

## **Written evidence submitted by The Kennel Club (PS0004)**

### **Local Authority Survey**

The Kennel Club commissioned Dods to survey local authorities in order to get a breakdown of how many dog breeding licences were being issued across the country, the type of breeder applying for a licence (i.e. high volume or low volume breeders), and whether this was different prior to October 2018 when the Animal Establishments (Licensing of Activities Involving Animals) Act was introduced.

### **Findings – key statistics**

- Between September 2017-September 2018 local authorities issued 980 licenses
- Between April 2019 – April 2020 local authorities issued 1727 licences
- As a result of changes to dog breeding Regulations the number of licenses issued increased by 747 (76 per cent)
- Of those 1727 licences issued, 675 (40 per cent) were issued to 1-2 litter breeders and 1052 (60 per cent) to 3 plus litter breeders
- The significant increase in licenses issued has disproportionately targeted 1-2 litter breeders as we estimate only 72 more 3 plus litter breeders are now licensed
- The increase in licences issued is significantly less than Defra’s impact assessment estimating that around 5000 breeders would require a licence post October 2018

### **Kennel Club data – key statistics**

- The increase in licences issued is significantly less than the Kennel Club’s impact assessment, based on registration data and the Kennel Club registering one third of puppies bred, which estimated 4377 breeders breeding 3 litters or more requiring a licence, and an unknown quantity of one and two litter breeders.
- Over the year following the introduction of the licensing Regulations in England we saw 18,000 fewer puppies being registered with us. Given that Kennel Club registered puppies make up around one third of the annual supply, we believe over 50,000 fewer puppies were bred by low volume breeders in the year following the implementation of the new breeding Regulations.

### **Kennel Club breeder data from 1,500 dog breeders who applied for a dog breeding licence**

- 75% of breeders get their information about dogs and breeding from the KC;
- 89% of breeders consider themselves hobby breeders
- 85% did not have a dog breeding licence prior to October 2018. 50% breed less than 1 litter per year and 37% breed 1-2 litters per year
- 27% are ABS members – 90% for more than 3 years
- 33% of breeders had to comply with conditions such as planning permission; companies house registration; public liability insurance; implementing noise reduction measures;

applying for business insurance; paying for business refuse collection etc, prior to being issued a licence;

- 65% of breeders do not rely on advertising pups for sale because they have waiting lists. Only 17% advertise on commercial websites and 25% on their own website. Over 80% use non-commercial websites such as KC's find a puppy service or 'I breed pedigree dogs';
- Of those breeders who have been inspected by a local authority nearly half (46%) were not confident or not at all confident that their inspector was knowledgeable about dog breeding; almost half (48%) were not confident or not at all confident that their inspector understood the difference between a business and a hobby breeder and over 40% (41%) were not confident or not at all confident that they understood or had applied a business test proportionate to their circumstances

## **Conclusions**

- Local authorities are falling short with regards to how many licences are being issued
- Low volume breeders are breeding fewer puppies
- Most high volume breeders remain to be breeding illegally, without a licence
- High volume breeders are most likely making up for the shortfall of puppies being bred by low volume breeders

## **How Defra and the Kennel Club can help local authorities**

### **i. Defra - remove the business test**

The business test is resulting in one and two litter breeders requiring a licence. To target the higher volume breeders and to remove the ambiguity as to whether a one or two litter breeder is a 'business', we propose the business test is removed and that a litter licence threshold of 3 litters per year remains in place (as is the case in Scotland and Wales).

Removal of the business test would mean local authorities could focus their limited resources purely on volume breeders, most of whom are still operating under the radar.

Removing the business test would take 675 breeders out of the dog breeding regime.

### **ii. Kennel Club - full integration of the UKAS Accredited Assured Breeder Scheme into the Regulations**

Currently Assured Breeders are recognised within the Regulations to the extent that they should be recognised as a low risk, high welfare breeder and therefore achieve a higher star rating. However despite being inspected by a trained Kennel Club Assessor, they must also be inspected by a local authority inspector. Full integration of the ABS would mean that:

- 1) Routine inspections of establishments belonging to members of the Assured Breeder Scheme would be conducted by the scheme's trained and accredited assessor and gather evidence to demonstrate compliance to the local authority licensing conditions, alongside any additional requirements specific to the ABS
- 2) Should the AB require a licence (e.g. if they breed 3 or more litters per year), they would submit their completed inspection report to the relevant local authority with a 'general administration fee' (as opposed to a full licensing fee)
- 3) Assuming compliance to licensing conditions had been met, the local authority would grant a licence, in accordance with the risk category the establishment fell into e.g. an AB meeting the scheme's higher standards would be classified as low risk.

This would avoid a duplicated inspection from a local authority and the associated cost of that inspection. 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, though the local authority would remain the licensing authority and retain enforcement powers.

376 Assured Breeders bred 3 or more litters within the 2018-2019 period. If the Assured Breeder Scheme were to enjoy greater levels of integration with the current licencing regime, these 376 breeders would no longer be a burden on the resources of local authorities as the Kennel Club could inspect these breeders on local authorities' behalf.

**If the business test were removed, and the ABS was integrated in to the licensing regime this would take at least 1000 breeders out of the current licensing regime, equating to around 20 per cent of local authorities workload (they would be required to carry out 4000 inspections instead of 5000, and would have more capacity to target higher volume breeders)**

### ***Impact of Covid-19 on supply and demand:***

#### Lockdown statistics

- First week of lockdown (March 23<sup>rd</sup> – March 29<sup>th</sup> 1,390,777 FAP searches)
- Lockdown (March 26<sup>th</sup> to end of May) – 22,695,041 FAP searches, compared to 8,464,013 searches during the same period in 2019 (168% increase)
- May saw the biggest increase – 237% increase in searches for puppies compared to May 2019
- 161% increase compared to 2019 of people searching for puppies from beginning of lockdown until the end of August

#### FAP searches 2019-2020 compared

- March
  - 2020 – 5,709,957
  - 2019 – 4,375,285
- April
  - 2020 – 8,782,175
  - 2019 – 3,651,015
- May
  - 2020 – 12,522,089
  - 2019 – 3,791,177
- June
  - 2020 – 11,328,866
  - 2019 – 3,399,697
- July
  - 2020 – 8,454,579
  - 2019 – 3,282,297

### **Impact of Lucy's Law and 'Petfished' campaign**

- 46% of puppies bought through an online pet shop or directly over the internet got sick before their first birthday, including gastro-intestinal problems, external skin problems and other fatal illnesses

*Figures below are from a survey carried out by the Kennel Club of over 2,500 new dog owners*

- 32% of lockdown puppy buyers didn't see the puppy before money was paid

- 29% didn't see the family home where the puppy was bred
- 12% didn't see the puppy's mother or suspect the mother was fake
- 29% of people said they wouldn't know how to spot signs of a rogue breeder
- 24% of pandemic puppy buyers think their puppy could have originated from a puppy farm
- 42% didn't see the puppy's breeding environment, in real-life or via video call