

# BVA and BSAVA joint response to the EFRA Committee Puppy Smuggling Inquiry

16 September 2019

## 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 contribute to the EFRA Committee inquiry on puppy smuggling. 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).
4. Whilst the Pet Travel Scheme (PETS) and the Balai Directive have made the transport of pets between the UK and mainland Europe easier and more cost effective, BVA supports the strengthening of commercial and non-commercial pet movement legislation to safeguard the health of the UK's animals and the wider public and prevent unintended consequences to animal welfare through puppy smuggling. We are calling on the UK Government to:
  - Strengthen enforcement provisions (including restricting number of animals that can travel under the Pet Travel Scheme to five per non-commercial consignment rather than five per person);
  - Strengthen compliance checks for the commercial movement of pets (Balai Directive);
  - Extend the waiting time post-rabies vaccination to 12 weeks;
  - Reintroduce compulsory tick treatments for all cats and dogs travelling under the Pet Travel Scheme;
  - Introduce tapeworm treatment for cats as well as dogs and shortening the tapeworm treatment window from of 24-120 should be shortened to 24-48 hours; and
  - Address the movement of adult stray dogs for rehoming in the UK.

Our full policy position and rationale for strengthening pet travel legislation is available at **Annex A**.

5. We recognise that the ban on third party sales, if adequately resourced and properly enforced, could also encourage more responsible purchasing behaviours as well as opportunities for breeders to demonstrate how they have met the welfare requirements of the puppies/kittens in their care eg. through [the Puppy Contract](#).
6. However, a ban on third party sales must not be considered in isolation. This measure must be part of a holistic approach which considers a suite of measures that would address the complexity of the issues relating to sales of puppies and kittens. This should cover legislation encompassing all sources of supply and demand, including advertising, sales conducted on social media, illegal imports and ideally, should be supported by an understanding of customer demand and pet purchasing behaviours. In addition, we would recommend that anyone breeding from a dog or cat is required to register with their local authority

and demonstrate appropriate animal identification eg. microchipping. Such an approach would reduce the risk of any unintended consequences and ensure that significant numbers of puppy and kitten sales are not driven underground or sourced through illegal imports.

## How many puppies are imported into the UK illegally, including under the EU Pet Travel Scheme?

7. [Recent figures released from Defra](#) demonstrate that imports of dogs to Great Britain through the Pet Travel Scheme (PETS) rose to 307,357 dogs in 2018, from 152,075 in 2013 and from 85,786 dogs pre-PETS in 2011. We note that this is the fifth year in a row that import numbers have increased since changes to harmonise the Pet Travel Scheme (PETS) with the rest of the EU in 2012 (152,075 in 2013, 164,836 in 2015, 275,876 in 2016, 287,016 in 2017 and 307,357 in 2018)<sup>1,2</sup>.
8. We do not have complete figures of the number puppies imported into the UK illegally, however [Dogs Trust investigations into this issue](#) have repeatedly demonstrated the use of the Pet Travel Schemes (PETS) to illegally import puppies into the UK. It is important to note that any numbers are likely to be underestimates as there will always be animals that are not picked up as illegal or non-compliant.
9. Statistics from BVA's [Voice of the Veterinary Profession survey](#) showed that three in ten (29%) companion animal vets surveyed in 2018 had seen puppies that they were concerned had been brought into the country illegally. It is important to note that the most commonly mentioned breed was the French Bulldog, with more than half (54%) of all vets who had suspected a case of illegal importation citing it alongside Pugs (24%) and designer crossbreeds such as Cockapoos (18%) as the three breeds they had most concerns about. Dachshunds, Chihuahuas, Shih Tzus and Poodle crosses were other breeds mentioned by vets.
10. These statistics mirrored findings from [Dogs Trust's](#) most recent [puppy smuggling investigation](#), which reported that 63% of puppies intercepted at the British border as part of the Puppy Pilot scheme between December 2015 and July 2018 were French Bulldogs, Pugs, English Bulldogs and Dachshunds. These figures demonstrate that key driver in illegal importations appears to be the demand for 'designer' breeds and cross-breeds.
11. Further, if vets suspected that a puppy was illegally imported, almost three-quarters (72%) of vets said their suspicions were raised by the client's explanation of how or where they got the puppy. Around half (44%) were told the puppy had been brought from abroad, but they found it to be too young to have been imported legally. In more than a quarter of cases (28%), the puppy's age did not appear to match the information on the pet passport, while in a similar number of cases the vet found a foreign microchip in a puppy who was too young to have been imported. Other reasons included poorly completed pet passports, suspicious vaccination records and poor health.<sup>3</sup>
12. The above findings echo many of the findings of the BSAVA's survey in late 2018 of their OV members (Official Vets who undertake government work relating to PETS in veterinary clinics).<sup>4</sup> Results indicated that 51% were concerned about the current rabies vaccination regime; 68% were concerned about the tick treatment regime for pets entering the UK from abroad; and over 50% expressed concerns about pet passports including forgery (non-UK), poor border checks, puppies appearing younger than the age on

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<sup>1</sup> Dogs Trust, 2017. Puppy Smuggling – A Tragedy Ignored [pdf] Available at: <https://www.dogstrust.org.uk/puppy-smuggling/ps-media>

<sup>2</sup> Dogs: Imports:Written question – 254873 <https://www.parliament.uk/business/publications/written-questions-answers-statements/written-question/Commons/2019-05-15/254873>

<sup>3</sup> <https://www.bva.co.uk/news-campaigns-and-policy/newsroom/news-releases/french-bulldog-and-pug-puppies-top-list-of-most-illegally-imported-breeds,-bva-and-dogs-trust-findings-reveal/>

<sup>4</sup> The BSAVA survey ran for 10 days in October 2018 and approximately 470 responses were received.

the passport and in particular, concerns around imports from Eastern European countries. Respondents also commented on the difficulty in reporting non-compliances through local government bodies.

### Reporting illegal imports

13. We advise that vets wishing to report suspicions of illegal importation or smuggling should report the suspected non-compliance to their Local Authority Animal Health Function (LAAHF). The LAAHF is a term used to identify the personnel within a local authority that are responsible for the provision of animal health and welfare enforcement (normally located within trading standards or environmental health services).
14. We would therefore recommend that EFRA Committee consult with the National Animal Health and Welfare Panel (which brings together LAAHF functions) to ascertain if they collect figures regarding the number of illegally imported pets that are reported to them.
15. In [our policy position on Pet Travel](#), we also set out that 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 reporting through the Local Authority Animal Health Function (LAAHF). To address this, we have been working closely with the National Animal Health and Welfare panel to develop supporting guidance for vets who are considering reporting suspicions of illegal importation to their Local Authority Animal Health Function. We expect publication of this resource in late 2019.

### Are border controls in the UK sufficient to detect puppies being imported illegally, and if not, how should this be improved?

16. Given that the number of movements of dogs per year has significantly increased year on year since the introduction of the Pet Travel Scheme in 2011 we are concerned that this has outstripped resources available to check and enforce pet travel legislation, and detect illegal imports.
17. We would strongly support restricting 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).
18. Enforcement provisions should also be improved and we would question whether the carriers are the right people to undertake routine checks. Authorised officers may benefit from veterinary-delivered training or guidance, including guidance on dentition checks if the age limit is raised to 15 weeks.
19. The verification procedure itself should also be revised to ensure that an enforcement officer must see the animal when scanning for a microchip and ensure that any microchips placed external to a puppy in its carrier are not scanned. In addition, it should be ensured that puppies entering the UK match the information in their pet passport and are not underage.
20. We also note that there is a lack of clarity as to whether the non-commercial movement of pets requires the owner/person with permission to transport the animal to complete and present [a declaration for the non-commercial movement of animals](#) with their pet passport at check points, and whether this is currently being enforced.
21. Enforcement of commercial pet movements to prevent abuse  
Since 2012, the total number of dogs commercially imported into the UK has risen from 6,085 to 34,017<sup>5</sup>, with some illegal importers transporting pets under the Balai Directive and commercial routes due to increased scrutiny of illegal imports through the Pet Travel Scheme<sup>6</sup>. Further, under the Balai

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<sup>5</sup> <https://www.parliament.uk/business/publications/written-questions-answers-statements/written-question/Lords/2017-01-09/HL4462>

<sup>6</sup> Dogs Trust, 2017. Puppy Smuggling – A Tragedy Ignored [pdf] Available at: <https://www.dogstrust.org.uk/puppy->

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.<sup>7</sup>

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

### **After EU Exit, should the UK introduce tougher controls on pet imports? How would these be balanced against the needs of people legally transporting pets across borders?**

23. We would strongly support the strengthening of pet travel legislation to safeguard the health of the UK's animals and wider public and prevent unintended consequences to animal welfare through the circumvention of existing legislation eg. illegal importation of puppies.

#### **Restricting number of animals that can travel under the Pet Travel Scheme**

24. As highlighted above, we would strongly support restricting 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).
25. Under current controls, as it is possible to move five puppies per person non-commercially, it is possible for two or three people to bring in 10-15 puppies in this manner in one consignment and, in turn abuse legislation to bring in numerous puppies for commercial purposes.<sup>8</sup>

#### **Extending the waiting time post-rabies vaccination to 12 weeks**

26. We support extending the waiting time post-rabies vaccination under current pet travel legislation 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 extended incubation period for rabies (see below) and has the potential to reduce the misuse of non-commercial routes for the illegal imports of puppies for sale as the puppies will be older and past their most saleable age. This approach therefore has the potential reduce the negative welfare implications for puppies imported via this route<sup>9</sup> and the likely negative welfare experienced by the breeding bitches supplying these puppies.
27. 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.<sup>10</sup> However we would question how appropriate a 21 day period is.<sup>11</sup> 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 conditions<sup>12</sup>. Further, if the wait time were to be extended to 12 weeks post-

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[smuggling/ps-media](#)

<sup>7</sup> Ibid.

<sup>8</sup> Ibid.

<sup>9</sup> Dogs Trust, 2017. Puppy Smuggling – A Tragedy Ignored [pdf] Available at: <https://www.dogstrust.org.uk/puppy-smuggling/ps-media>

<sup>10</sup> 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."

<sup>11</sup> 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..

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

first vaccination at 8 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.

28. 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 an 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.<sup>13</sup> 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.<sup>14,15,16, 17, 18.</sup> 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.
29. It is important to note that under the current advice with regard to a no deal Brexit - the requirements for travel from UK to EU, will be more stringent than travelling from the EU to the UK. It is expected that the EU will treat the UK as an [unlisted third country](#) and require blood testing to confirm rabies titre and a 3 month wait to confirm the rabies vaccination has been successful, while animals returning to the UK from [the EU will be able to do so with their pet passport as under current Pet Travel Scheme rules](#).

### Additional recommendations to strengthen controls

30. In the [BVA policy position on pet travel](#) we also set out the following recommendations to protect the health and welfare of the UK's animals, and the wider general public. For more detailed information on the rationale behind these recommendations please consult the policy position at **Annex A**:
- The UK Government should reintroduce compulsory tick treatments for all dogs and cats travelling under the Pet Travel Scheme. Consideration should also be given to reintroducing compulsory tick treatments for ferrets as per previous requirements under the Pet Travel Scheme.<sup>19</sup>
  - The UK Government should introduce tapeworm treatment for cats as well as dogs under the Pet Travel Scheme. Consideration should also be given to reintroducing tapeworm treatments for ferrets as per previous requirements under the Pet Travel Scheme.<sup>20</sup>
  - To protect the UK's *Echinococcus multilocularis* (EM)-free status, the tapeworm treatment window of 24-120 should be shortened to 24-48 hours before entry into the UK from infected countries.
  - 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.

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#### [smuggling/ps-media](#)

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

<sup>14</sup> 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

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

<sup>16</sup> 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>

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

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

<sup>18</sup> Defra, 2011. Rabies Disease Control Strategy. Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69523/pb13585-rabies-control-strategy-110630.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69523/pb13585-rabies-control-strategy-110630.pdf)

<sup>19</sup> Defra, 2017. The Pet Travel Scheme. Advice to veterinary surgeons in GB: ferrets. Available at:

[http://webarchive.nationalarchives.gov.uk/20090731224433/http://www.defra.gov.uk/animalh/quarantine/factsheet/ukvet\\_sferretfactsheet.pdf](http://webarchive.nationalarchives.gov.uk/20090731224433/http://www.defra.gov.uk/animalh/quarantine/factsheet/ukvet_sferretfactsheet.pdf)

<sup>20</sup> Ibid.

- 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*, *dirofilarial*, *leishmania* and introduce testing for any such diseases as a mandatory requirement for stray dogs before travel to the UK.
- 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*, *dirofilarial*, *leishmania*.
- 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.
- Prospective owners should be encouraged to rehome from the existing UK dog population and UK rehoming charities or welfare organisations.

### Will the ban on third party sales of puppies: (i) encourage buyers to source puppies responsibly; and (ii) reduce illegal puppy smuggling?

31. We recommend that anyone considering buying a puppy only buys directly from a reputable breeder (including members of the Kennel Club Assured Breeder Scheme) or considers giving a home to a rescue dog from a recognised UK rehoming charity.
32. There are specific health and welfare concerns that arise in the context of commercial third-party sales that could be addressed through the ban. The ban on third party sales may reduce the activity of unscrupulous breeders and large-scale suppliers such as those puppy farmers who have given minimal regard to the health and welfare of the puppies or kittens often intended for sale to pet dealers and pet shops who sell on to the wider public.
33. The ban on third party sales, if adequately resourced and properly enforced, could also encourage more responsible purchasing behaviours (in line with Government advice to see puppies and kittens with their mother and to foster a better understanding of the provenance of animals), as well as opportunities for breeders to demonstrate how they have met the welfare requirements of the puppies/kittens in their care eg through [the Puppy Contract](#). We hope that in turn this would have a positive impact and drive up welfare standards overall.

### Holistic approach to supply and demand

34. However a ban on commercial third-party sales does not represent a welfare panacea in puppy breeding, sales and activity. There may be unintended consequences of banning third party sales as it may drive supply underground and result in suboptimal welfare practices, as well as increased illegal imports.
35. We note only a small number of pet shops sold puppies and kittens in England before the ban and it is likely that many third party sales are now carried out online under the guise of sales from individual breeders or illegal importers. It is therefore uncertain how these online sales are going to be monitored under new third party sales legislation and how consumers will identify animals that are not being sold through a third party.
36. Further consideration must therefore be given to a holistic approach that tackles the complex issues surrounding all sources of supply and demand for puppies eg internet sales and advertising, social media, illegal imports and purchasing behaviours.

### Strengthening pet travel legislation

37. As outlined above to prevent an increased demand for illegally imported puppies we would strongly support the strengthening of pet travel legislation (see our full policy position on pet travel at **Annex A for specific recommendations**)

### Managing internet sales and advertising

38. In terms of managing internet sales and advertising, as a member of [the Pet Advertising Advisory Group \(PAAG\)](#) we would support further engaging with online marketplaces (including social media sites) to ensure that [PAAG's minimum standards for responsible advertising](#) are adopted and raise public awareness of the need to act responsibly when looking to buy pets advertised on websites.

### Requirement for breeders to register with local authorities

39. We support the Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018 and the requirement for anyone breeding three or more litters to be licensed. However, it is difficult to identify all those who require licencing and we would therefore recommend that anyone breeding from a dog should be required to register with their local authority (with the data treated in line with the Data Protection Act 2018). This would mean that the local authority had a list of contact details for all dog breeders in their area, aiding enforcement bodies and ensuring that dog breeders were aware of the legal requirements. There should be a publicly available national list of dog breeders, to provide intelligence for enforcers, and also allow the public to check the list to identify those who don't have a number.

### Government-led education campaigns

40. We would welcome a government-led education campaign, supported by animal welfare stakeholders, to increase awareness of responsible puppy purchasing and ownership. We would strongly support a similar approach to the Scottish Government's [#BuyAPuppySafely](#) campaign to educate the public about the risks of buying puppies advertised on-line and rehoming dogs supplied from abroad in order to educate prospective owners and encourage responsible purchasing behaviours.

### Enhanced understanding of purchasing influences

41. In addition, we would welcome enhanced research to better understand the influences that drive demand for pets in order to develop targeted strategies that will influence purchasing behaviours. In terms of understanding what drives demand for puppies and kittens from different sources, research, for example that led by [Dr. Rowena Packer assessing what influences the public to buy the popular flat-faced \(brachycephalic\) dogs and their purchasing behaviours](#), may be of interest.

### How could demand in the UK for puppies be better met by domestic breeding?

42. Accurate assessment of demand for puppies in the UK is limited by the lack of clarity regarding statistics and market segmentation. Defra's figures indicate an annual demand for 700,000 puppies however other sources suggest an annual demand of up to 800,000 (dependent on assumed average life-span). The recent [PFMA survey of pet ownership](#) indicates that there is a total of 9 million dogs in the UK and that the number has increased by 400,000 in the last year alone.
43. Given the paucity of robust statistics, we would welcome a Government analysis of the demand for puppies in the UK to better understand the true impact of a ban on third party sales and the need to meet demand for puppies through domestic breeding.
44. In addition, when considering how to meet demand for puppies in the UK, it is important to avoid oversimplification when considering how larger, licensed, breeding establishments address the health and welfare needs of the pets in their care, recognising that welfare outcomes are not solely dependent on the type or size of different breeding establishments. High health status, high welfare puppies and kittens require appropriate opportunities for socialisation, appropriate preventive healthcare regimes and musculoskeletal development in appropriate early life environments, which some larger licensed establishments may be able to provide.

## Annex A: BVA policy position on Pet Travel

### 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 take a blood serology test after rabies vaccination, followed by a three-month wait before entry into the UK.

Whilst the Pet Travel Scheme has made the transport of pets between the UK and mainland Europe easier and more cost effective for owners, BVA supports the strengthening of pet travel legislation to safeguard the health of the UK's animals and wider public and prevent unintended consequences to animal welfare through the circumvention of existing legislation eg. illegal importation of puppies.

Figure 1 illustrates the current difference between entry rules for pets re-entering the UK from the EU and approved third countries and entry rules for those re-entering the UK from non-approved third countries against BVA recommendations to strengthen pet travel legislation as set out in this position paper.

**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
Microchip	Yes	Microchip	Yes
Rabies vaccination	Yes	Rabies vaccination	Yes
Blood test	No	Blood test	Yes. Blood sample must be taken at least 30 days after vaccination (by EU approved lab).
Pre-entry waiting period	Yes	Pre-entry waiting period	Yes
Length of waiting period	21 days after vaccination against rabies	Length of waiting period	12 weeks from date of blood sample
Tick treatment	No, but recommended	Tick treatment	No, but recommended
Tapeworm treatment	Yes (dogs only, 24-120 hours before embarkation to UK unless arriving directly from <i>echinococcus multilocularis</i> free Member States – currently Malta, Ireland and Finland)	Tapeworm treatment	Yes (dogs only, 24-120 hours before embarkation to UK)

**Figure 1b: BVA recommendations for EU, listed third countries and non-listed third countries as set out in this policy position**

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
Microchip	Yes	Microchip	Yes
Rabies vaccination	Yes	Rabies vaccination	Yes
Blood test	No	Blood test	Yes. Blood sample must be taken at least 30 days after

			vaccination (by EU approved lab).
<b>Pre-entry waiting period</b>	Yes	<b>Pre-entry waiting period</b>	Yes
<b>Length of waiting period</b>	12 weeks after vaccination against rabies	<b>Length of waiting period</b>	12 weeks from date of blood sample
<b>Tick treatment</b>	Yes	<b>Tick treatment</b>	Yes
<b>Tapeworm treatment</b>	Yes (dogs and cats, 24-48 hours before embarkation to UK unless arriving directly from <i>echinococcus multilocularis</i> free Member States – currently Malta, Ireland and Finland)	<b>Tapeworm treatment</b>	Yes (dogs and cats, 24-48 hours before embarkation to UK)

## Ensuring listed-country status of the UK within the Pet Travel Scheme and clear guidance as to entry requirements

In the [BVA Brexit and the Veterinary Profession report, we have called for](#) consideration to be given to the status of the UK for the purpose of the Pet Travel Scheme. The UK may be required to become a listed country or the EU could continue to recognise UK pet passports in the same way it does for Switzerland, Norway, Andorra and others. Within these options, clarification will be needed as to whether existing passports will remain valid or new UK passports will need to be issued, as well as clarification as to whether UK-based vets will be able to update EU passports. Alternatively, owners may be required to get a new UK passport or third-party certification before travelling with their pet.

In addition, there should be clear guidance and signposting to entry requirements that all pets travelling from EU member states, listed third countries and non-listed third countries must meet before they are able to enter the UK and vice versa. Specific consideration should be given to the provision of consistent, clear Government guidance for pet owners and vets in the United Kingdom and the Republic of Ireland, with Northern Ireland being the only UK administration to share an epidemiological unit and land border with an EU member state. It is therefore important that there is clarity regarding the fact that the same entry rules apply to pets travelling from the Republic of Ireland eg. requirement for a Pet Passport and the rabies vaccination as with pets travelling to the UK from any other EU or listed third country and *vice versa*.

**Recommendation 1: The UK Government should negotiate for the UK to become a non-EU country from which pet passports are recognised with the Pet Travel Scheme.**

**Recommendation 2: The UK governments should ensure the provision of clear, consistent guidance as to the entry requirements that pets travelling from all EU member states, listed third countries and non-listed countries must meet before they are able to enter the UK and vice versa.**

**Reintroducing compulsory tick treatments for all cats and dogs travelling under the Pet Travel Scheme**

Tick treatments for cats and dogs are no longer required under the Pet Travel Scheme, however we strongly advise that prophylactic tick treatment is continued before travel. We are concerned that the removal of the requirement for tick treatments has increased the risk of UK exposure to tick species not native to the UK and the potentially zoonotic vector-borne disease they may carry. This has been demonstrated by canine babesiosis cases in Essex in 2016, including one report of an autochthonous case.<sup>21</sup> 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, BVA calls on the UK Government to reintroduce tick treatments for all cats and dogs travelling under the Pet Travel Scheme.

**Recommendation 3: The UK Government should reintroduce compulsory tick treatments for all dogs and cats travelling under the Pet Travel Scheme. Consideration should also be given to reintroducing compulsory tick treatments for ferrets as per previous requirements under the Pet Travel Scheme.<sup>22</sup>**

### **Introducing tapeworm treatment for cats as well as dogs and shortening the tapeworm treatment window**

At present under the Pet Travel Scheme only dogs entering the UK, Ireland, Finland, Norway or Malta 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. 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. 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.<sup>23</sup>

**Recommendation 4: The UK Government should introduce tapeworm treatment for cats as well as dogs under the Pet Travel Scheme. Consideration should also be given to reintroducing tapeworm treatments for ferrets as per previous requirements under the Pet Travel Scheme.<sup>24</sup>**

**Recommendation 5: To protect the UK's *Echinococcus multilocularis* (EM)-free status, the tapeworm treatment window of 24-120 should be shortened to 24-48 hours before entry into the UK from infected countries.**

### **Extending the waiting time post-rabies vaccination to 12 weeks**

BVA supports 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 extended incubation period for rabies (see below) and has the potential to reduce the

<sup>21</sup> Johnson, N. , 2016. Tracing disease emergence: canine babesiosis in the UK. *Vet Rec.* 179: 356-357 doi: 10.1136/vr.i5372

<sup>22</sup> Defra, 2017. The Pet Travel Scheme. Advice to veterinary surgeons in GB: ferrets. Available at: [http://webarchive.nationalarchives.gov.uk/20090731224433/http://www.defra.gov.uk/animalh/quarantine/factsheet/ukvet\\_sferretfactsheet.pdf](http://webarchive.nationalarchives.gov.uk/20090731224433/http://www.defra.gov.uk/animalh/quarantine/factsheet/ukvet_sferretfactsheet.pdf)

<sup>23</sup> EFSA Panel on Animal Health and Welfare (2015). Scientific opinion on *Echinococcus multilocularis* infection in animals. *EFSA Journal* 2015;13(12):4373, 129 pp. doi:10.2903/j.efsa.2015.4373 [online] Available at: <http://onlinelibrary.wiley.com/doi/10.2903/j.efsa.2015.4373/epdf> [Accessed 3 August 2017]

<sup>24</sup> Ibid.

misuse of non-commercial routes for the illegal imports of puppies for sale as the puppies will be older and past their most saleable age). This approach therefore has the potential reduce the negative welfare implications for puppies imported via this route<sup>25</sup> and the likely negative welfare experienced by the breeding bitches supplying these puppies.

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.<sup>26</sup> However we would question how appropriate a 21 day period is.<sup>27</sup> 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 conditions<sup>28</sup>. Further, if the wait time were to be extended to 12 weeks post-first vaccination at 8 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.

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 an 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.<sup>29</sup> 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.<sup>30,31,32, 33, 34</sup>. 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.

**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,

<sup>25</sup> Dogs Trust, 2017. Puppy Smuggling – A Tragedy Ignored [pdf] Available at: <https://www.dogstrust.org.uk/puppy-smuggling/ps-media>

<sup>26</sup> 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."

<sup>27</sup> 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..

<sup>28</sup> Dogs Trust (2017) Puppy Smuggling – A Tragedy Ignored [pdf] Available at: <https://www.dogstrust.org.uk/puppy-smuggling/ps-media>

<sup>29</sup> Greene, 2012. *Infectious Diseases of the Dog and Cat*. 4 ed. s.l.:Elsevier

<sup>30</sup> 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

<sup>31</sup> Fekadu 1988 Pathogenesis of rabies virus infection in dogs *Review of infectious diseases* 10 4 Nov-Dec 1988

<sup>32</sup> 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>

<sup>33</sup> Rupprecht, C.E., 'Overview of Rabies' in *MSD Veterinary Manual*. Available at: <https://www.msddvetmanual.com/nervous-system/rabies/overview-of-rabies>

<sup>34</sup> Defra, 2011. Rabies Disease Control Strategy. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69523/pb13585-rabies-control-strategy-110630.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69523/pb13585-rabies-control-strategy-110630.pdf)

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<sup>35,36</sup> 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.<sup>37</sup> 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 in terrestrial animals)<sup>38</sup> by 780 percent (239 to 2102) between 2011 and 2013.<sup>39</sup>

It is also important to recognise that Pet Travel Scheme rules specify that dogs who are moved for the sole purpose of a change of ownership must be transported under commercial movement rules (the Balai directive) and those involved in the rescue or rehoming of abandoned or stray dogs from abroad (individual or UK-registered charities) do not have an exemption from these requirements. We therefore question whether it is appropriate to be moving stray dogs with unknown health histories from rabies-positive countries and countries with diseases not endemic for the UK. Ultimately, the wider consequences for the UK dog population should outweigh the benefit to the individual animal being imported.

**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, dirofilarial, 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**

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<sup>35</sup> Boyden, P, 2015. What is the true risk of imported dogs to the UK? *Vet Rec.* 2015 Jun 27;176(26):670-1. doi: 10.1136/vr.h3344.

<sup>36</sup> Day, M, 2010. *Veterinary Immunology: Principles and Practice*, Second edition

<sup>37</sup> AHVLA figures cited in *Vet Times*, 2013. Pet travel changes – good for owners... but what about pets? Available at: <https://www.vettimes.co.uk/app/uploads/wp-post-to-pdf-enhanced-cache/1/pet-travel-changes-good-for-owners-but-what-about-pets.pdf>

<sup>38</sup> Public Health England, 2017. Rabies risks in terrestrial animal by country. [online] Available at: <https://www.gov.uk/government/publications/rabies-risks-by-country/rabies-risks-in-terrestrial-animals-by-country#>

<sup>39</sup> Dogs Trust. The Puppy Smuggling Scandal: An investigation into the illegal entry of dogs into Great Britain under the Pet Travel Scheme. Available at: [https://www.dogstrust.org.uk/press-materials/dt\\_puppy\\_smuggling\\_report\\_v12\\_web\(1\).pdf](https://www.dogstrust.org.uk/press-materials/dt_puppy_smuggling_report_v12_web(1).pdf). Percentage increase figures obtained from a Defra response to PQ 1934 13/14 about the number of dogs entering Great Britain under the EU pet travel scheme (998/2003) on approved carriers between 2000 and 2013. This data was retrieved from the Pets Database on the 4th February 2014.

covered by PETS and those not considered as endemic for the UK eg. brucellosis, babesia, ehrlichia, dirofilarial, 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.**

## Strengthening enforcement provisions

Enforcement of the Pet Travel Scheme is crucial to effectively regulate pet movements and to achieve this councils require adequate funding to allow for consistent and effective inspections at ports, including out-of-hours and weekend cover.

Given that the number of movements of dogs per year has significantly increased year on year since the introduction of the Pet Travel Scheme in 2011 (an increase of 85,786 dogs in 2011 to 152,075 in 2013, 164,836 in 2015 and 275,876 in 2016)<sup>40</sup> we are concerned that this has outstripped resources available to check and enforce pet-travel legislation, increasing the risk of non-compliance.

We are also concerned that enforcement provisions for the Pet Travel Scheme are not fully appropriate, leading to abuse of the scheme and increased illegal imports. The main areas of concern are fraudulent documentation, puppies being moved under the pet travel scheme when they are intended for sale (as it is possible to move five puppies per person non-commercially, it is possible for two or three people to bring in 10-15 puppies in this manner), and underage puppies.<sup>41</sup> With this in mind, we would strongly support restricting 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).

Enforcement provisions should also be improved and we would question whether the carriers are the right people to undertake routine checks. Authorised officers may benefit from veterinary-delivered training or guidance, including guidance on dentition checks if the age limit is raised to 15 weeks. Moreover, we believe the verification procedure itself should be revised to ensure that an enforcement officer must see the animal when scanning for a microchip and ensure that any microchips placed external to a puppy in its carrier are not scanned. In addition, it should be 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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<sup>40</sup> Dogs Trust, 2017. Puppy Smuggling – A Tragedy Ignored [pdf] Available at: <https://www.dogstrust.org.uk/puppy-smuggling/ps-media>

<sup>41</sup> Ibid.

**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.

## 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 34,017<sup>42</sup>, with some illegal importers transporting pets under the Balai Directive and commercial routes due to increased scrutiny of illegal imports through the Pet Travel Scheme<sup>43</sup>. 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.<sup>44</sup> 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.

## Supporting vets to report suspected illegal imports and non-compliance

In terms of monitoring and reporting the illegal importation of pets, veterinary surgeons in the UK are required by the [RCVS Code of Professional Conduct](#) to ensure the health and welfare of animals committed to their care:

*'Veterinary surgeons must make animal health and welfare their first consideration when attending to animals.'*

In addition, under the [RCVS Code of Professional Conduct](#) the veterinary profession can disclose information to the authorities where it is deemed necessary:

*'In circumstances where the client has not given permission for disclosure and the veterinary surgeon or veterinary nurse considers that animal welfare or the public interest is compromised, client confidentiality may be breached and appropriate information reported to the relevant authorities. Some examples may include situations where an animal shows signs of abuse; where a dangerous dog poses a risk to safety; where child or domestic abuse is suspected; where there is*

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<sup>42</sup> <https://www.parliament.uk/business/publications/written-questions-answers-statements/written-question/Lords/2017-01-09/HL4462>

<sup>43</sup> Dogs Trust, 2017. Puppy Smuggling – A Tragedy Ignored [pdf] Available at: <https://www.dogstrust.org.uk/puppy-smuggling/ps-media>

<sup>44</sup> Ibid.

*some other significant threat to public health or safety or to the health or safety of an individual; or where the information is likely to help in the prevention, detection or prosecution of a crime.*

*If a client refuses to consent, or seeking consent would be likely to undermine the purpose of the disclosure, the veterinary surgeon or veterinary nurse will have to decide whether the disclosure can be justified. Generally the decision should be based on personal knowledge rather than third-party (hearsay) information, where there may be simply a suspicion that somebody has acted unlawfully. The more animal welfare or the public interest is compromised, the more prepared a veterinary surgeon or veterinary nurse should be to release information to the relevant authority.'*

Legislation relating to client confidentiality and data protection also supports veterinary surgeons in their decision to provide information to the authorities, namely [Section 170 of the Data Protection Act 2018](#), which provides an overlapping exemption to offences relating to personal data where any disclosure is necessary for 'the purposes of preventing or detecting crime.'

## How to report suspicions of illegal importation or non-compliance

Vets wishing to report suspicions of illegal importation or smuggling should report the suspected non-compliance to their local [Trading Standards Office](#). Vet wishing to report any concerns regarding the checks undertaken for compliance with the EU Pet Travel Scheme by carriers (eg. ferries or airlines) should contact the [APHA Pet Travel Scheme](#) via email, detailing as much as possible, including the route travelled, the carrier and the time of presentation for checks. [BVA has produced a guidance note for vets on how to report concerns of non-compliance with the pet travel scheme.](#)

BVA's Voice of the Veterinary Profession survey, which surveyed over 1,000 vets from across the UK, revealed that in 2016 almost a third of companion animal vets surveyed had concerns regarding the illegal importation of dogs. However, some vets also told us that they felt that they were unable to report these concerns to Trading Standards due to a lack of evidence to substantiate suspicions. In addition, others commented that they found it 'difficult' or 'very difficult' to report their concerns to Trading Standards, with some unable to find the correct point of contact and others reporting that Trading Standards appeared 'unconcerned' in following up on this type of case. With these concerns in mind, routes and mechanisms for reporting suspected illegal importation of animals and non-compliance with the Pet Travel Scheme should be more clearly defined, with improved accessibility to out-of-hours.

**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.**