

# The Dog Breeding Reform Group (DBRG) Response to Welsh Government Dog Breeding Licensing Conditions Consultation

September 2021

## Introduction

Members of DBRG comprise veterinary scientists, dog owners, canine behaviourists, practising vets, dog welfare experts, legal experts, and spokesperson for breeders. We are a Charitable Incorporated Organisation (COI) (No.1195705) whose function is to improve the health and welfare of dogs relating to breeding and selling practices, including inherited and breed-related health. We provide information for puppy buyers when they are searching for an ethical breeder. We provide advice on breed-specific health issues, including those associated with unnatural conformation (body size and shape). We provide advice on health test certification and the dangers of inbreeding. We regard dogs as sentient beings worthy of the best possible care by those who breed them and their future owners. We acknowledge the enormous value and significance to humans of dog ownership.

<https://www.dbrg.uk/>

DBRG agrees that the Welsh Government's proposed changes will deliver some improvements to the licensing framework for dog breeders in Wales, but the proposed changes do not go far enough to tackle known issues with licensed dog breeding in Wales. There are many aspects of the licensing regime which still require addressing and improving. We are concerned that a considerable number of recommendations of the Wales Animal Health and Welfare Framework Group 2019 Report remain overlooked. The WAHWFG produced a long overdue and thorough report and recommendations for the improvement of dog welfare related to breeding practices. DBRG members welcomed this report which signalled a break from the past and expected the Welsh Government to welcome it and put its recommendations into practice. Sadly, this appears not to be the case.

## **Consultation questions**

We find the Consultation questions limited on the whole to the physical environment in which dogs are bred and concentrates almost entirely on licensed breeding premises. The majority of dog breeders in Wales are unlicensed and this is a huge oversight.

### **1. Does the Guidance provide sufficient information to address the various situations and premises dogs are bred in? E.g. Small scale home environment and larger scale commercial breeding premises.**

The guidance has a clear focus on large scale breeding operations, therefore our answer to this questions is, No.

Clearly it is important that there is nothing dangerous or uncomfortable in the construction of dog kennels, and essential that cleaning and hygiene regimes are to the highest standard. The wording is applicable to smaller scale breeders whose dogs are housed in kennels but not to those who typically breed inside the home.

Considering that those inspecting on behalf of the local authorities are required to apply the principles of the guidance to home breeding environment, this increases the prospects of variation in the implementation of licensing conditions. This may result in negative implications for animal welfare in breeding establishments, and ambiguity about what constitutes good welfare in home breeding environments.

The Framework Group's recommendations should be incorporated to provide further detail and information that would be useful on a practical level for any inspector when inspecting a domestic environment.

In contrast the guidance for local authorities in England (regarding the Animal Welfare (Activities Involving Animals) (England) 2018 regulations) provides specific guidance for both kennel and home environments -

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/936830/dog-breeding-guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/936830/dog-breeding-guidance.pdf)

## **2. Does the additional advice relating to the setting of staff to adult dog ratios make it clear that the inspecting officers should consider this on a case by case basis?**

DBRG accepts that the guidance is now clearer that the staff to adult dog ratio should be assessed on a case by case basis. However, we do not believe the new wording is sufficient to fully address the problems.

There is considerable flexibility within the legal maximum adult dog to staff ratio, 20 adult dogs could for example comprise 10 breeding bitches and 10 stud dogs, or 20 breeding bitches. If those breeding bitches each had a single litter of five puppies a year, a full-time staff member in the first example would be in charge of 20 adult dogs and 50 puppies over the course of the year. In the second example the staff member would be in charge of 20 adult dogs and 100 puppies over the course of the year.

Theoretically speaking if the litters were equally spread out throughout the year, in the first example the staff member would be looking after around 2 litters of puppies at any given time, in the second example they would have four litters alongside the adult dogs at any given time.

Variation in litter sizes between different breeds and crosses would result in larger discrepancies.

The staff to adult dog ratio is a crude tool. It is therefore essential that inspectors focus on the welfare outcomes for the dogs and puppies at the licensed establishments. Licenced breeders must be required to demonstrate to inspectors that they are able to meet the welfare needs for both the adult dogs and number of expected puppies on the premises.

It must be made clear that health and welfare needs are met seven days per week, all year round. Licensing authorities should give careful consideration to the number of puppies that the licence holder is authorised to have on the premises at any given time, in addition to the number of adult dogs. Licensing authorities should consider staffing levels both with regard to the *number* of staff and also their *experience and skill levels*, taking into account how this provision will be maintained over the full seven-day week.

### **3. Do you agree that the role of the private veterinary surgeon, and that of the inspecting veterinary surgeon, should be clearly separated and defined, and that inspecting vets should be independent and should not inspect their own clients' premises?**

We agree that this is essential. A breeder's veterinary surgeon should not be involved in the inspection. This needs to be expanded to ensure that vets from the same veterinary practice group do not inspect that breeder's premises. The inspecting vet must be appropriately independent of the breeding establishment. There is the additional issue of the appropriate training of vets for the role of inspecting dog breeding premises. Specific training must be provided and required for all inspecting vets. This must include training in inherited health, including serious conformation (body size and shape) health and welfare issues and knowledge of the appropriate health testing and certification requirements. For example, the BVA/KC Canine Health Schemes and their required certification: <https://www.bva.co.uk/canine-health-schemes/> Use by breeders of the Code of Practice for Dog Breeding: <https://www.dbrg.uk/code-of-practice-for-dog-breeding.html> and AWF Puppy Contract: <https://www.animalwelfarefoundation.org.uk/animal-welfare-advice/puppy-contract/>

### **4. Future amendments to enclosure sizes**

We note that the Welsh Government will establish a separate working group to review enclosure sizes and recommend that CAWGW is involved in this working group.

### **Concluding comments**

DBRG members welcome the Welsh Government taking action in relation to the licensing regime for dog breeders in Wales. However, as previously stated, we feel strongly that the proposed changes are not sufficient to deliver the improvements in dog welfare and well-being that are needed. DBRG note that the questions in this consultation are limited to the proposed amendments to the Guidance document. Whilst these are welcome, there are major ways in which the Guidance could be improved to provide further clarity to local authorities and licence holders. More importantly the Welsh Government must enact and enforce the long overdue improvements in dog health and welfare in Welsh breeding establishments.

DBRG is at a loss to understand why the Welsh Government does not concur with the Wales Animal Health and Welfare Framework Group's (WAHWFG) 2019 Report and use it as the basis of legislative change and the much needed improvement in dog health and welfare related to breeding practices.

### **Inherited health and welfare issues in dogs**

As in England and in the rest of the United Kingdom, DBRG would like to emphasise that even with the best environment, facilities, enrichment and human interaction for breeding dogs and their puppies, it counts for little if those dogs used for breeding are passing on harmful features and genetic diseases. These can cost pain and suffering for the dogs and much heartache and distress for owners. We would add research has shown that this health and welfare issue is on a scale that is still not acknowledged by UK governments and dog breeding governing bodies.

The Animal Welfare Act 2006, includes, Protection from pain, suffering, injury and disease.

The Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018 explicitly states: *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 that of its offspring.*

DBRG expects that, Protection from pain, suffering, injury and disease, is applied consistently throughout the United Kingdom and that the explicit, additional clarification in the 2018 English Regulations is endorsed by all the devolved administrations. In this way, we can begin to address these serious health and welfare issues and breed dogs which will have a long and active life.

We look forward to a continuing dialogue with the Welsh Government with regard to dog breeding in Wales.