

**Welsh Government Consultation Document
Third Party Sales of Puppies and Kittens**

Response of the Communication Workers Union

To:- Animal Welfare & Framework Branch
Welsh Government
Cathays Park
Cardiff CF10 3NQ
email: companionanimalwelfare@gov.wales

This is the response of the Communication Workers Union who represents 200,000 Workers and is the UK's largest Communications Union in the UK. The CWU represents 10,000 workers in Wales, the majority employed by Royal Mail, Parcelforce and British Telecommunications Group.

The CWU considers itself to be the National Number 1 stakeholder in respect of Dog Attacks and Dog Control as the organisation's membership suffers the largest number of Dog Attacks on its membership with over 3000 dog attacks on Postal Workers a year, across the UK. 850 Postal Workers in Wales have been attacked by dogs in the last 5 years

The CWU is pro-dog and is anti-bad dog owner. We are also opposed to uncontrolled and unscrupulous breeding and selling of dogs by bad breeders and sellers and we support the proposal to ban the third party sale of dogs. Dogs should only be available from reputable, licensed, regulated breeders, linked to organisations such as the Kennel Club and Breed Clubs and Organisations who maintain the upkeep of high standards of good temperament and welfare standards. Our view strongly is that Dogs should only be available from licensed, regulated breeders or approved rehoming organisations

The CWU understands that the RSPCA, Cats Protection, International Fund for Animal Welfare, Canine Action UK, C.A.R.I.A.D, the BVA/BSAVA, Dogs Trust, Kennel Club, PDSA, and Battersea Dogs and Cats Home have collectively cited welfare concerns with third-party sales such as lack of socialisation, increased risk of disease and increased behavioural issues.

There is clear evidence that the sale of puppies and kittens via third parties has the potential to contribute to an increased risk of disease, lack of socialisation and bad temperament than when people buy directly from a good, licensed, breeder who in the main we would hope, is more likely to care about the dogs and the people they sell them to.

Behavioural issues and bad temperament in Dogs is an obvious concern for the CWU due to the number of dog attacks on our members brought about by the lethal combination of irresponsible owners with bad temperament dogs, one perpetuating the other. Responsible breeding is not just about producing animals but also preparing them for their (and their owners') future lives, how they will fit in with their family and society.

We strongly support the Proposal from the Welsh Government to drive out unethical breeding and selling of dogs but the view of the CWU is that this change should be part of a holistic approach to Dog ownership and Dog Control.

The licensing and inspection of anyone breeding or selling puppies must be robust and consistent and by someone fully trained in animal welfare, backed up by a well resourced enforcement regime or of local authority Dog Wardens/Inspectors.

The Wales Government will need to regulate rehoming organisations and sanctuaries to ensure 'Puppy Farms' don't masquerade themselves as a rehoming centre or charity in order to get round the new system of banning third party sellers, so profits can continue to be made by unscrupulous individuals.

There needs to be registration and licensing of all breeding and rehoming establishments to create full transparency and traceability in the system, ensuring that they are brought onto the local authority's radar.

If the Ban does come into force, inadequate penalties for those in breach will not make it work. The unscrupulous money-makers will remain unfazed by the inadequate penalties and will not be deterred

A clamp down needs to be made on puppies illegally imported into the country for sale as another way corrupt breeders abuse the system.

The Wales Government has introduced Breeders Licensing. The next step should be;

- Ban third party dog selling,
- Dog Licences for all owners,
- Potential Dog Owner should be required to purchase a dog license and present it to the Breeder when making the purchase with the Breeder being required to check and record the Licence number against the bill of sale.
- The Dog Purchaser should also be required to provide a Colour and Tag with owners name and address on it as required by the Control of Dogs Order 1992, at the time of purchase.
- The Welsh Government should also introduce Dog Control Notices (DCNs) and
- Introduce a system of Fixed Penalty Notice for lower level dog law breaches to help improve Dog Control.

o o o o O o o o o

Submitted by:-

Dave Joyce

National Health, Safety & Environment Officer

Communication Workers Union

150 The Broadway

Wimbledon

London SW19 1RX