BVA Non-traditional companion animal working group (NTCAWG)  
Meeting 3 – Online sales, regulation of rehoming activities and adequacy of the DWA

Tuesday 30 November 2021  
Zoom

Attendees  
Sean Wensley - Chair  
Justine Shotton – BVA Officer  
Daniella Dos Santos – BVA past president  
John Chitty – BSAVA  
Craig Tessyman - BVNA  
William Wildgoose - FVS  
Romain Pizzi - BVZS  
Alice Moore – Policy Committee representative  
Matt Leach - EWAP representative  
Liz Mullineaux – BVZS  
Benjamin Kennedy - BVZS

Guests  
Jon Cracknell – BVZS  
Keith Hinde – Tech4Pets

BVA  
Hayley Atkin – Policy Officer  
Amelia Findon – Head of Policy and Governance

Welcome and introduction  
1) S. Wensley welcomed attendees to the third meeting of NTCAWG to discuss online sales, regulation of rehoming activities and adequacy of the DWA.

Minutes from previous meeting  
2) The minutes from the previous meeting held on 28 September 2021 were accepted as an accurate record.

Themes  
3) Attendees were content that the draft themes document accurately captured the thinking of the group to date. It was noted that BVA Council members would be updated at their meeting on 15 December and directed to the themes document on the dedicated BVA webpage.

Regulation of rehoming activities  
4) Attendees were invited to identify the principles that should underpin the regulation of rehoming activities involving NTCAs. It was agreed that the proposed list of current issues associated with the rehoming of NTCAs was comprehensive, but not unique to NTCAs. In discussion the following points were made:

- Although issues associated with the rehoming of dogs and cats were outside the scope of the working group the same principles should apply. Different standards for different species would not be appropriate and risked alienating some groups. It was agreed that an introductory paragraph in the final position should acknowledge the cross-species nature of some of the recommendations whilst being clear on the scope of the policy.
- In many respects rehoming centres were pet shops by another name and as such should not bypass appropriate regulation.
- Although anecdotally it was more likely that NTCAs may need to be euthanised by rehoming centres due to the lack of suitable homes available, euthanasia was not a welfare issue per se. This was also true for dogs and cats. The profession
should demonstrate leadership on this principle, notwithstanding the challenges presented by rehoming centres with ‘no kill’ policies.

- Rehoming guidelines existed under ASPA and could be a useful reference point.
- Provisions in Scotland for the licensing of premises operating as rehoming centres could represent a useful model and had set a helpful precedent. It would be useful to monitor the effectiveness of their implementation going forward.
- Definitions were important. Loopholes created by the grey area between ‘rehoming centre’ and ‘sanctuary’ must be avoided.
- The rehoming of animals by educational establishments should also be regulated.
- All vendors of animals should be modelling the highest standards, or standards higher than the baseline, in order to educate potential owners and promote good welfare. Modelling the minimum acceptable standard ran the risk that owners would adopt standards below the baseline.
- There were already issues with ‘temporary’ standards for vending, which had created loopholes and led to some species being housed in sub-optimal conditions (eg snakes).
- Vendors should not be selling sub-optimal equipment (eg cages).
- Standards should be set by an independent group and based on evidence rather than pressure from industry.
- The position should call for a set of baseline standards across all vendors, including rehoming centres.
- It was important to be mindful of any unintended consequences for rescues. Including timeframes for any temporary measures could be helpful, however, it was important not to replicate the issue created for snakes as already discussed.
- Standards must be evidence-based. Arbitrary requirements were an unhelpful distraction from real welfare provision.

5) It was agreed that the position should call for UK-wide regulation across all pet vendors, with clear definitions and a consistent approach such that rehoming centres/rescues/sanctuaries were required to meet baseline standards. Standards should be evidence-based (recognising the hierarchy of evidence), developed by an independent body, and adequately enforced. It was agreed that the approach in Scotland could be cited as a model, subject to monitoring impact as guidance bedded in.

Online sales

6) Attendees were reminded of the agreed underpinning principle in relation to online sales: 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).

7) PAAG had minimum standards for classified sites to sign up to, including providing welfare information, and agreeing not to advertise certain species if their needs were too complex for general ownership. However, the limitation of these standards was that they were voluntary. PAAG had its own exotics subgroup which had been advising sites of NTCA specific issues. Members were reminded that on Glasscubes the working group had agreed to support the following asks for improved regulation of online sales, including:

- PAAG Minimum Standards represent a good starting point for websites looking to adhere to good animal welfare practice and should be used by Government as a basis for regulation of the sector.
- All forms of advertising, including online, should be verifiable.
- Any person selling an animal should have to register to do so with their Local Authority. Registration should extend to the breeding, sale or dealing in all pets – not just puppies.
Sellers should display the registration number as part of all forms of advertising including online.

A centralised, publicly accessible list of registered and licensed sellers of pets should be kept or facilitated by Defra and the devolved governments to enable websites and buyers to check the legitimacy of the seller.

In conjunction with this, websites should require all sellers to fill out a mandatory field where they must enter their licence or registration number, so that potential buyers could verify them independently. It should be stated clearly next to this number that licensing or registration does not in any way indicate that any form of inspection has taken place or that the seller is being endorsed in any way.

8) Attendees received a presentation from Keith Hinde from Tech4Pets, an initiative which used technology and Open-Source Intelligence techniques to monitor online pet sales and dismantle pet trafficking networks through the analysis of data. In discussion the following points were made:

- Although the dark web was also a source for the illicit pet trade (particularly breeder/breeder, wild caught, and endangered CITES), the average consumer would utilise authenticated web addresses. Google and Facebook were the usual points of entry. The Tech4Pets approach could equally be applied to the dark web if so desired.
- The data sets produced were helpful for horizon-scanning but could also be used reactively to sting a particular activity or look at trends (e.g., prices, or reasons given for abandonment). The approach could be applied at a macro or micro level, with text or photo analysis.
- HMRC should be cracking down on the illicit pet trade, and had shown an interest in the data sets.
- PAAG fulfilled an important function in that it encouraged sites to compete with each other on offering better welfare as a USP. This then helped to corral those trading on lower welfare into a place where they could be monitored.
- Effective enforcement was critical. Pets4Homes was one of the most proactive sites on welfare assurance, but enforcement was inconsistent.
- The position should welcome the initiative and recognise such data as an important asset.
- It was agreed that there should be regulation of online adverts via third party sites. Regulating buyers and sellers was impossible to enforce whereas regulating adverts presented a more realistic prospect of change.
- There was a delicate balance needed between tackling those trading on lower welfare without turning off those sellers and buyers for whom welfare was important.
- Paradoxically, if sellers were pushed off a particular site as a result of raised standards their move to a different site would push that site up the search rankings and raise its profile.
- The psychology of pet purchasing was potentially an important consideration. It was unclear to what extent purchasers of NTCAs were collecting the unusual, and how this compared to the motivation of those purchasing dogs and cats.
- PAAG were currently grappling with identifying the most effective disruptors for online adverts. It was noted that Tech4Pets could help assess effectiveness of disruptors by monitoring data shifts when interventions were trialled.

9) It was agreed that the position should support the work of PAAG and highlight the role of data collection and monitoring, as well as disruptors as the key to improving animal welfare beyond legislative approaches.
Dangerous Wild Animals Act

10) Attendees were reminded that the Dangerous Wild Animals Act (DWAA) had been introduced in the seventies to regulate the keeping of dangerous animals to protect public safety. Anybody intending to keep an animal listed in the Act required a licence from the local authority.

11) Attendees received a presentation from Jon Cracknell on DWAA, highlighting a number of issues including: absence of a central register of licenses, issuing of retrospective licenses, lack of escape management requirements, no clear determinants of 'suitable person', inconsistent definition of 'dangerous'. In discussion the following points were made:

- The Animal Welfare Act(s) protected the animal welfare element absent from the DWAA. Cross referencing could be a solution.
- The DWAA, applied in conjunction with other legislation, could be considered adequate, however enforcement was a significant gap.
- Zoo licensing and the DWAA could reasonably be combined.
- Welfare was welfare and should be applied consistently regardless of the status of the collection.
- Many DWA license holders were very good and provided conditions which were better than those in zoos.
- Becoming a zoo was currently a workaround to the introduction of positive lists.
- Regarding inspection, there was some benefit in outcome guidelines rather than specific requirements. This allowed some flexibility and the application of professional judgement on the part of the inspecting vet.
- Rigid requirements on elements such as size of enclosure inevitably meant that some keepers would only aim to meet baseline standards.
- If inspections were based on outcome guidelines rather than against specific requirements, then training of inspectors would need to be extremely thorough and species specific. It could also be more difficult to take enforcement action where guidance was open to interpretation.
- A prescriptive approach might better serve existing veterinary capacity issues and mitigate against inconsistency of approach.
- The Dangerous Wild Animals (Northern Ireland) Order 2004 aimed to combine public safety and animal welfare and was therefore a potentially useful model.
- It was agreed that a minimum standard was needed. Standards should be supported by updated inspection templates.
- Standards should match zoos from a safety/containment perspective.
- Provision for behavioural needs should also be included.
- Inspection should be carried out by a vet, with the appropriate additional training rather than an ‘authorised person’.
- It was important to differentiate between minimum standards for safety and minimum standards for welfare.
- Veterinary capacity to complete appropriate training and carry out inspections was a consideration. Prescriptive requirements enabled vets to inspect, and local authorities to enforce.
- The costs associated with training vets to inspect would increase costs for the applicant. This could be a positive as it would deter more casual applications.
- The approach to firearms licensing could provide a model for defining ‘suitable person’, although this did not currently include assessment of the mental health of an applicant.
- Local authorities did not generally want to seize animals.
• Euthanasia of the animal(s) should be seen as an appropriate solution to non-conformance from a keeper.
• Standards for invertebrates were needed.

12) It was agreed that a set of minimum standards, mirroring those required for zoos, must be met by license applicants/holders. The standards should include safety and animal welfare, including behavioural needs, and must be inspected against and enforced. Vets should be supported to inspect with clear guidance/templates.

13) Further consideration was needed as to whether Category 1 and Category 2 hazardous animals as listed for the purposes of zoo licensing could reasonably replace the current DWAA list. If so, consideration should also be given as to whether Category 2 inspections could be carried out by non-vets who were appropriately trained.

Date of next meeting
14) The next meeting would be held Monday 13 December 10-am-1pm by Zoom.