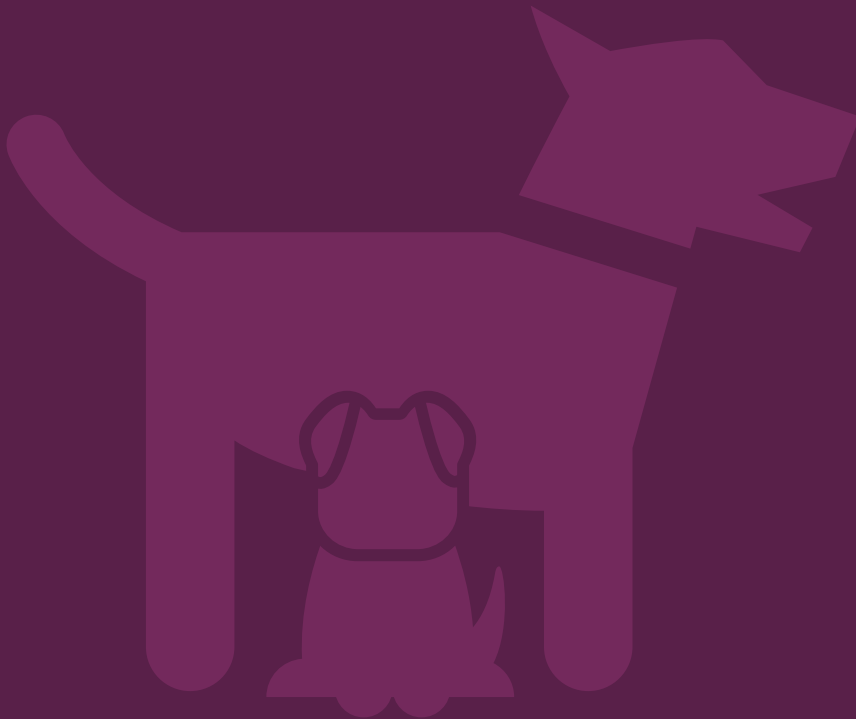


COLLABORATION IS KEY

THE WAY FORWARD
FOR BREEDING
REGULATIONS



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COLLABORATION IS KEY – THE WAY FORWARD FOR BREEDING REGULATIONS


The Kennel Club is the largest organisation in the UK devoted to dog health, welfare and training, whose main objective is to ensure that dogs live healthy, happy lives with responsible owners.

The Kennel Club is the only organisation accredited by the United Kingdom Accreditation Service (UKAS) to certify dog breeders. Its requirements go beyond local authority licensing standards in several key areas including pre-sale vet checking, health testing and screening and lifetime support for puppy buyers.

The government is committed to introducing new regulations on dog breeding which will reduce the litter licensing threshold at which breeders will require a licence, from five litters per year to three. Based on Kennel Club registration data alone, this will result in a threefold increase to the already stretched workloads of local authorities.

We want to ensure that the new system works in practice in order that more breeders are inspected, good breeders are more identifiable to puppy buyers and puppy farmers and bad breeders are driven out of business. One way to achieve this is to take this opportunity to grow the scheme by incentivising the best breeders to join and improving the standards of health and welfare in dog breeding.

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SECTION 1

BACKGROUND TO NEW BREEDING REGULATIONS AND THE KENNEL CLUB VIEW

Defra published a consultation on a review of animal establishments licensing in December 2015. Many welcomed the proposal in the consultation to reduce the litter licensing threshold from five litters per year to three. However despite the additional workload this will create for local authorities carrying out inspections, many respondents had concerns with the proposal to 'exempt' members certified by a UKAS accredited body (such as members of the Assured Breeder Scheme certified by the Kennel Club) from licensing requirements. In hindsight, we believe the word 'exemption' created some confusion and uncertainty for respondents, many of whom had concerns about the creation of a two-tier system that was outside the overall control of local authorities.

In February 2017 Defra published its Next Steps document on the licensing review which clarified that Defra would not pursue the option of a full exemption from licensing for breeders certified by a UKAS accredited body, but would incorporate the concept of earned recognition into the new licensing system. It was explained that this would include consideration of affiliation to a body accredited by UKAS in a risk-based assessment process which would ensure a reduced burden on low risk breeders and on local authorities, whilst maintaining overall local authority control over the licensing system.

The Kennel Club welcomes this approach which has already been adopted by the Assured Breeder Scheme and means that due to a number of additional surveillance mechanisms, we are able to lower the frequency of inspections, whilst still ensuring higher standards and compliance.

We also welcome the introduction of a risk-based system as opposed to a two-tier model and later in the report demonstrate how this could work in practice to the advantage of local authorities and responsible breeders.

SECTION 2

KEY STATISTICS

When the new regulations are introduced, around 5,800 more breeders in England will require a licence. This is based on information from our database which shows that 1,750 more breeders who register with the Kennel Club will require a licence, and the Kennel Club registering around 30 per cent of puppies bred. This equates to nearly a ten-fold increase in some local authority areas.

These statistics are based on Freedom of Information requests from every local authority in England.

Local Authority Statistics	Assured Breeder Scheme Statistics
<ul style="list-style-type: none"> • There are fewer than 1,000 licensed dog breeders in the UK. • 5 per cent of local authorities license 10 or more breeders in their area and 90 per cent license five or fewer breeders. This suggests many high volume breeders will be operating without a licence currently. 	<ul style="list-style-type: none"> • 4,952 breeders are registered on the Assured Breeder Scheme. • On average the ABS receives over 50 new applications per month.
<ul style="list-style-type: none"> • Over one third of local authorities did not carry out any inspections on dog breeding premises in 2015 and 68 per cent carried out two or fewer inspections – equating to under 900 inspections (610 in England). 	<ul style="list-style-type: none"> • The ABS inspected approximately 2,200 breeders in 2014, its first year of full inspection, and currently inspects approximately 1,200 annually. In England the ABS inspects almost double the number of breeders that local authorities do. • The ABS currently has the capacity to carry out 5,000 inspections per annum which grows as the number of scheme members increases.

Local Authority Statistics	Assured Breeder Scheme Statistics
<ul style="list-style-type: none"> One dog breeding licence was revoked throughout 2014 and 2015 and over a five year period only 20 licences were refused, equating to less than half a per cent per year. 	<ul style="list-style-type: none"> 304 dog breeders were suspended from the ABS during 2014 and 2015.
<ul style="list-style-type: none"> 58 per cent of local authorities have two or fewer members of staff who carry out inspections on dog breeding premises. 	<ul style="list-style-type: none"> The ABS aims to have at least one fully trained assessor for every 50 mile radius of the UK. They receive residential training twice a year and are regularly competency assessed at least twice per year.
<ul style="list-style-type: none"> Local authority staff carrying out inspections on dog breeding premises have over 150 varying job titles, just 28 per cent of which include reference to 'animal', 'dog' or 'vet'. This suggests that in some local authorities inspectors may be more qualified than others. 	<ul style="list-style-type: none"> All assessors are selected from an appropriate and relevant industry and have a relevant background in animal welfare.

These figures show that within the local authority licensing regime there is inconsistency in the application of the law and the inspection regime – with virtually no licences revoked and inadequate expertise and resources.

It is worth noting that in Wales, where tighter regulations were introduced to curb puppy farming and the licensing threshold was reduced from five litters per year to three, the number of licensed breeders decreased from 195 in 2014, to 181 in 2015 and stood

at 200 in 2016 (even though at least three times as many breeders would have required a licence). What is more, only three licences were refused and none were revoked from 2015–2016.

This suggests that without collaboration, tighter regulations do not equate to better enforcement. In our view collaboration is key to improving enforcement in the standards of breeding.

SECTION 3

THE ASSURED BREEDER SCHEME - COST AND OBJECTIVES

The ABS is regulated by UKAS and is not subject to any outside influence. UKAS accreditation of the Kennel Club to certify breeders ensures that assessors are trained, and operate in a consistent manner. The Kennel Club is a not-for-profit organisation with a Charitable Trust which works solely to improve the health and welfare of all dogs. The Kennel Club set up the ABS to tackle puppy farming by raising the standards of breeding, thereby improving dog health and welfare, and helping the puppy buying public identify the best breeders i.e. Assured Breeders.

Previously the scheme ran at a cost to the Kennel Club of £120 per breeder over a three year period. Over recent years a re-structuring of fees has taken place and whilst the scheme still operates at a loss, these losses are considered sustainable. Should the scheme generate an income, then the Kennel Club, as a not-for-profit organisation, would invest any surplus back into projects to advance the welfare of dogs. It is important for the integrity of the scheme that it is not operated as a commercial business.

This allows for members to be disqualified from the scheme at no cost to the Kennel Club, for accreditation fees to be refused from breeders who do not meet our criteria and allows the Kennel Club to review and raise the standards of the ABS, as is done frequently. Within the past six months alone, seven new DNA testing and reporting schemes were incorporated into the scheme, bringing the total to 53 recorded disease tests across 61 breeds, resulting in puppies being born completely free of these diseases.

At the current time Assured Breeders cannot meet all the demands of the puppy buying public, as the scheme has just 5,000 members (providing around 25,000 of the 850,000 dogs sold annually in the UK – or just 3 per cent). However, if there were a strong incentive for more breeders to join the scheme, it would lead to real improvements in terms of dog health and welfare: 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 from the Puppy Awareness Week 2017 survey indicate that many may unwittingly do so.

One in five people (20 per cent) suspect their puppy could have come from a puppy farm and this is likely to be even higher, as 33 per cent would not be confident that they could spot the signs that a puppy had been bred by a responsible breeder, before buying.

One of the main indicators that a puppy may have been bred on a puppy farm is if the puppy is sold without the mother being present, or if the buyer is not shown where the puppy is kept and cared for.

In total, 34% of people who bought a puppy in 2017 did not see the puppy with its mother and 32% did not see its breeding environment. In total 16 per cent suffered financial and emotional hardship as a result of their puppy buying experience.

An important picture has emerged from the research of a nation who make hasty puppy buying decisions, with serious consequences in terms of the choices they make and the subsequent health and welfare of their puppy. One third of people will spend less than 15 minutes choosing a puppy and one in five people admit that they spent no time researching where to buy their puppy at all. However, these hasty and impulsive puppy buying habits are having dramatic consequences. Dogs owned by people who spent more than an hour researching where to buy them from are likely to live twice as long as those who spent under 20 minutes choosing a puppy, with mean mortality ages of 8.8 and 4.3, respectively.

Furthermore, one quarter of pups under six months suffer from conditions ranging from Parvovirus – a potentially deadly disease often associated with puppy farmed dogs – to Kennel Cough, if their owners spent only 6-20 minutes researching where to buy them from. One in ten of these died in their first six months or needed ongoing treatment.

In comparison only 12 per cent of puppies under six months suffered from these conditions if their owners had spent more than an hour researching where to buy.

Similarly, almost half of people (47 per cent) claim to have suffered emotional and financial hardship after buying a puppy if they spend between 6 and 20 minutes researching where to buy their puppy from, compared to 6 per cent who spent more than an hour finding out where they should buy their puppy from.

People are not only failing to invest time in researching where to buy their puppy from, but they are confused about what they should look for, with more than a third of people (34 per cent) saying that they would not be sure where to look for a responsible breeder. The Kennel Club Assured Breeder Scheme makes it easy for people to find responsible breeders, whose standards have already been assessed and if the number of breeders on the scheme were to grow, there would be more puppies available through this route, and the brand awareness would increase amongst puppy buyers. Almost three quarters (73 per cent) say they would be interested in a list of breeders who have already been checked by an independent and UKAS approved body, to help them find a responsibly bred puppy more easily.

The size of the puppy market is vast: there are between 8.5–9 million dogs in the UK with an average life span of 12 years. Around 750,000–850,000 dogs are bred each year, sold for £500 on average (a low estimate) – equating to £350–£375 million at the lower end of our estimate. This data is based on our knowledge that the Kennel Club registers around 30 per cent of puppies in the UK (230,000 puppies) – and from data from the Pet Food Manufacturers Association on their estimates of how many dogs there are in the UK. Further, the RSPCA estimate that 30,000–40,000 puppies are imported from Ireland, and a further 30,000 from continental Europe – however this refers to illegal movement so the data cannot be validated.

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.

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 more acute with dogs bred by Assured Breeders 34% less likely to need to see a vet resulting in veterinary bills that are 27% lower for their owners.

SECTION 4

ADDITIONAL SURVEILLANCE FOR ASSURED BREEDER SCHEME MEMBERS

The additional surveillance mechanisms which are incorporated into the ABS can be summarised as follows:

- **Customer feedback**

Every puppy sold by an Assured Breeder is accompanied by a customer feedback form which provides an opportunity for the customer to inform the Kennel Club about the puppy and their experience with the breeder. Post sales advice and information must be provided to the new puppy owner on immunisation, worming, feeding, grooming, socialisation and exercise, and puppy buyers must be alerted to our complaints procedure. Shortfalls in the number of feedback forms received are investigated and any shortage of forms is checked by way of 'mystery shopper' calls to the new owners (details of new owners are recorded by the Kennel Club). Feedback is collated and recorded and the level of feedback is monitored with action taken if levels are lower than average. Any negative feedback is acted upon, and this will often result in additional inspections, and subsequent action.

- **Litter checks**

Every single litter bred by an Assured Breeder is checked when it is registered with the Kennel Club. These checks provide a vital opportunity to aid the surveillance of breeding practices and identify discrepancies at the earliest possible stage. These checks ensure that the litter complies with regulations affecting the genetic health status of the parents, the minimum/maximum age of the dam, the number of previous litters, date of birth, date of mating, rate of inbreeding, previous caesareans etc. Bitches must not be bred from if they are over 8 years old (even though there is no legal upper age limit), if they have had two caesarean sections, or if they have previously produced four litters even though the legal maximum can be up to six. NB: we currently provide this information upon request and for a small administration fee to any relevant authority. If the ABS is successfully incorporated in a collaborative risk based system, the Kennel Club will provide litter and breeder information on a routine basis to local authorities, which will play a vital role in identifying which breeders are required to hold a licence.

- **Vet health checks**

Every puppy sold by an Assured Breeder must be seen by a vet prior to sale. This ensures transparency on the health status of each individual puppy. This is monitored by the breeder being required to keep a record, and the purchaser is able to inform the Kennel Club (via the feedback form) if a vet check has not taken place. In addition the Assured Breeder is required to include details of the vet check in their contract of sale, a copy of which is checked at the time of an inspection visit.

- **Publishing of litter details**

The details of each litter, including the number of puppies born, names and sexes of puppies, and names of new owners are published by the Kennel Club in our 'Breed Record Supplement'. This information is available in the public domain and is provided free of charge to a number of agencies. This provides further transparency and allows fewer opportunities for breeders to operate 'under the radar'. There is also an effective peer-review system in place whereby discrepancies are reported to the Kennel Club on a regular basis.

- **Health test screening**

Assured Breeders are required to screen their breeding stock, and in some cases their puppies, for signs of hereditary disease. Some of the tests are long standing health schemes with proven efficacy (BVA/KC hip, elbow and eye schemes), whilst others are DNA tests which can give cast iron guarantees that a puppy will not be affected by a known hereditary disease. Members of the ABS must participate in any breed health survey or reasonable health initiative in their breed(s). The collection of health data in all breeds of dog is an urgent priority and the expectation is that any Assured Breeder will assist in this process. We acknowledge that this is a complex area and understand why such detail cannot be incorporated into regulation, but it is vital that it is recognised as an element of a risk based system as it provides essential guarantees to puppy purchasers about the future and long term health of puppies being bred.

- **Buyer selection and after sales service**

Assured Breeders are not permitted to sell to third parties. They are instead required to undertake checks to ensure that the private

purchaser is able to provide a good home for the puppy and that there is a reasonable expectation of offering a permanent home.

- **Ban on third party sales**

Third party selling is effectively puppy dealing, and as such, is not allowed by the Kennel Club. We believe that legitimising third party sales contributes to the increasing problem of puppy farming and buyers not knowing where to get a well-bred puppy. There are many other welfare groups campaigning for a ban on third party sales in all circumstances.

- **Allowing any purchaser to be able to view the puppies with their mother, unless an exceptional and documented reason is provided**

There is no requirement for licensed breeders to do this which makes it easier for irresponsible breeders to mislead puppy buyers. Seeing puppies with their mother in the environment where they were born and reared provides a valuable opportunity for buyers to assess the temperament of the mother, to make an assessment on the interaction between the mother and her puppies, and to also make an assessment of the conditions that the puppies have been raised in. There is a welfare campaign, 'Where's Mum?' which highlights the importance of this and which many welfare organisations support.

- **Commit to help, if necessary, with the re-homing of any dog that they provide within the scheme, throughout the dog's lifetime, for whatever reason**

There is no requirement for licensed breeders to do this, which may result in unwanted puppies and more dogs ending up in rescue. Responsible breeders care passionately about the puppies that they breed and in the event of unforeseen circumstances, where a puppy should need to be rehomed, they have a vital role to play in ensuring that a suitable new home can be found. This provides an additional incentive for breeders to assess the suitability of the potential puppy buyer and their lifestyle and whether the puppy they're seeking is a good fit. It is not unusual for Assured Breeders to have waiting lists of experienced dog owners wanting an older puppy or adult dog.

This list is not exhaustive but does cover the major differences between current breeding and sale of dogs legislation and CIEH model licensing conditions when compared to the standard adopted by the Kennel Club Assured Breeder Scheme.

All of this additional surveillance benefits the long term health and welfare of puppies being bred and, in practice, these additional requirements cannot be effectively audited and assessed within a local authority licensing regime. For example, mandatory breed specific health testing and the scheme's formalised puppy buyer feedback system are both reliant on an underpinning, transparent puppy registration system.

Integration of the Assured Breeder Scheme within the licensing framework therefore provides an opportunity for recognition of these additional, auditable measures which will improve welfare and/or provide additional benefit to customers (and with respect to dog breeding establishments, the puppies being produced).

A full gap analysis comparing the ABS standards to model licensing conditions is available from the Kennel Club on request.

SECTION 5

INCORPORATING THE ASSURED BREEDER SCHEME INTO THE LICENSING FRAMEWORK IN PRACTICE

As we noted earlier, we understand that there were initial concerns regarding ‘exempting’ breeders certified by a UKAS accredited body from having to receive a local authority licence for reasons including concerns about powers available to scheme operators; confusion for the public about who to complain to; transparency of schemes i.e. the ability to request inspection reports through freedom of information (FOI) requests; and generally the need to avoid a ‘two-tier’ system.

By working with local authorities we have developed a proposal that we hope addresses the concerns raised; incorporates the inherent advantages of a scheme run by a body accredited by UKAS; and removes the disincentives of being regulated by both a UKAS accredited body and a local authority. We hope it is viewed as a best of both worlds solution. The proposal is as follows:

- **Step 1** – Routine inspections of establishments belonging to members of the Assured Breeder Scheme (more generally, schemes regulated by UKAS accredited bodies) would be conducted by the scheme’s trained and accredited assessors. These inspections would gather the required evidence to demonstrate compliance to the local authority licensing conditions (model licensing conditions), alongside any additional requirements specific to the Assured Breeder Scheme (or alternative schemes regulated by other UKAS accredited organisations).
- **Step 2** – The completed inspection report would then be submitted to the relevant local authority with a ‘general administration fee’ (we understand this model is already under consideration), assuming compliance to licensing conditions had been met, and then the local authority would grant an establishment a licence, in accordance with the risk category the establishment fell into.

In the event that an ABS member was disqualified or left the scheme, the Kennel Club would alert the local authority in order that they were aware that they had responsibility for inspecting that breeder and in the unlikely circumstance where an ABS member was disqualified for breach of local authority licensing requirements, this would be flagged to the local authority so they would have the evidence to take immediate and appropriate action.

In the event that a complaint was made to a local authority about an ABS member, the local authority could alert the Kennel Club in order that an ABS assessor could inspect. However as the local authority would remain the licensing authority, they would retain enforcement powers and the right to inspect establishments.

This improved collaboration between the ABS and local authorities would benefit:

- **Campaigners**

Transparency in the licensing system would be retained as campaigners would be able to make FOI requests to local authorities for inspection reports submitted to them.

- **Members of the public**

They would be able to lodge complaints with either the council or the UKAS accredited body. We would expect complaints about members of a scheme accredited by UKAS to be dealt with by the responsible organisation in the first instance (because as part of UKAS accreditation a robust complaints procedure must be in place); but for UKAS accredited scheme operators to be obliged to keep the local authority updated regarding significant concerns or disqualifications etc. This would reduce the burden on local authorities.

- **Licensed establishments affiliated to a body accredited by UKAS**

They would have the benefit of avoiding duplicate inspections (with the associated cost implications) and additional paperwork etc. Kennel Club Assured Breeders are already subject to continuous monitoring through our formal puppy buyer feedback system so it seems counterintuitive that those operating to the highest standards would be required to undergo more frequent inspections (if subjected to separate local authority and UKAS operator inspections).

- **Low volume breeders and responsible breeders**

This model is likely to give a greater incentive to those for whom dog breeding is something they do a few times a year rather than a full

time operation. For many, a low volume home breeder is seen as the ideal source of a family pet, but the message we receive repeatedly is that these breeders will be put off breeding if they have to go through the local authority licensing system. This is not because they do not believe they can achieve the requisite standards, but due to cost, perceived experience of local authority inspectors etc. Certainly these breeders will struggle to justify paying for two separate inspection regimes. This is concerning since it is precisely these dog breeders that our organisation (and many others) would direct potential puppy buyers to at the moment. Of course, reducing unnecessary red tape will be desirable to all licensed establishments. Responsible breeders breeding in greater volume will receive a financial incentive for joining the scheme – where currently there is no real incentive (as they are able to sell their puppies easily outside of the scheme).

- **Local authorities**

We believe the model outlined above provides the framework which any generic scheme run by a UKAS accredited body can sit within, and integrate with the local authority licensing regime. It provides local authorities with overall control of the system; greater intelligence provided by the ABS about breeders within their area; a guaranteed income from more breeders (reduced for members of the ABS); and a reduced burden on already stretched resources to carry out duplicate inspections.

The other half of the equation is how to formally recognise additional auditable, beneficial steps taken by 'licence holders', which (certainly within the dog breeding establishment licensing pillar) can realistically only be assessed by a UKAS accredited body such as the Assured Breeder Scheme. This is explained in the next section.

SECTION 6

**LOCAL
AUTHORITY
TRIALS**

We set up trials with a number of local authorities in order to see if our proposal could work in practice. In doing so we shared information with them about:

1. ABS members in their area in order that they knew those breeders had been inspected prior to breeding (the vast majority of ABS breeders breed under the current threshold)
2. Registration data for breeders in their area breeding at the current licensing threshold of five litters per year in order that they could ensure those breeders were already licensed
3. Registration data for breeders in their area breeding three and four litters per year in order that they could determine how many more breeders would require a licence when the thresholds are reduced.

In addition to this we invited a representative of each local authority to accompany an ABS assessor on an inspection, and asked that one of our assessors be able to attend a local authority inspection in order that we could compile a gap analysis. All we required from local authorities were the postcode areas they covered.

We targeted local authorities who were in contact with us at the time to request information about breeders in their areas and the 10 per cent of local authorities (in England only) which license five litters a year or more. These are local authorities which are therefore more active than many others when it comes to licensing. We approached them and rolled out the project on a first come first served basis to ten local authorities. We extended this to more after the trials began. We selected English local authorities as Defra was considering a risk based licensing system incorporating members of schemes run by UKAS accredited bodies. At the time of writing however, we are in discussions regarding trials for Welsh local authorities.

The statistics demonstrated to the local authorities that took part in the trial that when licensing thresholds are reduced the workload of local authorities will significantly increase.

The statistics also demonstrate that it is unlikely local authorities are licensing all the breeders they should in most areas. In some areas our database uncovered more breeders breeding at the current threshold than local authorities license. It is estimated that the Kennel Club registers somewhere between between 30 and 40 per cent of puppies born in the UK. It is likely therefore that many volume breeders are slipping through the net.

Whilst there are not a high number of ABS members in any local authority area (with a spread of around 5,000 across the whole of the UK), the recognition of the scheme within the licensing regime should encourage existing breeders to join as they become aware of it. This should reduce the number of local authority inspections required in the future (as a result of reducing the licensing thresholds) to a more manageable level.

Local authority area	ABS members in local authority area	Number of breeders breeding over 5 litters a year on KC database	Number of breeders breeding 3 or more litters a year on KC database	Increase in number of breeders requiring a licence at a threshold of 3 litters a year based on KC database and the number of local authority licences currently issued	Number of breeders the local authority licenses currently
Amber Valley	15	4	41	8 fold increase	5
Breckland	26	9	54	8 fold increase	*7
West Lindsey	17	12	35	2.5 fold increase	13
Charnwood	9	1	18	9 fold increase	2
East Northamptonshire	5	1	15	15 fold increase	1
Blaby District	5	2	10	5 fold increase	2
Aylesbury Vale	14	1	25	Currently issue no licences and will have to issue 25 at a minimum.	*0
South Somerset	10	1	11	11 fold increase	1
Cheltenham	6	1	12	6 fold increase	2
Basildon	2	7	26	2.5 fold increase	10
Stoke on Trent City	9	7	21	4 fold increase	*5
Melton	15	4	21	7 fold increase	*3
North Devon	4	3	17	3.5 fold increase	5
North Kesteven	3	4	18	3 fold increase	6
South Derbyshire	11	3	23	2 fold increase	11
Medway	8	1	20	Currently issue no licences and will have to issue 20 at a minimum	*0
Horsham	11	4	19	4 fold increase	5
East Lindsey	21	12	60	5 fold increase	12

* indicates where the number is lower than the number the KC found

SECTION 7

SUGGESTED LICENSING MODELS - HOW THE ASSURED BREEDER SCHEME FITS

The following models are based on a star rating. We believe that a 4th star level could be reserved for establishments which demonstrate compliance to the highest standards within the local authority risk framework, but also demonstrate compliance to additional beneficial standards.

There are various options to achieving this including:

1. Specifically identifying the Assured Breeder Scheme (or other scheme run by organisations with UKAS accreditation) within the regulations. The regulations could be drafted in a manner which allows the Secretary of State to designate schemes as delivering additional benefits to allow access to the 4th star level. This would be a simple message to dog breeders and local authorities.
2. Alternatively, additional welfare markers could be incorporated into the risk based system (health testing/formal surveillance measures). Awarding 'points' or otherwise to establishments able to demonstrate achievement of these measures. These additional points would allow a licensed establishment to be elevated from the 3rd star tier into the 4th star tier. This would be more complex.

4 STARS



Assured Breeders

Standard	Highest standards within LA framework + additional auditable standards
Total score	25+
Inspection regime	Members of a scheme run by an organisation accredited by UKAS to certify breeders would continue to inspect to additional requirements than the local authority and share inspection reports with the relevant local authority. Currently reserved for the Assured Breeder Scheme (since this is the only breeders scheme which can certify breeders).
Licence fee	Further reduction

3 STARS



Standard	Highest standards (Level 3 Business)
Total score	20-24
Inspection regime	Every 3 years (one unannounced visit in 3 year period)
Licence fee	50% reduction in licence fee

2 STARS



Standard	Additional Standards (Level 2 Business)
Total score	12-19
Inspection regime	Inspection every 2 years (one unannounced visit in 2 year period)
Licence fee	25% reduction in licence fee

1 STAR



Level	Minimum Standard (Level 1 Business)
Total score	8-11
Inspection regime	Inspection every year (one unannounced visit in 12 month period)
Licence fee	Full licence fee

MINOR FAILINGS (an existing premises that is failing to meet minimum standards, potentially under improvement notice)		MINIMUM STANDARDS (as laid down in the schedules and guidance)		HIGHER STANDARDS (as laid down in the guidance)		BEST PRACTICE (as laid down in the guidance)	
High risk*	Low risk**	High risk	Low risk	High risk	Low risk	High risk	Low risk
0	0	1 STAR	2 STARS	3 STARS	4 STARS	5 STARS	n/a
1 year licence	1 year licence	1 year licence	2 year licence	2 year licence	3 year licence	3 year licence	3 year licence
Minimum 1 unannounced visit within 12 month period	Minimum 1 unannounced visit within 12 month period	Minimum 1 unannounced visit within 12 month period	Minimum 1 unannounced visit within 12 month period	Minimum 1 unannounced visit within 24 month period	Minimum 1 unannounced visit within 36 month period	Routine inspection plus additional inspection on complaint/ other intelligence	
Option for full costed re-inspection	Option for full costed re-inspection						
**Low risk							
<ul style="list-style-type: none"> • New business (no history) • Poor compliance history (possible previous formal intervention) • Complaints received • Only meeting minimum requirements within schedules for Standard Operating Procedures, records etc. 							
<ul style="list-style-type: none"> • Excellent compliance history • No complaints • Member of scheme run by UKAS accredited body including inspection • Excellent SOPs, records etc. – above minimum requirements within schedules • Ongoing surveillance 							



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