



THE KENNEL CLUB

A  
VOICE  
FOR  
DOGS



# FROM THE CHAIRMAN

With an election dominated by Brexit, we have written a manifesto on behalf of the nation's dogs, whose welfare is paramount and who are unable to speak for themselves. The last Government took a number of steps to improve animal welfare - notably the passing of a ban on the third party sale of puppies, which was a key demand in our previous manifesto.

Similarly, we have long campaigned for remote control electric shock collars to be banned and for maximum sentences for animal cruelty offences to be increased, and we were delighted when the previous Government committed to outlaw shock collars and pass the Animal Welfare (Sentience and Sentencing) Bill. Sadly however, the early dissolution of Parliament meant that neither regulations on shock collars or the Sentencing Bill were passed. It is vital that both of these issues are taken up by an incoming Government.

The Kennel Club offices in Aylesbury and London are filled with dog lovers who work tirelessly to improve the lives of dogs through the services and schemes we offer to all dog owners and those working with dogs. We provide an unparalleled source of education, experience and advice on 'all things dog': breeding, health, acquisition, training, and responsible ownership. We register around a quarter of a million pedigree dogs each year as well as approximately 3,500 crossbreed dogs on our companion and activity registers. We run Petlog, our microchipping database, which holds details of five million dogs and we self-regulate around 4,000 breeders through our Assured Breeder Scheme. In addition we provide support to 1,700 dog training clubs through our Good Citizen Dog Scheme and accredit dog training instructors via our Kennel Club Accredited Instructors programme.

However we are calling on an incoming Government to further the welfare of dogs at a national level in the ways set out in our manifesto. These are the issues for which we want to give a dog a voice, which we hope will be heard.

**Tony Allcock OBE**  
Kennel Club Chairman

# RESPONSIBLE BREEDING

## ENCOURAGE RESPONSIBLE DOG BREEDING

Ensuring there is a good supply of puppies bred by responsible, low volume breeders, from loving homes, is of paramount importance, as how a dog is bred impacts its health, welfare and socialisation throughout its life. The previous Government updated breeding regulations as part of the Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018.

## UNINTENDED CONSEQUENCES OF CURRENT REGULATIONS

The Kennel Club registers approximately one third of puppies bred and acquired in the UK – around 250,000 puppies per year. The dog breeding sector is unique and consequently widely misunderstood; over 90 per cent of people who register puppies with the Kennel Club will register one or two litters in a year. Since the introduction of the 2018 Regulations, we have seen many low volume, home breeders reducing the number of litters they have, with some no longer breeding puppies at all, which is concerning since they are the ideal source of a family pet.

Based on our puppy registration data, we're expecting to see 20-25,000 fewer puppies per year being bred and registered with us by low volume, home breeders. Given that Kennel Club registered puppies only account for around one third of annual supply, we expect that the changes to breeding regulations may have resulted in excess of 50,000 fewer puppies each year being bred by low volume breeders. We reasonably assume this shortfall will be met by unethical, low welfare puppy farmers and importers.

## COMPLEX REGULATIONS

Local authorities must consider two key factors with regards to whether a dog breeder requires a licence: 1) whether a dog breeder breeds three litters per year or more or; 2) whether a dog breeder who breeds fewer than three litters per year meets criteria set out in a business test. The business test is complex and, as a result, whether or not a one or two litter breeder, or even a less frequent breeder requires a licence, is a postcode lottery which via our survey work we know has deterred them from breeding. 89 per cent of breeders consider themselves hobby breeders, unmotivated by profit and who go to great expense to breed puppies responsibly. Yet many are being told that if they advertise even one puppy for sale they will require a licence.

For those breeding three or four litters in a year who require a licence, the licensing system is too complex, bureaucratic and expensive. It places the same burden on them as high volume breeders.

## LACK OF SELF-REGULATION

The Kennel Club encourages breeders to join our Assured Breeder Scheme. The scheme gained independent accreditation from UKAS over 10 years ago and effectively self-regulates around 4,000 breeders (compared to local authorities who inspect fewer than 700). The standards of the scheme include making use of breed specific health tests and preventative health measures, and ensuring puppies are vet checked prior to sale. The previous Government recognised Assured Breeder Scheme members within the 2018 Regulations, which incorporate a risk-based element, awarding breeders a star rating/risk rating based on compliance history and welfare standards, by stipulating in guidance that Assured Breeder Scheme membership can count towards compliance history in the absence of a licence.

Given the high standards set by the scheme, coupled with the fact that local authorities are under-resourced to license three times the number of breeders that they had to previously, we believe the regulations should be amended so that scheme members are regulated under the Assured Breeder Scheme rather than by local authorities.

### WE ARE CALLING ON AN INCOMING GOVERNMENT TO:

- Simplify the 2018 dog breeding regulations by removing the business test
- Fully embed the Assured Breeder Scheme into the 2018 Regulations, allowing the scheme to self-regulate its members
- Incentivise low volume domestic breeders to breed puppies to ensure a good supply and ensure that the licensing system is more proportionate for low volume breeders



# MICROCHIPPING & REGISTRATION

## ENSURE ALL DOGS ARE MICROCHIPPED AND REGISTERED ON A COMPLIANT DATABASE

Whilst this is currently the law under the Microchipping of Dogs (England) Regulations 2015, the regulations are due to be reviewed in 2020, and are subject to a sunset clause which is due to activate in April 2022. The Kennel Club is responsible for Petlog, one of the UK's largest database owners – meaning it has met the standards set out in the 2015 Regulations and receives 60,000 calls annually to assist pets and owners being reunited. Since the law changed there has been an increase in the number of dogs microchipped (90 per cent - up from 70 per cent in 2011). However there are still incidences of microchipped dogs not being reunited with their owners.

## DUPLICATED REGISTRATIONS

Since it became a legal requirement for dog owners to microchip their pets, many more microchip databases have entered the market to take advantage of the business opportunity. Some act unethically, offering a form of service where they will register a chip without checking to see whether the chip is already registered with another database, thereby compromising the reunification prospects, particularly the look up process to locate a keeper. In addition to this it creates a problem for a new keeper i.e. they may find that they are unknowingly non-compliant with the law.

## STANDARDS OF DATABASE OPERATORS AND IMPLANTERS

Petlog and other leading microchip databases provide a high level of service to their customers, including the required 24/7 phone line. However it is difficult for dog owners to know which databases are compliant with the 2015 Regulations since some non-compliant databases make misleading claims and even compliant databases run their businesses without Defra providing any formal checks and balances on the level of service provided.

Similarly due to the young age at which puppies must be microchipped, it is suspected that incidences of microchips migrating have increased (the Veterinary Medicines Directorate has however stopped publishing data on this). It is therefore imperative that microchip implanters are trained to a high standard. Yet training companies offering quick and

cheap services can establish themselves fairly easily, and as a result do not provide a good enough service. Defra should provide checks on training being offered to implanters to ensure it is of a high standard.

## AWARENESS OF LEGAL REQUIREMENTS

A recent report<sup>1</sup> shows a reduction of accurate microchip data: reducing to 25 per cent from 29 per cent in 2018. The main reason for this is that keepers are failing to update the microchip databases (60 per cent of stray dogs implanted with a chip now have an inaccurate record). It is our view that dog owners need to be more effectively informed of their legal requirements.

<sup>1</sup> Compulsory Microchipping Three Years On, Battersea, 2019

## WE ARE CALLING ON AN INCOMING GOVERNMENT TO:

- End the practice of duplicated registrations to aid reunification
- Raise standards of database operators and implanter training providers to ensure a better service for pet owners
- Increase awareness of microchipping obligations to dog owners



# THE BENEFITS OF DOG WALKING

## RECOGNISING THE HEALTH BENEFITS OF DOG WALKING

Dogs have been man's best friend for centuries; the latest figures suggest that there are approximately nine million pet dogs in the UK, with one in every four households having a pet dog.<sup>2</sup> Dog ownership results in physical and mental health benefits for the whole family. One of the most important and enjoyable elements for most dog owners is getting out in the fresh air to take their dogs on a walk.

Since the introduction of the Animal Welfare Act 2006, there is a legal requirement for those responsible for dogs to provide them with 'suitable exercise', which means regular opportunities to walk and run off lead.

## IMPACT OF AN IRRESPONSIBLE MINORITY

While the majority of dog walkers are responsible, unfortunately there is an irresponsible minority who don't pick up after their dog or allow their dogs to run out of control. This behaviour has resulted in an increasing number of local authorities introducing ever-more stringent restrictions on where dog walkers may exercise their dogs. Many restrictions require dog walkers to keep their dogs on a lead in places such as parks or beaches, or ban people taking dogs into these areas altogether.

The Kennel Club accepts that there are scenarios where restrictions on dog walkers are required and justified, but many simply make it harder for dog owners to provide appropriate exercise for their dogs. Since the introduction of Public Spaces Protection Orders, under the Anti-social Behaviour, Crime and Policing Act 2014, we are increasingly being contacted by dog walkers whose lives are being blighted by these Orders, as they are being left without accessible or practical spaces to walk their dogs.

## CONSULTATION AND LEGAL CHALLENGE

The Anti-social Behaviour, Crime and Policing Act allows local authorities to introduce restrictions on dog walkers with very limited requirements to consult. The Kennel Club is the only welfare organisation cited in guidance as a body which should be consulted as we are a leading expert on these Orders and have the most accurate record of what restrictions have been enacted across the country. However we typically rely on concerned dog owners to let us know about their local authorities proposals. What is more concerning is that the financial cost and time required to challenge the Orders through the High Court is not within the means of a typical dog owner.

<sup>2</sup> <https://www.pfma.org.uk/pet-population-2019>

### WE ARE CALLING ON AN INCOMING GOVERNMENT TO:

- Amend the Anti-social Behaviour, Crime and Policing Act to provide a more accessible route for dog owners to challenge the validity of Public Spaces Protection Orders, such as a binding mediation process or through the Local Government and Social Care Ombudsman
- To require local authorities to ensure the provision of accessible and practical space for dog owners to walk their dogs off lead



# PREVIOUS COMMITMENTS

## ELECTRIC SHOCK COLLARS

### BAN THE USE OF REMOTE CONTROL ELECTRIC SHOCK COLLARS

It is widely accepted that the use of electric shock collars to train dogs is detrimental to animal welfare and totally unnecessary. This is the united view of all major animal welfare organisations, leading dog training organisations and UK and European veterinary bodies.

Shock collars were banned by the Welsh Government in 2010 and the Scottish Government introduced guidance condemning the use of shock collars in 2018. There was widespread cross-party support in the previous Parliament for a ban, and following public consultation the Government announced that it was going to introduce a ban on their usage.

### HIGH COURT DELAYS

Unfortunately due to a High Court legal challenge, the legislation could not be introduced before dissolution. The shock collar lobby attempted to challenge the legality of the Government's consultation; however, this challenge was dismissed by the High Court in October 2019.

### AN OPEN GOAL FOR THE NEXT GOVERNMENT

The next Government will arrive into office with everything in place to swiftly introduce a ban on the use of remote control electric shock collars. The ban can be introduced using secondary legislation under the Animal Welfare Act 2006 and will allow a new Government to lay a marker down that it will be a champion for animal welfare.

#### WE ARE CALLING ON AN INCOMING GOVERNMENT TO:

- Implement a ban on the use of remote control electric shock collars without delay

## ANIMAL CRUELTY SENTENCING

### TOUGHER SENTENCES FOR CRUELTY AGAINST DOGS

We were disappointed to see the Animal Welfare (Sentencing) Bill fail to pass before Parliament dissolved. The Bill would have raised the maximum prison sentence of six months for cruelty to animals, to five years in England and Wales, thereby presenting a far stronger deterrent to would-be abusers.

The Bill received cross-party support, as well as the backing of major animal welfare organisations. We strongly urge the incoming Government to prioritise its reintroduction immediately; the continued delay only acts to sustain an inadequate sentencing system which fails to protect dogs at their most vulnerable.

The current six month maximum sentence is the weakest in Europe as well as weaker than countries such as Ireland, Northern Ireland, Japan and the United States. Recently the Scottish Government committed to passing the Animals and Wildlife (Penalties, Protections and Powers) (Scotland) Bill, which will raise the current one year maximum sentence for animal cruelty to a more proportionate five years for the worst offences.

#### WE ARE CALLING ON AN INCOMING GOVERNMENT TO:

- Immediately reintroduce animal welfare sentencing legislation to extend maximum cruelty sentences to five years



# LIVESTOCK WORRYING

## DEALING WITH LIVESTOCK WORRYING

Livestock worrying, and the resultant impact on farmers and other stakeholders who deal with the aftermath of an attack, is an issue that the Kennel Club has taken very seriously for a number of years. Though we primarily represent dogs and their owners, we also own a farm with around 1,400 sheep and a breeding herd of 43 Galloway cattle, so we have a dual interest in this matter. We continue to work with a range of partner stakeholders including the police, National Farmers Union and local authorities to develop measures to reduce the number and impact of livestock attacks.

Livestock attacks are a highly emotive issue, and when they occur there is often a clamour to call for a change to the existing legislation i.e. the Dogs (Protection of Livestock) Act 1953. However, knee jerk changes to legislation very rarely achieve improved outcomes. Livestock worrying is a very serious issue, and deserves a considered, thought through response.

## UNACCOMPANIED DOGS

Typically, people taking their dogs for a walk in the countryside are most commonly held up as the reason for livestock worrying. As such, many high profile campaigns have been run to try and educate dog walkers of their responsibility to prevent these incidents occurring.

However, while people walking their dogs are the cause of some livestock attacks, police figures repeatedly show the majority of livestock attacks occur from unaccompanied dogs i.e. stray dogs or those allowed to roam. According to statistics from five police forces in England, Scotland and Wales, around seven in ten livestock worrying incidents take place due to unaccompanied dogs. Yet, historically very little has been done to try and deal with this cause of attacks. We believe that more needs to be done, both in terms of education and refocusing enforcement, on unaccompanied dogs worrying livestock.

## ALTERNATIVE MEASURES

With regard to the impact of dog walkers, we have for a number of years been working with partner organisations to develop non-legislative best practice to reduce incidents of livestock worrying. Examples include ensuring signage regarding the presence of livestock is accurate and up to date. This enables dog owners to know where they need to keep their dogs on a lead and where they can let their dogs off lead. Whilst a relatively simple step, it has resulted in significant reductions in livestock attacks where trialled.

Likewise some landowners have been working in partnership with local authorities, access user groups and the Health and Safety Executive to offer temporary alternative routes to dog owners, giving them an informed choice to avoid livestock on their walks. The overwhelming majority of dog walkers will avoid livestock if given a choice, especially due the incidences of death and life-changing injuries caused to walkers, most often with dogs, by cattle every year.

## WE ARE CALLING ON AN INCOMING GOVERNMENT TO:

- Commission behaviour change experts to develop a campaign to reduce the prevalence of livestock worrying by unaccompanied dogs
- Assess and promote best practice, non-legislative measures which will empower dog walkers to avoid livestock and conflict on their walks





# DANGEROUS DOGS

## 'BREED SPECIFIC LEGISLATION' FLAWED AND FAILING

The UK's existing 'dangerous dogs' laws are deeply flawed. While there are at least nine separate pieces of active legislation, the most relevant is the Dangerous Dogs Act 1991. This Act places a misguided focus on how a dog looks, outlawing four types of dog. This has the unwanted effect of diverting attention away from the behaviour and temperament of the dog, and of course its owner.

The current approach, widely referred to as 'breed specific legislation', is failing dogs, dog owners and most importantly, the victims of dog attacks. Considerable police, local authority and court resources are spent assessing and exempting dogs, which have been seized based purely on appearance. Whilst aggressive dogs which don't fit the appearance criteria of the four banned types largely go under the radar until they bite someone.

## DATA BLACK HOLE

There is a lack of reliable data regarding the number of dog attacks across the UK, spanning their severity, the breeds and types involved, the role of the owner in the incident, or analysis of any other factors leading up to the attack. The absence of this information considerably limits our ability to develop an evidence-based preventative approach to dog bites and attacks.

To assist with this, the previous Government agreed to explore the collection and sharing of data with the National Police Chiefs' Council and other police forces.<sup>3</sup>

Whilst we welcome this, we believe that a central database to log all dog attack incidents should be created to record relevant details for each incident. All key agencies should be involved in providing the data, including local authorities, the police and the medical profession, as well as behaviourists for more serious incidents, to make more detailed assessments of the dog involved.

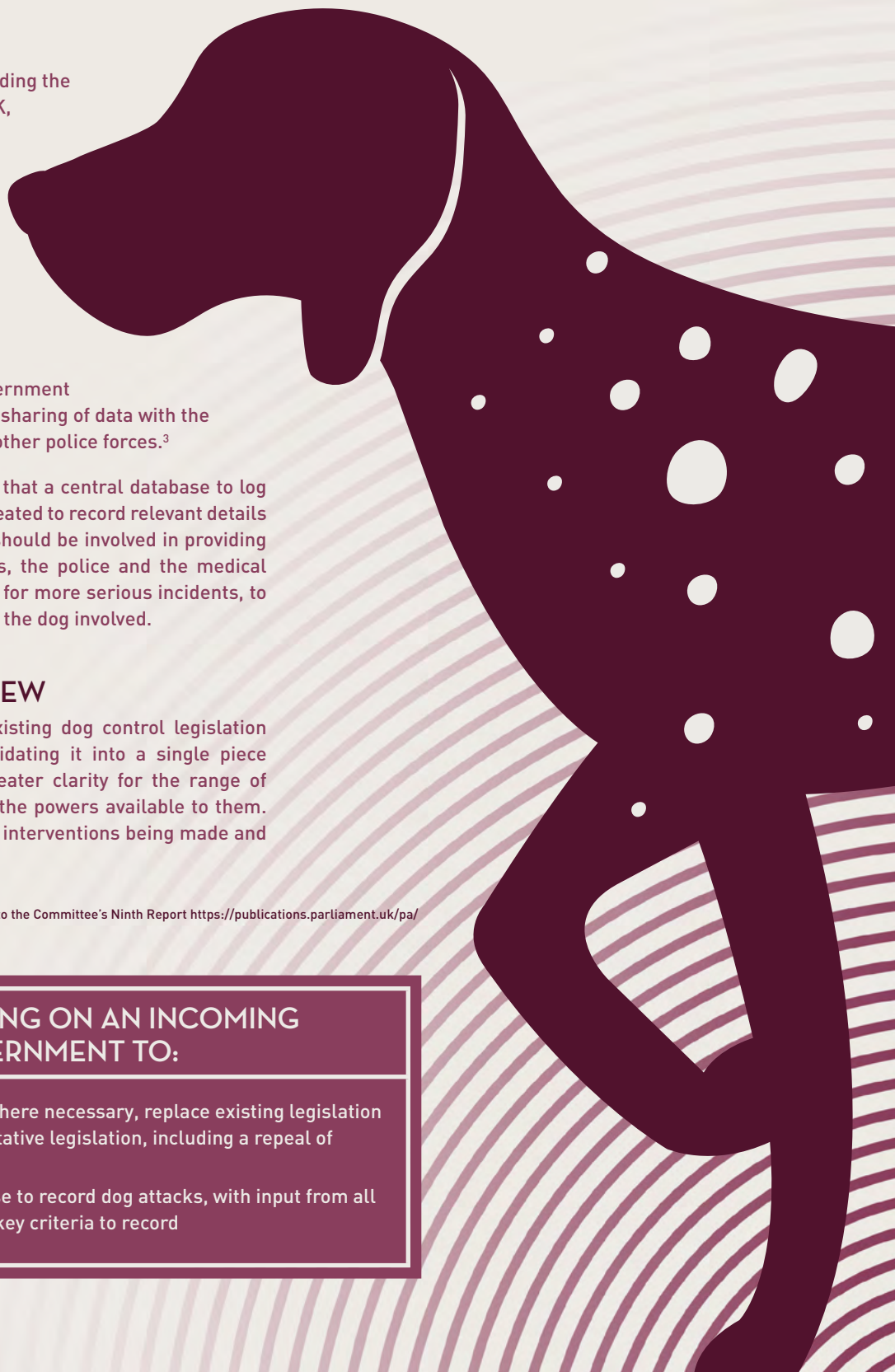
## FULL LEGISLATIVE REVIEW

We believe that a full review of existing dog control legislation is required, with a view to consolidating it into a single piece of legislation. This would allow greater clarity for the range of agencies involved in dog control of the powers available to them. It should result in more appropriate interventions being made and we believe, better outcomes.

<sup>3</sup> Controlling dangerous dogs: Government Response to the Committee's Ninth Report <https://publications.parliament.uk/pa/cm201719/cmselect/cmenvfru/1892/1892.pdf>

### WE ARE CALLING ON AN INCOMING GOVERNMENT TO:

- Review, consolidate and, where necessary, replace existing legislation on dog control with preventative legislation, including a repeal of 'breed specific legislation'
- Establish a central database to record dog attacks, with input from all key stakeholders over the key criteria to record



# FIREWORKS RESTRICTIONS

## REVISE FIREWORKS REGULATIONS

The Kennel Club believes that current Fireworks Regulations should be revised to reduce unnecessary distress and trauma to dogs. The use of fireworks for traditional and religious events has long been a source of anxiety to dogs and their owners, however the increasingly common use of fireworks year-round has worsened this situation significantly. In November this year it was reported that a young puppy died from stress as a result of fireworks and each year fireworks cause numerous dogs to stray. An incoming Government needs to act decisively to protect dogs from the damaging consequences of firework use.

## GROWING PUBLIC SUPPORT

Calls for stronger regulation of fireworks have intensified with 94 per cent of respondents to a recent Scottish Government consultation calling for more controls over the sale of fireworks, and parliamentary petitions supporting stricter regulations of fireworks having totalled 750,000 signatures in the past three years.<sup>4</sup> The negative effects of fireworks are not limited to dog welfare - the Kennel Club has previously collaborated extensively with the Children's Burns Trust and PTSD UK to raise awareness of the impact of fireworks.

The Parliamentary Petitions Committee held an inquiry into fireworks and published their report in October 2018 and found that existing laws do not protect people and animals from harm, and that action is now needed.<sup>5</sup>

## RESTRICT FIREWORKS TO LICENSED EVENTS

We believe that the use of fireworks should be limited to licensed events only, very much in line with the recommendations of the Parliamentary Petitions Committee, as set out, within their 2019 report. If this were the case, the acquisition and use of fireworks would require a licence from the relevant local authority and would require the buyer to specify where and when the fireworks would be used. Licence fees could either be nominal, purely to cover the costs of an online licensing system, or be proportionate to the display size.

This would enable local authorities to compile and maintain a publicly available list of when and where fireworks are to be set off, thereby facilitating dog owners in taking mitigating actions. Additionally, we wholeheartedly support the Parliamentary Petitions Committee's recommendation for the reduction of the maximum decibel limit of fireworks as the current limit is evidently incompatible with dog welfare.

<sup>4</sup>'A consultation on fireworks in Scotland'; <https://www.gov.scot/publications/consultation-fireworks-scotland-experiences-ideas-views-analysis-responses-public-consultation-exercise/>

<sup>5</sup>House of Commons Petitions Committee Fireworks: First Report of Session 2019' <https://publications.parliament.uk/pa/cm201920/cmselect/competitions/103/103.pdf>

<sup>6</sup>ibid

### WE ARE CALLING ON AN INCOMING GOVERNMENT TO:

- Restrict the use of fireworks to licensed events
- Lower the maximum decibel limit of fireworks
- Follow advice of the Parliamentary Petitions Committee and conduct a review of the safety and animal welfare concerns regarding fireworks



# BREXIT AND PET TRAVEL

## PUPPY SMUGGLING AND THE PET TRAVEL SCHEME

The Pet Travel Scheme (PETS) rules were changed in 2012 which resulted in a relaxation of the UK's quarantine and animal health controls. The number of dogs entering Great Britain under PETS in 2015 was 164,836 compared to 85,299 entering in 2011.

Investigations have found that PETS is regularly used as a cover to import puppies for commercial purposes and revealed the fraudulent issuing of pet passports with falsified data, the importation of underage puppies and issues with controls at the border.

## BETTER PROTECTIONS NEEDED

The existing Pet Travel Scheme rules not only facilitate puppy smuggling, but also pose significant risks to both human and animal health. We would like to see a number of amendments to introduce more stringent conditions in relation to rabies testing, tick treatment and tapeworm treatment.

We also believe there is a need for a central database for logging dogs' microchip numbers when they enter the country. Currently, there is no traceability when welfare organisations take in dogs and cats with a microchip from another country, and it is not possible to tell if the animal came into the country legally. A centrally accessible database, logging dogs' microchip numbers, would help welfare organisations to undertake a risk assessment for such animals and in the event of a disease outbreak it would enable control measures to be more effective.

All the recommendations that we have proposed in respect of the health requirements for non-commercial movements of dogs entering the UK should also be implemented for commercial movements as part of the Balai Directive.

## LEGITIMATE PET MOVEMENT

While PETS has undoubtedly been exploited by unscrupulous puppy dealers, it has also provided considerable benefit for pet owners across the UK, allowing them to easily take their dogs on holiday to Europe with them, as well as making it easy for Europeans and expats to visit the UK with their pets. For many who take part in dog activities such as showing and dog agility, PETS has facilitated this, while also making it easier for European counterparts to compete in UK events. Any reform of pet travel should balance the pros and cons of the existing system.

### WE ARE CALLING ON AN INCOMING GOVERNMENT TO:

- To work with the European Union, regardless of the outcome of Brexit, to amend both non-commercial and commercial pet travel rules to better protect both the canine and human population





THE KENNEL CLUB

