The Pet Industry Federation welcomes initiatives which improve animal welfare and believes all animals should be bred and sold responsibly.

1. **Introduce licensing regime for sellers of young rabbits**

The major concern is for rabbits bred speculatively and sold via the internet or classified advertisements. Given the nature of these sales introducing a licensing scheme would be unrealistic for local authorities to enforce.

2. **Initiate a ban on pet shop sales via the implementation of Ordinances Protecting Rabbits**

Ordinances protecting rabbits as seen in the USA are not in the main concerned with an outright ban on sales of rabbits, but instead concentrate on inhibiting sales under certain circumstances eg minimum age.

In the UK, pet shops are regulated under the Pet Animal Act and are inspected and licensed by local authorities. Licenses are issued against a number of criteria including:

- at least one person at the shop should hold the level 3 pet store management qualification, which is equivalent to the RCVS Veterinary Nursing qualification
- care sheets must be given at point of sale
- animals are kept in suitable accommodation and fed an appropriate diet
- animals are not sold to persons under the age of 16.

Furthermore pet shops are scrutinised by the pet owning public on a daily basis. Banning the sale of rabbits from pet shops will send people to unregulated sources (eg the internet) when buying their rabbits, which increases risks to animal welfare and consumer rights.

3. **Create minimum standards for pet related products**

Pet foods are regulated and there are some 50 pieces of legislation governing its manufacture. Furthermore, who would be responsible for ascertaining which products meet the minimum standards, and who would be responsible for costs involved?

Whilst minimum standards on non-food products are a great aspiration, this would be impossible to enforce, especially given the rapidly growing internet market and bargain basement auction sites.

4. **Make one body responsible for overseeing and enforcing pet shop regulations.**
The Pet Industry Federation has been concerned for some time that there is a lack of consistency between licensing conditions. Although many local authorities do follow one of the model license conditions for pet shops, there is no mandatory requirement for councils to use them and thus we see licensing requirements varying between local authorities.

A practical approach to consistency would be for all councils to use the latest version of the model licence conditions, the CIEH Model Conditions for Pet Vending Licensing 2013, written in consultation with, welfare organisations, veterinary professionals and enforcement officers.

A lead or Primary Authority model could be adopted whereby one local authority can offer assured advice to the others.

The Pet Industry Federation believes there is already sufficient legislation to protect the welfare of rabbits. The Federation would also draw your attention to the rabbit strategy being written in consultation with welfare organisations, scientists, breeders, pet industry and the veterinary profession. Currently in development, the document maps out a clear vision for improving welfare.