

**Royal College of Veterinary Surgeons Consultation Response – Welsh Assembly
Government Breeding of Dogs: The Animal Welfare (Breeding of Dogs) (Wales)
Regulations**

1. The following response is made on behalf of the Royal College of Veterinary Surgeons (RCVS). The RCVS is the regulatory body for veterinary surgeons in the UK. The role of the RCVS is to safeguard the health and welfare of animals committed to veterinary care through the regulation of the education, and ethical and clinical standards, of veterinary surgeons and nurses, thereby protecting the interests of those dependent on animals, and assuring public health. It also acts as an impartial source of informed opinion on relevant veterinary matters.
2. As a regulatory body, the RCVS will limit its comments to those areas where there are clear indications of relevance to the College's role and where the new policy may require the Welsh Assembly Government, the veterinary profession or the public to seek assistance from the College.
3. The RCVS welcomes the initiative taken by the Welsh Assembly Government to develop new Regulations on the Breeding of Dogs that are designed to be 'fit for purpose' and which take into account welfare requirements.
4. The RCVS has concerns regarding the fact that the primary triggering criteria for the licensing requirement is based on the ownership or keeping of three breeding bitches and considers that this could be open to abuse. Under this proposal, for example, it appears possible that numerous bitches could be kept in separate kennels on a single premise without triggering the need for a licence, so long as the ownership of the bitches could be linked to separate individuals. The RCVS would therefore propose that the licensing requirement should be based on the number bitches at a premise and not who owns or is keeping them. It should be noted, however, that should this approach be adopted it would be necessary to define precisely what is meant by premises so as to ensure, for example, that outbuildings or sheds were not deemed separate premises.
5. The RCVS has significant concerns relating to the proposed ratio for a maximum of 20 dogs allowed per full time attendant and up to 10 dogs allowed per part time attendant. The College notes that there is perhaps no other species in which there is such a variation of size and temperament between the various breeds. Consequently, whilst one attendant might be able to attend to the needs of 20 dogs of one particular breed, one attendant could be grossly inadequate to attend to the needs of 20 dogs of a different breed. It is also unclear as to whether the ratios refer to attendants present at any one time and directly caring for the dogs or whether they refer to overall staff levels. If the ratios refer to the latter then they appear inadequate. The College considers that the Welsh Assembly Government must provide clarity as to how these ratios are intended to be interpreted and consider developing lower ratios for certain breeds of dog. Furthermore, the College considers that any attendants should be competent and have undergone appropriate training. Standards for such training should be developed

with the advice of the veterinary profession and at levels specified by the relevant Sector Skills Council, Lantra.

6. The RCVS strongly supports the proposal that all puppies should be microchipped before being sold or homed and details referenced to the breeding bitch. The College also supports the proposal that microchips should be registered to the breeder before the puppy moves off the premises. Microchipping puppies, in this way, prior to sale could assist in identifying where dogs were bred and help to reduce the poor breeding practices that can lead to inherited defects and diseases. Furthermore, the 'indelible identification' of all puppies by 'microchip or other such equivalent system as may be developed' was one of the recommendations of the Independent Inquiry into Dog Breeding (2010) led by Professor Sir Patrick Bateson.
7. The RCVS is aware that poorly implanted chips can lead to severe injuries during implantation and increased risks of microchip migration. The College therefore considers that appropriate standards of training for those charged with implanting microchips must be developed, through a process of thorough consultation with the veterinary profession.
8. The Advisory Council on the Welfare Issues of Dog Breeding is a recently established independent, non-statutory advisory body, created to provide independent, expert advice and to make recommendations on methods and priorities for improving the welfare of dogs used for breeding and their offspring, with particular regard to: surveillance, research and development; breeding strategies; legislation and regulation; and education and publicity. The RCVS has reviewed the final response of the Advisory Council to the Welsh Assembly Government consultation on Breeding of Dogs and the College lends its broad support to the Council's recommendations.
9. If clarification on the above comments is required, please do not hesitate to contact the College. Representatives from the RCVS would be happy to meet with officials and ministers to discuss and expand upon this statement.

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