

Senedd Cymru
Y Pwyllgor Newid Hinsawdd, Amgylchedd
a Materion Gwledig
Ymgynghoriad ar effaith argyfwng
Covid-19
CCERA(5) CP 26
Ymateb gan RSPCA Cymru

Welsh Parliament
Climate Change, Environment and Rural
Affairs Committee
Consultation on the impact of the Covid-19
pandemic
CCERA(5) CP 26
Evidence from RSPCA Cymru

RSPCA response - impact of the Covid-19 pandemic on animal welfare in Wales

DECEMBER 2020

RSPCA Cymru welcomes the opportunity to respond to the Climate Change, Environment and Rural Affairs Committee's into the impact which Covid-19 has had on the animal welfare sector in Wales.

This response aims to highlight some of the significant challenges faced by both the RSPCA, the sector and for animal welfare in general - and some steps the Welsh Government can take to support the sector and animals as the unprecedented challenges arising from tackling the virus persist.

Undoubtedly, the coronavirus pandemic has had a seismic impact on the RSPCA and animal welfare in general - placing numerous challenges on the organisation; including financial, procedural and in terms of the support we offer members of the public in Wales, and to animals generally.

Additionally, it has created new issues for animals - including restrictions on animal-related activities, greater risk of abandonment amid the anticipated economic downturn, but also an evidence of increased trends towards buying pets - including puppies - amid lockdowns, and a reduction in people's normal activities.

The period has also raised further unintended consequences - such as what activities related to animal welfare should be regarded as essential; while also highlighting the vital role played by RSPCA officers and their necessity on the frontline responding to animal-related emergencies, even in the most unprecedented period of the first nationwide lockdown.

Crucially, with 47 percent of households in Wales owning an animal¹, and many millions of agricultural animals based in Wales², it is clear that any impacts to animal welfare from the outbreak will impact many, many people in all corners of Wales. As such, we warmly welcome this consultation's specific focus on the impact the pandemic has had on animal welfare, and we would be delighted to provide any further information which may be of interest to the Committee.

¹ Welsh Government - National Survey for Wales 2014 - 2015, Pet Welfare

² Welsh Government - Statistics for Wales, Farming Facts and Figures, Wales 2020

Financial support

The economic consequences of the pandemic are yet to be realised, but it is widely feared that Wales and the rest of the UK faces the prospect of the biggest financial downturn of a generation. It is highly likely this will place added pressure on the strained resources of the animal welfare sector - with the prospect of increased levels of abandonment of animals, or people being unable to afford to hold onto their animals.

Given this reality, the RSPCA continues to call on the Welsh Government to provide specific financial support for the animal welfare sector in recognition of this added strain, the vital services they provide, and the role they so often play in relieving pressure on public bodies like the Police and local authorities. Schemes like the Third Sector Covid-19 Response Fund - comprising the Third Sector Resilience Fund and the Voluntary Services Emergency Fund - and small charity support grants are welcome examples of support which have made funding opportunities available to some animal welfare groups, and a specific scheme could act as a more wide-ranging lifeline to a sector that already relieves much strain on public, statutory bodies like the Police and local authorities.

A survey of members of the Animal Welfare Network for Wales (AWNW) showed 71 percent of organisations calling for grants to be made available to animal rescue centres following the pandemic³.

It should be noted that the UK Government's furlough scheme proved pivotal for the RSPCA; offering a significant funding lifeline - which was also utilised across the animal welfare sector in Wales, and elsewhere in the UK. Across England and Wales, the RSPCA furloughed almost one quarter - 23 percent - of the workforce. While many RSPCA operations remained key during the pandemic, other activities of course declined - meaning the ability to furlough staff offered a vital source of income for the RSPCA, and economic security for many employees. Beyond just Wales, 52 percent of rescues in an Association of Dogs and Cats Homes (ADCH) and National Equine Welfare Council (NEWC) survey were found to have reduced staffing levels by using the UK Governments' furlough scheme; 12 percent by over half pre-lockdown staff levels⁴. Support for the furlough scheme was widespread across the animal welfare sector - and a survey of AWWN members found 43 percent had called for its extension⁵; something which has now been announced by the UK Chancellor of the Exchequer Rishi Sunak.

Worryingly, at a UK level, the seven major animal rescues⁶ have budgeted a 33% drop in income in 2020 due to lack of opportunities for public fundraising such as events, street and door to door activities - further emphasising the importance of dedicated funding amid the possibility of stretched resources on these and other animal welfare groups as the social and economic consequences of the pandemic, and their consequences for animals, become clearer.

³ Survey of Animal Welfare Network for Wales members. Approximately one third of members responded

⁴ ADCH / NEWS survey - Impact survey of Coronavirus on animal rescue organisations in eight jurisdictions in the UK and Ireland, 2020

⁵ Survey of Animal Welfare Network for Wales members. One third of members had responded by mid-May 2020.

⁶ RSPCA, SSPCA, Blue Cross, Cats Protection, Dogs Trust, PDSA

Animal welfare advice

Almost half of all households in Wales own a pet, and the pandemic has proven an uncertain time for them. Indeed, the RSPCA was inundated with queries from members of the public on issues as diverse as hygiene measures, what governmental restrictions allowed in terms of animal care and what animal-related services would be allowed to continue during national and localised lockdowns.

RSPCA Cymru was pleased to work closely with colleagues in the Animal Welfare Network for Wales (AWNW) on the production of, and dissemination of, key protocols and guidance to support animal-related businesses throughout the pandemic - based in part on guidance produced in England by the Canine and Feline Sector Group (CFSG). This included a handover protocol, rehoming guidance and support for specific types of animal-related businesses - such as dog groomers, professional walking services and pet shops. We very much welcomed the Welsh Government's decision to point to this guidance⁷ - and the AWNW has endeavoured to keep this updated amid fluctuating restrictions, particularly the recent two-week fire-break lockdown.

Indeed, updating and refreshing the guidance for the fire-break was a positive example of swift, joined-up working between the Welsh Government and a sector council. Given its production by the sector, this guidance was understandably more detailed, thorough and relevant to specific circumstances than earlier, more general pet-related guidance produced by the Welsh Government. We would therefore urge the Welsh Government to continue to work closely in partnership with interest groups and sector councils when producing any such guidance in future - prioritising an approach that readily signposts to relevant guidance produced by the sector themselves.

Pet ownership trends

There is some evidence that there was an increased interest in the adoption or purchase of pets during Covid-19 restrictions; likely due to people spending far more time at home and feeling in a greater position to make such an acquisition for their household or family.

During ongoing Covid-19 restrictions, UK-based Google searches for 'Puppies near me' increased more than six times (650%) with 15,000 searches in July 2020 compared to 2,000 in January 2020. The figure was also five times higher than the same month last year (July 2019).

Meanwhile, there is also concern that a rise in interest for puppies may surge importation numbers which is a potentially exploitative and damaging trade which can cause life-long suffering to dogs. UK Government figures show the number of licences - or Intra Trade Animal Health Certificates - issued for the commercial import of dogs more than doubled from 5,964 (June - August 2019) to 12,733 for the same three-month period this year. Each licence could have anything from 1-150 dogs on it

It is not clear how this huge increase in puppies impacts on the Wales dog owning market or the supply of puppies Wales generates itself, particularly from west Wales. However, it shows how importers and dealers are able to circumvent the England third party ban and highlights the importance of the Welsh Government accelerating a ban on the third party sale of puppies and kittens in Wales. In particular the Welsh Government must learn from

⁷ Welsh Government website - Animal businesses, rescue and rehoming: coronavirus guidance

the enforcement issues to date in England, and outline how they intend for the legislation to be an enhancement from what the UK Government previously brought forward there. The Welsh Government needs to assess the impact of a third party ban on dog breeding in west Wales, in particular whether it will improve dog breeding standards, lead to evasion of the new rules or result in large scale abandonment of dogs as the businesses potentially face closure. It is concerning, therefore, that the Welsh Government is unable to publish a timetable for this legislation to come forward⁸. It is also concerning that the Welsh Government has no immediate plans to amend dog breeding laws⁹, something the RSPCA urges them to address in our [new dog breeding position paper](#).

Before the coronavirus outbreak, the Welsh Government had already taken steps to run promotional campaigns to highlight the importance of responsible pet purchasing and ownership - including through the 'Paws, Prevent, Protect' initiative launched in December 2019. Given longer-term concerns of an increase in abandoned pets following the pandemic, and the potential continuation of an increased interest in adding an animal to a family in the short-term amid ongoing Covid-19 social restrictions, we would urge the Welsh Government to continue such public awareness campaigns. This should highlight the importance of responsible pet ownership, in addition to encouraging people able to add an animal to their family to consider rescue pets. Campaigns on avoiding pet and puppy scams have been run in Scotland and England for the past two years.

Pertinently, the RSPCA and the wider animal welfare sector are increasingly concerned that as people return to their normal lives beyond lockdowns and restrictions, and the grim economic reality emerges, we could see more animals coming into our care or being abandoned. The sector continues to highlight to anyone looking to adopt or take on an animal the importance of research, and ensuring this is a long-term commitment the household is able to take on beyond the pandemic. Sadly, we're also worried that more families will seek to relinquish pets due to behaviour problems that have emerged due to changes in routines and set-ups caused by lockdown, then subsequently abruptly altered. The RSPCA has already seen an increase in visits to our website from people seeking advice on their dog's behaviour¹⁰.

This situation also serves as a timely reminder as to the importance of legislation being brought forward to increase the maximum custodial sentence available to worst perpetrators of animal cruelty - from six months to five years. Indeed, increasing sentences under the Animal Welfare Act could be a major deterrent on puppy smugglers, who can earn millions a year from the trade. The Welsh Government have stated that they intend for a Westminster law to apply to Wales by proposing a legislative consent memorandum to the Welsh Parliament¹¹; and it is hoped both a UK-based Act and an LCM for Wales will be passed by the respective parliaments as soon as possible. The UK Government has stated their commitment to delivering updated sentencing conditions and it is hoped this will be enacted by Spring 2021. This will act as a deterrent too to those mistreating puppies and potentially fuelling a trade further rejuvenated by coronavirus restrictions and people's new stay-at-home lifestyles.

⁸ Welsh Government - Written Statement: Government Response to the Review of the animal Welfare (Breeding of Dogs) (Wales) Regulations 2014

⁹ Ibid

¹⁰ RSPCA News - Public in Wales urged to remember rescue dogs, as lockdown puppy searches soar, 5 October 2020 ¹¹ Senedd Cymru / Welsh Parliament - Legislative Consent Memorandum - Animal Welfare (Sentencing) Bill. This legislation fell when the UK Parliament was dissolved before the 2019 December UK General Election, meaning this LCM was never voted on by Members of the Senedd.

Frontline operations amid the pandemic

RSPCA officers have remained on the frontline throughout the coronavirus pandemic. Animal cruelty and animal emergencies, of course, did not stop for Covid-19 - highlighting the importance of officers continuing to work with new safety protocols in place.

As a charity delivering a key frontline service, our officers assumed critical worker status in Wales - though, in any future scenario, we would welcome the Welsh Government being more prescriptive about which workers across Wales could gain this status, and what this entitled them to - for example, access to childcare, or to early testing during the earlier stages of the pandemic.

However, calls to the RSPCA's advice and emergency line did modestly decline as people spent more time at home. Amid reduced staffing and to limit unnecessary travel, officers also prioritised calls for those animals most at risk. In Wales, between 23 March 2020 - the day lockdown was announced - and 23 November 2020, the RSPCA dealt with 5,935 incidents; compared with 12,348 incidents for the same time period the previous year - a decrease of approximately 52%¹¹ (*full local authority breakdown follows - see appendix one*).

The rehoming of animals by the RSPCA paused for approximately two months at the start of the pandemic in Wales; before resuming on May 15 after guidance was published by the AWW. Once again, this was a strong example of a sector-led response to the coronavirus restrictions; ensuring guidance covered all practical problems likely to be experienced by members in functioning amid the reality of Covid-related restrictions. These protocols allow rehoming to take place in a Covid-secure manner - placing an emphasis on a largely digital process; while ensuring the handover of animals is socially-distanced and safe.

Clarity of guidance

Animal welfare groups relied heavily on the publication of guidance and FAQ documents from the Welsh Government in seeking to decipher whether certain activities were allowed or not under various stages of the Covid-19 restrictions. However, often this guidance did not give a clear enough interpretation as to whether certain key activities being undertaken by the RSPCA and others in the animal welfare sector were deemed permissible.

Indeed, during the national and fire-break lockdowns, localised lockdowns, guidance in relation to volunteering was not clear - and made specific reference to support for human welfare, or the provision of care or help to a vulnerable person. It was unclear whether those providing a frontline response to animal welfare - for example, the RSPCA's Wildlife Casualty Volunteers who transport sick and injured wildlife to support our frontline inspectorate, would have been allowed to continue to volunteer during these periods. This uncertainty continued in recent weeks - given travel restrictions in place; though, positively, the RSPCA was able to seek clarity from the Wales Council for Voluntary Action (WCVA) that volunteers delivering an essential service could continue to travel cross-border in the same way as paid members of staff.

For some time in Wales, a majority of local authorities found themselves in localised lockdowns - which had a significant impact on RSPCA animal centres in Newport and Upper

¹¹ RSPCA data set - incidents dealt with in Wales between 23 March and 23 November 2019, and 23 March and 23 November 2020

Colwyn Bay, in addition to the Llys Nini branch centre in Swansea. Under these local lockdowns, the Welsh Government stated that pet collection was not considered a justifiable reason for a member of the public to leave or enter a locally-locked down area, unless there were specific animal welfare grounds to do so. However, what animal welfare grounds were considered justifiable to make such journeys was not clear - and we would urge the Welsh Government to provide far more clarity on situations like this. As such, RSPCA centres had to make the difficult decision to only rehome to within their local authority boundary - which staff estimate would only account for around one fifth of usual rehoming. While local lockdowns are no longer the policy being pursued by the Welsh Government, should they return, we would also urge consideration to be given for the pre-arranged outdoor collection of rescue pets to be regarded as essential, permissible travel over Council boundaries - particularly given such collections can be done in a Covid-compliant, safe manner, and on a strict appointment basis.

Unintended consequences

Some unintended animal-related consequences arose from the lockdowns and the restrictions placed on everybody's lives.

As the Welsh Government's response to the pandemic continues, and with a fire-break in January already earmarked as a possibility, we hope prior planning can help ensure such consequences can be avoided, or mitigation given greater prior consideration. We feel these demonstrate the importance of involving the animal welfare sector into any discussions around the ongoing response to the coronavirus pandemic; which would offer an opportunity for these unintended consequences to be discussed at the earliest stage possible.

One such example surrounds the instruction by the Welsh Government to people to not travel for any form of exercise - which had an obvious impact on some dog owners. In many parts of Wales, using their powers under the Anti-Social Behaviour, Crime and Policing Act, a number of local authorities have historically imposed localised restrictions on where dogs can be walked - with dog walking on marked sports pitches often banned altogether. Concerns have long been raised that these Public Spaces Protection Orders (PSPOs) can limit suitable dog walking spots within some communities; and this issue became far more acute amid the Covid-19 restrictions and limits on people's legal right to travel for exercise.

The RSPCA urged local authorities to consider easing any PSPOs for the duration of this instruction to help keep dog walkers in their immediate communities, while boosting the availability of appropriate dog walking spots. With sports activities far less frequent on marked pitches during many of these restrictions, this seems an easy solution to mitigate against the animal welfare and dog behavioural risks posed by people inadvertently not walking their dogs so often in complying with a 'stay local' instruction for exercise.

Furthermore, for the first month or so of the initial nationwide lockdown, guidance stated that horse owners must only visit their horses once daily - but this was later amended; following concerns of unintended welfare concerns for equines as a result of reduced visits.

Sadly, by the nature of the pandemic, at times high levels of people were hospitalised in

Wales with coronavirus. Where people are hospitalised and have not made contingency plans for their pets, it is the responsibility of local authorities under section 58 of the Social Services and Well-being (Wales) Act to make arrangements for pets. However, with local authorities severely stretched during the crisis, it is unclear to what extent they would have had the resources to meet such statutory obligations. As such, to support responsible pet ownership and to take the pressure of local authorities, we would urge the Welsh Government to seek to communicate to pet owners, and other animal keepers, the importance of being prepared and identifying carers for animals if they require sudden hospitalisation or care away from the home.

Recommendations

The RSPCA would make the following recommendations in light of the charity's experiences connected to the pandemic thus far:

- The Welsh Government should introduce dedicated financial support for the animal welfare sector, given the role it plays in supporting statutory authorities and protecting animals across Wales. This would compliment very welcome schemes which have helped charities during the pandemic - including Third Sector Resilience Fund, the Voluntary Services Emergency Fund and small charity support grants.
- During the Covid-19 pandemic, the Welsh Government's close engagement with the Animal Welfare Network for Wales and animal welfare organisations has been welcome - and should continue. We would urge the continuation of emphasis on sector-driven Covid-19 guidance and advice for animal owners and keepers, given the specific and often unforeseen questions which have arisen; and how general governmental advice is unlikely to be specific enough to cover such detail.
- The pandemic has highlighted the importance of unprecedented guidance - for example with regards to critical workers, and what they are eligible for (childcare, early testing) to be as perspicuous and unambiguous as possible to support quick, clear interpretation.
- Guidance on the permissibility of frontline volunteering should be clear amid all stages of Covid-19 related restrictions, including those volunteers who emulate some aspects of paid roles, and travel outside of Wales to help and transport animals in need.
- Information and guidance should be issued to local authorities to avoid consequences of Covid-19 restrictions unwittingly compromising animal welfare wherever possible. This should include relaxation of dog walking PSPOs wherever safe and possible amid 'stay at home' orders, and highlighting how communicating to pet owners about making contingency plans for their animals if hospitalised can reduce the likelihood of Councils being expected to intervene under section 58 of the Social Services and Well-being (Wales) Act to make arrangements for pets.
- Amid a potential surge in interest of adopting puppies - potentially sourced from irresponsible sources - generated by the Covid-19 lockdown, the Welsh Government's should improve and fastrack its work to clamp down on poor puppy trade practices, including by:
 - using its influence to encourage the UK Government to fastrack Chris Loder

MP's Animal Welfare (Sentencing) Bill and ensure it is on the statute books as soon as possible; and bring forward a legislative consent motion to be voted on by the Welsh Parliament to ensure this law applies to Wales too.

- further encouraging the UK Government to support raising the legal age for importing puppies from fifteen weeks to twenty-four weeks
- publishing a timetable for bringing forward meaningful enforceable legislation banning the third party sale of puppies and kittens in Wales
- revisiting their intention to not support all recommendations made by the Animal Health and Welfare Framework's review into dog breeding legislation, by instead prioritising plans to amend the current Animal Welfare (Breeding of Dogs) (Wales) Regulations 2014.

Note: Additional information on the RSPCA's recommendations to Welsh Government concerning dog breeding legislation can be found [here](#).

Appendix 1 - incidents dealt with by RSPCA Cymru, per local authority area

Local Authority	Mar 23 - Nov 23 2020	Mar 23 - Nov 23 2019
Blaenau Gwent	129	275
Bridgend	225	504
Caerphilly	218	588
Cardiff	567	1,349
Carmarthenshire	442	791
Ceredigion	132	278
Conwy	404	673
Denbighshire	310	552
Flintshire	276	577
Gwynedd	235	517
Isle of Anglesey	167	289
Merthyr Tydfil	72	222
Monmouthshire	126	258
Neath Port Talbot	321	623
Newport	276	621
Pembrokeshire	308	541
Powys	249	470

Rhondda Cynon Taf	273	670
Swansea	587	1,146
Torfaen	165	345
Vale of Glamorgan	178	492
Wrexham	275	567
TOTAL	5,935	12,348