BVA Non-traditional companion animal working group (NTCAWG)
Meeting 6 – Mop up

Tuesday 1 March 2022 11am

Attendees
Sean Wensley - Chair
Daniella Dos Santos – BVA past president
John Chitty – BSAVA
Craig Tessyman - BVNA
William Wildgoose - FVS
Alice Moore – Policy Committee
Romain Pizzi – BVZS
Matt Leach – EWAP
Sian Richards (guest) – Heathrow ARC

BVA
Amelia Findon – Head of Policy and Governance
Charlotte Austen-Hardy – Media Officer

Apologies
Justine Shotton – BVA Officer
Liz Mullineaux – BVZS

Minutes from previous meeting
1. The minutes from the meeting held 20 January 2022 were accepted as an accurate record. It was noted that fish were transported according to IATA regulations rather than OATA, and it was agreed this would also be corrected in the themes document. It was also noted that Royal Mail did not permit live fish.

BVZS update
2. At the January meeting of the group a number of concerns from BVZS members had been discussed, in particular the matter of terminology (NTCAs v. exotic pets) and the move towards a call for positive lists. S Wensley had subsequently attended a BVZS Council meeting where it had been agreed that in order to ensure the welfare of NTCAs, some sort of categorisation of species was required. Although the terminology (ie positive list, negative list, traffic light system) was divisive, there was common ground in terms of the desired outcomes and there was broad support amongst BVZS Council for a traffic light system as the regulatory framework. It had also been agreed that the term NTCA could be accepted providing there was a clear explanation that the term ‘exotic pet’ was often used interchangeably for public-facing communications.

3. R Pizzi reported that it had been helpful for BVZS Council members to understand the context and thinking of the working group. Concerns relating to some of the references used in the themes document had also been addressed, with an agreement that secondary quoting should generally be avoided, and original sources would normally be cited.

4. It was noted that the BVA Ethics and Welfare Advisory Panel (EWAP) had agreed at their recent meeting that it was appropriate to focus on desired outcomes over and above semantics when it came to the potential regulatory framework for NTCAs.

FVS update
5. Feedback from FVS members had been circulated on Glasscubes, and of 14 respondents, 10 were not in favour of supporting a ban on wild-caught fish. In discussion the following points were made:
   - It was clear that some FVS members were defending a commercial position.
   - Length of life was not the same as quality of life/life worth living. Equating the two was unhelpful.
Fish were sentient and therefore there was no justification for making an exception for wild caught fish.

Zebra fish in laboratory settings were very well protected in legislation.

The view from EWAP that conservation should occur for its own merits rather than as a consequence of wild capture was supported. The justification for wild capture should be recognised but not supported.

An alternative to wild capture should be the focus, rather than improvements to the status quo. A ban on wild caught fish should be phased in, supported by the responsible captive breeding of popular species.

6. It was agreed that an exemption for wild caught fish represented a slippery slope, and defending commercial interests was not appropriate. The societal benefit of wild capture was acknowledged but not supported as a reason to continue wild capture, and there should be a move towards a ban. It would remain important to engage with rather than alienate the ornamental fish sector.

Themes
7. Some minor updates to the themes document were noted:
   - If calling for welfare of invertebrates to be included as part of licensing conditions under the DWA it would be important to decide which taxonomic groups and whether evidence of sentience could be the guide.
   - It could be problematic to require licensed animals to be registered with Advanced Practitioners. Appropriately experienced/competent vets should also be included.
   - The American College of Zoological medicine offered post-graduate qualifications which did not require residency. Although routes to specialisation were limited it was important to note the options.

International trade in NTCAs
8. Attendees were reminded of the previously 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

9. At the last meeting it had been agreed that:
   - All commercial importers of captive-bred NTCAs should be licensed and required to meet minimum welfare standards during transport.
   - 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)
   - Welfare standards should apply at each stage of an animal’s journey, including time spent in holding centres or rest points.
   - There should be a shared responsibility between exporter and importer for ensuring good welfare during transport.
Industry should be encouraged to develop a transport kitemark which would provide assurances that welfare standards have been met throughout the journey.

10. Sian Richards, deputy manager at the Heathrow Animal Reception Centre was welcomed to the meeting to present on current standards and challenges of enforcement. It was noted that:
- 2021 had seen a 33% increase in cats and dogs coming via HARC, as well as 25 million fish, 10 million aquatic invertebrates (including crustaceans, molluscs, and coral), 77k reptiles, and 104k amphibians.
- The HARC team was responsible for checking compliance with IATA regulations, including container type and stocking density.
- Checks on wild caught shipments would be subject to particular scrutiny.
- Non-compliance could lead to prosecution of the carrier, or reports to APHA/CITES team.
- Fish were generally well provided for during transport. Most issues were seen in reptiles.
- Inspection was carried out on a risk basis with those carriers known to have a consistently good track record less likely to be selected. The minimum inspection rate was 10%
- Smuggling was rare. Chameleons tended to be the species most likely to be smuggled, and mortality rates in chameleons were high.
- Venomous snakes were sometimes used as a cover for smuggling of other goods and were therefore subject to additional scrutiny. Wildlife crime was often a cover for other illicit activity (eg cocaine dissolved in water concealed in shipments of fish)
- Delays and seizures were often connected to poor understanding of import requirements, missed declarations, spelling mistakes on paperwork, and lack of documentation in the case of pets being imported by owners. In birds, pre-import swabs for AI were often inadequate with cloacal swabs missed entirely.
- Pre-notification and pre-checking of containers and paperwork would help reduce issues, delays, and the welfare problems associated with seizure of freight.
- Mishandling off the aircraft was also a potential welfare issue. The HARC had facilities for re-bagging and reoxygenating fish, as well as access to tropical water if needed.
- If IATA regulations were followed to the letter, then broadly speaking transport conditions were good. However, journey time, temperature fluctuations in transit, and mishandling were all unquantifiable.
- When freight was seized the importer had 30 days to make a challenge. This meant that animals could be held at the HARC for as long as two months before being moved/rehomed. It was unclear where animals were rehomed, although euthanasia was not known to be a common solution.
- Given the large size of some shipments it was difficult to imagine where the demand was coming from.
- Welfare concerns were also seen in pet birds where lack of paperwork meant they were separated from their owner.

**Action: secretariat to liaise with HARC on mortality data**

11. In discussion it was agreed that:
- Pre-notification and advance checking of paperwork would represent a health and welfare benefit. Border Force and the CITES team had a role to play.
- Carriers should be more thorough on acceptance procedures. Although IATA offered a general qualification and checklist there was a gap for species-specific acceptance training and checks.
Handling agents should be made aware of the need to prioritise live freight over and above other handling targets.

An assurance scheme for suppliers could help foster responsible sourcing by buyers.

**Responsible captive breeding**

12. The working group had previously agreed the overarching principle that captive breeding should be carried out responsibly, sustainably (not using wild-caught animals unless for limited purposes e.g., conservation or genetic diversity) and without negatively impacting on animal health and welfare (e.g., selective breeding for phenotypic variants (morphs), causing genetic disorders).

13. In discussion the following points were made:

- Morphs were extremely complex, and the position could not reasonably explore the detail. However, it was appropriate for the position to urge caution because some morphs came with health issues. It was agreed that reference to enigma and spider morphs would be included.
- Most GP vets would not feel competent to offer pre-purchase advice on morphs. Prospective owners should be encouraged to seek advice from appropriately qualified or experienced exotic vets.
- Breeders should not be knowingly selecting for conformation and traits which caused health and welfare harms.
- Language from the existing BVA position on brachycephalic dogs could be replicated, particularly in relation to outcrossing and avoiding the introduction of new health issues.
- Backcrossing and line breeding sometimes had a role to play in conservation.
- The position must be robust on breeding for poor conformation. It was not sufficient to say that breeders should “carefully consider the health and welfare problems”. The poor conformation seen in cats and dogs should act as a warning of what could occur in NTCAs if breeding for looks instead of welfare was allowed to continue and grow.
- Selective breeding for traits which would not survive through natural selection should be discouraged.
- Curiosity-led breeding based on aesthetics where there was potential for welfare harms could not be supported.

14. The existing BVA position on extreme conformation set out a number of recommendations which could apply to the breeding of NTCAs. In discussion it was agreed that:

- Cross-referencing the position was appropriate.
- First bullet: “traits” should be added alongside extreme conformation.
- Second and third bullets: “carefully consider” should be replaced with stronger wording.
- Third bullet: “vet” should be replaced with “a veterinary professional with suitable qualifications, experience, or competence”.
- Fourth and fifth bullets were supported.

15. It was agreed that the captive breeding of birds, in particular hand-rearing, could lead to welfare harms. Isolation rearing and sensory overload techniques should not be supported. Creche rearing was more acceptable, as was mixed/part parent reared. Hand-rearing could also lead to sexually bonded birds, which led to behavioural issues. The group agreed that whilst there may be some instances where hand-rearing was unavoidable (i.e., death or injury of parent bird), it was extremely difficult to do without creating psychological issues. Caution was urged regarding using conservation as a justification for welfare harms, and it was agreed that legitimate exceptions should not be allowed to create loopholes.
16. The group were also concerned regarding hybrid cats, the risks associated with mating, and the welfare of cervals kept in captivity for the purpose. It was agreed that there was no need to be producing F1 hybrids when there was already a population of hybrid cats. It was noted that even F5 and F6 hybrid cats were highly demanding and complex animals, and it was difficult to meet their welfare needs in a domestic environment.

**Welfare of animals bred for NTCA food**

17. The welfare of animals bred for NTCA food had been identified as a priority animal welfare problem as part of the BVA Animal Welfare Strategy. The matter had been discussed at the recent meeting of the Ethics and Welfare Advisory Panel where, notwithstanding members’ general unease with the keeping of NTCAs at all, it had been agreed that live feeding of vertebrates was unacceptable and likely to be illegal. EWAP had acknowledged that emerging evidence on sentience made it difficult to know where to draw the line on live feeding of invertebrates, and members had agreed that where vertebrates and invertebrates were bred and killed for NTCA food, good husbandry and welfare at slaughter must be ensured.

18. In discussion working group members made the following points:

- Live feeding of vertebrates appeared to be a legal grey area. In theory anyone live feeding a vertebrate to a predator species could be prosecuted under the Animal Welfare Act, however, there was yet to be a test case.
- The provision of a refuge for the prey animal could help circumvent legislation, subject to all other welfare needs also being met.
- Arguing that live feeding was an important part of natural behaviour for the predator animal was a weak argument given that captivity was not a natural environment.
- It was agreed that live feeding of vertebrates could not be supported in any circumstance, and NTCAs which required live feeding of vertebrates should not be kept.
- Understanding of invertebrate sentience was evolving and more difficult to define than for vertebrates.
- Invertebrates represented an enormous order of animals. Insecta and molluscs were the main taxonomic groups used as NTCA food, although blood worms, annelids, and daphnea might also be used for some species, including fish. It was agreed that live feeding of these groups was likely to be acceptable, but only when necessary.
- In all cases the welfare needs of invertebrates should be met prior to feeding.
- There was no commercial rodent breeding in the UK for NTCA food. It would be helpful to understand EU regulation applying to those rodents being bred and killed in the EU and the numbers being imported.
- The lack of choice thwarted responsible procurement.
- Rodents leaving laboratories as waste could provide a partial solution, and there was some read across with the BVA position on surplus male production animals.
- Livestock of any kind, produced for pet food, should have welfare protections.
- The challenges associated with the welfare of animals bred for NTCA food should be acknowledged in the position.
- It could also be helpful to reference BVA lines on vegetarian and vegan pet food and the importance of appropriate nutrition.

**Scope - review**

19. Working group members reviewed the original scoping document setting out the objectives of the group. It was agreed that across the six meetings the group had considered all of the issues identified.

20. It was noted that in relation to euthanasia of NTCAs the AVMA Guidelines on euthanasia
were a useful reference. It was agreed that supporting quick reference factsheets could be a useful resource for vets in practice.

Next steps

21. The minutes and updated themes document would be circulated on Glasscubes as usual. The first draft of the position would then be made available via Glasscubes in the second half of April, with an opportunity to work through several iterations until the working group was happy to sign off the draft. Working group members were encouraged to meet any deadlines for comments if at all possible. The draft position would then progress through EWAP (May) and Policy Committee (June) with a view to recommending the position to Council in July. This timeline was flexible if issues or gaps were identified.

Any other business

22. It was noted that whilst rising fuel costs could impact on keepers of NTCAs the issue was much wider and therefore not a specific consideration for the group.

23. S Wensley thanked working group members for their excellent contributions and collaboration over the course of the six meetings and looked forward to ongoing work via Glasscubes as the draft position developed.