WELSH GOVERNMENT CONSULTATION ON CODE OF PRACTICE FOR THE WELFARE OF DOGS – BVA / WELSH BRANCH / BSAVA RESPONSE

1) BVA is the national representative body for the veterinary profession in the United Kingdom and has over 17,000 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 Welsh Branch brings together representatives of the BVA’s territorial and specialist divisions, government, academic institutions and research organisations in Wales. The Branch advises BVA on the consensus view of the Welsh members on Welsh and United Kingdom 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.

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

5) Preface
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.

6) Duty of care
It would be useful to have clarification on proposals to raise the profile of the Code, particularly amongst those groups least likely to be aware of their duty of care.

7) Environment
It could be useful to provide additional clarification that ‘comfortable’ space for sleeping and resting should, as a minimum, include sufficient space for the dog to lie out flat. The guidance on outside space should apply to all dogs, not just those who are to be kept or left outside, and there should be a maximum/minimum temperature range given for outside housing in line with Defra Dog Boarding guidance.

Section 1.11 on hazards should include a link to the AWF Pets and Poisons leaflet

Section 1.14 should be much more emphatic and clearly state that dogs should not be left in cars, even on a seemingly mild day, and include links to the Dogs Die in Hot Cars campaign.

8) Diet
It should be clear that feeding a balanced diet in the correct quantities and appropriate for the individual life stage is important for maintaining optimum body
weight, as well as for ensuring provision of essential nutrients, and that veterinary advice should be followed.

Section 2.10 on body condition requires the owner to recognise that 'stomach looks empty' which does not seem to be a reasonable expectation. Body condition score diagrams should be included.

Section 2.14 should be clear that veterinary advice should be sought in the event of unexplained increase or reduction in appetite.

### 9) Behaviour

The requirement to keep dogs on a lead in built up areas should reference the relevant legislation (Road Traffic Act 1988 and Dogs (Protection of Livestock) Act 1953).

Section 3.12 should be clear that the use of electronic training devices/shock collars is not permitted by law (The Animal Welfare (Electronic Collars) (Wales) Regulations 2010).

### 10) Health

Section 5.2 should be clear that the dog’s vet means the dog’s veterinary practice and may include other individual vets and veterinary professionals within that practice. This section should also refer to the importance of being familiar with the practice out-of-hours provision.

This section should strongly encourage seeking veterinary advice pre-purchase, particularly with regard to the type/breed of dog, and also any likely health problems or other potential future costs (ie 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 Dogs Trust could also be referenced. Potential owners should ensure they can afford the ongoing costs of dog ownership and, if appropriate, consider taking out pet insurance.

Section 5.12 should be clear that there are many health, welfare and societal benefits to neutering, however, there are some increased risks for some conditions, and these may vary dependent on breed. The decision to neuter should be taken in consultation with the dog’s vet.

The section on identification (5.15-5.16) should make it clear that dogs should be microchipped before purchase/first change of ownership, and that the keeper/breeder has a legal obligation to register the microchip prior to sale.

### 11) Appendix 1: The Law

This section should also reference the Veterinary Surgeons Act 1966.

The reference to taking dogs abroad should also include the importance of preventive health care measures in line with veterinary advice.

### Conclusion

12) In conclusion, we support the draft Code subject to the minor additions and clarifications detailed above.

January 2018