



Franck David
Assistant Clerk to the Public Petitions Committee
TG.01
Scottish Parliament
EH99 1SP

8 July 2010

Dear Franck

CONSIDERATION OF PETITIONS [PE1196](#) and [PE1230](#)

Thank you for asking Advocates for Animals for our views on the study by the University of Bristol and the Royal Veterinary College on the risks of tail injuries in dogs. I hope that the following comments will be of assistance.

The study confirms the evidence cited by Advocates for Animals and the previous Scottish Executive during the progress of the Animal Health and Welfare (Scotland) Bill, in support of a ban on all tail-docking of dogs. The results are also in line with a non-scientific survey undertaken by the BBC Scotland *Landward* programme in 2009, in which four out of five Scottish vets (out of 595 responses) said that they had not seen an increase in tail injuries since the tail-docking ban responded.

We note that one of the Petitioners has stated that the research has established that dogs with docked tails are less likely to sustain tail injuries. We disagree with that analysis. Every puppy that is docked suffers a tail injury. We appreciate that the Petitioner is trying to point out that dogs without tails are less likely to suffer accidental tail injury later in life, but that ignores the fact of the initial injury.

Given that prophylactic docking involves injury to every dog affected, the real question to be answered is whether an intentional 100% early injury rate can be justified on the grounds that it prevents a sufficient number of potential injuries later in life.

In our view, the study confirms that there is no such justification. At an estimated 0.23% per year, the overall weighted risk of tail injuries in dogs in Great Britain was considered very low: the authors observed that "tail injuries requiring treatment in the general dog population of GB could be even rarer than originally thought".

An important conclusion of the study was that approximately 500 dogs would need to be docked in order to prevent one tail injury. In addition to this, however, it must be borne in mind that the injuries surveyed covered a variety of situations, and not just the working dog environment:

- 36.1% (35 cases) of the injuries were caused by the dog knocking its tail against the wall, kennel wall or other household objects;
- 17.5% (17 cases) were from undergrowth or fences during exercise or work;
- 14.4% (14 cases) were due to their tail being caught in a door;
- 15.5% (15 cases) were due to various other causes; and

- 16.5% of cases (16 cases) were due to an unknown cause.

Given that the exemption being sought by the petitioners relates only to outdoor-related activities such as exercise or work (17.5% of the total injuries surveyed), we estimate from these figures that approximately 2,400 puppies would have to be docked in order to prevent tail injury in one working dog.

It may be argued that working dogs require and deserve a greater degree of protection from injury than dogs that lead a less active life. In principle we would agree with that. However, working dogs are placed in situations and environments where they regularly suffer injury, and these injuries are not confined to the tail. The study refers to research by Houlton (2008)¹, covering injuries sustained by working dogs such as: lacerations to the inguinal region, abdomen, face and ears; puncture wounds including stake penetrations of the inguinal region, chest and pharynx; foot injuries, lameness, elbow fractures, ligament injuries and sprains, internal injuries, nostril damage, eye injuries and tail injuries. It would be impossible to protect working dogs from this wide spectrum of injuries by cutting off parts of their bodies, and the same logic must apply to tails.

As far as tail injury was concerned, the study found that being a working dog was not a major risk factor: other factors including breed characteristics and levels of activity of dogs were more important than work *per se*. Breed was an important factor, with English springer spaniels, cocker spaniels, greyhounds, lurchers and whippets all being found to be at higher risk compared with labradors and other retrievers. Of these, only spaniels were traditionally docked: any exemption for working dogs would not provide any additional protection for greyhounds, lurchers or whippets, unless the Petitioners are proposing that they should be included in the definition. Spaniels, with their feathered tails, were thought to be at increased risk of getting caught or tangled in undergrowth, but this could be avoided by trimming of the individual's tail hair, rather than docking the tails of whole litters just after birth.

As we said in our previous response, tail-docking causes pain and injury to young animals. We accept that this has not been the traditional view, particularly among lay people who believe that they have not observed puppies reacting particularly strongly to docking – but there is considerable scientific evidence to support our view. It is not always obvious what an animal feels, and the strength of an animal's feelings is often underestimated (or even occasionally overestimated). If an animal does not react to some event in the same way as a human would do, it is wrong to assume that it feels nothing. An animal that hardly reacts may be feeling much more pain and fear than is obvious from its behaviour. The loss of a tail through docking also removes an important means of balance and communication, so the injury has consequences throughout the dog's life.

We sympathise with the point made by Nanette Milne MSP in Committee to the effect that one injury to a dog is too many and should be avoided. But while it is unrealistic to avoid all accidental injuries to dogs (or humans for that matter), it is entirely realistic to end intentional unnecessary injury from tail-docking.

It is helpful to have this authoritative study now confirm that there is no compelling statistical argument for prophylactic tail docking and we believe that it should settle the argument about what is genuinely in the animals' best interest. The editorial in the *Veterinary Record*, where the study was published, focused not on whether working dog exemptions should be created in Scotland but rather whether the current exemptions in England and Wales could be justified at all.

Yours sincerely



Libby Anderson

¹ JEF Houlton, A survey of gundog lameness and injuries in Great Britain in the shooting seasons 2005/2006 and 2006/2007, *Vet Comp Orthop Traumatol* 2008; 21: 231-237

Policy Director

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