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Neil Parish, MP  
Chairman  
Environment, Food and Rural Affairs Committee  
House of Commons

Dear Neil

**EFRA COMMITTEE REPORT ANIMAL WELFARE IN ENGLAND: DOMESTIC PETS**

On behalf of the Dog Breeding Reform Group (DBRG) I would like to respond to the recently published *Efra Committee Report on Animal Welfare in England: domestic pets*

First, I would like to say that DBRG is delighted that the Committee has recommended a timetable be set for secondary legislation under the Animal Welfare Act 2006. We feel that this is very much overdue and desperately needed.

With reference to dogs, DBRG is also delighted that the Committee recommends regulations to protect the genetic viability and welfare of offspring as well as adult dogs. We are also grateful for the recommendation that anyone breeding two litters of dogs per year should be licensed as a breeder. We fully support the recommendation that all breeders falling below the licensing threshold should be registered with a local authority and allocated a registration number. Registration would ensure that the breeder of those puppies is the seller and not a third party. An emphasis on the social development of puppies is also very welcome as this is an area previously ignored by licensing authorities and much needed in the light of modern research.

The idea of a national inspectorate for licensed dog breeders would address some of the practical problems of the current system which relies on local authority staff, some of whom do not have the required expertise in the area of animal welfare. It would also address the problems of differences of scale of dog breeding activities between local authorities.

We are delighted that banning the third party selling of dogs (barring approved rehoming organisations) is one of the Committee's recommendations. This measure alone would dramatically improve dog welfare and acknowledges that dogs are not mere commodities to be traded.

The recommendation that the Pet Advertising Advisory Group's minimum standards should be extended to all websites is welcome although we would argue that those minimum standards do not go far enough. Also, given the scale of the business and number of websites involved, more staff are needed for the process to be effective. The Report recommends the inclusion of local authority

registration or licence numbers on all internet advertisements and we wholeheartedly concur with this.

DBRG welcomes the recommendation that a statutory duty be placed on local authorities to enforce the Animal Welfare Act, with funding from central government. We also agree that maximum penalties for breaches of the Animal Welfare Act should be increased to five years and that an animal abuse register should be kept. We would recommend that such a register is made available to the general public via the Defra website.

We also strongly support the view that there should not be a local authority exemption for UKAS accredited businesses, though we recognise that UKAS accreditation to appropriate standards may inform a risk-based approach to licensing by local authorities.

While DBRG focuses on dog welfare, we note that the Select Committee Inquiry purported to cover the welfare of domestic pets in England more generally and we are concerned that other domestic pets such as horses, cats, reptiles, amphibians and birds have not been given much attention. There is substantial evidence of significant welfare issues for these groups.

We come to the recommendation that the RSPCA should withdraw from acting as a prosecutor of first resort for animal welfare breaches. DBRG's view is that the burden of animal welfare prosecutions should not rest entirely with the RSPCA. However, if it was to step back from the area of prosecutions and we rely on the CPS, many cases of animal welfare abuse would be left unprosecuted. There is also the issue of who would care for the animals seized during the prosecution process. It would, in our view, be unreasonable to expect the RSPCA to bear the cost of their care when their ability to enforce the law has been otherwise limited. We also believe that the overall standard of animal welfare in England would drop as a result. Currently the RSPCA do an expert job based on decades of experience and expertise and a few isolated cases where they have been criticised for being 'heavy-handed' should not detract from that. It is the view of DBRG that far too many cases of animal welfare breaches remain unpunished currently and to limit the power of the RSPCA from carrying out its work would be a retrograde step.

DBRG feels that the RSPCA issue in the Report detracts from what is otherwise an excellent set of recommendations to improve the protection and welfare of dogs.

Yours sincerely

Carol Fowler (DBRG Chairman)