

Professor Christine Middlemiss
Chief Veterinary Officer
Department for Environment, Food and Rural Affairs
2 Marsham Street
London SW1P 4DF

23 November 2023

Dear Professor Middlemiss

On behalf of the British Veterinary Association, I am writing to express our concerns regarding the impact on the veterinary profession of the forthcoming ban on XL Bully dogs.

Having been involved in regular meetings with Defra over recent weeks, both as part of the Dangerous Dogs Coalition and separately on behalf of the veterinary profession, we are extremely concerned by Defra's assertion that there is sufficient veterinary capacity to effectively manage the ban. It is simply not possible to make this assertion without a clear understanding of the number of dogs involved, estimates for which currently range between 10,000 – 50,000, nor without knowing how many of these are already neutered and how many will be presented for neutering or euthanasia. It should be noted that the 'precautionary approach' advised by Defra in relation to typing, is also likely to elevate these figures. On this basis, we would be grateful for clarity regarding the provisions Defra has in place to deliver this ban if faced with a lack of veterinary capacity.

To ease the likely pressure on the veterinary profession, we would also like to see an extension to the current neutering deadlines, under which many dogs will be neutered before the recommended age of 18 months. Extending this for dogs who are under seven months old at 31 January 2024, to the end of June 2025, could also benefit their health and welfare, given the growing body of scientific evidence which suggests that the risk of developmental orthopaedic problems, alongside other medical conditions, is significant in large breeds neutered early (Hart et al., 2020a; Hart et al., 2020b). As few companies insure exempted dogs, this would also help to reduce the likelihood of some medical problems in dogs which are now unable to be insured.

We would also like to see an amendment to the neutering confirmation form, as vets do not typically check microchips prior to neutering and other surgical procedures. The requirement for vets to confirm that prior neutering has taken place based on veterinary records is therefore unfeasible as they cannot be absolutely certain that the records relate to the same dog. We are aware of one veterinary organisation in particular which is advising that their staff do not sign the form in this situation. While fraudulent neutering seems unlikely, we would like to see the wording amended to state that the vet confirmed neutering 'to the best of their knowledge'.

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It is also vital that additional support is provided for owners to help them type their dog. The breed standard can be challenging for dog owners to interpret and, given the current lack of support in place due to the delayed training of Dog Legislation Officers, they are therefore looking to the veterinary profession to assist them in this process. We have been very clear that this is not something that vets should be required to do, and note that this is now reflected in the guidance. However, the material made available on the government website would benefit from a layperson guide and, more importantly, owners should be given access to Dog Legislation Officers as soon as they have been trained.

Finally, we would like to raise concerns regarding the uncertainty for the veterinary profession in Scotland and Northern Ireland, given that we are already seeing dogs being moved from England and Wales into these countries, with owners and rescue organisations given the impression that this can save dogs' lives. We would welcome your assurance that Defra will work closely with devolved bodies to agree consistent public messaging and guidance.

We would be grateful for your comments on all of the points raised above and would welcome a meeting to discuss them further.

Yours sincerely



Dr Anna Judson
BVA President

cc The Rt Hon Steve Barclay MP, Secretary of State, Defra.
Marc Casale, Deputy Director - Animal Welfare, Defra

References

Hart BL, Hart LA, Thigpen AP and Willits NH (2020a) Assisting Decision-Making on Age of Neutering for 35 Breeds of Dogs: Associated Joint Disorders, Cancers, and Urinary Incontinence. *Front. Vet. Sci.* 7:388. doi: 10.3389/fvets.2020.00388

Hart BL, Hart LA, Thigpen AP and Willits NH (2020b) Assisting Decision-Making on Age of Neutering for Mixed Breed Dogs of Five Weight Categories: Associated Joint Disorders and Cancers. *Front. Vet. Sci.* 7:472. doi: 10.3389/fvets.2020.00472

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