



Consultation Response

FROM THE RSPCA IN WALES

Third Party Sales of Puppies and Kittens

May 2019

QUESTION 1: WHAT DO YOU FEEL ARE THE BIGGEST ISSUES ASSOCIATED WITH THE BREEDING AND SELLING OF:

A) DOGS/PUPPIES

To answer this question the RSPCA has focused on the role of the third party sales in the UK puppy trade as well as the likely welfare issues associated with it.

(i) The role of commercial third party sales in the UK puppy trade

As stated in the Welsh Government consultation document there are no national records of the number of puppies and kittens sold via third-parties. The following information instead describes the role of third party sales in the UK puppy trade.

The annual demand for puppies in the UK is unknown but estimates from the RSPCA, based on polling and the numbers to sustain the current UK dog population, suggest between 700,000 and 1.9 million animals¹. Accurate data is similarly lacking for the sources of puppies to meet this demand. It is estimated that around 70,000 puppies, some 10% of the market, are born to licensed British breeders² with the remainder imported, obtained from rescue organisations or from unlicensed British breeders. Whilst some of the unlicensed British breeders will be selling only one litter a year others will be from large scale commercial breeders. Rescue organisations and pet shops account for a fraction of the market³. The remainder probably come from imported puppies, the trade in which has changed markedly in the past five years. Ireland was the main exporting country prior to 2012 delivering an estimate of between 30,000 and 50,000 puppies annually to Britain. The 2012 change in the UK law, allowing free movement of pets into the UK from the continent, provided the perfect opportunity for puppy dealers to exploit. Non-commercial dog imports rose by 3% but those from the puppy breeding countries of central Europe increased enormously - from Romania by 28 times, Lithuania by five times and Hungary by four times. Some of these are being imported without the proper vaccination and identification controls. It is thought that at least 20,000 puppies are imported legally from the continent and a further 50,000 from Ireland.

¹ RSPCA. Sold a Pup report. 2016. <https://rompetid.ro/files/downloads/utile/PuppyTradeReport-2015.pdf>

² Licensed Dog Breeding in Great Britain, Battersea Dogs and Cats Home, 2015
<http://www.battersea.org.uk/servlet/servlet.FileDownload?file=00Pb000000JnCIGEAN>

³ A Healthier Future for Pedigree Dogs, APGAW, 2009
<http://www.apgaw.org/data/sites/1/PDFs/a-healthier-future-for-pedigree-dogs.pdf>

Case study 1

In June 2015, the RSPCA took into its care 16 puppies illegally imported into Pembroke by an Irish trader after Dyfed Powys Police discovered the puppies being illegally imported from Rosslare harbour. The puppies, mostly Labradors, were aged between nine and 16 weeks old and did not have required documentation for compliance with rabies requirements. The puppies were quarantined and have all been successfully rehomed.

While many puppies are sold to the buyer directly from the puppy's place of birth, a proportion of puppies are sold via third parties including sellers operating legally with a pet shop licence as well as those selling illegally. Unfortunately, exact figures apportioning the different types of sale are not available. However, figures from Ornamental Aquatic Trade Association (OATA) Ltd in 2016⁴, suggest there are 145 pet shop licence holders in Wales with 15 pet shop licence holders permitting sale of puppies. This equates to only 10.3% of pet shop licence holders being permitted to sell puppies and as such they are one of the least commonly sold pets via this method. Nonetheless, based on data from Carr (2016), it is estimated that as many as 80,000 puppies may be sold annually by pet shop licence holders⁵ in the UK; figures specifically for Wales are unavailable.

Although the licence refers to a pet shop, this is misleading as the premises through which puppies are sold vary considerably and most do not resemble what the public would consider a typical pet shop. Analysis of pet shop licence holders in Great Britain by Carr (2016)⁶ found that of the 80 trading pet shop licence holders permitted to sell puppies in 2015:

- 38% were retail premises which may sell puppies exclusively or alongside other species and may be best described as a typical pet shop;
- 21% were dealers who buy in puppies to sell from non-retail premises, a large number of which are residential properties and
- 41% were those who have premises which are also licensed to breed dogs. These licence holders purchase puppies from other breeders to sell alongside puppies they have bred themselves.

In Wales, 9.7% of pet shop licence holders are for private dwellings and specifically within Ceredigion and Carmarthenshire, 50 and 42% of pet shops are licensed for private dwellings⁷.

In the majority of cases highlighted by Carr, the supplier of the puppies was unknown to the licensing Local Authority although she suggests that the majority of puppies sold this way are bred in the UK with less than 12% coming from outside of the UK. If this is the case then the majority of imported puppies must be being sold via other avenues and illegally. Such a route presents even greater welfare issues for the animals and considerably less protection for the buyer.

Based on these data it is clear that there is little robust information and figures on where puppies come from and how they are sold which is compounded by the illegal and hidden element of the trade. There is, however, more understanding around the likely welfare issues affecting dogs in the puppy trade and these are covered below.

(ii) Welfare issues associated with commercial third party sellers of puppies

To date there have been no prospective observational studies comparing the behaviour of puppies purchased via a third party seller to those bought directly from a breeder. Those studies which do exist

⁴ <https://ornamentalfish.org/wp-content/uploads/Pet-Shop-Licensing-Report-2016.pdf>

⁵ Carr, J., 2016. Licensed third party puppy vending in Great Britain.

⁶ *Ibid.*

⁷ <https://ornamentalfish.org/wp-content/uploads/Pet-Shop-Licensing-Report-2016.pdf>

are based on retrospective or cross sectional studies which means it is difficult to attribute a causal relationship between place of birth and problematic behaviour. A recent review⁸ of these studies has, however, highlighted an increased incidence of behaviour problems in puppies bred in high volume commercial breeding establishments and sold via the internet or through retail pet stores compared to dogs from other sources. Moreover, the likelihood for behaviour problems in puppies sold via third parties compared to direct from a breeder becomes particularly apparent when the process by which they are sold is considered in detail.

Puppies sold via commercial third party sellers are exposed to a number of inherently stressful, challenging events which fall within key periods of development and hence are likely to detrimentally impact on behaviour, health and welfare. These events include:

- Potential for abrupt/early separation of puppies from their mothers and littermates before 7-8 weeks of age⁹ which interrupts the natural process of weaning and may inflict acute and/or chronic stress¹⁰.
- Likelihood of multiple journeys especially for those puppies who are imported from Ireland and the Continent¹¹ e.g. from breeder to place of sale to buyer or breeder to broker to place of sale to buyer. Studies which have measured the impact of transportation on dog welfare have shown that transportation is stressful¹² and multiple factors are likely to contribute to this stress including handling, containment, ventilation, temperature, driving style, access to food and water and opportunities for exercise.
- Introduction to new and unfamiliar people as well as environments including vehicles, in some cases broker accommodation, place of sale and the subsequent buyer's residence which will likely result in behaviours associated with fear¹³.
- Introduction and mixing of young and unfamiliar animals which may pose a disease risk especially within the premises of those sellers who also breed their own dogs. As puppies may be separated from their mother and littermates before 7-8 weeks and are typically vaccinated at eight and ten weeks¹⁴, puppies are highly likely to be unprotected against diseases including canine parvovirus and distemper virus.

Case study 2

BBC Scotland¹⁵ investigated the trade in puppies from Ireland to Scotland and reported that around 20% of puppies bought on the internet will die in six months. One of the puppies followed within the programme died from parvovirus within three days of being bought.

⁸ McMillan, F.D., 2017. Behavioral and psychological outcomes for dogs sold as puppies through pet stores and/or born in commercial breeding establishments: Current knowledge and putative causes. *Journal of Veterinary Behavior: Clinical Applications and research*. 19, 14-26.

⁹ Dogs Trust, 2014. *The Puppy Smuggling Scandal. An investigation into the illegal entry of dogs into Great Britain under the Pet Travel Scheme.*

¹⁰ Serpell, J., Duffy, D.L., Jagoe, A., 2016. Becoming a dog: Early experience and the development of behavior. In Serpell, J., (ed) *The Domestic Dog. Its evolution, behavior and interactions with people.* Cambridge University Press. London.

¹¹ Dogs Trust, 2017. *Puppy Smuggling. A tragedy ignored. Investigation into the continuing abuse of the Pet Travel scheme and the illegal entry of dogs into Great Britain.*

¹² Mariti, C., Ricci, E., Mengoli, M., Zilocchi, M., Sighieri, C., & Gazzano, A. (2012). Survey of travel-related problems in dogs. *The Veterinary Record*, 170 (21), 542. <http://doi.org/10.1136/vr.100199>

¹³ Gaultier, E., Bonnafous, L., Vienet-Lagué, D., Falewee, C., Bougrat, L., Lafont-Lecuelle, C., Pageat, P., 2009. Efficacy of dog-appeasing pheromone in reducing behaviours associated with fear of unfamiliar people and new surroundings in newly adopted puppies. *Veterinary Record* 164, 708-714.

¹⁴ RSPCA. 2017. *Vaccinations. Protecting your pet from infectious diseases.*

¹⁵ BBC Scotland. 2015. *The Dog Factory*

The majority of these events will fall during the socialisation period, a period of time, between three and 12-14 weeks of age, where a puppy learns most readily about the characteristics of dogs, other animals and humans¹⁶. A lack of opportunities for - or inappropriate - socialisation during this period is a major risk factor for the development of behavioural disorders later in life, in particular those associated with fear and/or anxiety, including aggression towards unfamiliar people.

Within the information in this response, we have focused on puppies however, the factors inherent with third party sales still apply to some degree when a dog is over six months of age providing evidence that a ban should also be extended to adults. For example, the juvenile period in dogs extends from 12 weeks until the dog is sexually mature, the onset of which varies greatly according to breed with some small breeds reaching puberty at 6 months and larger breeds much later and up to 24 months of age.¹⁷ Although this developmental period has been poorly studied there is anecdotal evidence which suggests experiences during this time can have long term effects on adult behaviour¹⁸.

B) CATS/KITTENS

(i) The role of commercial third party sales in the kitten trade

It is estimated that there are 10.3 million pet cats in the UK¹⁹ but there is very limited data available on the number of cats sold through third party sellers. Figures from Ornamental Aquatic Trade Association (OATA) Ltd in 2016²⁰, suggest there are 145 pet shop licence holders in Wales with 9 pet shop licence holders permitting sale of cats. This equates to 6.2% of pet shop licence holders being permitted to sell cats making them one of the animals least commonly sold through this route. In addition, the 2016 PDSA Animal Wellbeing survey of 4,525 pet owners found that the most commonly reported places from which people acquired their cats were rescue/rehoming centres (34%), family or friend (26%) and from a stray (8%); 3% were acquired from a pet shop²¹. This suggests that third party sales play less of a role in the kitten trade and the reported acquisition behaviour may relate to various factors including the numbers of unplanned litters amongst the owned cat population. Research shows that 70 percent of owners of female cats who have had one or more litters say that the litter was unplanned and that cat owners are largely unaware of the reproductive capacity of their pets²². Furthermore, research identified that owners delay neutering because of the incorrect belief that cats should be allowed to have a litter of kittens²³ - it is possible that these factors result in many cats and kittens being readily available outside of the commercial market. It should be stressed however that currently there is insufficient data to understand the market for selling cats and kittens and the role/significance of third party sellers in it.

¹⁶ Scott, J.P., Fuller, J.L., 1965. Genetics and the Social behavior of the Dog. Chicago, IL:University of Chicago Press.

¹⁷ Serpell, J., Duffy, D.L., Jagoe, A., 2016. Becoming a dog: Early experience and the development of behavior. In Serpell, J., (ed) The Domestic Dog. Its evolution, behavior and interactions with people. Cambridge University Press. London.

¹⁸ Jones, D. 2016. Understanding why guide dogs fail to meet their predicted qualification outcomes. MSc Thesis. University of Nottingham.

¹⁹ PDSA (2017) PDSA Animal Wellbeing Report 2017. Available at:

www.pdsa.org.uk/media/3291/pdsa-paw-report-2017_printable-1.pdf

²⁰ <https://ornamentalfish.org/wp-content/uploads/Pet-Shop-Licensing-Report-2016.pdf>

²¹ PDSA (2016) PDSA Animal Wellbeing Report 2016. Available at:

<https://www.pdsa.org.uk/media/2627/pdsa-paw-report-2016-printable.pdf>

²² Welsh, C.P., Gruffydd-Jones, T.J., Murray, J.K. (2014) Poor owner knowledge of feline reproduction contributes to the high proportion of accidental litters born to UK pet cats. Veterinary Record 174, 118

²³ RSPCA (2014) Tackling the cat crisis. A collaborative approach to neutering. Available at: www.rspca.org.uk/adviceandwelfare/pets/cats/health/neutering

(ii) Welfare issues associated with commercial third party sellers

Although the limited available data suggests that third party sellers are not a key source for those buying kittens, the welfare issues associated with third party sellers would likely be similar to those affecting puppies. For example, early separation of kittens from the queen has a detrimental impact on welfare²⁴.

QUESTION 2: YOUR VIEWS ARE INVITED ON HOW THE PROBLEMS IDENTIFIED IN QUESTION 1 MIGHT BE ADDRESSED BY BANNING COMMERCIAL THIRD PARTY SALES IN WALES:

A) PUPPIES

In working through the evidence for puppies, the RSPCA does not believe that 'appropriate' standards of animal welfare can be preserved when third party sales occur, given that 'appropriate' should be defined as standards that properly safeguard the welfare of animals at all times. For this reason we are supportive of a third party ban on the sale of puppies and kittens. However, it should not be assumed that buying direct from the place in which a puppy or kitten is bred offers greater protection as exposure to stressful events and health risks is reduced. As outlined by McMillan²⁵ there are many factors associated with the breeding environment and outwith third party sales which can influence a puppy's health and welfare and the resulting adult dog's behaviour including: the selection of the breeding stock; the environment in which the brood bitch is kept during pregnancy; the breeding facility into which the puppies are bred and reared and the age at which they are then sold. As such, buying direct from the place in which a puppy is born improves but does not guarantee the welfare of breeding stock and offspring.

Case study 3

Reports of Carmarthenshire licensed breeder inspections were examined by Carr in 2016 and found that establishments with 20 or more breeding bitches were significantly less likely to be rated as excellent or very good in terms of cleanliness of the kennels and to provide other areas for exercise in addition to kennel runs/yards. They were significantly more likely to require improvements to comply with one or more of the licensing conditions.

It is for this reason that in addition to the prohibition of third party sales, the RSPCA welcomes the Welsh Government's commitment to review the Animal Welfare (Breeding of Dogs) (Wales) Regulations 2014 to ensure they meet high standards.

B) KITTENS

See above.

QUESTION 3: ARE THERE ANY MEASURES, OTHER THAN A BAN ON COMMERCIAL THIRD PARTY SALES, THAT COULD ADDRESS THE PROBLEMS IDENTIFIED IN QUESTION 1?

²⁴ Seitz, P.F.D. 1959. Infantile Experience and adult Behavior in Animal Subjects. Psychosomatic Medicine. Journal of Biobehavioral Medicine.

²⁵ McMillan, F.D., 2017. Behavioral and psychological outcomes for dogs sold as puppies through pet stores and/or born in commercial breeding establishments: Current knowledge and putative causes. Journal of Veterinary Behavior: Clinical Applications and research. 19, 14-26.

Robust welfare based standards and enforcement would also tackle the problems associated with large commercial breeding establishments which a third party ban alone would not directly curtail. It is commonly assumed that these establishments exclusively supply third party sellers but this is not always the case. As an example, Carr (2016) found that the two largest breeding establishments in Carmarthenshire (with over 100 breeding bitches), in 2015, not only sold puppies through third parties but the largest establishment also sold direct to the public. The third largest establishment with over 100 breeding bitches sold exclusively to the public. A combination of a ban on third party sales coupled with effectively enforced, robust licensing conditions is essential to address the welfare problems associated with these establishments; the licensing being essential in safeguarding the welfare of the breeding animals in addition to the puppies.

It is the experience of the RSPCA, other animal welfare charities²⁶ and enforcement agencies that a significant number of puppies are being imported in order to meet the demand for puppies by buyers. In theory, the introduction of a third party ban should halt this trade. However, many are already operating illegally and evading current controls so the introduction of new legislation may have little impact, although educational campaigns making the public sufficiently aware that the third party sale of puppies is illegal should have a deterrent effect. The RSPCA maintains its belief that there should be greater surveillance at ports to catch and prosecute puppy dealers who are evading import controls along with tougher sentences to aid greater deterrence.

An age wide ban on third party sales should be considered as an aid to enforcement. Legislation in the area of pet sales can be confusing and often impossible for members of the public to navigate. With more simplistic parameters that are less complex for prospective pet owners to interpret, there may be fewer opportunities for illegal activities. If someone looking to acquire a dog or cat, irrespective of age, appreciates that only a breeder²⁷ or a rescue organisation can legitimately sell or transfer ownership of an animal to them, it could detect illegal activity and help pet owners in advertently avoid contributing to the problem.

The RSPCA has maintained a policy in favour of dog licensing for many decades and it is believed such a measure could play a part in the solution to some of the dog welfare issues the Welsh Government wishes to address. The proposal for dog licences is not to reintroduce what are widely regarded as ineffective licences from the 1980s but instead a new system designed to provide benefits to owners as well as fund some of the big dog problems in society such as strays, attacks and cruelty. The evidence suggests that the public are supportive of the idea, with Wales-specific polling suggesting 82% are in favour²⁸. A robust and easy-to-use system of dog licensing introduced in Wales would increase traceability and provide enforcers with a greater insight into the dog population to ascertain better data and breeding, sales and responsible ownership.

QUESTION 4: DO YOU THINK A BAN WILL HAVE ANY IMPACT ON REHOMING CENTRES? IF SO HOW? TRY AND BE SPECIFIC AND/OR PROVIDE SUPPORTING EVIDENCE

Should a ban be implemented, any dog or puppy would have to be acquired from a rescue centre or from the place at which the puppy was born. This has the potential advantage of increasing the number of

²⁶ Dogs Trust, 2014. The Puppy Smuggling Scandal. An investigation into the illegal entry of dogs into Great Britain under the Pet Travel Scheme. Dogs Trust, 2017. Puppy Smuggling. A tragedy ignored. Investigation into the continuing abuse of the Pet Travel scheme and the illegal entry of dogs into Great Britain.

²⁷ Ideally this would be only registered/licensed breeders to include all such activities, not just those of breeders who operate with three or more breeding bitches

²⁸ All figures, unless otherwise stated, are from YouGov Plc Poll. Total sample size was 1,015 Welsh adults. Fieldwork was undertaken between 19–21 September 2012. The survey was carried out online. The figures have been weighted and are representative of all Welsh adults (aged 18+).

animals rehomed from rescue. Introducing an age wide ban on the sale of dogs via third parties would be further advantageous as this would still allow non commercial sales of adult dogs and the rehoming of adult dogs from charities and rescue centres. Adult dogs are not in short supply compared to puppies from certain breeds. Indeed, it is the adult animals that the RSPCA typically finds more difficult to rehome.

In contrast there is a potential risk to the rehoming sector in introducing a ban with suggestions that third party sellers may pose as rescue organisations to circumvent any ban. Some pet shop licence holders already have a charitable arm such as Pets at Home Support Adoption for Pets²⁹ which sells rescued animals such as rabbits that have been abandoned to rescue organisations. If the charity aims are generic, and those aims are being followed, it would be difficult for the Charity Commission, which regulates charities, to close down the charity even if it was a front to avoid the third party ban. So the Charitable aims of Pets at Home Support Adoption for Pets are to ease the heavy costs of rescuing pets; invest in rehoming programmes and rescue centres; rehome small pets through adoption centres and encourage responsible pet ownership. This charity could be used to sell rescued rabbits as a third party seller. Indeed 25% of this charity's £3.6 million income in 2016 came from sales of rescued pets³⁰. So if a third party ban came into place for rabbits, Pets at Home could divert all sales through their charity, provided they continue to give out grants to other rescue organisations. There is no reason why another rescue charity could not be set up on similar lines for puppies or cats. If the charity is following its aims, the Charity Commission would be limited in what action it could take to close the charity down even if it is a front to avoid the third party ban.

The RSPCA would like to take this opportunity to highlight the need for mandatory regulation of the entire Animal Welfare Establishment (AWE³¹) sector. As a third party sales ban would in effect drive the public to rescue centres it is critical that the establishment operates in accordance with robust welfare standards. This would mean that regardless of whether a dog is acquired from a breeder or rescue, there is assurance that the welfare of all animals has been safeguarded. The RSPCA welcomes the voluntary code of practice for sanctuaries and animal welfare establishments³² which will go some way to providing for the welfare needs of the animals in the establishment's care. However, we recognise there is a risk that only those establishments already operating at a higher standard will adopt the code and therefore we will continue to urge the Government to adopt mandatory regulation of the entire sector.

QUESTION 5: DO YOU THINK A BAN WILL HAVE ANY IMPACT ON LICENSED DOG BREEDERS WHO CURRENTLY SUPPLY THIRD PARTY SELLERS? IF SO HOW? TRY AND BE SPECIFIC AND/OR PROVIDE SUPPORTING EVIDENCE

In the case of puppies, based on the available evidence, a third party sale ban could affect anywhere between 40,000 and 80,000 legal sales via UK pet shop licence holders²³ although this is an estimate as gathering accurate information on the actual number of puppies traded is extremely difficult. Taken with the numbers sold illegally this figure is likely to be substantially higher. However, the extent to which licensed breeders in Wales would be affected is hard to quantify. Carr's analysis in 2016 of Carmarthenshire licensed breeders' does suggest that many licensed breeders will be affected because in 2016 31% of breeders sold exclusively to licensed pet shops while 59% of breeders sold at least some of their puppies this way.

²⁹ <http://www.petsathome.com/shop/en/pets/support-adoption-for-pets>

³⁰ <https://www.supportadoptionforpets.co.uk/annual-report-2015-2016/#fundraising>

³¹ A definition intended to capture rescues, sanctuaries, fostering networks, animal hospitals, rehabilitation centres, etc. Please see the AWE definition provided by the Animal Welfare Network for Wales in the Code of Practice for AWEs

³² Submitted to the Welsh Government by the Animal Welfare Network for Wales of which the RSPCA is a member

Indications are that the market for puppies is being driven by emotion and given this, it is unclear whether this demand will disappear if a third party ban came into force. It might, instead, be met through other routes such as individual buyers travelling to Ireland or France to obtain puppies or continue to be met through existing illegal sources if the ban was not enforced effectively. However a ban could also present an opportunity to increase the desire for rescued animals if the supply of illegal puppies was curtailed.

QUESTION 6: YOUR VIEWS WOULD ALSO BE WELCOME ON THE SCOPE OF ANY BAN ON THIRD PARTY SALES IN WALES. SHOULD IT BE RESTRICTED TO COMMERCIAL SELLERS (THOSE LICENSED UNDER THE ANIMALS ACT 1951) OR ANYONE WISHING TO SELL A PUPPY OR KITTEN? PLEASE PROVIDE EXAMPLE SITUATIONS WHERE YOU FEEL A BAN SHOULD OR SHOULD NOT APPLY.

The RSPCA believes the ban should extend to anyone selling puppies and kittens so that these animals are only available from a rescue or direct from a (preferably licensed only) breeder. If this was not to be the case the RSPCA believes a loophole for others to exploit will be opened. For reasons previously outlined the RSPCA also wishes to see the ban extend to dogs and cats of all ages so that it is easy for members of the public to understand what is or isn't a legitimate sale/transfer of ownership.

QUESTION 7: WE WOULD LIKE TO KNOW YOUR VIEWS ON THE EFFECTS THAT BANNING THIRD PARTY SALES OF PUPPIES AND KITTENS WOULD HAVE ON THE WELSH LANGUAGE, SPECIFICALLY ON OPPORTUNITIES FOR PEOPLE TO USE WELSH AND ON TREATING THE WELSH LANGUAGE NO LESS FAVOURABLY THAN ENGLISH.

The RSPCA has not identified any impacts.

QUESTION 8: WHAT EFFECTS DO YOU THINK THERE WOULD BE? HOW COULD POSITIVE EFFECTS BE INCREASED, OR NEGATIVE EFFECTS BE MITIGATED?

N/a

QUESTION 9: PLEASE ALSO EXPLAIN HOW YOU BELIEVE A CHANGE IN POLICY COULD BE FORMULATED OR CHANGED SO AS TO HAVE POSITIVE EFFECTS OR INCREASED POSITIVE EFFECTS ON OPPORTUNITIES FOR PEOPLE TO USE THE WELSH LANGUAGE AND ON TREATING THE WELSH LANGUAGE NO LESS FAVOURABLY THAN THE ENGLISH LANGUAGE, AND NO ADVERSE EFFECTS ON OPPORTUNITIES FOR PEOPLE TO USE THE WELSH LANGUAGE AND ON TREATING THE WELSH LANGUAGE NO LESS FAVOURABLY THAN THE ENGLISH LANGUAGE.

N/a

QUESTION 10: WE HAVE ASKED A NUMBER OF SPECIFIC QUESTIONS. IF YOU HAVE ANY RELATED ISSUES WHICH WE HAVE NOT SPECIFICALLY ADDRESSED, PLEASE USE THIS SPACE TO REPORT THEM:

N/a