



**Comments on the Model Conditions for Pet Vending Licensing 2013
and EMODE for Brighton Council**

Comment on the Model Conditions for Pet Vending Licensing 2013

The Animal Protection Agency (APA) is a UK organisation committed to ceasing the trade in wildlife for pets.

The Pet Industry Federation refutes the APA's claim that the CIEH MLC for pet shop licensing is "unfit for purpose" and also refutes its claim that pet shops commonly lie about the origins of their livestock. This statement cannot be substantiated with factual evidence.

The Pet Industry Federation also contests the group's claim that the trade contributors on the Model Conditions for Pet Vending Licensing were unqualified.

The contributions to the drafting of the Model Conditions for Pet Vending Licensing from the Pet Industry Federation (formally the Pet Care Trade Association) were forwarded by a group of experts including vets, zoologists, and others with considerable experience in animal husbandry.

The 2013 revision of the Model Conditions for Pet Vending Licensing were developed and endorsed by a wide and wholly representative range of experts in animal health, husbandry and welfare, covering a plethora of taxa. It included representatives from the veterinary profession, animal charities and the pet industry.

The 2013 revision vastly surpasses the conditions published in 1992 and 1998 and exceeds the standards required in pet shops, as set out in the 1951 Pet Animals Act (the Act which pet shop licences are issued against).

The 2013 revision is based on robust data and evidence to enable local authority representatives to inspect and license pet retail establishments in a consistent way, and with the welfare of those animals at its core.

Comment on EMODE.

After consultation with some of our MRCVS qualified advisors, the Pet Industry Federation would **not** recommend that this document be handed out at point of sale.

Retailers selling pets have the responsibility, as detailed in the Model Conditions for Pet Vending Licensing, to provide written pet care information. We do not believe this leaflet provides the right kind of information for these purposes.

We further believe that insisting that this particular leaflet be handed out is in excess of the council's legal authority (*ultra-vires*).

Please see the attached statement with further views on the EMODE publication.

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