



THE KENNEL CLUB

Making a difference for dogs

Mrs A Roberts
Basset Hound Club of Wales
2 Melin Street
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16th December 2010

Dear Mrs A Roberts.

Re: Welsh Assembly Draft Regulations on Breeding of Dogs

I am writing regarding draft regulations recently issued by the Welsh Assembly on the breeding of dogs. As you may already be aware the Welsh Assembly established a Dog Breeding Review Group some months ago. The Group was tasked with looking at existing regulation and formulating recommendations to protect and improve the welfare of puppies, breeding bitches and stud dogs.

I am therefore contacting you to inform you of the Kennel Club's own stance on these draft regulations and to kindly ask that you respond to the consultation. The regulations could have a huge impact on the future of dog breeding in Wales and it is therefore vital that your views on these proposals are considered. Consultation documents and information can be found on the Welsh Assembly website at www.wales.gov.uk/animalwelfare or by emailing companionanimalwelfare@wales.gsi.gov.uk.

The Kennel Club agrees with the intentions of the Welsh Assembly in bringing forward revised regulations, and with many of the provisions these contain, for instance, the requirement on breeders not to mate bitches under the age of one. We are also pleased to see a limit on the number of matings of one bitch over a lifetime, which we believe is a more important factor than the number per year. The Kennel Club recently announced a decision to ban registrations of more than four litters from one bitch from 2012, which we believe is in the best interests of breeding bitches.

However, we remain concerned that the best, most welfare conscious and reputable breeders will be negatively affected by the introduction of excessive regulation. Striking a balance which ensures irresponsible breeders are driven out of business while good breeders are still able to operate is therefore absolutely essential to the effectiveness of the new regulations.

Our main concerns with the proposed regulations are as follows:

- The number of breeding bitches being the best for when licensing should kick in. We believe the number of litters should be the trigger. This approach would allow the limited resources of those enforcing the regulations to be targeted at those breeding large.



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numbers of puppies and more likely to contravene regulations, rather than at small scale hobby breeders.

- The requirement to provide two water bowls in quarters with more than one dog. If followed this would be inadequate to deal with cases of tens of dogs and is overly prescriptive in regard to small numbers of dogs.
- Ratios of staff to dogs. These, are, again, too prescriptive and fail to take into account the breed, temperament or size of dogs concerned and the capabilities and fitness of the staff in question.
- The requirement to vaccinate against Canine Distemper, Infectious Canine Hepatitis, Leptospirosis and Canine Parvovirus. The full vaccination course takes 12 weeks, which could lead to a break in the course or mean that a new puppy owner has to start a course all over again. Breeders should therefore be allowed some discretion over whether or not to start the course of vaccinations or leave this to the new puppy owner. Stating that breeders of crossbreeds should have 'due regard' to the breeds' compatibility. This is far too open to interpretation and therefore somewhat meaningless.
- The requirement to microchip before re-homing or selling puppies. Whilst we agree with this stance in principle, some breeders will be concerned at the potential consequences and practicalities of microchipping puppies so young.

We also believe the regulations could go further in some respects by stipulating that breeders:

- Health test the breeding bitch and stud dog for any genetic disorders relevant to the breed such as hip or elbow dysplasia and inherited eye diseases.
- Provide written advice on feeding and worming, socialisation and training, specific to the needs of the particular breed:
- Provide reasonable post-sales advice to the puppy buyer; and Draw up a contract of sale to protect the buyer and seller.
- These changes would provide even stronger protection for the puppy buyer, ensure the immediate welfare needs of the puppy are met and help to prevent inherited diseases being passed on, thus improving the long term health of those breeds affected.

I would be very grateful if you would respond to the consultation in support of our stance. We feel it is vital to strike the right balance of stopping puppy farming practices whilst not also penalising reputable and responsible breeders. If you would like to discuss this further then please do not hesitate to contact me on 020 7518 1020 or at victoria.brown@thekennelclub.org.uk.

Yours sincerely



Victoria Brown
Senior Public Affairs Officer