

in these animals has snowballed into an informal sanctuary or rehabilitation centre. Again, NCTAs and wildlife are particularly at risk here due to their specialised needs.

6. Although those who operate sanctuaries and rescue and rehabilitation establishments often have good intentions, the ethics and quality of care given varies widely, as does the knowledge and capability of the individuals running them or working/volunteering. Sanctuaries with a poor infrastructure, however well-meaning they may be, can become overburdened resulting in closure of the sanctuary which puts animal welfare at risk and the welfare of wildlife in particular often suffers as a result. Licensing, which should involve inspection, oversight and minimum standards of knowledge, capacity, welfare etc., would help to avoid such problems.
7. A licensing regime will also help to draw a clear line between keeping pets, and operating a welfare establishment, and clarify for well-intentioned animal-lovers what they need to provide in order to rescue or rehabilitate animals.
8. In addition, better application/enforcement of existing rules and much improved consistency across local authorities is required. Finally, more resource is required for Local Authorities, as currently they are very much underfunded and their work, particularly in relation to wildlife, is poorly understood by many.

Do you agree that Animal Activities (human engagement services, doggy day care, dog walking, home boarding, livery services etc) should be subject to licensing?



14. To help enforcement officers at local level identify commercial dog walkers, a register could be set up that lists such dog walkers, and an identity card could be issued to walkers which they should carry, along with insurance details, when carrying out commercial activities. The focus should be on protecting public safety and animal welfare. We are aware that local authorities and other enforcement bodies are already struggling to ensure compliance with existing legislation on animal welfare related activities due to a lack of resource. Action on dog walkers failing to protect animals and the general public should therefore not be focused on whether someone is a professional dog walker and whether they have a licence, but on the actual failure to comply with existing legislation protecting animal welfare and public health which applies to anyone in control of a dog. These aspects cover canine diseases, zoonoses and public safety aspects such as the type and number of dogs walked.
15. We have not collected any case studies on dog grooming businesses. However, due to the nature of the activities carried out, there is undoubtedly potential for dogs to come to harm if procedures are carried out without the necessary training or care, and in unsafe spaces without a good standard of hygiene or using unsafe or poorly maintained equipment. If done incorrectly, activities such as nail clipping, emptying anal glands, or clipping matted fur can affect welfare and require veterinary treatment. Groomers should be clear what procedures are required to be carried out in compliance with the Veterinary Surgeons' Act (VSA) 1966 such as dentals and be sufficiently trained in any other services they provide.
16. Dog grooming is a trade where training courses and recognised qualifications are already widely available. Although it is obviously possible for trained providers to make errors, particular dangers arise from providers with little or no training claiming to be experienced dog groomers. Additionally, dog owners currently have to rely on their own assessment of the services and qualifications listed. Requiring a recognised qualification, would be an essential part of any licensing regime.
17. For day care and boarding, it is important that the conditions of the licensing regime are designed to take account of the differing needs of cats and dogs. In addition, if other animals are included, their needs as separate species would need to be considered.
18. The provision of day care (where no overnight boarding services are provided) should be covered by the regime. However, the requirements should be designed in a way to avoid unnecessarily impacting the voluntary non-commercial provision of this service. Those service providers will still be covered by existing animal welfare legislation which

expertise will also be needed to properly enforce regulations with regard to NTCAs and wildlife.

Do you agree that a licensing scheme be introduced to strengthen existing legislation re animal exhibits i.e. people who take animals to parties such as reptiles, birds of prey centres or other travelling and static animal exhibits?

Yes No Don't Know

21. Our 2022 Voice of the Veterinary Profession survey found that over eight in ten vets (81%) were concerned that the welfare needs of NTCAs were not being met, with the most cited welfare issue being 'irresponsible animal ownership' (82%). Vets who treat NTCAs report that over half (58%) of the NTCAs they see do not have their five animal welfare needs met.
22. These statistics were not referring specifically to exhibitors, but they demonstrate the difficulties of ensuring the welfare of these species. As noted under sanctuaries and rescues above, there is also potential for hobby keepers to develop this kind of business without being able to scale up the facilities and care they provide accordingly. A licensing regime would help to clarify the requirements for any such business, stipulating appropriate veterinary provision, premises, insurance etc.
23. Overall, it is necessary to ensure that these animals are being kept in suitable accommodation. Anecdotal evidence suggests that there are some extremely good/knowledgeable rescue organisations that do this for education purposes very well however, for some, they have been set up purely for commercial reasons without due consideration to the stress/welfare implications. Oversight of these activities is desirable for reasons of animal welfare; safety of the animals involved; disease and zoonoses control; and public health.
24. Any licensing should encompass minimum standards of knowledge, capacity, welfare and attention to health. However, licensing is of minimal, if any, value unless there are local authority resources sufficient to run and enforce such schemes.

Do you agree that owners and/or keepers or trainers of racing dogs (including greyhounds) should be subject to licensing?

Yes No Don't Know

25. BVA and BSAVA welcome the Welsh government's proposals to licence greyhound racing in Wales. We supported the introduction of the Welfare of Racing Greyhounds Regulations 2010 in England, and the subsequent licensing of tracks through GBGB. While there are still potential areas for improvement, it is of concern that there are currently no comparable regulations in Wales, although the one operational track has recently come under the aegis of GBGB. While these dogs are ultimately protected

following the race or trial to help identify and treat any injuries. Veterinary presence is essential to ensure the health and welfare of all dogs. The introduction of this requirement in England has had a positive impact on independent greyhound tracks in particular, where prior to the introduction of the Regulations there was no requirement for a veterinarian to be in attendance. As indicated above, having a suitable vet in situ also means that first aid, pain relief or euthanasia can be promptly provided.

We are aware of significant public interest in the welfare of racing greyhounds. Further to the above question on the licensing of owners, keepers, or trainers of racing dogs, we seek evidence to justify or negate consideration of a phased ban in future. Please tick the box which most appropriately reflects your opinion on whether a phased ban should be given consideration.

For a phased ban

Against a phased ban

Undecided

27. BVA are in the process of formulating a position on animals in performance sport and are unable to give a definitive answer until this is complete.
28. We support the ethical use of animals in sport and many veterinary surgeons work at the heart of the greyhound racing industry. However, the ethical use of animals in sport must be predicated upon high standards of welfare and, as vets, we have a role in promoting that welfare.
- 29.

31. This is not within our area of expertise.

We have outlined the issues we are considering with regard to licensing animal establishments, activities and exhibits and considering future regulation of dog racing and have asked you to give specific answers to our questions above. If you have any further comments you would like to make on these issues, please enter in the text box below:

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