

# Proposed Pet Shop (Licensing) (Scotland) Bill

## Page 1: Introduction

A proposal for a Bill to improve animal welfare by enhancing local authority pet shop licensing powers and updating the licensing system, including in relation to licence conditions, fees and inspections. The consultation runs from 26 March 2018 to 18 June 2018. All those wishing to respond to the consultation are strongly encouraged to enter their responses electronically through this survey. This makes collation of responses much simpler and quicker. However, the option also exists of sending in a separate response (in hard copy or by other electronic means such as e-mail), and details of how to do so are included in the member's consultation document. Questions marked with an asterisk (\*) require an answer. All responses must include a name and contact details. Names will only be published if you give us permission, and contact details are never published – but we may use them to contact you if there is a query about your response. If you do not include a name and/or contact details, we may have to disregard your response. Please note that you must complete the survey in order for your response to be accepted. If you don't wish to complete the survey in a single session, you can choose "Save and Continue later" at any point. Whilst you have the option to skip particular questions, you must continue to the end of the survey and press "Submit" to have your response fully recorded. Please ensure you have read the consultation document before responding to any of the questions that follow. In particular, you should read the information contained in the document about how your response will be handled. The consultation document is available here: [Consultation Document](#) [Privacy Notice](#)

I confirm that I have read and understood the Privacy Notice attached to this consultation which explains how my personal data will be used

## Page 2: About you

Are you responding as an individual or on behalf of an organisation?

on behalf of an organisation

Which of the following best describes you? (If you are a professional or academic, but not in a subject relevant to the consultation, please choose "Member of the public".)

*No Response*

Please select the category which best describes your organisation

Third sector (charitable, campaigning, social enterprise, voluntary, non-profit)

**Optional: You may wish to explain briefly what the organisation does, its experience and expertise in the subject-matter of the consultation, and how the view expressed in the response was arrived at (e.g. whether it is the view of particular office-holders or has been approved by the membership as a whole).** Blue Cross is one of the UK's leading pet charities. Every year we rehome thousands of pet animals through our network of rehoming centres across the UK. In addition, Blue Cross offers free veterinary treatment to pet owners on low and reduced incomes, treating over 27,000 pets each year. Since 2016, Blue Cross has carried out extensive research into the enforcement of pet welfare legislation across Great Britain.

Please choose one of the following:

Please choose one of the following:

I am content for this response to be published and attributed to me or my organisation

Please provide your name or the name of your organisation. This will not be published if you have asked for the response to be anonymous or "not for publication". Otherwise this is how your name/name of your organisation will be published.

Blue Cross

Please provide details of a way in which we can contact you if there are queries regarding your response. Email is preferred but you can also provide a postal address or phone number. We will not publish these details.

## Page 8: Aim and approach

Q1. Which of the following best describes your view of the proposal to strengthen the licensing regime for pet shops in Scotland?

Fully supportive

**Please explain the reasons for your response.**

As an organisation, Blue Cross is fully supportive of the proposal to strengthen the licensing regime for pet shops in Scotland. Currently, licensing of pet shops is governed by the Pet Animals Act 1951 which was implemented in order to "regulate the sale of pet animals" in pet shops (as defined in s.7(1) of the act). Blue Cross believes this Act is no longer fit for purpose as the marketplace has changed dramatically since its implementation 67 years ago. We would like to see a modernised piece of legislation that fits the current pet selling landscape and provides greater clarity to local authorities.

Our key reasons for this are outlined below:

A lack of clarity in the current Act:

Blue Cross believes that the Pet Animals Act 1951 lacks clarity for local authorities which has led to discrepancies and inconsistencies in the way it is applied across Scotland.

- The Act does not specify how often an inspection must be carried out and does not require an inspection of the premises prior to a licence being issued
- There is currently no standardised approach to pet shop inspections and the quality of inspection forms vary significantly between local authorities
- There is no level of competency required by inspectors to undertake the inspection and licensing of pet shops. A Blue Cross survey found that 36% of licensing officers in Great Britain had no training at all on animal welfare
- There is no statutory guidance which outlines welfare needs of animals found in pet shops. Whilst guidance does exist, it is up to individual licensing officers as to whether it is used. A survey in 2016 found that only 51% of licensing offices in the UK used this guidance to base their pet shop licence conditions on
- A lack of statutory guidance can also make it harder for local authorities to impose conditions on a pet shop. Blue Cross research found that there are occasions when licensed pet shops are reissued licences despite there being welfare issues on the property
- Local authorities do not have the power to revoke a pet shop licence
- Current penalties for breaching the Act are too low with fines of no more than £500 and a maximum prison sentence of 3 months. This is unlikely to be a deterrent for individuals potentially making large sums in profit
- The Act makes no specific mention to online sales. As mentioned above, this has meant that many sellers fall through the net and are not licensed which leads to an unfair system where only the most visible are licensed

Q1. Which of the following best describes your view of the proposal to strengthen the licensing regime for pet shops in Scotland?

Lack of consistency:

All of the points raised above have contributed to creating a system that lacks any sort of consistency. This makes it impossible for comparisons to be made regarding the state of animal welfare in pet shops in Scotland or when looking at the effectiveness of local authority enforcement. It is imperative that both these metrics can be assessed in any proposed legislation in order to ensure positive action.

Furthermore, there must be parity between England, Scotland and Wales. Whilst we believe that the devolution of animal welfare to the Scottish Parliament and the Welsh and Northern Irish assemblies has brought many positive changes for animal welfare, we would like to ensure that there is cohesion between the nations. Blue Cross has had a number of concerns with the process that has been adopted by Defra when replacing the Pet Animals Act 1951 in England with the proposed Animal Welfare (Licensing of Activities Involving Animals)(England) Regulations 2018 and would like to see Scotland lead the way with a clear piece of legislation that aims to tackle the issues raised above.

Increase in internet sellers:

Legislation must reflect the needs of the day, and the 67-year-old Act predates the internet. Many sellers no longer have traditional high street premises and may solely trade online from a private premises. Although it has been argued that the act's definition of a pet shop is "sufficiently wide to include the sale of pets online", evidence suggests that the licensing of online sellers relies on the honesty and integrity of those selling pets to come forward and apply for a licence and in the majority of instances, this is simply not happening.

Irresponsible pet sellers often do not come to the attention of local authorities despite having the potential to make significant profits selling animals online. Coupled with this is a lack of investigations by local authorities into premises suspected of needing a licence. Research by the Blue Cross showed that across Scotland, only 31 investigations were made into premises suspected of needing a licence in 2015, averaging 1 investigation per local authority. From more recent research, Blue Cross has found that 40,997 adverts for dogs, cats or rabbits were posted on three classified websites alone in Scotland in 2017. Although a proportion of these ads will be individuals looking to rehome a pet, many are unlicensed sellers.

More must be done to ensure that those making a profit from selling pets – regardless of the scale of the income – are brought into the licensing framework. This is the only way to ensure that potential pet purchasers have some sort of recourse when they buy a sick animal. It is also fairer on more visible licensed premises such as traditional high street pet shops, anyone in the business of selling animals should be subject to the same requirements. It is essential that any new legislation makes specific mention of online sales so it can tackle the large scale of the problem.

Q2. Could the aims of the Bill be better delivered in another way (rather than by the means of a Bill in the Scottish Parliament)?

No

**Please explain the reasons for your response.**

Blue Cross does not believe that the aims of the Bill could be delivered in another way. As there is currently legislation in place which local authorities are responsible for enforcing, we believe that a more streamlined piece of legislation, fit for purpose in a modern age to replace what is in use presently is the most effective way to improve the situation. As mentioned previously, it is important that any accompanying guidance is also statutory. Research has shown that local authorities do not always use the most up-to-date information available, if any, so it is important that this is changed to strengthen any new Bill.

Q3. Under the proposal, pet shop licence fees would be based on a recovery of the costs incurred by local authorities in processing applications and inspecting premises to ensure animal welfare standards are maintained. In your view, which of the following should local authorities do?

Q3. Under the proposal, pet shop licence fees would be based on a recovery of the costs incurred by local authorities in processing applications and inspecting premises to ensure animal welfare standards are maintained. In your view, which of the following should local authorities do?

(c) Differentiate licence fees for pet shops according to other criteria (e.g. shop surface area).

**Please give reasons for your answer. If you have selected option (c) please indicate which criteria you think should be used.**

Blue Cross would like to see licence fees differentiated between pet shops according to other criteria, for example, size of the premises, number of animals on the premises at any one time (this may need further consideration for fish) and / or type of species sold on the premises. A pet shop could be selling any number of potentially complex animals, for example, exotic species require more specialist knowledge than companion animals where there is more widely accepted academic studies into welfare and husbandry. We would expect that an inspection of a premises with exotic species would take longer based on the additional husbandry requirements such as humidity, temperature, lighting etc. We would also expect that a pet shop that has a greater number of animals on site would need a longer inspection in order to assess the welfare conditions of a number of species. Both the expertise needed to inspect these animals as well as the length of inspection based on numbers should be factored into any licence fee to ensure full cost recovery. It is also important that local authorities are able to recover the cost of repeat inspections where welfare issues are identified or investigations are required into premises suspected of needing a licence. While we don't believe that pet shops that meet good / high welfare standards should be penalised, any additional fees should reflect these costs, perhaps on a case by case basis. In a UK wide survey of local authority licensing officers carried out in 2016 by Blue Cross, 48 per cent of officers stated that their department did not receive enough funding to adequately enforce and implement current statutory animal related legislation. Blue Cross believes that it is important to take heed of local authority responses in answer to this question in order to have a better understanding of what they believe works best for them. While, "option C" looks like the most reasonable option to us, the most important thing to us as an animal welfare organisation is to see that the cost of a full and thorough inspection is covered by the licence fee to safeguard animal welfare and provide early intervention where necessary.

Q4. Which of the following best expresses your view of developing statutory licence conditions, building on the current Model conditions for pet vending, that would apply to all pet shops in Scotland?

Fully supportive

**Please give reasons for your answer, including any advantages or disadvantages of the proposal.**

Blue Cross would like to see statutory licence conditions that build on the current Model conditions for pet vending which would apply to all pet shops in Scotland. We believe that the development of statutory licence conditions would greatly enhance local authority powers and understanding of animal welfare and husbandry. The most up-to-date guidance available is the CIEH Model Conditions for Pet Vending Licensing 2013. Currently, only around 50% of licensing officers in the UK use this when inspecting pet shops. Statutory guidance would go some way to ensuring that local authorities have access to relevant information and can set conditions that must be met based on these. It is essential that there are contingencies in place to allow for regular reviews of any guidance, as animal welfare science is constantly evolving. While CIEH conditions may be the most up-to-date, there are elements that are already outdated and could be improved, for example, it has been suggested that guidance on certain husbandry conditions might even contravene the Wildlife and Countryside Act 1981. We believe any review of statutory guidance should be at least every 5 years. If statutory guidance was to be adopted, Blue Cross would like to see the establishment of an expert panel made up of experts including but not limited to, animal welfare organisations, trade associations and veterinary bodies who could assess what guidance is currently out there and ensure any guidance remains relevant. We would also like to see mandatory training for licensing officers to ensure they are best equipped to utilise and enforce any guidance.

Q5. Which of the following best describes your view of banning the sale of puppies and kittens in pet shops?

Partially supportive

Q5. Which of the following best describes your view of banning the sale of puppies and kittens in pet shops?

**Please give reasons for your answer, including any advantages or disadvantages of the proposal.**

Blue Cross believes that puppies and kittens should not be sold in high street pet shops. Blue Cross believes there is sufficient evidence to suggest the welfare needs of puppies cannot be met in a traditional pet shop environment. Dogs and cats have a critical socialisation period between five and 12 weeks of age and they may struggle to cope with life as a pet if they are not introduced to experiences in this time. It is also difficult to meet the health and welfare needs of puppies and kittens in a shop environment due to facilities and staffing. Pet shops may also have purchased animals from dealers rather than direct from the breeder, in some cases, the puppies and kittens may have been separated from their mothers too early which can have detrimental consequences on their long term health and behaviour. A limited number of puppies are currently sold in physical high street premises in the UK. Our research found nine premises were licensed in Scotland to sell puppies however we know that not all of these shops were actively selling puppies. Blue Cross believe all puppies and kittens should be bought from a legitimate breeder or preferably from a rehoming centre. Whilst we believe that a ban on the sale of puppies and kittens in pet shops is enforceable for high street pet shops in Scotland. We believe a ban is harder to enforce with individuals selling online or from private premises as they are less visible and as mentioned above, often not picked up by local authorities. There is also no accurate figure for the number of sellers although we estimate this to be very high. We are aware that Scottish Government are looking at solutions to the growing problems of puppy dealing and trading and we look to seeing their action plan. Blue Cross would like to see one system of registration and licensing for anyone breeding or selling animals through any means: from home breeders to large scale breeding establishments, pet shops and online sellers. We would also like to see the creation of an easily accessible centralised and transparent database of anyone breeding and selling animals. A database would increase accountability by providing greater visibility to the authorities resulting in improved animal welfare and increased consumer power.

Q6. Which of the following best describes your view of pet shop licence applications listing all animal categories they intend to sell, with owners under an obligation to inform the local authority before stocking any new categories?

Fully supportive

**Please give reasons for your answer, including any advantages or disadvantages of the proposal.**

Blue Cross would like to see pet shop licence applications listing all animal categories they intend to sell, with owners under an obligation to inform the local authority before stocking any new categories. There are vast differences in husbandry needs between animal categories, for example, birds and reptiles have very different requirements and this should be taken into account when assessing whether a pet shop is able to stock certain species. This also gives local authorities the opportunity to make their own assessment, based on their historical relationship with the licensed premises as to the suitability of certain animals being sold. We would also like to see mandatory re-inspection of a premises if new species are intended to be sold that vary significantly from what is currently stocked. It is important that the individual carrying out this inspection is knowledgeable about the species to ensure that welfare can be assessed correctly.

Q7. Which of the following best describes your view of mandatory inspections for all pet shops before an initial licence is granted?

Fully supportive

**Please give reasons for your answer, including any advantages or disadvantages of the proposal.**

Blue Cross believes that mandatory inspections for all pet shops before an initial licence is granted is essential to ensure that any animal intended to be sold have their welfare needs met. This gives local authorities the power to address any potential issues ahead of issuing the licence and will hopefully help to ensure that pet shops have a good relationship with their local authority going forward. It should also help to encourage high welfare standards of animals on the premises. We would also like to see mandatory re-inspections in various circumstances including but not limited to: • if the premises intends to stock new species which differ greatly from what is currently stocked • if serious welfare issues are noted at inspection • If complaints are received from members of the public It is not the number of inspections but the quality of inspection that is ultimately the

Q7. Which of the following best describes your view of mandatory inspections for all pet shops before an initial licence is granted?

important factor. We believe that there needs to be more consistency regarding inspections and would like to see a standardised inspection form, held on the Government's website that local authorities are required to use. This should follow specific criteria and should closely follow any statutory guidance. Blue Cross does not believe this to be particularly onerous as it is already in place for local authorities in regards to zoo licensing. For this, the Scottish Government have a dedicated webpage with relevant statutory guidance as well as standardised inspection forms. This makes it much easier for local authorities to understand their responsibilities and allows for consistency.

Q8. Which of the following best describes your view of all local authorities using a standardised approach to conducting and reporting on inspections of pet shops?

Fully supportive

**Please give reasons for your answer, including any advantages or disadvantages of the proposal. Is there any reason why a standardised approach would not be appropriate?**

Blue Cross strongly supports the view that local authorities should use a standardised approach when conducting and reporting on inspections of pet shops. Our research shows that currently there is a distinct lack of consistency in the way local authorities record data which makes it very difficult to build up a national picture. This not only makes it difficult to assess the scale of the pet trade and any associated problems, but also makes it hard to get any insights into the effectiveness of any new legislation. There also appears to be significant disparity in the way inspections are currently conducted and reported. As evidenced in the consultation document, Blue Cross found that inspection reports ranged from between one and ten pages in length, to emails or letters confirming the renewal of a licence. Although this is not always indicative of a badly carried out inspection, it is impossible to provide any sort of detail which would help to give an accurate picture of the standard of welfare in the pet shop at that time. This not only makes it difficult to compare with other pet shops in Scotland, but can also make it hard to establish a true record of a premises, which could lead to problems in the future if welfare issues are ever identified. We believe that a standardised approach would help to bring parity to the application of legislation by local authorities. This will provide clarity for pet shop owners as well as making it easier to get a clear understanding of how licensed premises are doing across Scotland. It would also make it fairer for all pet shops to have a standardised system and could help aid communication between local authorities and pet shops that have more than one premises in Scotland. Long-term, comparable and accurate data will help the Government and local authorities to make meaningful and evidence-based decisions that could positively impact pet welfare.

Q9. Which of the following best describes your view of local authorities using a risk-based assessment and issuing longer-term licences to pet shops that demonstrate a low risk to animal welfare?

Fully supportive

**Please give reasons for your answer, including any advantages or disadvantages of the proposal.**

Blue Cross agrees with the principles behind local authorities using a risk based approach and believe it could reward those establishments that are meeting welfare standards whilst providing an easier framework for ensuring compliance from those that don't. We believe that a risk-based assessment could drive up welfare standards by giving licensed premises something to aspire to. We have seen that this sort of model has worked well in other areas, for example, food hygiene ratings issued by the Food Standards Agency in Scotland and believe that it will also make it easier for consumers to make an informed choice. We would be happy for a risk based approach to include: - A rating system to distinguish the premises with the best standards from those that need improvement - Flexibility of inspection periods which are established based on the ratings - Reduction of licence fees for premises deemed to be of a higher standard (on the basis they need less intervention) - Individual factors such as qualifications of staff, number of animals on the premises, the types of species sold, compliance history or meeting standards higher than those outlined in any statutory guidance - The ability for local authorities to revert to a more structured licensing process / reconsider a licence if the licensee was to change, for example, in the eventuality of a licence holder's death As mentioned previously, we would like to see the creation of an expert panel that could look at how a risk –based approach

Q9. Which of the following best describes your view of local authorities using a risk-based assessment and issuing longer-term licences to pet shops that demonstrate a low risk to animal welfare?

to licensing could work in practice in Scotland. It is important that representatives from local authorities are included to ensure proposed changes are practical.

Q10. Which of the following best describes your view of enabling local authorities to contract other qualified professionals (in addition to their own officers and vets) to carry out and report on pet shop inspections, including qualified officers from other local authorities?

Partially supportive

**Please give reasons for your answer, including any advantages or disadvantages of the proposal.**

Blue Cross recognises that in some local authorities, there is no longer a dedicated Animal Welfare Officer. Premises may sell a range of species with complex and varied needs and it is unrealistic to expect local authority licensing officers to be aware of the requirements for each. Local authorities should be able to have the choice and ability to contract other qualified professionals where required and Blue Cross believes there should be a list drawn up that includes details of experts that would be appropriate if needed. It is important that the list should include relevant specialists for example, a vet who has specialised in livestock may not be best placed to provide advice on rabbits or bird species. In some cases, expertise may also be found outside of the veterinary community. Any list should be available to all local authorities. We also believe it is important for local authorities to share expertise and best practice. The nature of online selling means that often individuals may be selling from various premises and therefore it is vital that local authorities are in communication to ensure that individuals do not slip through the net. However, while we are keen to see more sharing of expertise among local authorities, this should not be seen as a way to save money by reducing in-house expertise. With the current economic climate, we know that many local authorities are forced to reduce their budgets and this can often have a serious impact on those with responsibilities for animal welfare. We believe that it is essential for local authorities to retain individuals with animal welfare expertise to work alongside any contracted qualified professionals.

Q11. Which of the following best describes your view of enabling local authorities to take steps to address non-compliance with licence conditions, giving licensees the opportunity to make improvements before any further action is taken, with the power to revoke a licence as a last resort?

Fully supportive

**Please give reasons for your answer, and any detail you think relevant, including what appropriate intermediate steps could be.**

Blue Cross believes that it is vital that local authorities are empowered to take steps to address non-compliance with licence conditions, giving licensees the opportunity to make improvements before any further action is taken, with the power to revoke a licence as a last resort. The Pet Animals Act 1951 gives local authorities the power to inspect licensed premises, but does not give any instructions on how to deal effectively with non-compliance. We believe that it is essential that local authorities are given clear guidance on how to proceed where problems are identified at inspection or after the license has been granted. This will also give clearer parameters for pet shops to work within. If local authorities are given the power to revoke licences, any legislation must allow for contingency plans to be put in place when a premises has its licence revoked to ensure that any animals removed from a premises have somewhere to go and are not burdensome on local rehoming organisations.

Q12. Which of the following best describes your view of increasing the maximum fine for failing to comply with the legislation, in line with more recent animal welfare legislation?

Fully supportive

Q12. Which of the following best describes your view of increasing the maximum fine for failing to comply with the legislation, in line with more recent animal welfare legislation?

**Please give reasons for your answer, including any advantages or disadvantages of the proposal.**

Blue Cross believes that the current sanctions for breaching the Pet Animals Act 1951 are not strong enough, and that the maximum fine should be raised to be brought in line with more recent animal welfare legislation. The current fine is unlikely to be seen as a strong enough deterrent and should be raised to take into account the potential seriousness of the offence.

Q13. Which of the following best describes your view of placing an obligation on pet shop owners to provide advice to people buying pets?

Fully supportive

**Please give reasons for your answer, including any advantages or disadvantages of the proposal.**

Blue Cross believes that far too many pet owners start out with little or incorrect information on how to provide for the welfare needs of their new animals. According to a survey carried out in January, one in five pet owners didn't receive any information about their pet at the point of sale. Blue Cross carried out research into seller and buyer behaviour of advertisers on classified websites in Scotland. The total number of ads on three classified websites in Scotland was 40,997. Blue Cross analysed a sample of just over 1,800 Scottish adverts and found that a third of cat and dog ads were advertising animals for rehoming, for rabbits this was 54% of the adverts we looked at. Of these, half of the animals in the ads were under a year old. Some of the reasons given for rehoming pets indicated that not enough information was given to the owner when they purchased the animal. For example, one advert was for an 11 week old kitten that did not get on with the older cat in the household. Our survey showed that 78% of owners did not receive any information on the pet's suitability to live with other animals on purchase. We would like to see advice at the point of sale be made a statutory requirement. This would help to ensure that pet owners are more aware of the welfare requirements of their animals and would hopefully lead to less people giving up an animal for avoidable reasons. We believe that this is something that could be worked on by an expert panel to ensure there is agreement across the animal sector

## Page 21: Financial implications

Q14. Taking account of both costs and potential savings, what financial impact would you expect the proposed Bill to have on:

	Significant increase in cost	Some increase in cost	Broadly cost neutral	Some reduction in cost	Significant reduction in cost	Unsure
(a) Local authorities			X			
(b) Pet shop owners			X			
(c) Individuals (including pet owners)						X
(d) Animal welfare organisations				X		

**Please explain the reasons for your responses.**

(A) Local authorities: Broadly cost neutral. Pet shop licensing should be done on a full cost recovery basis. A new, modernised system of licensing of pet sellers would provide opportunities to save money by ensuring



Q14. Taking account of both costs and potential savings, what financial impact would you expect the proposed Bill to have on:

officers are well trained and not reliant on external help and are sharing resources and best practice across Scotland. There will also be more information and resources available to local authorities through statutory guidance and clearer licensing conditions. However, we do not want this to be viewed as a cost saving exercise and any attempts by local authorities and Government to introduce cost saving measures could result in a system that fails to reach its potential to protect animal welfare and the general public. We believe it is important to weigh this up against the desire to save money. (B) Pet shop owners: broadly cost neutral. Blue Cross believes that this will be broadly cost neutral as any risk based approach would ensure that licensing is based on a case by case basis with some pet shop owners benefitting from reduced costs whilst others may have slightly higher but for fair and just reasons (C) Individuals (including pet owners): Unsure Blue Cross is unsure on the financial impact for individuals but believe it will have a positive impact on animal welfare which can only benefit the consumer (D) Animal welfare organisations: Some reduction in cost Blue Cross would hope that animal welfare organisations see less animals abandoned in poor condition if owners are made more aware of husbandry and are buying from a well licensed establishment

Q15. Are there ways in which the Bill could achieve its aim more cost-effectively (e.g. by reducing costs or increasing savings)?

No

**Please explain the reasons for your response**

Blue Cross does not believe the Bill could achieve its aim more cost effectively. We believe the bill put forward is cost effective and will save on local authority burden overall as well as having the potential to have major animal welfare benefits. A clear licensing framework should hopefully improve the situation for all affected, whether human or animal.

## Page 23: Equalities

Q16. What overall impact is the proposed Bill likely to have on equality, taking account of the following protected characteristics (under the Equality Act 2010): race, disability, sex, gender re-assignment, age, religion and belief, sexual orientation, marriage and civil partnership, pregnancy and maternity?

Neutral (neither positive nor negative)

**Please explain the reasons for your response.**

Blue Cross believes this Bill should have a neutral impact on equality as it's aim is to update and improve existing legislation and should not infringe the Equality Act 2010

## Page 24: Sustainability

Q17. Do you consider that the proposed Bill can be delivered sustainably i.e. without having likely future disproportionate economic, social and/or environmental impacts?

Yes

**Please explain the reasons for your response.**

Q17. Do you consider that the proposed Bill can be delivered sustainably i.e. without having likely future disproportionate economic, social and/or environmental impacts?

The Bill aims to modernise existing legislation, Blue Cross believes this makes it more likely to take into account these factors as it will be more relevant to today's society.

## Page 25: General

Q18. Do you have any other comments or suggestions on the proposal?