Blue Cross Written Evidence to Environment, Food and Rural Affairs Select Committee Inquiry into Pet Welfare and Abuse April 2023

Blue Cross is one of the UK's leading pet charities and celebrated its 125th anniversary in 2022. Our purpose is to help pets and people thrive together. To achieve this, we help pets and people in need, improve knowledge and understanding of good pet welfare and work to make pets a more valued part of society, As part of this, we offer free veterinary treatment to pet owners on low and reduced incomes, provide free microchipping services at our animal rehoming centres, animal hospitals and clinics and last year set up Pet Food Banks for people struggling to feed their pets. In 2022, 24,204 pets were helped by our veterinary services and 4,003 pets by our rehoming and fostering services. 49,365 people were reached by our Education service and 17,355 calls, emails and webchats were answered by our Pet Bereavement Support Service (PBSS).

Blue Cross has confined its answers to questions 4 (a), 5, 6, 7 and 8. We have submitted an annexe containing pet food bank case studies. We are also signatories to the Canine and Feline Sector Group (CFSG) response to Question 2 and the Dog Control Coalition response to Question 8.

Ownership and animal welfare

- 4. There was a marked increase in pet ownership during the pandemic.

 What is the situation for companion animals' welfare post-pandemic,

 especially given recent factors such as a) adverse changes in the cost of living?
- **4.1 a) Cost of Living**: The entire animal welfare sector is warning that the cost-of-living crisis is having severe impacts on pets and their owners, causing high levels of stress and anxiety for many people across the country. In January 2023 we surveyed 2,000 pet owners in England to find out more about how the cost-of-living crisis is impacting them:
 - 35 per cent of pet owners said the combination of having a pet and cost of living pressures have made life very stressful and tiring. This

- rises to 53 per cent for pet owners currently claiming means-tested benefits
- 40 per cent of pet owners said the combination of having a pet and cost of living pressures have made them feel anxious. This rises to 58 per cent for pet owners currently claiming means-tested benefits
- 44 per cent of pet owners said the combination of the cost-of-living crisis and owning a pet have caused increased financial pressures. This rises to 57 per cent for pet owners currently claiming benefits.
- 4.2 Our survey has shown that for some pet owners the cost-of-living crisis has put them into the dreadful position of having to consider giving up their pet for rehoming or in some cases having their pet put to sleep:
 - 14 per cent of pet owners were forced to give up a pet because of costof-living pressures
 - almost a quarter of pet owners claiming benefits have recently had to give up a pet as a result of financial difficulties
 - over 10 per cent of owners would consider having their pet euthanised due to financial pressures. This rises to 28 per cent for owners currently claiming means-tested benefits.

4.3 **Pet Food Banks** (case studies in annexe):

Our survey found:

- Over 20 per cent of pet owners are not in a position to pay for pet food in the next three months. For pet owners claiming means-tested benefits this rises to 25 per cent
- Over 50 per cent of owners have changed the food they give their pet recently to a lower cost option
- 15 per cent of pet owners surveyed had had to use a pet food bank in the last six months.
- 4.4 Blue Cross recognised the need for assistance amongst struggling pet owners, so we have established 14 pet food banks and have partnered with other organisations around the UK to provide pet food at nearly 200 human

food banks across the country. From October 2022 we have fed a day's worth of food to over 870,000 pets. Over the next few months, we will be working with every Pets at Home store in the UK – over 400 – to collect food and distribute it to local food banks; at the time of writing 213 stores have a Blue Cross donation bin. We know how critically important this scheme is as it helps to keep the pet with the family. This not only benefits the health and welfare of the pet but also helps to reduce pressure on an already overstretched animal rescue sector.

4.5 **Dog Behaviour**: Blue Cross behaviour experts believe the Covid pandemic and the subsequent cost of living crisis have both had significant impacts on dog behaviour. New owners often took the decision to purchase a pet dog, often online, without undertaking adequate research and, as a result, made a poor choice of pet for their particular circumstances. Our behaviourists experienced an unprecedented number of complex cases as a result of the pandemic and the lockdowns, predominantly as a consequence of pet dogs missing essential socialisation due to the restrictions. This led to dogs experiencing issues such as wariness of strangers, noise sensitivity and intolerance of being handled. These behavioural problems have caused immense difficulty and distress to many owners. The cumulative impact of the restrictions and the lack of access to the right kind of behaviour and training support has led to a significant cohort of dogs exhibiting challenging and problematic behaviour and charities such as Blue Cross are now dealing with the consequences: in 2019 our behaviour team carried out 583 consults on dogs in our rehoming centres, in 2022 this rose to 730.

4.6 The cost-of-living crisis has, in turn exacerbated the problems as many owners can no longer afford to employ a qualified and reputable behaviourist or dog trainer, such as a member of the Animal Behaviour and Training Council¹, to help deal with the behavioural difficulties. Our survey found that over 25 per cent can't afford to pay for the cost of behavioural training for their pet in the next three months. The animal behaviour and dog training industry is unregulated in the UK meaning anyone with no experience or qualifications can set up as an expert dog trainer or behaviourist. This regulatory gap has

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¹ https://abtc.org.uk/

been exploited by unscrupulous and inexpert 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. This can then make the situation worse and lead to increased suffering for the animal. Research by Blue Cross found that only 8 per cent of people have sought pet behaviour advice from qualified behaviourists, while 22 per cent admit they have instead relied on YouTube channels and TV programmes.²

- 4.7 This has knock on effects for relinquishment and rehoming rates. Dogs with multiple unresolved problems are being relinquished because their owners can no longer cope with the dog's challenging behaviour. The Association of Dogs and Cats Homes (ADCH) Blue Cross is a member reported 70% of member rescues surveyed have recorded an influx of dogs with behavioural issues³. However, because of those very problems, it becomes very difficult to rehome the dogs, so a logiam is created.
- 4.8 **RECOMMENDATION**: Blue Cross urges the Government to publish a consultation on the regulation of dog behaviour and training services.
- 4.9 Allied to this are the concerns around the expense involved if the dog, or any pet, needs veterinary treatment. The average cost for vet treatment if a pet is involved in an accident is over £600 for a cat and over £700 for a dog. Our polling found:
 - 62.9 per cent of people surveyed thought vet costs had increased recently
 - Over 30 pr cent of pet owners are not in a position to pay for an unexpected vet cost if it occurs in the next 3 months
 - Almost 20 per cent of pet owners surveyed had had a vet bill in the last three months that they couldn't afford to pay. This rises to 37 per cent for pet owners currently claiming means-tested benefits.

² https://www.bluecross.org.uk/press-release/problematic-pet-behaviour-sees-concerns-over-aversive-training-methods

³ https://adch.org.uk/the-association-of-dogs-and-cats-homes-adch-warns-the-rising-cost-of-living-is-leading-to-an-animal-welfare-crisis/

The dangerous consequences of pet owners being unable to afford procedures such as vaccinations can include increases in the prevalence of potentially fatal diseases such as parvovirus. In 2023, Blue Cross has already performed emergency care on 23 parvovirus cases at our animal hospital in Victoria, London – 9 of them sadly died. Just three parvovirus cases were seen by the charity in the same period last year.

4.10 **Horses**: Horse owners are also struggling in the current financial climate and they may be particularly vulnerable due to the considerable expense involved in keeping equines. Blue Cross has recorded an increase in the number of requests to take in horses due to the owner's financial situation: in 2022, 15 per cent gave this reason; thus far, in 2023 it is 26.5 per cent. More than 5,800 horse owners also took part in our Big Pet Census 2022. The results showed:⁴

- 55 per cent of the participants who own a horse are worried about the cost of vet bills
- 52 per cent are concerned about the rising costs of owning a horse
- 30 per cent are worried about the cost of insurance.

4.11 The costs of many aspects of horse ownership, in particular feed, bedding and veterinary costs, have increased: an online survey of over 8,000 horse owners and keepers by the National Equine Welfare Council (NEWC) — Blue Cross is a member - found that 70.7 per cent of respondents had seen a significant increase in food, forage and bedding costs in the last year. Another worry is that horse owners are potentially missing routine treatments such as vaccinations, dentals and hoof care due to cost and this could have welfare implications for the horse — the survey showed 23.4 per cent had seen a significant increase in routine care costs. Asked how they were feeling about the financial situation with regard to horse care over the next six months, 52.8 per cent said they were slightly concerned and 11.4 per cent were extremely concerned. 33 per cent of respondents said they were considering reducing expenditure on horse care.

⁴ https://www.bluecross.org.uk/all-about-horses-and-ponies

4.12 **Rabbits**: Blue Cross is seriously concerned about the unprecedented crisis afflicting the pet rabbit population – estimated at 1 million⁵ - at the moment. This situation has been likely caused by a number of factors: rabbits breed very easily - they can reproduce from as early as 4 months old and females can become pregnant again straight after giving birth. Their reproductive capabilities are thought to not be well understood by owners, so accidental litters can occur leaving many inexperienced owners quickly overwhelmed and unable to care for them. Blue Cross is urging owners to correctly sex their rabbits and neuter at the right time to avoid this from happening. Also, despite increased education, rabbits are still thought of as cheap and easy pets, whereas they are in fact complex animals who need a large space (which can be very expensive to purchase) and very specific care in order to meet their welfare needs. The inability to afford suitable housing can lead many rabbits to endure cramped, inadequate conditions leading to considerable health and welfare issues.

4.12 Sadly, we have seen a subsequent dramatic increase in relinquishments and abandonment - by the end of 2022, Blue Cross was seeing up to 95 calls a month from people needing to give up their rabbits, the highest figure we have ever known. The rate at which homeless rabbits – including many pregnant females and babies – are coming into our care means we're struggling to find them all the homes they need. The length of stays for rabbits is increasing and we believe this is because more of them are having complex dental issues that take veterinary intervention before they can be rehomed. The average length of stay for a rabbit in 2021 was 38 days; in 2022 this rose to 47 days. The number of people coming forward to adopt rabbits is also at an all-time low, while rabbit breeding and selling has continued to rise. We are also concerned about the increase in rabbits selectively bred for extreme features, such as flatter faces (brachycephaly). It is well known that brachycephalic breeds are more likely to suffer with painful dental issues and Blue Cross feels more emphasis needs to be placed upon breeding for health and welfare, rather than appearance.

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⁵ Pet Food Manufacturers' Association (PFMA): https://www.ukpetfood.org/information-centre/statistics/uk-pet-population.html

- 4.13 To help address this rabbit welfare crisis, Blue Cross, along with other members of the animal welfare sector, such as the RSPCA, Raystede Centre for Animal Welfare, and the Wood Green Pets Charity, is supporting the Rabbit Association and Welfare's (RWAF) call for breeders to temporarily suspend their activities and for a nationwide amnesty on the sale of new rabbits in order to help reduce the numbers of unwanted rabbits left needing accommodation at rescues and animal centres. The websites Preloved and Gumtree have also joined the campaign.
- 4.14 **RECOMMENDATION**: Blue Cross supports a system of registration and licensing that would cover rabbit breeding under The Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018.

5. What are the pressures currently facing those dealing with companion animal welfare including

a. the veterinary sector?

5.1 Blue Cross operates four animal hospitals, three in London and one in Grimsby. There are a number of factors which have combined to place significant pressure on Blue Cross veterinary services. These include the consequences of the Covid pandemic, the challenges in recruitment being felt across the veterinary sector, and an increase in pet ownership. We provide free veterinary services to pet owners on low and reduced incomes – those affected most acutely by the cost-of-living crisis - and demand for these services is increasing as more people face financial difficulties. A national shortage of veterinary staff, including veterinary nurses, has meant Blue Cross clinical teams have not been fully staffed at any point over the last two years. The pandemic and the aftermath of Brexit clearly had an impact: many of our staff came from EU countries and have now returned home. Our Pet Care Clinics, run in partnership with private veterinary practices, experienced multiple challenges as a result of Covid-19, Brexit and a veterinary professional recruitment crisis.

b. the charitable animal welfare sector?

5.2 There is no doubt that the charitable animal welfare sector as a whole is under increasing pressure. Costs are rising faster than charities can raise

voluntary income and the number of volunteers is falling. This is putting many charities under increasing pressure as they deal with rising demand for their services with less income. ADCH members have reported seeing an increase in animals coming into their care with many centres already full and others close to capacity, as rehoming slows down and more people are looking to relinquish their pets. Dog welfare, for instance, undoubtedly suffers if they are kept in kennels for long periods of time due to lack of rehoming opportunities.

- 5.3 In 2022, Blue Cross had 9,936 admission requests on our first response line from people looking to give up their pets. In January 2023 we saw a 178 per cent rise in the number of admission requests from the previous year showing the impact of the cost-of-living crisis. Blue Cross is also seeing increasing numbers of puppies and kittens needing to be rehomed. In 2021 we had 404 puppies and kittens at our rehoming centres and in 2022 this had risen to 657. Whilst younger animals can be easier to rehome, they take a lot of staff resource in terms of meeting their welfare and training needs.
- 5.4 Euthanasia rates are sadly also increasing for dogs because we are seeing more dogs with complex behaviour and medical issues. In 2021, euthanasia rate for dogs was 5.69 per cent and in 2022 this had risen to 7.41 per cent. This is concerning both for the welfare of dogs but also for the welfare of our staff who can find it incredibly distressing to see increasing numbers of animals euthanised. It can lead to burnout and compassion fatigue and is ultimately one of the reasons we believe we are having a high turnover of staff in our rehoming teams.

Current preventative measures

- 6) Is the current regulatory and legal framework to both support the welfare and prevent the abuse of companion animals fit for purpose? Do the available penalties and the probability of prosecution act as a sufficient deterrent?
- 6.1 **Animal Welfare (Sentencing) Act 2021**: Blue Cross welcomed the Animal Welfare (Sentencing) Act 2021 and the increase in the maximum sentence for certain animal cruelty offences to five years and/or an unlimited fine. However, Blue Cross was deeply disappointed that the Sentencing Council consultation on the draft guidelines for the new offence recommended a

range of 1 years 6 months to 3 years for Category 1 High Culpability offences. As one legal article stated:⁶

"what it means - if implemented – is that even under the 2021 Act, it would take an exceptional case for a court to impose a sentence anywhere near the five years."

With many sentences below two years being suspended and guilty pleas resulting in an automatic reduction by a third of any custodial sentence imposed, it will mean that too many perpetrators will not even receive a custodial sentence. We strongly believe that this does not adequately reflect the stated intent and purpose of the Act, and will not aid its deterrent effect.

6.2 **Enforcement:** The main theme which connects many of the current pet welfare issues is enforcement. Animal welfare legislation needs to be consistently, comprehensively and robustly enforced if it is to achieve its statutory aims and act as a deterrent to those seeking to circumvent the law. This duty principally falls upon local authorities (LAs) and the police. However, the ability of local authorities to perform all the regulatory activities is severely constrained by a lack of specialist knowledge, both of animal welfare and the legislative framework; a dearth of continuous training and development; inadequate and variable resources; and inconsistent data collection and analysis - similar problems also affect police forces. This can lead to inconsistency and a 'postcode lottery' as some LAs prioritise animal welfare while others don't. Blue Cross recognises that the current financial climate is challenging with significant pressures on levels of public expenditure – but if enforcers cannot meet the statutory duties then the risk is that the law itself will fall into disrepute and perpetrators will become emboldened to ignore regulations.

⁶ 'Will new sentencing guidelines for animal welfare offences result in more prison sentences?', Samuel March, Advocates for Animals, June 2022 https://www.advocates-for-animals.com/post/will-new-sentencing-guidelines-for-animal-welfare-offences-result-in-more-prison-sentences

7) Will the Animal Welfare (Kept Animals) Bill (as currently drafted) take a significant step to tackling poor pet welfare and abuse, including those issues stated above?

- 7.1 Blue Cross broadly welcomed the introduction of the Animal Welfare (Kept Animals) Bill, although we do have some concerns about the practicality and feasibility of the primates licensing scheme. The extremely protracted and wholly unexplained hiatus in the Bill's progress is a matter of significant concern and bewilderment across the animal welfare sector. The Bill has predominantly cross-party support so could reach the statute book in just a few weeks. We urgently need clarity from Defra on its commitment to the Bill and some indication as to when it will recommence its parliamentary journey.
- 7.2 **Dog theft**: Blue Cross warmly welcomed the Government tabling of the new clauses on taking a dog without lawful authority. We have always argued that the status of pets such as dogs is fundamentally different from 'property'; they are not inanimate objects, they are sentient creatures and irreplaceable members of the family and should be treated as such. We also welcome the proposed maximum sentence of five years imprisonment. This reflects the gravity of the offence and the devastating emotional impact on both the owner and the stolen dog. It also aligns with the maximum sentence provided for by the Animal Welfare (Sentencing) Act 2021. Both sentences should send a strong message that society does not tolerate any form of cruelty to animals.
- 7.3 As currently drafted, powers are granted to Ministers to extend the offence to other species. Blue Cross is disappointed that the Government has not widened the offence to include other pets, such as cats, on the face of the Bill. It seems obvious that cats are "commonly kept as pets." From its long experience with pet owners, Blue Cross knows that most owners have just as strong an emotional attachment to species such as cats as they do to dogs. We recognise that the theft of cats is not as widespread a problem as theft of dogs but it is still a major problem: Blue Cross Freedom of Information requests to 45 police forces (30 responded) in the UK have found that the number of stolen cats recorded rose from 328 in 2019 to 470 in 2021, an alarming 43 per cent increase. The Metropolitan Police recorded a 100 per cent increase; West Yorkshire a 62 per cent increase. Pet Theft Awareness's

'Cat Theft Report 2022' also showed recorded cat theft crime up by 40 per cent on a like-for-like basis, with the annual total more than quadrupling between 2015 and 2021.⁷

- 7.4 **RECOMMENDATION**: Blue Cross would support an amendment to include other commonly owned domestic pets, such as cats, in the scope of the offence. If these species are not included on the face of the Bill, we need more information and timelines from Defra on how the evidence that "animals of that species are capable of forming bonds with people who keep them", as the Bill currently states, will be conducted and evaluated.
- 8) What additional measures should the Government take to stop bad practices, improve overall domestic pet welfare, and assist those involved in supporting domestic pet welfare?
- 8.1 **Responsible Dog Ownership**: Blue Cross recognises that irresponsible dog ownership and dog control issues can be a major problem in local communities causing problems for other residents and pet owners. Responsible dog ownership is an essential aspect of effective dog control and has positive impacts on the dog's health and welfare. Blue Cross currently runs a Responsible Dog Ownership Course (RDOC) with the aim of supporting dog owners and their dogs at a critical point, reducing reoffending and increasing safer communities. It is available for anybody aged over 18 who has committed a suitable low-level dog related offence, including aggravated and non-aggravated Dangerous Dogs Act 1991 section 3 cases. Offenders may be offered the course through advisory action, conditional caution, community resolution or other pathways of restorative justice. Partners have also had some success with voluntary recommendations for earlier intervention. RDOC has been conducted in collaboration with West Midlands. Police since 2019 and South Yorkshire Police since 2022. In 2023 Blue Cross expanded RDOC and promoted the intervention to other areas and have secured another five partners and are in conversations with a number of other potential partners. In 2022 we received 53 referrals; to highlight the scale of need, so far in 2023 we have already received 31 referrals.

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⁷ https://pettheftawareness.blogspot.com/2022/03/the-cat-theft-report-2022.html

- 8.2 RDOC has currently recorded 0 per cent reoffending rates and we are implementing a new impact measurement framework to evaluate attitudes to look at any longitudinal attitude and behaviour change. Ultimately, the aim is to expand the RDOC course nationwide to reduce dog related incidences and reoffending, increase safer communities and improve dog behaviour and welfare for those dogs on a lifetime of restrictions.
- 8.3 **RECOMMENDATIONS**: Government to invest in the nationwide provision of responsible dog ownership courses so it is an option for everyone who commits a low-level dog offence in order to bring down the number of offences nationwide and improve the health and welfare of dogs and public safety. On dog control more generally, we believe reform and consolidation of dog control legislation is long overdue and urgently needs to be repealed and replaced with breed neutral legislation.
- 8.4 **Brachycephalic Pets:** Blue Cross is deeply concerned about the growth in popularity of brachycephalic breeds of dogs (pugs, French bulldogs, bulldogs) and cats (Munchkins, Persians). These breeds suffer from significant inherent health and welfare issues because of their exaggerated conformations: breathing difficulties (Brachycephalic Obstructive Airway Syndrome, BOAS), obesity, recurring skin infections and eye diseases (corneal ulcerations). Research from the Royal Veterinary College (RVC)⁸ has revealed that pugs are almost twice as likely to experience one or more disorders annually compared with other dogs; the breed was almost 54 times more likely to have BOAS. 17 per cent of the dogs Blue Cross took in in 2022 were brachycephalic breeds; in 2023, 25.5 per cent of the dogs admitted so far are brachycephalic breeds. This is one of the reasons why Blue Cross is currently promoting its #EndTheTrend petition⁹ which calls for the UK's leading brands to commit by the end of 2023 to phasing out the use of any brachycephalic pets in their future advertisements.
- 8.5 Blue Cross works to educate both current and prospective owners on the realities of the health issues these animals can face on a daily basis.

 Ultimately, we would like to see an end to the poor breeding of flat faced

⁸ O'Neill et al. (2022) "Health of Pug Dogs in the UK: disorder predispositions and protections", Canine Medicine and Genetics https://cgejournal.biomedcentral.com/articles/10.1186/s40575-022-00117-6

⁹ https://www.bluecross.org.uk/end-the-trend-brachycephalic-petition

animals and a focus on ensuring only those animals with the best conformation are used for breeding. Other European countries, such as the Netherlands, have recently legislated in this area.¹⁰ There are two pieces of UK legislation we believe could be used to address this problem:

- Section 9 of the AWA 2006¹¹ it is clear that many brachycephalic animals do not lead lives free from pain, suffering or disease.
- Schedule 6 (6) (5) of The Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018 states¹²: "No dog may be kept for breeding if it can reasonably be expected, on the basis of its genotype, phenotype or state of health that breeding from it could have a detrimental effect on its health or welfare or the health or welfare of its offspring." Blue Cross believes the enforcement of this law is essential to tackle the poor breeding practices which condemn brachycephalic dogs to a lifetime of suffering.
- 8.6 **RECOMMENDATION**: Defra should commission a wide-ranging review of the health and welfare of brachycephalic pets, including the poor breeding practices associated with the breeds, and the legislative frameworks in other European countries, such as the Netherlands and Norway.
- 8.13 **Shock Collars:** Blue Cross is opposed to the use of any training method that utilises pain or fear to train an animal and prevent an unwanted behaviour from occurring. We believe these training methods are outdated, impact negatively on animal welfare and have no place in 21st century dog training. The most effective way to change and improve a cat or dog's behaviour is through reward-based training; there is no evidence that shock devices deliver better and more effective results than using these methods for training. Further, we know causing pain to a pet can have a detrimental effect on the relationship between owner and pet, can cause animals to become stressed, fearful and anxious, and might also make behaviour issues much worse.

¹⁰ https://www.euronews.com/green/2023/01/23/designer-pets-that-suffer-miserable-health-problems-could-soon-be-banned-in-the-netherland

¹¹ https://www.legislation.gov.uk/ukpga/2006/45/section/9

¹² https://www.legislation.gov.uk/uksi/2018/486/schedule/6/made

8.14 The Scottish Animal Welfare Commission has just published a major report in which it concluded that "the use of e-collars for the training of animals in Scotland should be prohibited in Scotland." The Government has long promised to ban shock collars: a press release as long ago as 27 August 2018 announced that "cruel electronic training collars which are used for dogs and cats are to be banned under new legislation." Defra's Action Plan for Animal Welfare also contained a welcome pledge to "Ban remote controlled electronic training collars ('e-collars'), given their scope to harm cats and dogs."

8.15 **RECOMMENDATION**: We believe abusive training methods compromise dog welfare and are therefore in contravention of the AWA 2006 and we urge the UK Government to bring forward its promised legislation to ban them.

¹³ 'Report on the use of handheld remote-controlled training devices (e-collars) in dog training' – Scottish Animal Welfare Commission, April 2023 https://www.gov.uk/government/news/cruel-electric-shock-collars-for-pets-to-be-banned-2