



A Voice For Dogs™

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DEFRA Post Implementation Review (PIR) of the Animal Activity Licensing Regulations

DBRG Response Relating to Dog Breeding

DBRG aims to promote human behaviour towards animals by providing and supporting initiatives to improve dog welfare related to:

- a) Genetic and breed-related health, breeding, rearing and selling practices; and
- b) To inform the general public about irresponsible dog breeding in order to make them aware of the potential impact on their dogs' health and welfare; and
- c) To advise puppy seekers on the best way to source a puppy and identify a breeder that prioritises health in their puppies

Schedule 2 General Conditions

Tiered system of health and welfare

DBRG understands the reasons for creating the different tiers of health and welfare standards initially in 2018 but would recommend the removal of these and making the Higher Standard applicable to all breeding dogs and puppies. The UK claims to have the highest standards of animal welfare in the world and has recently incorporated Animal Sentience into UK law. It seems wrong, therefore, to accept that some dogs and their puppies deserve a high standard of health and care and others get something less.

Register of Dog Breeders who fall below the three-litter threshold

DBRG recommends that all dog breeders who fall below the licensing threshold should be Registered with their local authority and be issued with a registration number. Ideally puppy seekers should be able to obtain details of dog breeders in order to approach them directly rather than buying a puppy online from a general puppy sales website. Puppy buyers would then also be able to contact the breeder if something is wrong with the puppy and if necessary be supported by the LA Animal Welfare and Licensing team. DBRG has had many

reports from puppy buyers that when their puppy is found to have a genetic disease, such as hip dysplasia or elbow dysplasia, the breeder refuses to communicate with the owner.

Schedule 6 Specific Conditions: Breeding dogs

Advertisement and sales

Licensed or Registered dog breeders who advertise their puppies for sale must include their LA Licence or Registration Number.

The sire's details as well as the mother's details must be provided for a prospective purchaser.

A prospective owner must be provided with details of all the health testing carried out on both the mother and sire. Health certificates must be supplied, containing the results.

In 1.7 please correct the spelling of 'conformation'.

6.0 Protection from pain, suffering, injury and disease

6.3 (c) No female dog used for breeding should have more than four litters in her lifetime to enable her to enjoy life after breeding as a family pet. Currently this only applies to the higher standard.

6.5 No dog may be kept for breeding if it can reasonably be expected, on the basis of its genotype, phenotype or state of health that breeding from it could have a detrimental effect on its health or welfare or the health or welfare of its offspring

The above condition must be given greater importance as the harm to dogs can be severe and long term. For example, hip and elbow dysplasia (HD and ED) or chiari-malformation (CM), can cause many years of pain and disability and dogs that should be athletic are virtual cripples. Dogs get on with life and make the most of things and never complain. It is up to the humans involved to try to prevent the suffering caused by the way that dogs are bred. The focus must be on the health and welfare of the dogs themselves of course. However, the financial and emotional cost to owners should also be taken into account. A dog is a family member, or increasingly the sole companion. When your dog is suffering its human family suffers as well and when a much-loved pet dies young it can be devastating. The Regulations Higher standards should apply to all dogs used for breeding.

Use of the BVA/KC Health Schemes and relevant DNA testing should be obligatory before breeding. Independent advice for this on a breed basis may be found on individual breed information here: <https://www.dbrg.uk/breed-health-information.html>

It should not be expected that breeders carry out all of the health tests which are available for a particular dog breed or type but a breeder should be able to explain why a particular test is unnecessary

In all cases breeders should take into account the relatedness of parent dogs by examining the pedigrees of both parents as far back as possible. Breed average COIs are useful but should be treated with caution as their calculation depends on how many generations they go back. Where Estimated Breeding Values (EBVs) are available for HD and ED, these should be used to guide breeding choices. It would be advantageous if the Kennel Club used health testing information to provide EBVs for other common genetic diseases as a matter of urgency.

April 2020 Guidance Notes for Conditions for Breeding Dogs

The above Guidance provides measures for the Higher standards and we reiterate that these standards should be applied to all Licensed and Registered breeders. Currently the higher standard breeders will be very much in the minority which means that the vast majority of breeding dogs and their puppies do not have such protection. The UK Animal Sentience law does not suggest that only a minority of dogs deserve such protection. Recent developments and the prices commanded for puppies suggest that dog breeding is increasingly being carried out by those who look only for profit and who do not care about the health and welfare of dogs used for breeding or their offspring. This makes further protective measures even more important.

Genetic health in dogs

The Guidance Notes do not emphasise in-breeding and genetic health enough and we recommend that this aspect is given much greater prominence. In terms of numbers of dogs (and owners) affected, these health and welfare issues cause more harm to more dogs than any other issue.

Human preferences for extreme and unhealthy shapes and sizes of dogs have resulted in more suffering and shorter lifespans. Unnaturally large dogs breeds generally have a shorter lifespan and are prone to orthopaedic problems and early onset cancers. Extremely small sized dogs have fragile bones which are easily broken, dental problems, problems related to their skull size and shape, and eye problems due to rounder, forward facing eyes. The plasticity of the canine species has been driven by human desire to unacceptable levels with severe consequences for the dogs concerned.

Respect for dogs

We humans - those who draft and enact legislation, those who breed dogs, those who use dogs and own them as pets should have respect for them. We feel that the term 'respect' must become part of any Regulations that affect dogs and that outdated terms such as 'breeding stock' or 'breeding bitch' should be replaced.

Ensuring the health, welfare and respect of sentient animals is important as a measure of social progress and civilisation.

The issue of home ('hobby') breeders

Much lobbying has been carried out by those breeders who fall below the licensing threshold – the self-styled 'hobby breeders' to be left alone. However, DBRG believes that all dog breeders should be regulated in the best interests of animal welfare and the protection of breeding dogs and their offspring. Of concern is the temptation to over-use a particular breeding female and make use of unsuitable outdoor accommodation where puppies may not be closely monitored or given adequate socialisation. Just as with some commercial breeders, profit may be the chief motivation. As mentioned previously, we think that these breeders should be registered with the local authority and subject to inspection and control. Without the knowledge of breed-related genetic health and the use of health screening/testing many dogs and their owners will face future problems.

If the protection of animals is the aim, then it does not make sense to allow the largest group of dog breeders to avoid health and welfare scrutiny.

The argument that the demand for puppies has to be fulfilled cannot be justified. This is the language of commerce and we need to cease thinking of dogs as commodities. We need to think about a dog's right to be protected by the law. Not just some, but all of them.

Under this system compassionate and ethical dog breeders should have nothing to fear from being regulated.

A national system of microchipping

Although out of scope for this consultation, microchipping plays an essential part in the protection of dogs from exploitation and poor welfare. Ideally there should be one central microchipping database but if this is not possible then there needs to be a reduction of the number of databases, standardisation of the microchipping requirements, and connections between databases. For accountability and safeguarding, the breeder's details, including the license or registration number should be retained on the microchip database.

Enforcement of the Regulations

There are serious issues with the enforcement of the Regulations for Dog Breeding with a very patchy picture across the country. It falls to Local Authorities to grant licenses and enforce the Regulations. Also, to investigate those who are breeding dogs illegally. A major issue is the absence of ring-fenced funding to develop this 'new' responsibility. A basic training course is now available and this needs to be rolled out nationally. Those whose job it is to inspect dog breed establishments and grant licenses should have a specific role for animal welfare and the relevant training and expertise. Every local authority should have access to Dedicated Animal Welfare Officers to enforce the Regulations.

There needs to be a consistent approach and high standards of animal welfare knowledge and expertise on the part of LA Inspectors. There should be a requirement for Dedicated Animal Welfare Officers Specific training for vets who inspect breeding establishments is essential for consistency and thoroughness.

Training for Local Authority Inspectors

DBRG is currently working on providing a Training Module for Local Authority Inspectors to include genetic health. DBRG has already provided via its website Breed Posters, containing information and advice for pet owners about specific dog breeds and dog types:

<https://www.dbrg.uk/breed-health-information.html> These would also be helpful to LA Inspectors.

References

- 1) *CFSG/DBRG Code of Practice for Dog Breeding 2021*, CFSG/DBRG
- 2) *CFSG Guidance on Dog Conformation 2020*
- 3) *European Convention on the Treatment of Pet Animals 1987*
- 4) *Animal Welfare in England: domestic pets* House of Commons Environments, Food and Rural Affairs Committee *Third Report of Session 2016-17 Recommendations*
- 5) *Welfare in Pet Trade Report Responsible Dog Breeding Guidelines 2018(?)*
- 6) Finnish Food Authority Report 2020 *Improving the implementation of animal welfare legislation in animal breeding*
- 7) *Review of the Animal Welfare (Breeding of Dogs) (Wales) Regulations 2014*, A report of recommendations to the Welsh Government by the Wales Animal Health and Welfare Framework Group December 2019
- 8) CARIAD *A Guide to the Socialisation of Puppies 2014*
- 9) Scottish SPCA Assured Puppy Breeders Scheme 2020
- 10) Companion Animal Welfare Council (CAWC) Report *Breeding and Welfare in Companion Animals 2005*
- 11) BBC documentary *Pedigree Dogs Exposed 2008*
- 12) *Pedigree Dog Breeding in the UK: A major welfare concern* RSPCA Dr Nicola Rooney, Dr David Sargan
- 13) *A Healthier Future for Pedigree Dogs* APGAW 2009
- 14) *Independent Inquiry into Dog Breeding Report 2010* Sir Patrick Bateson
- 15) APGAW *A Healthier Future for Pedigree Dogs – Update Report 2012*
- 16) Centre for Animals and Social Justice (CASJ) *Animal Protection Commission – A Policy Proposal 2014*
- 17) APGAW Sub-Group for Dogs *Review and Recommendations for Developing and Effective England-wide Strategy for Dogs 2014*
- 18) Advisory Council on the Welfare Issues of Dog Breeding Report 2014 *Summary of Progress Since the Bateson Report of 2010*
- 19) RSPCA Report *Sold a Pup 2016*
- 20) EFRA Committee Report *Animal Welfare in England: Domestic Pets Third Report of Session 2016-17*
- 21) Blue Cross Report *Unpicking the Knots 2016*
- 22) The Kennel Club *Breed Health and Improvement Strategy: A step by step guide 2018*
- 23) DBRG Report *The Animal Welfare Act and the Protection of Offspring 2018*

All of the above reports may be found here: <https://www.dbrg.uk/welfare-reports.html>