

BVA response to EFRA Committee Call for evidence: Moving animals across borders

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, animal welfare, public health, regulatory issues and employment matters.
- 2) We welcome the opportunity to provide our evidence to this inquiry on moving animals across borders as vets have an interest in all animal movements, regardless of species.
- 3) Live animals may carry pathogens that can represent a threat to public health and the health of animal populations. Sanitary and phytosanitary (SPS) measures are those measures to protect humans, animals, and plants from diseases, pests, or contaminants. SPS measures form a vital part of the biosecurity framework and should not be seen solely as a barrier to trade that needs to be overcome. In the broadest sense, biosecurity can be said to cover every aspect of disease control, prevention and treatment, all of which are areas that rely upon the knowledge and skill of veterinary professionals.
- 4) The vital role of veterinary surgeons in trade, protecting public health, food safety and animal health and welfare is recognised around the world. Veterinary certification and controls form a vital part of the biosecurity framework for the UK and our trading partners.

1. Does the UK have sufficient resources and capacity to certify, record and inspect animal movements across its borders?

- 5) To facilitate the movement of live animals across borders, the UK needs enough veterinary surgeons with the requisite qualifications to meet the additional demands for export and import certification and controls that are now required following the end of the transition period. If that requirement is not fulfilled, it presents a significant barrier to trade.
- 6) Leaving the Single Market means exporters require an Export Health Certificate (EHC) signed by an Official Veterinarian (OV) to transport animals from Great Britain (GB) to the EU Single Market and Northern Ireland (NI). There is also a requirement for additional certification of pet travel and equine movements. The OV stamp and signature attests that relevant public health, animal health and animal welfare requirements have been met. The certificate must then travel alongside the consignment where they will enter the Single Market via a designated border control post (BCP) for documentary, identity, and physical checks by veterinary surgeons.
- 7) Additional veterinary capacity will be needed in GB to fulfil this demand alongside the demand for the certification of products of animal origin. It is still too early to tell if the UK has sufficient veterinary capacity to do this. Thus far, veterinary capacity has not yet been a barrier and we welcome the work that has been done by government to increase that capacity. However, many operators are still waiting and delaying some of their exports.
- 8) Our understanding from discussions with the UK government, EU contacts and industry is that during January exports have been well below the level that would typically be expected.¹ Engagement with French authorities has provided that in the first few days of January, traffic in the GB-France direction was only 30% of its usual amount, and it is at approximately 60% as of 14 January 2021. However a large percentage of the lorries were arriving in France empty. The proportion of batches that require SPS checks is around 5%, compared to 10% in usual times.

¹ UK trade - Office for National Statistics (ons.gov.uk)

- 9) As mentioned above consignments must enter the EU Single Market through a designated BCP. However, at present there are no BCPs designated for the purposes of live livestock at EU mainland ports with direct routes from GB. Consequently, the numbers of EHCs for live livestock are less than would be expected with a suitable entry point to the single market.
- 10) Further demands for additional veterinary capacity in GB to sign EHCs are expected in particular in relation to movements between GB and NI. It is also known that new EU EHCs will need to be operational by 21 April 2021. These new EHCs will also increase the demand for EHCs as they will remove an exemption currently in place for certain composite goods.

Ensuring EHCs are accepted consistently.

- 11) An EHC that has been signed by an OV to transport live animals from GB to the EU Single Market will enter the Single Market via a designated border control post (BCP) for documentary, identity and physical checks by veterinary surgeons. Efforts have been undertaken by government and certifying vets to ensure UK EHCs are accepted consistently across EU BCPs and the movement of goods continues.
- 12) Senior Defra and APHA staff have attended regular meetings with OVs to determine capacity issues and identify any concerns regarding EHCs. These concerns are then raised by government with individual BCPs and the EU Commission to ensure consistency. As appropriate, the guidance to GB OVs and Member State BCPs is updated to ensure the advice to exporters is correct. This process has improved, however, there remain significant problems with the completion of EHCs, both in interpreting the requirements and with inconsistencies in interpretation and implementation at BCPs.
- 13) The utility of these clarifications may be short lived. The Animal Health Law, which was adopted by the EU in 2016, will be implemented from 21 April 2021. As a result, a new set of EU EHCs will be required. The model certificates have been published in the Official Journal of the EU.² These new certificates will need to be made available on the Export Health Certificates Online (EHCO) system and accompanying Notes for Guidance provided to OVs. As the new certificates are used, new interpretation issues will emerge. This will add new delays to exports until further clarifications can be agreed between the UK and EU and updated guidance provided.
- 14) Longer term the government could seek to work with the EU to simplify the documentation requirements and processes. This should be an ambition of the Trade Specialised Committee on Sanitary and Phytosanitary Measures. The membership and scope of this specialised committee is not yet known. However, it is essential that across all sectors industry and the veterinary profession are engaged to identify potential solutions to bring to the specialised committee.

Imports

- 15) As GB has now left the EU Single Market, it now holds the competence to design its own official controls regime. It is essential that the veterinary profession is engaged in this process to ensure animal health, animal welfare and public health are upheld. Exploring the opportunities presented by new technology, amongst other things, will help the workforce to operate efficiently and effectively.
- 16) There will also be the need for OVs to perform import checks once sanitary controls are applied on imports into GB from the EU. On 11 March 2021, a new timetable for introducing import border control processes was set out by the government.
- 17) Under the changes, EHC requirements for Products of Animal Origin (POAO) coming into the UK will be moved from 1 April to 1 October 2021. SPS checks on POAO will now not be required

² https://eur-lex.europa.eu/eli/reg_impl/2020/2235/oj

until January 2022, at which point they will take place at BCPs. From March 2022, checks at BCPs will take place on live animals.

- 18) While these changes may provide some welcome breathing space for industry, they are being introduced at a late stage when vets have been working hard to make preparations for a new raft of requirements being introduced in only three weeks' time. At a time when there are ongoing concerns about veterinary capacity, greater notice is needed to adjust to new demands and shifting timetables. It's essential that we now use this additional time to put clear plans in place.
- 19) At this stage more certainty is needed. Putting in place this infrastructure and staff will require a significant amount of time and resource. BCPs will need to be approved for the specific type of commodity that will move through them. For example, for a BCP to be designated for live animal imports it will require specific infrastructure.
- 20) On Friday 2 October 2020 the government launched a £200 million fund for ports to bid on to build new facilities. Reporting from the Financial Times has noted concerns from port operators that this funding may be inadequate in practice.³
- 21) GB can learn from the experience of neighbouring states have prepared border Sanitary and Phytosanitary infrastructure and staff to comply with imports from GB. Ireland has been required to have BCPs in place since January 2021. The Irish Government agreed sites and plans in 2018 and were preparing to hire "in the region of 200 extra full-time staff to carry out Sanitary and Phytosanitary Controls (SPS) checks and controls at ports and airports." A sizeable number of this cadre will be OVs, but there will be phytosanitary staff and support staff included in this number. In the Netherlands, there were plans, reported in 2018, for an additional 145 veterinarians for the Port of Rotterdam ahead of a previous potential no deal.
- 22) Recently, the government announced £14 million in funding has been given to local authorities across England to help them maintain the UK's high standards on imported animal products. "Over 500 new port health roles are being created to facilitate the new checks on imports of animal products from the EU from April 2021." Not all of these reported 500 personnel will need to be qualified official veterinarians (OVs), but it is likely that a significant number will be OVs.
- 23) In GB there are very limited numbers of OVs that have the required training to function as OVs at BCPs. It is likely that Port Authorities will be seeking to source private OVs from existing certification businesses, further reducing the availability of experienced export OVs in the supply chain.
- 24) We are also seeking reassurances that delays to import checks will not impact on our ability to protect the UK from disease incursion. These checks form a line of defence to help protect against diseases not currently present in the UK, such as African Swine Fever. This is particularly important as the UK currently does not have access to the range of EU disease surveillance and cooperation systems.

2. How effectively will the UK be able to conduct animal disease surveillance and respond to outbreaks?

- 25) The UK enjoys a good animal health status and high standards of animal welfare, and maintaining this, particularly in light of leaving the EU, requires a continuing commitment to effective veterinary surveillance, comprehensive disease preparedness and sophisticated and scalable responses to incidents and incursions.
- 26) As members of the EU, the UK benefited from systems that monitor new and emerging disease through data collection, analysis and sharing across species. This provided high-quality

³ Financial Times, Building of Brexit border posts faces delays, Peter Foster, January 25 2021
<https://www.ft.com/content/82dab12c-380a-450b-b7f7-c47a56102c66>

intelligence on animal health and welfare that enabled policy makers, veterinary professionals and animal keepers to take decisions to improve animal health and welfare, productivity, and identify and manage threats to public health, trade, food quality, the environment and leisure and tourism.

- 27) The withdrawal of the UK from the EU will have far-reaching implications on the UK's biosecurity. EU legislation, structures and institutions were embedded within the UK biosecurity framework; underpinning surveillance, disease preparedness, outbreak response procedures and control and eradication programmes.
- 28) Diseases do not respect political borders. Therefore, shared surveillance will continue to be a priority. Ongoing cooperation and collaboration with the EU will continue to be important. This will be particularly critical with respect to NI which will continue to share a land border with the EU. North-South cooperation has "enabled the island of Ireland to be treated in policy and operational terms as a single epidemiological unit for the purposes of animal health and welfare."⁴
- 29) In our response to the House of Lords EU Energy and Environment Sub-Committee inquiry on Brexit: plant and animal biosecurity we stated:

"To protect animal health, animal welfare, public health and to ensure trade, reciprocal surveillance data sharing with Europe and internationally must be maintained, and the UK must maintain effective and adequately resourced systems for detecting new and emerging diseases."
- 30) There was hope that the Trade and Cooperation Agreement (TCA) would in some way seek to maintain cooperation on this issue beyond the OIE baseline. However, the TCA Sanitary and Phytosanitary SPS chapter provides very little in this regard. Within the structures created by the TCA, there will be a "Trade Specialised Committee on Sanitary and Phytosanitary Measures" where the UK and EU can meet and discuss the operation of SPS arrangements. It is imperative that the UK government engages with industry and the veterinary profession on priorities that should be brought to the specialised committee.

3. What impact will the new UK-EU agreement have on moving animals across the Irish border and between GB and the EU/Northern Ireland?

- 31) The Withdrawal Agreement concluded between the EU and UK on 17 October 2019 formalised the position that GB would be leaving the EU Single Market, as well as the unique position of NI within the Single Market for agri-food products and live animals.
- 32) GB leaving the Single Market means exporters require an Export Health Certificate (EHC) to transport animals from GB to NI. There is also a requirement for additional certification of pet travel and equine movements.
- 33) In most cases the purpose of a free trade agreement is to reduce trade friction. However, the deal reached between the UK and EU sought to manage additional trade friction. There was hope that the Trade and Cooperation Agreement (TCA) would in some way reduce the burden of the additional trade friction, reduce bureaucracy and limit the level of controls that would be required. However, the TCA Sanitary and Phytosanitary SPS chapter provides very little in this regard.
- 34) The UK Government has unilaterally announced a continuation of the grace period for EHC requirements for movements from GB to NI beyond 31 March 2021. The Scheme for Authorised Movements to Northern Ireland (STAMNI) arrangements for Authorised Traders will continue to be in place until at least 1 October 2021. This means Authorised Traders can continue to move

⁴ Department for Exiting the European Union, Northern Ireland and Ireland, 2017
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/638135/6.3703_DEXEU_Northern_Ireland_and_Ireland_INTERACTIVE.pdf

products of animal origin, composite products, food and feed of non-animal origin from GB to NI without the need for official certification. Government proposes to introduce certification requirements for authorised traders in phases from October 2021. The precise timing of subsequent phases is unknown but is expected to be dependent on the delivery of the Digital Assistance Scheme.

- 35)** Certification of live animals is not covered by STAMNI. Consequently, live animals have required EHCs to move from GB to NI since 1 January. Defra has introduced the Movement Assistance Scheme (MAS), to support traders and businesses in meeting new requirements for moving animals from GB to NI. Businesses and traders will not incur a cost for an EHC up to £150 excluding VAT for each non-equine EHC, or up to £500 excluding VAT for each equine EHC. Instead, government will directly reimburse certifiers through the MAS. Government is reviewing MAS to determine how to best provide ongoing support to traders. BVA are engaging with government on this review.
- 36)** EHCs are not required for movements of live animals from NI to GB. However, where animals move from NI to GB there will be a need for an EHC and a satisfaction of the requirements of that EHC in order to return to NI.
- 37)** As NI has remained within the EU Single Market for goods and will continue to follow EU law on agri-food, there is no need for additional certification on live animals as they move across the Ireland land border in both directions. The movement of live animals across the Irish land border is significant. The shared land border has resulted in the development of a highly integrated agri-food sector. According to figures from the Irish Farmers' Association, the scale of agri-food trade across the Irish land border is vast, annually:⁵
- Over 400,000 pigs are exported from the Republic of Ireland for processing in NI.
 - Almost 400,000 lambs are exported from NI to the Republic of Ireland for processing.

4. How should the Government balance animal health and welfare alongside economic interests?

- 38)** It is fair to consider the balance between the interests of consumers and businesses. However, public health, animal health and animal welfare should not be compromised to support business interests. It is also important to draw the contrast between short term and long term business interests. While it may save money in the short term to remove official controls, the economic impact of a new notifiable disease entering the UK (eg African Swine Fever) would be devastating.
- 39)** Many surveys indicate that UK citizens wish to see improvement in the welfare of farmed animals.⁶ In a 2010 survey of 600 people in GB, 96% agreed that we have a moral obligation to safeguard the welfare of animals.⁷
- 40)** According to a Which? survey of UK consumers, most of the UK public are against lower quality food being imported into the UK, even if it means a reduction in cost.⁸ 72% of respondents surveyed did not think food from countries with lower standards should be on sale in the UK. 79% would be uncomfortable eating beef produced with growth hormones, and 72% would be uncomfortable eating chlorine-treated chicken. The survey found people from lower socio-economic backgrounds, those who in theory would benefit most from greater affordability, were

⁵ Irish Farmers' Association, Brexit: The Imperatives for Irish Farmers & the Agri-Food Sector 2016

⁶ Eurobarometer. 2007. Attitudes of EU citizens towards animal welfare. Special Eurobarometer 270. http://ec.europa.eu/public_opinion/archives/ebs/ebs_270_en.pdf

⁷ Kehlbacher, A. 2010. Willingness to pay for animal welfare in livestock production. PhD Thesis. University of Reading, UK.

⁸ <https://www.which.co.uk/news/2020/06/why-labels-wont-protect-uk-food-standards-from-a-us-trade-deal/>

less likely than those from higher socio-economic households to believe food produced to lower standards should be available in the UK.

41) The British public have an expectation of high standards, and evidence would suggest they consider this a priority for trade policy. Furthermore, prioritising lower food costs within trade policy fails to recognise, that within the UK, food is more affordable than ever.⁹ The average British family spend on food and drink has fallen from 30% as a proportion of household income in the 1950s to less than 10% today.¹⁰ In fact, in the UK, food costs as a proportion of household income are amongst the lowest in the world, behind only the United States and Singapore.¹¹

42) High animal health and welfare standards provide an economic benefit. We welcomed the early pronouncements from the UK Government that it would seek to establish the UK's "unique selling point" as one of high animal welfare and high food safety standards.¹² The current Chancellor of the Duchy of Lancaster noted in his previous role as Secretary of State for Environment, Food and Rural Affairs:

"[P]eople know that high animal welfare standards and high environmental standards reinforce the marketability of our produce."¹³

Live animal exports

5. What impact will ending live animal exports for slaughter and fattening have on UK farmers, processors and other businesses?

43) We support the principle that all animals should be slaughtered as close to the point of production as possible, and recognise that, as outlined in the 2019 FAWC opinion on the welfare of animals during transport, in some cases animals are being transported past UK abattoirs to be slaughtered overseas.¹⁴

44) In our position on [the welfare of livestock during transport](#) we outline a number of principles to inform improvements to legislation. In summary:

- Any movement of animals will have a potential impact on their health and welfare. Whatever the type and scale of movement, the welfare of animals must be prioritised with the aim of reducing the impact of the movement as far as is reasonably possible.
- In order to achieve this, all those involved with moving animals must understand what is required of them in law, receive certified training and be encouraged to follow sector-specific good practice guidelines.
- Wherever possible, and paying due regard to scientific evidence regarding the relationship between journey times and welfare outcomes, animals to be slaughtered for food should be

⁹ <https://www.which.co.uk/news/2019/11/heres-how-our-food-prices-compare-to-30-years-ago-and-you-might-be-surprised/>

¹⁰ <https://www.nfuonline.com/news/latest-news/blog-headlines-over-food-prices-demonstrate-need-for-resilient-farming-sector/>

¹¹ <https://www.bbc.co.uk/news/business-45559594>

¹² Former Environment Secretary, Andrea Leadsom MP, speaking at NFU conference 2017, reported Farming UK <https://www.farminguk.com/news/UK-s-poorest-families-will-gain-from-Brexit-due-to-cheaper-food-imports-report-says_47334.html>

¹³ Michael Gove MP, Secretary of State for Environment, Food and Rural Affairs noted this giving evidence to the House of Lords Select Committee on the European Union Energy and Environment Sub-Committee

¹⁴ FAWC, 2019. Opinion on the welfare of animals during transport. Available at:

<https://gov.wales/sites/default/files/publications/2020-04/opinion-on-the-welfare-of-animals-in-transport-by-the-farm-animal-welfare-ommittee-fawc.pdf>

slaughtered as close to the point of production as possible.¹⁵¹⁶¹⁷¹⁸ No animal should be knowingly exported to a destination with unknown welfare standards or exported then raised in systems banned in this country. Neither should animal product from such animals be re-imported.

- BVA supports existing legal requirements (eg those derived from European Community Regulation 1/2005 and set out in the UK Welfare of Animals (Transport) Orders¹⁹²⁰ and Regulations²¹²²) that are in force to protect the health and welfare of livestock during transport.²³ It is essential that there is a well-defined set of animal health welfare standards that must be met for the **entirety** of the journey of animals being transported in this country and abroad. These minimum standards should be the same for all animals no matter the purpose of the export (for example if it is for breeding or fattening), in line with current legislation.
- BVA welcomes legislative improvements to safeguard the welfare of animals during transport. Any improvements should be evidence-based and informed by a welfare outcomes approach. However, it is important to emphasise, that any legislative improvements are only beneficial if they are effectively enforced.
- Any proposals to improve welfare during transport must give due consideration to how improvements would work for all of the UK administrations and the impact of unintended consequences on animal welfare and industry across the UK.

45) While we support Government's overall policy objectives to end excessively long journeys for slaughter and fattening and ensure slaughter as close to the point of production as possible, we are concerned that the proposal to ban live exports for slaughter and fattening is not an effective mechanism to deliver these outcomes. We also consider that there are occasions where it is necessary to export livestock for slaughter and fattening. We therefore do not support the proposal to ban live exports for slaughter and fattening.

46) We consider that the proposed ban would have a considerable impact on industry and adverse consequences for animal welfare. If the proposed ban on live exports for slaughter and fattening is progressed by government, it must be accompanied by consideration of, and mitigation for, any unintended adverse welfare consequences. Efforts should be made to work with industry to find practical alternatives to live export for slaughter and fattening.

Welfare and enforcement concerns

¹⁵ Defra: Transcontinental road transport of breeder pigs - effects of hot climates

¹⁶ Defra: Epidemiological study to identify acceptable maximum journey lengths for pigs whilst maintaining welfare

¹⁷ Defra: Review to appraise the evidence for acceptable temperature envelopes for horses, sheep, pigs, cattle and goats during transport

¹⁸ Mitchell, M.A. & Kettlewell, P.J.(2008) Engineering and design of vehicles for long distance road transport of livestock (ruminants, pigs and poultry). *Veterinaria Italiana*, 44 (1), 197:209

¹⁹ [The Welfare of Animals \(Transport\) \(England\) Order 2006](#)

²⁰ [The Welfare of Animals \(Transport\) \(Wales\) Order 2007](#)

²¹ [The Welfare of Animals \(Transport\) \(Scotland\) Regulations 2006](#)

²² [The Welfare of Animals \(Transport\) Regulations \(Northern Ireland\) 2006](#)

²³ As set out in [Welfare of Animals During Transport: Guidance on implementation in the United Kingdom](#): *The EU Regulation does not apply to the transport of animals when this is not in connection with an economic activity or to the transport of non-vertebrate animals. Non-vertebrates are animals such as insects, worms, crustaceans (e.g. crab, lobster), cephalopods (e.g. octopus, squid) and molluscs (e.g. shellfish, snails). However, a general duty of care provision protecting non-vertebrates and animals involved in non-commercial movements from injury or unnecessary suffering is included in domestic legislation (Article 4 of WATEO 2006 and parallel legislation in Scotland, Wales and Northern Ireland). **Anyone transporting animals must ensure that they are transported in conditions suitable for the species concerned.***

- 47) We are concerned that the proposal to end live animal export for slaughter and fattening oversimplifies the wider determinants of animal welfare during transport. Welfare conditions during transport should not be considered in isolation, and there should not be a disproportionate emphasis on journey duration. It is paramount that Government takes a holistic approach when considering animal health and welfare conditions at transport, including the wider determinants of welfare before, during and after transport, whether that be for slaughter, fattening or breeding.
- 48) Further detail is required as to how the proposed ban would be effectively enforced to ensure that there are no legislative loopholes. In this context, we are also concerned that if vets were expected to certify that animals were being exported for breeding or longer production, this proposal would put unrealistic demands on the certifying vet.
- 49) Effective enforcement of these proposals is particularly pertinent given that the 2019 FAWC opinion on the welfare of animals during transport identified that lack of consistent enforcement and policing was one of the key barriers to the successful implementation of the existing animal transport regulations to safeguard welfare.²⁴ Consideration should be given to how the enforcement of welfare in transport regulations could be better aligned between local authorities and APHA to ensure improved collaboration and consistent safeguarding of animal welfare.

Impact on movements in other parts of the UK

- 50) Any proposals to improve welfare during transport must give due consideration to how improvements would work for all of the UK administrations and the impact of unintended consequences on animal welfare and industry across the UK.
- 51) While we recognise that these proposals will not impact domestic movements of livestock within the UK, we are concerned that if a unified UK-wide approach is not agreed upon, banning exports for slaughter and fattening that leave from, or pass through, England and Wales could result in unintended consequences for the welfare of livestock exported from Scotland and NI.
- 52) The 2019 FAWC opinion highlighted that recent evidence showing that the motion at sea can cause increased stress in sheep and pigs, and that due to a lack of research it is not yet possible to determine maximum acceptable journey duration by sea.²⁵ We are therefore concerned that if live export for slaughter and fattening is permitted to continue from Scotland and NI, this may result in longer sea journeys for livestock with no evidence-based welfare safeguards for journey duration, as transporters will not be able to pass through England and Wales via road.

6. Does the UK have sufficient capacity to slaughter and process animals that are currently exported? If not, what could be improved?

- 53) It is not clear whether Government has conducted a UK-wide assessment of abattoir provision and capacity to ensure there are no adverse impacts in the UK on the welfare of animals during transport, at slaughter, or on-farm were there to be barriers to accessing slaughter facilities in a timely fashion. It is important to recognise that for species that are less commonly slaughtered in the UK eg. Horses and deer, the nearest licensed abattoir, with appropriately designed facilities and appropriately trained staff, may be a long distance away from the point of origin. The 2019 FAWC opinion on the welfare of animals during transport echoes this concern with the following recommendation:

²⁴ FAWC, 2019. Opinion on the welfare of animals during transport. Available at: <https://gov.wales/sites/default/files/publications/2020-04/opinion-on-the-welfare-of-animals-in-transport-by-the-farm-animal-welfare-ommittee-fawc.pdf>

²⁵ FAWC, 2019. Opinion on the welfare of animals during transport. Available at: <https://gov.wales/sites/default/files/publications/2020-04/opinion-on-the-welfare-of-animals-in-transport-by-the-farm-animal-welfare-ommittee-fawc.pdf>

“FAWC recommends that there is a review of the availability of abattoirs related to the points of production and particularly mindful of end-of-life requirement. This will identify where abattoirs need to be sited in order to meet the needs of farmers and to minimise journey times and thereby meet the welfare needs of animals.”²⁶

54) It is important to recognise that the total number of abattoirs in the UK has declined.²⁷ The 2020 APGAW report into the Future for Small Abattoirs in the UK examined data on throughput in this context and found that while the number of total abattoirs in the UK has reduced, throughput has remained largely the same. This reflects the rationalisation of the slaughter industry and a shift towards a centralised processing model, where larger abattoirs serve specific retailers, producers or quality assurance schemes. In addition, anecdotally we have heard that improved legislative standards, and those from retailers and assurance bodies, including for welfare, have required slaughter premises to replace or update their equipment in order to comply with these standards. This has led to some smaller premises closing due to financial pressures.

Domestic animals:

7. How will Great Britain leaving the EU Pet Travel Scheme affect both legal and illegal movements of animals between GB and the EU/NI

55) For the purposes of pet travel, NI is effectively within the EU Single Market. Consequently, requirements for moving from GB to mainland EU are largely the same as moving from GB to NI. However, we have had assurances from DAERA that pets entering NI from GB will not be subject to any checking until 1 July 2021.

56) There will be significant anomalies based on where the pet passport was issued rather than where the animal is resident. If travelling to the EU or NI from GB, owners of dogs, cats and ferrets can no longer use a pet passport issued in GB for travel to an EU country or NI. Pet passports that had been issued in an EU country will still be recognised. For NI issued UK Pet Passport, interim measures have been put in place. Practices in NI have been provided stickers to update NI pet passports to allow travel until a new style UK (NI) branded EU Pet Passport becomes available.

57) When travelling from GB to an EU country or NI, a pet will need:

- a microchip
- a valid rabies vaccination
- an animal health certificate (AHC) or a pet passport issued in an EU country or NI
- tapeworm treatment for dogs if travelling directly to Finland, Ireland, NI, Norway or Malta

58) Pets will need a new AHC for each trip to an EU country or NI from GB. Each AHC will be valid after the date of issue for:

- 10 days for entry into the EU or NI
- 4 months for onward travel within the EU
- 4 months for re-entry to GB

²⁶ FAWC, 2019. Opinion on the welfare of animals during transport. Available at:

<https://gov.wales/sites/default/files/publications/2020-04/opinion-on-the-welfare-of-animals-in-transport-by-the-farm-animal-welfare-ommittee-fawc.pdf>

²⁷ Sustainable Food Trust, 2018. A Good Life and a Good Death: Re-localising farm animal slaughter.

Available at: <https://sustainablefoodtrust.org/articles/a-good-life-and-a-good-death-re-localising-farm-animal-slaughter/>

- 59) Although there have been relatively few AHCs issued for pets to date, there are some issues arising including a lack of space to record all the required details of the rabies vaccination as well as timing issues regarding issuing relating to the rabies vaccination and owner declaration.
- 60) The UK has been “Part 2” listed by the EU Commission. The UK should endeavor to provide further assurance to the Commission of our low rabies disease risk in order to gain “Part 1” listing. This would remove the requirement for a new AHC for each instance of travel.
- 61) Travelling with pets is currently very limited due to Covid restrictions, so there is still no clear picture of how onerous or costly the new system will be for vets and owners. But we do know that this will be a lot more paperwork than the old pet passports, which will need to be filled out before each visit, and it will take time for vets to become familiar with the new requirements. Defra could do more to support OV’s who will be asked to complete this process. A helpful resource would be a new standard format for vaccination card as these currently do not naturally record the required evidence for completing an AHC.
- 62) We are aware that some concerns have been raised regarding pets which travel frequently between GB and NI requiring tapeworm treatment ahead of each movement to NI. Michael Gove MP has written to the European Commission proposing a common travel area for pets across the UK and Republic of Ireland.²⁸ While there is little detail provided for how this proposal would work in practice it could theoretically remove this requirement for these movements.
- 63) In terms of illegal movements there are currently no changes in the requirements for entering UK from Europe so unless further changes are carried out there is little reason to think that illegal movements will reduce.

8. Are the current rules and checks on the movement of domestic animals strong enough to prevent illegal activity? If not, what could be improved

- 64) The EU pet travel legislation which governs commercial and non-commercial movement of pets has been incorporated into domestic law as “retained EU law” under the European Union (Withdrawal) Act 2018. Since the UK’s departure from the European Union, entry requirements for commercial and non-commercial movements of pets entering GB from EU member states have therefore remained the same as those set out under the EU Pet Travel Scheme and the Balai directive.
- 65) However, we would strongly support the strengthening of pet travel legislation and enforcement provisions 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. through illegal importation of puppies or dogs with cropped.²⁹

Restricting number of animals that can travel under pet travel rules

- 66) The number of animals that can travel to GB under current pet travel rules should be restricted 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).
- 67) Under current controls on non-commercial movements, as it is possible to move five puppies per person, it is possible for two or three people to bring in 10-15 puppies in this

²⁸https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/957996/2020_02_02_-_Letter_from_CD_L_to_V_P_S%CC%8Cefc%CC%8Covic%CC%8C.pdf

²⁹ https://www.bva.co.uk/take-action/ear-cropping-campaign/?dm_i=3VUQ%2C196OA%2C1ZADBB%2C4IPVE%2C1

manner in one consignment and, in turn abuse legislation to bring in numerous puppies for commercial purposes.³⁰

Extending the waiting time post-rabies vaccination to 12 weeks

- 68) 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 route³¹ and the likely negative welfare experienced by the breeding bitches supplying these puppies.
- 69) 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.³² However we would question how appropriate a 21 day period is.³³ 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 conditions³⁴. 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.
- 70) 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.³⁵ 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.^{36,37,38, 39, 40.} Not least, the introduction of a 12 week wait time would align with

³⁰ Ibid.

³¹ Dogs Trust, 2017. Puppy Smuggling – A Tragedy Ignored [pdf] Available at: <https://www.dogstrust.org.uk/puppy-smuggling/ps-media>

³² 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."

³³ 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.

³⁴ Dogs Trust (2017) Puppy Smuggling – A Tragedy Ignored [pdf] Available at: <https://www.dogstrust.org.uk/puppy-smuggling/ps-media>

³⁵ Greene, 2012. *Infectious Diseases of the Dog and Cat*. 4 ed. s.l.:Elsevier

³⁶ 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

³⁷ Fekadu 1988 Pathogenesis of rabies virus infection in dogs *Review of infectious diseases* 10 4 Nov-Dec 1988

³⁸ 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>

³⁹ Rupprecht, C.E., 'Overview of Rabies' in *MSD Veterinary Manual*. Available at: <https://www.msdsvetmanual.com/nervous-system/rabies/overview-of-rabies>

⁴⁰ 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

the current wait period for dogs coming into the UK from unlisted third countries of 12 weeks.

Strengthening enforcement provisions

Enforcement of non-commercial pet movement regulations

- 71) [Figures released from Defra earlier this year](#) demonstrate that the number of dogs imported to GB through the Pet Travel Scheme (PETS) remained broadly the same in between 2018 and 2019, with 307,263 being imported in 2019 compared with 307,357 dogs in 2018. However, this is a significant increase from 152,075 in 2013 and from 85,786 dogs pre-PETS in 2011. We note that 2018 was 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)^{41,42}.
- 72) Given that the number of movements of dogs per year has significantly increased year on year, we are concerned that the number of pets being imported (both commercially and non-commercially) has outstripped resources available to check and enforce compliance with pet travel legislation and detect illegal imports.
- 73) As outlined above, to tackle this we would strongly support restricting the number of animals that can travel as a non-commercial movement 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).
- 74) 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 for import is raised to 24 weeks.
- 75) 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 are checked at the point of entry to confirm that they match the information in their pet passport and are not underage.

Enforcement of commercial pet movement regulations

- 76) In addition, government figures suggest that the commercial imports of pets in 2020 increased. In response to a [parliamentary question](#)⁴³, the government reported that the number of licenses issued for the commercial import of pets (Intra-Trade Animal Health Certificates (ITAHCs)) issued for dogs entering the UK between June – August 2020 was 12,733⁴⁴. According to the RSPCA, this is more than double that for the same period in 2019, where 5,964 ITAHCs were issued.⁴⁵

⁴¹ Dogs Trust, 2017. Puppy Smuggling – A Tragedy Ignored [pdf] Available at: <https://www.dogstrust.org.uk/puppy-smuggling/ps-media>

⁴² Dogs: Imports:Written question – 254873 <https://www.parliament.uk/business/publications/written-questions-answers-statements/written-question/Commons/2019-05-15/254873>

⁴³ <https://questions-statements.parliament.uk/written-questions?SearchTerm=+Intra-Trade+Animal+Health+Certificates+&DateFrom=19%2F12%2F2019&DateTo=31%2F03%2F2021&AnsweredFrom=&AnsweredTo=&House=Bicameral&Answered=Any&Expanded=False>

⁴⁴ The number of Intra-Trade Animal Health Certificates (ITAHCs) issued for dogs entering the UK in June 2020 was 3,967, in July 2020 was 4,850 and in August 2020 was 3,916.

⁴⁵ <https://www.rspca.org.uk/-/news-puppy-imports-more-than-double-during-summer>

77) We are concerned that some illegal importers are now opting to transport pets under the Balai Directive as a commercial movement, due to increased scrutiny of illegal imports through the Pet Travel Scheme. When the UK was a member of EU under the Balai directive compliance checks were only required at the points of origin and destination as opposed to at the ports, and less than 10% of consignments were checked at the place of destination.⁴⁶

78) However, we note that, while entry requirement for commercial imports of pets remain the same as those set out in the Balai Directive, Border Control Post checks will be required for imports from the EU from July 2021. The introduction of checks at Border Control Posts therefore presents an ideal opportunity to improve the frequency of compliance checks and identification of non-compliances with commercial pet travel regulations.

Additional recommendations to strengthen controls

79) 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 on our website:

- The UK Government should reintroduce compulsory tick treatments for all dogs and cats travelling to GB. Consideration should also be given to reintroducing compulsory tick treatments for ferrets as per previous requirements under the Pet Travel Scheme.⁴⁷
- The UK Government should introduce tapeworm treatment for cats as well as dogs travelling to GB. Consideration should also be given to reintroducing tapeworm treatments for ferrets as per previous requirements under the Pet Travel Scheme.⁴⁸
- 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.
- 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 rules to prevent the movement of dogs for the sole purpose of a change of ownership through non-commercial routes.

⁴⁶ Ibid.

⁴⁷ 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/ukvetsferretfactsheet.pdf>

⁴⁸ Ibid.

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

Equines

9. What impact will the EU Animal Health Law have on the movement of equines between GB and the EU/NI from April 2021

10. Will the rules and checks on the movement of equines be strong enough to prevent illegal activity? If not, what could be improved?

- 80) Equine movements will also place additional demands on veterinary capacity. All equines travelling from GB to the EU or NI require an EHC signed by an OV for each journey to the EU. Equines need to have been tested for the relevant diseases before completing the process to obtain an EHC, as the OV will need this information to certify an equine for travel.
- 81) The time required to complete the current certificates, around 1-3 hours, can be off-putting OVs. This is exacerbated by the EU BCPs not accepting the completed EHCs. The certificates also often require additional amendments upon signoff 12-24 hours before departure. This has led to increased costs and delays. This is immensely stressful for OVs as they are often caught between clients and the unclear and inconsistent requirements of EU BCPs. It also has the additional consequence of OVs having less time to carry out their normal day to day work of treating horses.
- 82) Before an equine can be certified for travel and be issued an EHC, equines will need to be tested for the absence of certain diseases:
- equine infectious anaemia – within 90 days before travel for temporary exports (of under 90 days) for horses registered with a national branch of an international body for sporting and competition purposes, or within 30 days before travel for permanent exports and all other temporary exports.
 - equine viral arteritis – within 21 days of travel for uncastrated male equines older than 180 days, unless they meet vaccination requirements.
- 83) Furthermore, before temporary export (less than 90 days) of a horse registered with a national branch of an international body for sporting or competition purposes, owners will need to keep it on a holding in the UK or a country with a similar health status either:
- for 40 days;
 - since its entry to the UK, if the animal was imported directly from the EU or a country with a similar health status to the UK less than 40 days before you export.
- 84) Before permanent export, or temporary export of any other equine, owners need to keep the animal separate from other equines that do not have equivalent health status for at least 30 days.
- 85) Owners also need to keep the animal on a holding in the UK under veterinary supervision, or a country with similar health status either:
- for 90 days;
 - since birth if the animal is younger than 90 days old;
 - since its entry to the UK if the animal was imported directly from the EU less than 90 days before export.
- 86) The supervising vet does not need to be an OV. However, an OV must confirm that these requirements have been met before the export of the equine.
- 87) An EHC that has been signed by an OV will enter the Single Market via a designated border control post (BCP) for documentary, identity, and physical checks by veterinary surgeons.

Efforts have been undertaken by government and certifying vets to ensure UK EHCs are accepted consistently across EU BCPs. This is very similar to those outlined above for other EHCs.

- 88) Recently, senior Defra and APHA staff have attended regular meetings with equine OVAs to identify any concerns regarding EHCs. Both BVA and BEVA (British Equine Veterinary Association) sit on this group.
- 89) The Animal Health Law, which was adopted by the EU in 2016, will be implemented from 21 April 2021. As a result, a new set of EU EHCs will be required to be used. The model certificates have been published in the Official Journal of the EU.⁴⁹ These new certificates will need to be made available on the Export Health Certificates Online (EHCO) system and accompanying Notes for Guidance provided to OVAs. As the new certificates are used, new interpretation issues will emerge. This will add new delays to exports until further clarifications can be agreed between the UK and EU and updated guidance provided.

⁴⁹ https://eur-lex.europa.eu/eli/reg_impl/2020/2235/oj