

Submission: Proposed Animal Welfare Standards for Dogs

This template is intended to be used in conjunction with the Discussion Paper and assist you in providing feedback about the proposed Animal Welfare Standards for Dogs. It is designed for use with windows operating systems and, due to its length, is best suited for submissions made by email. An alternative, simpler template is also available. It is not necessary to make your submission using this template nor do you need to comment on all of the standards.

All submissions will be treated as public documents and may be made available on the Department's website, unless a specific request is made in writing to treat a submission as confidential, either in whole or in part.¹ No personal details other than the name of individual submitters will be disclosed. All other personal contact details will be kept private and held by DPIPWE solely for the purposes of the development of the proposed legislation.

The template is divided into 4 sections:

³⁵₁₇ Your details

³⁵₁₇ Feedback on the proposed *Animal Welfare Standards and Guidelines for Dogs – Domestic Animal Business*

³⁵₁₇ Feedback on the proposed *Animal Welfare Standards and Guidelines for Dogs – Private*

³⁵₁₇ Additional comments and confidentiality

Providing information about costs:

³⁵₁₇ It is not necessary to provide an estimate of costs but we would like to know whether or not the proposed standards are likely to impose costs on you (or members of your organisation).

³⁵₁₇ If you are responding on behalf of an organisation, you may provide an estimate of costs to your members if you wish.

³⁵₁₇ If you are responding on behalf of a domestic animal business, please provide information only about costs likely to be incurred by that particular operation.

¹ **The Right to Information Act 2009 and confidentiality**

By law, information provided to the Government may be provided to an applicant under the provisions of the *Right to Information Act 2009* (RTI). When making your submission, please detail any reasons why you consider the information that you have provided is confidential or should not be publicly released. Your reasons will be taken into account in determining whether or not to release the information in the event of an RTI application.

³⁵₁₇ If you are responding in an individual capacity, please provide information only about costs that you are likely to incur.

If you have made a submission on behalf of an organisation, you may also make a submission in an individual capacity if you wish.

If you require further information, a hard copy of the discussion paper or assistance in making a submission, please contact the Executive Officer of the Animal Welfare Advisory Committee by phoning DPIPWE on 1300 368 550.

Send your submission by email or post to:

Email: AnimalWelfare.Enquiries@dpiuwe.tas.gov.au

Post: Executive Officer
Animal Welfare Advisory Committee
Department of Primary Industries, Parks, Water and Environment
13 St Johns Avenue
New Town TAS 7008

Submissions must be received no later than **5pm Friday 22 November 2013**.

Using this template

Next to each question is a response box.

If the text in the box says "Click here to enter text", simply click on the text and type your response.

If the text in the box says “Choose an item”, click on the text and a down arrow will appear to the right of the text. Click on the down arrow and a drop-down list of responses will appear. Select your response by clicking on it.

Note that this template is designed to operate with Windows.

Your details

Fields marked with an asterisk (*) are mandatory

No personal details other than the name of individual submitters will be disclosed. All other personal contact details will be kept private and held by DPIPWE solely for the purposes of the development of the proposed legislation.

Name*

Kerry Smith, Executive Officer, Tasmanian Canine Association Inc

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Business

Registration and Regulation of Pedigree Dogs

Organisation

Tasmanian Canine Association Inc trading as Dogs Tasmania

Animal Welfare Standards and Guidelines for Dogs – Domestic Animal Business

1.1. Do you support having enforceable minimum standards for the care and management of dogs that apply to ‘domestic animal businesses’ – that is:

³⁵₁₇ Any dog breeding enterprise that has three or more fertile females other than working dogs or hunting dogs (as defined in the *Dog Control Act 2000*) and sells dogs (whether a profit is made or not); or

³⁵/₁₇ animal shelters, pounds and pet shops; and

³⁵/₁₇ dog rearing, training or boarding enterprises that are run for profit and accommodate dogs overnight?

If not, why not?

We generally support having enforceable minimum standards for the care and management of dogs.
We believe that TCA members who are subject to rigorous control by our Association should be classified in the same category as working dogs and hunting dogs for the purpose of a domestic animal business.
We cannot however agree with the definition which describes a domestic animal business as having three fertile bitches used for breeding. It is understood that Victoria has changed their definition to allow nine fertile females for Dogs Victoria members and this being the case we would support nine fertile females for Dogs Tasmania members.
(see appendix A)

- 1.2. Do you support the minimum standards for dogs kept by domestic animal businesses as drafted? **The TCA Inc do not support all of the drafted minimum standards as listed in your discussion paper. Our concerns are listed in the document.**

Choose an item.

2. Considering the definition of 'domestic animal business' is it likely that the proposed *Animal Welfare Standards and Guidelines for Dogs – Domestic Animal Business* will apply to you (or members of the organisation that you represent)? **The definition of a 'domestic animal business' as outlined in the discussion paper would have a detrimental impact on a significant number of our members and on the health and genetic viability of our breeds, if however our proposal to increase the number of fertile bitches to nine for Dogs Tasmania members was accepted as has happened in Victoria for Dogs Victoria members , the majority of our members would be categorised as private.**

Choose an item.

3. **Comments on the standards**

Please refer to the Discussion Paper for definitions of terms used in these standards.

Responsibilities and skills of staff

1.1. A person in charge of a facility is responsible for the facility complying with these standards.

No Comment

1.2. A person must be present at the facility each day to meet the requirements of these standards, and must have the relevant knowledge, experience and skills to provide for:

³⁵₁₇ the care and welfare of dogs;

³⁵₁₇ the feeding and watering of dogs;

³⁵₁₇ the protection of dogs from distress and injury caused by other animals or interference by people;

³⁵₁₇ cleaning and hygiene in the facility; and

³⁵₁₇ identification of signs of ill health and common diseases of dogs.

A person must be in attendance at the facility each day to meet the requirements of these standards, and must have the relevant knowledge, experience and skills to provide for:

We believe 1.2 is ambiguous and the words be present should be replaced with the word be in attendance.

1.3. A person caring for dogs in the facility who does not meet the requirements of Standard 1.2 must work under the supervision of a person who is trained and experienced in the care of dogs in accordance with Standard 1.2 and who provides instruction where required.

1.1

Not sure

Not sure

Regardless of whether the definition of domestic animal business is amended from three entire breeding bitches to nine entire breeding bitches some of our members will be effected, TCA Inc does not have specific information in respect to any individual domestic animal business and we believe individual submissions will be made that will provide this information

3.1.3. Do you have any additional comments about standards relating to the responsibilities and skills of staff?

TCA Inc has a Code of Ethics and numerous regulations regarding breeding as well as providing written material and support to TCA Inc Members. Our members are bound by the Code of Ethics and Regulations and failure to comply will result in sanctions, we believe our requirements are in excess of what has been proposed in the act. The Association's affiliate clubs also provide both written advice and physical training which members of the public have access to. See Appendix B.

Quality Management Systems

2.1. The following information must be recorded in relation to each dog held at a facility except where the facility is a pound or animal shelter and the information cannot be reasonably ascertained:

- ³⁵₁₇ the name of the dog or an individual identifier;
- ³⁵₁₇ sex (including whether desexed);
- ³⁵₁₇ breed type, colour and distinguishing features;
- ³⁵₁₇ the date of birth (or approximate age if it is not possible to ascertain the date of birth);
- ³⁵₁₇ the number of any microchip implanted in the dog;
- ³⁵₁₇ the council registration number of the dog if the dog is registered;
- ³⁵₁₇ in relation to puppies which are to be rehomed, the microchip number of the dam (unless an exemption under section 15A of the *Dog Control Act 2000* applies) and the council registration number of the dam;
- ³⁵₁₇ the name, address and telephone number of the owner or lessee of the dog;
- ³⁵₁₇ in relation to leased dogs or boarding dogs, the name and contact telephone number of the veterinary surgeon who normally attends the animal;
- ³⁵₁₇ vaccination status (including if unknown) ;
- ³⁵₁₇ details of any known special medical and dietary requirements;
- ³⁵₁₇ the date of acquisition/arrival at the facility; and
- ³⁵₁₇ if a dog is no longer held at the facility, the details of the dog's death or departure. This must include the date and, in the case of departure, the dog's destination and the name of the person who assumed care or charge of the dog.

No Comment

2.2. Records must be retained for no less than five years at the facility, and the person in charge must be able to produce the records on request.

Suggested amendment

Records must be retained for no less than three years at the facility, and the person in charge must be able to produce the records on request.

Five years considered excessive maximum of three years preferably less.

2.3. If a litter of pups is bred, the person with care or charge of the dam at the time of whelping must keep a record of the following:

³⁵/₁₇ the name of the dam;

³⁵/₁₇ the council registration number of the dam;

³⁵/₁₇ the owner of the dam;

³⁵/₁₇ the microchip number of the dam (unless an exemption under section 15A of the *Dog Control Act 2000* applies);

³⁵/₁₇ the date of whelping; and

³⁵/₁₇ identification details of each animal in the litter, including any abnormalities or deaths.

Suggested amendment

We believe the second requirement should read:-

The council registration number of the dam where there is no microchip number.

Because Council registration numbers change from year to year so microchip numbers are more effective for traceability.

3.1.4. Do you have any additional comments about standards relating to quality management systems?

In relation to the dog population generally a significant number of dogs are not registered with the Council or have moved address we believe that mandatory microchipping is the only appropriate way to permanently identify a dog. Please note that the TCA Inc has had compulsory microchipping for our members since 1 October 2005. The AVA require dogs to be microchipped to verify test results that the TCA Inc requires prior to registering a litter for a breed that has mandatory health testing . Council registration is not a proven form of identification, microchip numbers are a permanent traceable means of identification. TCA Inc members are bound by our Code of Ethics to comply with Local Government requirements.

Animal Housing

3.1. Each dog must be provided with protection from rain and wind, direct sunlight, extremes of temperature or other adverse weather conditions.

No Comment

3.2. Each dog must be provided with a clean and dry dedicated sleeping area.

No Comment

3.3. Enclosures in which dogs are ordinarily housed must meet the minimum enclosure sizes shown in Table 1 below. These limits do not apply to dogs being transported, dogs under veterinary care for a disease or injury or puppies in pet shops that are between 8 and 16 weeks of age.

No Comment

3.4. Dogs must not be confined in a crate with the door closed unless:

³⁵/₁₇ the dog has been or is being trained to accept confinement in a crate; and

³⁵/₁₇ the period of such confinement does not exceed a total of 8 hours a day.

Suggested amendment

The period of such confinement does not exceed a total of ten hours a day.

Eight hours altered to ten hours total in a day

Rationale

Ten hours crate confinement allows for overnight sleeping, dogs are less likely to bark or cause a nuisance

To neighbours. Crating from 9pm to 6am is nine hours and these are the times that barking causes concern in the community.

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3.5. Dogs must not be housed in contact with wet floors without access to a dry place to lie.

No Comment

3.6. Sleeping areas for dogs must have clean, hygienic, and dry bedding which is:

³⁵/₁₇ appropriate to the breed;

³⁵/₁₇ sufficient for the number of animals held: and
³⁵/₁₇ sufficient to prevent thermal or other physical discomfort.

Suggested amendment

Sleeping areas must be clean hygienic and dry. Delete the word “bedding” we believe the word bedding is confusing and in some cases bedding is the incorrect term for dogs that sleep on hammock beds etc.

Rationale

Bedding can be a health issue for dogs as some of them will eat their bedding i.e. blankets, doonas etc

3.7. In dog housing that is fully enclosed and forced ventilation is the only means of ventilation the following is required:

- ³⁵/₁₇ an air change rate of 8-12 changes per hour;
- ³⁵/₁₇ even distribution of fresh air to all areas holding dogs;
- ³⁵/₁₇ the air temperature must be maintained in the range of 15 to 27°C;
- ³⁵/₁₇ in the case of air recirculation, effective air cleaning and filtration units to ensure the removal of infectious organisms and chemicals; and
- ³⁵/₁₇ an operational and effective back-up and alarm system in case of power failures or breakdown of ventilation or temperature control.

Suggested amendment

the air temperature must be maintained in the range of 15 to 27°C add unless this temperature is not appropriate for the breed

Rationale

We have breeds from every climate in the world and in some cases the range of 15 to 27°C can be uncomfortable for some breeds if continuous.

3.8. Dog housing must be fitted with a secure closing device that cannot be opened by the dogs held.

No Comment

3.9. All potential poisons and substances that are harmful to dogs, whether in storage or in use, must be kept out of reach of dogs.

No Comment

3.10. Incompatible dogs must not be housed in an enclosure together.

No Comment

3.11. Dogs must not be tethered for periods exceeding 30 minutes unless:

- ³⁵/₁₇ the dog has been trained to accept tethering;
- ³⁵/₁₇ the dog is provided with additional supervision;
- ³⁵/₁₇ water and weatherproof shelter are available and within the dog's reach at all times;
- ³⁵/₁₇ the dog's collar is fitted with a swivel to which the tether is attached and is checked daily; and
- ³⁵/₁₇ the dog is provided with daily exercise off the tether in accordance with provision 4.6 and 4.7.

Suggested amendment

the dog's tether is fitted with a swivel to which the collar is attached and is checked daily; and

Rationale

Please note whilst few of our members tether dogs, sometimes dogs need to be tethered for various reasons including:

i) the need to separate a dog at short notice ii) dogs that are psychologically unsuited to cages, pens or confinement (in particular some large males will pace, slather, dig or throw themselves at the wire to the point of injuring themselves but can be happily tethered).

Dogs that are tethered for these reasons need to be able to be tethered overnight in order to eliminate the possibility of chasing livestock or wildlife. Tethered dogs still need to be provided with water, shelter and a comfortable sleeping space.

3.12. Dogs less than four months old, bitches in season and bitches about to whelp must not be tethered.

No Comment

3.13. Dogs must not be tethered to a moveable object or adjacent to a fence in a manner that places them at danger of death by hanging.

No Comment

3.14. Dogs in the care or charge of a domestic animal business must not be tethered continuously for a period exceeding 3 hours.

No Comment

3.15. Enclosed dog housing must be provided with ventilation that is sufficient to maintain the health of the animals and keep the area free of noxious odours, dampness and draughts.

No Comment

3.16. Facilities or housing must be designed, constructed, serviced and maintained in a way that:

- ³⁵/₁₇ provides for the good health and welfare of the dogs;

- ³⁵/₁₇ minimises the risks of transmission of infectious disease agents;
- ³⁵/₁₇ minimises the risk of injury to animals.
- ³⁵/₁₇ prevents the escape of dogs; and
- ³⁵/₁₇ enables it to be secured to prevent access to the facility by unauthorised people.

No Comment

3.17. Dog housing must be fitted with a secure closing device that cannot be opened by the dogs held.

No Comment

3.18. Facilities must have a water supply, adequate to meet the daily requirements of the dogs housed at the facility.

No Comment

3.19. Facilities must have an isolation area available either at the facility or at a veterinary clinic to which the domestic animal business has reasonable access, and must have demonstrable biosecurity measures in place.

No Comment

3.20. The duration and intensity of artificial lighting, where used in a facility, must be as close as is reasonable to conditions that occur naturally, sufficient to allow thorough inspection and observation of dogs.

No Comment

3.3.3. Do you have any additional comments about standards relating to animal housing?

Bedding is confusing and not defined, it can be a health issue for dogs that eat bedding i.e. blankets, doonas etc

Animal Management – Animal Care

4.1. Each weaned dog must be individually identified.

No Comment

4.2. Each unweaned pup must be identified such that the identity of its dam can be readily ascertained.

No Comment

4.3. Measures must be implemented to protect dogs from distress or injury caused by other animals.

No Comment

4.4. Undesexed dogs must be housed securely such that an entire male dog does not have access to a female in season (or vice versa) unless there is an intention to breed.

No Comment

4.5. Dogs must be provided with the opportunity to exercise for no less than 10 minutes at least twice daily and for at least 40 minutes in total each day.

Suggested amendment

Dogs over six months of age must be provided with the opportunity to exercise for no less than ten minutes at least twice daily and for at least forty minutes in total each day

4.6 Weaned dogs must have the opportunity to exercise for a total of at least 60 minutes each day unless the floor space in the enclosure in which they are ordinarily housed meets or exceeds the requirements in Table 3 below.

Suggested amendment

Dogs over six months of age must have the opportunity to exercise for a total of at least sixty minutes each day unless the floor space in the enclosure in which they are ordinarily housed meets or exceeds the requirements in Table 3 below.

Please note that exercise times may need to be restricted for some of the large/giant breeds.

4.7 Exercise requirements in provisions 4.5 and 4.6 do not apply if:

³⁵/₁₇ there is written advice from a veterinary surgeon that the dog should not undertake such exercise; or

³⁵/₁₇ the person with care or charge of the dog can satisfactorily demonstrate that the dog has an injury or illness which requires the dog to be rested and the period without exercise has not exceeded 3 days.

No Comment

4.8 Dogs must not be exercised in any way that poses an unreasonable risk of serious injury. Prohibited methods include exercising a dog attached to a

motor vehicle, or unsupervised exercise on a treadmill.

No Comment

4.9 Exercise areas at a facility must be supervised to ensure that dogs contained within it are not incompatible.

No Comment

4.10 Dogs must be groomed as required to ensure that dogs' coats are not left dirty, matted, tangled or unkempt.

Suggested amendment

Dogs must be groomed as required to ensure that dogs' coats are not left dirty, matted, or tangled so as to affect the health of the dog.

Rationale

Dogs must be groomed as required to ensure that dogs' coats are not left dirty, matted, tangled so as to affect the health of the dog. Some registered breeds are meant to have an unkempt look i.e. Deerhound, Komondor, Puli, Pumi.

Animal Management – Food and Water

5.1. Clean water must be provided to all dogs at a temperature, quantity and quality that meet the physiological needs of the dog.

No Comment

5.2. Dogs must be fed at least once daily.

No Comment

5.3. Dogs must receive a balanced and complete diet in sufficient quantity, and supplied at a frequency, that:

³⁵/₁₇ is appropriate to the dog's age, breed and physiological status; and

³⁵/₁₇ maintains a healthy body condition and, if appropriate, allows for growth and reproduction.

Suggested amendment

Dogs must receive an appropriate diet in sufficient quantity, and supplied at a frequency, that:

³⁵₁₇ is appropriate to the dog's age, breed and physiological status; and

³⁵₁₇ maintains a healthy body condition and, if appropriate, allows for growth and reproduction

Rationale

Balanced and complete diet is a market ploy, what is balanced and complete for one dog could cause problems for another, for example some dogs cannot cope with high protein levels and another high fat levels.

5.4. Puppies under four months of age must be offered a sufficient quantity of a balanced and complete diet at least three times daily, from three weeks of age. Puppies must be fed such that they are not without food for more than 12 hours.

Suggested amendment

Puppies under four months of age must be offered a sufficient quantity of an appropriate diet at least three times daily, from three weeks of age. Puppies must be fed such that they are not without food for more than twelve hours.

Rationale

Balanced and complete diet is a market ploy, what is balanced and complete for one dog could cause problems for another, for example some dogs cannot cope with high protein levels and another high fat levels.

5.5. Dogs that are co-housed with other animals must be monitored during feeding to ensure that each dog is able to eat sufficient food to meet their physiological needs.

No Comment

5.6. Food and water containers must be removed, cleaned and replaced immediately if noticed to be contaminated or spoiled such that the quality of the food or water is significantly affected. Contaminants that significantly affect the quality of food or water include (but are not limited to) urine, faeces and vomitus.

No Comment

5.7. Food provided to dogs must be prepared and stored hygienically and served in clean, non-spill containers that are not likely to cause injury to the dogs.

Suggested amendment

Food provided to dogs must be prepared and stored hygienically and served in clean, containers that are not likely to cause injury to the dogs.

Non spill containers are not suited to all breeds and are more difficult to clean.

5.8. Puppies from four to six months of age must be offered a sufficient amount of a balanced and complete diet at least twice daily.

Suggested amendment

Puppies from four to six months of age must be offered a sufficient amount of an appropriate diet at least twice daily.

3.5.3. Do you have any additional comments about standards relating to animal care?

Balanced and complete diet is a market ploy, what is balanced and complete for one dog could cause problems for another, for example some dogs cannot cope with high protein levels and another high fat levels.

Cleaning and Disinfection

6.1. Bedding must be checked daily and maintained in a clean condition.

Suggested amendment

The sleeping area must be checked daily and maintained in a clean condition.

Rationale

Bedding is confusing and not defined, it can be a health issue for dogs that eat bedding i.e. blankets, doonas etc.

6.2. All areas used to house dogs must be cleaned and disinfected before new animals are introduced.

No Comment

6.3. Areas housing dogs within a facility must be cleaned at least once daily.

No Comment

6.4. Exercise areas in a facility must be inspected and appropriate action taken to ensure that they are clean and free of faeces each day and before new dogs are introduced to the area.

No Comment

6.5. Food preparation and storage areas, food and water containers, and utensils and equipment used in the preparation and provision of food, must be maintained to a hygienic standard.

No Comment

6.6. All dead animals must be disposed of promptly and hygienically, and in accordance with the requirements of the local government authority, the relevant government department or other authorities.

No Comment

6.7. Pens and cages housing whelping bitches must be disinfected prior to whelping and again after the young have been removed.

No Comment

Transport

7.1. Dogs must be transported in a manner appropriate for their size, age and physiological status.

No Comment

7.2. Incompatible animals must be physically separated during transport to prevent injury, harm or distress.

No Comment

7.3. Dogs must be properly tethered or restrained when on the back of a moving vehicle or trailer, in a manner that prevents the dog falling, hanging off the vehicle or being injured. The only exemption to this is a dog actively being used to move livestock.

No Comment

7.4. During transport, dogs must be provided with ventilation and shade adequate to maintain good health and avoid distress.

No Comment

7.5. Dogs must not be left unattended in a vehicle if there is a possibility of heat stress occurring or in situations of extreme cold.

No Comment

7.6. All vehicles used extensively for the purpose of transporting dogs must be cleaned between consignments of dogs and appropriate measures taken to minimise the transmission of infectious disease agents.

No Comment

Health and welfare checks

8.1. All dogs must be inspected at least once daily to monitor their health and welfare.

No Comment

8.2. Puppies under 4 months of age, bitches in the last week of pregnancy, lactating bitches and dogs recovering from illness or injury or otherwise requiring special care must be inspected to monitor their health and welfare:

³⁵₁₇ as often as is required to enable reasonable intervention to mitigate preventable risks to health and welfare; and

³⁵₁₇ no less than twice daily.

No Comment

8.3. Where there is evidence that whelping has commenced (eg straining or contracting) and there is no progress within two hours, advice must be sought from a veterinary surgeon and appropriate action taken.

Suggested amendment

Where there is evidence that whelping has commenced (eg straining) and there is no progress within two hours, advice must be sought from a veterinary surgeon and appropriate action taken.

8.4. A person inspecting a dog to monitor their health and welfare must note all adverse observations. Observations must be made with respect to (but are not limited to);

³⁵₁₇ eating;

³⁵₁₇ drinking, including puppies drinking milk;

³⁵₁₇ defaecation;

³⁵₁₇ urination;

³⁵₁₇ behaviour;

³⁵₁₇ whether there are signs of illness or distress;

³⁵₁₇ physical movement; and

³⁵/₁₇ coat condition.

No Comment

8.5. Any changes in the health status of a dog must be promptly reported to the person in charge of the facility for appropriate action.

No Comment

Veterinary Care

9.1. Appropriate veterinary treatment must be provided for sick or injured dogs.

No Comment

9.2. Dogs at a facility that are known or suspected to be suffering from a significant infectious disease or severe injury must be taken directly to the isolation area unless:

³⁵/₁₇ written assurances from a registered veterinary surgeon regarding the appropriateness of housing with other animals is received; or

³⁵/₁₇ there are reasonable grounds for not doing so.

No Comment

9.3. Reasonable measures must be taken to:

³⁵/₁₇ prevent dogs from contracting distemper, infectious canine hepatitis, parvovirus,

³⁵/₁₇ protect dogs from common infectious diseases; and

³⁵/₁₇ control internal and external parasites.

No Comment

9.4. The person in charge of a facility must establish liaison with a veterinary surgeon who is able to attend to dogs, and is able to advise on disease prevention measures.

No Comment

9.5. The contact details for the veterinary surgeon must be posted in a location within the facility that enables all persons who care for dogs in the facility to see them.

No Comment

9.6. Domestic animal businesses must have a documented health plan developed in consultation with a veterinary surgeon, which details measures taken to prevent common infectious disease and control and treat internal and external parasites.

Suggested amendment

Domestic Animal businesses must have a documented health plan developed for the facility

Euthanasia

10.1. Euthanasia must be performed by the intravenous administration of an overdose of pentobarbitone sodium by a veterinary surgeon unless there are reasonable grounds for using another method of euthanasia, in which case, the method used must reliably induce rapid unconsciousness followed by death whilst the dog is unconscious.

No Comment

10.2. Dogs and puppies must not be intentionally killed by being drowned, poisoned or gassed with motor exhaust fumes.

No Comment

10.3. Euthanasia must be conducted in an area that is separated from animal accommodation at the facility and must not be carried out in view of other animals or the general public.

No Comment

Breeding and rearing

11.1. Bitches under 12 months of age must not be intentionally be mated during their first oestrous cycle.

Dogs under twelve months of age must not be mated as required under the Dogs Tasmania Code of Ethics. Refer Appendix B.

11.2. Bitches must not have more than two litters in any eighteen month period.

No Comment

11.3. All reasonable measures must be taken to ensure that a dog is physically and mentally fit, healthy and free of disease at the time of being mated.

No Comment

11.4. During mating, breeding pairs must be isolated from the remaining breeding population, and monitored by the person in charge or a suitably trained and experienced staff member.

Suggested amendment

During mating, breeding pairs must be isolated from the remaining breeding population, and monitored by the person in charge or a suitably experienced person.

11.5. During whelping, bitches must be isolated from the remaining breeding population, and monitored by the person in charge or a suitably trained and experienced staff member on a regular basis to ensure that the birth proceeds in a normal manner.

Suggested amendment

During whelping, bitches must be isolated from the remaining breeding population, and monitored by the person in charge or a suitably experienced person on a regular basis to ensure that the birth proceeds in a normal manner.

11.6. Whelping bitches must be provided with a suitable place to whelp lined with clean bedding. The bedding in a whelping area must be checked daily and maintained in a clean condition.

No Comment

11.7. A puppy must not be separated from its litter or lactating mother prior to weaning, except where it is in the interests of the welfare of the puppy or its mother.

No Comment

11.8. Puppies must be monitored to ensure that they achieve a steady weight gain every week.

No Comment

Transfer of Ownership

12.1. With respect to the sale of puppies, the council registration number, and the name of the council where registered, of the dam of the puppy must be disclosed in any advertisement and at the point of sale.

Suggested amendment

With respect to the sale of puppies, the microchip number of the dam of the puppy must be disclosed in any advertisement and at the point of sale.

12.2. Puppies must not be rehomed prior to spontaneous weaning or before they are 6 weeks of age, whichever occurs sooner.

Suggested amendment

Puppies must not be rehomed before they are at least eight weeks of age and have been microchipped and the details recorded on a National Database.

12.3. A person rehoming a dog must advise the prospective owner of the vaccination status of the dog. If the prospective owner is advised that the dog is currently vaccinated, the prospective owner must be provided with a signed vaccination certificate that provides the following information:

³⁵/₁₇ the date of last vaccination;

³⁵/₁₇ the diseases against which the dog is vaccinated;

³⁵/₁₇ the date when vaccination against each disease is next due;

³⁵/₁₇ the name of the veterinary surgeon (if any) who was responsible for vaccinating the dog.

No Comment

12.4. All puppies that are sold must be vaccinated against distemper, hepatitis and parvovirus in accordance with veterinary advice prior to rehoming.

No Comment

12.5. A person rehoming a dog must advise the prospective owner when the dog was last health checked by a veterinary surgeon.

No Comment

12.6. A dog suspected of being or known to be sick, injured, deformed, diseased or pregnant may not be rehomed unless the dog's condition is fully disclosed to the prospective owner prior to any rehoming agreement being finalised.

No Comment

12.7. Dogs that are known to be poorly socialised or aggressive or are known to have recognised vices such as excessive barking or fence jumping must not be rehomed unless a suitable prospective owner can be found to whom the dog's condition is fully disclosed prior to any

rehoming agreement being finalised.

No Comment

12.8. All dogs that are rehomed must be treated to remove gastrointestinal parasites prior to release.

No Comment

12.9. At the time of purchase, clients must be offered accurate written information, at no charge, regarding the appropriate care of the dog purchased.

No Comment

12.10. All dogs over 6 months of age, or of unknown age, which are sold, must be microchipped prior to release.

Suggested amendment

All dogs over eight weeks of age which are sold or rehomed, must be microchipped prior to release and the microchip number recorded on a National Database.

TCA Inc requires all puppies to be microchipped prior to registration so as to enable the dog to be traced by the breeder through every stage of ownership.

12.11. A person must not rehome a dog to a person if they have reasonable grounds to believe that the prospective owner will not adequately provide for the dog's health and welfare.

No Comment

Animal Welfare Standards and Guidelines for Dogs – Private

4.1. Do you support having enforceable minimum standards for the care and management of dogs that apply to all privately owned dogs?

If not, why not?

We support having enforceable minimum standards for the care and management of dogs.

4.2. Do you support the minimum welfare standards for privately kept dogs as drafted?

Please refer to our suggested alterations.

Choose an item.

5. Do you own or have care or charge of a dog that would require you to comply with these standards? N/A

Choose an item.

6. Comments on standards for privately kept dogs

Animal Housing

1.1. Each dog must be provided with protection from rain and wind, direct sunlight, extremes of temperature or other adverse weather conditions.

No Comment

1.2. Each dog must be provided with a clean and dry dedicated sleeping area.

No Comment

1.3. Enclosures in which dogs are ordinarily housed must meet the minimum enclosure sizes shown in Table 1 below. These limits do not apply to dogs being transported or dogs under veterinary care for a disease or injury.

No Comment

- 1.4. Dogs must not be confined in a crate with the door closed unless:
- ³⁵₁₇ the dog has been or is being trained to accept confinement in a crate; and
 - ³⁵₁₇ the period of such confinement does not exceed a total of 8 hours a day.

Suggested amendment

the period of such confinement does not exceed a total of ten hours a day.

Eight hours altered to ten hours total in a day

Rationale

Ten hours crate confinement allows for overnight sleeping, dogs are less likely to bark or cause a nuisance to neighbours. Crating from 9pm to 6am is nine hours and these are the times that barking causes concern in the community.

- 1.5. Incompatible dogs must not be housed in an enclosure together.

No Comment

- 1.6. Dogs must not be housed in contact with wet floors without access to a dry place to lie.

No Comment

- 1.7. Sleeping areas for dogs must have be clean, hygienic, and dry bedding which is:

³⁵₁₇ appropriate to the breed;

³⁵₁₇ sufficient for the number of animals held: and

³⁵₁₇ sufficient to prevent thermal or other physical discomfort.

Suggested amendment

Sleeping areas must be clean hygienic and dry delete the word bedding we believe the word bedding is confusing and in some cases bedding is the incorrect term for dogs who sleep on hammock beds etc.

RATIONALE:

Bedding can be a health issue for dogs as some of them will eat their bedding i.e. blankets, doonas etc

- 1.8. Dog housing must be fitted with a secure closing device that cannot be opened by the dogs held.

No Comment

1.9. Enclosed dog housing must be provided with ventilation that is sufficient to maintain the health of the animals and keep the area free of noxious odours, dampness and draughts.

No Comment

1.10. In dog housing that is enclosed and forced ventilation is the only means of ventilation the following is required:
an air change rate of 8-12 changes per hour;
even distribution of fresh air to all areas holding dogs;
the air temperature must be maintained in the range of 15 to 27°C;
in the case of air recirculation, effective air cleaning and filtration units to ensure the removal of noxious chemicals and infectious organisms; and
an operational and effective back-up and alarm system in case of power failures or breakdown of ventilation or temperature control.

Suggested amendment

the air temperature must be maintained in the range of 15 to 27°C add unless this temperature is not appropriate for the breed

Rationale

We have breeds from every climate in the world and in some cases the range of 15 to 27°C can be uncomfortable for some breeds if continuous

1.11. Dogs must not be tethered for periods exceeding 30 minutes unless:

- ³⁵/₁₇ the dog has been trained to accept tethering;
- ³⁵/₁₇ the dog is provided with additional supervision;
- ³⁵/₁₇ water and weatherproof shelter are available and within the dog's reach at all times;
- ³⁵/₁₇ the dog's collar is fitted with a swivel to which the tether is attached and is checked daily; and
- ³⁵/₁₇ the dog is provided with daily exercise off the tether in accordance with standards 2.5 and 2.6.

Suggested amendment

the dog's tether is fitted with a swivel to which the collar is attached and is checked daily; and

Please note whilst few of our members tether dogs, sometimes dogs need to be tethered for various reasons including:

i) the need to separate a dog at short notice ii) dogs that are psychologically unsuited to cages, pens or confinement (in particular some large

males will pace, slather, dig or throw themselves at the wire to the point of injuring themselves but can be happily tethered).

Dogs that are tethered for these reasons need to be able to be tethered overnight in order to eliminate the possibility of chasing livestock or wildlife. Tethered dogs still need to be provided with water, shelter and a comfortable sleeping space.

1.12. Dogs less than four months old, bitches in season and bitches about to whelp must not be tethered.

No Comment

1.13. Dogs must not be tethered to a moveable object or adjacent to a fence in a manner that places them at danger of death by hanging.

No Comment

1.14. Housing must be designed, constructed, serviced and maintained in a way that:

³⁵/₁₇ provides for the good health and welfare of the dogs;

³⁵/₁₇ minimises the risks of transmission of infectious disease agents;

³⁵/₁₇ minimises the risk of injury to animals; and

³⁵/₁₇ prevents the escape of dogs.

No Comment

1.15. All potential poisons and substances that are harmful to dogs, whether in storage or in use, must be kept out of reach of dogs.

No Comment

Animal Management – Animal Care

2.1. Each weaned dog must be individually identified.

No Comment

2.2. Each unweaned pup must be individually identified such that at least the identity of its dam can be established.

No Comment

2.3. Measures must be implemented to protect dogs from distress or injury caused by other animals.

No Comment

2.4. Undesexed dogs must be housed securely such that an entire male dog does not have access to a female in season (or vice versa) unless there is an intention to breed.

No Comment

2.5. Each day, dogs must be provided with the opportunity to undertake adequate physical exercise appropriate to their breed, age and health status.

No Comment

2.6. Weaned dogs must have the opportunity to exercise for a total of at least 60 minutes each day unless the floor space in the enclosure in which they are ordinarily housed meets or exceeds the requirements in Table 3 below.

Suggested amendment

Weaned dogs must have the opportunity to exercise for a total of at least forty minutes each day unless the floor space in the enclosure in which they are ordinarily housed meets or exceeds the requirements in Table 3 below.

2.7. Provision 2.6 does not apply if:

³⁵₁₇ there is written advice from a veterinary surgeon that the dog should not undertake such exercise; or

³⁵₁₇ the person with care or charge of the dog can satisfactorily demonstrate that the dog has an injury or illness which requires the dog to be rested and the period without exercise has not exceeded 3 days.

No Comment

2.8. Dogs must not be exercised in any way that poses an unreasonable risk of serious injury. Prohibited methods include exercising a dog attached to a motor vehicle, or unsupervised exercise on a treadmill.

No Comment

Animal Management – Food and Water

3.1. Clean water must be provided to all dogs at a temperature, quantity and quality that meet the physiological needs of the dog.

No Comment

3.2. Dogs must be fed at least once daily.

No Comment

3.3. Dogs must receive a balanced and complete diet in sufficient quantity, and supplied at a frequency, that:

³⁵/₁₇ is appropriate to the dog's age, breed and physiological status; and

³⁵/₁₇ maintains a healthy body condition and, if appropriate, allows for growth and reproduction.

Suggested amendment

Dogs must receive an appropriate diet in sufficient quantity, and supplied at a frequency, that:

³⁵/₁₇ is appropriate to the dog's age, breed and physiological status; and

³⁵/₁₇ maintains a healthy body condition and, if appropriate, allows for growth and reproduction.

3.4. Puppies under four months of age must be offered a sufficient quantity of a balanced and complete diet at least three times daily, from three weeks of age. Puppies must be fed such that they are not without food for more than 12 hours.

Suggested amendment

Puppies under four months of age must be offered a sufficient quantity of an appropriate diet at least three times daily, from three weeks of age.

Puppies must be fed such that they are not without food for more than 12 hours.

3.5. Dogs that are co-housed with other animals must be monitored during feeding to ensure that each dog is able to eat sufficient food to meet their physiological needs.

No Comment

3.6. Food and water containers must be removed, cleaned and replaced immediately if noticed to be contaminated or spoiled such that the quality of the food or water is significantly affected. Contaminants that significantly affect the quality of food or water include (but are not limited to) urine, faeces and vomitus.

No Comment

3.7. Food provided to dogs must be prepared and stored hygienically and served in clean, non-spill containers that are not likely to cause injury to the dogs.

Suggested amendment

Food provided to dogs must be prepared and stored hygienically and served in clean, containers that are not likely to cause injury to the dogs.

Cleaning and disinfection

4.1. Bedding must be checked daily and maintained in a clean condition.

Suggested amendment

The sleeping area must be checked daily and maintained in a clean condition .

Rationale

the word bedding changed to sleeping area bedding is confusing and not defined, it can be a health issue for dogs that eat bedding i.e. blankets, doonas etc

4.2. All dead animals must be disposed of promptly and hygienically, and in accordance with the requirements of the local government authority, the relevant government department or other authorities.

No Comment

Transport

5.1. Dogs must be transported in a manner appropriate for their size, age and physiological status.

No Comment

5.2. Incompatible animals must be physically separated during transport to prevent injury, harm or distress.

No Comment

5.3. Dogs must be properly tethered or restrained when on the back of a moving vehicle or trailer, in a manner that prevents the dog falling, hanging off the vehicle or being injured. The only exemption to this is a dog actively being used to move livestock.

No Comment

5.4. During transport, dogs must be provided with ventilation and shade adequate to maintain good health and avoid distress.

No Comment

5.5. Dogs must not be left unattended in a vehicle if there is a possibility of heat stress occurring or in situations of extreme cold.

No Comment

5.6. All vehicles used extensively for the purpose of transporting dogs must be cleaned between consignments of dogs and appropriate measures taken to minimise the transmission of infectious disease agents.

No Comment

Health and Welfare Checks

6.1. All dogs must be inspected at least once daily to monitor their health and welfare.

No Comment

6.2. Puppies under 4 months of age, bitches in the last week of pregnancy, lactating bitches and dogs recovering from illness or injury or otherwise requiring special care must be inspected to monitor their health and welfare:

as often as is required to enable reasonable intervention to mitigate preventable risks to health and welfare; and
no less than twice daily.

No Comment

6.3. Where there is evidence that whelping has commenced (eg straining or contracting) and there is no progress within two hours, advice must be sought from a veterinary surgeon and appropriate action taken.

Suggested amendment

Where there is evidence that whelping has commenced (eg straining) and there is no progress within two hours, advice must be sought from a veterinary surgeon and appropriate action taken.

Delete Contracting

Veterinary Care

7.1. Appropriate veterinary treatment must be provided for sick or injured dogs.

No Comment

7.2. Reasonable measures must be taken to:

prevent dogs from contracting distemper, infectious canine hepatitis, parvovirus, protect dogs from common infectious diseases; and control internal and external parasites.

No Comment

Euthanasia

8.1. Euthanasia must be performed by the intravenous administration of an overdose of pentobarbitone sodium by a veterinary surgeon unless there are reasonable grounds for using another method of euthanasia, in which case, the method used must reliably induce rapid unconsciousness followed by death whilst the dog is unconscious.

No Comment

8.2. Dogs and puppies must not be intentionally killed by being drowned, poisoned or gassed with motor exhaust fumes.

No Comment

Breeding and rearing

9.1. If a litter of pups is bred, the person with care or charge of the dam at the time of whelping must provide the following information if requested by an officer or a prospective owner:

³⁵/₁₇ the name of the dam of the litter;

³⁵/₁₇ the council registration number of the dam;

³⁵/₁₇ the owner of the dam;

³⁵/₁₇ the microchip number of the dam (unless an exemption under section 15A of the *Dog Control Act 2000* applies);

³⁵/₁₇ the month and year of whelping

No Comment

9.2. Bitches under 12 months of age must not intentionally be mated during their first oestrous cycle.

Suggested amendment

Dogs under twelve months of age must not be mated as required under the Dogs Tasmania Code of Ethics. Refer Appendix B.

9.3. Bitches must not have more than two litters in any eighteen month period.

No Comment

9.4. All reasonable measures must be taken to ensure that a dog is physically and mentally fit, healthy and free of disease at the time of being mated.

No Comment

9.5. During whelping, bitches must be monitored to ensure that the birth proceeds in a normal manner.

No Comment

9.6. Whelping bitches must be provided with a suitable place to whelp lined with clean bedding. The bedding in a whelping area must be checked daily and maintained in a clean condition.

No Comment

9.7. A puppy must not be separated from its litter or lactating mother prior to weaning, except where it is in the interests of the welfare of the puppy or its mother.

No Comment

10. Transfer of Ownership Standards

10.1. With respect to the sale of puppies, the council registration number, and the name of the council where registered, of the dam of the puppy must be disclosed in any advertisement and at the point of sale.

Suggested amendment

10.1 With respect to the sale of puppies, the microchip number of the dam of the puppy must be disclosed in any advertisement and at the point of sale.

10.2. Puppies must not be rehomed prior to spontaneous weaning or before they are 6 weeks of age, whichever occurs sooner.

Suggested amendment

10.2. Puppies must not be rehomed prior to eight weeks of age.-

Rationale

10.2 Alteration to age requested due to puppies not being able to be vaccinated until six weeks of age and according to the act cannot be let go until two weeks after vaccination.

10.3. A person rehoming a dog must advise the prospective owner of the vaccination status of the dog. If advised that the dog is currently vaccinated, the prospective owner must be provided with a signed vaccination certificate that provides the following information:

the date of last vaccination;

the diseases against which the dog is vaccinated;

the date when vaccination against each disease is next due;

the name of the veterinary surgeon (if any) who was responsible for vaccinating the dog.

Suggested amendment

the name of the veterinary surgeon who was responsible for vaccinating the dog.

Additional comments and confidentiality

Do you have any additional comments on the standards or guidelines?

Click here to enter text.

Please indicate if your submission:

***contains NO material supplied in confidence and can be placed on the Department's website

contains SOME material supplied in confidence

If your submission contains some material in confidence, please outline which questions are in confidence.

Click here to enter text.