BVA WELSH BRANCH AND BSAVA RESPONSE TO THE WELSH GOVERNMENT CONSULTATION ON THE PROPOSED CODE OF PRACTICE FOR THE WELFARE OF CATS

1) The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 18,000 members, our primary aim is to represent, support and champion the interests of the United Kingdom’s veterinary profession. We, therefore, take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.

2) BVA Welsh Branch represents members in Wales, bringing together representatives of specialist and territorial divisions, government, academic institutions and research organisations in Wales. The branch advises BVA on the consensus view of members in Wales on Welsh and UK issues.

3) Our response has been formulated in close liaison with the British Small Animal Veterinary Association (BSAVA), which exists to promote excellence in small animal practice through education and science and is the largest specialist division of BVA representing over 11,000 members, as well as with input from our Policy Committee.

Overview

4) We welcome the opportunity to comment on the draft Code of Practice for the welfare of cats and we broadly support the contents of the draft, subject to some minor amendments and clarifications suggested below.

Layout and style

5) The layout and style of the code is clear and easy to understand, making it more accessible for readers. We support using each of the five welfare needs as the focus for the sections as this is a logical structure which will help to embed these important overarching principles of animal care in the minds of owners and potential owners.

6) To ensure clarity, we would welcome an explanation for the reader as to the difference between part 1 and part 2 of the code. It would also be useful to distinguish between parts of the code that relate to the owner’s legal responsibility versus information that may help owners meet this responsibility. For example, at 2.13 the text clearly states ‘As the person responsible for your cat you are expected to…’. It would be beneficial to repeat this type of framing throughout each section of the code.

Preface

7) It should be made clear that a veterinary surgeon should be the primary source of health and welfare advice. The animal care specialists referenced in this section
should be secondary. There should also be greater clarity regarding the difference between failing to meet the welfare needs and causing unnecessary suffering.

**Section 1: Environment**

8) **Sleeping and resting (section 1.2)**

For the third bullet point, we suggest “access to different heights of raised surfaces or beds such as a simple 'platform' type bed or safe access to shelves and the tops of cupboards”.

9) **Hazards**

This section should instruct owners to contact their vet immediately if they have concerns, as the currently wording does not reflect the urgency of this situation. It should also include a link to the AWF Pets and Poisons leaflet.

10) **This section should also outline that owners should not use dog flea treatments to treat cats as this can result in Permethrin or Pyrethroid toxicity.**

11) **Travel**

Section 1.8 mentions that “you could be prosecuted for causing cruelty”. There are many points within the code to which this would apply, so it is misleading to only mention prosecution here.

12) **Going to the toilet**

The sixth bullet point should end with “plus one extra tray”. This is mentioned elsewhere in the document, so adding it here will maintain consistency and aid clarity.

**Section 2: Diet**

13) **Balanced diet**

Section 2.5 of the draft Code could sensibly form part of section 2.4.

14) **The wording for point 2.6 is confusing. We suggest a re-write to say:** “A cat’s ability to digest milk is significantly reduced after it is weaned. Therefore, giving milk to adult cats is not necessary and can cause health problems. Milk should never be given as an alternative to essential fresh water, which must be available at all times.”

15) **Section 2.6 should also make clear that this advice does not just apply to adult cats, but all cats post-weaning.**

16) **Section 2. should make it clear that veterinary advice should be sought in the event of unexplained increase or reduction in appetite.**

17) **Diet and dental health**

In terms of ensuring good dental health through a balanced diet, it is important to note that plaque accumulated irrespective of diet type eg. dry or wet. We would
therefore suggest that the code highlights that the following contribute to good dental health in cats:

- ensure a good quality, balanced diet
- avoid sugar and sweet or sticky food
- healthy foods providing chewing exercise may be beneficial
- large, fibrous kibble, specifically designed to remove plaque is available and may assist reduction of plaque-caused disease

18) With the above in mind, we would welcome the inclusion of the below sentence with regard to maintaining dental health at an appropriate place within the Code of Practice:

*The most effective means of plaque removal and maintaining dental health is daily tooth-brushing with a bristle brush in cats which tolerate this (gradual introduction in young kittens is ideal for stress-free compliance).*

19) **Healthy weight**
Section 2.7 mentions “heart disease and diabetes” as examples of health problems caused by obesity. However, these are not necessarily the two most common obesity related feline diseases. For example, urinary tract disease is more common. This list should be made more accurate, or the sentence changed to the more generic “*Obesity can lead to many serious health problems in cats including diabetes and both heart and urinary tract diseases*.”

20) **How often to feed your cat**
Obesity can be a problem in cats if owners leave out too much food, especially dried food, for them to graze on all day. Grazing may be acceptable if the food used for grazing is counted towards the overall daily food allowance. Depending on an owner’s lifestyle, the daily food allowance for their cat can be divided into 3 or 4 small meals a day. If feeding a mix of wet and dry food along with treats, they all count towards the pet’s daily food allowance. In section 2.10, "*lots of small meals*” is not specific enough, so should be changed to "*several small meals*”.

21) **Body condition**
We support the intention to include body condition diagrams to help the reader identify a healthy weight for their cat, however we would welcome further explanation at this point in the text about the concept of body condition scoring. We would also recommend using the [WSAVA Body condition score chart for cats](#)

**Section 3: Behaviour**

22) **Early experiences**
We recommend adding the following to the end of the first paragraph: “*Young children should never be left alone with any pet for the safety of both the child and the pet.*”
23) **Early experiences**

At section 3.3. as most of the socialisation period will be undertaken when the kitten is still with the breeder, the text should make clear that owners should only take on a kitten that has been well-socialised eg. not a farm cat or feral kitten.

24) **Boredom and frustration**

There is not enough mention of exercise in the current wording for section 3.5. To rectify this, we recommend:

- changing “entertainment” to “mentally and physically stimulating activities”.
- adding “and physical exercise” after “You should ensure that your cat has enough mental stimulation”
- inserting “exercise” into last sentence, to read “such as exercise, play and companionship.”

25) **Recognising and understanding behaviour**

Note that this is a repeat of the first section 3.3 (above Early experiences)

26) **Signs of stress**

Inappropriate urination occurs in both male and female cats. The use of the word “spray” refers to males only, thus we suggest this be changed to “urinate”:

- Section 3.9, ‘spray urine’ should read ‘urinate’
- Section 3.10, “spraying urine” should read “urinating”

Changes in urination can have serious health implications, thus the following should be added to the end of section 3.9: “A change in a cat’s normal toileting or urination behaviour can be a sign of illness and you should seek advice from your vet. A cat who is having difficulty urinating should be treated as an emergency and veterinary advice sought immediately.”

27) **Training**

This section should be made clearer. We suggest replacing the first two sentences with “Cats do not automatically know which behaviours humans consider inappropriate and have to learn this. Negative experiences, such as being shouted at or punished, lead to cats being frightened and anxious, which can in turn lead to undesirable behaviours such as inappropriate toileting.”

This section should also make it clear that the use of electronic training devices/shock collars is not permitted by law (The Animal Welfare (Electronic Collars) (Wales) Regulations 2010). Although this is referenced later in the document, it would be beneficial to include it in this section.

**Section 4: Company**
28) This section should be clarified to avoid mixed messaging to owners.

29) Social behaviour
We suggest adding the following to the end of this section: “Cats do not necessarily require company from other cats to live a fulfilled life and feel more relaxed in the company of human companions than with other cats.”

30) Relations with other animals and people
As explained under ‘signs of stress’ above, “spray” should be replaced with “urinate”.

Section 5: Health & Welfare

31) This section should strongly encourage seeking veterinary advice pre-purchase, particularly with regard to the type/breed of cat, and also any likely health problems or other potential future costs (i.e. clipping for long haired breeds). It should also be clear that inherited health problems may not always be clear from birth and may manifest later in life. Pre-purchase resources such as those available from PDSA and Cats Protection could also be referenced. Potential owners should ensure they can afford the ongoing costs of cat ownership and consider taking out pet insurance.

32) Illness
The wording of the fifth bullet is confusing, and could be worded as follows to improve clarity: “Signs of disease, such as: discharge from the eyes, nose or ears; sneezing or coughing; vomiting; changes in toileting (faecal consistency or frequency, diarrhoea or constipation); changes in urination (amount, frequency, appearance of urine, difficulty passing urine)”

The seventh bullet should also be made clearer: “Coat problems, such as scratching, excessive hair loss, or scabby skin.”

33) Neutering
We strongly support neutering kittens from 16 weeks of age, before reaching puberty, as set out in the BVA position on neutering and BSAVA position on neutering. This section should be strengthened to explicitly encourage owners to neuter their cats.

We also support the Cat Group position on early neutering and would recommend referencing this as additional guidance for when to neuter a cat.

We suggest adding the following sentence to end of the first paragraph (section 5.5): “Kittens who are going to be neutered should be kept indoors or in a completely secure environment away from unneutered cats until their operation, to prevent unwanted pregnancies.”
Identification
We fully support the microchipping of cats and suggest adding the following to this section: “When carried out properly in veterinary practices, microchipping is a safe, quick and inexpensive method of helping an owner and their cat reunite. You should discuss the benefits of microchipping with your vet.”

Appendices

Appendix 1: The Law
This section should also reference the Veterinary Surgeons Act 1966.