

**THE
CONSULTATION
ON AN
ANIMAL WELFARE BILL**

AN ANALYSIS OF THE REPLIES

**Branch E
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DEFRA
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Introduction

The period for the consultation on an Animal Welfare Bill ran from 2 January to 30 April 2002. The document contained a number of discussion points.

We received a total of 2,351 replies to the consultation. This figure is comprised of:

- 1,986 letters from the public
- 113 letters from dog breed societies
- 43 letters from bird clubs
- 29 letters from individual veterinary surgeons
- 13 petitions
- 167 letters from animal welfare organisations, commercial interests, academics, the police and representatives of central and local government.

The purpose of this analysis is to provide a presentation of what people said in their replies. The statistical information is taken from the views of those individuals and organisations that wrote to DEFRA. The figures are therefore of limited value and should not be interpreted as a scientific analysis of the views of a cross section of the public opinion in England and Wales.

Most of the replies from the public concentrated on single welfare issues and did not comment on all the discussion points in the consultation document. The docking of dog's tails was the issue that generated most interest.

Many members of the public used standard drafts that were provided by pressure groups. The analysis has identified those replies that made use of standard drafts.

The analysis of the replies from the public has compared the replies that we received from rural and urban areas and there does not appear to be any significant difference in their views.

The replies from the welfare organisations etc. have been grouped according to their particular area of expertise.

CONSULTATION LETTER ON AN ANIMAL WELFARE BILL

Introduction

1. Ministers wish to consider whether to introduce an Animal Welfare Bill to consolidate and bring up-to-date the legislation that exists in England and Wales to promote the welfare of farmed, domestic and captive animals. The purpose of this consultation is to find out what you would like to see included in such a Bill. The consultation does not seek to deal with the issue of hunting with dogs, animals in zoos, dangerous and unruly dogs legislation or the Council of Europe Convention on Pet Animals and we are not seeking views on them in this consultation exercise. Nor does it seek to deal with the welfare of animals in scientific research: that remains a Home Office responsibility.

The legislation that is being reviewed

2. This review is concerned only with legislation, which might apply to animals kept by man for enjoyment, sport, companionship or farming purposes. There are separate consultations underway on the Dangerous Wild Animals Act and also in implementation of the Zoos Directive. Please also bear in mind that much farm animal welfare ground is covered by EU legislation.

3. The general principles of animal welfare are set out in the Protection of Animals Acts. The first Protection of Animals Act was passed in 1911. Since then there have been nine amendments to the Act. The Act covers domestic or captive animals. This includes farm animals. The Act makes it an offence to cause any unnecessary suffering to an animal.

4. Although the Act has been amended over the last 90 years it remains in many respects a product of the nineteenth century. This is reflected in the prominence that it gives to such things as forbidding the use of dogs for draught purposes (pulling carts, carriages etc) and the regulation of knacker's yards.

5. The laws protecting domestic or captive animals that we are specifically looking to consolidate and modernise are:

- Protection of Animals Act 1911
- Performing Animals (Regulation) Act 1925
- Pet Animals Act 1951
- Cockfighting Act 1952
- Abandonment of Animals Act 1960
- Animal Boarding Establishments Act 1963
- Riding Establishments Acts 1964 and 1970
- Breeding of Dogs Acts 1973 and 1991
- Protection Against Cruel Tethering Act 1988
- Breeding and Sale of Dogs (Welfare) Act 1999

Why consolidate and modernise the legislation?

6. Since 1911 there has been an increasing public awareness that an animal does not suffer solely as the result of physical abuse caused by deliberate acts or neglect. There is equal concern about the quality of an animal's life and the need to have in place legislation that provides for animals' physiological and other needs.

7. Although it is felt by at least some animal welfare organisations that these needs have to an extent been addressed in the laws now in place for farm livestock, animals in transit, animals in scientific research and zoological collections, there appears to be a belief that the legislation for domestic or captive animals remains confusing, unwieldy and outdated.

8. The DEFRA ministerial team considers that these concerns need to be addressed and that there is considerable scope to modernise and improve the legislation. Following the creation of DEFRA most of the animal welfare laws are now under one roof. This provides a unique opportunity to make progress towards the consolidation and modernisation of these laws. We wish to start this process by consulting widely with organisations and individuals about the welfare of domestic or captive animals. This will give us the opportunity to hear what changes you would like to see.

What types of issues do we expect to be raised in the consultation?

9. We want the consultation on domestic or captive animals to be as wide ranging as possible and, apart from hunting, the control of dogs, the use of animals in scientific research and the Council of Europe Convention which are excluded, no limits have been set to the areas that can be suggested as suitable for inclusion in the Bill.

10. The other issues that have recently featured in correspondence to DEFRA from animal welfare organisations and the general public and on which we would expect to receive comment include:

Animals in circuses

- Should there be a licensing system for circus winter quarters? What provision should be made for animals performing in circuses?

Pet fairs

Should there be greater regulatory control over public and private pet fairs?

Pet shops

Should the minimum age at which children can buy pets be raised?

The welfare of captive pheasants that are being bred for sport shooting

Does the existing law provide adequate protection?

Keeping exotic or dangerous animals as pets

In recent years there has been an increase in the number of exotic or dangerous animals kept as pets. Sometimes their owners do not understand the type of care that these animals need or that they have the potential to inflict serious injury or cause illness. Should there be greater controls over the buying and selling of exotic or dangerous animals?

Tail Docking

Should the docking of tails be banned?

The creation of a new offence of 'likely to cause unnecessary suffering'

Does the requirement in the 1911 Act to show that an animal has suffered before an offence is committed meet present day needs?

Increasing the powers available to the police when investigating allegations

Should the powers of entry, search and seizure in the 1911 Act be extended or changed?

Powers of arrest

Should the power of arrest in the 1911 Act be extended to include a person who, without reasonable excuse, is present when animals are placed together for the purpose of fighting each other?

Increased sentences

Are the maximum sentences provided for in the 1911 Act adequate?

Increasing the time allowed for proceedings to be brought before a court

Should the time allowed in the 1911 Act for proceedings to be brought before a court be increased from six months to two years?

Providing the Secretary of State with the power to make Codes of Recommendation to promote animal welfare

Should the Secretary of State be empowered to make Codes of Recommendation to cover issues such as the tethering of horses or the care of exotic animals?

Animal sanctuaries

Should animal sanctuaries be licensed?

Livery Stables/Yards

Should Livery stables/yards be licensed?

Using electronic prods for training

Should electronic prods be banned?

The mis-use of bio-technology in animal breeding

Science now makes it possible to produce genetically modified animals. This may be necessary for scientific research or medical purposes. However, should it be an offence for breeders to produce an animal which will not be used for scientific research or medical purposes that is likely to be genetically defective in some way?

11. This list is not exhaustive and the topics have not been placed in any order of priority.

Who is being consulted?

12. This letter is being sent to animal welfare organisations, representatives of those who use animals for commercial purposes and representatives of local authorities, the courts and the police. A list of the organisations that are being consulted is at the end of this letter. The list of consultees is not exhaustive - we welcome comments from anyone. If there is any organisation that is not included on the list that you think would like to contribute then please make them aware of this letter. The letter will also be placed on the DEFRA web site.

When is the Animal Welfare Bill likely to be considered by Parliament?

13. The purpose of this consultation is to seek views on what an Animal Welfare Bill could cover. It is therefore the first step in a lengthy process. The comments that we receive in response to this consultation will be analysed and assessed. Ministers will then decide on whether to proceed and, if so, a draft Bill will be prepared.

Comments

14. Comments on the proposals or any questions that you want to make should be addressed to Phil Alder, Branch F, Animal Welfare Division, DEFRA, room 606, 1A Page Street, London SW1P 4PQ. Telephone: 020 7904 6756, Fax: 020 7904 6961 or email AW_Consultation@defra.gsi.gov.uk. Responses should be sent to Branch F by no later than **30 April 2002**.

15. Representative groups when replying should provide a summary of the groups and organisations they represent.

Confidentiality

16. Responses may be made public unless confidentiality is specifically asked for.

ANIMAL WELFARE DIVISION
2 JANUARY 2002

List of consultees

Contact

Mr Graham Moore
Ms Maureen Puvis OBE
Stephen Edge
Mr Les Ward
Mr David McHattie

Mr A Tyler
Mr J W Dearden (Chief Executive)

Dr Robin Pellow

Ms Marjorie Johnson
Ms Pauline Baines

General Secretary

Director, Research of Health
Mr J Hallmark
Ian Cawsey MP (Chairman)

Mr P J Hooper (Secretary)
Roger Hancock
Mr D Green

Mr G Glendell

T Adorian

Ms Ginette Elliott
Sue Hopgood

Mr G Thomas, Chief Executive
Mr D Baglin

Ms J Holah
Mrs Janet George
A Robinson

Lynn Moran

Mr Blythe

Ms L Lodge

Association

-
-
ADAS
Advocates for Animals
Alexander Associates
Angus Council
Animal Aid
Animal Care & Equine Training Organisation
Animal Defenders
Animal Health Trust
Animal Welfare Trust
Animals in Medicine Research
Anti-docking Alliance
Arab Horse Society
Assoc of Chief of Police Officers
Assoc of Circus Proprietors
Assoc of Medical Research Charities
Assoc Parliamentary Group for Animal Welfare
Assoc Parliamentary Group for Animal Welfare
Assoc. of British Riding Schools
Association for the Study of Reptilia and Amphibians
Association of County Councils
Association of District Councils
Association of Metropolitan Authorities
Association of Show & Agricultural Organisations
AWSELVA
Battersea Dogs Home
Beddington Park
Birds First
Blue Cross
Bransby Home of Rest for Horses
Brit Miniature & Toyhorse Society
British Assoc for Shooting & Conservation
British Assoc. of Equine Societies
British Bloodstock Agency (UK) Ltd
British Council of Docked breeds
British Dog Breeders Council
British Falconers' Club
British Goat Society
British Greyhound Racing Board
British Hamster Association
British Herpetological Society
British Horse Driving Trials Assoc.
British Horse Society
British Horse Society
British House Rabbit Association
British Lipizzaner Horse Society
British Palomino Society
British Percheron Horse Society
British Rabbit Producers Assoc.
British Show Hack, Cob & Riding Horse Assoc.
British Show Jumping Assoc.
British Skewebald & Piebald Assoc.

Miss M Pollard	British Small Animal Veterinary Assoc
Ms C Nicholls	British Sports Horse Registry
Mrs Rachel Boer (Sec. & Tres.)	British Spotted Pony Society
Mr E Marriage	British Veterinary Association
Derek Lyons, Administrative Director	British Waterfowl Association
W Lainchbury MRCVS	British Wildlife Management
C Brewin	British Zoo Veterinary Society
Ms Michelle Thew	Brooke Hospital for Animals
Mrs M Story	Brooklands Livery Stables
Dr J Guise	BUAV
Mr Andy Ottaway	Bulldog Club Inc
Ms Diane Westwood	CAMBAC JMA Research
	Campaign Whale
	Captive Animals Protection Society
	Caspian Pony Society
Mr Derek Conway	Cats Protection League
Ms Judy Bernstein	Cats Protection League
Mrs Linda Porter	Central Committee of Fellpacks
Mr Lou Leather	Chartered Institute of Environmental Health
	Chartered Institute of Environmental Health
Miss Val Jennings	Chinese Crested Club of GB
	Chipperfield Organisation
	Cleveland Bay Horse Society
Ms L Amor	Coloured Horse and Pony Society UK
Secretariat	Companion Animals Welfare Council
Mr Peter Stevenson	Compassion in World Farming
Mr Madron Seligman CBE	Conservative Animal Welfare Group
	Council of Docked Breeds
	Country Land & Business Association
	Countryside Alliance
	Curragh Bloodstock Agency Ltd
Mrs J Ashby	Dales Pony Society
	Dartmoor Livestock Protection Society
K Locke	Dartmoor Pony Society
	Devon Horse & Pony Sanctuary
	Dog Breeders Assoc
	Dogs Aid (assistance in disability)
	Domestic Poultry Keepers Federation
	Donkey Breed Society
Mr E D Svendsen, MBE	Donkey Sanctuary
Mr David Coulthred	Doris Day Animal League
Ms C Thomas	Earthkind
	English Connemara Pony Society
Ms Debbie Bell	Env Investigation Agency
Tony Hunter	Environmental Services Department
Mr Nicholas Hamilton	Equestrian Support Services
Mr T Young	Eriskay Pony Society
David Wilkins	Eurogroup for Animal Welfare
Glen Fern	Exmoor Pony Society
Secretariat	Farm Animal Welfare Council
	Farmers Union of Wales
	Farriers Registration Council
Mr Ken Jones	Federation of Welsh Packs
	Feline Advisory Bureau
Mrs J Slattery	Fell Pony Society
Ms V Moore	Fight Against Animal Cruelty in Europe (UK)
Mr Gerard Duve	FRAME

Ms S Wakely	Friends of British Horse Society
N J Durnford	Gloucester County Council
	Goat Advisory Bureau
	Governing Council of the Cat Fancy
Ms Annette Crosbie	Greyhounds UK
	Guide Dogs for the Blind Assoc
Mrs D Hicketts	Hackney Horse Society
The Secretary	Hawk Board
Mr D Burchill	Highland Pony Society
	Horse Driving Trails Group
	Horse Rescue Fund – English Cottage
	Horse Society Endurance Riding Group
Ms Betsy Dribben	Humane Society International
Ms Sue Rhodes	Humberside police
Administration	Institute of Trading Standards
Ms Lynda Freebey	Int League for the Protection of Horses
	Internat Fund for Animal Welfare
	International Air Transport Association
Mr Simon Pope	International Farm Animal Welfare
	International Sheep Dog Society
Mr D C Taylor, BVMS, FRCVS	International Zoo Veterinary Group
Andrew Greenwood	International Zoo Veterinary Group
John Amsden	Isle of Wight Animal Preservation & Action Grp.
	Justice for Dogs
Ms Caroline Kisko	Kennel Club, The
	Lacots
Mr A Chipperfield	Lawyers for Animal Welfare
Mr Douglas Batchelor	League Against Cruel Sports
	Lluest Horse and Pony Trust
Ian Soukles	Local Government Association
	Lulworth Equestrian Centre
	Magistrates' Association
	Masters of Foxhounds
T P Wilde	Masters of Minkhounds Assoc
	NASDU
Graham Venn	National Animal Health & Welfare Panel
Mr Brian Abbott	National Animal Welfare Trust
Ms Jan Creamer	National Anti-Vivisection Society
Robert Foster (Chief Executive)	National Beef Association
Jemina Parry-Jones	National Birds of Prey Centre
Mrs Clarissa Baldwin	National Canine Defence League
Brian Hughes, Administrator	National Council for Aviculture
Joe Clarke	National Dog Wardens Assoc
	National Equine Welfare Council
	National Fancy Rat Society
	National Farmers Union
	National Farmers Union of Scotland
Dr Elaine King	National Federation of Badger Groups
Mr F Melville, Chief Executive	National Greyhound Racing Club Ltd
The Employers Secretary	National Joint Council for Local Authorities
Mr Roger Cook	National Office of Animal Health
Steve Dawson	National Office of Animal Health
Ann Peterson	National Pig Association
Mrs P Campbell	National Pony Society
John Thorley	National Sheep Association
	National Working Terrier Federation
Mr C S Green	Naturewatch

Ms S M Whitehead	Neuroscience Research Centre
Mr Mark Johnson	New Forest Pony Breed & Cattle
Keith Davenport	North Kent Animal Welfare Group
Ms Penny Lewis (Researcher)	Ornamental Aquatic Trade Assoc (OATA) Ltd
Lady Fretwell	PAIN
	Parrot Society UK
	Passport for Pets
	PDSA
Mr Jonathan Drake	Peden Bloodstock Limited
	Pet Advisory Committee
	Pet Care Trust
	Pet City
Mr Brian Owen	Pet Health Council
	Pets As Therapy
	Pets at Home Ltd
Dr R Ryder	Police Federation of England and Wales
	Political Fund for Animal Welfare
Mike Clark	Ponies Ltd & Ponies Promotions of UK
Mr Mike Finlay	Poultry Club of Great Britain
	PRO Dogs
	Protester's Animal Info Network
	Quarantine Kennel Owners Assoc
	Rabbit Charity
J Lovell	Racehorse Thoroughbred Training Board
Mr J Cunningham, Chairman	Raptor Rescue
Mr R Westcott, Chief Equine Welfare Officer	Redwings Horse Sanctuary
	Remus Horse Sanctuary
Dr Mark Matfield	Research Defence Society
Mr Mark Glover	Respect for Animals
Mr R Taylor's	Riding Est'ment
	Royal College of Veterinary Surgeons
The Registrar	Royal Veterinary College
Mr G Thompson	RSPB
Major General Peter Davies CB	RSPCA
K E Gaymer	S Gaymer Ltd
	Safeways
	Scottish Kennel Club
	Scottish Landowners' Federation
Major T P Wootton	Secretaries of Foxhounds Association
Mr A Blake	Seriously Ill for Medical Research
	Shetland Pony Stud-Book Soc
	Shire Horse Society
Chief Trading Standard Officer	Shropshire County Council Dept. of Trading Standard
	Side Saddle Association
Mr B Waynforth	SmithKline Beecham
	Society for Companion Animal Studies
	South-West Bloodstock Ltd
	Sport Horse Breeding of Great Britain
Miss A Southgate	Spotted Horse & Pony Society
	SSPCA
	Suffolk Horse Society
Mrs E Cabrol	Surrey Action for Equine
	The Born Free Foundation
Peter Suddock	The British Association of Leisure Parks, Piers and Attractions
	The British Horse Industry Confederation
	The Circus Society

Mary Talbot Rosevear	The Federation of Zoological Gardens of Great Britain and Ireland
Dr P Webbon	The Jockey Club
	The Pony Club
Mrs M Kennedy (Director & Studbook Manager)	The Scottish Sports Horse
Mrs E Blazak (Hon Sec)	The Standard & Trotting Horse Assoc of GB & Ireland
	Thoroughbred Breeders Association
Peter Crofts	UKROFS
James Kirkwood	Universities Federation for Animal Welfare
Mr Stephen Philpott	USPCA
Dr Alan Long	Vega
Ms J Gallattley	Vegetarian International Voice for Animals
Ms Sue Westwood	Verderers of the New Forest
J Fletcher MRCVS	Veterinary Deer Society
	Wandle Valley Wildlife Hospital Trust
President Douglas Morgans	Warren Hill Stabling & Lairage
	Welsh Hawking Society
Mrs S Horn	Welsh Pony & Cob Society
Mr J Barrington	West Wales Animal Aid
Dianne Pirrie	Wildlife Network
The Chief Executive	Wiltshire County Council
Mrs North	Wood Green Animal Shelters
	Woolmer Cottage Stables
	World Animal Net
	World Soc Protection of Animals
Mr Dragon Nastic	WSPA
Andrew Williams	Zoos Forum Secretariat

Analysis of replies

from the public

ISSUES EXAMINED

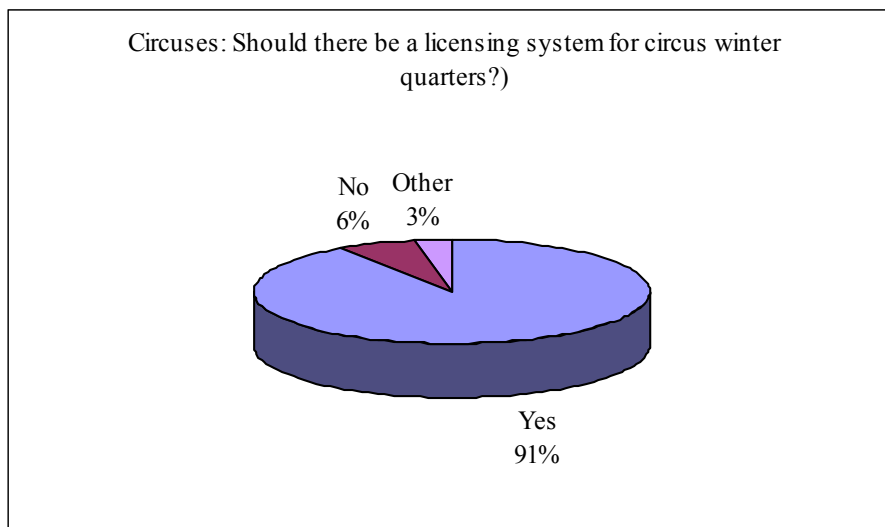
Issues raised	% that commented on a particular issue
Should circus winter quarters be licensed?	1.4
Should animals in circuses be banned?	2.3
Should there be greater regulatory control over public and private pet fairs?	15.0
Should the minimum age at which unaccompanied children can buy pets be raised?	7.3
Should the sale of animals in pet shops be banned?	1.9
Does existing law provide adequate protection for pheasants reared for sport shooting?	1.9
Should there be greater regulatory control over the buying and selling of exotic animals?	15.4
Should the tail docking of dogs be banned?	80.0
Create a new offence of ‘likely to cause unnecessary suffering’?	13.9
Should we increase police powers when investigating an allegation?	13.4
Should the power of arrest in 1911 Act be extended regarding animal fighting?	1.2
Increase sentences?	10.1
Should we increase time allowed for proceedings to be brought before a court?	11.9
Should the Secretary of State be empowered to make Codes of Recommendation?	12.5
Should animal sanctuaries be licensed?	6.2
Should livery yards be licensed?	1.8
Should electronic prods be banned?	1.9
Should it be an offence for breeders to produce an animal that is genetically defective?	4.9
Should the tethering of horses be banned?	0.9

ISSUE – CIRCUSES: SHOULD THERE BE A LICENSING SYSTEM FOR CIRCUS WINTER QUARTERS?

27 of the submissions received commented on whether there should be a licensing system for circus winter quarters.

Figure 1.1 shows the division of opinion on this issue

Of the submissions received 12.5% of those that were for licensing circus winter quarters were standard replies. None of those that were against or gave other comments on the issue were standard letters. (Nick Palmer)



Arguments put forward for licensing circus winter quarters

Quote

“Health checks by an independent vet at least annually (including spot check) should be carried out. These should look at overall health, fitness for required purpose, behaviour assessments. Training methods should also be looked at as well as housing. There should also be a legal requirement for provision of appropriate care at the end of the animals performing life.”

In brief

- Licensing conditions should allow welfare and health standards to be assessed regularly

Arguments put forward against licensing circus winter quarters

Quote

“Present legislation is quite adequate, especially as they are watched in minute detail by all the animal welfare groups.”

In brief

- Current legislation is adequate.
- Standards of care are already monitored by animal welfare groups.

Other comments

- Legislation should cover all performing animals not just those in circuses.

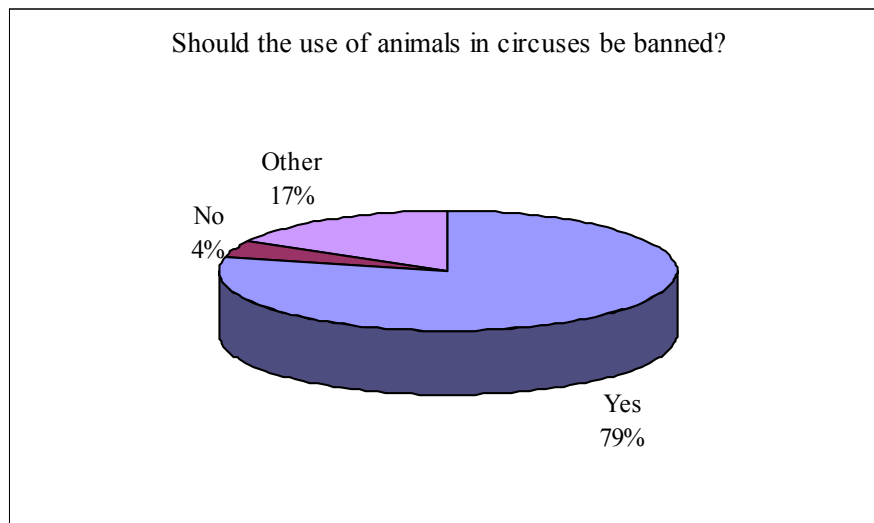
ISSUE – SHOULD THE USE OF ANIMALS IN CIRCUSES BE BANNED?

45 of the individual submissions received commented on whether circuses should be banned.

Figure 1.1 shows the division of opinion on this issue.

Of those submissions received 8.6% of those that were for banning circuses were standard replies. None of the submissions that were against the banning of circuses or gave other comments on the issue were standard replies.

(Nick Palmer)



Arguments put forward for the banning of circuses

Quotes

“I don’t think animals were put on this earth to perform for us.”

“The animals welfare is paramount and the circus environment so alien to their natural habitats that they should be banned on this basis alone.”

“It is not natural for, say a lion to jump through a hoop of fire so we must ask ourselves what has made them do it? Is it the fear of what will happen to them if they don’t?”

In brief

- Animals are kept in unnatural environment.
- Performance is unnatural to the animals.
- Training methods assumed severe to create unnatural behaviours in performance.

**Arguments put forward
against the banning of circuses**

- Legislation should not be created if specific problems have not been identified.

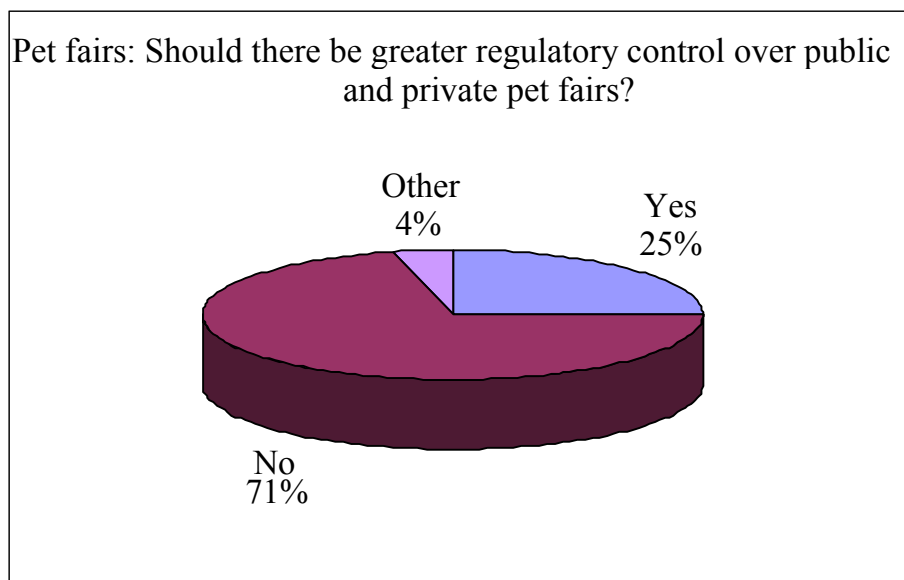
Other comments

- Improve existing legislation to raise welfare standards.

ISSUE – SHOULD THERE BE GREATER REGULATORY CONTROL OVER PUBLIC AND PRIVATE PET FAIRS?

297 of individual submissions received commented on the issue of regulating pet fairs.

Figure 1.1 shows the division of opinion on this issue.



Of the submissions received that did want further regulatory controls over pet fairs 58.8% were in a standard format.

Of the submissions received that did not want further regulatory controls over pet fairs 74.6% were in a standard format.

(PCT) (Aviculture) (Reptiles).

Arguments put forward for greater regulatory control of pet fairs

Quotes

“We believe that current regulatory controls over Pet Fairs is unclear, and it would be beneficial if the welfare of commercially traded pets, sold at such events, comply with the standards outlined by the PCT Pet Care Charter and LGA Guidelines.”

“The legality of pet fairs and sales should be confirmed. They are important for exchange of stock and to maintain healthy bloodlines. They can help to educate and foster good husbandry.”

“There should certainly be licensing controls brought into force to regulate and licence such events, in my own opinion the 1951 Pet Animal Act is now being abused by the animal activists to prevent such events taking place within the UK which is probably an infringement of our human rights.”

“Birds are treated badly, cramped conditions, no food or water, and only ways for some to make money. A definite code of ethics and licensing of events is needed.”

In brief

- Current legislation needs clarification.
- Regulation would ensure minimum welfare standards could be enforced.

Arguments put forward against greater regulatory control of pet fairs

Quotes

“We need outlets for our spare birds this is where shows and auctions come into play, not only to sell our spare stock but to acquire new stock for our own breeding programmes.”

“At the moment there are Sales Days, Auctions and Genuine Bird Shows, where birds are booked to be exhibited individually and then judged. All of these are separate events and cannot be lumped together for legislative purposes.”

“Private access pet fairs should not have any greater regulatory control simply because it would be challenged under the European Human Rights Legislation 1998, UK enactment 2000. This, as you well know, allows for the absolute right to the Freedom of Free Association and Assembly, which would be compromised by any controls on how members of society can meet together. Pet fairs open to the public need legal clarification, but this has only been contentious in the last 2/3 years, due to the animal welfare group's spurious claims on health and supposed welfare issues. The transport and display of the animals is superior to that required by IATA to which the government is supportive and happy with. Animals brought to fairs are there for only a few hours, which in most instances is a far shorter time period than that normally experienced when shipped for and by other means of transport.”

In brief

- Regulation is potentially in contravention of the Human Rights Act.
- Fairs are an important way for breeders to dispose of excess stock, share knowledge and give and receive advice on best practice.
- Standards of welfare are already above government accepted standards.

Rural/Urban Split

The GIS system was used to ascertain whether there was a difference of opinion on the above issue between rural and urban areas. Of the submissions relating to the above issue 54.2% were received either by e-mail or did not give an address and so could not be included in the analysis.

Figure 1.2 is based on 45.8% of the submissions received on this issue of which 40% were for greater regulatory control of pet fairs, 54.1% were against and 5.9% made other comments.

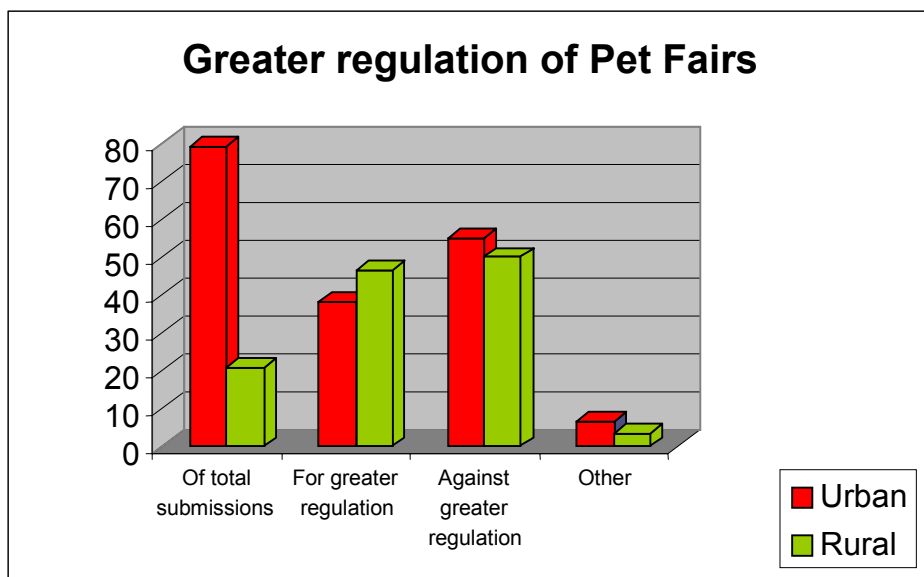


Figure 1.2

The above bar chart shows that of the submissions analysed.
79.3% were from urban areas.
20.7% were from rural areas.

Of those submissions:

38.3% of urban submissions and 46.4% of rural submissions were for greater regulation.

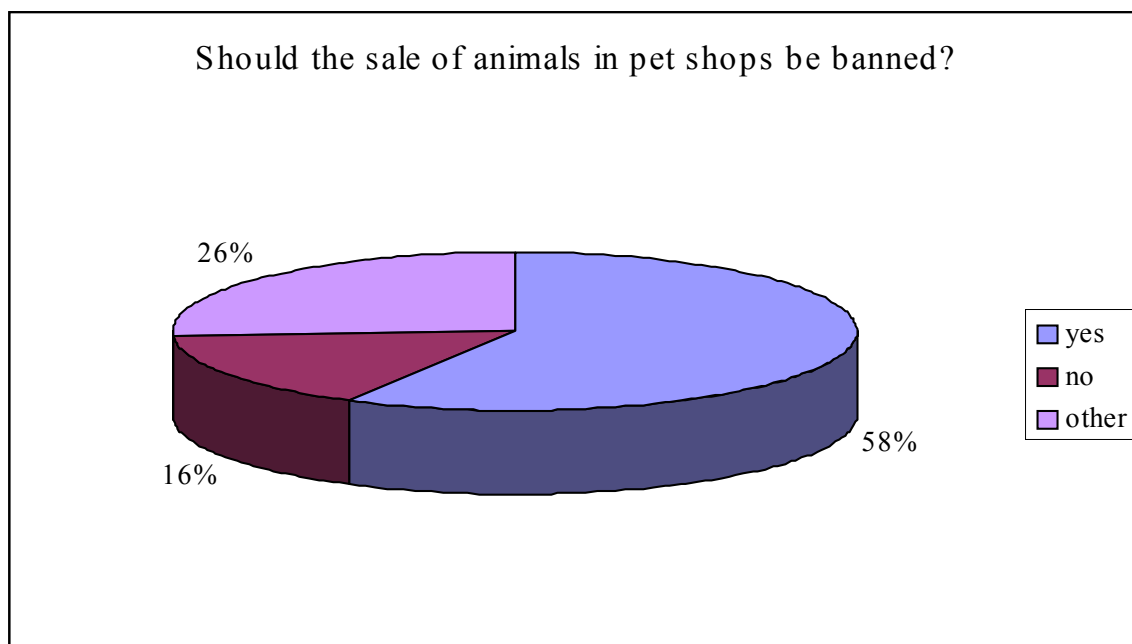
55.2% of urban submissions and 50% of rural submissions were against greater regulation.

6.5% of urban submissions and 3.6% of rural submissions made other comments on the issue.

ISSUE – SHOULD THE MINIMUM AGE AT WHICH CHILDREN CAN BUY PETS BE RAISED?

145 of the individual submissions received commented on whether the minimum age at which children can buy pets should be increased

Figure 1.1 shows the division of opinion on the above issue



Arguments put forward for raising the minimum age

Quote

“Not only should the minimum age at which children can buy pets be raised (e.g. to 16 – the age at which they can take independent responsibility for their own offspring) but also the minimum age for a member of the household should be set at no less than eight years old. I have seen the terrible consequences of small children being in contact with defenceless animals – they are not in my experience wilfully cruel, but until this age children just do not seem aware of the need to be gentle and considerate to animals.”

In brief

- The most acceptable age at which unaccompanied children should be allowed to buy a pet was 16.
- It was suggested that children under 16 did not have enough of a sense of responsibility or knowledge resource to care for an animal.

Arguments put forward against raising the minimum age

Quotes

“The PCT Pet Care Charter already forbids members to sell pets directly to any person under the age of 16 years who is unknown to the licensee, unless that person is accompanied by a parent or legal guardian or provides appropriate written consent. Additional clauses cater for other eventualities, which we feel are more than adequate to cover the responsible sale of livestock; raising the age limit therefore, we feel is unnecessary.”

“The majority of 12 year olds are quite capable of looking after their brothers and sisters and more than capable of handling and caring for animals and birds. There is no need to raise the age limit for purchasing. To remove the ownership and permission to have a personal pet could be a diminution of the human rights of young people.”

In brief

- Pet shops already have voluntary code of not selling animals to unaccompanied children under 16.
- Animal care teaches children responsibility, widens knowledge and can build confidence.

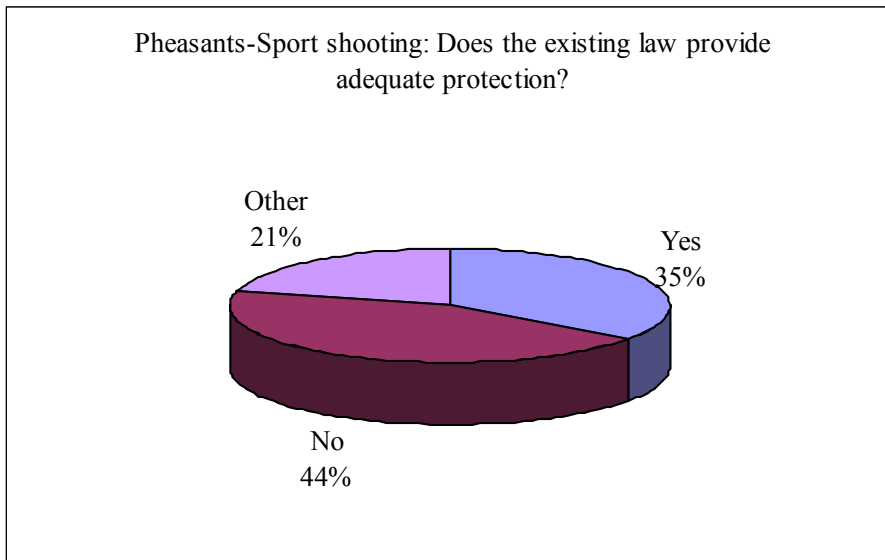
Other comments made

- Have trial period of ownership for children so that pets can be returned if unwanted
- Pet shops need to have experienced staff offering advice on suitability, feeding and housing needs, location of local vets, clubs etc.

ISSUE – PHEASANT SPORT SHOOTING: DOES EXISTING LAW PROVIDE ADEQUATE PROTECTION?

37 of the individual submissions received commented on whether existing legislation provides adequate protection for pheasants produced for sport shooting.

Figure 1.1 shows the division of opinion on the above issue



Arguments put forward that existing legislation is adequate

Quotes

“Surely it is common sense that gamekeepers and game farmers already do everything in their power to rear in the best possible way and adequate conditions to ensure the highest quality of birds they can produce. Their living depends on it. I totally agree that legislation should be brought up to date but not used as an excuse to inflict further damage and restrictions on the law abiding citizens who pursue country sports.”

“Fluctuating weather patterns make this system vulnerable as well as necessitating the use of removable ‘bits’ clipped onto the nostrils and passing between the upper and lower beaks for the prevention of feather pecking. The latter is prevented in turkeys by permanent beak trimming, inappropriate for birds that are going to be released and which need to peck the ground, or by confinement in windowless sheds under conditions of low light intensity, also inappropriate. Bits are normally applied at 3 weeks and removed at release. This is a costly procedure and not undertaken lightly. Not every batch of chicks that is bitted will feather peck but most will. The vice is independent of stocking density. It should be mandatory on welfare grounds to bit prophylactically rather than to wait until damage has been done. It should be emphasised that one is not just concerned about direct cannibalism but about the weather protection provided by good feather quality which is relatively unimportant in table poultry.”

“A record of the number of birds shot is maintained and over this season out of the 500 birds (released) 224 were shot. This percentage of birds shot is about the national average that obviously

shows that over half the pheasants released remain in our countryside. Genuine shooting people respect the countryside and as well as pursuing their sport help to greatly improve game bird population and habitation.”

In brief

- Voluntary code of practice exists issued by the Game Farmers Association.
- Poults are harder to rear and are being reared to be self sufficient in the wild, management system must be effective.
- Removable ‘bits’ are used as an alternative to beak trimming to prevent feather pecking and allow the full beak to be retained so that the bird can survive in the wild.

Arguments put forward **that existing legislation is inadequate**

Quotes

“Captive pheasants are basically tame birds that are driven for shooting. There should at least be a code of management for these birds in both the pens and at the shoot. The ‘picking up’ after shooting is not well-managed and untrained dogs rush around making injured pheasants more terrified and in more pain. Only trained dogs and experienced handlers should pick up and there should be some regulation of this.”

“This is a subject that absolutely appals me. That people breed animals for the purpose of injuring and/or killing them is almost beyond belief. To be quite honest, I was sickened to realise that this practice is legal. Please do all you can to ensure that it is outlawed. Furthermore, I urge you to ban altogether the practice of shooting animals.”

“I do not think that this should be an acceptable practice but if it is these pheasants should be provided with a good quality of life whilst this is possible and have food, water and space available. There should not be any unnecessary suffering if they are shot they should not be left in agony to die but put out of their misery.”

In brief

- Morally unacceptable to rear an animal to be shot for pleasure.
- Create code for welfare at the shoot as well as in captivity.

Other comments made

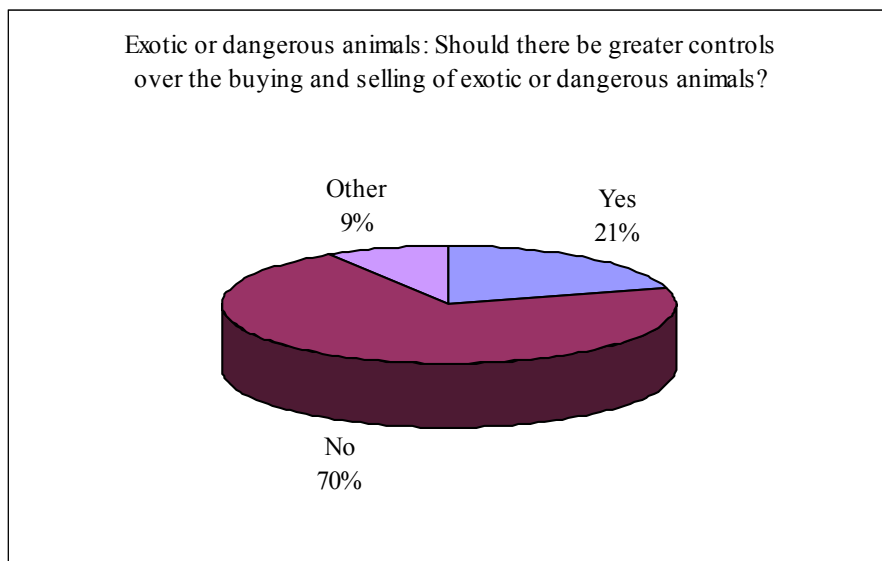
- Need clearer definition of determining the welfare of pheasants.
- Standards should be comparable with farmed livestock.

ISSUE – SHOULD THERE BE GREATER REGULATORY CONTROL OVER THE BUYING AND SELLING OF EXOTIC OR DANGEROUS ANIMALS?

306 of the individual submissions received commented on whether there should be greater regulatory control over the buying and selling of exotic or dangerous animals.

34% of the submissions that were for greater regulatory control, 69% of the submissions that were against greater regulatory controls and 55% of those that made other comments were standard letters (Reptiles) (Nick Palmer) (PCT).

Figure 1.1 shows the division of opinion on this issue.



Arguments put forward for greater regulatory control

Quotes

“There should be greater regulations related to the obtaining and rearing of exotic pets who are often neglected. Often their owners are not at fault, as such, but are unaware of the needs of these animals and should prove first that they have sufficient knowledge of what the care of these animals involves.”

“Those wishing to purchase and keep exotic pets such as snakes, lizards and spiders etc should be expected to complete a course in animal husbandry and have a certificate of competence which should be produced on demand.”

“Fish – many tropical and marine fish are bought as pets that are most unsuitable to keep in aquariums – I feel there should be a limit - the sale of those over a certain size as adults should not be permitted. Tropical fish such as Oscars are one and outside fish such as Sturgeon are another example – the numbers being sold, if they survive are soon going to outgrow their owners pond and probably be dumped in rivers and lakes – to the detriment of existing stock!”

In brief

- Regulations to require owners of exotic animals to prove they are competent to provide specialist care and facilities
- Purchasers need to be fully aware of the adult size and needs of an animal and have provision to care for the animal throughout its life.

Arguments put forward against further regulatory control

Quotes

“Exotic animals refers not only to reptiles and amphibians but to tropical and cold water fish and the buying, selling and possession of these so called exotics relates to millions of householders (voters). There has been a review – paid for by taxpayers’ money – into the Dangerous Wild Animals Act. Animals under the DWA Act should be considered under that Act and remain a separate remit.”

“The thing that annoys me the most is that people who keep reptiles are often portrayed as irresponsible, their animals are dangerous and the source of disease. Ask any doctor how many cases of animal related injuries and infections are the result of reptiles, compared to that of cats and dogs. Granted there are far more cats and dogs kept as pets and that they are often let free by their irresponsible owners, to defecate in other peoples gardens and in our streets and parks, therefore making it easier to spread their infections, but does this not mean that you should be looking harder at cat and dog owners rather than reptile owners.”

“In reality some reptiles are easier to care for than a cat or dog and much less time consuming once the basic principles of care are met. Banning such animals will move what is already a low-key hobby, due to recent animal action groups, totally underground. This will encourage the “dumping” of banned animals causing more suffering”

In brief

- Majority of owners already have good knowledge of their animals’ needs.
- Injury and disease threat from these animals has been exaggerated.
- Restricting the keeping of these animals could lead to many being abandoned.

Other comments

"Exotic needs to be carefully defined within any legislation. Does this mean 'not native to the UK?' in which case common pets such as small rodents (hamsters and gerbils etc), birds (parakeets, parrots) and even goldfish would be covered by the legislation."

"Does this mean 'not native to the UK and wild caught' in which case many reptiles (including some covered by the Dangerous Wild Animals Act) would be excluded from the legislation due to the numbers of these which are successfully bred in captivity in the UK?"

"Does this mean 'not native to the UK whether captive bred in the UK or caught wild abroad?' If so, again, small mammals, birds and fish would be covered."

"Does this mean 'not native to the UK and intended as pets?' If so, again, small mammals, birds and fish would be covered."

In brief

- Need to clearly define "exotic".
- Keep Dangerous Wild Animals Act separate from Animal Welfare Bill.

Rural/Urban split

The GIS system was used to ascertain whether there was a difference of opinion on the above issue between rural and urban areas. Of the submissions relating to this issue 51.3% were received either by e-mail or did not give an address and so could not be included in the analysis.

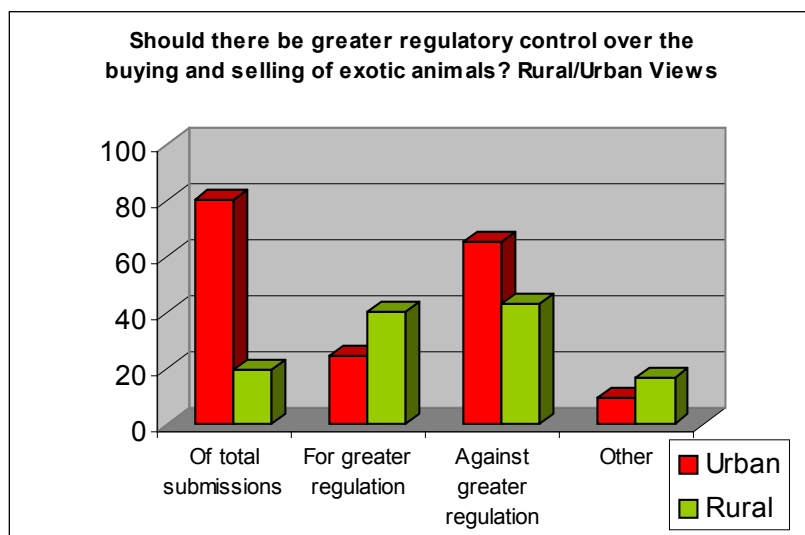


Figure 1.2 is based on 49.7% of the submissions received on this issue of which 27.6% were for greater regulatory control of the buying and selling of exotic animals and 61.2% were against. 11.2% made other comments.

Figure 1.2

The above bar chart shows that of the submissions analysed:
80.3% were from urban areas
19.7% were from rural areas.

Of those submissions:

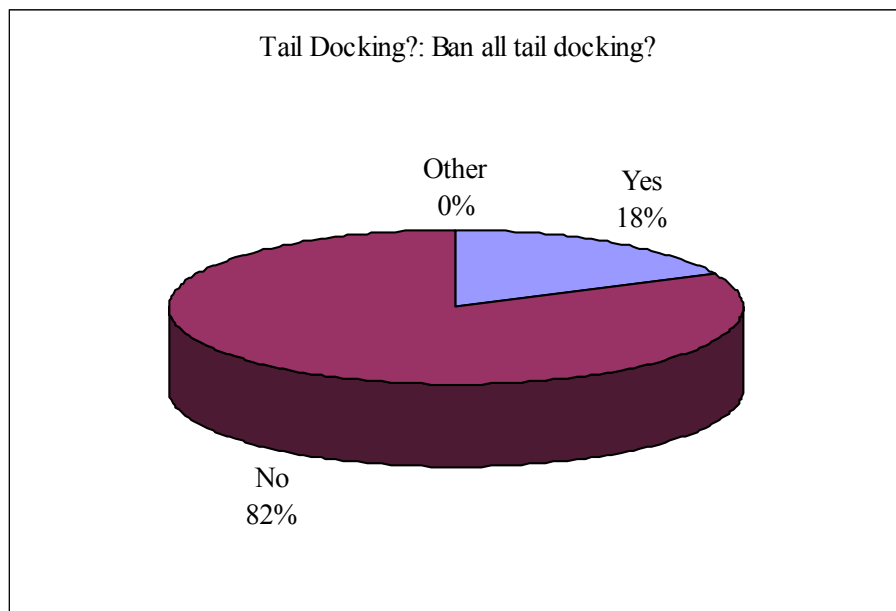
24.6% of urban submissions and 40% of rural submissions were for greater regulatory control of the buying and selling of exotic animals.

65.6% of urban submissions and 43.3% of rural submissions were against greater regulatory control of the buying and selling of exotic animals.

ISSUE – SHOULD TAIL DOCKING OF DOGS BE BANNED?

1590 of the individual submissions received commented on the above issue.

Figure 1.1 shows division of opinion on the above issue.



Arguments put forward for the banning of tail docking

Quotes

“The tail is simply an essential means of communication and balance for all dog breeds. Its removal for cosmetic reasons is unjustified, cruel and an abhorrent mutilation. Every argument in its favour can be readily countered, for example, the fact that some breeds used for particular purposes are docked whereas others used for exactly the same purpose are not. It is rare in the extreme for tails to be damaged even among working breeds and, even when they are, for docking to be necessary to cure any injury.”

In brief:

- Tail is an essential means of communication and balance.
- Possibility of chronic appendage pain.
- No evidence to prove that puppies feel less pain than adult dogs.
- Inconsistency in docking some breeds and not others that potentially do same work.
- Lack of evidence to substantiate claims of injury caused if not docked.

Arguments put forward against the banning of tail docking

“ The Swedish Kennel Club have done an audit on tail trauma in just one gundog breed, the damage was 27% and increased to 35%, it is not just the trauma to the dog but the underlying risk of infection. Also there is great risk of recurrent trauma. As a breeder (of Sealyham terriers) I am greatly concerned that if this proposed ban became law then this breed will die out. Already since the revised 1993 Act the registration for the breed has diminished by more than 50%. We have a small gene pool and undocked dogs do not fit the breed standard.”

“ I strongly believe that if the docking of tails is carried out by a vet, humanely and in professional circumstances then this will deter people from carrying out the docking process by themselves thus causing injury, mutilation and stress to the puppy concerned.”

“ If docking were banned, large dogs of the normally docked breeds, which make popular family pets today, would find its popularity plummeting as a long heavy tail can, of itself, cause damage – particularly where small children are concerned.”

In brief

- Working gundogs are especially at risk from tail injury when working in thick cover.
- Large dogs can damage tails on furniture.
- Amputation of tail in adult dogs more traumatic and healing is difficult.
- Will encourage breeders to produce natural bobtails at the risk of concentrating congenital defects.
- Current breed standards will be lost.
- Long haired breeds such as the Old English Sheepdog and the Yorkshire Terrier are docked for hygiene reason. Fouling problems can lead to flystrike in extreme cases.
- It was suggested that the mutilation of dogs should not be considered any differently from that of farm animals where tail docking, teeth clipping and beak trimming are carried out routinely by lay people.
- Other mutilations carried out on domestic animals include castration, spaying and the removal of dew claws.

Rural/Urban split

The GIS system was used to ascertain whether there was a difference of opinion on the above issue between rural and urban areas. Of the submissions relating to this issue 12.6% were received either by e-mail or did not give an address and so could not be included in this analysis.

Figure 1.2 is based on 87.4% of the submissions received on this issue of which 15% were for a ban on tail docking and 85% were against.

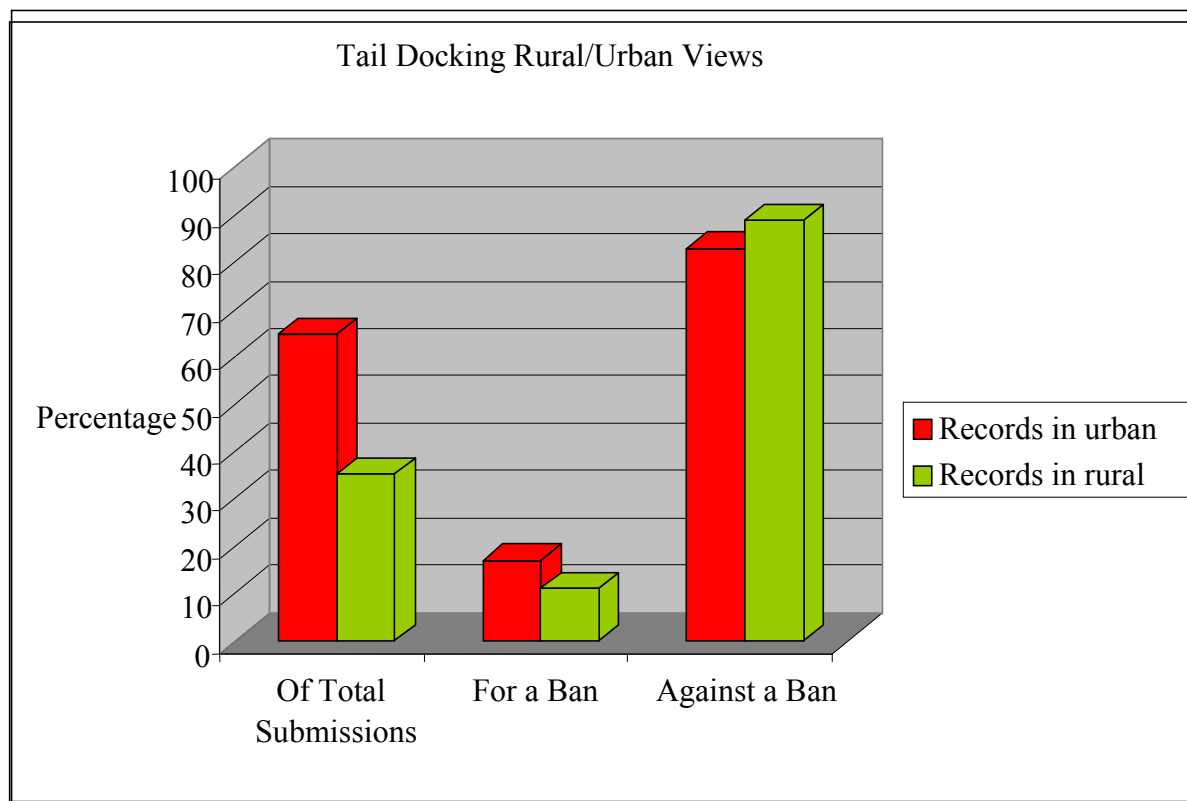


Figure 1.2

The above bar chart shows that of the submissions analysed:
64.7% were from urban areas
35.3% were from rural areas

Of those submissions

17.1% of the urban submissions and 11.2% of the rural submissions were for a ban on tail docking.

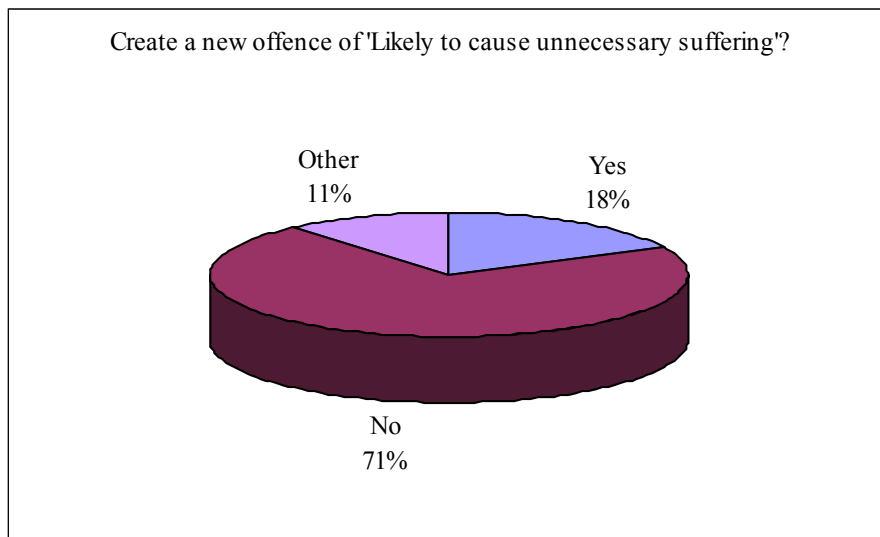
Whilst 82.9% of the urban submissions and 88.8% of the rural submissions were against a ban on tail docking.

ISSUE – SHOULD A NEW OFFENCE OF “LIKELY TO CAUSE UNNECESSARY SUFFERING” BE CREATED?

276 of the individual submissions received commented on whether a new offence of ‘likely to cause unnecessary suffering’ should be created.

78% of the submissions received that were against creating a new offence were standard letters.
(PCT) (Reptiles) (Aviculture)

Figure 1.1 shows the division of opinion on the above issue.



Arguments put forward for creating a new offence

Quotes

“I am encouraged to learn that consideration is being given (and has been for some time) to permit prosecution for cruelty that is likely to occur and not have to wait until the cruelty is proved and the animal is beyond hope or dead.”

“If suffering is likely to be caused to animals by someone, or by procedures within industry surely it should be banned. Where does this leave factory farming, intentional cruelty through hunting and the terrible conditions in abattoirs.”

“Any new definition should be clear, concise, easily understood and unambiguous. If this is not the case there will be wide and varying interpretation by over zealous people who actually know nothing of animal behaviour or needs.”

In brief

- Current legislation is reactive rather than proactive.

Arguments put forward against creating a new offence

Quotes

“In my opinion the creation of an offence of ‘likely to cause unnecessary suffering’. How can someone be charged for what they might do? This would give extremist animal rights campaigners all the ammunition they could wish for.”

“This ‘likely to cause unnecessary suffering’ is badly worded and subject to loophole interpretations. Either be specific or forget it.”

“A new offence of ‘likely to cause unnecessary suffering’ is not possible to police and is Hitlerian.”

In brief

- Wording is ambiguous and impossible to enforce.
- Current legislation is adequate.

Rural/Urban split

The GIS system was used to ascertain whether there was a difference of opinion on the above issue between rural and urban areas. Of the submissions relating to the above issue 51.6% were received either by e-mail or did not give an address and so could not be included in the analysis.

Figure 1.2 is based on 48.4% of the submissions received on this issue of which 30.1% were for the creation of a new offence of “likely to cause unnecessary suffering” 54.1% were against and 15.8% made other comments.

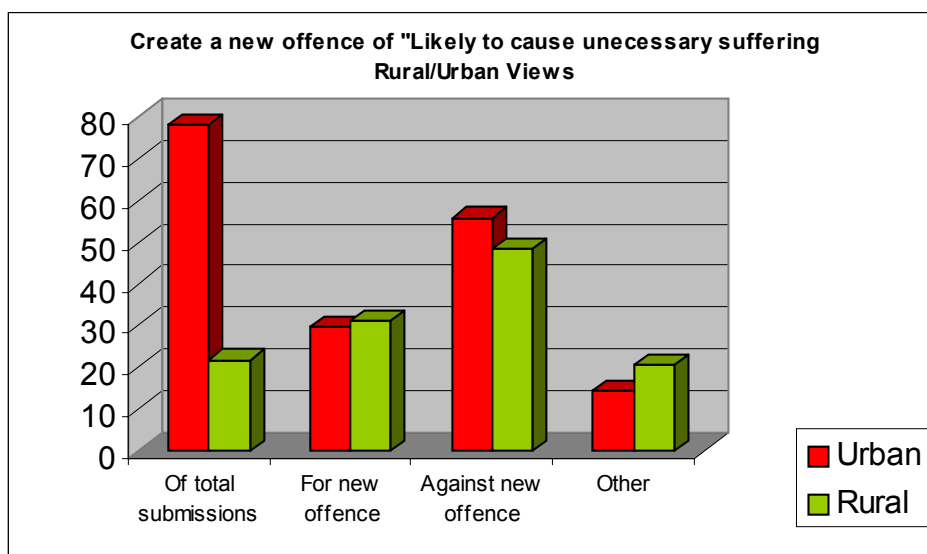


Figure 1.2

The above bar chart and histogram show that of the submissions analysed. 78.2% were from urban areas. 21.8% were from rural areas.

Of those submissions:

28.8% of urban submissions and 31% of rural submissions were for creating a new offence.

57.8% of urban submissions and 48.3% of rural submissions were against creating a new offence.

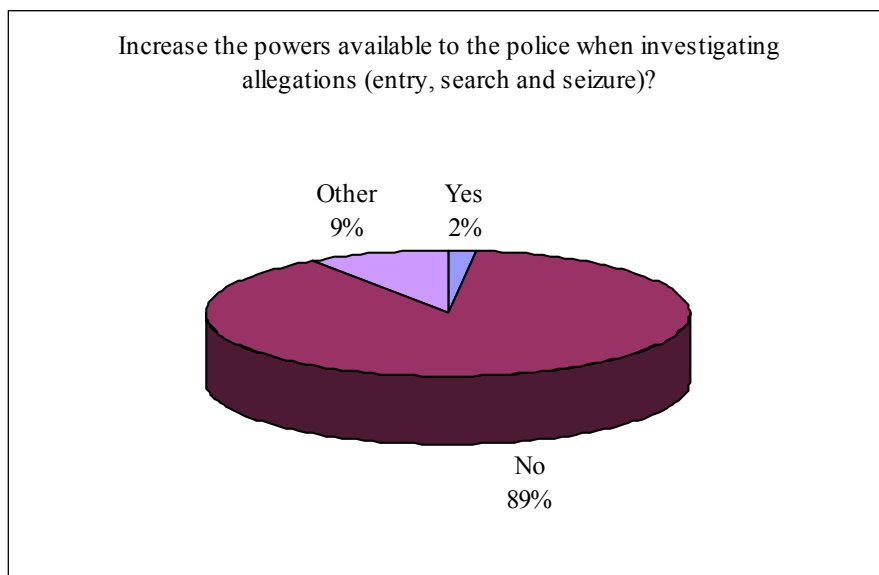
13.4% of urban submissions and 20.7% of rural submissions made other comments on the issue.

ISSUE – INCREASE POWERS AVAILABLE TO POLICE WHEN INVESTIGATING ALLEGATIONS?

267 of the individual submissions received commented on whether police powers should be increased when investigating allegations.

Of the submissions received that were for increasing police powers 9.2% were standard letters whilst of those that against increasing police powers 80.9% were standard letters.
(PCT) (Reptiles) (Aviculture) (Nick Palmer)

Figure 1.1 shows the division of opinion on the above issue



Arguments put forward for increasing police powers

Quotes

“Increase powers will be necessary to ensure convictions. All too often people are able to hide their crimes.”

“All existing sentences, penalties and enforcement procedures are grossly inadequate and should be substantially increased –police powers of entry, search and seizure and arrest should be extended.”

“It is often quite discouraging to see how easy it is for unsuitable people to block access or seizure by the authorities.”

In brief

- Increased powers would ensure that adequate evidence is obtained to ensure conviction and allow police access to animals at risk.

Arguments put forward against increasing police powers

Quotes

“The level of such problems is greatly exaggerated by the ‘anti’ lobby and we need to ensure that legislation and enforcement powers are proportionate to the problem with other criminal activities. There are plenty of examples of more serious criminal activities that do not have more powers of seizure, search and entry than the current Protection of Animals Act 1911 – why should this receive special and disproportionate attention?”

“There are more serious criminal activities that are not subject to similarly increased powers so I do not see that they are necessary here. One might see that this is again a mechanism which, would assist the animal extremist groups to follow their political agenda. It must be said that the problems which they claim to encounter in their activities are, in general, exaggerated innocence.”

In brief

- Current powers are adequate and any increase would be disproportionate with other more serious crimes.

Rural/Urban split

The GIS system was used to ascertain whether there was a difference of opinion on the above issue between rural and urban areas. Of the submissions relating to the above issue 55.6% were received either by e-mail or did not give an address and so could not be included in the analysis.

Figure 1.2 is based on 44.4% of the submissions received on this issue of which 13.6% were for increased powers of investigation, 83.1% were against and 3.3% made other comments.

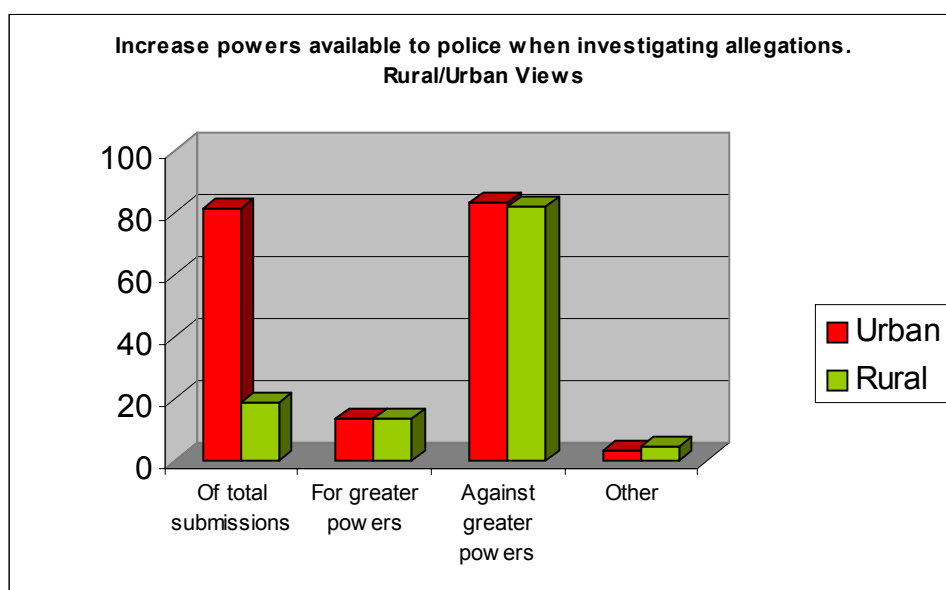


Figure 1.2

The above bar chart shows that of the submissions analysed. 81.4% were from urban areas. 18.6% were from rural areas.

Of those submissions:

13.5% of urban submissions and 13.6% of rural submissions were for greater powers.

83.3% of urban submissions and 81.8% of rural submissions were against greater powers.

3.2% of urban submissions and 4.6% of rural submissions made other comments on the issue.

ISSUE – ANIMAL FIGHTING: SHOULD THE POWER OF ARREST IN THE 1911 ACT BE EXTENDED?

1.2% of the individual submissions received commented on the issue of whether the power of arrest in the 1911 Act should be extended in relation to animal fighting.

100% of the respondents were for extending the powers of arrest under 1911 Act in relation to animal fighting.

Arguments put forward **for extending the powers of arrest in relation to animal fighting**

“Illegal dog fights are cruel and vicious and the police should definitely have the power to arrest anyone who is present whether they own any of the dogs or not.”

“All who attend dog fighting, owners, spectators etc should be arrested and all dogs put to sleep, without question.”

“The very fact that a person is present at an abuse should NOT mitigate his guilt.”

In brief

- In general it was felt that those present, without reasonable excuse, at an animal fight were condoning the abuse and were therefore guilty of an offence.

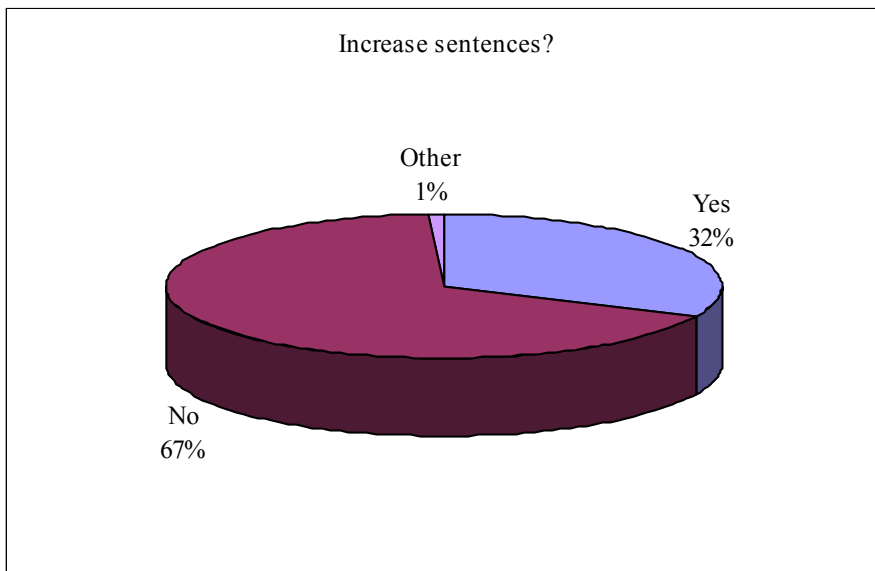
ISSUE – INCREASE SENTENCES

201 of the individual submissions received commented on whether sentences should be increased.

56% of the submissions received that were for increasing sentences and 84% of the submissions received that were against increasing sentences were standard letters.

(Nick Palmer) (Aviculture) (Reptiles)

Figure 1.1 shows the division of opinion on the above issue



Arguments put forward for increasing sentences

Quotes

“Sentences for infringement of animal welfare legislation, particularly involving suffering of animals, should be much more severe than at present, and should include imprisonment more often. Lifetime bans on animal ownership should be imposed more freely, and enforced.”

“For far too long animal abuse has continued because the law to protect them is weak, can be ‘got around’ has loop holes and there is no proper deterrent and no punishment.”

“The current sentences for cruelty are pathetically outdated. I have seen terrible acts of cruelty and the owners have got away with a small fine and perhaps a ban of 2-5 years. Extreme cruelty should mean a large fine or even a ban for life, not just a few years on keeping any animal. And to get round the fact that the offenders spouse could keep a pet, it should be a ban on the household of the offender, so that no animal can be kept in the house.”

In brief

- Sentences not enough of a deterrent.
- Ownership bans can currently be evaded by transferring ownership to another member of the household.

Arguments put forward against increasing sentences

Quotes

“I understand that the existing sentences under the Act appear to be in line with those applicable to similar types of offence and so would not appear to require revision.”

“These would seem more than adequate. It’s a pity that crimes against animal keepers is not given the same consideration.”

In brief

- Current sentences are adequate and in proportion to those for similar crimes.

Rural/Urban split

The GIS system was used to ascertain whether there was a difference of opinion on the above issue between rural and urban areas. Of the submissions relating to the above issue 66.7% were received either by e-mail or did not give an address and so could not be included in the analysis.

Figure 1.2 is based on 33.3% of the submissions received on this issue of which 34.3 % were for increasing sentences, 65.7% were against.

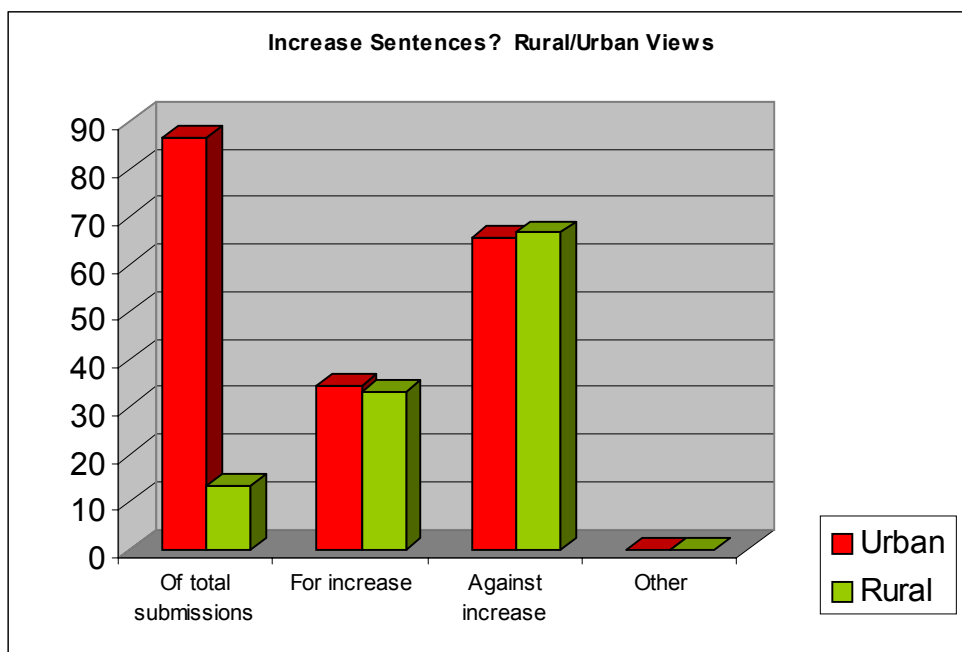


Figure 1.2

The above bar chart and histogram show that of the submissions analysed. 86.6% were from urban areas. 13.4% were from rural areas.

Of those submissions:

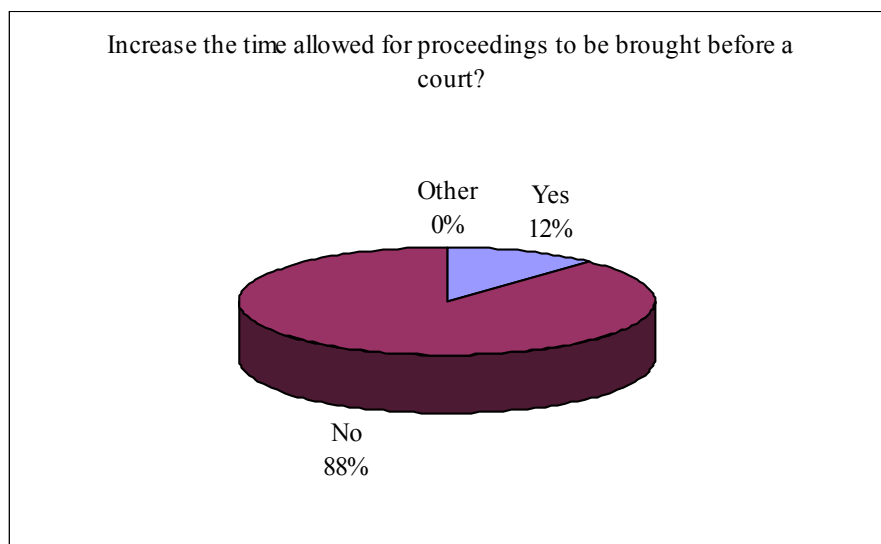
34.5% of urban submissions and 33.3% of rural submissions were for increasing sentences.

65.5% of urban submissions and 66.7% of rural submissions were against increasing sentences.

ISSUE – INCREASE TIME ALLOWED FOR PROCEEDINGS TO BE BROUGHT TO COURT

237 of the individual submissions received commented on whether the time allowed for proceedings to be brought to court should be increased.

Figure 1.1 shows the division of opinion on the above issue.



91.2% of the submissions received that were against increasing the time allowed for proceedings to be brought before a court were standard letters. None of those that were for increasing the time allowed were standard letters (PCT) (Aviculture) (Reptiles).

Arguments put forward for increasing time allowed

Quote

“As the gathering of evidence can take some time in certain circumstances an increase in time would certainly help and should be introduced.”

In brief

- Allow more time for evidence to be gathered

Arguments put forward against increasing time allowed

Quotes

“We feel that any proceedings brought under the 1911 Act should be effected as quickly as possible and certainly within the current six month limit.”

“This should be an absolute and categorical NO. There is already evidence of misuse of the six months. Huge anxiety is often caused amongst those charged even under the current situation and this frequently goes on for 1-2 years before a court ruling is decided. Even if a case does not have

to be brought until two years after the ‘event’ it would be a nightmare and seriously harm people's right to live without charges hanging over them.”

In brief

- Excessive stress for those being charged.

Rural/Urban split

The GIS system was used to ascertain whether there was a difference of opinion on the above issue between rural and urban areas. Of the submissions relating to the above issue 58.2% were received either by e-mail or did not give an address and so could not be included in the analysis.

Figure 1.2 is based on 41.8% of the submissions received on this issue of which 18.2% were for increasing time allowed, 81.8% were against.

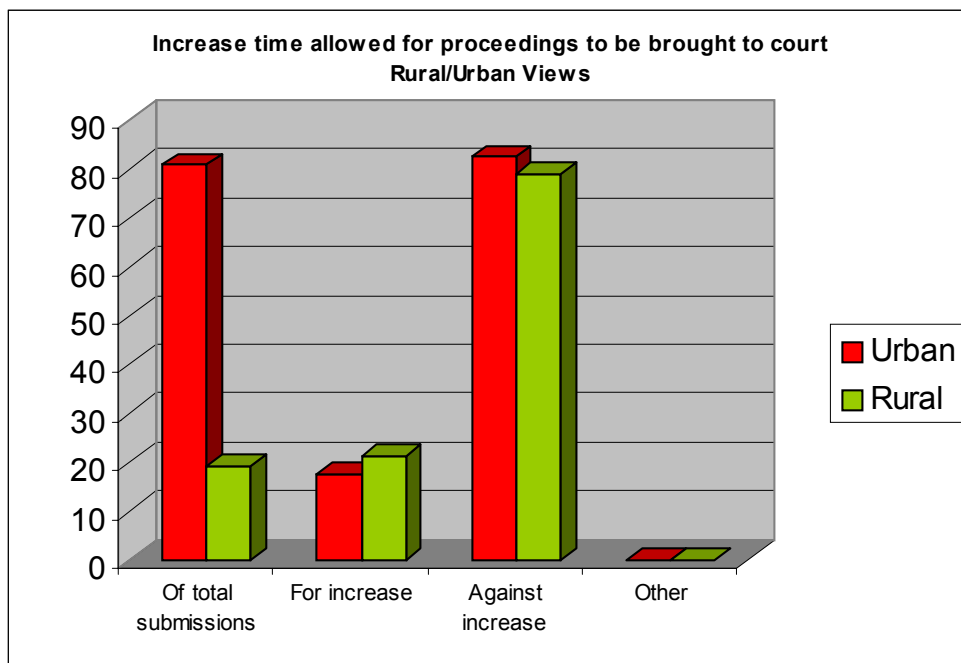


Figure 1.2

The above bar chart and histogram show that of the submissions analysed. 80.8% were from urban areas. 19.2% were from rural areas.

Of those submissions:

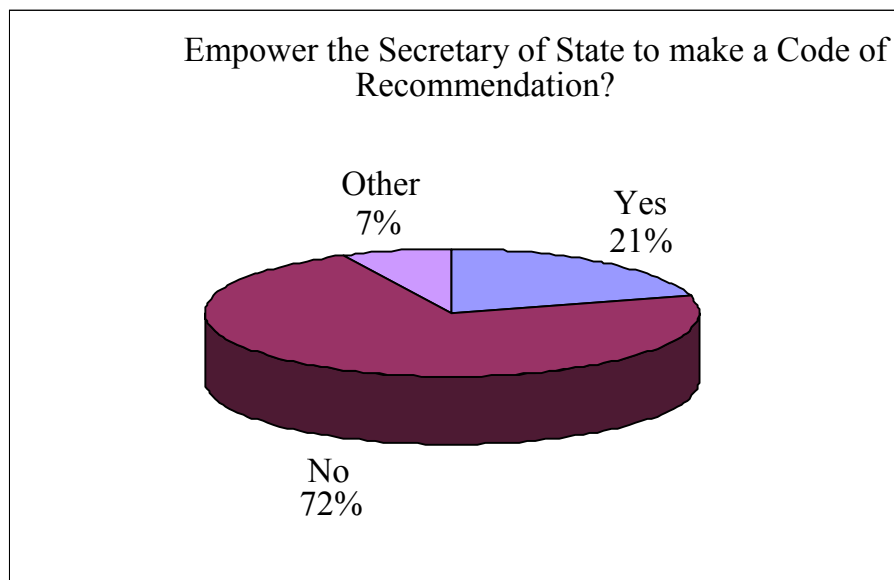
17.5% of urban submissions and 21.1% of rural submissions were for increasing time allowed for proceedings to be brought to court.

82.5% of urban submissions and 78.9% of rural submissions were against increasing the amount of time allowed for proceedings to be brought to court.

ISSUE – SHOULD THE SECRETARY OF STATE BE EMPOWERED TO MAKE CODES OF RECOMMENDATION?

248 of the individual submissions received commented on the issue of whether the Secretary of State should be empowered to make codes of recommendation.

Figure 1.1 shows the division of opinion on the above issue



Of the submissions received that agreed that the Secretary of State should be empowered to make Codes of Recommendation 20% were in a standard format.

Of the submissions received that did not agree or disagree that the Secretary of State should be empowered to make Codes of Recommendation 82.4% were in a standard format.

Of the submissions received that did not agree that the Secretary of State should be empowered to make Codes of Recommendation 81.3% were in a standard format.
(PCT) (Aviculture) (Reptiles)

Arguments put forward for the Secretary of State producing Codes of Recommendation

Quotes

“The process of changing laws and regulations and laws at present is far too cumbersome and cannot match changes in standards required in response to changing circumstances.”

“Ideally this could be extended to codes of practice and stronger measures even that would bring firmer guidance and requirements. Certainly one would wish to be sure that failure to meet the codes is evidence that animal health and welfare issues have been contravened.”

In brief

- Create a speedier route than amending legislation
- Contravention of codes can be used as evidence in court

**Arguments put forward
against the Secretary of State producing Codes of Recommendation**

Quotes

“Why should a political appointee have powers over which he or she may have no knowledge. If the legislation is correctly written and enforced this would negate this necessity.”

“We consider that the Pet Care Charter and LGA Guidelines adequately provide for the high standards of welfare necessary for pets.”

In brief

- Current industry guidelines are adequate.
- Many misunderstood who would be drafting codes.

Those who did not agree or disagree that the Secretary of State should produce Codes of Recommendation

Quotes

“This very much depends what they have in mind and what balance there is at arriving at such Codes of Recommendation. If the Codes of Recommendations are strictly focussed on PROVEN problem areas and not generalised, they may be acceptable. However, they would only be acceptable if the input to such Codes of Recommendations were almost exclusively limited to stakeholders (e.g. animal keepers, traders and their respective organisations).”

In brief

- Required further clarification.

Rural/Urban split

The GIS system was used to ascertain whether there was a difference of opinion on the above issue between rural and urban areas. Of the submissions relating to this issue 55.2% were received either by e-mail or did not give an address and have not been included in this analysis.

Figure 1.2 is based on 44.8% of the submissions received on this issue of which 6.3% were for the Secretary of State introducing Codes of Recommendation and 76.6% were against. 17.1% of the submissions had other comments.

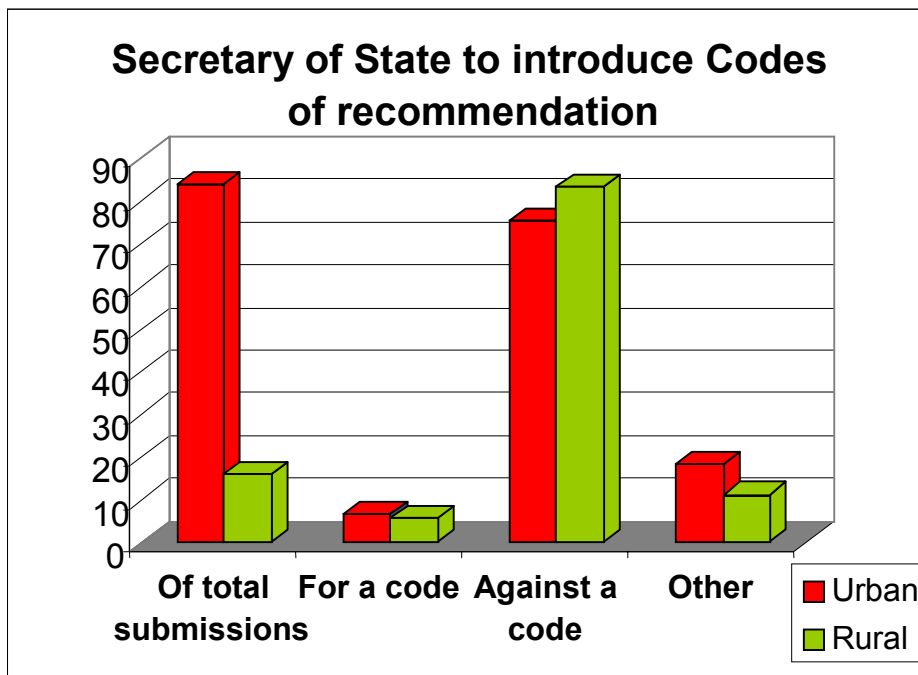


Figure 1.2

The above bar chart shows that of the submissions analysed.
83.8% were from urban areas.
16.2% were from rural areas.

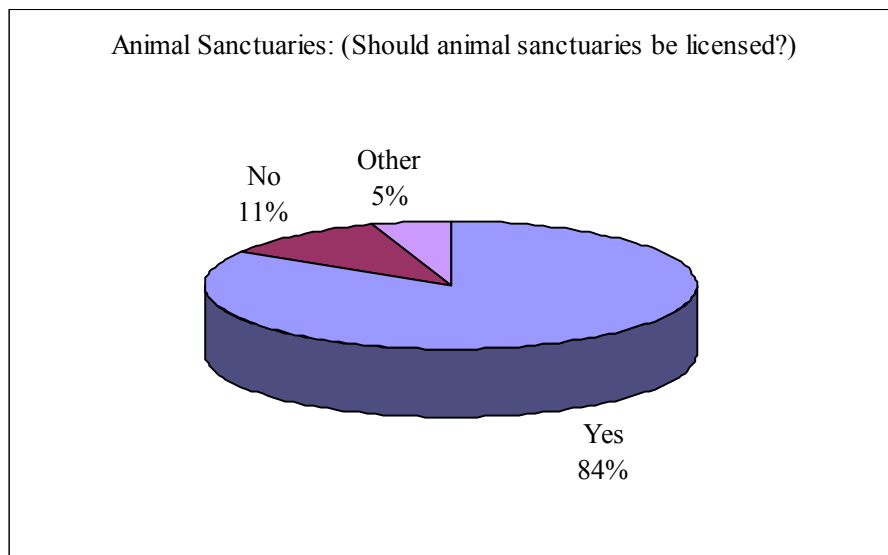
Of those submissions:
6.5% of the urban submissions and 5.6% of the rural submissions were for the Secretary of State introducing Codes of Recommendation.

Whilst 75.3% of urban submissions and 83.3% of rural submissions were against the Secretary of State introducing Codes of Recommendation.

ISSUE – SHOULD ANIMAL SANCTUARIES BE LICENSED

124 of the individual comments received commented on whether animal sanctuaries should be licensed.

Figure 1.1 shows division of opinion over the above issue.



Arguments put forward for the licensing of animal sanctuaries

Quotes

“All animal sanctuaries that collect money from the public should be licensed and the police/RSPCA should have automatic right of access. The status “animal sanctuary” is very easily open to abuse by unscrupulous people where financial gain is the only motivation and unregulated unsupervised animal neglect may be difficult to prove. There are bogus sanctuaries.”

“Animal sanctuaries should be licensed, but sympathetic conditions must apply to prevent unnecessary bureaucracy and expense to operators, otherwise overall effect could be detrimental to the cause.”

In brief

- Sanctuaries would be known and monitored for standards of welfare.
- Licensing should be centrally funded to avoid the closure of smaller sanctuaries.
- Need to determine how far reaching effects will be and set clear guidelines as to who will need to be licensed e.g. foster carers who take animals into their homes, dog breeders who offer to take back animals they have bred if they are no longer wanted and welfare networks that organise re-homing of animals.

Arguments put forward against the licensing of animal sanctuaries

Quotes

“Licensing centres around conditions. Model licensing conditions look great on paper, but, unless money is no object, resultant conditions may be far from suitable for rehabilitating animals. With the exception of the RSPCA, animal rescuers are generally skint.”

“In animal welfare terms, there can be no doubt that wild animals in wildlife hospitals and after release suffer to a far greater extent both in intensity and duration than does any hunted wild animal. It follows that it is somewhat illogical to consider the regulation of the former activity while banning the latter.”

“I fear it will be yet more red tape with another layer of local government bureaucracy to go with it.”

In brief

- Financial impact of obtaining a licence or ensuring that licence conditions are complied with could cause sanctuaries to close down.
- Need to assess whether there is a need for regulation due to specific problems having been identified.
- Could result in animals being abandoned by sanctuaries unable to cope financially.

Rural/Urban split

The GIS system was used to ascertain whether there was a difference of opinion on the above issue between rural and urban areas. Of the submissions relating to the above issue 28.7% were received either by e-mail or did not give an address and so could not be included in the analysis.

Figure 1.2 is based on 71.3% of the submissions received on this issue of which 85.1% were for licensing animal sanctuaries, 10.3% were against and 4.6% made other comments.

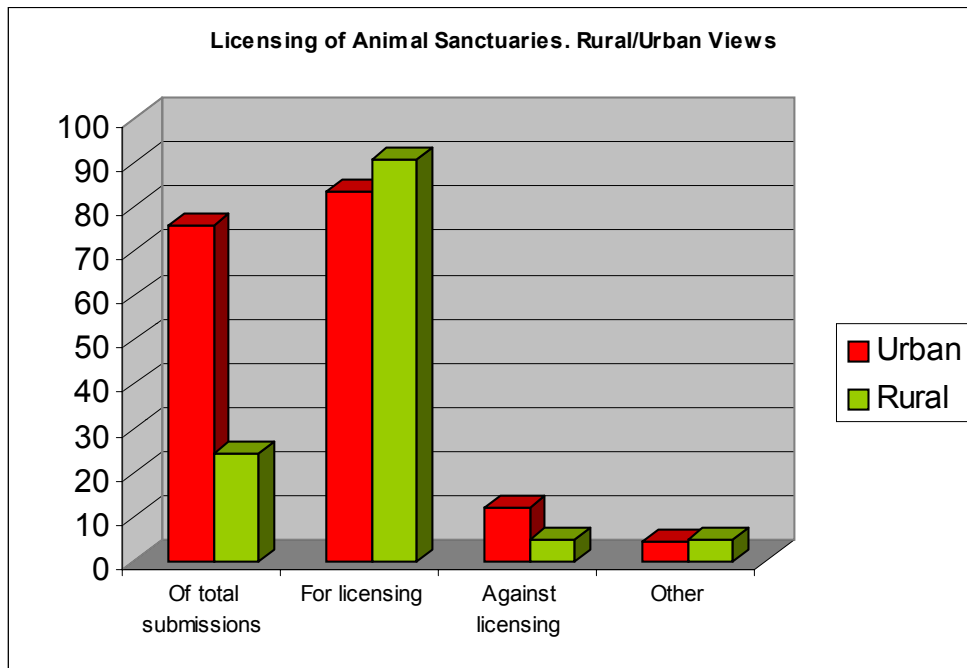


Figure 1.2

The above bar chart shows that of the submissions analysed. 75.9% were from urban areas. 24.1% were from rural areas.

Of those submissions:

83.3% of urban submissions and 90.5% of rural submissions were for licensing animal sanctuaries.

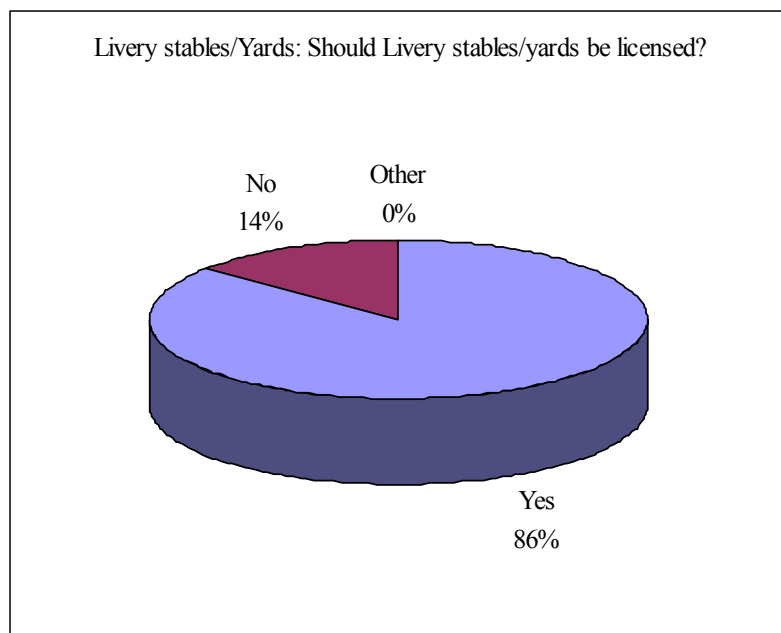
12.2% of urban submissions and 4.8% of rural submissions were against licensing animal sanctuaries.

4.5% of urban submissions and 4.7% of rural submissions made other comments on the issue.

ISSUE: SHOULD LIVERY YARDS/STABLES BE LICENSED?

36 of the individual submissions commented on whether livery yards should be licensed.

Figure 1.1 shows the division of opinion on the above issue.



Arguments put forward for the licensing of livery yards

Quotes

“Regulation of livery yards is essential. Any concerns diversifying farmers may have regarding regulation of livery yards could be more than offset by the huge financial benefits of reclassifying horse enterprises from the entirely inappropriate ‘factory floor’ business rates, to a much more appropriate ‘agricultural’ rate for horse housing, feed and bedding storage areas and riding areas.”

“Premises on which animals are handled for a commercial reason or on behalf of another party should be licensed.”

In brief

- Levels of accommodation and care standardised.
- Welfare of the horses inspected.

Arguments put forward against the licensing of livery yards

Quote

“There is no need to license these any more than farms.”

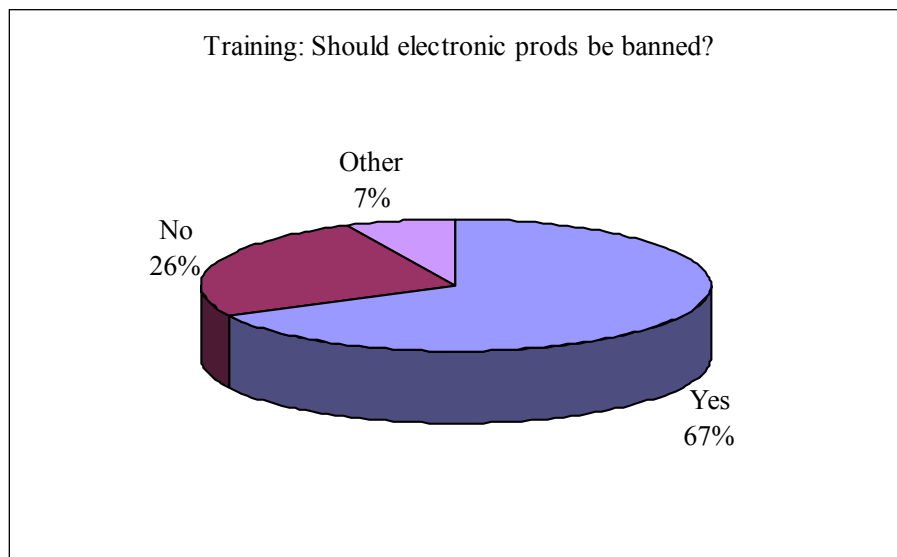
In brief

- Further regulation should only be necessary if problems have been identified to justify cost.

ISSUE – SHOULD ELECTRONIC PRODS BE BANNED?

38 of the individual submissions received commented on whether the use of electronic prods should be banned.

Figure 1.1 shows the division of opinion on this issue



Arguments put forward for the banning of the use of electronic prods

Quotes

“The use of an electronic prod is abusive and causes untold distress to the animal, which is obviously the very idea behind it. There’s no place in society for such cruelty.”

“The animal has no choice but to respond to the command. There are other ways of basic training etc – firmness, with love and respect for the animal.”

“Electronic prods are cruel and certainly create suffering and inflict pain on animals.”

In brief

- Inhumane method of control and training that causes unnecessary suffering.

Arguments put forward against the banning of the use of electronic prods

Quotes

“Electric fencing is in widespread use in zoos, farms etc. Electric prods use the same voltage. Inappropriate use, if causing cruelty, is already covered under existing legislation.”

“I believe your intention is to ask for comments concerning electronic collars for the control and training of dogs and other animals. The use of collars is quick, efficient and humane and I have

never known a dog to be detrimentally affected by one provided they are used carefully and with consideration for the dog and as a last resort after traditional methods have failed.”

“I am quite satisfied that the collar can have beneficial effects in certain situations, particularly when dealing with dogs with established faults which can be difficult to eradicate unless punishment is administered at the moment the fault occurs.”

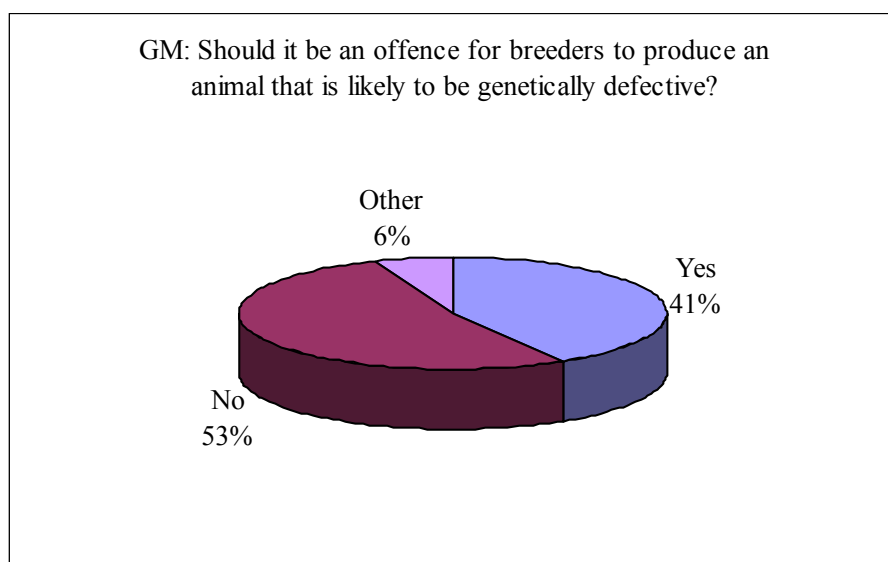
In brief

- Comparison made with widespread use of electric fencing.
- Humane and effective if used correctly and as a last resort.

ISSUE – SHOULD IT BE AN OFFENCE FOR BREEDERS TO PRODUCE AN ANIMAL, WHICH WILL NOT BE USED FOR SCIENTIFIC RESEARCH, OR MEDICAL PURPOSES THAT IS LIKELY TO BE GENETICALLY DEFECTIVE?

108 of the individual submissions received commented on whether it should be an offence for a breeder to produce an animal that is likely to be genetically defective.

Figure 1.1 shows the division of opinion on this issue.



The issue was interpreted in two different ways:

- i) breeding for desirable traits at the cost of passing on congenital defects; and
- ii) developing techniques, through the use of biotechnology for long term animal welfare benefit.

Arguments put forward

that it should not be an offence for breeders to produce a genetically defective animal

Of the submissions received 50% of those that did not agree that it should be an offence for breeders to produce an animal that is likely to be genetically defective were standard letters stating that no constraints should be placed on developing biotechnology.

Quotes

“I do not think legislation is appropriate concerning genetic modification, it is an area so grey at the moment. It could (and almost certainly would) result in making the breeding of cross breeds and mules (in birds) illegal.”

“Some animal rights groups and individuals, notably PETA and its founder, claim that the domestic dog itself is an artificial human construct that should be allowed to disappear. Breeders have for hundreds of thousands of years selected certain lines, or animals with certain characteristics, to produce a desired effect. While I do not support all the work of breeders, notably where selective breeding has produced a creature whose quality of life seems markedly less than the original due to its construction, I think that it would be dangerous to outlaw any or all of the “morphs”, “phases”, etc, that have been encouraged by breeding.”

In brief

- Many breeds will be lost.
- There should be no constraints on any technique that benefits animal welfare.

Arguments put forward

that it should be an offence for a breeder to produce an animal that is likely to be genetically defective.

Quotes

“Dogs and cats can be in constant discomfort because their faces are so squashed their tear ducts overreact, they cannot breathe properly, and pregnant females cannot give birth naturally so always have to have caesareans.”

“It should be an offence for breeders to produce an animal that is likely to be genetically defective in some way for display, aesthetic, agricultural or any other purpose whatsoever.”

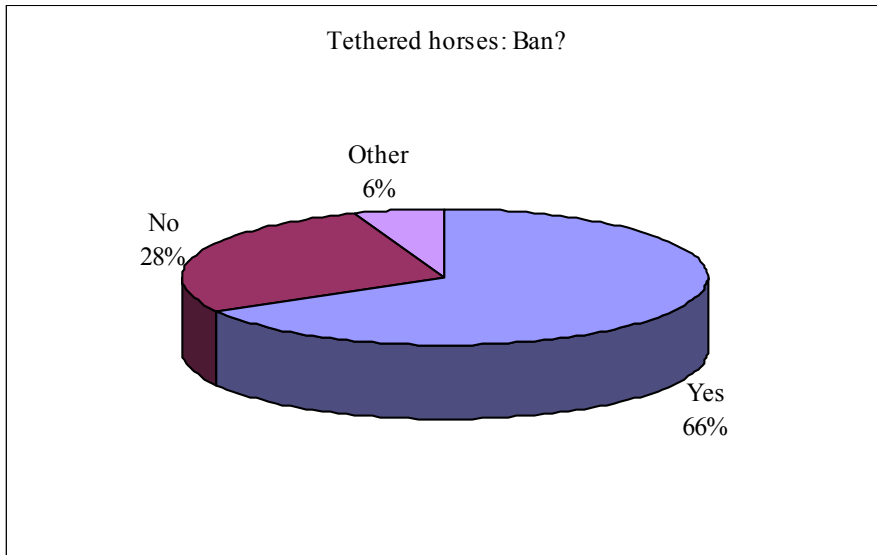
In brief

- Unethical to produce an animal that will suffer due to its physical characteristics or known congenital defects.

ISSUE: SHOULD THE TETHERING OF HORSES BE BANNED?

18 of the individual submissions received commented on whether the practice of tethering horses should be banned.

Figure 1.1 shows the division of opinion on the above issue.



Arguments put forward for the banning of tethering of horses

Quotes

“All tethering is cruel and unnatural to horses. They are herd animals who need to run loose with other horses. I and many others feel that by isolating a horse on a tether is classed as unnecessary suffering.”

“Tethering horses and ponies on waste land is not an answer to long term management. They are at risk both from their health and safety.”

In brief

- Prevents the horse from exhibiting natural herd and roaming behaviour.
- Horse unable to seek its own shelter, fresh grazing and water.
- Risk of strangulation.
- Risk of escaping from tethers onto roads.
- Vulnerable to attack.

Arguments put forward against the banning of tethering

Quotes

“Should tethering be prohibited, this would be hugely discriminatory, especially against gypsy/travellers as they are less likely to be able to utilise fenced fields.”

“My pony benefits from being tethered to stop him from over eating grass which would cause laminitis a painful and often fatal condition.”

“It is not a practice that vets or anyone with working experience of tethering would regard as cruel or detrimental to animal welfare. This is surely borne out by the fact that Britain’s remaining horsed troops - tether their horses when on manoeuvres and there are Queen’s Regulations covering the correct procedures.”

In brief

- Effective management system if carried out properly.
- Ban would be discriminatory.

ANALYSIS OF REPLIES FROM DOG BREED SOCIETIES

List of organisations

Airedale Terrier Club of Scotland
American Cocker Spaniel Club of Great Britain
Australian Terrier Club of Great Britain
Birmingham & District Fox Terrier Club
Bouvier des Flandres Club of Great Britain
Bristol and West Working Gundog Society
British Boxer Club
British Toy Poodle Club
Brittany Club of Great Britain
Canvey Wildfowlers Club
Cardigan Welsh Corgi Association
Carmathenshire Working Gundog Society
Cheshire and North Wales Yorkshire Terrier Society
Cheshire, North Wales & Shropshire Retriever & Spaniel Society
Clumber Spaniel Club
Cocker Spaniel Club
Cotswold Boxer Club
Devon and Cornwall Welsh Corgi Club
Doberman Breed Council
Doberman Club
East Anglian Old English Sheepdog Club
East Midlands Gundog Club
Eastern Counties Poodle Club
Eastern Counties Spaniel Society
Eastern Counties Welsh Corgi Club
English Springer Spaniel Club
English Springer Spaniel Club of Scotland
English Springer Spaniel Club of Wales
Essex and Eastern Counties Boxer Club
Fenland Wildfowlers Association
Freshetini Italian Spinoni
German Longhaired Pointer Club
German Shorthaired Pointer Association
Giant Schnauzer Club
Greater London Old English Sheepdog Club
Griffon Bruxellois Club
Hampshire & Sussex Cocker Spaniel Club
Home Counties American Cocker Club
Inter-Nation Canine Society
International Poodle Club
King Charles Spaniel Club
Lakeland Terrier Club
Lancashire & Cheshire English Springer Spaniel Club
Lancastrian Old English Sheepdog Club
London & Home Counties Boxer Club
London & Home Counties Toy and Poodle Club
Mid Norfolk Gundog Club
Mid Sussex Working Spaniel Club
Midland English Springer Spaniel Society
Midland Lakeland Terrier Club
Midland Old English Sheepdog Club
Midland Rottweiler Club

Midland Sealyham Terrier Club
Miniature Pinscher Club
Miniature Schnauzer Club
National Airedale Terrier Association
National Australian Shepherd Association
National Terrier Club
Norfolk & Suffolk HPR (Hunt Point & Retrieve Breeds) Field Trial Club
North Eastern Counties Doberman Society
North Eastern Old English Sheepdog Club
North Western Old English Sheepdog Club
Northern Counties American Cocker Spaniel Club
Northern Counties Welsh Corgi Society
Northern English Sprinter Spaniel Society
Northern King Charles Spaniel Club
Northern Rottweiler Club
Northern Schnauzer Club
Notts & Derby District Staffordshire Bull Terrier club
Old English Sheepdog Breed Council
Old English Sheepdog Club of Northern Ireland
Old English Sheepdog Club of Scotland
Old English Sheepdog Club of Wales
Pennine Welsh Corgi Association
Polish Lowland Sheepdog Club
Poodle Club
Rottweiler Club
Rough Collie Breed Council
Russian Black Terrier Club (UK)
Scottish Boxer Club
Sealyham Terrier Breeders Association
Sealyham Terrier Parent Club
Smooth Fox Terrier Association
Solid Colours Cocker Spaniel Association
South East Corgi Association
South East of England Doberman Club
South Eastern Old English Sheepdog Club
South Eastern Welsh Springer Spaniel Club
South West Doberman Club
South Western Boxer Club
South Western English Springer Spaniel Club
South Western Poodle Club
Southern Counties Australian Terrier Club
Southern English Springer Spaniel Society
Spaniel Club
Sporting Lucas Terrier Club
Trent Boxer Club
Tyne Wear & Tees Boxer Club
United Spaniel Association
Utility Gundog Society Eastern Counties Branch
Weimaraner Association
Weimaraner Club of Great Britain
Weimaraner Club of Scotland
Welsh Corgi League
Welsh Doberman Club
Welsh Springer Spaniel Club
Welsh Springer Spaniel Club of South Wales
West Midland Field Trial Society

West of England Corgi Association
Westward Gundog Society
Winuwuk Boxers
Wire Fox Terrier Association
Working Clumber Spaniel Society

ANALYSIS OF REPLIES FROM DOG BREED SOCIETIES

All 113 submissions related to the issue of banning tail docking. All submissions were against a ban on tail docking. It should be appreciated that these organisations represent at least 12,744 people as not all organisations gave their membership numbers.

The main arguments put forward against a ban on tail docking were:

- Over 60 breeds would be affected as a result of a ban. Characteristic appearance and heritage would be lost.
- Breed standards, based on aesthetics, would be lost.
- Certain breeds are easier to groom and keep clean in a docked state, preventing, in worst case scenarios, flystrike.
- Docking benefits animal welfare by reducing the risk of injury to working dogs that often enter rough cover.
- Tail injuries caused in the field often result in the amputation of the adult dogs tail, requiring general anaesthetic and long recovery period.
- Pain caused by docking puppies at a very early age is negligible.

In addition to commenting on tail docking:

5 submissions also gave general support to the bill.

2 disagreed with placing restrictions on animals being produced that may be genetically defective.

3 agreed that there should be a new “likely to cause unnecessary suffering” offence.

2 agreed that Police powers should be increased during investigation.

1 agreed that the time allowed for proceeding to be brought to court should be extended, that minimum age to buy pets should not be increased, that circus winter quarters should be licensed, that pet shops should not sell dogs, that the powers of arrest in the 1911 Act regarding animal fighting should be extended, that sentences for animal welfare offences should be increased and that animal sanctuaries should be licensed.

ANALYSIS OF REPLIES FROM BIRD CLUBS

List of organisations

Alfreton & District Cage Bird Society
Annan Cage Bird Society
Black Country Foreign Bird Club
Border Convention
British Bird Council
Canary Council for Great Britain & Ireland
Clackmannanshire Cage Bird Society
Croydon & District Budgerigar Society
Diss & District Cage Bird Society
East Midlands Bird Breeders Association
Exeter Budgerigar and Foreign Bird Society
Fife Fancy Federation
Foreign Bird Association
Grangemouth Cagebird Society
Heanor & District Pigeon Flying Club
Isle of Thanet Bird Club
Kent Federation of Cage Bird Societies
Leicester Society of Aviculture
Lizard Canary Association of Great Britain
London & Home Counties British Bird and Mule Club
London & Southern Counties Budgerigar Society
Manchester & Northern Foreign Birds Society
National Council for Aviculture
National Council of Aviculture, Canary Council & Yorkshire
National Pigeon Association
Newark & District Cage Bird Club
Northern Budgerigar Society
Parrot Society UK
Partick & District Cage Bird Club (Glasgow)
Scottish Norwich Canary Plainhead Society
Severn Counties Foreign and British Bird Society
Southern Counties Fife Club
Southern Yorkshire Canary Club
Tadcaster & District Cage Bird Society
Urmston & District Avicultural Society
Walthamstow & Chingford Cage Bird Society
Welsh Homing Pigeon Union
Wessex Border Club
West Wales BFCC
West Wales Fife Fancy Canary Club
Yorkshire Canary Club
Yorkshire Canary Club of Scotland
Yorkshire Foreign Bird Society

ANALYSIS OF REPLIES FROM BIRD CLUBS

43 Bird clubs responded to the consultation. The table below indicates what issues were commented on and the number of clubs that commented on each issue. Below the table are typical comments that were made.

Issue	Total responses	Yes	No	Other
Should there be greater regulatory control over pet fairs?	32	2	30	0
Should there be a new offence of "likely to cause unnecessary suffering?"	14	0	11	3
Should there be greater regulatory control over buying and selling of exotic or dangerous animals?	12	2	10	0
Increase powers available to police when investigating allegations?	11	2	9	0
Increase time allowed for proceedings to be brought to court?	12	0	12	0
Increase sentences?	9	1	8	0
Should the minimum age at which children can buy pets be raised?	7	6	0	1
Should live animals be sold in pet shops?	7	7	0	0
Should the Secretary of State create Codes of Recommendation?	6	2	4	0
Should it be an offence for breeders to produce an animal that is genetically defective?	2	0	2	0
Should animal sanctuaries be licensed?	3	2	1	0

Should there be greater regulatory control of pet fairs?

No

- Pet fairs allow breeders to make small amount of money to finance their hobby.
- Already great concern for animals welfare.
- Means to sell off excess stock.
- Place to share information.

Yes

Better than the network of buying and selling animals moving underground.

Create a new offence of "likely to cause unnecessary suffering?"

No

- Cannot be guilty before an offence has been committed.
- Needs clarification.

Greater regulatory control over the buying and selling of exotic or dangerous animals?

No

- Clearly separate dangerous and exotic. Dangerous Wild Animals Act covers dangerous animals and has recently been reviewed.
- Would affect thousands of people.
- No scientific or rational reason to specify this group of animals.

Yes

- Lack of understanding of specific needs of care.

Increase police powers when investigating an allegation?

No

- Current are adequate and proportionate to other crimes.

Increase time allowed for proceedings to be brought to court?

No

- Current is adequate. Evidence should be available straight away. Stress caused if process is prolonged.

Increase sentences?

No

- Current are adequate and proportionate to other crimes.

Should the minimum age at which children can buy pets be raised?

Yes

- 16 was the preferred age of most of the respondents to this question.

Should live animals be sold in pet shops?

Yes

- Thousands of livelihoods could be lost. Individuals and small businesses should not be compromised at the behest of a minority.
- Sale already sufficiently restrictive.

Should the Secretary of State create Codes of Recommendation?

- Need balance of input strictly focused on proven problems and not generalised.
- Need clarification.

Should it be an offence for breeders to produce an animal that is genetically defective?

- Many current breeds would be lost.
- Many hybrids produced are sterile and so could not pass on genetic defects.

Should animal sanctuaries be licensed?

- Some are misguided, inefficient, under funded or otherwise unsuitable for their claimed function.

ANALYSIS OF REPLIES FROM INDIVIDUAL VETERINARY SURGEONS

33 responses received were from individual veterinary surgeons. The table below indicates which issues were raised and how many commented on each issue. Below the table are typical comments that were made.

Issue	Number of responses	Yes	No	Other
Should tail docking be banned?	29	13	15	1
Should there be greater regulatory control over the buying and selling of exotic animals?	10	6	4	0
Should it be an offence for breeders to produce an animal that is likely to be genetically defective?	8	4	2	2
Should animal sanctuaries be licensed?	6	4	2	0
Create a new offence of "likely to cause unnecessary suffering?"	6	3	1	2
Should livery yards be licensed?	5	2	3	0
Should there be greater regulatory control of pet fairs?	4	2	2	0
Should the use of electronic prods be banned?	4	1	2	1
Should police powers be increased when investigating allegations?	4	0	4	0
Increase time allowed for proceedings to be brought to court?	4	2	2	0
Does existing law provide adequate protection for pheasants reared for sport shooting?	3	2	0	1
Should the Secretary of State produce Codes of Recommendation?	4	2	1	1
Should the use of animals in circuses be banned?	4	3	1	0
Should circus winter quarters be licensed?	4	3	1	0
Should the power of arrest in the 1911 Act be extended regarding animal fighting?	4	3	1	0
Increase sentences?	3	1	2	0
Should the sale of animals in pet shops be banned?	1	0	0	1

Should tail docking be banned?

Yes

- Implausible arguments used for docking.
- Short term effects - pain, bleeding and infection.
- Long term effects – neural pain locally at site of amputation and phantom pain.
- Behavioural effects – unable to signal to other dogs their intentions, aggressive or conciliatory.
- Misconception that new born do not feel pain as do older animals. Pain inflicted is not only perceived but can sensitise the nervous system so that the animal can become more reactive to pain in the future.

No

- Prevents injury during work and sports activities.

- As valid as docking lambs and piglets.
- Need to ban dew claw removal, castration and other mutilations to be ethically consistent.

Other

- Restricted to working dogs at risk from injury.

Should there be greater regulatory control over the buying and selling of exotic or dangerous animals?

Yes

- Often kept in unsuitable conditions.
- Ignorance on requirements of care.

No

- Dangerous animals already covered by the Dangerous Wild Animals Act
- Most pets could be classified as exotic.

Should it be an offence for breeders to produce an animal that is genetically defective?

Yes

- Need to define “genetically defective” and “genetically modified”.
- Difficult to draw a line between normal and defective.

No

- Not if advance would provide welfare benefits.

Should animal sanctuaries be licensed?

Yes

- For those above a certain size.
- Opportunities for welfare to be compromised unless competent authority able to inspect and approve.
- Animal hoarders need psychiatric help.

No

- Will cause an increase in number of civil servants and therefore tax.

Create a new offence of ‘likely to cause unnecessary suffering’?

Yes

- Could include overfeeding against the advice of a veterinary surgeon.
- Vets can monitor cases but are not allowed to report cases without breaching RCVS rules on confidentiality.

No

- Needs clarification.

Should livery yards be licensed?

Yes

- Opportunity for welfare to be compromised unless inspected by a competent authority.

No

- People are free to choose where they keep their horses.

Should there be greater regulatory control over pet fairs?

Yes

- When selling commercially should comply with PCT Pet Care Charter and LGA Guidelines.

No

- No argument given.

Should the use of electronic prods be banned?

Yes

- Enough knowledge and training for this method to be outdated.

No

- No argument put forward.

Increase police powers when investigating allegations?

No

- Current are adequate.

Increase time allowed for proceedings to be brought to court?

Yes

- Convictions can be lost through time factor.

No

- Current adequate.

Does existing legislation provide adequate protection for pheasants reared for sport shooting?

- Should be comparable with farmed animals.

Should the Secretary of State produce Codes of Recommendation?

Yes

- Should continue to be advisory but consistent.

No

- Animal welfare is common sense - those without it will not read codes.

Should the use of animals in circuses be banned?

Yes

- In relation to exotic animals and if not banned should be monitored regularly.

No

- No argument given.

Should circus winter quarters be licensed?

Yes

- Along the lines of the Zoo Licensing Act.
- Ban exotic animals.

No

- No argument given.

Should the powers of arrest in the 1911 Act be extended in relation to animal fighting?

Yes

- Those present have committed an offence.

No

- No argument given.

Increase sentences?

Yes

- A person banned from keeping animals should not be able to nominate custodian.

No

- No argument given.

Should the sale of live animals from pet shops be banned?

- Staff should have completed an animal husbandry course before working in pet shops.

ANALYSIS OF PETITIONS RECEIVED

Club	Issue
American Cocker Spaniel Club of Great Britain	Tail docking by veterinary surgeon should not be made illegal.
Ammanford Cage Bird Society	Relating to birds, feels that we shouldn't be in consultation with the RSPCA, Born Free or any animal welfare groups - as they don't believe in keeping birds as pets, but pet birds are bred in captivity and so do not know any different.
Anti-Docking Alliance	Ban tail docking
Birmingham Aviculture Society	Consider the implications of too radical changes in the Animal Welfare Bill
Dover & District Bird Club	The welfare of birds at Pet Fairs. Changes in the law to guard against cruelty of birds.
The Isle of Wight Animal Preservation & Action Group	To stop the trade in ostriches, rheas and emus and from them being taken from their natural environment.
The Monkey Sanctuary Trust	A ban on the keeping of exotic and dangerous animals as pets in the UK.
National Council for Aviculture	Against a ban on pet fairs, increase the age at which children can buy pets, exotic animals, creating a new offence of "likely to cause unnecessary suffering", increase powers available to police, increase sentences, increase time allowed for proceedings to be brought before a court and the mis-use of bio-technology in animal breeding.
Preston & District Avicultural Society	Doesn't want to see any changes to the current legislation that may infringe on their rights to keep and breed birds.
Prevent Unwanted Pets	A ban on fireworks that create noises that cause distress or are dangerous in any way.
Reptilian Magazine	Do not place unnecessary or restrictive regulations on the buying, selling and possession of exotic animals.
South East Canary Club	They would like to keep their hobby without any interference.
Thanet Bird Club & Friends	Feels that no changes in the law are needed.

SUMMARY OF RESPONSES FROM ORGANISATIONS

In order to give a balanced reflection on the issues raised in the consultation, we have placed the organisations into groups, according to the nature of their interest. The following four pages provide a list of the organisations that responded, together with the group that they have been placed in, as well as the appropriate page number. Placing the organisations into groups has facilitated comparisons with similar interest groups.

ALPABETICAL LIST OF ORGANISATIONS THAT RESPONDED

Organisation	Interest group	Page
All Party Group for Animal Welfare (Wales)	Parliamentary	147
Anglican Society for the Welfare of Animals	Religious & Ethical	156
Animal Aid	Animal Welfare	85
Animal Defenders & National Anti-Vivisection Society	Circus	108
Animal Welfare Federation of Northern Ireland	Animal Welfare	86
Animal Welfare Inspection Services	Animal Welfare	86
Animals Asia Foundation	Animal Welfare	87
Animals in Mind	Non-Farmed Commercial	141
Anti-Docking Alliance	Dog	112
Arab Horse Society	Horse	131
Ark Group.org	Fish, Aquatics & Reptilia	124
Associate Parliamentary Group for Animal Welfare	Parliamentary	148
Association for the Study of Reptilia and Amphibia	Fish, Aquatics & Reptilia	124
Association of British Riding Schools	Horse	131
Association of British Wild Animal Keepers	Animal Welfare	87
Association of Chief Police Officers	Police	151
Association of Circus Proprietors	Circus	109
AstraZeneca	Non-Farmed Commercial	141
Barnet Association of Responsible Dog Owners	Dog	112
Bat Conservation Trust	Animal Sanctuary	81
Battersea Dogs Home	Dog	112
BioIndustry Association	Non-Farmed Commercial	141
Birding World	Captive Bird	98
BirdsFirst in Birdkeeping	Captive Bird	98
Birdymad	Captive Bird	98
Blue Cross	Animal Welfare	87
Blackpool Zoo	Non-Farmed Commercial	141
Born Free	Circus	109
British Association for Conservation and Shooting	Game	128
British Egg Industry Council	Farmed Animal	117
British Equine Veterinary Association	Professional Veterinarian	153
British Goat Society	Cat & Other Domestic Mammal	101
British Hedgehog Preservation Society	Animal Sanctuary	81
British Horse Society	Horse	131
British Horse Society Scotland	Horse	131
British Koi-Keepers' Society	Fish, Aquatics & Reptilia	125
British Poultry Council	Farmed Animal	117
British Small Animal Veterinary Association	Professional Veterinarian	153
British Veterinary Association	Professional Veterinarian	153
British Wildlife Rehabilitation Council	Animal Sanctuary	81
Cage & Aviary Birds	Captive Bird	98
Canine Crisis Council	Dog	112
Captive Animals' Protection Society	Circus	110
Cat Association of Britain	Cat & Other Domestic Mammal	101
Catholic Study Circle for Animal Welfare	Religious & Ethical	156
Chartered Institute of Environmental Health	Local Authority	137
Companion Animal Behaviour Therapy Study Group	Academic	76

Companion Animal Welfare Council	Animal Welfare	87
Compassion in World Farming	Farmed Animal	117
Council of Docked Breeds	Dog	112
Country Land and Business Association	Farmed Animal	118
Countryside Alliance	Farmed Animal	118
Dartmoor Pony Society	Horse	132
DEFRA - Farm Focus	Central Government	104
DEFRA - State Veterinary Service (Stafford Division)	Central Government	104
DEFRA - State Veterinary Service (Surrey, Kent, East and West Sussex)	Central Government	104
DEFRA - State Veterinary Service (Surveillance Team)	Central Government	105
DEFRA - State Veterinary Service (West) Cornwall Wildlife Liaison Group	Central Government	105
DEFRA - State Veterinary Service (West) Gloucester Division	Central Government	105
DEFRA - Veterinary Fisheries Aquatic Surveillance	Central Government	105
DEFRA - Wildlife, Countryside and Flood Management Directorate	Central Government	106
Devon Horse & Pony Society	Horse	132
Direct Line	Non-Farmed Commercial	142
Dobson, Mrs Jennifer	Non-Farmed Commercial	142
Donkey Breed Society	Cat & Other Domestic Mammal	101
Dorset Animal Welfare Group	Animal Welfare	88
Endangered Dogs Defence & Rescue Ltd	Dog	112
Equestrian Support Services	Horse	132
Farm Animal Welfare Council	Farmed Animal	119
Farm Animal Welfare Network	Farmed Animal	120
Farriers Registration Council	Horse	132
Feline Welfare	Cat & Other Domestic Mammal	102
Fife Animal Welfare Network	Animal Welfare	89
Focus	Non-Farmed Commercial	143
Friends, Families & Travellers	Horse	132
Friends of Animals	Animal Welfare	89
Game Conservancy Trust	Game	128
Game Farmers' Association	Game	128
Gamekeepers National Association	Game	128
Governing Council of the Cat Fancy	Cat & Other Domestic Mammal	102
Greyhound Rescue Wales	Dog	112
Greyhounds UK	Dog	113
Guide Dogs for the Blind Association	Dog	113
Halal Food Authority	Farmed Animal	120
Heythrop Zoological Gardens Ltd	Circus	110
Home Office - Police Leadership & Powers Unit	Central Government	106
Humane Society of the US (Research & Education Outreach)	Non-Farmed Commercial	143
Independent Weimaraner Rescue & Re-Homing Service	Dog	113
International Fund for Animal Welfare	Animal Welfare	89
International Herpetological Society	Fish, Aquatics & Reptilia	125
International League for the Protection of Horses	Horse	133
International Otter Survival Fund	Animal Sanctuary	81
Justice for Dogs	Dog	113
Kennel Club	Dog	113

League Against Cruel Sports	Animal Welfare	90
Local Authorities Co-ordinators of Regulatory Services	Local Authority	139
Lord Chancellor's Department - Civil Issues Branch	Central Government	106
Mayhew Animal Home	Animal Sanctuary	81
Meat and Livestock Commission	Farmed Animal	120
National Angora Club	Cat & Other Domestic Mammal	102
National Animal Sanctuary Alliance	Animal Sanctuary	82
National Animal Welfare Trust	Animal Welfare	91
National Association of Registered Petsitters	Non-Farmed Commercial	143
National Canine Defence League	Dog	113
National Farmers Union	Farmed Animal	121
National Federation of Badger Groups	Animal Sanctuary	83
National Forum of Professional Dog Users	Dog	114
National Gamekeepers Organisation	Game	129
National Mouse Club	Cat & Other Domestic Mammal	102
National Pig Association	Farmed Animal	121
National Pony Society	Horse	133
National Secular Society	Religious & Ethical	157
Naturewatch	Animal Welfare	91
New Life Parrot Rescue	Captive Birds	99
North Kent Animal Welfare	Animal Welfare	91
Ornamental Aquatic Trade Association Limited	Fish, Aquatics & Reptilia	125
People's Dispensary for Sick Animals	Animal Welfare	92
Pet Advisory Committee	Animal Welfare	92
Pet Care Trust	Non-Farmed Commercial	144
Pet Parrot Appreciation Club Wales - UK	Captive Birds	99
Pit Pony Sanctuary	Horse	133
Police Federation of England and Wales	Police	151
Pro Dogs	Dog	114
Professional Koi Dealers Association	Fish, Aquatics & Reptilia	125
Protect Our Wild Animals	Animal Welfare	93
Rabbit Welfare Association	Cat & Other Domestic Mammal	102
Radio Systems	Non-Farmed Commercial	144
Reptillian Magazine	Fish, Aquatics & Reptilia	126
Research Defence Society	Academic	76
Respect for Animals	Animal Welfare	93
Rhondda Animal Aid	Animal Welfare	93
Rolf C Hagan (UK) Ltd	Non-Farmed Commercial	145
Rona Brown & Associates/Animal Filming & Tr Commission	Circus	110
Roslin Institute (Edinburgh)	Academic	76
Royal Agricultural Society	Farmed Animal	121
Royal College of Veterinary Surgeons	Professional Veterinary	154
Royal Society for the Prevention of Cruelty to Animals	Animal Welfare	93
Safewings	Animal Sanctuary	83
Scammonden Boarding Kennels	Non-Farmed Commercial	145
Scottish Agricultural College	Academic	76
Scottish Executive - Justice Department (Criminal Procedure Division)	Central Government	106
Scottish Landowners' Federation	Farmed Animal	122
Scottish Society for the Prevention of Cruelty to Animals	Animal Welfare	95

Shetland Pony Stud-Book Society	Horse	134
Society for Companion Animal Studies	Academic	76
Society for the Welfare of Horses and Ponies	Horse	134
Soil Association	Farmed Animal	122
Song Bird Survival	Animal Sanctuary	83
South West Equine Protection	Horse	134
Spotted Horse & Pony Society	Horse	134
Thoroughbred Breeders Association	Horse	135
Thoroughbred Rehabilitation Centre	Horse	135
Union of Country Sports Workers	Game	129
Union of Greyhound Owners	Dog	115
Universities Federation for Animal Welfare	Academic	76
University of Aberdeen	Academic	77
University of Birmingham	Academic	77
University of Bristol	Academic	78
University of Kingston	Academic	78
University of Lincoln	Academic	79
University of London	Academic	79
Vegetarian Economy and Green Agriculture	Farmed Animal	122
Verderers of the New Forest	Farmed Animal	122
Wales Opponents of Pheasant Shooting	Game	129
Watford Animal Group	Animal Welfare	96
West Sussex Wildlife Protection	Animal Welfare	96
Woburn Safari Park	Non-Farmed Commercial	145
York Canine Association	Dog	115

THE ACADEMIC INTEREST

Some common themes

- Reform of our animal laws is long overdue.
- Delegated legislation will allow the law to adapt to rapidly changing circumstances.
- Simplify the way that our laws are enforced.
- Inconsistencies and differences in enforcement practice need to be tackled.

Some quotes from the responses

- The present consultation is a once-in-a-generation opportunity to establish an effective and durable legislative framework. It is greatly to be hoped that Ministers will take this matter forward.

Mike Radford, University of Aberdeen

- Any new legislation must consider the behavioural as well as the physical welfare of each species affected. In our opinion, the meeting of basic physical needs (food, water, shelter, etc.) is no longer sufficient given the wealth of research available on the behavioural welfare of most companion animals.

Companion Animal Behaviour Therapy Study Group

- The general requirements of a new Animal Welfare Bill should include these basic requirements, such as housing, veterinary treatments, inspection, behavioural freedom, breeding procedures, food and water, for all domestic and captive animals.

Department of Clinical Veterinary Science, University of Bristol

- In the interests of both consistency and effectiveness, it is desirable that the law should require those enforcing its provisions to be able to demonstrate an up-to-date knowledge and understanding of the relevant legislation, the nature and extent of the legal powers they are exercising, and the developing science of animal welfare.

Mike Radford, University of Aberdeen

- It is urged that, in principle, some form of licensing, registration or certification intended to promote animal welfare should be considered in relation to all commercial activities involving animals, as well as to the operation of animal sanctuaries and shelters.

Mike Radford, University of Aberdeen

THE ACADEMIC INTEREST

Companion Animal Behaviour Therapy Study Group (an affiliate of BSAVA)

Scope of the Animal Welfare Act	The Act should cover behavioural as well as physical welfare. Legislation must be accompanied by education. The focus should be on prevention not prosecution.
Sentences	Should reflect the well recorded relationship between people and companion animals.
Powers to investigate and prosecute	Should be increased.
Scope of licensing	Any organisation that sells animals should be licensed.
Power given to enforcement authorities	Should be increased but animals must not be confined or removed without good cause.

Research Defence Society (Understanding Animal Research in Medicine)

Mis-use of bio-technology	It would be extremely difficult and probably very unwise to attempt to write anything like this into legislation. The main problem would be the difficulty in defining 'genetically defective' in a way that would not include a very large number of animals, which are currently bred for a variety of purposes in a way that is, regarded as perfectly satisfactory. Society has been genetically modifying animals by selecting and breeding natural mutants for many thousands of years.
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Roslin Institute (Assistant Director (Science) Dr Harry Griffin)

Mis-use of bio-technology	The question in the Consultation Letter is poorly worded. It should read 'It should be an offence for breeders to sell a genetically modified animal where the genetic modification leads to a demonstrable decrease in the welfare of the animal.'
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Scottish Agricultural College

Pheasants bred for sporting shooting	The Agricultural (Miscellaneous Provisions) Act 1968 should apply.
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Society for Companion Animal Studies

To take forward animal welfare	The government should: Develop a better understanding of human animal interactions Introduce training on the human animal bond to those in the health and social care professions Introduce Humane Education to the national curriculum Encourage the introduction of planned Animal Assisted Therapy Enact positive rules in housing legislation with guidelines on the keeping of companion animals
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Universities Federation for Animal Welfare

Review	Agree that there is a need to review animal welfare legislation.
New legislation	Should be flexible to allow for advancement in understanding of animals' needs by use of secondary legislation (i.e. Zoo Licensing Act 1981 and Animals (Scientific Procedures) Act 1986). Should encompass the welfare of <u>all</u> animals used, bred or kept or which we may interact in the wild. This would maintain high standards in all sectors (e.g. New Zealand Act). Possibly based on five freedoms. Should not lose any existing valuable provisions.
Liaison/Advisory Body	National advisory body on welfare and ethics of animal use to keep under review the various issues across all sectors and liaise with existing bodies (e.g. CAWC, FAWC, APC, Zoos Forum) to achieve consistency and advise government.
Circuses	Licensing system similar to that operated under Zoo Licensing Act 1981.
Captive bred pheasants for sport	Should be comparable with other farmed stock.

Tail docking	All such mutilations should be banned except where there is a clinical need.
Licensing of Animal Sanctuaries	Question currently being addressed by CAWC. Licensing for those above a certain size is the ideal.
Miss-use of biotechnology in animal breeding	The production of animals whose welfare is compromised should not be permitted either by modern genetic modification techniques or by selective breeding for particular traits.

University of Aberdeen (Mike Radford)

The shape of the Animal Welfare Bill	<p>The Act should focus on defining general principles, duties, responsibilities, and powers, and that detailed provisions should be introduced (and amended) by means of other instruments under the authority of the parent Act, whether by means of secondary legislation, statutory codes of practice, recommendations or guidance, or administrative measures.</p> <p>The legislation should apply to all mammals, birds, fish, and reptiles, regardless of the circumstances in which they are living. This includes wild animals. This has already been done in the Welfare of Animals (Northern Ireland) Act 1972.</p>
Definition of man's responsibility to prevent suffering	<p>There should be a general prohibition on any person treating any animal cruelly, or otherwise procuring or causing such cruelty. However, where a person has a closer relationship with an animal, as its owner, keeper, or occupier of premises at which it is kept, or the officer of a company which is answerable for its treatment, then the legal responsibility should be significantly more extensive. This should include, first, a duty to take all steps to prevent the animal being subjected to cruel treatment; and, second, and a duty to take reasonable steps to ensure its welfare.</p> <p>Owners and keepers should have a positive, non-delegable, legal duty to exercise reasonable care and supervision in order to prevent the animal suffering unnecessarily. To include:</p> <ul style="list-style-type: none"> • Proper care and attention at all times; • A wholesome and suitable diet, including the supply of water; • A safe living environment; • An environment appropriate to the behavioural and physiological needs of the animal. <p>There will be a duty of care with regard to the selection of an animal for breeding to ensure no unnecessary suffering. This includes the welfare of offspring.</p> <p>The emphasis on promoting welfare should extend to public bodies.</p> <p>In the case of an animal owned by a child, the head of the household should be regarded as the keeper.</p>
Definition of cruelty	The definition in the 1911 Act of what constitutes cruelty could be greatly simplified by having a single offence, based on the existing second limb of section 1(1)(a) of the 1911 Act, subject to the provisions relating respectively to fighting and baiting, poisons and injurious substances, and the carrying out of operations being made offences in their own right.
The extension of the licensing system	<p>Some form of licensing, registration or certification intended to promote animal welfare should be considered in relation to all commercial activities. It is an anomaly that a person who breeds dogs on a limited scale requires a licence whereas a livestock farmer or keeper does not.</p> <p>Many of the older licensing schemes, particularly those concerned with companion animals, are in urgent need of updating. They do not allow local authorities adequately to ensure the welfare of the animals involved.</p> <p>Moreover, there is no provision in the legislation to introduce advisory or mandatory standards by means of regulations or codes of guidance. As a result it is left to each individual authority to define standards.</p>
Enforcement	Enforcers should be independent, trained and have the relevant knowledge and expertise.
The courts	The powers provided to the courts should be designed and exercised in such a way as to give priority to the welfare of the animals concerned.

University of Birmingham (Head of the Centre for Biomedical Ethics)

Unnecessary suffering	A defendant who tries to argue that the suffering was necessary should have to explain why, if there were better practices/methods they were not used. The Bolam Test that emphasises what a good animal keeper would do in a particular set of circumstances would be helpful in this context.
Codes of Practice	Would be helpful.
Tail docking	There is increasing evidence that young animals feel pain. A close look is therefore needed at mutilations of all kind. Docking and removal of dew claws should be banned for cosmetic purposes.

Council of Europe Convention for the Protection of Pet Animals	Should be signed.
Genetic modifications	The Act should be prepared for developments such as the fluorescent rabbit and farm animals bred with an extra leg to improve its commercial value.

University of Bristol (Bristol Veterinary School)

General requirements for all animals	An Animal welfare Act should include these basic requirements such as housing, veterinary treatment, inspection, and behavioural freedom. Breeding procedures and food and water for all domestic and captive animals. The Welfare of Farmed Animals Regulation 2000 provides positive requirements for meeting the behavioural and physiological needs of farmed animals. Although spreading the WFAR to domestic animals could lead to anomalies, e.g., it could be illegal to look into the breeding strategies of many pedigree dogs.
Enforcement	Inconsistencies and differences in enforcement practice need to be tackled. National guidelines and appropriate training in the relevant species could help to overcome this.
Powers of entry and improvement Notices	Both desirable. Standardisation of powers of entry would be hotly debated before an Animal Welfare Bill could become law.

University of Kingston (Dr J Cuthbert, Faculty of Science)

Suggested detailed amendments to the legislation under review	See Dr Cuthbert's reply for details.
Should powers of entry, search and seizure be extended?	Yes.
Should maximum sentences be increased?	No.
Should there be Codes of Recommendation?	Yes.
Should electronic prods be banned?	Yes.
Should it be an offence to produce an animal that will not be used for scientific research but is genetically defective in some way?	Yes.
Should there be a licensing system for circus winter quarters?	Ban animals in circuses.
Should the minimum age at which children can buy pets be raised?	Yes. 16 is the minimum age. Greater regulatory control over pet shops is needed. A 'Contract of Good Care' should be mandatory with each pet shop.
Does the existing law provide adequate protection for captive pheasants that are being bred for sporting shooting?	No.
Should there be greater controls over the buying and selling of exotic or dangerous animals?	Yes.
Should the docking of tails be banned?	Yes.
Should there be a new offence of likely to cause unnecessary suffering?	Yes.
Should the powers available to the police be increased?	Yes.
Should animal sanctuaries be licensed?	Yes, but it should not discourage the efforts of the smaller sanctuaries.
Handling of non-tame invertebrates by the public	Should not be allowed.
Tethering of dogs for more than 1 hour per day	Should not be allowed.
Keeping of animals in overcrowded conditions	Densities should be set.
Invertebrates	Welfare considerations, in general, should be extended to invertebrates.

Should it be made an offence not to take action when an animal (domestic or wild) is known to be suffering?	This needs to be considered.
Should it be an offence to cause an animal to become captive without water, etc., e.g., trapping wild birds, etc.	More could be done to improve the welfare of animals that have been captured.

University of Lincoln (Daniel Mills, BVSc, MRCVS, Principal Lecturer Animal Behaviour, Cognition and Welfare Group)

Pet shops	Concern about the high rate of mortality among animals sold from pet shops. Raise the minimum age of purchasers to 16. Also set a minimum age for vendors. There may be a case for a formal minimal level of qualification for staff working in pet shops. There should be a mandatory requirement for advice on the needs of any animal purchased. Review anomalies in the Dangerous Wild Animal Acts, e.g., the need for regulating wolf/dog hybrids. Regulate toys made for animals.
Tail Docking	There should be more research before any legislation is passed.
Should animal sanctuaries be licensed?	Yes.
Should livery yards be licensed?	Yes.
Training Aids	Ban electronic prods. There are better alternatives. Shock collars and other apparatus from which the dog is unable to escape should also be banned. DEFRA should also become involved with the ASAB initiative for a certification scheme for animal behaviourists
The mis-use of biotechnology	Action in this area is an attractive option but there may be enforcement problems. There may also be a need for regulating multiple caesarean sections.
A new offence of 'likely to cause unnecessary suffering'	May be difficult to enforce.
The legal process	Provide a power of arrest for those attending animal fights. Increase maximum sentences. Increase the time allowed for bringing proceedings. Make use of Codes of Recommendation.

University of London (Prof H C Penny, BVSc PhD DVSc DPM FACVSc FRCVS)

Tail docking	Should not be banned because of potential tail injury to some working dogs; and ban would eventually lead to banning docking of pigs tails. Other mutilations are accepted (dew claws), why not tail docking. Pig tail biting is well documented. Farmers already have to work under strictest welfare rules of any country. Any more restricts will put future at risk. More regulation will encourage more imports where welfare standards are lower than in UK.
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THE ANIMAL SANCTUARY INTEREST

Some common themes

- Animal Sanctuaries should be regulated but some organisations would prefer self-regulation.
- There is support for Codes of Recommendation but they should only be promulgated after a wide consultation process.

Some quotes from the responses

- Previous consultation with colleagues who run hospitals for bats have indicated that they would welcome statutory regulation of rescue centres and animal hospitals, as they feel that the number of prosecutions for animal cruelty prove that self regulation does not work. However, they have all pointed out that bats - wild animals about which relatively little is known - present unique problems when attempting to create legislation that includes them with familiar domestic animals.

The Bat Conservation Trust

- Registration would be the preferred option of the British Hedgehog Preservation Society. With for example hedgehogs, an umbrella organisation could hold a register of hedgehog carers (as indeed the BHPS already does - regardless of the number of hedgehogs taken in). However this could only be a basic register as the BHPS does not have the resources or the expertise to inspect premises. This would probably be the case for other umbrella groups as well. The RSPCA already has in place an inspection scheme whereby it inspects any wildlife unit to which it directs members of the public.

British Hedgehog Preservation Society

- With regard to the proposals for the Bill, our major concern relates to the licensing of animal sanctuaries; if indeed, wildlife rehabilitation units are to be regarded as animal sanctuaries. Although, Council members are generally in favour of some degree of regulation of such rehabilitation units, the main concern is that excessive regulation and the cost of licensing might force well-run, smaller units to close. The loss of such units would compromise the welfare of wildlife casualties by reducing the availability of assistance to members of the public when faced with an emergency.

British Wildlife Rehabilitation Council

- There are so many people who 'love' animals and so wish to take in casualties but they treat them as a domestic animal which results in a tame wild animal. This is a serious problem.

International Otter Survival Fund

ANIMAL SANCTUARY INTEREST

Bat Conservation Trust

Should animal sanctuaries be licensed?	Yes. But there is concern over the expertise of the local authority officials carrying out the inspection. There is also concern about the ability of the sanctuary to pay for inspection. There is also concern about the practicability of rehabilitation. Bats reared in captivity are not always suitable for release.
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British Hedgehog Preservation Society

Should there be a new offence of likely to cause unnecessary suffering?	Yes.
Should animal sanctuaries be licensed?	The cost of a licence could force many smaller sanctuaries out of business. A preferred option would be for national organisations to maintain a list of local carers but this would not necessarily overcome the need for inspection which may not always be possible.
The release of animals into the wild.	The care that needs to be taken with rehabilitation could be addressed in legislation.
Should the Secretary of State be given powers to make Codes of Recommendation?	Yes, but there will be a lot of differing needs with regard to animal sanctuaries.
The need to provide for the physiological needs of animals	This may not always be possible when a sanctuary is faced with an injured animal that needs immediate attention.

British Wildlife Rehabilitation Council

Should animal sanctuaries be licensed?	Yes, but there is concern over the ability of smaller sanctuaries to meet the licence fee. Some sort of voluntary scheme might be a solution.
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International Otter Survival Fund

How will an Act help?	The prime aim of some sanctuaries is rehabilitation. This means keeping personal contact to a minimum. How will legislation help with this objective?
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Mayhew Animal Home

Pet shops and pet fairs	Raise the age limit for animal purchase to 16 or 18. More stringent licensing standards to be undertaken by a Government Inspector designated for the task.
Exotic and dangerous animals	Stronger controls needed and a severe curtailment of the import of exotic species
Tail docking	It should be an offence to dock other than for medical reasons.
Likely to cause unnecessary suffering	Should be included in the Act.
Police powers and sentencing	Support the extension of police powers, the extension of certain powers to selected trained and rigorously monitored agencies, and the incorporation into the Act of sentencing guidelines, closing all current loopholes.
Upper time limit for reporting cases	Support an increase in case reporting time to 2 years.
Should animal sanctuaries be licensed?	Yes.
Other issues detailed in the consultation	Are supported.
Animal numbers	Limit the number of pets in circumstances where the owner cannot care adequately for them.
Animals living in poor conditions	New offences needed - 'In conditions likely to cause unnecessary suffering' or 'Conditions not conducive to their welfare.'
Breeding of cats	Should be regulated.
Psychological suffering	Legislation is needed to remedy severe forms of mental suffering undergone by animals in extreme circumstances.
Use of expert witnesses	There is a need to extend the scope of expert witnesses in the prosecution of an animal welfare offence.

National Animal Sanctuary Alliance

Should animal sanctuaries be licensed?	Try self-regulation to begin with.
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National Animal Sanctuary Alliance - Survey of the views of NASA Members

Animals in circuses	88% support a ban. 12% feel that animals in circuses might be OK with strict checks.
Should there be greater regulation of pet fairs?	74% said yes. 19% wanted a total ban. 7% were not sure.
Should the minimum age at which children can buy pets be raised?	81% said yes. 17% of the group mentioned 18 or 21 as the right age. 9% of the group mentioned 16 as the right age. 14% asked for a total ban on pet shops selling animals.
Does the existing law provide adequate protection for pheasants bred for sport shooting?	70% said no, with 47% adding that the sport should be totally banned. 28% didn't know or comment. 2% were content with the existing law.
Should there be greater controls over the buying and selling of exotic or dangerous animals?	84% support greater controls. 16% support a total ban on all sales.
Tail docking	93% support a ban. 7% do not want a ban.
The creation of a new offence of 'likely to cause unnecessary suffering'	88% want the 1911 Act revised. 10% are content with the 1911 Act. 2% don't know. NASA supports the creation of a new offence provided that an independent body and not the RSPCA who enforces it.
Increasing police powers when investigating allegations	70% support an increase or extension. 14% support changing/up-dating powers. 2% support taking in an expert. 2% thought it was already happening. 12% doesn't know/didn't comment. NASA members would not support a similar extension of powers to the RSPCA.
Should the power of arrest be extended to those present at animal fights?	98% said yes. 2% didn't know.
Are current maximum sentences adequate?	93% said no 2% support an increase for certain offences. 2% said they vary. 2% didn't know.
Should the time allowed for proceedings to be brought before a court be increased?	53% said yes. 2% wanted unlimited time. 26% disagree. 16% were not sure or did not answer. 2% wanted cases brought quickly.
Should there be Codes of Recommendation	72% say yes if expert knowledge including smaller organisations are consulted. 19% support unconditionally. 2% support if no fee charged. 5% didn't answer. 2% do not support it.
Should animal sanctuaries be licensed	75% of smaller sanctuaries said yes. NASA would like a self-regulatory system with no fees charged. RSPCA or SSPCA involvement would not be welcome.
Should livery stables be licensed?	81% said yes. 4% maybe. 2% probably. 9% no reply. NASA would not want fees charged.
Should electronic prods be used for training	98% said no.
Mis-use of biotechnology in animal breeding	NASA considers that GM animals should not be produced for any purposes.

National Federation of Badger Groups

Should animal sanctuaries be licensed?	Yes. A licence should take account of the expertise of the carers and facilities available. The licence should also be conditional on the procedures for rehabilitation including the control of spreading badger-related diseases.
Should there be a new offence of likely to cause unnecessary suffering?	Yes.
Should there be an increase in the powers available to the police and the courts?	Yes. Too many people are circumventing justice. The powers that need to be increased are entry, search, seizure, arrest, sentencing and the time allowed for proceedings to be brought.
Should the Badgers Act 1992 be included in the review?	Yes. There are weaknesses in the Act that need to be addressed.

Safewings

What needs to be done in drawing up legislation?	<ul style="list-style-type: none"> • Define sanctuary, e.g., funded/non profit making etc. • Define wild animal. • Consider separate classification and legislation for birds and for animals. • Separate classification and legislation between birds of prey and native wild garden birds. • Consider licensing costs and the type of sanctuary, e.g., profit or non-profit making. • RSPCA should be responsible for animal sanctuaries only. • RSPB and local veterinarians should be responsible for bird sanctuaries. • Consider the expertise of local authority inspectors. • Local authorities should licence their own premises when appropriate. • Safewings strongly object to compulsory public registration. • Registration with local vet practices would be more appropriate.
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Song Bird Survival

What DEFRA should do	Most of the points put forward are for EWD to consider, but there is concern about the breeding and subsequent release of captive raptors as this has an adverse effect on the songbird population.
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THE ANIMAL WELFARE GROUP INTEREST

Some common themes

- Campaign organisations see the prospect of a Bill as an opportunity to phase out animals in circuses, tail docking, pet fairs, pet shops, the keeping of exotic animals as pets, sporting shooting and electronic prods.
- There is widespread support for increased licensing controls, tougher sentencing (including life long bans on keeping animals), powers of entry search and seizure and increasing the time allowed for a case to be brought to court.

Some quotes from the responses

- Animal Aid calls for the game bird industry to be properly regulated under statute with regard to the welfare of birds it rears and shoots.

Animal Aid

- We support the development of a specifically trained and appropriately qualified novel animal welfare regulatory body, which would be responsible for all regulatory requirements of new and existing animal welfare legislation.

International Fund for Animal Welfare

- IFAW encourages the development of a mandatory-licensing scheme for ownership of all captive animals, as we feel that such initiatives have great potential to have a significant and positive impact on animal welfare.

International Fund for Animal Welfare

- FAWN believes that it is wrong to produce genetically modified animals for any purpose. Genetic engineering causes immense suffering to animals. Many of the experiments produce unpredictable results. Many thousands of animals die before or shortly after birth, others suffer from severe deformities, arthritis, or metabolic disorders. Genetically engineering animals just to produce more meat or milk is an even greater outrage.

Fife Animal Welfare Network

- All those in charge or control of or in control of an animal should owe a duty of care to it. A new additional offence should be created of breaching this duty of care.

RSPCA

THE ANIMAL WELFARE GROUP INTEREST

Animal Aid

Should there be 'goldplating' of EU Directives on farmed animals?	Yes. The Prime Minister's statement is regarded as retrograde.
Livestock markets	Need for a welfare league table of markets. Poor performers should either upgrade or be closed. Provide sufficient resources for enforcement.
Licensing of farms/training of animal handlers	The need for this is more urgent than the licensing of animal sanctuaries.
Intracardiac injections as a culling method	Should be banned.
Killing in the sight of others	Should be prohibited in any future culling exercise.
Farm mutilation and the competence of animal handlers	Concern over the competence of farm workers and the methods used in the mutilation of farmed animals.
Electric shocks used on rams	The use of an electric shock to extract semen is regarded as barbaric.
The welfare of captive pheasants being bred for sporting shooting	The game bird injury should be properly regulated. This includes the welfare of both captive and released birds.
Tail docking	Should be banned.
Enforcement action	Should be the responsibility of local authorities to investigate and bring cases, assisted by DEFRA vets.
Power to confiscate or prohibit ownership of animals	The law can be flouted and therefore needs to be revised.
Should there be a new offence of likely to cause unnecessary suffering?	Yes.
Increase investigative powers of police, powers of arrest, increased sentences and increased time to bring case to court.	Yes.
Codes of Recommendation	Yes.
Livery Yards	Should be licensed.
Using electronic prods for training	Should be banned.
The mis-use of biotechnology in animal training.	There is no justification for the production of genetically manipulated animals for scientific or medical research. Equally, there is no justification for the production of genetically manipulated animals outside the scientific/medical sector.
Welfare of race horses	The horse racing authorities should ensure that proper records are maintained and open to public inspection. DEFRA and/or local authorities should be assigned the enforcement duty with respect to offences of abandonment, neglect, cruelty and the failure to maintain proper records.
The sale of exotic pet animals	The needs of 'exotics' cannot be properly provided for in the artificial conditions of captivity and within the limited knowledge frameworks of their carers.
Pet fairs/markets	Should be banned.
Removing irresponsibility from pet trading	Greater regulatory control from local authorities is necessary. Including weekly inspections from a veterinarian or other appropriately qualified person. Traders are not qualified/accountable. Necropsy analysis of all animals. It is appropriate that traders are required to fund the cost of greater regulation through heavier licensing fees. There is also concern about the way that hobbyist groups are able to circumvent local authority bans on pet fairs.

Animal Welfare Federation of Northern Ireland

Animals in circuses	There should be a licensing and registration system for <u>existing</u> circuses. No animals additional to those already working should be added to the list.
Pet fairs	Should be licensed.
Animals for prizes, sold at car boot sales, sold at town centre markets	Should be banned.
Pet shops	Raise the minimum age at which a young person can buy a pet to 18. Consider banning the sale of animals at pet shops.
The welfare of captive pheasants	Ideally end sporting shooting. Where it does survive impose stringent controls.
Keeping exotic or dangerous animals as pets.	All and only, those animals that are already in the country should be registered, licensed, controlled and monitored. No further import or breeding programmes should be permitted.
Tail docking De-clawing Tendon cutting as performed on cats	Should be banned.
Should a new offence of likely to cause unnecessary suffering be introduced?	Yes.
Increasing the powers available to the police when investigating allegations Powers of arrest Increased sentences	The burden of proof should rest with the individual to show why they were present at an unlawful event. Sentences should reflect the concern of society, as well as offer a credible and serious deterrent effect.
Should the time allowed for proceedings to be brought before a court be increased?	Yes. To 2 years.
Power to make Codes of Recommendation	The Secretary of State should consult with a panel, including representatives of animal welfare organisations, before introducing codes.
Should animal sanctuaries be licensed	Yes. Care needs to be taken with regard to costs. Licensing authorities should assist sanctuaries to comply with statutory requirements.
Livery Yards	Should be licensed.
Should electronic prods be banned	All electronic shock devices should be banned.
The mis-use of bio-technology in animal breeding	Opposed to indiscriminate use of biotechnology or operation.
Welfare of racing greyhounds	<ul style="list-style-type: none"> • Industry to fund retirement of all greyhounds. • Monitor the welfare of all racing greyhounds. • Veterinarians to attend all races. • National standards and independent regulation of independent tracks. • The registered owner of a racing greyhound to be held responsible when there is an allegation of unnecessary suffering.
Humane destruction	The destruction of an animal in local authority care should only be undertaken by a veterinarian in line with Article 11 of Council of Europe Convention on Pets.

Animal Welfare Inspection Services

Should existing laws be updated and consolidated?	Yes.
Circuses	Winter quarters and trainers should be much more strictly monitored.
Pet fairs	Should be licensed.
Minimum age for buying pet animals	Should be 16.
Breeding of captive pheasants	Should be monitored more closely.
Trade in dangerous and exotic animals	Should be subject to stricter control.
Tail docking	Should be banned.
An offence of likely to cause unnecessary suffering	Should be introduced.
Powers of entry, search and seizure	Should be extended.
Maximum sentences	Should be increased.
Time allowed for proceedings to be brought	Should be increased to 2 years.
Codes of Recommendation	Should be introduced.
Animal sanctuaries	Should be licensed.

Animals Asia Foundation

Animals in circuses	Should be banned.
Pet shops	Should be phased out.
Keeping exotic or dangerous animals as pets	Should be banned. They are hard to care for and can cause a health risk.
Tail docking	Should be banned.
Should a new offence of 'likely to cause unnecessary suffering' be created?	Yes.
Increased sentences	Are essential.
Animal Sanctuaries	Should be licensed.
Livery Yards	Should be licensed.
Use of electronic prods	Should be banned.
The mis-use of bio-technology	It should be an offence to breed animals for the purpose of biotechnology.

Association of British Wild Animal Keepers

Animals kept by educational establishments	Appear to have overlooked in the consultation.
Should circus winter quarters be inspected?	Yes.
Should pet fairs be licensed?	There needs to be a rigorous definition of what constitutes a pet fair.
Pet shops	The present limit is adequate but purchasers should be given more guidance.
Keeping exotic or dangerous wild animals as pets	The review of the DWAA covers dangerous animals. Trading Standard Officers should be given the power to supervise the buying and selling of exotic animals.
Abandoned animals	Legislation needs to be in place.
Docking of tails	Must be deleted from breed standards and only done on veterinary advice.
Increasing the powers of entry, search and seizure	Expert involvement is necessary in these processes.
Should the time allowed for proceedings to be brought before a court be increased?	No.
Animal sanctuaries	Should be licensed.
Electronic prods	Use for herding or self-defence only.
Mis-use of biotechnology	There could be a problem in proving "intent". The breeding of hybrid falcons could be open to abuse.

Blue Cross

Dog Identification	Should be considered as part of an Animal Welfare Bill.
Licensing of animal sanctuaries	Yes. But care needs to be taken concerning the definitions within a Bill and the skills that are available to a licensing authority.
Animal behaviourists and dispensers of treatment programmes	Should be regulated through registration and/or certification.
Tail docking De-clawing Tendon cutting in cats	Should be banned.
Dangerous Dogs	The Dangerous Dogs Acts need to be amended.
Independent greyhound racing tracks	Need to be regulated.
Is there a need for an Animal Welfare Bill?	Yes.

Companion Animal Welfare Council (CAWC)

Definition of the offence of cruelty	Should be restricted to the second limb of s1 (1)(a) of the Protection of Animals Act 1911.
Should likely to cause unnecessary suffering be included in an Animal Welfare Act?	Where there is sufficient evidence to demonstrate beyond reasonable doubt that unnecessary suffering is likely to be caused.
The law and: • Fighting • Baiting • Operations causing unnecessary suffering	These acts should no longer constitute an offence of cruelty. Fighting and baiting should be positively banned. Operations on an animal should be carried out with due care and humanity.

What is the duty of the courts toward an animal?	Except when it relates to public safety the paramount considerations are: <ul style="list-style-type: none"> • The welfare of the animal; • a confiscation order should not be dependent on the owner/keeper of the animal being convicted of cruelty; • the assumption should be that when there is a conviction for cruelty the court will grant a confiscation and/or a disqualification order; • there should be the immediate and permanent seizure of an animal found in the custody of a person subject to a disqualification order; and • Disqualification orders should be extended to include keepers of animals and occupiers of premises on which the offence took place.
Should there be Codes of Recommendation?	Provide for secondary legislation including Codes of Recommendation.
Tail docking	The RCVS Guidance is not being adequately followed. Consideration should be given to increasing the accountability of veterinary surgeons.
Keeping of dangerous wild animals	Should be brought within the Act.
Animal shelters and rescue establishments	Should be licensed.
Businesses which make profit out of the breeding, sale, supply, or provision of other services involving companion animals	Should be regulated.
The responsibility of directors and senior managers of a body corporate	The principle that they are personally responsible for the treatment of animals used by commercial undertakings should be extended to the offence of cruelty.
Where a companion animal is owned by a child	The person who is legally responsible for the animal's care should be defined in the Act.
The giving of companion animals as prizes	Should be banned.
The law relating to the sale of companion animals	The law should: <ul style="list-style-type: none"> • State what is, and is not, lawful; and • Vendors or transferors of animals should take all reasonable steps to ensure that the person receiving the animal is aware of its needs and can meet them.
In the context of commercial activities, the responsibility of those who care for or treat animals	Should have sufficient knowledge and understanding of the needs of the relevant species, and are proficient in providing a high quality of care.
Can the law promote welfare?	Primary legislation can lay down express requirements relating to welfare. Secondary legislation can provide more detailed requirements and codes of practice.
Can a moral obligation be expressed in the Act?	Yes. The moral obligation is to take all reasonable steps to provide a high standard of welfare.
	Authorities should be provided with: i) sufficiently wide discretionary powers; ii) power to licence/or issue improvement notice; iii) inspect premises before a licence is granted.
Bio-technology and animals	Consideration should be given to extending the recently introduced regulations relating to the breeding of farmed animals.
Non domestic animals kept as companion animals	CAWC are considering this issue.
The way that a domestic animal should be killed.	Could be covered in the Act.
Power of seizure	Consideration should be given to amending the law.

Dorset Animal Welfare Group

Registration scheme	Needed for animals.
Low cost neutering service	Is necessary.
Right of entry	Should be available to senior welfare officers without police involvement.
Export of dogs	Should be strictly controlled.
Selling of animals	Through registered outlets only.

Fife Animal Welfare Network

Should animals in circuses be banned?	Yes.
Should the minimum age at which children can buy pets be raised?	Totally irresponsible to sell pets to children.
Pet Fairs	Should be banned.
The welfare of captive pheasants that are being bred for sport shooting	Sport shooting should be banned.
Keeping exotic or dangerous animals as pets	Ideally banned or at least discouraged.
Tail Docking	Should be banned. Include tail docking and other mutilations for farmed animals.
Should there be a new offence of likely to cause unnecessary suffering?	Yes.
Powers of entry, search and seizure	Should be increased.
Powers of arrest	Extend to all those present at organised fights.
Should sentences be increased?	Yes.
Should the time be increased for allowing proceedings to be brought before a court?	To 2 years.
Should there be Codes of Recommendation?	Yes.
Should animal sanctuaries be licensed?	Yes.
Should livery yards be licensed?	Yes.
The use of electronic prods for training	Should be banned.
Bio-technology	The production of GM animals should be banned.
Snare	Should be banned.
Air guns	There should be tighter controls.
Fireworks	There should be tighter controls.

Friends of Animals

Tail docking	Should be banned.
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International Fund for Animal Welfare

What needs to be in an Animal Welfare Bill?	Add to existing legislation by development strategies. Provide the extra enforcement powers that the RSPCA are calling for. Licensing to be the responsibility of a new regulatory body. Introduce an animal welfare ombudsman to oversee regulation and enforcement.
Standards and Welfare Codes	Use both primary legislation and secondary Standards. Welfare Codes could be developed for individual species or family groups. Such codes have been incorporated into the New Zealand Animal Welfare Act 1999.
Five Freedoms	Incorporate the Five Freedoms into the Act.
The minimum age at which a child can buy a pet.	Should be 16.
The minimum age at which a pet can be sold	Should be determined in the Standards and Codes.
People selling pets	All animal sellers should be subject to licensing control. Vendors should submit a comprehensive record of animals bought and sold.
Pet Fairs	Private and public fairs should be phased out.
Licensing and identification of captive animals	Farmed animals are within an identification scheme. This should be extended and bring in exotics, dogs and eventually other domestic animals.
Private ownership of exotic pets	Should ideally be banned but failing that subject to strict licensing control. Recent Belgian legislation provides guidance concerning which animals need to be subject to licensing controls.
Animals used in exhibitions, displays, shows and competitions involving animals	The welfare of animals taking part in these events need to be controlled by legislation.
Performing animals	All animals in entertainment, including circuses, should be phased out. In the meantime all performing animals should be provided with adequate legislative protection.
Methods of training and restraint (electronic aids)	Such products in future should be exposed to a safety and welfare review prior to being issued with a product licence.

Seizure and detention of stray animals	Recommended methods of seizure to be defined in the 'standards' or 'welfare codes.' Guidelines needed concerning ownership and of its transfer to the rescuing organisation. Neutering to be mandatory. Feral animals to be tagged neutered and returned to their place of origin.
Rescue and rehabilitation of wildlife	Those involved in the rescue, care and rehabilitation of wildlife should be licensed and expected to follow a best practice.
Establishments requiring licensing	All professional, commercial or charitable animal establishments to be licensed and to be given welfare codes.
Use of poisons and inspection of traps	All existing legislation to be consolidated into one Act. Legislation to be more focused towards the welfare of the animal. Traps to be avoided.
Prohibited operations	To include: Tail or ear docking of a dog; De-clawing of cats; Removal of teeth, claws, stings, spines, scent glands or any other defence Mechanism to facilitate management; Surgical procedures for cosmetic reasons; Surgical procedures which do not benefit the animal transplants.
Biotechnology in breeding	No animal should be subject to genetic manipulation. Breeding genetically defective animals should be limited to those that are being used in scientific experimentation. Known and identified genetic defects should be gradually eradicated. Increased regulation of breeding of domestic animals.
Rearing of captive game birds	Should be subject to specifically developed 'standards' and 'welfare codes.'
Rescue and rehabilitation of oiled wildlife	Need to consider the international alliance protocols as the 'Standard.'

League Against Cruel Sports

Court powers and sentencing	All legislation relating to animal cruelty should be brought in line with the Protection of Animals Act 1911. In the case of suffering or likely to cause suffering, courts should have the power to confiscate animals from the person charged with the offence. Where animals have been confiscated pending trial there should be a maximum of 100 days between a person being charged and the case being brought to court.
Should an offence of likely to cause unnecessary suffering be introduced?	Yes.
Snares	All snares should be banned.
Pigeon Racing	The numbers of pigeons per basket should be reduced.
Grouse shooting	Tougher protective legislation is needed.
Pheasant shooting	Ideally the breeding of birds for sporting shooting be banned. Failing that make captive birds subject to the same controls as farmed poultry. The minimum age that a person may use a shotgun to kill an animal should be 18.
Animal Sanctuaries	Simply providing food and shelter may not constitute a sanctuary.
Circuses	Should be banned.
Pet fairs	Should be licensed.
Pet shops	The minimum age for buying pets should be raised to 16.
Keeping exotic or dangerous animals	Should be banned. The only exception should be under licence where the animal is being kept for the betterment of mankind.
Tail docking	Should be banned.
Livery Yards	There should be a general duty of care for animals.
Electronic prods	Should be banned. Except for electric fences where animals are freely able to avoid them.
Biotechnology	It should be an offence where the breeder has the deliberate intent to cause unnecessary suffering.
Horse Racing	Over hurdles should be banned.
Guidelines and Recommendations	Should be subject to criminal sanctions.
The basis of the law	If something cannot be shown to be humane it should be regarded as illegal.

National Animal Welfare Trust

What should an Animal Welfare Act	Promotion of high standards of care, hygiene and quality of life of companion animals. Promotion of the competency of enforcement staff, greater co-operation between DEFRA and councils over inspection. Make adequate provision for its enforcement. Increase police powers of investigation with the co-operation of the RSPCA.
Sentencing	A 'Life' ban should mean 'Life' and should encompass all persons within the household in which the offender resides.
Licensing	The following should be licensed: Pet shops; Breeding kennels/catteries; Boarding kennels/catteries; Animal sanctuaries; Stray dog pounds; Greyhound kennels; Livery yard; Riding Stables; Circus animals' winter quarters.
Pet shops	16 should be the minimum age for buying a pet. Sale of dogs and cats should be prohibited. Ensure potential new owners have appropriate knowledge and facilities; Records should be kept of all animals; Greater control over the selling of exotic or dangerous animals as pets; Local authority power of closure.
Pet Markets & Fairs	More regulation needed.
Breeding dogs and cats	All owners of a breeding bitch should hold a licence. All cat breeders should be licensed.
Greyhounds	Both licensed and unlicensed tracks need a code of practice. Self-regulation inadequate.
Cruelty	Up-date the definitions contained in the 1911 Act.
Mutilation	Ban. The docking of dogs tails and removal dew claws for purely cosmetic reasons. The de-clawing and tendon cutting of cats.
Tethering	The Act should cover all domestic animals. Include situations where suffering is likely to occur.
Electronic aids	Ban electronic prods and collars.
Farm animals	Journeys to slaughter should be no more than 50 miles.
Registration and Identification	Should cover all dogs.
Dangerous Dogs	The welfare of dogs being held under the DDA should be addressed.
Animal behaviourists/trainers	Should be licensed.

Naturewatch

Questions that need to be asked include: Will consolidating 10 Acts make legislation harder to enforce? Should the Act cover wild animals? How will the authorities be resourced to enforce the Act? Will additional licensing requirements have a de-motivating effect on the animal world? Will there be a more scientific definition of some of the words used in the 1911 Act to describe cruel acts? When do privately owned animals become commercial? What about the over-lap with the Dangerous Dogs Acts? Where would the extra money for increased licensing surveillance come from? What is unnecessary suffering? Define necessary?	
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North Kent Animal Welfare

Should the law permit circus animal acts?	No.
Horses	Registration and identification scheme run by local authorities. Regular monitoring by welfare organisations. The prohibition of the keeping of tethered horses on common land. Owners to provide a signed certificate accepting responsibility for the upkeep and the welfare of the animal. Lifetime bans on equine owners who fail to take their responsibility seriously.

Sale of pets	18 should be the minimum age for buying a pet. 6 local authority visits per year to pet shops. Comprehensive record keeping of all animals that pass through the hands of pet shop owners. DIY stores should not be permitted to sell animals.
Tail docking	The existing legislation is not being properly enforced.
Freedom of information on animal experiments	Freedom of information legislation should apply to experimentation on animals.
Should there be Codes of Recommendation	Yes.
Other issues	There is a need for a Minister of Animal Welfare. Ban the export of live animals. There is a need for tougher sentencing - including a greater use of life bans.

People's Dispensary for Sick Animals (PDSA)

New legislation?	Yes.
Companion Animal Owner/Keeper Responsibilities	Legislation should balance the individual's right/privilege to own or keep a companion animal with his/her responsibility for ensuring its welfare.
Breeding establishments	Should be licensed.
Boarding establishments	Owners/managers should be licensed.
Animal Sanctuaries	Should be licensed. Include police forces and local authorities in the definition.
Pet shops	Sales should be restricted to adults. The sale of exotics should be further restricted. The knowledge and facilities available to purchasers should be scrutinised.
Mutilations including tail docking and onychectomy	Should be banned except for therapeutic reasons.

Pet Advisory Committee

DEFRA initiative.	Agree.
Minimum age at which to buy companion animals.	16 years of age. Nominated adult where child is recipient of animal. If parents cannot take this responsibility then they should not assume that their offspring would do so by themselves. Keeping of animals on school premises requires review (arrangements during school holidays, etc are random, variable and often irresponsible). Welfare of animal in an environment of excessive attention needs consideration (Japanese take dogs around factories to relieve tensions of workers, but what tension results to the animal has not been researched).
Ownership of non-domesticated species	50% increase in ownership of such animals in recent years. Much ignorance about ownership of these animals. Increase in belief that people should keep animals without any interference because this is seen as a "human right". Keeping of animals should be based appropriateness of a species for domestic containment, effect on neighbours/environment in event of escape or set free. Little legislation to control industries that breed animals for slaughter to feed the increase in reptiles, e.g. rodents for snakes.
Pet Fairs	Should be banned. These are a ready outlet for nefarious practices and possibly illegally obtained stock. The ephemeral nature of this trade lends itself to bad practice with little opportunity to track down wrongdoers. The practice of pretending these trade fairs are "hobby breeders" or private clubs carrying out normal exchanges of surplus breeding stock should be treated with scant regard.
Codes of Recommendation	Would help local authorities. More equality of enforcement. Website could be set up for examples of best practice. Centralisation of results of court cases would provide more effective enforcement when keepers have been banned.
Enforcement	Enforcement should be addressed in any new Animal Welfare Bill. The newly introduced wildlife police may be a basis for the way forward. Greater need to share information. Shared resources needed to cover large areas (e.g. illegal selling of live animals). Illegal imports allow "home-bred" animals to grow in number. No factual evidence to show that if licence fees were reduced it would remove disincentive for keepers to obtain licence.
Training	Training courses should be developed. Could be used as "penalties" for offenders - fines do not improve welfare standards although they could pay for the training. Training should be approved by Nationally accepted training organisations. Argument for requiring persons intent on keeping certain species to be trained in the skills of pet management before taking delivery of the animal.

Biotechnology	The Agriculture and Environment Biotechnology Commission will report on this matter. Reproduction of companion animals by cloning is not good practice and should to be avoided. Removal of genetic deficiencies within breeds is worthwhile but will require greater control of breeding than at present. Tighter controls will reduce need for random breeding for short-term profit. Greater clarity of what is or what is not a pedigree animal will result. Widespread use of DNA testing will probably depend on amore portable sampling and testing system being marketed.
Circus Winter Quarters	Should be licensed. Recommendation of the Circus Working Party should be taken into account. Survey figures produced for the Government do not relate to those produced by the Chartered Institute of Environmental Health regarding numbers of circuses and the councils they visit. A circus licensing system should be introduced.
Conclusion	We propose more in depth comments once a draft Bill has been made available.

Protect Our Wild Animals

Snares	All snares, particularly 'self locking', should be banned. BASC codes of practice should become statutory.
Rearing of game birds	The rearing of any animal or bird for hunting or killing for sport should be banned.
Terrier work	It should be an offence to wilfully cause or permit any dog to enter the subterranean burrow, sett, earth or similar refuge of any wild animal.
Penalties	There should always be an automatic presumption of confiscation and disqualification.

Respect for Animals

Academics and drafting an Animal Welfare Bill	Involve academics such as Prof. Broom of Cambridge in drafting legislation
Mental suffering	Should be included in an Animal Welfare Act.
Enforcement	There should be a new independent government enforcement agency or the police should be given a new mandate and increased resources.
Sentences	Maximum sentences should be increased and a greater use made of life long bans. Loopholes need to be plugged.
The time allowed for bringing proceedings before a court	Should be increased.
Should there be a new offence of likely to cause unnecessary suffering?	Yes.
Animals in circuses	Should be banned.
Cruelty in foreign countries	The import of overseas goods that have involved an animal being made to suffer should be addressed in the Act.

Rhondda Animal Aid

Pet Shops	The minimum age for children to purchase pets should be 16. Pet shops should be required to maintain a record of purchasers' names and addresses.
Should animal sanctuaries be licensed?	Yes.
Tail docking	Docking for cosmetic reasons should be banned. All docking - including farmed animals - to be undertaken by veterinary surgeons.
Transportation of domestic animals	Needs to be regulated.

Royal Society for the Prevention of Cruelty to Animals (RSPCA)

What animals should come within the scope of an Animal Welfare Act?	Domestic and captive animals.
A duty of care to animals	A new additional offence should be created of breaching a duty of care. It should be based on the Five Freedoms.
Cruelty	A specific offence should remain but without a restrictive list of particular activities.

Abandonment	The Abandonment of Animals Act 1960 should be incorporated into the Act but with an amendment that takes account of circumstances that are likely to cause suffering, as well as unnecessary suffering.
Operations performed without humanity	Should be consolidated into the Act.
Fighting and baiting	Should be subject to a maximum of 2 years imprisonment.
The possession of appliances offences created by the Cockfighting Act 1952	Should be consolidated into the new Act.
Traps	The provisions of the 1911 Act should be incorporated into the Act. Issues that need to be considered are: <ul style="list-style-type: none"> • Cage traps; • Spring traps; • The frequency with which traps have to be inspected; • The release of non-targeted animals; and • The need to seek appropriate veterinary assistance.
Pests and poisons legislation	Should remain - the RSPCA remains opposed to the use of strychnine.
Tethering	A new offence of likely to inflict unnecessary suffering will help. Codes of Recommendation will also help.
Tail Docking and dew claws	<p>Dogs</p> <ul style="list-style-type: none"> • Tails - ban apart from therapeutic reasons; • Dew claws - ban apart from therapeutic and possibly prophylactic reasons. <p>Lambs</p> <ul style="list-style-type: none"> • Tails - ban apart from those at risk from fly-strike; • Castration - should be carried out by competency- tested individuals; • Should not be carried out until the lamb is at least 24 hour old. <p>Pigs</p> <ul style="list-style-type: none"> • Tails - should only be carried out by a veterinary surgeon for therapeutic reasons or to prevent tail bite; • Castration - the castration of piglets should be banned. <p>Cattle</p> <ul style="list-style-type: none"> • Castration - should only be carried out by competency tested individuals.
Beak trimming	Should be restricted to chicks between 5-10 days old. Only the tip of the upper mandible should be removed. Beak-trimmers must be competency tested.
Animals as prizes	Should be banned.
Welfare of captive game birds	Should be subject to Codes of Recommendation
Electric goads and shock collars	Should be banned.
Circuses	Should be banned.
Exotics	The keeping of vulnerable species of exotics should be prohibited.
Pate de foie gras	Production should be banned.
Powers of arrest	Should be extended to all fighting and baiting offences by increasing the sentence.
Entry, search and seizure	Powers of entry should be available when an animal related offence is suspected. Veterinary surgeons should also be able to obtain the telephone authority of the police to treat or euthanise animals.
Expenses relating to seized animals	Should be recoverable before and after court proceedings.
Where a person is unfit to stand trial under the Criminal Procedure (Insanity) Act 1964 s4	The court should be able to make disqualification and deprivation orders.
Disqualification Orders	Should be made more effective so that they cannot be so easily flouted.
Deprivation Orders	<p>The existing power to make confiscation orders should be taken forward as a power to make deprivation orders. A cruelty conviction alone should be sufficient to trigger a deprivation order.</p> <p>A deprivation order may also be made in respect of a body corporate or unincorporated association.</p>
Penalties	The maximum penalty for fighting and baiting offences should be increased to 2 years imprisonment. The penalty for a new duty of care offence should be a maximum of 3 years' imprisonment or a level 3 fine.

The time allowed for bringing proceedings	Should be 6 months, starting with the day on which evidence sufficient in the opinion of the prosecutor to warrant the proceedings came to his knowledge, providing that no proceedings are brought more than 2 years after the commission of the offence.
Who should regulate?	National standards delivered at a regional level. A new national animal welfare service should be established. Where local authority regulation remains, whether on an interim or long term basis, greater efforts should be made to ensure consistency of approach between authorities.
What should be regulated?	Animal Sanctuaries Livery Yards All premises where farm animals are kept as a business Boarding establishments for any species of animals Breeding establishments for dogs cats small mammals, birds and exotic animals. Riding establishments One Day Pet Fairs (preferably banned) Inter-net sales Sales in the thoroughfare of shopping centres Sales in public places should be prohibited Sales to children under 16 should be prohibited A clear definition of business is needed Training courses should be established for all those in regulated animal activity There is a need to consider whether functions and premises relating to local authority/DEFRA officials should be licensed.
The mis-use of bio-technology in animal breeding	The Animals (Scientific Procedures) Act 1986 should continue to apply. The use of DNA technologies should be tightly regulated.
Powers with respect to stray animals	Organisations and individuals who take-in stray animals should operate within a statutory framework concerning re-homing, selling or destroying.
Dog Registration	There should be a national provision relating to the identification and registration of dogs.

Scottish Society for the Prevention of Cruelty to Animals

Animals in circuses and travelling menageries	Should be banned. Failing that they should be subject to the same licensing system as animals in zoos.
Pet shops	The minimum age at which a child can buy a pet should be raised to 16 The vendor should have a knowledge of the animal that is being sold Dangerous wild animals should not be sold.
The welfare of captive pheasants bred for sport shooting	This is adequately covered by the Protection of Animals (Scotland) Act 1912.
Keeping exotic or dangerous animals as pets	Public safety issues connected with dangerous wild animals are covered by the Dangerous Wild Animals Act 1976. There is scope for including exotic animals within this Act. The lack of knowledge of sellers and purchasers also needs to be addressed.
Tail Docking	Except for therapeutic reasons should be banned. The competency of those docking agricultural animals also needs to be addressed.
New offence of likely to cause suffering	Is needed. Nevertheless in WATO and the Abandonment of Animals Act 1960 it is used in specific circumstances. Risk of vexatious litigation. A solution may be to use the phraseology of the Agriculture (Miscellaneous Provisions) Act 1968 where the reference is to unnecessary pain or distress.
Increasing the powers available to the police when investigating allegations	Under the Protection of Animals (Scotland) Act 1912 a constable may apprehend without warrant any person whom he has reason to believe to be guilty of an offence under the Act. SSPCA Inspectors may apply to the Procurator Fiscal for a warrant to search premises and seize evidence.
Powers of arrest	Under the Protection of Animals (Scotland) Act 1912 anyone present when animals are placed together for the purpose of fighting can be arrested.
Increased sentences	Scottish courts should be stronger and more consistent in the application of sentences. There is a need for a higher minimum fine and an automatic minimum ban (dependent on mitigation) would be preferable to increasing the maximum sentence available to the courts. Need to ensure that the offender does not simply hand over ownership to

	another member of the family.
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Increasing the time allowed for proceedings to be brought before a court	Should be increased to 1 year.
Animal sanctuaries	Should be licensed.
Livery yards	Should be licensed.
Use of electronic prods	Set a voltage limit rather than ban. The use of electronic dog collars should either be banned or used under Home Office licence.
Mis-use of bio-technology in breeding	The welfare aspects need to be researched.
Breeding and Sale of Dogs Act	This Act is almost unenforceable.
Codes of Recommendation	Valuable; enforceable codes of value
Inconsistency in local authority licensing standards	Needs to be addressed.

Watford Animal Group

Questions that need to be asked?	Need to consider including the following issues in any up-dating legislation: Intensive farming; Horse racing; Animals in transit; Zoos; Scientific experimentation; A subsidised spaying and castration service; A better quarantine service; Closure of puppy farms.
Animals in circuses	Should be banned.
Pet fairs	Prefer banning but greater regulation is essential.
Pet shops	18 should be the minimum age for buying pets.
Pheasants being bred for sport shooting	Dispute the compatibility of sport shooting and likely to cause unnecessary suffering.
Keeping exotic or dangerous animals as pets.	Ideally these animals should not be available for sale. Stricter controls needed.
Tail docking	Should be banned.
The creation of a new offence of likely to cause unnecessary suffering	This phrase needs to be given greater clarity.
Should the powers available to the police when investigating allegations be increased?	Yes.
Powers of arrest	Should be extended to all people present at an animal fight.
Should sentences be increased?	Yes.
Should the time allowed for proceedings to be brought before a court be increased?	Yes.
Should Codes of Recommendation be introduced?	This could result in a lowering of standards.
Animal sanctuaries	Should be licensed.
Livery Yards	Should be licensed.
Use of electronic prods	Should be banned.
The mis-use of bio-technology	There should be a ban on the breeding of all genetically defective animals.

West Sussex Wildlife Protection

The Animal Welfare Act should provide detailed controls over trapping and snaring.
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THE CAPTIVE BIRD INTEREST

Some common themes

- The selling of birds at one or two day pet fairs is strongly supported by aviary groups but welfare groups consider that these events cause stress for birds or any other animals that are being sold.
- There is general agreement that the legislation regulating the buying and selling of pet animals needs to be up-dated.

Some quotes from the responses

- Properly run pet fairs pose no threat to animal welfare as both organisers and audience have the animals' interests at heart. As such pet fairs should be encouraged. They are an important means of exchanging stock, obtaining fresh bloodlines, disposing of surplus stock, and sourcing hard-to-find feeds, seeds, equipment and animal health products.
Cage & Aviary Birds
- There is, among some within the bird-keeping world a sentimental attachment to public bird sales. Older bird keepers will have grown up with regular visits to such events. These people often claim such events are important in providing a venue for the dissemination of bird keeping knowledge amongst devotees and as such should not be regulated. They liken these bird events to the shows proper, of dogs and cats. However, the bird sales are simply sales, not shows. Dogs and cats are not traded at itinerant events.
BirdsFirst
- New forms of heating, lighting and housing, and commercially farmed live foods are enabling hobbyists to keep exotic pets successfully and also establish captive-bred populations of species that are becoming endangered in the wild. Such products are widely advertised, available by post, and supported by telephone advice lines, thereby ensuring the more exotic pets are well fed and housed.
Cage & Aviary Birds

CAPTIVE BIRD INTEREST

Birding World

Trade in wild caught birds	Should be banned.
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BirdsFirst

Pet Animal Acts 1951-83	Intention was to improve welfare unfortunately did not. Many birds die within a few days of purchase. No guarantees or receipts given. Successful as far as licensed pet shops is concerned (although improvements could be made).
Problems	Welfare measures cannot be maintained with itinerant bird sales at public places. PAA being inadequately enforced or at best inconsistently some itinerant sales are stopped, as license not granted. Some local authorities give licenses to all sorts of venues. Lack of guidance from central Government.
Should itinerant bird sales be banned	Yes. Either enforce the spirit of the law properly or new legislation to ban it altogether. If former, need proper guidelines.
Minimum Age	2 categories. 'A' (16) budgerigars, finches, buntings, cockatiels. 'B' (18), all other birds.
Licensing of individuals	Holders of 'B' birds should be licensed.
Mutilations	End to wing clipping of immature (less than 2 years old) bird's wings. Only carried out by veterinary surgeon/nurse experienced in avian medicine. Must be done symmetrically with more than half flight feather left intact.
Cage size	Not less than the wingspan of the largest bird in cage.
Commercial importation into UK/EU of wild birds for pet/aviculture trade	Ban. Few exemptions, which should be licensed.
Sale of birds	Should be fledgling age or older and able to fully feed themselves.
Licensing of animal sanctuaries	Yes.
Likely to cause...	Yes.
Proceedings	Increase to 2 years.

Birdymad

Ban on keeping birds	No.
Minimum Age	Minimum age of 18 for all livestock.

Cage and Aviary Birds

Publicity	Consultation should be advertised in avian and pet press with deadline extended.
Pet Keeping	Reject notion that this is bad. Believe way forward is to encourage people to keep pet, ideal way to introduce children to responsibility.
Further restrict minimum age?	No.
Remove unnecessary obstacles	In the way of importing, transporting, keeping, breeding, showing or disposing of pets.
Measures to curb animal rights extremists' tactics	Varying kinds such as against carriers, disruption of breeding lines etc.
Likely to cause...	No.
Encourage/Oblige airlines to carry animals	Less stressful than at sea.
Pet fairs	Clarify law as loosely drafted. Confusion between properly run pet fairs and 'street barrows'.
Industry codes of practice	Official encouragement please.
Exotic animals	Keeping these as pets should be encouraged. Care and adequate housing etc. is not a problem as there are plenty of products around.
Definition of a dangerous animal	Great care needs to be taken. Exotic is often confused with dangerous.
Medicines and treatments	Should be available at reasonable cost over the counter.
Simplification of VAT position	For pet retailers and wholesalers, sanctuaries and zoos. Too much variation at present.
Pet health insurance	Exemption from insurance tax.
Licensing	Animal sanctuaries should remain exempt. Often very small and cannot afford fees. Closure would not help the welfare of animals that have gone there.

Zoo licensing	Should continue. Those carrying out inspection should be given guidelines on what is important.
Importation of animals caught in the wild on a sustainable basis	As easy as possible.
Powers of entry	Adequate.
1911 Act sentences	Adequate.
Time limit	Left at 6 months.
Captive game birds.	Should take account of pest control, predation etc. Lead in cartridges should still be permitted.
Breeding techniques	No distinction between traditional and new technologies.
Encourage owners	To neuter pets, fit collars with collars and bells, provide appropriate litter trays.
Tail docking	Yes. Working dogs in thick brambles and scrub.

New Life Parrot Rescue

General	Endorse comments by Greg Glendell of BirdFirst (see above)
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Pet Parrot Appreciation Club Wales (UK)

Asked a number of questions!	
Animal sanctuaries	Concerned over animals kept at small well-run sanctuaries. Worried that this would go too far. What would the definition of a sanctuary be?
Licensing	Concern that some owners would rather kill the animal rather than pay for a license. Indeed what should be the priority, feed the animal or buy a license. This could finish off small welfare groups, the cost of a license could prove prohibitive.
Concern about the Bill	Dominated by large organisations and individual activists. She opposes the proposed Bill, as it will not only cover the dishonest element, but also the genuine. Proper education appears to be the answer sponsored by the Government.

THE CAT & OTHER DOMESTIC MAMMAL INTEREST

Some common themes

- Yes to a new offence of 'Likely to cause unnecessary suffering.'
- Yes to the continuation of pet fairs.
- Yes to the licensing of animal sanctuaries.
- Yes to raising the minimum age at which a child can buy a pet.

Some quotes from the responses

- Care needed with regard to legislation on the mis-use of bio-technology in animal breeding. Who decides what is genetically defective; for instance, is a curly coat in a cat or deafness associated with some white cats to be considered as genetically defective.
The Governing Council of the Cat Fancy
- There should be a minimum age for the purchase of any pet. All pet shops should be required to provide a leaflet explaining the animals needs and the responsibilities of the owner for every animal sold.
British Goat Society
- There should be a category of animal for which competence to care for them must be proved before such species can be purchased/kept.
British Goat Society
- Electronic prods should be banned except in cases where a vet has deemed that their use may save life when dealing with a dangerous animal.
British Goat Society
- We believe that anyone taking on a pet rabbit should do so with an obligation to cater for that animals physical and behavioural needs, including the provision of a suitable diet; spacious accommodation with adequate opportunity for exercise and protection from predation; company (preferably of another rabbit) for this most social of species; and access to appropriate veterinary care. We would therefore support any move to encompass such requirements in some kind of legislative process.
Rabbit Welfare Association

THE CAT & OTHER DOMESTIC MAMMAL INTEREST (excluding dogs)

British Goat Society

Circuses	Winter quarters should be licensed. Animal acts should be banned if they are found to be cruel.
Pet fairs	Should be regulated to avoid cruel practices.
Pet shops	There should be a minimum age for purchasers. Pet shops should be required to give purchasers a leaflet that sets out the animal's need and the purchaser's responsibilities.
Captive pheasants for shooting	Breeding establishments should be inspected.
Exotic and dangerous animals	Potential purchasers must demonstrate a competence to care.
Tail docking	Only when it is necessary because of the risk to the animal's health.
Should there be an offence of 'likely to cause unnecessary suffering'?	Yes.
Should there be increased powers given to the police and to the courts?	Yes.
Should the Secretary of State be empowered to make Codes of Recommendation?	Yes.
Should animal sanctuaries and livery yards be licensed?	Yes.
Electronic prods	Should be banned except when a vet has decided that it may save life when dealing with a dangerous animal.
Use of bio-technology	Some techniques are hard to justify when profit is the only motive.

Cat Association of Britain (CAB)

Pet Fairs	There is concern that cat shows would be regarded as pet fairs. CAB considers that its events are already well managed.
Should the minimum age at which children can buy pets be raised?	Yes.
The creation of a new offence of 'likely to cause unnecessary suffering'?	CAB would like to be involved in this initiative.
Should the powers available to the police be increased when investigating allegations?	No. CAB breeders disagree. There are already stringent FIFE guidelines in place and recourse to the police could lead to vindictive rivalry between some breeders.
Should sentences be increased?	Courts should have the power of greater flexibility when passing sentence.
Should there be an increase in the time allowed for proceedings to be brought before a court?	The sooner the case is brought the better.
Should the Secretary of State be empowered to make Codes of Recommendation?	CAB would like to be involved in any further consultation concerning Codes. Do not consider this relevant.
Should animal sanctuaries be licensed?	Yes.
The mis-use of bio-technology	How do you define genetically defective in respect of felines?

Donkey Breed Society

Should there be a new offence of 'likely to cause unnecessary suffering'?	Yes.
Should animal sanctuaries be licensed?	Yes. Inspectors should have knowledge specific to the species.
Tethering	Should be banned completely.

Feline Welfare

Regulation of pedigree breeding	Responsibility of official British registering organisations.
Should over-breeding be avoided?	Yes.
New breeds on particular mutations	Not acceptable unless welfare is not compromised.

Governing Council of the Cat Fancy

Should animals in circuses be banned?	Yes.
Pet fairs	What does DEFRA mean by a pet fair?
Pet Shops	Raise the minimum age at which a child can buy a pet.
Keeping of exotic or dangerous animals as pets	Tighter controls on buying and selling are needed.
Tail docking	N/A to cats.
Increasing the powers available to the police when investigating allegations	In some contexts yes but there should be no increased power of entry to domestic premises.
Increasing powers of arrest	Yes to cover all involvement in animal fighting.
Should sentences be increased?	Yes.
Should the Secretary of State be empowered to make codes of Recommendation	Not agreed.
Should animal sanctuaries be licensed?	Clear definition of a sanctuary is needed.
Should livery yards be licensed?	In principle yes but a clear definition of a livery yard is needed.
Use of electronic prods	N/A for cats.
The mis-use of bio-technology in animal breeding	Care needed, e.g., is deafness in some white cats to be regarded as genetically defective.

National Angora Club

Should there be an offence of likely to cause suffering?	It could be open to wide interpretation. It should not be used to prevent animals being caged or penned.
Pet fairs	Pet fairs involving Angora Rabbits are already well managed and placing unnecessary or unsuitable regulations on these events could be detrimental to the welfare of these animals.

National Mouse Club

Should the law be changed?	No.
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Rabbit Welfare Association

Should there be an offence of likely to cause suffering?	Yes. Anyone taking on a pet rabbit should do so with an obligation to cater for the animal's physical and behavioural needs? To include companion rabbits and access to veterinarian care.
Should the minimum age at which a child can purchase an animal be raised?	Yes, to 16.

CENTRAL GOVERNMENT INTEREST

Some common themes

- **The consolidation and modernisation of welfare legislation is to be welcomed.**
- **An offence of 'likely to cause unnecessary suffering' is to be welcomed. However, care will need to be taken with the way that it is defined in the Bill.**
- **Tail docking should be banned but there may need to be an exemption for sheep.**

Some quotes from the responses

- **Consolidation of the legislation is welcomed. However there is no mention of the Agriculture (Miscellaneous Provisions) Act 1968. Many prosecutions are taken for welfare offences under this legislation. Is this Act to be subsumed into the new legislation?**
Veterinary Officers at Stafford Division
- **The policy of the Government is to encourage farm diversification, and if farmers are now farming new sorts of animals for their meat or wool, then they will eventually want to show them at agricultural shows etc so as to get a better price for them. We ought to ensure that the legislation does not unreasonably get in their way.**
Sophia Lambert - Wildlife, Countryside and Flood Management
- **Clarification is required on what can be seized and used as evidence in prosecution cases. Powers of entry should be restricted to specialist DEFRA staff, police and other specified enforcement officers of the local authority, e.g., Trading Standards Officers.**
Veterinary Officers at Stafford Division
- **Use/mis-use of biotechnology in breeding. Mr Harris gave an example of an anomaly where a Home Office licence is required for a laboratory research whereas a farmer can put an inappropriately large bull onto a small heifer for breeding (no legislation).**
SVS Surrey, Kent, East and West Sussex Animal Welfare Liaison Group
- **Better co-ordination in the collection and use of shared data would deliver benefits to both enforcement authorities and the industry. This is one of the central objectives of the whole farm approach.**

Charles McCall FFD

CENTRAL GOVERNMENT INTEREST

DEFRA - Farm Focus

Privacy and data-sharing	Significant issue when it comes to using information gathered for specific purposes for different tasks/objectives. Better co-ordination in the collection and use of shared data would deliver benefits to both enforcement authorities and the industry. This is one of the central objectives of the whole farm approach.
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DEFRA - State Veterinary Service - Stafford Division

DEFRA initiative.	Agree (but suggest that the Animals (Miscellaneous Provisions) Act 1968 also be included in review).
Circuses	New legislation should take account of circus winter (and temporary) quarters while travelling.
Pet Fairs	Should be subject to greater regulatory control.
Pet Shops	Should be a minimum age but difficult to implement.
Captive Pheasants	Doubt whether pheasants can be regarded as captive - should be a specific provision for them.
Exotic or dangerous animals	Greater control over buying and selling - there are significant public health issues involved.
Tail Docking	Should be banned (possible exception of sheep) except where welfare problem in individual animal RCVS should give firmer guidance.
Powers of Seizure	Clarification required on what can or cannot be seized and used as evidence in prosecution cases.
Powers of Entry	Only available to DEFRA staff, police, and other specified enforcement officers of local authorities.
Powers of Arrest	Extended to include anyone present, particularly in relation to dog fights.
Increase in time allowed for proceedings to be brought before a Court	Increase in time allowed.
Codes of Recommendation	The S of S should be empowered to make welfare codes to cover all circumstances involving the welfare of all species, except man.
Should animal sanctuaries be licensed?	Yes.
Should livery yards be licensed?	Yes, although not a crucial issue as horses are owned, used and controlled by individuals - so are self-regulating.
Should electronic prods be banned?	Yes.
Misuse of biotechnology in breeding	Out-with scientific or medical research it should be an offence for anyone to knowingly produce an animal which is genetically defective if this causes suffering to the animal.

DEFRA - State Veterinary Service - Surrey, Kent, East and West Sussex Welfare Liaison Group

DEFRA initiative.	Agree (but not enough use was made of existing legislation and new legislation could cause more problems).
Animals in circuses	Legislation needs updating.
Pet Fairs	Legislation needs updating.
Minimum age at which to buy companion animals	16 years of age.
Pheasant rearing	Anomalies between farmed and sporting animals.
Exotic pets	Greater controls on buying and selling.
Tail docking	Any changes are dependent upon which species. Any legislation requires extreme care in drafting.
Likely to cause unnecessary suffering	Great care needed over drafting.
People present at illegal acts (cockfighting)	New legislation needed.
Increased penalties	Prefer community service and education courses to custodial sentences (but community service should not replace paid workers). Should be a good reason for banning ownership of animals.

Increase in time allowed for proceedings to be brought before a Court	Remain the same.
Codes of Recommendation	Favourable but problem if subject matter is too general (e.g. keeping of exotic animals). Should be specific (e.g. horse tethering).
Should animal sanctuaries be licensed?	Yes.
Should livery yards be licensed?	No.
Use of electronic prods & collars	Undesirable and probably unnecessary.
Misuse of biotechnology in breeding	Subject should be explored further.

DEFRA - State Veterinary Service - Veterinary Surveillance Team

Animals kept for companionship	Is there a difference between "companionship" and "enjoyment"?
All suggestions	Seem laudable but there are issues of enforcement and resource implications.
Likely to cause unnecessary suffering	Careful drafting of offence to distinguish between acceptable and unacceptable behaviour.

DEFRA - State Veterinary Service - Cornwall Welfare Liaison Group

DEFRA initiative.	Agree.
Should there be a new offence of "likely to cause unnecessary suffering"?	Yes.
Increase in maximum penalties?	Yes.
Increase in time allowed for proceedings to be brought before a Court?	Yes - 2 years.
Codes of Recommendation?	Yes - in particular for tethering; care of horses and ponies; exotic animals; and for common grazing of horses and ponies.
Should tail docking be banned?	Yes (but could be a problem for sheep industry).
Should animal sanctuaries be licensed?	No, unless there is an intention of profit.
Should livery yards be licensed?	Yes.
Should electronic prods be banned?	Yes.
Deliberately breeding from animals that are genetically defective.	Should be prevented.
Powers of entry.	Greater powers for DEFRA veterinary inspectors, local authority officers and police to enter premises to check welfare of animals.
Ban on convicted persons keeping animals.	Problem of convicted persons finding loopholes, no powers to do anything.
Cattle passports	Should be made available by BCMS to people going about their legal business.
Identification of animals whilst common grazing.	Problem - identification removed from dead animals to prevent owner being traced for disposal purposes. Animals should be humanely marked with registration for both disease control and welfare inspections.

DEFRA - State Veterinary Service - Gloucester Division

Should tail docking be banned?	Concerned that it might serve to perpetuate the fiction marketed by dog breeding fraternity that tail docking was not (in effect and by government intention) banned by the last amendment to the Veterinary Surgeons Act. Should question read "Should existing bans on tail docking be enforced and extended to all species?"
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DEFRA - Veterinary Fisheries Aquatic Surveillance

Misuse of biotechnology in breeding	There are a number of Government committees and advisory bodies giving thought to this area. It will be a matter of whether the issue will require its own SI. The subject is generally broader than welfare in as much that it includes other aspects of ethics. If included in Animal Welfare Bill it will need to cover the introduction of "genetically defective" animals into country as well as breeding locally.
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DEFRA - Wildlife, Countryside and Flood Management Directorate

Llamas (clarification of farm and exotic animals)	More exotic animals are being "farmed" (e.g. llamas, ostriches and water buffalo) so can no longer be considered as zoo animals. The Government encourages farm diversification so certain animals should be removed from the non-domesticated list.
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HOME OFFICE - Police Leadership and Powers Unit

Wish to be kept informed of developments.

LORD CHANCELLOR'S DEPARTMENT - Civil Justice Division (Civil Issues Branch)

Increase in time allowed for proceedings to be brought before a Court	Cost implications for courts. Will need to consider consequences of the suggestion. May also need to consider any changes to appeals and other court procedures in light of the suggestions.
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SCOTTISH EXECUTIVE - Justice Department (Criminal Procedure Division)

Wish to be kept informed of developments, as no doubt some suggestions will have an impact on animal welfare in Scotland.

THE CIRCUS INTEREST

Some common themes

- Views are polarised - welfare groups want a total ban on animals in circuses whereas those in the performing animal trade want greater regulation.
- All are agreed that the Performing Animals (Regulation) Act 1925 is legislation that has outlived its usefulness.

Some quotes from the responses

- Wild animals are currently held in a diverse range of captive facilities: zoos, circuses, laboratories, sanctuaries or by private individuals as pets. The biological, physical and psychological needs of each species remain constant wherever they are held yet conditions vary significantly. The consolidation of UK animal welfare legislation and implementation of the Government's proposed Animal Welfare Bill should be aimed at improving current standards and to standardise the captive conditions experienced by wild animals.

Born Free

- The concept of animals in circuses is targeted by animal rights organisations because of its relatively high profile but circuses cannot be treated in isolation. The discussion paper should encompass either 'performing animals' or 'animals in entertainment' to take into account the fact that performing animals are used extensively outside of circus e.g. in pantomimes, cabaret, ice shows, theme parks, galas and agricultural shows and other areas of live entertainment. It would be inconsistent to impose a regime on an animal because it was in a circus and not extend that regime to, for example, a magician who never works in a circus but uses live animals in his performance.

Association of Circus Proprietors'

- Animals are warehoused in circus winter quarters (performing animal training and keeping centres) over the winter, remaining in the cages in which they travelled in the summer. Some animals are additionally sent out for advertising, films and television, for public appearances, or for circus work abroad, or stabled in a zoo. Thus, a circus winter quarter is as much a fully operating business as the travelling collection of tents and wagons that is normally defined as a circus. It is the legal definition of what is, and what is not, a circus, which has further reduced protection for performing animals. The Animal Defenders would like to see performing animal training centres/winter quarters licensed, inspected, and regulated under any new Animal Welfare Bill.

Animal Defenders

THE CIRCUS ISSUE

Animal Defenders and CAPS have been placed in the "Circus Issue" category due to their commitment to banning the use of animals in circuses. We acknowledge that these organisations have many other animal welfare interests but by placing their views here we are able to present together a balanced selection of comments about the use of animals in circuses.

Animal Defenders and National Anti-Vivisection Society

Animals performing in travelling circuses should be banned?	Yes. Conclusion to their own study is despite good will circuses cannot provide adequate facilities for animals. Space in the back of a lorry is inadequate. Even use of cages is inadequate. Plus, problems with tethering with short ropes/chains. Long journeys mean long periods of time shut in a transporter as well as waiting for the circus site to be prepared. They do not meet standards laid down in DWAA or ZLA.
Licensing for circus winter quarters?	Yes. Also, inspection and regulation. Use arrangements made under Zoo Licensing Act 1981, as, in effect, the needs of the animals are the same. No current regulations satisfactorily cover circus animals in winter quarters. Dangerous Wild Animals Act 1976 is inadequate and poorly enforced.
Owners to be responsible for animals welfare?	Yes. However, circus workers are not animal experts and do not understand the animals they work with.
Is Performing Animals (Regulation) Act 1925 inadequate?	Yes. Law only provides for registration of animals trainers, who do not need to travel with the animals, nothing on animal welfare. They are not required to be familiar with exotic animals. Registration with local authority where they reside. However, registrations often out of date, not renewed regularly. No requirement to inform new LA that coming into their boundary.
What about static circuses?	They could adopt standards stipulated by DWAA and ZLA if they wish. ZLA should be amended to include animal training centres.
New standards for circuses?	No. These would be lower than ZLA.
Amend DWAA 1976?	Yes, as it does not provide for regularly updated, detailed standards. Controls are weaker than ZLA and open to interpretation. Enforcement is also weak, include powers of entry.
ZLA to be applied?	Best-drafted piece of current legislation which might be applied. Flexible but enforceable.
Winter quarters and performing animals as terms	Inadequate as does not go far enough.
1911 Act?	Inadequate for circuses as cruelty must be physical, witnessed and proven, which is almost impossible to achieve as circuses are almost constantly on the move. Also takes no account of mental suffering. Every police force should have specific animal welfare officers. local authorities should have a duty to investigate and prosecute.
Pet fairs?	These should have strict regulatory control. Purchaser must be a suitable person with suitable facilities.
Minimum age to purchase pets?	18. Purchaser must be a suitable person with suitable facilities. Possibly a home check?
Captive pheasants	Birds lack basic protection of Agriculture (Miscellaneous Provisions) Act 1968 and Animal Health Act 1981. Support proper regulation to cover hatchery stage through transportation to treatment of birds in breeding sheds. Also should cover mutilations, administration of drugs and other veterinary interventions.
Keeping exotic or dangerous animals as pets	Members of public should not be permitted to keep them as pets.
Tail Docking	Ban.
Dew claws	Lay people should be banned from removing. Procedure should only be carried out by a veterinary surgeon.
Likely to cause suffering	Current offences do not meet the need. Conviction for 'likely to cause' should be a first/second strike towards a prison sentence for subsequent offences.
Powers of entry	Police only. Other animals should be removed for their own safety.
Powers of arrest extended?	Yes.

Increased sentences?	Currently inadequate. Individuals level should be 50% higher, more for company directors. Repeated offence should be automatic prison sentences. Conviction should lead to automatic life ban on keeping of animals.
Increase time limit?	Yes.
Codes of Recommendation	Yes. Must be rigorously enforced.
Animal sanctuary – licensed?	Yes.
Livery yards – licensed?	Yes.
Farm keeping animals	Should also be licensed.
Electric Prods	Ban.
Bio-technology	Should be an offence for breeders to produce an animal likely to be defective. NAVS opposed to all GM animals used in research.

Association of Circus Proprietors of Great Britain

Narrow definition of ‘animals in circuses’	Should encompass either ‘performing animals’ or ‘animals in entertainment’ to bring in animals outside of circuses otherwise inconsistent.
Winter quarters	Fails to take account that some circuses have no permanent base and use temporary accommodation or even foreign circuses. Also fails to address individual performing animal acts visiting the UK.
Does Performing Animals (Regulation) Act 1925 need reform?	Yes. Three weaknesses: <ul style="list-style-type: none"> • Act licenses owner not the trainer; • No qualification for obtaining a license; • Inspection of trainers’ establishment permitted, but no criteria specified.
Licensing inconsistencies	Circus animals exempt from DWA licensing when within the Circus, but outside needs one.
RSPCA	Makes little reference to circuses, presumably because they see few problems.
Existing legislation inadequate?	Yes. Want legislation similar in nature to Zoo Licensing Act 1981, but which takes account of circus industry.
ACP proposals	License each animal rather than the trainer; Provide for single person per circus to be responsible; Regular inspections by veterinarians appointed by Central Government; Specific standards on cage size and exercise areas; Micro-chipping by a government approved body.
‘Standard for the Care and Welfare of Circus Animals on Tour’	To be the only technical advice available. Local authorities to insist standards are met as part of licence.
Removal of DWA exemption	No. DWA not specific enough in terms of technical or species specific information. Circus may not visit home local authority on tour if they give license. For license to be effective need regular inspection on tour and for consistency.
Licensing under DWA at winter quarters?	No.

Born Free

Government’s proposed consolidation	Yes. Provides opportunity to improve current standards and standardise captive conditions experienced by wild animals. Long overdue
Undertake programme of work	To harmonise and rationalise legislation/Codes of Practice/Recommendations
Legislation	Not made overly complicated to implement or enforce.
Ban wild animals in circuses	Circus Working Group (1998) and All Party Parliamentary Group for Animal Welfare (1999) recommended the banning of use of wild animals in circuses. Born Free Foundation receives numerous complaints about circuses and condition of animals.
Greater Regulatory controls over public and private pet fairs?	Yes.
Greater controls over buying/selling of exotic or dangerous animals?	Yes. Local Authorities should check for previous prosecutions.
Raise minimum age to buy pets	Yes. To be sure person has means to properly care for animal.
Pet Shops	Regulations need to be improved to meet standards required in zoological collections.
Animals on display but not for sale	Should fall under Pet Animals Act 1951.

Codes of Recommendation	EU Zoo Directive should be properly implemented.
Licensing of animal sanctuaries	Yes.
Electric prods	Should be banned from the training of wild animals.
1911 Act requirement of suffering before an offence committed adequate?	No.
Powers of Entry increased?	Yes.
Increased Sentences.	Yes. Longer custodial, greater fines, lifetime ban (individual/company)
Should time for proceedings be increased to 2 years?	Yes.

Captive Animals' Protection Society

Electric Prods	Support a ban, particularly on elephants. Would encourage a protected contact regime instead.
Electric shock dog collars	Support a ban.
Licensing for winter quarters	Yes, with inspection. However, believe in total ban on animals in circuses.
Pet Fairs	Cannot be adequately policed, particularly in the care of reptiles.
Tail Docking	Opposed to tail docking of dogs, unless under anaesthetic under veterinary advice and is necessary due to injury or disease. Also dislike docking of farm animals.
Time increase under 1911 Act?	Support an increase.

Heythrop Zoological Gardens Ltd.

License winter quarters	Yes. Modernise Performing Animals (Regulation) Act 1925.
Pet Fairs – greater regulation?	No. As would encourage underground selling.
Minimum age.	16, although does depend upon individual child.
Captive pheasants	No comment but disease is a major problem.
Exotic and dangerous animals.	1976 Act being reviewed. LA should employ an experienced zoo veterinary surgeon. Concern over large non-venomous snakes.
Likely to prove	Difficult to prove.
Powers of arrest	Anyone in audience should be prosecuted.
Increased sentences	Yes.
Increased time	6 months is adequate.
Codes of Recommendation	Yes, after proper consultation.
Animal Sanctuaries	Licence.
Livery stables/yards	Licence.
Electric prods	Ban in training, but self defence okay.
Bio-technology	Opposed for breeding for non-scientific purposes. Ban.

Rona Brown and Associates/Animal Filming & Training Commission

Performing Animal (Regulation) Act 1925	Should be amended to include a licensing system to replace registration system. Introduce a 'grading system' for taking a potentially dangerous animal to a film studio. The Act must be much wider e.g. television, videos, private collections, animals for commercial gain, etc.
People applying?	Should only be allowed to work species for which they have proven experience and fully competent. Eventually only those holding an approved qualification at the appropriate level (NVQs).
DWAA 1976	Should come under new Act.
Wider Act	1925 Act should not be included with other companion Acts, as this will take too long.
Code?	Yes. Specifically for animals in entertainment.

THE DOG INTEREST

Some common themes

- There is general acceptance that the laws need to be up-dated and consolidated.
- There is considerable reluctance among much of the dog interest to accept a total ban on tail docking.
- The introduction of dog identification and registration schemes remains high on the agenda.

Some quotes from the responses

- It is extremely difficult for those opposed to docking who wish to buy an undocked puppy of an archaically docked breed except from a breeder whose dogs may not be the most desirable quality. Breeders are managing to find, by courtesy of the Council of Docked Breeds, a small pool of Vets around the country (some retired, some coming from abroad and some who insist on the future care of the litter so putting higher financial reward before their veterinary code of practice and animal welfare; some are done clandestinely).
Anti-Docking Alliance
- A prohibition on docking was introduced in Sweden on 1 January 1989. This was followed by a large increase in tail injuries amongst working gundogs. The Swedish German Pointer Club carried out a survey during 1990 and 1991. The researcher followed the progress of 53 litters. In 1991 the number of tail injured individuals had increased to 92 corresponding to 51% of the group. Expressed in terms of the population born in 1989, the survey indicated that the frequency of tail injury amounted to some 35% by 1991. The report concluded: 'In other words, every third German Pointer with a long tail has suffered from more or less serious tail injuries.'
Council for Docked Breeds
- NCDL urges Government to regulate vigorously and rigorously the Greyhound Racing Industry. It is our considered view that the industry has failed satisfactorily to regulate itself in terms of breeding, boarding, racing and transportation of greyhounds. We believe it is essential that premises should be open to inspection in the same way as for other dog breeders and boarding establishments and that the animals housed may be examined.
National Canine Defence League

THE DOG INTEREST

Anti-Docking Alliance

Should docking be banned?	Yes. Cosmetic docking should be banned. 'Therapeutic' docking should be carried out by a vet under anaesthesia. The present RCVS code is being circumvented and the RCVS complaints system does not provide an adequate safeguard against vets who undertake docking for cosmetic reasons.
Dew claw removal	Ban.

Barnet Association of Responsible Dog Owners

Should there be an Animal Welfare Bill?	Yes. But also review the dangerous dogs legislation.
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Battersea Dogs Home

Should there be an Animal Welfare Bill?	Yes. The Act should address anomalies and inconsistencies. Include stray dog legislation, dog and cat identification, dangerous dogs, pro-activity in the prevention of cruelty, greyhound training establishments and puppy farms. Also end the inconsistent way in which local authorities enforce licensing requirements. Pet shops, fairs, markets are under regulated.
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Canine Crisis Council

Should there be an Animal Welfare Bill?	Yes. The Environment Act 1990 should be strengthened by making it an offence to abandon a dog or allowing it to stray. A compulsory dog identification scheme is also desirable. The Dangerous Dogs Acts should remain in force.
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Council of Docked Breeds

Should there be an Animal Welfare Bill?	Yes. There is a case for consolidation and modernisation. However, an Act must consider commercial interests as well as the demands of the animal welfare lobby.
Should tail docking be banned?	No. There is evidence that suggests the ban in Sweden has not been a success. The need for docked breeds is not confined to hunters and shooters. Drug sniffer dogs (spaniels) used by Customs & Excise and the police need to have their tails docked. The majority of dog breeders and owners of working dogs also want their dogs to continue to conform to conventional breed standards. In some breeds it is difficult to know whether a tail has been partially docked or not and this raises a question mark over the enforceability of a ban.

Endangered Dogs Defence & Rescue Ltd

What should an Animal Welfare Act contain?	Repeal of the dangerous dogs legislation.
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Greyhound Rescue Wales

What should an Animal Welfare Act contain?	<ul style="list-style-type: none"> • The licensing of boarding kennels at greyhound racing tracks. • Welfare requirements during transportation should be extended to include the transportation of greyhounds. • An independent veterinarian, appointed by the local authority, should be present throughout the duration of all greyhound races. • Animal sanctuaries should be licensed. • All re-homing organisations should record the final home of the dog under LA monitoring.
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Greyhounds - UK

Greyhounds and the Animal Welfare Bill	<p>The Bill should cover:</p> <p>The registration of greyhounds on a publicly accessible database which shows those homed, destroyed or exported.</p> <p>Until DNA identification is available all greyhounds bred for racing should be microchipped.</p> <p>Animal welfare at greyhound tracks should be regulated.</p> <p>Local authorities should be responsible for setting standards at greyhound tracks and kennels and inspection and homing services.</p> <p>An independent veterinary service licensed by the local authority should be available at greyhound tracks and to advise the local authority.</p> <p>Greyhound tracks should pay a levy to local authorities to finance both new provisions and existing dog warden services for greyhounds.</p> <p>Local authorities should be able to make grants to greyhound sanctuaries.</p>
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Guide Dogs for the Blind Association

Should there be an Animal Welfare Bill?	GDBA would welcome the opportunity to be involved if a draft Bill is prepared.
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Independent Weimaraner Rescue & Re-Homing Service

Should tail docking be banned?	No. Working dogs with undocked tails are at risk.
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Justice for Dogs

What should be in an Animal Welfare Bill?	<p>A requirement that all those dog breeders requiring a breeders licence would have to register any puppy which was sold by them if they were selling the animal as a 'pedigree' animal. In this way, because the Kennel Club publish records of all puppies registered with them, it would be possible to see where large numbers of puppies were coming from and, therefore, determine whether the breeder did, in fact, have a breeders licence.</p>
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Kennel Club

Should there be an Animal Welfare Bill	Consolidation and modernisation of laws should perhaps be 2 separate processes.
Should there be changes to the Breeding and Sale of Dogs Welfare Act	Yes. The definition of a commercial breeder should be based on the number of litters bred in a year.
Should tail docking be banned?	The KC supports the case for choice.
Should dangerous dogs legislation be included in the review.	Yes.
Should electronic dog collars for training be included in the review?	Yes. These are inappropriate training devices.

National Canine Defence League

Pet Fairs/Pet Shops	Pet Fairs/Shops encourage impulse buying. Legislation needs to address the competence/knowledge of the vendor, a ban on the sale of puppies, and raising the age at which a child can buy a dog to 16.
Tail Docking	Should only be permitted for therapeutic purposes.
Likely to cause suffering	NCDL would welcome the introduction of a new offence of likely to cause unnecessary suffering.
Powers of arrest	Should be extended to a person or persons present at an organised fight.
Sentences	Better guidance is needed from the LCD on sentencing policy relating to animal welfare charges. There is a need for better enforcement of bans on ownership.
Increased time to bring to court	Court cases should be brought as quickly as possible to allow dogs to be returned to their owner or re-homed.
Animal Sanctuaries	Should be licensed. An independent veterinarian should be involved with the local authority. Define sanctuary.
Electronic prods	Veterinarians should only hold electronic prods, collars and aids and their use strictly controlled.

The misuse of biotechnology	Legislation is likely to be unenforceable. The approach of the European Convention is preferable.
Dog fouling	Dog wardens should be given the power to levy on the spot fines.
Greyhounds	Premises, temporary kennelling, vehicles used in transportation and the competency of staff should be subject to inspection. Self-regulation has failed.
Dangerous Dogs	The legislation needs to be reviewed.
Ownership of Dogs	Need to regularise the inconsistency that exists in current law on the transfer of ownership of stray dogs.
Dog sitters/walkers	Need to be brought under regulatory control.
Animal Behaviourists/ Trainers	Concern in the rise in numbers of these paraprofessionals. Government should set standards and regulate the industry. Vets to retain overall responsibility for the animal.
Euthanasia	Article 11 of the European Convention should apply.
Tethering	Legislation should include all domestic animals.
Microchipping/Scanners	Should be mandatory for all those with a statutory duty of collecting/handling stray dogs.
Dogs as competition prizes	Should be banned.
Dogs in Housing	Blanket bans on dogs in rented or leasehold accommodation should be opposed.
Codes of Practice	Codes of Practice are to be welcomed.
Dog Identification	The DIG Report should be implemented.

National Forum of Professional Dog Users

Submission is solely about their organisation. NFPDU assists all person involved in manned guarding dog handlers sector of the security industry – raise awareness and need for a section Private Security Industry Act 2000 devoted to dog handlers.

Pro Dogs

Need for new legislation?	Yes.
Circuses	Should be brought under stricter licensing controls.
Pet Fairs	Much greater control needed. Or banned. DEFRA/police/RSPCA inspection rights should be considered.
Pet Shops	All staff should have mandatory training and certification. Minimum age of purchasers should be raised to 16.
Captive pheasants	Existing legislation is adequate.
Exotic pets	Greater control needed over supply, sale and keeping.
Tail Docking	Existing legislation is adequate.
Likely to cause unnecessary suffering	A new offence could be useful.
Increasing police powers	There is a case for doing this. Police could be accompanied by a veterinarian appointed by the local authority.
Powers of arrest	Should be extended to people attending fights.
Increased sentences	Yes for animal abuse. But there is a lack of deterrent effect due to lack of enforcement.
Increasing proceedings times	Yes. But 2 years seems on the high side.
Codes of Recommendation	Such Codes must be enforceable at law.
Animal sanctuaries/livery stables	Should be licensed/inspected by local authorities.
Electronic prods	Electric shock treatment should be banned.
Biotechnology	Strict controls are needed.
What should be included in the Animal Welfare Bill?	<ul style="list-style-type: none"> • Dog walkers. • Dog home sitters. • Animal grooming establishments. • Animal physiotherapists and osteopaths.
What is wrong with existing welfare laws	<ul style="list-style-type: none"> • Out dated Boarding Establishments Act. • Puppy farms are continuing because of loopholes.
Dangerous Dogs	The Acts are a major concern.
The CROW Act	The restrictions placed in the CROW Act on where you can take your dog are seen as anti dog owner.

Union of Greyhound Owners

What needs to be done to improve greyhound welfare	<ul style="list-style-type: none">• Improve track safety.• Appoint independent track inspectors.• Independent vets should be present at all trials and race meetings.• Stop the over-breeding of racing greyhounds.• More money should be made available for greyhound welfare.
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York Canine Association

Should existing tail docking laws be changed?	No.
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THE FARMED ANIMAL INTEREST

Some common themes

- Consolidation and modernisation of the law is generally welcomed but the agricultural industry underlines the need to ensure that the guiding principle is objectivity based on sound science.
- There is division of opinion between the industry and welfare groups concerning issues such as tail docking, the breeding of pheasants and a new offence of 'likely to cause unnecessary suffering.'

Some quotes from the responses

- A Royal Commission should be established to examine the use and management of animals by mankind.

Countryside Alliance

- An alternative approach to the 'likely to cause' offence might be a 'duty of care,' based on the five freedoms, for animals in the charge of a keeper. Failure to discharge this duty through act or omission and/or failure to respond to an improvement notice would constitute an offence. There may be need for statute provision to facilitate the use of improvement notices.

Farm Animal Welfare Council

- The concept of 'likely to cause' would lead to a twilight legal world where people who own and work with animals would be in constant uncertainty as to whether any particular action might fall foul of the law. Some farmers, for example, may withhold medicines from animals on the grounds that they believe it inappropriate to treat the animals with medicines, or that so doing would be in contravention of a particular type of farming style which they are pursuing. However, a view could be taken that the withholding of medicines would be likely to cause unnecessary suffering.

NFU

- CIWF believes that the new bill should address the problems arising from selective breeding for enhanced productivity either through a positive duty to ensure good health or through provisions dealing with selective breeding. Paragraph 29 of Schedule 1 to the Welfare of Farmed Animals Regulations (England) 2000 attempts to address selective breeding, but is couched in extremely broad language and accordingly has been unsuccessful in addressing the problems arising from selective breeding.

Compassion in World Farming

- Tail docking presents an effective procedure to minimise tail biting and the consequential suffering and injury to pigs. The research study by Guise J.J and Penny R.H.C (1998) showed very clearly that docking the tail of piglets reduces the incidence of tail-biting later in life.

National Pig Association

THE FARMED ANIMAL INTEREST

British Egg Industry Council

Likely to cause	Concerned that this would be used against systems of production permitted by law e.g. laying hens, but contrary to beliefs of an active minority of the population. Already subject to a Directive that will lead to great Capital and running costs. Also WTO will be further liberalising trade. Further increases in standards will be counter productive as lead to increased production costs and export of industry abroad.
Areas already covered by EU wide legislation	Should not be covered by further legislation.
Current 1911 provision	Valid.
Biotechnology	Industry avoids use because of current consumer perception. We must remain scientifically based. Also third country import argument.

British Poultry Council

The scope of the Animal Welfare Act	The primary legislation should lay down broad welfare principles applicable across all animal use but should not attempt to address all the detailed aspects listed in the consultation document. To do so would risk details of the Act becoming rapidly obsolete as scientific knowledge advances or social values evolve. Any legislation should follow the existing EU legislative requirements and not impose additional requirements. This would prevent the risk of a company with farms in England, and Wales, and in Scotland, from facing different animal welfare requirements. Consistency, consolidation, clarity needed for broader welfare needs of all categories.
Should there be a new offence of likely to cause unnecessary suffering?	No. This would be open to too wide interpretation. 98/58/EC Article 3 is preferred - '...to ensure that the owners or keepers take all reasonable steps to ensure the welfare of animals under their care and to ensure that those animals are not caused any unnecessary pain, suffering or injury.'
The mis-use of bio-technology in animal breeding	Genetic modification is not undertaken in poultry meat breeds, but the door should not be closed to potential future biotechnological developments. Selective breeding programmes for food producing animals should seek to balance 'commercial' and 'welfare' traits to produce animals that are not genetically defective. 98/58/EC, Annex paragraphs 20 and 21 already covers breeding procedures and UK legislation should not go beyond this. There is a risk of giving encouragement to vexatious allegations across many farmed animal breeding programmes.

Compassion in World Farming

Likely to cause	Yes, as it would prevent suffering before it occurred.
Recognition of animals as 'sentient beings'	Should be included in the Bill following the Treaty of Amsterdam protocol. Member states shall pay full regard to the welfare requirements of animals in formulating and implementing the Community's policies on agriculture, transport, the internal market and research.
Positive duty to promote good health and welfare	Present thinking recognises need to go beyond prohibiting cruelty and/or the imposition of pain and suffering to ensure good health and a positive state of well-being in animals. E.g. failure to treat sheep lameness or pigs in old, damp, poorly ventilated conditions. Also selective breeding for enhanced productivity (broilers). Paragraph 29 of Schedule 1 of WoFAR tries but is too broad in terms of language.
Animals should not be kept in ways, which fail to meet their physiological and ethological needs. Should be kept to promote good health, wellbeing, without pain, suffering, and distress.	98/58/EC and European Convention on the protection of animals kept for farming purposes enshrine principle that farm animals should not be kept in ways, which fail to meet their needs. Animal Welfare Act should incorporate this principle.

Mutilations	Routine use should be phased out by new act. Tail-docking of piglets and de-beaking hens should be prohibited with reasonable phase-out. Therefore sufficient straw for pigs and enough space to prevent over-crowding. Good quality litter for hens, plus sufficient space and large flock sizes.
Pheasants	Ban. Alternatively, proper controls, such as keeping of pheasants in over-crowded conditions, use of 'blinkers'.
Inefficacy of Banning orders	Disqualify someone not only from 'having custody' but also from owning them, having them under his control or attending them. (c.f. wording in Section 1 of the Company Directors Disqualification Act 1986).
Biotechnology	Opposed to GM and cloning developments in animals.

Country Land and Business Association

Act	Welcomes move to consolidate and simplify legislation. Practices have moved on since 1911.
Pheasants	Supports Game Farmers Association and the National Gamekeepers Organisation. Practices already ensure positive welfare. Self-regulating industry, governed by a Code of Practice. If needed, Code should form basis to regulation.
Tail docking	Done for positive welfare considerations – to prevent working dogs suffering tail injury, which is distressing and deeply painful. Against further restrictions, above those requiring the operation being undertaken by a qualified vet.
Likely to cause	Deep reservations. Cruelty already covered by existing legislation with clear definitions. Extension of existing definition is liable to cause difficulties as subjective. Alternative of 'a duty of care'?
Increase police powers	Unaware of current difficulties.
Increased sentences	Current ones are adequate.
Increase time for proceedings	Not aware of a problem, therefore remain at 6 months.
Codes of Recommendation	1968 Act Codes work well.
Livery stables/yards	CLA favour self-regulation backed by a voluntary code of practice.
Electric prods	Used without any obvious distress to stock. Would be significant safety implications for stockmen denied their use.

Countryside Alliance

Should animal welfare legislation be modernised?	Yes. Current legislation is piecemeal and incoherent.
Should there be Codes of Practice?	Yes. Where appropriate.
The welfare of captive pheasants bred for sporting shooting	Should be dealt with by a voluntary code.
Keeping exotic or dangerous animals as pets	Clarification is needed of the meaning of exotic or dangerous.
Should tail docking be banned?	Tail docking is undertaken on welfare grounds in a wide range of gundog or terrier breeds used in connection with shooting, falconry and hunting. It is necessary because of the risk to dogs in dense cover or in the case of terriers, below ground. Following a prohibition in Sweden in 1989, the Swedish German Pointer Club followed the progress of 53 undocked litters. By 1990 38% had suffered tail injury. By 1991 the figure had risen to 51%. The decision to dock should be left to the judgement of individual veterinary surgeons.
Should there be a new offence of likely to cause unnecessary suffering?	No. It is an extremely wide ranging, subjective phrase. 'Intentional infliction of unnecessary suffering' is preferable.
Should the powers available to the police be increased?	Any new powers should remain with the police.
Should the time allowed for proceedings to be brought before a court be increased?	No. This could be detrimental to the welfare of any animals that may be involved.
Should the maximum term of imprisonment available under the 1911 Act be increased?	No.

Empowering the Secretary of State to make Codes of Recommendation	This is acceptable with regard to animals kept for commercial purposes but caution is needed with regard to companion animals. Human Rights legislation needs to be considered. Any proposed codes should be subject to preliminary public consultation.
Should livery stables/yards be licensed?	The case is not proven. A voluntary scheme would be preferable.
Other issues.	<p>The 5 Freedoms are welcome. However, they will lead to an increase in production costs. The Government should:</p> <ul style="list-style-type: none"> • Incorporate animal welfare standards into global trade negotiations; and • Develop food product labelling. <p>Live exports and animal transport:</p> <ul style="list-style-type: none"> • Safeguard remaining rural abattoirs; and • Rigorously enforce transport regulations.

Farm Animal Welfare Council

General comment	Restricted to farm animals but recognises species not always found on agricultural land and level of protection varies. Protection of an animal's welfare should be relevant to the animals and not to its location.
Single Act	Similar to Germany and New Zealand. Definitions such as farmed animals, holdings and agricultural land would need to be addressed.
Enforcement	Nothing should be lost. Simply improved and made consistent. See 1990 and 1999 FWC Enforcement Reports.
Horses	Need to be clarity. Not clear where they are 'agricultural' animals.
Devolution	Consistently strong legislation across GB please.
Likely to cause	Could enable enforcement action in situation where obvious an animal's welfare is compromised, but not actually suffering. Authorities should not have to wait. Recognise need to safeguard against claims that actions taken where unlikely to happen. Need to tightly define. c.f. Transport and child protection legislation. Danger of 'likely to cause' when bad weather.
Duty of care	Alternative to 'likely to cause...' Based on five freedoms. Failure to discharge duty or respond to improvement notice would constitute an offence. Need Statutory notices provision.
Enforcement powers	Consolidate Act might best designate enforcement authorities. Multi-agency approach should have defined powers and consistent with expertise needed in case. Should be discretion for notices to be issued. Also power to take custody of animals before suffering.
Abandonment of animals	Needs to be added to Bill. Police responsibility is out of date. Also Police attendance and authorisation for slaughter is dated.
Local authority powers	1968 Act - not designated under this Act but well qualified to do so.
Time limits	Yes, increase to 2 years. 6 months too short.
Codes of Recommendation	Current Codes are out of date. Need to be updated regularly. Every 5 years?
Disqualification	Transfer of ownership within family and still having day to day contact is unacceptable. Tighter definition of 'custody' of animals is needed to set out what contact is permitted.
Pet fairs	Protection needed as on the farm, including animal health provisions. Single Act regardless of location would deal with this. Passport arrangement for limited private sales between individuals.
Captive pheasants	Currently insufficient protection – outside agricultural legislation. Different standards for meat and sport. Principle is that should have same standards applied.
Tail docking – farm animals	Any mutilation should be to benefit of animal concerned or immediate companions. Legislation in place is satisfactory, subject to outstanding FAWC recommendations.
Tail docking – dogs	In principle, FAWC believes wherever a mutilation is unacceptable on grounds of welfare it should be illegal. Exemption on grounds of clinical need. Records should be kept.
Increased sentences	Few offenders are imprisoned, most are fined. Good opportunity for improved guidance to magistrates dealing with animal welfare cases.
Biotechnology	Area of concern to FAWC – report on its way. Recommendation of controlling authority will be included.
1990/1999 Enforcement Reports	Many of already in response. Also compliance with subsidy payments, need to simplify cross border authorisation for local authority inspectors.

Stockpersons	Requirement (preferably statutory) for training and compliance testing remains a matter of principle. Educational sector will respond to demand.
Investment	Needed in farm animal welfare skills base (See Policy Commission submsn).

Farm Animal Welfare Network (incorporating Chickens' Lib)

Should circus animals be banned?	Yes. Failing that licence winter quarters, accommodation and transport standards.
Pet Fairs	Make it illegal to give pets as prizes, including goldfish.
Pet Shops	Minimum age should be 18. Re-introduce dog licences. Only licensed out-lets should be allowed to sell pets.
Welfare of captive pheasants	There should be a worldwide ban on the debeaking of gamebirds, and on the use of bits, 'specs' and brails.
Keeping of exotic or dangerous animals as pets	Should be banned.
Tail docking of dogs	All tail docking of dogs should be banned.
Tail docking of farm animals	Such practice reflects bad husbandry.
'Likely to cause unnecessary suffering'	For domestic animals 'likely to cause suffering' is preferred. Define "unnecessary".
Increasing the powers of police when investigating allegations	Police officers should be able to enter farm premises with or without DEFRA or any other officials, if a welfare complaint appears to be genuine and serious.
Powers of arrest	Those attending animal fights should be liable for arrest.
Increased sentences	Sentences should apply. There are instances of farmers who are banned from keeping farm animals, continuing to keep and trade in them.
Should the time allowed for proceedings to be brought before a court be increased?	Yes.
Should the Secretary of State be empowered to make welfare codes?	Yes. Provided that codes do not discourage awareness for the need for changes in legislation.
Animal Sanctuaries	Should be licensed.
Livery stables/yards	Should be licensed.
Electronic prods for training	Should be outlawed.
Bio-technology in animal breed	Genetic engineering of farm or domestic animals is unacceptable.

Halal Food Authority

Electric prods	Ban.
Biotechnology	Opposed. Some intensive systems should be classified as 'cruelty to animals'.
Cock and bull fighting	Ban.
Domestic pets and pet owners	Responsible for any adverse action or injuries to others.
Tethering	Not excessively.
Performing animals/circuses	Always be well kept, fed and rested properly.
Slaughtering, rearing of animals	As humane as possible.
Tail docking	Sheep. Mutilated animals are unclean under Muslim ritual slaughter. There should be illegal and punishable offence. If needed, then should be performed by someone trained and qualified to do so.

Meat and Livestock Commission

Welfare of cattle, sheep and pigs	Already well provided for in current domestic and EU legislation. 5 Freedoms are widely appreciated.
One piece of legislation	Welcomed to reduce confusion and improve clarity.
Agriculture (Miscellaneous Provisions) Act 1968	Should be included.
Likely to cause	Difficult to see what this would add to 'unnecessary pain and unnecessary distress' and 'unnecessary suffering'.
Increase proceedings to 2 years	Yes.

National Farmers' Union (NFU)

Scope of legislation	Welcomed as long as based upon guiding principle of objectivity based on sound science.
Pheasants	Support views of National Gamekeepers Organisation and Game Farmers Association.
Exotic or dangerous pets	Expect normal animal welfare considerations to be applied where they are farmed
Tail docking	Sheep is standard practice with welfare benefits. In pigs, needs to continue to prevent tail biting. Dogs – continue.
Likely to cause	Strong reservations. Would lead to constant uncertainty whether a particular action would lead to prosecution. If created would need strong safeguards e.g. if in good faith or on basis of scientific or veterinary advice.
Codes of Recommendation	Codes of practice - better way of encouraging good welfare rather than new offence. System well understood in farming world and is of material assistance in delivering high standards of welfare for farm animals.
Increase police powers	Accept flaws in 1911 Act and accepted need for 2000 Act.
Increase time for proceeding	No strong case.
Livery yards/stables – license	No case, as owners quick to notice shortcomings in treatment.
Electric prods	Clarification is needed e.g. training collars can be useful in training of sheep dogs. No evidence they can cause suffering to animals.
Biotechnology	Clarification of 'genetically defective' needed.
Next steps	New law should be based on clear need and best scientific judgement. New law will be challenging and support publication of a draft Bill for further consultation.

National Pig Association

Tail docking	Concerned that tail docking of pigs will be included. Procedure needs to be retained to prevent suffering to pigs.
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Royal Agricultural Society of England and the English Panel of the Fellows of the Royal Agricultural Societies

Bill	Sensible to update legislation. Should take account of existing Government policy and ensure that it's going in the same direction. Accept that sensible legislation is needed to enforce modern standards.
Structure	Would one Bill for commercial and one for pets be better? Definition of 'farmed livestock' open to confusion.
Devolution	Should be applied equally across the UK. Standards should be compatible with those at EU and world level.
Proportionality	Majority of farmers do their job well and should not be penalised for the minority, particularly in incurring additional expenditure.
License to farm	Include in Bill. Would remove need for Quality Assurance schemes.
Training	Compulsory for key livestock management skills.
Bovine TB and other animal disease	More stringent checks on imports at point of entry into the UK. Enlarge SVS.
Burial	Implementation of EU legislation in 2003 banning burial of fallen stock will mean less time for farmers to care for living stock. Odd that domestic pets can be buried anywhere.
Electric prods	Useful for managing farm animals. Use by competent people must be allowed to continue.
Biotechnology	Sensible recommendations of FAWC should be supported.
Artificial Insemination	Regulations need updating to include checks for disease and licensing of Bulls.
Poultry	If cages for laying hens banned then poultry sector would collapse and imports increase.
Pigs	Outdoor housing is perceived as more welfare-friendly than indoor – evidence does not support this. Management if the Unit is what counts. Should have licensing of premises and training.
Tail-docking	Of sheep or pigs in first 24 hours is not painful. Important welfare reasons e.g. fly-strike.
Slatted Floors	FABBL forbids this design. Need to take a holistic view.
Livery stables/yards	Care & ownership of equines – largely unregulated. Who to regulate? - business that rent out stables, or owners who care for the animal. Suggest a Certificate of Competence for owners. Equine Ind Welfare Guidelines - basis to legislation.
Animal sanctuaries	Licence.
Farming systems	Treat all equally.
Prosecution	Strengthen provisions including longer sentences and so individuals cannot transfer to other members of the family.

Scottish Landowners' Federation

Consultation should be England and Wales only?	Proposed legislation would not be applicable in Scotland. Would be interested if Scottish Ministers proposed a similar Bill.
Review	Overdue. Will have a number of comments when proposed changes are due in Scotland.

Soil Association

Soil Association asserts...	That Organic farming leads to higher welfare standard. New Bill is needed to reflect the growing demand by consumers who want higher welfare. Endorses CIWF view with four points:
Develop Organic sector	A non-regulatory way to improve welfare.
Phase out industrial farming	Needs to be drawn up to medium to long term.
Improve animal welfare standards in short term	<ul style="list-style-type: none"> • Maximum stocking densities. • Maximum journey times. • Maximum lighting times. • No close confinement. • Prohibit certain breeds. • No genetic engineering practices. • Prohibit inappropriate diets. • Prohibit all routine mutilations. • Labelling requirement to show animal welfare standards.
Animal Health Strategy	A way of reducing the cost of agricultural industry to the Government. National plan for positive development of animal health and welfare.

Vegetarian Economy and Green Agriculture

DEFRA initiative	Applauded. Want a radical revision.
Terminology	Removal of 'unnecessary' and 'undue'. Define cruelty/suffering, etc.
Imports	EU must meet same standards as in the UK.
All handlers/owners	Should be trained and licensed.
Farms, markets, shops, sanctuaries, premises, courses where animals kept etc.	Registered and licensed by National authority. local authorities to have rights of unannounced entry and officials they may nominate e.g. RSPCA, FAWC, vet.
Veterinary profession	Held responsible for exercise of practitioners' vocational vows on condition and treatment. May need further licensing.
Identification.	All animals.
Five freedoms	Good basis. Codes of practise are not adequate.
Excessive breeding	Ban.
Mutilations	Routine ones for frivolous purposes should be banned.
Circuses/zoos	Same as conditions on farm, for pets etc.
Pet fairs/shops	Public and private events only in presence of professional veterinary officers.
Captive game	Ban.
Exotic/dangerous animals	These practises will be reduced on grounds of health and welfare.
Dealing with alleged offences	Sentences and penalties for offences should be increased. Resources available for enforcement are limited and inadequate. Need national agency.
Codes of Recommendation	Yes. Proceedings should be tilted more strongly to prompt resort to law to prevent abuse.
Sanctuaries, livery yards	Licence.
Electric prods	Ban.
Bio-technology	Ban – various examples included.
Animal Welfare Bill	Not an adequate title 'Reduction of Harms to Animals Bill'.

Verderers of the New Forest

Likely to cause	Yes. Form of words already in Byelaw 11(d). Benefit is action can be taken before suffering occurs. Weakness is one of interpretation as impossible to prove and open to some misinterpretation.
Tail Docking	Yes, except for pigs and sheep. Also against shaving if tails of heavy horses.
Electric prods	Ban.
Powers of entry	Remain solely with police. Entry for RSPCA Officer, TSO and Veterinary Surgeon should only have power when in the presence of police officer.
Proceedings	12 months only.
Livery Yards	More than 10 stables should be licensed.
Animal sanctuaries – license?	Yes.

Exotic/dangerous pets.	Greater controls.
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THE FISH, AQUATICA AND REPTALIA INTEREST

Some common themes

- Pet Fairs should continue under licensing control.
- The minimum age at which a child can buy a pet should be somewhere between the ages of 12 and 16 years.
- Codes of Recommendation should be left to the experts and not Parliament.

Some quotes from the responses

- We think it is fair to say that given the current public attitude towards reptiles and the recent, unwelcome and misinformed attention of Animals Rights groups, our members are understandably nervous about the threat of any unwelcome, unnecessary legislation.

The arkgroup.org

- Pet fairs: should there be greater regulatory control over public and private pet fairs? This question would suggest that pet fairs are currently legal and in need of further controls and regulations. There appears to be a great deal of confusion relating to the legality of pet fairs particularly involving reptiles. The Animal Rights group, Animal Aid, have taken it upon themselves to launch a vendetta against the Reptile Hobby and have spent a lot of time and money finding novel ways of reading the current Animal Welfare laws in an attempt to prove to local councils that reptile fairs are illegal.

The hobby is now in a position where we have been told by the Chartered Institute of Environmental Health (CIEH) that after consultation with a number of Animal Welfare groups (though no one in the Reptile Hobby or, it would seem, other pet related hobbies were consulted), they consider animal fairs that are open to the general public can not be issued with a pet shop licence and are illegal.

In the past, a lot of work went into these events to raise the public awareness and opinion of Reptiles and Amphibians.

The arkgroup.org

In order to function the Koi industry requires that Koi shows remain regular events. The current situation has demonstrated to the PKDA that obtaining authority to hold a Koi show is not controlled by trading legislation or even genuine animal welfare considerations it is now merely a geographical factor. Some councils being willing to grant permission for shows and others not.

Professional Koi Dealers Association

FISH, AQUATICS AND REPTALIA INTEREST

Arkgroup.org

Should there be greater regulatory control over public and private pet fairs?	Introduce a specific licence under the title of 'Pet Fair Licence.' This should only be issued to events in suitable venues that meet good animal welfare requirements. All dealers, amateur and professional, should have to meet clearly set out standards of caging. The animals are only in these cages for the duration of the show and it would be unreasonable to expect full size everyday enclosures to be used. The use of smaller cages for shows is consistent with government policy towards animal transportation and animals in scientific experiments. All shows should have a pre-agreed minimum amount of stalls/stands dedicated to public and hobbyist education and should not just be a buying and selling event.
Should the minimum age at which children can buy pets be raised?	14 years would be the preferred age but certainly not above 16 years.
Should there be greater controls over the buying and selling of exotic or dangerous animals?	No. The DWAA, which is currently being reviewed, deals with dangerous wild animals and there are also CITES controls. How do you define an exotic? A hamster is an exotic as a reptile. All animals have the potential to inflict injury or spread disease and it should be mandatory for all animals to be sold with a care sheet.
Should there be a new offence of likely to cause unnecessary suffering?	This is open to varied interpretation. More pro-active legislation to deal with illegal animal fighting would be useful but it would be more appropriate to use 'likely to cause suffering.'
Should the powers of entry, search and seizure be changed?	Police powers should be the same when investigating animal related offences as when investigating any other crimes of a similar severity.
Should the power of arrest be extended to a person present at an illegal animal fight?	Yes.
Should maximum sentences be increased?	No.
Should the time allowed for proceedings to be brought before a court be increased?	No. Particularly undesirable when an animal is being held 'in limbo.'
Should the Secretary of State be allowed to make Codes of Recommendation?	No. It is likely that they will be too much influenced by Animal Rights Groups.
Should animal sanctuaries be licensed?	No.
Use of bio-technology	No. Advanced genetic engineering should be the responsibility of the Home Office. Straightforward breed crossing has resulted in most of our farm animals.
What introduction would ARK like to see.	<ul style="list-style-type: none"> • An import tax on wild caught animals to encourage breeding from captive stock. • An immediate import ban on species experiencing 'craze buying.' • Better regulation of the transit of reptiles and amphibians.

Association for the Study of Reptilia and Amphibia (ASRA)

Should pet fairs be licensed?	There should be regulatory acceptance of these fairs.
Pet shops	The minimum age at which a child can buy a pet should be raised to 16 years. Staff should be trained and should provide 'husbandry' information from recognised sources.
Keeping exotic or dangerous animals as pets	'Dangerous Animals' legislation should remain separate from animal welfare legislation.
The creation of a new offence of 'likely to cause unnecessary suffering'	The law regarding the mistreatment of animals must demonstrate an actual adverse effect and not just likelihood, which in itself is a subjective judgement.
Increase the time allowed for proceedings to be brought before a court	Any increase in the amount of time between initial seizure and court proceedings can only serve to increase the suffering of the animal/s and keeper/s concerned.
Animal sanctuaries	There should be regulation of sanctuaries.
Bio-technology	Genetic engineering is a separate issue best covered by its own legislation. Selective breeding will be covered by welfare legislation if it is known, or can be shown, to cause suffering to an animal.

British Koi-Keepers' Society

Pet Fairs	Koi shows should be allowed to continue. These shows are open to, and visited by the public and not just members the dissemination of knowledge and advice is spread far and wide.
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International Herpetological Society

The principle of a new Animal Welfare Bill	Broadly welcome.
The age at which a child can buy a pet	Should remain at 12 years.
Keeping exotic or dangerous animals as pets	No legislation required - the DWAA already deal with dangerous animals.
The creation of a new offence of likely to cause unnecessary suffering	Concern over the word 'likely' - there is a need to include intention and reckless. There is also the Human Rights Act 1998 to consider.
Increase the powers available to the police when investigating offences	The powers in the 1911 Act are adequate and comparable to similar offences.
Increasing the time allowed for proceedings to be brought before a court	This would be inappropriate.
Providing the Secretary of State with powers to make Codes of Recommendation	Leave it to the experts. In the case of reptiles, the experts are the Herpetological Society.
Pet Fairs	If organised by bona fide societies and clubs they should continue. The welfare of reptiles and amphibians at shows is superior to those laid down for animals in transit.
Animal Sanctuaries	Should be licensed.
Mis-use of bio-technology	Introduction of controls could be detrimental to animal welfare.

Ornamental Aquatic Trade Association

Pet shops	Concern over the varying local authority licensing standards across the country.
Powers of Environmental Health Officers to gain access to premises	The right of entry is lost when a pet shop licence is refused or withdrawn. This is an anomaly that needs to be addressed.
Age at which children can buy pets	Between the age of 12 and 16.
One day pet fairs	Should be licensed, but exempt member only events.
Abandonment of Animals Act 1960	This Act works well.
Introduction of a new offence of likely to cause unnecessary suffering	Yes but only acts which will lead beyond reasonable doubt to unnecessary suffering should be subject to prosecution.
Time allowed for proceedings to be brought before a court	Proceedings should be brought within 6 months of the offence.
The keeping of dangerous or wild animals as pets	The DWAA already covers dangerous wild animals. An extension to exotic animals would be an infringement of civil liberties.
Codes of Recommendation	Are not appropriate for pet animals.
Mis-use of bio-technology	Genetic modification does not have any part to play in the pet fish industry.

Professional Koi Dealers Association

Should there be an Animal Welfare Bill?	Yes.
Pet Fairs	Should continue. The PKDA already sets standards for the welfare of koi being sold at fairs.

Reptilian Magazine

Pet Fairs	Should continue. They provide members of the public with the opportunity to discuss husbandry with the experts. They also help educate the young. The risk of catching disease from reptiles is minimal with careful handling. Banning fairs would be contrary to the Human Rights Act 1968. Animal Fairs open to the public should therefore be designated as not needing a Pet Shop Licence, or at the very least local authorities should be obligated to issue licences. Member Only events should not be licensed.
Keeping exotic or dangerous animals as pets	The DWAA already covers the keeping of dangerous animals. 'Exotic' is not a precise definition. It seems to be built on the false premise that reptiles are dangerous to keep.
Pet shops	Do not change the current age at which children can buy pets.
The introduction of a new offence of likely to cause unnecessary suffering	It might seem entirely reasonable to be able to take action before an offence is committed; the practicalities of such however seem insurmountable.
Powers of arrest	There is concern over the way that the RSPCA brings private prosecutions. As a private charity they are not subject to the Human Rights Act 1968.
Increasing the time for proceedings to be brought before a court	Could be open to further abuse. Should be as quickly as possible.
Codes of Recommendation for exotics	Difficult to do in view of the uncertainty about what is an exotic species. Does the definition include hamsters and stick insects?
Animal Sanctuaries	Should be licensed.
The activities of Animal Aid	Concern is expressed regarding the activities of Animal Aid in preventing reptilian owners from carrying out their lawful business.

THE GAME INTEREST

Some common themes

- The game industry would prefer self-regulation to statutory regulation.
- Why change laws that have worked well for 100 years.
- Tail docking is essential for working dogs.

Some quotes from the responses

- The consultation letter asks whether the law provides adequate protection for the welfare of captive pheasants that are bred for sport. The term 'captive animal' already covers animals in the process of being reared for sport shooting - pheasant, partridge and mallard - as defined under section 15 of the Protection of Animals Act 1911. We have been unable to find a single case in which the RSPCA or any other organisation has been unable to bring a prosecution if it has wished to do so. We therefore believe the law is sufficient and question its inclusion in the scope of the consultation.

The British Association for Shooting and Conservation

- The Code of Practice produced by the Game Farmers' Association is widely acknowledged as the 'standard' for game rearing and receives widespread support. Birds reared for shooting need to be healthy, fit and well adapted to the wild. Rearing systems have been specifically designed for the short-term requirements of gamebirds, from day old up to six weeks of age when they are released in to the wild. To try and draw parallels between the requirements needed by commercial poultry operators and birds reared for shooting is wholly inappropriate.

The British Association for Shooting and Conservation

- We would prefer to see self-regulation of pheasant rearing through the code by the Game Farmers Association and the National Gamekeepers Organisation than having practices prescribed under new legislation. We think the Government should consult FAWC on the adequacy of the code and its adoption by most game farmers and gamekeepers. This would mean that non-compliance with the code could be used as evidence for the prosecution in animal welfare cases.

The Game Conservancy Trust

- British game farmers are increasingly under pressure as a consequence of imports of live game from the Continent. We cannot allow another important aspect of the rural economy to be blighted by 'gold plating' in excess of the requirements of EU legislation.

The Game Farmers' Association

THE GAME INTEREST

British Association for Shooting and Conservation (BASC)

Should the 1911 Act be revised?	No.
The welfare of captive pheasants bred for sport	The existing law is adequate. The Code of Practice produced by the Game Farmers' Association is the standard for game rearing and receives widespread support.
The creation of a new offence of likely to cause unnecessary suffering	Opposed to the creation of such an offence. Too subjective. The government should spell out what offences are not covered by the 1911 Act.
Tail Docking	Some working dogs will suffer unnecessarily if their tails are not docked (those involved in shooting). Oppose ban; owners choice.
Powers of Entry, Search & Seizure	'Non commercial' and 'Animals kept for recreational sport and competition' were excluded from the extension given in the Protection of Animals (Amendment) Act 2000. BASC would support the 'adoption of that guidance' in any new Act. Powers of entry should only be given to the police and then only with a warrant.
Using electronic prods for training	These are not used in sport shooting.

Game Conservancy Trust

Need to review legislation?	Yes.
Should farm animals be included in an Animal Welfare Act	Animals of similar taxonomy should be treated in a similar manner. It is illogical that it is acceptable to dock a lamb's tail on animal welfare grounds whilst docking the tail of some types of working dogs might not be.
The welfare of pheasants bred for sport	Reared or captive pheasants and other gamebirds (including mallard) are domestic fowl and should be subject to the same standards as domestic fowl, ie: the Agriculture (Miscellaneous Provisions) Act 1968. The Game Farmers Association 'Code of Practice' sets an excellent standard and self-regulation rather than practices prescribed by legislation may be preferable. Consult FAWC.
The creation of a new offence of likely to cause unnecessary suffering.	An attractive proposition but likely to be unworkable, e.g., the nonsense of trying to prosecute a pensioner for over-feeding the cat.
Increasing the powers available to the police when investigating offences	Better training and better access to vets is what the police need.
Powers of Entry, Search & Seizure	The existing powers are adequate.
Sentences	Current maximum sentences are adequate but under used. In cases of proven, deliberate cruelty a complete lifetime ban should be considered.
Codes of recommendation	Why the need? FAWC should be the central body for endorsing codes for farm animals and gamebirds.
Animal sanctuaries	This is a real issue - particularly with regard to the release of animals back to the wild. Also, great care needed to look after wild animals in captivity.

Game Farmers' Association

Should there be an Animal Welfare Bill	Yes, but careful review. Animal husbandry has moved on but take care when you are dealing with legislation that has worked well for nearly 100 years.
The welfare of pheasants bred for sport	The existing legislation is adequate. Game farming is about the production of a bird that can survive in the wild and has different needs to a domestic fowl.
The GFA Code of Practice	The GFA Code is a success and it is rooted in MAFF Codes.
Further consultation	DEFRA officials need to visit some game farms.

Gamekeepers National Association

Tail Docking	Tail docking is necessary for working spaniels.
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National Gamekeepers' Organisation

Should there be an Animal Welfare Bill	Agree that an update of 1911 Act is needed. This is a tricky area and the consultation letter is clearly a response to the wishes of the welfare lobby.
The welfare of pheasants bred for sport	The industry is well able to regulate itself and does not require legislation.
Tail docking	Tail docking is necessary for working breeds.
The creation of a new offence of likely to cause unnecessary suffering	We need a law that makes the action infliction an offence. An offence of likely to cause unnecessary could for instance make it an offence to own a horse that is going to run in the Grand National.
Powers of Entry	'Non commercial' and 'Animals kept for recreational sport and competition' were excluded from the extension given in the Protection of Animals (Amendment) Act 2000. NGO would support the adoption of that guidance in any new Act. Powers of entry should only be given to the police and then only with a warrant.
Should the Secretary of State be empowered to make Codes of Recommendation	No.
Electronic Prods	Electronic dog collars are useful in the game industry. The 1911 Act guards against their excessive use.

Union of Country Sports Workers

The welfare of pheasants bred for sport	There is no incentive for game rearers to neglect the welfare of game birds.
Tail Docking	Tail docking is necessary for working breeds.

Wales' Opponents of Pheasant Shooting (WOOPS)

Is pheasant shooting a cruel industry?	Yes.
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THE HORSE INTEREST

Some common themes

- Yes to a new offence of 'likely to cause unnecessary suffering.'
- Yes to the licensing of livery yards/stables.
- Yes to the licensing of animal sanctuaries.
- Tethering needs to be addressed. Possibly through a Code of Recommendation.

Some quotes from the responses

- The ILPH believes that those running a company based around the care of horses (be they charitable welfare organisations or livery yards) should exhibit and should be responsible for ensuring, a good level of husbandry within the business.

Riding establishments are licensed, as are boarding establishments. There appears to be no reason why other similar businesses should be considered to be exceptions. With the Government currently encouraging farmers to diversify into the horse industry and an increase in 'new' horse owners using livery facilities there is the potential for the blind leading the blind into welfare problems.

International League for the Protection of Horses

- All too often animal welfare charities may get a case to prosecution but because of, in some cases, appalling judgement by local magistrates or the law not giving the magistrate enough guidance to support a conviction, time and again equine groups lose heart by having to return cruelty cases back to the perpetrator, only to have to pick up the horse again in another few months and to start the entire procedure again.

Thoroughbred Rehabilitation Centre

- It is possible under current legislation for horses to be tethered in one place without exercise. The tether point can be moved but a few feet to satisfy the law. The key must be to enshrine in law a 'quality of life' which an animal can reasonably expect. Thus, a horse should be allowed the freedom to move untethered for significant periods. It should be up to the owner to prove such unhindered movement is being provided, not for the prosecution to prove to the contrary.

Equestrian Support Services

HORSE INTEREST GROUPS

Arab Horse Society

Likely to cause	Yes.
Powers of entry etc	Extend, only to major equine welfare organisations (HAPPA, ILPH and the RSPCA).
Length of proceedings.	Yes to two years.
Codes of Recommendation	Probably not feasible with equines.
Licensing animal sanctuaries	Question of cost and a need for further clarification. What about a register with visits from major organisations.
Licensing Livery yards/stables	Same problems.

Association of British Riding Schools

Proposals	Support any change if welfare of horse improved.
Code of Practice needed	To ensure legal action, strength to police, RSPCA, local authorities.
Powers of entry	Should be increased.
Livery Yards	Too many with little legislation/control. Yard, sanctuaries (and riding schools) should be licensed.
Conditions at public sales and markets	Poor.
Passports	Doubts about plans for riding schools.

British Horse Society

Winter quarters	Yes.
Borderline cases	Extend scope of 1911 Act to include these cases.
Police powers	Must remain with the police. Need for consistent enforcement and sentencing. Provision for secondary legislation.
Codes of Recommendation	Yes, must be subject to prior consultation.
Licensing Animal Sanctuaries	Yes. Plus inspection by qualified inspectors.
Livery yards	Yes.
Electric prods	Ban.
Bio-technology	Offence if cause unnecessary suffering.
Straying and tethering	Local authority should take greater responsibility. Code of Practice for Tethering should be part of the Act.
Riding Establishments Acts	Improve enforcement and include Trekking Centres within legislation. License and inspect.

British Horse Society Scotland

Protection of Animals (Scotland) Act 1912	Needs updating. Courts require animals to be seen to be suffering before action can be taken. Recommend offence to act or fail to act in a manner likely to cause unnecessary suffering. Such an offence would allow relevant authorities to act before suffering occurs - modernisation. Max penalties currently: 3 months imp and/or fine of £5,000. New offence should be tried on indictment and raising max pen to 3 years imp and/or unlimited fine. Offences should be taken more seriously.
Riding Establishments Acts 164 & 1970	Some licensed establishments not approved by BHS Scotland have poor standards of welfare. No current requirement to have enough space/acreage for the horses - Recommend that acreage is considered in new legislation. Recommend that access to safe off-road routes be a requirement for riding schools. Recommend that commercial right for access be re-instated into the Land Reform Bill. Recommend tuition only be provided by qualified equestrian instructor. Recommend that inspections should be sub-contracted out to BHS Scotland as local authorities have little experience of standards required.
Licensing of livery yards?	Yes. Concern over welfare, client safety and safe tuition. Also concern at the increase in number of yards partly due to Government encouraging farmers to diversify farms into livery yards. No records kept. Concern that unlicensed yards bring industry into disrepute. Unlicensed yards invariably evade planning permission and business rates - puts financial pressure on licensed riding schools. Strong feeling that "Homes for Rest" for horses should also be licensed.

Livery yards plan	BHS will launch its new livery yard plan in July 2002 - a system of approving livery yards. Provide a database. Scheme approved by ILPH, BEVA and RSPCA.
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Dartmoor Pony Society

Powers of arrest	Remain with the police.
License animal sanctuaries	Yes and subject to inspection by suitably qualified and trained inspectors.
Livery yards	License.
Electric prods	Ban.

Devon Horse and Pony Society

Winter quarters	License and regularly inspect, particularly accommodation.
Pet fairs	Need regulatory control.
Minimum Age	Raise.
Exotic and dangerous animals	Greater controls. Stricter rules on importation.
Tail docking	Ban.
Likely to cause	New law required and animal taken into care.
Increase Police powers	No.
Powers of arrest	Yes, extend.
Increase sentences	Yes, inadequate sentences or fines.
Codes of Recommendations	Yes.
Animal Sanctuaries	Yes.
Livery yards/stables	Yes.
Electric prods	Ban.
Bio-technology	It should be an offence.

Equestrian Support Services

Likely to cause	Yes, very important law protects animals against lack of care. E.g. tethering of horses, strays kept by unknowledgable people with few facilities.
Police powers	Extend to include 'likely to cause suffering'.
Increased sentences	Longer term custodial sentences when cruelty extreme or repetitive. Life long bans.
Codes of Recommendation	Yes in principle. Beware of creating a subjective code.
Licensing animal sanctuaries/ livery yards/stables	Yes, essential but also regular inspections from registered veterinary practises, ILPH field officers etc.

Farriers Registration Council

Farriers (Registration) Act 1975 not on the list	Welcomed as sensible.
Likely to cause	Yes, as difficult to prove an action has actually caused suffering. Beware when drafting of the burden of proof required.
Increase Police powers	Police have other priorities. Only interested when own investigators might be liable to physical assault.
Increased sentences	Illegal farriery is up to £1,000. Courts rarely use this. However, Farriers (Registration) Act 1975 has power to fine or imprison farriers and remove them from the Register.
Increase length of proceedings	Yes, in certain circumstances. However, if 'likely' comes in then necessity not so great.
Codes of Recommendation	Human Rights angle? Needs handling with care.
Licensing Animal Sanctuaries/livery yards/stables	Difficult to define as do the very small ones count?

Friends, Families and Travellers Advice & Information Unit

Should the rules on tethering be changed?	New legislation around horse tethering would greatly effect gypsies and travellers. No change is preferred.
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International League for the Protection of Horses

Model for legislation	Welfare of Farmed Animals (Regulations) 2000 setting down basic levels of care.
Welfare Code	Giving further detail.
Owner/horse identification	To ensure owner accountability at the 'bottom end' of the market. Microchips.
Inability to do more than advise until suffering occurred	i.e. Likely to cause... Protection through direction rather than deterrence. c.f. WoFA Regulations. With improvement notices.
Lack of minimum standards	Code of Recommendation needed. Also statutory advisory committee on equine welfare.
Straying	Legislation needs urgent review. Mandatory identification of all horses.
Carcass disposal	Costs have risen rapidly over last decade. Request centralised collection service.
Livery yards and welfare organisations	If running a company based around the care of horses should have good husbandry.
Licensing	Yes.
Penalties and bans	Currently a lack of clarity. Ownership bans can easily be circumvented. Legislation must be tightened relating to access not custody or ownership.
Powers of entry	Police and local authorities only. Entry should be unhindered.
Indiscriminate breeding	Results in unwanted and low monetary value horses. Should be borne in mind when considering new legislation and code.
Tethering	Major issue. Good practice should be in a Welfare Code.
Ragwort	Legislation exists for its removal, but merely when threatens agricultural land. Would like to see this broadened.
Draft Bill	Looking forward to the opportunity of commenting.

National Pony Society

Likely to cause...	Yes, welcome addition.
Powers of entry	Yes, but police only.
Codes of Recommendation	Yes, providing a period of consultation with industry was built in.
License animal sanctuaries	Yes.
License Livery Stable/Yards	Yes, including studs and producing yards.
Electric prods	Ban.
Bio-technology	Oppose anything that causes unnecessary suffering.

Pit Pony Sanctuary

Basic rights of working animals	<ul style="list-style-type: none"> • Not to be worked to death or injury. • Harnesses should be good quality and well fitted. • Access to clean pure water. • Suitable dry stable, bedding, water, good nourishing food and a safe turn out. • Basic record keeping, good husbandry experience. • Sufficient medicines etc. to be readily available. • Quarterly veterinary inspections. • Use of registered farriers only.
Animals in circuses	Difficult to prevent unnecessary suffering
Pet fairs	These are not conducive to animals being sold.
Minimum age	Raise to 16.
Pheasants	Can thrive if in wild and not shot.
Exotic/dangerous animals	Local authorities in Wales have a duty to licence.
Tail docking in horses	Ban.
Likely to cause	Yes.
Increasing powers	Yes. Might increase police seriousness in animal welfare.
Police powers	Yes. To same level as for children.
Powers of arrest	Yes.
Increased sentences	No.
Increasing time	Yes – 2 years.
Code of Recommendation	Yes.

Animal sanctuaries – licensing	Yes. Policing impartial, not in hands of larger charities.
Livery yards/stables	Yes.
Electric prods - ban?	Yes.
Biotechnology - danger in misuse?	Yes.

Shetland Pony Stud-Book Society

Concern over financial concerns	Due to FMD, introduction of passports for all equines. Need assurance that new legislation will not be superseded by further UK or EU rulings.
Circus animals	Regular inspection with clear guidelines.
License winter quarters	Certainly inspection but licensing may not be effective.
Tail docking	Yes, unless a good medical reason.
Electric prods ban	Yes.
Powers of entry	Remain with the police.
Increase length of proceedings	Yes, but 2 years seems a little excessive.
Codes of Recommendation	Yes, but what gain? Why not legislation?
Animal Sanctuaries	License and stronger initial controls (setting up procedures).
Livery yards/stables	Inspection, not necessarily licensing. Need to differentiate on size – do small ones count?
Biotechnology	Breeder to produce something defective on purpose should be an offence.

Society for the Welfare of Horses and Ponies

1960 Act	Straightforward and causes no problems.
1911 Act	Subjective interpretation e.g. ‘unnecessary suffering’.
Likely to cause	Yes.
Codes of recommendation	No great faith as codes can be ignored.
Licensing Livery yards	Yes, but further. Any establishment where horses are kept for profit. Also license welfare organisations.

South West Equine Protection

Identification of animal.	Yes, humane marking. Difficult in common land and areas of open moorland.
Likely to Cause	Yes, such as depasturing under negative conditions.
Breeding	Only when a likely market for animals. Uncontrolled breeding from inappropriate animals should be stopped.
Licensing Livery yards	Yes. Independently administered (local authorities) and free from overly bureaucratic procedures. Competent person should be responsible for site.
Licensing animal sanctuaries	Yes, but cost?

Spotted Horse and Pony Society

Animals in Circuses	Yes, license winter quarters.
Pet Fairs	Guidelines should be produced.
Minimum age	Keep the same (accompanied by an adult).
Captive Pheasants	No comment.
Keeping Exotic or dangerous animals	Further control please. Dangerous animals should not be pets, they need to be handled by experts.
Tail docking	Ban unless an animal has sustained an injury and requires surgery.
Likely to cause	Yes, although very difficult to define.
Police powers	Extend.
Powers of entry	Extend when people present for ‘sport’.
Increased sentences	Should be updated in line with changing face of animal abuse.
Increase proceedings time	Yes.
Codes of Recommendation	Yes.
Animal Sanctuaries	Inspection not license.
Livery yards/stables	Standard requirement of facilities.
Electric prods	Ban.
Bio-technology	Make this an offence.

Thoroughbred Breeders' Association

Limit comments to future developments.
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Thoroughbred Rehabilitation Centre

Likely to cause	Yes. Important to prosecute before suffering happens.
Licensing Livery yards	Yes. 'Encourage' the proprietor's sense of responsibility.
Licensing Animal Sanctuaries	Yes. Need to show a degree of knowledge, ability or genuineness.
Electric Prod/ electricity for training	Ban.

LOCAL AUTHORITY INTEREST

Some common themes

- The minimum age at which a child can buy a pet should be raised to 16 years.
- There should be a legal requirement that vendors of pets should be trained to a prescribed standard.
- Local authority officials need to be given greater powers to enable them to carry out their duties effectively.

Some quotes from the responses

- Non-domestic species are proliferating. The CIEH recommends that a duty of care must be understood by animal keepers, and concerns of a more general nature should be taken into account. Schuppli and Fraser (2000) have produced a paper which suggests categories of animals according to their appropriateness as a companion. There is a need for full understanding of security, safety and welfare as essential prerequisites of keeping certain animals.
Chartered Institute of Environmental Health
- Circus winter quarters should be licensed. Dangerous wild animals are in the hands of people who rely on their experience of historic relationships with animals without due regard for public safety.
Chartered Institute of Environmental Health
- The CIEH would support the introduction of the discretionary use of improvement notices in the maintenance of standards at licensed premises.
Chartered Institute of Environmental Health
- Where applications for a licence to sell, breed or keep animals are required, there should be a requirement to consult with the local authority prior to submission of an application.
Chartered Institute of Environmental Health
- Clarity of responsibility is needed in respect of abandoned animals. Local authorities are finding that they are receiving increasing numbers of incidents of abandoned animals.
Local Authorities Co-ordinators of Regulatory Services
- Focus should be given to clarifying the roles and responsibilities of the various agencies currently involved in animal welfare matters.
Local Authorities Co-ordination of Regulatory Services

LOCAL AUTHORITY INTEREST

Chartered Institute of Environmental Health (CIEH)

Organisation	Professional and educational body dedicated to promotion of environmental health and to encouraging highest possible standards in training and work of Environmental Health Officers attached to local authorities.
DEFRA initiative	Full support. Needs updated, fragmented, inconsistent enforcement levels, Environmental Health Officers suffer ever reducing resources.
Animal welfare in new laws	No duty of care placed on owners/keepers. No training for persons who work with animals. Lack of clarity about who enforces what. Lack of scientific evidence for appropriate temperature, space, ventilation, etc - important to establish this in any legislation. Current law limits what licence conditions may be applied - welfare not a consideration but are used as arguments for not complying with conditions when seen as gainful.
Breeding legislation	Controls exist but more for showing (commercial interests). Need introduction of DNA testing. Recommend licensing of <u>all</u> breeding operations. Authenticated breeding bodies could authorise to set standards. Recommend a redefinition of "breeder" and "business". The Breeding and Sale of Dogs Act 1999 is more difficult to enforce because of the increase in the upper limit in the number of litters produced. Licence conditions to include scoring for hereditary conditions. Recommend that Council of Europe Convention on Protection of Pet Animals relating to breeding standards should be applied.
Non-domestic species	Recommend a duty of care on keepers. Schuppli and Fraser (2000) produced paper which suggests categories of animal according to their appropriateness as a companion (attached to submission) weblink page: www.agsci.ubc.ca/animalwelfare/projects/exotics.html Need for full understanding of security, safety and welfare. Too easy to obtain such animals. Spurs other trades, such as supplying foodstuffs even slaughter of other animals for food. Difficult to licence and if refused no control over slaughter. Recommend review of humane methods of slaughter of animals.
Pet fairs	Greater clarity needed to deal with these shows. "Member only" events are seen as a way round the need for a licence. Events are an opportunity for selling illegally imported and home bred species. Argument that fairs are not needed if fully licensed pet shop system exists. Controls on one day fairs are by nature difficult. Recommend tighter definition of "pedigree animal". Pedigree certificates are issued in Japan for Koi. However, it is considered that Koi fairs are markets and are thereby illegal. CIEH supports local authorities policy that such fairs would only subject to enforcement if there were welfare concerns - policy in line with Enforcement Concordat. CIEH issued advice on one day pet fairs.
Pet Animals Act 1951	Recommend that pets should not be kept on premises where sales are being made. If challenged, pet shop owner can claim that endangered species is not for sale. Recommend that sales of invertebrates should also be licensed. Recommend clarification as to whether stall within a shopping centre is a shop. Guidance should be issued to all local authorities when new legislation is introduced. Recommend minimum age at which a person can buy pets be raised to 16 years. Recommend legal requirement for training vendors to a prescribed standard. Recommend shorter appeal period. Recommend greater powers of entry for suspected pet shops operating without licence. Recommend greater control of non-indigenous species (spurious arguments about human rights must be countered). Case law indicates that more than six animals held in one place requires planning permission CAWC currently researching this matter.
Commercial premises	Increase powers of entry and greater consistency of enforcement. Domestic properties should NOT be excluded from power of entry.
Enforcement	Local authority officers should have power to ask the name and address of offender. Also there should be an offence of obstruction.
Other legislation	Would like to see: Guard Dogs Act 1975, Animal Health Act 1981, Wildlife & Countryside Act 1981, Animals Act 1971, Cinematograph Films (Animals) Act 1937, Dogs Acts 1871 and 1906 together with regulations and orders included in the review in order to provide clarity of responsibility.

Council of Europe Convention on the Protection of Pet Animals	Recommend signing and ratifying to further animal welfare.
Protection of Animals Act 1911 and amendments	Recommend that it cover all animals. Clearer definitions to remove doubt. Courts have lower level of interpretation of cruelty - only "actual" rather than "passive". Should include "intention to commit cruelty. Recommend codes of recommendation. Recommend strengthening powers of entry, search arrest and seizure. Sentences require regular review.
Performing Animals (Regulation) Act 1925	Recommend a separate group if inspectors for circus, dangerous wild animals and other performing animals (as recommended by the joint report of BVA and Animal Welfare Foundation "Welfare of Non-Domestic Animals in Captivity" (Aug 1991)). Recommend that circus winter quarters be licensed. Recommend logbooks together with the possible extension of the Dangerous Wild Animals Act 1976 to circuses.
Cockfighting Act 1952	Recommend that it be an arrestable offence to attend such an event.
Abandonment of Animals Act 1960	Recommend clearer definitions of "abandonment", "stray" and "animal".
Animal Boarding Establishments Act 1963	Recommend that Codes of Recommendation should be mandatory (some local authorities don't apply CIEH guidelines). Recommend that further clarification be given in respect of greyhound kennels.
Dog-minding controls	Increase in this activity (e.g. "dog-sitting" in keeper's home or in sitter's home; dog walking and grooming parlours) with no licensing requirements.
Licensing of animal sanctuaries	Yes. Some sanctuaries claim to be charities in order to avoid being licensed.
Licensing of livery yards	Yes.
Protection Against Cruel Tethering Act 1988	Recommend rights of seizure be increased. Recommend that horses be identified to assist controlling owners who wrongly tether or abandon them.
Dangerous Wild Animals Act 1976	Recommend keepers be required to demonstrate correct procedures for importation/breeding of animal has been followed. Recommend that local authorities involved in case should ensure that authorised vet is competent to deal with DWA animals. Helpful if BVA published list of suitable vets (as they do for horses).
Dogs Act 1871	Recommend transfer of ownership between offence and hearing should be stopped. Recommend clarification of control and destruction orders; control orders used as first step or introduce confiscation order (applying to household rather than individual). Ability to control dogs left unsupervised amongst children playing in groups remains significant in preventing accidents.
Town Police Clauses Act 1847	Recommend that powers apply everywhere. Recommend that it be amended to include a responsibility of the keeper/owner to prevent attacks on other animals as well as urging to attack.
Animals Act 1971	Three High Court judges described it as too complex. Needs reviewing.
Dogs Act 1906	Very valuable law if it can't be updated it should remain on statute book.
Guard Dogs Act 1975	Recommend that Act be included in review. No definition of "handler". Other sections should be brought into force. Should be a requirement for training before setting up as operator. Possible conflict with Dangerous Dogs Act 1991.
Animal welfare charters	Example of good practice. As part of the process of providing guidance to local authorities a draft charter (possibly based on existing practice) should be available for local authority consideration.
General enforcement	Recommend introduction of "improvement notices" in maintenance of licensed premises. Recommend that applicants for licences to sell, breed or keep animals should be required to discuss with the local authority prior to applying - including plans, etc (premises are often set up before applying). Recommend introduction of "general duty" to treat animals reasonably, backed by approved codes of recommendation and guidance which can be amended without the need for primary legislation.

Local Authorities Co-ordinators of Regulatory Services (LACORS)

Enforcement/ responsibilities	Clarification of roles needed between various agencies: DEFRA, Environmental Health, Trading Standards and others (e.g. RSPCA).
Animals kept for business, inc. entertainment	All should be licensed.
Farm and domestic animals	Legislation for each should be separate. Specific legislation for non-farmed, captive and domestic animals along the lines of the Welfare of Livestock Regulations 2000.
Protection of Animals Act 1911; Agriculture (Miscellaneous Provisions) Act 1968; Welfare of Farmed Animals Regulations 2000	Should be consolidated.
Welfare of domestic pets	Should remain the responsibility of other organisations (e.g. RSPCA).
Abandoned animals	Clarity of responsibility is needed. Incidents of abandonment on increase.
Local authority powers	Recommend new powers: Seize animals Some form of registration or licence for all keepers Enhanced power of entry
Time limit for case brought before court	1 year after offence discovered.
Powers of entry	Consideration to be given to extension of powers to ensure compliance of legislation.
Slaughter without prior stunning	Should be banned.
Offence of likely to cause unnecessary suffering?	Yes.
Electric goads	Should be banned.
Performing Animals (Regulation) Act 1925	Should encompass all animal welfare issues, not just registration of exhibitors and trainers. Registration renewable every 5 years. Trainers/exhibitors required to demonstrate competencies of relevant species. Licensing of circus winter quarters. Each animal identifiably tagged.
Pet shops/keepers of exotic or dangerous animals as pets	Should demonstrate competencies of relevant species by independent assessor.
Minimum age to buy pets	16 years.

THE NON-FARMED COMMERCIAL INTEREST (including electronic aids)

Some common themes

- **There is support from the commercial sector for the continued use of electronic aids, particularly in the handling of dangerous wild animals. Increase licensing to take in groups such as pet sitters.**

Some quotes from the responses

- **Comments are invited on the use of biotechnology in animal breeding, specifically on whether it should be an offence for breeders to produce an animal that will not be used for scientific research or medical purposes but that is likely to be genetically defective in some way.**

The BIA believes that it would be extremely difficult and probably unwise to attempt to incorporate this in legislation. The main problem would be the difficulty of defining 'genetically defective' in any meaningful way that would not include a very large number of animals which are currently bred for a variety of purposes in a way that is considered to be perfectly acceptable.

The BioIndustry Association

- **Currently and like many zoos here and abroad, particularly in the US our elephant keepers carry, and will use if necessary, cattle prod. It is regarded by us as an extremely important standby safety tool, to be used by the keeper in the event of danger to either themselves, the public or even another elephant.**

Blackpool Zoo

- **Electronic training products are not short cuts to solving pet behaviour or management problems, but a valuable tool to help in so doing.**

Radio Systems Corporation

- **Within the Safari Park context we believe electronic prods to be an ethical and practical tool which enables us to manage our animals safely with a net welfare benefit for the animals themselves and increase of safety for staff.**

Woburn Safari Park

- **Apart from the unacceptable pain inflicted on individual animals, electronic shock collars give a message to people that painful aversion therapy is an acceptable way to treat animals and resolve the problems we cause in them. Public response to police forces using shock collars, and the subsequent discontinuation of their use, demonstrates that general public opinion does not consider their use to be acceptable.**

Animals in Mind

THE NON-FARMED COMMERCIAL INTEREST (including electronic aids)

Animals in Mind

Electric shock collars, Perimeter or invisible fence systems, Cattle prods.	<p>Use of such collars is cruel and unnecessary. Documented evidence relating to burns and ulcerated wounds that result from using a shock collar. Electric cattle fences are a different item from collars, prods and invisible perimeter fences. Animals have a choice about touching cattle fences and moving away - they are also a physical barrier.</p> <p>Electric shock collars are mostly used when owners consider there is a behavioural problem. Such problems can be resolved without the need for electric shock collars. As dogs can't determine where the stimulus emanated it is very easy to change behaviour adversely. It may reinforce an unwanted behaviour or cause another. The dog may also wrongly associate the pain with a person or object. Use of the collars give a message to people that painful therapy is an acceptable way to treat animals and resolve the problems we cause them.</p> <p>Perimeter or invisible fence systems should also be banned. As well as pain they can leave the dogs vulnerable to other problems including neglect, lack of exercise and a relatively easy escape onto roads, etc. Dogs can escape the perimeter before being able to stop even after receiving the shock; they then can't get back. Possibility of associating shocks with passers by. Dogs may be afraid to go outside. To be effective the collars need contact with the skin. Mostly achieved by use of metal spikes which can cause injury to dog.</p> <p>Cattle prods are unnecessary. Generally used on herd animals. Could invoke a panic response (e.g. stampede) rather than desired submission. Herdsmen have achieved control of herd animals for centuries without the need for shock devices. Misuse of prods is well documented, especially in zoos and circuses.</p>
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AstraZeneca

Animals used for scientific procedures	Review doesn't include Animals (Scientific Procedures) Act 1986 Act but should be aware of peripheral effects any changes might have.
Importation of animals	Recommend amend laws prohibiting importation of frozen rodent embryos. Currently, live animals are imported causing distress and health risks.

BioIndustry Association (BIA)

Biotechnology	<p>Difficult and unwise to attempt to incorporate this in legislation. Difficulty of defining "genetically defective" in any meaningful way that would not include a very large number of animals which are currently bred for a variety of purposes in a way that is considered to be acceptable. If broad definition is applied, it would include many pedigree lines bred as pets, for racing and possibly even agriculture. If more restricted definition is applied it is difficult to see where or how to draw the line in defining what is regarded as "defective".</p> <p>Furthermore, there may be changes in the genome which become apparent only in future generations and in contexts where it is impossible to predict. Natural genetic mutations occur and some will produce animals considered defective. Some genetic mutations, which might be defective, can also have important economic or other benefits (e.g. double-muscling of the Belgian Blue. If it were an offence to breed such animals it would make it impossible to investigate many new mutations to see if they have desirable or advantageous characteristics.</p> <p>Important to remember that our society has been genetically modifying animals by selecting and breeding natural mutants for many thousands of years.</p>
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Blackpool Zoo

Electronic prods	Electronic prod is regarded by us as an extremely important standby safety tool, to be used by the keeper in the event of danger to either themselves, the public or another elephant. Free contact elephant management is dangerous and difficult - three keepers killed in last two years. UK Federation of Zoos producing guidelines for elephant management and widely accepted that electronic prods play an important role in keeper safety. Conducted full risk assessment on our elephant programme which have been independently inspected by Zoo Inspectors, local health and safety officials and the Health & Safety Executive. A ban on electronic prods would have a severe impact on keeper safety in the UK and also have an impact on elephant management abroad.
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Direct Line

The company	Insurance company that has provided pet insurance since 1997. Sponsored the Pet Advisory Committee's conference held on 30 April 2002 at the QEII Conference Centre.
Current legislation	Piecemeal. The Pet Animals Act 1951 (as amended 1983) is inadequate. People are also concerned about animal boarding establishments. Support consolidating and modernising legislation.
Specific concerns	In February 2002 DL undertook survey among 1001 cat and dog owners on what they wanted to see reviewed: 90% wanted to see penalties increased; 77% reducing the number of stray dogs and cats; 76% the regulations for the selling of pets; 72% the regulations for kennels and catteries; 72% increasing the minimum age at which pets can be bought; dog fouling 79%; restrictions on air guns 80%; theft penalties 75%.
Standards in kennels and catteries	Legislation must be reviewed. Current system inconsistent with local authorities applying different standards. Inspection is a low priority for some local authorities.
Pet Identification	Inconsistencies between local authorities as to how they deal with strays. Strong support for enforced identification schemes. Support the idea of voluntary schemes (e.g. PetLog, est. in 1995 encompassing all forms of identification). DL has taken part in the Dog Identification Group's (DIG) discussions to try to progress DIG's recommendation that the Govt increase dog and cat identification but little progress to date! Government should consider mandatory identification of cats and dogs.
Pet theft	Steady rise in pet thefts in recent years. Regarded by authorities as similar to theft of television, etc. Maximum penalty for such offence £5,000 and/or 6 months' imprisonment. Magistrate's courts consider any case on: value of property, level organisation involved in theft or on impulse; and whether vulnerable victim - what is stolen is immaterial. Recommend increased maximum penalties for those convicted of stealing pets.
Conclusion	Welcome the decision to review animal welfare legislation. Like to see Government initiatives aimed at increasing the number of pets insured.

Dobson, Ms Jennifer, BSc (Hons) Applied Animal Science

Trade	Animal Behaviour Consultant and Trainer, since 1980.
Electronic spray collars	Limited success. In 20 cases where it was tried it only worked in 3 cases. In all cases the unwanted behaviour responded positively to conventional behaviour training. Own experience: <ul style="list-style-type: none"> • Spray does not work well in situations where dog is engaged in behaviour which it considers highly rewarding; • dogs respond better to spray if already preconditioned to shock collars; • many owners use remote control products because they want to control dogs off lead (problem when dog goes out of reach of device).
Electronic collars and fencing	Invisible fencing - perimeter marked out with flags. Dog receives warning (clicking noise) prior to stimulus. Problems: dog can become averse to similar sounds; dog can escape perimeter, may not return.
Remote control electronic shock collars	Experience: effective and reliable when alternative methods have failed; however, totally unsuitable for unsupervised use by most pet owners. Products vary and should only be obtained from a reputable company and for a specific purpose. The one personally used produces a level of shock similar to static that can be received from a car door (test on own hand before each use).
Summary	Only use electronic devices when all else has failed. Only used such methods in 1% of clients' dogs. Individual cases involving electronic devices are listed in submission.

Focus

Company	Chain of Do-It-Yourself stores (some stores sell pets)
Selling of pet animals	<p>Endorse Pet Animals Act 1951 (as amended 1983). Qualifications are not always available and hobbyists who supply the retailing trade have learnt more information from their animals than is available in books and magazines. Considerable information available on internet by organisations whose members keep the animals.</p> <p>Focus stopped selling reptiles 2 years ago due to pressure from animal activists.</p> <p>Industry has become more educated and reliable but needs to keep pace with advances in scientific as well as academic world. Pet superstores and the internet/publications has promoted more responsible ownership in animals throughout the 1990's.</p> <p>Minimum age at which to buy pets should be raised to 16 years.</p> <p>Superstores have adopted model standards introduced by the CIEH and endorsed by the BVA and Pet Care Trust although not all pet shops have accepted them. Most Environmental Health Officers are unaware of these basic standards which should be applied to ensure trade is properly regulated and has basic broad standards for all pet shops.</p> <p>Future should be a more controlled and quality assured industry taking products services and the welfare of animals into the 21st century. Pet superstores are the key, offering standards and services (e.g. grooming and vets) expected by all owners.</p> <p>Refusal to sell pets does offend.</p> <p>Captive-bred animals supply trade which has reduced the need for wild stock to be sold.</p>

Humane Society of the United States of America (Research and Educational Outreach)

Electric shock collars	<p>Aware of concern. Met with many trainers, consumers and manufacturers to discuss concerns. We recognise that older versions of electronic shock collars were often unreliable but we consider that new technology employed by responsible manufacturers has led to safe and effective products. There is a wide variety of products available with an equally wide range of users. Any product including a simple leash and collar can be ineffective. Electronic training aids that are improperly designed, maintained and fitted, adjusted or employed may also present risks, but their proper use in conjunction with reward based basic obedience training has demonstrated benefits to many thousands of dogs and their owners.</p>
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National Association of Registered Petsitters

Animal Boarding Establishments Act 1963	<p>4,000 members offer a variety of pet care services, including: house and pet sitting; dog boarding; daily pet care; dog walking and many other related services.</p> <p>The 1963 Act is outdated, inadequate and unfair to our members who offer "one to one" dog boarding. 1963 Act legislated for commercial boarding establishments but it also treats private homes in the same category. The main criteria is that if money is paid for boarding, then the establishment should be licensed.</p> <p>Under current legislation pet sitters' homes should be licensed, as if they are a boarding establishment. Local authority annual licensing fees can range from £55 to £300. Some are refused licences, as their homes are not commercial boarding establishments.</p> <p>We ensure that people who board dogs in their private homes do so in a responsible caring and correct manner. Petsitters only board one dog at a time.</p> <p>Only 30% of dog owners use boarding establishments so we offer a vital and popular service. Social and economical considerations: many members are pensioners, single parents, members of low-income families, etc - vital income.</p> <p>Recommend amending legislation to enable pet sitters to be licensed, rather than exempt or illegal, in the same way as boarding establishments are licensed.</p>
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Pet Care Trust

Organisation	Represent the pet trade industry.
Pet shops	The Pet Care Charter (PCC) already forbids pet animals to be sold to anyone aged under 16 years. Raising age limit is unnecessary.
Keeping exotic/dangerous animals	Selling of such animals already controlled and being reviewed (DWAA) so any further consideration to review is unnecessary. Definition of "exotic". Both PCC and local authority guidelines obligate our members to educate customers about the animals. Unusual species of today could be common ones of tomorrow. Pet animals do not become extinct.
Likely to cause unnecessary suffering	Law should prevent unnecessary suffering. However, attention should be paid to Human Rights Act 1998.
Increase powers available to police	Current powers are adequate. Human Rights Act 1998 should be considered.
Increase time allowed for proceedings to be brought before a court	No extension to current 6 months time limit - evidence that this is misused.
Codes of Recommendation	PCC and local authority guidelines provide high standards of welfare.
Pet fairs	Current regulation is unclear. Recommend that such events should comply with standards in PCC and local authority guidelines. Similar events take place in Germany with vet in attendance.
Auctions	Cannot be controlled under Pet Animals Act 1951 and should either be regulated separately or preferably prevented altogether. However, hobbyists should be allowed to sell excess stock.
Animal sanctuaries	Should be licensed. Currently no requirement to demonstrate competence.
Tail docking	Tail docking by a vet is justified as it avoids possible tail damage and/or the needs of hygiene.
Mis-use of biotechnology	Legislation should not constrain welfare benefits that may be developed through future application of biotechnology.

Radio Systems

Company	Manufacture electronic training aids for training/controlling pets. Many products approved by respectable organisations: American Society for the Protection of Cruelty to Animals (ASPCA), The Humane Society of the United States (The HSUS - see their earlier submission above).
General	Review should not be about the merits of using a particular training method (e.g. positive reward as promulgated by certain sects of the dog-training world). It should be accepted that negative methods are also necessary in some cases (e.g. ignoring the pet or shouting "No"). Owner has duty of care. Legislation should focus on abuser of pets and a thoughtful researched definition of abuse be determined which may include some emphasis on the idea of "intent". Then need to see where current legislation falls short of providing protection. Recommended that legislation relating to equipment such as that manufactured by RS be limited to setting safety standards for training products and should not mandate a particular training philosophy.
Definition of electronic training	Equipment designed to either contain an animal in a safe area, exclude one from a forbidden area or to reduce or eliminate problem behaviour. Products use a variety of stimulation methods (e.g. sound, vibration, spray and static correction). Stimulus can be a radio call (e.g. similar to paging device) that uses a vibration or a burst of spray when activated by a bark.
Electronic methods:	
Containment (wired)	Pet (wearing a receiver collar) will receive a warning vibration if it goes beyond a perimeter along which an underground wire is laid connected to a transmitter. If pet continues it will receive a stimulus, which varies according to product and manufacturer.
Containment (wireless)	Similar to wired but transmitter envelopes the property in a radio signal. As pet begins to wander so the radio signal fades and first receives a warning beep then a stimulus.
Bark control	Emit a stimulus to discourage excessive barking. Most provide a warning before stimulus. Advantage is consistency in stimulus and association of the stimulus with the behaviour rather than with the human trainer. Other methods that rely on the trainer tend to be ineffective when the trainer is removed.
Remote training	Operated by hand held transmitter which activates the collar on the animal. Variety of stimuli used (e.g. static, spray, vibration or sound or combination of these).
Dogs are situational learners	They associate the stimulus with all components of the situation. With trainer present they will only learn not to do something when that trainer is present.

Avoiding a particular area or location	Mats emit static or audio stimulus as animal treads on it.
Pet management	Electronically controlled doors. Pet will only gain entry through the correct door if it is wearing a collar.
Level of stimuli	Details of the levels of stimuli are included in their detailed submission but RS consider that these are low and do not cause the animal pain. They claim that the ASPCA and The HSUS formerly approve of their products. The American Behaviour Training Associates (ABTA) the largest pet training company in the USA fully endorses and recommends the PetSafe product line. Claimed that the CVO of RSPCA owns a PetSafe Radio Fence.

Rolf C Hagan (UK) Ltd

Pet Shops	Pet Care Charter (PCC) already forbids members to sell pet animals to people under 16 years of age. Therefore unnecessary to raise minimum age limit
Keeping exotic or dangerous animals	Legislation on selling such animals already under review (DWAA). Definition of "exotic". PCC and local authority guidelines obligate members to educate customers.
Likely to cause unnecessary suffering	Law should prevent unnecessary suffering. However, attention should be paid to Human Rights Act 1998.
Increase powers available to police	Current powers are adequate. Human Rights Act 1998 should be considered.
Increase time allowed for proceedings to be brought before a court	No extension to current 6 months time limit - evidence that this is misused.
Codes of Recommendation	PCC and local authority guidelines provide high standards of welfare. Definition of "exotic".
Pet fairs	Current regulation is unclear. Recommend that such events should comply with standards in PCC and local authority guidelines.
Animal sanctuaries	Should be licensed.
Mis-use of biotechnology	Legislation should not constrain welfare benefits that may be developed through biotechnology.

Scammonden Boarding Kennels and Cattery

Inspections	<p>The following organisations should be licensed:</p> <ul style="list-style-type: none"> Pet sitters Pet walkers Pet foster carers Pet shops with boarding facilities 'only for customers.' Veterinary practices with boarding facilities 'only for clients.' Bird gardens which board parrots Livery yards Animal sanctuaries. <p>All inspectors should be employed by either central or local government.</p>
Police powers and sentencing	<p>There should be an increase in penalties for</p> <ul style="list-style-type: none"> Those present at an animal fight Capturing foxes and badgers for baiting purposes

Woburn Safari Park

Electronic prods	Opposed to ban. Prods used for movement of animals and protection of staff. Consider that prods are an ethical and practical tool which enables management of the animals safely with a net welfare benefit for the animals. Some control on the use of prods should be introduced. Who/how/when they are used.
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THE PARLIAMENTARY INTEREST

Associate Parliamentary Group for Animal Welfare

Key point:

- **Any new legislation should ensure that detail of offences is general enough to prevent the legislation from becoming out of date.**

All Party Group for Animal Welfare (National Assembly for Wales)

Key point:

- **Making Codes of Recommendation is an essential part of any new legislation, as this would enable government to monitor the finer details of a species' care and welfare.**

THE PARLIAMENTARY INTEREST

All Party Group for Animal Welfare (National Assembly for Wales)

Animals in circuses	Consideration to be given to a ban on all animals in circuses. Failing that then tighter legislation and regulation of circus winter quarters. Recommend a ban on exotic animals in circuses.
Pet fairs	Regulation needed. Particular concern over number and condition of equines at these fairs.
Pet shops	Animals should be acquired from places they were born or reputable rescue centres and not sold from pet shops. Recommend minimum age is raised to 16 years, all animals sold with comprehensive fact sheet. Concern that some pet shops obtain puppies from unlicensed breeders "puppy farms". More traceability and improvement in regulatory controls.
Welfare of captive pheasants	Recommend enforceable codes of practice for all captive animals to ensure safety and welfare.
Keeping of exotic or dangerous animals	Opposed to the keeping of certain animals. Like to see Dangerous Wild Animals Act 1976 (DWA) list comprehensively reviewed. Recommend that pet shops should have DWA licence, if necessary and only be able to sell those animals to persons who already possess a DWA for the particular animal they are purchasing. Recommend an end to exotic pet trade fairs.
Tail docking	Recommend a ban on all cosmetic tail docking.
Likely to cause unnecessary suffering	Recommend such an offence. Not qualified to comment on legal definition. The Veterinary service needs reform to provide "independent" vets, who may be more able, experienced and trained in "supporting" in cases of cruelty.
Increase powers available to police when investigating allegations of cruelty	Perhaps need to educate police so more likely to exercise powers they currently possess. Consider that police do not act on allegations of cruelty in areas like greyhound racing and perhaps not equipped to exercise them or unaware they have them.
Powers of arrest	Recommend that police should have powers to arrest spectators to dogfights.
Increased sentences	Recommend increased maximum penalties.
Increase time allowed for proceedings to be brought before a court	Recommend an increase to 2 years.
Codes of recommendation	Recommend that the Secretary of State should have such a power.
Licensing of animal sanctuaries	Recommend that they be licensed. However, the level of the licensing fee should reflect the size and nature of their work and not inhibit their operations.
Licensing of livery yards	Recommend they be properly licensed.
Electronic prods for training	Recommend they be banned.
Biotechnology	Legislation needed to protect welfare of animals. Accept that Govt allows animals to be used in research but every effort should be made to reduce this number.
Microchipping	Recommend statutory microchipping scheme for dogs. Properly run scheme could improve welfare.

Associate Parliamentary Group for Animal Welfare

Protection of Animals Act 1911	Needs updating. Any new legislation should include/ consolidate the offences defined by the 1911 Act, but ensure that detail of offences is general enough to prevent the legislation from becoming out of date.
"Unnecessary suffering"	No formal policy on this matter. Difficult to prove. Mental or psychological suffering is often not taken into account. Therefore judicial hierarchy often relies on its own personal interpretation, which can be quite narrow, or perceptions of what can be deemed as "unnecessary suffering". Recommend widening of definition to include psychological aspects as this is an increasingly important area of concern for many captive animals.
Increasing powers available to police when investigating allegations	Consider animal welfare is important and should be protected and improved at all times. Cases of cruelty seem to be on the increase and group wants to help police prevent crimes before they occur. Recommend further powers for police and keen to see proposals in this area before commenting on this issue.
Powers of arrest	Current powers should be continued but support further powers if it helps detection and conviction.
Increased sentences	Should be made tougher as currently they are not acting as a deterrent. Recommend longer sentences.
Ban on convicted persons keeping animals	Loophole of disqualified persons still having access to other animals. Recommend the disqualification order should not just apply to possession but also to access.
Animals in circuses	Do not consider that circuses can provide appropriate environments for animals, in particular wild animals. Not educational only for entertainment. Urge the Govt to introduce tighter controls over type of animals that can appear in circuses. At very least the Zoo Licensing Act 1981 should cover circus winter quarters to ensure some regulation. Recommend that animals should not be taken out their natural environment for the purposes of human entertainment.
Pet Animals Act 1951	Recommend extension of the regulation of pet shops to control what species they can sell. Also raise minimum age at which someone can buy pets.
Cockfighting Act 1952	Offence of participating in such an event is serious. Recommend that the punishment should reflect this.
Abandonment of Animals Act 1960	Agree that this Act be consolidated into any new legislation.
Animal Boarding Establishments Act 1963	Recommend that these establishments be regulated as before.
Riding Establishments Act 1964 & 1970	Recommend that these establishments be regulated as before.
Dog breeding legislation	Recommend that these establishments be regulated as before. However, as more species are no bred for the pet trade, other species should be included in any new breeding legislation.
Protection Against Cruel Tethering Act 1988	No policy but recognise that tethering can cause injury. Recommend ban on tethering of all animals or failing this, a code of conduct, dependent on strength and enforceability.
Captive pheasants	Recommend legislation to ban cruel techniques (e.g. pinioning, brailing and beak trimming).

Keeping of exotic or dangerous animals as pets	<p>Concern about exotics sold via pet shops, dealers and over internet. More popular as pets and many not suitable. Owner very often ignorant about how to look after them.</p> <p>Recommend that owners and dealers of dangerous wild animals be registered to allow monitoring.</p> <p>Unsure whether a ban on keeping of exotic animals would be effective in reducing poor welfare is unclear. Recommend much tougher regulation of exotic pet trade (inc. register and codes of practice).</p> <p>Recommend that those species that cannot be kept humanely in most homes should be banned from private ownership.</p>
Tail docking	All animals: if there is a genuine health/welfare reason for docking then this should only be carried out by a vet (with anaesthetic).
Codes of Recommendation	Agree in principle. However, must be enforceable. Only practical to apply to specific areas (e.g. tethering).
Licensing of animal sanctuaries	<p>Chairman of Group sponsored Bill on this. Often neglect caused unintentionally or otherwise. Anomaly that boarding establishments are licensed and sanctuaries are not. Accurate definition of "sanctuary" will need to be achieved.</p> <p>Recommend that small sanctuaries should be omitted from regulation as they could find the costs too much. However, they should register with their local authorities who should retain inspection rights.</p>
Electronic prods/ goads for training/moving livestock/ entertainment	<p>Cruel and unnecessary. More humane methods exist. If people need them to move large animals, then question of whether they are suitable for a captive environment.</p> <p>Recommend that they be banned.</p>
Electronic shock collars	Recommend that they be banned.
Misuse of biotechnology in animal breeding	<p>Concern about possible cloning on long-term health/welfare. Every caution should be taken. Only for used for genuine medical reasons. Recommend a ban on such procedures other than therapeutic reasons. Welfare of animal should be put first.</p> <p>Enforceable codes of practice to ensure that animals can be monitored throughout.</p>
Use of snares/traps	<p>Humane traps can be set to allow removal of animal (providing they are checked regularly). Recommend that all traps that do not catch prey alive without injuring should be banned. Recommend all snares should be banned.</p>

THE POLICE INTEREST

Some common themes

- The present law is a mess.
- Modern powers of entry, search, seizure and arrest are essential, irrespective of who is the enforcing agency.

Some quotes from the responses

- The existing legislation is outmoded, complicated and ineffective. It fails to deal with our modern society in any meaningful fashion. The police strongly welcome the proposal to introduce an Animal Welfare Bill, and we would suggest that it should attract a fairly high priority from government. There is a need for new legislation, and it is an urgent one.

Association of Chief Police Officers

- Any new legislation therefore needs to set out, clearly and carefully, who is to enforce it. Clearly enforcement powers will be necessary - but who is to exercise them? Local authorities do not have good record as enforcement agencies (as the recent foot and mouth epidemic demonstrated, and the same picture emerges from the Dangerous Wild Animals Act review). The position of charities like the RSPCA is also questionable. Is it right to have a charity acting as the main enforcement agency for animal welfare issues? The only serious alternative is the police. Proper enforcement of new legislation, if done by the police, would require additional resources.

In any event, we in the police do not believe that animal welfare (in the sense of welfare, regulation and cruelty) is a matter for the police service in England and Wales in the 21st century. This is not, unless parliament instructs otherwise, our role. We would actively seek to avoid picking up responsibility for this considerable task, even if new resources were made available, as a distraction from our core business.

Association of Chief Police Officers

- Animal cruelty should have an unconditional power of arrest and be deemed an 'arrestable offence.'

Police Federation

THE POLICE INTEREST

Association of Chief Police Officers (R. Brunstrom, Chief Constable, North Wales Police)

Should the law be revised?	Yes. The existing legislation is outmoded, complicated and ineffective. The police strongly welcome the proposal to introduce an Animal Welfare Bill.
Should the 'Five Freedoms' be incorporated into an Animal Welfare Act	Yes. There should be a statutory duty of care in relation to these five freedoms.
The police and law enforcement	Animal welfare (excluding cruelty offences) and licensing issues should not be a matter for the police service. It is arguable that the police should continue to be involved where there is deliberate cruelty against animals. If the police were to retain a remit to deal with cruelty offences, more powers will be needed than those in current legislation. More resources would also be needed.
Power of entry and search onto land and premises	Should be brought in to line with PACE.
Powers of arrest for cruelty offences	Should be broader and in line with PACE (this has already been done in the CROW Act).
Powers to stop and search	Should be in line with PACE.
The time allowed for proceedings to commence	Should be increased to 2 years in line with the CROW Act.

Police Federation of England and Wales

Should the law be consolidated and revised?	Yes.
Animal	There needs to be a clear definition of animal.
Captive	The definition of 'captive' should include animals reduced to 'temporary captivity.' This would eliminate cruel acts that are currently not covered. There also needs to be legislation similar to the Wild Mammals (Protection) Act 1996 to protect non-mammalian animals.
Cruelty	Include psychological suffering in the definition.
Power of Arrest	There should be an unconditional power of arrest and cruelty deemed an 'arrestable' offence.
Power of Entry	There should be a power of entry without warrant where there is suspicion that an animal is suffering. A warrant should also be available by application to a magistrate, where it is suspected there may be evidence of animal cruelty
Keeping of exotic and dangerous pets	Should be subject to greater controls.
Likely to cause 'unnecessary suffering'	A new offence should be introduced. More and more exotic species are kept alive in international shops and supermarkets in the most appalling conditions.
Sentencing	There should be greater powers.
Disqualification	Should be a statutory requirement of conviction for cruelty rather than an option.
Animal Sanctuaries	Should be licensed.

THE PROFESSIONAL VETERINARIAN ASSOCIATIONS

Some common themes

- **Our animal welfare laws should be more pro-active in the prevention of suffering.**
- **An Animal Welfare Act that allows Codes of Recommendation to be made is a welcome development.**
- **A positive approach to the suggestion that there should be a ban placed on tail docking.**

Some quotes from the responses

The Royal College of Veterinary Surgeons welcomes the proposal to update and consolidate the legislation on animal welfare. The underlying law in the Protection of Animals Act needs to be brought up to date so that it promotes good welfare rather than simply seeking to avoid cruelty.

RCVS

The BVA would foresee an Animal Welfare Act as providing the protection necessary to prevent all sentient animals (including birds and fish), irrespective of their function, suffering from cruelty, unnecessary pain and distress and poor welfare conditions. This will only be achieved if there is a clear understanding of what exactly is meant by good welfare. A legal definition would be desirable but not easy to achieve.

British Veterinary Association

RCVS has for many years been firmly opposed to the docking of dogs' tails, at any age, except when it is required for therapeutic or truly prophylactic reasons. It is already unlawful for the operation to be undertaken by anyone other than a veterinary surgeon. There would be no objection to legislation to make it unlawful even for a veterinary surgeon to dock a dog's tail for cosmetic reasons, so long as it remained within the veterinary surgeon's discretion to carry out the operation when it was clinically justified. In exercising that discretion veterinary surgeons would be subject, as now, to the disciplinary jurisdiction of RCVS.

RCVS

It is BEVA's opinion that new legislation needs to be introduced which controls livery yards, horse rescue establishments and horse trekking centres. The licensing of livery yards together with the new horse passport regulations would form an essential step towards an improved equine disease surveillance.

British Equine Veterinary Association

THE PROFESSIONAL VETERINARIAN ASSOCIATIONS

British Equine Veterinary Association (BEVA)

Should Livery Yards, trekking Centres and animal sanctuaries be licensed?	<p>Yes. Boarding establishments for cats and dogs and riding establishments are subject to licensing control. It is therefore inconsistent to let livery yards and animal sanctuaries escape inspection. Many of those opening livery yards and rescue centres have no real specialist knowledge of horses and many horse owners are first time owners. The potential for a disastrous situation is therefore high. Furthermore the current welfare legislation - the Protection of Animals Act 1911 - is not pro-active.</p> <p>Assuming a 1m horse ownership and 1/2 the horses kept in livery yards it is necessary to bring livery stables, trekking centres and animal sanctuaries within the licensing system. A voluntary Code of Practice for livery stables was drawn up by BEVA in 2001 and this could form the basis for a statutory licensing system.</p>
Ragwort poisoning	Ragwort poisoning causes the death of horses but the current legislation - the Injurious Weeds Act 1956 - is not very effective when it comes to the prosecution of those who allow ragwort to grow in land under their control. The law needs to be tightened up so that it becomes an offence to let ragwort grow and this could be included in an Animal Welfare Act.
Abandonment of horses	Compulsory microchipping is necessary. If no microchip is present an abandoned horse could be either re-homed or euthanised without the current delays.
The comfort of horses in wet weather	The Agriculture (Miscellaneous Provisions) Act 1968 requires livestock to be provided with an area of dry ground to lay down on. This protection should be extended to horses.

British Small Animal Veterinary Association

Should there be a new offence of behaviour likely to cause unnecessary suffering	Yes. Legislation should be pro-active. A further refinement is that an owner should look after an animal in a way that is in its best interests and welfare. This would require recommended Codes of Practice.
Should tail docking be banned?	Yes. The procedure is an unnecessary mutilation.
Purchase of pets	The age at which children should be allowed to purchase pets needs to be increased. Careful consideration should also be given to the purchase of dangerous animals or animals requiring special attention as pets.
Electronic training aids and prods	Consultation is taking place in the profession on the advisability of recommending a ban on these products. The BSAVS hopes to be able to provide informed comment by the time that a Bill is ready for consultation.
Breeding of Dogs Acts	The current legislation results in some confusion over the definition of what constitutes a commercial breeding establishment.

British Veterinary Association

The scope of the Animal Welfare Act	The Act should protect all sentient animals (including birds and fish), irrespective of their function with protection from cruelty, unnecessary pain and distress and poor welfare conditions. A similar measure should be in place to protect wildlife. A logical basis for the definition of good welfare can be found in the 'Five Freedoms.' The Agriculture (Miscellaneous Provisions) Act 1968 should be consolidated in the new Act. Define good welfare.
Mutilations	The Animal Welfare Bill should prevent all mutilations, except for those detailed under a separate, accompanying piece of secondary legislation.
Abandonment	The legislation relating to abandoned horses does not allow for speedy action to be taken. This needs to be changed.
Tethering	The existing legislation should be up-dated.
Baiting and fighting	In addition to cock and dog fighting, the Act should deal with badger baiting.
Increased penalties and custodial sentences	Need for increased penalties to include greater use of banning and accompanying supervision orders.
Seizure of animals	Under existing legislation a person guilty of causing cruelty can sign the animal away to a friend or relative but continue to retain control. Therefore the offences can continue.
The time allowed for the investigation of an offence	Should be increased. Also the courts should be empowered to remove the animal from the person under investigation.

The look of the Act	<p>The Act should not go into great detail about the conditions that should be satisfied to ensure the welfare of different species. Secondary legislation would go into the detail, i.e.. Welfare at slaughter, in transit, on farms etc.</p> <p>Secondary legislation and Codes of Practice should also include:</p> <ul style="list-style-type: none"> • Welfare of fish • Companion animals • Captive animals • Breeding of animals • Wild animals and rehabilitation • Pet shops, animal sanctuaries, circuses, boarding establishments, riding and livery establishments, city farms, schools and exhibition aquaria etc. <p>To take this work forward the government should review FAWC recommendations made over the last 10 years. The BVA/KC Canine Health Scheme could also be incorporated.</p>
CAWC	Should be put on the same statutory footing as FAWC
Enforcement Agencies	There should be greater integration between the enforcement agencies. Legislation is to be enforceable and well defined.
The European Context	The EU is likely to turn its attention to companion animals. DEFRA and EU officials need to be in constant communication to ensure that the Act is not heading for early redundancy.

Royal College of Veterinary Surgeons (RCVS)

Should animal welfare law be consolidated and up-dated?	Yes.
Circuses	Circuses and winter quarters should be subject to regular veterinary inspection. Housing, care and animals in films need to be included in up-dated performing animals legislation.
Pet fairs	The sale of pets on any premises should be subject to licensing control. Veterinarian inspection would be desirable in every case.
Age at which a child may buy a pet	Should be raised to 18.
Welfare of captive pheasants	The Agriculture (Miscellaneous Provisions) Act 1968 should apply to all types of captive pheasant.
Keeping exotic or dangerous animals as pets	There may be a case for legislation that deals specifically with exotic or dangerous animals sold as pets. The Dangerous Wild Animals Act 1976 does not always apply and there are loopholes that need to be plugged.
Tail Docking	There would be no objection to legislation that to make it unlawful for a vet. To dock a dog's tail for cosmetic reasons, so long as the vet. had the discretion to operate when it was clinically justified.
A new offence of 'likely to cause unnecessary suffering	The Riding Establishments Act 1964 provides a precedent for forward looking legislation of this kind.
Increase sentences?	The maximum sentences in the 1911 Act are inadequate.
Introduce Codes of Recommendation?	Yes. Will be helpful in defining conditions that are likely to cause suffering.
Licence animal sanctuaries?	Yes.
Licence livery yards?	Yes.
Ban electronic prods?	Yes. This has almost been done for farmed animals under WATO 1997.
Mis-use of bio-technology	The legislation should not be narrowly confined to particular breeding techniques. The European Convention on Pet Animals will need to be considered.

THE RELIGIOUS AND ETHICAL INTEREST

Some common themes

- The view of the Anglican and Roman Catholic Churches is that animals in circuses should be banned.
- The view of the Anglican and Roman Catholic Churches is that 18 should be the minimum age for buying a pet without parental supervision.

Some quotes from the responses

- We do not think unaccompanied children should ever be allowed to buy pets. Those under the age of 18 should be accompanied by a parent, guardian or carer. Pet shops should not be allowed to buy pets while there are so many 'surplus' animals in sanctuaries and rescue centres, many of which have to be destroyed.
The Anglican Society for the Welfare of Animals
- We would like to point out that 'sport hooting' and 'likely to cause unnecessary suffering' as in the Protection of Animals Act do not equate.
The Anglican Society for the Welfare of Animals
- There is even more reason to move away from intensive farming methods and the dangerously competitive horse racing business, to name but two examples.
The Anglican Society for the Welfare of Animals
- The society prefers a complete ban on any public performance of any animal which cannot be responding purely to kindness and 'treats.'
Catholic Study Circle for Animal Welfare
- Prohibit tethering next to busy roads (noise and traffic producing stress); also next to industrial complexes; also on undrained, muddy ground.
Catholic Study Circle for Animal Welfare
- It should be an offence to create any genetically-modified living organism for any purpose.
Catholic Study Circle for Animal Welfare
- A Commission of Enquiry to be established into the extent of needless animal cruelty inflicted in religious slaughter. The remit should include extensive practical investigation of such slaughter both in official slaughterhouses and where it occurs elsewhere in the UK.
National Secular Society

THE RELIGIOUS AND ETHICAL VIEW

Anglican Society for the Welfare of Animals

Animals in circuses	Should be banned. While circuses still exist there should be a licensing system.
Pet Fairs	Private and public pet fairs should be subject to greater regulatory control.
Pet Shops	18 should be the minimum age for an unaccompanied young person. Pet shops should not be allowed to sell animals while there are so many being kept in sanctuaries and shelters.
The welfare of captive pheasants that are being bred for sport shooting	Should be given more protection. 'Sport shooting' and 'likely to cause unnecessary suffering' do not equate.
Keeping exotic or dangerous animals as pets	Should be subject to stricter control, including licensing.
Tail docking	Should be banned.
The creation of a new offence of 'likely to cause unnecessary suffering'	Needs further defining in order to be effective. The horse racing industry and intensive farming cause unnecessary suffering.
Powers of entry, search and seizure	The police should be able to act immediately without a warrant.
Powers of arrest	Should be available to deal with those at animal fights.
Increased sentences	Sentences should be increased vastly without a second chance.
Increasing the time allowed for proceedings to be brought before a court	Increase to 2 years.
Codes of Recommendation	Should be dealt with by Parliament. Codes given by ministers do not have the same authority.
Should animal sanctuaries be licensed?	Yes by a body such as the RSPCA Inspectorate.
Livery stables/ yards	Should be licensed.
Using electronic prods for training	Should be banned.
The mis-use of bio-technology in animal breeding	The breeding of genetically defective animals should be banned. The ban should include breeding animals with emphasised physical characteristics such as Persian cats. There should be tighter legislation concerning biotechnology.

Catholic Study Circle for Animal Welfare

Penalties, licensing and licence fees	Courts should be able to impose far tougher sentences. Licence fees should go up and the professionalism of inspectors increased.
Animals in circuses and other entertainments where animals do not perform naturally	Should be banned.
Training of sheepdogs, horses in dressage or other show events and whips in horse racing	These are all issues that need to be addressed.
Animals in pet shops and fairs	Their sale should be banned.
Buying a pet	Should be 18 and preferably a householder. There should always be adequate provision for the animal and sales to those with a violent criminal record should be banned. The age at which an animal can be sold should be regulated and it should not be possible to buy exotic or dangerous animals.
Cockfighting	There should be tougher sentences.
Animal boarding establishments	Should also include rabbits and other pet animals. There should be regular unannounced visits.
Riding establishments	Licensers should consider the fate of animals if a licence is refused or the owner dies. Also consider whether the horses, ponies and donkeys are physically strong enough for their work.
Pet fairs	Should be subject to greater regulatory control.
Welfare of captive pheasants	Pins and spectacles should be banned.
Tail docking	Should be banned.
A new offence of likely to cause unnecessary suffering	Should be introduced.

Powers of arrest and seizure	Should be increased.
Increasing the time allowed for proceedings to be brought before a court	Should be increased.
Should there be statutory Codes of Recommendation?	Yes.
Should animal sanctuaries be licensed?	Yes. Also let them be inspected by organisations like the RSPCA.
Should livery yards be licensed?	Yes.
Should electronic prods be banned?	Yes.
Tethering	Prohibited. Lifetime ban for 2 nd offence if brief period tethering allowed.
Exotics	Total ban.
Genetically-modified animals	Should not be allowed.

National Secular Society

Slaughter	Slaughter - including religious slaughter - should be subject to greater regulation.
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