

Part A - Inspection Plan and Report

Inspector	REDACTED	Date of visit	28 th June 2021		
Establishment	MBR Acres	Purpose	Other		
Location	On site				
Inspection Time	4.5 hours	Advice time	0 hours	Travelling time	8.5 hours (CI); 6 hours (REDACTED)

Part – B ON-SITE INSPECTION NOT FOR RASPS ENTRY

<p>Pre-planning</p> <p>Summarise reason and key objectives for inspection</p>	<p>Background</p> <p>On 23/06/2021, the SoS’s office contacted ASRU regarding report in the Daily Mirror (https://www.mirror.co.uk/news/uk-news/panicked-dogs-bred-factory-farms-24368423) published 22/06/2021. The article relates to the use and treatment of dogs at the establishment MBR Acres, Huntingdon as well as a broader discussion of the use of dogs in toxicity studies in the UK. The article contains images and a video (filmed by the group Stop Animal Cruelty Huntingdon) of dogs being handled and transported in groups in cages across the site at MBR Acres and being loaded whilst in individual crates for shipping into a van. The video also contains footage of animals being lifted into the transport cages.</p> <p>With respect to the specific establishment, the report suggests that the dogs being bred, kept and supplied from the site are subject to:</p> <ul style="list-style-type: none"> - overcrowding in the transport trolleys - inappropriate handling (particularly scruffing of the animals) - whimpering and distress amongst animals <p>An unannounced inspection was undertaken on the 28/06/21 to investigate any potential breaches of ASPA and/or the Conditions relating to transport and handling procedures, to assess the condition and welfare of the animals held at the establishment and the condition and compliance of the facilities with ASPA and the CoP .</p> <p>Key objectives for the inspection:</p> <ol style="list-style-type: none"> 1) Relating to the specific points raised in the press article: <ul style="list-style-type: none"> - Handling procedures, SOPs and training of staff in these procedures
--	--

	<ul style="list-style-type: none"> - Transport procedures, SOPs and training of staff in these processes (with view to ensuring compliance with PEL SC4(6). - Compliance with PEL SC5 - Condition of the animals held at the establishment. <p>2) Assessment of the facility compliance with PEL SC 4 and the Code of Practice, with particular focus on buildings REDACTED and REDACTED (showing signs of wear and tear at last on-site inspection and, in the case of REDACTED, reduced provision of enrichment)</p> <p>3) To determine compliance with ASPA and Conditions relating to the use of special species (dogs)</p> <p>4) To inspect specific themes of known high risk of non-compliance with ASPA and the conditions (based on the non-compliance data held in ASRU. Specifically, evidence of an effective training and competency process with documentation and records, processes in place for prevention of unauthorised procedures, processes in place for and evidence of effective provision of food and water).</p> <p>To achieve these objectives, the inspection of the establishment consisted of the following actions:</p> <p>1) Inspection of handling and transport procedures.</p> <p>2) Inspection of all areas holding animals.</p> <p>3) Inspection of the following documentation:</p> <ul style="list-style-type: none"> - SOPs/processes relating to transport and handling. - SOPs/processes relating to ensuring provision of food and water. - Training SOPs/DOPs and training records of staff in transport and handling procedures. - Individual history files. - Recording of and process for re-homing. <p>4) Interviews of key personnel, specifically in relation to:</p> <ul style="list-style-type: none"> - Assessment of understanding of processes for transport and handling procedures. - Processes and understanding processes in place for prevention of unauthorised procedures. - Process and understanding of process for the assessment of suitability of animals for re-use.
	Objectives require on-site inspection of animals and all areas of the establishment currently holding animals.

Category	Rating	Details	Actions	Responsibility	Status/ Date due
Facilities	Compliant	<p>Specific areas of concern relating to the public interest in MBR Acres were inspected. These were:</p> <p>Transport off site. The processes and equipment were compliant with PEL SC4 (4) and (6). Transport crates were inspected, although no animals were being transported off site on the day. Travel crates were well maintained and clean. REDACTED described process for movement into crates (also see later finding under leadership and communications below), placement in transport van and checking of securing of crates within the van. The relevant SOPs were inspected (see finding below). Vans are air conditioned but provided by the transport company so no inspection could be performed of the vans themselves as no animals were being transported off-site on the inspection day.</p> <p>Transport around site. The processes and equipment were compliant with PEL SC4 (4) and (6). Four transport trolleys were inspected, one of which was outside and in relatively poor condition (chipped paint, rusting in some areas). REDACTED stated that this was out of use. Was advised to remove from site. Other trolleys were in good working order. SOPs for transport and handling were inspected. The numbers of animals permitted for transport in a single trolley varies by weight and size of the animal, but this was clearly stated in the SOP and the stocking density is such that all animals in the trolley are always able to place 4 feet on the floor. Animals are only in the trolleys for brief periods of time for transport around site. No animals are left unattended in the trolleys. Animals were observed in a transport trolley in Building REDACTED. Stocking density was appropriate</p>			

		<p>and there was no evidence of distress amongst the dogs in the trolley.</p> <p>Handling. Handling of animals by 5 members of staff was observed. All handling was performed competently, calmly and carefully. The SOP for handling was inspected. This clearly detailed appropriate handling process for all life stages of animal housed at the establishment. Importance of calm and careful handling emphasised throughout. Some scruffing (with support under chest) detailed for adult (non-pregnant) animals, but this is appropriate in the context of the age and type of animal.</p> <p>Whimpering and distress amongst the animals. Over 1000 animals were observed. Except for one bitch with a litter and very young pups (which were sleeping), all animals observed were bright, alert and responsive and at the front of their cages wagging their tails. There was no evidence of distress amongst the animals. There was a high level of noise due to dogs barking at the front of their cages. In the context of their other behaviours, there was no evidence to suggest that this was due to distress.</p>			
Facilities	Compliant	<p>All areas currently holding animals were inspected. General points were:</p> <ul style="list-style-type: none"> - There was no evidence of breaches in ASPA or Conditions or CoP in relation to the facilities. - No animals were individually housed except for the dams with litters (no other adult dogs in these cages), - All cages were full height (>2m), all >2-3mx4-6m. Stocking density was within CoP requirements (Section 2.1 and 2.2 of CoP). No cages had outdoor access with the exception of two with access to the outdoor play area. 		Choose an item.	Choose an item. Date Due

		<ul style="list-style-type: none">- Enrichment: suspended tunnels, suspended toys were provided in all cages, including in Building REDACTED (in which provision of enrichment was highlighted as a low-level concern at inspection in Nov 2020), in line with (non-mandatory) CoP section 4.6.1.- Play pens with additional toys, sizzle nest, platforms and climbing frames were available (two outdoors), dogs spend variable amounts of time in them depending on current stock levels and staff workload (between 30 mins and 4 hrs/week).- All areas were clean, bedding (Lignocel) present in cages, shredded paper provided for bedding in plastic dog beds (1/cage). Compliant with PEL SC4(1).- Food was provided in hoppers, filled daily. Water provided by an automatic watering system. Bowls of water provided on the floor for pups up to 3 weeks of age. Mash provided where required (e.g. small pups, dams that had required veterinary treatment). Compliant with PEL SC4 (3).- Day books were completed and up to date for every area, providing evidence of compliance with PEL SC4(5) and SC5. These provided clear, documented daily information on provision of food and water, check of water flow from automatic watering system valves, washing of bowls and hoppers, cleaning of cages and corridors, bedding change, individual animal husbandry and/or veterinary requirements, daily temperature reading.- All inspected cages had labels associated with them providing details of dogs housed there using a barcode system. Barcodes are tied to the			
--	--	---	--	--	--

		<p>animal microchips with all animal data held on the 'Cedric' animal tracking system.</p> <ul style="list-style-type: none">- Several areas had wear and tear in the fabric of the rooms, particularly relating to chipping and erosion of the painted concrete floors. However, this would not be expected to impact on the welfare of the animals housed there and there is a clear refurbishment plan in place (discussed in detail with REDACTED) to address this issue. <p>Areas inspected (with PELh REDACTED and NTCO REDACTED) were:</p> <p>Building REDACTED – Contains dams with pups and animals in late stage of pregnancy. Back third of the cage had underfloor heating in some areas, heat lamps provided in other areas, beds with young pups in were on the heated area/under the heat lamps. REDACTED and REDACTED provided clear overview of daily tasks and processes in the facility. REDACTED provided a detailed account of monitoring immediately pre, during and post whelping, provision for veterinary care (NVS is on site every day) and care/husbandry of new litters and dams. Discussed care and procedure for checking of dams with REDACTED (NACWO), particularly in relation to mastitis prevention and treatment (which appears more prevalent in the Marshall strain of beagle). REDACTED was able to provide a clear, detailed overview of the process and relevant documentation.</p> <p>Building REDACTED – Contains pregnant females and stud males. Mating pen separate, within female housing area. Stud males housed in two large separate pens with additional enrichment (including climbing frame).</p>			
--	--	---	--	--	--

		<p>Building REDACTED – Housing bitches post-whelping or being held prior to mating.</p> <p>Building REDACTED – animals being held prior to sale. All females, bar one pen of males (at the far end of the building). Transport trolley in this area was inspected, clean, in good working order, REDCATED described process for placing animals into the trolley and movement around site (documented in SOP described below).</p> <p>Building REDACTED – Included in the planned refurbishment schedule. Housing dams with pups up to 8 weeks of age and pups beyond 8 weeks (without dams).</p> <p>Building REDACTED – Included in the planned refurbishment schedule. Currently empty.</p> <p>Building REDACTED – Housing dams with pups.</p> <p>Building REDACTED – Housing pups >8 weeks of age.</p> <p>Building REDACTED – Animals being held prior to sale. Larger fly burden in this area, possibly due to only two ‘zappers’ present. Highlighted to REDACTED and REDACTED and discussed in context of refurbishment (provision for addition of more fly control post-refurbishment). Access to outdoor pen from one of the cages in this area.</p> <p>Building REDACTED – Animals being held prior to sale, some awaiting transport to clients. This area is newly refurbished. High quality finishes for walls (Whiterock cladding), good drainage, ‘office-style’ ceilings (which cannot be power washed but needed to reduce reverberation in the building – solid ceilings would not</p>			
--	--	---	--	--	--

		<p>provide this). Housing contains ramps up to waist-height doors, allowing closer interaction of dogs with technicians. These were being well-used by the animals. Access to the outdoor pens was available for one cage of animals in this building.</p> <p>Surgery area - containing separate prep, surgery and recovery areas. REDCATED (NACWO) provided overview of activities in this area (primarily bleeding under terminal anaesthesia (authorised in the project licence) caesarean sections and castrates). The area was compliant with CoP requirements for rooms used for surgery (both mandated and advisory) No procedures were being conducted on the day of inspection</p> <p>Building REDACTED– this is the next area scheduled for refurbishment. Containing dogs being held prior to sale.</p> <p>Building REDACTED – access requiring additional PPE and boot dip: dogs being held here are due to be transported to buyer this week.</p>			
Staffing: Levels, quality, monitoring	Compliant	<p>Staffing levels, retention, training and competency (also see next finding relating to training, supervision and competence records) were discussed with REDACTED and REDACTED, particularly in relation to maintenance of compliance with PEL SC4 and 5. Staffing levels are sufficient, as evidenced by the state of the buildings, well curated documentation in the animal areas and observed handling of animals by staff. REDACTED stated that staff retention is good and, with a small team, it is possible to ensure good oversight and effective training of the more inexperienced members of the team by the NACWOs. There is a whistle blower policy and process in place.</p>		Choose an item.	Choose an item. Date Due

		<p>The culture of care for the animals at the establishment appeared very good (see evidenced points above), with staff clearly aware of their roles and clear chains of communication in the event of issues arising being detailed in the animal holding areas. However, whilst there is no evidence for this at present, the stress associated with working under the pressure of the animal protection groups may impact on the staffing levels, staff turnover, staff morale and, in turn, continuing ability to provide the good quality animal care and culture of care that exists in the establishment at present.</p>			
<p>Training, supervision, competence</p>	<p>Compliant</p>	<p>In order to assess evidence for compliance with PEL SC4 and 5, the following SOPs were inspected with REDACTED and REDACTED:</p> <p>Handling SOP (W1-MBR-PRD-5). Clear process with images provided for each life stage. Importance of calm and careful handling emphasised throughout. Some scruffing (with support under chest) detailed for adult (non-pregnant) animals, but clearly appropriate for size, temperament, and life stage.</p> <p>Movement SOP (W1-MBR-PRD-18). Clear process detailed with emphasis on calm and careful handling. Clear detail provided in relation to placement into transport trolleys and removal from trolleys.</p> <p>Food and water (W1-MBR-PRD-3). Process for provision and checking clearly detailed. Diet allocation process detailed and considerations for provision of mash and water in bowls also provided.</p> <p>Dispatch and Pack (No SOP code): detail provided for preparation of transport crates, checking of animals prior to and at point of packing and check of health records.</p>		<p>Choose an item.</p>	<p>Choose an item. Date Due</p>

		Check and sign off by the NVS clearly detailed as part of the process.			
Training, supervision, competence	Low level concerns	<p>Training and competency records were inspected with REDACTED (NTCO) for compliance with PEL SC5. Records are currently being moved between computer-based systems. Each individual staff member is trained and assessed against specific 'work instruction' and assigned a competence level (1=requiring supervision; 2=requiring partial supervision, 3=can perform unsupervised, 4=capable of training in process). All assessments are signed off and overseen by REDACTED (NTCO) or REDACTED (NACWO). Work instructions include general husbandry tasks (including handling), killing and (where staff hold a PIL) procedures (bleeding only, conscious or under terminal anaesthesia). The majority of killing (referred to in records as Put To Sleep (PTS)) is performed by the NVS as REDACTED is on site daily. However, other members of staff have recorded competency in killing: there is always a member of staff on site in the day with this competency and process for contacting an on-call person with the necessary competence was clearly displayed throughout the establishment, in compliance with PEL SC2.</p>		Choose an item.	Choose an item. Date Due
Leadership & Communications	Low level concerns	<p>The processes for re-homing, re-use and prevention of unauthorised procedures were described in detail by REDACTED and REDACTED with supporting documentation.</p> <p>Rehoming. REDACTED stated that the majority of ex breeders are re-homed. The process is detailed in the relevant SOP and is compliant with ASPA 17A(3).</p> <p>Re-use. The high-level assessment of suitability for re-use was documented in the history file for each animal. This contained detail regarding last use and NVS sign off. The NVS records themselves (required by ASPA S14(3)) were</p>		Choose an item.	Choose an item. Date Due

		<p>not easily accessible to other Named Persons. Therefore, whilst there was no non-compliance with ASPA S14, advice was provided in relation to improved oversight of all steps of the process for assessment of re-use by all Named Persons to reduce risk of failure to comply in this area.</p> <p>Prevention of unauthorised procedures. This is an area of relatively low risk of non-compliance at this establishment as the only procedure performed is blood sampling (conscious or under terminal anaesthesia) and the team of PILhs that performs the procedures consists of only 4 people. Therefore, individuals with PIL authority are clearly identified. Animal individual history files are used to support compliance with PEL SC20 and ASPA 3(b). The PIL training records and certificates are documented, held and accessible in the establishment record system, facilitating compliance with ASPA 3(a).</p>			
Special species	Compliant	<p>Individual history files were provided for inspection to assess compliance with PEL SC9 (1) and (2). Process of provision of individual history files to another establishment or institution outside of ASPA was compliant with PEL SC9(3) and (4).</p> <p>All dogs are weaned at the establishment and none are transferred out of the establishment before 5 months of age, ensuring compliance with PEL SC10(1).</p>		Choose an item.	Choose an item. Date Due

Part E - Procedures witnessed					
Procedure	Number	Species	PILh	PPLh	Note
No regulated procedures were being performed on the day of inspection.					

Person	Role	Notes
REDACTED	PELh	
REDACTED	NACWO, NTCO, PILh	
REDACTED	NACWO	
REDACTED	NACWO, PILh	
REDACTED	Technician	

Part F - POST-ON- SITE VISIT REVIEW (NOT FOR RASPS ENTRY)

<p>To what extent were the objectives achieved during the visit?</p>	<p>There was no evidence found for breaches in either ASPA or the conditions. Animals were bright alert and responsive and there was no evidence seen of distress in any of the animals that were observed. The culture of care at the establishment appears good and staff are engaged and knowledgeable. Clearly documented processes are in place for handling and transport and the training of staff in these was evidenced.</p> <p>Regarding the objectives, the inspection visit allowed all objectives to be met except for the inspection of vehicles used for transport off-site as no animals were being transported on the day of the inspection.</p>
--	---