

**From:** Stringers Farm  
**Sent:** 14 March 2019 19:19  
**To:** Regulatory Services  
**Subject:** Animal Licensing Policy Consultation

Dear Sir or Madam,

The animal licensing requirements are mainly given by national laws, but the licensing fees set by Guildford Borough Council are multiple times higher than in other Boroughs.

(Please, compare Doncaster as 1 example:

<http://www.doncaster.gov.uk/services/business-investment/animal-licensing>)

This will unproportionally affect small businesses and a lot of positive activities will not be provided in Guildford in the future!

As example, if our small farm would like to offer animal encounters for the local nursery (in the past offered for free), we would have to pay around 400 £ for a licence (nearly 5-times the amount due in Doncaster). This is of course not sustainable and these activities cannot be offered in the future anymore!

Please, might you reconsider your licensing scheme, especially with regards to small businesses.

Thank you and kind regards  
Ralf Hartung

From: joanna quinlan  
Sent: 14 March 2019 15:58  
To: Regulatory Services  
Subject: Animal licensing policy consultation.

To whom it may concern,  
please consider my additional concerns to those already raised by the Cattery during your meeting regarding the matter.

Whilst I appreciate the new licensing conditions are to try to improve animal establishments and to allow councils to better regulate them I feel as a existing business with an outstanding reputation (providing excellent care for dogs myself for the past 12 years and previously run for decades before that for which some of I worked for with a equally good reputation) the licensing regulations are somewhat prejudice in that it is impossible for me to obtain a higher star rating than 5 without for example knocking down the existing kennels and rebuilding them to a slightly larger size. For one thing I do not believe that doing so would enhance the welfare for my boarders (and I would welcome proof that this would be the case) and the cost for doing so including loss of earnings whilst building I would never make back in my working life even if I was 21 and not 37 years old.

The star rating seems complete nonsense in any case in that as a low risk establishment I am only able to obtain 1, 3 or 5 stars, where as a high risk establishment could obtain 2 or 4 stars. This scoring system just does not make sense and is misleading to potential customers.

I am also concerned about the consistency of the scoring throughout the UK. I have been assured by the dog warden that regular meeting with some of the other local district councils have been in place to try to ensure their consistency however due to our current excellent reputation our customers travel from all over the including central london, Hampshire, Berkshire. There are so many near by boroughs that it is very important for us to know that everybody is marked fairly so that potential customers are not put off for unfair reasons.

kind regards  
Joanna Young  
Five Acres Kennels

From, Five Acres Village Cattery Ltd  
13/03/2019

### **Animal Licensing Policy Consultation Team**

The new regulations introduced as of 1st October 2018 attempted to create a single standard nationwide animal licensing framework to cover not only Catteries and Kennels but also home boarding, Zoo's and Circuses.

The final regulations were only made available to the local licensing councils. Guildford Borough Council did not then pass on to relevant local businesses until mid-November 2018! Given that the regulations came into effect as of 1st October 2018 and our licenses expire on 31<sup>st</sup> December each year, this put an enormous load on all effected.

Five Acres Village Cattery has always prided itself on improving standards for the welfare of the cats in our care and the service and support given to our clients.

While we support the general intentions of the new regulations there are a number of flaws with the regulations that are not in the interests of the cats in our care, are not what our clients desire, some which are discriminatory in our view and other that we believe to be illegal.

We have raised all these concerns to the licensing officer of GBC, who whilst sympathetic, is powerless to vary from the Defra guidelines.

Defra have knowingly introduced legislation that is prejudice against any existing cattery built to previous regulations and industry standards. It is not reasonable or practical and in some areas such as the larger pen sizes possible to meet these higher standards. Defra have not provided any alternative means to allow existing facilities to achieve a 5 star rating. It is therefore discriminatory against any person that owns a cattery built to these previously accepted standards and requirements. We believe this to be illegal and this means that GBC as a council are being asked to implement on an illegal basis. This predefined exclusion of our facilities may have a financial detrimental effect on our daily business and the future sale of our business. There are simple, viable and effective best practices to achieve the same results as described below which we believe should be included as an alternative.

We will be writing to the "Head of" the relevant Defra division (as there is no document owner) for these areas to be addressed immediately - we would at least expect them to be reviewed at the next scheduled review but there is no "document review date" which is strange as all our policies and procedures must be reviewed annually as is typical in any ISO type implementation.

### **License Charges & general comments**

Historically since licenses have been issued, more then one name has been allowed on them, thus allowing for the running of two separate businesses at the same address, ie; Cattery & Kennels, as is the situation with ourselves.

It is somewhat surprising to no longer allow this established practise and we feel that there could be a legal precedent for it to continue as names on the license in no way affects the welfare of the animals. Surely this is supposedly what this legislation is all about?

As to the cost; our joint £100 licence now costs ten times more, just under £1000 for both. Inflation or what ???

There is also no key for the license checklist so it is meaningless to the uninitiated.

### **5 Star Rating System**

The introduction of the new 5 Star-rating system is intended to give potential new clients a clear indication of the quality of the Cattery in question.

Five Acres Village Cattery has not advertised for 5 years + and even before that we only advertised in the local parish news to support the local publication.

We rely purely on our reputation and the recommendation of our existing clients and Veterinary practices who recommend us. As our regular clients know too well, we are booked up very early and already taking bookings into 2020.

The 5 star rating under the new system is only available to Catteries that meet all the minimum standards and ALL the higher standards.

Five Acres Village Cattery achieves all minimum standards and all but two of the higher standards and has been given a one star rating.

It is impossible for us to achieve the 5 star rating without major structural changes to the cattery which are not viable physically, let alone cost effective, are also not in the best interest of the cats and are not what our clients wish us to make.

We understand that there is also no option ever to progress from 1 star to a 3 or 5 star - a 4 star rating is only for a 5 star Cattery at high risk of failing?? - Go figure. This is against any other star rating system used in any other relevant sector such as food hygiene or hotel accommodation and as such is fundamentally flawed making the star rating system invalid.

The 5 Star rating does not in any way look at the customer service levels, customer policies and operating practices a Cattery gives its clients.

It is clear that the star rating is not a fair representation of the quality of care given to the cats boarded with us or the customer service levels we give and below is further detailed explanation of the two requirements we "fail" on for you to make an informed judgement yourselves.

### **Higher Standard 1 not achieved**

"Units must be 1.5 times the minimum sizes stated."

All our pens met or exceeded the existing size requirements prior to 1st October 2018, and without major reduction in the number of cats boarded - which is not

economically viable or undertaking major structural changes - which is not reasonable or practical; it is impossible for us to meet this requirement.

The Higher standard for accommodation is purely arbitrary, why not 1.4 times or 1.6 times?

There is no scientific evidence provided to show that not having more space is detrimental or more space is beneficial to the cats and as such is invalid as a higher standard requirement.

It also fails to understand that we operate on a best practice basis that all our borders are given the largest space available.

We believe that our best practice approach is what Defra should be working with, as this can easily be included in Policies and Procedures.

### **Higher Standard 2 not achieved**

"There must be completely opaque sneeze barriers rather than translucent up to 600mm and behind any shelves."

The Higher standard for Opaque screens is again not defined correctly and is invalid as a higher standard requirement.

Opaque means "not transparent or translucent".

The guidance by Defra suggest that "full height full width translucent sneeze barriers" which should "be at a minimum translucent (allowing light to pass through, but only diffusely so that objects on the other side cannot be clearly distinguished) to reduce stress caused by cats seeing one another"?? - Which is it Defra - Opaque or Translucent?

Assuming they mean translucent (they will no doubt correct this at the next review... oh yes there is not one scheduled), there is no specification given as to the amount of light permitted or not permitted. An ECDC inspector has not been given means or equipment to test this properly either and therefore cannot properly make this assessment so have been told to use their judgement - hmmn how does that fit with a national standard?

This is not a reasonable or practical requirement on a cost basis alone but it would have been impossible for us to implement in the time frame given.

Seriously though this is the one area that we will not change in our Cattery to just to get more stars.

A major part of the new legislation is there to ensure the welfare and well being of the cats - a good thing and has always been our highest priority here.

To comply with this requirement would darken the pens, which is detrimental to the cats well being (Section 5.2 (e) of the Defra regulation) as well as other issues as below, and undesirable from all the clients we have canvassed.

Having opaque screens precludes any interaction between cats, which is contrary to Sections 7.0, 7.1 and 7.2 of the Defra regulations as cats in general are social creatures.

Many cats whilst boarding like to interact and play with the other neighbouring cats, this would be impossible with opaque panels.

When a new cat comes to the Cattery for the first stay we always try and place them to cats that have been before so that the new boarder can see that the other cats are happy and relaxed and also to watch and learn the new routine.

Where a cat is not sociable simple and effective best practice measures such as temporary screens are put in place. Again these best practice measures can easily be included in Policy and Procedures.

It is part and parcel of what we do to know your cat and the specific requirements of each and every cat - this is not something you can get a qualification in or document in a procedure.

We believe that this is an ill-conceived part of the legislation, poorly implemented and fundamentally not in the best interest of the majority of cats and should be removed.

### **Summary**

It is more than frustrating that a faceless government body who clearly do not understand that running a Cattery is a life style business and not a corporate "maximise profits at every turn" business has created this mess that they are now trying to distance themselves from.

Corporate processes of policies and procedures and ISO type documentation are not appropriate for this kind and size of business.

It is clear to us that Defra have a flawed understanding of what we do, the real world requirements of what the cats boarded require, and what our clients want and wish for.

Yes we do find it insulting and it makes us angry as we have worked extremely hard over the past 6 years to create our reputation that this rating system does not in any way fairly reflect.

There was nothing in the new regulations that we were not already doing and all we have had to do is extra paperwork to update our policies and improve our audit trails. We are fortunate that we have the knowledge, experience and skills to have been able to implement these new regulations but other Catteries have closed or are planning to sell up as a direct result of these new regulations.

Yours sincerely

Danny & Sue Page BSc (Hons)  
( *Directors & Owners* )

**From:** Emma Tipton  
**Sent:** 13 March 2019 16:10  
**To:** Regulatory Services  
**Cc:** Vicki Betton  
**Subject:** FW: Guildford Borough Council - Animal Licensing Policy Consultation [UNC]

Hello,

Thank you for letting us know about this important consultation.

Here are our thoughts (below). If you need any more information or if any of our comments aren't clear please do get in touch.

This new piece of legislation should result in some great improvements in the welfare of pets so it is brilliant to see that you are taking measures to make sure that it beds in well in your area.

Kind regards

Emma  
**Emma Tipton BSc BVSc CertIAWEL MRCVS**  
Evidence and Policy Manager



Paragraph 5.6

Also add in those related to fraud, smuggling, tax evasion, domestic violence offences or any offenses relating to abuse of a minor.

Re domestic violence and abuse of a minor, we work as part of the Links Group on this topic:

[www.thelinksgroup.org.uk/](http://www.thelinksgroup.org.uk/)

Paragraph 8.3

Also add that a new applicant will automatically be considered as high risk. See paragraph 11 in Defra's Procedural guidance notes for local authorities.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/762430/animal-welfare-licensing-procedural-guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/762430/animal-welfare-licensing-procedural-guidance.pdf)

Paragraph 11.5

Disqualified from keeping animals? Is it as per point 18.6 below?

Paragraph 13.4

For consistency should 'operator' be replaced with 'license holder' throughout this document? Or each term defined if they are different?

Paragraph 14.2

And there is no impact on the welfare of any animal in their charge ??

**From:** Greenways Stables  
**Sent:** 01 February 2019 17:45  
**To:** Licensing Unit  
**Subject:** Draft Animal Licensing Policy

I have read through the above and as a proprietor of a busy riding school in the borough, overall, I think it is a good idea.

However, I have 3 concerns/ queries:

1. As part of our Pony Club approval and work with local schools, both members of staff at the stables have DBS certificates already. To have to provide another one for the purpose of licensing within 3 months of the date of application seems quite costly and timely to do. If establishments do not have them already then I completely agree they should be done but for those of us who have paid for DBS checks within the last year, to do another one seems unfair (as I assume the cost will be at our own expense)
2. I am unclear as to how you decide on who is appropriate/ qualified to be an "Inspector"- surely they should be industry experts (as the appointed vets are), not just someone with the right piece of paper?
3. When will the new inspection procedure actually come into effect? I am assuming if there's no meeting until May, then this won't be until at least 2020. In the meantime, does an inspection remain the same as it has been up until now?

These are my responses to the Draft Policy and I hope that they are taken into consideration.

Best regards,  
Sally Blackmore.



**From:** Rachel Williams  
**Sent:** 04 January 2019 11:38  
**To:** Licensing Unit  
**Subject:** Draft licensing policy feedback

Hello,

One of our local branches has alerted me to the consultation on your new draft licensing policy and I wanted to send you some feedback.

Overall, the policy is excellent: strong, concise and user friendly for both those applying for licenses and staff using the policy. From an animal welfare/protection perspective there's nothing missing. The only suggestion I would make would be to include your processes for investigating and acting on complaints from the public in it more explicitly, perhaps in the latter sections on enforcement.

Once the policy is agreed and in force, I would strongly encourage you to apply for one of our PawPrints Awards (which recognise local authorities who are delivering best practice in animal welfare provision). The policy as it is currently drafted would certainly be eligible for recognition in our licensing category. There's more about the awards online [here](#), though of course the criteria for licensing will be reviewed quite significantly this year to reflect the new realities of the 2018 Regulations.

Best wishes,  
Rachel

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Rachel Williams  
Senior Parliamentary Advisor  
RSPCA