

**PUBLIC PROTECTION COMMITTEE: 8 February 2010**

**Report of the Chief Strategic Planning and Environment Officer**

**Application for Animal Licence Renewal at Cardiff Reptile Centre, 173 Cowbridge Road West, Cardiff**

**1. Background**

- 1.1 An application for renewal of a Pet Shop Licence has been received from Cardiff Reptile Centre, 173 Cowbridge Road West, Cardiff. The premises have been licensed since 2007 and the existing annual licence, as with all pet shops expired at the end of the year on 31 December 2010.
- 1.2 At the time that the application for renewal was submitted complaints had been received about the premises and investigation and enforcement action were under way which continued into January. The application for renewal was not determined so that these could be concluded and the application placed before the Committee at this meeting. There are concerns about the management of the premises.

**2. Legal Position.**

- 2.1 Persons running a business of selling animals as pets from a premises require a licence from the local authority in order to do so. The purpose of the licence is to protect the welfare of animals and prevent the spread of disease. In particular animals should be properly housed, fed and cared for. The Authority has the duty to determine applications for licences under the provisions of the Pet Animals Act 1951.
- 2.2 The Authority has a standard set of conditions for pet shops. Condition number 16 requires in respect of the staff training and livestock knowledge that:
  - “16.1 No animal should be stocked or sold unless the staff (or at least one member of the staff) is familiar with the care and welfare of the animals stocked and has a recognised qualification or suitable experience.
  - 16.2 In respect of new applications (not renewals), at least one member of staff working at the licensed premises must hold the City and Guilds Pet Store Management Certificate, or some other appropriate qualification, or must be in the course of training, and obtain the qualification within two years of the licence being granted.
  - 16.3 The licensee must formulate a written training policy for all permanent staff, and will be required to demonstrate that systematic training is carried out.”

- 2.2 The authority has the right to refuse or grant the application or to impose additional conditions. Any person aggrieved by the refusal or imposition of conditions has the right of appeal to a court of law.

3. **Issues.**

- 2.2 Cardiff Council's Licensing Section received a complaint in October 2010 from a member of the public concerning an injured iguana that was purchased from Cardiff Reptile Centre. The complainant had noticed that the iguana had an injured tail and returned it to the shop. An individual working at the shop known as Guzzeppi Tanti, manipulated the tail and splinted it using cotton buds and a human plaster. The tail subsequently fell off a few days later. Further details of this incident are detailed in the attached report produced by Ilaria Agostini-Green attached as Appendix A.

- 2.3 The complaint was investigated by Ilaria Agostini-Green, Licensing Enforcement Officer, along with Animal Welfare Officer Dr Heather Morris. A visit was made to the premises on the 2<sup>nd</sup> November 2010 with specialist reptile vet Mike Jessop whose report is attached as Appendix B. The findings of their visit in relation to breaches of the license conditions and animal welfare issues are as follows:

- Overstocking of livestock
- Insufficient number of staff to manage basic husbandry
- Inadequate & inappropriate water provision
- 3 animals needing immediate vet attention
- Inadequate and inappropriate provision of hides
- Dirty enclosures and strong ammonia smell present
- Different species being housed in the same enclosure
- Livestock purchase register unavailable on 2 occasions
- Livestock register poorly managed and unable to be inspected due to different languages used.

- 2.4 On the 29<sup>th</sup> November 2010, another complaint was made regarding a marmoset monkey being offered for sale at Cardiff Reptile Centre, although they were not licensed to do so. This complaint was confirmed by Trading Standards Officers.

- 2.5 On the 3<sup>rd</sup> December 2010 Guzzeppi Tanti and licence holder Leanne Carter were interviewed under caution by Ilaria Agostini-Green and Heather Morris.

Mr Tanti admitted that he has an advisory role at the pet shop, but he is not able to keep animals or hold a pet shop licence due to a court injunction.

Ms Carter stated that she is not involved in the day to day running of the shop, and only comes in to undertake payrolls and general admin.

Ms Carter admitted not knowing the number or type of animals allowed to be kept on the premises in accordance with the licence. She also admitted the following breaches of licence condition:

- No staff have obtained a City & Guilds Pet Shop Management Certificate
- There is no written training policy for permanent staff.
- She confirmed the marmoset monkey was offered for sale at the premises, although not listed on licence.

- 2.6 On the 3<sup>rd</sup> December 2010 Dr Heather Morris served an Improvement Notice under Section 10 (1) Animal Welfare Act 2006, on Ms Leanne Carter, Appendix E. The notice required a number of improvements in respect of animal welfare issues to be carried out in order to comply with the Act. On the 7<sup>th</sup> December 2010 Dr Morris received a response to the Notice from Chris Newman of the Reptile & Exotic Pet Trade Association (see email attached as Appendix B). Although Mr Newman had not inspected the premises himself, he disputed a number of the requirements of the Notice. He suggested a meeting with Dr Morris, and stated that Ms Carter was happy to comply with any reasonable and proportionate conditions.
- 2.7 On the 7<sup>th</sup> December 2010 Trading Standards Officer visited the premises and observed a large lizard wandering on the shop floor. Another lizard was being retrieved from the toilet area by a member of staff.
- 2.8 Following the issue of the improvement notice the premises was visited on the 7<sup>th</sup> January 2011 by Ilaria Agostini-Green and Trading Standards Officer Jackie Hotchkiss. They found that many improvements had been put in place to improve the animal welfare practices and procedures at the premises. The vast majority of action steps required by the notice have now been complied with, details of which can be found in the report attached as Appendix D produced by Ilaria Agostini-Green on the 10<sup>th</sup> January 2011. In relation to the Pet Shop Licence, the outstanding items that have not been complied with are:
- No member of staff has obtained an appropriate qualification (condition 16.2)
  - No written staff training policy is in place (condition 16.3)

### **3. Summary.**

- 3.1 There have been complaints about the premises. On investigation it has been found that:
- a) The licence holder is not involved in the business on a day to day basis, with the running of the premises being carried out by a person who is ineligible to perform the function.
  - b) Animal welfare standards at the premises have been inadequate.

- c) The licence condition requiring a person working at the premises to have obtained a suitable qualification has not been met, and no written staff training policy is in place.
- 3.2 As a result of the enforcement action taken by the authority the licence holder has taken steps to improve the animal welfare practices and procedures at the premises.
- 3.3 The licence holder has been invited to attend the meeting.

#### **4. Achievability**

This report contains no equality personnel or property implications.

#### **5. Legal Implications**

The legal position appears in Section 2 of this Report.

#### **6. Financial Implications.**

- 6.1 The licensing service is required to be self financing with all expenditure being met from fees and charges which are reviewed annually. The applicant has paid the application fee.

#### **7. Recommendation**

- 7.1 The Committee is requested to determine the application. As the licence holder has not been in day to day control of the premises, has failed to meet the staff training conditions and has permitted poor welfare practices the options in dealing with the matter are:
  - a) Refuse the application for renewal of the Pet Shop Licence;
  - b) Grant the licence subject to additional conditions; or
  - c) Grant the licence as applied for.

**SEAN HANNABY** **10 January 2011**  
**CHIEF STRATEGIC PLANNING AND ENVIRONMENT OFFICER**

This report has been prepared in accordance with procedures approved by Corporate Managers.

Background Papers: None

Our Ref: IAG/LSS/  
Your Ref:

10 December 2010

## **MEMO**

**TO:** THE SENIOR LICENSING OFFICER

**RE: CARDIFF REPTILE CENTRE, 173 COWBRIDGE ROAD WEST, ELY CARDIFF, CF5 5TB**

Upon completing investigations carried out by Animal Welfare Officer Dr Heather Morris and myself into a complaint made by Mr Dean Tugwell and Ms Deborah Hodgson and their subsequent statements (enclosures 1 and 2) against Cardiff Reptile Centre (CRC) after purchasing an iguana, our findings are as follows:

- The iguana presented an injury allegedly caused at the time of sale. Also, at the time of sale, complainants were not offered care sheets or any advice about keeping iguanas. When the complainants noticed the injury and brought the animal back to CRC for advice, they dealt with a man, who was afterwards identified as Guzzeppi Tanti, and who was present at the time of sale. Tanti denied that the injury occurred at the shop and told them the iguana did not need vet attention as it would have been a waste of money. He then proceeded to manipulate the tail of the iguana by lifting it a few times which caused it to bleed. He said it was nothing to worry about as these things happen in the wild and then he splinted the tail with cotton buds and a human plaster. Tanti then advised the complainants to go back in 2 or 3 days so that he could check the iguana's health. However, the iguana's tail came off and it didn't look healthy so the complainants decided to take it to the PDSA contrary to Tanti's advice. They then went back to the pet shop and asked Tanti for some compensation as they've taken the animal to the vet and had incurred some travelling expenses. At this, Tanti responded aggressively but did give the complainants £20 out of his pocket.
- Subsequently the iguana was taken to Budget Vet in Risca and, upon consultation, the tail was diagnosed as necrotic and required to be surgically amputated. X-rays were also taken due to a dark scab on the iguana's hind leg and swelling around the injured area. The x-rays showed a broken leg. This injury, according to the vet, was an old injury, occurring prior to sale, which should have been detected and treated appropriately. Risca vet statement is adduced as Enclosure 3.
- The complainants have also alerted us of possible welfare issues at the shop. A joint visit with Mike Jessop, a specialist reptile vet, Dr Heather Morris and myself was arranged. We visited the premises on 2<sup>nd</sup> November 2010 and a number of welfare issues were identified. Main concerns are listed below. Further details can be found in Mike Jessop's report, adduced as Enclosure 4.
  - Overstocking of livestock both within the shop and in some enclosures and not enough staff to manage basic husbandry (photo 1)
  - Inadequate and inappropriate water provision (photos 2 & 3)
  - 3 animals (a small lizard similar to a bearded dragon, a bosc monitor and a parrot) identified as needing immediate vet attention (photos 4, 5 & 6)
  - Inadequate and inappropriate provision of hides (photo 7)
  - Dirty enclosures and strong ammonia smell in the shop (photos 8 & 9)

- Different species being housed together (photos 10 & 11)

During the inspection the livestock purchase register was requested to be inspected. Tanti said that it was not available; however, it was pointed out that it was one of the conditions to have the register available; the register had been requested previously but again it was not available and the same reason was given. Upon second request the register was produced. The information provided was very poor as invoices were in different languages and therefore could not be properly inspected.

- The bosc monitor and the parrot were taken to Valley Vets by Tanti. The small lizard had died before it could be taken to the vet. The vet diagnosed the bosc monitor with metabolic bone disease which is an indicator of poor husbandry and advised for further x-rays and blood tests to be done. These were declined by Tanti. The vet also suggested certain medications but again Tanti declined saying he had medications at the shop. The vet asked Tanti to call back with details of the medications he had and to update her on the progress of the animals. However, no communication has been made since. Tanti then informed us under PACE interview that the parrot has since died. Valley Vets statement is adduced as Enclosure 5.
- On Monday 29<sup>th</sup> November 2010 another complaint was received alleging a marmoset monkey being sold at CRC. This was confirmed by two Trading Standards (TS) Officers, John Jones and Gareth Jones (GJ), who visited the premises on Wednesday 1<sup>st</sup> December 2010. Primates are not listed on the Pet Shop Licence. Statements of the TS officers are adduced as enclosures 6 and 7.
- The pet shop licence holder, Leanne Carter, as well as Guzzeppi Tanti, were then invited to attend County Hall and sit for a PACE interview on Friday 3<sup>rd</sup> December 2010.
- During the interview Tanti stated he has an advisory role at the pet shop as he can't neither keep animals nor hold a pet shop licence due to a life ban. The life ban followed a prosecution instigated by the RSPCA who charged him with cruelty and neglect on animals. However, Tanti stated he is very experienced and knowledgeable of reptiles and he's the one who deals with the purchasing of the livestock and that he supervises the husbandry of the livestock. He also said there are approximately 3000 animals at the shop.
- During the interview Ms Carter stated she is not involved with the daily running of the shop but only when it comes to payrolls and admin in general. For these reasons she is not present at the shop every day but only when necessary. Furthermore, she stated the following:-
  - No member of staff, to include herself, has completed and obtained a City and Guilds Pet Store Management Certificate, as per condition 16.2 of the pet shop licence
  - There is no written training policy for permanent staff, as per condition 16.3 of the pet shop licence
  - She does not know the number and type of animals allowed to be kept on the premises in accordance with the pet shop licence
  - She named Tanti as the person in the shop who, even though is not a member of staff, has more knowledge and experience on reptiles and supervises the animals' husbandry and welfare. Ms Carter stated she trusts Tanti's opinions.
  - She confirmed the presence of a marmoset monkey on the premises for sale.

On Tuesday 7<sup>th</sup> December 2010 TS Officer Gareth Jones visited CRC. Upon entering the premises he saw a large lizard wondering on the shop floor. The lizard was near the meerkat's enclosure, which is at floor level. The meerkat was showing signs of distress at the presence of the large lizard. There was another large lizard that was retrieved from the toilet area of the shop by a staff member. The free wondering of reptiles in the pet shop in this manner could potentially increase the spread of diseases, cause injury and disturb other animals. Gareth Jones' statement is adduced as enclosure 8 and 9.

As per all of the above, the following numbered pet shop licence conditions (enclosure 10) have been breached:

ACCOMODATIONS: 2.1; 2.4; 2.6; 2.8

EXERCISE FACILITIES: 3.1

REGISTER FOR ANIMALS: 4.1

STOCKING NUMBERS AND DENSITIES: 5.1

HEALTH, DISEASE AND ACCLIMITISATION: 6.1; 6.2; 6.5; 6.7

FOOD AND DRINK: 7.1; 7.2; 7.3; 7.4

PET CARE ADVICE: 15.1; 15.2

STAFF TRAINING AND LIVESTOCK KNOWLEDGE: 16.2; 16.3

My recommendations are to address this matter to the Public Protection Committee in consideration of the renewal of the Pet Shop Licence.

**Ilaria Agostini-Green**  
**Licensing Enforcement Officer**

**Dr Heather Morris**  
**Animal Welfare Officer**

# WITNESS STATEMENT/DATGANIAD TYST

(CJ Act 1967, s.9; MC Act 1980, ss.5A(3) (a) and 5B; Criminal Procedure Rules 2005, Rule 27.1)  
(Deddf CT 1967, a.9; Deddf LIY 1980, au. 5A(3) (a) a 5B, Rheolau Gweithdrefnau Troseddol 2005, rh.27.1)


Statement of **Mike Jessop**

Age if under 18/Oed os o dan 18: **Over 18** (over 18 insert 'over 18'/os yw dros 18 rhwch 'dros 18')

Occupation/Galwedigaeth: **Veterinarian**

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This statement (consisting of 3 pages each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have willfully stated in it anything which I know to be false or do not believe to be true. / Mae'r datganiad hwn (sy'n cynnwys tudalen(nau) a phob un wedi'i llofnodi gennyf) yn wir hyd eithaf fy ngwybodaeth a'm cred ac fe'lgwnaf gan wybod, os caiff ei gyflwyno fel tystiolaeth, y gallaf gael fy erlyn os byddaf o fwriad wedi mynegi unrhyw beth y gwn sy'n anwir neu na chredaf ei fod yn wir.

Signature/ Llofnod:  Date/ Dyddiad: 18<sup>th</sup> November 2010

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I am employed by Ash Veterinary Group, Merthyr Tydfil as a partner and veterinarian.

CV

I am a Veterinarian and a member of the Royal College of Veterinary surgeons. I attended The Royal Veterinary College in London and was qualified in April 1984 with a Bachelor of Veterinary Medicine degree.

I have worked as a veterinarian in companion animal practice since qualifying. I have been a Partner of a 5 veterinarian practice since 1989. My career has been full-time and unbroken since qualifying and has primarily been with dog and cat medicine and surgery with a special interest in exotic pet medicine specifically related to chelonian and reptilian medicine & surgery.

I was an Officer and Director of the British Small Animal Veterinary Association 2002 to 2008, serving as its President for 2006-7 and have lectured at their veterinary courses to both veterinarians and nurses. Further I have been published in their manuals (tortoises) and on-line guides.

I hold memberships of The British Veterinary Association, British Small Animal Veterinary Association, Association of Reptilian & Amphibian Veterinarians, Chelonia Research Foundation, Fish Veterinary Society, Society of Practicing Veterinary Surgeons & British Veterinary Forensic and Law Association. I am currently the UK representative on the Union of European Veterinary Practitioners.



Continuation Statement of / Parhad o Ddalganiad: **Mike Jessop**

I have been invited to advise various institutions at planning stages and am currently working with a research department at Bristol Veterinary School, the Welsh Assembly Government with dog breeding legislation and BVA with new graduate mentoring and support.

I routinely inspect premises for licences for boarding, breeding, pet shop and dangerous wild animals. I have extensive experience in pet shop licencing.

On Tuesday 2<sup>nd</sup> November 2010 I visited Cardiff Reptile Centre, 173 Cowbridge Road West, Cardiff accompanied by Ilaria Agostini-Green and Heather Morris from Cardiff Council. I had been asked to inspect the welfare of the animals kept in the shop. The results of my visit are detailed on the report which I identify and produce as exhibit MJ 1.

Signature/ Llofnod:



Signature witnessed by/ Tystiwyd y llofnod gan:



(CONT/PARHAD)

Page 3 of 3 /Tudalen o

Continuation Statement of / Parhad o Ddalganiad: **Mike Jessop**

Home address: \_\_\_\_\_

Home telephone No: \_\_\_\_\_ Business telephone No: \_\_\_\_\_

Occupation: \_\_\_\_\_Veterinarian\_\_\_\_\_ Date of Birth: \_\_\_\_\_

**Dates to be avoided. Delete dates of non-availability of witness**

Month of: Jan 2011							Month of: Feb 2011							Month of: Mar 2011						
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Month of: Apr 2011							Month of: May 2011							Month of: June 2011						
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Contact point if different from above: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone No. \_\_\_\_\_

STATEMENT TAKEN BY (print name): \_\_\_\_\_



## VETERINARY GROUP

Mike Jessop BVetMed MRCVS  
Nick Hatton BVetMed MRCVS  
Rachel L Thomas BVMS MRCVS

**Main Surgery:**  
Aberdare Rd,  
Georgetown,  
Merthyr Tydfil, Mid Glam.  
CF48 1AT  
Tel. 01685 385117  
Fax. 01685 377840

**Also at:**  
6 Bruce St,  
Mountain Ash,  
Mid Glamorgan.  
CF45 3HF  
Tel. 01443 478800  
Fax. 01443 478242

**Branch Surgery:**  
Heol Maes Y Dre,  
Ystradgynlais,  
Swansea Valley.  
SA9 1HA  
Tel. 01639 844488

Inspection report for Cardiff Reptiles Pet Shop, 173 Cowbridge Road West, Cardiff on 2<sup>nd</sup> November 2010

Report by M Jessop BVetMed MRCVS

Dated 18<sup>th</sup> November 2010, comprising 5 pages and signed on each page

CV

I am a Veterinarian and a member of the Royal College of Veterinary surgeons. I attended The Royal Veterinary College in London and was qualified in April 1984 with a Bachelor of Veterinary Medicine degree.

I have worked as a veterinarian in companion animal practice since qualifying. I have been a Partner of a 5 veterinarian practice since 1989. My career has been full-time and unbroken since qualifying and has primarily been with dog and cat medicine and surgery with a special interest in exotic pet medicine specifically related to chelonian and reptilian medicine & surgery.

I was an Officer and Director of the British Small Animal Veterinary Association 2002 to 2008, serving as its President for 2006-7 and have lectured at their veterinary courses to both veterinarians and nurses. Further I have been published in their manuals (tortoises) and on-line guides.

I hold memberships of The British Veterinary Association, British Small Animal Veterinary Association, Association of Reptilian & Amphibian Veterinarians, Chelonia Research Foundation, Fish Veterinary Society, Society of Practising Veterinary Surgeons & British Veterinary Forensic and Law Association. I am currently the UK representative on the Union of European Veterinary Practitioners.

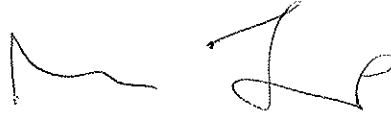
I have been invited to advise various institutions at planning stages and am currently working with a research department at Bristol Veterinary School, the Welsh Assembly Government with dog breeding legislation and BVA with new graduate mentoring and support.

I routinely inspect premises for licences for boarding, breeding, pet shop and dangerous wild animals. I have extensive experience in pet shop licencing.

On Tuesday 2<sup>nd</sup> November 2010 I visited Cardiff Reptile Centre, 173 Cowbridge Road West, Cardiff at the request of Cardiff City Borough Council. I was accompanied by Ilaria Agostini-Green and Heather Morris from Cardiff Council. I had been asked to inspect the welfare of the animals kept in the shop.

I will start this report with a general comment about the market in exotic pets and with reference to the changes in animal welfare requirements following the introduction of the Animal Welfare Act 2006. The keeping of exotic animals is of general concern due to the vast range of species available and the paucity of robust knowledge relevant to their welfare. There is an unacceptably high death rate in exotic pets within their first year of ownership. The overwhelming cause of death is inadequate husbandry provision. Owners are very depended on the point of sale information supplied and it is for this reason that suppliers of such animals should be expected to provide high quality advice. In addition to providing high quality



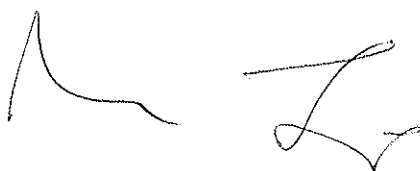


facilities for the animal stock, they should provide examples of the facilities that the new owners will provide.

The female key-holder and a male shop advisor had very defensive and aggressive attitude towards the inspection and seemed unaware of the positive benefits that can be obtained from compliance with requirements. I would advise that they look to their trade body, the Pet Care Trust for concepts on modern pet shop management. They must update their knowledge on the Animal Welfare Act of 2006 and ensure compliance with the documentary data needed for a pet shop licence. The compliance with regulation is primarily focused on animal welfare but the spin off for sale of high quality animals and hence good customer relations should be the prime business interest.

### **The premises at The Cardiff Reptile Centre**

1. In general the environments and facilities were of a standard that could be deemed to be of an acceptable level and as such the licence should continue. However there were a range of concerns that I will list at the end of the report. There were a few areas of major failure on grounds of welfare, these must be urgently addressed. There were several deficiencies that I would recommend are serious enough for the Council to consider adding improvement clauses to the licence. On-going renewal of the licence should be conditional on the introduction of these recommendations. I recommend close monitoring of this facility. With the proposed changes in place, there is every possibility that this facility could become a leading example of reptile care and husbandry.
2. On entering the premises the first impression was of a strong odour of faeces. Many reptile species are carnivorous and therefore produce an especially mal-odourous waste. This increases the requirement for maintaining frequent cleaning protocols. It is my concern that the facilities have too many animals to adequately manage see comments and recommendations later.
3. Water provision. Most facilities had water available. There were some exceptions.
  - 3.1. Vivarium 22 with mixed species had no water.
  - 3.2. The tortoise enclosure labelled 21 and housing mixed species had no water.
  - 3.3. Many of the bearded dragon enclosures lacked water.
  - 3.4. It is acceptable to separately water bath tortoises and to spray mist bearded dragons, but where this management is in operation, a log of times and dates of bathing/spraying must be available. It is preferable to have continuous standing water within the enclosure.
  - 3.5. Some enclosures had standing water but offered in unacceptable containers. The animal must be able to access and remove itself from the water supply. Use of high sided containers is not acceptable.
4. Feeding.
  - 4.1. On inspection there was widespread use of savoy cabbage as the only source of vegetable food. It was only during the inspection that a variety of leaf vegetable appeared. It is important that vegetable feeding is varied and based on individual species requirements.
  - 4.2. As feeding is such a critical component of the husbandry and welfare of the species I would advise that for each species held, there is a dedicated diet sheet for its nutritional requirement. The shop should then follow this advice.
  - 4.3. On questioning, the use of mineral and vitamin supplementation is provided but only on Monday & Fridays. Evidence of the use of supplements should be available for inspection.
  - 4.4. There were many young growing animals in the pet shop and I would expect to see daily use of a good quality supplement provided to these animals on their salad and also to the insects via their feed.
  - 4.5. I was particularly concerned about the quality of the insect prey held by the shop.
    - 4.5.1. In the back room, there was a collection of locust. There was no food or water source for these insects, there were many dead insects in the enclosure. Apart from the welfare issue for these insects, when offered as prey items to the reptiles, they will be of deficient quality. A good prey insect should be well hydrated (i.e. well watered) and well fed. This way it provides high quality nutrition.
    - 4.5.2. There were collections of meal worm and crickets available for sale. Again these had no water or food available.

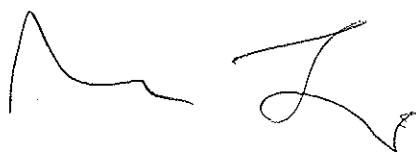


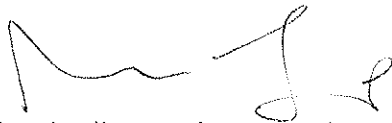


- 4.6. In the bearded dragon enclosures there were supplies of mealworm. These had live mealworm amongst dead mealworm and worm moultings. This suggests that the mealworm bowls are topped up rather than cleaned out. This practice can increase the risk of contamination and disease build up. I would expect to see bearded dragons fed their mealworms in a good quality vegetable mix so that the hunting lizards take a mixed mouthful.
- 4.7. Live crickets in vivarium. There were several examples of small species of lizards, confined with live crickets of an unacceptable size. The crickets have likely been put into the vivarium as food sources and have then survived and grown. Alternatively the crickets may be moving around the shop from vivarium to vivarium. Feeding of live cricket is an acceptable practice for insectivorous reptiles. It is important that the size of the cricket matches the reptile to which it is fed. Obviously small lizards require small crickets. Crickets will attack and feed on reptiles and it is common to encounter injuries so inflicted. Therefore it is imperative that any insects not consumed by the lizards are removed from the vivarium. It is accepted that, from time to time, crickets will escape detection. The widespread levels of crickets at the pet shop suggested that the practice of removal is not rigorously carried out. An example of such injury was seen on a bearded dragon in the back office area that has a serious tail wound.

## 5. Environments

- 5.1. Sales facilities. The fixed vivarium were acceptable although there should be more active cleaning of faeces particularly from carnivorous/insectivorous species. There were several bearded dragon enclosures that needed cleaning
- 5.2. Fixed facilities. There were several enclosures that appeared to be display enclosures only.
  - 5.2.1. An example of poor cleaning with extensive build-up of faeces was the vivarium marked 40. The facility looks effective but has a heavy faeces build up.
  - 5.2.2. The fixtures and fittings used within these enclosures needs to be reviewed for ease of cleaning vs. suitability for the occupant.
  - 5.2.3. Behind the Parrot cage was a raised vivarium housing two monitor species of lizard. These were both mature animals and held in a facility that is too small. They have no roaming space and were, in my opinion, clinically obese.
  - 5.2.4. There was a tropical facility housing various terrapin species with redfoot tortoises and chinese water dragons. The mixing of such species must be reviewed, see later section.
  - 5.2.5. Such fixed facilities need to be critically reviewed with regard to their effectiveness as educational tools for the public and their welfare provision for the occupants.
- 5.3. There should be greater provision of hides for all housed animals. There were many young animals for sale, especially bearded dragons and tortoise species. These animals were housed in groups and so will have dominant animals present. The ability to pursue their natural instinct to hide when stressed must be catered for.
- 5.4. Use of plastic container as temporary accommodation for snakes is acceptable. However, there were large numbers of snakes so housed and the standard of cleanliness is suspect. There should be a limit on the time that animals are contained in such restrictive housing and I would suggest a limit of 10 days is placed on such housing before the snake is allowed more freedom and activity. Containers should be date marked and the stock log should reflect how they have been held prior to sale.
- 5.5. There was a lack of exercise areas for the Bosc monitors in vivarium 16 and these were housed in an unacceptable range of mixed sizes. On questioning, I was advised that they were exercised by allowing free access to the shop floor at night. This seems unlikely because the shop area cannot easily be secured for escapes. To allow free access to the shop would pose a serious biosecurity risk. The vivarium provided insufficient space for this number of Bosc monitors.
- 5.6. Continuous monitoring of the size and numbers of animals per enclosure must be reviewed. This problem was highlighted by the Bosc monitors. As they grow at variable rates, the larger animals should be moved out of the facility.
  - 5.6.1. Closer monitoring and size assessment must take place
  - 5.6.2. The stocking densities of the animals must be reviewed downwards.
- 5.7. Lighting. All reptiles should have exposure to broad spectrum lighting that includes all visible wavelengths of light and especially those in the Ultraviolet wavelengths of UVA and UVB. The intensity and time of exposure of light will vary for the species concerned. For example nocturnal gecko species would be exposed, for short times, to a low level output lamp. Desert species such as sulcata tortoises would require higher intensities for extended times. Each species will require





individual assessment and provision. In all cases there must be an environment set up that allows the animal to self-regulate its exposure by use of sufficient space and appropriate hides. Light bulbs must be changed regularly or monitored for UV output. Records of changes and monitoring must be available for inspection.

- 5.8. Temperatures. There was a marked deficiency in fixed temperature monitoring. Whilst a mobile distance monitor was available there was no evidence of its use. There should be a system of temperature recording in at least 2 positions within each enclosure to show the hottest area and the coolest. Staff should be trained to note these temperatures and act when out of recommended range.
- 5.9. There was an aquatic terrapin enclosure adjacent to the front door. This appeared to be a fixed facility and none of the animals were advertised for sale. On inspection of the facility it was disabled by a power cut. The main living area housed 4 trachemys species slider terrapins. Due to the depth of water due to the power cut, there was insufficient dry land area for these animals with space only for a single terrapin. Only when power was restored and the pump readjusted the water levels, did sufficient dry area return. The enclosure for the animals had insufficient space for the occupants and with such over stocking there is a high risk of dominance bullying and fighting. This is a species that requires a reasonable amount of dry land and the ability to dig. These animals were only provided rocks as a dry land area and as such are restricted from displaying normal behaviours. There was evidence of mating courtship by one of the male terrapins. There were no hide areas of sufficient dimensions to provide escape for animals that are being over dominated. This is a poor example of accommodation for such species. The position adjacent to the door will make it extremely difficult to maintain a warm environment for these species of chelonian. See improvement advice.

## 6. Health & Welfare

- 6.1. A veterinary log must be available to show animals under treatment at the registered veterinary surgeons. With numbers at this level it is inconceivable that no veterinary input and advice on health issues would be required. When asked if any animals were had had recent treatment the reply was that none had been ill for a long time.
  - 6.1.1. On inspection 2 lizards were noted with severe illness.
    - 6.1.1.1. One lizard was being self-medicated any yet showing such severe dehydration that even an inexperienced keeper would be expected to note it unwell. Advice was given to seek urgent veterinary treatment.
    - 6.1.1.2. A monitor lizard with such severe hind limb injury that it was dragging itself around the vivarium. Advice was given to seek urgent veterinary treatment.
    - 6.1.1.3. In the back office, a bearded dragon was noted with a serious injury and infection to its tail end. This animal should have veterinary attention.
    - 6.1.1.4. The African Grey Parrot was unwell. Advice was given to seek urgent veterinary treatment.
    - 6.1.1.5. Three of the four animals were advised to be taken for urgent veterinary attention.
- 6.2. These constitute serious lapses in animal welfare and cannot be tolerated. Any further untreated sickness should be deemed to be a breach of the animal welfare act.
- 6.3. Such a facility should be experienced enough to detect illness at an early stage and there should be a well filled veterinary log of animals treated. It is not an admission of failure but rather evidence of the care and responsibility that the pet shop takes for its stock.


7. Mixing of species is poor husbandry and unacceptable practice. This is of particular concern with the tortoises held. It is well known that mixed species encourage the spread of diseases such as Chelonia Herpes Virus. There should be good biosecurity practices in place and this involves rigorous cleaning of vivaria between occupants. This should be further supported by Single species housing and operator hygiene practices between handling of animals.

## 8. Biosecurity. It was apparent that the understanding of biosecurity is poor.

- 8.1. The use of the only inspected sink for providing animal food preparation & staff beverage making is a serious breach of Health and Safety to both staff and stock.
- 8.2. There was no evidence of a separate area for the cleaning of animal food bowls and other items such as vivarium furniture. Urgent attention should be given to providing three separate areas for cleaning, animal food preparation and staff refreshments.





- 
- 8.3. Protocols for cleaning of vivarium and appropriate staff protection are needed  
8.4. Protocols for handling of animals must be available for inspection.

### Check List of Recommendations

Matters that need to be immediately implemented

Staff protection and training protocols for Disease control

Salmonella  
Food preparation  
Food/Water Bowl Cleaning  
Handling animals

Stock reduction

Improve water availability to all animals. Log times and dates of water supply for those without permanent access

Improved management of stocking densities

Veterinary Log of animals under treatment

Improvement of hides within the vivaria

Animal welfare review with regards to ill animals.

Matters needing urgent implementation

Stock list. This should be a log of each animal showing its arrival, details of any problems noted whilst under care and sale date.

Protocol for new stock arrivals

Diet sheet for each species in stock. These must include details of mineral & vitamin supplementation

Improved husbandry for the insect species kept as prey animals

Critical review of fixed display facilities. Especial attention to the Terrapin Enclosure by the main entrance.

Improved exercise facilities for active species. Especially with reference to the Monitor lizards

Review of the use of plastic containers as long-term housing for snakes

Improved care in housing animals of divergent sizes

Improved provision of Broad spectrum lighting

Improved monitoring of vivarium temperature ranges and documentation of temperature requirements for each species in stock

Cessation of the practice of mixing species within the same enclosure

Recommendation to CCC

The pet shop appears to be over stocked and this is leading to problems with cleaning, overcrowding and insufficient time to observe the stock.

I would advise that restrictions are placed on the numbers of animals kept in the 3 main categories

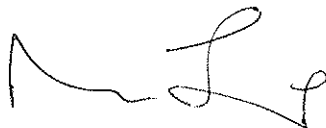
I would suggest that a maximum of 50 lizards are allowed.

I would suggest that a maximum of 40 snakes are allowed

I would suggest that a maximum of 25 tortoises are allowed

I would suggest that a maximum of 25 terrapins (fresh water aquatic chelonian) are allowed

Once all the listed recommendations are in place and there is evidence of improvements in the husbandry of the animals, numbers can be reviewed.



## APPENDIX C

From: Chris Newman  
Sent: 07 December 2010 16:16  
To: Morris, Heather  
Cc: Leanne Cater  
Subject: Cardiff Reptile Centre

Dear Ms Morris,

Re Cardiff Reptile Centre

My name is Chris Newman and I am chairman of the Reptile & Exotic Pet Trade Association, REPTA and I am currently serving on the Working Group reviewing Model Standards for pet shop licensing. By way of introduction I have included a separate document about myself and my background.

I am writing in respect of the Improvement Notice served by yourself on Leanne Carter, proprietor of Cardiff Reptile Centre, (I note this Notice is undated) and I shall also respond in brief to a report written by Mr Mike Jessop veterinary surgeon dated 2nd November 2010.

Turning first to Mr Jessop's report, I must say I find this report at best somewhat disingenuous, he starts (1) by stating "in general the environments and facilities were of a standard that could be deemed to be of an acceptable level and as such the licence continue", then launches into such a catalogue of criticisms that one would have to consider his first statements to be incredulous. It is not my intention to dissect Mr Jessop's report in detail at this point as further investigations are ongoing, but I do wish to raise one point that is very significant and to which I believe Mr Jessop should supply further explanation:

"I will start this report with a general comment about the market in exotic pets and with reference to the changes in animal welfare requirements following the introduction of the Animal Welfare Act 2006. The keeping of exotic animals is of general concern due to the vast range of species available and the paucity of robust knowledge relevant to their welfare. There is an unacceptably high death rate in exotics pets within their first year of ownership."

Mr Jessop appears to display a significant intolerance to the keeping of animals which he deems exotic and the latter part of this statement, in particular, needs to be supported by peer reviewed evidence, not personal opinion. It is generally accepted today that there are more reptiles kept as pets in the UK than there are dogs and such outdated opinion as those expressed by Mr Jessop are unhelpful and biased. I see no useful purpose being served by discussing his report further at this time and I shall turn to the undated Improvement Notice served under Section 10 of the Animal Welfare Act.

There are a number of inaccuracies (including misidentification of animals) and inappropriate or unsuitable recommendations contained in the body of the report, demonstrating significant lack of understanding of requirements of species involved. These issues will be addressed in a further report once preliminary investigations have been completed.

Part 3 of the Improvement Notice outlines the areas in which you state Ms Carter fails to comply with section 9 of the aforementioned Act. I have discussed this in depth and I understand Ms Carter refutes your allegations utterly. Whilst I have not personally



visited Cardiff Reptile Centre, I have had the opportunity to discuss this matter in detail I am inclined to agree with her views, at least on a number of issues.

Turning to the specifics of the Improvement Notice, part 4, clearly Ms Carter is willing to comply with any reasonable requirements made but she is of the view that many of the requirements are neither reasonable or proportionate, an opinion which I have to support in view of the evidence presented to me. It is my understanding that items 1 - 8 have already been complied with, as has item 16. As I am sure you are aware, invertebrates are excluded from the Animal Welfare Act, rendering Item 9 ultra vires. It is also highly inappropriate and detrimental to feed or water livefoods as supplied to shops in the form of pre-packs.

Items 10 - 15, therefore, remain the issues in dispute and I will deal with these individually.

Item 10 - It is not understood what is meant by the term 'critical review'. Please provide more details.

Item 11 - Provide details of what is meant by Improved exercise facilities? I assume there is not the suggestion of including hamster wheels, for example.

Item 12 - All accommodation holding species requiring full spectrum light is already provided. Such lighting is changed at regular intervals and the keeping of a log is disproportionate.

Item 13 - Sufficient monitoring of enclosure temperatures is already in place and it would be unreasonable to keep a written log.

Item 14 - Mixing of appropriate species is fully acceptable and common practice.

Item 15 - Stock reduction. This is rejected as entirely inappropriate, unjustified and restrictive of trade. Currently Cardiff Reptile Centre is licensed to hold:

- 200 frogs
- 30 Tortoises
- 700 snakes/lizards
- 500 fish
- 230 assorted invertebrates [ultra vires]

The demands for drastic stock reduction to 0 amphibians, 0 fish, 50 lizards, 40 snakes, 25 tortoises & 25, terrapins is unwarranted, unacceptable and would render Cardiff Reptile Centre financially unviable.

Clearly there are a number of problems that need to be resolved and it may be helpful to convene a meeting, to be held at a time and date convenient to yourself, in order that the issues may be successfully addressed with all due expediency. I would also wish to re-iterate that Ms Carter is fully co-operative and happy to comply with any conditions which are reasonable and proportionate.

Yours sincerely,

Chris Newman  
Reptile & Exotic Pet Trade Association

Our Ref: IAG/LSS/  
Your Ref:

10 January 2011

**MEMO**

**TO: THE SENIOR LICENSING OFFICER**

**RE: CARDIFF REPTILE CENTRE, 173 COWBRIDGE ROAD WEST, ELY  
CARDIFF, CF5 5TB**

Following my report of 10 December 2010 regarding investigations carried out by Animal Welfare Officer Dr Heather Morris (HM) and myself into a complaint made by Mr Dean Tugwell and Ms Deborah Hodgson and their subsequent statements against Cardiff Reptile Centre (CRC) after purchasing an iguana, I now write to provide an update on the matter.

On 3<sup>rd</sup> December 2010, Ms Leanne Carter, CRC Licence Holder, was issued an Improvement Notice (IN) by HM detailing steps needed to be taken by the end of a specified period. Copy of the IN is adduced as enclosure 1.

On Friday 7<sup>th</sup> January 2011 Trading Standard Officer Jackie Hotchkiss (JH) and myself visited CRC to ascertain that above IN had been complied with. We were greeted by Ms Julie Lovering who assisted us for the entire time of the visit. Our findings, in respect of the IN, are as follows:-

Item 1 – Improved. Daily Log in place reporting daily checks, i.e. feed, clean, treatments, temperature, etc. Advised to improve, as best practice, the data entry, i.e. record the time the checks take place, the type of food being dispensed, the vivarium number (at the time of visit the check sheet indicated the section, being either A, B or C, of the shop being checked) and which member of staff carries out the checks.

Item 2 – Improved. The stocking density was visibly reduced in the detected areas. Particularly, all the male dragons are kept individually. The largest group of lizards was in vivarium no. 40, section C, containing Water Dragon x 20; however the vivarium was of appropriate size.

Item 3 – Notices on display identifying different areas, i.e. animal food preparation area only, staff food preparation only. Advised to create a Staff Training Sheet, to be signed by each member of staff, listing all kind of works carried out, from cleaning the vivaria to exercise the animals, and have each member of staff sign it on completion of all routine tasks.

Item 4 – Vet log is now in place. Advised to indicate the vivarium number relating to the animal under treatment.

Item 5 – Discussed the vet log keeping and the need for members of staff to be aware of the animals being treated, the person who treated them last, what is administered to them, etc. Procedure on disposal of deceased animals was also discussed. The deceased animals are firstly frozen and then collected by the Council.

Item 6 – A new till is in place. As a sale is made the inventory of livestock is automatically adjusted to reflect the sale. The process was shown to us by Julie Lovering. Very good.

Item 7 – A register of suppliers is in place. Mostly made by invoices. A few purchases were private and not enough information about the supplier was provided. Advised Ms Lovering accordingly.

Item 8 – Diet sheet, in the form of little notes, displayed on vivaria with date of last feed. Also a ring binder is in place containing diet sheet for each species in stock. Advised Ms Lovering, as best practice, she needs to keep the notes currently displayed on vivaria in a ring binder and to retain the information for at least 6 months (Ms Lovering admitted those notes, once filled, are thrown away).

Item 9 – Improved. Vivaria with pray insects now offering better husbandry with food and water.

Item 10 – Improved. The terrapin enclosure at entrance has been cleaned and offers more dry rest space.

Item 11 – Animals are being exercised on the premises floor. The floor is then cleaned and disinfected. Advised to add this item on the daily check list.

Item 12 – Improved. Stickers are now displayed on vivaria showing the date of last change. Light bulbs changed to Mega Ray bulbs.

Item 13 – Improved. Temperature checked once a day. Advised, as best practice, to do it twice a day.

Item 14 – Some species still mixed together, i.e. leopard tortoise/giant African spur-thigh tortoise/Indian star tortoise in the same vivarium and a carpet snake with a rainbow snake in the same vivarium. When asked, Ms Lovering said they were advised by their expert, Chris Newman, accordingly and his advice is being adhered to.

Item 15 – When asked about stock reduction, Ms Lovering said it is not possible to run the business with the proposed reduction of livestock.

But they are willing to adopt any suggested measure to comply with the Animal Welfare Act 2006 or with the Licensing requirements; in fact, an extra member of staff has been employed to ensure all the animals and their needs are followed properly.

A count of lizards and snake was taken and the results are as follows:

Lizards – 278

Snakes – 147

Tortoises – 37

The number of snakes and lizards is within the allowed number by the Pet Shop Licence, which is 700 altogether.

The number of tortoises kept on the premises exceeds the number allowed by the licence, which is 30. It must be said that 10 Marginated Tortoises - species listed under Annex A of Convention on International Trade in Endangered Species of Wild

Fauna and Flora (CITES) - were not for sale and kept in a covered up vivarium waiting for the proper paperwork (Article 10 certificate).

JH and myself were satisfied that significant improvements were witnessed and recorded, particularly no overstocking was noticeable.

In view of the above, and in respect of breaches of the Pet Shop Licence listed in my previous report of 10 December 2010, please acknowledge the following:

ACCOMODATIONS: 2.1; 2.4; 2.6; 2.8 - *Improved*

EXERCISE FACILITIES: 3.1 - *The shop floor is used as exercise facility but it's immediately cleaned and disinfected at the end of the exercise session*

REGISTER FOR ANIMALS: 4.1 - *Improved. Advised to add suppliers info when private sales take place*

STOCKING NUMBERS AND DENSITIES: 5.1 – *No visible overstocking*

HEALTH, DISEASE AND ACCLIMITISATION: 6.1; 6.2; 6.5; 6.7 - *All livestock seemed to be in good health. Only one Water Dragon, housed in an unmarked vivarium in section C, was not for sale and was being treated with Bone Aid. Vet Log in place listing ill animals and administered treatment. Also, advised not to let the ill animals exercise in the same area as the healthy ones.*

FOOD AND DRINK: 7.1; 7.2; 7.3; 7.4 - *Improved. Daily checks carried out*

PET CARE ADVICE: 5.1; 15.2 - *Pet care leaflets printed off the computer at the time of sale*

The only items not being complied with are the following:-

STAFF TRAINING AND LIVESTOCK KNOWLEDGE:

16.2 – No member of staff has obtained the City and Guilds Pet Store Management

16.3 - *Advised to formulate Staff Training Sheets*

**Ilaria Agostini-Green**  
**Licensing Enforcement Officer**

## ANIMAL WELFARE ACT 2006, section 10(1)



### IMPROVEMENT NOTICE

#### Part 1

Unique Reference Number:

Date:

A To: (name of person on whom notice is served)  Leanne Carter	C Owner (if different):
B Postal address:- Cardiff Reptile Centre 173 Cowbridge Road West Cardiff CF5 5TB	D Postal address of owner (if known):-

#### Part 2

Under section 9 of the Animal Welfare Act 2006 ("the Act") a person commits an offence if he or she does not take such steps as are reasonable in all the circumstances to ensure that the needs of an animal for which he or she is responsible are met to the extent required by good practice.

For the purposes of the Act, an animal's needs shall be taken to *include*:

- **Its need for a suitable environment**
- **Its need for a suitable diet**
- **Its need to be able to exhibit normal behaviour patterns**
- **Any need it has to be housed with, or apart from, other animals**
- **Its need to be protected from pain, suffering, injury and disease.**

### Part 3

I, ( Heather Morris ), an inspector appointed under section 51 of the Act, am serving this notice on the person named in Box A of Part 1 of this notice, under section 10(1) of the Act.

I am of the opinion that you are failing to comply with section 9(1) of the Act in respect of the animal[s] described below:

Description of animals (including specific location, if appropriate) (species, number, sex, identification, etc):-

All lizards, snakes, tortoises and terrapins in Cardiff Reptile Centre


The respects in which I consider you are failing to comply with section 9(1) of the Act are as follows:-

Overstocked shop has lead to failures to comply with Section 9(1) of the Act. In particular:  
Some Bosc Monitors have limited access to water  
Bearded dragons had no access to standing water  
Some tortoise tanks had no access to standing water  
Some Bosc monitor tanks and bearded dragon tanks were overstocked leading to an inappropriate environment and in inability for them to show normal behaviour  
Most animals had insufficient hides to use  
Sick and/or injured animals had not been taken to the vet  
Fixed vivaria and many of the bearded dragon vivaria were dirty  
Animal food was left in the staff kitchen area – poor disease control  
Terrapin enclosure did not allow the animals to dig thereby not show normal behaviour  
Animals of different sizes were being housed together  
Poor provision of broad spectrum lighting  
Different species were being housed together

## Part 4

I consider that the following steps need to be taken by the end of the period specified in Part 5 in order to comply with section 9(1) of the Act:-

1. Improve water availability to all animals. Animals with free standing water must have easy access to and from the water. A log must be taken for time and dates of water supply for those without permanent access
2. Improved management of stocking densities – stocking densities must be reduced particularly in the Bosc monitor and bearded dragon vivaria, but also any other vivaria
3. Improve staff protection and training protocols for disease control – especially Salmonella, food preparation, food/water bowl cleaning, handling animals. Evidence of this is required
4. A veterinary log of animals under treatment must be kept
5. A review of current policy with regard to ill animals
6. A stock list is required. This should be a log of each animal showing its arrival, details of any problems noted whilst under care and sale date
7. Develop a protocol for new stock arrivals
8. There needs to be a diet sheet for each species in stock. These must include details of mineral and vitamin supplementation
9. Improved husbandry for the insect species kept as prey animals especially their access to food and water
10. Critical review of fixed display species. Especially attention to the terrapin enclosure
11. Improved exercise facilities for active species. Especially with reference to the monitor lizards
12. Improved provision of broad spectrum lighting. A log must be kept of when bulbs have been changed for each vivarium
13. Improved monitoring and recording of vivaria temperature ranges and documentation of temperature requirements for each species in stock
14. Cessation of the practice of mixing species within the same enclosure
15. Stock reduction to the following levels:
  - Maximum of 50 lizards
  - Maximum of 40 snakes
  - Maximum of 25 tortoises
  - Maximum of 25 terrapins

16. Improve the supply register. This needs to be date ordered with suppliers details, addresses and animal details. 

You may carry out work that will achieve the same effect as that described above. If you think there is another equally effective way of complying with the law, you should discuss it with the inspector.

## Part 5

The steps described in Part 4 are to be taken by:

Steps 1-2 must be completed by 1800HRS on Saturday 4<sup>th</sup> December 2010.

Steps 3-5 must be in place by 1800HRS on Thursday 9<sup>th</sup> December 2010.

Steps 6-15 must be completed or in place by 1800HRS on Friday 17<sup>th</sup> December 2010.

If you do not carry out the steps in Part 4, by the date and time above, you may be prosecuted under section 9(1) of the Act. If you are prosecuted you may face a penalty of:

- a fine of up to £5,000 **and/or**
- imprisonment of up to 6 months.

No criminal proceedings for an offence under section 9(1) of the Act will be brought against you before the time specified in this Part of the notice in respect of-

- (i) the non-compliance which gave rise to this notice, or
- (ii) any continuation of that non-compliance.

If the steps specified in this notice are taken by the time specified in this Part of the notice, no criminal proceedings for an offence under section 9(1) of the Act will be brought against you in respect of -

- (i) the non-compliance which gave rise to the notice, or
- (ii) any continuation of that non-compliance before the steps specified in the notice were taken.

Signed:- <u>W. Morris</u>	Official address:-
Name (in block letters):- <u>H. D. MORRIS</u>	<u>COUNTHALL</u>
Date:- <u>03/12/10</u>	<u>ATLANTIC WHARF</u>
Time:- am / pm <u>1800HRS</u>	<u>CARDIFF.</u>
	Tel no:- <u>02920 788347</u>

Signed (receiver): L. Carter

Name (in block letters) LEANNE CARTER