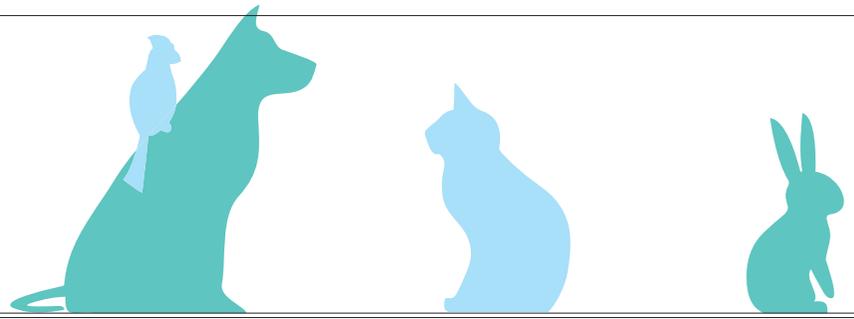
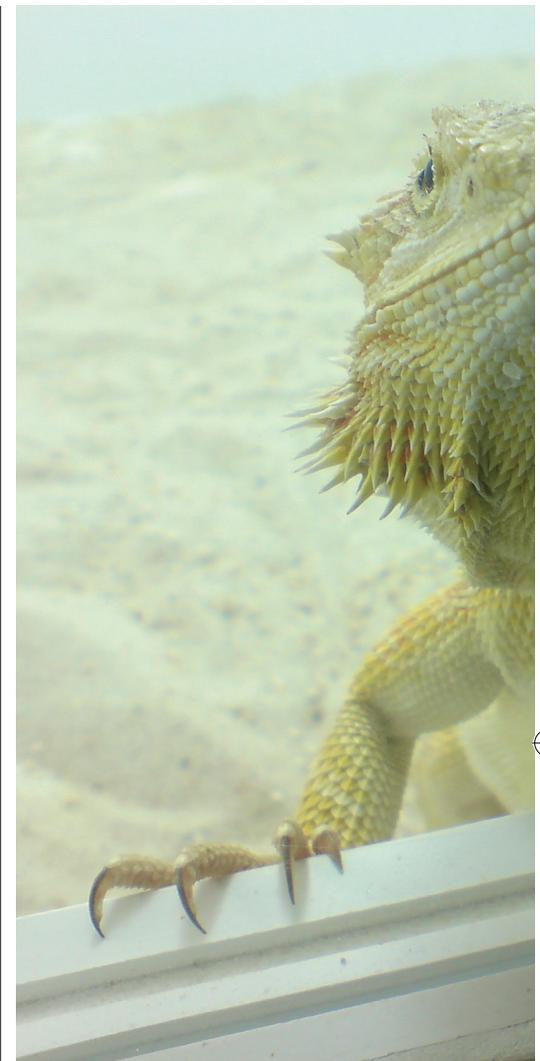


# Practice



# Creatures great and small

A comprehensive new regime for local authorities covering their animal-related duties came into effect last month. **Clifford Warwick** explains the background



Inspecting animal establishments, such as pet stores, wholesalers, boarders and breeders, presents an array of regulatory obligations and challenges for local authorities. They must juggle a raft of real-world tasks with the letter and spirit of a law that aims to be all things to most animals.

Getting reliable, objective and pragmatic guidance has been as much a challenge for inspectors as dealing with the diversity of thousands of species that are kept as domestic pets or exhibited and bought and sold.

Two major pieces of guidance are now in circulation that may aid confidence for local authority inspections. In June, the scientific guidance, *Guidelines for Inspection*

of Companion and Commercial Animal Establishments, was published in a leading veterinary journal, and in July, Defra published the UK government's own guidance, *The Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018 Guidance Notes For Conditions*, as part of secondary legislation to the Animal Welfare Act 2006. Both were distributed to UK local authorities, the scientific guidance internationally.

Modernising and raising standards of animal welfare is inherent to the ethos of the Animal Welfare Act. After suitable acclimatisation, local authorities and their inspectors may feel that with these two new sets of guidance, they have all the tools required to oversee the management of animal establishments, as well as possess the support necessary to satisfy legal obligations, public perception and the fundamental protection of animals in their area.

But for the recent guidance to be meaningful, it is important to set the bar high for those animals living behind bars, wire and glass, and also for the public who increasingly demand conscientious inspection on their behalf.

The scientific guidance, which is already in



**'It is important to set the bar high for those animals living behind bars, wire and glass'**

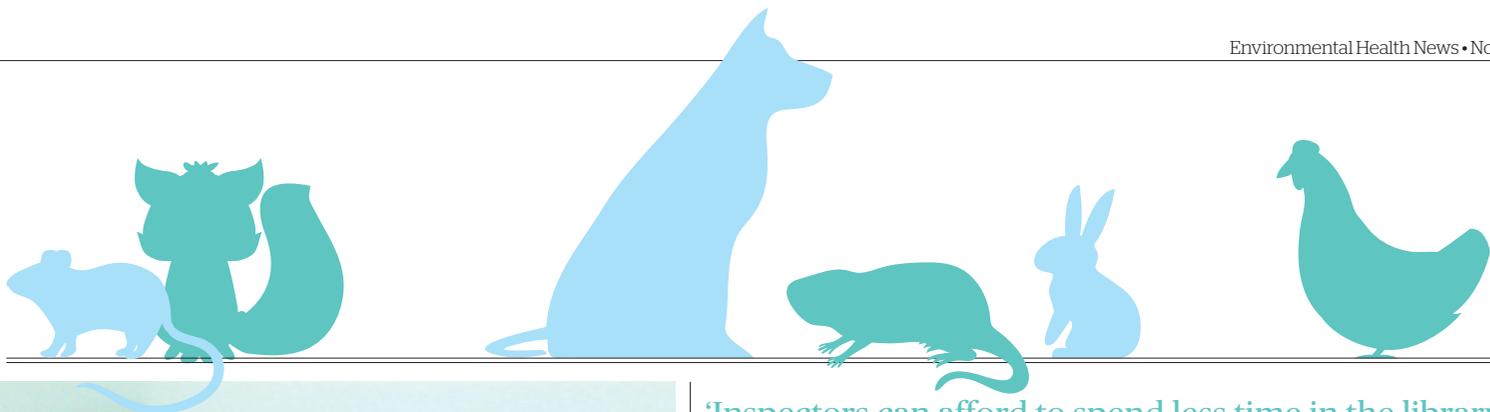
circulation in more than 20 countries, has appeared following six years of extensive research and development by an international team of 15 leading scientists and veterinarians, employing an evidence base of more than 100 peer-reviewed scientific reports. It is written by inspectors and animal managers, for inspectors and animal managers.

The document was designed to be a comprehensive and definitive source of relevant information – an international gold standard. It aims to combine scientific robustness with practical simplicity. It provides consistent, easy-to-use methods covering all species and all facilities. There are more than 40 sections, with 14 information tables addressing good or poor welfare indicators, including temperature, humidity, lighting, substrates, day and night cycles, noise, and zoonoses, plus a tool for scoring conditions – pretty much everything inspectors need.

A major challenge for inspectors is assessing space for animals, so it's worth singling this subject for attention.

Enough space is always needed





## 'Inspectors can afford to spend less time in the library and more time setting defensible standards'

to allow animals to behave as naturally as possible, including the ability to roam, climb, fly, swim, burrow and so on, and most certainly to an extent consistent with good welfare.

Enough space is also needed to easily and safely accommodate all the life-supporting essentials such as thermal gradients, basking zones, air exchange, shelters, heat lamps, humidifiers, water pools, substrates, furnishings, enrichments and other paraphernalia. Certain species, including many small mammals require some of these features, whereas others, such as reptiles, require all of them. But what's 'enough space'?

**H**istorically, assessing 'space' has been difficult, with what's out there being mostly a mishmash of scientifically and practically incoherent variants. The scientific guidance provides an easy, species-universal algorithm to guide inspectors on enclosure size and overcrowding issues:

- 1 Enclosure length (and height for arboreal species):** visualise the animal coiled like a ball; 'draw' an imaginary line across its diameter; then multiply its diameter by 10. So an animal with a body-size diameter of 15cm requires a 150cm long enclosure.
- 2 Absolute minimum enclosure size:** 100cm, for their primary dimension.
- 3 Stocking density:** all animals must be able to use any facilities or furnishings (such as water bowls, bathing pools, perches, hides and basking sites) at any one time.
- 4 Additional exercise areas:** some species require these.

It's minimum effort for maximum results – who could ask for better!

Another challenge is finding good information on the temperatures, lighting and humidity required for the huge diversity of species in trade and keeping. On this, the scientific guidance uses world climate zones and habitat types to determine 'safety net' regimes for all animals, so whether it's a snake from a tropical rainforest or a tortoise from the Mediterranean, the facts and figures for essential care are only a glance away.

Consistent and objective inspections are important for local authority and public confidence. So, the scientific guidelines contain a straightforward scoring system directly linked to its guidance criteria. This enables inspectors to award a score of 0 (poor/failed), 1 (adequate), 2 (good) or 3 (exemplary). Evaluations no longer need to be made up on the spot!

The government's new guidance, prepared by Defra, provides some conditions for layout, record-keeping and other information on environmental inspection and management that inspectors will likely welcome.

The document contains 250 pages of 'conditions and guidance' and three tiers of welfare standards: principles, minimum and higher minimum. However, much of this information is repeated in different sections. For 'on the hoof' inspectors, it would be a lot to memorise or haul around animal centres. Nevertheless, Defra's general 'shop floor management' messages, from cleaning to keeping records, are long overdue and broadly supported by the new scientific guidelines mentioned earlier.

The main difference between the scientific guidelines and Defra's guidance is that the latter was formulated by a stakeholder committee rather than objective biological science and accepted animal welfare provisions. Thus, it lacks scientific detail and a discernible evidence-base. Of course, an inspector can always cross-check advice with the scientific guidelines for verification.

The UK government recognises the need for guidance to be 'live' and refinable – providing opportunities to modernise information and enhance relevance, even at short notice – and also acknowledges its limits. Accordingly, Defra encourages local authorities to obtain extra information from expert sources such as expert veterinarians and scientific materials, of which the new scientific guidelines provide the most relevant complementary item.

So, between the scientific guidelines and Defra's own, inspectors can afford to spend less time in the library and more time setting defensible standards.

Understandably, to assimilate the government's new guidance, local authorities may opt for specific inspector training. But be careful. The Animal Protection Agency cautions that the new inspection obligations may lead opportunists to seek either to cash in on or even shape inspection procedures for vested interests.

To avoid unreliable information, loss of public confidence, legal challenges and associated increased administrative burdens, authorities should make sure that any courses are delivered by professional inspectors who are properly qualified and experienced and possess entirely objective (ideally veterinary) backgrounds. **E Clifford Warwick is a biologist and medical scientist. He is the author of more than 150 articles and books on animal biology and human medicine, and was team leader for the Guidelines for Inspection of Companion and Commercial Animal Establishments**

## New animal duties

A new licensing regime for those involved in certain activities involving animals came into effect across England on 1 October.

The regime will be administered and enforced by local councils, and covers anybody carrying out a business involving one or more of the following licensable activities:

- Selling animals as pets.
- Providing or arranging boarding for cats or dogs.
- Hiring out horses.
- Breeding dogs.
- Keeping or training animals for exhibition.

It was introduced under The Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018, which have been made under Section 13 of the Animal Welfare Act 2006.

**Legislation and guidance**  
[tinyurl.com/ybbskpa2](http://tinyurl.com/ybbskpa2)

**Animal Welfare Act 2006**  
[tinyurl.com/y9usalsd](http://tinyurl.com/y9usalsd)