BVA Non-traditional companion animal working group (NTCAWG)
Meeting 1 – Scoping and objectives
Wednesday 4 August 2021, 10.00-13.00
Zoom

Attendees
Sean Wensley - Chair
Matt Leach - EWAP representative
Daniella Dos Santos – BVA Officer
Justine Shotton – BVA Officer
Liz Mullineaux – BVZS
John Chitty – BSAVA
Craig Tessyman - BVNA
William Wildgoose - FVS

BVA
Hayley Atkin – Policy Officer
Sally Burnell – Director of Policy, Media and Strategy

Apologies
Romain Pizzi- BVZS
Alice Moore – Policy Committee representative
Amelia Findon – BVA Head of Policy and Governance

Welcome and introduction
1) S. Wensley welcomed attendees to the first meeting of the BVA Non-traditional companion animal working group which had been convened to develop the BVA position on non-traditional companion animals.

Scope and objectives
2) Aims/objective of the working group
Members discussed the desired objective of the working group, which was to develop an updated BVA position on non-traditional companion animals. In discussion it was agreed that:
   • The BVA position statement would be a useful opportunity to call for enhanced consideration for non-traditional companion animals, elevate their status and understanding of their needs amongst the public and veterinary professionals, and improve the standards in which they are kept and procured.
   • The convening of this working group was timely given Defra’s current consideration of positive lists, the proposed licensing regime for ownership of primates and the increased focus on human interactions with wildlife in the contexts of pandemic risk and biodiversity loss.
   • There remained a need to distinguish non-traditional companion animals from those more commonly kept, as NTCAs appear to be less valued by the public both in terms of financial value, and perception of their sentience. It was also felt that NTCAs were positioned differently to other companion animals within veterinary practice and veterinary education.

3) Definition of non-traditional companion animals
As a starting point, members were invited to consider the existing BVA, BSAVA, BVZS and FVS definition of non-traditional companion animals and agree whether this definition was fit for purpose or whether it should be amended. In discussion it was noted that:
   • For clarity, the definition should incorporate a list of those species or groups that would be excluded from the definition of NTCAs
   • Consideration should be given to how undergraduate veterinary curricula define non-traditional companion animals
While fish had previously been excluded from the BVA, BSAVA, BVZS and FVS definition, it was agreed that fish should be incorporated in the definition going forward. This was particularly important given the number of pet fish kept in the UK, the proportion of fish that were wild-caught for the pet trade (90% of ornamental marine fish and 5-10% freshwater fish)\(^1\), and to reinforce the recognition of fish as sentient creatures. It was accepted that it may be challenging to integrate discussion of fish into the working group's workplan and that these challenges would be addressed as they became clearer.

- BVZS had included rabbits in their recent update to their definition of NTCAs that their members provide care for. The definition included all animals except for cats, dogs, and farm animals.
- Rabbits were the third most commonly kept mammalian pet in the UK, so it was difficult to justify defining them as non-traditional. It was felt that in the UK rabbits were now traditionally kept by the public, however not traditionally treated by vets, and there was a gap in veterinary education around this. To address these issues BVA, BSAVA and BVZS had produced a separate piece of work to recognise the need to house rabbits in compatible pairs or groups and improve veterinary education, which could be cross referenced in the final policy document produced by the working group.
- The definition should not focus too heavily on the issue of domestication.
- There was a paucity of scientific evidence to underpin the welfare requirements of NTCAs when compared with those species that were more commonly kept as companion animals.
- Alongside a definition of NTCAs, it would also be important to define what the working group means by 'companion animal' within the policy document. The working group agreed that the document should make reference to the current Callisto definition, which was also supported by BSAVA:

  
  “[…] any domesticated, domestic-bred or wild-caught animals, permanently living in a community and kept by people for company, amusement, work (e.g. support for blind or deaf people, police or military dogs) or psychological support including dogs, cats, horses, rabbits, ferrets, guinea pigs, reptiles, birds and ornamental fish.”

4) Following this discussion, members agreed on the below definition of non-traditional companion animals:

*The term ‘non-traditional companion animal (NTCA)’ refers to all sentient companion animals\(^2\) that are not traditionally kept in the UK. The term excludes domestic cats, domestic dogs, domesticated equids, rabbits and species that are typically farmed.*

5) Scoping document: Remit and scope of outputs

Members were asked to consider the draft scoping document for the working group and consider if anything should be added or removed from the remit of the group. It was agreed that:

- The Zoo Licensing Act should be considered out of scope as Defra will be reviewing the model licensing standards towards the end of the year and BVA/BVZS will have the opportunity to input at this point. However, the final policy document should recognise that the different pieces of legislation regulating standards for NTCAs, such as the Zoo Licensing Act, was resulting in different welfare standards being applied across different settings.

\(^1\) Ornamental Aquatic Trade Association. Wild caught ornamental fish The trade, the benefits, the facts. Available at: https://wcof.ornamentalfish.org/

\(^2\) The Global Animal Law Project states that scientific research confirms that all vertebrates (fish, amphibians, reptiles, birds and mammals) are sentient animals and indicates sentience in some invertebrates. Evidence indicates that cephalopods (e.g. octopus, squid) and decapods (e.g. lobsters, crabs) are sentient, and are capable of experiencing pain and distress. Already the Animals (Scientific Procedures) Act 1986 Amendment Regulations 2012 (administered by the Home Office),\(^2\) includes “any living cephalopod” and animals in their “foetal, larval or embryonic form” within the category of protected animals.
• ‘Optimum environment v. legal minimum and Codes of practice’ should be amended to ‘Optimum captive environments and welfare assessments vs minimum legislative standards and statutory codes of practice.’ It was noted that the group should consider this in the context of the environment of evolutionary adaptation (EEA) and natural history of the species – and how these shape and inform captive requirements - as opposed to simply attempting to recreate conditions from the wild.

• The scoping document should reference local authority enforcement and inspection
• The scoping document should reference NTCAs kept or used for exhibition
• ‘Cost of veterinary care’ should be amended to ‘Availability of veterinary care and provision of emergency care to NTCAs’
• ‘Cost of specialist equipment’ should be amended to ‘Knowledge and use of specialist equipment for keeping and providing care for NTCAs’
• ‘When does a collection become a zoo?’ should be removed as this is clearly defined by the Zoo Licensing Act
• ‘Euthanasia of exotics’ should be amended to ‘Humane killing of exotics’

• Some of BVA’s priority animal welfare problems (eg. those specific to certain species) are applicable to NTCAs more generally, which should be reflected in the position

6) Scoping document: Existing policies and positions
Members identified that the BVA position on the recognition of animals as sentient beings, and the BVA, BSAVA and BVZS position on housing rabbits in pairs or compatible groups should be added to this section of the scoping document.

7) Scoping document: Consultees and other sources of evidence
Members agreed that the following consultees and sources of evidence should be added to the scoping document:
• PAAG, including online retailers such as Pets4Homes
• Pet Industry Federation (PIF)
• Italy and Norway – as countries who have banned keeping of NTCAs
• Germany – considered positive/negative lists for NTCAs and decided against them
• Higher Education Association – on use of NTCAs in colleges
• Local authorities/ Local Government Animal Welfare Group
• Heathrow animal reception centre – on transport conditions
• Ornamental Aquatic Trade Association, “Wild caught ornamental fish The trade, the benefits, the facts”.

Action: H. Atkin to implement amends to scoping document and circulate on Glasscubes for final agreement

Workplan and key principles

8) Workplan
Members supported the proposed work plan and agreed that an additional short meeting to discuss the role of the veterinary professions should be added. The final meeting schedule was agreed as follows:

• Meeting 2: Tuesday 28th September 11.00-15.00
  Keeping, breeding and sale of NTCAs currently kept without a licence

• Meeting 3: Tuesday 30th November 11.00-15.00
  Effectiveness of the Dangerous Wild Animals Act

• Meeting 4: Monday 13th December 10.00-13.00
  The role of the veterinary professions

• Meeting 5: Thursday 20th January 11.00-15.00
  Sustainability – wild caught NTCAs, environmental and human health impact,
international trade in NTCAs, welfare of animals produced for NTCA food

- Meeting 6: Tuesday 1st March 11.00-15.00
  Review of final position

Action: H. Atkin to recirculate meeting dates with additional meeting on the role of the veterinary professions on Glasscubes

9) Key principles
   As a starting point to guide the working group's discussions and outputs, members agreed the following key principles, which would be kept under review as the working group's thinking progressed.

Welfare requirements and legislative responsibility
- Non-traditional companion animals can have exacting husbandry requirements, and complex social, cognitive and nutritional needs.

- Under the UK Animal Welfare Acts all animal keepers and owners must ensure that they can meet the five welfare needs of the animals that they keep, these are: the need for a suitable environment; the need for a suitable diet; the need to be able to exhibit normal behaviour patterns; the need to be housed with, or apart from, other animals; and the need to be protected from pain, suffering, injury and disease.

- To have a Good Life all animals, including NTCAs, must have the opportunity to have positive experiences. Over time, positive experiences should outweigh negative experiences. This should encompass the whole of an animal’s life.

- To protect, advocate and enhance animal welfare, the welfare of sentient animals, including NTCAs, should be assessed using up-to-date concepts, tools and scientific approaches (such as the Five Domains Model of welfare assessment). This includes awareness and assessments of behaviour as both a welfare indicator and welfare determinant, and assessment of mental wellbeing.

- In the absence of scientific evidence on how to meet the welfare requirements of a specific species of NTCAs, evidence-based approaches to managing the welfare of similar species should be followed until more appropriate evidence becomes available. This approach is used under the Animals (Scientific Procedures) Act 1986.

Keeping, breeding and sale of NTCAs
- Non-traditional companion animals should only be kept, bred or sold if there is a reasonable expectation that their five welfare needs can be met and that they will have a Good Life. This should be based on a complete assessment of published evidence and practical knowledge and experience.

- There should be mechanisms in place to ensure that NTCAs are only kept, bred or sold where there is a reasonable expectation that their five welfare needs can be met and that they will have a Good Life. This should be based on a complete assessment of published evidence and practical knowledge and experience.

- Mechanisms to control the keeping, breeding or sale of NTCAs could include improved regulation (eg. positive lists), strengthened licensing regimes (eg. DWA), prohibiting ownership/breeding/sale

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unless for authorised breeding/conservation purposes, introducing mandatory conditions at point of sale eg. for social and solitary species, and improved public education.

- Where captive-breeding is carried out, it should be carried out responsibly, sustainably (not using wild-caught animals unless for limited purposes eg. conservation or genetic diversity) and without negatively impacting on animal health and welfare (eg. selective breeding for phenotypic variants (morphs), causing genetic disorders).

- There should be mechanisms to monitor and limit internet advertising and sales of NTCAs, such as those promoted by the Pet Advertising Advisory Group (PAAG)

**Transport**
- Measures should be taken to improve the welfare of NTCAs during transport
- There should be minimum standards for both commercial and non-commercial movements of NTCAs

**International trade in NTCAs**
- Importers and those who trade animals should be regulated in order to control the trade, increase traceability and improve animal health and welfare
- All commercial importers of captive-bred NTCAs should be licensed and required to meet minimum welfare standards during transport
- Consideration should be given to whether there is sufficient evidence to prohibit the import of certain wild-caught species to the UK (unless for legitimate and defined conservation reasons). NB BVA, BSAVA, BVZS and FVS currently support a ban on the import of wild-caught reptiles and amphibians to be kept as pets. The BSAVA do not support the keeping of wild caught animals of any species as companion animals, but acknowledges that there may be occasions when it is defensible to keep wild caught animals for conservation reasons.

**Sustainability**
- Consideration should be given to the wider impact of keeping NTCAs on wild populations and conservation (including the impact of wild capture and release of non-native species), public safety, and human and environmental health.
- Consideration should be given to the health and welfare of British wildlife that is caught in the wild, inappropriately kept as an NTCA, and those that are subsequently released back into the wild.
- Consideration should be given to the health and welfare of those animals kept and killed to produce food for NTCAs

**The role of the veterinary professions**
- Enhancing, protecting and securing the health and welfare of animals is the fundamental purpose of the veterinary professions. The veterinary professions should therefore work to advance the health and welfare of NTCAs at individual, community, national and international levels.
- The veterinary professions are animal welfare-focused, as distinct from client-focused or vet-focused. Improving animal welfare is the profession’s explicit aim and primary motivation – working with clients and animal-using industries, and being commercially viable, are enablers for the veterinary professions to improve animal welfare.
- The veterinary professions should be supported to manage and improve the health and welfare of NTCAs through undergraduate and post-graduate education, and access to appropriate veterinary medicines
Action: H. Atkin to circulate key principles on Glasscubes for agreement and work up into a ‘themes document’

Next steps
10) It was noted that at the next meeting the working group would be discussing the keeping, breeding and sale of NTCAs kept without a licence
11) BVA Secretariat would circulate the minutes of the meeting and produce a ‘Themes document’ to capture the working group’s discussions and conclusions for circulation on Glasscubes.

Date of next meeting
12) Tuesday 28 September 2021 11.00-15.00, via Zoom.