



# Cymdeithas Frenhinol Atal Creulondeb i Anifeiliaid Royal Society for the Prevention of Cruelty to Animals

20th June 2013

David Melding AM  
Chair of the Constitutional & Legislative Affairs Committee  
National Assembly for Wales  
Cardiff Bay  
CF99 1NA

Dear David Melding AM,

## **Re: Animal Welfare (Breeding of Dogs) (Wales) Regulations 2013**

As you will be aware, on Tuesday June 11th, the Minister for Natural Resources and Food laid before the National Assembly for Wales draft regulations in relation to the breeding of dogs.

I understand the Constitutional & Legislative Affairs Committee is to consider these draft regulations prior to a motion to approve them in the Senedd on July 2nd. Furthermore, I also understand that it is within the remit of the Committee to deliberate on the merits of the draft regulations.

Whilst we welcome the Welsh Government's decision to bring forward regulations and welcome much of their contents, RSPCA Cymru is very concerned about the Welsh Government's supporting, associated statements which raise serious questions regarding interpretation.

The draft regulations state that one full-time attendant may look after a maximum of 20 dogs, which, although not perfect, RSPCA Cymru broadly welcomes.

However, we are deeply concerned by a discrepancy contained within supporting statements - indicating that this figure excludes any puppies born to those dogs. Consequently, depending on the size of a breeding bitch's litter, one attendant faces the prospect of caring for hundreds of dogs at any one time.

That situation, we believe, would mean attendants will not have the time or resources to ensure dogs have opportunities to express normal behaviour or be handled or socialised appropriately. It would also mean attendants would not have the time to carry out the very duties and requirements outlined elsewhere within the regulations and guidance. Subsequently, therefore, the regulations would fail to guarantee appropriate welfare standards for dogs.

Crucially, however, we believe the content of the draft regulations laid contradicts these supporting statements.

Under Part 3, 8(2)(c)(i), the regulations state the "minimum staff requirement" is "1 full-time attendant per 20 dogs kept" or "1 part-time attendant per 10

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Noddwr Ei Mawrhydi Y Frenhines  
Patron HM The Queen

Is-noddwr Ei Ras Archesgob  
Caergaint  
Vice Patron His Grace  
The Archbishop of Canterbury

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**Chris O'Brien, Public Affairs Manager**

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dogs kept". The regulations do not appear to make any reference to this excluding puppies – unlike the Minister's accompanying Written Statement. The regulations clearly define a puppy as a "**dog** under the age of 6 months" – suggesting that puppies should be included, rather than excluded, from the proposed 1 to 20 ratio.

Clearly, addressing this apparent discrepancy is pivotal in assessing whether these regulations will sufficiently improve guaranteed welfare standards for dogs based in breeding establishments. Therefore, we urge the Committee to look closely at this issue which requires much-needed clarity.

RSPCA Cymru also believes that, should the interpretation contained within Welsh Government supporting statements be judged to be correct, the Constitutional & Legislative Affairs Committee is well-placed to deliver a powerful statement to the Welsh Government stating that these draft regulations are insufficient in addressing the welfare needs of dogs based in breeding establishments.

Should you require any further information, please do not hesitate to get in touch.

Yours Sincerely,

A handwritten signature in dark ink, appearing to read 'C. O'Brien', written in a cursive style.

**Chris O'Brien**  
Public Affairs Manager, RSPCA Cymru

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**Chris O'Brien, Public Affairs Manager**

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