

Dog Breeding Establishments Guidance for Local Authorities

Consultation response form

Your name: British Veterinary Association (BVA)

Organisation (if applicable): British Veterinary Association (BVA)

The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 18,000 members, our primary aim is to represent, support and

erinary profession. We, therefore, take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory

Section 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 does not provide sufficient clarification regarding home breeding. We recommend addition of the following lines:

t kennel facilities outside of the home environment, they must comply with the full accommodation requirements.

Where dogs are kept as part of the family within the home environment, it is accepted that enrichment and enhancement will be provided by a comfortable home environment. However, consideration of available space and numbers of dogs within that space must be complied with

Furthermore, we are disappointed that the guidance is not undergoing a more comprehensive update and are concerned is a missed opportunity for Welsh Government to demonstrate its commitment to animal welfare in Wales. We have provided further details in the final section of this consultation response.

We urge the Welsh Government to undertake a more comprehensive revision of the guidance as soon as possible and would welcome the opportunity to work closely together to expand upon these proposals.

Section 3

Does the additional advice relating to the setting of staff to adult dog ratios make it clear the inspecting Officers should consider this on a case by case basis? For puppies

For the avoidance of doubt, the additional advice should explicitly state that inspecting officers should consider the ratio on a case by case basis.

that all required tasks, including adequate exercise and socialisation programmes, are realistically able to be completed during the working day.

*If the conditions of the licence are not being met within the stipulated ratio consideration should be given to amending the ratio **to reduce the number of animals permitted per member of staff***

In this section, it would also be worthwhile explicitly stating that the inspector should consider the manpower requirements for socialisation of puppies.

Section 4

Do you agree the role of the private veterinary surgeon, and that of the inspecting veterinary surgeon, should be clearly separated and defined and inspecting vets should be

We strongly support

Conduct the initial or renewal inspection of a dog breeding establishment, boarding kennel/cattery, pet shop, or animal exhibitor.
Conduct an initial, renewal and annual inspection of horse-riding establishments. NB this only applies to veterinarians who are listed on the [RCVS approved riding establishment inspectors list](#).
Provide advice to other inspectors.
For the purposes of ensuring the licence conditions are being complied with, take samples for laboratory testing from any animals on premises occupied by an operator.

expected that the business will be able to meet the licence conditions (both the general and specific conditions).

Veterinary inspectors should agree their role with the local authority in advance, and be clear on whether they will be expected to accompany a local authority animal welfare-trained officer or conduct the inspection themselves. If a veterinary inspector is to undertake an inspection on behalf of a local authority without a suitably qualified officer present, then the local authority should appoint the vet as an inspector under section 51 of the Animal Welfare Act 2006.

Veterinary inspectors must only inspect to the conditions set out as part of the statutory guidance for each licensable activity, and follow the [RCVS 10 Principles of Certification](#).

Read the [statutory guidance for each licensable activity and licence conditions: Animal activities licensing: guidance for local authorities](#).

The role of private veterinary surgeons

As part of the General Conditions of the regulations it is stipulated that:

The licence holder must register with a veterinarian with an appropriate level of experience in the health and welfare requirements of any animals specified in the licence and the contact details of that veterinarian must be readily available to all staff on the premises on which the licensable activity is carried on.

Private veterinary surgeons who are not veterinary inspectors may also be asked to:

Agree a preventative healthcare plan (PHP) with a licence holder who is

[BVA, BSAVA, BVZS, CASC and CFSG preventative healthcare plan \(PHP\) guidance notes for private veterinary surgeons](#) and [download our template preventative health care plan](#).

Conduct a puppy veterinary health check before the sale of a puppy to a new owner;

Signpost and help the licence holder or prospective buyer to complete a puppy contract, such as [The Puppy Contract](#); or

Provide appropriate isolation facilities to a licence holder for the care of sick, injured or potentially infectious animals in the event that they are not able to provide separate, self-contained facilities at the licensed establishment. In this

"LAs should ensure that [condition]", making it clearer that LAs are responsible for making sure these standards are met.

1.2 Size of Quarters

The minimum requirements for enclosure size must be addressed. The current requirements are below the standards set in England and the guidance provided by the European commission.

Taking into account the recommendations from the review group and the European

Where dogs are kept as part of the family within the home environment, it is accepted that enrichment and enhancement will be provided by that comfortable home environment. However, consideration of available space and numbers of dogs within that space must be complied with. Where small scale breeders use purpose built kennel facilities outside of the home environment, they must comply with the full accommodation requirements.

If it is not possible to clarify the guidance on kennel sizing and exercise areas in this version of the guidance until further stakeholder consultation, then there is an opportunity to change the minimum exercise duration and also the frequency of exercise for adult dogs. For example, it could be stipulated that dogs must have a minimum of 1 hour exercise per day and be let out of their kennel a minimum of three times per day, to avoid the possibility that they are locked in for 23.5 hours a day. It is important to remember this is the only exercise these animal get throughout their lives, so the minimum exercise requirements within this document dictates the quality of their life for the duration of their breeding lifespan.

1.4 Temperature & Heating

It should be made clear that the raised temperature for heating 26°C to 28°C refers to a local heat source, which animals must be able to move towards or away from.

1.11 Puppy Facilities

The g . This needs to be stronger, with a requirement to set aside an area for socialisation that mimics environmental conditions in a home and work environment. It should also be stressed that all potential working dogs (with the exception of hunt hounds, who are very rarely re-homed as pets) need be exposed to both environments. Breeding alone is not an indication of whether a puppy might end up in a working or pet home, and therefore it should be prepared for both possibilities later in life. Failed working dogs that are rehomed as pets later in life are even more in need of socialisation skills as they are older when entering the home environment.

2.1 Food & Drink

We are unsure where the recommendation for puppies to be fully weaned at 6 weeks of age comes from. It may take longer to fully wean a puppy, and they must stay with their mother until 8 weeks of age.

dimensional space to allow for exploration and play, in addition to space for sleep and basic activity. There must also be constant access to a dedicated outdoor run which also provides an enhanced and enriched environment for play, exploration and basic exercise in addition to toileting.

3.2 Socialisation

This section needs to explain further that, before sale, puppies should be introduced to as many normal experiences that they will encounter in later life as possible. *Gradual introduction of low level noise* as this could be taken to mean any type of noise at all. We recommend the wording *level noise emulating the indoor and outdoor environments that the puppy will be exposed to in later life. For example, crowds of people, traffic noise, domestic appliance noise, or noise that will be encountered in a wor* .

4. Health and Welfare

We are disappointed that the guidance lacks any requirement for a veterinary inspection prior to a licence being granted. It also lacks any requirement for a minimum frequency of veterinary inspections of licensed establishments.

4.2 Health and Welfare Plan

Microchips should be used to identify puppies which have received vaccinations and recorded accordingly. It should also be comply and record the information, not that of the veterinary surgeon.

Section 4.3 Medicines

We are concerned that there is insufficient

Section 4.7 - Strategy for the retirement of breeding bitches and stud dogs

Home breeders often keep retired breeding dogs rather than rehome or dispose of them. This option needs to be catered for under in the first paragraph.

It should also be considered within the added text, which could read:

breeding animal that is to be re-homed should be neutered prior to re-homing,