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Department  
for Environment  
Food & Rural Affairs

# **Consultation on the review of animal establishments licensing in England**

**December 2015**



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This publication is available at <https://consult.defra.gov.uk/animal-health-and-welfare/consultation-on-the-review-of-animal-licensing>

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# 1. Overview

Local authorities are required by law to issue licences for specific animal-related establishments and activities, with the aim of maintaining good standards of animal welfare. There is a registration requirement for performing animals, and licensing systems for pet shops, animal boarding, riding establishments and dog breeding.

We estimate that there are approximately 2,300 licensed pet shops, 650 licensed dog breeders, 1,800 licensed riding establishments, and 6,300 licensed animal boarding establishments in England. These comprise the fourth largest group of business licences issued by local authorities, after premises, taxi, and gambling licences.

There is a strong public expectation that animal welfare standards will be robustly enforced by local authorities. However, the laws, and their specific requirements, are often decades old, and difficult to adapt to the changing types of animal-related businesses, and to new standards of good practice in animal welfare. Moreover, the current process is complex and burdensome for both businesses and local authorities. For instance, primary legislation limits licences to a calendar-year framework, arbitrarily focussing inspections at the end of the year, and forcing some businesses with multiple functions to have as many as three separate licences.

As part of its commitment to Better Regulation, Defra is conducting a cross-cutting review of licences and permits. The Government is committed to improving the effectiveness of existing regulation whilst lifting the regulatory burdens on businesses to support growth. This consultation sits within that wider review and aims to relieve the administrative burden on local authorities, simplify the application and inspection process for businesses, as well as maintain and improve existing animal welfare standards by modernising the current animal licensing system in England.

We are proposing to introduce new secondary legislation under the Animal Welfare Act 2006, as had been anticipated when the Act was originally enacted. This would introduce a single 'Animal Establishment Licence' for animal boarding establishments, pet shops, riding establishments, and dog breeding.

## Background

The Animal Welfare Act 2006 provides for the welfare of all kept animals. The law requires anyone responsible for an animal to ensure that its needs are met to the extent required by good practice. These needs explicitly include a suitable environment, a suitable diet, the ability to exhibit normal behaviour patterns, to be housed with, or apart from, other animals, and to be protected from pain, suffering, injury and disease.

In addition to these overarching requirements of the Animal Welfare Act 2006, a number of older pieces of legislation (listed below) further regulate particular animal activities in

England. These laws require local authorities to issue licences regulating such activities, in the interests of animal health and welfare, and public safety:

- Pet Animals Act 1951
- Animal Boarding Establishments Act 1963
- Riding Establishments Act 1964
- Riding Establishments Act 1970
- Breeding of Dogs Act 1973
- Breeding of Dogs Act 1991
- Breeding and Sale of Dogs (Welfare) Act 1999

All of the acts require local authorities to grant licences subject to compliance with a set of standards, specific to the type of activity in question. They enable local authorities to inspect the premises, allow an appeals process to the courts in case of refusal or onerous conditions, provide that operating without a licence is an offence, and set out a number of disqualifications that are relevant to the local authority when assessing licence applications (such as a conviction for animal cruelty). They also permit a local authority to recover the costs for inspection, processing, and enforcement expenditure through a licence fee.

An older law, the Performing Animals (Regulation) Act 1925, requires exhibitors of performing animals to register them with their local authority, although no licence is needed.

## **Review of animal licensing**

The current licensing system has served its purpose for several decades, but it has a number of limitations, partly as a result of its age and the gradual development over time of the activities being licensed. It is administratively complex and involves a considerable amount of duplication; it does not account for the diversification in animal activities, notably those on the internet; and it does not reflect current and up-to-date knowledge of companion animal welfare.

Stakeholder groups coordinated by the Chartered Institute for Environmental Health have created 'Model Conditions,' endorsed by Defra, for a number of the licensed animal activities, including dog breeding, pet vending, dog kennels, and catteries. These include detailed, up-to-date guidance for both businesses and local authority officers. However, there is considerable variation in the inspection regime run by local authorities, and Model Conditions are not always used to guide inspections.

As part of our cross-Department review of licensing, Defra undertook an informal review of animal licensing. As part of this review, we circulated a questionnaire to key stakeholders

in industry, local government, and animal welfare organisations. Respondents were strongly in favour of introducing new Regulations under the Animal Welfare Act 2006 to replace the existing licensing legislation. They also highlighted several aspects of the licensing system that could be improved.

## Proposed changes to animal licensing

We are proposing to introduce secondary legislation on licensing under the Animal Welfare Act 2006, as had been anticipated when the legislation was originally developed. This would update and replace existing legislation for animal boarding establishments, pet shops, riding establishments, and dog breeding. The revised Regulations would:

- a. Create a single 'animal establishment licence' for these activities that reflects current knowledge on animal welfare, the diversification of the sector (including operation on the internet), and refers local authorities to the existing bespoke Model Conditions.
- b. Update the legal requirements for each licensed activity, including clarifying standards around the sale of puppies, the licensing threshold for dog breeding, and the provision of information alongside pet sales.
- c. Allow licences to be issued at any point in the year for a fixed term (as opposed to within the parameters of a calendar year), allow licences to be transferred to new owners of premises, and require licence-holders to notify local authorities of major changes.
- d. Increase the maximum length of time that a licence can be issued for by a local authority (up to a maximum of three years), and encourage them to use risk-based assessment to assess the suitable length of a licence.
- e. Allow an exemption from licensing requirements for businesses affiliated to a UKAS-accredited body, provided that the accreditation scheme enforces, at a minimum, the standards required of non-accredited businesses referred to in the regulations.

Each of these proposals is discussed in detail below, along with a set of questions. The consultation provides an opportunity for anyone to comment on these proposals, and submit further evidence if they wish.

## Primary authority

The scope for businesses to apply for Primary Authority status is relevant for animal establishment licensing and will continue to apply. Primary Authority is a statutory based system that enables a business to form a legally recognised partnership with one local authority (the 'primary authority') to get assured advice about how they can comply most efficiently with regulation. This advice, known as Primary Authority Advice, must then be

taken into account by other local authorities when dealing with that business e.g. when carrying out inspections or addressing non-compliance.

More information on the concept is available on line:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/348664/14-1058-pa-guide-for-officials.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/348664/14-1058-pa-guide-for-officials.pdf)

## Responding to this consultation

This consultation will run for 12 weeks from 20<sup>th</sup> December 2015 to 12<sup>th</sup> March 2016.

Please respond to this consultation using the Citizen Space consultation system:

<https://consult.defra.gov.uk/animal-health-and-welfare/consultation-on-the-review-of-animal-licensing>

Our preferred method of receiving responses is online because it is the fastest and most cost-effective way for us to collate and analyse responses. If you wish to respond to the consultation by email or in writing, please send responses to:

By email – [AnimalWelfare.Consultations@defra.gsi.gov.uk](mailto:AnimalWelfare.Consultations@defra.gsi.gov.uk)

Or

Animal Welfare Team  
Area 4B  
Nobel House  
17 Smith Square,  
London  
SW1P 3JR

Please make sure your responses reach us by 12<sup>th</sup> March 2016.

## What happens next?

This consultation is an opportunity for all interested parties to scrutinise and comment on our proposals, and, if needed, supply further evidence.

After the consultation has concluded we will publish a summary of the responses received. This will inform the final regulations we will lay before Parliament.

## Confidentiality and data protection

A summary of the responses to this consultation will be published and placed on the Government website at [www.gov.uk/defra](http://www.gov.uk/defra)

The summary will include a list of names and organisations that responded but not personal names, addresses or other contact details. Information provided in response to this consultation, including personal information, may be subject to publication or release to other parties or to disclosure in accordance with the access to information regimes e.g. Freedom of Information Act 2000 (FOIA) and the Data Protection Act 1998.

If you want information, including personal data, that you provide to be treated as confidential, please say so clearly in writing when you send your response to the consultation why you need to keep these details confidential. If we receive a request for disclosure under the FOIA, we will take account of your explanation, but we cannot provide an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, if itself, be regarded as a confidentiality request.

This consultation is being conducted in line with the “Consultation Principles” as set out in the Better Regulation Executive guidance which can be found at <https://www.gov.uk/government/publications/consultation-principles-guidance>

If you have any comments or complaints about the consultation process, please address them to:

Consultation Co-ordinator  
Room 629  
9 Millbank  
17 Smith Square  
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Or email: [consultation.coordinator@defra.gsi.gov.uk](mailto:consultation.coordinator@defra.gsi.gov.uk)



## 2. Animal establishment licences

Animal licences have developed over time, through a series of different Acts of Parliament. As a result, although the licensing schemes are generally similar, and usually administered by the same local authority staff, each activity is regulated separately by one or several specific pieces of legislation. Dog breeding, for instance, is regulated by three separate laws. This creates unnecessary complexity around the legal requirements, for both local authorities and businesses. Moreover, some types of businesses require more than one type of licence – both an animal boarding and pet shop licence, for example – for broadly similar and related activities.

We propose, therefore, to introduce revised regulations under the Animal Welfare Act 2006, which update and consolidate the animal licensing system into a single piece of legislation. We would also take the opportunity to simplify the administrative process, and reflect up-to-date knowledge on animal health and welfare.

### a) Generic licences

We propose a single ‘Animal Establishment Licence’ for dog breeding, animal boarding, pet shops, and riding establishments. The law will be clear that online and home-based businesses must also be licensed. Each individual activity will have specific standards, but the process and the level of animal welfare protection will otherwise be the same. In addition, businesses will only need one licence, and can expect all of their activities to be covered by a single inspection.

**Question 1: To what extent do you agree or disagree with the proposal to introduce a single Animal Establishment Licence? Please provide any comments or evidence to support your answer.**

### b) Model conditions

Stakeholders largely agreed that some of the legal requirements for animal establishments set out in current legislation are outdated, and do not necessarily reflect current expertise on animal welfare. We propose, therefore, to update the minimum legal requirements for each animal activity, based on the current scientific and technical evidence base on animal health and welfare. This will be set out in revised regulations, which will mean that in future changes can be made more easily by amending regulations rather than changing primary legislation. This will allow us to keep the system up to date with both the science and best practice in animal keeping. We also propose to emphasise or require that local authorities should use the agreed and up-to-date Model Conditions produced by the Chartered

Institute for Environmental Health which exist for Dog Breeding and Pet Vending<sup>1</sup> when deciding if a licence should be granted and when setting any relevant licence conditions. These include detailed, up-to-date guidance for both businesses and local authority officers.

**Question 2: To what extent do you agree or disagree with the proposal to promote or require use of the Model Conditions by local authorities, for activities where they have been agreed? Please provide any comments or evidence to support your answer.**

### **c) Breeding and sale of dogs**

Concerns associated with dog breeding can be dealt with through the existing powers available to local authorities and the requirement on certain breeders to be licensed. However, new secondary legislation also provides the opportunity to make adjustments to the legal requirements. We propose to make, at minimum, two important changes to the legal conditions for dog breeding licences.

At present, the Breeding and Sale of Dogs (Welfare) Act 1999 makes it an offence to sell a dog at less than eight weeks of age, “otherwise than to the keeper of a licensed pet shop.” Current evidence on animal welfare suggests that puppies should not be separated from their mother during this period. We propose, therefore, that the sale of puppies under eight weeks of age should be prohibited in all cases, and amendments made to the law to effect this change.

The 1999 Act also requires any dog breeders with five or more litters per year, or in the business of breeding dogs for sale, to be licensed. Although Defra wrote to all local authorities in England in November 2014 to emphasise that this did not necessarily exempt breeders with four or fewer litters per year, some confusion still remains about the threshold and how it should be used in practice. Some may still regard the five litter test as the threshold, and not apply the business test for those producing fewer litters. Furthermore, five litters could comprise up to forty dogs or possibly more, and it is difficult to conceive of a breeder producing such an amount and not operating as a business. We propose, therefore, to clarify the threshold at which a breeding establishment needs to be licensed. In the future the requirement for a licence would be applied to: (a) anyone in the business of breeding and selling dogs; or (b) anyone producing three or more litters from their dogs in a 12 month period.

We would propose to retain the existing requirements that each breeding bitch should only produce one litter per 12 month period, that they cannot be mated if they are under one year of age, and that they cannot give birth to more than six litters in their lifetime.

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<sup>1</sup> [http://www.cieh.org/policy/Model\\_Conditions\\_for\\_Pet\\_Vending\\_Licensing\\_2013.aspx](http://www.cieh.org/policy/Model_Conditions_for_Pet_Vending_Licensing_2013.aspx) and [http://www.cieh.org/CIEH-Model\\_Licence-Conditions-Guidance-Dog-Breeding-Establishments.html](http://www.cieh.org/CIEH-Model_Licence-Conditions-Guidance-Dog-Breeding-Establishments.html)

**Question 3: To what extent do you agree or disagree with the proposal to prohibit the sale of puppies below the age of eight weeks? Please provide any comments or evidence to support your answer.**

**Question 4: To what extent do you agree or disagree with the proposal to make clear that the statutory licensing threshold for dog breeders is set at three or more litters per year? Please provide any comments or evidence to support your answer.**

## **d) Pet sales**

The commercial importation of dogs, cats and ferrets from another EU Member State is already subject to strict conditions, including microchipping, vaccination, deworming, and an accompanying pet passport and health certificate.

Domestically, although the Pet Animals Act 1951 already has a definition of “pet shop” that is sufficiently wide to include the sale of pets on-line, any new legislation should be emphatic that all domestic commercial pet sales must be licensed.

Local authorities already have the power to apply conditions to individual pet shop licences (for example, restricting the species that can be sold). However, there is a potential to incorporate further, proportionate measures to address concerns around exotic animals. Our evidence suggests that most concerns are about inexperienced owners who can fail to properly care for their exotic pets, with risks to animal welfare and possibly to public safety.

When the Animal Welfare Act 2006 was initially drafted, there was a proposal to require pet shops to distribute information about the animal type to buyers of pets. Although this did not become law, a number of pet vendors have since voluntarily developed such written information, including all members of the Pet Industry Federation. We propose to make this a legal requirement for licensed pet sales.

**Question 5: To what extent do you agree or disagree with the proposal to legally require pet sales to provide written information when selling animals? Please provide any comments or evidence to support your answer.**

**Question 6: What other proportionate measures could address concerns around the care of exotic animals?**

### 3. Length of licences

We propose to make several changes to the terms of the licences themselves making them more flexible and adaptable to circumstances.

#### a) Removing the calendar-year restriction

Under current legislation, most animal licences are valid only for the calendar year in which they are issued. This calendar-year framework means that inspections and administrative activity are focussed at the end of the year, as local authorities process most licence renewal applications.

We consider that when an application is received close to the end of the year, it is unnecessary to insist on renewal soon after. We propose, therefore, to allow licences to be issued for a fixed term, set at any point in the year.

**Question 7: To what extent do you agree or disagree with the proposal to allow licences to be issued for a fixed term, set at any point in the year? Please provide any comments or evidence to support your answer.**

#### b) Increasing the maximum licence length

We would like to see greater risk-based assessment used in inspection and enforcement activities. This would mean that businesses that show consistent good practice and compliance benefit, and local authorities would have more time to spend on improving welfare standards at poor-performing establishments.

For example, where an establishment has had several annual inspections without significant compliance issues arising, the local authority may wish to renew the licence for a longer period of two or three years. In addition the local authority could reduce the annual licence fee for such establishments. We would ensure that there is clear guidance on this process, and that properly tested risk-based approaches are a prerequisite of longer licences. Risk assessment has successfully been used in licensing and permitting elsewhere, such as in operator licensing by the Environment Agency.

We propose to increase the maximum length of a licence that local authorities may issue, at their discretion, from one to up to three years. Local authorities would continue to set licence fees on a cost recovery basis, and would be able to set lower fees for more compliant licence holders. Local authorities would continue to have the ability to inspect if welfare concerns arise or if there are significant changes in the licensed premises or activities.

**Question 8: To what extent do you agree or disagree with the proposal to increase the maximum length of a licence that local authorities may issue to up to three years? Please provide any comments or evidence to support your answer.**

### **c) Transferring licences**

We propose to allow licence holders to transfer licences to new owners of the same premises, subject to notification of and approval by the local authority.

**Question 9: To what extent do you agree or disagree with the proposal to allow licence holders to transfer licences to new owners of the same premises, subject to notification of and approval by the local authority? Please provide any comments or evidence to support your answer.**

### **d) Notification of major changes**

We propose to require licence holders to notify local authorities of major changes, such as a change of premises or scale of activities.

**Question 10: To what extent do you agree or disagree with the proposal to require licence holders to notify local authorities of major changes, such as a change of premises or scale of activities? Please provide any comments or evidence to support your answer.**

## 4. Performing animals registration

The Performing Animals (Regulation) Act 1925 currently requires those exhibiting or training performing animals to register with their local authority. Although a licence is not required, local authorities have powers of entry and inspection, and can take action under the Animal Welfare Act 2006 if there are concerns regarding animal welfare. This can be an effective regulatory tool, especially in providing useful guidance.

We propose to maintain this registration requirement, while updating the legal standards to explicitly refer to the welfare needs set out in the Animal Welfare Act and at the same time remove the need for local authorities to send copies of the paperwork to Defra. We also propose to extend powers of inspection to premises where performing animals are kept.

An alternative is that the Performing Animals (Regulation) Act 1925 is repealed, removing the requirement to register performing animals. The rationale would be that there are relatively few activities that fall under this Act and they are covered already by the Animal Welfare Act 2006.

**Question 11: To what extent do you agree or disagree with the proposal to maintain the registration requirement for performing animals? Please provide any comments or evidence to support your answer.**

**Question 12: To what extent do you agree or disagree with the proposed changes to the registration system for performing animals? Please provide any comments or evidence to support your answer.**

## 5. Powers of entry

Following the Protection of Freedoms Act 2012, Defra reported on its Powers of Entry review to Parliament in November 2014. The [review](#) recommended that safeguards be added to the powers of entry into dwellings given to local authorities under the animal registration and licensing legislation discussed above.

In line with the recommendations of the review, we propose to add safeguards to powers of entry, to include: if entry is not gained by consent, a warrant will be required to enter dwelling premises; a maximum of four persons may make use of this power of entry; and reasonable notice will be given of the application for a warrant unless such notice would defeat the object of the entry.

**Question 13: To what extent do you agree or disagree with these proposals on powers of entry? Please provide any comments or evidence to support your answer.**

## 6. Accreditation

The law currently sets out minimum welfare standards for all kept animals under the Animal Welfare Act 2006, and includes more specific standards for some animal activities. To assure conformity and compliance with these standards, independent accredited certification can be a useful alternative to direct regulation by Government, and may be more appropriate for certain types of activity.

Two types of certification are discussed here below: UKAS-accredited certification of legal welfare standards as an alternative to licensing, and voluntary accredited certification for unlicensed activities.

### a) UKAS accreditation of independent regulators

Since the Welfare of Racing Greyhounds Regulations 2010, all greyhound racing tracks in England are required to meet certain minimum welfare standards. These standards are either enforced by a local authority, via a licence, or alternatively by a body which has secured accreditation from the United Kingdom Accreditation Service (UKAS) in respect of the enforcement of these standards. The Greyhound Board of Great Britain successfully secured UKAS accreditation, and now regulates 24 of the 29 racing tracks in England. The remaining five are licensed by local authorities.

Several industry bodies have begun to develop certification schemes for other animal activities, some of which have been accredited by UKAS. We would like to open the possibility of a similar regulatory model across animal licensing in the future.

We propose to allow an exemption from licensing requirements for businesses affiliated to a body accredited by UKAS to certify, at a minimum, the legally-required welfare licence conditions.

For example, if a body creates a certification scheme for dog kennels that enforces the requirements set out in legislation, and this scheme receives accreditation from UKAS, then businesses regulated by this body will no longer require a local authority licence.

**Question 14: To what extent do you agree or disagree with the proposal to allow an exemption from licensing requirements for businesses affiliated to a body accredited by UKAS? Please provide any comments or evidence to support your answer.**

### b) Voluntary accreditation

A number of types of animal business or animal activity do not require a licence, such as commercial breeders of animals other than dogs, livery yards, sanctuaries and pet



grooming. Such establishments are still subject to the Animal Welfare Act and have to provide for the welfare of their animals. Local authorities have powers to take action under the Act where poor welfare is evident. Indeed any person can take a prosecution under the Act. Nevertheless there have been suggestions that these establishments should be brought under the welfare licensing system although this would be a considerable new burden on the businesses and charities operating in this area. We are interested in stakeholder views and alternative proposals, such as sector-led UKAS-accredited certification schemes. Such schemes endorsed and policed by the relevant sector can be an effective method of improving standards. Local authorities can be reassured that establishments that have the stamp of approval from an authoritative and respected trade body that undertakes its own inspections and has UKAS accreditation are more likely to be meeting welfare standards. Encouraging such sector-led certification could assist with an intelligence-led approach and improve targeting of enforcement activity.

**Question 15: Do you think sector-led UKAS-accredited certification schemes could improve animal welfare in unlicensed areas? If so, what would work best and how could this process be encouraged?**

## Summary list of questions

Question 1: To what extent do you agree or disagree with the proposal to introduce a single Animal Establishment Licence? Please provide any comments or evidence to support your answer.

Question 2: To what extent do you agree or disagree with the proposal to promote or require use of the Model Conditions by local authorities, for activities where they have been agreed? Please provide any comments or evidence to support your answer.

Question 3: To what extent do you agree or disagree with the proposal to prohibit the sale of puppies below the age of eight weeks? Please provide any comments or evidence to support your answer.

Question 4: To what extent do you agree or disagree with the proposal to make clear that the statutory licensing threshold for dog breeders is set at three or more litters per year? Please provide any comments or evidence to support your answer.

Question 5: To what extent do you agree or disagree with the proposal to legally require pet sales to provide written information when selling animals? Please provide any comments or evidence to support your answer.

Question 6: What other proportionate measures could address concerns around the care of exotic animals?

Question 7: To what extent do you agree or disagree with the proposal to allow licences to be issued for a fixed term, set at any point in the year? Please provide any comments or evidence to support your answer.

Question 8: To what extent do you agree or disagree with the proposal to increase the maximum length of a licence that local authorities may issue to up to three years? Please provide any comments or evidence to support your answer.

Question 9: To what extent do you agree or disagree with the proposal to allow licence holders to transfer licences to new owners of the same premises, subject to notification of and approval by the local authority? Please provide any comments or evidence to support your answer.

Question 10: To what extent do you agree or disagree with the proposal to require licence holders to notify local authorities of major changes, such as a change of premises or scale of activities? Please provide any comments or evidence to support your answer.

Question 11: To what extent do you agree or disagree with the proposal to maintain the registration requirement for performing animals? Please provide any comments or evidence to support your answer.

Question 12: To what extent do you agree or disagree with the proposed changes to the registration system for performing animals? Please provide any comments or evidence to support your answer.

Question 13: To what extent do you agree or disagree with these proposals on powers of entry? Please provide any comments or evidence to support your answer.

Question 14: To what extent do you agree or disagree with the proposal to allow an exemption from licensing requirements for businesses affiliated to a body accredited by UKAS? Please provide any comments or evidence to support your answer.

Question 15: Do you think sector-led UKAS-accredited certification schemes could improve animal welfare in unlicensed areas? If so, what would work best and how could this process be encouraged?