

BVA policy position on pet travel

Executive summary

Introduction

BVA supports the regulation of pet travel - both commercial and non-commercial - that enables the safe and legal movement of pets. Any movements must ensure that animal health and welfare, and public health, are protected, and travel routes are not abused for purposes that negatively impact on

Recommendation 6: The UK Government should extend the waiting time post-rabies vaccination to 12 weeks with the aim of minimising the risk of rabies incursion into the UK and simultaneously reducing illegal trade in puppies for sale via the non-commercial route.

Recommendation 7: To protect the UK's rabies-free status, the UK Government should restrict the movement of dogs from countries with high rabies risk in terrestrial animals and reintroduce the rabies titre test as a mandatory requirement before travel.

Recommendation 8: To reduce the risk of importation of disease endemic in other countries, the UK Government should restrict the movement of stray dogs from countries which are endemic for diseases not currently considered endemic in the UK eg. brucellosis, babesia, ehrlichia, dirofilariasis, leishmania and introduce testing for any such diseases as a mandatory requirement for stray dogs before travel to the UK.

Recommendation 9: Consideration should be given to maintaining a comprehensive record of all port checks and diagnostic results to feed in to UK surveillance data on the diseases covered by PETS and those not considered as endemic for the UK eg. brucellosis, babesia, ehrlichia, dirofilariasis, leishmania.

Recommendation 10: The UK Government should work to better enforce Pet Travel Scheme Rules to prevent the movement of dogs for the sole purpose of a change of ownership through non-commercial routes.

Recommendation 11: Prospective owners should be encouraged to rehome from the existing UK dog population and UK rehoming charities or welfare organisations.

Recommendation 12: The UK Governments should restrict the number of animals that can travel under the Pet Travel Scheme to five per non-commercial consignment rather than five per person (unless attending or training for a competition, show or sporting event where, in line with current legislation, written evidence of event registration must be provided).

Recommendation 13: Enforcement of the Pet Travel Scheme should be undertaken by Government agencies as opposed to carriers. This shift in responsibility should include a requirement for there to be sufficient out-of-hours and weekend cover at ports by Government agencies and the provision of veterinary delivered training or guidance to enforcement officers.

Recommendation 14: The verification procedure used at ports to check dogs entering the UK should be revised to ensure that an enforcement officer must see the animal when scanning the microchip and ensure microchips external to a dog are not scanned. For pets returning after shows, competitions or sporting events, their exit should be verified and import records reconciled, in the case of dogs by scanning their microchip and for all other pets, relevant paperwork is checked.

Recommendation 15: Regulation surrounding compliance inspections of commercial pet movements should be strengthened, including an increase in spot checks at ports.

Recommendation 16: Routes and mechanisms for reporting concerns about the illegal importation of animals and non-compliance with the Pet Travel Scheme should be more clearly defined, with improved accessibility out-of-hours.

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Introduction

BVA supports the regulation of pet travel, - both commercial and non-commercial - that enables the safe and legal movement of pets. Any movements must ensure that animal health and welfare, and public health, are protected, and travel routes are not abused for purposes that negatively impact on animal health and welfare (eg. puppy smuggling and the importation of stray dogs with unknown health histories).

The non-commercial movement of small animals (eg. dogs, cats and ferrets) is currently covered by EU Regulation no 576/2013 (known as the EU Pet Travel Scheme or PETS) and, for commercial movement, EU Directive 92/65/EEC (the Balai Directive).

Non-commercial movement of pets (EU Pet Travel Scheme)

The EU Pet Travel Scheme permits the movement of pet animals (dogs, cats and ferrets) to the UK without the need for quarantine, providing they meet certain conditions, such as having the correct documentation, identification, vaccinations and treatments.

EU pet travel regulations for the non-commercial movement of dogs, cats and ferrets travelling [within EU and listed non-EU countries](#) set out that pets must:

- be microchipped before rabies vaccination;

- be vaccinated against rabies at least 21 days before travel, pets must be at least 12 weeks old before receiving the rabies vaccination on the scheme;

- have a valid EU pet passport;

- travel with an approved transport company on an authorised route;

- Dogs entering the UK, Ireland, Finland, Norway or Malta must be treated for tapeworms by a vet with a product containing praziquantel (or equivalent) no less than 24 hours and no more than 120 hours (between 1 and 5 days) before its arrival in the UK.

For those [pets travelling from unlisted non-EU countries](#), they must meet the above requirements and additionally tak(,) TJET30 1 927(d)27(i)-12(t)-15(i)-12(o)27()] (p)27(e)27-12(t)-15(i)-12(o)27()] (p)27(e)27-12

Figure 1a: Current entry rules for pets re-entering the UK from the EU and listed third countries vs. Entry rules for pets re-entering the UK from non-listed third countries

Entry rules for pets re-entering the UK from the EU and listed third countries		Entry rules for pets re-entering the UK from unlisted third countries	
What has to be done	Required	What has to be done	Required

Pre-entry waiting period	Yes
Length of waiting period	12 weeks after vaccination against rabies
Tick treatment	Yes

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	vaccination (by EU approved lab). ³
Pre-entry waiting period	Yes
Length of waiting period	12 weeks from date of blood sample
Tick treatment	Yes

Recommendation 5: To protect the UK's Echinococcus multilocularis (EM)-free status, the tapeworm treatment window of 24-

Recommendation 6: The UK Government should extend the waiting time post-Rabies vaccination to 12 weeks with the aim of minimising the risk of rabies incursion into the UK and simultaneously reducing illegal trade in puppies for sale via the non-commercial route.

Addressing the movement of adult stray dogs for rehoming in the UK

BVA is concerned about the biosecurity risk posed by the movement of adult stray dogs into the UK for rehoming that have an unknown health history. Under current pet travel regulations, stray dogs can be moved within the EU as long as they are compliant with existing pet travel regulations, including receiving the rabies vaccination and completing the 21-day wait period. However, a stray dog with an unknown history may be moved into the UK whilst it is still incubating a disease, including rabies, as there is no longer the requirement for the *titre* test before travel.

In addition, for dogs that are non-compliant with pet travel regulations, they are quarantined until they are compliant. Therefore, an unvaccinated dog could be vaccinated, quarantined for three weeks and then allowed to enter the UK whilst incubating a disease upon which a vaccination would have little to no effect^{18, 19} These diseases may not be detected in non-clinically affected dogs and are difficult to eliminate from the carrier animal. This puts the UK at a higher disease risk from rabies and diseases which are not endemic in the UK and potentially zoonotic eg. *babesia*, *ehrlichia*, and *leishmania*.

It is important, however, to balance these considerations with the incidence of rabies across Europe. Rabies incidence has significantly decreased since 1991, with approximately 13,000 cases in 1991 to only 200 cases in 2011.²⁰ Be that as it may, the Pet Travel Scheme rules allow for the movement of pets from EU Member States that are still deemed rabies-positive. With this in mind, the dramatic percentage increase of dogs entering the UK from rabies-positive member states is particularly concerning, with dogs entering from Hungary increasing by 663 per cent (399 to 3044) and Lithuania (considered to have a 'high risk' of rabies

ensured that puppies entering the UK match the information in their pet passport and are not underage.

Recommendation 12: The UK Governments should restrict the number of animals that can travel under the Pet Travel Scheme to five per non-commercial consignment rather than five per person (unless attending or training for a competition, show or sporting event where, in line with current legislation, written evidence of event registration must be provided).

Recommendation 13: Enforcement of the Pet Travel Scheme should be undertaken by Government agencies as opposed to carriers. This shift in responsibility should include a requirement for there to be sufficient out-of-hours and weekend cover at ports by Government agencies and the provision of veterinary delivered training or guidance to enforcement officers.

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Strengthening compliance checks for the commercial movement of pets (Balai Directive)

The Balai Directive ([EU Directive 92/65/EEC](#)) sets out the requirements for the commercial import and export of animals being moved in or out of EU Member States. In addition to the requirements set out under the Pet Travel Scheme, the Directive requires that:

Animals must be exported from premises which are either registered or approved by the country of origin

An authorised veterinarian must carry out a fitness to travel examination on each animal up to 48 hours before travel

Each movement of animals must also have a health certificate signed by an authorised veterinarian.

Since 2012, the total number of dogs commercially imported into the UK has risen from 6,085 to 34,017²⁵, with some illegal importers transporting pets under the Balai Directive and commercial routes due to increased scrutiny of illegal imports through the Pet Travel Scheme²⁶. Further, under the Balai Directive, compliance checks are only required at the points of origin and destination as opposed to at the ports, and less than 10% of consignments are in fact checked at the place of destination.²⁷ With this in mind we are concerned that the Balai Directive is open to abuse by illegal importers and there are missed opportunities in the identification of non-compliance with commercial pet travel regulations.

Recommendation 15: Regulation surrounding compliance inspections of commercial pet movements should be strengthened, including an increase in spot checks at ports.

²⁵ <https://www.parliament.uk/business/publications/written-questions-answers-statements/written-question/Lords/2017-01-09/HL4462>

Recommendation 16: Routes and mechanisms for reporting concerns about the illegal importation of animals and non-compliance with the Pet Travel Scheme should be more clearly defined, with improved accessibility to out-of-hours.