



Licensing of Animal Welfare Establishments, Activities and Exhibits Consultation
Blue Cross Response

Question 1

Do you agree that Animal Welfare Establishments (animal sanctuaries and animal rescue and rehabilitation centres) should be subject to licensing?

Yes

Blue Cross is strongly in favour of the licensing of animal welfare establishments (AWEs). The Code of Best Practice for Animal Welfare Establishments, published in September 2020, was a positive step but its effect was weakened by it being voluntary. We believe that statutory licensing will be a significant step forward in terms of providing legal protection and safeguards for animals, ensuring enhanced welfare standards and promoting best practice in the sector.

While there will be some AWEs with committed and trained staff which provide a good standard of care and do valuable rehabilitation work, there are many which do not resulting in considerable animal health and welfare concerns. The fact that anybody can set up an animal rescue or sanctuary without any formal oversight and despite possessing no qualifications or experience in animal welfare is simply not an acceptable situation. Rescuing and rehabilitating animals and providing them with a high standard of species-specific care is a time-consuming and complex operation. Already in 2024 there have been two prosecutions of owners of rescue centres for keeping animals in appalling conditions. The rescue sector in Wales is also under severe pressure at the moment due to increased costs and the cost-of-living crisis increasing the likelihood of adverse welfare implications for the animals involved.

Licensing AWEs would also make it easier to distinguish between genuine rescue and rehoming centres and back street breeders and third-party sellers trying to bypass laws prohibiting third party sales of puppies and kittens by pretending to be a rescue. We also know that there is a growing

trend for the establishment of 'rescue' centres importing dogs from abroad to sell on to members of the public. Whilst some of these are likely to be genuine, we know that a number of these types of establishments operate as a cover for illegal puppy smuggling.

As a leading member of the Association of Dogs and Cats Homes (ADCH), which has 12 members in Wales, we know that there is already a system in place in terms of membership, standards and inspections which could play a major role in the establishment of any new licensing system. We believe the ADCH standards could be used as the template for any licensing regime, as happened when the Scottish licensing of AWEs came into place in 2021.

For the National Model to achieve its aims, it will be vital that is enforced rigorously, consistently and uniformly. We know that local authorities in Wales are subject to financial constraints and, with the considerable proposed increase in licensable activities, more responsibilities will be placed upon them. Inconsistent enforcement leads to a disjointed and fragmented system which can be exploited by unscrupulous individuals. It is essential that the Welsh Government provides the necessary resources, financial and human, so the National Model can achieve its aims and bring increased professionalisation to the sector. We strongly believe that anyone inspecting animal establishments should be appropriately knowledgeable and qualified in relevant animal welfare subjects.

It will also be essential for a culture of proactive inspections to become embedded in the proposed National Model. When a licensed premise is to be inspected the licence holder will be given advanced warning of this inspection and does not provide a true reflection of day-to-day standards in many instances. The ability to carry out unannounced spot checks and inspections, with adequate resources to do so, would be a great step forward in preventing animal welfare concerns.

We welcome the Welsh Government's commitment to prioritising the licensing of this sector. Any delay in regulating rescues and homing activity potentially compromises the welfare of animals.

Question 2

Do you agree that Animal Activities (human engagement services, doggy day care, dog walking, home boarding, livery services etc) should be subject to licensing?

Yes

Blue Cross is strongly in favour of the licensing of animal activities, such as doggy day care, dog walking, home boarding and livery services. Whenever humans interact with animals in a commercial context there is always a risk that animal welfare will not be regarded as high a priority as making a profit; in fact, animals may well be abused and neglected in the worst cases. The licensing should cover franchise operations as well as individuals.

Dog Walking - dog walkers who are careless and irresponsible could potentially causes serious negative welfare impacts to the dogs in their care. Irresponsible dog walkers can also endanger public safety, cause concern for other dogs and dog walkers and have a deleterious impact on the environment. A statutory licensing system should help to drive up and maintain standards across the dog walking sector, increase transparency and therefore lead to enhanced dog welfare. It will also provide reassurance to dog owners that the walker is subject to a level of inspection and accountability. The Canine and Feline Sector Group (CFSG), of which Blue Cross is a member, has produced a Professional Dog Walkers' Guidelines document which could provide a useful template for the licensing criteria and the statutory guidance.

Dog Grooming - Grooming a dog is essential for his or her welfare – it prevents a dog's coat getting matted, as well as removing dead hair, dirt and dandruff. It is an activity which requires expert knowledge and a high level of skill. Some of the equipment used by groomers, such as drying boxes, have the potential, if used incorrectly or carelessly, to cause serious injury or even death.

As the groomer is responsible for the welfare of a dog when it's in their care it is vital they should adhere to the highest standards. There are currently reputable groomers that are members of trade bodies such as the Pet Care Trust or the British Dog Groomers' Association – but many

do not have any qualifications at all. If effectively enforced, a statutory licensing system should help to drive up and maintain standards across the dog grooming sector, increase transparency and accountability and lead to enhanced dog welfare. It will also provide reassurance to dog owners that the groomer is subject to a level of oversight and inspection.

Animal Boarding Establishments - the 1963 Act is outdated, inflexible and needs to change to reflect how animal boarding establishments operate today. The demand for pet boarding services has increased dramatically since 1963 and society's expectations of good animal welfare have also evolved. Providing accommodation for a loved family pet is a major undertaking and a great responsibility so it should only be performed by people who are capable of meeting the highest standards of animal welfare.

Dog Trainers and Behaviourists – Blue Cross has long advocated for the licensing of dog trainers and behaviourists. The cost-of-living crisis meant that many dog owners could not afford to employ a qualified and reputable behaviourist or dog trainer, such as a member of the Animal Behaviour and Training Council, to help deal with any behavioural difficulties. The animal behaviour and dog training industry is unregulated in Wales meaning anyone with no experience or qualifications can set up as an expert dog trainer or behaviourist. This regulatory gap has been exploited by unscrupulous and inexperienced dog trainers who increasingly purvey bad, even dangerous, advice on social media; for instance, advocating quick fix solutions and punishment-based training which dogs can find stressful and unpleasant.

Animal Assisted Interventions (AAI) - There has been an increase in the number of establishments and businesses providing animal-assisted therapy in recent years. While these activities can have beneficial effects for the people, there are concerns about the welfare of the animals involved and we believe there is also a need for statutory regulation of this sector to provide some oversight and accountability.

There has, for instance, been an increase in the number of establishments providing equine assisted services or therapy in recent years, some of whom include riding, handling and grooming a horse as part of the programme. The Welsh Government could collaborate with The Federation of Horses in Education and Therapy International (HETI) on

the licensing criteria and training for inspectors. The National Equine Welfare Council (NEWC) Equine Industry Welfare Guidelines Compendium (which is currently being updated) should also provide a useful template. Blue Cross is a member of NEWC.

Another possible template is the Society of Companion Animal Studies (SCAS) code of practice for AAI produced in 2019 which details how to protect the welfare of the animals involved. Any statutory regulations must stipulate a robust system for measuring the animals wellbeing both before, during and after the visit.

Livery Yards - the ability to set up and run a livery yard and make a commercial profit without possessing any relevant experience or qualifications to do so is outdated and poses an unacceptable risk to equine welfare. Horses are sentient animals with complex health and welfare needs and need competent, conscientious and knowledgeable people to be in charge of their care. If effectively enforced, it should help to improve the health and welfare – physical and mental - of equines in these establishments, ensure uniformity and consistency of welfare standards across Wales, and improve transparency and accountability. Horse owners who use livery yards will also feel reassured that there is some oversight of the standards and that the welfare of their horses is being monitored and protected.

There are a number of problems with unlicensed livery yards, including:

- inadequate/ inappropriate housing/stabling/shelter
- lax biosecurity measures leading to an increase in the risk of infectious diseases, such as equine influenza and strangles. Horses travelling into and out of the yard pose a risk of transmission without stringent biosecurity measures being rigorously enforced;
- unsafe, inadequate and badly maintained fencing. Safe and secure fencing is essential, to prevent injury to horses and to minimise the risk of straying. It can also increase the risk of accidents and theft;
- lack of suitable and well-maintained grazing and foraging opportunities;
- inexperienced and high turnover of staff providing poor standards of care due to a lack of necessary level of equine knowledge.

Many yards enforce periods of no turn out - particularly in the winter months - which can prevent the horse expressing its natural behaviours, such as free movement and play, grazing and enjoying the company of other horses. Horses are highly social, herd animals, and need compatible equine companionship. This can have detrimental effects on the health of the horse, both physical and mental. Horses can suffer boredom and anxiety leading to repetitive behavioural abnormalities, or stereotypic behaviours.

It will be essential that livery yards are only awarded a licence following an inspection by a person with suitable experience and qualifications in equine health and welfare. It cannot simply be performed by a general licensing inspector. We recommend the Welsh Government works collaboratively with the National Equine Welfare Council (NEWC), of which Blue Cross is a member, on the details of the scheme to ensure the latest equine knowledge is utilised effectively. NEWC has clear standards through its Equine Industry Welfare Guidelines Compendium (which is currently being updated) which should provide a useful template.

Riding Establishments - Blue Cross supports riding establishments being brought under the scope of the licensing framework as the 1964 Act is outdated and needs to change to reflect the riding establishments of today. If enforced effectively, it should help to improve and protect the health and welfare of equines and provide greater oversight, transparency and accountability than the current legislation. This proposal would also bring Wales into line with England where riding establishments have been licensed since 2018.

It will also be essential that the riding establishments are only awarded a licence following an inspection by a person with suitable experience and qualifications in equine health and welfare. It cannot simply be performed by a licensing inspector who may not recognise the signs of equine pain or distress.

Carriage Rides - Blue Cross also believes carriage rides should be included in the scope of the licensing system as they can have severely detrimental welfare consequences for the horses due to daily exposure to noise and pollution, heavy traffic, hard pavement, long workdays, constant heavy loads, lack of access to water and pasture, extreme weather leading to heat stroke, potential for injury and exhaustion.

Puppy Yoga and Cat Cafes - Blue Cross is seriously concerned about the health and welfare of puppies and cats involved in these activities. We believe they are based purely on people's entertainment and the potential profit to be made. An ITV News investigation of puppy yoga studios revealed puppies as young as six weeks old being denied access to water, sleep and worked for hours at a time – this is completely unacceptable. Puppy yoga is not a substitute for an educational socialisation class and puppies and adult dogs may be at risk of learning inappropriate behaviours. Puppies of this age are learning all the time and need routine, structured socialisation to develop into a well-rounded adult dog. While a single yoga class may not cause long-term behavioural issues, if the puppy learns through repeated classes they can act as they like they are likely to have behavioural issues in later life. We always urge puppy owners to find alternative activities to enjoy with their puppy. Cats are solitary animals who do not live in social groups so bringing together large numbers of cats in a confined space could cause extreme stress and compromise welfare.

Blue Cross would not recommend or endorse any activities that exploit pets for human enjoyment without first considering their needs. There are considerable health and welfare concerns associated with both activities so, ideally, Blue Cross would prefer the Welsh Government would take steps to ban them altogether. We do not want the imprimatur of a license to somehow normalise these activities or lead to an expansion of their presence in Wales. However, we believe licensing puppy yoga and cat cafes would be a step forward as it would provide more transparency and accountability. To ensure this, it will be essential that the licence conditions and any guidance should be as rigorous and comprehensive as possible; for instance, people involved should have some form of animal welfare training or qualifications. We would also urge the Welsh Government to keep this under constant review and should act if licensing is not safeguarding the animals involved.

Question 3

Do you agree that a licensing scheme be introduced to strengthen existing legislation re animal exhibits i.e. people who take animals to

parties such as reptiles, birds of prey centres or other travelling and static animal exhibits?

Yes

Mobile Animal Exhibits - Blue Cross welcomes the Welsh Government's proposals to license animal exhibits in Wales. The legislation in Wales – the Performing Animals (Regulation) Act – dates from 1925 and is therefore completely outdated and needs to reflect the increase in animal exhibits.

Blue Cross is concerned that mobile animal exhibits (MAEs), petting zoos and pony parties can cause considerable health and welfare problems for animals:

- The regular handling of animals, some of whom belong to wild, rather than domesticated, species can cause stress or injury and animals can bite, scratch or otherwise injure children during handling experiences.
- Some of the animals may experience stress and discomfort due to being exhibited in unfamiliar and noisy surroundings.
- Due to the difficulty in recognising the same reactions in different animal species, exotic animals such as reptiles and birds used during displays and parties may be stressed or frightened without us being aware.
- Regular transportation is a known cause of stress for animals and yet those used by mobile petting zoo companies are transported on a regular basis.
- The potential for transmission of serious zoonotic diseases.

Blue Cross does not believe the MAE or petting zoo environment is conducive to safeguarding the five freedoms of animal welfare and we do not support MAEs visiting educational establishments. Because of these serious welfare concerns, Blue Cross does not rehome animals to any MAEs/petting zoos.

Blue Cross believes there should be a clear and demonstrable education purpose for the use of any animal being exhibited. At no point should an exhibit conflict with messages of respect and understanding of animals and their welfare. We also do not believe that exotic species should ever be displayed for educational or entertainment purposes in the UK.

We believe the licensing system should include system of mandatory annual inspections accompanied by rigorous training and adequate resources for those tasked with inspections. We also call on the Welsh Government to determine accurate figures around the number of animals being exhibited in Wales as this will make it easier to measure the impact of the new regulations.

Animals in educational settings - Blue Cross acknowledges that there are many benefits to children interacting with pets and to teaching them about animal welfare. We know that many teachers in the UK use pets in classrooms to work with children on empathy, behaviour, responsibility and to teach them about nature. However, as with all the activities mentioned in the consultation, there is always concern about the health and welfare of the animals involved: transportation, handling, stressful and noisy environments.

Question 4

Do you agree that owners and/or keepers or trainers of racing dogs (including greyhounds) should be subject to licensing?

No

Blue Cross does not support the licensing of trainers or keepers of greyhounds. We believe that the only option to safeguard greyhound welfare is to introduce legislation that will prohibit the racing and/or keeping of greyhounds for the purposes of racing in Wales.

We are a member of the Cut the Chase coalition. To see our full response, please refer to the Cut the Chase response.

Question 5

We are aware of significant public interest in the welfare of racing greyhounds. Further to the above question on the licensing of owners, keepers, or trainers of racing dogs, we seek evidence to justify or negate consideration of a phased ban in future. Please tick the box which most appropriately reflects your opinion on whether a phased ban should be given consideration. Please provide your submission and reasoning in the box below and indicate whether your submission is either for or against consideration of a future phased ban:

For a phased ban

Blue Cross is calling for a phased end to greyhound racing in the UK, and we believe Wales can be the first nation to bring about a ban. There are significant welfare issues for racing greyhounds at all stages of their lives, both on and off the track.

Our previous engagement with the industry, and the failure of regulation to make any meaningful change to the racing greyhound welfare in England is why we are clear that anything other than a phased ban will not deal with the welfare issues faced by racing greyhounds in Wales. The only way to protect these greyhounds from the inherent risk of racing is an end to the industry.

Our call to end greyhound racing is a priority for Blue Cross. Because of this we launched our "[Don't Race, Embrace](#)" campaign. It highlights the welfare concerns associated with the greyhound racing industry and shows that greyhounds can make wonderful pets and are so much more than just 'bred to race'. We have a petition open calling on the UK governments to phase out greyhound racing, so far nearly 3,000 supporters in Wales have signed our petition.

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