## Response to petition questionnaire.

**Questions you may wish to consider in responding**

**1. Do you feel that the Welsh Government (or another body) should investigate the enforcement of animal welfare legislation in the dog breeding industry in South-west Wales?**

**Yes, there should be a body to investigate or oversee enforcement of animal welfare in the dog breeding industry in South -west Wales. This body should be independent of any council and should NOT be connected to the Kennel Club.**

**The reason for a body to investigate is that Puppy Love Campaigns have presented evidence of cruelty and breaches in license conditions to both Carmarthen council and Ceredigion, and, have been met with either denial there is a problem or excuses for no action taken. We have helped 3 TV companies to make programmes showing the neglect yet still there was no decent enforcement or prosecution to follow exposure . The worst of these was in Ceredigion where we exposed an unlicensed breeder, on seeing our film Dogs Trust vet, Chris Laurence said on camera to BBC Wales they were the worst conditions he had ever seen in his long career.**

**The breeder held 92 dogs on an unmanned farm, conditions were disgusting. There were dogs needing veterinary treatment, serious eye conditions both in pups and adult dogs, skin complaints which meant the coats of some dogs were literally hanging off. There was also a lame dog and pup. The breeder was allowed by Ceredigion council to disperse dogs (possibly to other breeders) and to take some dogs for euthanasia. Thank fully a couple of the dogs were saved by vet and passed onto rescue. One dog needed an eye removed another had**

lungworm and very bad hips.
In our opinion this breeder should have been prosecuted for cruelty but Ceredigion council gave him a license to keep 12 breeding bitches once he had cleaned up the hell hole the dogs were living in. He was still allowed to keep the dogs on unmanned premises and when we paid him a visit after license was issued conditions were not much better than before. Dogs had no water or food and some pups had eye conditions. We have film and photographs of this establishment which we can supply for you or if you can visit http://www.puppylovecampaigns.org/investigations.shtml this page of our website and view the fist video from the BBC it will show you the case in full.

**2. Do you feel that dog breeding licences are granted too easily? Do the requirements that need to be fulfilled before a licence is issued need to be tightened up?**

Yes, licenses are granted far too easily, even before all license conditions are in place. If an unlicensed breeder is discovered LA's do their upmost to issue license as soon as possible. The case above shows how easy it is for breeders to get a license even after neglect and cruelty is uncovered.

Licenses are given to old sheds, pig pens, barns and even old metal freight containers from the backs of lorries. We know of at least one other premises in Ceredigion where 50 dogs are kept on unmanned property. This is totally unacceptable.

**3. What are the barriers to the effective enforcement of animal welfare legislation in the dog breeding industry?**

There is a lack of common understanding across licensing authorities of the specific issues relating to companion animal welfare.
Some councils clearly regard dog breeding as a purely agricultural livestock business rather than a highly specialised activity in which the product is a domestic pet with a potential life expectancy of 12 to 14 years and where the outcome for the final purchaser is entirely dependent on the knowledge, care and practises of the breeder. Another consideration is the likelihood that some of these establishments are owned/operated by person/persons known to the LA

There also appears to be a predisposition in favour of the farmer, particularly in Carmarthenshire and Ceredigion. On a number of occasions, enforcement officers have been presented with photographic and video evidence of failure to comply with the Animal Welfare Act 2006 and license conditions, yet rather than acting promptly and with minimal advance notice to the breeder,

inspections take place days later and notice is given, unsurprisingly, improvements in standards are reported, albeit temporarily as no follow up is made.
Licences have also been readily granted to puppy farmers previously trading illegally as an adjunct to an existing agricultural business and where evidence of previous bad practise has been provided, but with no ongoing monitoring.

4. Do you feel it should be compulsory for all pups to be microchipped before sale?
   Yes most definitely, traceability is a must

5. How big a problem is unlicensed dog breeding in Wales?

Very big, its estimated there are as many unlicensed premises as there are licensed . RSPCA has just made a statement which says there are 2000 breeding premises in Wales. Puppy Love think the majority of these are unlicensed. If and when these breeders are discovered if licenses are issued the problem will be even more out of control than it is today. This would be huge concern to campaigners and the general public alike.

Notes ; Puppy Love Campaigns are the largest and most active anti puppy farm campaigners in the UK . We take many reports from the public about sick or dead pups they have purchased from pet shops or small ads . Most of these pups have started their lives in Wales, among filth and disease and some are riddled with hereditary health problems. We would urge you to consider this petition very carefully before the name of Wales is tainted any further.

We have no objection to providing oral evidence we can also show video evidence if you so wish.

Veronica Lambert
and the Team

http://www.puppylovecampaigns.org

Puppy Love
Campaigns

Welcome to Wales = Puppy Farm World.
Puppy Love Campaigns

www.puppylovecampaigns.org

Puppy Alert Response

**Response to questions asked by the Petitions Committee**

**Q. Do you feel that the Welsh Government (or another body) should investigate the enforcement of animal welfare legislation in the dog breeding industry in South-West Wales?**

A. Yes, I strongly believe that the Welsh Government or an independent body answerable to the Welsh Assembly Government should investigate the enforcement of animal welfare legislation in South West Wales.

**Q. Do you feel that dog breeding licenses are granted too easily?**

A. Yes, dog breeding licenses are granted too easily allowing dog breeding to be carried out in premises that should not be allowed to be used for the purpose of breeding dogs and raising puppies. This is particularly noticeable if the dog breeder has a farming business, in the main livestock or arable farming. By doing so Councils are allowing dog breeders to accommodate dogs and puppies in premises previously used for livestock or storage, such as large agriculture sheds, agriculture barns, poultry sheds, pig sty's and even large containers such as one would expect to see on the rear of articulated lorries are considered by the Council to meet the standards required for licensing under the Breeding and Sale of Dogs (welfare) Act 1999.

These types of buildings are expensive to adapt for dog breeding and impossible to heat (the majority are never adapted but are used by the breeders for their dogs in the same condition as they would have used for their livestock). They are unsuitable to be used for the purpose of containing dogs for the purpose of breeding long term (from birth to eight years or more). This practice results in hundreds of dogs accommodated in isolation and often sever deprivation, in small, damp, concrete cubicles (previously used for calves/sheep). Many dogs and whelping bitches are not provided with adequate beds and bedding and many breeders do not supply a whelping pen or an isolation unit if a dog is unwell and contagious. Most do not have exercise areas attached to their sleeping quarters which would allow dogs during day time hours, to have natural daylight and free exercise, which is part of the licensing conditions but are accommodated indoors without natural light and isolated from human contact, other than when fed. Yet these dogs are producing puppies for the purpose of being sold to pet homes through the puppy trade but have no knowledge of humans of being handled of the world outside their concrete cubicle or pen.

These buildings cannot meet the standards as intended or one would expect in the Dog Breeding and Sale of Dogs (welfare) Act 1999. Councils are applying the legislation very loosely and are lax in ensuring the standard as intended by the Act are met before granting a licence. If these buildings could not meet the standards required to be suitable for licensing under the Dog Boarding Establishments Act for owners who wished to board their dogs in kennels for short periods of time,days or weeks) then they should not be considered acceptable by Councils for licensing as dog breeding kennels.

Individuals who apply for dog breeding licenses, to keep breeding dogs, (dams, sires) in these agriculture buildings are expecting to keep their dogs in confinement for a lifetime of breeding, which is eight years or longer and to accommodate and breed from as many dogs as the building will allow. This is in many cases can only be described as the battery farming of dogs, with the approval of the Council who are responsible for granting the licence and in some instances planning permission.

Although it is not in the licensing Inspectors remit to ensure the premises have planning permission

for dog breeding prior to granting a dog breeders licence, it would make practical sense for the Council Public Protection/Environmental Health Department (responsible for issuing a dog breeders licence) to communicate with their own Planning Department to ascertain whether the premises have applied for planning permission or change of use from agriculture to dog breeding (if applicable) before they issue a dog breeders licence. Failure to communicate is no excuse for premises to be operating without planning permission or to increase the numbers of dogs from the number stated on the original planning application. An example can be highlighted here with addition information on my **blog: hhtp://batterydogfarmingdealerspetshops.blogspot.com/**

One premises applied for planning permission in 1994 for the change of use of calf pens into dog kennels and approval was granted for 9 dogs. This permission required prior approval of the Local Planning Authority for any intensification of the business. Over the next 17 years the numbers of dogs on the premises had intensified until in the last 2 or 3 years the numbers reached 140 dogs, then 180 dogs but the current figure is now 196 dogs that the owner is licensed to keep on the premises. However, the owner never contacted planning during the 17 years to advise them of the intensification of his business. The owner, a sheep farmer now has in addition to 196 dogs, 120 acres of land, with another 100 acres rented, 850 breeding sheep and 200 followers. The sheep farmer/dog breeder employs 1 full and 1 part time staff, who is also the farmers wife and works full time for the local authority. In addition to their sheep, dogs and puppies they also have children to care for.

It was early this year that Puppy Alert contacted Carmarthenshire Council Planning (Enforcement) regarding an application by this sheep farmer for an agriculture shed on his premises (which had permission granted 'determined for agriculture use' a few months previously). With the knowledge that he was already the largest dog breeder supplying dealers and pet shops in S W Wales with puppies I had my suspicions that the agriculture shed was likely to be used, not for sheep and storage as the application stated but for accommodating dogs. This was found to be the case when the enforcement officer visited the premises.

The shed was fitted out with cubicles for dog breeding, ceramic tiled and with automatic drinkers for the dogs. At this time the premises were licensed (last inspection report 140) in fact 161 dogs counted. I asked the Enforcement Officer after his visit to the premises how many dogs he thought he may have seen and I suggested to him 140 dogs, he laughed and said, 'you can double that figure'. I was astounded and immediately contacted the department responsible for licensing the premises, who denied any knowledge or that the figure (double the licence number) was true. I was not believed and to make it necessary for the Council to take me seriously I suggested that they speak to the Enforcement Officer who could confirm to them what he saw. The licensing officer said he would need a statement from him (the Enforcement Officer) which I understand having spoken to him again later, he was prepared to give.

Puppy Alert asked for the support of the public asking them to write in to the Council objecting to the planning application on these premises for change of use from agriculture to dog breeding. By doing so it would mean the application for change of use should then to go before the planning committee rather than to be decided under delegated powers. The objections I believe were nearly 800 but the application was passed by the planning committee who were guided by their planning officer to vote for approval. This decision gave Carmarthenshire its largest licensed battery dog farm, now complete with planning permission for 196 dogs and their puppies and no staff to care for them. This is a very irresponsible decision and has set a precedent for others to follow.

I was astounded to realise there was another 'new shed' on the premises other than the one I refer to above, which came to my notice about 4-6 weeks prior to the application highlighted above going before the Councillors on the planning committee. Whilst I was concentrating hard on asking

people to object to ensure the application would go before the elected councillors on the planning committee, this other application for change of use from agriculture to dog breeding was swiftly determined without my being aware until too late (this was late 2011) by the planning department.

I then realized that what was referred to on a inspection report of 2008 as (new shed) was this earlier built shed that was for agriculture use too and again the applicant did not have planning permission for change of use either but was also being used to accommodate dogs. Again neither planning or licensing were prepared to take any action against the applicant, planning only suggested he put in a planning application for change of use (which he did in 2011) and Public Protection responsible for licensing did not take any action regarding the increase in numbers of dogs.

This has now set a precedent for other farmers or anyone with a farm holding number to follow, apply to the Council for an agriculture shed which will go under agriculture determined which is a formality, fill the shed with dogs (if you already have a licence) or apply later for one (the Council very rarely prosecute for unlicensed dog breeding, they give a slap on the wrist and then issue a dog breeders licence). Then the farmer, dog breeder apply for change of use from agriculture to dog breeding, no questions asked and you have yet one more licensed battery dog farm with planning permission. It is too easy for farmers to have a few breeding dogs, then for it to become a cottage industry, then before long it is an established business of breeding dogs for the pet trade with hundreds of dogs having litter after litter on a conveyor belt system. None of these dogs are health screened for known hereditary diseases under the KC/BVA health screening schemes for pedigree dogs. Many of these breeders do not regularly vaccinate and worm their dogs or visit a vet with them due to cost. Due to the fact that they sell litters of puppies to dealers they are never held responsible for all the puppies that due to poor living conditions, breeding practices become ill or die soon after purchase from a dealer or pet shop, they are never held accountable. Even when Puppy Alert has notified the Council that a puppy sold from one of their premises (if puppy sold with breeder details, this is rare) has died or is a carrier of a contagious disease, there is little interest.

The Council by ignoring the increase in numbers of dogs and re-issuing the licence each year for these premises have already failed in their duty of care, lacked integrity by not ensuring the welfare of the dogs were not going to be compromised by doing so. The Council must have been aware that the farmer did not employ staff specifically for the purpose of caring for the dogs and their litters of puppies, therefore why did they not ask he reduce the numbers of dogs or employ staff or revoke the licence? Why wasn't the farmer/dog breeder questioned over the yearly increase in numbers of dogs on the premises used for the purpose of breeding and producing litters of puppies that were sold to dealers and pet shops?

Why when Puppy Alert contacted planning enforcement earlier this year did they ignore the fact that the sheep farmer had never asked for planning permission to intensify his business and increase the numbers of dogs on the premises until after enforcement were notified? Why was an enforcement notice not served on the premises? Not just for one agriculture shed but as I later learnt for two!

It s interesting to read the licensing inspectors comments on visiting the premises in the preceding years.

14.08.2006: 95 dogs. Manhole covers to drains to have covers. Isolation pen change. Records ok need to be more specific for each breeding bitch. Stated he was in the process of getting records computerized. Possible overcrowding in some pens. Bedding, sawdust/ shredded paper. Will need to be inspected before next application!! Exercise facility – yard out front of buildings, needs

cleaning.

**Therefore no attached exercise facility and overcrowding in pens and no proper bedding, it was suggested another inspection before next yearly application but the next inspection visit was not until 11.05.2007.*

11.05.2007. 125 dogs. Slightly overcrowded in some pens but satisfactory to licence. Separate isolation (convert old garage) before next licensing visit in December. Bedding, shredded paper.

**Overcrowding, with 125 dogs there was even at this time a reason to reduce numbers of dogs. There was no isolation unit.*

14.08.2008. 116 dogs plus 15 litters. (New Shed) Mesh cages /pens in old shed need attention. Build up of cobwebs and sawdust, needs cleaning. Fire extinguisher's needed in new shed. Records well kept. If dogs use area outside 'new shed' as an exercise area then this needs to be void of hazardous materials. At present it could cause injury.

**Due to the condition in the area outside the 'new shed' it does not indicate to me it used for exercise for 116 dogs. Condition of pens cage needed attention. Needed cleaning. No fire extinguishers.*

Sorry, need to locate inspection report for 2009.

07.12.2010. dogs 161 plus 17 litters. More dogs from isolation pens should be clear at all times. Fire extinguisher and no smoking signs needed in new block. Keep an eye on cocker spaniel showing early type of stereotypical although assured us this was due to the presence of strangers and she does not do so all the time. Bedding shredded tissue paper. Temperature – low freezing temperatures outside, good inside heat lamps.

**Even more dogs, isolation pens not clear, query over mental behaviour of dog – kennel stress, going crazy? No proper bedding, no mention of beds. Very cold. Only puppies would have heating lamps and whelping bitches – other dogs would not only shredded tissue paper. Not adequate.*

From these inspection reports of the premises in question it does indicate the numbers and the concern over parts of the licensing conditions but it has not prevented the council limiting numbers dogs (no staff) but allowing the increase to todays figure of 196 dogs plus litters, no fire fighting equipment, an accident waiting to happen. Unlike dog boarding kennels (at least in England) and dog breeding kennels they are inspected by a fire officer. Why does this not happen in premises in Wales?

**Waste**: this is something that I felt should have been a consideration in all premises and this was something I communicated with the Environment Agency over. Some waste from dog kennels is hazardous waste but reading inspection reports the method of disposal is so varied, meaning many dog breeders are breaking the law but still it continues. In view of how many dog breeders do not appear to use a vet at all or only if a dog is unwell one has to question what happens to the dogs and puppies bodies that die or are still born etc on the premises?

The council does not ask these questions but with over 3,364 breeding bitches in nearly 90 licensed premises in Carmarthenshire capable of producing 16,820 puppies per annum with equally as many breeders operating unlicensed. Add this to the number of dogs in licensed premises in Ceredigion and Pembrokeshire resulting in breeders not complying with the Environment Act and acting responsibly due to the methods of disposal used by them. Yet the Council are not taking any action

to ensure the dog breeders comply with good practice to safeguard the environment in not allowing hazardous waste to go into water courses or into the air.*
**Website: http://sites.google.com/site/puppyalert/**

Puppy Alert has requested the yearly inspection reports of dog breeding premises over the last few years. It appears to me the re-issue of a yearly dog breeders licence is an automatic formality by the department responsible for licensing dog breeders. The Inspector questions the dog breeder, ticking boxes, making notes, sometimes even making constructive comments which do refer to none compliance with the licence conditions, then it appears returning to the office and filing the inspection report away until the following year without ever taking the dog breeder to task over none compliance. Is the senior environmental health officer responsible for licensing ever asked by the inspecting officer to take into consideration the inspection reports with a view to revoke the licence? It appears not.

When Puppy Alert has with valid reason complained to Carmarthenshire County Council regarding premises, particularly after TV programes or undercover video film highlighting the appalling conditions for the dogs in some premises. My concerns have not been taken seriously but dismissed in some instants, as time wasting. The Council I feel is very protective of the dog breeders they licence or maybe it is because they do not like to be reminded of their own failings in granting licenses to premises that are sometimes not fit to be licensed and are lacking in concern for animal welfare.

Time and time again the same comments are made on inspection reports such as the following, most contravene the dog breeding licence conditions:-

**Record keeping.**
Records of puppies sales not seen, although selling to London and Manchester pet shops.
Records incomplete.
Records not seen.
Records with the accountant
No records seen today
Records need to be kept up to date.
Some records missing.
Re- visit to check records – records checked lack details of purchasers.

How can the Inspector know if licence conditions relating to the breeding of the dogs are not ready for inspection, complete or inadequate? Such as the numbers of litters each breeding bitch produces, the one litter in 12 month period applies and can verify who the puppies were sold to, if the licence holder is not keeping records or fails to keep them up to date?

**Exercise**, the dogs are supposed to have an exercise area separate but attached to their sleeping area according to the licence conditions but a large majority of breeders do not supply an exercise area attached to the sleeping/kennel area. The Inspecting officer accepts the dogs breeders word that dogs are exercised in a yard or field and this is sometimes noted on the inspection form. But this is not what the legislation intended. It was intended that dog breeding establishments should have free access for the dogs to an exercise area attached to the kennel area. The licensing officer has no proof on a once yearly visit that the dogs are exercised in yard or field. Therefore why has the licensing officer and the vet during their initial licensing inspection said that an exercise area must be part of and attached to the kennel before a license is granted?

In view of many dog breeders stating they do not display their licence or anything that would identify them as dog breeding on their premises due to criminal damage by animal activists it is

highly unlikely they would exercise all their dogs outside in fields and yards (between 10 and in some cases 196 dogs each on nearly 90 different premises in Carmarthenshire) when they fear to be identified as dog breeders, as they put it by 'animal activists'.

Powys Dyfed police were unable to confirm but as Carmarthenshire County Council offer this as one reason for declining complete information on Freedom of information requests stating 'due to animal activist and criminality' together with data protection for obliterating names, addresses, telephone numbers etc from all inspection reports when they are requested by the public (Puppy Alert). Even when the request is for just one named premises it is refused as they say I would be able to identify the premises, of course I have to identify the premises to request the information in the first place. Therefore does not make any sense at all.

**Kennel area,** a few of the licensing officers comments in respect of the kennel accommodation such as:-
Incomplete work on sheds.
Clear clutter.
Pups need extra bedding.
General clean up.
Light in puppy pen artificial light, no natural light.
Some wooden beds to be replaced.
Power hose, green on some walls.
Wood in kennels and kennel runs.
Bird poo in kennels.
Flies using fly trapper lots of flies will use more.
Wooden matting needs to be replaced as only wooden sheet in some kennels.
Sharp edges on puppy walls.
Whelping shed need pressure wash change plastic beds.
Clear cobwebs. Cobwebs, bird excreta.
Disinfect kennels and thoroughly clean.
Rendering in top shed incomplete.
Isolation unit to be completed.
Isolation facility required.
Advised to clear out isolation in case required.
Ensure food bins are covered. Food to be kept in vermin proof bins.
Fire extinguisher still required.
Fire extinguisher and no smoking signs in new block.
Fire extinguishers require regular servicing.
Fire extinguishers advised maintenance.
Advised to purchase new fire extinguishers (2 or 3).
Check fire extinguisher needle on red.
In process of cleaning and replenishing water (water bowls soiled and empty)
Wooden platforms to be replaced.
One kennel lacking natural light.
No free access to exercise runs – let out in field when Mr ** is not at work * no evidence!!!
Water drinkers now removed from whelping pens.
Clear roof of main block to allow in more natural light.
Bird excreta particularly in whelping block a problem
General spring clean required.
Poor cleanliness in kennel pens.
Bird excreta in whelping area.
Unnecessary tins and objects in whelping area.
Isolation pen ok but not ideal.

Bones, advised check claims they were their leftovers from dinner and the dogs were fed scraps this morning.
Previously had pm on pup, results came back as parvo virus and some have died a few days after receiving their parvo jabs. No mention of this being followed up by Council Inspector, parvo virus is highly contagious.
Need exercise runs.
Clear out isolation
Increase number of pens or decrease number of dogs. Arrange vet inspection when has addressed the 'above'. The 'above' in this case was one boxers eyes not very good and red cocker spaniel treating with eye ointment from vets.
Sharp edges in barn (old cow shed) dark without artificial lighting. Old cow shed need more exercise facilities.
Bottom shed dogs let into alleyway for more exercise
Overcrowding in some pens
Rendering needed.
Isolation must be separate and comply with conditions (not the bathroom)!
Suggest warmer bedding material as currently sparse sprinkling of sawdust.
Dogs need clipping
Dog circling
Keep an eye on cocker spaniel as showing early signs of stereotypical behaviour.
Timid blue roan cocker spaniel hiding behind plastic bed.
Water bowls empty.
Unpleasant smell on approach to kennel, cleaning at time of inspection 3.30pm.
Lighting in kennels not efficient when top door to kennel block is closed.
No smoking signs.- Many times
Licence not displayed – many times some breeders stating due to animal activists.
Emergency sign – not displayed.
Fire evacuation notice – not displayed.
When asked of details of vets and if vet visited premises many could not name a vet practice and others said only if needed.
One breeder said vaccinated themselves – which is illegal unless under supervision of the vet.
These are a selection of the comments noted on Carmarthenshire County Council inspection reports, there are many more. The same comments apply from one year to next on some reports many of the comments are none compliance of licence conditions but they are never actioned.

It is known that agriculture barns have no heating and are impossible to heat in winter, other than sometimes small areas with infra red heaters for whelping bitches and puppies but the dogs are still contained within small concrete pens often without adequate beds or bedding. Some just have cow matting, often no bedding given and just wooden pallets or bakers plastic pallets.

Dog breeders should never be issued with a dog breeders licence when they do not live on the premises and the dogs are accommodated in a barn or shed a considerable distance from the dog breeders home. But licenses have been granted under these circumstances. This is totally unacceptable. Made even worse when the barn in question does not even have a door!

**Q. Do the requirements that need to be fulfilled before a licence is issued need to be tightened up?**

Yes of course they do. I have outlined some of the problems in my answers above. Another great concern of course is the number of dogs permitted on premises. The Council disregards numbers of dogs and year after year allows numbers to increase with total disregard of the dogs welfare. For example how many members of the family are responsible for the daily care of the dogs, how many

hours can they give to attending the dogs needs and importantly if prospective applicant own a farm that is their main business, are they going to employ staff to care for the dogs.

This has recently been highlighted when Puppy Alert contacted Carmarthenshire Council planning department (enforcement) please see link to my blog *

**http://batterydogfarmingdealerspetshops.blogspot.com/**

Staffing levels to be introduced and enforced and a ceiling for the numbers of dogs allowed in premises. Premises should not be able to increase numbers each year just by the inspecting officer noting numbers when visiting premises during the yearly inspection.

**Q. What are the barriers to the effective enforcement of animal welfare legislation in the dog breeding industry?**

The Council having low standards in compliance with legislation.

Inspectors not enforcing conditions.

Inspectors are making comments on inspection forms but they are just comments that lie dormant until the following year in other words a paper exercise. Maybe the barriers are the more senior members of staff who for whatever reason do not follow up on the comments made by inspecting officers and disregard the poor conditions known to prevail in some premises. I spoke to Mr D responsible for licensing with concern for a breeding bitch having to give birth to a litter of . puppies on concrete. He comment was that some breeding bitches prefer to give birth on concrete! The point I was making was that this breeding bitch had no choice but to give birth on concrete as no bed or bedding was provided by the breeder.

Inadequate number of licencing officers to check premises more than once a year.

Inspections are often pre-arranged with the breeder rather than always unannounced.

**Q. Do you feel that it should be compulsory for puppies to be micro-chipped before sale?**

Yes, for traceability and irrefutable identification of the puppy and breeder. As nearly two thirds of licensed breeders in S W Wales (possibly the same number unlicensed) sell their puppies to dealers and pet shops. Therefore puppies bred in Wales are being sold all throughout the UK. But it is exceedingly important that the breeders details remain with the microchip company and also that the microchip details including breeder details are passed onto the dealer and pet shop together with the puppy in a log book that is handed to the final puppy purchaser. At present licensed dog breeders are not complying with the current legislation relating to the puppy being sold to dealer and pet shop with a collar and tag. It is removed by the dealer or the dealer will not accept the puppy with collar and tag the same applies to the pet shop. The reason I feel is that dealers and pet shops can purchase litters of puppies from both licensed and unlicensed dog breeders and therefore they can mix litters. Also Welsh breeders supplying the pet trade by selling to dealers and pet shops do not like to be identified, I suspect in some cases due to tax evasion.

**Q. How big a problem is unlicensed dog breeding in Wales?**

It is thought it is equal in numbers as licensed dog breeders, therefore a big problem. This is due to the many factors, one is lack of premises being identified due to breeders being able to sell litters of puppies to dealers and pet shops (who can purchase and sell puppies by both licensed and

unlicensed breeders), when puppies are not identifiable they are not always traceable back to the breeder.

The availability of freead sites on the Internet and Internet puppy trading. Breeders using mobile numbers and some free-ad sites allowing hidden contact numbers to be used that offer privacy to the breeder/seller.

Puppy Alert

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Julie White response

An ending to puppy farming please, Wales should be taking the lead.
In the very least a humane approach which is well regulated.

**Kennel Club and Welsh Kennel Club Response to the National Assembly for Wales Petitions Committee Consultation**

Submitted on 30th November 2011 by: The Kennel Club,

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The Kennel Club and Welsh Kennel Club wish to respond to the following petition consultation as issued by the Petitions Committee of the National Assembly for Wales:

*'We call on the Welsh Assembly to urge the Welsh Government to stage an independent inquiry into the enforcement of animal welfare standards in the puppy farming industry in South West Wales.*

*This intervention and independent investigation is as a result of the widespread abhorrence at the ease with which the licenses are issued and subsequent lack of enforcement. This abhorrence is creating an extremely negative image of Wales throughout Wales, the United Kingdom and internationally. It is our contention that the setting up of an independent inquiry is the only way forward and will go some way in restoring the reputation of Wales throughout the UK and Internationally. Hopefully it will also curtail the activities of unlicensed puppy farmers & their reprehensible practices.'*

**1. Do you feel that the Welsh Government (or another body) should investigate the enforcement of animal welfare legislation in the dog breeding industry in South-west Wales?**

The current legislation is enforced to a varying degree from local authority to local authority, with particular areas of Wales having a bad reputation for allowing known bad breeders to continue to trade. The Kennel Club would therefore welcome a country-wide review.

Many local authorities argue that current legislation is not adequate to take appropriate action against unscrupulous breeders. Prosecuting is also hugely expensive for authorities meaning that they are often wary of pursuing cases unless they can be sure of a conviction.

To this end the Kennel Club supports the proposal within the recent Dog Breeding Review Consultation giving inspectors the ability to both suspend and revoke a breeding licence. We consider that to be a significant improvement on current legislation.

Members of the Kennel Club Assured Breeder Scheme (ABS) are currently regulated to a higher standard than those set in current or proposed future regulation. These standards are in the process of being upheld and monitored by the United Kingdom Accreditation Service (UKAS), an independent and recognised regulatory body. The Kennel Club therefore maintains that such breeders, who conform to a higher set of standards incorporated in a recognised breeding scheme that is properly accredited by a external body should continue to be monitored by scheme inspectors such as the Kennel Club's ABS Regional Breeder Advisors in order to free up already overstretched resources for inspecting breeders who fall outside such a regime. Relevant information could then be shared with local authorities including breeder details should they be suspended by any such schemes etc.

The Kennel Club's proposal is supported by Professor Patrick Bateson's recommendations within the Independent Inquiry into Dog Breeding 2010, which cited that the benefits of the Assured Breeder Scheme should include 'ultimately reduced level of Local Authority inspection'.

**2. Do you feel that dog breeding licences are granted too easily? Do the requirements that need to be fulfilled before a licence is issued need to be tightened up?**

As mentioned previously, the Kennel Club sees the problem in regards to breeding licences as centering around a lack of resources in local authorities and widely varying levels of enforcement from area to area. Local authorities have been known to reissue licences without reassessing the property or checking the welfare condition of the dogs; with local authority staff with little or no knowledge of dogs and breeding commonly being sent to inspect premises.

Poor quality premises where reasonable concerns have been raised should have an increased frequency of inspection. The Kennel Club also considers that the licence fee should be set annually by the Welsh Assembly Government. Licence fees vary hugely between local authorities even though the apparent costs are similar.

**3. What are the barriers to the effective enforcement of animal welfare legislation in the dog breeding industry?**

Adequate funding for enforcements officers is essential to sufficiently implement animal welfare legislation. The Kennel Club would also like to

reemphasise the need for inspection officers to be trained so that they are able to differentiate between good and bad practice.

We also believe regulation should go further by requiring breeders to:

- Health test the breeding bitch and stud dog for any inherited genetic disorders relevant to the breed such as hip or elbow dysplasia and inherited eye diseases in certain breeds;
- Provide written advice on feeding, worming, socialisation and training specific to the needs of the particular breed;
- Provide reasonable post-sales advice to the puppy buyer; and
- Draw up an appropriate contract of sale to protect the buyer and seller.

These additional requirements would ensure that not only would the immediate health and welfare needs of the puppy be met but also inherited health problems would be, wherever possible, avoided. Puppy buyers would be protected from unscrupulous breeders by the provisions of the contract of sale. This latter point is of the utmost importance as the current regime allows puppy farmers to extract large sums of money from puppy buyers with very limited recourse to consumer law when things go wrong, for instance if the newly-acquired puppy requires immediate veterinary attention.

**4. Do you feel that it should be compulsory for puppies to be microchipped prior to sale?**

The Kennel Club broadly agrees that all puppies should be microchipped before leaving the breeding premises – so long as the puppy is not re-homed before 56 days of age. However we believe that some relief should be given for breeders of particularly small dogs at the discretion of a vet or where there is a compelling medical or welfare reason not to do so.

The breeder should also be the first registered owner of the puppy to ensure greater traceability and encourage better welfare standards.

The Kennel Club also believes that all dogs kept at the breeding establishment should be microchipped in order to enable better enforcement of the limit on the number of litters that may be bred from each bitch. However we recognise that some relief should be given to provide exemption for older animals.

**5. How big a problem is unlicensed dog breeding in Wales?**

Unfortunately by their very nature, unlicensed breeders often stay ‘under the radar’ and therefore it is difficult to estimate the scale of the problem. However, the Kennel Club would highlight that current problems in Wales do

not necessarily sit solely with unlicensed breeders. Many puppy farms are licensed and working to the bare minimum standards of the law meaning that local authorities are often powerless to take any action against them.

**The Kennel Club regards it of utmost importance to note that the funding and number of enforcement officers available to enforce such regulations have been reduced significantly in recent years. The Kennel Club would therefore encourage the Government to carefully consider how effective enforcement can be assured, and if there is a danger that it cannot, to consider alternative inspection schemes if these are properly accredited by a body such as UKAS.**

**ENDS**

**The Kennel Club and Welsh Kennel Club would be prepared to give evidence in person.**

**Dogs Trust Response to Call for Evidence on Dog Breeding from the National Assembly for Wales Petitions Committee**

## Do you feel that the Welsh Government (or another body) should investigate the enforcement of animal welfare legislation in the dog breeding industry in South Wales?

Dogs Trust very much feels that the Welsh Government should investigate the enforcement of animal welfare legislation in the dog breeding industry, not just in South Wales, but in Wales as a whole.

It is generally accepted that the current legislation on the breeding of dogs is failing. This is largely because enforcement agencies find it difficult to detect many people breeding dogs and that the welfare of both the breeding stock and the puppies can be adversely affected as a consequence. There is therefore a general view that legislation should be reviewed.

## Do you feel that dog breeding licences are granted too easily? Do the requirements that need to be fulfilled before a licence is issued need to be tightened up?

Dogs Trust would agree with the question that dog licences are granted too easily in Wales and that the requirements that need to be fulfilled before a licence is issued needs to be tightened up significantly. Currently, licences are issued by Local Authorities but quite often premises are not properly inspected, or inspected at all, before a licence is issued or renewed and the criteria that LA's are inspecting against often have no correlation to the conditions and welfare of the bitches being kept or puppies being bred.

In addition, many commercial dog breeders and puppy farmers are operating without a licence and therefore not coming to the attention of LA's. Puppy farms are establishments where dogs are bred intensively for profit with little or no consideration for their welfare. Puppies are treated as products, mass produced in order to create maximum profit for the breeder.

Conditions are often crowded, dirty and poorly lit. The dogs sleep on bare floors with little or no bedding. The breeding bitches have a litter at every season (two litters per year) and are kept pregnant on a continuous cycle, nursing litter after litter until they are physically exhausted.

The pups have minimal human contact. They are usually not vaccinated or treated for worms and likely to be taken away from their mother before they are 6 weeks old, which

is considered by most vets to be too early. This fast turnover is the key to ensuring that the breeder only has to spend the absolute minimum on feeding the pups.

It is this intensive breeding that typifies a battery farming operation. Not all puppy battery farms will be on a grand scale, and some may only involve a few breeding bitches. However, they will all share one characteristic; a willingness to compromise the welfare of the dogs in order to maximize profit.

## What are the barriers to the effective enforcement of animal welfare legislation in the dog breeding industry?

The Breeding of Dogs Act 1973 was the first attempt to control dog breeding. The Act required any person with more than four dogs capable of breeding to be licensed. However many owners of multiple dogs had no intention of breeding, even though they had not had their animals neutered. Consequently enforcement of the legislation was ineffective.

In an attempt to improve enforcement a group including welfare charities, veterinary organisations and others sponsored a Private Member's Bill through parliament that became the Breeding and Sale of Dogs (Welfare) Act 1999. The licensing requirement was changed to either operating a business or breeding more than four litters in twelve months in an attempt to detect and licence more breeders. With the increasing use of mobile phones for the sale of puppies, it is difficult to use these parameters to detect unlicensed breeders and to gain sufficient evidence to prosecute them.

It is therefore self evident that attempting to define a dog breeder is, of itself, one of the major bars to effective legislation and its enforcement. Animal welfare charities and others have for many years attempted to educate the general public about how to avoid poor quality breeders but the unlicensed industry appears to continue to thrive in spite.

If the detection of a selection of breeders is the major difficulty in enforcing legislation, then it seems that the only solution is that all breeders should be known to enforcement agencies. However it is clear that the better regulation agenda would not accept the licensing of occasional or accidental breeders as such a measure would be widely perceived as draconian. However Section 13 of the Animal Welfare Act 2006 provides powers for the Assembly to differentiate different classes of breeders by enabling registration as well as licensing. The proposal is therefore that all breeders below a threshold should be registered whereas those above should be inspected.

## Do you feel that it should be compulsory for puppies to be microchipped prior to sale?

It is essential that puppies can be effectively traced to their source. A failure to be able to do so is likely to reduce the efficacy of enforcement as Trading Standards are less able to provide effective advice. We propose that all puppies should be microchipped prior to sale and that failure to do so should be a specific offence. This is absolutely critical to any proposed legislation on dog breeding.
Another essential element of the proposal is a requirement to include the registration or licence number on any advertisement for puppies for sale or gift, wherever the

advertisement is placed. Such action would make the detection of all breeders easier for enforcement agencies. It also allows a simple message for the public purchasing a puppy – they must ask to see the breeder's registration or licence number. Such a simple message is easier to convey than advice to see the rest of the litter and bitch before purchase.

In addition**,** Dogs Trust is calling for compulsory microchipping to be introduced for ALL dogs because it enables the prompt return of strays and the traceability of puppies.

Permanent identification of dogs is primarily a welfare issue enhancing the return of stray dogs to their owner (only half of dogs found are returned to their owner and 35% of those using their microchip). But it also provides useful enhancement of identification of dogs and their owners for other existing legislation.

Compulsory microchipping, can for example, provide a societal benefit in assisting in:

- returning genuine stray dogs to their owners swiftly
- reinforcing owners' responsibility and may deter some irresponsible owners from purchasing a dog
- tracing puppy farmed dogs back to their breeders
- providing successful prosecutions in relation to dangerous dogs legislation and dog attacks, by helping to identify both the dogs involved and their owners
- dealing with ownership disputes
- reducing incidents of dog theft

## How big a problem is unlicensed dog breeding in Wales?

The Companion Animal Welfare Enhancement Scheme (CAWES) data for dog breeding identifies nearly 2,000 establishments in Wales that are breeding dogs. The biggest growth in numbers is in the exempt category that is those operators/owners of breeding dogs that are exempt from requiring a licence as per the legislation.

Dogs Trusts believes that in addition to unlicensed, large scale puppy farms which are clearly already a huge problem, there is the potential for abuse of the system by those exempt from inspection that may be breeding 3 to 4 litters per year.