

BVA policy position on non-traditional companion animals

Introduction

1. This document sets out our position on non-traditional companion animals (NTCAs). For the purposes of this position NTCAs refers to all sentient companion animals that are not traditionally kept in the UK, including fish. The term excludes domestic cats, domestic dogs, domesticated equids, rabbits and species that are typically farmed.
2. The UK Animal Welfare Acts require all animal keepers and owners to 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.
3. To have a Good Life^{1,2} all animals must have the opportunity to have positive experiences, and throughout the duration of an animal's life, positive experiences should outweigh negative experiences.
4. NTCAs can have exacting husbandry requirements, and complex social, cognitive, and nutritional needs, which may make them more challenging to keep as pets. There are some species whose five welfare needs are so specialised they can rarely be met in a domestic environment.

Current UK legislation

5. At present there is fragmented legislation which only covers the keeping, breeding, and sale of NTCAs, including the Animal Welfare Acts, the Dangerous Wild Animals Act, the Animal Welfare (Licensing of Activities Involving Animals) Regulations, amongst others. Appendix 1 summarises current UK legislation by activity and species covered.

Welfare of NTCAs

Welfare assessment

6. Animal welfare relates to an animal's physical health and mental wellbeing. The World Organisation for Animal Health (WOAH) defines animal welfare as 'the physical and mental state of an animal in relation to the conditions in which it lives and dies.'³ Enhancing, protecting

¹ 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).

² Webster, J. (2016). Animal Welfare: Freedoms, Dominions and "A Life Worth Living." *Animals*, 6(6), 35; <https://doi.org/10.3390/ani6060035> (accessed 09Aug2021).

³ <https://www.woah.org/en/what-we-do/animal-health-and-welfare/animal-welfare>

and securing the health and welfare of animals is the fundamental purpose of the veterinary profession.

7. Historically, animal welfare assessment and management has centred on identifying and minimising negative effects on animal welfare. More recently, animal welfare science has shifted towards models that strive not only to minimise negative welfare effects but also to maximise positive welfare effects. Such approaches recognise that animals used by humans should have, at least, 'a life worth living', with a focus on ensuring as many animals as possible have a 'good life'^{1,2}.
8. With developments in animal welfare science, we are now better able to characterise animal welfare, and frameworks for assessing and managing animal welfare have evolved. We support the Five Domains model for animal welfare assessment⁴, which differs from the Five Needs (as required by law) by distinguishing between the physical and functional factors that influence an animal's welfare and the overall mental/emotional or affective state of the animal arising from these factors.⁵
9. To protect, advocate and enhance the welfare of NTCAs, the Five Domains model should be applied, such that behaviour is assessed as both a welfare indicator and welfare determinant, recognising that the affective state is not always easy to assess in some species.

Welfare provision

10. NTCAs can have exacting husbandry requirements, and complex social, cognitive, and nutritional needs. There are some very knowledgeable and experienced keepers in the UK with a breadth of expertise and it is entirely possible for private keepers to meet the needs of some of the more commonly seen NTCAs. However, there are some NTCAs whose needs are so specialised they can rarely be met in a domestic environment. In particular, primates are long-lived, intelligent, socially-complex animals and must be kept in social groups⁶, and many species of parrots need to flock and interact with conspecifics.⁷ A BVA/BVZS survey of vets seeing primates found that only 27 of 106 saw any of their pet primate owners in a given year, and only 9 saw more than half of their primate owning clients in a given year, raising serious concerns for the current health and welfare of primates currently kept as pets in the UK.⁸
11. Our 2022 Voice of the Veterinary Profession survey found that over eight in ten vets (81%) were concerned that the welfare needs of NTCAs were not being met, with the most cited welfare issues being 'irresponsible animal ownership' (82%), 'irresponsible breeding or sourcing' (11%), and 'lack of specialist veterinary care' (10%). Vets who treat NTCAs report that over half (58%) of the NTCAs they see do not have their five animal welfare needs met.⁹ This is up from just under half (47%) in Autumn 2019. Of those, around nine in ten (92%) said that the 'need for a suitable environment' was often not being met and over four in five (85%) felt that a suitable diet was often not provided. There has been a significant increase since Autumn 2019 in the number of vets reporting that NTCAs are often not protected from pain, suffering injury and disease (up from 46% to 62% of vets who feel more than half of the NTCAs they see are not having their needs met).

⁴ <https://www.mdpi.com/2076-2615/10/10/1870>

⁵ <https://www.bva.co.uk/media/4273/full-bva-position-on-animal-welfare.pdf>

⁶ <https://www.bva.co.uk/take-action/our-policies/primates-as-pets/>

⁷ The welfare and suitability of parrots as companion animals: a review. M Engebretson Animal Welfare 2006, 15: 263-276 <https://www.avianwelfare.org/issues/WelfareAndSuitabilityOfExoticBirds-1.pdf>

⁸ Pizzi, R, Mullineaux, E, Patterson, S 2022, ASSESSING VETERINARY CAPACITY FOR THE INSPECTION OF PET PRIMATES: A BVZS AND BVA SURVEY IN 2022; BVZS annual conference, 4-5 November 2022, Ashton

⁹ BVA Voice of the Veterinary Profession survey 2022

12. The absence of scientific evidence on how to meet the welfare requirements of some species hampers the provision of comprehensive pre-purchase guidance and brings challenges for veterinary professionals when advising clients, although non-published literature may be available. The Pet-Know-How Initiative, developed jointly by The Pet Charity, The British Small Animal Veterinary Association (BSAVA), The British Veterinary Zoological Society (BVZS) and the Companion Animal Sector Council (CASC), has a key role to play in promoting the importance of pre-purchase knowledge, through the provision of trusted advice and a series of interactive tests for prospective owners.¹⁰
13. In common with all species, before purchasing an NTCA, prospective owners should always check local veterinary provision and make sure that there is a veterinary practice that is able to provide care for their chosen species. There is also an owner responsibility to inform themselves of the limitations of access to veterinary care, as well as cost. Whilst vets must take steps to provide emergency first aid and pain relief, it is contingent on animal owners to consider their individual circumstances, particularly in relation to out-of-hours access to veterinary services and take steps to mitigate against issues which could reasonably be foreseen.
14. Morphs, which can exist across a range of NTCA species and are typically defined as exhibiting a desirable and reproducible colour or pattern mutation, can pose unique husbandry and management challenges and exploration of the detail is beyond the scope of this position. As some morphs come with particular health issues (eg enigma and spider morphs of corn snakes) most general practice vets would not feel competent to offer pre-purchase advice. Prospective owners should seek advice from appropriately qualified and/or experienced NTCA vets.

Regulation of the keeping of NTCAs

15. NTCAs should only be kept if there is a high expectation that the Five Domains can be met and that they will have a Good Life. At present there is minimal restriction on the keeping of NTCAs in the UK, unless Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) listed. Members of the public are permitted to keep any NTCA that is not listed in the Dangerous Wild Animals (DWA) Act.¹¹ Although owners are required to comply with the UK Animal Welfare Acts and meet the five welfare needs of the animals in their care, there is no oversight or verification after the point of sale unless a welfare concern is raised against the keeper with the relevant authorities.
16. Given the shortfalls in existing legislation, and the husbandry and welfare problems seen by veterinary professionals, there is clearly a need to improve the regulation of the keeping and sale of NTCAs.
17. Some restriction through legislation is needed but there is much debate around how this should be approached, with options including positive lists¹², negative lists¹³, or traffic light systems¹⁴, all of which have advantages and disadvantages.

¹⁰ <https://petportal.org.uk/>

¹¹ <https://www.legislation.gov.uk/ukpga/1976/38>

¹² A list categorising species allowed to be kept as companion animals by private individuals

¹³ A list categorising species prohibited from being as companion animals by private individuals

¹⁴ A list categorising species as red, amber, or green depending on the extent to which they are allowed to be kept as companion animals by private individuals

Negative lists

18. According to a review by Toland et al. (2020)¹⁵ of the different international regulatory frameworks for the keeping and sale of NTCAs, globally there is a predominance of approaches based around negative lists. The review also found a number of disadvantages with the negative list/prohibition approach, including:
- Authorities forced to be reactive as new species come into trade or problems are identified. Burden of proof is on individual scientists, humane and other groups, societies, or governments.
 - No evidence base to show that species excluded from the negative list are suitable pets, in terms of both animal health and welfare, and also the safety of people and the environment.
 - Administrative complexity and difficulty for enforcers.
19. In Norway, legislation previously prohibited the trading and keeping of NTCAs on animal welfare grounds. Despite the ban, it was reported that importation, trading, and keeping of amphibians and reptiles persisted on a substantial scale.

Positive lists

20. Positive lists (a list of permitted species) are currently employed in six European countries: Belgium¹⁶, Luxembourg, Norway, The Netherlands, Malta, and Croatia. The Federation of Veterinarians of Europe (FVE) supports the positive list approach:

“FVE calls for competent authorities to work on the establishment of lists of animals, based on a thorough assessment, according to certain scientific criteria, of the risks for the animal itself, its owners and the society, the indigenous species and ecosystems. Animals shall be approved for keeping by private individuals on the basis of their listing.”¹⁷

21. In 2016 Eurogroup carried out an impact assessment following the implementation of the positive list approach in Belgium, finding that it had reduced exotic mammal trade overall, and online trade in prohibited species was minimal, when compared to other European countries.¹⁸
22. However, according to The Scottish Animal Welfare Commission (SAWC)’s interim report on exotic pets (2021) the European College of Zoological Medicine has expressed reservations as to the ability of positive lists to provide sufficient protection for animals included on the list:

“In our opinion, the term positive list is often interpreted as a list of species that are ‘easy to keep’ in comparison to more difficult ones. However, from the point of view of welfare, such ‘easy to keep species’ still require species-specific husbandry and nutrition, and failure to do so will result in health and welfare problems (Rooney, EJ et al. 2014, Green, Coulthard et al. 2020) Most species listed on positive lists are widely available and they could end up in the hands of inexperienced keepers with limited knowledge of these species’ requirements, with a significant amount of

¹⁵ Toland, Elaine, Monica Bando, Michèle Hamers, Vanessa Cadenas, Rob Laidlaw, Albert Martínez-Silvestre, and Paul van der Wielen. 2020. "Turning Negatives into Positives for Pet Trading and Keeping: A Review of Positive Lists" *Animals* 10, no. 12: 2371. <https://doi.org/10.3390/ani10122371> <https://www.mdpi.com/2076-2615/10/12/2371/html>

¹⁶ In June 2008 the European Court of Justice ruled that the Belgian positive list was not in violation of EU free trade regulations as long as it was based on objective and non-discriminatory criteria and a procedure was in place for parties to request the inclusion of species on the list (Andibel ruling).

¹⁷ https://www.fve.org/cms/wp-content/uploads/006_fve_position_on_positive_lists_of_exotic_species_final.pdf

¹⁸ <https://www.eurogroupforanimals.org/files/eurogroupforanimals/2021-08/EfA%20Report%20Positive%20List%20Belgium%202016.pdf>

*avoidable health problems observed in these species” going on to conclude that “further regulation would be beneficial.”*¹⁹

23. The interim conclusion of SAWC suggested that “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.” However, the final report concluded that “a single list of permitted species (the listing of only those species which can be legally kept as pets, with all others being prohibited unless an individual licence has been obtained by specialist keepers), while being less nuanced than a traffic-light system given the very large numbers of species involved, has the advantage of clarity and would be easier to enforce.”²⁰

A tiered (traffic light) approach

24. We strongly support further regulation of the keeping of NTCAs to ensure that only species where there is a high expectation that the Five Domains can be met and that they will have a Good Life are permitted to be kept within domestic settings. This could be achieved through a traffic light system or multi-tier licensing system. However, any system should be clear that NTCAs listed in the ‘green’ category or equivalent should not be considered easy to keep, and that a tiered approach does not tacitly support a tiered approach to welfare.
25. Species selection for any such multi-tier licensing system must be evidence-based, use species-specific assessment systems, be conducted by an independent body, and have specified review periods to keep the list up to date and consider whether species should be added, moved or removed. There should also be a mechanism for granting exemptions for those individuals who can demonstrate they have a standard of expertise, appropriate facilities, and husbandry regimes to provide a Good Life for animals not permitted within the multi-tiered approach.
26. Prior to purchase, keepers should be required to pass a pre-purchase knowledge test to demonstrate they have understood the necessary provisions to support and maintain the welfare needs of their chosen species. Pre-purchase knowledge tests should be developed with input from the veterinary profession and industry (eg the Pet Know-How Initiative), be evidence-based, and proportionate.
27. If increased regulation was to be introduced, careful consideration would need to be given to the potential unintended consequences including driving ownership and trade of particular species underground, owners not seeking veterinary care for fear of reprisal, and the veterinary profession being explicitly or tacitly required to police new regulations. Consideration would also need to be given to the future of existing animals, their traceability, and the role of grandfather rights, particularly for long-lived species.
- **Recommendation 1:** A regulatory regime (ie multi-tier licensing or equivalent) for the keeping of NTCAs should be developed by an independent body, be evidence-led, and be underpinned by a transparent review process.
 - **Recommendation 2:** Keepers should be required to pass a pre-purchase knowledge test which is evidence-based and proportionate (eg Pet Know-How Initiative) and show evidence of completion to the vendor at the point of sale.

¹⁹ <https://www.gov.scot/publications/scottish-animal-welfare-commission-interim-report-exotic-pets-scotland/pages/8/>

²⁰ <https://www.gov.scot/publications/final-report-exotic-pet-working-group-scottish-animal-welfare-commission/pages/5/>

- **Recommendation 3:** Transitional arrangements for currently kept NTCAs should form part of any regulatory regime, with euthanasia recognised as an appropriate option in cases where the application of ‘grandfather rights’ would mean continued poor welfare.

Regulation of the sale of NTCAs

28. Pet vendors (anyone undertaking the activity with the aim of making a profit or generating a fee, including internet sales) must be licensed and meet the specific conditions set out in The Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018²¹, The Animal Welfare (Licensing of Activities Involving Animals) (Wales) Regulations 2021²², or The Animal Welfare (Licensing of Activities Involving Animals) (Scotland) Regulations 2021.²³
29. Although pet vendors are required to provide prospective owners with information on how to care for their animal at point of sale, it is unclear how consistently this is applied. Until the launch of the Pet Know-How Initiative there has been no mechanism in place to assess whether prospective owners will be able to meet the welfare needs and husbandry requirements of their chosen pet. In Northern Ireland, pet shops require a licence under the Petshops Regulations (Northern Ireland) 2000²⁴, which have significantly less detailed licensing conditions, and no species-specific guidance.
30. In England, the statutory guidance for local authority inspectors, intended to be read alongside the Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018 requires that enclosures must be appropriate to the size of the species. However, the guidance goes on to state that “Whilst animals are offered for sale, the business is considered a short-term transitional holding facility. Because of this, it may be acceptable to have enclosures of smaller sizes than those intended for long term care.” The guidance defines transitional as not longer than three months, at which point the animal must be moved to an enclosure that at least meets the higher standard. The sizes are outlined for each taxonomic group within the individual schedules and for snakes the minimum enclosure size is listed as not less than two-thirds length.²⁵ Note that in Wales the Guidance notes for conditions for Selling Animals as Pets, to be read in conjunction with The Animal Welfare (Licensing of Activities Involving Animals) (Wales) Regulation 2021²⁶ require snake vivaria to be at least the length of the snake²⁷. The Federation of British Herpetologists code of practice for recommended minimum enclosure sizes for reptiles also states that one dimension inside the enclosure should be at least as long as the snake.²⁸
31. We are concerned that displaying animals in enclosures intended for transitional holding will normalise such standards in public perception and contribute to temporary welfare compromises becoming accepted and perpetuated by owners. While we recognise that it may not always be practical for vendors to display animals in environments which meet all of the higher standards within the guidance, vendors should role model conditions that are conducive

²¹ <https://www.legislation.gov.uk/ukSI/2018/486/contents/made>

²² <https://www.legislation.gov.uk/wsi/2021/416/contents/made>

²³ <https://www.legislation.gov.uk/ssi/2021/84/contents/made>

²⁴ <https://www.legislation.gov.uk/nisr/2000/405/contents/made>

²⁵ <https://www.gov.uk/government/publications/animal-activities-licensing-guidance-for-local-authorities/selling-animals-as-pets-licensing-statutory-guidance-for-local-authorities--2#higher-standards>

²⁶ <https://www.legislation.gov.uk/wsi/2021/416/regulation/1/made#regulation-1-2>

²⁷ <https://gov.wales/sites/default/files/publications/2021-10/the-animal-welfare-licensing-of-activities-involving-animals-wales-regulation-2021-guidance.pdf>

²⁸ <https://www.thefbh.org/news>

to positive welfare. Where transitional enclosure sizes are used, vendors should be clear that such standards are not suitable for a permanent environment.

32. This two-tier approach to welfare provision for vending is potentially confusing and is likely to add an unnecessary layer of complexity to inspection and compliance. 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. As the process for arriving at the transitional enclosure sizes was not transparent and it is unclear on what evidence the guidance was produced, we are concerned that the guidance could not only be resulting in welfare harms for the period during which animals are available for sale, but could also be used as defence for lower welfare standards in private settings. It would be preferable to see guidance which required consistent enclosure sizes across all licensable activities, as is the case in Scotland's guidance.
- **Recommendation 4:** Northern Ireland regulations should be brought in-line with the more detailed animal activities licensing required in the rest of the UK.
 - **Recommendation 5:** Licensing conditions and statutory guidance for pet vending should be consistent across the UK with a single system of detailed minimum standards.
 - **Recommendation 6:** Minimum enclosure sizes should be consistent across all licensable activities.
 - **Recommendation 7:** Minimum standards must be evidence-based, and developed by an independent body, including veterinary input and scrutiny. As part of this, the maximum acceptable duration of transitional holding should be reviewed.
 - **Recommendation 8:** Where two-tier systems currently exist and pet vendors choose to take advantage of the lower requirement, they should be required to display clear signage to show prospective owners that the minimum standards are not suitable for permanent housing.
 - **Recommendation 9:** Government should establish 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.
 - **Recommendation 10:** There should be appropriate training in animal welfare and animal welfare assessment for all local authority officers responsible for conducting inspections of pet vending establishments (and licensable animal activities more widely), tailored to the species being inspected.

Online sale of NTCAs

33. 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 health and welfare, public health and safety issues, and negative environmental and conservation impact. Buyers may purchase animals without understanding their species-specific welfare needs, or any associated statutory responsibilities.
34. In the report *One Click Away: An investigation into the online sale of exotic animals as pets*, 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.²⁹

35. The promotion and sale 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 not well monitored, and may also be 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.
36. Under the England, Wales and Scotland Animal Activities Licensing regulations 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
 - display the age of the animal being advertised (except in the case of fish)
 - state the country of residence of the animal from which it is being sold, and
 - state the country of origin of the animal.
37. Since September 2021, under the Animal Activities Licensing (Scotland) Regulations, local authorities have been required to publish a register of licences that is publicly accessible. This may enable websites and buyers to check the legitimacy of the seller.
38. The Pet Advertising Advisory Group (PAAG) has created a set of minimum standards for classified advertising websites, including health and welfare requirements, which we strongly support.³⁰ 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 'blacklisted' words, lists of NTCA species that require a licence or a CITES certificate, and NTCAs which have welfare needs so specialised they should not be advertised for general sale.
39. PAAG fulfils an important function in that it encourages sites to compete with each other on offering better welfare as a unique selling point (USP). This then helps to corral those trading on lower welfare into a place where they can be monitored, although paradoxically and problematically, if sellers are pushed off a particular site as a result of raised standards, their move to a different site increases the activity on that site, pushing it up the search rankings and raising its profile.
40. Data are an important asset for tackling irresponsible pet sales, being helpful not only to look at trends (eg prices, reasons for abandonment, popularity of species) and for horizon-scanning but also for use reactively to contribute to a 'sting' of a particular activity by agencies such as HMRC. Data gathering and analysis can be useful at a macro or micro level, and include both text and photo analysis.
41. We welcome initiatives such as Tech4Pets³¹ which use technology and Open-Source Intelligence techniques to monitor online pet sales and dismantle pet trafficking networks through the analysis of data. Such initiatives can also help assess effectiveness of disruptors by monitoring data shifts when interventions are trialled.

²⁹ <https://www.bluecross.org.uk/one-click-away-investigation-online-sale-exotic-animals-pets>

³⁰ <https://paag.org.uk/minimum-standards/>

³¹ <https://www.linkedin.com/company/tech4pets>

42. We are concerned regarding the shipping of live NTCAs by online retailers. Although covered by animal transport regulations, there is no enforcement, with online fish suppliers in particular using Royal Mail and other couriers, even where this is specifically prohibited by those services. It is essential that live fish are packed in a manner similar to The International Air Transport Association (IATA) or The Ornamental Aquatic Trade Association (OATA) Regulations to ensure their survival following shipping, and appropriate instructions for unpacking and acclimating fish following shipping should be provided to customers.
- **Recommendation 11:** There should be further regulation of online sales, and in particular advertising on third party sites. PAAG Minimum Standards should be adopted by Government as a basis for regulation of the sector.
 - **Recommendation 12:** Any person selling any animal should have to register to do so with their Local Authority and display their registration number in all advertising material.
 - **Recommendation 13:** 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.
 - **Recommendation 14:** The effectiveness of online disruptors in influencing purchaser behaviour should be explored to foster responsible purchasing online.
 - **Recommendation 15:** The conditions for transportation of live animals must be optimal, using approved carriers, and with due consideration given to minimising stress and subsequent susceptibility to disease following transportation.

Rehoming of NTCAs

43. 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. The regulations mean that any operator in Scotland who supplies five animals as pets in a single movement or five animals cumulatively over the course of a 12-month period, including animals originating within and outside Scotland, must be licensed.
44. Many of the challenges associated with the lack of regulation of rehoming activities and sanctuaries in England, Wales, and Northern Ireland are not unique to NTCAs and will apply equally to other companion animals. However, some of these may be more pronounced in the context of the more exacting husbandry needs of NTCAs such as:
- Potential for inappropriate housing, inadequate nutrition, poor hygiene, and poor biosecurity.
 - Overcrowding of animals.
 - Inadequate financial support or means for the number of animals kept, which can impact on housing, nutrition, and access to veterinary care (including provision of appropriate preventive care prior to rehoming).
 - Inappropriate proximity of predator and prey species.
 - Inappropriate mixing of animals prior to disease screening, and lack of appropriate quarantine periods.
 - Lack of provision for addressing complex behavioural, social, and health needs, making successful rehoming more challenging.
 - No clear demarcation of when a rehoming centre becomes a long-term sanctuary. Few

centres have proper long-term facilities (eg which meet the Global Federation of Animal Sanctuaries [GFAS] standard³²) so animals may be kept in temporary accommodation for long periods.

- Poor information and guidance for new owners prior to rehoming.
 - Unwillingness to recognise euthanasia as the best option for some health and behavioural problems, and a welfare neutral option in the event that rehoming to an appropriate owner is not possible.
- **Recommendation 16:** There should be UK-wide regulation across all pet vendors, with clear definitions and a consistent approach such that rehoming centres, rescues, and sanctuaries are required to meet baseline standards.

Dangerous Wild Animals Act

45. The Dangerous Wild Animals (DWA) Act was introduced to protect public safety through the regulation of the keeping of dangerous wild animals. Anybody intending to keep an animal listed in the Act must apply for a licence from the local authority. To grant a 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—
 - (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
 - (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.

46. The species included in the DWA 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.³³ 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, 8 tigers, 11 leopards, 18 pumas, 10 cheetahs, 2 tigers and one jaguar)
- 274 primates (including over 150 lemurs)
- 158 crocodilians
- 508 venomous snakes (including 57 diamondback rattlesnakes)
- 332 scorpions
- 106 venomous lizards
- 2 elephants

³² <https://www.sanctuaryfederation.org/accreditation/standards/>

³³ <https://www.bornfree.org.uk/dwamap>

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 DWA Act

47. The DWA Act, even when applied in conjunction with other legislation (eg UK Animal Welfare Acts), is inadequate. The emphasis of the Act is on public safety, with specific references to welfare limited to ensuring suitable accommodation, environment, food and water only. The five welfare needs, or better the Five Domains, are applicable to all kept animals and should be applied consistently regardless of the status of the collection and by which piece of legislation that collection is regulated. The Dangerous Wild Animals (Northern Ireland) Order 2004 aims to combine public safety and animal welfare and is therefore a potentially useful model.³⁴

48. Shortfalls in the legislation include:

- No minimum welfare standards that licensees must meet. Notwithstanding the fact that anecdotally many DWA license holders are extremely competent, knowledgeable, and provide husbandry and keeping conditions which may be comparable to those provided in zoos, there is need for mitigation through effective enforcement of the Animal Welfare Acts and/or reference to the Secretary of State's Standards for Modern Zoo Practice in the legislation.
- No recognition of positive welfare states.
- No central register of animals currently kept under DWA licence so it is difficult to be certain exactly how many dangerous wild animals are being kept or to understand enforcement data across local authorities.
- Although the keeper of a dangerous wild animal must have a licence, it is not an offence to transport a dangerous wild animal without a licence on behalf of someone else. This means that no DWA licence is required when transporting animals into the UK, making these animals untraceable once they have entered the country.
- Pet shops are exempt from the DWA Act.
- Licences for individual owners can be awarded retrospectively, to avoid the need for a local authority to seize animals already being kept by the applicant.
- There is variable distribution of ownership of the licensing function across local authorities. There is a variable approach to follow-up, data collection and enforcement, and no resource for prosecution. The limited power of local authorities means that a magistrate is required to remove a licence.

Role of vets

49. 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 often used for subsequent inspections, but it can be a non-vet as long as they are deemed competent (eg a licensing officer from the local authority). 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.

50. At present local authorities vary in their approach to DWA inspections and any veterinary surgeon can be approached by a local authority to carry out an inspection. There is a need for a consistent approach using suitably qualified and experienced vets.

³⁴ <https://www.legislation.gov.uk/nisi/2004/1993/contents/made>

51. Veterinary inspection as part of the DWA licence application could benefit from an outcomes approach to welfare, which would allow some flexibility and the application of professional judgement on the part of the inspecting vet. Although this would mean that training of inspectors would need to be extremely thorough and species-specific, the costs associated with such training could be passed on to applicants and could serve to deter more casual interest in keeping dangerous wild animals.
52. Veterinary capacity to complete appropriate training and carry out inspections must be a consideration, which may be better served by a prescriptive approach to mitigate against inconsistency as well as potential difficulties taking enforcement action where guidance is open to interpretation.
53. In either case, inspection, both initial and repeat/ongoing should be carried out by a vet with the appropriate additional species-specific training rather than an 'authorised person'.
54. We recognise that as we are calling for improved regulation of the keeping of NTCAs, such a regime would likely supersede the Act. However, while the Act remains in force, we consider that the UK Governments should implement the following recommendations to safeguard animal welfare and public safety:
 - **Recommendation 17:** Licence applicants/holders should be required to meet a set of minimum standards, mirroring those required for zoos. These DWA standards should cover human safety, animal welfare, behavioural needs, and preventative veterinary health programmes with mandated veterinary visits. Euthanasia of the animal(s) should be seen as an appropriate solution to non-compliance by a keeper.
 - **Recommendation 18:** Suitably competent and experience vets should be supported to inspect with appropriate training and clear guidance/templates.
 - **Recommendation 19:** Further consideration is needed as to whether the classification of hazardous animals as listed for the purposes of zoo licensing could reasonably replace the current DWA Act list. If so, consideration should also be given as to whether inspections of some species could be carried out by non-vets who are appropriately trained.
 - **Recommendation 20:** In the short-term, there should be a review of species on the DWA Act schedule. This should be conducted by an independent group and be based on scientific evidence. Species selection criteria should include animal welfare, as well as public safety.

Responsible breeding of NTCAs

55. Where captive-breeding is carried out, it should be carried out responsibly, sustainably (not using wild-caught animals unless for limited purposes such as conservation or genetic diversity) and without negatively impacting on animal health and welfare (eg selective breeding for phenotypic variants [morphs], causing genetic disorders).
56. Breeders should not knowingly select for conformation, colours, and traits which cause health and welfare harms. The poor conformation seen in some cats and dogs should act as a warning of what could occur in NTCAs if breeding for appearance instead of welfare is allowed to continue and grow. Selective breeding for traits which would not survive through natural selection should not occur, and curiosity-led breeding based on aesthetics where there is potential for welfare harms should not be supported.
57. Our existing position on extreme conformation sets out a number of recommendations which

could reasonably, in part or in full, apply to the breeding of NTCAs.³⁵ We consider that:

- Animals showing traits or extremes of conformation that negatively affect their health and welfare should not be used for breeding.
- Breeders should comply with current animal welfare legislation when undertaking breeding decisions and consult with an appropriate veterinary surgeon to enable informed decisions as to whether certain animals can be responsibly bred to confer healthy conformational traits.
- Prospective owners and keepers should speak to a vet regarding the health and welfare problems associated with certain breed-types prior to purchase.
- The use of images or videos of NTCAs with extreme conformation in advertising and marketing materials should be avoided so as to encourage responsible ownership and avoid the normalisation of poor health amongst these animals. Veterinary practices, marketers and designers should consult the BVA good practice guidance for the responsible use of pet animals in advertising before commissioning and using animals in marketing materials or consult with their local vet.³⁶
- Research should be carried out to better understand the social influences that drive breed demand in order to develop targeted educational strategies that will influence purchasing behaviours and breeding/production drivers.

Species-specific breeding concerns

58. The captive breeding of exotic birds, in particular hand-rearing, can lead to welfare harms. We do not support isolation rearing and sensory overload techniques. Hand-rearing can also lead to sexually bonded birds, which then leads to behavioural issues. Whilst there may be some instances where hand-rearing is unavoidable (eg death or injury of the parent bird, or conservation reasons), it is often extremely difficult to do so without creating psychological issues. Legitimate exceptions should not be allowed to create loopholes or justification for welfare harms.
59. We also have concerns regarding hybrid cats, including risks associated with mating and the welfare of servals kept in captivity for the purpose. Serval and domestic cat matings produce F1 hybrids that have low viability due to genetic incompatibility. More frequent matings are needed to attain conception, resulting in adverse welfare, particularly for females used to produce F1 offspring. We see no need to be producing F1 hybrids when there is already a population of hybrid cats. Given that even F5 and F6 hybrid cats are highly demanding and complex animals, it is difficult to meet the welfare needs of hybrid cats in a domestic environment

International trade

60. All live vertebrate animals transported in connection with an economic activity are protected by retained EU legislation EC 1/2005 on welfare during transport.³⁷ This legislation does not include specific detail on the welfare requirements for the transportation of non-traditional companion animals or wildlife, although ensuring adequate welfare remains a legal obligation of the transporter.
61. The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) is an international agreement between governments. Its aim is to try to ensure that

³⁵ <https://www.bva.co.uk/take-action/our-policies/extreme-conformation/>

³⁶ https://www.bva.co.uk/media/2971/bva_pets_in_advertising_2018.pdf

³⁷ <https://www.legislation.gov.uk/eur/2005/1>

international trade in specimens of wild animals and plants does not threaten the survival of the species. CITES works by subjecting international trade in specimens of selected species to certain controls. All import, export, re-export and introduction from the sea of species covered by the Convention has to be authorized through a licensing system.

62. The species covered by CITES are listed in three Appendices³⁸, according to the degree of protection they need. Roughly 5,950 species of animals are listed on the CITES Appendices:

- Appendix I includes species threatened with extinction. Trade in specimens of these species is permitted only in exceptional circumstances.
- Appendix II includes species not necessarily threatened with extinction, but in which trade must be controlled in order to avoid utilization incompatible with their survival.
- Appendix III includes species that are protected in at least one country, which has asked other CITES Parties for assistance in controlling the trade.

63. All CITES permits require live animals to be prepared and shipped to minimize any risk of injury, damage to health or cruel treatment. The Animal and Plant Health Agency (APHA) is the UK CITES Management Authority and those wishing to import CITES species must apply to APHA for a permit. The application is then assessed by the Joint Nature Conservation Committee (JNCC) for animals.

64. For species not covered by CITES, depending on the country of origin, exporters and importers must comply with the following rules:

- Importing live animals and germinal products to Great Britain under Balai rules
- Importing live animals, animal products and high-risk food and feed not of animal origin from non-EU countries to Great Britain³⁹
- Importing live animals and germinal products from the EU to Great Britain⁴⁰

65. Importers of live animals from non-EU countries must have an import licence or authorisation and a health certificate, whereas importers of live animals from EU countries must provide a health certificate and may be asked to provide an import licence or authorisation.

66. IATA Live Animals Regulations (LAR) is the worldwide standard for transporting live animals by commercial airlines.⁴¹ The manuals are published annually to stay up-to-date with the latest regulations, standards and best practices. Although the LAR contains information on animal behaviour, stocking density, and handling, and IATA offers a general qualification in live animal transportation⁴² there is a gap for species-specific acceptance training and checklists.

67. OATA has their own transport code of conduct which members must adhere to.⁴³ The comprehensive code covers fitness to travel, preparation for transport, container specifications, documentation requirements, and extends beyond the duration of transport to receipt and unpacking.

³⁸ <https://cites.org/eng/app/index.php>

³⁹ Includes reptiles; amphibians (except salamanders); invertebrates (except bees, molluscs and crustaceans); captive-bred birds that are not pets, poultry or for research, display or conservation (for example, captive-bred birds imported commercially for sale in pet shops); non-domestic ungulates

⁴⁰ Includes reptiles; amphibians (except salamanders); invertebrates (except bees, molluscs and crustaceans); captive-bred birds that are not pets, poultry or for research, display or conservation (for example, captive-bred birds imported commercially for sale in pet shops); non-domestic ungulates

⁴¹ https://www.iata.org/en/publications/store/live-animals-regulations/?utm_source=google&utm_medium=cpc&utm_campaign=APCS-Publications-search-sitelinks&gclid=EAlaIQobChMI4bneh4Pq-gIVGO3tCh1KgAEHEAAYASABEgKX3fD_BwE

⁴² <https://www.iata.org/en/training/courses/live-animal-regulations/tcgp06/en/>

⁴³ <https://ornamentalfish.org/wp-content/uploads/Transport-code-final.pdf>

68. We consider that all commercial importers of 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 commercial movements regardless of method of transport. 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. Standards set out in legislation for the welfare of livestock during transport could act as a useful model. Welfare standards should apply at each stage of an animal's journey, including the time spent in holding centres or at rest points, and there should be a shared responsibility between exporter and importer for ensuring standards are met.

- **Recommendation 21:** Industry should develop a transport kitemark to provide assurances that welfare standards have been met throughout the journey.
- **Recommendation 22:** Exporters and importers should work together to ensure pre-notification and advance checking of paperwork, and carriers should have in place robust acceptance procedures which are properly enforced.

Sustainability

69. Consideration must be given to the wider impact of keeping NTCAs on wild populations and conservation (including the impact of wild-capture and release/escape of non-native species), public safety, and human and environmental health.

Wild-capture

70. The existing BVA and BVZS position statement on the importation of wild reptiles and amphibians into the EU for the pet trade raises concerns about the impact of the worldwide trade in wild-caught reptiles and amphibians on animal welfare.⁴⁴ In particular:

- The welfare of the animals in captivity and during transportation
- The impact on the health of native species and ecosystems if they escape (spread of disease, predation etc)
- Unsustainable harvest of wild amphibians and reptiles

71. The position proposes that the key concerns could be mitigated by:

- The European Union taking a lead by banning the import into the EU of wild-caught reptiles and amphibians intended to be sold as pets
- Preventing any illegal trade through robust enforcement of current legislation, including animal welfare legislation
- Meeting the legitimate demand for these species as private pets using captive-bred stock available within the EU
- Introducing a caveat to allow certain wild-caught species to be taken into captivity by zoos or authenticated specialist private breeders for purposes of conservation – when justified
- The Royal College of Veterinary Surgeons (RCVS) and European Association of Establishments for Veterinary Education (EAEVE) requiring effective teaching of exotic animal medicine and welfare in all EU veterinary universities
- Encouraging the UK pet industry to provide effective and consistent welfare and husbandry advice at point of sale.

⁴⁴ <https://www.bva.co.uk/media/3126/bva-and-bvzs-statement-on-import-of-wild-caught-amphibians-and-reptiles-october-2013.pdf>

72. We do not support wild-capture for the pet trade. However, we also recognise that wild-capture can play a role in sustaining local economies and provide important benefits to the communities in the country of origin.
73. It has been reported by a trade association that 77% of UK pet fish are freshwater species, with only 5% of freshwater fish collected from the wild.⁴⁵ Marine fish are generally collected from the wild in smaller volumes as the market is much smaller, with the industry considered 'high value, low volume'. It has been recognised that wild fish capture plays an important role in conservation, with communities that catch fish understanding the need to conserve their environment to ensure longevity of supply and therefore income.⁴⁶
74. Although we recognise that the welfare and ethical considerations which inform our position of calling for a ban on the wild-capture of reptiles and amphibians can be applied to fish, we do not consider that there is currently sufficient evidence to call for an outright ban on the wild-capture of fish.
75. Instead, we hold the aspirational and ultimate aim of a reduced reliance on wild-capture of fish, with improved welfare outcomes-focused regulation of wild-capture, and consistent education and enforcement prioritised in the short to medium term. Welfare improvements should include a review of maximum transport times, appropriate enrichment at all stages of the process unless evidence shows that this is adversely affecting welfare, independent audit of the sector, and the development of a kitemark to support sustainable and welfare friendly consumer choice. We would also like to see further research into the welfare impacts and environmental advantages and disadvantages of the wild-capture of fish to help inform future reviews of our compromise position.
76. We would welcome further moves towards the development of high-welfare captive-breeding programmes for fish, supported by the further development of operational welfare indicators. Although captive-breeding is not without its welfare challenges and does not represent a panacea, techniques are improving and the invaluable expertise of fish vets from around the world should be drawn on to further refine approaches. So called "tank-buster" species, namely those that grow too big for the average domestic aquarium (eg Black Pacu), whether wild-caught or captive-bred, should not be sold unless to specialist keepers with adequate facilities.
- **Recommendation 23:** There should be an end to the import of wild-caught reptiles and amphibians for non-conservation reasons.
 - **Recommendation 24:** Prospective owners should be able to verify the provenance of NTCAs prior to purchase and encouraged to purchase from UK-based responsible breeders (eg assured breeder scheme for NTCAs captive-bred in the UK).
 - **Recommendation 25:** Ultimately there should be a move away from the wild-capture of fish, alongside the further development of high-welfare captive-breeding programmes for those species of fish whose welfare needs can be met in the domestic environment.
 - **Recommendation 26:** There should be improved regulation and traceability of the wild-caught fish trade, with a welfare-outcomes focus and supported by independent audit.

⁴⁵ <https://ornamentalfish.org/wp-content/uploads/Fishing-for-facts-report-ONLINE-SPREADS.pdf>

⁴⁶ Watson I and Roberts D (2015) Literature Review: the benefits of wild caught ornamental aquatic organisms. *Report by Durrell Institute of Conservation and Ecology to the Ornamental Aquatic Trade Association*. <https://ornamentalfish.org/wp-content/uploads/Literature-Review-The-Benefits-of-Wild-Caught-Ornamental-Aquatic-Organisms.pdf>

- **Recommendation 27:** There should be further research into the welfare impacts of capture, transport, housing, adequate quarantine and the environmental advantages and disadvantages of the wild-capture of fish.

Animals bred for food of NTCAs

77. Many NTCAs are partly or exclusively carnivorous or insectivorous and therefore require food of animal origin to ensure optimal nutrition. The welfare benefits to the predator of live-feeding are considered by some to include behavioural enrichment whilst also providing essential nutrition in a 'near-natural' way.⁴⁷ Additional considerations relating to feed for carnivorous NTCAs include:

- Husbandry of feed species including access to food and water, behavioural opportunity, parasite control, etc
- Poor nutritional value of feed species, associated nutritional stress and disease of NTCA, and increased shedding of pathogens
- Poor prey selection by keeper – either wrong species or over-feeding of a particular species
- Hobby breeding of vertebrates by keepers of NTCAs for the purposes of food
- Welfare at slaughter
- Live-feeding resulting in a risk of injury to the NTCA and/or keeper

78. There are a number of public health risks associated with NTCA feed. With invertebrate feeding the public health risk comes from known and unknown pathogens in the production cycle of the insect, and in the case of live-feeding there is a risk of escape and infestation of the premises. Feeding of live vertebrate species can risk bites and scratches from handling, and exposure to faeces and urine. There is also a risk of Salmonella infection from handling raw or defrosting products. In 2021 there was a product recall of feeder mice produced and distributed by Monkfield Nutrition following the detection of Salmonella.⁴⁸ BVA and BSAVA supported the development of guidance for owners on mitigating the impact of the supply chain issue.⁴⁹ The Reptile and Exotic Pet Trade Association (REPTA) provide guidelines on storage, defrosting, and handling for reptile owners.⁵⁰

79. Live-feeding of vertebrates appears 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, although it may be that the provision of a refuge for the prey animal could help circumvent legislation, subject to all other welfare needs also being met. There is yet to be a test case.

80. We do not support live-feeding of vertebrates in any circumstance, and NTCAs which require live-feeding of vertebrates should not be kept in a domestic environment.

81. Understanding of invertebrate sentience is evolving and is more difficult to define than for vertebrates. Invertebrates also represent an enormous order of animals. Insecta and molluscs are the main taxonomic groups used as NTCA food, although blood worms, annelids, and Daphnia might also be used for some species, including fish. We consider that live-feeding of these groups is likely to be acceptable, but only when necessary. In all cases the welfare needs

⁴⁷ Cooper, J. E., & Williams, D. L. (2014). The feeding of live food to exotic pets: issues of welfare and ethics. *Journal of Exotic Pet Medicine*, 23(3), 244-249.

⁴⁸ <https://www.food.gov.uk/news-alerts/alert/fsa-prin-55-2021>

⁴⁹ https://casc.org.uk/documents/rodent-recall?fbclid=IwAR3plMKV-a7HqFfZ6tQZIOmaO_zAz4AnvpaCAGykriZk0Y0rF90hEnoHp6o

⁵⁰

https://3851531.app.netsuite.com/core/media/media.nl?id=2196062&c=3851531&h=DZXZN5hbz6kEB2SrfURemgBhck092m5Z2BhfCk5_IKqcs7Kz&xt=.pdf

of invertebrates should be met prior to feeding.

- **Recommendation 28:** NTCAs which require live-feeding of vertebrates should not be kept in a domestic environment.

The veterinary professions – education

Undergraduate teaching

82. The RCVS Day One Competences⁵¹ 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.
 83. Curricula and clinical teaching in NTCAs vary between vet schools. Some schools (eg Edinburgh and the Royal Veterinary College) have their own exotics department, service and clinical rotations, whilst others have no defined department, relying on external lecturers and students' exposure to NTCAs during Extra-Mural Studies placements. In some schools NTCA teaching is optional or provided in extracurricular activities (eg clinical clubs), as opposed to being built into the curriculum.
 84. The majority of graduates go into first opinion practice as a first step in their veterinary career, and it is important that they are able to handle NTCAs, conduct a clinical examination, and identify what is normal for that species. They should also be equipped to provide first aid, pain relief, and euthanasia to NTCA species and use the prescribing cascade due to the lack of authorised products for NTCAs. Recognising that there is already pressure on the veterinary undergraduate curriculum to cover a breadth of common species, 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).
 85. The value of peer-to-peer support in the practice setting should not be underestimated and the bond between first opinion practices and exotic referral practices should be facilitated and cultivated such that advice is readily accessible. Existing resources should be promoted and shared to support first opinion practitioners.
 86. RCVS recently updated the Day One Competences for Veterinary Nurses.⁵² The guidance is clear that Day One Competences gained in small animal should include dogs, cats, and exotic species, giving greater prominence to the importance of being able to confidently handle and assess a wider range of species. This is creating an imperative for teaching time to be allocated to a wide range of NTCAs, including practical experience.
- **Recommendation 29:** Vet schools and veterinary nursing colleges should continue to embed the teaching of basic care for NTCAs within their curricula.
 - **Recommendation 30:** At the time of graduation, all vets should be able to confidently handle the NTCA species most commonly seen in practice, advise on basic husbandry requirements,

⁵¹ <https://www.rcvs.org.uk/news-and-views/publications/rcvs-day-one-competences-feb-2022/>

⁵² <https://www.rcvs.org.uk/setting-standards/accrediting-primary-qualifications/accrediting-veterinary-nursing-qualifications/rcvs-day-one-competences-skills-and-professional-behaviours-for/part-a/rcvs-day-one-competences-for-veterinary-nurses/>

conduct a clinical examination, use the medicines Cascade appropriately, identify what is normal for the species, and provide first aid/pain relief and euthanasia.

- **Recommendation 31:** The veterinary associations should work together to develop a simple resource for general practice vets regarding the provision of first aid and euthanasia to NTCA species.

Post-graduate training, advanced practitioners and specialisation

87. RCVS recognised Advanced Practitioners have a key role to play in supporting the health and welfare of NTCAs in first opinion practice. With initial accreditation based on possession of an RCVS or other relevant postgraduate qualification, documented CPD, and being a current active practitioner within the selected field of designation, the Advanced Practitioner route should be promoted and championed to general practice vets with an interest in NTCAs.
88. 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 or by Meritorious Contributions to Learning (MCL) in a subject which is in, or relevant to, the specialty concerned; or
 - A postgraduate qualification, 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.
89. 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 a residency. There are very few residencies available in NTCA species, and although the American College of Zoological Medicine offers post-graduate qualifications which do not require residency, this appears to be the extent of the options.
 - The RCVS grants recognition as a European Veterinary Specialist in Zoological Medicine to those who have successfully passed Specialist Diplomate examinations, after undertaking a rigorous minimum 3-year period of training, supervised by a Specialist (ie. residency). However, for other disciplines there are well-structured training routes and alternative pathways that can be undertaken in general practice (eg sheep health and production).
 - While the European College of Zoological Medicine sub-specialities are aiming to establish alternative pathways to specialist status for those based in practice (as an alternative to full-time residency), this is not currently available.
90. Currently, the Vet Nursing of Zoo and Exotic Species Certificate covers five modules in detail, although the certificate is theory-based and does not include case work. There is an opportunity to build on this certificate to develop an RCVS post-graduate course and an advanced nursing diploma in NTCAs, including the opportunity for case work.

- **Recommendation 32:** 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.

Appendix 1

Superscript 'V' denotes regulations that apply to vertebrates; superscript 'I' denotes regulations that apply to invertebrates.

Activities and species covered	Legislation
<p>Owners and keepers of all exotic animals^V kept as pets must take reasonable steps to meet their animals' welfare needs and prevent unnecessary suffering.</p>	<ul style="list-style-type: none"> • Animal Welfare Act 2006 in England and Wales • Animal Health & Welfare (Scotland) Act 2006 • Welfare of Animals Act (Northern Ireland) 2011
<p>Keepers of specific 'dangerous wild animals'^{V I} 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.</p>	<ul style="list-style-type: none"> • Dangerous Wild Animals Act 1976 in England, Scotland and Wales • Dangerous Wild Animals (Northern Ireland) Order 2004.
<p>Businesses that sell animals^V as pets 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 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>	<ul style="list-style-type: none"> • Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018 • Animal Welfare (Licensing of Activities Involving Animals) (Wales) Regulations 2021 • Animal Welfare (Licensing of Activities Involving Animals) (Scotland) Regulations 2021 • Petshops Regulations (Northern Ireland) 2000 • Welfare of Animals Act (Northern Ireland) 2000.
<p>Exhibiting animals^V or keeping or training them for exhibition 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>	<ul style="list-style-type: none"> • Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018 • Performing Animals Act (Regulation) Act 1925 in Wales and Scotland
<p>Import and commercial use of certain</p>	<ul style="list-style-type: none"> • EU Wildlife Trade Regulations (EC)

<p>threatened species ^{VI} 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>338/97 implement the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).</p> <ul style="list-style-type: none"> • 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. • Control of Trade in Endangered Species Regulations (COTES) implements national measures in the UK, including defining offences and penalties.
<p>Keeping and trading non-native species ^{VI} 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>	<ul style="list-style-type: none"> • The Wildlife and Countryside Act 1981 s14 • Invasive Species (Enforcement and Permitting) Order 2019 • Wildlife (Northern Ireland) Order 1985 (as amended) (articles 15 & 15A) • Invasive Alien Species (Enforcement and Permitting) Order (Northern Ireland) 2019
<p>Keeping and trading certain native species ^{VI} 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>	<ul style="list-style-type: none"> • Wildlife and Countryside Act 1981 • Wildlife (Northern Ireland) Order 1985 (as amended)
<p>Taking certain species ^{VI} from the wild in the UK is prohibited. Wild birds and their eggs and certain species listed on Schedule 5 cannot be taken from the wild, except under licence.</p>	<ul style="list-style-type: none"> • Wildlife and Countryside Act 1981 • Wildlife (Northern Ireland) Order 1985 (as amended)