

## BVA Non-traditional companion animal working group: Principles and emerging themes document

This document records the broad principles and draft recommendations emerging from the working group discussions, key points and evidence underpinning each principle. This document will be kept under review and developed as the working group progresses. It is an iterative process that will develop into the final position.

All members are encouraged to feed in thoughts on these principles and emerging themes via [hayleya@bva.co.uk](mailto:hayleya@bva.co.uk)

<b>Definitions</b>	
<b>Non-traditional companion animal</b>	<p><i>For the purposes of this position, the term ‘non-traditional companion animal (NTCA)’ refers to all sentient companion animals<sup>1</sup> that are not traditionally kept in the UK. The term excludes domestic cats, domestic dogs, domesticated equids, rabbits and species that are typically farmed.</i></p> <p><i>We recognise that the term ‘exotics’ and ‘exotic pets’ can also be used to refer to this group of animals and its use largely depends on the context eg. veterinary practices, and communications with the public</i></p>
<b>Companion animal</b>	<p><i>As set out by Callisto, a companion animal can be defined as: “[...] any domesticated, domestic-bred or wild-caught animals, permanently living in a community and kept by people for company, amusement, work (e.g. support for blind or deaf people, police or military dogs) or psychological support including dogs, cats, horses, rabbits, ferrets, guinea pigs, reptiles, birds and ornamental fish.”</i></p>
<p><b><i>Glossary to be added once final position is drafted. Acronyms to be spelled in full upon first use throughout final document.</i></b></p>	
<p><b><i><u>It is important to note that many of the statements made throughout this document are applicable across all companion animal species.</u></i></b></p>	
<b>Welfare requirements and legislative responsibility</b>	
<b>1)</b>	<p><b>Non-traditional companion animals can have exacting husbandry requirements, and complex social, cognitive and nutritional needs.</b></p> <ul style="list-style-type: none"> <li>• Under the UK Animal Welfare Acts all animal keepers and owners must ensure that they can meet the five welfare needs of the animals that they keep, these are: the need for a suitable environment; the need for a suitable diet; the need to be able to exhibit normal behaviour patterns; the need to be housed with, or apart from, other animals; and the need to be protected from pain, suffering, injury and disease.</li> <li>• Effective enforcement and implementation of existing animal welfare legislation and improved education of stakeholders is crucial to ensure a Good Life for NTCAs. To improve the existing legislative framework, consideration should be given to underpinning the UK Animal Welfare Acts with Codes of Practice for taxonomic groups.</li> <li>• Recognise that there are some very knowledgeable keepers in the UK with a breadth of experience and expertise. However, there are some species whose five welfare needs are so specialised they could rarely or never be met in a domestic environment. Give primates as pets position as an example, and some psittacine birds.</li> <li>• 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. Before acquiring an NTCA, prospective owners should check local veterinary provision in the area and make sure that there is a veterinary practice that is able to provide routine care for their pet.</li> </ul>

<sup>1</sup>The Global Animal Law Project states that scientific research confirms that all vertebrates (fish, amphibians, reptiles, birds and mammals) are sentient animals and indicates sentience in some invertebrates. Evidence indicates that cephalopods (e.g. octopus, squid) and decapods (e.g. lobsters, crabs) are sentient, and are capable of experiencing pain and distress. Already the Animals (Scientific Procedures) Act 1986 Amendment Regulations 2012 (administered by the Home Office),<sup>1</sup> includes “any living cephalopod” and animals in their “foetal, larval or embryonic form” within the category of protected animals.

British Veterinary Association | **To have a Good Life**<sup>2,3</sup> all animals, including NTCAs, must have the opportunity to have positive experiences. Over time, positive experiences should outweigh negative experiences. This should encompass the whole of an animal's life.

- To protect, advocate and enhance animal welfare, the welfare of sentient animals, including NTCAs, should be assessed using up-to-date concepts, tools and scientific approaches (such as the Five Domains Model of welfare assessment). This includes awareness and assessments of behaviour as both a welfare indicator and welfare determinant, and assessment of mental wellbeing.
- In the absence of scientific evidence on how to meet the welfare requirements of a specific species of NTCa, evidence-based approaches to managing the welfare of similar species should be followed until more appropriate evidence becomes available. This approach is used under the Animals (Scientific Procedures) Act 1986.

**Keeping, breeding and sale of NTCAs**

**2)** 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. NB this principle should be applied across all companion animals, not solely NTCAs.

There should be mechanisms in place to ensure that NTCAs are only kept, bred or sold where there is a reasonable expectation that their five welfare needs can be met and that they will have a Good Life. This should be based on a complete assessment of published evidence and practical knowledge and experience. NB this principle should be applied across all companion animals, not solely NTCAs.

**UK Legislation**

At present there is fragmented legislation covering the keepership, breeding and sale of NTCAs across the UK, and we are concerned that these pieces of legislation are not effectively implemented or enforced.

Current legislation to safeguard the welfare of NTCAs and regulate their keeping and sale should be effectively implemented and enforced. Effective enforcement and implementation of existing animal welfare legislation and improved education of stakeholders is crucial to ensure a Good Life for NTCAs. To improve the existing legislative framework, consideration should be given to underpinning the UK Animal Welfare Acts with Codes of Practice for taxonomic groups.

**Figure 1 reproduced from Born Free and RSPCA's 2021 report [The Exotic Pet-demic](#). Summary of current UK legislation by activity and species covered. Superscript V denotes regulations that apply to vertebrates; superscript I denotes regulations that apply to invertebrates.**

Activities and species covered	Legislation
<b>Owners and keepers of all exotic animals<sup>V</sup> kept as pets</b> must take reasonable steps to meet their animals' welfare needs and prevent unnecessary suffering.	The ANIMAL WELFARE ACT 2006 in England and Wales, the ANIMAL HEALTH & WELFARE (SCOTLAND) ACT 2006 and the WELFARE OF ANIMALS ACT (NORTHERN IRELAND) 2011
<b>Keepers of specific 'dangerous wild animals'<sup>V,I</sup></b> require a licence from their local authority and are required to be inspected every one or two years when licences are renewed. The focus is primarily on protection of the public, although welfare is briefly touched on. Species classed as 'dangerous' are listed in Schedules to the Acts.	THE DANGEROUS WILD ANIMALS ACT 1976 in England, Scotland and Wales and THE DANGEROUS WILD ANIMALS (NORTHERN IRELAND) ORDER 2004.
<b>Businesses that sell animals<sup>V</sup> as pets</b> must be licensed by their local authority and inspected every one to three years for licence renewal. Licence terms vary across devolved administrations, and in some cases are at the discretion of the local authority. More recently	THE ANIMAL WELFARE (LICENSING OF ACTIVITIES INVOLVING ANIMALS) (ENGLAND) REGULATIONS 2018; THE ANIMAL WELFARE (LICENSING OF ACTIVITIES INVOLVING ANIMALS) (WALES) REGULATIONS 2021 and THE ANIMAL

<sup>2</sup> Mellor, D.J. (2016). Updating animal welfare thinking: Moving beyond the "Five Freedoms" towards "A Life Worth Living." *Animals*, 6(3), 21; <https://doi.org/10.3390/ani6030021> (accessed 09Aug2021).

<sup>3</sup> Webster, J. (2016). Animal Welfare: Freedoms, Dominions and "A Life Worth Living." *Animals*, 6(6), 35; <https://doi.org/10.3390/ani6060035> (accessed 09Aug2021).

<p>Introduced legislation includes a requirement for online businesses to obtain a licence, and expands the scope to businesses throughout the supply chain beyond those who sell directly to the public.</p>	<p>WELFARE (LICENSING OF ACTIVITIES INVOLVING ANIMALS) (SCOTLAND) REGULATIONS 2021; the PESHOPS REGULATIONS (NORTHERN IRELAND) 2000 and the WELFARE OF ANIMALS ACT (NORTHERN IRELAND) 2000.</p>
<p><b>Exhibiting animals,<sup>V</sup> or keeping or training them for exhibition</b> as part of a business in England requires a licence from a local authority, and in other nations registration (licensing is due to be introduced in Wales). This covers animals used in encounter businesses/mobile zoos in schools and parties, film, television programmes, adverts and theatre productions.</p>	<p>THE ANIMAL WELFARE (LICENSING OF ACTIVITIES INVOLVING ANIMALS) (ENGLAND) REGULATIONS 2018; the PERFORMING ANIMALS ACT (REGULATION) ACT 1925 in Wales and Scotland</p>
<p><b>Import and commercial use of certain threatened Species<sup>VI</sup></b> in international trade is regulated by international convention and associated domestic implementing legislation. The sale, display to the public or other commercial use, of species granted the highest level of protection (via listing on Annex A of the UK Wildlife Trade Regulations), requires an Article 10 certificate to demonstrate legal acquisition.</p>	<p>EU WILDLIFE TRADE REGULATIONS (EC) 338/97 implement the CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA (CITES). THE TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA (AMENDMENT) (EU EXIT) REGULATIONS 2018 made minor changes to EU Wildlife Trade Regulations when the UK left the EU. The CONTROL OF TRADE IN ENDANGERED SPECIES REGULATIONS (COTES) implements national measures in the UK, including defining offences and penalties.</p>
<p><b>Keeping and trading non-native species<sup>VI</sup></b> is controlled to prevent damage to the native environment. Releasing or allowing non-native species to escape is an offence. The keeping or selling of specific 'invasive alien species' (IAS) is strictly controlled. Currently, 30 species of animals are listed as IAS of concern because of their invasiveness and ability to establish in the wild. These species cannot be kept, sold, bred, imported or exported. Keepers of IAS species who had the animals before the species was listed can continue to keep these animals legally as long as the animals are permanently marked, securely kept and prevented from breeding</p>	<p>THE WILDLIFE AND COUNTRYSIDE ACT 1981 s14; THE INVASIVE SPECIES (ENFORCEMENT AND PERMITTING) ORDER 2019; THE WILDLIFE (NORTHERN IRELAND) ORDER 1985 (as amended) (articles 15 &amp; 15A) ;THE INVASIVE ALIEN SPECIES (ENFORCEMENT AND PERMITTING) ORDER (NORTHERN IRELAND) 2019</p>
<p><b>Keeping and trading certain native species<sup>VI</sup></b> is legally restricted. Keepers of listed bird species must be registered and minimum cage sizes are specified. The sale of wild birds and their eggs is regulated. It is also an offence to possess or trade specific native wild animals.</p>	<p>THE WILDLIFE AND COUNTRYSIDE ACT 1981 THE WILDLIFE (NORTHERN IRELAND) ORDER 1985 (as amended)</p>
<p><b>Taking certain species<sup>VI</sup> from the wild in the UK</b> is prohibited. Wild birds and their eggs and certain species listed on Schedule 5 cannot be taken from the wild, except under licence.</p>	<p>THE WILDLIFE AND COUNTRYSIDE ACT 1981 THE WILDLIFE (NORTHERN IRELAND) ORDER 1985 (as amended);</p>

**Improved regulation of keeping and sale**

The [Scottish Animal Welfare Commission \(SAWC\)'s interim report on exotic pets \(2021\)](#) recently concluded that: *"The evidence received by SAWC suggests that there are important animal welfare issues to address and that further regulation would be beneficial."*

**Interim conclusions:**

*Listing could form part of a multi-tier licensing approach, with a type of general licence to cover those animals listed as suitable for private keeping, and more specific licences available, when appropriate, for more experienced keepers with the knowledge and facilities to provide adequately for animals with more complex needs.*

*While SAWC has not formed a final view on the positive-list approach, it believes that there is merit in exploring this further, in order to promote the welfare of non-domesticated species kept as pets in Scotland.*

Consideration should be given to improving the regulation of keeping and sale of NTCAs. Mechanisms to control the keeping, breeding or sale of NTCAs could include improved regulation (eg. tiered/traffic light systems, positive lists, negative lists), strengthened licensing regimes (eg. Dangerous Wild Animals Act), prohibiting

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

Draft recommendations:

- We would support further regulation of the keeping and sale of NTCAs to ensure that only species where there this a reasonable expectation that their five welfare needs can be met and that they will have a 'Good Life' are permitted to be kept and sold. This could be achieved through a traffic light system or multi-tier licensing system. Such regulation should only permit the ownership and sale of certain NTCA species if they are in a permitted category (eg green category or equivalent). See **Annex A** for detailed considerations of different models of regulations which will be drawn out in the final BVA position statement
- Green category or equivalent should not be considered as easy to keep.
- To obtain animals listed in the permitted category, 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 eg. the Pet Know How test.
- This regulatory regime and relevant categories should be developed by an independent body; be based on scientific and objective evidence; have clear and transparent review processes; and ensure transitional arrangements for currently kept NTCAs in the form of grandfather provisions.
- In any formulation of grandfather rights, the veterinary profession should not shy away from presenting euthanasia as a humane and welfare-friendly alternative to long-term keeping in inappropriate conditions.
- Grandfather rights should only apply to the individual animal, and there should be a requirement for appropriate reproductive control decided in consultation with a veterinary surgeon to prevent breeding.
- We broadly support the recommendations set out by Toland et al (2020) and the use of species assessment systems eg those proposed by Schuppli, Fraser and Bacon (2014) and the questions from the EMODE system, to inform the development of any future regulation eg. traffic light systems or multi-tier licensing.
- It should be emphasised that this proposed model of regulation would represent a two-tier standard of knowledge and expertise, as opposed to a two-tier standard of welfare.
- Individuals who can demonstrate that they have a standard of expertise, appropriate facilities, and husbandry regimes to provide a Good Life for animals not in the permitted category should be able apply for a licence to keep such animals (eg. a positive list + licensing system, or 'amber' category) . Conservation should not be a considered a legitimate reason for keeping these animals, licences should only be granted to those who can demonstrate they are able to adequately provide for these animals' complex needs. Licensing requirements should be rigorous, require inspection from an inspector with species-specific knowledge, and the fulfilment of a knowledge-based test by the keeper.

Pet vending regulations

- England, Wales and Scotland had detailed legislation and licensing conditions to safeguard welfare in pet vending establishments through the Animal Activities Licensing regulations. In contrast, Northern Ireland regulated pet vending through the Northern Ireland Pet Shop regulations, which have significantly less detailed licensing conditions with regard to animal welfare, and no species-specific guidance.
- Northern Ireland pet vending regulations should be brought in line with the more detailed licensing required in the rest of the UK
- In England and Wales, the current two-tier system of minimum standards and higher standards was confusing and added an extra layer of complexity to inspections and compliance. It would be preferable to have a single standard as in Scotland.
- We are concerned that that the original process for developing the Defra guidance and standards did not allow sufficient time for veterinary input and scrutiny, and there was a lack of transparency about the process underpinning the development of the guidance.
- The current Defra guidance (and proposed Wales guidance) did not make it clear enough that the licensing standards for pet vending should be considered as a temporary restriction in welfare while animals are offered for sale and that enclosure sizes etc may be smaller than those intended for long term husbandry. The guidance should explicitly state that these standards are not suitable for long-term husbandry and keeping. We are concerned that without this explicit statement, the guidance could be used in a welfare case as a defence for poor welfare standards in a private setting.
- While the current guidance for England and Wales does specify that animals should not be kept in these transitional conditions for more than 3 months, this period may be too long for some species.
- While we recognise that it may not be practical for pet vendors to display animals high welfare conditions due to size restrictions, members were concerned that displaying animals in conditions intended for temporary holding (ie. a temporary restriction in welfare conditions) may normalise these standards in public perception. This could result in owners thinking that these conditions are appropriate for long term husbandry and keeping. As far as possible, pet vendors should act as role models for pet owners, and

display animals in conditions that are conducive to positive welfare. This should not just be limited to those animals on display, but also animals kept off the shop floor.

- To this end, enclosure sizes should be the same across all licensable activities as is the case in Scotland's guidance
- Displaying animals in conditions conducive to positive welfare eg. with appropriate enrichment, may confer advantages to pet vendors and result in increased sales of enrichment equipment, materials and accessories.
- Often local authority inspectors have a broad range of responsibilities beyond just animal welfare and so may not be appropriately trained in assessing the impact of conditions on animal welfare. That being said, it is important to recognise the resource pressures currently placed on local authorities.
- Point of sale information is still often inadequate, consideration should be given to introducing a pre-purchase knowledge test

#### Draft recommendations:

- Licensing conditions and guidance for pet vending in England, Wales and Northern Ireland should be reviewed. Licensing regimes should include a single system of detailed minimum standards for pet vending as in Scotland (as opposed to the current two-tier system of minimum and higher standards in England and Wales, and lack of detail in the Northern Ireland Pet shop regulations)
- Minimum standards should be evidence-based (making use of the hierarchy of evidence) and developed by an independent body with veterinary input. As part of this there should be a clear consultation process for stakeholders to input, review and scrutinise proposed standards, led by central government.
- The UK Governments should commission a literature review across species to inform the development of pet vending minimum standards. As part of this consideration should be given to whether 3 months (as specified in the England and Wales guidance) is an appropriate time to keep animals in temporary conditions that are not optimal for welfare.
- In any licensing regime, pet vendors should be encouraged to role model higher welfare conditions to prospective pet owners, both on and off the shop floor. In addition, enclosure sizes should be the same across licensable activities.
- Until this review is conducted, current pet vending licensing guidance should explicitly state that the minimum standards set out in the guidance documents are not suitable for long-term husbandry and keeping.
- Government should also consider establishing ethical review boards at a local authority level to consider pet vending licensing applications before they are granted. These should be comprised of individuals with appropriate skills to appraise likely animal welfare implications of applications and make considered ethical judgements on whether licenses should be granted.
- There should be appropriate training in animal welfare for all local authority officers responsible for conducting inspections of pet vending establishments (and licensable animal activities more widely)
- Consideration should be given to introducing a pre-purchase knowledge test to ensure prospective owners know how to provide a Good Life for NTCAs.

#### Regulation of rehoming activities

##### Legislative landscape

In England, Wales and Northern Ireland, rehoming activities and sanctuaries are unregulated. On 1 September 2021, Scotland implemented the Animal Welfare (Licensing of Activities Involving Animals) regulations which includes provisions for the licensing of premises operating as animal welfare establishments and rehoming centres. See interim guidance at Annex A, this will be supported with more detailed guidance in due course.

Under the Regulations means any operator that supplies an animal as a pet to a person in Scotland is required, subject to some exceptions, to be licenced if the following conditions are met:

- the person being supplied physically receives the animal in Scotland, and
- the supply takes place during a 12 month period in which at least 4 other animals are supplied by the operator as pets to persons in Scotland.

Rehoming will require a licence where 5 animals are supplied as pets in a single movement or where 5 animals are cumulatively supplied as pets over the course of a 12-month period. This activity relates to both the rehoming of animals originating within and outside Scotland.

##### NTCA-specific challenges with the current situation:

- Potential for poor facilities (housing, nutrition, hygiene, biosecurity)
- Overcrowding of animals

Inadequate funding for the number of animals, which can impact feeding, facilities and access to veterinary care

- Inappropriate mixing of predator and prey species in the same room
- Inappropriate mixing of animals before any disease screening
- Animals in centres often have complex behavioural and medical needs which makes them harder to rehome
- There can be pressure to re-home in tight timeframes in order to reduce number of animals at the centre. This can result in rehoming into inappropriate new homes. Equally, the opposite can occur whereby centre owners consider few homes to be appropriate and therefore hoard more animals than they care able to provide care for
- No clear demarcation of when a re-homing centre becomes a long-term sanctuary. Few centres have proper long-term facilities (e.g. Global Federation of Animal Sanctuaries (GFAS) standard) so animals are kept in what is meant to temporary accommodation for long periods
- Issues around appropriate preventative healthcare (neutering, vaccination) prior to rehoming
- Inadequate provision of veterinary care
- The minimum standards for pet shops in terms of both facilities and information supplied to new owner do not apply to rehoming centres
- There is a lack of clarity as to which animals belong to the centre/ centre owner, and which are available for rehoming.
- 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 this principle, notwithstanding the challenges presented by rehoming centres with 'no kill' policies.
- Rehoming guidelines existed under the Animals (Scientific Procedures) Act 1986 and could be a useful reference point.
- 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.
- In any licensing regime, rehoming centres should be encouraged to role model higher welfare conditions to prospective pet owners, both on and off the shop floor. In addition, enclosure sizes should be the same across licensable activities.

Draft recommendations (NB – this should be presented alongside pet vending licensing recommendations in final position)

- 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, should be implemented. (see above section on pet vending licensing)
- Provisions in Scotland for the licensing of premises operating as rehoming centres could represent useful model and had set a helpful precedent. It would be useful to monitor the effectiveness of their implementation going forward.
- 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.
- 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.

Adequacy of the Dangerous Wild Animals Act

Legislation

The Dangerous Wild Animals Act (DWAA) was introduced to regulate the keeping of dangerous animals to protect public safety. Anybody intending to keep an animal listed in the Act must apply for a licence from the local authority. To grant DWA licence, the local authority must be satisfied that:

- it is not contrary to the public interest on the grounds of safety, nuisance or otherwise to grant the licence;
- the applicant for the licence is a suitable person to hold a licence under this Act;
- any animal concerned will at all times of its being kept only under the authority of the licence—
  - a. (i) be held in accommodation which secures that the animal will not escape, which is suitable as regards construction, size, temperature, lighting, ventilation, drainage and cleanliness and which is suitable for the number of animals proposed to be held in the accommodation, and
  - b. (ii) be supplied with adequate and suitable food, drink and bedding material and be visited at suitable intervals;
- appropriate steps will at all such times be taken for the protection of any animal concerned in case of fire or other emergency;
- all reasonable precautions will be taken at all such times to prevent and control the spread of infectious diseases;
- while any animal concerned is at the premises where it will normally be held, its accommodation is such that it can take adequate exercise.

### Role of vets

On behalf of the local authority, before the licence is granted a veterinary surgeon must inspect the premises where the animal is to be kept and produce a report to indicate whether the animal can be suitably held there (in line with the legislation) and describing the premises. However, a vet is only required for the first inspection. Vets are typically used for subsequent inspections, but it can be a non-vet as long as long as deemed competent e.g. a licensing officer from the LA. Ultimately, the decision to award the licence resides with the licensing authority, not the vet, however they should take into consideration the vet's inspection report and recommendation. [BVA and BVZS have previously produced an inspection template to support vets in conducting these inspections.](#)

In [their advice for Dangerous Wild Animal Act inspections](#) (2014), BVZS set out that:

*“[We] believe it is advisable that only individuals with the relevant experience of the species under consideration would be advised to carry out inspections for DWA licences. Such individuals may be listed on the Secretary of States List for Inspections under the Zoo Licensing Act 1981 or possess recognised post graduate qualifications in zoological and wildlife medicine.*

*We believe unsuitably, qualified inspectors risk a Regulatory complaint for practising outside their expertise or significant civil claims if rejection of a licence leads to the applicant, such as a pet shop owner, suffering a financial loss.”*

### Species

The species included in the Dangerous Wild Animals Act are listed in [the Schedule to the Act](#). A [2020 Born Free survey](#) found that 4,000 dangerous wild animals are being privately kept in Great Britain, under licence. The data collected from local authorities highlighted that in 2020, a total of 210 DWA licences were granted for the keeping of 3,951 individual wild animals including:

- 320 wild cats (including 61 big cats – 11 lions, eight tigers, 11 leopards, 18 pumas, 10 cheetahs, two ligers and one jaguar)
- 274 primates (including over 150 lemurs)
- 158 crocodilians
- 508 venomous snakes (including 57 diamondback rattlesnakes)
- 332 scorpions
- 106 venomous lizards
- Two elephants.

Other species on the DWA list that are being kept as pets or in private collections in the UK include zebras, camels, fossa, hyena, sun bears, wolves, and otters.

### Challenges with the Act

#### Legislation

The Dangerous Wild Animals Act, applied in conjunction with other legislation (eg. UK Animal Welfare Acts), could be considered adequate, however enforcement was a significant gap.

- The emphasis of the act is on public safety, specific references to welfare in the act are limited to ensuring suitable accommodation / environment / food and water only. Welfare needs are the same across situations, therefore welfare standards should be applied consistently regardless of the status of the collection and which piece of legislation they are regulated by. The Dangerous Wild Animals (Northern Ireland) Order 2004 aims to combine public safety and animal welfare and is therefore a potentially useful model.
- There are no minimum welfare standards that licensees must meet when keeping an animal under licence. However this could be mitigated if the Animal Welfare Acts were effectively enforced and/or the Secretary of State's Standards for Modern Zoo Practice were referenced in the legislation. However, Many DWA license holders were very good and provided conditions which were better than those in zoos. It is important to emphasise that rigid requirements on elements such as size of enclosure inevitably would mean that some keepers would only aim to meet baseline standards.
- There is no central register of animals currently kept under DWA licence so it is difficult to understand how many DWA animals are kept or to understand enforcement data across local authorities.
- Anybody can be in possession of a dangerous wild animal without a licence but the keeper must have a licence, this means that no DWA licence is required for dangerous wild animals transported into the UK and these animals are then untraceable once they've entered the country as there are no DWA border controls.
- Pet shops are exempt from the DWA, and the sale of DWA animals is not legally regulated
- 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.

#### Role of vets in inspection and licensing

- 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.
- 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.
- 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'.
- Veterinary capacity to complete appropriate training and carry out inspections is 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.

#### Licensing authority

- At present Local Authorities vary in their approach to DWA inspections and any registered veterinary surgeon can be approached by local authorities to carry out DWA inspections. There is a need for a consistent approach using suitably qualified veterinary inspectors.
- Licences can be awarded retrospectively, to avoid complicated situation of local authority having to determine future of DWA animals already in possession by the keeper and having to seize animals
- A vet is only required for the first inspection. Vets are typically used for subsequent inspections, but it can be a non-vet as long as long as deemed competent e.g. a licensing officer from the LA.
- Licensing Officers often minimal or no experience , and variable understanding of the DWA-
- There is variable distribution of ownership of the licensing function across local authorities - food, environment, licensing, etc
- Variable to no follow up
- Limited powers - magistrate required to remove licence
- Variable to no resources for enforcement data collection
- Variable to no resources for prosecution



- There were inconsistencies with the current list of DWA species, particularly with regard to some species that posed a public health risk as opposed to a physical safety risk and had not been included in the DWA.
- The list of species on the DWA should be reviewed by an independent group. Selection criteria for species on the DWA should take into account public health (eg risk of zoonoses), public safety and animal welfare.
- In any review it would be important for attention to still be paid to any risks to public safety to reassure the wider public that this had not been lost

Draft recommendations

We recognise that as we are calling for the establishment of a traffic light system or equivalent, with licensing for species not on the green list where welfare needs can be met by suitable persons, this regulatory regime would likely supercede the Dangerous Wild Animals act. However, while the Dangerous Wild Animals Act remains in force, we have considered the current challenges and are calling on the UK Governments to implement the following recommendations to safeguard animal welfare and public safety:

- Licence applicants/holders should be required to meet a set of minimum standards, mirroring those required for zoos
- These standards should include safety and animal welfare (including for invertebrates) , including behavioural needs, and must be inspected against and enforced. It is important to recognise that the Animal Welfare Act(s) protected the animal welfare element absent from the DWAA. Cross referencing could be a solution.
- Standards should match zoos from a safety/containment perspective.
- Euthanasia of the animal(s) should be seen as an appropriate solution to non-conformance from a keeper.
- Vets should be supported to inspect with clear guidance/templates.
- Further consideration is 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.
- In the short-term, there should be a review of species on the DWA. This should be conducted by an independent group and be based on scientific evidence. Species selection criteria should include public health (eg. risk of zoonoses), animal welfare, as well as public safety.
- In the longer term, future regulation of NTCA ownership (eg. traffic light systems) should ensure that species selection criteria includes consideration of public health (eg. risk of zoonoses), animal welfare and public safety.

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

- 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.

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.

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 (ie 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.

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.

**4) 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)**

Improved regulation of online sales

The rise in online selling platforms is increasing the opportunity to trade and purchase NTCAs (and companion animals more widely) with minimal oversight or regulation.

For NTCAs, this can lead to poor animal welfare, issues of public healthy and safety, and negative environmental and conservation impact if sellers list species that cannot be kept without a licence or do not list key background and welfare information regarding NTCAs that can be kept without a licence. Buyers may purchase animals without understanding their species-specific welfare needs, or their legislative responsibilities.

In the report [‘One Click Away’](#), The Blue Cross and Born Free Foundation analysed six popular online sites over a three month period in 2015, and found at least 53 different types of reptile, 37 types of exotic bird, 28 types of exotic mammal, and seven types of amphibians advertised for sale in the UK, most without basic advice to potential buyers on how to keep the animals.

In addition, the sale and promotion of NTCAs on social media by private individuals is of particular concern. While we recognise that for many social media platforms the sale or exchange of animals between private individuals is technically prohibited, we are concerned this is occurring in closed groups. This has the potential to undermine efforts to educate the public about responsible procurement of pets and the complex welfare needs of NTCAs, as well as increasing demand for NTCAs by normalising them as pets which are easy to acquire.

Under the England, Wales and Scotland Animal Activities Licensing regs when advertising pets for sale all licensed sellers must:

- include the number of the licence holder’s licence,
- specify the local authority that issued the licence,
- if the animal being advertised is a dog or cat, include a recognisable photograph of the animal,
- (except in the case of fish) display the age of the animal being advertised,
- state the country of residence of the animal from which it is being sold, and
- state the country of origin of the animal.

From September 2021, under the Animal Activities Licensing (Scotland) regulations local authorities are now required to publish a register of licences that is publicly accessible. This may enable websites and buyers to check the legitimacy of the seller.

PAAG has created a set of [Minimum Standards](#) for classified advertising websites (including health and welfare requirements), which we strongly support. These standards aim to ensure that both buyers and sellers are purchasing pets in a safe and responsible environment. We welcome engagement from classified advertising websites to implement these standards, and their engagement with the PAAG Exotics subgroup which has

recommended lists of 'blacklisted' words, lists of NTCA species that require a licence or CITES certificate, and NTCAs which have welfare needs so specialised they should not be advertised for general sale.

Data collection and monitoring

- We welcome initiatives such as Tech4Pets which use technology and Open-Source Intelligence techniques to monitor online pet sales and dismantle pet trafficking networks through the analysis of data.
- Data is an asset for monitoring and tackling irresponsible pet sales. Data is helpful for horizon-scanning but could also be used reactively to sting a particular activity or look at trends (eg 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 fulfils an important function in that it encourages sites to compete with each other on offering better welfare as a USP. This then helps to corral those trading on lower welfare into a place where they can 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.
- There is 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.
- Initiative such as Tech4Pets can help assess effectiveness of disruptors by monitoring data shifts when interventions were trialed.

Draft recommendations

PAAG recognise that as long as PAAG's standards are voluntary, there is a limit to their impact as not all websites are willing to adopt them and there is no legal obligation for them to do so. We would support further regulation of online sales, and in particular advertising on third party sites. We support PAAG recommendations for further regulation, 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.

Additional recommendations around data and disruptors:

- We welcome initiatives such as Tech4Pets which use technology and Open-Source Intelligence techniques to monitor online pet sales and dismantle pet trafficking networks through the analysis of data.
- The effectiveness of online disruptors that would influence purchaser behaviour should be explored to promote responsible animal purchasing online.

**Transport**

**International trade in NTCAs**

- |           |   |
|-----------|---|
| <b>5)</b> | <b>Importers and those who trade animals should be regulated in order to control the trade, increase traceability and improve animal health and welfare</b> |
|-----------|---|

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

- 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 was, or should be, a shared responsibility between exporter and importer for ensuring good welfare during transport.
- International Air Transport Association (IATA) [Live Animals Regulations](#) is 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
- Fish are largely transported in complete environments and packed according to IATA regulations. Ornamental Aquatic Trade Association (OATA) have their own transport code of conduct which members must adhere to.
- There were also potential issues with transport within the UK (eg sending NTCAs via courier). Although Royal Mail did not permit live fish, it was unclear to what extent this was checked.
- Prospective owners should be encouraged to source NTCAs from UK-based responsible breeders (eg. assured breeder scheme for NTCAs captive-bred in the UK), or industry should be encouraged to develop a transport kitemark which would provide assurances that welfare standards have been met throughout the journey.

Draft recommendations:

- 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.

**Sustainability**

**6) 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.**

**Wild capture:**

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.

**It was recognised that there are wild caught pets that are not sold as pets but used as breeding stock for the pet trade (ranching systems). NB working group need to clarify whether this is included in the definition of wild caught/ views on ranching**

**Negative impacts**

- 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 impact 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

**Positive impacts**

However, it is important to recognise that 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 include:

- It provides vital livelihoods for tens of thousands of fishermen and communities in remote areas that have fewer employment opportunities and less welfare provision
- Local people use and maintain local resources to make a living
- The source country benefits are monetary, technological and information-based
- Fishkeepers are knowledgeable of habitats like reefs and rainforests and are empathetic to their conservation needs

**Draft recommendations:**

- BVA supports a ban on the import of all wild-caught animals for non-conservation reasons, including fish. Fish are sentient and therefore there is no justification for making an exception for wild caught fish.
- We recognise that the wild-caught fish trade may confer positive social and ecological benefits in the context of international development. However, As an animal-welfare focussed profession, our position is primarily informed by animal welfare considerations, which, for the veterinary profession, are not outweighed by potential social and ecological benefits. Conservation should occur for its own merits.
- Prospective owners should consider the provenance of NTCAs and whether they have been responsibly sourced. In addition, consideration could be given to the development of an assured breeder scheme for NTCAs that have been captive-bred in the UK.
- 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.

**7) Consideration should be given to the health and welfare of British wildlife that is caught in the wild, inappropriately kept as an NTCA, and those that are subsequently released back into the wild.**

**8) Consideration should be given to the health and welfare of those animals kept and killed to produce food for NTCAs**

- 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.
- 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 acknowledge in the position.
- It could also be helpful to reference BVA lines on vegetarian and vegan pet food and the importance of appropriate nutrition.

**The role of the veterinary professions**

9) **Enhancing, protecting and securing the health and welfare of animals is the fundamental purpose of the veterinary professions. The veterinary professions should therefore work to advance the health and welfare of NTCAs at individual, community, national and international levels.**

10) **The veterinary professions are animal welfare-focused, as distinct from client-focused or vet-focused. Improving animal welfare is the profession’s explicit aim and primary motivation – working with clients and animal-using industries, and being commercially viable, are enablers for the veterinary professions to improve animal welfare.**

11) **The veterinary professions should be supported to manage and improve the health and welfare of NTCAs through undergraduate and post-graduate education, and access to appropriate veterinary medicines**

Undergraduate education and training

The [RCVS Day One Competences](#) describe the knowledge, skills and attributes required of veterinary students upon graduation to ensure that they are prepared for their first role in the profession and safe to practise independently. To graduate, students are expected to demonstrate that they can meet the Day One Competences and are omnicompetent (or have omnipotential) to work across species.

Vet schools are responsible for developing the Day One Competences of their students through their curricula and ensuring that they have met the competences by the time they graduate.

Curricula and clinical teaching in NTCAs vary between vet schools. Some schools eg. Edinburgh and RVC have their own exotics department, service and clinical rotations, others have no defined department, relying on external lecturers, students’ exposure to NTCAs during EMS placements. In some schools NTCA teaching is optional or provided in extracurricular activities eg. clinical clubs, as opposed to being built into the curriculum

Emergency care (joint responsibility of vet and owner)

The [RCVS Code of Professional Conduct](#) states:

1.4 *Veterinary surgeons in practice must take steps to provide 24-hour emergency first aid and pain relief to animals according to their skills and the specific situation.* Part 1 of the [RCVS supporting guidance](#) sets out the key professional and legal responsibilities for veterinary surgeons in relation to emergency care, including:

*“All veterinary surgeons on duty should not unreasonably refuse to provide first aid and pain relief for any animal of a species treated by the practice during normal working hours, or for all other species until such time as a more appropriate emergency veterinary service accepts responsibility for the animal”*

The guidance also states that the responsibility for the welfare of an animal ultimately rests with the owner, keeper, or carer, with owners being responsible for transporting their animals to a veterinary practice, including in emergency situations

Further observations to draw out in final position:

- The focus on referral casework in some vet schools may set an unrealistic expectation as to what is expected from a graduate in first opinion practice.
- It was important to reset the expectation that just because you can’t do everything for an animal doesn’t mean you can’t do anything (ie. provide first aid, pain relief or euthanasia)
- As the majority of graduates go into first opinion practice after graduation it is reasonable to expect that on graduation students should be equipped to provide first aid and euthanasia to NTCA species.

It is important that first opinion practitioners are able to confidently: handle NTCAs, conduct a clinical examination, use the cascade appropriately (due to a lack of licensed products for NTCAs) and be able to identify what is normal for the species.

- Recognising that there is already pressure to cover a breadth of common species in vet school curricula, emphasis could be placed on transferrable skills and how these can be applied to NTCA species eg. by using NTCA species in case work ups
- Models of future regulation of NTCA ownership (eg traffic light systems) could require that specific species with complex needs (eg. those requiring a licence) only receive veterinary care from Advanced Practitioners. This may take the pressure of first opinion vets who feel that providing more in-depth care/treatment to these species would be outside their area of competence.
- If practitioners are not confident and competent in handling NTCAs it can be dangerous both for the animal and the staff member.

**Vet nurses**

- RCVS was currently consulting on Day One Competences for VNs. This was an opportunity to reiterate that equal weighting should be given to NTCA species alongside cats and dogs, and that there should be parity in the teaching time allocated to these species.
- Diploma level teaching for NTCAs was good, however access to practical experience depended on where nurses are in the country.
- Veterinary nurse diploma courses were largely delivered through VetSkill. In terms of NTCA teaching, VetSkill courses only covered cat, dog, rabbit and guinea pigs. There was no scope in the course for reptile, small mammal or avian species. Teaching is integrated across anatomy and physiology, disease etc, so there is no set teaching for NTCAs within the course.

**Draft recommendations**

- Vet schools should continue to embed the teaching of basic care for NTCAs within their curricula. Species covered could align with permitted species set out within any future models of regulating NTCA ownership
- All vets should be able to confidently:
  - handle NTCAs;
  - conduct a clinical examination;
  - use the cascade appropriately (due to a lack of licensed products for NTCAs);
  - identify what is normal for the species;
  - understand NTCA husbandry requirements; and
  - provide first aid, pain relief and euthanasia.

12)

Support for first opinion practitioners

To support first opinion practices to confidently provide first aid and emergency care to NTCAs, the working group agreed that the position should:

- Signpost to existing resources to support first opinion practitioners and encourage the profession to make use of these. There is already a range of resources out there for first opinion vets eg. BSAVA foundation manuals, formulary and PDP resources. [populate position with resources list developed by working group]
- Encourage the profession (both at individual and association-levels) to build relationships with species/breed clubs, representative bodies and pet retailers to foster a relationship of trust and facilitate knowledge exchange
- Highlight that peer-to-peer support was incredibly useful; the bond between first opinion practices and exotic referral practices should be cultivated and facilitated.
- Highlight that it would be useful for BVZS to develop a simple resource for GP vets around providing first aid and euthanasia

13)

Post-graduate training and career development

Barriers to specialist status

To be included on the List of RCVS Specialists an individual must have achieved a postgraduate qualification at least at Diploma level, and must additionally satisfy the RCVS that they make an active contribution to their specialty, have national and international acclaim and publish widely in their field.

Specialist status is time-bound, and the individual must reapply for recognition every five years (or earlier in certain cases) to maintain their name on the List.

Both new and re applicants must hold one of the following qualifications at the date of application:

- An RCVS Diploma, RCVS approved European College Diploma, American College Diploma or Fellowship of Australian and New Zealand College of Veterinary Scientists in, or relevant to, the specialty concerned.
- The RCVS Diploma of Fellowship gained by Examination<sup>1</sup>, or by Meritorious Contributions to Learning (MCL)<sup>2</sup>, in a subject which is in, or relevant to, the specialty concerned; or
- A postgraduate qualification (see Section D), other than a named RCVS Diploma or a Diploma of Fellowship by Examination or MCL, which you wish to submit for consideration by the RCVS for this purpose, which is in, or relevant to, the specialty concerned.

Reported barriers to specialist status in NTCA species include:

- As RCVS are no longer an awarding body of qualifications, there is no NTCA-focussed RCVS diploma, that vets can undertake from practice. BVZS members have reported finding themselves 'stuck' at advanced practitioner level without a pathway to specialist unless they undertake residency.
- The American College of Zoological medicine offers post-graduate qualifications which do not require residency. Although routes to specialisation are limited it is important to note the options.
- The College grants recognition as a European Veterinary Specialist in Zoological Medicine to those who have successfully passed Specialist Diplomate examinations, after undertaken a rigorous minimum 3-year period of training, supervised by a Specialist (ie. residency). However for other disciplines there are well structure training routes (alternative pathways) that can be undertaken in general practice
- European colleges in other disciplines (e.g. sheep health and production) offer well-structured routes to specialisation that can be undertaken in general practice. This could be used as an example in the final position
- There is disagreement within the European College as to what 'specialist' should mean in terms of which and how many species an individual can and should cover. Therefore, Howev before an alternative pathway could be established, the European College would need to achieve a consensus view on the definition and scope of NTCA specialists
- There are issues around the need for a European College Diploma (and residency training) vs those who have acquired specialist status via other means (for the European College this is largely via grandfather status).
- Consideration could be given to the development of an academic qualification for first opinion practitioners that was led and awarded by a university
- Consideration could be given to establishing different tiers of specialism to allow further career development opportunities for vets in first opinion practice, however this would need to be considered across all species, not solely NTCAs.
- It was noted that future regulation of NTCA ownership may provide a mechanism through which to formally recognise Advanced Practitioner status by requiring licensed animals to be registered with Advanced Practitioners, or those with suitable experience or competence.
- There are very few residencies available in NTCA species

Opportunities to specialise and develop in NTCAs for VNs

- There is currently the Vet Nursing of Zoo and Exotic Species Certificate, which covered five modules in detail. At present however the certificate was theory-based, and did not include case work
- There is an opportunity to build on this certificate to develop an advanced nursing diploma in NTCAs, including the opportunity for case work

Draft recommendation

- Opportunities to specialise are important for both vets and VNs, both in terms of career satisfaction, recruitment and retention and professional development. Alternative pathways to specialist status should therefore be explored and developed by relevant stakeholders.



There is currently a wide range of CPD for first opinion practitioners. Some providers have reduced their provision as take up is variable. However, it is important to recognise that first opinion vets who have limited time may prioritise CPD related to more commonly kept species seen in practice

- The more specialised vets become the harder it is to find CPD at an appropriate level, however there are specialist societies to join, and attendance at European and other international meetings would be useful
- It is important to manage expectations around what CPD courses will be able to provide delegates with. A growth development mindset should be cultivated, where there is recognition that development is not instant and relies on practice and consolidating knowledge through experiential learning.
- There is often a misunderstanding about the different forms CPD can take and that it should only be course-based. It is important to emphasise that CPD is fundamentally about reflection and outcomes. This could include case discussions, reading around a case, podcasts, peer-to-peer support.

Draft recommendations:

The BVA position should highlight and recognise that:

- CPD is not just about courses and vets and vet nurses should be encouraged to recognise that CPD can take different forms.
- The importance of having a growth mindset and recognising the importance of development through experiential learning and peer-to-peer support on NTCA cases

15)

References (not exhaustive, additions welcome as discussions progress)

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- Tatjana Hoehfurtner, Anna Wilkinson, Matthew Walker, Oliver H.P. Burman, Does enclosure size influence the behaviour & welfare of captive snakes (*Pantherophis guttatus*)?, *Applied Animal Behaviour Science*, Volume 243, 2021, <https://doi.org/10.1016/j.applanim.2021.105435> (<https://www.sciencedirect.com/science/article/pii/S0168159121002227>)
- This study showed that overall, 3.6% of snakes, chelonians and lizards died within one year of acquisition. Boas and pythons had the lowest reported mortality rates of 1.9% and chameleons had the highest at 28.2%. More than 97% of snakes, 87% of lizards and 69% of chelonians acquired by respondents over five years were reported to be captive bred:  
Robinson JE, St. John FAV, Griffiths RA, Roberts DL (2015) Captive Reptile Mortality Rates in the Home and Implications for the Wildlife Trade. *PLoS ONE* 10(11): e0141460. <https://doi.org/10.1371/journal.pone.0141460>  
<https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0141460>
- This study reviews the benefits, animal welfare risks and public health risks of keeping reptiles and amphibians in captivity: Pasmans F, Bogaerts S, Braeckman J, Cunningham AA, Hellebuyck T, Griffiths RA, Sparreboom M, Schmidt BR, Martel A. Future of keeping pet reptiles and amphibians: towards integrating animal welfare, human health and environmental sustainability. *Vet Rec.* 2017

- See Annex B for references relating to welfare issues in specific taxonomic groups (chameleons and parrots)

## Annex A – Different models of regulation

### 1) Maintaining the status quo

In discussion it was noted that:

- Maintaining the status quo was inadequate as more needed to be done to improve the welfare of NTCAs kept without a licence. The working group should be aspirational in its recommendations, and propose further regulation
- The Scottish Animal Welfare Commission's interim report on exotic pets (2021) had recently concluded that: *"The evidence received by SAWC suggests that there are important animal welfare issues to address and that further regulation would be beneficial."*
- Consideration should be given to the wider regulation of trade and keeping of all pets, not solely NTCAs. However it was recognised this was out of scope of the working group
- Consideration should be given to the potential unintended consequences of increased regulation of trade and keeping of NTCAs eg. driving ownership and trade of particular species underground; owners not seeking veterinary care; the veterinary profession being required to police new regulations.
- If increased regulation were to be introduced, consideration would need to be given to existing animals through grandfather rights. The aim of regulation should be to prevent further animals entering into the pool. However, consideration should be given to long-living species that are currently kept eg. parrots who may remain in inadequate conditions for the rest of their lives, which may be decades.
- Consideration should be given to the moral stress of the veterinary professional in any transition period to increased regulation eg. if euthanasia were required, or vets were concerned that they had to provide care for certain species of NTCAs that weren't permitted under new regulations.

### 2) Self-regulation

In discussion it was noted that:

- Self-regulation was not an adequate solution, and had not been effective to date, particularly amongst general keepers. However, anecdotally it was recognised that self-regulation tended to work better for keepers of more unusual species as owners tended to have pride in their expertise
- The limitations of this approach highlighted by SAWC were noted, including:
  - While trade associations may be able to regulate their members, they seldom cover the entirety of their sector.
  - Rules and codes of practice are unlikely to carry any sanction beyond removal of association membership, which places non-compliant traders outwith the aegis of even a voluntary regulatory regime.
  - Any self-regulation system would only be a partial solution as it can only apply to trade and industry and not to private keeping, as this would be impossible to enforce without any oversight body.
- Experienced keepers may be providing for good health, however this did not necessarily correlate with good welfare.

### 3) Licensing

In discussion it was noted that:

- Licensing serves to regulate the keeper as opposed to the animal. Licensing of the vendor was also required
- Any licensing system should be based on full cost-recovery to support effective enforcement
- Consideration could be given to a hybrid model of licensing in conjunction with a positive list. It was noted that SAWC had highlighted that approach could be taken in its interim report on NTCAs: *"Listing could form part of a multi-tier licensing approach, with a type of general licence to cover those animals listed as suitable for private keeping, and more specific licences available, when appropriate, for more experienced keepers with the knowledge and facilities to provide adequately for animals with more complex needs."*
- BVZS did not support a general licensing regime due to concerns that it would not be practically possible for local authorities to enforce due to resources and a lack of expertise across all species, and it may become discriminatory in terms of pet ownership if certain demographics could not afford the licensing fee
- Consideration could be given to incorporating a knowledge test and certification into a licensing regime, so that owners are required to demonstrate their knowledge before purchase. However, it was noted that this approach has not been effective on its own at improving welfare for bearded dragons kept in Victoria, Australia.

British Veterinary Association  
4) Negative lists

In discussion it was noted that:

- Negative lists were the weakest mechanism for improved regulation as they were difficult to enforce, and require a high level of monitoring by authorities as new species come into trade, or species classifications are updated.
- Implementation of negative lists could drive NTCA ownership and trade underground, and also lead to abandonment of existing NTCAs.
- In Norway, legislation previously prohibited the trading and keeping of exotic pets on animal welfare grounds. Despite the ban, it was reported that importation, trading, and keeping of amphibians and reptiles persisted on a substantial scale. In 2018 the Norwegian government therefore introduced a positive list in the hope it would reduce the illegal trade, and keepers would be more inclined to seek veterinary care for their animals without fear of being reported to the authorities.

5) Positive lists

In discussion it was noted that:

- In light of provisions included in the primates section of the Kept Animals Bill, Defra were already considering positive lists, and Born Free and RSPCA had recently called for the implementation of a positive list in their report '[The Exotic Pet-demic](#)'.
- Of the methods of regulation considered, it was felt that positive lists had the potential to be the most effective and the most in line with the working group's underpinning principles.
- Some people may incorrectly think that where a species is included on the positive list they are easy to keep and this could have the unintended consequence of making the ownership of certain species appear more attractive. Clear messaging would therefore be required to emphasise that if a species is on the positive list this does not make them easy to care for.
- Positive lists should not be formulated based on animals that are currently kept. Species selection for positive lists should be undertaken by independent parties using scientific, evidence-based, and objective sources.
- Consideration would need to be given to the transition period and what would happen to currently kept species that did not appear on the positive list. eg. grandfathering rights and quality of life considerations if animals were to be sent to re-homing centres/ sanctuaries (ie. husbandry and welfare conditions may not represent an improvement to those that the animal was kept in by their original keeper). It was also noted that while euthanasia of these animals would not present a welfare issue, it would pose a communications challenge to the public, and a wider ethical challenge for the profession (eg. risk of moral injury).
- The implementation of a positive list could lead to relinquishment of NTCAs, even if grandfather rights were introduced.
- Classifications of species are fluid and constantly being updated, therefore there should be specified review periods to keep the list up to date and consider whether species should be added/removed from the list.
- It may be challenging to include fish in a positive list system given the breadth of species kept.

6) Selection criteria for positive lists

In discussion it was noted that:

- Species selection should be evidence-based, conducted by an independent body, and have specified review periods to keep the list up to date and consider whether species should be added/removed from the list.
- There was broad support for Toland et al.'s (2020) recommendations for the development of positive lists. However, the group considered that there should only be exemptions for individuals who can demonstrate they have a standard of expertise, appropriate facilities, and husbandry regimes to provide a Good Life for animals not on the positive list. A licensing regime should be used to ensure these individuals can meet this threshold. Conservation should not be considered a legitimate reason for keeping these animals. In addition, the group felt that there should be restrictions on the ability of rescue shelters and sanctuaries to accommodate unwanted, abandoned or seized animals, depending on the quality of life and conditions that they are able to provide for these animals.
- There was strong support for the use of species assessment systems when developing the list. In particular, Schuppli, Fraser and Bacon (2014) and the questions (however not the weighting) set out in Warwick et al. (2013) Assigning Degrees of Ease or Difficulty for Pet Animal Maintenance: The EMODE System Concept

