
Joint Submission

Comments on revised draft of Dog Breeding Establishment Guidelines, November 2016



Simon Coveney TD,
Minister for Housing , Planning and Local Government,
Customs House,
Dublin 1.

27th February 2017

Dear Minister,

The Dublin Society for Prevention of Cruelty to Animals (DSPCA) and the Irish Kennel Club (IKC) are the leading organisations in Ireland in our respective fields of welfare and dog breeding. We have decided to submit this joint submission to you in response to the publication of the revised Draft of Dog Breeding Establishment Guidelines published by your department in November 2016.

Both our organisations believe that the guidelines as published do not go far enough in introducing adequate controls over these establishments. We see the guideline review as an opportunity to review the breeding process in its entirety from selection of breeding stock, breeding, puppy welfare and retirement.

Ireland's reputation as the puppy farm capital of Europe is a matter of public concern and this needs to change. The emotional attachment to dogs is very strong. The public do not perceive puppies and dogs simply as commodities to be bought and sold. There is strong public demand for puppy breeding to be regularised to the benefit of the breeding stock, the puppies themselves and the consumer.

Dogs are domesticated animals and by their nature are not animals that should be farmed in intensive, large scale commercial establishments.

The Guidelines as drafted appear not to be compulsory and should contain penalties for noncompliance. This submission has four distinct sections;

- > **Responsible Breeding**
- > **Animal Welfare**
- > **Consumer Protections**
- > **Enforcement Provisions**

Responsible Breeding

A: Comments – impact on behaviour and medical condition.

Both puppies and breeding bitches can suffer both behaviourally and medically from their time spent on large scale commercial establishments. A recent study published in the Journal of the American Veterinary Medical Association, found that pups bred in large scale commercial units suffer stress pre and post-natal as a result of the environment that exists in these establishments (1). This study also found that puppies bred in large scale breeding units are more likely to demonstrate aggression towards humans and other dogs than those born in non-commercial systems. In fact, a study by Newcastle University discovered that across all behaviour categories, including trainability, dogs from less responsible breeders had significantly less favourable behaviour and temperament scores than puppies from responsible breeders (2). It seems that some puppies never seem to fully recover from the stress and trauma of being born on a large scale commercial establishment. The guidelines as drafted disappointingly do not address the impact that the large scale of these establishments have on these puppies, and on the breeding bitches producing these offspring.

Recommendations

We therefore, strongly believe that the guidelines should require a maximum of 20 Breeding Bitches per licenced premises. This will go some way towards improving the long term outlook for dogs both behaviourally and medically. Additionally, in a recent MRBI poll (4) it was the majority view (79%) that there should be a maximum number of breeding bitches per establishment and the majority when asked cited a single figure.

B: Comments – husbandry practices

We believe that dog husbandry practices are weak in the guidelines.

Recommendations – husbandry practices

We would suggest that the following husbandry practices are mandatory:

- a) Bitches should not be bred on first heat.
- b) Bitches should not be mated under one or over eight years of age.
- c) Bitches should not be bred on consecutive heats and a maximum of three litters in any three year period.
- d) Bitches should be retired from breeding, neutered and rehomed appropriately after a maximum of four litters. In exceptional circumstances a bitch may produce a further litter provided she is certified fit to do so by a registered veterinary surgeon. Additionally, a bitch should be retired if she has delivered two litters by caesarean.

Responsible Breeding - *continued*

- e) In all cases euthanasia should not be the method of retirement used.
- f) The internal temperature of kennels depending on breeds should be between 8 and 18 degrees centigrade.
- g) Whelping areas should be free of loud noise, draft free and heated with either heat lamp or pads.
- h) Pups should be gradually weaned from four weeks old and offered food on a regular basis throughout the day.

It is our view that pups should be kept with Breeding Bitches until a minimum of six weeks old and rehomed at a minimum age of eight weeks. We are aware of cases where pups have been removed from bitches as young as four weeks old. Fear and anxiety may cause physiological stress responses in dogs which are exposed to fear or anxiety inducing situations, such as early separation. These stress responses could be related to illness, disease and decreased lifespan (3). The experience of the DSPCA is that many puppy farmed pups experience gastro-intestinal problems over a sustained period as a result of stress and early weaning.



Example of a Whelping Chamber on an Irish Puppy Farm. Each one of these boxes contain a mother about to give birth or has recently given birth.

Animal Welfare

Comments – Animal Welfare

It seems to us that the priority in many of these establishments is the quantity of pups produced and the primary objective has been the maximisation of the profits for the breeder. Animal Welfare has sadly not been a priority.

We believe that the current proposals will do little more than legitimise dog breeding establishments which fall short of acceptable welfare standards.

We draw issue with the following proposals detailed in the Guidelines;

Recommendations – Animal Welfare

1.1.5 "Dogs to express normal behaviour and in particular to provide adequate socialisation and exercise"

We do not see any provision in the guidelines which requires that this occurs. We are at a loss to understand how this can practically be achieved in establishments housing large numbers of breeding dogs.

2.3 Staff "recommended ... one whole time equivalent per 30 Bitches"

We believe this ratio is wholly inadequate. This equates to approximately 14 minutes per dog per day. In this time a worker cannot feed, clean, socialise and supervise exercise for a dog.

The DSPCA houses and cares for a large number of dogs at our Rescue Centre and IKC members have experience of housing dogs. In our experience a ratio of one staff member per 10 dogs would be the minimum we would expect.

10 "Inspection of a DBE by Authorised Officers"

We note the guidelines state that DBE's will be subject to unannounced inspections by Authorised officers under the Control of Dogs Act. We recommend that Authorised Officers under the Animal Health and Welfare Act 2013 should have similar inspection powers.



Consumer Protection

Comments – Consumer Protection

Many DBE's go to great lengths to disguise to the public the origin of the puppies being sold. We believe that most consumers given the choice would not knowingly purchase from a puppy farm. This again is borne out by a recent MRBI poll (4).

In this recent MRBI poll (4), 90% of those surveyed favour the disclosure of the origin and place of birth of all puppies however sold. This Poll also indicated a high level of support for regulation of DBE's including;

- Registration and making the register available to the public
- Minimum standards should apply to all DBE's
- DBE's should be subject to unannounced inspections by authorised officers under the Animal Health and Welfare act.

Recommendations – Consumer Protection

We recommend that DBE's be registered and issued with a licence number. All advertising of dogs and puppies for sale from a DBE should quote the vendors DBE licence number. The register should be publicly available. In addition, DBE premises should be subject to unannounced inspections by authorised officers under the Animal Health and Welfare act and the Control of Dogs act .



Enforcement Provisions

Comments – Enforcement Provisions

We do not accept that the current light handed approach towards those in default of DBE laws and guidelines can continue. The guidelines as published are not mandatory and do not contain sanctions.

Recommendations

Those commercial breeders found with unlicensed premises or where the numbers of breeding bitches are in excess of the number authorised should be subject to confiscation and where possible rehoming of their animals together with significant fines.

We would welcome the opportunity to review this submission with you and your officials in the near future.

Yours sincerely,

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Enclosure

MRBI 'Public Perception on Commercial Dog breeding' 2017

References:

- (1) McMillan, Franklin D., et al. "Differences in behavioural characteristics between dogs obtained as puppies from pet stores and those obtained from noncommercial breeders." *Journal of the American Veterinary Medical Association* 242.10 (2013): 1359-1363.
- (2) "Do puppies from 'puppy farms' [puppy mills] show more temperament and behavioural problems than if acquired from other sources? Using CBARQ to assess" Rebecca Gray, Catherine Douglas, Sophie Butler and James Serpell, Presented at British Society of Animal Science "Annual Conference", Chester, UK, 6th April 2016.
- (3) Public Perception on Commercial Dog Breeding (2017) Ipsos MRBI
- (4) Dreschel, N. A. (2010). The effects of fear and anxiety on health and lifespan in pet dogs. *Applied Animal Behaviour Science*, 125, 157-162.
- (5) Voris, H. C., Wittum, T. E., Rajala-Schults, P. J., Lord, L. M. (2011). Characterization of advertisements for puppies sold online: Determinants of cost and a comparison with parents club breeders. *Preventative Veterinary Medicine*, 100, 200-209.