



Llywodraeth Cymru  
Welsh Government

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Welsh Government  
Consultation – summary of response

## **Licensing of Animal Welfare Establishments, Activities and Exhibits**

Summary of responses to public consultation on the Licensing of Animal Welfare Establishments, Activities and Exhibits - Development of a national model for the regulation of animal welfare

December 2024

Mae'r ddogfen hon ar gael yn Gymraeg hefyd / This document is also available in Welsh  
Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg / We welcome correspondence and telephone calls in Welsh

## **Action Required**

This document is for information only.

## **Further information and related documents**

Large print, Braille and alternative language versions of this document are available on request.

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## **Additional copies**

This summary of response and copies of all the consultation documentation are published in electronic form only and can be accessed on the Welsh Government's website.

Link to the consultation documentation: [Licensing of animal welfare establishments, activities and exhibits](#)

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## Introduction

We would like to thank all individuals, businesses, charities, local authorities, and organisations who took the time to consider and respond to this consultation. Your collective input is invaluable in helping to inform our next steps and determine future licensing priorities.

It is not the intent, nor would it be possible, to reflect every comment received in this summary of responses. The purpose is to give an overview of the responses and give an indication of the kinds of issues and concerns raised in relation to the questions we asked.

Consultation is an essential part of the policy-making process, providing an opportunity to collect evidence, consider varied opinions and utilise expertise. Partnership working is key to achieving our collective ambitions and your views, submissions of evidence and information have assisted in developing a way forward.

The following 'Summary of Responses' is the result of extensive analysis of the responses received, which will help to inform our future 'Next Steps.'

## Executive Summary

- The twelve-week public consultation on proposals to license animal welfare establishments, activities and exhibits was launched on 08 December 2023 and closed on 01 March 2024.
- It built on an earlier targeted call for evidence, carried out with Welsh Local Authorities, our Local Authority Enforcement Project and our Animal Welfare Networks. The call for evidence identified gaps in existing legislation and produced a priority list of areas for further consultation. Together, they formed the first phase of development of a national model for the regulation of animal welfare, which is a Programme for Government commitment.
- At present, most animal welfare establishments, activities and exhibits operating in Wales are unregulated, industry regulated, or, in lesser cases, subject to minimal, often outdated regulation only.
- The Animal Welfare Act 2006 affords some blanket protections, but it is not a statutory function of the Welsh Local Authorities, and they are therefore often constrained in their ability to intervene where needed.
- Proposals for a national model were borne out of concern that without regulatory oversight, consistency of standards, appropriate support, guidance, and mechanisms for intervention, instances of neglect, mismanagement and overwhelm will occur (and do occur) in varied establishments, activities and exhibits operating in Wales.

- The earlier call for evidence, with our operational bodies and sector stakeholders, provided a strong foundation in identifying a list of activities, establishments and exhibits which could benefit from an update to, or introduction of, regulation.
- Four key themes were subsequently established for the consultation – animal welfare establishments, animal activities, animal exhibits and racing dogs. This final category was also included in recognition of significant and ongoing public interest in the welfare of racing greyhounds.
- This report summarises responses to the 2023-2024 consultation and will inform the Welsh Government's next steps.
- There were 1180 responses to the consultation. This included 344 via email and 836 via the online response form. Of the 1180 total responses, 292 were identical email responses received as part of a campaign by the League Against Cruel Sports (this figure included League Against Cruel Sports response) and concentrated on questions 4 and 5.
- Consultation respondents were asked to consider 8 questions. In order, these related to animal welfare establishments (Q1), animal activities (Q2), animal exhibits (Q3), licensing for racing dog trainers/keepers/owners (Q4), evidence for or against a phased ban on greyhound racing (Q5), and the impact on the Welsh language (Q6 and 7). Question 8 was a final, free-text opportunity to expand on previous questions or air further views.
- Broadly, and across questions, respondents agreed that many establishments, activities, and exhibits could benefit from a consistent form of regulation or setting of standards under a national model – whether full blown licensing or light touch registration. There was consensus that regulation needed to be proportionate, fit for purpose and activity-specific, supported by a consistent, adequately resourced and qualified enforcement framework.
- Several respondents expressed surprise that regulation did not already exist and identified a gap between public expectation and the reality (a lack of regulation). Conversely, others pointed to existing legislation, most often the Animal Welfare Act 2006 and industry regulation, and queried why further regulation was therefore required.
- Respondents in agreement of licensing proposals agreed a national model could:
  - Improve animal health and welfare
  - Introduce consistency of standards
  - Establish effective enforcement
  - Provide businesses with guidance and support
  - Build public trust and provide reassurance
  - Ensure accountability
  - Reduce instances of neglect, mismanagement and overwhelm

- Respondents who were unsure or against licensing proposals suggested:
  - Existing legislation is sufficient
  - Evidence is lacking
  - Licensing could cause undue financial, regulatory or administrative burden
  - The activities covered (in the consultation) were too broad to provide meaningful comment
  - Favoured a lighter touch approach (such as registration), an outright ban, or the status quo (no further regulation).
  
- Question 1 on animal welfare establishments – respondents gave a majority “yes” response and there was consensus that animal welfare establishments should be regulated as a priority.
  
- Question 2 on animal activities – respondents gave a majority “yes” response however these were more nuanced and there was an overall feeling that animal activities should not be blanket licensed, and instead considered on a hierarchy of regulatory need and potential effectiveness. Respondents largely agreed that activities such as pet grooming and animal behaviourists would benefit from licensing whilst other activities, such as dog walking, need a lighter touch approach.
  
- Question 3 on animal exhibits – respondents gave a majority “yes” response however there was inconclusive evidence to prioritise animal exhibits licensing, with several respondents acknowledging it was lower priority and a significant proportion of respondents calling for an outright or activity-specific ban(s) on animal exhibits in Wales.
  
- Question 4 on the licensing of trainers/keepers and owners of racing dogs, respondents gave a majority “yes” response indicating concern that the welfare of racing dogs is currently not sufficiently protected. A significant proportion chose “no.” Among these responses, many felt that current industry-led regulation is sufficient, while others calling for a phased ban argued that no form of licensing could adequately protect racing dogs and called for the abolition of greyhound racing.
  
- Question 5 on a phased ban of greyhound racing – we asked for views and evidence to support the justification for or against a phased ban. There was significant strength of feeling in the responses with a higher proportion of respondents supporting the opinion that consideration should be given to a phased ban on greyhound racing in Wales. There was substantial support in many responses for ensuring any actions taken are measured, allowing thorough consideration of the consequences. There were strong opinions on both sides, with opponents of a phased ban emphasising the need to consider social, economic, and cultural factors and those in favour outlining welfare concerns associated with greyhound racing. Anecdotal evidence and publicly available industry statistics were submitted in responses to support the justification for or against a phased ban.

# 1. The Consultation Exercise

## 1.1 Background Information

Animal Welfare is a Welsh Government priority, and our ambition is for all animals in Wales to have a good life. This ambition is reflected in the current Programme for Government (PfG), which includes four animal welfare commitments spanning farmed, companion and other kept animals. Our [Animal Welfare Plan for Wales 2021-2026](#) (AWPW) sets out how we will implement these commitments.

Our first commitment is to 'Develop a national model for the regulation of animal welfare, introducing registration for animal welfare establishments, commercial breeders for pets or for shooting and animal exhibits.'

Activities in scope of the consultation were varied, ranging from rescues, sanctuaries and rehabilitation centres to pet services (including grooming, walking, day care and boarding) to equine services, human-animal engagements and animal exhibits. In recognition of significant public interest in the welfare of racing greyhounds, two additional questions were included relating to the licensing of greyhound keepers/breeders/trainers and a potential phased ban on greyhound racing.

## 1.2 Current Position in Wales

Animal Welfare Establishments, Activities and Exhibits are diverse and there is no standard licensing regime or requirement for routine inspection.

The Animal Welfare Act 2006 ("the 2006 Act") places a duty of care on anyone responsible for an animal, to ensure its welfare. Any person responsible for an animal, whether on a permanent or temporary basis, must take reasonable steps to ensure that the needs of an animal are met at all times.

The Animal Welfare (Licensing of Activities Involving Animals) (Wales) Regulations 2021 (LAIA) requires that any person carrying out the sale of animals as pets in Wales (including a ban on the commercial third-party sale of puppies and kittens) in the course of a business must obtain a licence from the Local Authority where their premises are situated.

The Animal Welfare (Breeding of Dogs) (Wales) Regulations 2014 introduced stricter criteria for licenced breeding establishments.

Home boarders that board animals as a business are currently required to be licensed under The Animal Boarding Establishments Act 1963 however there is a loophole in this legislation in that under "the main activity of the person's business" any dog trainers and dog groomers who also board dogs as an extra service do not need to be licensed.

Some exhibits are registered under The Performing Animals (Regulation) Act 1925. This is a lifetime registration with no specific inspection requirements. As such, it is unlikely that the welfare standards of many of Wales' performing animals are regularly assessed.

Some exhibits may be licensed under the Dangerous Wild Animals Act 1976 if they own or keep a species listed under that Act. However, an inspection by enforcers may not necessarily consider the welfare standards of other animals included in an exhibit if not covered by the Dangerous Wild Animals Act 1976. Under the Riding Establishments Acts 1964 and 1970, riding establishments are required to be licensed by Local Authorities.

It is envisaged any new licensing requirements would be introduced under the [Animal Welfare \(Licensing of Activities Involving Animals\) \(Wales\) Regulations 2021](#) (LAIA) which currently governs the sale of animals as pets. A national model may also bring other licensing under revised LAIA regulations where it is determined to be outdated, inflexible or insufficient for present day needs.

### **1.3 Public Consultation**

This consultation ran for 12 weeks from the 8<sup>th</sup> December 2023 until the 1<sup>st</sup> March 2024. The consultation was published on the Welsh Government website.

### **1.4 Consultation Questions**

Respondents were asked to consider the following questions and provide reasoning:

1. Do you agree that Animal Welfare Establishments (animal sanctuaries and animal rescue and rehabilitation centres) should be subject to licensing?
2. Do you agree that Animal Activities (human engagement services, doggy day care, dog walking, home boarding, livery services etc) should be subject to licensing?
3. Do you agree that a licensing scheme be introduced to strengthen existing legislation re animal exhibits i.e. people who take animals to parties such as reptiles, birds of prey centres or other travelling and static animal exhibits?
4. Do you agree that owners and/or keepers or trainers of racing dogs (including greyhounds) should be subject to licensing?
5. We are aware of significant public interest in the welfare of racing greyhounds. Further to the above question on the licensing of owners, keepers, or trainers of racing dogs, we seek evidence to justify or negate consideration of a phased ban in future. Please tick the box which most appropriately reflects your opinion on whether a phased ban should be given consideration.
6. We would value your view on the effects that any of these proposed changes would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

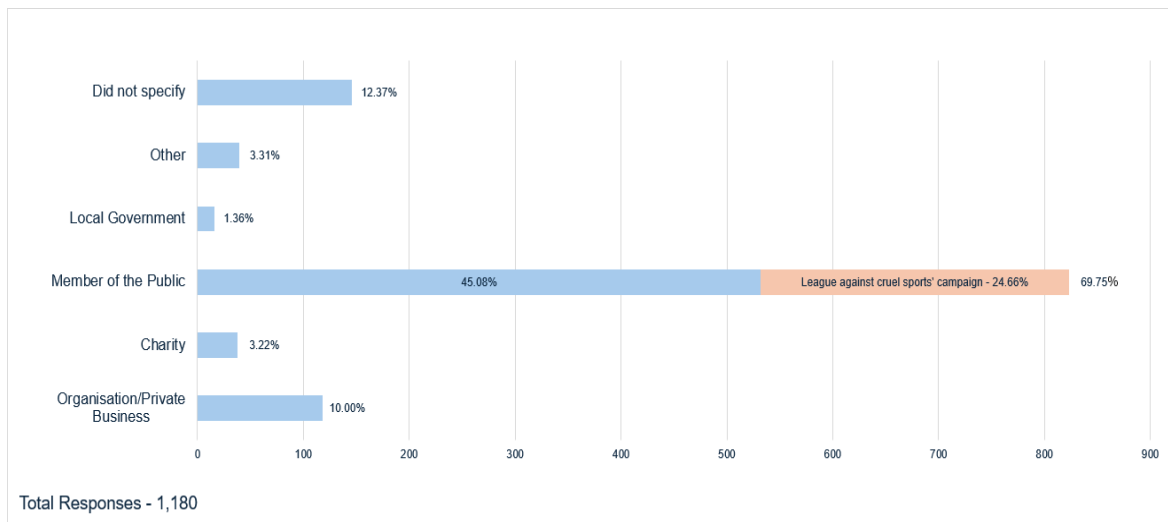


7. Please also explain how you believe any of these changes could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.
8. We have outlined the issues we are considering with regard to licensing animal establishments, activities and exhibits and considering future regulation of dog racing and have asked you to give specific answers to our questions above. If you have any further comments you would like to make on these issues, please enter in the text box below.

## 2. Responses to the Consultation

There were 1180 responses to the consultation. This included 344 via email and 836 via the online response form. Of the 1180 total responses, 291 were identical email responses received from the public as part of a campaign by the League Against Cruel Sports and concentrated on greyhounds.

Responses were received from a variety of contributors as follows\*:



\*for the purposes of the graph, the response received directly from League Against Cruel Sports has been included under 'charity' and not with the campaign responses.

Not all respondents answered every question. Some respondents did not directly answer some of the questions. Where this was the case, and for the purpose of this analysis, the responses have been allocated to the questions where they best fit. In addition, where respondents did answer the specific questions, parts of those answers may have been reallocated to another question where they best fit. Under each question we have provided representative examples of the responses we received.

We acknowledge that a small handful of respondents queried wording of the request for evidence incorporated as a second step in several questions. Namely, "*If yes to question X, please provide reasoning in the box below.*" This sought to encourage

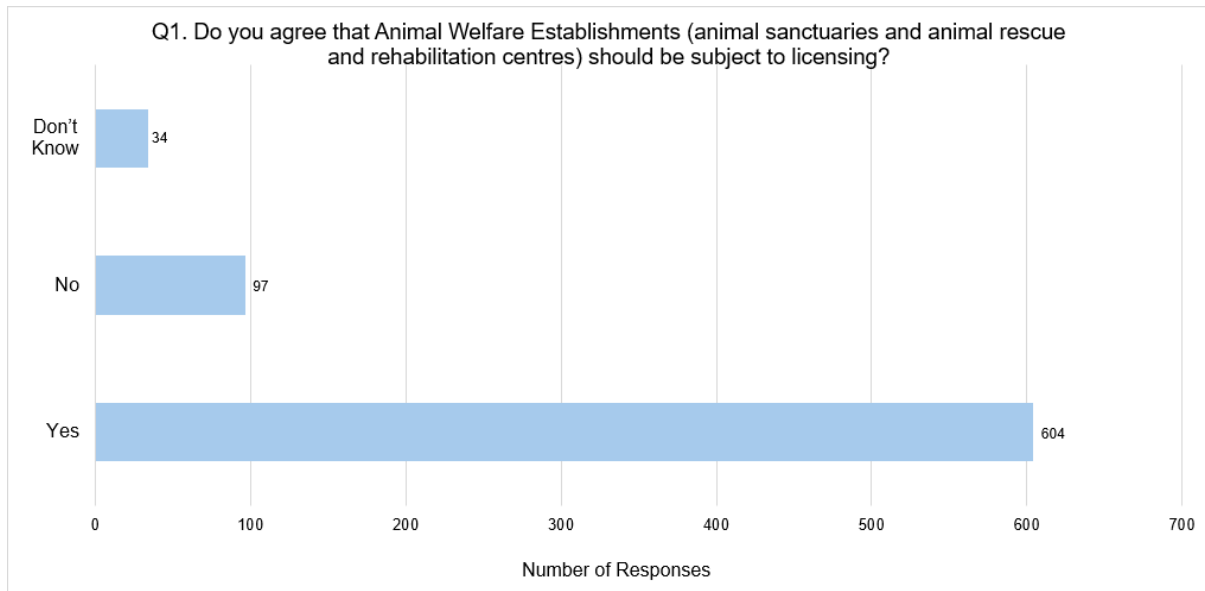
respondents seeking regulatory change to justify this course of action with reasoning and evidence, recognising such potentially significant and wide-ranging interventions might not otherwise be introduced. The free text box did however appear for all respondents, whether “yes” “no” or otherwise, and individuals were not dissuaded from adding detail. The consultation also included a dedicated free-text opportunity at Question 8, ensuring participants had opportunity to raise any further views, contribute to previous questions or identify areas and issues not elsewhere raised. Respondents were also at liberty to submit views via email or post, providing further freedom of format.

The organisations which responded are listed at Annex A. Some respondents asked that their personal details not be published, and this has been respected.

## **Question 1**

Question 1 asked respondents to consider whether Animal Welfare Establishments (AWEs) should be subject to licensing and asked those respondents in favour of further regulation to give reasoning to support this course of action.

There were 735 responses to this question with responses shown as follows:



82.18% of respondents agreed that AWEs should be subject to licensing.

### **Overarching Arguments Put Forward for Licensing**

Respondents were in strong agreement that licensing could ensure:

- appropriate checks before being granted a licence,
- periodic inspections by Local Authorities,
- suitable experience and/or qualifications to deliver the services offered,
- they operate to defined statutory standards,
- accountability when licence conditions are breached or animal welfare is compromised,
- visibility and transparency to reassure the public that persons offering a particular service are properly licensed.

Furthermore, given the volume of animals known to be held in AWEs across Wales, licensing could have widespread and significant positive impact.

“The PDSA Animal Wellbeing (PAW) Report 2024 (the largest nationally representative survey of dog, cat, and rabbit owners in the UK) shows that 27% of cats and 15% of dogs in Wales came from rescue centres, highlighting how important adequate standards of animal welfare in AWEs are for hundreds of thousands of pets in Wales. The 2024 PAW Report estimated that there are currently around 700,000 dogs and 700,000 pet cats in Wales,

which equates to approximately 170,000 cats and 77,000 dogs acquired from rescue centres” (Companion Animal Welfare Group Wales (CAWGW))

Most respondents expressed common concerns around welfare conditions, management, transparency and training needs.

- “While there may be good intentions to provide for the welfare of animals, it is possible that some premises and individuals take on numbers and types of animals they cannot adequately look after. This can create situations of poor welfare which is the opposite of what may have been intended. Licensing of sanctuaries, rescue and rehabilitation centres would give a base line standard to assure that welfare is being protected.” (Anonymous)
- “Within the current system, there are no safeguards to prevent those who lack the adequate knowledge, resources and experience from operating an animal welfare establishment. Because of this and the somewhat hidden nature of AWEs, it is difficult to identify where problems are occurring until it becomes too late.” (Animal Welfare Network Wales (AWNW))
- “Rescuing and rehabilitating animals and providing them with a high standard of species-specific care is a time-consuming and complex operation. Many individuals with good intentions set up AWEs, but without precise policies and procedures, some organisations lack the necessary resources or knowledge, in terms of finance, facilities, staff and veterinary expertise, to manage the continuous intake of animals. This often results in compromised welfare and health. For example, overcrowding of animals can lead to inter-animal related stress and health problems such as skin disease.” (Companion Animal Welfare Group Wales (CAWGW))

It was acknowledged that whilst most AWEs provide much needed services, serious animal welfare failings can and do arise.

- “While AWEs undertake hugely important work, the RSPCA has been required to prosecute four establishments in Wales in the last five years where serious failings in animal welfare have arisen.” (RSPCA)

Further, the current Code of Practice is insufficient:

- “[...] The Code of Best Practice for Animal Welfare Establishments, published in September 2020, was a positive step but its effect was weakened by it being voluntary. We believe that statutory licensing will be a significant step forward in terms of providing legal protection and safeguards for animals, ensuring enhanced welfare standards and promoting best practice in the sector.” (Blue Cross)

### **Concerns addressed by licensing**

Respondents indicated licensing AWEs could help to address the following welfare concerns:

## **Neglect**

Many establishments are well meaning but pressures often lead to neglect and ill treatment. Without regulation, it is difficult to identify problems until it is too late.

- “Often with no knowledge of their existence from an animal welfare protection perspective, until something goes wrong, animals are vulnerable and will suffer until it comes to the attention of enforcement bodies. This may not necessarily be intentional or a deliberate act of cruelty but simply because circumstances have changed. The cost-of-living crisis, personal health changes, other legislative consequences are just a few examples of what may impact. Stronger controls will only ensure that appropriate support, advice or where necessary enforcement action can be provided in a timely manner.” (Monmouthshire Trading Standards)
- “Although Animal Welfare Establishments (AWEs) normally have good intentions, the ethics and quality of care given varies widely, as does the knowledge and capability of the people running them or working/volunteering. AWE’s with a poor infrastructure, however well-meaning, can become overburdened, be poorly managed or simply fail to provide adequate care, all of which can result in compromised welfare.” (Companion Animal Sector Council (CASC))

## **Inappropriate premises or housing conditions**

Without strict policies and procedures in place, establishments can find themselves overwhelmed and with insufficient resource and facilities to cope with the animals being surrendered. Decisions can very often be emotional rather than logical.

- “At the moment anyone can set up an animal welfare establishment, without the necessary experience, infrastructure or funds, and social media provides a tool [to] do so with ease and little to no scrutiny. Many rescue organisations start as “kitchen-table” rescues from home and this allows them to operate under the radar with a risk of over-committing or not providing a suitable environment for their rescued animals.” (Hope Rescue)
- “While many individuals with good intentions may wish to establish AWEs, in the absence of rigorous policies and procedures, organisations may face overwhelming challenges and lack the necessary resources, in terms of finance, facilities, staff and veterinary expertise, to manage the continuous and unpredictable intake of animals. There are sadly reported cases of individuals operating rescue centres, who, although well meaning, do not necessarily have the appropriate space to accommodate the animals in their care. Animals in these cases can suffer from inter-animal related health and stress problems.” (Battersea)

## **Lack of suitably trained staff to cater for animals’ needs**

The lack of knowledge, training and behavioural expertise can seriously affect the welfare of an animal resulting in health issues and socialisation and behavioural

problems. In the absence of appropriate knowledge, animals are often not best matched to new owners, resulting in them needing to be returned, rehomed elsewhere, or abandoned.

- “There should also be at least one permanent person on the staff with relevant qualifications or working towards relevant qualifications in relation to the species they are working with to ensure appropriate environment setups, socialisation, enrichment and interactions. The standard of care falls short in many AWEs, where individuals who have the animal’s best interest at heart have no or inappropriate/ outdated knowledge of the species innate behaviours nor their social, emotional, physical and mental needs.” (Anonymous)
- “Pets that end up in rescue centres are often the most vulnerable and can have complex behavioural issues which requires staff looking after them to have a level of training which can be crucial to understanding that individual pet’s needs and identifying the sort of family that a pet can safely be rehomed to. Whilst they remain unregulated, animal establishments can avoid any sort of training or work in this area which can have disastrous consequences for human and animal welfare if it goes wrong.” (Anonymous)

## **Disease**

Some animals that are imported, legally or illegally, for rehoming pose a risk of introducing and spreading diseases not generally found in animals in the UK. Not only does this compromise the welfare of the animal being imported, but it also poses health risks to the wider UK animal population as well as public health.

- “Rehoming pets from abroad raises several concerns, from the potential health and welfare risks for the pets being imported, to health risks to the Welsh pet population as well as wider public health risks. As the international rehoming sector is completely unregulated in Wales, there is no regulatory framework, or legal responsibility, for rehoming organisations involved to support new pet owners or provide any assessment of their behavioural needs.” (Cats Protection)
- “During the pandemic in 2020, the UK saw a 50% increase in dogs imported from abroad, with imports from Romania increasing by nearly 70%<sup>1</sup> due to the public’s increased demand for dogs. [...] The British Veterinary Association’s Voice of the Veterinary Profession survey found in 2018 that 40% of companion animal vets have seen new or rare conditions in their practice [that year] associated with the import of overseas dogs...” (Dogs Trust)

## **Breeding for profit**

Currently, there is nothing stopping unscrupulous individuals operating as third-party sellers under the guise of an Animal Welfare Establishment. This kind of activity encourages breeders to supply these establishments and receive remuneration.

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<sup>1</sup> <https://www.vetvoices.co.uk/post/brucella-and-babesiosis-and-rabies-oh-my>

- “Because animal rescues are not required to be registered charities or community interest companies (or even a legal entity of any kind) this has left the unregulated part of the sector wide open to opportunistic fraudsters. We know of several cases across the UK whereby individuals have posed as ‘rescues’, when in fact they are buying large numbers of puppies and ‘rehoming’ them at a profit, all while appealing to the public for donations to their cause.” (Greyhound Rescue Wales)
- “The current lack of regulation for animal welfare establishments also creates loopholes within other pieces of legislation, for example the ban on third party sales included a rescue exemption which could be exploited by those unscrupulous sellers wishing to continue trading under the guise of rescue.” (Hope Rescue)
- “We appreciate that most sanctuaries are providing an essential service for the most neglected and abused animals. However, a rescue facility must meet certain criteria, and be subject to regular (and unannounced) inspections, in order to safeguard animals from neglect (whether intentional or due to insufficient knowledge), cruelty or mistreatment.” (Animal Aid)

### **Strong Case for Licensing**

These overarching themes were raised consistently by respondents across the organisational, public and wider spectrum, making a strong case for prioritising regulation in this area:

- **Financial Gain** - “There are too many so called ‘rescue’ centres where the animals are not cared for properly, and the aim is just to gather funds rather than help the animals. The animals welfare should be paramount, and the only way to ensure this is to regulate the charities, rescue centres accordingly.” (Camille Lambert)
- **Online Activity** - “[...] with the rise in popularity of social media platforms, rescue groups or individuals with no proper infrastructure can now promote themselves as rescue establishments with just a few clicks on a keyboard and begin to generate an income by asking for public donations via social media and crowdfunding. This type of online rescue establishment commonly leads to practical issues, with detrimental effects on animal health and welfare [...]” (Anonymous)
- **Management** - “The sheer volume of animals in need of shelter could easily tip even the most well-run rescue into an organisation where the welfare of animals is compromised. It is for this very reason that all Animal Welfare Establishments should be subject to independent mandatory licencing and inspection” (Forever Hounds Trust)
- **Accountability** - “Is likely to promote responsible care, protection, and well-being of animals, while also ensuring public trust and accountability in the sector” (The Greyhound Ambassadors)
- **Scrutiny** - “If a licensing regime is introduced, there will be knowledge of their existence and they will be subject to regular interventions. It will also allow

appropriate support to be provided, advice to be given and where necessary, enforcement action to be taken in a timely manner to protect the welfare of the animals” (Torfaen County Borough Council)

- **Training** - “Those that care for animals within such establishments should be able to demonstrate that they possess the relevant knowledge, competence and skills to do so and have undergone suitable training, including a need to keep up with best practice” (Stephen Wickens)
- **Current Loophole** - “Licensing these establishments would provide a framework to ensure that establishments provide acceptable standards of welfare and management, but would also serve to gather vital data about the sector which is lacking. It would also prevent businesses using a loophole to operate as a pet seller whilst avoiding the need to be licenced as such and allow the public to make more informed decisions about the quality of operators” (CASC)
- **Scale of the issue** - “We are firmly of the opinion that regulation of animal establishments is required in Wales. The scale and nature of the risk is such that allowing the sector to continue unregulated is simply not a viable option” (Greyhound Rescue Wales)

In addition to welfare issues, other factors raised included:

- **Proportionality** - “Additional bureaucracy i.e. licensing has to go hand in with proper inspection protocols - and enforcement. There are already significant layers of animal protection legislation that is simply not being enforced - due to lack of inspectors, funds.” (Rachel Barber)
- **Enforcement** - “Consideration should be given to the establishment of a centralised licensing database and inspectorate to ensure further burden is not put on local licensing authorities and to ensure greater consistency in implementation.” (Born Free Foundation)
- **Inspection** - “It is essential that the Welsh Government provides the necessary resources, financial and human, so the national model can achieve its aims and bring increased professionalisation to the sector. We strongly believe that anyone inspecting animal establishments should be appropriately knowledgeable and qualified in relevant animal welfare subjects.” (Blue Cross)
- **Unintended Consequence** - “We would also urge the Welsh Government to consider the potential unintended consequences of AWE regulation, such as more animals in need of rescue if some establishments are unable to meet the requirements and therefore face closure.” (RSPCA)
- **Business Support** - “It is important that with any new regulations, support is provided to enable those existing organisations to be brought into compliance. From an enforcement and licensing perspective this can be done within an agreed timeline and with appropriate advice. It is likely though that wider business support resource is required especially where such establishments are not for profit organisations. There is an inevitable risk that there could be an increase in abandoned animals or animals requiring rehoming so any



support to prevent establishments closing would help to mitigate this.” (Neath Port Talbot County Borough Council)

## **Cost Burden**

A number of “yes” respondents also raised the potential cost burden of licensing as an important consideration:

- “implementation of these regulations will come with a cost therefore we recommend that the price of the licence should cover the cost of enforcement. However, given that the vast majority of AWEs are run by charities and are regarded as being for the wider public good (given wider society’s wish to protect animals from abuse and other forms of suffering), CAWGW would welcome the Welsh Government’s encouragement of Local Authorities to do all they can to ensure the reasonable cost of licensing for AWEs.” (CAWGW)
- “some form of accountability should be implemented for these establishments to ensure protection and compliance for animal welfare[...] [local authorities’] fee structure should not be onerous or discouraging.” (Lester Dagge)
- “These type of establishments should be licensed and checked, but there should not be a prohibitive cost to this as they already struggle to raise funds to help the animals.” (Anonymous)

## **“No” Response**

13.20% of respondents disagreed with the licensing of AWEs. The primary reason was concern for the impact of additional financial pressures on AWEs.

- “Animal rescue centres are already under a massive amount of financial pressure and many are struggling to keep afloat [...] the additional costs involved in doing so could push them over the edge. These organisations are vital in our community; what happens if they are not there? The animals suffer.” (Anonymous)
- “Licensing won’t work, it will add complexity and cost to local authorities that already don’t enforce the legalisation that is in place. it will add a financial burden on activities which are either marginally economic or based on goodwill. These activities do not generate sufficient funds for this burden.” (Anonymous)
- “Most genuine small scale rescues do more work, with zero profit. Due to this they would not be able to continue to work when paying or working around licensing.” (Jordan Fletcher)
- “Local authorities do not have suitably qualified people to inspect these activities, nor do they have the budgets.” (Dr Fox, OBE)
- “We are particularly concerned about these plans to expand the animal licensing scheme to potentially hundreds more businesses while the original AAL guidance for pet sales is still not fit for purpose. We believe amending and correcting the current AAL guidance should be the priority before more work is

given to local authority inspectors who are already busy.” (Ornamental Aquatic Trade Association)

- “The existence of licences does not guarantee immediate change in standards/behaviour. Establishments which seek to avoid meeting standards and regulation will continue to operate “underground.” The existence of statutory licences will not ensure 100% participation.” (CLA Cymru)

### **“Don’t Know” Response**

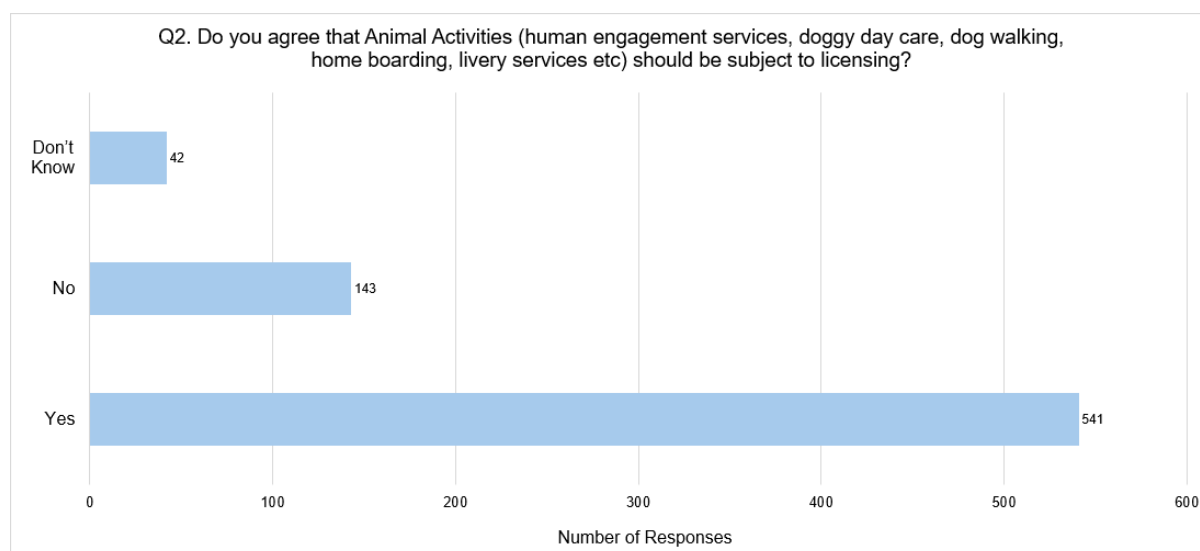
4.63% of respondents were unsure if AWEs should be licensed. As above, the primary reasoning was concern for added costs on AWEs.

- “In principle I think they should be subject to the checks that licensing can provide. However, as they are charitable organisations who do a lot of good for animals that have nowhere else to go, I would be concerned that satisfying licensing conditions might cause too much pressure on non-commercial organisations that are already struggling.” (Anonymous)
- “A registration scheme may be an appropriate alternative and lighter touch option if the evidence suggests a licensing scheme is disproportionate, this could be supported by codes of practice and conditions and could be reviewed at a later stage to assess the effectiveness of the scheme and any need to move to a stricter licensing regime. Any regulatory scheme which is costly or onerous could potentially force centres to close leaving more animals at risk and in the current financial climate Local Authorities cannot afford to subsidise the system.” (Anonymous)
- “Members were not opposed to a licensing scheme for such establishments to promote uniformity of care, however concerns were noted of the ability of these establishments to afford a licence. In essence it was questioned whether a licensing scheme would be the most effective method in achieving the intended outcomes, as the cost implications may deter the participation and therefore existence of smaller establishments.” (Farmers Union of Wales)

## **Question 2**

Question 2 asked respondents to consider whether animal activities should be subject to licensing and asked those respondents seeking further regulation to give reasoning to support this course of action.

There were 726 responses to this question with responses shown as follows:



74.52% of respondents agreed that animal activities should be subject to licensing.

### **Response Commentary**

It is acknowledged that the scope of question two was broad, reflecting the significant range of enterprises and activities ongoing in Wales, under the animal activities umbrella, identified as part of the prior call for evidence.

Some respondents referenced all in-scope activities within their response, whilst others gave activity-specific responses or suggested a more nuanced approach than blanket licensing everything raised. There was suggestion for instance that certain activities might benefit from a lighter touch approach such as registration.

As set out in the consultation, with the broad nature of activities identified, we envisage a phased, prioritised approach based on the evidence and feedback received.

Taken in their majority, “yes” respondents gave an overarching sense that animal activities would benefit from intervention at some level (licensing or otherwise) to improve animal welfare outcomes.

- “It’s imperative that the needs of all sentient beings are met by those looking after them, and their levels of competency and compliance can only be achieved and maintained through mandatory licensing of these activities.” (Forever Hounds Trust)

- “Any activity that involves animals being used as part of a commercial enterprise must be subject to proper licensing to ensure minimum welfare standards and prevent unnecessary suffering.” (Kim Singer)
- “Any person that proports to work or train any animal should be able to provide both owner and animal with the knowledge and understanding required to deliver standards of care in line with that animals requirements and also to maintain public safety.” (Jacqui Law)
- “You cannot ensure animal welfare is being adhered to if there are no rules in place.” (Anonymous)
- “[...] mae'n achos pryder bod unrhyw un yn gallu agor busnes fel darparu gofal dydd i gŵn, cerdded cŵn, hurio stablau ac ati heb drwydded. Diau fod y rhan fwyaf o bobl sy'n cynnal busnesau o'r fath yn gofalu am yr anifeiliaid yn dda, ond byddai cyflwyno system drwyddedu yn gallu pennu gofynion sylfaenol a sicrhau bod pobl yn cydymffurfio â nhw [...]” (Anonymous)

### **Scale of Animal Activities in Wales**

As part of their response to the consultation, in January 2024, the RSPCA undertook online research via social media and search engines to determine an up-to-date indication of how many ‘animal activities’ were operating in Wales:

- “We found almost 1,850 establishments and service providers covered by question 2 of this consultation - the majority of which are currently subject to no regulation or requirements for minimum standards. While this figure provides an estimate as to how many settings and providers could fall under a future licensing scheme, as it does not cover unadvertised activities or activities that are advertised elsewhere, they cannot be used as definitives but instead offer an insight into the wide-reaching scale of various animal activities in Wales.” (RSPCA)

### **Public Expectation**

The dependence of the animal-owning public on these often specialist services and their central role in responsible pet ownership means accountability, transparency and the fulfilment of expectations is crucial.

Several respondents raised this issue and highlighted the current gap between expectation (that animal activities are regulated) and reality (most animal activities are unregulated).

- “When entrusting these services with their companion animals, it is possible that owners assume, or are misled to believe, that they are already subject to some form of regulation. But the challenges owners currently face in choosing somebody else to care for their pet temporarily are likely to be compounded because of the ‘hidden’ nature of these activities. They are typically carried out in the absence of the owner and so gaining a full understanding of how they operate and the measures in place to protect welfare is difficult.” (RSPCA)

- “Professional and paid-for dog walking, pet grooming, sitting and boarding and livery services are all services that owners entrust their animals to, most likely under the guise or the assumption that they are subject to some form of regulation already.” (AWNW)
- “At present “anyone” can set up as a dog walker, house sitter or any other form of animal husbandry, with no previous knowledge or qualification whatsoever. This presents difficulties for potential clients as there is no common minimum standard or qualification for these roles, so it is difficult for them to choose wisely and safeguard their animals.” (Forever Hounds Trust)

Public reassurance, confidence, accountability and transparency were consistently raised as benefits of regulation.

- “Licensing will ensure that all people involved in these activities are reliable and responsible and on a register that the general public can then trust.” (Anonymous)
- “Requiring licensing leads to better care for the animals and more peace of mind for people using these services.” (Anonymous)

### **Overarching Arguments Put Forward for Licensing**

Broadly, there was strong agreement that licensing could ensure:

- suitable experience and/or qualifications to deliver the services offered,
- appropriate checks before being granted a licence,
- periodic inspections by Local Authorities,
- operation to defined statutory standards,
- accountability when licence conditions are breached or animal welfare is compromised,
- visibility and transparency to reassure the public that persons offering a particular service are properly licensed.
- animal, practitioner and public safety

Common general concerns raised related to welfare issues, public safety and assurance, prioritisation of profit, management, training, and compliance. (Enforcement and cost considerations were also a significant theme, given a dedicated section later in this summary.)

- “There is the potential without an effective licensing regime for untrained, uncommitted or exploitative people to set up operations that may prejudice the welfare of animals for which services are purportedly provided. Licensing should help to enhance both the trustworthiness but also the credibility of such activities as long as standards are rigorous and properly monitored and enforced, with clear and effective guidance for local authority or other officials tasked with licensing...” (David Grimsell)

- “Any activity where there is potential economic gain, directly or indirectly, must be incorporated within licensing regulations as financial considerations are often held in a fine balance with animal welfare...” (Helen Whitelegg, Redwings)
- “When carried out appropriately and safely, these services have the potential to improve pets’ quality of life. However, if they are not carried out as such they can be detrimental to physical health, behaviour, welfare and quality of life as well as posing serious safety risks to those animals, other people, other animals and the environment.” (AWNW)
- “[...] licensing would enable an oversight into the facilities and practices of an establishment and identify where improvements need making.” (Susan Lewis)
- “Animal health and welfare must clearly be at the heart of these provisions but many animal related activities also have the potential to have a significant impact on public safety.” (Swansea Council)

Several respondents also emphasised the need to close a loophole which effectively allows individuals offering several activities/services to avoid licensing under current home boarding legislation (as covered in the consultation):

- “Under the Animal Boarding Establishments Act, a person is not deemed to keep a boarding establishment “*if the provision of such accommodation is not the main activity*”. This presents an immediate loophole whereby boarding establishments which provide other services such as grooming or residential dog training, can declare themselves to primarily be a grooming or training business and thereby not need to apply for a boarder’s licence.” (Dogs Trust)

### **Caveated or Issue Specific “Yes” Response**

A significant number of “yes” respondents fell into this category. A proportion focused their response on certain or species-specific activities only:

- “License should stop dog walkers taking too many dogs out.” (Anonymous)
- “All of the above but in particular livery services should be licensed. There should be training for people running livery yards.” (Anonymous)

A number suggested there needed to be a sliding judgement:

- “Yes and no, all depends on what scale the person or establishment is undertaking.” (Paul Jarrett)
- “Yes, but.... there should be a distinction between large profitable businesses/charities and small independent operations that make little or no profit. Someone who helps out with a bit of dog walking should not have to undergo the same extensive licensing as a livery yard with 20 or more horses.” (Anonymous)

Most commonly, respondents caveated that licensing should only apply to certain activities. These generally fell into two categories, those that did not want a certain activity licensed and to a lesser extent, those that did not want a specific activity licensed because they favoured its prohibition. Representative examples are included below:

#### **“Yes” – Certain Activities Remain Unlicensed**

- “I believe home boarding and doggy day care should absolutely be licensed activities - how can you ensure appropriate housing, care and attention if not regulated and held accountable to someone? [...] I do not agree livery services should be regulated. Horses need to be kept somewhere, they can't live in the house. By imposing regulations on all yards would mean a drastic reduction of possible places to keep horses.” (Anonymous)
- “Where such animals are part of a registered organisation licensing should get waved provided the animal is registered, assessed and insured through that organisation.” (Anonymous)

#### **“Yes” – License Some Activities and Prohibit Others**

- “There are considerable health and welfare concerns associated with [puppy yoga and cat cafes] ... Blue Cross would prefer the Welsh Government take steps to ban [them] altogether. We do not want the imprimatur of a license to somehow normalise these activities or lead to an expansion of their presence in Wales.” (Blue Cross)
- “Primates as pets should be banned – a review of acceptable domesticated species should be created.” (Carolyn Thomas MS)
- “We [...] oppose animal activities such as alpaca llama trekking, puppy yoga and pony painting parties and call for all entertainment to be animal-free.” (Animal Aid)

### **Activity Specific Considerations**

The main activities commented upon were:

#### **Pet Grooming Services**

A high proportion of respondents agreed that pet grooming services should be licensed, with many singling out this activity as a priority in their submission.

The RSPCA estimate that at least 525 pet grooming enterprises are in operation in Wales, making it one of the most common activities captured in this consultation.

For many animals, grooming is essential to maintaining their health and welfare and demand for this specialised service is high. As set out by the Blue Cross, grooming is also “[...] an activity that requires expert knowledge and a high level of skill”.

Animals requiring grooming are also likely to frequent these services more than other animal care providers.

In their 2024 PAW Report, the PDSA found that 36% of Wales' dog owners had used a dog groomer. For cats, the PDSA cite their 2023 PAW Report which concluded 5% of owners had used a groomer, the equivalent of 30,000 cats.

- “[...] these represent significant numbers of pets who we owe it to, to ensure they are being cared for in suitable ways by those providing pet services.” (Emma Tipton, PDSA)

A petition titled, *‘Introduce regulation of the dog grooming sector, to protect the welfare of dogs and rights of owners,’* was submitted as evidence to the consultation by the former Chair of the Senedd Petitions Committee, Jack Sargeant MS, on behalf of the petitioner. On its closure 7 January 2024, the petition received 284 signatures and summarised concerns as follows:

**1. Animal Welfare:** It is imperative to prioritize the well-being and humane treatment of dogs. Regulation will promote responsible ownership, minimise stress levels, and reduce potential harm/injury caused by unqualified/negligent groomers.

**2. Training/Certification:** Unregulated dog grooming has led to untrained individuals operating without the necessary knowledge of breed-specific needs, hygiene practices, handling, or grooming procedures. A minimum standard of Animal First Aid should be a pre-requisite component.

**3. Health and Safety:** Minimum health and safety guidelines to maintain a safe environment. Correct sanitation, grooming equipment maintenance and compliance with hygiene protocols, crucial in preventing the spread of infections/parasites/diseases.

**4. Licensing/Inspection:** Training/insurance verification and compliance with health and safety regulations.

**5. Setting standards:** Regulation offers owners an assurance of standards by identifying qualified practitioners.”

Naturewatch Foundation echoed these concerns and further set out failings that have arisen on occasion:

- “There have been instances where animals have been harmed during grooming after being cut with equipment, overheated or restrained improperly. In some rare cases, animals have even died [...]” (Naturewatch Foundation)

The incorrect use of drying boxes was a particular area of concern for some, with one respondent suggesting:

- “[...] Drying boxes should not be permitted. There have been multiple cases of injury and deaths in dogs put in these boxes.” (Kirsty Jenkins, OneKind).



Concerns were shared across the organisational, public and professional spectrum, making a strong case for the licensing of pet grooming:

- “[The dog grooming sector has] the largest volume of interactions between an animal and a business. A dog usually visits a grooming business more often than a vet, for there to be no 'checks or balances' of this sector clearly undermines the welfare of dogs and the rights of dog owners. There are massive knowledge gaps in both the understanding of owners and groomers. Anyone can operate as a dog groomer in the UK with no grooming training, insurance, first aid accreditation and health and safety standards.” (Brian Howell)
- “Given the significant number of animals attending groomers and the substantial contact groomers have with dogs and cats, often in situations causing anxiety and using equipment with the potential to cause harm, it is crucial to ensure groomers possess a comprehensive understanding of animal behaviour and welfare and how to use the equipment that is the tools of their trade. This not only mitigates risks to groomers themselves but also enhances overall animal welfare. The introduction of licensing would elevate standards in the sector, preventing injuries and fatalities resulting from visits to irresponsible groomers.” (Battersea Dogs and Cats Home)
- “[...] Due to the nature of the activities carried out, there is undoubtedly potential for dogs to come to harm if procedures are carried out without the necessary training or care, and in unsafe spaces without a good standard of hygiene or using unsafe or poorly maintained equipment. If done incorrectly, activities such as nail clipping, emptying anal glands, or clipping matted fur can affect welfare and require veterinary treatment. Groomers should be clear what procedures are required to be carried out in compliance with the Veterinary Surgeons’ Act (VSA) 1966 such as dentals and be sufficiently trained in any other services they provide...” (BVA and BSAVA)
- “Dog Grooming should be licensed by extending the LAIA regulations, as this activity has the potential to seriously and negatively impact dog welfare.” (Dogs Trust)

Calls for licensing were not isolated to dogs alone, and several respondents highlighted the need for proposals to likewise apply to other species needing grooming, such as cats.

### **Arguments Against**

No respondents specifically objected to the licensing of this activity or offered an alternative model to licensing reform.

### **Animal Behaviourists and Trainers**

Several respondents highlighted Animal Behaviourists and Trainers as needing licensing in their responses to question two.

Concerns particularly focused around these specialised services being offered without background knowledge or qualification, and the potential for techniques used to negatively impact an animal's welfare and behaviour.

Concerns raised included:

- **Long-term Negative Impacts** – “[...] we regularly see the impact of the lack of regulation within the industry. We often care for dogs who have been subjected to unethical, or even harmful training methods, which have been proven to lead to negative emotional states, increased anxiety and increased aggression. These dogs often require long term rehabilitation due to the physical or psychological harm caused. In many cases the owners had been responsible in seeking help for their dog, but without regulation it can be a minefield for them to find and choose a suitable trainer.” (Hope Rescue)
- **Misled Public** – “We believe that the lack of existing regulations in this field exposes dog owners to significant risk that the trainer or behaviourist they choose may not have the appropriate knowledge and qualifications to adequately train their dog or address behavioural matters. Beyond the financial loss of paying for advice that is of no use, the additional risk is that existing behaviours may get worse, or other unwanted behaviours may be introduced. This could potentially result in a dog attack or the owner relinquishing the dog to rescue or unnecessary euthanasia.” (The Kennel Club)
- **Inexperienced Individuals** – “The animal behaviour and dog training industry is unregulated in Wales meaning anyone with no experience or qualifications can set up as an expert dog trainer or behaviourist. This regulatory gap has been exploited by unscrupulous and inexperienced dog trainers who increasingly purvey bad, even dangerous, advice on social media; for instance, advocating quick fix solutions and punishment-based training which dogs can find stressful and unpleasant.” (Blue Cross)
- **Variability** – “At present, there is an abundance of education provision in the world of animal training and behaviour yet, very little is independently verified as satisfying a common standard, having up-to-date and accurate content or being delivered in line with best educational practice...” (RSPCA)

## Arguments Against

No respondents specifically objected to the licensing of this activity or offered an alternative model to licensing reform.

## Dog Walking

As acknowledged by many respondents, we have witnessed a significant rise in pet ownership in recent years. In response, many commercial dog walking services have been set up to meet owners' needs, from small independent offerings to online services and large franchises.

Some individuals sought clarification that in using the term 'dog walking,' it was not the intention to license the act of walking one's own dog. For the avoidance of doubt, within the context of this consultation 'dog walking' refers to commercial dog walking.

Although most respondents agreed regulation was necessary in this area, the collective view was that a full licensing regime could prove excessive, and many suggested a registration system may instead be more appropriate.

- "A statutory licensing scheme may prove excessively burdensome and disproportionate for dog walking, posing enforcement challenges for Local Authorities." (Battersea)
- "We would support guidance accompanied by a registration system in which [commercial dog walkers] are required to register with the Local Authority [...]" (The Kennel Club)

Further, although aware of genuine concerns in this area, several respondents felt an evidence base for licensing was lacking:

- "...we are not aware of many significant incidents taking place involving [commercial dog walkers], or any robust evidence of the scale of issues associated... In terms of welfare or dog control matters, there is already existing legislation that could be used to address issues that arise without specifically licensing [...]" (The Kennel Club)
- "While there have been some high-profile tragic events connected to dog walking, we question whether there is sufficient evidence of risk and harm to warrant the introduction of a licensing scheme." (Anonymous)

For a few respondents, dog attacks offered justification for regulation in this area:

"It is astonishing to me that anyone who wants to can take money off people to walk their dogs with no idea what they're doing, no guarantee of the safety of the dogs or the public, and no way of being regulated. With dog attacks on a significant increase in the last few years, dog walking needs to be better controlled." (Amy Harding)

Despite many favouring a lighter touch approach, some respondents expressly felt dog walking should be licensed:

- "If an individual is entrusting their animal to someone else, that service should be licensed to ensure an agreed standard of care is met. I think this is especially important for dog walking services, where they may end up putting everyone's dog at risk if something happens [...]" (Anonymous)
- "Dog walkers who are careless and irresponsible could potentially cause serious negative welfare impacts to the dogs in their care. Irresponsible dog walkers can also endanger public safety, cause concern for other dogs and dog walkers and have a deleterious impact on the environment. A statutory

licensing system should help to drive up and maintain standards across the dog walking sector, increase transparency and therefore lead to enhanced dog welfare.” (Blue Cross)

- “...services are popping up all over the place and are sometimes run by people looking to make quick money. Dog walkers are often oversubscribed and try to walk an uncontrollable amount of dogs at once.” (Anonymous)
- “Definitely need licensing for dog walking. So many use own cars, no safety or insurance. Walk multiples of dogs with no control.” (Anonymous)

### **Arguments Against**

Conversely, some respondents disagreed with the licensing of dog walkers, in particular where done on a small scale, or by a neighbour for example:

- “[...] rydym o’r farn nad oes tystiolaeth o’r angen i reoleiddio y gwasanaethau hyn drwy gyfundrefn drwyddedu; fe fyddai gwneud hynny yn anodd iawn i’w weithredu.” (Gwynedd County Council)  
“Overall yes with an exception of dog walking as this is often done by neighbours, etc.” (Kelly Boler)
- “For the most part yes but often people walking dogs for others occasionally being vetted should be down to the owner of the dog they walk, there are not enough people to police such a thing so concentration should be on larger for-profit establishments.” (Pamela Kathleen Hyett)
- “The proposals may have a negative impact on micro businesses within Wales, which offer services like dog walking or day care assistance whilst the owners are away at work. These services are often relied on, and the reality is if these stop it could pose further risk to animal welfare.” (Glynn Evans, BASC)

A very small percentage of respondents were unsure whether dog walking should be licensed.

- “[...] a statutory licensing regime may result in some dog walkers going out of business or increasing costs. As a result, owners may leave dogs for longer without exercise, or have to rely on unregulated informal mechanisms, including online platforms [...] based on members of the public walking one another’s dogs but not for payment.” (Dr Sarah Singh and Prof Marie Fox)
- “Not sure about this in the wider context e.g. dog walking [...]” (Anonymous)

### **Pet Sitters, Animal Boarding and Daycare Services**

With the number of pet owners on the rise in Wales, and factors such as a post-covid return to offices at play, more and more owners are reliant on pet sitting, boarding and daycare services to meet their pet’s needs or ensure care in their absence.

Respondents acknowledged these services often benefit pet owners, and that many well consider health and welfare requirements. However, concerns were raised around welfare, facilities, management, resourcing, enforcement and loopholes.

Subsequently, most respondents were in favour of licensing with issues to be overcome including:

- **Behavioural and Disease Risk** – “[...] one of the main risks to welfare in these unregulated settings relates to the mixing of dogs” (RSPCA).  
Elaborating on these risks, the RSPCA point to risk of disease spread as well as anxiety and aggression between dogs.
- **Inexperienced Practitioners** – “...there are too many who set up [as] a 'hussle' ...Many no doubt love animals but simply have no clue and on a practical side no appropriate premises, no insurance, no real regard for the animal they look after or the owner.” (Anonymous)
- **Lack of consistency** – “Some of the day care and home boarding are undercutting boarding kennels and catteries which are subject to licencing. This seems unfair. As it is unregulated, there is a risk of people taking on too many pets or mixing their own pets with visiting pets. It is unclear whether people have appropriate experience and training to deal with the pets.” (Anonymous)
- **Widespread activity** – “We believe it is absolutely right to bring home boarders and daycares into the legislative regime. [...] can't be adequately licensed by the Boarding Establishments Act, as they weren't in existence in the 1960s. These activities are now widespread and those undertaking the activities must have a minimum level of welfare standardisation to help ensure that pets aren't harmed.” (Anonymous)

### **Outdated 1963 Act and Loophole**

Many respondents raised the 1963 Animal Boarding Establishments Act and loopholes in the current legislation as justification for licensing:

- “[...] before any new activities are brought into the licensing regime, we believe that the existing legislation for kennels and catteries should be updated. The current Boarding Establishments Act 1963 which covers commercial kennels and catteries is hugely outdated and legislation needs to be updated which better reflect pet boarding today, and which can then add additional activities such as dog daycare and home boarding.” (Anonymous)
- “It is important that existing legislation is strengthened to close the loopholes that currently allow certain activities to take place, avoiding the need to be licensed because it is not the main activity. It is also important to note that many of these activities take place at or from private residential addresses, which can restrict enforcement powers.” (Swansea County Council)

Some respondents suggested online platforms should also be regulated.

- “The Welsh Government could consider a registration system for operators working within a franchise model that do not pass a business test, such as those found on platforms like Rover or Borrow my Doggy [...] ensuring that welfare standards are explicitly communicated to all registered pet sitters.” (Battersea Dogs and Cats Home)

## Arguments Against

Arguments against licensing included costs, over-regulation and restricting voluntary support:

- “...this is pushing up the cost [subsequently] you have clients rehoming dogs as they cannot afford the day care...” (Jordan Fletcher)
- “Just stopping people from working bad enough now too many regulations, and not needed for doggy day care as owners...” (Sharon Ward)
- “[...] unintendedly preventing responsible individuals from providing support to other animal owners. The proposals may have a negative impact on micro businesses within Wales, which offer services like [...] day care assistance whilst the owners are away at work...” (BASC)

Though supportive of amending the 1963 Act, with regards regulating these services, The Kennel Club advise “[...] there needs to be a sensible and clear licensing threshold, such that a neighbour, relative or friend looking after someone’s pet dog while they go on holiday as a one-off is not required to obtain a boarding licence.”

With regards day care facilities for cats, Cats Protection do not condone this service on welfare grounds and subsequently cannot support licensing:

- “Cats Protection does not support cats being taken to day care facilities [...] Day care facilities require regular travel for cats which can be stressful. Cats are extremely territorial and placing them in an unfamiliar space or taking them to new and unfamiliar environments, is likely to cause them stress, fear and anxiety and will not provide them with any benefit. Although a cattery does also require travel this is not to the same frequency.” (Cats Protection)

## Cat/Dog Cafes

A very small number of respondents specifically raised cat/dog cafes in their responses. In all such cases, respondents did not favour licensing of these establishments but instead sought an outright ban.

- “Cat Protection believes that there are some activities which should be listed as incompatible with animal welfare, one increasingly popular example of this would be cat cafes.” (Cats Protection)
- “Battersea is concerned with the welfare implications of housing multiple cats in a confined space as is the case with cat cafes or kitten yoga. Domestic

cats are solitary animals by nature and generally do not thrive in social group settings...” (Battersea Cats and Dogs Home)

- “While a number of cat cafes remain open in England [...] there are seemingly few, if any, cat cafes currently operating in Wales. Research undertaken by RSPCA Cymru in January 2024 suggests that those that were previously open [...] have now closed.” (RSPCA)

## **Human-Animal Engagement Services and Pet Therapy**

Only a small number of respondents explicitly commented on these services in their response. Views on licencing human-animal engagement and pet therapy varied widely, with a marginal proportion of responses favouring licencing, including:

- “The human perception of ‘unconditional love’ from animals is often quoted as the rationale for successful human-animal engagements. However, the lines between animal welfare and anthropomorphism [...] are often blurred.” (Cariad Pet Therapy)
- “The key welfare concerns associated with human animal encounters include unfamiliar environments, inappropriate handling and a lack of standardised guidance [...]” “In some of the activities, animals will be frequently exposed to unfamiliar environments and are expected to remain calm with potentially challenging stimuli.” (RSPCA)
- “I have particular concerns about animals that are [...] visiting hospitals, care homes, etc where they are outside of their usual, natural environment and may be prodded, poked or otherwise subject to unwanted attention that may cause stress and provoke a fear response.” (Yvie Bennett)
- “Licensing of this activity [could help ensure providers] had procedures to protect the public. Organisations such as Pets As Therapy already operate a system of approval that could be used instead of licensing...” (AWNW)

Several respondents expressed caution or alternatives to licencing citing the benefits of pet therapy and those offering well managed experiences.

- “Therapy pets bring considerable benefits to people across Wales. Volunteers give up their time to improve the lives of others and it’s absolutely essential that any regulation of therapy pets is strictly proportionate. Introducing expensive or bureaucratic regulations will inevitably reduce the number of therapy pets providing this valuable service.” (The Kennel Club)
- “Pet therapy initiatives in the UK are generally not-for-profit, for example Pets as Therapy or Therapy Dogs Nationwide. Given that therapy animals live with their owners and as these are registered charities, a statutory licencing system seems onerous. The Welsh Government could consider a registration system coupled with a Code of Practice.” (Battersea)

- “We are also of the opinion that the protection of animals and respect towards them can be promoted through activities where children and adults come into contact with them, and that an element of ‘encounter’ is needed in order to ensure such occasions are meaningful. We therefore believe that any licensing regulations should be proportionate to the risk to the animal, and [...] do not inadvertently reduce the opportunities for people to come to appreciate animals.” (Churches Together in Wales)

One respondent felt that licensing was not an appropriate course of action and suggested only an outright ban on these services would protect animal welfare.

- “We frequently see examples of animals, both domestic and exotic, brought into a variety of settings to be used for supposed therapy. This has included wild animals such as penguins being brought into care homes in events that provide PR opportunities for the operators. We do not believe that animals should be transported or used for such activities, including ones deemed therapeutic to humans, as they contribute negatively to animal welfare. We therefore recommend that human-animal encounters (including pet therapy) be prohibited by law...” (Freedom for Animals)

### **Puppy/Kitten Yoga**

In all cases where it was raised, puppy and kitten yoga were highlighted as activities of concern requiring intervention. The consensus was in favour of a ban of these activities as opposed to licensing.

- Cats Protection “[...] are concerned about the welfare implications, such as risk of injury to the kittens, limited opportunity for the kittens to hide and rest and the possibility of disease developing among younger kittens.”
- “The increasing popularity of activities such as “puppy yoga” [...] was raised by the British Veterinary Association during the EFRA debate in 2023. This constitutes a welfare compromise, whereby no regard has been paid to the wellbeing of the pups or their ability to exhibit natural behaviours.” (Forever Hounds Trust)
- “Dwi hefyd yn credu y dylai pobl feddwl yn ofalus am les anifeiliaid cyn cynnal gweithgareddau fel therapi anifeiliaid anwes, ioga cŵn bach ac ati.” (Anonymous)
- “[...] with regard to puppy yoga classes, [do] not believe that these can be delivered without compromising the welfare of the puppies involved to an unacceptable level. We do not believe that these should be permitted, even within a regulated environment.” (The Kennel Club)
- “[...] puppy yoga and pony painting parties are likely to compromise welfare to an extent that could not be rectified by licensing, we would favour the banning of these activities as opposed to regulation.” (RSPCA)



- “We do not believe that licensing of puppy yoga providers would be sufficient to protect the dogs involved. [...] the Government should take steps to prohibit [it].” (Dogs Trust)

## Livery Yards

Several respondents raised livery yards as requiring scrutiny. Despite some disagreement on the means, the majority suggested licensing, or another form of regulation, such as registration, was needed.

Blue Cross support licensing and highlighted issues with unlicensed livery yards including:

- “[...] inadequate/ inappropriate housing/stabling/shelter, lax biosecurity measures leading to an increase in the risk of infectious diseases, such as equine influenza and strangles. [...] unsafe, inadequate and badly maintained fencing. [...] lack of suitable and well-maintained grazing and foraging opportunities; inexperienced and high turnover of staff [...]” (Blue Cross)

The British Horse Society mirrored this view:

- “[Licensing will] provide a much clearer picture of where equines are kept and [...] support a minimum standard [for facilities and care]. [...] The provision of livery, particularly DIY, is often seen as a low input, income generating business where the business owner may look to absolve themselves of any responsibility [...]” (The British Horse Society)

Strongly supporting regulation, the RSPCA commended the *British Horse Society’s Approved Livery Yard Scheme* as a “notable initiative” however “[it is voluntary] and the vast majority [...] are not yet members.”

Several other respondents shared similar views:

- “At present there is no reliable or singular reference points for the owners of equestrian establishments such as livery yards, with no singular guidance or support available for the industry [...] introduction of at minimum [...] registration [...]” (Anonymous)
- “[...] there should be checks that the yards are suitable for the services provided eg stables, turn out land and documentation of vaccinations and worming are up to date to avoid as much as practicable any spread of disease, this will also keep livestock in healthy condition.” (Anonymous)

A small number of respondents suggested that licensing should apply only on a case-by-case basis, dependent on the formality of service offered:

- “[...] places which offer full livery should be licensed, but [...] DIY livery/part-livery establishments shouldn't be subject to licensing (or only if they are over a certain size) as the owners of the horses should be visiting daily and responsible for the welfare of their own horse(s).” (Anonymous)

- “Livery yards may be varied in the services they offer to horse owners. Some businesses may provide a 24/7 service while others just the provision of a space. It may be difficult to set an appropriate threshold should licensing be considered.” (AWNW)

Most favoured registration or advised additional evidence gathering on the sector would be beneficial:

- “[...] partly because of the number and diversity of livery yards, [licensing] is a large and complex undertaking. Before commitment is made to a specific licensing model, far more information on the sector itself is needed. [...] A system of mandatory registration could be considered as a practical first step. This would gather more information on the nature and scale of the livery sector so that Welsh Government can develop an appropriate and proportionate approach to livery licensing.” (Redwings)
- “[...] while we support the intent of licensing of livery yards, we would propose that this should be a phased approach, and that registration of livery yards must come before statutory licensing [...].” (World Horse Welfare with support from British Horse Council)

A minority disagreed with licensing and did not advocate for an alternative form of regulation, stating how ultimate responsibility remains with the owner, or highlighting the potential challenge of inspecting and enforcing livery yards.

### **Riding Establishments**

A small handful of respondents explicitly mentioned riding establishments, with outdated legislation the main concern.

- “Blue Cross supports riding establishments being brought under the scope of the licensing framework as the 1964 Act is outdated... [for] greater oversight, transparency and accountability... [and] also bring Wales into line with England.” (Blue Cross)
- “[Existing legislation has] not benefitted from the advances of the intervening half a century and we would like to see [it revoked and] brought within the scope of the 2021 Animal Welfare (Licensing of Activities Involving Animals) (Wales) regulations.” (Redwings)
- “[...] The current Act does not reflect the latest scientific understanding of animal/equine welfare [...] Horses' emotional well-being and behavioural needs need to be addressed as part of fitness to work and be ridden; not just their physical health parameters considered.” (World Horse Welfare with support from British Horse Council)

Despite the above support for reform, others underlined the importance of a knowledgeable inspectorate to adequate enforcement:

- “Regulations and licenses are only as good as those that inspect/enforce them[...] (Riding School license) councils inspectors vary enormously in experience and knowledge of animals [...] Inspectors MUST have specific industry experience.” (Anonymous)

## Arguments Against

No respondents specifically objected to the licensing of this activity or offered an alternative model to licensing reform.

## Outlying Areas

A handful of respondents raised activities not elsewhere covered.

These were:

- **School Animals** – “[...] keeping animals in a school environment all day, every day, is not in their best interests. We urge that the Welsh Government considers whether this should be banned.” (One Kind)
- **Dog Pools** – “[...] currently 8 dog pools operating in Wales, ranging between recreational swimming pools for dogs to play in, to those offering vet-referred hydrotherapy services. All could present a risk to dog welfare without inspections and minimal standards.” (Dogs Trust)
- **Carriage Rides** - “[...] can have severely detrimental welfare consequences for the horses due to daily exposure to noise and pollution, heavy traffic, hard pavement, long workdays, constant heavy loads, lack of access to water and pasture, extreme weather leading to heat stroke, potential for injury and exhaustion.” (Blue Cross)
- **Play Parks** – “While all dog play parks must be safe and secure to protect the dogs using them, different play parks offer slightly different services so further research is most likely needed in this respect.” (RSPCA)
- **Equine Hire** – “[...] extending licensing to all situations where equines are hired out and a business test is met [...] is a realistic proposition. This should include pony parties, hunter hirelings, carriage rides and polo.” (World Horse Welfare with support from British Horse Council)
- **Llama/Alpaca Walks** – The RSCPA estimate 34 providers in Wales and support the introduction of a licensing scheme in this area.
- **Livestock Activities** – “[...] the FUW strongly advises that all exhibits relating to livestock (including but not exclusive of livestock shows, sheepdog trials and the like) should be excluded from the proposed licensing scheme due to the existing regulation governing livestock health and welfare.” (FUW)
- **Primates as Pets** – The RSPCA seek “[...] an outright ban on the sale, breeding and keeping of primates [...]” in a domestic environment, as “[...] incompatible with their wild nature and beyond the experience, knowledge and resources of the majority of the public.”

- **Fertility Services** – “[...] wider activities that need consideration for regulation include; controls around Stud Dogs and associated activities such as semen supply, and the fertility clinics used [...]” (Rebecca Athay, Shared Regulatory Services)

## “No” Respondents

19.70% of respondents provided a “no” response on the licensing of Animal Activities. However, upon review, a proportion of “no” respondents agreed with some form of licensing, but only for certain activities.

- “No to dog walking. Yes to all the others because they are providing a paid service to the public.” (Anonymous)
- “This would stop many informal and perfectly good helpers. Paid for services - probably yes.” (Jennie F)

Of the remaining “no” respondents, five main themes emerged. These were cost/regulatory burden, evidence lacking, sufficient existing legislation, owner decision making and potential unintended consequences.

A representative selection is included below:

- **Cost Burden** – “[...] costs will increase to cover the licence fee [...] This will put some of these services out of the reach of people who are just about managing...” (Anne Kasica)
- **Evidence Lacking** – “[...] No evidence has been presented that a problem exists which cannot be better managed by appropriate enforcement of standards / regulations.” (CLA Cymru)
- **Regulatory Burden** – “A lot if this work is done on a voluntary basis. Beurocracy and paperwork will mean a reduction in such services..” (Anonymous)
- **Sufficient Existing Legislation** – “There is already ample legislation covering animal welfare. You only need to implement the existing legislation.” (N Havemann- Mart)
- **Owner Decision Making** – “The responsibility should rest with owners to ensure acceptable standards of animal welfare are met.” (Lorraine Czaja)
- **Potential Unintended Consequences** – “[...] these proposals could in fact have a negative effect, unintendedly preventing responsible individuals from providing support to other animal owners.” (BASC)

## “Don’t Know” Respondents

5.79% of respondents provided a “don’t know” response. However, upon review, “don’t know” responses ranged in meaning.

For instance, a small proportion of “don’t know” respondents agreed with some form of licensing, but only for certain activities.

“I agree that home boarders, doggy daycare. I do not agree that liveries, dog walkers or engagement services do.” (Anonymous)

Some respondents raised the role of public education, cost burden, and over-reach from Government. Others were simply unsure or commented that this was a more complex area, and suggested a proportionate, parameters-based approach.

### **Commentary on Proportionality**

Proportionality was a key theme in both The Kennel Club (“no”) and the joint BVA and BSAVA (“don’t know”) response to question two, given respectively in “no” and “don’t know” categories on account of the broad scope of activities captured.

- “There is significant potential for wider harm in the example of an unqualified animal behaviourist providing poor advice. It doesn’t feel appropriate to group them in the same category as someone offering to provide some informal pet sitting for a friend in exchange for a bottle of wine or a token payment.” (The Kennel Club)
- “[...] what is appropriate for a large professional livery yard, could be wildly out of proportion for an individual operating a dog walking business from their home. Any licensing scheme must have the flexibility to recognise this.” (The BVA and BSAVA Joint Response)

Similarly, Countryside Alliance expressed significant concerns around proportionality and regulatory intentions.

- “The focus should be on those areas where there is clear evidence of a problem and we must not to lose sight of the purpose of any regulation which is to ensure animal welfare not simply regulate human activities because they involve human animal interaction.” (Rachel Evans, Countryside Alliance)

### **Overarching Themes: Enforcement, Question Scope and Costs**

Three specific areas were consistently raised by all, “yes”, “no” or otherwise.

#### **Enforcement**

- “[...] licensing is of limited value unless there are local authority resources sufficient to run and enforce such schemes.” (BVA and BSAVA)
- “Without adequate resourcing [...] may simply become a bureaucratic burden to responsible businesses, with limited ability to address the pockets of poor welfare they are designed to improve.” (Redwings)

- “With Local Authorities currently under huge pressure, such licensing would need a considerable investment to ensure its effectiveness over such a range of activities and across Wales.” (Anonymous)
- “[...] while the paperbased application process can be administered by individual local authorities, [suggest] inspections are all undertaken by the Animal Licencing in Wales Group so that inspectors have adequate level animal welfare expertise. (Dr Sarah Singh and Prof Marie Fox)

### **Broad Question Scope**

- “This proposal is excessively broad and encompasses far too many activities to provide a simple yes or no answer for [...] there is a lack of clarity [...] whether licensing should apply to anyone providing these services, or [be limited to businesses].” (The Kennel Club)
- “This is a very broad category. While we agree that many of these activities should be licensed, there will be differing considerations for each [...] certain activities that could fall into this broad category create an unacceptable risk to animal welfare and should be banned.” (One Kind)
- “There is a danger that the scope of the current proposals would require so many people to be licensed that the situation would become unmanageable.” (Rachel Evans, Countryside Alliance)

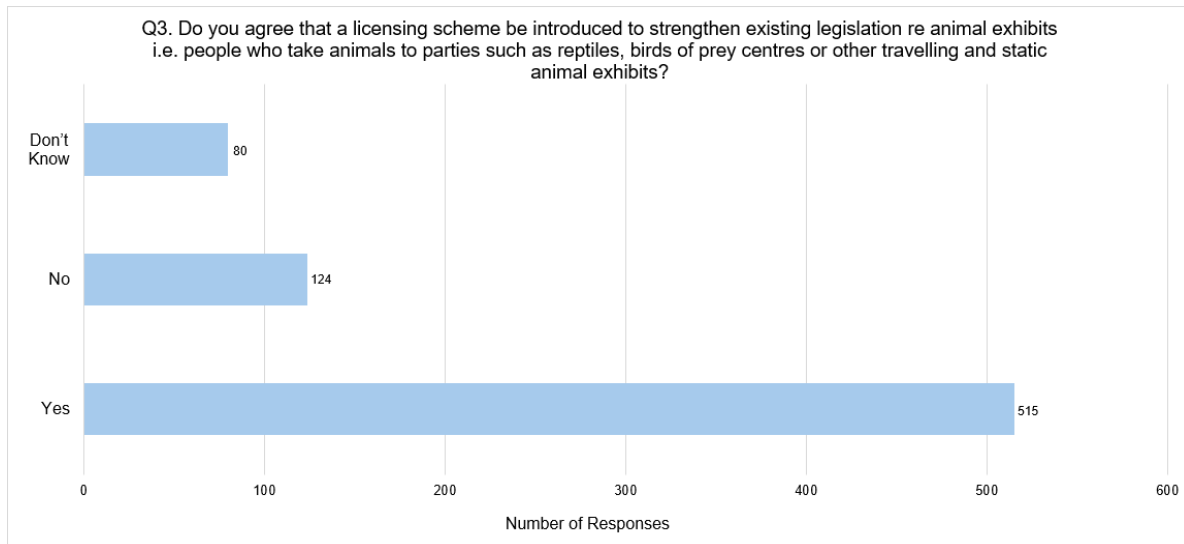
### **Costs**

- “Many of the activities covered by this consultation are likely to be small businesses with minimal profit margins, therefore a future scheme that makes licensing a straightforward and affordable option for such providers could assist with compliance and protect animal welfare as intended.” (RSPCA)
- “Many of these functions are important for animal welfare, so we encourage the legislators to ensure... [licensing] is not prohibitively expensive or invasive for the operators.” (Freedom for Animals)

### **Question 3**

Question 3 asked respondents whether a licensing scheme should be introduced to strengthen existing legislation regarding animal exhibits. Respondents in favour of regulatory change were asked to give reasoning to support this course of action.

There were 719 responses to this question with responses shown as follows:



71.63% agreed that a licensing scheme should be introduced in Wales to strengthen existing legislation regarding Animal Exhibits.

### **Figures Commentary**

Although there were 515 “yes” responses to this question, upon analysing the responses the picture becomes more nuanced. For example:

- A high proportion of respondents gave a “yes” response but strongly favoured a ban.
- A significant number of respondents gave a “yes” response but felt licensing should only apply to certain areas or focused their response on certain activities only.
- Over 88% of respondents provided a single word, sentence, or no reasoning.

### **Overarching Arguments Put Forward for Licensing**

Responses gave an overarching sense that animal exhibits would benefit from intervention (regulatory or otherwise) to improve animal welfare outcomes.

The RSPCA stated they had “[...] encountered some level of welfare problems in virtually all situations regarding exhibited animals.” They strongly support licensing proposals “[...] to provide better legal protection for animals who are exhibited.”

Concerns raised by the Blue Cross in relation to animal exhibits included the regular handling and transportation of animals causing them stress, risk of injury to children/public, and the potential to spread zoonotic diseases.

Similar concerns and support for licensing were raised by wide-ranging respondents with consistency, citing reasons from neglect and mismanagement to profiteering, disease risk and public trust:

- “Oversight of these activities is desirable for reasons of animal welfare; safety of the animals involved; disease and zoonoses control; and public health.” (The BVA and the BSAVA Joint Response)
- “These activities are examples of profiteering from animals overriding welfare considerations, and this unregulated area of animal management should be subject to licensing regulations.” (Forever Hounds Trust)
- “Introducing a licensing scheme to strengthen existing legislation for animal exhibits is likely to further promote responsible care, protection, and well-being of animals, while also ensuring public trust and accountability in the sector.” (The Greyhound Ambassadors)

### **Outdated Performing Animals (Regulation) Act 1925**

As was set out in the consultation document, the Performing Animals (Regulation) Act 1925 is currently the only form of regulation in this area. However, not all animal exhibits will be registered.

- Swansea Council raise issue that “Currently the Performing Animals legislation only requires a one-off registration, with limited regulatory controls.”
- Born Free also note “[...] no inspection or record keeping is required [...]” for the 1925 Act and as such, “[...] the stocklists for [...] Welsh operators may not accurately reflect the range or numbers of animals that operators are currently keeping.”

### **Cross-Border Consistency**

A couple of responses referenced the need to consider the cross-border nature of many animal exhibits:

- “[...] often such activities will operate across LA boundaries in Wales and England or even further afield, so consistency in requirements is key.” (Gareth Walters)
- Licensing animal exhibits “[...] would align regulation with similar regulations across the UK.” (CASC)



## Public Awareness

Several “yes” respondents expressed surprise that animal exhibits weren’t already subject to licensing in Wales.

- “The question should be why isn't this already in place?” (Roy Bish)
- “I'm honestly gob-smacked that this isn't already licensed. Exotic animals hanging around at parties, being used for entertainment with no regulations? Ridiculous.” (Amy Harding)

A number of responses suggested licensing would raise standards and encourage accountability, thereby providing the public with a level of reassurance.

- “Many activities involving or on behalf of animals require specialist knowledge or experience of the needs of those animals, or of the means of delivering these. There is also a strong expectation by the public that animal welfare laws and standards will be robustly enforced. Both can best be achieved by ensuring conditional and renewable licensing of undertakings, by which working methods and standards can be checked regularly.” (Mike Bird, RSPCA Aberconwy Branch)

## Caveated or Issue Specific “Yes” Response

A significant number of respondents gave a “yes” response but caveated that licensing should only apply to certain areas or focused their response on certain activities only.

- “The only welfare measure which would make any meaningful difference for reindeer’s welfare is to prohibit them from being used in events at all. i.e. licensing of reindeer events would be an ineffective use of time and resources and would not achieve welfare goals.” (Animal Aid)
- “Yes, but there should be caveats for animal rescues who may take animals out to fundraise. Any licensing should not penalise rescues and charities.” (Charlotte Copik Phillips)
- “Er fy mod i wedi ateb 'ydw' byddai angen rhoi ystyriaeth i'r gweithgarwch. Ond, ar y cyfan, dylai unrhyw weithgarwch sy'n defnyddio anifeiliaid, fod â thrwydded er mwyn sicrhau lles yr anifeiliaid dan sylw.” (Anonymous)
- “It should be illegal to take animals to parties or have travelling exhibits because those activities place tremendous stress on the animals. However, stricter legislation and licensing would be a step in the right direction.” (Angela Phoenix)
- “especially for reptile 'shows', which can carry serious pathogenic microbial, including antibiotic resistant bacteria= a potential zoonotic risk to the public.” (Anonymous)

- “Actually, I think this should only be done in cases of using animal to educate and this should be done under vet supervision.” (Lynn MacGrath)
- “I believe that any registered business who partakes in such activities, should be held responsible for the animals [in their care, and] be licenced. However, I do not believe that an individual who is partaking in an activity as a hobby i.e. any dog sports (agility, racing, obedience, dog showing etc.) or attending any social gatherings should be licenced as they are not doing so as a business and therefore not gaining any profit from doing so.” (Camille Lambert)

### **Ban Preferred “Yes” Response**

A high proportion of respondents who gave a “yes” response to licensing favoured a ban on animal exhibits.

- “All exhibits of exotic fauna should be banned. These animals (mammals, birds, reptiles, whatever) are especially vulnerable, and should not be exhibited. These events are stressful and could be distressing. Wild animals are not suitable for captivity and exhibiting.” (Virginia Bell)
- “With today’s technology, there is no need at all for any animals to be used for educational purposes at all. If this was stopped completely there would be no need to put measures in place to reduce disease transmission, improve public/animal safety or measures to reduce stress to the animal. There is no justification for the use of animals in this way going forwards but if it continues there should be clear codes of conduct.” (Anonymous)
- “I personally think this should be banned. Animals should not be used for entertainment purposes.” (Leanne Donovan)

Some respondents conceded if a ban was unachievable, licensing was the next best thing.

- “Not in favour of exhibiting animals. But unless there is a ban, strong licensing is the best alternative.” (Karen Millar)
- “[...] licensing will help make sure services meet recognised and universal standards. I don't necessarily agree with 'travelling and static animal exhibits' or taking animals to parties though. Other than a ban, the next best case is licensing.” (Gethin Evans)

### **“No” Response**

Of the remaining respondents, 17.25% elected a “no” response when questioned whether a licensing scheme should be introduced to strengthen existing legislation regarding animal exhibits.

The “no” response to question 3 tended to fall within two categories:

#### **1. Respondents who wanted a ban on animal exhibits**

- “I am not at all comfortable with the use of animals as exhibits, particularly for entertainment but also for purported educational purposes. Such activities represent an exploitative attitude to the animals involved and their welfare is likely to almost always come second to the interests of the exhibitors who may be using the animals for commercial purposes (though non-commercial use will most often not be justified either). [...] Animals should not be being 'exhibited' unless it is for purposes that are directly in the interests of the animals concerned, such as for veterinary education.” (David Grimsell)
- “I do not agree that these kinds of animal exhibits are ethical, nor do they engender the kinds of empathic relations that improve personal wellbeing or promote community cohesion. There are other, less objectifying ways of encouraging people to care more about nature. We do not need 'petting zoos'. Ergo, we do not need licensing of 'petting zoos'.” (Anonymous)
- “I don't believe that these activities should be licensed because I would prefer to see them banned. They can be incredibly stressful for the animals/birds/reptiles.” (Anonymous)

These calls for a ban were mirrored by both OneKind and Born Free:

- “We believe that animal exhibits using wild animals pose an unacceptable risk to animal welfare and should be banned.” (OneKind)
- “[...] feel that the most appropriate, straightforward and enforceable action would be for ministers to introduce a prohibition on the use of wild animals for exhibition or performance, and by doing so set a progressive precedent that could encourage other UK administrations to do the same.” (Born Free)

Animal welfare concerns singled out by OneKind as justification included “Repeated exposure to unfamiliar and sometimes noisy, chaotic, and crowded environments, often without the ability to retreat for the duration of the event” [...] “Frequent long journeys, in vehicles that may or may not be suitable”, and “Insufficient or inappropriate socialisation, training, or acclimatisation to prepare animals for their role.”

In justification of their pro-ban, anti-licensing response, Born Free point to the introduction of licensing for animal exhibits in England and the failings they see as continuing to exist.

## **2. Respondents who felt licensing was not justified and the status quo was sufficient**

- “The existing legislation covers enough.” (Anonymous)
- “...the issues raised as needing a licensing regime are already covered by the AWA. If animals are transported or kept in unsuitable conditions or trained in welfare unfriendly manners then the people responsible can be prosecuted.

How will licensing improve or alter this? Occasional inspections will not do any more to highlight these issues.” (Anne Kasica)

- “What evidence is there of widespread abuse or cruelty?” (Dave Angel)
- “Taking birds and other animals to shows does not need a license- get a grip people look after their show animals.” (Sharon Ward)

### **Educational Role**

One “yes” respondent also referenced existing regulation in their answer and suggested licensing shouldn’t impede exhibits’ important educational role:

- “This is a grey area where some people take money for displays and exhibits but councils do not ensure that they are licensed. There is plenty of legislation to protect animals but it is only used in extreme cases of animal cruelty. However, legislation must not prevent the very important role that enables the general public/children to be educated about animals.” (Anonymous)

Conversely, several respondents argued animal exhibits can have a negative impact and warp public perception and attitudes:

- “[...] research has demonstrated that images alone of wild animals being handled by people can encourage people to seek out similar experiences for themselves and to keep them as pets.” (Gower Bird Hospital)
- “[...] It is our view that the use of animals in exhibits, and particularly [Mobile Animal Exhibits], carries significant risk of impacting negatively on people’s attitudes towards animals. This is especially applicable to children and young people, as animals are often displayed in unsuitable temporary environments that do not reflect their complex needs, or in ways that fail to foster respectful and responsible attitudes towards animals.” (RSPCA Cymru)

### **Regulatory Burden and Cost**

Regulatory burden was also raised as a consideration within the second category of “no” response:

- “Additional paperwork that there is no need for. The welfare of animals will not be improved from it, especially weighed up with value for money. [...] Introducing a licensing fee will discourage people to run events in rural Wales which will kill farming communities.” (Cath Price)

These considerations were not isolated to “no” respondents and though supportive of licensing, CASC for instance echoed similar concerns. They suggest any new licensing regime must set “[...] an appropriate balance between oversight and operational burden to operators and regulators so that poor operators can be tackled without introducing excessive administrative burden. If the operational burden on small operators is set at a level where it is excessive then there is a risk that operators will simply leave the sector.”

Another “Yes” respondent raised similar considerations:

- “Obviously it depends on the type of criteria for such a license, and the cost and how much red tape and mither it is. And if it would have the opposite effect to the improvement in welfare for the animals.” (Ian Corfield)

### **“Don’t Know” Response**

The remaining 11.13% of respondents to question 3 gave a “don’t know” response. The primary reason provided for a “don’t know” response was that respondents felt unable to comment on this area due to a lack of legislative knowledge or familiarity with the area:

- “I don't know enough about the existing legislation to know if it is sufficient or not - suffice to say any changes to future legislation or licensing regulations should put animal rights first.” (Rhian Burgess)
- “I am unfamiliar with the existing legislation for such activities so feel I am “unqualified” to respond further.” (Anonymous)

The range of activities under consideration in this question was also a factor in the “don’t know” response:

- “This is complicated because of the wide range of activities given as examples. The operators of these activities and services should be aware of the existing requirements of the Animal Welfare Act 2006, the Welfare of Animals (Transport) (Wales) Order 2007, and the applicable Codes of Practice that apply to the animals they are interacting with.” (Ann Wennberg)

A couple of “don’t know” respondents also indicated that their selection of a “don’t know” was based on a desire for a ban as opposed to licensing.

- “You didn’t have a box for my desired response - they should not be allowed at all, so licensing is irrelevant!” (Victoria Porter-Burns)
- “Licensing is an ineffectual way to safeguard animal welfare. Only a ban on all of these activities is sufficient to ensure animal welfare.” (Animal Aid)

### **Other considerations raised**

#### **Enforcement**

As with questions one and two, enforcement was a strong theme running throughout responses, including those advocating for consistency, those suggesting greater resourcing and those questioning how enforcement would work.

- “It is essential that for a new licencing regime for Animal Exhibits to be applied consistently and to a high standard then LA’s must receive funding for the

provision of the correct number of staff suitably trained for the role. If this does not happen then the licencing regime will fail to meet its purpose.” (CASC)

- “[...] extremely important to that suitable implementation and appropriate training and enforcement of these new measures should be made possible, through e.g. adequate support and resourcing of Local Authorities.” (CAWGW)

## Scope

It is acknowledged that the scope of question three was broad, reflecting the range of static and mobile enterprises and activities ongoing in Wales, under the animal exhibits umbrella.

Several respondents queried the scope of licensing proposals within their responses. For instance, the RSPCA called for wider activities to be captured, commenting:

- “While it is stated within the consultation document that companion animal shows and competitions are unlikely to be included in the updated licensing regime, significant welfare concerns remain around such exhibits and we therefore urge the Welsh Government to consider including these in scope. Similarly, we question why military mascots, police dogs and police dog displays, and agricultural shows are out of scope as animals exhibited in this way are also transported around for exhibition, held in temporary housing and exposed to very stressful experiences similar to other exhibited animals, with no external oversight.” (RSPCA)

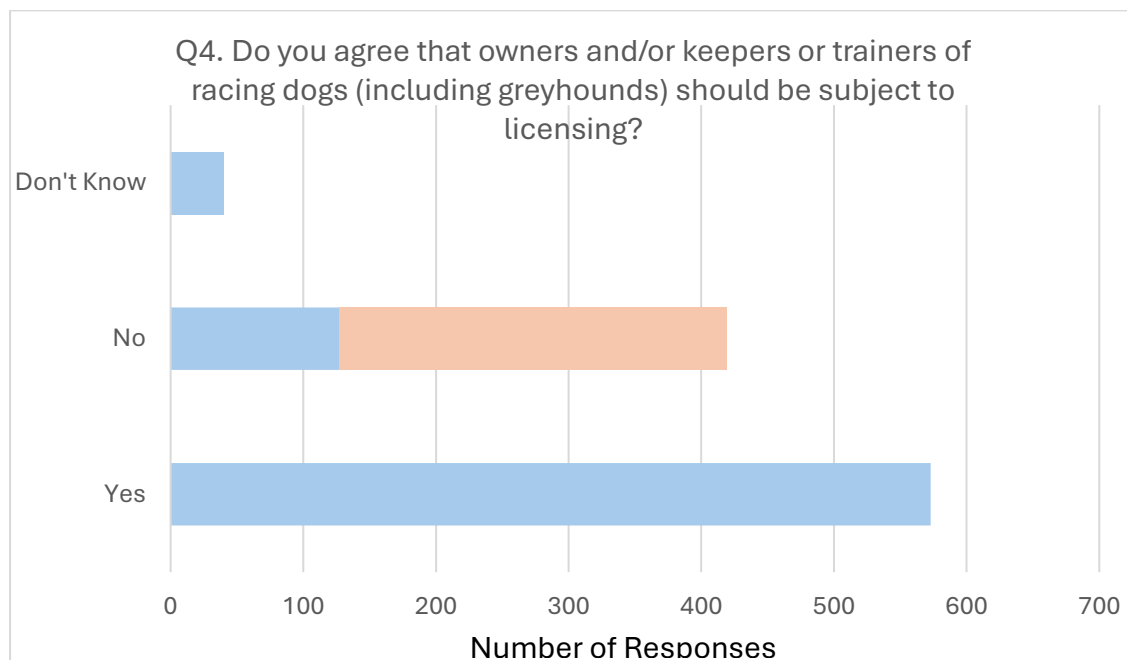
Conversely, several respondents sought reassurance that agricultural events would be out of scope:

- “With specific reference to agricultural related exhibits, members felt strongly that livestock keepers already adhere to a wealth of regulation pertaining to the health and welfare of farmed animals. Such regulation covers a wealth of issues including on-farm welfare, welfare at transport, welfare at slaughter and welfare at market [...] Members requested to seek assurances that as a result of the wealth of regulations livestock keepers already comply with, that this should also instinctively exclude any additional licensing requirements on livestock for educational or entertainment purposes.” (FUW)
- “The definition of exhibits is questionable as how it differentiates between showing animals at agricultural and breed shows to exhibiting animals at pony parties. If this excludes showing, then yes, licence exhibitions to improve and maintain animal welfare, I see worrying trends where pony parties see horses being used to paint and draw on.” (Lester Dagge)

## **Question 4**

Question 4 asked whether owners and/or keepers or trainers of racing dogs (including greyhounds) should be subject to licensing.

A total of 1032 responses were received for question 4, 55.52% of respondents (573) were in favour of licensing, 40.60% of respondents (419) were against licensing, with 3.88% of respondents (40) don't know.



### **Those in favour of licensing owners and/or keepers or trainers of racing dogs (including greyhounds).**

573 (55.52%) of respondents selected they were in favour of licensing owners and/or keepers or trainers of racing dogs (including greyhounds).

Of the 573 responses:

- 329 respondents, (31.88%) were also supportive of a phased ban asked in Q5.
- 170 respondents (16.47%) were **not** supportive of a phased ban asked in Q5.
- 70 respondents (6.78%) were undecided on a phased ban.
- The remainder (0.39%) declined to answer question 5.

### **Those not in favour of licensing owners and/or keepers or trainers of racing dogs (including greyhounds).**

419 (40.60%) of total respondents selected they were not in favour of licensing owners and/or keepers or trainers of racing dogs (including greyhounds). 127

responses were individual responses, whilst 291 responses contained a campaign response mirroring that submitted by the League Against Cruel Sports (292). These responses are considered as part of this analysis.

Of the 419 responses: (This included 292 campaign responses and 127 individual responses).

- 327 respondents (31.60%) were also supportive of a phased ban asked in Q5.
- 80 respondents (7.75%) were **not** supportive of a phased ban asked in Q5.
- 12 respondents (1.16%) were undecided on a phased ban.

### **Those who don't know whether there should be licensing of owners and/or keepers or trainers of racing dogs (including greyhounds).**

40 (3.88%) of total respondents selected 'Don't Know' in response to licensing owners and/or keepers or trainers of racing dogs (including greyhounds). Of these 40 responses:

- 7 respondents (0.68%) supported a phased ban.
- 6 respondents (0.58%) were against a phased ban.
- 23 respondents (2.23%) were also undecided on a phased ban.
- The remainder (0.39%) declined to answer question 5.

The analysis of the responses aims to highlight the range of differing opinions within responses to better reflect the response to the question. For example, some people did not wish to introduce licensing because they feel the industry is currently sufficiently regulated and would like to see greyhound racing continue, whilst others favoured an immediate ban and so felt licensing was an unnecessary step.

The significant majority of respondents were in favour of licensing owners and/or keepers or trainers of racing dogs (including greyhounds). There was specific support for the licensing of owners and/or keepers and trainers involved in commercial greyhound racing throughout the responses.

There was a split in the opinion from those supportive of the industry and keen to see its survival, and those who are not supportive of the industry, but many see licensing as an important step to addressing a wide range of welfare concerns.

### **Responses that were in favour of licensing and also supportive of the consideration of a phased ban asked in Q5.**

329 respondents, 31.88% of total responses.



The overwhelming argument in this group was that as much as possible had to be done to protect the welfare of racing greyhounds now, with a view to phasing out greyhound racing in the future.

Respondents highlighted that a robust licensing regime was welcomed to ensure high welfare standards of racing dogs throughout their whole life. Many respondents in this group were unaware that statutory licensing was not in place and expressed concern with this position.

Respondents highlighted several welfare concerns in relation to commercial greyhound racing including:

- the rate of injuries and euthanasia during racing,
- overbreeding and wastage,
- insufficient kennelling,
- husbandry and transportation,
- retirement process
- the lack of any current statutory regulation of the industry.

Respondents in this group felt industry led regulation was not sufficient to address these concerns and government regulation and licensing would help to support the welfare of dogs used in racing.

- “If the racing of dogs is not to be banned as soon as possible [...] then clearly any owners/keepers of racing dogs like greyhounds should be licensed in order to minimise the abuse and suffering that is known to be commonplace inside greyhound racing, in particular.” (Mr Kim Singer)
- “I personally would prefer to see dog racing come to an end. There is significant abuse in the system - and many dogs are injured or just disappear each year. A properly enforced system - where dogs have proper care and are inspected regularly would be a good start” (Rachel Barber)
- “Many owners/trainers take animal welfare very seriously. However, there are some that see their dogs purely as assets which will make them money. There should be compulsory licensing and spot checks on dog welfare, nutrition, vet care, etc. Also, strict conditions on what will happen to dogs at the end of their racing life whether due to age or injury. ALL should be guaranteed a decent home where they will be looked after - not abandoned or euthanised for purely business reasons.” (Yvie Bernett)
- “The track in Wales is already a G.B.G.B. licensed track and as such trainers are required to be licensed. However, as the regulator is not independent but instead is made up of individuals involved in greyhound racing it provides little protection for greyhounds...” (Susan Lewis)
- “Battersea would strongly recommend regulation of Greyhound racing go beyond solely regulating the stadia to also account for trainer kennels, where

in the case of racing Greyhounds spend 95% of their lives, and ensure any regulation has the highest welfare impact. [...] At GBGB-regulated tracks there are safeguards for the welfare of racing Greyhounds concerning the quality of the surface, their health and any risk factors for injury for which an appointed trackside vet is responsible. Regulation should be robust and based on proven enforceable standards that are designed to safeguard welfare.” (Battersea Dogs and Cats Home)

- “We strongly believe that the training and housing of any animal for business use should be monitored, licensed, registered and inspected, and penalties should be enforced. In addition, we feel strongly about the potential loopholes surrounding export and exploitation of racing dogs.” (Communities for Horses)

Some respondents recognised how licensing could provide information and evidence in which to base future decisions on.

- “Licensing ensures that establishments are subject to a minimum level of standards, have the resources, knowledge, and skills necessary to properly care for animals, and enables the public to make more informed choices about which establishments they should use and support.” (Anonymous)
- “To maintain strict standards of care for the animals, to ensure they are not over worked, over bred or mistreated and that they are kept in suitable conditions. Licencing would prevent those who are found to be in breach of standards from continuing to engage in activities and create a monitored list so they can't just move and set up shop somewhere else.” (Anonymous)
- “Licensing serves as a protective measure for racing dogs, ensuring their well-being and promoting responsible ownership and training practices. It’s a crucial step toward a more compassionate and accountable approach to animal sports.” (Gower Bird Hospital)

A number of respondents had concerns on the capacity to effectively enforce any licensing regime.

- “If such system would be adopted - who would be responsible for licensing? We feel strongly that adequate resources should be ensured for the Public Sector to implement standards that already exist in the field of animal establishment licensing...” (Gwynedd County Council)

There were other concerns involving the commercial industry affecting welfare.

- “We at AGTV (Association of Greyhound Track Vets) believe this is essential for anyone with more than 3 racing dogs. Welfare costs have risen steeply over the last few years in greyhound racing. This has not been balanced by an equivalent rise in either 'run' or 'prize' monies to compensate for these fast-rising welfare costs. Hence Greyhound trainers are under huge financial pressures to cut costs.” (Association of Greyhound Vets)

- “Some have way too many dogs, including puppies, that they cannot possibly satisfactorily look after them all to the accepted animal welfare standards. There are thousands of ‘surplus’ greyhounds which are put up for adoption, dumped or killed every year. UK pounds are full; greyhound rescue centres are full; dog rescue centres are full – the rescue business is in crisis...” (Anonymous)

**Responses that were in favour of licensing but not supportive of the consideration of a phased ban asked in Q5.**

170 respondents 16.47% of total respondents.

Many in this group were generally supportive of the greyhound racing industry. There was overwhelming support for an effective licensing regime, to ensure high welfare standards are met by owners, keepers and/or trainers and that greyhounds in all stages of their lives could be well cared for.

Many of respondents in this group felt it important for government to work with the current industry led regulation to ensure high welfare standards and transparency within the industry.

- “The Greyhound Board of Great Britain (GBGB) stated in their response: As the regulator for British licensed greyhound racing, the (GBGB) firmly believes in the importance and benefit of having rigorous, appropriate regulation in place for the sport in Wales. [...] another vital change under GBGB regulation is that all trainers and kennel hands involved in the care and husbandry of greyhounds racing at the track must be licensed. Owners must also be registered with GBGB. [...] We believe that greater regulation is the only successful way to protect and promote greyhound welfare and that GBGB’s licensing system offers an effective existing solution for doing so within Wales.” (Greyhound Board of Great Britain)
- “BVA and BSAVA welcome the Welsh Government’s proposals to licence greyhound racing in Wales. We supported the introduction of the Welfare of Racing Greyhounds Regulations 2010 in England, and the subsequent licensing of tracks through GBGB. While there are still potential areas for improvement, it is of concern that there are currently no comparable regulations in Wales, although the one operational track has recently come under the aegis of GBGB. While these dogs are ultimately protected under animal health and welfare legislation, more specific regulation and licensing could do much to protect the health and welfare of racing greyhounds in Wales. It would allow injuries and poor welfare standards to be prevented, rather than prosecuting once the damage has been done.” (British Veterinary Association and British Small Animal Veterinary Association)
- “Licensing would facilitate regulatory oversight of the racing dog industry, allowing authorities to monitor compliance with licensing requirements through inspections, audits, and enforcement measures. This can help ensure transparency, accountability, and adherence to legal and ethical standards within the industry...” (Anonymous)

- “With all personnel involved in handling the greyhounds now licensed by GBGB, I certainly feel the current licensing is highly beneficial, with so many procedures in place to protect racing greyhounds throughout their lives. [...] Having a support system in place for all greyhounds across their lives is so important, and as the greyhounds at the Valley are now housed at licensed trainers' kennels, which are independently audited by UKAS, I can be sure that the dogs are receiving the highest standards of care away from the track.” (Anonymous)
- “As a trusted partner within the horse racing and greyhound industries for over 35 years, Sports Information Services Ltd (SIS) is fully supportive of Animal Welfare Establishments being subject to licensing. We are undoubtedly committed to ensuring the highest standards of welfare within animal racing.” (Richard Brankley – Sports Information Services Ltd)

Respondents here also highlighted that licensing could provide a clear evidence base on which to base future decisions on.

- “Greyhound racing should not be considered different to any other sport that includes animals and should be treated in the same manner. Adequate laws and detailed regulations are in place and should continue to be monitored, reviewed and updated accordingly in order to ensure that they are enforced and deviations from those terms dealt with through the legal system.” (Anonymous)
- “To prove that greyhounds are probably the most cared for animal in public and private ownership. And to provide strong evidence that they are well cared for.” (Anonymous)
- “To prove that greyhounds are probably the most cared for animal in public and private ownership. And to provide strong evidence that they are well cared for.” (Anonymous) “Licensing could help ensure that individuals involved in racing dogs are knowledgeable about animal care, handling, and welfare. By establishing licensing requirements related to housing, nutrition, veterinary care, and training methods, authorities can promote responsible practices and mitigate the risk of neglect, abuse, or exploitation of racing dogs”. (Anonymous)

### **Responses that were not in favour of licensing and were in favour of the consideration of a phased ban.**

34 individual respondents and 292 (326) campaign responses, 31.59% of total respondents.

This group expressed concern that the current lack of government legislation and the current industry led regulation is not sufficient to protect the welfare of dogs used in greyhound racing. They felt that the licensing of owners' keepers and/or trainers of racing dogs was not going to address welfare concerns, citing the rate of injuries and euthanasia caused by racing, not ensuring adequate protection throughout a

greyhound's life, the perceived lack of transparency and traceability, and the level of reliance on the charity sector for rehoming.

- “I do not agree that this is the appropriate remedy for the set of challenges presented by greyhound racing. Licensing trainers will not impact excessive numbers of greyhounds bred, nor will it sufficiently address the hazards caused to greyhounds through oval track racing. Licensing trainers does little to impact the industrial breeding, rearing and schooling practices that continue to produce populations of traumatised and damaged dogs. It does not address the systemic harms inherent in greyhound racing.” (Anonymous)
- “[...] no licensing can properly safeguard the welfare of racing greyhounds or end the risks of injury and death inherent to the ‘sport.’ A phased ban would significantly improve the quality-of-life of greyhounds across Wales. It would make it clear that allowing greyhound racing to continue contradicts Welsh Government’s commitment to the highest animal welfare standards.” (Lorraine Ellis)
- “The Cut the Chase coalition does not support the licensing of trainers or keepers of greyhounds. We believe that the only option to safeguard greyhound welfare is to introduce legislation that will prohibit the racing and/or keeping of greyhounds for the purposes of racing in Wales. Any delay through exploring intermediary measures to regulate aspects of the industry will prolong the suffering of racing greyhounds in Wales when the most effective action would be to remove the inherent risks of the industry itself.” (The Cut the Chase Coalition)

Individual respondents in this group also felt licensing wouldn't go far enough.

- “I think this sport should be banned full stop. By licensing, it is condoning the use of greyhounds for racing. There will always be people who still abuse these animals if a license is required. Banning completely stops this almost entirely. As any illegal racing will slowly be brought to attention.” (Tina Boschen)
- “The licensing of the abuse of greyhounds who race will not improve their welfare. The racing industry is not about welfare of the animals but about making money for the betting industry.” (Jane Dodds MS)
- “We share the disappointment of other animal welfare organisations that the Valley Greyhounds Stadium was recently licensed by GBGB. We do not think self-regulation is an appropriate model for this activity and we do not expect that this move will improve the welfare of any of the dogs raced within the stadium. A move to a phased ban would safeguard future generations of greyhounds, drastically improving their welfare at all stages of their lives and protecting them from the risks of injury and death inherent to racing. Public opposition to greyhound racing is growing and the industry is losing its social license to operate.” (Naturewatch Foundation)

291 Respondents mirrored a submission from League against cruel sports (292) and were critical of a licensing regime.

- “[...] There has been licensing in England for over a decade with the Welfare of Racing Greyhounds Regulations 2010 alongside a parallel system of industry self-regulation. Despite increased regulations and measures put in place to support the welfare of racing greyhounds thousands of injuries continue to occur annually and far too many die on the track and for other reasons such as being ‘designated unsuitable for rehoming’[...] Therefore, both licensing by local authority and the industry’s own self-regulation is clearly inadequate to protect greyhounds. Only a move to a phased ban would safeguard future generations of greyhounds, drastically improving their welfare at all stages of their lives and protecting them from the risks of injury and death inherent to racing.” (League against cruel sports)

Many respondents in this group felt that addressing welfare concerns for living conditions, breeding and husbandry could not address the dangers of racing. Studies and publicly available statistics were referenced in several responses.

- “Research indicates that a licensing regime cannot reduce the suffering greyhounds face as adequately as a phased ban could. For example, Professor Andrew Knight, a veterinary Professor of Animal Welfare, produced a report in 2018 entitled “Injuries in Racing Greyhounds”. In addition to highlighting high levels of injury and deaths at GBGB tracks, its findings include that ‘round or oval tracks, and the uniformly anticlockwise passage of greyhounds, create the greatest injury risks these animals are routinely subjected to’ - a fact which demonstrates the inherent risks which cannot be regulated away through a licensing scheme.” (League against cruel sports)
- “Naturewatch Foundation strongly supports a phased ban of greyhound racing and urges the Welsh Government to bring forward proposals as soon as possible. Greyhound racing is a cruel sport that causes injury and death to thousands of greyhounds, with statistics from the Greyhound Board of Great Britain (GBGB) showing that between 2018 and 2021, over 2,000 greyhounds died and nearly 18,000 injuries were recorded. Further statistics from GBGB show that in 2022 alone, 244 dogs died or had to be put to sleep as a result of racing, and that there were 4,354 injuries reported across Great Britain. [We think] that one death from this sport is too many and finds these figures entirely unacceptable in a dog-loving nation.” (Naturewatch Foundation)

### **Responses not in favour of licensing and not supportive of the consideration of a phased ban asked in Q5.**

80 Respondents, 7.75% of total respondents.

This group were mainly supportive of the industry and felt no licensing was required as they were supportive of the current industry-led regulation by GBGB.

- “Racecourse promoters Association Limited (RCPA) has, since its incorporation in 1988, only supported licensed greyhound racing, all member

racecourses have to hold a Track Operating Licence, currently issued by [GBGB] to remain in the Association. [...] Racing in Wales has historically been of the unlicensed code, and it is a major step forward that the Valley racecourse in Caerphilly, reopened in 2023 as a licensed [GBGB] racecourse. The greyhounds now have a licensed kennel each whilst at the racecourse, oversight of the racing by licensed stewards, a licensed veterinary surgeon and surgery immediately available onsite, home kennels to a licensed and PAS 251 standard and, an often overlooked factor, stability of funding to ensure that the welfare standards required by the regulatory body can always be met. It is logical that the licensing regime is applicable to every individual in that chain directly in contact with, or responsible for, greyhound racing.” (Racecourse Promoters Association Limited)

- “They are subject to rigorous licensing already by the Greyhound Board of Great Britain. Greyhounds are subject to greater regulation than any other breed of dog. Government involvement beyond GBGB is unnecessary and undesirable.” (Anonymous)
- “There is no need for licensing by the Welsh Government for owners and trainers of racing greyhounds. Racing greyhounds are already subject to regulation and protection that is additional to the existing legislation.” (Alison Duce)

### **Responses that selected ‘Don’t know’.**

40 Respondents, 3.88% of total respondents.

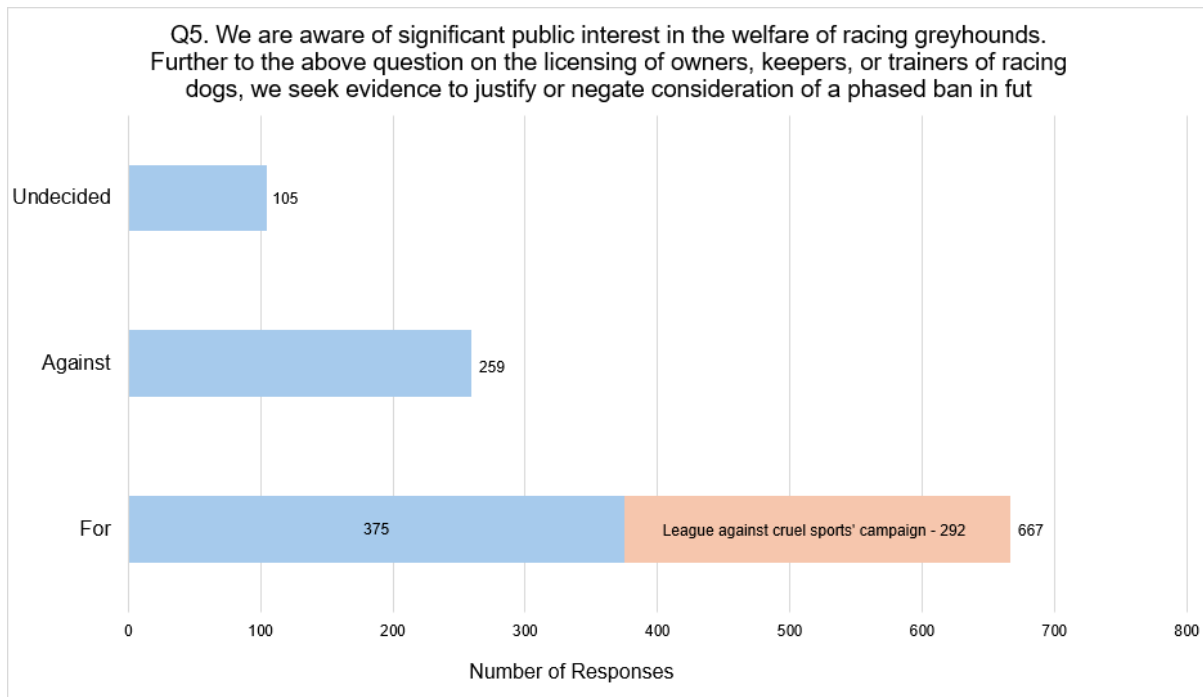
The significant majority of respondents who selected ‘don't know’ did not leave comments or additional information, or simply stated they weren’t in a position to comment. Of the small amount that did leave a comment opinions differed.

- “[GBGB] already operate a licensing scheme for both trainers and kennel staff. Any proposed changes to legislation or the introduction of licensing should be made in consultation with existing arrangements.” (Female Falconers Club)
- “Dwi methu ateb ydw neu nacydw i hwn, oherwydd bod trwyddedu rasio milgwn yn rhoi'r argraff bod modd cael lefel o lesiant o fewn y gweithgaredd. Does dim modd gwarchod llesiant milgwn yn y diwydiant rasio. Mi fyddant yn dal i gael eu hanafu a'u gor-fridio a'u trin fel “wastage” pan mae eu dyddiau rasio ar ben neu yn methu dechrau. Rhaid gwahardd rasio milgwn.” (Anonymous)
- “I don't think they need licensing as it is not necessary a commercial venture but I do agree that they should have to be registered and monitored by their own internal body to maintain standards of care and encourage whistleblowing by those in the industry and allow practices that are outdated to die out.” (Anonymous)

## **Question 5**

Question 5 asked for evidence to justify or negate consideration of a phased ban on greyhound racing in future.

A total of 1031 responses were received for question 5. 64.69% of respondents (667) were in favour of a phased ban, 25.12% (259) were against a phased ban, with 10.18% (105) undecided.



### **Those in favour of the consideration of a phased ban on greyhound racing in future.**

667 (64.69%) of total respondents were in favour of a phased ban. Of these responses:

- 292 respondents (28.32%) contained a campaign response mirroring that submitted by the League Against Cruel Sports
- 375 respondents (36.37%) were individual responses.

All are considered in this summary.

Of the group in favour of a phased ban, there was a split in those that supported licensing discussed above in Q4 analysis and those that didn't see value in licensing and want to move towards a ban in the short term. For this summary those in favour of a phased ban regardless of why are grouped together in the analysis.

### **Those against the consideration of a phased ban on greyhound racing in future.**



259 respondents (25.12%) were against a phased ban.

Of the 259 responses:

- 188 respondents (18.23+%) stated they were supportive of the greyhound racing industry in additional information submitted.
- 15 respondents (1.45+%) stated they were against a phased ban because they are calling for a complete and immediate ban.
- 56 (5.43+%) respondents did not submit further comments or additional information.

### **Those who were undecided on the consideration of a phased ban on greyhound racing in future.**

- 105 (10.18%) of total respondents were undecided.

The themes in the analysis of the responses aim to highlight the range of differing opinions within the responses to better reflect the response to the question. For example, some people did not wish to consider a phased ban because they feel the industry can be sufficiently regulated and would like to see greyhound racing continue with others wanting an immediate ban.

There was a split in the opinion from those supportive of the industry and keen to see its survival, and those who are not supportive of the industry, but many see licensing as an important step to addressing a wide range of welfare concerns. As discussed in the summary of question 4, there was specific support for licensing owners, keepers, and trainers involved in commercial greyhound racing. This support was evident among those who favoured phasing out greyhound racing. Respondents generally expressed that greyhound racing in Wales lacked regulation, which many felt brought increased criticism of the industry. Many respondents wanted to thoroughly understand the consequences of a ban and preferred phasing it out over time. There was a range of responses to the question.

### **Responses that supported the consideration of a phased ban.**

667 responses (64.69%) of total respondents.

Overall, this group expressed strong concern for the welfare of greyhounds, a sense of urgency to end greyhound racing, and a belief that the industry is unethical and no longer has a social license to operate. Key concerns included welfare issues, injuries, euthanasia, overbreeding, inadequate or absent legislation, and a desire to prevent unnecessary suffering and deaths. Many in this group highlighted the moral and ethical argument of using dogs for recreational sport and highlighted a change in societal attitudes.

As in Q.4 respondents highlighted several welfare concerns in relation to commercial greyhound racing including:

- the rate of injuries and euthanasia during racing,

- overbreeding and wastage,
- insufficient kennelling,
- husbandry and transportation,
- retirement process and pressure on the rescue sector.
- the lack of any current statutory regulation of the industry.

GBGB data and statistics were referred to in several responses, respondents referenced the injury and euthanasia statistics in publicly available records from [GBGB](#). Hope Rescue's *Amazing Greys* project was also referenced in responses along with academic papers.

- “[...] Based on our observations and work during the project, we did not consider there to be any effective welfare oversight of greyhound racing in Wales, and submitted evidence to the Petitions Committee at its meeting on 23<sup>rd</sup> May 2022: <https://record.senedd.wales/Committee/12836>.” (Hope Rescue)
- “A phased ban would allow independent rescues time to assess, treat & rehome ex racing greyhounds responsibly.” (Sarah Branson)
- There are a number of serious welfare concerns associated with greyhound racing, which apply to these dogs from birth to retirement - and beyond. Key welfare concerns relate to the ‘wastage’ of greyhounds in the industry, standards within kennelling, husbandry and transportation, and the injuries racing greyhounds sustain.” (Professor Andrew Knight BSc)
- “Greyhound Rescue Wales believes that greyhound racing, including the breeding, training and keeping of greyhounds for racing is unethical and no longer has a social license to operate in Wales. The only effective way of protecting the welfare of racing greyhounds is the swift introduction of a ban on all aspects of the “sport” in Wales. In the absence of such a ban, however, we believe that the industry cannot be left to regulate itself and that WG and WLA’s must ensure that all greyhounds are afforded full protection under the law.” (Greyhound Rescue Wales)
- “[...] We are urging the Welsh Government to introduce a phased ban on greyhound racing. We are calling for greyhound racing to come to an end as soon as possible in Wales, and across the UK, to put a stop to the unnecessary and completely preventable deaths of hundreds of dogs every year.” (The Cut the Chase coalition)

The RSPCA is among the many animal welfare organisations who stated they *strongly support a phased end to greyhound racing in Wales* and mirrored the response of ‘*Cut the Chase*’.

Individual responses mirrored the welfare concerns raised by others and highlighted further points such as the gambling industry and the moral and ethical argument.

- “A phased ban of greyhound racing in Wales is the only the only right course of action to take, to halt the greyhound industry’s perpetual wasteful and unsustainable cycle of importing greyhounds from Ireland, commercially exploiting them to generate income from run moneys paid by the gambling industry and discard them to rescue charities once they have become non-profitable or injured.” (Anonymous)
- “The ethical arguments provided in current academic literature support a greyhound racing ban on two principals: our duties towards sentient nonhuman animals and duties to persons/mankind. [...] as evidenced below: 1) the interests of the dogs are more often than not sacrificed for human benefits (e.g. track safety is ignored to ensure races proceed), 2) the dogs are regarded as little more than commodities (e.g. excessive breeding and culling of greyhounds), and 3) the implicit and explicit suffering and harms experienced by the dogs are extensive and pervasive (e.g. racing injuries, veterinary care, live export). In short, the costs to the dogs are significant, unnecessary and incongruent with our duty of care...” (Greyhound Racing Wales)
- “[...] I think the injury rate is unacceptable & the treatment of greyhounds at the end of their racing lives appalling. We once approved of dog fighting & other inhumane 'sports'. I like to think we have moved beyond that.” (Anonymous)

Similarly to Q4, many responses centred around the welfare concerns of the whole life of the greyhound and also highlighted pressures on the rehoming sector.

- “Concerns for the welfare of the racing dogs cover all stages of their lives, both on and off the track. With only one remaining track in Wales, the Valley Greyhound Stadium, we are calling for Wales to lead the way and be the first nation in the UK to end greyhound racing.” (Dan Rose)
- “Over many years I have seen no evidence that Greyhound racing regulation will ever work. Back in the 1920's it may have been a decent working man's "sport" however times have changed and we must reflect that in our actions. [...] More and more dogs means a conveyor belt of greyhounds being imported from Ireland mainly, or bred in UK. Those dogs are used until no longer profitable and then what?.” (Seonaig Anderson)
- “A phase-out of greyhound racing is the only way to bring about an end to overbreeding of greyhound puppies, culling, injury & death risks, doping of racing dogs, instances of neglect in trainers' kennels and the annual wastage of thousands of ex-racing greyhounds passed to charity rescue centres with insufficient funding by a profitable gambling industry [...]” (Anonymous)
- “[...] the industry relies heavily on the non-profit rescue sector to take ex-racing and surplus dogs off its hands, with the RSPCA estimating that 5,000 dogs exit the industry each year. We appreciate that a bond is paid for each retired dog to help with rehoming, but at a time when the animal rescue sector

is struggling with capacity and rising costs more than ever, we do not consider it to be ethical for private industry to continue to compound these difficulties by adding to the high population of dogs seeking homes.” (Naturewatch Foundation)

- “Rescues are left to pick up the pieces from the aftermath of this ‘sport’.” (Charlotte Copik Phillips)
- “My concern is that rehoming thousands of dogs when rescue centres are already full to capacity will be a nightmare. How will these poor souls all find homes. The law must incorporate a limit on how many dogs are bred, numbers need to be greatly reduced. My fear is euthanasia will be considered and that shouldn't be the case. I want a ban, it can't come soon enough. However, the protection and welfare of these dogs is paramount in either case.” (Anonymous)
- “A phased ban would give owners and trainers time to organise the proper timescale of a racing dog and see there is appropriate facilities for less breeding and care for dogs unable to race, i.e. rehoming...” (Anonymous)

A campaign from the organisation League Against Cruel Sports attracted 292 campaign responses in addition to the organisation's own individual submission. These responses were not in favour of licensing owners and/or keepers or trainers of racing dogs (including greyhounds) to licensing in question 4 above, and selected they were in favour of the consideration of a phased ban on greyhound racing.

- “[...] A phased ban would significantly improve the quality-of-life of greyhounds across Wales. It would make it clear that allowing greyhound racing to continue contradicts Welsh Government's commitment to the highest animal welfare standards. [...] Research indicates that a licensing regime cannot reduce the suffering greyhounds face as adequately as a phased ban could. [...] The League Against Cruel Sports 2014 report entitled “The State of greyhound racing in Great Britain: a mandate for change”, also found worrying details such as poorly maintained tracks and racing frequency causing lethal and painful injuries such as broken backs and limbs, the abandonment of unwanted greyhounds and unfortunately dogs being killed crudely. Therefore, both licensing by local authority and the industry's own self-regulation is clearly inadequate to protect greyhounds. Only a move to a phased ban would safeguard future generations of greyhounds, drastically improving their welfare at all stages of their lives and protecting them from the risks of injury and death inherent to racing.” (League Against Cruel Sports Campaign Response)

### **Responses that were against the consideration of a phased ban.**

259 respondents (24.12%) of total responses.

Many in this group specified in the additional information they were supportive of the industry.

Respondents reasoned a phased ban on greyhound racing would have an economic and cultural impact. Comments mentioned the potential effect on livelihoods, erasing a culturally significant sport, prejudice of specific demographics, and the possible extinction of racing breeds.

Many in this group suggested further regulation and licensing could address welfare concerns without needing a ban. Some highlighted existing regulation by the Greyhound Board of Great Britain (GBGB), which focuses on welfare through initiatives like "A Good Life for Every Greyhound."

Some respondents fear that banning greyhound racing could set a precedent for banning other animal sports, such as horse racing, show jumping, and dog agility, leading to broader cultural and economic impacts.

Quotes in this theme included:

- The Greyhound Board of Great Britain (GBGB) submitted a detailed response outlining how they "[...] are committed to ensuring best practice controls and oversight through regulation, and a long-term holistic approach to welfare through their long-term welfare strategy, '[A Good Life for Every Greyhound](#)', which was launched in 2022. They also have committed [...] to collecting further evidence and highlighting the ongoing need for research on welfare issues such as early years, re-homing, open transparent regulation and stakeholder engagement." (The Greyhound Board of Great Britain (GBGB))
- "A phased ban is completely incorrect and will cost the livelihoods of many people across the United Kingdom, and effectively wipe out a breed of dog that has a great history in the UK. Now is a time to stand by the sport." (Anonymous)
- "There is no evidence to suggest that racing greyhounds are treated any differently to racehorses. Horse racing has more significant welfare problems but those opposed to Greyhound racing see it as an easy target and a first step to banning all equine sports." (Anonymous)
- "My Submission is against [any type of ban] [...] we have seen with countless other domesticated animals the one way to guarantee their extinction is to deny them their purpose/job (place in the world). The greyhound is one of the oldest breeds of dog in the World renowned for their speed, strength, grace and beauty a true pleasure to see and care for, the only way to ensure this breed's safe and healthy future is to let them do what they love, RUN." (Anonymous)
- "Greyhound racing is already heavily regulated by the GBGB. Welfare is already at the head of its agenda. Greyhound love to run. The myth that greyhounds are made to run is nonsense. Dog walkers throw balls to dogs in parks for them to chase. Should we ban this too?" (Anonymous)
- "If the sport is properly regulated, and good care and attention is maintained by all who take part, there should be no reason to ban an ancient sport that

the dogs themselves thoroughly enjoy. If the ban is implemented, it will only serve to push the pastime underground. Loss of economic and cultural identity for the Welsh people.” (Camille Lambert)

- “We would suggest that it would be premature to ban greyhound racing in Wales without giving a licensing scheme an opportunity to demonstrate that racing can be regulated and operate to acceptable welfare standards.” (The Kennel Club)
- “I’m against a future ban. These dogs love what they do and are treated well. If establishments are licensed then that should mitigate any need for a ban. Those who are in favour of a ban often are uneducated about the breed, the sport, and the real current day conditions. Decisions such as this should not be made by public interest, instead by facts, industry experts, and veterinarians who work closely with the dogs in question.” (Anonymous)
- “If dog racing is banned, are the horses going to be banned too? What’s next - show jumping? Dog Agility? Dog showing amongst a host of other hobby sports that owners and dog enjoy together? Where will it end?” (Camille Lambert)
- “Greyhound Racing is superbly regulated in the UK, both as to the sport itself and to WELFARE concerns. A vociferous social media campaign from a tiny, bigoted and mendacious minority has been allowed far too much influence in Wales’s Senedd, with politicians keen to jump onto what they - wrongly - perceive as a populist bandwagon. [Their objective] has nothing to do with greyhound welfare [...] and everything to do with spoiling traditional, working class sporting pleasures.” (Christopher Webber)

Respondents highlighted social and economic arguments.

- “There would be a harmful impact on the welfare of greyhounds and the local community of Caerphilly. All the staff that have been taken on at the stadium would become unemployed, local suppliers would lose out on business and the local community would not have a place to visit.” (Valley Greyhounds Ltd)
- “We have invested almost £2 million pounds to date on the site in Ystrad Mynach that we purchased for the purpose of running as a greyhound racing stadium. We never would have invested in the stadium if there had been talk of a ban in Wales. We have installed a new racing office, vets’ room and industry leading racing kennels. We have extended the stand for to allow for an increased in public attendees. [...] We have employed a number of people for the local community. People that have previously been unemployed, on universal credit or had mental health issues now have a place to work. The greyhound industry is its own community and has given people something to be part of.” (Valley Greyhounds Ltd)
- “Greyhound racing is an intrinsic part of British working class leisure and past time. When regulated properly, it is a safe and enjoyable sport for participants and the animals.” (Anonymous)

### **Those who were against the consideration of a phased ban and call for a complete and immediate ban.**

A few responses advocated for an immediate ban, expressing the opinion of those who backed a phased ban but believed that phasing or a careful evaluation of unintended consequences was unnecessary.

15 responses (1.45%) of total responses:

- “Why phased? These dogs have been put through enough, phased gives time for more greyhounds to be born into this disgrace of a “sport” and dumped afterwards broken and dangerous to the public.” (Lucy James)
- “It needs banning completely I have been in the world of rescuing greyhounds for 30 years. Never seen a dog come out of the racing industry not broken!! Self regulation doesn’t work. Animals suffer!” (Lauren)
- “Greyhound racing should be banned immediately. Every race that is run is putting these animals at risk of injury. Some are kept in dreadful conditions, so every week the sport continues lengthens the dogs suffering.” (Maria Harding)

### **Responses that were undecided on the consideration of a phased ban.**

105 responses (10.18%) of total responses.

Many responses that were undecided stated they had limited knowledge of the greyhound racing industry and declined to comment.

Some were as yet undecided as they had fears as to whether a ban could have the potential to create unintended consequences that could be detrimental to the welfare of greyhounds and racing dogs. Examples raised included the possibility of promoting illegal racing and the inability for rescue centres to cope or attract funding.

- “[...] an outright ban could have negative impacts on animal welfare if existing greyhounds are suddenly retired, having no residual economic value to the owner. Any ban should be accompanied by a robust transition process that ensures the welfare of existing animals. It is essential that clear guidance is provided for existing owners and anyone delegated to enforce new regulations with respect to transitional arrangements for the rehousing/ rehoming of the animals, or their disposal. In particular, animals must not continue to be disposed to suboptimal conditions which would further compromise their welfare. In addition, we would suggest some degree of involvement of experienced vets in this transition process for welfare reasons (unless or until it is banned). This would be subject to availability given the existing pressures on the veterinary sector.” (British Veterinary Association and British Small Animal Veterinary Association)
- “If tighter regulation and licensing can lead to improvements in the welfare and care of greyhounds being raced, and reduce the incidence of injury and

death, then a ban may be excessive (and may worsen welfare as it would drive underground those, who still wish to race their dogs, thereby avoiding public scrutiny and checks). However, if greater oversight and regulation does not lead to an improvement, then a ban should be considered. Efforts should be made to systematically collect evidence regarding the welfare of racing greyhounds to inform future decisions.” (Stephen Wickens)

- “Greyhounds are bred for a purpose, I'm not sure removing that purpose is a good thing or not. There are so many working breeds that are kept as pets which are not suitable due to their working genetics. These breeds show behavioural and temperament problems with owners unable to cope. Removing racing could leave greyhounds open to the same outcome.” (Anonymous)
- “Currently there is only one track in Wales which has recently been taken over by GBGB and whilst they apply their conditions to the premises, the underpinning regulations are England only (The Welfare of Racing Greyhounds Regulations 2010). There is a need for appropriate, enforceable controls being introduced in Wales.” (Monmouthshire Trading Standards)
- “It is conventional for bans to be introduced following the failure of regulatory solutions. In the case of Greyhound racing in Wales, regulatory solutions have never been attempted, so it is hard for anyone to say with certainty whether a regulatory framework would work. However, such a framework should cover the whole life of the Greyhound (as the new GBGB Welfare Strategy seeks to do), including training kennels as well as tracks.” (Battersea Dogs and Cats home)
- “I'm undecided on whether a phased ban is the best way forward. My fear is that if you ban the sport it will continue to happen illegally and there will be no welfare provision for the dogs. Also, if there was a ban, I wonder would this mean the charities that rescue and rehome these dogs wouldn't get any funding as there wouldn't be as much call for them to exist. However, a lot of countries have banned racing and as a first world country why are we still entertaining these arcane traditions [with dogs] just bred to be exploited [...]” (Anonymous)
- “How animals are used in sport will vary widely but in all cases, this should be in an ethical way. In providing entertainment for humans, the welfare of the racing dogs must be paramount. There are similar situations with racing and performing equines where the ethical considerations will be the same. Any ban on racing dogs needs to be compared with sport where horses are involved. Any proposal for a ban should be based on evidence of benefit to animal welfare.” (Anonymous)

**There were some responses where question 5 was unanswered.**

Animal Welfare Network Wales (AWNW) and Companion Animal Welfare Group Wales (CAWGW) advise the Welsh Government on animal welfare issues and legislation. They are made up of several stakeholders, who failed to come to an



agreed response to Q4 & 5 and submitted their organisations' individual responses separately.

- “AWNW has a diverse membership with priorities that sometimes differ, we are unable to provide responses to the questions above as there is no consensus between our membership. AWNW has therefore encouraged its membership to submit individual responses to these questions so that the opinions and perspectives of all can be taken into account.” (AWNW)
- “CAWGW members do not have a unified view on greyhound racing as members will have different viewpoints. Members will respond individually to the consultation with their views. However, as an organisation, we acknowledge there are animal welfare concerns involved in the racing of dogs.” (CAWGW)

## **Question 6**

Question 6 was a mandatory question on the Welsh language, required in all Welsh Government consultations. Specifically, respondents were asked for their thoughts on the effects that any of these proposed changes would have on the Welsh language. In particular, it covered opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

There were 521 responses to this question.

76.19% of responses expressed the view that this question had little or no relevance to the consultation topic.

- “What has the Welsh language got to do with animal welfare?” (Maggie Thrussell)
- “Nid wy'n teimlo y bydd unrhyw un o'r newidiadau hyn yn cael effaith ar y Gymraeg. Nid yw busnesau preifat yn gorfod cydymffurfio â Safonau'r Gymraeg a gyflwynwyd yn Mesur y Gymraeg 2011 felly mae'n annhebygol bod nifer ohonynt yn cynnig gwasanaeth Cymraeg, neu'n darparu gwybodaeth ddwyieithog. Er y gallai mynnu trwydded olygu llai o sefydliadau neu busnesau, gan nad yw'r Gymraeg yn amlwg o fewn y maes hwn, ni fydd hynny yn cael effaith.” (Anonymous)
- “The existing legal requirements in relation to provision of communication in Welsh should already be complied with where necessary and any new proposals/developments as a result of this consultation should not add anything to those existing requirements, either positively or negatively.” (Gareth Walters)
- “I strongly disapprove of such a statement as I consider this totally unrelated to the subject matter. This subject matter has absolutely nothing to do with the Welsh or English language.” (Lester Dagge)
- “For goodness sake who care what language is used, primarily it should be about the animal's welfare.” (Sue James)
- “With regard to the questions of general animal welfare (licensing and strengthening existing rules), I cannot see that this is necessarily a Welsh language issue, although there are obviously requirements for Welsh language versions of the licensing policies and inspection procedures.” (Alison Harris)

13.05% of responses relayed potential positive impacts or ways in which the Welsh language should be incorporated into licensing considerations.

- “All documentation regarding these changes should be available in Welsh. This is the right thing to do to ensure that the Welsh language is treated favourably and I believe it would have a positive effect.” (Graham Wells)

- “The licencing and associated procedures should all be bilingual. There could be a provision within the licence stipulations that services provided, such as Doggy Day Care, are bilingual. Kennels etc should have bilingual signage and encouraged to have Welsh speakers on their staff. I can't think of any negative impacts, just opportunities for positive change.” (Anonymous)
- “Communication should be made in Welsh as well as English to maintain a feeling of inclusivity and a respect for tradition.” (Anonymous)
- “Cats Protection fully supports the use of the Welsh language. Providing individuals with the opportunity to use the Welsh language in a social prescribing context will further elevate the use of Welsh in Wales and hopefully, encourage more people to learn in the future.” (Cats Protection)

It was noted that 56 respondents did not respond to the question directly but continued with opinions on the consultation questions, the majority being about greyhound racing.

### **Question 7**

Question 7 was a mandatory question on the Welsh language, required in all Welsh Government consultations. Specifically, respondents were asked for their thoughts on how any proposed changes could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating it no less favourably than English.

There were 441 responses to this question.

70.52% of responses expressed the view that this question had little or no relevance to the consultation topic.

- “This is NOT a language issue. Animal welfare should be in the forefront.” (Judith Thomas)
- “I am a supporter of the Welsh language but I’m struggling to see the relevance here.” (Jonathan Wilson)
- “This should be something that should be decided by the individual. Enforcing the use of the Welsh language is wrong. Should an individual believe that they would like to learn the Welsh language then councils should make the ability to do so and for free so that it is available to all. More and more I am seeing discrimination against non Welsh speakers and the Welsh government seem to be the biggest culprit. Leave people to learn if they want to but trying to enforce it is wrong.” (Karen Roberts)
- “The focus of this should be upon the welfare of the animals and persons effected by any of the activities that are being considered for regulation. If positive effects are sought then this should be via the use of “plain” Welsh or English and should not be diluted by the use of legal gobbledeygook.” (Anonymous)

- “This is a difficult question because we are considering animal welfare, and the humane requirements to treat animals properly transcends language barriers.” (Alison Harris)
- “Any changes as a result of this consultation will already be subject to the existing Welsh language requirements.” (Battersea Dogs and Cats Home)
- “Seems irrelevant.” (Anonymous)
- “This has nothing to do with the Welsh language it's a direct attack on people with animals.” (Rosemary Williams)

20.4% of responses relayed ways in which the Welsh language should be considered.

- “Mae angen addysgu'r Cyhoedd beth bynnag ym mhob sefyllfa fod y Gymraeg a'i hawliau yn ei gwlad genedigol.” (Olwen Jones)
- “The more places Welsh people have to keep tradition alive. The more opportunities arise to speak Welsh.” (Anonymous)
- “Offering Bilingual information to all proposed changes in line with the current Welsh language policies.” (Jacqui Law)
- “Any consultation and/or future licensing/legislation should be readily available in English and Welsh.” (Yvie Bernett)

It was noted 40 responses did not respond to the question directly but continued with opinions on the consultation questions, the majority being about greyhound racing.

## **Question 8**

Question 8 functioned as an optional, free text question to close the consultation and give respondents the opportunity to provide final comments, elaborate on previous questions or raise anything further.

In total, 373 responses were recorded against this question. A number of these responses covered more than one theme, and the figures below therefore amount to a higher number than this total response figure.

Responses were analysed carefully and found to primarily relate to the following subject matters:

- 135 related to dog racing (including greyhounds).
- 102 related to licensing in general.
- 80 provided general comment, not applicable to any specific theme.
- 43 related to enforcement, including funding, resourcing and qualifications.
- 32 related to breeding, including breeders, dog breeding and cat breeding.
- 26 related to a specific welfare case, subject to ongoing court proceedings. (No further comment will be made in this summary as the investigation is ongoing and of a sensitive nature.)
- 13 related to animal welfare establishments (rescues, sanctuaries and rehoming activities etc.)
- 12 related to animal boarding and doggy day care.
- 11 related to equine activities, including livery yards, riding establishments and equine ID.
- 11 related to the Welsh language.

Other themes, with fewer than 10 related responses each, included:

- Dog licensing (7)
- Responsible dog ownership (6)
- Dog walking (6)
- Dog grooming (5)
- Canine fertility services (5)
- Consultation format (4)
- Fostering (2)
- Human-animal engagement services (2)
- Consultation definitions (2)
- Hunting (1)
- Pet abduction (1)
- Imports (1)
- Dove release at events (1)
- Licensing of activities involving animals 2021 guidance (1)
- Animal welfare offender database (1)
- Extreme conformations (1)
- Pet shop licensing (1)
- Horse racing (1)
- Pheasants and partridges bred for shooting (1)
- Animal exhibits (1)

Responses to Question 8 generally fell into four categories:

1. Short statement of assent or dissent (general or theme specific)

### ***Example***

- “Any legislation that safeguards animals and prosecutes those that harm animals is only positive.” (Anonymous)
  - “I believe the general public would be astonished to know the UK wasn't already regulating rescue & rehoming establishments.” (Jade Brooks)
  - “Make DOG GROOMING REGULATED.” (Vikki)
  - “Greyhound welfare is at its highest level since the sport started!” (Adie Smith-Pope)
  - “Pam ? Pam da chi isio gwneud bywyd i ni yn cefn gwlad mor anodd.” (Anonymous)
  - “Why are you wasting time and funds on this instead of going after genuine cruelty cases and illegal breeders.” (Rosemary Williams)
2. Supplementary response to a previous question (often Question 4 or 5) or overarching theme

**Example**

- “I don't agree with licensing rescues at all. Most are small operations/ charities and licensing would put a financial burden on them that could mean that they can no longer operate meaning less rescues are available for abandoned animals and places for people to be able to safely give up their animals when they have difficult circumstances.” (Sarah Spencer)
  - “Sufficient Government funding is essential for establishing and operating regulatory agencies responsible for licensing. This includes funding for staff salaries, training, equipment, facilities, and administrative expenses. Adequate government funding is essential to regulatory agencies have the resources needed to carry out their duties effectively...” (Anonymous)
3. Summary of their overall consultation response, repeating their answers for each point or reaffirming previous comments.
4. Submission on an area not elsewhere listed in the consultation

**Example**

- “A robust and digital equine ID system, including the recording of equine movements should be considered.” (The British Horse Society)
- “I believe owners should have licences to keep dogs.” (Nichola Hope)
- “We feel it is extremely important that the Welsh Government considers the limitations and loopholes in current legislation surrounding the breeding of companion animals. For example, the lack of current regulation to prevent the deliberate breeding of pets with health defects.” (PDSA)

## **Utilisation of Question 8 Submissions**

Responses to this question have been analysed both as standalone submissions to the question 8 prompt and within the context of previous questions. As with all questions in the consultation, responses received to question 8 will feed into our future next steps and we appreciate the varied views, information and evidence received here.

### **3. What Happens Next**

We intend to undertake a phased approach to the introduction of a national model for animal welfare.

We will focus our efforts on those areas which may benefit from regulation, taking account of the evidence, views and information submitted, and the particular issues arising from different types of activity, establishment or exhibit.

Working in partnership with our stakeholders, operational agencies, and third sector we will now move to the second stage of development of a national model. We recognise that several consultation responses provided extensive detail, going beyond establishing a need for regulation and evidencing any perceived benefits to setting out proposals for particular regulatory requirements, such as staff to animal ratios and inspection frequency. These, alongside all other responses, will be kept on record as we develop proposals further. Any new proposals will be subject to impact assessments, and we may consult further on specific matters.

A statement on the Welsh Government's next steps will be published in Spring 2025.



## Annex 1 – List of Organisations that Responded

Alliance Against Greyhound Racing	Greyhound Awareness Cork
Almost Home Dog Rescue	Greyhound Board of Great Britain (GBGB)
Animal Aid	Greyhound Rescue Wales (GRW)
Animal Welfare Network for Wales (AWNW)	Gwynedd Council
Battersea Dogs and Cats Home	Hope Rescue
Blue Cross	International Wildlife Consultants (UK) Ltd
Born Free Foundation	League Against Cruel Sports
British Dog Fields	Monmouthshire Council
British Horse Council	Monmouthshire Trading Standards
British Horseracing Authority (BVA)	Naturewatch Foundation
British Small Animal Veterinary Association	Neath Port Talbot Council Legal Regulatory Services
British Veterinary Association	Onekind
Brookpark Cattery	Ornamental Aquatic Trade Association
Caerphilly County Council	People's Dispensary for Sick Animals (PDSA)
Cariad Pet Therapy	Petitions Committee
Cats Protection	Racecourse Promotors Association Limited (RCPA)
Churches Together in Wales	Redwings
CLA Cymru	Rhondda Cynon Taf CBC
Communities for Horses	RSPCA Cymru
Companion Animal Sector Council (CASC)	South West Animal Protection
Companion Animal Welfare Group Wales (CAWWG)	Sports Information Services Ltd
Countryside Alliance	Swansea Council
Cut the Chase Coalition	The British Horse Society
Dogs Trust	The British Wildlife Rehabilitation Council (BWRC)
Entain PLC	The Greyhound Ambassadors
Farmers Union of Wales (FUW)	The Kennel Club
Female Falconers Club	Torfaen County Borough Council
Forever Hounds Trust	Universities Federation for Animal Welfare (UFAW)
Four Paws UK	Vale of Glamorgan Council
Freedom for Animals	Valley Greyhounds Ltd
Gower Bird Hospital	Veterinary Medicines Directorates
Grey2k USA	Wales Licensing Expert Panel
Greyhound Action Ireland	World Horse Welfare