

BVA and BSAVA joint response to Defra consultation on commercial and non-commercial movements of pets into Great Britain

14 October 2021

Who we are

1. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 18,000 members, our primary aim is to represent, support and champion the interests of the United Kingdom's veterinary profession. We therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.
2. Our response has been formulated in close liaison with the British Small Animal Veterinary Association (BSAVA), which exists to promote excellence in small animal practice through education and science and is the largest specialist division of BVA representing over 11,000 members.
3. We welcome the opportunity to feed into Defra's consultation on commercial and non-commercial movements of pets in Great Britain. We support 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, the legal importation of dogs from low welfare sources and the importation of stray dogs with unknown health status).
4. We are largely supportive of the proposals set out in this consultation. We strongly support efforts to restrict the low welfare and illegal puppy trade, as well as closing legal loopholes that allow the importation of dogs with mutilations which are currently illegal in the UK on animal welfare grounds.
5. However, as these proposals will only apply to Great Britain, we are particularly concerned that both puppy dealers and those importing dogs with illegal mutilations will be able bypass the additional legislative restrictions by transporting puppies and dogs through Northern Ireland and into Great Britain. While we recognise the political complexities surrounding Northern Ireland remaining in the single market, GB governments



Question 3: To what extent do you agree or disagree that the government's proposed exception is appropriate (that the Secretary of State (or Ministers in Scotland and Wales)



20. sell ear-cropped dogs or import them from abroad. These loopholes support ear-cropping of dogs being carried out abroad and permit the continued importation of ear cropped dogs into the UK for onward sale, normalising the procedure and in turn driving demand for this aesthetic. Furthermore, we believe

Question 7: in the case of tail docking, the mutilation was permitted as the dog is a recognised working dog?

26. Unless it can be verified by a recognised process or criteria that a dog is a working dog (for example in the case of an older dog) we would strongly disagree with this proposal. Given that the new proposals intend to raise the age at import to six months it should be more feasible to ascertain if a young dog is intended as a working dog. On this basis we would suggest it more appropriate that all imported dogs are non-mutilated an

32. Ultimately, we consider that the commercial movement of all pregnant bitches into Great Britain should be prohibited. However, we recognise that this may not be practical to enforce.
33. We therefore agree with proposals to further restrict the commercial movement of pregnant dams into Great Britain. We are seriously concerned by the emerging trend in the movement of heavily pregnant dams into Great Britain and the welfare implications for the dams and puppies involved, as outlined in the consultation document.
34. However, it is not clear from the proposals whether commercial organisation/business will be required to prove that the animal is less than 42 days pregnant before travel and how this will be verified. At the very least, we consider that they should be required to declare if the dam is pregnant, date of mating and date of pregnancy confirmation.
35. Equally, it is not clear from the proposals whether private veterinary surgeons will be required to support enforcement of this ban by verifying gestational markers and ultrasound scanning dams suspected to be more than 42 days pregnant, or whether this function will be carried out by APHA vets. Should private vets be required to support enforcement, clear guidance should be made available to set out their roles and responsibilities, and they should be remunerated for their professional time. We would ask that development of any draft guidance should be carried out in consultation with the veterinary profession. In addition, we would suggest that Defra actively engage with their counterpart authorities in European countries to minimise export of pregnant dams from their countries so that the problem is tackled at source and the welfare of heavily pregnant dams is genuinely protected.
36. To strengthen this proposal, we would also support the introduction of a requirement for the commercial organisation/business to provide a veterinary 'fit to travel certificate' for any bitch that appears to be pregnant or lactating. Introducing this fit to travel requirement would enable a vet to make a welfare assessment based on the individual animal and journey before the animal is transported.

Question 12: to what extent do you agree or disagree that the government should introduce a ban on the non-commercial movement into Great Britain of dogs, which are more than 42 days pregnant?

37. We strongly agree with this proposal. We are seriously concerned by the emerging trend in the movement of heavily pregnant dams into Great Britain and the welfare implications for the dams and puppies involved, as outlined in the consultation document.
38. However, it is not clear from the proposals whether the owners of pregnant dams will be required to prove that the animal is less than 42 days pregnant before travel and how this will be verified. At the very least, we consider that the owner should be required to declare if the dam is pregnant, date of mating and date of pregnancy confirmation.
- 39.

Ferrets

Question 20: to what extent do you agree or disagree with the government's proposal to retain existing requirements in relation to the commercial import and non-commercial movement.

55. We agree with this proposal.

Additional recommendations to strengthen the regulation of commercial and non-commercial to protect animal health

56. In addition to proposed restrictions on pet travel to improve animal welfare, the UK governments should also take this opportunity to amend pet travel regulations to better safeguard the health of the UK's animals, and wider public health.
57. Reintroducing compulsory tick treatments for all commercial and non-commercial movements of cats and dogs
Tick treatments for cats and dogs are no longer required for commercial and non-commercial movements of cats and dogs into GB, however we strongly advise that prophylactic tick treatment is given before travel. We are concerned that the removal of the requirement for tick treatments under the previous EU Pet Travel Scheme has increased the risk of UK exposure to tick species not native to the UK and the potentially zoonotic vector-borne disease they can may carry. This has been demonstrated by canine babesiosis cases in Essex in 2016, including one report of an autochthonous case.⁶ In addition, the vector-borne diseases ehrlichiosis and babesiosis are zoonotic and so present a risk to public health as well as posing a significant welfare impact on an immunologically naïve population of animals. To address the risk of exposure to non-native tick species and potentially zoonotic vector borne disease, the GB governments should reintroduce tick treatments for all commercial and non-commercial movements of cats and dogs.
58. Introducing tapeworm treatment for cats as well as dogs and shortening the tapeworm treatment window
At present only dogs entering GB must be treated for tapeworms by a vet no less than 24 hours and no more than 120 hours (between 1 and 5 days) before its arrival in the UK (unless arriving directly from *Echinococcus multilocularis* free EU Member States – currently Malta, Ireland and Finland). The UK is currently not infected with the tapeworm *Echinococcus multilocularis* (EM). However, although the tapeworm *Echinococcus multilocularis* (EM) is relatively benign in dogs, cats and ferrets, the resulting disease in humans – *alveolar echinococcosis* – is an invasive, cancer-like cystic state of the parasite and can be fatal if not treated. GB governments should therefore introduce tapeworm treatment for cats as well as dogs. Consideration should also be given to reintroducing tapeworm treatments for ferrets as per previous requirements under the Pet Travel Scheme.⁷ In addition, we also support the EFSA recommendation that consideration should be given to shortening the tapeworm treatment window from 24-120 to 24-48 hours before entry into the UK from countries infected with EM, to reduce the risk of re-infection in the UK and keep the UK's *Echinococcus multilocularis* (EM)-free status.⁸
59. Extending the waiting time post-rabies vaccination to 12 weeks
We also support extending the waiting time post-rabies vaccination to 12 weeks (at present the wait time stands at 21 days). Extending the wait time within current pet travel legislation would cover the potential

60. Defra made changes to the post-rabies vaccination waiting time based on a scientific risk assessment that concluded that the risk of incursion would be very low.¹⁰ However we would question how appropriate a 21 day period is.¹¹ In addition, we believe these changes did not take into account the scale of the illegal importation of puppies and how the Pet Travel Scheme could then be abused to illegally import large numbers of puppies below 15 weeks of age without regard for their welfare needs and in poor health and transport conditions¹². Further, if the wait time were to be extended to 12 weeks post-first vaccination, at 12 weeks the puppy would be a minimum of 24 weeks of age at the point of entry, and dentition checks would be more feasible to use as an option to check age.
61. In addition, extending the post-rabies vaccination wait time to 12 weeks would reduce the disease risk from rabies and other diseases posed by puppies of unknown origin and further reduce the very low risk of rabies incursion of legal imports by aligning the post-vaccination wait time with the average incubation period for the disease.¹³ At present, the 21 day wait time is to allow the vaccine to stimulate the dog's immune system, as opposed to bearing relation to the incubation of the rabies disease itself. Evidence identifies that the average rabies incubation period in individual dogs ranges between 9-69 days, indicating that a 12 week wait time post-vaccination would be more effective in terms of reducing disease risk.^{14,15,16,17,18} Not least, the introduction of a 12 week wait time would align with the current wait period for dogs coming into the UK from unlisted third countries of 12 weeks.
62. Addressing the movement of adult stray dogs for rehoming in the UK
We are seriously 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 to the UK 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.
63. In addition, dogs that are non-compliant with pet travel regulations 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^{19,20}. 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. brucellosis, babesiosis, ehrlichiosis and leishmaniasis.

[smuggling/ps-media](#)

¹⁰ Veterinary Laboratories Agency (2010) "A quantitative risk assessment on the change in likelihood of rabies introduction into the United Kingdom as a consequence of adopting the existing harmonised Community rules for the non-commercial movement of pet animals."

¹¹ Tojinbara K, et al., 2016. Estimating the probability distribution of the incubation period for rabies using data from the 1948-1954 rabies epidemic in Tokyo. *Prev Vet Med.* 2016 Jan 1;123:102-105. doi: 10.1016/j.prevetmed.2015.11.018..

¹² Dogs Trust (2017) Puppy Smuggling – A Tragedy Ignored [pdf] Available at: <https://www.dogstrust.org.uk/puppy-smuggling/ps-media>

¹³ Greene, 2012. *Infectious Diseases of the Dog and Cat.* 4 ed. s.l.:Elsevier

¹⁴ Fekadu, Shaddock and Baer 1982 Excretion of Rabies Virus in the saliva of dogs *The Journal of Infectious Diseases,* 145 5 (May 1982) 715-719

¹⁵ Fekadu 1988 Pathogenesis of rabies virus infection in dogs *Review of infectious diseases* 10 4 Nov-Dec 1988

¹⁶ Compendium of Animal Rabies Prevention and Control, 2016. *Journal of the American Veterinary Medical Association* March 1, 2016, Vol. 248, No. 5, Pages 505-517 <https://doi.org/10.2460/javma.248.5.505>

¹⁷ Rupprecht, C.E., 'Overview of Rabies' in *MSD Veterinary Manual.* Available at:

<https://www.msddvetmanual.com/nervous-system/rabies/overview-of-rabies>

¹⁸ Defra, 2011. Rabies Disease Control Strategy. Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69523/pb13585-rabies512-control-strategy-110630.pdf

