We once again would like to express our extreme gratitude to the Petitions Committee for their continued interest and support into the matters raised and again would like to state that Rabbits Require Rights (Scotland) do of course welcome the upcoming reviews by the Scottish Government into current Animal Welfare Legislation. However we will continue to stress that other measures do drastically need to happen for the overall improvement and welfare of our most neglected pets, Rabbits.

Minimum housing to reflect welfare recommendations is urgently required. The RWAF, alongside numerous other animal welfare organisations, recommends a minimum hutch size of 6x2x2 ft which should be attached to a secure run of at least 8x6 ft. Similar housing size recommendations are true for indoor living rabbits, if not possible to 'free range' within the home.

In their annual study, the PDSA Animal Wellbeing (PAW) Report 2105 shows that 97% of veterinary professionals believe that rabbit hutches smaller than a recommended size should be banned from sale, such is the harm they do to health, physical and emotional well-being of these highly misunderstood companion animals.

It is also interesting to note that 69% of owners do not know about the five freedoms - section 24 Animal Health and Welfare (Scotland) Act 2006 – a decrease of 45% since studies began in 2011. This leaves little confidence into the knowledge of those who 'trade' in Rabbits, or indeed other pets.

Limit sales of rabbits on aforementioned areas by means of control of breeders via licensing and implementation of similar proven acts as seen via the Pet Shop Ordinances as are operational in numerous states and cities in the USA. The continued, unregulated sale of rabbits on mass simply cannot be sustained whilst rescues struggle to cope and animals suffer.

Our Charity and our work may well be in it's infancy in real terms, but we have come across many problems at point of sale in our pet stores, as is one of the many reasons behind our formation.

The needs of these complex animals is widely overlooked; their welfare is not catered for by means of inappropriate diets, animals sick, wrongly sexed, injured, poor care advice, harmful –dietary--products, excessively high availability of small housing items clearly advertised and sold as suitable, and all the while our stores continue to sell the wrong message to consumers/pet owners that they are cheap, easy, low maintenance pets and suitable for kids.

Again, if this were cats and dogs being sold in this manner there would be a public outcry. Rabbits are complex animals with needs specific to their species which largely go unaddressed due to the many outdated beliefs and poor husbandry practices prevalent in our stores; this in turn leads to high levels of – often unintentional – neglect and suffering.

Pets At Home – Our largest pet retailer hides numerous problems under the gloss, whilst they appear on the whole to have adequate welfare practises and information available to the pet buying public it is a gamble to any customer as to the advice received from staff.

There are high instances of wrongly sexed rabbits; as rabbits are generally sold in pairs (and rightly so to encourage best welfare for these highly social animals) the sexing of young rabbits prior to
sexual maturity is in itself difficult.

Owners are often shocked to find one day a litter of babies that they neither wanted nor expected. Rabbits as is their nature, breed rapidly and the female can get pregnant moments after birth and have even been known to carry two litters at the same time. Again, these instances are not uncommon and the owners have little recourse on how to deal with the situation and often left to deal with their 'unwelcomed' new pets alone.

The in-store adoption units, operational under the 'Support Adoption' charity leg of PAH, is simply a place for all the 'older, not so cute' leftover baby stock animals, the sick, injured and the returns, or more commonly 'store dumps' to be sold on at a reduced price or minimal 'donation'.

Given that intentionally abandoning animals is illegal under current legislation, 'store dumps' are extremely common and we have gathered numerous testimonies to back these claims. Additionally these instances are rarely reported to the authorities as this would only bring unwelcome attention to their door. PAH stores are on the main, located in large out of town retail parks, and as such, will have adequate security measures such as CCTV operational both within the parks and their own premises, thus making the perpetrators identifiable.

So why are these cases rarely, if ever, not reported?

These large scale operations are rife with problems on many levels. But to the general public, the in store 'adoption units' may seem admiral and numerous Animal Welfare Organisations receive much needed funding through this practise, the truth is, these practises are in themselves abhorrent. The Support Adoption Charity practises found in EVERY PAH stores are NOT an animal rescue operation, as the company would like the public to believe. Yet our real animal rescue facilities continue to struggle with the large numbers of rabbits in their care, a large percentage of which originates from these large retail outlets.

But while these now 'no longer wanted animals' wait, often for long periods of time, in much smaller enclosures, the company continues to import, on mass, new stock baby rabbits into the 'normal' more appropriate sized pet selling enclosures, which naturally the public are more attracted into buying, meantime the older animals linger in much smaller enclosures within the brightly lit, noisy stores with little escape from the everyday hussle and bustle; extremely stressful to a prey species.

The recent introduction of micro-chipping rabbits prior to sale may of course appear responsible, but the main reason is for welfare originations and rescues to ascertain the numbers of Rabbits arriving in their care from PAH stores and data collated.

A company can simply NOT promote good welfare whilst actively and knowingly continue to create an animal welfare problem.

Or smaller independent traders are too often rife with problems, breaches of terms of licence (which after numerous reports, still go unenforced) and flouts in animal welfare legislation are often seen.

For example, we are currently pursuing a case via Small Claims Court after finding a rabbit kept in shocking conditions in a poorly run pet shop, which not only lead to injury at the owner's hands, but suffered numerous serious, yet wholly avoidable health issues through feeding of a highly inappropriate diet, which cost our Charity £1285.40 within four months of purchase. This sum encompasses four periods of hospitalisation at our own vet, The Royal (Dick) School of Veterinary Studies, Rabbit Clinic and two invasive operations. The first admission occurred the very next day.
after purchase.

Even with detailed Vet reports, photographic and video evidence, complaints to the LA Licensing Dept went unheeded. Additionally the owner was recently prosecuted for animal cruelty, and a Freedom Of Information request shows no less than 23 complaints against this shop within the past five years, still he retains his licence; a licence which suggests to the public a level of professionalism, experience and expertise. It simply shows that LA Dept's responsible for overseeing complaints do not fully investigate nor enforce the relevant legislation and terms of licence whilst utilising Veterinary professionals with either an agricultural or general practice background.

Numerous other small pet shop establishments continue to not only house rabbits in less than adequate conditions but feed them highly inappropriate diets which, as was is often the case, leads to numerous health problems for the animal and high vet costs to the owners, if not the loss of their pet.

Again, whilst reviews into this area and the relevant legislation, namely the Pet Animals Act 1951 is in dire need of upgrading, it is imperative that a national standard is set via the implementation of Model Conditions for Pet Vending Licensing 2013 across all 32 Local Authorities in Scotland, whilst adequate training and knowledge to those inspectors is brought up to date and more importantly, enforcement of these terms is actually addressed!

Whilst we have met with government officials previously to express our concerns, we have not, as yet, been invited to attend any stakeholders meetings, and as such, fear the issues will not be addressed in an appropriate manner. Rabbits ARE complex animals with specific needs. Needs that will never be met without proper knowledge and provision within the pet retail industry and if allowed to continue to sell in such high numbers with no safeguards to protect their long term welfare at home with the continuation of selling housing items that are too small and unsuitable for their needs alongside feeding and sale of, harmful pet food products.

Once again, thank you for your time and consideration on these matters and we will look forward to your response and the next stage in the petitions committee proceedings.

Regards
Karen Gray

Chair/Founder
Rabbits Require Rights (Scotland) SCO44268