



Afghan Hound Society of Northern Ireland

To All Members of DARD Committee

Please find attached further comments on
THE WELFARE OF ANIMALS (DOG BREEDING ESTABLISHMENTS AND
MISCELLANEOUS AMENDMENTS) REGULATIONS (Northern Ireland) 2012.

These are the result of the information gathering exercise held on Tuesday 18th
September 2012.

I hope you find them informative and useful.

It appears to me that these regulations are still in need of some amendments for them
to adequately support the intentions of DARD.

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Hon Sec

THE WELFARE OF ANIMALS (DOG BREEDING ESTABLISHMENTS AND MISCELLANEOUS AMENDMENTS) REGULATIONS (Northern Ireland) 2012.

PART 1 INTRODUCTION

Interpretation; Para 2

The descriptions of 'breeding establishments' remain unclear and open to interpretation. Any document wishing to be enshrined in law should be completely unambiguous

It may be that hunt clubs breed infrequently and rarely sell their puppies. However, it would seem reasonable to expect the conditions of these breeding bitches to be covered by the same regulations as for other breeding establishments. It is the welfare of the bitches which is under consideration.

PART II ISSUING OF LICENCES Fees (8)

There is still no acceptable rationale for the scale of fees suggested. It is unlikely that any at the lower end e.g. 3 breeding bitches is operating their 'breeding establishment' as a business, whereas someone with over 200 bitches almost certainly is. It is therefore appropriate to amend the scale of fees to ensure that businesses pay at least an equal amount per bitch as the smaller breeder.

It should not be up to small breeders to carry the brunt of the costs.

SCHEDULE 1

This contains a requirement to say how many dogs other than unneutered bitches are on the premises. There is no indication anywhere why this information is required or to what use it will be put.

SCHEDULE 4

CONDITIONS 4,5,AND 6. These should be covered by some form of 'best practice guidelines' rather than being detailed in this way. Please note this in one example of why the inspectors need to be adequately trained.

CONDITION 8

The changes made to this with regard to the age and numbers of litters does not appear to take the welfare of the bitch into account.

- (a) The reference here to 12 months does not tally with the reference to 6 months in the Interpretation section. It should remain at 12 months.
- (b) This should continue to say 1 litter per year. 3 litters in 3 years could in effect mean a bitch having 3 litters in 18 months. Hardly due regard for the bitch's welfare.
- (c) From January 2012 the KC reduced the number of litters it would register from one bitch from 6 to 4. It would seem reasonable for these Regulations to follow suit.
- (d) The KC will not register pups born to a bitch over 8years old and there is no good reason given for departing from this age restriction. Just because greyhound bitches can be raced until they are 6 years old doesn't mean they have to be.

CONDITIONS 9 AND 12 There is confusion herewith regard to way in which puppy ages are described, one in days and one in weeks e.g. 56 days, and the other 12 weeks or 8 weeks from January 2013.

**DOG BREEDING ESTABLISHMENTS:
GUIDANCE FOR COUNCIL ENFORCEMENT OFFICERS**

What standing, in law, does the Guidance have when it is being used to 'enforce' the Regulations?

General comments.

The term 'inspector' is used throughout this document. Anyone in the category of inspector must have adequate training. They must also carry identification and must be completely au fait with all the requirements of the Regulations.

It is not explained anywhere what the relationship will be between these inspectors and the current Dog Wardens. Nor is it clear what the relationship will be between inspections for the purposes of issuing a block licence and those required under these new regulations. Will a kennel, for example, having 3 breeding bitches and a number of other dogs need both? If not how is the welfare of the non-breeding bitches monitored? If two separate inspections are required will these be by two different inspectors?

It is not made clear anywhere what the time scale will be between an application for a licence and an inspection. Will the inspection be unannounced?

If there remained an upper limit of 8 years on mating bitches then a kennel could have more than 3 unneutered bitches but would not be regarded as a 'breeding establishment' if some of the bitches were over 8 years.

Why do these regulations not recognise, as does the KC, a puppy as being up to 12 months old?

Any kennel registered with the KC Assured Breeders' Scheme should be automatically granted a licence under these regulations.

It is vitally important that the public understand what different licences imply.

With regard to the initial appeal being now made to the Council it is vitally important that this appeal is independent. No Council member involved in the initial refusal of the licence should be involved in the appeal hearing.

The removal of any reference to line breeding or genetic testing should remove the requirement for DNA sampling. If this is to remain it must be carried out by a trained expert not just the inspector.