

Explanatory Memorandum to

This Explanatory Memorandum has been prepared by the Office of the Chief Veterinary Officer and is laid before the National Assembly for Wales in conjunction with the above subordinate legislation and in accordance with:

Standing Order 27.1.

Minister's Declaration

In my view, this Explanatory Memorandum gives a fair and reasonable view of the expected impact of the Animal Welfare (Breeding of Dogs) (Wales) Regulations 2013. I am satisfied that the benefits outweigh any costs.

A handwritten signature in black ink, appearing to read 'Alun Davies', with a long horizontal flourish underneath.

Alun Davies AM
Minister for Natural Resources and Food

DATE: 12 June 2013

1. Description

There is a high level of public concern about the welfare of dogs and puppies in some breeding establishments in Wales. Research carried out under the Companion Animal Welfare Enhancement Scheme (CAWES) identified that there was an inconsistent approach to licensing by Local Authorities, as well as several gaps between the requirements of the Breeding of Dogs Act 1973 (as amended) and the Animal Welfare Act 2006. It was agreed, therefore, that updated legislation is required to ensure the welfare needs of the animals at these premises are suitably met. Consequently these Regulations provide requirements for local authorities to develop new licensing requirements for licensing dog breeding establishments.

2. Matters of special interest to the Constitutional and Legislative Affairs Committee

The draft Regulations are subject to approval of the National Assembly by affirmative resolution by virtue of section 61 of the Animal Welfare Act 2006 and section 162 of and paragraph 34 of Schedule 11 to the Government of Wales Act 2006.

The draft Regulations repeal section 1(1) of the Breeding of Dogs Act 1973 and make consequential amendments to 4 other Acts.

3. Legislative background

Section 13 of the Animal Welfare Act 2006 ("the Act") created the power for the National Assembly for Wales to repeal the Breeding of Dogs Act 1973 and replace it with new regulations in relation to Wales. Those powers now vest in the Welsh Ministers by operation of section 162 of and paragraph 30 of Schedule 11 to the Government of Wales Act 2006.

The power to make new Regulations must be exercised for the purpose of promoting the welfare of animals. Section 13 also requires that the Welsh Ministers consult with persons appearing to them to represent any interests concerned prior to exercising the power.

4. Purpose & intended effect of the legislation

The existing legislation for dog breeding is the Breeding of Dogs Act 1973 as amended; the requirements for licensing are based upon a breeder producing 5 or more litters per annum.

The existing Regulations were made 40 years ago and modern science suggests that greater animal welfare standards are required. Dog breeding establishments have come under intense scrutiny in recent years due to the increased number of high profile incidents where puppies were being bred in inappropriate conditions. Television programmes such as *Byd Ar Bedwar*, *The One Show*, *Week In Week Out* and *Rogue Traders* have all investigated allegedly unscrupulous breeders across Wales. Campaign groups such as *Puppy Love*, *Puppy Alert*, *CARIAD* and the *Advisory Council on the Welfare*

Issues of Dog Breeding have been set up to raise awareness of puppy breeding with the general public and put pressure on Governments. There has also been a strong veterinary input via the British Veterinary Association and others to the debate.

Research carried out under the Companion Animal Welfare Enhancement Scheme (CAWES) reported that, as of 31st March 2011, there were 251 licensed dog breeding establishments in Wales, along with 149 unlicensed premises and 1587 that were exempt from the current legislative requirements. The majority of these are based in the West Wales counties of Carmarthenshire, Pembrokeshire and Ceredigion.

The Animal Welfare Act 2006 came into force in Wales on 27th March 2007. The proposed Regulations are coming forward under Section 13 of that Act and the overarching policy objective is to improve the welfare standards within dog breeding establishments.

The main policy proposals within the new Regulations include:

- tighter licensing criteria;
- the requirement to microchip all dogs before they are 56 days old or leave the breeding premises, whichever is later;
- a staff: dog ratio which has a minimum staff requirement;
- standardising the minimum age a pup can leave the breeding premises;
- and
- the need for breeding establishments to introduce socialisation, and environmental enrichment and enhancement programmes.

In developing the above policy proposals, the Welsh Government has strived to find the right balance between introducing unnecessary or onerous requirements upon legitimate dog breeders while providing much needed provisions to protect the health and welfare of breeding bitches, stud dogs and their offspring and deter individuals from operating any illegal dog breeding activity.

5. Consultation

Details of consultations undertaken are included in the Regulatory Impact Assessment below.

PART 2 – REGULATORY IMPACT ASSESSMENT

Options

The main options considered were:

Option 1: No change.

Option 2: Licensing of all dog breeders in Wales.

Option 3: Licensing of all dog breeders in Wales that operate above a determined threshold.

Option 1

Evidence gathered through the Welsh Government's Companion Animal Welfare Enhancement Scheme (CAWES) suggested that updated legislation was required to govern dog breeding in Wales. In addition, ad hoc evidence has been received by the Welsh Government that would support this research. The general public feel strongly that stricter welfare requirements are needed and therefore, Option 1 is not viable.

Option 2

The Task and Finish Group on Dog Breeding initially considered the viability of introducing Regulations that would make anybody who bred just one litter eligible for licensing. However, this would have massive implications for enforcement officials who are already stretched, and could result in dog owners who have breeding bitches that are mated accidentally, requiring a licence. Whilst it would perhaps encourage owners that do not want a licence to neuter their animals neutered or employ better standards of husbandry, this was not seen as a realistic option due to the enforcement problems.

Option 3

It is therefore considered that the introduction of Regulations to impose licences on dog breeders that operate above a determined threshold was the only logical approach. This is consistent with the structure of the current legislation, the Breeding of Dogs Act 1973 (as amended), but stricter licensing requirements would meet the objective of raising welfare standards.

Costs & benefits

For Local Authorities, this should be a cost-neutral programme. Evidence was submitted as a case study by one local authority, Pembrokeshire, who stated that, whilst their licence fees were increasing in 2013/14, this was part of a planned 3-year increase and not as a result of the new Regulations.

Example 1

An example of how the legislation could affect breeders financially was submitted during the first consultation process. This is based on the proposal to introduce a minimum staff: dog ratio of 1 full-time worker per 20 dogs.

Welsh Association of Licensed Kennels (WALK)

Based on 20 dogs kept at premises:

2 stud dogs

2 young bitches (under 12 months - not whelping age)

16 breeding bitches, which will have 1 litter each per year (average 4 pups sold per bitch)

Sales (64 pups at £180 each)

Costs

Employment - £11,430

(37 hrs @ £5.92 min wage inc. an allowance for NI/Tax)¹

Vaccination of adult dogs - £300

(£15 each per annum)

Food for adults and puppies – £2,500

Bedding - £400

Vaccination of puppies - £640

Vet Bills - £1,000

(e.g. worming, fleas, caesareans, hernias etc.)

Overheads - £1,000

(e.g. electricity, water, fuel)

Total - £17,270

Loss (£5,750)

This does not take into account the following:-

Repair and Maintenance of kennels

Cost of replacement of bitches

Rates of Kennels

The costs involved with the proposed legislation regarding micro chipping.

How many people would work for the minimum wage of £5.92 per hour?

There could be a couple of retirement bitches in the total number

Example 2

A submission received in the second consultation² suggested that the 'income' figures cited in Example 1 were very conservative. A selection of prices charged for puppies on a typical Internet site, epupz.com, were provided. It demonstrated that average prices for commonly sold breeds were:

¹ This is at 2011 prices

² At 2012 prices

Breed	First 10 prices for puppies from a search on epupz.co.uk using breed name on 22nd May 2012	Average puppy price
Bichon Frise	£375, £550, £700, £500, £380, £450, £150, £375, £350, £350	£418
Cavalier King Charles Spaniel	£625, £695, £375, £600, £300, £600, £500, £550, £400, £600	£525
Boxer	£600, £650, £595, £500, £800, £800, £800, £350, £800, £650	£655
Springer Spaniel	£350, £500, £550, £300, £550, £400, £450, £450, £450, £150	£415
German Shepherd	£650, £650, £800, £400, £400, £450, £400, £550, £350, £800	£545

There will be a range of costs depending on what breeds are being sold, the latest “fashions” and demand for animals e.g. if based on the “epupz” web site the range of prices average out from £415 to £655 at the top end. It is noted that some dogs will cost considerably more e.g. British Bulldogs can vary from £1,500 to £4,000, mastiffs up to £1,800 and others considerably less.

However, it is recognised that the figures quoted in the epupz web site are selling direct to the consumer. A number of licenced breeders sell directly to other parties and the consequent sale costs are lower. But no figures have been produced from that sector. Consequently we can only stress that potential costs range from the example cited to a top end. It will be for individual breeders to decide how they want to profile their business activities.

Tightening the licensing criteria

The new Regulations, as currently drafted, tighten the licensing criteria currently set by the Breeding of Dogs Act 1973 (as amended). They require anybody who owns 3 or more breeding bitches and meets one or more of a list of criteria (breeds 3 or more litters per year, or advertises or supplies pups for sale from those premises, or supplies from those premises a puppy or puppies from three or more litters in a 12 month period, or advertises a business of selling puppies) to be licensed by their Local Authority. It is expected that this will result in an increase in the number of breeders eligible for licensing in Wales.

Data gathered under the Companion Animal Welfare Enhancement Scheme (CAWES) showed that at 31st March 2011, there were 251 licensed dog

breeders in Wales as well as 149 unlicensed and 1587 exempt (i.e. they do not meet the current licensing criteria).

Since the publication of the CAWES report, local authorities have been taking steps to ensure that all those breeders that should be licensed under the current regulations are indeed licensed. The only **additional** breeders that will require a licence under the new regulations are those with 3 or 4 breeding bitches. It is not currently known how many breeders fall into this category nor how they will react to the change in regulations (for example, they could reduce the number of breeding bitches they have or cease breeding altogether), however, the best estimate is that between 10 and 25% of the currently exempt breeders will need a licence from their local authority. Based on an estimated licence fee of £80 per annum, this suggests a cost to the industry of between £12,500 and £32,000 per annum.

Cost Impact	Benefit
Additional licence cost to breeder. A report produced by Pembrokeshire Local Authority in 2009 stated that licensing fees by Local Authorities in Wales varied from £56.50 to £305 per annum.	Greater enforcement power by Local Authorities. It is an offence to prevent a licensing officer from entering commercial premises for inspection purposes.
Requirement to microchip all dogs on premises and puppies prior to rehoming (cost benefit analysis below).	Reassurance for the public as the Local Authority would be able to handle any complaints/concerns and breeders would be inspected at least annually.
Requirement to improve standards to meet the new welfare conditions (cost benefit analysis below).	Breeders would have to meet certain standards to retain their breeding licence.

Improvements to Premises

The Breeding of Dogs Act 1973 (as amended) provides basic details on the construction and operation of dog breeding establishments. However there is a lack of clarity on the requirement in the 1973 Act. The new Regulations help to address this issue through the Welsh Ministers Guidance. It is important that all breeding establishments ensure they meet the “five needs” as set out in the Animal Welfare Act 2006. An animal’s needs shall be taken to include:

1. Its need for a suitable environment.
2. Its need for a suitable diet.
3. Its need to be able to exhibit normal behaviour patterns.
4. Any need it has to be housed with, or apart from other animals.
5. Its need to be protected from pain, suffering, injury and disease.

It is expected that in general a good dog breeder should already be complying with all those needs; therefore it is hoped that the new requirements should not impose a significant additional financial burden. However, those establishments shown not to meet the requirements will incur the cost associated with raising their standards. It has not been possible to produce an estimate of this cost based upon the available information.

Welsh Ministers Guidance has set out the minimum standards expected.

Cost Impact	Benefit
<p>Engagement with stakeholders from organisations that represent breeders are of the view that most registered breeders already operate to higher standards than those currently specified.</p> <p>It is recognised that poorer breeding establishments will have to upgrade their existing premises to comply, although as this could differ between such establishments it is impossible to determine.</p>	<p>Raising the minimum standard for breeding establishments will greatly enhance the conditions some breeding bitches are kept in.</p> <p>Improved health and well being of the resident dogs and puppies.</p> <p>Setting minimum standards will allow local authorities to take a more critical position of facilities provided and therefore improve conditions on the ground.</p>

Microchipping

As part of a wider intent, action is being taken forward to make microchipping compulsory for all animals in due course. The intent is that all dogs in Wales will need microchipping by the 1 March 2015.

In the meantime, there is no current requirement for breeding establishments to microchip any dogs kept on their premises, or any of the puppies that they sell. However, we are aware that many breeders already microchip pups prior to sale.

These draft Regulations will require a breeder to have all their animals microchipped either at 56 days or before they leave the premises, whichever is the later.

The purpose of microchipping puppies is to ensure an audit trail from the breeding establishment to the new owner. Should welfare or medical problems arise in the future which indicate that the source of the problem emanates from the breeding establishment/processes, it would be possible to establish that link and take the necessary action to ensure there is no future reoccurrence.

The Regulations also require that all dogs used for the purposes of breeding (both the sire and dam) will have to be microchipped. This will ensure an audit trail of how many litters the dam has had and the frequency along with details of age and ownership.

Cost Impact	Benefit
<p data-bbox="225 273 608 338">Additional cost to breeding establishments.</p> <p data-bbox="225 383 762 595">Microchipping could be undertaken in several ways – by a veterinary surgeon, by the breeders themselves if appropriately trained, or by another person/organisation offering an implanter service.</p> <p data-bbox="225 640 778 741">The approximate cost of microchipping by a veterinary surgeon varies but has been quoted from £10-£30 per dog.</p> <p data-bbox="225 786 767 999">If breeders choose to implant the microchips themselves, they would need to attend a training course and be certified. The one-off cost of training would be in the region of £70-£100.</p> <p data-bbox="225 1043 772 1290">A scanner and microchips would need to be purchased. A scanner retails from approximately £80-100 upwards. In respect of microchips it would be expected that breeders would purchase in bulk and that attracts discount. Prices do vary per supplier.</p> <p data-bbox="225 1335 416 1368">For example:</p> <p data-bbox="225 1413 767 1480">10 chips retail at approx £6-7 per chip including online registration</p> <p data-bbox="225 1525 767 1592">25 chips retail at approx £5-6 per chip including online registration</p> <p data-bbox="225 1637 735 1704">100 chips retail at approx £4-£5 per chip including online registration.</p> <p data-bbox="225 1749 778 1883">Dog breeding establishments have the recourse of reclaiming the cost of microchipping from a buyer when they sell a pup.</p>	<p data-bbox="809 273 1361 562">Microchipping is a way of achieving a relatively painless and permanent method of identification, unlike ID tags which can be removed. The microchip is very small and is injected with a needle. Discomfort should be momentary and is similar to a dog receiving a vaccination.</p> <p data-bbox="809 607 1342 819">It is a relatively inexpensive process. Most suppliers offer low-cost microchipping and, for a small outlay in respect of training and a scanner, any breeding establishment would be able to undertake this in-house.</p> <p data-bbox="809 864 1361 1043">Identification details can be easily updated. As the information is kept on a computer database, a simple notification is all that is required to update details of ownership.</p> <p data-bbox="809 1088 1342 1267">As a microchip is a permanent record that the dog belongs to a particular person, it is likely that this would be a disincentive to any one intending to steal a dog.</p> <p data-bbox="809 1312 1302 1413">Where a dog is lost, microchipping greatly increases the chances of it being returned to the owner.</p> <p data-bbox="809 1458 1361 1995">Unfortunately, some animals do get injured and die. When a vet or the council comes to retrieve or treat the pet they will check the microchip and be able to trace the owner and inform the owner of what has happened. Over half the animals found as strays are not returned to their owners. Many often having to be put to sleep. Consequently, a microchipped animal has a significant welfare benefit if it is able to be returned promptly. Kennels, even when properly run can create significant welfare disbenefits for a dog.</p>

	<p>The Minister for Natural Resources and Food made an announcement on the 26th April that he intended proceeding with the compulsory microchipping of all dogs will be required by the 1 March 2015, therefore breeders would not be at a disadvantage commercially to unlicensed breeders, who otherwise would not be required to microchip their animals. With these proposals animals coming from Wales will already be microchipped and initially will be a useful selling point.</p>
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Monitoring

There will be an additional cost to local authorities associated with monitoring the tighter licensing criteria, however, as noted above the impact on local authorities is expected to be cost neutral with the additional monitoring cost covered by the additional revenue from licences.,

Communications costs

There will be a cost to the Welsh Government associated with informing local authorities and dog breeders about the change in regulations. The cost of this is expected to be approximately £500.

Consultation

The first consultation on the draft Animal Welfare (Breeding of Dogs) (Wales) Regulations 2011 took place over 12 weeks between 21st October 2010 and 13th January 2011. The groups consulted were those that had an interest in the policy area and included:

- Other UK Administrations;
- All Welsh Local Authorities;
- Environment Agency;
- HMRC;
- Animal Health Veterinary Laboratories Agency;
- All member organisations of Animal Welfare Network Wales with a vested interest in the policy area;
- Wales Council for Voluntary Action;
- Representative bodies for veterinarians;
- Federation of Small Businesses;
- Police;
- Pet Industry Unions;

Ad hoc members of the public who had written to the Welsh Government about dog breeding and had asked to be kept informed of developments;
Welfare organisations;
The Kennel Club;
Agricultural organisations;
Countryside Council for Wales;
Animal Health & Welfare Strategy Steering Group;
All Party Group for Animal Welfare;
Hunt Committees; and
Members of the Task for Finish Review Group on Dog Breeding.

The consultation pack was also available to download from the Welsh Government website.

It was clear that there were a number of key areas of concern:

- Irresponsible breeding in so called “puppy farms” should be brought to an end;
- The welfare of all breeding dogs (stud dogs and bitches) and their offspring is paramount;
- Some of the criteria for being licensed was too narrow;
- There was strong support for microchipping to become compulsory, but there were issues that needed to be clarified.

Discussions have taken place with organisations that expressed an interest in meeting to discuss the concerns they raised during the consultation process. They were split into four groups, namely:

- Welfare campaigners;
- Countryside, working dog and Hunt sector;
- Licensed breeders; and
- Hobby breeders.

We have taken the outputs of the discussions and applied them against the existing proposed Regulations. It was clear that across the board there were a number of areas where we were asked to make changes to the proposed Regulations. Key changes sought were:

- The point at which a person become qualified to be licensed in terms of the number of breeding bitches and the number of litters;
- Anybody advertising or supplying dogs for sale and has more than four breeding bitches should be caught by the licensing regime;
- A specific exemption for hunt packs affiliated to the Council for Hunting Associations and the Masters of Draghounds and Bloodhounds Associations; and
- A tighter definition of ‘full time attendant’.

Major change

The inclusion of a staff: dog ratio was broadly accepted, however the ratio was changed from 1:20 to a minimum of 1:30 for the second consultation on the

basis that Local Authorities would be able to reduce this ratio if they believed that the licence applicant was unable to meet the standards required.

A second consultation took place in November 2012, with the same groups consulted as above, plus individuals who had expressed an interest in being contacted.

It was clear that the amended staff: dog ratio (1:30 instead of 1:20 for full-time workers, and 1:15 instead of 1:10 for part-time workers) was inappropriate.

Of the 137 consultation responses who actually answered the questions in the consultation, 78% did not agree with the change. Critically in addition to this the British Veterinary Association (BVA) and the British Small Animal Veterinary Association (BSAVA) have since revised their stance. Originally they set out a position of a ratio of 1:30 on this proposal, but after considerable internal discussion, their advice now reflects our original policy and recommends a ratio of no more than 20 dogs to one full time member of staff (or 10 dogs to one part time staff).

Other welfare experts and in particular the Advisory Council on the Welfare Issues of Dog Breeding (set up following the Bateson Report), calculated that it was impossible for one person to have control of 30 dogs and all their puppies and be able to satisfy reasonably the requirements laid out in the Animal Welfare Act and indeed the Welsh Government's Code of practice on dogs.

An example of time allocation was provided by a number of respondents based on the 1:30 staff: dog ratio. The figures were based on the interpretation of a full-time worker in the Regulations as 'a person who works at least 37 hours per week', split over 7 days a week. It was suggested that this would result in approx 5.5 hours for care each day, an average of approximately 11 minutes per dog per day (assuming continuous effort and totally undivided focus on the dogs).

However, the following was provided, based on conservative estimates reflecting a respondent's personal dog care experience in rescues:

Cleaning of kennel	(say) 15 minutes
Assume 3 dogs in kennel	min. 5 minutes per dog/day
Replacement of bedding material	min.3 minutes per dog/day
<i>(note, most 'volume' breeders use shredded paper or sawdust which would require changing daily)</i>	
Cleaning of individual food and water bowls	min. 2 minutes per dog/day
Food preparation and replacement of water bowls	min. 5 minutes per dog/day
Grooming (for required breeds)	weekly 15 minute grooming session - averaging min. 2 minutes per dog/day

Routine cleaning, feeding and grooming tasks are likely, then, to take a minimum of 17 minutes per dog per day, on the above conservative analysis.

Based on the above examples it suggests that a minimum staff/dog ratio of 1:30 does not allow time even for this to be done in a thorough way.

Minor changes

Some minor changes have been made on the Welsh Minister's Guidance following comments on the Consultation:

Adding the following sentence to the requirement for water in section 2.1:

“Where there is more than one dog in a kennel and there are no automatic drinking facilities, it is advisable to provide a number of drinking bowls and checked at least twice daily to ensure adequate access to fresh water at all times”.

Adding the following sentence about waste management: *“Licensee should check with Natural Resources Wales for current guidance on the appropriate means of disposal.”*

The addition of a Schedule containing a template for breeding bitch logbooks.

Competition Assessment

A competition filter can be found at Appendix A.

Post implementation review

It would be appropriate to consider starting a review of legislation three years after the legislation is made and brought into effect. There is at least one organisation which is seeking UKAS accreditation on breeding standards and it would be appropriate to consider that position in any review but after legislation has settled down.

APPENDIX A

The Competition Assessment

The competition filter test

The competition filter test is set out below, together with points raised

The competition filter test	
Question	Answer yes or no
Q1: In the market(s) affected by the new regulation, does any firm have more than 10% market share?	No
Q2: In the market(s) affected by the new regulation, does any firm have more than 20% market share?	No
Q3: In the market(s) affected by the new regulation, do the largest three firms together have at least 50% market share?	No
Q4: Would the costs of the regulation affect some firms substantially more than others?	Yes
Q5: Is the regulation likely to affect the market structure, changing the number or size of businesses/organisation?	Yes
Q6: Would the regulation lead to higher set-up costs for new or potential suppliers that existing suppliers do not have to meet?	No
Q7: Would the regulation lead to higher ongoing costs for new or potential suppliers that existing suppliers do not have to meet?	No
Q8: Is the sector characterised by rapid technological change?	No
Q9: Would the regulation restrict the ability of suppliers to choose the price, quality, range or location of their products?	No

Questions 1 to 3: the market

No one firm will have at least 10% of the market. At the last Companion Animal Welfare Assessment in March 2011 there were some 251 licensed premises in Wales and 1587 premises which breed animals but which are not under current Regulations eligible to be licensed.

Question 4: substantially different effect on businesses/organisation

All businesses should already be complying with the Animal Welfare Act (the Act) and the duty of care; however we are aware that some businesses are not

meeting the current standard of welfare of the Act. All businesses should have met the duty of care requirements of the Act, which sets up framework provisions. These Regulations provide for the detail to ensure animal welfare standards are not compromised. We have had no figures supplied to us from the industry on potential infrastructure changes that might be needed, despite two consultations and meeting with them. Some local authorities have been in discussion with licensed breeders since February on potential changes that might occur.

Question 5: changes to market structure

A yes answer is given but that is by no means a certainty. If these regulations penalise certain firms it is because the welfare of the animals may have become compromised and investment is needed to ensure an animal's welfare is not compromised. This could result in some businesses ceasing to trade. But from the figures that have been supplied, it is clear a different business strategy produces far higher returns.

A by-product of these Regulations could also be an increase in activity in the Microchipping sector. As demand grows, so more individuals and businesses may choose to train to become implanters to provide this required service.

Questions 6 and 7: penalising new suppliers

There will be a delay of some three months to allow local authorities and licensed breeders to consider these Regulations further. However, after commencement the new standards will be applied at the next licensing for new premises. If a premises is due to be renewed the day following implementation the local authority must issue a licence if they comply or if they believe they will comply. Likewise premises whose licensing is not due, for example, until 9 months time will not be affected until then. New applications should be in a position to comply at the beginning of their licensing cycle regardless of when that is.

Question 8: technological change

A no answer is given. Change of animal welfare standards can take some time to evolve through research and development.

Question 9: restrictions on suppliers

Whilst we do not agree that the proposals will restrict breeders, it is possible that new standards may cause existing prices to rise. The Welsh Association of Licensed Kennels argue that the traceability of puppies to Wales, because of its reputation as 'the puppy farming capital of the UK', may deter potential buyers. However, if positive marketing is undertaken there will be an indication that Welsh breeders will be working to higher standards than are required in other parts of the UK. Responsible licensed breeders in our discussions welcomed this positively.

