Scottish Government invitation to comment on research into tail docking – Joint BVA, BVA Scottish Branch and BSAVA response

1) The BVA is the national representative body for the veterinary profession in the United Kingdom and has over 14,500 members. Its primary aim is to protect and promote the interests of the veterinary profession in this country, and it therefore takes a keen interest in all issues affecting the veterinary profession, be they animal health, animal welfare, public health, regulatory issues or employment concerns.

2) The BVA’s Scottish Branch brings together representatives of the BVA’s territorial and specialist divisions, government, academic institutions and research organisations in Scotland. The Branch advises BVA on the consensus view of the Scottish members on Scottish and United Kingdom issues.

3) The British Small Animal Veterinary Association (BSAVA) exists to promote excellence in small animal practice through education and science. It is the largest specialist division of the BVA representing over 9,000 members, including approximately 500 in Scotland, the majority of whom are in general practice and have an interest in the health and welfare of a wide range of small animals.

4) We are opposed to the docking of puppies’ tails, believing that puppies suffer unnecessary pain as a result of docking, and are deprived of a vital form of canine expression. We believe that surgical operations should not be undertaken unless necessary for therapeutic purposes and therefore, that docking should be banned as a procedure, other than for veterinary medical reasons, for all breeds of dog.

5) We were pleased when our lobbying, alongside a number of other welfare organisations, secured a complete ban on docking in Scotland in 2007 and do not believe that the current evidence for the working dog exemption in England and Wales is robust. Any concession would be a retrograde step for Scotland when prior to now it has always been cited as a key example of the Scottish lead on animal welfare.

6) However, we accept that legislation must be reviewed from time to time. Accordingly, BVA’s Past President Professor Bill Reilly and BSAVA’s Ross Allan represented member views on the tail docking working group. At the time they raised concerns regarding the self-selecting nature of the study and we now welcome the opportunity to comment on the research following its publication in the Veterinary Record.

7) Research paper 1 - Survey of tail injuries sustained by working gundogs and terriers in Scotland
This paper reports on an online survey completed by owners of working dogs recruited through 3 major country sports associations (membership 17,500). Results relate to a self-selecting sample of 1005 respondents and 2860 dogs. We do not believe that the conclusions drawn from this element of the study support a claim for a change to the legislation for the following reasons:

- The response rate in the study of owners was extremely low relative to the number of owners to whom it was advertised and we note that the authors
admit that the low response rate may have resulted in an overestimation of the risk of injury, as owners of dogs which have had tail injuries may have been more likely to complete the survey.
- Although 29% of those completing the survey reported that one or more of their dogs had sustained a tail injury during the survey period (8/8/2011-3/10/2011) only 103 dogs (4.4%) received a tail injury which required veterinary treatment.
- The evidence gathered was anecdotal and owners were not required to provide evidence to support their claims, again, potentially leading to an overestimation in the risk.
- Although the authors conclude that these results suggest a clear potential benefit to be gained from docking (at least by one-third) in spaniels and HPRs, this does not take any account of the pain or distress inflicted by docking puppies.

8) **Research paper 2 - The prevalence of tail injuries in working and non-working breed dogs visiting veterinary practices in Scotland**

This paper reports on tail injuries presented at 16 veterinary practices in Scotland using data mining of computerised clinical records available between 2002 and 2012. The evidence provided by this study suffers from the low number of practices participating and the low prevalence of tail injuries in dogs. The study acknowledges that too few veterinary practices were able to provide comparisons of tail injury prevalence either side of the tail docking ban to make any statistical comparison, except in spaniels. Notwithstanding this, the evidence gathered suggests that over 200 puppies would need to be docked to prevent a veterinary treatment as an adult, with significantly more docked to prevent an amputation as an adult. Even the authors acknowledge that the potential longer term benefit of docking a puppy's tail has to be weighed against the presence of pain during and after docking and we do not consider there is sufficient evidence to justify docking such a large number of puppies in order to prevent such a low number of injuries and an even lower number of adult amputations.

9) We would like to reiterate that surgical operations should not be undertaken unless necessary for therapeutic purposes and that docking should be banned as a procedure, other than for veterinary medical reasons, for all breeds of dog. We have lobbied across the UK for a full ban on the tail docking of puppies and our position is informed by existing peer reviewed evidence. Following a review of the evidence presented in these papers we have not found any reason to change our stated position.

10) All dog welfare groups agree that the docking of dogs' tails for cosmetic purposes cannot be justified. In England, Wales and Northern Ireland, where there are exemptions to the ban for certain working breeds, we believe that the rules are difficult to enforce and for that reason we would urge Scottish Government to stand firm on existing legislation which exemplifies Scotland’s commitment to animal welfare.