

P-05-939 Immediate embargo on new dog breeding licences, licence renewals and planning applications until regulations are fit for purpose and enforceable, Correspondence – Petitioner to Committee, 12.02.20



C.A.R.I.A.D. RESPONSE TO COMMUNICATION RECEIVED BY THE CHAIR OF THE PETITIONS COMMITTEE FROM LESLEY GRIFFITHS, MINISTER FOR ENVIRONMENT, ENERGY AND RURAL AFFAIRS

P-05-939

Dear Petitions Committee,

We thank you for considering our petition requesting an immediate embargo on new dog breeding licences, licence renewals and planning applications until regulations are fit for purpose and enforceable.

We launched this petition in response to the BBC One Wales documentary aired on Monday 30th September 2019 highlighting the appalling state of the licensed, legal, regulated puppy farming trade in Wales. We worked extensively with the BBC producer over 18 months providing evidence of the failures of the inspection process, the inconsistencies and inaccuracies of Council licensing inspection reports and the often disturbing guidance provided to the licensing inspectors (who are not animal welfare experts) by vets on the fitness of dogs to be bred from.

In addition, we have been providing such evidence to the Minister's own department supporting these failings for many years which have not been acted upon. In particular, we have cited areas where Councils are unable to enforce the current regulations by their own admissions and which have frustrated the process of prosecution. These areas include the staff:dog ratio and the socialisation and enrichment programmes.

I will now respond directly to the Minister's correspondence, paragraph by paragraph so that it is clear why this generic response that many people have now received from her office is so deeply disappointing and in many areas, extremely worrying. We believe it is imperative that members of the Petitions Committee are fully apprised of underlying issues in regards to the present crisis in puppy farming and puppy dealing in Wales.

"Animal welfare and the responsible ownership of animals are priorities for the Welsh Government and the Wales Animal Health and Welfare Framework Group. We are committed to maintaining high standards of welfare for all animals kept in Wales at all stages of their lives."

With all due respect, we wouldn't expect the Minister of any government to state anything to the contrary. It is however a statement that only has credence if there is concrete evidence

of these 'high standards' which at present there is not in the case of puppy farming, puppy dealing and dog breeding in Wales.

I had already committed to reviewing the Animal Welfare (Breeding of Dogs) (Wales) Regulations 2014 and also made clear on the value I see in banning third party sales of puppies and kittens.

Yes, the Minister has said this on a number of occasions over the last 2 years and was in fact a speaker at our Lucy's Law For Wales event at the Senedd on 11th July 2018. Since then she has also stated in television interviews that it is her desire to 'run puppy farming out of Wales'. In the meantime, England will be proceeding with this 3rd party ban from 6th April this year. Wales is already falling far behind its neighbours with Scotland, Northern Ireland and now Ireland having greater traction in this area than Wales.

Following the recent broadcast of a BBC Wales Investigation programme, I appreciate urgent action is needed in this area. With this in mind:

I accepted the offer of help from the Wales Animal Health and Welfare Framework Group and requested an urgent and immediate review of the dog breeding regulations. The work commenced in November and has recently concluded. Officials received the report on Tuesday and a decision how best to address the issues will be made following full consideration of the recommendations.

The Chief Veterinary Officer has met with Local Authority Chief Executive Officers to discuss barriers to enforcement. The Welsh Local Government Association was also represented. I have been advised the meeting was very productive and officials are considering the next steps.

The Chief Veterinary Officer immediately referred the BBC programme to the Royal College of Veterinary Surgeons.

Officials launched a social media campaign on the run up to Christmas, aimed at prospective puppy purchasers, highlighting the importance of sourcing responsibly.

It is alarming and distressing that it took a BBC One Wales Investigation – in effect a public shaming of the Minister's department - to prompt urgent action, when the very same issues have been shared with this Government time and again over many years.

We are extremely concerned that advice being given to the Minister on how to proceed may be coming from inappropriate sources. For example, The Wales Animal Health and Welfare Framework Group consists largely of representatives from the farming industry. And it is worth noting that the credentials of the key members of this group are as follows (taken from the group's website):

Abi Reader: Abi is a 3rd generation dairy farmer in South Wales and has been farming for more than 10 years. Abi manages a 750 acre farm which comprises of a mixed dairy herd of Holstein Friesians and Dairy Shorthorns. Abi was elected as NFU Cymru County chairman in 2014. Off the farm, Abi is involved in hosting farm open days and charity events.

Les Eckford: Les has spent most of his professional life in government veterinary service (1979- 2016), including within the Welsh Government as a veterinary adviser. Now retired, Les represents Wales as regional officer of the British Veterinary Association since 2017. He has extensive experience of engaging with a wide range of people, from farmers to senior policy makers and representatives of organisations, with diverse interests in animal health

and welfare. Les interacts with veterinary students to raise awareness of animal welfare needs in food production animals.

Chair: Stephen James was appointed as the chair of the WAHWFG in July 2018. His term of appointment is 3 years. He has a wealth of experience in the farming sector, held the position of NFU Cymru President for 2 terms, and was director and chairman of the successful farmers' cooperative.

David Davies, who runs a farming enterprise and property letting business. David is also chairman of the Welsh Advisory Board of NFU Mutual Insurance and former president of the Welsh Dairy Show and former Chair of Hybu Cig Cymru.

Moss Jones, director of the Welsh Agricultural Organisation Society and managing director of Quality Welsh Food Certification Ltd. Moss is also company secretary of Welsh Lamb & Beef Producers Ltd, Livestock Marketing and president of South Caernarfon Creameries.

Sara Carr: Current BVA Welsh branch president, Sarah graduated from Liverpool Veterinary School in 2004. Sarah went on to spend some time as a locum vet in her native Somerset before volunteering for a donkey and mule charity in Morocco. Once back in the UK, Sarah joined a rural mixed veterinary practice in Monmouthshire, where she gained experience in farm animal practice, before moving to Abbey Equine Clinic in 2009 to further develop her skills as an equine vet. Sarah also has a particular interest in modern equine dentistry and in 2014 passed her BEVA/BVDA exams. Outside of work, Sarah runs her own flock of crossbred commercial ewes, which keeps her in touch with the agricultural sector in Wales.

Ifan Lloyd, veterinary surgeon in clinical practice and a senior partner of a veterinary group with surgeries in Swansea and Neath. Ifan is the Welsh regional representative on the British Veterinary Association (BVA) Council.

Paula Boyden: Paula graduated from the Royal Veterinary College in 1992, spending 11 years in general practice before joining Intervet/Schering-Plough Animal Health as a veterinary adviser in 2003. She joined Dogs Trust as deputy veterinary director in June 2010 and became veterinary director in August 2011.

With all due respect, in what possible capacity is this group the most suitable or impartial to be considering what is best for domestic companion animals when it comprises those with experience and interests in livestock farming, food production, the NFU and even a dog charity that lobbied against the introduction of Lucy's Law in England?

It is worth noting that in previous years representatives from the NFU have spoken in favour of large-scale puppy farmers being granted licences despite our evidence showing that the welfare of the dogs involved would be compromised. Again, and with all due respect, why has the Minister not reached out to those who have the best interest of companion animals - dogs (and cats) at heart - and who are experts in the area of puppy farming and puppy dealing; Those who have worked tirelessly for over a decade at the coalface of the problem and know intimately how and where the system can be improved to ensure not only dogs (and cats) are at the heart of any 'welfare' strategy, but that Councils are able to fulfil their duties in terms of licensing and enforcement, and the public are protected? Surely collaboration is key to any such success?

Our concerns about the suitability of advice from this group have not been allayed having read the Wales Animal Health and Welfare Framework Implementation Plan 2019-20 where effectively just one page was devoted to a top line summary on 'Dog Breeding/Third Party Sales in a document that is 34 pages long and is predominantly focussed on issues

pertaining to livestock – e.g. cows, sheep, pigs and chickens, disease prevention and biosecurity.

The Committee will of course be aware that dogs are not livestock, but are domestic companion animals and as such that dog breeding is a complex and specialised area where an understanding of genetics and health testing is now playing a significant role in determining the health of breeding dogs and their progeny, as is the psychological health of breeding dogs in passing on a temperament that is suited to living in a family environment. It is just one of many reasons why dogs are not suitable to be 'farmed'. Equally it is disappointing that the focus on this small excerpt of the 2019-20 plan remains on the puppies and not on the welfare of the breeding dogs themselves. Even when these adult dogs are acknowledged with "appropriate retirement of breeding bitches" there is a failure to mention stud dogs.

What has become clear over the years is that there is now a very real need for the creation of a separate unit devoted to companion animal welfare issues rather than this being given cursory consideration through a department where the primary objectives are those of farming and agriculture.

In terms of the social media campaign launched by officials in the run up to Christmas, we appreciate the effort that was made to create such a campaign. However, in our opinion the contents fell short of having any significant value to the public and we cannot help feeling that perhaps in a rush to put something out there due to the urgency of the current situation, whoever provided the guidance to the Welsh Government for the content of this online campaign is not well-versed in the area of puppy farming/puppy dealing or how puppy buyers can truly protect themselves from those who are dedicated to profiting from animal suffering. The importance of seeking the best knowledge base for any future campaigns on this subject cannot be stressed enough and we remain at the service of the Welsh Government in that capacity should they wish to create a dialogue with us at any time.

The Welsh Government will continue to work with key stakeholders, including Local Authorities and the other Administrations to ensure we introduce changes which will have a lasting impact on the welfare standards of dogs and cats bred in Wales.

To date, C.A.R.I.A.D. – considered to be a key stakeholder in this area in other nations within the United Kingdom has not been consulted or contacted with a view to working with the Welsh Government. Our evidence, however, has been presented to the Task and Finish Group via our Associate Membership of the Companion Animal Welfare Group for Wales.

Any changes to the legislation or to enforcement must be proportionate and evidence based. Dog breeding is a legitimate business and the majority of breeders meet the required welfare standards.

It is true that any changes to legislation or enforcement must be evidence based. And that evidence has been provided over many years now. It is indisputable. It is also worth reminding the Minister that at the time of implementation of the 2014 (Breeding of Dog) (Wales) Regulations, a 12-month review of these regulations was promised. This was then pushed back to 2 years. Then 3 years. And now here we are in 2020 and we are expected to remain patient for action to finally be taken. During those wasted years the number of dogs and puppies that have suffered horrendous neglect and exploitation in Wales will never be known, but we do know that they have been and continue to be substantial in number.

There are approximately 260 licensed breeders in Wales and it would not be appropriate to implement a moratorium which would penalise lawful breeders for the actions of others.

In conclusion, only in the last sentence of the Minister's final paragraph is the subject of our e-petition acknowledged. Whilst there may be 260 licensed dog breeders in Wales, the overwhelming number of dogs being bred are coming from licensed puppy farms due to their high-volume nature. The Minister states that to implement a moratorium would penalise lawful breeders for the actions of others. We strongly disagree. It is in fact doing the smaller number of high welfare home breeders a huge disservice to continue licensing new puppy farms, renewing their licences or accepting planning applications from them when to do so under the current broken system only insures the suffering of breeding dogs and puppies to continue on such a large scale. There is a huge difference between a high welfare dog breeder and a high-volume puppy farmer. Continuing to accept puppy farming as in any way comparable to that of high welfare dog breeders is exactly what is penalising those individuals and ensuring that they cannot operate on a level playing field.

Our calls for an embargo are genuine and to put this into context, if a product is found to be faulty and to potentially be harmful, a company issues a recall of that product until it is 'fit for purpose'. Whilst we in no way compare sentient beings to 'products' – despite the fact that in law they continue to be considered commodities – we do believe the similarity of allowing the continuation of a failed licensing system that is proven to cause harm, is a relevant comparison and should not be dismissed.

If statements made by the Minister that the Welsh Government intends to act with urgency in this regard, an immediate embargo should be completely within the scope of acceptable action as it would cause little inconvenience to those breeders who are committed to high welfare standards. Our fear, however, is that despite all statements to the contrary, revised 'fit for purpose' regulations including the 3rd party ban on puppy and kitten selling (Lucy's Law) will not be laid in Wales until just prior to the Welsh Assembly elections in 2021. We and the Welsh public seek assurances to the contrary and urge the Petitions Committee to continue to press the Minister for confirmation of a firm date for the implementation of such legislation as a matter of urgency.

Kind regards,

Linda Goodman

Linda Goodman
Founder
C.A.R.I.A.D.

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