



# ConsultationResponse

FROM THE RSPCA IN WALES

## Consultation response: Welsh Government's Draft National Strategy for Flood and Coastal Erosion Risk Management in Wales

September 2019

QUESTION 1: THE AIM OF THE NATIONAL STRATEGY IS TO 'ENSURE THE RISK TO PEOPLE AND COMMUNITIES FROM FLOODING AND COASTAL EROSION ARE EFFECTIVELY MANAGED.' IS THIS CLEAR AND UNDERSTANDABLE?

No, although RSPCA Cymru believes that the aim of the strategy is relatively clear and understandable, we are disappointed to see that there are no animal or animal welfare references incorporated into the National Strategy for Flood and Coastal Erosion Risk Management.

47% of all households in Wales own at least one animal<sup>1</sup>. It is very likely that many of these households would not leave the premises in an emergency situation without knowledge of what was going to happen to their animals. It is clear from this figure that animal ownership plays a large role in communities across Wales. Indeed, the fate of these animals would likely be a key consideration to people and communities during any spell of flooding or major coastal erosion. Any strategy must be mindful of the fact that there are also hundreds, if not thousands, of animal-related businesses (pet shops, breeders, boarding, zoos, riding schools); animals in sport (horse and greyhound racing); as well as welfare charities who operate multi-species animal sanctuaries. Accordingly, RSPCA Cymru believes that the National Strategy should reflect this by incorporating guidance and advice for pet, equine and farm animal owners, and animal-related businesses, on how to best care for them before, during and after an emergency incident.

By providing such clear guidance, the National Strategy would be ensuring that Wales' RMAs, including Local Authorities, can provide the best possible risk management service to those communities that are facing flood and coastal erosion risk in Wales.

Furthermore, RSPCA Cymru wishes to highlight the importance of communities in areas at risk of flooding, as per the aim of the National Strategy. Communities defines the wider makeup of an area, which incorporates animals alongside their owners. If the National Strategy's aim is to ensure the risk to people and communities is effectively managed it needs to consider the wider implications that flooding can have on communities. The loss of animals can mean the loss of a source of livelihood, while the loss or unknown state of companion animals can be extremely distressing and worrying for the individuals

<sup>1</sup> [National Survey for Wales 2014 - 2015. Pet Welfare](#)

and families involved. This is acknowledged on page 18 of the consultation, which highlights the impacts livestock loss can have on residents of rural communities.

By providing clear advice and guidance on how to care for animals in the case of coastal flooding, the National Strategy will be ensuring that risk to people and communities is effectively managed, whilst also going some way to creating more resilient communities, a key Welsh Government commitment as laid out in the Wellbeing of Future Generations (Wales) Act 2015.<sup>2</sup>

The RSPCA provides [guidance on this issue](#), and further advice on good practice can be located via the RSPCA PawPrints scheme<sup>3</sup>, which annually celebrates those Local Authorities across England and Wales that go above and beyond to ensure animal welfare is not compromised in the event of flooding, coastal erosion or other emergency situations - under the umbrella of contingency planning provision.

## QUESTION 2: ARE THE OBJECTIVES AND MEASURES CLEAR?

No, RSPCA Cymru believes that the objectives and measures do not go far enough. As per our comments to Question 1, RSPCA Cymru believes that the National Strategy must take into consideration animal welfare before, during and after a flood.

We would like to pay particular attention to Objective B: Preparedness and Building Resilience. The Strategy states that a resilient community is well prepared for a flood and knows what action to take to reduce the potential impacts and damage caused. It is also able to minimise the disruption caused and recovers quickly from flood events.

With 47% of households in Wales owning at least one animal, 2% of these animal-owning households owning horses or ponies<sup>4</sup>, and some 9,500,000 sheep, 166,600 beef breeding herds, 254,300 dairy breeding herds and 23,200 pigs<sup>5</sup>, alongside the Welsh Government's commitment to healthy livestock being kept to high standards of welfare, having clear guidance and advice on pet, equine and livestock welfare in the case of an emergency should be seen as statutory in order to create communities resilient to flooding and coastal erosion.

For many people in rural parts of Wales, animals provide a source of livelihood, and if provisions aren't in place to care for these animals in the case of flooding or coastal erosion, such communities will not recover. Similarly, as noted, there are numerous animal-related businesses, animals in sport, as well as welfare charities who operate multi-species animal sanctuaries. If the Strategy wishes to create communities in Wales that are resilient, the correct provisions must be made to ensure that such businesses can continue to operate following flooding or coastal erosion.

Accordingly, RSPCA Cymru believes that the objectives and measures do not go far enough and must provide clear guidance and advice on how to best to ensure the safety of animals before, during and after a flood, in order to give at risk communities the greatest chance of recovery in the case of flooding.

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<sup>2</sup> [The Seven Wellbeing Goals](#)

<sup>3</sup> [RSPCA Cymru, PawPrints Awards - Contingency Planning](#)

<sup>4</sup> [National Survey for Wales 2014 - 2015. Pet Welfare](#)

<sup>5</sup> [Welsh Government, Farming Facts and Figures \(2018\)](#)

### QUESTION 3: DO YOU AGREE WITH OBJECTIVE A: IMPROVING OUR UNDERSTANDING AND COMMUNICATION OF RISK?

Yes, while RSPCA Cymru agrees with Objective A: Improving our understanding and communication of risk, we believe that the National Strategy needs to incorporate references to animals, including pets, equines and livestock, in its communication of flood risk.

One such option would be the further promotion of NRW's Floodline scheme, which provides free flood warnings for individuals and communities in areas at risk of flooding. By signing up to these warnings, owners of animals can ensure that they have the necessary procedures in place to ensure their welfare before, during and after a flood - also helping to create more resilient communities in Wales, as referenced in the Well-being of Future Generations (Wales) Act 2015.

Information regarding animal welfare in the case of an emergency is already available on the RSPCA website<sup>6</sup> but RSPCA Cymru believe that by incorporating clear references into the National Strategy, the RMA's, including Local Authorities, across Wales will have greater opportunities to ensure provisions for animals in the case of an emergency are made, giving animal owners greater choice when it comes to caring for their animals, in turn creating peace of mind and therefore promoting greater wellbeing in areas that are at higher risk of flooding. Further to the Welsh Government's proposal to provide a single consistent point of information on flood and coastal risk management, the inclusion of relevant animal welfare information within any such portal is clearly critical.

An objective of the new strategy is to ensure the public and stakeholders are using the most up to date information on flood risk and coastal erosion. We would urge Risk Management Authorities to incorporate relevant animal information into this process, including the incorporation of animal welfare into written contingency plans, information for animal owners that promotes preparedness and the preparation of an up-to-date contact list of animal welfare organisations and local vets who can assist in an emergency situation of flooding or coastal erosion. The identification of temporary animal shelters with an animal evacuation plan is also highly recommended.

#### Case Study: Monmouthshire County Council

Monmouthshire County Council have consistently provided guidance and advice on how to ensure pet welfare is upheld in the case of an emergency. This information is readily available on the Council's website.

Below is an example of some of the information that Monmouthshire County Council provides regarding pet welfare in an emergency:

- If you are evacuated to a local authority rest centre you will be able to take your pets - but you will be responsible for their care whilst you are at the centre.
- Identify your pets at all times with tags on their collars or microchips. Collar tags should display your name, telephone number and an emergency contact. While collars can become lost, microchips are a secure way of ensuring that your pet is identified via an electronic device that is implanted in your pet's shoulder area.

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<sup>6</sup> [RSPCA Flood Advice](#)

- If your pet requires medication, always have a back-up supply on hand in case an emergency occurs and you cannot get to your vet. Keep copies of your pets' medical records on hand so that if they are treated in the event of an emergency, the vets know about any prior health conditions or medical needs.
- Have pet carriers in your home in case you need to evacuate with your pets. For reptiles or fish, make sure you have lightweight plastic tanks that can be used for transporting animals in a hurry.

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Monmouthshire County Council have long been winners of the RSPCA's Gold Contingency Planning Footprint award for their work surrounding pet welfare in an emergency. The Council clearly highlights the importance of preparedness and communication with regards to animals and their owners in the case of emergency situations and is a great example of how we can improve our understanding and communication of flood risk.

Such advice goes a long way in providing comfort for pet owners in areas that are at risk of flooding. Accordingly, RSPCA believes that the National Strategy for Flood and Coastal Erosion Risk Management should seek to incorporate similar advice, expanded to also include advice for owners of equines and farm animals, into Objective A in order for Wales' RMA's to improve their understanding and communication of risk to communities.

RSPCA Cymru works with some of the bodies named within the consultation document, namely Local Resilience Fora, who work to the Wales Flood Group, who are linked to the listed Groups and Committees supporting the delivery of this new strategy. We would be happy to provide any of these organisations, or those referenced elsewhere in the consultation, with information as to the steps Risk Management Authorities can take to consider, plan and practice solutions that involve the protection of animals from flooding or coastal erosion risk.

#### QUESTION 4: DO YOU AGREE WITH OBJECTIVE D: PREVENTING MORE PEOPLE BECOMING EXPOSED TO RISK?

Yes, RSPCA Cymru agrees with Objective D: Preventing More People Becoming Exposed to Risk, however, we believe that this objective does not go far enough.

While human life must always be the priority in emergency situations, we recommend that the Objective be amended to read - *Objective D: Preventing More Communities Becoming Exposed to Risk.*

By amending Objective D to incorporate animals as well as people, the National Strategy can further its efforts to improve wellbeing in communities at high flood and coastal erosion risk. Through improved animal guidance and advice, the Strategy will create peace of mind and ensure that pet, equine and livestock owners will evacuate their homes in the case of an emergency. This further ensures the safety of human life, as animal owners do not have to frantically seek to care for their animals in emergency situations but can leave calmly, assured of their animals' safety. Such policies will go some way to creating a resilient Wales, a healthier Wales and a Wales of cohesive communities, as laid out in the Wellbeing of Future Generations (Wales) Act 2015.<sup>8</sup>

<sup>7</sup> [Monmouthshire County Council Pet Welfare in an Emergency](#)

<sup>8</sup> [The Seven Wellbeing Goals](#)

## QUESTION 8: ARE THERE ARE ANY OTHER KEY ISSUES OR TRENDS THAT YOU THINK SHOULD BE CONSIDERED IN THE STRATEGIC ENVIRONMENTAL ASSESSMENT - ENVIRONMENT REPORT?

Yes, the Environmental Assessment Report notes that the Strategy must maximise delivery of the Welsh Government's Wellbeing of Future Generations (Wales) Act 2015 Wellbeing Objectives. It is stated that by doing this, the National Strategy will set the framework for RMA's to continue this approach and work together in a collaborative and cohesive way to mitigate and reduce flood risk in Wales. RSPCA Cymru believes that in order to ensure the delivery of the Wellbeing Objectives laid under the Act is maximised, the new National Strategy should incorporate advice on how to best care for pets, equines and farm animals in the case of flooding or coastal erosion, for example the work of Monmouthshire County Council.<sup>9</sup>

One of the seven wellbeing goals is to create a healthier Wales, be it physical health, mental health or otherwise. RSPCA Cymru believes that by ensuring animals are incorporated into the National Strategy, Welsh Government will be ensuring that RMA's across Wales are helping to promote peace of mind, furthering mental wellbeing in communities and therefore helping to maximise commitment to the Wellbeing of Future Generations (Wales) Act 2015.

Further to the Wellbeing Act, another of the seven Wellbeing Goals is to create a resilient Wales. With a large proportion of Wales' population owning at least one animal, and with many of those not willing to leave their animals behind in the case of an emergency as well as there being hundreds, if not thousands, of animal-related businesses, animals in sport, as well as welfare charities who operate multi-species animal sanctuaries, it is the view of the RSPCA that it is not possible to create resilient communities if we do not account for the animals of the people that make up those communities. We firmly believe that if the National Strategy wishes to reflect the Wellbeing of Future Generations (Wales) Act 2015, steps must be taken to account for animals as part of the wider community and provisions put in place to ensure animal welfare is upheld in the case of flood risk.

## QUESTION 9: ARE THERE ADDITIONAL ENVIRONMENTAL EFFECTS (INCLUDING THOSE ON HUMANS) THAT NEED TO BE CONSIDERED WHEN DEVELOPING THE STRATEGY?

RSPCA Cymru note that many animal owners would not leave their animals behind in the case of an emergency. Accordingly, we suggest that the National Strategy reflects this sentiment towards pets, equines and farm animals by incorporating references on how to best care for animals before, during and after an emergency. RSPCA Cymru would be very happy for any of its guidance to be utilised, or criteria from our dedicated PawPrints Contingency Planning award to be incorporated<sup>10</sup>.

Without the necessary provisions in place for animals, the risk to humans likely increases as they seek to care for their animals as well as themselves in the case of flood risk.

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<sup>9</sup> [Cardiff Council. Pet and Animal Welfare in an Emergency](#)

<sup>10</sup> [RSPCA Cymru. Contingency Planning Footprint](#)

**QUESTION 12: 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:**

In the last few years the RSPCA has, alongside emergency services and local authorities, assisted in the rescue of animals in flood-hit communities around the country. Many of the people rescued would not have left their homes had the safety of their animals not been assured.

While human welfare will always remain the priority, there must be consideration for people's animals in emergency situations. Indeed, examples from emergencies in both the UK and overseas in the last few years, have shown that public order and health consequences can arise if contingency plans don't prepare for animal welfare.<sup>11</sup>

Awareness of preparedness with regard to animals has grown significantly in the last few years and there has been a concurrent rise in the number of entries for RSPCA's Contingency Planning Footprint which seeks to award those Local Authorities that have included animals and their welfare into their emergency planning considerations. These entries have provided some excellent case studies that we hope will encourage many more to consider animals in their plans. By incorporating animal references into the strategy, RSPCA Cymru firmly believes that it would be better equipped to achieve its five objectives, ensuring better peace of mind and therefore creating a healthier and more resilient Wales, as outlined in the Wellbeing of Future Generations (Wales) Act 2015.

RSPCA Cymru proposes that the National Strategy seeks to incorporate good practice guidance on how to care for owned animals in the case of an emergency, similar to that of Monmouthshire County Council as outlined in our response to Question 3. As noted, the RSPCA annual PawPrints Awards provide clear criteria on how RMA's, notably Local Resilience Forums and Local Authorities, should seek to achieve good practice when it comes to animals and emergency planning.

RSPCA Cymru believes that the National Strategy goes some way in providing a clear overarching strategy for ensuring that communities across Wales can effectively manage flood and coastal erosion risk. However, the strategy should be amended to incorporate guidance and advice on how to best care for pets, equines and farm animals in the case of flooding or coastal erosion. By doing so, the National Strategy will be able to meet its objectives and aims, helping more communities to deal with risk before, during and after the event.

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<sup>11</sup> Robin Chadwin, "Evacuation of Pets During Disasters: A Public Health Intervention to Increase Resilience", *American Journal of Public Health*, Vol. 107, No. 9 (2017), pp. 1413 - 1417