THE BASSET HOUND CLUB OF WALES

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Animal Welfare and By-Products Branch Office of the Chief Veterinary Officer Welsh Assembly Government Cathays Park Cardiff CF10 3NQ

Re: Animal Welfare Breeding of Dog Regulations 2011

Dear Sir or Madam,

Many of the proposed regulations are sensible and if enacted, might well improve the well-being of dogs in Wales however, one of our concerns is the problem of enforcement. Would this lie with the dog wardens? Farther it is possible in the current economic climate that enforcement might be subject to cuts and it could be that responsible breeders would be deterred by the £500 increased licence fee.

Much irresponsible breeding takes place in obscurity, in barns and even in cages under tarpaulins. Puppies are hard to locate. Many of these puppies because of health and temperament problems eventually burden rescue organisations throughout the UK.

In our breed in Wales the Basset Hound is particularly affected by commercial irresponsible breeders who greatly outweigh the very few responsible ones who may only have one litter in three years. This may be because of its appealing Disney like qualities of the breed. The Kennel Club established 15 breeds considered less healthy than others the Basset Hound is one of them responsibility for this must fall on those irresponsible commercial breeders. All responsible breeders of Basset Hounds in Wales are members of the Basset Hound Club of Wales and observe our Code of Ethics. This has been recently updated and is exacting.

We endorse the concerns expressed by the Kennel Club

- The number of bitches being the test 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 those breeding large 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 again are 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 crossbreds should therefore have 'due regard' to the breeds compatibility. This is far too open to interpretation and therefore somewhat meaningless.
- The requirement to microchip puppies before re-homing or selling puppies. Whilst we
 agree with the 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 that particular breed.
- Provide reasonable post-sales advice to the puppy buyer; and
- Draw up a contract of sale to protect the buyer and seller.

Many members of the Basset Hound Club of Wales already comply with these four strictures unreservedly.

Yours sincerely

Mrs. M.R. Nixon (President)

Mrs. M.E. Brown (Chairman)

Mrs. A. Roberts (Secretary)

Mrs. C.M. Watkins (Treasurer)