

Services in small animal behavioural medicine

Hon Tommy Cheung
Chairman
Subcommittee on Public Health (Animals and Birds) (Animal
Traders) (Amendment) Regulation 2016 and Specification of Public
Offices (Amendment) Notice 2016
Legislative Council
Hong Kong

8th June, 2016

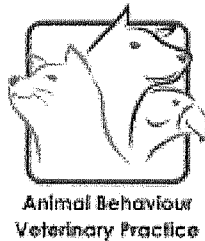
Dear Mr. Cheung,

**Re: "Amendment to CAP 139B Public Health (Animals and Birds)
(Animal Traders)"**

With the rapid growth of animal trading activities, enhanced and better regulation of the breeding and trading of dogs is to be hugely welcomed in order to ensure and improve the health and welfare of animals kept for breeding purposes.

For far too long there has been no licensing requirement for people who sell animals or even their own pets or their offspring. This loophole has been exploited by commercial breeders who operate under the guise of private pet owners. They have been able to operate without having to comply with any licensing conditions related to the animals' welfare including standard of housing, hygiene and the health condition of the animals being bred.

I was disturbed to read that between Feb 2010 and July 2011, 74% of the 11542 dogs sold in licensed pet shops were sourced locally from so called private pet owners (PPO's) and that the 16 major pet traders who accounted for almost half of all the dogs sold in HK, sourced over 90% of their dogs from PPO's. These numbers strongly suggest that the people supplying these dogs are not hobby breeders but people breeding dogs for commercial purposes. Sadly, investigations also revealed that the welfare conditions of dogs kept on the premises of some of these PPO's were unsatisfactory.



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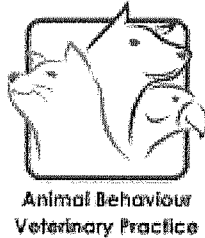
These figures and the potential welfare implications in allowing the loophole currently being exploited by unlicensed operators to remain unplugged, only serves to underline the necessity of requiring anyone who sells dogs, including their own or their pets' puppies to be licensed irrespective of the number of dogs involved or whether the dog is the person's own dog or its offspring.

It is understandable and desirable that much of the focus on improved regulations will have been on ensuring that breeders comply with certain acceptable standards of welfare including space, ventilation, lighting, disease control, feeding and watering and hygiene to ensure the animals' physical wellbeing. However as a veterinary behaviourist I am very happy to see that in the proposal, breeders will also be required to meet the behavioural needs of the dogs by providing adequate environmental enrichment and mental stimulation in the form of toys, exercise, and positive interactions with people as well as with other dogs and recognising the need for puppies to be adequately socialised.

Unfortunately I see many many dogs in Hong Kong that develop serious behaviour problems because of inadequate socialisation and aversive early learning experiences as puppies.

It has been shown that the more puppies are socialised and given positive experiences with new situations and novel things, they are much less likely to develop the fears and anxieties that often lead to behaviour problems later on. However we also know that timing is critical and that there is only a very small window of opportunity for puppies to be adequately socialised. The most sensitive period occurs between 4 and 12 weeks of age and it seems that whatever a puppy learns during this period, builds the foundation for their likes, dislikes, fears and anxieties.

Puppies are often not sold on to an owner by the breeder (or by a pet shop) until they are around twelve weeks or even older which is well past the optimum socialisation period. This makes it all the more important that a breeder ensures that puppies in his care are provided with the right kind of



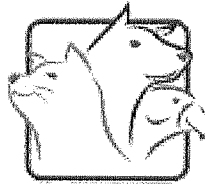
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socialisation experiences during this critical period. If this very important part of the puppy's development is neglected, it is likely to develop fear and anxiety around the things it will encounter in the domestic environment including unfamiliar people. Fear and anxiety may result in aggressive behaviour which may pose a later risk to the public.

Socialisation experiences ideally include:-

1. Meeting a variety of people. This includes men, women, babies, children and teenagers. Also the elderly and delivery people.
2. People with varying appearances. This includes people with glasses, beards, carrying umbrellas or sticks, wearing backpacks or carrying large items, wheeling suitcases or trolleys and wearing different clothing such as uniforms.
3. People on various types of transport. This includes people running, on a bicycle or skateboard, pushing a pram or a wheelchair.
4. Introduction to a variety of environments. This includes other people's homes, built-up areas where it will encounter traffic including large motor vehicles such as trucks and buses; busy urban areas with groups of people on narrow pavements; in a lift; a restaurant, the park or the playground.
5. Introduction to novel items. These include pushchairs, prams, bicycles, vacuum cleaners, washing machines or hairdryers, dolls and squeaky toys.
6. Introduction to a variety of novel sounds. These include fireworks, thunderstorms, traffic, crying babies and noisy children playing.
7. Introduction to a variety of experiences. These include grooming, having its nails clipped, handling, being taken out for a walk, travelling in a car or taxi and a visit to the vet to say a friendly hello.
8. Meeting other dogs. Giving the puppy the opportunity to meet other well socialised dogs in a safe environment both on and off the leash.

Whilst it is unrealistic to expect that a breeder will be able to fulfill all of these, socialisation experiences are much more likely to be provided by breeders who have a small number of dogs being kept in a normal domestic environment and where family members and friends can interact positively with the puppies. It is also more likely that the people caring for the dogs have the time to introduce the puppies to at least some of the experiences



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recommended and help them feel relaxed and confident in all sorts of situations and to like everyone they meet.

Whilst it seems that even a small amount of experience will have a significant effect on a puppy's later behaviour it is unlikely that large scale commercial breeders who mass produce puppies that are kept in factory-like conditions in small cages, will be able to provide even the minimum amount of socialisation required to ensure the mental and physical health of the puppies they produce. We should therefore be encouraging individual breeders where small numbers of dogs are kept in communal living areas, where there is a good carer to dog ratio, where the welfare of the dogs is paramount and where the physical and mental health of individual animals can be protected and their welfare monitored by the application of appropriate licensing conditions.

In conclusion I, like all of those genuinely concerned for the welfare of dogs being kept for the purposes of breeding, fully support the amendments to CAP 139B Public Health (Animals and Birds) (Animal Traders). The proposed licensing of breeders, both large commercial operators as well as private pet owners will go a long way to ensure that the physical and mental wellbeing of all dogs being used for the purposes of breeding, as well as their offspring will be protected, and this is also very much in the interests of the public.

Yours sincerely,

Dr. Cynthia Smillie BVM&S PG Dip CABC MRCVS