

A DOG'S LIFE MANIFESTO

Improving dog welfare at every stage of life



THE KENNEL CLUB
Making a difference for dogs

The Kennel Club is the UK's largest organisation dedicated to protecting and promoting the health and welfare of all dogs. Besides being a voluntary register for pedigree dogs and crossbreed dogs, we offer dog owners and those working with dogs an unparalleled source of education, experience and advice on puppy buying, dog health, dog training and dog breeding.

The Kennel Club Charitable Trust (KCCT) is a dog charity that looks after the health and welfare of all dogs. It makes a difference by funding a wide variety of work ranging from supporting research into canine diseases, dog welfare organisations and the promotion of support dogs, all of which give dogs a healthier, happier life.

The Kennel Club Charitable Trust is now registered on easyfundraising.org.uk. For further information please visit www.easyfundraising.org.uk/causes/kennelclub and simply click 'support us now' to sign up.

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INTRODUCTION FROM KENNEL CLUB CHAIRMAN

As a nation of dog lovers, approximately a quarter of households¹ include a dog – and issues surrounding dog welfare capture their attention as a great many consider their dogs a part of their family.

The results of a recent YouGov poll² on the importance of animal welfare to the electorate showed that when voters were asked to name issues determining how they will cast their vote, 14 percent named animal welfare – more than HS2 or equal marriage. However the mass of voters are in the 29 percent who said none of the parties are committed to animal welfare or the 42 percent who said they didn't know.³

It was for this reason that prior to the 2015 General Election we published 'A Dog's Life' manifesto, to guide the government on issues pertinent to those passionate about dogs and what more should be done to improve the lot of the UK's approximately 9 million⁴ dogs.

In light of the snap election and post-Brexit politics, we have updated our manifesto as the issues that are vital to improving dog's lives are yet to be truly tackled. Certainly, the impact of Brexit has meant we have strengthened our calls in some areas where EU regulations were relied on – even though in themselves they did not solve some of the problems they sought to.

As the UK's largest organisation dedicated to improving the welfare, health and general wellbeing of all dogs throughout every stage of their lives, we offer all dog owners and those working with dogs an unparalleled source of education, experience and advice on dog breeding, dog health, dog acquisition, dog training and responsible dog ownership.

We register around a quarter of a million purebred dogs each year as well as approximately 3,500 crossbreed dogs on our companion and activity registers, and hold the details of over 5 million dogs on Petlog, our microchipped pets database. Around 2,000 dog trainers and behaviourists work under the Kennel Club Accredited Instructor scheme, and with accreditation by the United Kingdom Accreditation Service (UKAS) we also effectively self-regulate almost 6,000 Kennel Club Assured Breeders.

However, a great many dog breeders, dog owners and prospective dog owners are outside of the reach of the immediate influence of the Kennel Club, and without powers of enforcement, we believe that in some instances government intervention is necessary in order to ensure that healthy dogs are bred, and that dogs are treated properly throughout every stage of their lives.

A DOG'S LIFE **BREEDING**



How a dog is bred and reared (particularly in its early weeks), influences its health, welfare and socialisation throughout its life, which is why raising the standard and quality of breeding practices is a priority for the Kennel Club. We introduced our Assured Breeder Scheme (ABS) to help achieve this. However, the requirements of the ABS are not mandatory for those who are not scheme members, and nor can the Kennel Club directly influence those who do not register with us, so it remains the case that puppy farming continues, and in some instances is even licensed by local authorities.

We were pleased with the commitment of the former Government to update regulations on dog breeding though the detail regarding how this would work was not determined prior to the election being called. It is our view that in order for dog breeding regulations to be effective in the future it must be possible for them to be properly enforced – which in our opinion (supported by extensive Freedom of Information based data), is not the case currently.

BREEDING STANDARDS FOR HEALTH AND WELFARE – THE ASSURED BREEDER SCHEME

The Kennel Club established its Assured Breeder Scheme in 2004, which sets standards to ensure that breeders improve the health and welfare of puppies. The scheme effectively self-regulates almost 6,000 members and has achieved UKAS accreditation. The standards of the Assured Breeder Scheme include making use of health screening schemes relevant to all breeding stock. These schemes include DNA testing for a range of inherited conditions and screening for hip dysplasia, elbow dysplasia and inherited eye conditions and we operate the screening schemes in collaboration with the British Veterinary Association.

DNA tests are developed as a result of research by the Kennel Club Genetics Centre at the Animal Health Trust, and other institutions, funded primarily by the Kennel Club Charitable Trust. The test results are available to *all* breeders as part of the Kennel Club Mate Select program, which helps breeders to select suitable mating pairs to avoid breeding puppies with inherited conditions. The hip and elbow schemes include an online resource using ‘estimated breeding values’ (based on

extensive pedigree histories) to help breeders to calculate the genetic risk of either condition causing clinical lameness in dogs.

As well as carrying out relevant health screening, other requirements of the Assured Breeder Scheme include providing post sales advice along with a contract of sale, keeping animals in good conditions, making use of preventative health measures such as worming and immunisation, and effective socialisation of puppies.

The standards for Assured Breeders therefore go beyond the requirements of current (and formerly proposed updated) breeding legislation as well as Model Licence Conditions and make use of modern advances in veterinary science.

The breed specific health tests which we consider to be fundamental in reassuring puppy buyers that the breeder has done all they can to ensure their puppy is healthy, are not possible to incorporate into licence conditions as they are breed specific (meaning there are a great many of them) and apply to pure bred and cross bred dogs.

Regrettably the current number of Assured Breeders cannot fulfil the demand for puppies in the UK, meaning there is still a significant market demand for puppies, which is often met by puppy farmers and puppy dealers operating within the UK and illegally importing puppies.

HIGH VOLUME COMMERCIAL BREEDING - PUPPY FARMING

Puppy farmers are defined as high volume breeders who breed puppies with little or no regard for the health and welfare of the puppies or their parents. A puppy farmer's main objective is profit. To maximise their profit, puppy farmers typically separate puppies from their mothers too early, keep their dogs and the puppies they breed in insanitary conditions, and fail to follow breed specific health schemes or to apply basic, routine health measures such as immunisation and worming.

As a result, puppies bred by puppy farmers are more likely to suffer from common, preventable, infectious diseases, painful or chronic inherited conditions, behavioural issues (because of poor early socialisation) and shorter life spans. Puppy farmed puppies are sold through third parties, typically in pet shops or advertised

by puppy dealers via the internet. Our most recent survey data shows that 20 percent of puppies bought from pet shops or directly via internet websites will suffer from parvovirus (four times more than those from other breeders) and other potentially fatal diseases, which can cost up to £4,000 to treat.⁵

CURRENT BREEDING LEGISLATION

Existing breeding legislation (the Breeding of Dogs Act 1973 and the Breeding and Sale of Dogs (Welfare) Act 1999), setting out the licensing regime for local authorities to enforce, does not contain all of the provisions necessary to meet the welfare needs of dogs in accordance with the Animal Welfare Act. As a result, some puppy farmers are able to operate with a local authority breeding licence giving a false impression that they are meeting the required welfare standards.

Guidance on licensing thresholds is often misunderstood – and a direct result of this is that there is a widely held belief by local authorities that breeders do not require a licence if they breed fewer than five litters per year. However, the legislation requires *all* commercial breeders to operate with a licence regardless of how many litters they breed annually. In addition, many puppy farmers continue to breed puppies illegally by simply covering up the number of litters they produce by failing to declare the correct breeder of the puppies.

RECOMMENDATIONS TO RAISE BREEDING STANDARDS AND CURB PUPPY FARMING

Although regulations for breeding will, we hope, be updated following the election, the detail of the proposed new regulations is yet to be determined and is fundamental to how successful a new system will be in tackling the growing problem of puppy farming. Unfortunately we do not believe that local authorities alone are equipped to deal with the large number of poor breeders currently in business – particularly if the litter licensing threshold reduces to three from five litters per annum (as planned). According to statistics from local authorities in response to freedom of information requests:

- There are fewer than 1000 licensed dog breeders in the UK
- 5 percent of local authorities license 10 or more breeders in their area and 90 percent license 5 or fewer breeders. This suggests many high volume breeders will be operating without a licence
- Over one third of local authorities did not carry out any inspections on dog breeding premises in 2015 and 68 percent carried out 2 or fewer inspections
- 1 dog breeding licence was revoked throughout 2014 and 2015 and over a 5 year period only 20 licences were refused, equating to less than half a percent per year
- 58 percent of local authorities have between 0-2 members of staff who carry out inspections on dog breeding premises
- Local authority staff carrying out inspections on dog breeding premises have over 150 varying job titles, just 28 percent of which include reference to 'animal', 'dog' or 'vet' and job titles of those carrying out inspections include: Business Compliance Officers; Consumer Protection Officers; Gypsy Liaison Officers; Horse Wardens; Public Health and Protection Officers and Pest Control Officers – many of whom it would seem have varying responsibilities of which licensing dog breeders specifically is just one. This suggests that in some local authorities inspectors may be more qualified than others.⁶

The Kennel Club therefore proposes that the Assured Breeder Scheme (ABS) is formally integrated into the licensing regime. This would mean that Assured Breeders (AB's) would continue to be inspected by a Kennel Club assessor. If an AB was breeding 3 litters a year or more however, they would pay an additional (small) administrative fee which the Kennel Club would pass onto the AB's local authority in order that they would receive a licence and inspection report. The Kennel Club would also pass on their details to the local authority. This would save the AB being inspected by the local authority and paying the full licence fee. It would also save the local authority resource in order that they can target high risk breeders.

It is envisaged that our proposed system would assist local authorities who we believe are currently under resourced in licensing breeders who breed either as a business or breed 5 or more litters per year, particularly if that threshold is reduced to 3 litters, thereby covering more breeders. According to Kennel Club registration statistics from 2014 and 2015, this reduction would see a threefold increase in the number of breeders requiring a licence.⁷

The Kennel Club runs the Assured Breeder Scheme solely to improve the health and welfare of puppies being bred. Previously the scheme ran at a cost to the Kennel Club of £120 per breeder over a three year period. Since we have increased the membership fee the ABS still operates at a cost to us. If ever the scheme did generate an income, then the Kennel Club, as a not-for-profit organisation, would invest any surplus back into its Charitable Trust to further the welfare of dogs. It is important for the integrity of the scheme that it is not operated as a business.

This allows for members to be disqualified from the scheme at no cost to the Kennel Club and for inspectors to refuse an accreditation fee from breeders who do not meet our criteria as there are no 'financial targets' to meet. This also allows the Kennel Club to review and raise the standards of the ABS, as is done frequently. Within the past 6 months alone, 13 new DNA testing and reporting schemes were incorporated into the scheme, bringing the total to 67 recorded diseases across 72 breeds.

Working with Agria, the organisation that administers and underwrites Kennel Club pet insurance, the Kennel Club is able to monitor the progress of the ABS with empirical verification that the scheme is achieving its core aims. So far the trends between dogs bred by Assured Breeders and those bred outside the scheme are extremely positive. Agria's analysis highlights that dogs bred by Assured Breeders are costing owners on average 18% less in unplanned veterinary fees and are 23% less likely to need to visit the vet. For older dogs, who experience many of the health issues the scheme is specifically endeavouring to target, the differences are even more acute with dogs bred by Assured Breeders 34% less likely see a vet resulting in veterinary bills that are 27% less for their owners.

Although Assured Breeders cannot currently meet the demands of the puppy buying public as the scheme has only approximately 6,000 members, growing the scheme would lead to real improvements in terms of dog health and welfare. Firstly, if Assured Breeders were more commonplace, it would help the puppy buying public know where to go to get a well-bred dog (pedigree and crossbred), in order that, over time, the current high demand for puppies from puppy farmers would reduce and the demand for puppies from good breeders would increase.

This problem cannot be underestimated as it is clear the puppy buying public cannot recognise a puppy bred by a commercially driven breeder with low welfare standards (often referred to as a 'puppy farmer'). At the moment, the vast majority claim that they would never buy a puppy from a puppy farmer; however recent survey statistics indicate that many may unwittingly do so. In total, 31% of people who bought a puppy in 2014 did not see the puppy with its mother and 53% did not see its breeding environment, meaning those puppies are highly likely to have been sold by puppy dealers, and bred by puppy farmers. In addition, between 2011 and 2013 the number of dogs entering the UK from Lithuania increased by almost eight-fold; and from Hungary over a six-fold increase in dogs travelling under the Pet Travel Scheme (PETS) into the UK was recorded.

IN SUMMARY, TO IMPROVE THE HEALTH AND WELFARE OF PUPPIES BEING BRED THE KENNEL CLUB CALLS ON AN INCOMING GOVERNMENT TO:

- Continue with plans to update regulations on dog breeding
- Formally recognise the Assured Breeder Scheme within the new licensing regime
- Incentivise more breeders to become Assured by introducing an element of self-regulation into the system, allowing for scheme members to receive a licence following their local authority receiving a Kennel Club inspection report
- Note that the Kennel Club would commit to sharing information with local authorities regarding inspections; suspensions; disqualifications; and resignations in order that the local authority would be aware of when they would need to inspect the premises of former scheme members.

A DOG'S LIFE ACQUISITION



How a dog is acquired marks an important stage in a dog's life as the decision to take responsibility for a dog is one that is often taken without sufficient thought, which is a major source of the burden dealt with by dog rescue organisations. It is important that people acquire dogs sensibly, and with sufficient knowledge and forethought. Educating the puppy buying public is key to not only improving the welfare of pet dogs and the standards in breeding, but also in lessening the demand for poorly bred puppies. The Kennel Club supports rescue centres and subsidises its own Assured Breeder Scheme to try and ensure that those who wish to buy puppies do so from reputable breeders.

However, many remain outside the reach of the Kennel Club, which is why we would recommend some intervention from an incoming government to encourage the purchase of healthy, well-socialised dogs from responsible breeders, and thereby assist in dramatically reducing the demand for poorly bred puppy farmed dogs.

PET SHOPS, OVERSEAS PUPPY TRADERS AND ONLINE PUPPY DEALERS

Puppy farmers will most likely sell puppies away from their home environment via a puppy dealer or pet shop. Although the vast majority of people claim that they would not buy a puppy from a puppy farmer, recent survey statistics indicate that many unwittingly do so. Although only two percent of pet shops sell puppies (around 70 UK outlets), of the current dog population of around 9 million, 16 percent are sold via pet shops equating to approximately 1.5 million (approximately 150,000 puppies per annum).⁸ According to our most recent survey data 31 percent of people who have bought a puppy did not see the puppy with its mother and 53 percent did not see its breeding environment, meaning those puppies were highly likely to have been sold by puppy dealers, and bred by puppy farmers.⁹

The unintended consequence of the relaxation of the Pet Travel Scheme was that there was a 400 percent increase in illegal entries of puppies into the UK between 2011 and 2012. Since 2012, there has also been a 25 percent decrease in the number of dogs being recorded as imported for commercial purposes, which suggests that puppy traffickers are exploiting the loopholes in pet travel rules by

disguising imported puppies to be sold, as pet dogs in order to avoid port of entry controls. Even when new regulations to strengthen enforcement regimes came into effect on 29 December 2014, concerns remained that changes would not have the desired impact as commercial traders could still evade border controls by simply declaring puppies to be sold as 'non-commercial'.

Often the puppies being imported are kept and transported in poor conditions and are sold by puppy dealers via the internet, meeting the demand for popular breeds and designer crossbreeds. Legislation on the sale of animals has not kept up with the advent of online selling, a major medium through which puppy dealers advertise and sell puppies.

It is for this reason that the Kennel Club is a leading member of the Pet Advertising Advisory Group (PAAG). PAAG has developed standards for online advertisers to utilise to help ensure that reliable and detailed information exists about puppies for sale, in order that potential puppy buyers can determine whether the puppies have been bred responsibly. The standards also empower the advertisers to exclude adverts where there is a reasonable concern for the health and welfare of an animal involved or where commercial vendors cannot provide a suitable licence.

SOURCING A DOG RESPONSIBLY

Kennel Club breed rescue organisations re-home approximately 24,000 dogs each year throughout the UK and our commitment to rescue continues to grow as we work ever more closely with breed rescue organisations to support their charitable work aimed at finding the right homes for purebred dogs in the UK.

We do however have concerns at unconfirmed plans from leading rescue centres to start their own breeding programmes and believe that those who want to buy a young dog, should buy healthy and well-socialised puppies from responsible breeders (i.e. normally not volume breeders outside of a home environment). There are almost 6,000 Kennel Club Assured Breeders, and in 2016 Assured Breeders bred nearly 18,000 puppies.

However, Assured Breeders currently cannot meet the annual demand for puppies. Many will have waiting lists (as they do not breed frequently) and will be selective as to where their puppies go. Our advice is that this is the right approach to dog breeding and rehoming but messages about how to responsibly source a healthy dog require further support in order to have the desired impact on public behaviour and to support the development of the assured breeder concept.

RECOMMENDATIONS TO PROMOTE THE RESPONSIBLE SALE OF DOGS AND CURB PUPPY FARMING AND POOR BREEDING PRACTICES

As raised in the previous section, we ultimately believe good breeders should be encouraged to breed in order to attempt to better meet demand and that they should be incentivised to become Assured Breeders in order that they can be identified more easily by the public. At the moment there is no incentive for good breeders to become assured, as they are able to sell their puppies outside of the scheme while membership imposes a cost on them and an additional inspection burden. However if they were able to save money through avoiding duplicated inspections, resulting in a low cost licence this may help drive the best breeders towards the scheme.

We also believe that good breeders would not sell their puppies to a third party for re-sale. Although third party sales have always been prohibited under the Assured Breeder Scheme, Kennel Club rules of registration now state 'a breeder must not sell Kennel Club registered dog/s to or via a commercial dog wholesaler or retail pet dealer or shop. Neither may a breeder indirectly allow dogs to be given as a prize or donation in a competition of any kind' meaning that we would refuse to register the puppy of any breeder known to be selling to third parties (not just Assured Breeders).

Given this we believe that an incoming government should ban the sale of puppies through third parties such as pet shops. More also needs to be done to clamp down on those illegally importing puppies for commercial purposes by transferring responsibility to conduct checks on passengers from ferry companies to border control agencies,

increasing spot checks at ports and targeting enforcement regimes based on data showing where the illegal trade of puppies comes from (i.e. Holyhead, Dover and the Eurotunnel).

IN SUMMARY, TO IMPROVE THE WAY DOGS ARE ACQUIRED THE KENNEL CLUB CALLS ON AN INCOMING GOVERNMENT TO:

- Prohibit the sale of puppies in pet shops
- Incentivise good breeders to join the Assured Breeder Scheme in order to be recognised by puppy buyers
- Clamp down on those illegally importing puppies for commercial sale and target enforcement to the 95 percent of trade that comes through Holyhead, Dover and the Eurotunnel.

A DOG'S LIFE TRAINING



Training should be an important part of every dog's life as it provides the vital physical and mental stimulation needed to ensure a dog's wellbeing and welfare – poor training or a lack of training has implications for both animal welfare and human safety. The Kennel Club encourages and promotes positive, reward-based training to strengthen the bond between a dog and its owner.

However, there are many 'mixed messages' with regards to dog training with some 'professional' dog trainers and behaviourists using outdated practices and techniques, and a range of extreme negative dog training devices on the market for use by the general dog owning public.

This lack of consistent messaging on the correct way to train a dog, to ensure dog welfare and human safety, needs to be addressed by a future government.

IMPLICATIONS OF POOR TRAINING

Human understanding of dog welfare and behaviour has advanced significantly in the past ten to fifteen years and is now a well-established science and discipline. Some previously accepted aversive theories and techniques, based on the principle of applying something painful or frightening to reduce the likelihood of an unwanted behaviour occurring, are no longer considered necessary or acceptable to train dogs.

In particular, the Kennel Club opposes the use of electronic shock training devices (ESTDs) which have a proven negative impact on animal welfare, and in some cases make problems worse. A ban on the sale and use of ESTDs is widely supported by nearly three quarters of the public according to a recent Kennel Club survey¹⁰ and the sale and use of ESTDs has already been outlawed in Wales by regulations introduced under the Animal Welfare Act. Regulations are currently being developed in Scotland to effectively ban the use of such devices other than under veterinary supervision (though it is worth noting the position of the British Veterinary Association which is opposed to their use in all circumstances).

In Wales, even when these regulations were challenged under Judicial Review instigated by the Electronic Collar Manufacturers Association (ECMA), the Royal Courts of Justice found in favour

of the Welsh Assembly. We believe that England should follow suit and ban the sale and use of electronic shock training devices based on extensive evidence based research which concludes they are unnecessary and have a long term negative welfare impact.

Recent research commissioned by the Department of Environment, Food and Rural Affairs (Defra) showed that there were significant long term negative welfare consequences for a proportion of the dogs that were trained with ESTDs – namely electronic shock collars. 1 in 4 dogs showed signs of stress compared to less than 5 percent of dogs reacting to positive training methods. Furthermore, 1 in 3 dogs yelped at the first use of an electric shock collar and 1 in 4 yelped at subsequent uses.

The studies concluded that even when electronic shock collars were used by professionals following an industry set standard of training approved by the ECMA, there were still long term negative impacts on dog welfare. Lastly, the studies also demonstrated that positive reinforcement methods were effective in treating livestock chasing, which is the most commonly cited justification of their use, and where they are unnecessary given farmers' advice to keep dogs on leads around sheep.

PROPOSED STANDARDS FOR DOG TRAINING – THE KENNEL CLUB ACCREDITED INSTRUCTOR SCHEME

The problem of the availability of extreme negative training devices is compounded by the fact that there are still practitioners that use aversive theories and techniques. The dog training industry is unregulated and anyone can set up a business training dogs without appropriate qualifications, knowledge and skills.

However, standards for those in the behaviour and training industry do exist and are embodied in the Kennel Club Accredited Instructor scheme (KCAI) which we believe delivers a high standard of education, guidance and support for all those who work with dogs. The scheme assesses and accredits trainers who comply with appropriate standards which we believe all dog trainers and behaviourists should be required to adhere to across the globe, and we have worked with LANTRA to develop National Occupational Standards.

The KCAI scheme is now the only scheme in the UK which is approved by City & Guilds NPTC which ensures its members have a nationally recognised, credible and externally verified qualification. With a growing membership of 2,000 trainers and behaviourists working under the Kennel Club code of practice for Accredited Instructors, the Kennel Club is well positioned to be the leading canine organisation for dog training and behaviour. To demonstrate this, we already have a partnership in place with Battersea Cats and Dogs Home in order that they offer KCAI as a training programme to a selection of their staff.

RECOMMENDATIONS FOR IMPROVING DOG TRAINING

Given the mounting evidence that exists on the welfare implications of ESTDs, we believe an incoming government should review the Codes of Practice under the Animal Welfare Act at the earliest opportunity to include a prohibition on the use and sale of ESTDs.

With a wide range of positive training tools and methods available, as well as extensive research on the welfare implications of ESTDs, we do not believe it is necessary to train dogs using fear or pain as inducement. Neither is it worth potentially damaging the relationship between dog and handler.

In order to ensure that dog trainers and behaviourists are qualified to provide the most reliable, up-to-date training techniques, we believe that government should develop an industry standard based on the Kennel Club Accredited Instructor programme.

IN SUMMARY, TO IMPROVE HOW DOGS ARE TRAINED THE KENNEL CLUB CALLS ON AN INCOMING GOVERNMENT TO:

- Prohibit the sale and use of electronic shock training devices
- Adopt the KCAI requirements as an industry based standard that all dog trainers and behaviourists must comply with.

A DOG'S LIFE
**RESPONSIBLE
OWNERSHIP**



Although responsible ownership should be a permanent feature in every dog's life, some will have irresponsible owners, or owners that train their dogs to behave aggressively. The Kennel Club runs the Good Citizen Dog Training Scheme which provides training from a basic to an advanced level and works to strengthen the bond between people and dogs. However, the influence of human behaviour on dogs is largely ignored by current legislation which instead defines certain types of dogs as inherently dangerous.

We believe that to better address the issue of dangerous dogs, an incoming government should focus on the 'deed not breed' of the dog, and target those persons responsible for of any type of dog that behaves aggressively.

Further, we believe those who are cruel to dogs and who train dogs to be aggressive by using them to fight, should feel the full force of the law with regards to sentencing. At the moment, we believe sentencing is far too lenient and does not act as a sufficient deterrent to those using cruel practices to train their dogs to be aggressive or who may be cruel to dogs purely for their 'entertainment'.

'DANGEROUS' DOGS

There is currently a plethora of legislation addressing 'dangerous' dogs, with at least nine pieces of legislation dating back to 1871. This causes confusion amongst enforcers and courts about which legislation to use and when.

Currently the law on dangerous dogs refers to specific breeds of dogs as 'dangerous'. The Kennel Club believes breed specific legislation ignores the most important factors that contribute to biting incidents – primarily anti-social behaviour by irresponsible dog owners who train their dogs to be aggressive or do not train their dogs adequately. All dog owners must take responsibility for their dogs as any dog in the wrong hands has the potential to be dangerous – as is demonstrated by the number of biting incidents involving types of dogs that are not classified as dangerous under current legislation.

Consequently, current legislation based on assumed breed traits that ignores the influence of the dog's keeper in training and socialising their

dog has failed to prevent a significant number of dog attacks or dog related incidents (there were 6,740 admissions for dog bites and strikes in 2013)¹¹ and kenneling costs associated with breed specific legislation have been described as 'considerable'.¹² Furthermore, it has made banned breeds fashionable and attractive to people who want to flout the law and use dogs to be aggressive and intimidating. This contributes to the problem of creating so called 'status dogs'. The Kennel Club firmly believes that repealing breed specific legislation would lessen the appeal of these dogs and also reduce cases of animal cruelty.

RECOMMENDATIONS

At present there is a lack of detailed data in to explain why dog bite related incidents may occur in order that prevention measures can be put in place. In order to aid this understanding, more data would need to exist – for example, on the medical and behavioural history of the individual dog involved, what those involved did at the time of the incident, and the connection between dog behaviour and the severity of bite inflicted. Research suggests there are a range of factors that may contribute to dog biting incidents and dog-related fatalities, though each incident is specific to the circumstances. Better investigation of dog bite incidents would result in greater understanding of the potential triggers which could assist in preventing such incidents occurring. At present there is little incentive to gather data relating to dog biting incidents.

With 71 percent of respondents to a Defra consultation agreeing that breed specific legislation should be repealed,¹³ we believe that all relevant dog control legislation should be updated and consolidated and replaced with preventative legislation based on current scientific understanding of dog behaviour, instead of stereotypes regarding specific breeds.

In the meantime, we believe that the conditions in which seized dogs in kennels are kept need to be improved for the sake of their welfare and in order that if those dogs are returned to their owners they are well-adjusted.

There are many cases in which dogs of a particular type are seized by the police but then returned to their owners and placed on a register

of exempted breeds. Sadly however many are so traumatized from their experience in kennels that they are then put to sleep.

Lastly, we believe sentencing guidelines relating to cruel owners, owners who train their dogs to fight and to be aggressive, and other individuals who are cruel to dogs need to be reviewed.

This type of deliberate cruelty toward dogs is unacceptable, not only for the animals involved, but also those who may come into contact with them. Some recent high profile cruelty cases have led to public concern about the prison sentences given to those found guilty of cruelty and animal fighting. At present the penalty is a maximum of six months which in comparison with other countries is relatively low. Northern Ireland has recently implemented a five-year maximum sentence, Scotland at one year, Germany sets a maximum of three years for animal cruelty as does the Czech Republic and Romania, whilst France sets two years. By comparison England has one of the shortest custodial sentences for cruelty in Europe.

IN SUMMARY, TO IMPROVE DOG CONTROL THE KENNEL CLUB CALLS ON AN INCOMING GOVERNMENT TO:

- Update, consolidate and, where necessary, replace existing legislation on dog control with preventative legislation and measures based on the principle of 'deed not breed'
- Investigate all serious and fatal dog bite incidents using the services of a suitable behaviourist to understand the causes, and aid effective preventative measures
- Issue updated guidance to police forces about the importance of looking after dogs of a certain type whilst in custody in order that they may adjust well to their return as a family pet
- Increase the maximum sentences for animal cruelty to two years.

A DOG'S LIFE
**ROUTINES
IN EVERYDAY
LIVING**



For the majority of dogs kept as companions, exercise will be an important part of their life. Others may also bond with their owners through work, and through activities such as agility, heelwork to music and dog showing.

Providing a dog with physical exercise is important for a dog's health and wellbeing, with some evidence suggesting that dog walking is associated with reducing dog behaviour-related problems including destructiveness and barking.¹⁴ In addition to this in the UK, only 39 percent of men and 29 percent of women meet the government's recommended amount of physical daily activity, but evidence suggests that if all dog owners briskly walked their dogs for at least 30 minutes each day they would easily reach the target.¹⁵ In order to achieve this goal, studies show that people are more likely to walk their dogs if they are able to do so off-lead and access public open space.¹⁶

ACCESS TO DOG WALKING AREAS

The Kennel Club believes that all dogs should be able to enjoy the UK's open spaces with responsible owners. However, we do not oppose restrictions on access that are evidence-based and proportionate, provided that in such cases, where access is restricted, suitable alternative space is provided for dog walkers.

In recent years, local authorities have had the power to introduce measures to prevent dogs accessing areas that were commonly used for dog walking. In response to this, the Kennel Club established a dog owners' group, KC Dog, to keep dog owners up to date about restrictions being consulted on in their local areas. Currently restrictions can be in the form of Dog Control Orders (DCOs) or Public Spaces Protection Orders (PSPOs).

The number of implemented Dog Control Orders is not recorded, but anecdotal evidence suggests that access officers in different local authorities have noted an increase in the amount of restrictions placed on dog owners. This trend has a negative impact upon dog walkers, some of whom have been dispersed onto sensitive land which has caused wider negative effects to both plant and animal life, thereby causing further restrictions being placed on dogs and their owners.

Since October 2014, Public Spaces Protection Orders (PSPOs) replaced Dog Control Orders and DCOs must convert into PSPOs by October 2017.

The key differences between DCOs and PSPOs are that DCOs were limited to a set of prescribed offences – local authorities could implement all or some of the following measures: require dog waste to be binned (a measure which is never opposed by the Kennel Club providing exemptions are in place for anyone physically impaired from doing this); require a dog be kept on a lead; require a dog be kept on a lead when directed by an authorised officer; require dogs be banned from certain areas; and set a limit on the number of dogs a person could walk.

PSPOs however provide almost unfettered flexibility in the creation of offences. Strictly speaking local authorities do not have to consult the public on PSPOs (as they did for DCOs). While the majority of local authorities are consulting, the increasing popularity of online surveys means that consultations are often carried out poorly and sometimes the results are skewed – for example if respondents are forced to answer a question, or if there is no space for additional comments other than a ‘yes/no’ answer which could be open to interpretation. There are also no automatic exemptions in place from PSPOs for those with disabilities as there were with DCOs.

The reason the Kennel Club welcomes PSPOs however is because government guidance does advise for the Kennel Club, via KC Dog to be consulted and also, the legislation which PSPOs derive from (the Anti-social Behaviour, Crime and Policing Act) introduced tools for local authorities to target just the perpetrators of irresponsible dog related behaviour, as an alternative to blanket PSPOs. However, over the period since PSPOs were enacted we have responded to over 130 consultations and have seen very few targeted measures introduced. What is more is that in some cases dog restrictions have been introduced without a satisfactory evidence base and have been more restrictive than they have needed to be (for example year round bans of dogs from beaches rather than a summer ban only).

Although much of this goes against current guidance, the guidance document is currently quite complex and lengthy and in some cases is not explicit enough in its intentions. Given this, prior to the election being called the Kennel Club worked closely with the Home Office on updated guidance which we would call on the incoming Government to pass, in order that it can be circulated to local authorities.

Given requirements under the Animal Welfare Act for dogs to be regularly exercised, the increasing prevalence of restrictions on where dogs can be walked is an important issue for dog owners. In order to keep abreast of restrictions on where dog walkers can go with their dogs, we believe central government should monitor and record information relating to the Public Spaces Protection Orders from local authorities, including what Orders are consulted on, what level of response was achieved and what Orders were introduced as a result.

DOG SHOWING

As the governing body of dog showing in the UK, the Kennel Club encourages dog showing as a rewarding, healthy hobby, which helps keep dog owners fit and active, and ensures good dog behaviour and training.

More importantly dog showing plays a fundamental role in improving the health and welfare of dogs – in particular of ‘Category Three’ breeds – defined as those who have had a history of being bred for exaggerated features that are detrimental to their health and welfare. With very few health tests and no legislation to prevent the breeding of dogs for physical exaggerations, which are very subjectively defined and difficult to quantify, dog shows are the only way of visibly monitoring dogs’ conformation.

Kennel Club licensed dog shows reward dogs for meeting the Breed Standards – all of which explicitly state that exaggerations that are in any way detrimental to health are not acceptable – and dog show judges are trained to only reward healthy dogs, which is backed up by veterinary checks at Kennel Club licensed shows.

The Kennel Club agrees with the conclusion of Professor Sir Patrick Bateson's 'Independent Inquiry into Dog Breeding' in January 2010, which highlighted dog shows as being 'a powerful lever for change'. This is because they educate those participating, and the public watching them, about what a healthy example of the breed should look like. In the case of Crufts this is particularly powerful as viewing figures are 4.6 million.

WORKING DOGS

Many people who work their dogs will choose to have them docked as puppies in order to prevent injury whilst working. With recent research from the University of Glasgow showing that undocked working dogs are more likely to suffer tail injury and amputation (with more than half of undocked spaniels experiencing a tail injury in a set year),¹⁷ we believe that prevention of injury is a sensible course of action for breeders of working dogs. We also welcome the recent decision by the Scottish Government to introduce an exemption to the docking ban for working dogs, as is the case in the rest of the UK. However, under the Animal Welfare Act, the decision to dock a puppy's tail if it is likely to be used for working purposes (or have it amputated for medical reasons) does mean that their owners are unable to show them at any dog show where the general public are required to pay an entrance fee.

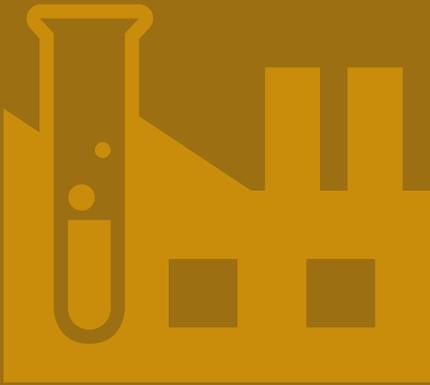
This restriction impacts dog owners who have docked or amputated their dog's tail legally and to safeguard their health and welfare.

Despite the past controversies surrounding tail docking, the Kennel Club is of the opinion that this restriction has achieved no benefit for the health and welfare of dogs generally and, in order to increase the visibility of healthy working dogs at dog shows (as dog shows are a positive influence for change), and to educate potential dog owners about the conformation of healthy examples of those breeds, such dogs should be allowed to be shown at all dog shows. We will therefore look to an incoming government to amend the Animal Welfare Act which bans legally docked working dogs and dogs with amputated tails from being shown at shows with a paying gate.

IN SUMMARY, TO IMPROVE HOW DOGS LIVE THEIR DAY TO DAY LIVES THE KENNEL CLUB CALLS ON AN INCOMING GOVERNMENT TO:

- Record information relating to Public Spaces Protection Orders from local authorities
- Require local authorities to positively engage with local dog owners when introducing Public Spaces Protection Orders
- Amend the Animal Welfare Act to allow legally docked working dogs and dogs with surgically amputated tails (for medical reasons) to be shown at all dog shows
- Continue to work with the Kennel Club on updating guidance on PSPOs for local authorities in order that the least restrictive approach is taken and that all PSPOs are evidence based
- Conduct a formal post-legislative scrutiny review of the anti-social behaviour measures contained within the Anti-Social Behaviour, Crime and Policing Act 2014.

A DOG'S LIFE
**FREE FROM
ANIMAL
TESTING**



For the thousands of dogs who spend their everyday lives in laboratories, the Kennel Club strongly supports the principles of the three Rs (Refinement, Reduction and Replacement), as the guiding principles which underpin the humane use of animals in scientific research.

The Kennel Club is opposed to the use of dogs in animal experiments which are conducted for the primary benefit of humans, and has significant concerns over the use of dogs in regulatory toxicity testing. According to Home Office statistics 3,405 dogs were used in animal experiments in the UK in 2015. Some dogs were used in multiple scientific procedures, with a total of 4,643 procedures conducted on dogs in 2015.¹⁸

Just over 70% of the 4,107 scientific procedures involving dogs were carried out for regulatory tests in the development of medicinal products for human use, with less than 0.05% of all procedures identified as being required for the development of veterinary medicines. The remaining 30% of procedures can be attributed to other forms of regulatory testing (13%), incorporating testing of pesticides etc, and fundamental research aimed at improving human and/or animal health (16%).¹⁹

LIMITED USE OF TESTING ON DOGS

Most commonly dogs are used as a second species in these regulatory tests, with rodents typically being the first species employed. The use of two species in these types of tests is a worldwide requirement. However, a 2013 study questioned the benefit of using dogs in these second species tests. The study, published in a peer reviewed scientific journal, analysed historical data from 2,366 drugs which had been approved for human use. It concluded: "This analysis of the most comprehensive quantitative database of publicly-available animal toxicity studies yet compiled, suggests that dogs are highly inconsistent predictors of toxic responses in humans, and that the predictions they can provide are little better than those that could be obtained by chance - or tossing a coin - when considering whether or not a compound should proceed to testing in humans."²⁰ In light of this research the Kennel Club would like to see an independent review

of whether the use of dogs in second species testing is still justified or whether more suitable alternatives are available.

PRINCIPLES OF ANIMAL TESTING

Where animals continue to be used in animal experimentation, the Kennel Club strongly supports the principles of the 3Rs (Refinement, Reduction and Replacement), as the guiding principles which underpin the humane use of animals in scientific research:

- Refinement: improving scientific procedures and husbandry to minimise potential pain and suffering and improve animal welfare in situations where the use of animals is unavoidable.
- Reduction: improving test methods to enable researchers to obtain comparable levels of information from fewer animals or more information from the same number of animals.
- Replacement: finding replacements to animal testing e.g. computer modelling.

The Kennel Club funds and supports the work of FRAME (Fund for the Replacement of Animals in Medical Experiments) to carry out research projects on the use of dogs in laboratories, with the aim of developing a scientific strategy to minimise, and eventually eliminate, the use of dogs in biomedical research and testing. In addition the Kennel Club Charitable Trust has provided project funding towards this aim.

RECOMMENDATIONS

In spite of the Animals (Scientific Procedures) Act 1986, which insists that no animal experiments should be conducted if there is a realistic alternative, evidence suggests more needs to be done to ensure animals are not used in testing unnecessarily.²¹ To enable this more resources are required for the advancement of the 3Rs. Additionally improved standards in reporting of animal experiments are required, along with greater transparency of the use of animals in experiments to avoid unnecessary duplication of experiments.²² While dogs continue to be used in animal experiments, it's essential that appropriately high standards of animal welfare are adhered to in all animal testing establishments and associated breeding facilities.²³

**IN SUMMARY, TO HELP REDUCE THE USE OF DOGS
IN ANIMAL TESTS THE KENNEL CLUB CALLS ON AN
INCOMING GOVERNMENT TO:**

- Commission an independent review of whether the benefits derived from using dogs in second species toxicity tests justifies their use, and whether more suitable alternatives are available
- Increase transparency of animal testing and remove the so called privacy clause (section 24) from animal testing legislation, as supported by both the scientific industry and animal welfare campaigners
- Require establishments, including breeding facilities, to have a policy to re-home dogs whenever possible and for accurate statistics on re-homing of laboratory animals to be published annually
- Work with the scientific sector and funding bodies to improve reporting of animal testing. Require the publication of all results from animal experiments (both positive and negative) to avoid unnecessary duplication, with allowances for the protection of genuinely commercially sensitive information
- Review the welfare of dogs in laboratories including breeding, transportation, housing, nutrition, health, handling and euthanasia, to ensure that all efforts to reduce suffering are being implemented
- Increase funding to develop alternatives to animal testing.

BREXIT CONSIDERATIONS

The Kennel Club is a leading member of the Canine and Feline Sector Group and we wish to highlight the sector view on the legislative implications regarding pet travel and disease control for animals entering the UK following the decision to leave the EU.

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. Defra figures showed that the number of dogs entering Great Britain via PETS increased by 61% in the first year of controls being relaxed. The number of dogs entering Great Britain under PETS in 2011 was 85,299 compared to 164,836 entering in 2015. There has also been a noticeable increase in imports of puppies and dogs from certain central and eastern European countries such as Hungary, Lithuania, Romania and Poland. The number of Lithuanian dogs travelling into Great Britain under PETS increased by 780% between 2011 and 2013. The number of Hungarian dogs travelling into Great Britain under PETS increased by 663% in the same period. 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 under age puppies and issues with controls at the border. This presents a problem not only for the acquisition of dogs, as highlighted earlier in our manifesto, but also has public health implications. For example; if dogs are not appropriately treated against the tapeworm, there is a risk of this zoonotic parasite being introduced into the UK which can be passed from animal to human. There are also other diseases which are not covered in the current legislation, which have great potential to compromise animal health in the UK. These include leishmaniasis, ehrlichiosis and babesiosis.

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. For many who take part in dog activities such as showing and dog agility, PETS has facilitated this, while also allowing making

it easier for Europeans counterparts to compete in UK events. Any reform of pet travel should balance the pros and cons of the existing system.

Regulation No 576/2013 sets out the requirements for dogs, cats and ferrets which are moved for non-commercial purposes between EU Member States or into the EU and requires all dogs, cats and ferrets which are moved between or into Member States to be microchipped, vaccinated against rabies and to have a valid pet passport. The key improvements recommended by CFSG to the legislation on non-commercial pet travel are:

Rabies antibody titration test – We suggest consideration of the reintroduction of rabies blood testing before entry into the UK. While the need to blood sample 21–30 days after vaccination and wait for results may slightly increase the age at which puppies travel, the primary reason for supporting the re-introduction is to ensure that vaccination has been successfully carried out in accordance with the regulations. We would also recommend a wait period of at least 30 days after the date of vaccination and for there then to be a 3 month wait period before the pet animal is moved between countries. Although there have not been any confirmed cases of rabies in animals travelling under the Pet Travel Scheme, a single dog or cat developing rabies in the UK could have a profoundly damaging impact on the public attitude towards pet ownership. Furthermore, although not the primary reason for adding a wait period, this would also make it easier for authorities to differentiate between adult dogs and those that are too young to legally enter the country.

Tick treatment – We recommend that a requirement is reintroduced for dogs and cats to be treated against ticks before entering the UK, to prevent exotic parasitic infections such as *Babesia canis* and *Ehrlichia canis* being introduced into the UK. This could be based on the previous requirement for tick treatment.

Tapeworm treatment – We support the continued requirement for tapeworm treatment before entry into the UK but recommend shortening the treatment window before entry into the UK from 24–120 hours to 24–48 hours as previously required.

Centrally accessible database – 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.

Carriers – We question whether enforcement of the legislation on pet movement should be left to carriers rather than government agencies.

THE BALAI DIRECTIVE

Directive 92/65/EEC (often referred to as the Balai Directive) sets out the animal health requirements for animals being moved between or into Member States for commercial purposes. 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. In addition, we have serious concerns that there is currently a lack of checks at sea ports and the Eurotunnel for compliance with Directive 92/65/EEC, as checks take place at the arrival destination and currently only up to 10% of consignments are checked. We would recommend this being increased.

The new Animal Health Regulation 2016/429, adopted in March 2016, is an important new piece of EU legislation, and the detailed provisions under this Regulation are still to be established by delegated or implementing acts. It is important that the UK continues to input into EU negotiations on the relevant implementing and delegated acts under the Animal Health Law.

RECOMMENDATIONS TO AN INCOMING GOVERNMENT TO IMPROVE DOGS' LIVES

BREEDING

- Continue with plans to update regulations on dog breeding
- Formally recognise the Assured Breeder Scheme within the new licensing regime
- Incentivise more breeders to become Assured by introducing an element of self-regulation into the system, allowing for scheme members to receive a licence following their local authority receiving a Kennel Club inspection report
- Note that the Kennel Club would commit to sharing information with local authorities regarding inspections; suspensions; disqualifications; and resignations in order that the local authority would be aware of when they would need to inspect the premises of former scheme members.

ACQUISITION

- Prohibit the sale of puppies in pet shops
- Incentivise good breeders to join the Assured Breeder Scheme in order to be recognised by puppy buyers
- Clamp down on those illegally importing puppies for commercial sale and target enforcement to the 95 percent of trade that comes through Holyhead, Dover and the Eurotunnel.

TRAINING

- Prohibit the sale and use of electronic shock training devices
- Adopt the KCAI requirements as an industry based standard that all dog trainers and behaviourists must comply with.

RESPONSIBLE OWNERSHIP

- Update, consolidate and, where necessary, replace existing legislation on dog control with preventative legislation and measures based on the principle of ‘deed not breed’
- Investigate all serious and fatal dog bite incidents using the services of a suitable behaviourist to understand the causes, and aid effective preventative measures
- Issue updated guidance to police forces about the importance of looking after dogs of a certain type whilst in custody in order that they may adjust well to their return as a family pet
- Increase the maximum sentences for animal cruelty to two years.

ROUTINES IN EVERYDAY LIVING

- Record information relating to Public Spaces Protection Orders from local authorities
- Require local authorities to positively engage with local dog owners when introducing Public Spaces Protection Orders
- Amend the Animal Welfare Act to allow legally docked working dogs and dogs with surgically amputated tails (for medical reasons) to be shown at all dog shows
- Continue to work with the Kennel Club on updating guidance on PSPOs for local authorities in order that the least restrictive approach is taken and that all PSPOs are evidence based
- Conduct a formal post-legislative scrutiny review of the anti-social behaviour measures contained within the Anti-Social Behaviour, Crime and Policing Act 2014.

FREE FROM ANIMAL TESTS

- Commission an independent review of whether the benefits derived from using dogs in second species toxicity tests justifies their use, and whether more suitable alternatives are available
- Increase transparency of animal testing and remove the so called privacy clause (section 24) from animal testing legislation, as supported by both the scientific industry and animal welfare campaigners

- Require establishments, including breeding facilities, to have a policy to re-home dogs whenever possible and for accurate statistics on re-homing of laboratory animals to be published annually
- Work with the scientific sector and funding bodies to improve reporting of animal testing. Require the publication of all results from animal experiments (both positive and negative) to avoid unnecessary duplication, with allowances for the protection of genuinely commercially sensitive information
- Review the welfare of dogs in laboratories including breeding, transportation, housing, nutrition, health, handling and euthanasia, to ensure that all efforts to reduce suffering are being implemented
- Increase funding to develop alternatives to animal testing.

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