BVA Non-traditional companion animal working group (NTCAWG)
Meeting 5 – Sustainability (international trade and wild capture)

Thursday 20 January 2022, 11.00-15.00

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

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

Apologies
Jon Cracknell - BVZS

Welcome and introduction
1. S. Wensley welcomed attendees to the fifth meeting of NTCAWG to consider BVZS feedback on draft recommendations, international trade and wild capture.

Minutes from previous meeting
2. The minutes from the previous meeting held on 13 December 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 agreed that a glossary of terms should be added to the themes document and final position.

Action: BVA Secretariat to add glossary to themes document and final position

BVZS feedback
4. R. Pizzi and L. Mullineaux outlined the key feedback and concerns raised by BVZS members regarding the working group’s draft recommendations. Attendees then considered each feedback theme in turn. See feedback and agreed next steps set out in table at Annex A.

5. It was agreed that S. Wensley would attend a virtual meeting with BVZS Council to clearly set out the working group’s thinking and process to date, as well as the response to BVZS feedback.

Action: S. Wensley to attend BVZS Council meeting and report back at next NTCA meeting

International trade in NTCAs
6. Attendees were reminded of the agreed underpinning principles in relation to international trade in NTCAs:
   • Measures should be taken to improve the welfare of NTCAs during transport
   • 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

7. Attendees were asked to identify the current issues surrounding NTCA welfare during commercial transport and agree any potential recommendations for improvement. In discussion the following points were raised:
There should be clearly defined transport standards for NTCAs (including invertebrates) across all methods of transport, and movements (ie. for commercial and non-commercial movements). This should include temperature ranges, size of containers, rest periods, access to feed and water or feed withdrawal periods, acceptable mortality levels and training of transporters (similar to standards set out in legislation at present for livestock).

There was a lack of clarity as to what ‘transport’ meant, ie. did it include time in holding centres and rest points. The working group agreed that welfare standards should apply at each stage of an animal’s journey, including time spent in holding centres or rest points.

It was noted that IATA Live Animals Regulations was the worldwide standard for transporting live animals by commercial airlines. However, it was recognised that these could be improved upon and only applied to air travel.

It was noted that fish are largely transported in complete environments and packed according to OATA regulations. OATA have their own transport code of conduct which members must adhere to.

There is a commercial driver to ensure welfare standards as exporters want to ensure that their product arrives at the destination alive and in good condition so as to ensure a successful sale.

There was, or should be, a shared responsibility between exporter and importer for ensuring good welfare during transport.

Recognising that movements will have an impact on NTCA welfare, it may be beneficial to direct prospective owners towards UK-based responsible breeders (eg. assured breeder scheme for NTCAs captive-bred in the UK), or to develop a transport kitemark which would provide assurances that welfare standards have been met throughout the journey.

There were also potential issues with transport within the UK (eg. sending NTCAs via courier). Although Royal Mail did not permit fish, it was unclear to what extent this was checked.

At present, to export blood samples from CITES species for diagnostic testing a licence and additional paperwork are required, which adds a barrier to accessing the required tests.

8. Following the discussion, the group agreed that there were three key themes that would be useful to unpick further at the next meeting: welfare standards (what good would look like); enforcement of these standards; and responsible procurement. It was agreed that the working group should invite a representative from the Heathrow Animal Reception Centre to provide an insight into existing welfare standards in transport for NTCAs, and how current legislation is implemented.

Action: BVA Secretariat to invite representative from Heathrow Animal Reception Centre to present at next meeting.

Wild-caught NTCAs

9. Attendees were reminded of the agreed underpinning principles in relation to the wild-capture of NTCAs and BVA’s existing position:

- 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 whether there is sufficient evidence to prohibit the import of certain wild-caught species to the UK.

- BVA, BSAVA, BVZS and FVS currently support a ban on the import of wild-caught reptiles and amphibians to be kept as pets, except for defined and legitimate conservation reasons. NB with support of FVS, the statement deliberately does not refer to fish as it was agreed that there are considerations relating to the keeping of fish as companion animals which are separate from those relating to other non-traditional companion animals.

10. Members were then invited to consider the positive and negative impacts of wild-capture, as well as agree whether BVA should continue to call for a ban on the import of wild-caught reptiles and amphibians, or whether this should be extended to any other species.
11. It was agreed that for the purposes of the BVA position statement, wild-capture should be defined as the capture of animals for the pet trade that are free-living in their wild environment at the point of capture.

12. **Positive impacts of wild-capture**
   In discussion the following positive impacts of wild capture were identified:
   - Wild capture can play a role in sustaining local economies and provide important benefits to the communities in the country of origin. This is particularly pertinent in the case of wild caught fish. The OATA *Wild caught ornamental fish: The trade, the benefits, the facts report* highlights benefits of the wild capture fish industry.
   - It provides vital livelihoods for tens of thousands of fishermen and communities in remote areas that have fewer employment opportunities.

13. Ultimately it was noted that these positive impacts are largely socio-economic and form part of a wider conversation around international development. However, it was agreed that as an animal-welfare focused profession, the working group’s recommendations around wild-capture should be primarily informed by animal welfare considerations.

14. **Negative impacts of wild-capture**
   In discussion, the following negative impacts of wild capture were identified:
   - There is a general lack of traceability and on the ground data to verify welfare standards at point of capture, transport and habituation to new captive environment.
   - Negative impact on bio-diversity.
   - Negative impact on species numbers and threat of extinction.
   - Risk of emergence and transmission of zoonotic diseases.
   - Negative impacts on animal welfare linked to capture and transport.
   - Negative impact on animal welfare if there is a failure to adapt to a captive environment.
   - Risk of non-native species release in destination countries, this could lead to transmission of pathogens, disruption of ecosystems, and predation/competition with native species.
   - It was noted that caution should be exercised when citing numbers of species that enter into the international trade as volume of species is not indicative of welfare issues.

15. **BVA position**
   Following this discussion, it was agreed that BVA should extend its existing position to call for a ban on the import of all wild-caught animals for non-conservation reasons, including fish.

16. While the socio-economic benefits of the wild-caught fish trade were recognised, it was felt that from a welfare perspective it was difficult to justify the omission of fish from a ban, particularly given progress in recent years in fish welfare, and BVA’s lobbying for equal protections for fish in welfare legislation eg. welfare at slaughter legislation.

17. It was agreed that it would be important for the working group to clearly explain their rationale for this in the final position statement. The working group should explicitly state that their recommendations had been primarily informed by animal welfare considerations, which, for the veterinary profession, were not outweighed by potential social benefits.

18. It was also agreed that it would be beneficial to highlight the role of responsible procurement and encourage prospective owners to consider the provenance of NTCAs eg. by encouraging industry to establish an assured breeder scheme for NTCAs captive-bred in the UK.

**Action:** BVA Ethics and Welfare Panel and FVS to consider draft recommendation on wild-capture and provide feedback.
AOB
19. J. Chitty raised that BSAVA Council had concerns regarding hybrid cats and it would be useful to discuss this in more detail at the next meeting.

Date of next meeting
20. The next meeting would be held Tuesday 1 March 11.00-15.00 by Zoom.
## Annex A: BVZS feedback, working group response and agreed next steps

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<tr>
<th>BVZS Feedback</th>
<th>Working group response and next steps</th>
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<td>Most of the underpinning principles apply to all species, including traditional companion animals (e.g., dogs and cats) and ‘traditional’ non-traditional companion animals (e.g., tortoises)</td>
<td>Members had highlighted this point in previous meetings and agreed it was important to recognise it in the final BVA position. Working group to include statement in final position to recognise that many of the group’s underpinning principles can apply to all species.</td>
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<td>NTCAs 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, where that is lacking, practical knowledge and experience.</td>
<td>Members were happy to accept the amendment to the principle, and recognised that it was also important to qualify the statement by mentioning that any assessment of published evidence should make use of the hierarchy of evidence. Working group to amend overarching principle to read: “NTCAs 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 (making use of the hierarchy of evidence) and, where that is lacking, practical knowledge and experience.”</td>
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<td>Effective enforcement and implementation of existing animal welfare legislation (AWA, AALs) and improved education of stakeholders is a crucial element if we are to improve the welfare of NTCAs and other domestic species. Better guidance (e.g., Codes of Practice for keeping each species) should underpin all legislation.</td>
<td>Members had highlighted this point in previous meetings and agreed it was important to recognise it in the final BVA position. Working group to include reference to enforcement and implementation of existing legislation, as well as the importance of improved education and Codes of Practice in final position.</td>
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<td>Some species do have husbandry requirements that are more difficult to meet and that are not suited to every keeper (e.g., some psittacine birds)</td>
<td>Members had highlighted this point in previous meetings and agreed it was important to recognise it in the final BVA position. Working group to include reference to this in final position.</td>
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<td>Some keepers are much more able to provide for NTCAs’ welfare needs than others</td>
<td>Members had highlighted this point in previous meetings and agreed it was important to recognise it in the final BVA position. Working group to include reference to this in final position.</td>
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| **Point of sale advice is still inadequate in many cases** | Members had highlighted this point in previous meetings and agreed it was important to recognise in the final BVA position.  

**Outcome:** Working group to include reference to this in final position |
|---|---|
| Keepers should register NTCAs with a veterinary practice able to provide for their needs; ideally one with staff experienced and/or qualified in dealing with these species | Members agreed with this point and felt it would be important to highlight in the final position. It was also raised that given the current pressures facing the profession and a lack of confidence in treating NTCAs routinely for some practices, it would be useful to advise owners to check their local practice is able to provide routine care for their pet before acquiring one.  

**Outcome:** Working group to include reference to registering with a vet in the final position and highlight the importance of checking that local practices will be able to provide routine care for NTCAs before acquisition. |
| There are real and genuine concerns from a conservation, disease and welfare viewpoint of the international trade in wild caught animals | Members had highlighted this point in previous meetings and would be discussing further in the meeting later today.  

**Outcome:** Working group to include reference to this and conclusions from further discussions in final position. |
| Internet sales, these should be regulated and the principles set out by the PAAG should be followed. | Members had highlighted this point in previous meetings and agreed it was important to recognise in the final BVA position. It would also be useful to highlight in the position that this recommendation should apply across species, not solely NTCAs.  

**Outcome:** Working group to include reference to this (and its application across species) in final position |
| It would be beneficial to cite evidence from sources other than campaign groups eg. RSPCA and Born Free. | Members recognised BVZS concerns and emphasised that references currently cited in the ‘Themes doc’ will be expanded on in the final position, making sure to reference primary sources where they are available. BVZS members are encouraged to submit any additional evidence and references to BVA secretariat for inclusion in the final document. It was agreed that it was appropriate for BVA to reference sources produced by NGOs and campaign groups, in principle, particularly where they are providing factual information or have produced useful figures eg. collating tables of legislation. It may be useful to give an indication of the type of evidence being cited within the final position in the references eg. scientific literature, report produced by an NGO or industry, to ensure full transparency to the reader. |
Some BVZS members disagree with using the term ‘non-traditional companion animal’, as some of these species have been kept ‘traditionally’ for decades and the term ‘exotics’ or ‘exotic pet’ is largely used by veterinary services in public-facing communication materials.

Members recognised these concerns, however felt that as long as the final position included a definition of the terminology and recognition that other terminology may be used for different audiences (eg. public-facing communications), the use of NTCA was appropriate.

Outcome: Working group to continue to use the term NTCA with a clear definition. The final position will recognise that the term ‘exotics’ is sometimes also used in veterinary practices and in communications aimed at the wider public.

It was suggested that the final position document would benefit from a section explaining the limits of the term ‘NTCA’ including the fact that many of these species have been kept ‘traditionally’ for decades and that ‘exotic pet’ is the term used by the public facing profession.

In light of local authority resource constraints, the establishment of a listing system may not confer any additional welfare benefits as it may not be effectively implemented/enforced. In addition, it may have an impact on the rehoming sector if some species are relinquished/abandoned and cannot be legally rehomed.

Working group members considered the feedback on positive lists, the following points were raised in discussion:

- The importance of effective implementation and enforcement of existing legislation (AWA, AAL regulations) and the development of Codes of Practice should be highlighted in the position. However, it was felt that solely calling for the effective enforcement of current legislation given local authority resource constraints would be ineffective. Therefore the working group should apply the precautionary principle and be aspirational in its recommendations by proposing some form of further regulation of ownership of NTCAs.
- In light of current local authority resource constraints which may impact effective enforcement of legislation, a positive list/traffic light system may enable some element of self-regulation by prospective keepers if certain species were clearly not permitted to be kept or sold.
- Impacts on the rehoming sector were considered; it was felt that humane euthanasia was an acceptable option in circumstances where there was insufficient rehoming capacity, an inability to rehome or as an alternative to long-term keeping in inappropriate conditions which could cause suffering.
- Education did have an important role to play in improving NTCA welfare, but it was not sufficient to rely on this alone.
- It was recognised that by introducing additional regulation, there may be concerns that this would create barriers between vets and the public. It would be important to reiterate that vets would never refuse to see an animal in need, referring back to their RCVS oath, and the fact that they would not be expected...
to police new legislation. There is already precedent for this eg. vets seeing illegal imports, or breeds banned under the Dangerous Dogs Act.

- The concern that a positive list would be unlikely to improve the welfare of starter species and would perpetuate the misconception that these species are easy to keep was recognised. It was felt that this could be addressed by ensuring that the five welfare needs/domains were placed at the centre of any species assessment system that underpinned future regulation. In addition, keepers should be required to pass a pre-purchase knowledge test to demonstrate they have the expertise to provide a Good Life for these animals. This test should be developed with input from the veterinary profession and industry.

- It was felt it was appropriate to reference Toland et al. (2020) Turning Negatives into Positives for Pet Trading and Keeping: A Review of Positive Lists as the paper had been peer-reviewed, and was also balanced. For example, when discussing positive list criteria the authors state that: “Exemptions could apply for specialists to keep prohibited species. Such prospective keepers should be required to demonstrate that animals are kept as part of a scientifically managed conservation programme, or that they have a standard of expertise, appropriate facilities, and husbandry regimes to meet a high bar threshold.”

- Rather than suggesting one specific species assessment system the working group should present a range of options that policy makers could use including aspects from Schuppli, Fraser and Bacon, Toland et al. and EMODE.

- As feedback highlighted, the final position should not overstate the final conclusion of the SAWC interim report on exotics.

- Despite the difference in terminology, a positive list and licensing system, traffic light system, and multi-tier licensing system seek to achieve very similar outcomes eg. a list of permitted species (green), a licensing system for individuals who can demonstrate that they can meet the welfare needs of certain species (amber), species that are not permitted (red).

Outcome: Working group to continue to call for new regulation, focusing on the outcomes that should be achieved as opposed to suggesting specific terminology. For example, outlining desired outcomes and explaining that this could be achieved through a traffic light system, multi-tier licensing or a positive list and licensing system.