Kennel Club Response to the Home Office’s draft guidance on the operation of the Animals (Scientific Procedures) Act 1986 (ASPA) Consultation.

Submitted on 15 March 2013 by: The Kennel Club, 1-5 Clarges Street, Piccadilly, London W1J 8AB, tel: 020 7518 1020, email: denisa.delic@thekennelclub.org.uk

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

It runs the country’s largest registration database for both pedigree and crossbreed dogs and the Petlog database, which is the UK’s biggest reunification service for microchipped animals. The Kennel Club Assured Breeder Scheme is the only scheme in the UK that monitors breeders, in order to protect the welfare of puppies and breeding bitches. It also runs the UK’s largest dog training programme, the Good Citizen Dog Training Scheme and licenses shows and clubs across a wide range of activities, which help dog owners to bond and enjoy life with their dogs. The Kennel Club runs the world’s greatest dog show, Crufts, and the Discover Dogs event at Earls Court, London, which is a fun family day out that educates people about how to buy responsibly and care for their dog.
The Kennel Club invests in welfare campaigns, dog training and education programmes and the Kennel Club Charitable Trust, which supports research into dog diseases and dog welfare charities, including Kennel Club Breed Rescue organisations that re-home dogs throughout the UK. The Kennel Club jointly runs health screening schemes with the British Veterinary Association and through the Charitable Trust, funds the Kennel Club Genetics Centre at the Animal Health Trust, which is at the forefront of pioneering research into dog health. The new Kennel Club Cancer Centre at the Animal Health Trust will contribute to the AHT’s well-established cancer research programme, helping to further improve dog health.

1. Overall, is the guidance clear?

The Kennel Club believes that the draft guidance which replaces the older ‘Guidance on the Operation of Animals (Scientific Procedures) Act 1986’ is both clear in its layout and structure.

The different sections are laid out in a logical manner and written in non-technical terms which will help to be easily understood by both the public and the scientific community. For example, the principles of replacement, reduction and refinement (3Rs) is one that the Kennel Club supports and is pleased to see outlined and promoted within the guidance. The guidance clearly states to project licence holders to ensure their work programme does not involve animals being used in procedures where there is a scientifically satisfactory alternative method available.

The Kennel Club also found the guidance particularly clear on the authorisation of project licences for the use of dogs, cats and equidae in scientific procedures. The guidance explains that licences involving these animals will only be granted where the purpose of the programme can only be achieved by their use or in circumstances where it is not practicable to obtain other suitable animals.
In addition, a glossary of terms has been included which also aids in ensuring that all technical terms relating to the newly revised ASPA legislation are clear and understood properly within the text of the guidance.

2. Are there any sections that are unclear or difficult to understand? If so, which ones?

The Kennel Club does not feel there are any unclear or particularly difficult sections to understand. The guidance is considered to be user friendly and provides both advice on what the newly revised Animals (Scientific Procedures) Act covers and guidance to holders of project licences, personal licences, establishment licences and new licence applicants. Furthermore, the guidance also explains the current UK Codes of Practice.

Ultimately, the guidance provides clear advice on the new requirements and changes in the revised Animals (Scientific Procedures) Act as well as guidance on the accommodation and care of animals, humane killing, severity classification and the current UK Codes of Practice.

3. Is it easy to find what you are looking for?

The guidance is separated into different sections which are all outlined on the contents page helping create a user friendly guide.

4. Is the guidance organised in the best way?

The Kennel Club believes that the guidance is organised in a logical fashion
which compliments its purpose of providing guidance and advice on the revised ASPA legislation.

The first section provides background information to ASPA which helps the reader understand the changes in their context enabling a better grasp of the new changes and requirements. The following section explains the 3Rs principles of replacement, reduction and refinement and how and when they should be applied as a means of reducing the number of animals used in scientific experiments or to at least minimise the suffering involved in any experiment.

The sections after the introductory parts specifically relate to the various licences that are needed and provide information on different issues including severity categories as mentioned above. The guidance then continues to cover other aspects of ASPA which include the training and duties of different individuals, including the Named Veterinary Surgeons and Named Animal & Welfare Officers.

The final sections of the guidance cover the remaining aspects of the revised ASPA legislation which include the Home Office inspections, Science Committees, Animal Welfare and Ethical Review Bodies and other miscellaneous issues.

5. If not, please suggest how this could be improved.

N/A

6. Does the guidance explain what you need to know?

The Kennel Club believes that since the guidance covers a wide range of topics, it helps explain a number of different issues.
The guidance was prepared for anyone who is involved with animals that are used for scientific procedures. This can include individuals who not only work with animals in experiments, but also those that breed animals to be used for experiments, inspectors of premises, project/personal/establishment licence holders, various committee members as well as others with an interest in this area.

From a dog welfare perspective, the guidance has covered various issues surrounding the use of canines in scientific experiments, including forbidden and permitted procedures, matters relating to accommodation, sourcing, record keeping, disposal and killing methods.

For example, the section on permissible procedures on animals used in scientific experiments was clear and concise which helps to clarify and distinguish to both the public and scientific community which experiments are acceptable and allowed for each animal.

Furthermore, the section on sourcing animals is helpful in outlining what restrictions there are using certain types of animals in procedures unless there has been a specific authorisation granted. The Kennel Club is particularly supportive of the inclusion of the special protection for dogs and cats which has been kept during the transposition of the EU Directive. However, exemptions can be applied in these circumstances which has also been explained in the guidance.

Lastly, the animal care and accommodation section was also valuable in advising how to provide the best care for the animals and ensure their safety and protection at an appropriate level as each animal has different needs from the other.
7. Is there anything that should be there that is missing?

The Kennel Club can only speak from a dog/companion animal welfare perspective and as such does not believe that there is anything significant missing from the guidance.

8. Is there anything we haven’t included which would be helpful for you to know about?

No

9. Do you have any other comments?

None