1) The BVA is the national representative body for the veterinary profession in the United Kingdom and has over 15,000 members. Our primary aim is to represent, support and champion the interests of the veterinary profession in this country, and 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) The BVA’s Northern Ireland Branch brings together representatives of local veterinary associations, BVA’s specialist divisions, government, and research organisations in Northern Ireland. The Branch advises BVA on the consensus view of Northern Ireland members on Northern Ireland and United Kingdom issues. We have also consulted our Veterinary Policy Group which advises BVA Council on any animal health, animal welfare or public health issues of national interest.

3) We welcome the opportunity to respond to the interim report on the review of the implementation of the Welfare of Animals act (Northern Ireland) 2011. We strongly support the principles underpinning the Act which introduced a duty of care in respect of all protected animals and provided new enforcement powers to allow action to be taken to prevent animals from suffering. We understand that there has been considerable public, political, and media interest in the implementation of the Act, particularly with regard to non-farmed animals, and we were delighted to have been able to participate in the stakeholder discussion sessions in 2014 which were attended by representatives of BVA’s Northern Ireland Branch as well as BVA’s Junior Vice President.

4) We fully support the recommendations outlined in Annex A of the interim review report, in particular:

**Sentencing**
- Recommendation 1: whilst we would not normally comment on sentencing recommendations as we consider this to be outside our remit, we support the decision not to include a minimum sentence as we believe that where possible advice and education is often preferable to prosecution

**Serving the public**
- Recommendation 33-35: as already stated, education and clear and accessible advice for the public must underpin the principles of the Act and we therefore strongly support the recommendations to establish a single animal welfare website bringing together information from the various enforcement bodies as well as the development of a series of ‘quick-guides’ to explain the legal responsibilities of animal owners. We strongly support the proposed awareness campaign aimed at the public and would suggest that, in order to support reporting of welfare concerns, a single, dedicated central telephone number for the public should be provided.

5) In summary, we would like to stress the importance of education for the public with regard to their responsibilities as animal owners and also the appropriate routes for reporting welfare concerns.
We understand that the Welfare of Animals (Dog Breeding Establishments and Miscellaneous Amendments) Regulations 2013 are made under the Welfare of Animals Act (Northern Ireland) 2011 and, in light of recent publicity surrounding large scale dog breeding, their implementation is also being reviewed.

In our response to the 2012 consultation on the draft regulations we stated that:

- minimum staffing levels should be included to protect the welfare of animals and ensure adequate care and socialisation of puppies. We support 1:20 staff to adult dog ratio, with a greater number of staff needed in different circumstances (ie, a whelping or nursing bitch requires more attention than a pregnant bitch so the ratio should have more attendants in that situation). We believe that although a maximum ratio of 20 dogs to 1 attendant should be stated in legislation the exact ratio should be determined by the inspector after consideration of factors such as the size and breed of the dogs being bred and the qualifications and experience of the staff. Consideration much also be given to the time take to socialise puppies and the number of attendants adjusted accordingly.

- a written programme for socialisation should be required, especially since it is often the case that dogs are handed over to charities as a result of behavioural problems. Guidance should be given on what must be included in a suitable socialisation programme. Socialisation should explicitly include the company of other dogs, including adult dogs, and people (and where possible, appropriate children). It is essential that the socialisation programme for puppies is started and maintained while the pups are in the breeding establishment. This is critical from the age of 28 days to 56 days and even more essential if they remain in the breeding establishment beyond 56 days

We believe that the current Regulations are inadequate in a number of respects, including, but not limited to, socialisation, staff to dog ratio, minimum mating age, health screening and line breeding, such that the welfare of breeding bitches and their litters are not always being fully met. Whilst we support DARD’s efforts to review the implementation of the regulations in light of recent public concern, we believe that the regulations themselves, rather than their implementation, remain inadequate, leading to establishments which are not meeting the welfare needs of their stock, particularly with regard to socialisation, being able to operate fully within the law, endorsed by license.