



**Guidance Notes for Pet and Kennel Owners on the
CIEH (Chartered Institute for Environmental Health)
Model Licence Conditions and Guidance for Dog Boarding Establishments 2016
(hereafter stated as the ‘MLCs’)**

Introduction/Background Notes

This is not intended to comment on the whole of the MLCs, but seeks to clarify and make public the relevant issues with regard to regulations of the boarding of dogs in England.

Even though the Pet Welfare Alliance (PWA) made a submission to the CIEH prior to their consultation that raised issues and provided valid suggestions (together with full scientific support for those findings), the consultation excluded any direct input outside of its members. Members of the consultation group were kept secret until the publication of the MLCs.

As at the time of this publication, the CIEH has no mandatory legal power with regard to any licensing authority or boarding establishment. However, certain local authorities choose to follow the CIEH model (and many do not). Kennel owners should contact their own local authority if they are in any doubt as to regulations that apply to them and indeed, whether they follow the CIEH model or not.

We would encourage pet owners to contact their local authority direct on these matters if they are unsure about their local kennel regulations, as some kennels may not have been made aware of any changes to policy to a sufficient level or understanding (from the authorities). And again, whether they follow the CIEH model or not.

The CIEH MLCs do not apply to Scotland, Wales, or Northern Ireland. Although they state that Wales and Northern Ireland may wish to use them as part of their own regulations. But they are under no obligation to do so.

We believe that the CIEH are currently looking at the subject of MLCs for home boarding/pet sitting etc. It is likely that the same (or extremely similar) conditions will be set.

What the MLCs mean

- The MLCs state: *“No liability rests with contributing bodies for the circumstances arising out of the application of conditions contained within the document. The contents of this document will be kept under regular review to ensure that it remains relevant and accurate.”*

This is a disclaimer and an insult to pet and kennel owners. It seems that policy makers are happy to make the rules but take no responsibility for any outcome.

No details are given regarding ‘regular review’ and we question whether this is of a competent nature due to the complexities of, and time to produce (two years), the updated MLCs in the first place.

- **The MLCs state they are in accordance with the Animal Welfare Act 2006**

Some of the regulations may lead to placing boarding establishments in contravention of that act. It is an offence under the Act to cause harm or suffering, which may arise due to unnecessary over-vaccination as promoted in the MLCs.

If an animal is already immune to a viral disease, or a particular vaccine is associated with severe adverse reactions and under investigation with the European Medicines Control Agency, as is the case with MSD’s Lepto 4 vaccine, then an animal may be made to suffer as a result of enforced administration of that vaccine.

- **The MLCs state all dogs boarded at the establishment should wear a collar and tag identifying the name and telephone number of the owner, or have the collar and tag secured immediately outside the kennel unit.**

This would appear to be negligent to state it should only have the owner’s details, when, if the dog is lost (for the vast majority of dogs being boarded) the owners will not be at home when their dog is in kennels. Microchips, even when a dog is scanned (which they are often not), will also not prove of any use if the owner is away for any length of time. It should be recommended that kennels provide a separate tag with the kennel’s details on.

- **The MLCs state: Under The Microchipping of Dogs (England) Regulations 2015 all dogs over the age of 8 weeks in England must be fitted with a microchip, unless a veterinary surgeon has certified (on an approved form) that a dog should not be microchipped for reasons of the animals health.**

It is not an offence to not microchip your dog. The law states that microchipping applies to dogs over 8 weeks of age, and those being transferred to another owner. Any owner with a dog who hasn’t been microchipped is not under any obligation to do so unless ownership of the dog is transferred to another person/party. Pet owners or kennels are under no obligation to insist on dogs being microchipped.

Regulation 3 of the Microchipping of Dogs (England) Regulations 2015 state: *from April 6, 2016 all dogs older than eight weeks of age, which are not certified working dogs or subject of a veterinary health exemption, must be microchipped.*

“Despite the heading of regulation 3 being “Obligation to microchip dogs”, which is reinforced at 3(1) “every keeper... must ensure that it is microchipped”, and again at regulation 8(1) “the new keeper must... record their full name and address”, the **regulations do not make failure to do so an offence.**

“However, what is an offence, under regulation 8(2) is the transfer of a dog that is not microchipped to a new keeper.

“The explanatory notes accompanying the regulations make it clear a **new** keeper who fails to comply with regulation 8(1), in accordance with regulation 3 would result in the keeper being subject to an enforcement action by an authorised person.

“Regulation 11 lists authorised persons, but, in practical terms, it means a police officer or a dog warden. An authorised person may, if required, serve a notice under regulation 12(a) on a keeper requiring a dog is microchipped within 21 days. Failure to comply with this notice would constitute an offence. The “may” and “if required” of regulation 12(a) confirm it is a discretionary power.

“The legislator’s intentions are clear. The purpose of the regulations is to control and monitor the breeding of puppies and to have a mechanism in place to monitor dogs that have, for one or more reasons, been brought to the attention of the authorities.

“The regulations have not been drafted to make life difficult for the majority of responsible owners who fully intend to look after their dogs and attend to their lifelong welfare needs.”

So the bottom line appears to be that you don’t HAVE to microchip your dogs unless you are involved in the transfer of ownership of a dog. But if a dog warden or police officer serves you with a notice to do it (for example, if your dog gets lost and found), then you’ll get fined if you don’t do as you’re told.

- **The MLCs state: kennels should understand the potential consequences of dogs that have not been adequately vaccinated in terms of the risk to those particular dogs, other dogs and their own insurance.**

Under the Animal Welfare Act, kennels and pet owners should also understand the potential consequences of harmful unnecessary and/or over vaccination, since vaccines are not without harm and the World Small Animal Veterinary Association has called to the end of unnecessary vaccination due to that potential harm. It is the pet owner and kennel’s responsibility to avoid over-vaccination.

With regard to insurance, it is a common misconception that policies are invalid if dogs are not vaccinated. Firstly, pet and kennel owners should clarify this with their insurers. It is advisable to ask specific questions in that regard, and state that your kennel licensing allows dogs to be boarded if:

- a) a certificate is provided by a vet to show a titer test is valid
- b) a letter by a vet is provided to show a vaccine is contraindicated

Another misconception is that insurers still insist on annual vaccination. Again, this needs to be clarified with the insurer, and where three year vaccines have been given, that insurers are aware that these are licensed for that period and giving annual vaccines would not provide any further benefit, but may cause harm.

If your insurance (pet or kennel) does not accept points a) and b) above under their policy, the plain and simple advice is to change insurer (and tell your current insurer, politely, that you are doing so and why).

Pet owners can find suitable policies at insurers such as www.AnimalFriends.org.uk or <http://www.healthy-pets.co.uk/>

For kennel owners:

Cliverton Insurance (who are underwritten by Amlin UK) state:

"As long as kennels/catteries comply with their local authority licensing conditions, then it is up to the individual establishment regarding vaccine policy".

So, the first thing for any boarding establishment is to check with your insurer - do they offer the same cover as Amlin? If you are not getting that cover then switch to Amlin UK, either through your own broker or by contacting Cliverton Insurance on 01328 857921. Other insurers may also offer the same benefits.

- **The MLCs state: Vaccination against kennel cough (infectious tracheobronchitis) should be recommended.**

Vaccination against kennel cough is not mandatory and does not contravene licensing conditions if not administered.

- **The MLCs state: There must be a documented policy for dogs coming to the kennels having protection against appropriate diseases (Occasionally there will be veterinary advice on a specific dog regarding vaccination and its health status and this should be taken into account).**

If vaccination is contraindicated as per veterinary advice as stated, then admittance can still be allowed without demanding vaccination if veterinary advice supports this. A certificate of a titer test is an accepted document as proof of protection (see below).

- **The MLCs state: An up-to-date veterinary vaccination record must be seen to ensure that dogs boarded have current vaccinations against canine parvovirus, canine distemper, infectious canine hepatitis (adenovirus) and, leptospirosis. The date of the most recent vaccination must be recorded preferably with a valid until date.**

Certification from a veterinary surgeon of a recent protective titre test may be accepted in individual cases as evidence of protection against adenovirus, distemper and parvovirus. The certificate must state that it is valid for the period of stay at the kennels. It is the decision of the kennel proprietor whether to accept such a certificate.

Viral Disease

As per the WSAVA (World Small Animal Veterinary Association) current vaccination for the viral diseases (Parvovirus, Distemper, Hepatitis/Adenovirus) should be no more often than every three years. They also state that immunity against those diseases may be for years of the lifetime of the animal.

Titer testing should always be the first choice, as immunity lasts for years or life. To blindly re-vaccinate at any interval puts your dog at risk, but will not provide any benefit if he is already immune.

To do so is in contravention of the Animal Welfare Act – simply because this act aims to reduce suffering.

Leptospirosis

There has been no change in policy from the previous MLCs (1995).

Leptospirosis is a range of over 200 bacterins, most of which are not carried in the vaccine. Long lasting immunity cannot be acquired with this vaccine and, there is no evidence to support mandatory use in the UK, although vaccine manufacturers have tried very hard to build such a case. Official documents state quite clearly that

leptospirosis is rare in the UK, and since the leptospirosis vaccine is specifically mentioned by world experts sitting on the WSAVA VGG as one that carries highest risk, it is arguable that the vaccine represents more of a risk than the disease itself. The WSAVA states that this is a non-core vaccine and should only be used where there is a real and significant risk. Claims that Leptospirosis is endemic in the UK have no validity or evidence to substantiate that claim. There are safety issues with the vaccine (also highlighted at EU level):

http://www.ema.europa.eu/docs/en_GB/document_library/Other/2015/03/WC500183739.pdf

To make a vaccine that is under surveillance mandatory is in direct contravention of the Animal Welfare Act as it encourages harmful unnecessary and over-vaccination to needlessly continue/occur. Nonetheless, this vaccine has been stated as mandatory by the CIEH unless veterinary advice dictates otherwise.

Pet owners should provide veterinary advice that administration of the Leptospirosis vaccine is contraindicated. This evidence may take the form of a letter from their vet stating that their dog should not receive the Leptospirosis vaccine as their dog is not in good health, in accordance with the vaccine data sheet (should not be administered to unhealthy animals). It would also be advisable to state that the dog is free of any disease (including Leptospirosis) and therefore would pose no risk to others. The only other option if you need to board your dog, is for the letter from your vet to state that it is of their qualified opinion as a vet that under the Animal Welfare Act it would be potentially harmful to administer the Leptospirosis vaccine but with no potential benefit. Either way, you would need a vet onside who would agree to do so.

Of course there is an easier way – go to a kennels that doesn't follow the CIEH model and doesn't contravene the Animal Welfare Act by over vaccinating.

Titer Testing

Titer testing is now accepted as valid proof that vaccination is not required against the viral diseases (parvovirus, distemper, hepatitis/adenovirus). Many vets in the UK now have the VacciCheck in-house titer (blood) test kits that provide results while you wait. Prices vary depending on the vet, and range from £30.00 to £60.00. Details about the VacciCheck and participating vets can be found on the PWA website at: www.PetWelfareAlliance.org

Despite the PWA providing evidence and suggested protocols on length requirements for titer testing certificates prior to the MLCs consultation, this was again ignored and no guidance is provided. However, it would make perfect sense for titer testing to be in line with current vaccination protocols – and therefore 'should be no more often than every three years', although likely suitable for years or the lifetime of the animal. Bottom line - ensure you get a certificate from your vet that states it is valid to cover the period of boarding. If you intend to board on a regular basis (even once a year for holidays), then it would be advisable that you talk to your vet to establish the length of validity with a view to the 'no more often than every years' protocol. If your vet is in agreement with the WSAVA protocol they may even put 'valid for life' on the certificate. The minimum valid to date should be no sooner than three years after the date of the last vaccine.

The decision to admit a dog on this basis is stated as being down to the kennel owners. The fact that the British Small Animal Veterinary Association, British Veterinary Association, Chartered Institute of Environmental Health, Dogs Trust, Pet Industry Federation (formerly Pet Care Trust), RSPCA, The Kennel Club, and others,

have stated that titer testing is a valid form of proof of immunity without the need to vaccinate is proof enough that this should be accepted by all kennels.

The option to titer test should not be capable of being vetoed by kennel owners. The science is clear: titer tests are a reliable measure of immunity, which is why the CIEH committee has accepted titer testing as an option.

We encourage all pet owners to find another kennel if their first choice kennel does not accept titer testing as proof of protection.

- **The MLCs state: Primary vaccination courses must be completed at least 2 weeks before boarding.**

Since kennel cough vaccine causes ‘mild’ kennel cough which can be infective, this needs to be at least four weeks. Clarification on vaccine requirements are again non-existent in the MLCs. They do not state:

1. Once immune to viral disease, then immune for years or life.
2. Titer testing is a valid alternative to blind re-vaccination.
3. Any ‘primary’ ‘course’ should not be administered where a dog may already be immune. This would not provide any benefit, but may cause harm.

- **The MLCs state: Homoeopathic vaccination is not acceptable as it will not protect against infectious diseases.**

Firstly of course there is no such thing as ‘homeopathic vaccination’ – homeopathy and vaccination are two entirely different things. The scientific community calls for ‘evidence based medicine’ and refutes homeopathy, yet still adopts unscientific vaccine protocols without evidence. This is double standards and hypocrisy.

However, if a dog is protected by homeopathic means, then that is the choice of the owner. If that dog is titer tested to prove immunity then it is admissible to the kennels. The question of homeopathy is irrelevant in that case.

The fact that homeopathy does not work in the same way as vaccines, in theory, a titer test would not be a useful test for homeopathically protected animals. However, your dog may already be immune regardless, either from a previous vaccine, or have achieved acquired immunity through the environment. So a titer test should always be sought to avoid potentially harmful vaccination where it isn’t even needed or of benefit.

Dogs treated homeopathically and without positive titers, will not be admissible to the kennels. This then falls upon the same reasoning and required vet backing as with the Leptospirosis vaccine, or of course, finding a kennel that doesn’t follow the CIEH model, but does accept homeopathic protection.

- **The MLCs state: In emergency cases, such as admission of unvaccinated dogs because of owner hospitalisation, there must be provision to be able to place these animals in isolation.**

It is well documented that titer testing is a useful tool in kennels (and has been used in rescue organisations) to determine the immune status of a dog prior to boarding. The VacciCheck titer test can be used to get results in around 25 minutes, on site (ie. the test is performed there and then and the blood sample does not have to be sent away

for analysis). For kennels who experience these situations it would be advisable to have a vet who offers this service.

We repeat – to over vaccinate, or to demand unnecessary vaccination is to put that animal at risk of ill-health or death, and with no benefit. This is in contravention of the Animal Welfare Act.

- **The MLCs state warns of zoonotic disease**

They are basically referring to Leptospirosis.

Whereas this is common sense with regard to hygiene, what it fails to state is that the recorded cases of Leptospirosis being spread from animal to human is minimal and in those few cases refers mainly to farm workers. It gives the impression that kennels are a hot bed of disease and threat to human health – this is not the case and there is no evidence to support this.

A far greater threat to humans is the kennel cough vaccine (see below).

- **The MLCs state in various areas that vaccination is a requirement prior to boarding.**

This is a misleading statement.

Vaccination is NOT a requirement prior to boarding as per sections E5.1 and E5.2 of the MLCs, as already covered in these guidance notes above. Rather, evidence of immunity is a requirement, which is why titer testing has been given as an option. It is worth noting that the WSAVA VGG advises that puppies should be vaccinated at 14-16 weeks of age, by which time maternal immunity will probably have waned to allow the successful immunisation of puppies and kittens. Puppies vaccinated before this age, despite vaccination certificates, may still be unprotected.

- **Regarding Leptospirosis the MLCs state: vaccination does not always prevent the shedding of the leptospire (infectious agents) from the urine.**

So the Leptospirosis vaccine does not only have safety issues, and no evidence exists of its need as part of a mass vaccination protocol, but (as we already knew) they admit that it also may not work! How this vaccine is said to be needed as mandatory beggars belief. Totally against the Animal Welfare Act. We would urge all pet owners and kennel owners to seriously consider any use of the Leptospirosis vaccine and follow the options (as previously stated) to avoid this wherever possible.

- **The MLCs recommend the use of the Kennel Cough vaccine**

Vaccination against Kennel Cough is not mandatory. The WSAVA states that kennel cough is not a vaccinatable disease. Unnecessary and over use of vaccines that may cause harm is a contravention of the Animal Welfare Act.

The MLCs state earlier the issue around zoonotic diseases but fail to point out that the kennel cough vaccine itself may cause whooping cough like symptoms in susceptible humans:

It should also be noted that *Bordetella bronchiseptica* is closely related to *Bordetella pertussis* (whooping cough). The *B. bronchiseptica* vaccine is known to shed for up to

four weeks post-administration (see the datasheets), and this shedding can pose a risk to immunocompromised humans (see datasheets). In a significant number of cases, humans are diagnosed with whooping cough when they are in fact infected with shed kennel cough vaccine. See:

[J Med Microbiol](#). 2007 Dec;56(Pt 12):1608-10. Misidentification of *Bordetella bronchiseptica* as *Bordetella pertussis* using a newly described real-time PCR targeting the pertactin gene.

[Clinical Infectious Diseases](#), Volume 37, Issue 3, Pp. 407-414. Human Illness Associated with Use of Veterinary Vaccines

Vaccine company datasheets for *B. Bronchiseptica* (Kennel Cough) advise that, “mild discharges from the eyes and nose can occur from the day after vaccination, sometimes accompanied by sneezing and coughing. In some cases, this may persist for up to four weeks”. The datasheets add that antibiotics need to be given to dogs showing severe signs of vaccine-induced kennel cough. Additionally: “Cats, pigs and unvaccinated dogs may react to the vaccine strains with mild and transient respiratory signs.” This is admission that the vaccine can cause outbreaks.

Because *B. pertussis* and *B. bronchiseptica* are so closely related, a group of scientists seeking to understand why there has been a resurgence of whooping cough in vaccinated people used *B. bronchiseptica* and mice as their model. They found that natural infection induced protection in both the lungs and upper respiratory tract, whereas vaccines conferred protection only in the lungs. The authors suggested that naturally-induced protection is more effective than vaccine-induced protection, and that natural infection could prevent subsequent infections, whereas current vaccines cannot. See:

Different mechanisms of vaccine-induced and infection-induced immunity to *Bordetella bronchiseptica*, *Microbes and Infection* 9 (2007) 442e448

It seems that it would be better to let your normal healthy adult dog ‘risk’ contracting kennel cough and get over it, because nature provides better protection than the vaccine.

The kennel cough vaccine should not be stated as ‘recommended’, as if to make it sound as though it should be used routinely. We would advise pet owners to find a kennel that doesn’t insist on this vaccine, and for kennels to avoid its use.

- **Pet Welfare Alliance comments**

It is with great disappointment and dismay that we find we have had to make the a number of points to clarify the MLCs. Especially that all of these were raised in the PWA submission to the CIEH before their consultation. The PWA suggested (and provided examples of) guidance notes on vaccination. The MLCs go into minute detail on other areas in kennel/boarding and provide guidance – to not do so on vaccination is negligent and totally unnecessary.

The fact that they were aware of these issues means they chose to wilfully ignore situations where dogs may suffer harm, and not provide any guidance whatsoever in those matters.

This is in contravention to the Animal Welfare Act. The CIEH and its consultation members should be ashamed of themselves and are not a fit and proper body for purpose.

They of course have ensured they do not bear any responsibility as they provide their disclaimer (as stated earlier). A total disgrace.

The MLCs provide a 'useful contacts list'. The list includes eight of the eleven members of the consultation group that we have included below marked with a '*'. The PWA would encourage any readers of this report to contact any of the consultation members with any concerns they have as a result of the points raised herein.

www.PetWelfareAlliance.org

CIEH MLC

Useful contacts list

Animal and Plant Health Agency

Woodham Lane

Addlestone

Surrey KT15 3NB

Website:

<https://www.gov.uk/government/organisations/animal-and-plant-health-agency>

Animal Welfare Foundation

7 Mansfield Street, London W1G 9NQ

Tel: 020 7908 6375

Email: bva-awf@bva.co.uk

***British Veterinary Association**

7 Mansfield Street, London W1M 0AT

Tel: 020 7636 6541

Email: bvahq@bva.co.uk

***British Small Animal Veterinary Association**

Woodrow House, 1 Telford Way, Waterwells Business Park, Quedgeley,
Gloucestershire GL2 2AB

Tel: 01452 726700

Website: www.bsava.com

Email: administration@www.bsava.com

***Chartered Institute of Environmental Health**

Chadwick Court, 15 Hatfields, London SE1 8DJ

Tel: 020 7928 6006

Web site: www.cieh.org

City of London Corporation

ARC, Beacon Rd. Heathrow Airport. TW6 3JF

Tel +44 (0)208 745 7894

E-mail: veterinary.harc@cityoflondon.gov.uk

Web site: <http://www.cityoflondon.gov.uk>

Local Government Association

Smith Square, London SW1P 3HZ

Tel: 020 7664 3000

Website: www.local.gov.uk

Email: info@local.gov.uk

Department for Environment, Food and Rural Affairs

Nobel House, 17 Smith Square London SW1P 3JR

Tel: 08459 33 55 77

Website: www.defra.gov.uk

Email: defra.helpline@defra.gsi.gov.uk

***The Dogs Trust**

17 Wakley Street, London EC1V 7RQ

Tel: 0207 837 0006

Website: www.dogstrust.org.uk

Email: info@dogstrust.org.uk

Health and Safety Executive

Website: www.hse.gov.uk

***The Kennel Club**

1-5 Clarges Street, Piccadilly London W1J 8AB

Tel: 0844 463 3980

Web site: www.the-kennel-club.org.uk

***PIF (Pet Industry Federation)**

Unit 1a

Bedford Business Centre

170 Mile Road

Bedford

Mk42 9TW

Tel 01234 273 933

Email Info@petfederation.co.uk

Web site: <http://www.petfederation.co.uk>

Royal College of Veterinary Surgeons

Belgravia House, 62-64 Horseferry Road

London SW1P 2AF

Tel: 020 7222 2001

Email: info@rcvs.org.uk

Website: <http://findavet.rcvs.org.uk>

***The Royal Society for the Prevention of Cruelty to Animals**

Wilberforce Way,

Southwater

Horsham,

West Sussex RH13 9RS

Website: www.rspca.org.uk

***Borough Council of Wellingborough**

Licensing Section

Swanspool House

Doddington Road

Wellingborough
Northamptonshire
NN8 1BP
Email: licensing@wellingborough.gov.uk
Telephone: (01933) 229777