

## PE01561: Pet Rabbit Welfare

Thank you for allowing me the opportunity to respond to the numerous submissions received in response to the petition.

I am extremely grateful for all the submissions received and for the support and backing of the various welfare organisations and rescues who took the time to add their input. We are, for all intents and purposes, singing from the same hymn sheet; our backgrounds in rabbit welfare are varied, but we all have the common factor that we have dealt with the often horrendous rescue situation 1<sup>st</sup> hand and are more than aware of the numerous cases of neglect that come through our rescues. It is NEVER just a case of finding the no longer wanted bunny a new home, but treating the many, varied and all too often, avoidable, costly and harrowing health issues that they ALL arrive with! We have all sadly, witnessed the terrible suffering which, with the proper knowledge and care, could have been easily avoided.

The Make Mine Chocolate campaign have highlighted key areas sourced from data originating from 2010-11 from 4235 rabbits entering rescue, a few of which I would like to re-cap:

- 52% of rabbits entering rescue came from a shop/garden centre with Pet 'superstores' being the most common point of acquisition.
- Almost a quarter of rabbits entering rescue were bought for a child.
- 34% of rabbits entering rescue did so because their primary carer, a child, lost interest and didn't want the pet any longer.
- The most shocking statistic of the survey revealed that 59% of rabbits entering rescue were surrendered within one year of purchase, with 36% surrendered within 6 months.

The only changes you will find in 2015 is that the numbers are far increased, and at a less than sustainable rate than our rescues can deal with, whether it be practically, financially or emotionally.

Given also that the Scottish SPCA's rabbit rescue numbers for the period 01/01/2014–31/12/2014 stood at 737, and bearing in mind they only take in either abandoned or serious welfare 'enforced' surrenders, and not the run of the mill, 'no longer wanted' bunny, this figure in itself is alarming! More so when compared with previous years.

Additionally, the [RWAf \(The Rabbit Welfare Association and Fund\) 2012 study](#) estimated that somewhere in the region of 67,000 rabbits entered rescue. This is a dramatic, almost double increase since previous studies in 2006 estimated these figures to be around 35,000; these figures however, do NOT take into account those re-homed via other means or simply 'set free'. RWAf are currently in the process of renewing this study to ascertain more recent numbers.

It is the independent, voluntary led, smaller rescues that deal with the biggest of the fall-out from the welfare crisis. They have extensive waiting lists; they struggle not only emotionally due to the severity of neglect many rabbits endure, but financially cleaning up the mess. Adequate funding is difficult to come-by, Vet bills are high and that's before vaccinations/neutering and general upkeep, maintenance and housing are all paid for. Good welfare savvy homes are not easy to come-by and therefore rabbits wait a considerably long time for a new home, and all the whilst the waiting list grows.

Additionally, Camp Nibble's submission highlights statements from PDSA and RWAf, including an excerpt from Richard Saunders, BSc (Hons) BVSc MSB CBiol DZooMed (Mammalian) MRCVS Referral Vet, Zoo and Exotic Species and RWAf Veterinary Expert Advisor, who all highlight the various issues surrounding rabbit welfare and the problems created by the ease of which these small animals are bought. The issues that surround rabbit welfare are widely recognised within the field of animal/rabbit welfare, and without change, they will only continue to worsen and grow.

We recognise the internet is at times hard to police, however PAAG and the various organisations involved, work hard in this area to monitor and limit unlawful or questionable activity and rely largely on members of the public reporting dubious activity. Websites however, are under no obligation to sign up to work with PAAG, and as such remains voluntary.

The number of breeders/sellers on sites like e.g. Preloved, Gumtree, Facebook etc. are unlicensed and out of control. DEFRA are supportive of these 'unlicensed pet shops being licenced', and have suggested that the 7 Badges Of Trading can be used to help curb and control these activities.

However, we CAN readily address the situation in our high streets and unregulated breeders. There are no controls over breeding of domestic rabbits and as such, anyone can set up a breeding empire in their back garden with little or no knowledge, experience nor welfare checks. Breeders who supply pet stores are supposed to be licensed but this is not always the case.

Likewise we can do similar steps towards promoting improved rabbit welfare to the owner by setting legal minimum size guidelines on housing and dietary products, of which there are currently none. Wholly unsuitable housing items, sometimes measuring less than 3ft, are freely available to buy and marketed as rabbit homes. Cages fair no better and are commonly used as a 'modern' indoor prison. The public will always, after-all, opt for the 'cheaper' alternative without fully realising the potential – physical and emotional - harm they will impose on their pet.

Beverly Williams, Scottish Government highlights housing issues in the Scottish Gov's response, however these only apply to both farmed or laboratory rabbits, not domestic. Guidelines on rabbit housing systems exist, because there are no European rules regarding rabbit housing, apart from those on laboratory animals (EC Directive 2010/63). But, animal welfare is indivisible and the housing of rabbits for scientific purposes and of pet or home rabbits as well should also be included

Commercial foodstuffs were manufactured largely for commercial interests in regards to raising rabbits, where their lives hold little value other than to fatten them up for slaughter. As a whole, there is a heavy reliance on such foods in our pet stores which in turn, not only give the pet buying public the wrong message, but will and does, harm rabbit health through overfeeding, specifically where the cheaper to feed, muesli style mixes are concerned.

Treat items are full of dairy, egg, seeds, nuts, corn etc. All of these items should not be fed to rabbits; as natural 'vegans' their digestion cannot tolerate these foods and leads to dental problems, obesity, diarrhoea and other health issues. Seeds, corn and nuts have been proven to cause choking hazard of gut impactions. Yet these are 'knowingly' freely marketed towards rabbit owners as suitable for their pets.

I am disappointed but not surprised that the PIF response was flimsy with no real substance or justification in defence of the changes we petitioned for.

As I'm sure you know, the board and directors are made up of various individuals with financial interests in the continued sale of live animals (against the growing concerns of numerous welfare organisations). Yet they continue to freely sell, in large numbers, rabbits and related, unsuitable products, of which they know full well, fall below recommended welfare standards, advice and knowledge.

Additionally, they stood against a very successful campaign to the UK Government, by Marc the Vet's [PupAid's e-petition](#) which gathered over 1110,000 signatories. The specific campaign may have been focused on dogs, but the issues remain for all pets being kept and sold in shops - be it dogs, cats, rabbits and others.

This move by the Pet Industry Federation (PIF) to support the continued sale of pets in shops disagrees with professional advice given by RSPCA, Dogs Trust, Kennel Club, Wood Green, Blue Cross, Battersea Dogs & Cats Home, Mayhew, Dog Advisory Council, even the Government's own website. It is also interesting to note the letter to MPs asking for the sale of pets to continue in shops comes from The Pet Charity; a sub-organisation of the Pet Industry Federation.

Furthermore, we previously we highlighted one, out of MANY Pet Stores utilising Social Media to promote their businesses, and many in doing so, demonstrated scant regard for animal welfare: The Pet Shop Kilmarnock openly advertised Easter Bunnies as the ideal gift for kids. As one of the many retail members of PIF, this does little to reassure concerns that the '[Charter](#)' or even perhaps the ethos of the organisation is indeed fit for purpose, as members clearly do not always adhere: and there seems to be little effort to govern.

Based on these facts, the PIF's response to the petition holds no real bearing and shows scant concern to the

issues at hand nor provides any real argument against these proposed changes.

In principle we have no real issue with the Animal Health and Welfare Act (Scotland). Section 24 clearly states that the 5 welfare needs of animals is a legal requirement and as such must be provided to the particular species by the keeper, whether permanent or temporary. These however, are not being enforced where rabbits are concerned and this is where one of the numerous welfare problems lie.

We met with both Scottish Government's Animal Welfare Division & the Scottish SPCA to ascertain best way of achieve this for rabbits; talks with the Scottish Government official indicated that Guidance seemed to be the preferred choice, however, Mike Flynn SSPCA clearly prefers Codes of Practise as a route of enforcement.

We are not the law makers, but the people urging you to make the laws affective for Rabbit Welfare. We wish to see these 5 welfare needs enforced and would happily accept the route that would achieve this.

However, enforcement alone will not work if the current situation is not addressed. Prevention is key, and the only way to achieve this is to

1: Regulate and licence breeding.

2: Limit sales by implementation of the growing popularity of Ordnances (similar to various cities and states within in the USA), thus benefiting and alleviating the burden on rescues.

4: Set minimum welfare housing and dietary criteria for rabbits.

5: Create a national, uniform standard in licensed pet vending outlets by ensuring all Local Authorities implement MCPVL (Model Conditions for Pet Vending Licensing 2013).

6: Training, knowledge and experience in rabbit welfare for enforcement via qualified animal welfare officers, such as the SSPCA.

I recently gathered the terms of Pet Shop License from all 32 LAs and they all use a similar, very basic structure based solely on the vastly outdated Pet Animals Act 1951 – which we are aware is up for discussion/possible review via Onekind's tireless efforts on campaign for change in Pet Vending – which we wholeheartedly support.

From these 32 LAs, there are only 3 (Argyll & Bute, East Lothian and Aberdeenshire) who utilise both the 'basic' structure & the MCPVL, yet conditions in our stores clearly shows that these are not being incorporated, applied nor fully enforced.

Regardless of submitting many complaints to the LAs on poor practise, very little is ever done. The vastly outdated legalisation, Pet Animals Act 1951 is neither fit for purpose and clearly not being enforced by those who should. It appears, to not just me, but many others who have made reports about poor welfare in stores and licence breaches, that animal welfare is of low priority, whilst knowledge, experience and enforcement is severely lacking.

Whilst there have been some improvement in rabbit welfare over the last 10 years, progress is painfully slow and overall improvement, small and usually only implemented under duress from welfare organisations. A significant step change in the approach to improving rabbit welfare is now needed to stop the suffering of many thousands of rabbits annually; if the current legislation and welfare acts were working as they should, this petition would not have been needed. But sadly its' need is very clear to all those involved in rabbit welfare that change is sorely needed.

Our Animal Welfare laws simply do NOT protect rabbits - people continue to buy them as they're sold / bred too easily, buy awful products that harm health but are freely sold as 'suitable' then treat them like toys only to forget all about them once the novelty wears off - Rabbit welfare is nothing more than a hidden neglect and one that the public, largely, have little interest in, nor realise the extent of the suffering on these vastly overlooked pets.

We do not expect an overnight transformation with the issues raised that we urge you to incorporate in order to curb the current rabbit welfare crisis. It would be extremely naive to think otherwise, specifically with the

difficulties in monitoring online sales; however, by implementing these much needed changes it WILL be a hop in the right direction.

The Ordances introduced in areas within the USA may not be uniform due to geographical differences in the various States and Cities, but the ethos behind them are making a dramatic difference. The House Rabbit Society have noticed great benefits, specifically on the issues of rabbit welfare vs pet shop sales; rescues, whilst still busy, are able to reach the rabbit buying public, provide the correct care and welfare information to potential new owners, thus not only alleviating the burden on rescues but lessen the high instances of euthanasia in overcrowded shelters.

We will only truly be able to change outdated perceptions and educate into correct welfare needs through limiting rabbit sales in our stores, by working closely with rescues who will in turn, enable the public be given full and proper care information, access and information into the correct welfare products, and the renewed knowledge that our Animal Welfare Legislation does indeed protect rabbit welfare, in all areas, so that reports of neglect are actually addressed.

We simply cannot continue to allow these highly intelligent animals to suffer under a chain of neglect, misunderstanding nor continue to condone these highly intelligent, active and agile animals spending their – short – lives in inadequate, cramped conditions.