



**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: forwarded to the Canine and Feline Sector Group (CFSG) )

#### Business test

We understand there are problems around applying the business test to dog breeders, especially to those breeders who are breeding below the licensing threshold of three litters per year. Given the rising cost of puppies, this needs to be applied to breeders below the licensing threshold as in terms of income and profit the business test would apply. For example one litter of six puppies sold for £1500 each earns the breeder £4000. Many breeders would not need to advertise their puppies for sale, given the established networking among breeders and word of mouth regarding litters due to be born and waiting lists of puppy buyers. It would be a simpler process if it was assumed that a dog breeder was running a business. Then it would be up to the breeder to prove that they were not.

#### Appointment of a vet for inspections

This is a crucial role in ensuring that the health and care of breeding dogs and their offspring is appropriate. The inspecting vet must not be the breeder's own vet as this would be a conflict of interest. Inspecting a breeder's premises and facilities is a specific role and not the same as a vet's day to day work. Ideally vets should have specific training for this role. A team of vets who specialise in the inspection of a breeder's premises could be set up so that consistent standards apply across the country. Expertise in the problems linked to poor

conformation, breed-specific and other inherited health problems and diseases is essential for the role of the inspecting vet. Expertise in the health screening schemes and DNA tests which are available should be required for this role. How closely related parent dogs are should also be part of the inspecting vet's knowledge and with this the advice given to breeders to avoid breeding from close relatives. Genetic diversity must be promoted by a suitably qualified inspecting vet.

## Licensing requirements

UK law now recognises Animal Sentience and scientific research recognises the importance and value of dogs to their human owners as companions. A law which allows different standards to apply to dog breeding discriminates against the breeding dogs and offspring at licensed premises which are below those operating at the Higher Standard. DBRG would like to see the criteria for the Higher Standard breeding establishment to apply to them all so that all dogs enjoy excellent health and welfare. We think that applying one standard would also make it easier for LA inspectors and veterinary inspectors.

## Part B – Specific conditions: breeding dogs (schedule 6 of the regulations)

1.7 The breeder must give all details of the sire to the buyer, including the health testing which has been carried out and the certificates showing the results. This should not just be for the higher standard and would ensure that all puppies bred are at reduced risk of genetic diseases and harmful physical traits. Allowing the breeding of dogs where only the mother is subject to health screening will not improve dog health and welfare. The health screening of the sire is even more important than that of the dam because he is likely to have more progeny. The over use in breeding of certain male dogs has been a major contributing factor in the poor health of dogs.

### 6.0 Protection from pain, suffering, injury and disease

6.3 On the basis of protecting the health and welfare of dogs and ensuring that female breeding dogs can go on to enjoy life as a pet, a maximum of four litters should be applied for all (rather than only for the higher standards). As above, this would make the role of LA inspectors clearer and easier. It would also be an acknowledgement of animal sentience and equality for the dogs used for breeding.

6.4 To provide traceability, the breeder's details must be retained on the microchip database. Best practice and the improved genetic health of dogs is when a breeder is responsible for the puppies they produce throughout the adult dog's life. A breeder should

be aware of the age at which their dogs die and what they die of. This would inform their future breeding.

**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 and welfare of its offspring**

Clarification is needed on 'can reasonably be expected.' We suggest omitting this phrase altogether so that there is no ambiguity.

Note: language and terminology should be changed to reflect animal sentience and modern times. 'Bitch' to be replaced by 'breeding female.' Dogs used for breeding should not be referred to as 'stock' to reflect the role dogs play as human companions and to encourage breeders to treat their dogs with respect.

As above and to reflect animal sentience and modern times, dogs used for breeding should not be subject to different standards of care. Scientifically validated health screening and DNA tests for a breed or crossbreed should be used prior to selection. If the test results indicate a risk to the health of the offspring those dogs should not be used for breeding.

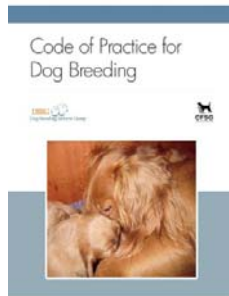
The Coefficient of Inbreeding limit of 12.5% must apply to all breeding dogs, not just the higher standard ones.

6.7 The higher standard should be applied to all and every puppy should be checked by a veterinarian and the relevant paper work be available to the puppy buyer.

6.8 A puppy contract should be used as a requirement of all breeders. The **AWF Puppy Contract** is a universal puppy contract for the benefit and protection of the new owner and the breeder.



All breeders should use the CFSG/DBRG **Code of Practice for Dog Breeding**



### **Dog Breeding Qualification**

An OFQUAL qualification for dog breeding should be developed and encouraged with a view to it becoming a requirement before anyone embarks on the responsible career path of dog breeding

### **Star based licensing system**

DBRG understands the reasoning behind awarding dog breeders a licence based on a graded system and the incentive to do better. However, if the UK is to uphold the principle of Animal Sentience and to claim that it has the highest standards of Animal Welfare in the world, it should not discriminate where companion animals are concerned. Every puppy deserves the best start in life and every dog used for breeding - female and male – deserves the best standards of health, welfare, care and compassion.

### **Further points on licensing and inspection**

A combined system of LA licensing (above 2 breeding females) and registration (1 or 2 breeding females) should be introduced. This would identify all dog breeders, raise standards of health and welfare and help puppy buyers make good choices.

All dog breeding establishments should be inspected annually so that good standards are consistent and maintained.

Kennel Club Assured Breeders should not be exempt from any of the above. They should be part of the national system and subject to the same regulations.

All of the above suggestions would ensure more clarity and consistency for LA inspectors.

They would also help to ensure good care for all dogs used for breeding and their offspring.

Adequate resources and training must be given to local authority inspectors to enable them to carry out this important role professionally and appropriately.

A standardisation of licence fees (and registration fees for those breeders below the licencing threshold) would enable more inspectors to be appointed and trained

Animal welfare should be distinct from other licensing activities. It should be a specialised role with adequate training in animal welfare especially dog health and welfare.

There should be national standardisation of roles and methods. Often there are major discrepancies between the levels of expertise of enforcing officials from different local authorities (even in the same area).

Better collaboration between neighbouring enforcement agencies is needed. This could involve one team that specialises in animal activities licensing work across several local authorities. As well as encouraging consistency of standards and issues of training and expertise, the issue of resources could also be addressed.

Specialised training for local authority dog breeding establishments is essential and national standards applied. The current City and Guilds course is an excellent initiative and should be rolled out nationally.

Note that DBRG is currently working on the provision of a Training Course for Local Authority Inspectors in Breed-related Health. It already provides guidance for local authority inspectors in the form of its Breed Health Information Posters: <https://www.dbrg.uk/breed-health-information.html>

### **Movement of breeding females**

An important loophole must be addressed. The movement of breeding females between breeding establishments in order to avoid the licensing threshold, and to avoid the limits on litters for each breeding female. These practices can result in serious welfare breaches.

**Microchipping** – there are important concerns about the current system which must be addressed. DBRG has submitted a response to the Microchipping consultation.

