial-activities/companion-animals-in-pet-shops/>) and the AVA guidelines for Companion animal management and welfare (<https://www.ava.com.au/policy-advocacy/policies/companion-animals-management-and-welfare/animal-shelters-and-municipal-pounds/>) be utilised as standards for approval and renewal of pet shops.

With regards to whether a particular breed of dog will be procured for sale and what strategies will be in place to obtain particular breeds through shelters, the AVA recommends referring to the RSPCA/AVA "Love is Blind" campaign and the AVA Brachycephalic policy. This should be used for forming pet shop procurement and adoption policy, especially regarding transport of Brachycephalic breeds.

The area of management of pet shop to supply dogs to customers (operational policies, staff numbers and training) including customer vetting process requires careful consideration. It would be very challenging for the appropriate level of training and resources to be available for use by pet shop staff to equitably and responsibly assess and "screen" customers as suitable for adopting an animal. This is a challenge faced by all animal adoption services. Resources need to be made available to engage human allied support services (such as Social Workers) to contribute to putting protocols in place and/or to provide their services. There is a high risk of the unintended consequence of people who could be responsible owner owners being judged on an inappropriate set of criteria, of by staff who are not qualified to make this assessment.

The utilisation of veterinary behaviourists or other suitably qualified veterinary professionals is strongly recommended to provide information, resources and services to assist with dog mental health care. As this is not an aspect of animal welfare that can be adequately performed by non veterinary professionals.

2.3 Renewal of pet shop approval

GUIDING QUESTIONS

6. Are there any other requirements that should be prescribed in relation to an application for renewal of a pet shop approval?

The AVA would recommend a requirement that a record be provided for review of 1) all sales and 2) any issues that arose following a sale eg requirement to provide veterinary services if the animal became unwell after its sale, 3) returns and customer complaints

2.4 Refusing to grant or renew a pet shop approval

GUIDING QUESTIONS

7. Are there any circumstances in addition to those listed above which should be prescribed in which a local government may refuse to grant or renew a pet shop approval?

Non compliance with their approval requirements

2.5 Cancellation of pet shop approval

GUIDING QUESTIONS

8. Are there any circumstances which should be prescribed in which a local government may cancel a pet shop approval?

Non compliance with their approval requirements

9. How would the death of an individual who is responsible for the day-to-day running of the pet shop be dealt with?

The AVA would expect that systems and processes should be in place and are adequate for reliance on an individual to not be required, at least in the short term from an Animal Welfare aspect. Protocols would need to be in place for transfer of responsibility to another individual within a specified timeframe.

2.6 Certificate of pet shop approval

GUIDING QUESTIONS

10. What information should be prescribed for a certificate in relation to an approval of a pet shop and renewal of a pet shop?

N/A

2.7 Record of approval of a pet shop approval

GUIDING QUESTIONS

11. What information should be prescribed for recording in the CRS?

N/A

12. How many days does it take for local governments to be notified of applications for a review of objection by council and review of original decision by SAT?

If actual or potential animal welfare implications are involved then timeframes would need to be very short (eg 1-2 weeks), and interim measures should be applied immediately pending resolution of the matter.

2.8 Objection to decision relating to a pet shop approval

GUIDING QUESTIONS

13. What information should be prescribed in the form for a person to object to a decision of a local government in relation to a pet shop approval?

N/A

2.9 Pet shop to provide certain information

GUIDING QUESTIONS

14. Should the information provided to the person who is supplied or offered a dog be the same?

In regard to the prescribed information for person who is supplied or offered a dog, other relevant medical history including chronic health conditions should also be provided.

15. What balance with privacy should be struck?

The AVA believes that animal welfare must always take precedence over privacy of the customers or

suppliers.

2.10 Pet shop to keep records

GUIDING QUESTIONS

16. What information will pet shop businesses be required to keep in relation to each dog?

The use of the term "health certificate" is requested to be replaced with a "Health Assessment". If medical records are available and have been granted permission by the owner on record for the animal at the veterinary practice who holds the records, then those records should be provided. A veterinarian can examine and assess an animal that is being offered/received by the Pet Shop and provide a "Health assessment" on the status of that animal at the time of examination, and within the limits of any investigation or testing that may or may not have been undertaken at that time, or from review of available records. A veterinarian must have no onus placed on them to provide a "Health Certificate" that implies the animal is free from any form of health-related conditions. Any veterinary service costs incurred to undertake the examination and produce the health assessment, including sourcing and providing historical records (with client permission,) must be adequately compensated by the pet shop or owner responsible for the animal. It should also be noted that a vaccination certificate issued by a veterinarian is not proof of a health assessment being undertaken.

With regards to any temperament and behavioural issues around children and other animals (if known), these must be included in the Veterinary Health Assessment and where deemed appropriate by the attending veterinarian, opinion is sought from a veterinary behaviourist, or suitably qualified veterinary professional, and the costs incurred for these services is paid.

17. What information should pet shop businesses be required to keep in relation to the person who supplied the dog to the business?

N/A

2.11 Pet shop to provide information to local government

GUIDING QUESTIONS

18. Should a manner be prescribed? Could 'prescribed way' include the following:

- a paper based or electronic format that represents the true and fair supply to, and destination of dogs from, the business;
- a system that is accessible to relevant local governments in person or copies provided through the post or in person on request; and
- include a requirement for the pet shop to store the records at a location specified to the local government if the shop goes out of business before 5 years?

The manner should be incorporated within the CRS platform in order for 1) information to be accessible to all authorised parties, 2) can be constantly maintained 3) information to be archived for extended time, which should cover the life span of each dog

19. Should a time be prescribed for the making of a record? If so, how many days (e.g., within x days of the information being made available from the dog supplier)?

This prescribed timeframe should align with that for microchip registration ie 7 days from the change of ownership of the animal.

2.12 Transition period for relevant pet shops

GUIDING QUESTIONS

20. From what date (after commencement) should pet shops be required to acquire their dogs only from accredited dog suppliers?

12 months should be more than adequate time to establish processes and provide training, especially if notice is given in the lead up to commencement of the CRS and any new requirements.

21. Is any type of approval required for pet shops not selling dogs/puppies?

Refer Q3 regarding other animals being sold - sentience and animal welfare

Topic 3 - Dog Supply Approval

3.1 Grant or renewal of dog supply approvals

GUIDING QUESTIONS

1. What circumstances should be prescribed for a CEO to refuse to grant a dog supply approval?
N/A

3.2 Refusing to grant a dog supply approval

GUIDING QUESTIONS

2. Are there any circumstances in addition to those listed above which should be prescribed in which a Department CEO may refuse to grant or renew a dog supply approval?
N/A

3.3 Cancellation of dog supply approval

GUIDING QUESTIONS

3. What further circumstance should be prescribed when considering the cancellation of a dog supply approval?
N/A
4. How would the death of an individual who is responsible for the day-to-day running of the dog supply organisation be dealt with?
N/A

3.4 Review of decisions about dog supply approvals

GUIDING QUESTIONS

5. What review process should be prescribed?
N/A
6. Should this process mirror the review processes for decisions about dog/cat registrations, approvals to breed and pet shop approvals (see topics 2.8 and 4.6)? If not, why not?
N/A

3.5 Information about dog supply approvals to be recorded

GUIDING QUESTIONS

7. What information is to be prescribed regarding a dog supply approval?
N/A

3.6 Certificate of dog supply approval

GUIDING QUESTIONS

8. What information should be prescribed for a certificate of dog supply approval?
N/A
9. Should a dog supplier's affiliation with a pet shop be recorded on the certificate of approval?
N/A

3.7 Dog supplier to provide information to approved pet shop

GUIDING QUESTIONS

10. What information should be included in a health assessment (health certificate) of a dog?

As outlined in 2.10 Q 16 above, veterinarians can only provide a health assessment stating the abnormalities and their professional opinion of the health of an animal at the time of examination and within the limits of the assessment that has been requested and/or the clinical history that is made available to them ie clinical exam vs diagnostic work up (laboratory tests, imaging, specialist opinion). The AVA request that more information is provided as to the process as to how a determination is made if the assessment of an animal is considered acceptable for the animal to be transferred/accepted for adoption by a pet shop. Parameters would need to be set for how and who makes the decision to accept the animal for adoption - akin to determining insurance claims and transport risk of animals. Veterinarians would need to be involved in this step of the process, however this does not form part of the health assessment provided by a veterinarian at the request of the person offering or receiving the animal for adoption. The use of the term "Health Certificate" is requested to be replaced with "Health Assessment" as outlined previously. We would also seek clarification as to who is responsible for paying the cost of a health assessment – the person accepting or providing the animal for adoption. With regards to the details of the health assessment, noting any limitations of the assessment including: clinical signs of infectious and/or contagious diseases, assessment of weight, the existence of parasites, the existence of any wounds, swellings, lumps or discharges from eyes, nose mouth or ears. This should be included in the clinical assessment of any noted abnormalities at the time of examination - including limitations of the assessment that was carried out. Stipulating the "clinical signs of infectious and/or contagious diseases" would limit greatly the scope of conditions that could significantly impact the health and wellbeing of the animal, and the potential medical costs that the animal may require at that time or in the future eg dental disease, skin conditions, conformational defects, cardiac, aural, oral or ophthalmic abnormalities, etc. The registration number for a veterinarian providing a health assessment should be defined as a veterinarian registered in Australia including in what jurisdiction they are registered, as dogs may be obtained from interstate or overseas. A reference has been made to information regarding complaints related to not providing a health assessment, which could be collected in the CRS. Can further information be provided around in what circumstances would this type of complaint be made ie who is not providing the health assessment. We are of the understanding that a pet shop would be prohibited from accepting or placing an animal for adoption without an approved health assessment being provided. With regards to prescribed information of a dog's "temperament and behavioural issues, if known around children and other animals, including who has made the assessment"; where issues are flagged by the veterinarian carrying out the health assessment, any additional opinion relating to temperament and behaviour must be undertaken by a prescribed class of approved professionals ie veterinary behaviour specialists or appropriately qualified or experienced veterinarian. Dog "trainers" or any other unregistered/unregulated person would not be acceptable to provide opinions that could have significant health and wellbeing implications for the animal and the potential adoptive owners.

3.8 Holder of dog supply approval to keep records

GUIDING QUESTIONS

- 11. What information should dog suppliers be required to keep in relation to each dog?**
The same information that has been previously outlined
- 12. What information should dog suppliers be required to keep in relation to the person who supplied the dog to the business, and the dog's history?**
Clarification required about terminology of "supplier" in this context is requested.
- 13. Should a manner be prescribed for the keeping of a record (note requirements of s38W)?**
Yes
- 14. How to treat a dog that is transferred from general rescue operations (would/should this be facilitated)?**
This question requires clarification please.
- 15. Should a time be prescribed for the making of a record?**
Yes, recommended to be in line with microchipping record timeframes

Topic 4 - Approval to Breed

4.1 Approval to breed applications

GUIDING QUESTIONS

1. What information should be prescribed (as opposed to approved information) in an application for approval to breed?

With regards to : Breed of dogs to be bred:•number of breeding dogs to be kept at the property •name, sex, breed, colour, birth date or age, microchip identification number (or certificate of exemption); The total number of dogs on the property, not only "breeding dogs" should be declared ie the total number of dogs older than 12 weeks of age. Full details of each individual animal should be provided. A clearer definition of "kept at the property" is also required eg housed/kennelled for more than 24hrs.

2. What other requirements should be prescribed?

The AVA recommends the following AVA policy should be considered in drafting prescribed and approved information: <https://www.ava.com.au/policy-advocacy/policies/companion-animals-commercial-activities/puppy-farming/>. This policy includes : Dog Breeder Standards; Enforceable Dog Breeder Standards are an important tool to support investigations and prosecutions of suspected puppy farming activities or to form the basis of regular compliance inspections linked to breeder identification renewals. These Standards should be adopted into legislation as compulsory codes under the respective state animal welfare legislation. Dog Breeder Standards should include chapters covering at least the following topics: responsibilities of owners; animal health and veterinary care; housing and environment, hygiene and management; breeding and rearing; socialisation and environmental enrichment; management of inherited disorders (that include behavioural, skin, musculoskeletal, cardiac); transfer of ownership and requirements for identification. Specific Standards should include: minimum age of breeding, maximum number of litters in a lifetime of a breeding bitch, maximum age of breeding; appropriate preventative health regimens including veterinary examinations; management of breeding activities including mating and whelping; rearing, weaning, socialization and practices that promote behavioural health and wellbeing; housing and space requirements; and requirements for record keeping.

Additional criteria points for consideration could include; • The applicants capacity/resources to fund veterinary services • The applicant has undertaken education/training required to breed responsibly eg• Pre-breeding screening of heritable defects eg hip/elbow scoring, Brachycephalic program* (a person who is not a registered breeder could still be breeding in a manner that negatively impacts on these traits)• The applicant demonstrates an understanding of normal mating, pregnancy and whelping – in order for them to be able to identify when veterinary advice/services are required • Demonstrated an understanding of normal neonatal puppy health, rearing/weaning of pups, health care (vaccination regime, parasite control, nutrition), behaviour management of pups in preparation and during going to new homes • The applicant must be a client of a registered veterinary service so that information, support and services are available during regular hours • The applicant must nominate an After Hours veterinary service that will be used if their nominated veterinary practice does not provide 24/7 services. * For brachycephalic breeds, this must include the requirement that information on BOAS be provided to a potential owner and this information advises that surgical procedures to address BOAS may be required to improve the quality of life of the dog.

3. Are there any matters that should be included to assist in determining fitness and propriety? E.g., should convictions for fraud be declared?

Yes – these should be declared

4. Are there any impediments to the local planning scheme in relation to granting an approval to breed? (e.g., getting approval under the Dog Act and dealing with amenities and impacts in relation to breeding).

The AVA recommends that the following AVA policy be reviewed in relation to this matter: <https://www.ava.com.au/policy-advocacy/policies/companion-animals-commercial-activities/puppy-farming/>. The policy section of note includes: Inspections and enforcement; Issues of compliance, inspection and enforcement of the Dog Breeder Standards and breeder identification system need to be resolved at a government departmental level and include registering authorities such as local councils as well as animal welfare inspectorates such as the RSPCA.

5. What type of conditions would local governments place on approvals to breed dogs (e.g., should those conditions be similar to those placed on approvals to breed cats)?

N/A

6. When a breeder applies for a licence should the premises be inspected for suitability and on an ad hoc/unannounced basis?
The AVA supports both of these actions.

4.2 Classes of dogs not subject to approval to breed requirement

GUIDING QUESTIONS

7. Should breeders of Crown dogs such as police dogs be prescribed as being not required to hold an approval to breed?
The AVA would like to understand the reason for not requiring breeders of Crown dogs to hold an approval to breed. The AVA is of the opinion that all breeders should be held to the same standards and requirements, regardless of where the dogs that are bred are intended to be homed.
8. How are Crown dogs such as police dogs sourced? Are there specific breeders who supply dogs solely to the Crown (e.g., to the WA Police Force)?
This information would need to be confirmed by the relevant Crown departments in order for Q7 to be considered further.
9. Do you support a defence based on a wandering dog impregnating a lawfully unsterilised female dog? What sort of evidence might be required?
This defence would be reasonable, however would be very difficult to prove and creates a potentially significant loophole.
10. Are there other exemptions necessary from the approval to breed system, noting this is a potential loophole?
N/A

4.3 Decisions regarding approvals to breed

GUIDING QUESTIONS

11. How do local governments currently check for compliance with Animal Welfare Act?
N/A
12. Are there any further circumstances that should be prescribed?
Any breaches of requirements/conditions for being an approved breeder that occur should result in immediate cancellation of approval for a defined period eg 12months. Reinstatement of approval should only be considered after that time period and renewal is conditional on the breeder providing evidence of compliance for a prescribed criteria for prescribed length of time eg 12mths.
13. Is the following example an appropriate way to deal with the death of a breeder:
(a) executor notifies death, breeders approval continues (in name of the estate of the deceased), approval to breed is cancelled when puppies are sold/transferred;
(b) the executor has an exemption from sterilisation until puppies sold/transferred.
The estate of a breeder should not assume the responsibilities of the individual approved breeder in a permanent or ongoing manner. A time period should be allocated (eg 6 months) for an individual to apply as the new approved breeder. If this is not done, then the breeding dogs are a) no longer bred and must be desexed b) transferred ownership to another approved breeder.

4.4 Information regarding dog breeders to be recorded

GUIDING QUESTIONS

14. How do local governments become aware of an application for a review of a decision with the SAT?
N/A
15. How do local governments currently record decisions on approval to breed cats?
N/A

16. Would local governments find the development of guidelines useful to deal with objections regarding approval to breed?

The AVA strongly recommends that the Dog Breeder Standards from the following AVA Policy be adopted as guidelines to be used in managing objections regarding approval to breed.

<https://www.ava.com.au/policy-advocacy/policies/companion-animals-commercial-activities/puppy-farming/>

Dog Breeder Standards; Enforceable Dog Breeder Standards are an important tool to support investigations and prosecutions of suspected puppy farming activities or to form the basis of regular compliance inspections linked to breeder identification renewals.

These Standards should be adopted into legislation as compulsory codes under the respective state animal welfare legislation.

Dog Breeder Standards should include chapters covering at least the following topics: responsibilities of owners; animal health and veterinary care; housing and environment, hygiene and management; breeding and rearing; socialisation and environmental enrichment; management of inherited disorders; transfer of ownership and requirements for identification.

Specific Standards should include: minimum age of breeding, maximum number of litters in a lifetime of a breeding bitch, maximum age of breeding; appropriate preventative health regimens including veterinary examinations; management of breeding activities including mating and whelping; rearing, weaning, socialization and practices that promote behavioural health and wellbeing; housing and space requirements; and requirements for record keeping.

4.5 Certificate of approval to breed

GUIDING QUESTIONS

17. What prescribed information should be included in the certificate for an approval to breed?

Date approval is valid to, Full details of the individual breeder and location of breeding facility, Conditions of approval

4.6 Objecting to a decision regarding an approval to breed

GUIDING QUESTIONS

18. What information should be prescribed in the form for a breeder to object to a decision of their local government in relation to an approval to breed?

The applicant must provide information to address all the specific criteria for which the application was rejected.

Topic 5 - Microchipping

5.1 Microchip implanter to give information to database company

GUIDING QUESTIONS

1. What other information should be prescribed?

N/A

2. Do microchip database companies currently share any microchipping information with local governments? If not, is there any ability for microchip database companies do so?

The AVA recommends that the following AVA Policy be reviewed in regards to microchip identification; <https://www.ava.com.au/policy-advocacy/policies/identification-of-animals/electronic-identification-of-animals/>

The AVA is of the opinion that communication or access between the National microchip registers and the WA CRS would improve ability to track/trace animals and uphold compliance for owner registration, breeder registration and pet shop approval.

5.2 Upskilling of rangers and local government staff - Microchipping

GUIDING QUESTIONS

3. Do any local governments have any rangers or staff members that currently have qualifications that enable them to microchip dogs or cats?
The implanting of a microchip in a dog or cat is currently an act of veterinary science under the WA Vet Practice Act to be carried out by a registered Veterinarian or an Authorised Person (as defined in legislation). Microchipping is being proposed in the Tranche 2 review of the current regulations to be changed to not being an act of veterinary science and so would be able to be performed by any person. The position of the AVA contained in this policy: <https://www.ava.com.au/policy-advocacy/policies/identification-of-animals/electronic-identification-of-animals/>; is that the implanter should preferably be a veterinarian, because of the knowledge of aseptic technique, anatomy and pain relief required. The accountability of registered veterinarians fosters accuracy, confidentiality and expertise in record keeping. If state legislation permits implantation by non-veterinarians, this should only be permitted after a suitable training course and under the supervision of a registered veterinarian.
4. Are local governments interested in, and do they see a need for, their and/or staff to become qualified microchip implanters?
Currently only registered veterinarians and Authorised Persons (as defined in legislation) are able to implant microchips.

5.3 Update to microchip implanter qualification provisions

GUIDING QUESTIONS
<ol style="list-style-type: none"> 5. Are there any other additional qualifications that should be prescribed for the purposes of obtaining microchip implanter qualification? Veterinarian, Veterinary Nurse Cert IV or equivalent (Registerable as a Veterinary Nurse in WA) 6. While the current proposal intends to recognise existing qualifications, is there a need for relevant staff to upskill as microchip implanters? Refresher courses for those listed i - ix in 5.3 should be required as education on the advances and changes in animal handling and pain management would be beneficial for animal welfare.

Topic 6 - Dog and Cat Registrations

6.1 Local governments to keep record of registered dogs

GUIDING QUESTIONS
<ol style="list-style-type: none"> 1. How are microchip numbers currently validated? N/A 2. Do local governments get informed about disputed ownership matters under section 16A? If yes, how should the CRS deal with these? N/A 3. How should the CRS deal with district changes regarding registration in terms of apportioning fees/differing local laws? N/A 4. Is there a way to ensure sterilisation certificates issued by a vet (particularly if not through the CRS) are legitimate: note also link to digital certificates of registration e.g., sections 16(6)(a), 54D, 38U of the Dog Act and sections 11(1), 39(1) of the Cat Act. This would require confirmation from the veterinarian that is showing on the certificate that they did in fact issue the certificate, and that they are a) a registered veterinarian - by checking with the relevant Veterinary Board and b) that they issued the certificate - by contacting them. Difficulties could arise if the veterinarian is no longer registered (though they may have been at the time of the procedure) or are no longer contactable and/or no longer hold the record of the sterilisation procedure (ie the surgery was performed prior to the length of time that is required to hold the record). This verification process would be extremely onerous for the regulatory bodies involved. 5. Should the registration form include provision for details of all persons in control of a dangerous dog? Yes and that they are suitable to be in control (understand the restrictions imposed and have completed any other requirements). 6. Do commercial security dogs normally remain at premises they are guarding, or do they also have 'residential' premises? If both, should the CRS record both locations?

The term "commercial security dog" requires to be defined. The location of their work and residential locations should be provided.

7. Should the registration form note the usual times for commercial security dogs to be at each premises, where known, especially where these might be in different local government districts?

N/A

6.2 Dog Owner Number (DON)

GUIDING QUESTIONS

8. Will it be possible for the CRS to generate an expedited DON, if required?
N/A
9. Do local governments currently accept registration of entities other than individuals?
N/A
10. Is it possible to extract an individual from the entity?
N/A
11. How should overseas/interstate breeders who send dogs to WA be dealt with? Are there concerns with potential lack of enforcement?
The AVA welcome the supply of dogs from Puppy Farms being reduced through the introduction of a CRS with breeder approval, Pet shop approval and DON registration requirements. We would like to understand how responsible and reputable breeders from outside of WA will be able to supply animals to WA clients ie would animals originating from outside of WA be able to be obtained by approved pet shops or individuals if a DON can only be issued for animals that have been sourced from approved breeders under the WA regulations? Would harmonised regulations and recognition with other jurisdictions be required in order for this to be functional and enforceable?
12. How should persons liable for the control of a dangerous dog, rather than a dog owner (section 33K D Act) be dealt with?
N/A
13. Is there a need to record/register dogs that are not subject to the Act e.g., abandoned dogs at veterinarians, police dogs, refuge organisations?
The ability to cross check these with the CRS may facilitate finding the owner/responsible person for the animal where this is not known.
14. Are there additional refuge organisations that should be prescribed under section 7(3)(b) of the Dog Act (see current list of organisations under regulation 11 of the Dog Regulations)? If so, how can these organisations be identified and what processes should be in place to prescribe them?
N/A
15. How should dogs in remote areas or dogs with no specific place of residence be recorded in the CRS?
N/A

6.3 Recording applications that are refused/not renewed

GUIDING QUESTIONS

16. How do local governments currently deal with unregistered dogs?
With regards to the point in 6.3 "grounds upon which application (DON) cancelled"; dog destructive/diseased; Criteria would be required for what constitutes "destructive/diseased" and include how that has been confirmed and by who, as these are both aspects of animal welfare that would require a veterinary professional's assessment and opinion.
17. Do local governments get notified by the courts about court orders banning a person from owning or keeping a dog permanently or for a period specified (see section 46A(2))?
N/A
18. Would veterinarians notify contagious or infectious disease? What about notifiable diseases (ehrlichiosis)?
There is already a process in place for veterinarians to report notifiable disease to DPIRD. An internal government mechanism should then be used to communicate this to the CRS and any required action undertaken by the appropriate government department (eg contact tracing). Any other non notifiable

infectious/transmissible disease that is classified as significant for potential impact on Animal Welfare (eg canine parvovirus, distemper or heartworm disease) could be registered on the CRS by the attending veterinarian. The time to undertake this entering on the CRS would need to be compensated by the local government to the veterinarian, as this is an act of public good.

6.4 Registration certificate

GUIDING QUESTIONS

19. What changes should be made to Form 5 (Registration Certificate) of the Dog Regulations?
N/A

6.5 Local governments to keep record of registered cats

GUIDING QUESTIONS

20. How are local governments currently notified when cat owners move to another local government area?
N/A
21. Are there organisations that should be exempt from registration (for instance, section 5(2)(c) Cat Act), or are the entities prescribed as exempt under regulation 9 of the Cat Regulations sufficient?
The AVA would like to confirm that Veterinary Practices are exempt from requiring to register cats who may be kept at their premises eg for re-homing

Topic 7 - Miscellaneous

7.1 Establishment and maintenance of the CRS

GUIDING QUESTIONS

1. Who should be able to access the CRS and what information should they have access to read and record?
The AVA requests that the definition of "Community" be provided for the "Accessibility of CRS (including third parties)". Additional to the users listed in 7.1, access should also be provided to appropriate and approved human welfare and social service organisations. It must be recognised that the ownership of an animal can be integral to the welfare of its owner, and the animal's own welfare is connected to that of its owner.
2. What other items/matters should be prescribed in the regulations in relation to the maintenance and accessibility of the CRS?
N/A

7.2 Information to be recorded to facilitate the management of cats

GUIDING QUESTIONS

3. What information should be prescribed for recording into the CRS that balances the time required to provide information (and update information) with maximising compliance in cat management in the public interest?
N/A
4. How is the local government informed about a review of a LG decision/objection in the SAT regarding cat registration?
N/A

7.3 Information to be recorded in CRS to assist with dog management

GUIDING QUESTIONS	
5.	How is the local government informed about a review of a LG decision/objection in the SAT regarding a dangerous dog declaration? N/A
6.	<p>Should historic information about dog attacks and incidents be migrated into the CRS?</p> <p>The AVA wishes to highlight its position on the management of "Dangerous dogs": In 2012 the AVA published a comprehensive report (Dangerous Dogs – A Sensible Solution) into the management of dog aggression in the community. The report sets out the facts about dog bites in Australia, along with a detailed critique of breed-specific legislation that bans particular breeds of dog perceived to be more inclined to be aggressive.</p> <p>The AVA, along with the national veterinary associations of Britain, the United States and Canada, recognise that breed-specific approaches to dog regulation are not effective, as they don't protect the public by reducing dog bite incidents. Dog bites are the result of a complex behaviour caused by the interaction of many factors.</p> <p>While regulation is an important foundation, an effective policy response to reduce dog bites must also include: Identification and registration of all dogs. A national reporting system with mandatory reporting of all dog bite incidents to the national database. Comprehensive education programs for children, parents, pet owners and dog breeders. Enforcement of all dog management regulations. Temperament testing to understand the risks and needs of individual animals to help owners make more appropriate choices for their new pets, and to guide breeders to improve the temperament of puppies.</p> <p>Resourcing is often a major barrier to effective enforcement. This problem needs to be addressed to achieve tangible reductions in dog bite incidents.</p> <p>We are advocating for a legislative approach based on identifying individual potentially dangerous animals and giving local government authorities the power to intervene before they inflict harm.</p>

7.4 Issuing infringement notices through the CRS

GUIDING QUESTIONS	
7.	How are contraventions/non-compliance/offences under the Dog Act or the Cat Act currently recorded? N/A
8.	<p>Should other changes be made to prescribed infringement notices?</p> <p>The AVA request clarification around proposed amendments to regulations 34 and 35 and the additional offences: Failure of a vet to give a certificate of sterilisation to the owner of the dog (s26G — penalty is \$5000).</p> <p>Specifically, how a failure to provide a certificate is determined.</p>
9.	<p>Are existing modified penalties adequate? If not, should they be reviewed?</p> <p>Penalties should be designed using a points system rather than a set dollar value. This will allow for changes to be made more readily to maintain as contemporary.</p>

7.5 Form for appointment of owner's delegate

GUIDING QUESTIONS	
10.	<p>What other details should be included in the prescribed form for the appointment of an owner's delegate?</p> <p>Regarding 7.5, Part A: declaration that the owner has consented to the delegation; this should also include a declaration that the delegate understands and accepts responsibility of the ownership being delegated to them.</p> <p>Will there be criteria for the reasons that are acceptable for a delegate to be required?</p> <p>Additionally, confirmation should be provided that the owner has completed all details of the owner form and is approved as an owner before a delegate can be approved. This should include the reason why a delegate is required, and that the reason is acceptable, if criteria are set for this.</p>

7.6 Form for change in ownership

GUIDING QUESTIONS

11. What other details should be included?
N/A

7.7 Advertising material for the transfer of Dogs

GUIDING QUESTIONS

12. What other details should be included?
1. Dog breed. 2. If the dog has been through an approved Pet Shop then a copy of any Health Assessment undertaken at that time should be included - as this may outline chronic/inherited/genetic conditions.

7.8 Licensing of approved kennel establishments

GUIDING QUESTIONS

13. How are local governments notified of the review of decisions in SAT regarding approved kennel establishment decisions?
N/A

7.9 Warrants

GUIDING QUESTIONS

14. How are warrants currently issued by local governments?
N/A
15. How do local governments keep record of warrants issued?
N/A

7.10 Investigations and enforcement

GUIDING QUESTIONS

16. What other training, upskilling or enforcement assistance do rangers and local government staff need to administer and enforce the requirements under the legislation?
N/A