

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

14 October 2021

Who we are

1. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 18,000 members, our primary aim is to represent, support and champion the interests of the United Kingdom's veterinary profession. We therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.
2. Our response has been formulated in close liaison with the British Small Animal Veterinary Association (BSAVA), which exists to promote excellence in small animal practice through education and science and is the largest specialist division of BVA representing over 11,000 members.
3. We welcome the opportunity to feed into Defra's consultation on commercial and non-commercial movements of pets in Great Britain. We support the regulation of pet travel - both commercial and non-commercial - that enables the safe and legal movement of pets. Any movements must ensure that animal health and welfare, and public health, are protected, and travel routes are not abused for purposes that negatively impact on animal health and welfare (eg puppy smuggling, the legal importation of dogs from low welfare sources and the importation of stray dogs with unknown health status).
4. We are largely supportive of the proposals set out in this consultation. We strongly support efforts to restrict the low welfare and illegal puppy trade, as well as closing legal loopholes that allow the importation of dogs with mutilations which are currently illegal in the UK on animal welfare grounds.
5. However, as these proposals will only apply to Great Britain, we are particularly concerned that both puppy dealers and those importing dogs with illegal mutilations will be able bypass the additional legislative restrictions by transporting puppies and dogs through Northern Ireland and into Great Britain. While we recognise the political complexities surrounding Northern Ireland remaining in the single market, GB governments must give serious consideration as to how to prevent this legal loophole.
6. Further, government should use this opportunity to not only strengthen pet travel regulations on animal welfare grounds, but also to strengthen pet travel regulations to safeguard the health of our animals and the wider public. Therefore, in addition to the measures proposed in this consultation, we are calling on government to:
 - Reintroduce compulsory tick treatments for all commercial and non-commercial movements of cats and dogs;
 - Introduce tapeworm treatment for cats as well as dogs and shorten the tapeworm treatment window from 24-120 to 24-48 hours pre-import;
 - Extend the waiting time post-rabies vaccination to 12 weeks for all dogs; and
 - Address the movement of adult stray dogs for rehoming in the UK, including introducing mandatory, reliable, pre-import testing for dogs with unknown health histories from countries that have endemic diseases which are not currently considered endemic in the UK eg. brucellosis, babesiosis, ehrlichiosis, dirofilariasis and leishmaniasis

Increase the minimum age that dogs can be commercially and non-commercially moved into Great Britain from 15 weeks to 6 months

Question 1: to what extent do you agree or disagree that the government should increase the minimum age that dogs can be moved into Great Britain under the commercial rules from 15 weeks to 6 months?

7. We strongly agree with this proposal. Increasing the minimum age at which dogs can be moved into Great Britain has the potential to disrupt the supply of young puppies from low welfare sources as they will be past their most saleable age when they arrive in the country. In addition, it will be easier to determine a puppy's age through dentition checks at 6 months, which would facilitate the identification of non-compliances with this requirement. Therefore, increasing the age of importation has the potential to reduce the negative welfare implications for imported young puppies¹, reduce the likely negative welfare experienced by the breeding bitches supplying these puppies as part of low welfare breeding operations, and also improve enforcement.
8. We note that at present, APHA carry out post-import checks at destination on commercial pets from the EU on a risk-based approach. However, data from the Dogs Trust suggests that less than 10% of consignments are checked at the place of destination.² From late 2022, these checks will take place at the Border Control Posts (BCPs). This is an opportunity to strengthen post-import compliance inspections of commercial pet movements from the EU at BCPs by increasing spot checks to ensure that commercial routes are not being abused by illegal importers.

Question 2: to what extent do you agree or disagree that the government should increase the minimum age that dogs can be moved into Great Britain under the non-commercial rules from 15 weeks to 6 months?

9. We strongly agree with this proposal. Increasing the minimum age at which dogs can be moved into Great Britain has the potential to disrupt the supply of young puppies imported illegally via non-commercial routes and from low welfare sources as puppies will be past their most saleable age when they enter the country. In addition, it will be easier to determine a puppy's age through dentition checks at this age, which would facilitate the identification of non-compliances. This proposal therefore has the potential to reduce the negative welfare implications for imported young puppies³, reduce the likely negative welfare experienced by the breeding bitches supplying these puppies as part of low welfare breeding operations, and also improve enforcement.
10. Enforcement provisions of non-commercial pet movements should also be improved, and we would question whether authorised carriers are the right people to undertake routine checks. Authorised officers should receive veterinary-delivered training or guidance, including guidance on dentition checks if the age limit is raised to 6 months. 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 or in its collar or harness are not scanned. In addition, it should be ensured that puppies entering the UK match the information in their pet passport or similar internationally-recognised travel documents and are not underage.

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

² Dogs Trust, 2017. Puppy Smuggling – A Tragedy Ignored [pdf] Available at: <https://www.dogstrust.org.uk/puppy-smuggling/ps-media>

³ Dogs Trust, 2017. Puppy Smuggling – A Tragedy Ignored [pdf] Available at: <https://www.dogstrust.org.uk/puppy-smuggling/ps-media>

Question 3: To what extent do you agree or disagree that the government's proposed exception is appropriate (that the Secretary of State (or Ministers in Scotland and Wales) can permit the landing of a puppy if it is compliant with the health and documentary requirements for entry to GB and if evidence is provided that justifies that exceptional circumstances apply)?

11. We agree with this proposal based on the exceptions cited in the consultation document. However, Defra, Scottish Government and Welsh Government should produce clear and consistent guidance on what would constitute exceptional circumstances, the evidence required and how the process of applying for entry to Great Britain would work. This should then be put to stakeholders for further consultation before implementing this proposal.

Ban the commercial importation and non-commercial movement of dogs with non-exempted mutilations, specifically cropped ears and docked tails into Great Britain

12. While we are largely very supportive of these proposals, we wish to draw attention to the government's stated policy position that 'the government considers these practices [ear cropping and tail docking] to be unacceptable from an animal welfare perspective'. We therefore question why tail docking is permitted in limited circumstances across the UK for certain breeds of working dogs.
13. Tail docking is the amputation of the tail of a puppy under the age of 5 days without anaesthetic. Tail-docking involves the cutting through or crushing of skin, muscles, up to seven pairs of nerves, bone and cartilage. As the consultation document outlines, puppies (whether kept as pets or working dogs) suffer unnecessary pain as a result of docking and are deprived of a vital form of canine behavioural expression. Chronic pain can also arise from poorly performed docking.
14. Further, we consider that it is not possible to genuinely restrict tail docking to certain breeds of working dog. Under the current exemptions, evidence must be presented to the veterinary surgeon that the puppy is intended to work in one of the listed exempt activities set out in legislation. However, it is difficult for owners to assess the suitability of working dog at 5 days old or less, and the 'working' status of the dog is not checked or followed-up after the tail docking takes place to verify that it does in fact go on to be a working dog.
15. In addition, we note that it is usual practice for the whole litter to be docked while it is rare for all the puppies to go to working homes. Anecdotally, vets in practice are still seeing quite a few docked dogs, especially spaniels, which are not working dogs. They are declared as "working" so they can be docked as young puppies and then sold to non-working domestic homes.
16. Therefore, we support a complete ban on the tail docking of puppies for non-therapeutic reasons in the UK and current exemptions for certain breeds of working dog across the UK should be repealed.

Question 4: to what extent do you agree or disagree that the government should introduce a ban on the commercial movements of dogs with non-exempted mutilations into Great Britain?

17. We strongly agree with this proposal, and strongly oppose the practices of tail docking and ear cropping puppies.
18. As outlined above, we support a complete ban on the tail docking of puppies for non-therapeutic reasons in the UK. Puppies (whether kept as pets or working dogs) suffer unnecessary pain as a result of docking and are deprived of a vital form of canine behavioural expression. Chronic pain can also arise from poorly performed docking.
19. We are particularly concerned by the alarming rise in ear-cropped dogs, despite this mutilation being illegal. As outlined in the consultation document, ear cropping is an unnecessary, painful mutilation with no welfare benefit, carried out purely for cosmetic purposes (unless carried out prophylactically for dog fighting, which is an illegal activity in and of itself). The practice involves cutting off part of the ear flap, often without anaesthesia or pain relief. While it is illegal to crop dogs' ears in the UK, it's not illegal to

20. sell ear-cropped dogs or import them from abroad. These loopholes support ear-cropping of dogs being carried out abroad and permit the continued importation of ear cropped dogs into the UK for onward sale, normalising the procedure and in turn driving demand for this aesthetic. Furthermore, we believe this acts as a smokescreen for the illegal cropping of dogs in the UK.
21. Our members have reported a marked increase in the number of ear-cropped dogs that they are seeing in practice. In our 2021 [Spring Voice of the Veterinary Profession survey](#) (825 respondents), we found that:
- The majority (58%) of companion animal vets have been presented with dogs with cropped ears over the last 12 months.
 - Six in ten vets that had seen ear cropping (61%) felt the number of dogs with cropped ears they saw had increased over the last year while only one in four (25%) said it had stayed the same (23%) or decreased (2%), with the remainder (14%) unsure.
 - The breeds most commonly presented to vets with cropped ears were Dobermans, American Bulldogs and Cane Corsos.
 - Two thirds (64%) of vets that had seen ear-cropping in the last 12 months said some (46%) or most (19%) clients that presented ear-cropped dogs were aware it was an illegal mutation. Around one in seven vets who had seen ear cropping (15%) said that none of the clients were aware of this.
 - Vets gave a variety of reasons why clients choose ear cropped dogs, generally citing the appearance as attractive or fashionable. Some also mentioned that ear-cropped dogs are often imported or rescue dogs.

Question 5: to what extent do you agree or disagree that the government should introduce a ban on the non-commercial movement of dogs with non-exempted mutilations into Great Britain?

22. We strongly agree with this proposal, and strongly oppose the practices of tail docking and ear cropping. It is paramount that this ban applies to both the commercial and non-commercial movements of dogs to prevent the creation of an additional loophole that could be abused to facilitate the import of dogs with cropped ears into Great Britain.
23. In addition, prohibiting non-commercial movements of dogs with non-exempted mutilations will send a clear message that these procedures are unacceptable, and challenge the normalisation of these looks.

To what extent do you agree or disagree that the government's proposed exceptions are appropriate:

Question 6: where the prohibited procedure has been carried out on the dog by a veterinary surgeon or any other person permitted to carry out that procedure in an emergency for the purpose of saving the life or relieving the pain of the dog?

24. In the case of tail docking, we agree with this proposal as amputation of the tail or part of the tail may be necessary for therapeutic reasons e.g. if there is an injury to the tail. This exception should be certified by a veterinary surgeon in the country of origin and there should be a requirement for the veterinary surgeon to provide evidence that the procedure was carried out on therapeutic grounds (as opposed to prophylactically).
25. However, we do not agree with this proposal in relation to ear cropping. We see no therapeutic justification for ear cropping. Procedures required to treat severe ear disease or ear injury do not typically involve the removal of, or significant alteration to, the ear flap. In circumstances where a veterinary surgeon feels alteration or removal of part of the ear flap is necessary for therapeutic reasons, efforts would be made to maintain the normal structure of the ear as far as possible.

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

26. Unless it can be verified by a recognised process or criteria that a dog is a working dog (for example in the case of an older dog) we would strongly disagree with this proposal. Given that the new proposals intend to raise the age at import to six months it should be more feasible to ascertain if a young dog is intended as a working dog. On this basis we would suggest it more appropriate that all imported dogs are non-mutilated and that if intended as working dogs, following arrival in the UK the owner provides recognised proof in-line with the Mutilations (Permitted Procedures) (England) Regulations 2007 .⁴ Robust evidence would be required to demonstrate that the dog would go onto be a working dog in the UK and we consider that an owner declaration would not be sufficient and could be open to abuse.
27. Moreover, we support a complete ban on the tail docking of puppies for non-therapeutic reasons in the UK, for all breeds of dog. The UK governments should therefore repeal legislation that permits tail docking in certain breeds of working dog.

Question 8: the dog is an assistance dog (as defined under section 173 (1) of the Equality Act 2010)?

28. We agree with this proposal.

Question 9: Secretary of State (or ministers in Scotland and Wales) can permit the landing of a dog with a non-exempted mutilation if it is compliant with the health and documentary requirements for entry to Great Britain and if evidence is provided that justifies that exceptional circumstances apply?

29. We agree with this proposal based on the exceptions cited in the consultation document. However, to ensure exceptions do not create loopholes, for example in those instances of what could be considered working or assistance dogs, Defra, Scottish Government and Welsh Government should produce clear and consistent guidance on what would constitute exceptional circumstances, the evidence required and how the process of applying for entry to Great Britain would work. This should then be put to stakeholders for further consultation before implementing this proposal.

Question 10: the procedure was carried out before the prohibition comes into force?

30. We agree with this proposal. We support the suggestion that this should be demonstrated by the provision of veterinary evidence, including the date on which the procedure was carried out where possible (i.e. a rescue dog may not have this kind of clinical history, but a veterinary surgeon may be able to confirm that they were registered at their practice and had received this mutilation before the prohibition came into force). However, we would appreciate further clarification as to what type of 'veterinary evidence' will be required not least as vets in practice do have animals presented to them whereby the owner indicates that the animal had its ears cropped before they took ownership. We would wish to ensure that vets in practice are neither put in a difficult position regarding any verification requirements nor that they are expected to police the system.
31. In addition, we are concerned that if there is a long lead-in time to the prohibition coming into force, commercial operations may arrange for an increased number of puppies to be cropped or docked ahead of the legislation coming into force, so that they can continue to legally import these dogs for onward sale. Therefore, this exception should only apply to non-commercial movements of dogs.

Ban the commercial and non-commercial movements into Great Britain of pregnant dogs (dams) which are more than 42 days pregnant

Question 11: to what extent do you agree or disagree that the government should introduce a ban on the commercial movement into Great Britain of dogs, which are more than 42 days pregnant?

⁴ <https://www.legislation.gov.uk/ukdsi/2007/9780110757797/regulation/2>

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

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

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

Question 13: to what extent do you agree or disagree that the government should introduce a ban on the commercial movement within Great Britain (domestic movements) of dogs which are more than 42 days pregnant?

41. The reason for introducing this measure in GB is not entirely clear and further clarity is needed as to the intended objective and underpinning evidence before we are able to comment. We note that there are already restrictions on the commercial transport of pregnant dams in the last two weeks of pregnancy, except for visits to the vet.
42. In addition, we would recommend that further clarity is provided as to what would constitute a 'movement' under this proposal.

Enforcement

43. Improved enforcement for commercial movements
We note that at present, APHA carry out post-import checks at destination on commercial pets from the EU on a risk-based approach. Under this current system (in line with the Balai directive) we are concerned that compliance checks on movements from the EU are only required at the points of origin and destination as opposed to at the ports, and less than 10% of consignments are checked at the place of destination.⁵ With this in mind, we are concerned that the commercial movements from the EU are open to abuse by illegal importers and there are missed opportunities in the identification of non-compliance with commercial pet travel regulations.
44. We welcome the changes intended to be introduced from late 2022 when commercial movement compliance checks will take place at the Border Control Posts (BCPs). Defra should take this as an opportunity to strengthen post-import compliance inspections of commercial pet movements from the EU and increase compliance checks at BCPs to ensure that commercial routes are not being abused by illegal importers.
45. Improved enforcement for non-commercial movements
Enforcement provisions should also be improved for non-commercial movements. 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. We would ask that Defra and relevant authorities ensure there are enough resources to meet demand.
46. Northern Ireland
As these proposals will only apply to Great Britain, we are particularly concerned that both puppy dealers and those importing dogs with illegal mutilations will be able to bypass the additional legislative restrictions by transporting puppies and dogs through Northern Ireland and into Great Britain. While we recognise the political complexities surrounding Northern Ireland remaining in the single market, GB governments must give serious consideration as to how to prevent this legal loophole.
47. Enforcement by carriers
We would question whether the carriers are the right partners to undertake routine checks. Authorised officers should receive veterinary-delivered training or guidance, including guidance on dentition checks if the age limit is raised to 6 months. This would help them identify puppies that are less than 6 months of age. 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.

⁵ Dogs Trust, 2017. Puppy Smuggling – A Tragedy Ignored [pdf] Available at: <https://www.dogstrust.org.uk/puppy-smuggling/ps-media>

Question 15: to what extent do you agree or disagree with the government's proposal to introduce a seizure power that will allow the relevant authority to arrange for the detention of non-compliant animals in all cases, including where the owner is present?

48. We broadly agree with this proposal. However, we are concerned that it may be difficult to provide for the welfare of heavily pregnant and/or whelping bitches and their pups in kennel environments. Therefore, consideration should be given to whether home quarantine could be utilised to safeguard welfare.
49. With regard to re-export, we are concerned that this could lead to animals being re-exported when they are not fit to travel, and/or sent to end destinations where welfare standards would be lower than those in the UK. We note that the consultation document states that the relevant authority will ensure that safeguards are in place, including informing the competent authority in the country where the animal is being sent, to protect animal welfare. However, further information is required as to what these safeguards are before we are able to support the re-export of these animals.

Question 16: to what extent do you agree or disagree with the government's proposal to set out a 7-day detention period in law?

50. We agree with this proposal, however consideration will need to be given as to whether there is currently sufficient kennelling facilities, capacity and suitably trained and competent personnel available to implement this proposal.

Penalties

Question 17: to what extent do you agree or disagree that a maximum penalty for illegally landing a dog of 5 years in prison or an unlimited fine is appropriate?

51. We agree with this proposal. As the representative body for vets, detailed commentary on sentencing and penalties policy is outside of our remit. However, it is essential that penalties act as a sufficient deterrent against illegal importation and that they are proportionate to the offence, and, with this in mind our members are generally supportive of the proposed maximum penalty and unlimited fines.

Question 18: to what extent do you agree or disagree that monetary penalties would be a useful enforcement tool under this legislation?

52. We agree with this proposal. As the representative body for vets, detailed commentary on sentencing and penalties policy is outside of our remit. However, it is essential that penalties act as a sufficient deterrent against illegal importation and that they are proportionate to the offence, and, with this in mind our members are generally supportive of the use of monetary penalties as an enforcement tool for this legislation.

Cats

Question 19: to what extent do you agree or disagree with the government's proposal to retain existing requirements in relation to the commercial import and non-commercial movement of cats?

53. We agree with this proposal. We are not aware of evidence that commercial and non-commercial movement routes are being abused to facilitate illegal or low welfare trade in kittens or cats. It will be useful for GB governments to closely monitor the movement of cats once new legislation is implemented to ascertain whether illegal importers are transitioning to importing kittens and cats due to the additional legislative barriers that will be in force to restrict the illegal and low welfare puppy trade.
54. However, we would ask that similar to proposals intended for dogs with regard to mutilations, consideration is given to prohibiting import of cats displaying mutilations such as de-clawing.

Ferrets

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

55. We agree with this proposal.

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

56. In addition to proposed restrictions on pet travel to improve animal welfare, the UK governments should also take this opportunity to amend pet travel regulations to better safeguard the health of the UK's animals, and wider public health.
57. Reintroducing compulsory tick treatments for all commercial and non-commercial movements of cats and dogs
Tick treatments for cats and dogs are no longer required for commercial and non-commercial movements of cats and dogs into GB, however we strongly advise that prophylactic tick treatment is given before travel. We are concerned that the removal of the requirement for tick treatments under the previous EU Pet Travel Scheme has increased the risk of UK exposure to tick species not native to the UK and the potentially zoonotic vector-borne disease they can may carry. This has been demonstrated by canine babesiosis cases in Essex in 2016, including one report of an autochthonous case.⁶ In addition, the vector-borne diseases ehrlichiosis and babesiosis are zoonotic and so present a risk to public health as well as posing a significant welfare impact on an immunologically naïve population of animals. To address the risk of exposure to non-native tick species and potentially zoonotic vector borne disease, the GB governments should reintroduce tick treatments for all commercial and non-commercial movements of cats and dogs.
58. Introducing tapeworm treatment for cats as well as dogs and shortening the tapeworm treatment window
At present only dogs entering GB must be treated for tapeworms by a vet no less than 24 hours and no more than 120 hours (between 1 and 5 days) before its arrival in the UK (unless arriving directly from *Echinococcus multilocularis* free EU Member States – currently Malta, Ireland and Finland). The UK is currently not infected with the tapeworm *Echinococcus multilocularis* (EM). However, although the tapeworm *Echinococcus multilocularis* (EM) is relatively benign in dogs, cats and ferrets, the resulting disease in humans – *alveolar echinococcosis* – is an invasive, cancer-like cystic state of the parasite and can be fatal if not treated. GB governments should therefore introduce tapeworm treatment for cats as well as dogs. Consideration should also be given to reintroducing tapeworm treatments for ferrets as per previous requirements under the Pet Travel Scheme.⁷ In addition, we also support the EFSA recommendation that consideration should be given to shortening the tapeworm treatment window from 24-120 to 24-48 hours before entry into the UK from countries infected with EM, to reduce the risk of re-infection in the UK and keep the UK's *Echinococcus multilocularis* (EM)-free status.⁸
59. Extending the waiting time post-rabies vaccination to 12 weeks
We also support extending the waiting time post-rabies vaccination to 12 weeks (at present the wait time stands at 21 days). Extending the wait time within current pet travel legislation would cover the potential 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 route⁹ and the likely negative welfare experienced by the breeding bitches supplying these puppies.

⁶ Johnson, N. , 2016. Tracing disease emergence: canine babesiosis in the UK. *Vet Rec.* 179: 356-357 doi: 10.1136/vr.i5372

⁷ Ibid.

⁸ 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]

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

60. Defra made changes to the post-rabies vaccination waiting time based on a scientific risk assessment that concluded that the risk of incursion would be very low.¹⁰ However we would question how appropriate a 21 day period is.¹¹ In addition, we believe these changes did not take into account the scale of the illegal importation of puppies and how the Pet Travel Scheme could then be abused to illegally import large numbers of puppies below 15 weeks of age without regard for their welfare needs and in poor health and transport conditions¹². Further, if the wait time were to be extended to 12 weeks post-first vaccination, at 12 weeks the puppy would be a minimum of 24 weeks of age at the point of entry, and dentition checks would be more feasible to use as an option to check age.
61. In addition, extending the post-rabies vaccination wait time to 12 weeks would reduce the disease risk from rabies and other diseases posed by puppies of unknown origin and further reduce the very low risk of rabies incursion of legal imports by aligning the post-vaccination wait time with the average incubation period for the disease.¹³ At present, the 21 day wait time is to allow the vaccine to stimulate the dog's immune system, as opposed to bearing relation to the incubation of the rabies disease itself. Evidence identifies that the average rabies incubation period in individual dogs ranges between 9-69 days, indicating that a 12 week wait time post-vaccination would be more effective in terms of reducing disease risk.^{14,15,16,17,18} Not least, the introduction of a 12 week wait time would align with the current wait period for dogs coming into the UK from unlisted third countries of 12 weeks.
62. Addressing the movement of adult stray dogs for rehoming in the UK
We are seriously concerned about the biosecurity risk posed by the movement of adult stray dogs into the UK for rehoming that have an unknown health history. Under current pet travel regulations, stray dogs can be moved to the UK as long as they are compliant with existing pet travel regulations, including receiving the rabies vaccination and completing the 21-day wait period. However, a stray dog with an unknown history may be moved into the UK whilst it is still incubating a disease, including rabies, as there is no longer the requirement for the titre test before travel.
63. In addition, dogs that are non-compliant with pet travel regulations are quarantined until they are compliant. Therefore, an unvaccinated dog could be vaccinated, quarantined for three weeks and then allowed to enter the UK whilst incubating a disease upon which a vaccination would have little to no effect^{19,20}. These diseases may not be detected in non-clinically affected dogs and are difficult to eliminate from the carrier animal. This puts the UK at a higher disease risk from rabies and diseases which are not endemic in the UK and potentially zoonotic eg. brucellosis, babesiosis, ehrlichiosis and leishmaniasis.

[smuggling/ps-media](#)

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

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

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

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

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

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

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

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

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

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

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

¹⁹ 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.

²⁰ Day, M, 2010. *Veterinary Immunology: Principles and Practice*, Second edition

64. It is also important to recognise that non-commercial movement rules specify that dogs who are moved for the sole purpose of a change of ownership must be transported under commercial movement rules, and those people/organisations 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.
65. We therefore question whether it is appropriate to be moving stray dogs with unknown health status 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.
66. APHA has recognised that cases of *Brucella canis* appear to be rising due to increasing numbers of untested imported dogs, some of which are infected, and the first identified cases of within-UK transmission of this disease have now occurred.²¹ *B. canis* also presents a zoonotic risk with diagnostic laboratories now having in place safety measures to minimise risk to staff.^{22, 23}
67. The Human Animal Infection and Risk Surveillance (HAIRS) Group [Risk review and statement on the risk *Brucella canis* presents to the UK human population](#) sets out that:
- “As of February 2021, more than 40 canine cases of brucellosis (confirmed and probable based on laboratory, clinical and epidemiological investigations), including one large household cluster in England with evidence of dog-to-dog transmission, have been reported in the UK. Apart from the household cluster, for which the source of infection is still under investigation, the remainder are believed to have acquired their *B. canis* infection outside of the UK. These imported cases have all been diagnosed in dogs adopted by UK owners from organisations specialising in rehoming dogs from overseas, the vast majority are in young dogs imported from Romania. The young age range in canine cases reported to date may not be a consequence of clinical disease being more explicit in younger dogs but could be due to a large influx of younger dogs in recent months or years. A review of domestic dog commercial import data by Defra found that to end of November 2020, commercial imports of dogs from Romania had increased in 2020 by 51% compared to 2019 imports with 29,348 dogs brought into the country by commercial means by the end of November 2020.”*
68. Therefore, to reduce the very real risk of importation of disease endemic in other countries, GB governments 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.
 - restrict the movement of stray dogs from countries that have endemic diseases not currently considered endemic in the UK e.g. brucellosis, babesiosis, ehrlichiosis, dirofilariasis and leishmaniasis, and introduce testing for any such diseases as a mandatory requirement for stray dogs before travel to the UK.
 - maintain a comprehensive record of all port checks and diagnostic results from dogs, cats and ferrets to feed into UK surveillance data on the diseases screened for as part of non-commercial movement requirements, and those not considered as endemic for the UK e.g. brucellosis, babesiosis, ehrlichiosis, dirofilariasis and leishmaniasis.
 - work to better enforce non-commercial movement regulations to prevent the movement of dogs for the sole purpose of a change of ownership through non-commercial routes.
 - encourage prospective owners to rehome from the existing UK dog population, including from UK rehoming charities and welfare organisations.

²¹ <http://apha.defra.gov.uk/documents/surveillance/diseases/Canine-Brucellosis-Summary-Final-260421.pdf>

²² Ibid.

²³ https://wwwnc.cdc.gov/eid/article/27/9/20-4701_article