



# ANIMAL CONCERN

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Tuesday, 02 January 2007

Ms Sarah Noble,  
SEERAD,  
Animal Welfare Branch,  
Room 350,  
Pentland House,  
47 Robb's Loan,  
Edinburgh EH14 1TY

## Consultation on Procedures to be Exempted under Section 20(5) of the Animal Health and Welfare (Scotland) Act 2006.

Dear Ms Noble,

I write on behalf of Animal Concern regarding the above consultation.

Animal Concern does not agree to the permission of any procedure on a sentient creature which will cause that animal pain or suffering. In most instances the mutilation of animals is carried out for reasons of convenience or aesthetics on the part of the owners of the animals. Most dogs which have their tails docked are mutilated simply because breeders and those who show dogs think the animals look better without their tails.

In the case of farmed animals mutilations are carried out to compensate for the unnatural conditions in which they are kept. Rather than provide for the basic needs of animals and birds it is easier and cheaper simply to chop off the beaks, claws, ears, genitals, horns, nipples, tails and teeth which can cause problems when animals are kept in close confinement. As with routine medication of farmed animals these mutilations treat the symptoms without addressing the real cause of the problem – the way we exploit them for our own ends.

Animal Concern urges the Executive to address the real problems and legislate to improve the conditions under which animals are reared and thereby remove the problems currently addressed by routine, painful mutilations. In the 21<sup>st</sup> century it is wrong to subject animals to painful, unnecessary procedures.

No doubt farmers will argue that the alternatives are too expensive, will increase the cost of animal products and leave them open to unfair competition. If treating animals properly means animal products become more expensive then so be it. The consumer should pay the price in pounds and pence instead of animals paying in pain and suffering.

Improving the lot of animals need not be very expensive. For instance changing the law to allow animals in the food chain to be identified by the use of microchips would save time and money by doing away with painful procedures such as ear clipping, tagging and branding. It would also allow much better traceability throughout the system.

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**Animal Concern, a non-profit making company limited by guarantee (Reg. No. SC109126), incorporates *The Scottish Anti-Vivisection Society*, founded in 1876. Registered Office: c/o Campbell, Riddell, Breeze, Paterson Solicitors, 80 St. Vincent Street, Glasgow G2 5UB.**

**We receive no state or lottery aid and rely on the public to fund our campaigns.**

We ask the Executive to give serious consideration to the recommendations contained in the document "Painful Reality" recently produced and distributed by our colleagues at Advocates for Animals in Edinburgh. This backs up the commonsense and obvious arguments against mutilations with hard evidence and fully referenced research.

By adopting the proposals put forward by Advocates for Animals the Executive would strengthen the Animal Health and Welfare (Scotland) Act 2006 instead of watering it down even further until it becomes a charter under which farmers and others can ignore the basic welfare needs of animals.

Animal Concern is realistic enough to recognise that while the same Department and Minister represents both farmers and those animals exploited in the farming industry it is highly doubtful that the needs of animals will be given proper recognition. We regret that it is very unlikely that farming practises will be altered to provide for the basic needs of the animals which are condemned from birth when they enter the human food chain.

At the very least we would expect that any permitted mutilations only be conducted by qualified veterinary surgeons and that the animals be provided with any anaesthesia and analgesics required to remove any pain or suffering. We are also totally opposed to the use of guidelines and codes of conduct to cover any part of the maintenance of the welfare of animals. Unenforceable guidelines and codes of conduct are not worth the paper they are written on.

We also trust that the Executive will ensure that those agencies empowered to police the Animal Health and Welfare (Scotland) Act 2006 are properly resourced to carry out their duties because, if they are not properly resourced, the Act itself is worthless.

Yours sincerely,



John F. Robins,  
Campaigns Consultant

PS: I will e-mail this letter and also post a copy with which I will enclose a completed Respondee Information Form.