

Policy Position: An independent committee to provide expert advice on companion animal welfare, with particular reference to the protection of dog welfare

Introduction

This paper presents an argument for the setting up of an independent committee to provide expert advice to Government on companion animal welfare. The paper proposes that the valuable role provided by the Farm Animal Welfare Committee (FAWC) for the protection of farm animals should be emulated with a parallel body to help protect the many millions of companion animals which are kept. It is argued that there is a particular need for advice which is independent of stakeholder interest, rigorously evidence-based and authoritative. No suitable mechanism at the moment exists to fulfil this function. The paper highlights the very important role that companion animals play in citizens' lives, the many services they provide to society, and the costs to society arising from health and welfare harms to them.

While the argument proposed is for an advisory body for all companion animals, illustrations of the benefits for protection of the welfare of dogs are mostly used here, reflecting the particular focus of the Dog Breeding Reform Group (DBRG).

A brief history (with particular reference to dog breeding)

A body fulfilling a similar role to that we recommend operated as the 'Companion Animal Welfare Council (CAWC)' from 1999, but ceased active functioning from 2009. It was supported by charitable donation and, for three years, grant-funding from DEFRA. Its scope included provision of advice to Government on the welfare of companion animals with publication of its findings, and assessing and making recommendations on relevant legislation. Its working methods specifically included making available information and research data which it has obtained, in order to enable Parliamentary legislation on companion animal welfare issues to be drafted

and debated. During its term the CAWC published a number of valuable reports and opinions including, the assessment of companion animal welfare, animal welfare surveillance, regulation of training and behaviour modification services, welfare of non-domesticated animals, and the identification and registration of companion animals.

The CAWC also considered the question of how to tackle genetically-based welfare problems in companion animals. In 2006, for example, it published, 'The breeding and welfare of companion animals', examining the scientific and technical issues that bear on prevention of inherited disease. Its recommendations were particularly relevant to dogs and included that urgent measures be taken to address the problems of in-breeding and breed-related poor health and welfare. The report presaged concern over the consequences of breeding practices for pedigree dogs, reflected in a high profile BBC documentary 'Pedigree dogs exposed' aired in 2008, and a series of related reports including the 2010 'Independent inquiry into dog breeding', led by Professor Sir Patrick Bateson.

The 'Bateson Report' itself recommended the setting up of an Advisory Council on Dog Breeding, which subsequently occurred, to provide independent, expert advice to Government. The Advisory Council operated between 2010 and 2014 but, as with the predecessor CAWC, now no longer functions. In the absence of the CAWC and the Advisory Council there is now no formal mechanism for the commissioning or provision of expert advice on companion animal welfare in which the Government, parliamentarians and the public may have confidence. The lack of such a mechanism may be anticipated to hinder potential progress nationally on companion animal welfare.

Current context

National level responsibility for the welfare of companion animals at the moment lies with 'sector' groups, such as the Canine and Feline Sector Group (CFSG) and the Equine Sector Council (ESC). CFSG, for example, comprises representatives from welfare bodies including the RSPCA, Dogs Trust and Blue Cross, the veterinary associations, and industry bodies, including the Kennel Club (KC), and the Pet Food Manufacturers Association (PfMA).

Sector bodies have the potential to 'feed into' Government decision-making particularly via the Animal Health and Welfare Board for England (AHWBE) which was set up by Government in 2011. The Board comprises Members from DEFRA including senior veterinary officers, and non-executive members currently drawn substantially from industry bodies. *Note: there is a parallel body in Wales, the Animal Health and Welfare Framework Group (WAHWFG).*

With respect to mechanisms available within Parliament to progress animal welfare, interested M.P.s may join the All-Party Parliamentary Group for Animal Welfare (APGAW). APGAW provides a mechanism by which parliamentarians may debate issues that concern companion animal welfare, and on matters of concern produce reports for consideration including by Government. APGAW's stated purposes include, *'to promote and further the cause of animal welfare by all means available to parliaments'* and *'use the influence of politicians and experts to raise the welfare of animals nationally and internationally.'* APGAW does not comprise an 'expert' body, but is able to draw on a wide-range of input including that from its broader membership of affiliated organisations. APGAW has recently undertaken some changes in its approach with the setting up of an 'Advisory Panel' of industry, welfare and sector bodies with a view to enhancing its effectiveness.

Advice and information is also available through the activities and reports of third-sector welfare organisations, which often have a high level of expertise and close familiarity with particular health and welfare problems and the causes of these. Evidence-based reports provided by such organisations are often of high quality. Such reports are produced on significant welfare issues by, for example, the RSPCA, the Dog's Trust, the Kennel Club (KC), the National Equine Welfare Council (NEWC), World Horse Welfare (WHW), the British Horse Society (BHS), Cat's Protection, as well as bodies with specialist interest in birds, reptiles, amphibians and primates. Additional evidence may be available through the work of organisations operating at a European or international level, such as that produced by Eurogroup for Animals and the European Dog and Cat Alliance, and the World Organisation for Animal Health (OIE). Such sources would be available to an independent body charged with reviewing available evidence and making recommendations to Government.

The role and benefits of companion animals (particularly dogs) in the 21st century

Companion animals play a vital part in society in improving and enriching the lives of people.

The population of dogs in the UK, in particular, is variously estimated at between 8.5 and 11.6 million^{e.g.1,2,3}. A primary benefit of keeping a dog today is in their role as a companion and family member, with traditional functions, such as herding and hunting, playing a much less significant role. A dog may provide companionship and a reason to exercise and socialise, perhaps particularly for those living alone. Owning a dog has been shown to contribute to a range of beneficial health outcomes including relief of depression and anxiety, with ownership also associated with lower blood pressure^{e.g.4,5,6}. Mental and physical health benefits have been reported also, for relationships people have with cats and other companion species¹¹. These benefits would be anticipated to lead to reduced national health service demands¹⁰, with

savings to the NHS in the UK through pet ownership estimated in 2016 to be up to £2.45 billion per annum^{12,10}.

In more specific areas, owning a dog has been observed, for example, to benefit children who suffer from autism⁸ and ADHD⁹. Such benefits have also been reported for contact with 'Pets as Therapy' dogs in contexts such as old people's homes and hospices⁷. Such benefits are in addition to the role of guide dogs for the blind, hearing dogs for the deaf, and other assistance dogs, as well as that of drug detection dogs, police dogs and further specialist roles¹⁰. Medical detection dogs are a quite recent development, where the ability of dogs to detect scent means that they can be trained to detect the early stages of cancer, epileptic seizures and diabetic comas. It is suggested that the potential of dogs in medical detection will continue to grow¹⁰.

Besides the potential benefits to human health, companion animals have a significant impact on the UK economy through the associated industries which cater for companion animal needs and enrichment, as well as through the provision of veterinary services¹⁰. Expenditure on pet food and other products for pets has been estimated to exceed £4.6 billion pa¹³, while that on veterinary costs is estimated to be over £3.5 billion pa in the U.K.¹⁴ For dogs as an example, costs arising for society as a result often of poor care, lack of knowledge, inadequate breeding practices and irresponsible ownership, include those of abandonment and impounding (estimated at over £40 million pa)¹⁵, costs to police authorities of impounding dogs under the Dangerous Dogs Act (estimated at over £5 million pa)¹⁶, health service costs arising from dog bites (estimated at up to £10 million pa¹⁰), costs imposed on rescue organisations (estimated in 2010 at £340 million pa)¹⁷, and those unquantified but likely substantial amounts to owners arising through veterinary costs consequent on poor breeding practices. Health risks too may be created through pet ownership, for example, through potential transmission of zoonoses, which require to be evaluated and addressed¹⁸. Pet insurance is a market worth £1 billion pa, and can represent a significant component of family expenditure¹⁹.

To fulfil the many roles and expectations of dogs in particular, and companion animals more generally, policy needs to be developed that will protect their health and welfare, respond to problems created by lack of knowledge and poor or irresponsible care, and reduce societal costs arising from these. Development of such policy depends on relevant high quality research, rigorous evaluation of options, and informed and realistic recommendations.

Issues

The national level framework now applying to the health and welfare of farm animals includes executive responsibility by Government through DEFRA to develop and apply regulation, and high level policy advice and mediation with industry operators through the AHWBE. This is informed by input from, amongst others, farming unions and farm species industry sector bodies. Additional to this is the availability of reports and opinions from the FAWC, an independent committee with the expertise to appraise scientific and other evidence to provide evidence-based recommendations. The FAWC operates within an agreed work plan with DEFRA.

The current model for farm animals has merits. It may enable more effective engagement with industry to achieve change. The role of the FAWC is though a particularly valuable component by virtue of its relative independence and evidence-focus. It also has an authority built historically on provision of high quality, objective reports. The role of the FAWC meets a need to provide objective advice, and to counter, with evidence, positions that may be adopted as a result of pressure by industry interests. Such interests may seek to downplay the relative importance of welfare considerations.

Where industry as a 'stakeholder' is provided with privileged access to policy-formation this has the potential to distort policy outcomes away from what is appropriate from an animal welfare perspective, and the expectations of the wider public. It is important that animal welfare is recognised as a public good, and that policy decisions are informed in a way that reflects this. FAWC reports are able to provide input which can inform not only Government decision directly, but be used by advisory bodies (such as the AHWBE), as well as having an independent status which enables them to be legitimately used as argument by third-sector and campaigning bodies.

The corresponding model for companion animals currently lacks this necessary balance and authoritative evidence-based support. While the framework also includes executive responsibility by a Government department (DEFRA), with advice and potential industry mediation through the AHWBE, and two-way communication between the AHWBE and industry or welfare organisations through the CFSG and other bodies, decision-making at each of these levels runs significant risk of

distortion away from companion animal welfare priorities and addressing public concern. This reflects the extent to which industry is represented as stakeholders within both the AHWBE and sector bodies such as the CFSG, and a mode of decision-making whereby industry concerns can qualify welfare-based initiatives. The processes of selection of representatives for these intermediate level bodies has not been transparent or impartial which, in the absence of recognised independent advice, undermines the democratic legitimacy of the decision-making framework as a whole.

As a side-note, there should be the separate opportunity for citizens through their parliamentary representatives (M.P.s) to be able to influence the issues that are considered by Parliament. All-Party Groups provide a means by which citizens concerns can gain expression on matters of specific interest, such as animal welfare. It is of concern that the All-Party Group for Animal Welfare (APGAW) has recently decided to look to an 'Advisory Panel' to input and comment on proposals, with the role of its previous broader associate membership now relegated. The Advisory Panel includes amongst others the NFU, the Petfood Manufacturers Association (PFMA) and the Pet Industry Federation (PIF). These bodies, for example, have vested interests in animal use, and do not comprise independent welfare experts.

It appears that each of the major mechanisms for influencing Government policy offers potentially unaccountable influence by bodies with vested interests that may conflict with policy in the best interests of animal welfare. The structure and membership, as well as the processes of each should be reviewed to minimise this potential. Critical, however, is that a 'third-person' perspective that has credibility may be appealed to which can support challenge to decisions made in each of these forums which have the potential to be unduly influenced by industry agendas. An independent advisory body for companion animal welfare, operating to an agreed work plan with DEFRA, and with membership determined according to Nolan Principles can play this role to achieve a more balanced and accountable framework.

DBRG Position

DBRG recognises the valuable role of the Canine and Feline Sector Group (CFSG) with respect to discussing important health and welfare issues by a wide cross-section of welfare and industry bodies. It has shown it can contribute to highlighting welfare issues to Government and to facilitate action through its member organisations such that welfare policy can be more effectively communicated and effected. It has had a

useful role to play, for example, in updating the current Code of Practice for the Welfare of Dogs, and contributing to the recent review of animal licensing by Government.

However, it is of concern that as an advisory body its members are not truly independent as outlined above, and that members may wish to promote their own agendas, affecting priorities considered and the approach taken to these. We are concerned, for example, that the problems related to dog breeding and the genetic health of offspring appears to date, without justification, not to be regarded as a priority in spite of it affecting many thousands of animals, often with adverse welfare consequences throughout their lives.

DBRG has concern also about the import of the re-structuring of APGAW and its new emphasis on industry engagement. However, the changes may bring about greater efficiency and willingness on the part of Government to listen to its recommendations. There appears though to be the potential to undermine the role that such an All-Party Group plays in enabling citizen's voices through their M.P.s to be heard on a matter of particular concern, in favour of influence by corporate bodies. More importantly, there appears to be the potential for the parliamentary agenda on animal welfare to be unduly influenced in some instances by those who may be least concerned to advance it significantly, or to consider the welfare needs objectively.

Moreover, the composition of the Animal Health and Welfare Board for England (AHWBE) has a high industry sector bias. It includes as non-executive Members three senior farming industry executives and a senior member of the Country Landowners Association (CLA). While there are currently two Members who focus on companion animal welfare matters, the experience of one has been substantially in the context of commercial use of 'companion' animals in sport and entertainment. Importantly, the non-executive membership is substantially not one with extensive, scientifically-based welfare expertise.

In the context of the above concerns, in light of the valuable role that the FAWC has performed in advancing farm animal welfare as a model, and given the need within an integrated framework of decision-making for authoritative, independent, evidence-based advice, DBRG strongly supports establishment of an expert body of the kind that the CAWC was intended to undertake and with a role in relation to Government parallel to that of the FAWC.

Recommendations

- An independent Council or Committee be set up (or re-formed) to provide advice to Government on the welfare of companion animals based on rigorous review of available evidence.
- The membership and running of the Council/Committee to be carried out according to Nolan principles.
- Membership to comprise scientific and welfare experts.
- A secretariat be provided by DEFRA.
- Ideally, funding to be provided by DEFRA (as it currently does in part for FAWC) with matched funding sought from stakeholders in the companion animal sector.
- If DEFRA funding is not possible in the current economic climate, then funding should be sought from the sector in a way that allows the Council to operate independently.

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