



**The Association of
Veterinary Surgeons
Practising in Northern Ireland**

John Johnston
President, 2012 - 2013



**North of Ireland
Veterinary Association**

A Division of the British Veterinary Association
Bert Allison
President 2012-2013

Mr. Paul Frew MLA,
Agriculture and Rural Development Committee,
Room 359-H,
Parliament Buildings,
Ballymiscaw,
Stormont,
Belfast
BT4 3XX

1st October 2012

Dear Sir,

THE WELFARE OF ANIMALS (DOG BREEDING ESTABLISHMENTS) REGULATIONS [NORTHERN IRELAND] 2012

Thank you for giving representatives of the North of Ireland Veterinary Association, the Association of Veterinary Surgeons Practising in Northern Ireland the opportunity to contribute to the stakeholder event held at Stormont on 18th September.

We would like to reiterate some of the points made during the feedback session, namely:

1. Exemptions from the Regulations

We believe that the same welfare standards should be applied to all types of kennels, whether these were commercial breeders premises, hunt kennels, greyhound breeders, local authority pounds and rescue/re-homing kennels. It must be said that animal welfare charities will not intentionally have bitches whelping on their premises and so will probably be exempt from the Regulations anyway. If animal welfare charities do find themselves in the position of having to register due to rescuing pregnant bitches, it is our opinion that their huge contribution to animal welfare in NI should be recognized though a reduced fee or perhaps no fee at all, however they should still be inspected as per the regulations.

2. Castration/Spaying

The draft regulations include a proposal that all dogs no longer required for breeding should be spayed or castrated prior to being re-homed, unless in the opinion of a veterinary surgeon such surgery would be inadvisable on health and welfare grounds. While at first glance wholly admirable, we endorse the views of our colleagues in the Society of Greyhound Veterinarians that neutering of older dogs is not the same, comparatively routine procedure as neutering younger bitches of six or nine months of age. The exemption from the requirement to spay where there are underlying health conditions which may increase the risk of complications in the older bitch is therefore an essential part of this legislation. It therefore follows that it is also essential that each case must be assessed by a veterinary surgeon before re-homing can be progressed.

We acknowledge that it is already very difficult to re-home older dogs once they have finished breeding and the requirement to spay adds an extra cost which is likely to result in more breeders choosing to euthanize



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rather than spay/re-home. Whilst humane euthanasia is not a welfare issue in itself, the veterinary associations see it as an undesirable and unacceptable method of addressing the issue of unwanted dogs.

3. Fees

Any place where there are more than two bitches being used for breeding should be licensed, using a sliding scale of fees on a per head basis rather than a two-tier system as currently proposed (under or over 100 bitches).

4. Compliance and monitoring

The legislation as proposed misses some opportunities for monitoring which would support the annual checks on registered premises. These include:

- a. linking the microchip number of a breeding dog to the chip numbers and date of registration of all her puppies and there by accurately monitoring how many litters a dog has.
- b. ensuring that the microchips are registered to the address where they are kept, an obvious method to ensure that the number of bitches at each location is controlled.
- c. Advertising of puppies for sale - we would recommend that registration no. of registered breeders should be included in all advertisements for puppies. This, coupled with a campaign of educating the public on what to look for from a breeder, should help to identify those operating outside the legislation

5. Genetic defects

Another missed opportunity is the lack of provisions concerning line breeding or genetic testing. We accept that these are complex issues and recognize that there may not be enough knowledge readily available to address this in an affordable way at this stage, but feel that there should be a clause allowing the introduction of breeding controls to avert genetic defects when the knowledge becomes more widespread. The irresponsible and inappropriate breeding of pedigree dogs probably results in more welfare complications for dogs in the developed world than any other factor – any welfare legislation that fails to address this is flawed.

6. Whelping Facilities Socialisation Programme

The legislation should require that this should be documented in a written protocol for each facility, the actual implementation of which can be examined carefully by inspectors and assessed for effectiveness. Inadequately implementing the written protocol should be grounds for enforcement action. Ideally there should be a Code of Practice which outlines best practice guidelines, acknowledging that pups should be allowed to express normal behaviour and that “normal” behaviour is different for different breeds. Breeders must understand that the socialisation period is when puppies most readily form nonspecific bonds, with both people and other animals (Serpell and Jagoe, 1995). For puppies to develop appropriate behavioural responses as adults they should be introduced to conditions that they are likely to experience as adults. This should be carried out during the socialisation period (3-12 weeks of age). Puppies aged between 6 and 8 weeks form social relationships more readily with humans. With increased deprivation of appropriate human contact during the socialisation period comes increased risk of puppies developing fearful responses to humans in the future.

7. Veterinary Care

In addition to the vets’ own records, breeders should keep log books documenting all treatment of animals in kennels.

Yours sincerely,

