

Executive summary

BVA policy position on non-traditional companion animals

1. Non-traditional companion animals (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.

Welfare of NTCAs

2. We support the Five Domains model for animal welfare assessment¹, 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.² To protect, advocate and enhance the welfare of NTCAs, the Five Domains model should be applied.
3. 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.³
4. 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.

Regulation of the keeping of NTCAs

5. 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.
- **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

¹ <https://www.mdpi.com/2076-2615/10/10/1870>

² <https://www.bva.co.uk/media/4273/full-bva-position-on-animal-welfare.pdf>

³ BVA Voice of the Veterinary Profession survey 2022

which is evidence-based and proportionate (eg Pet Know-How Initiative) and show evidence of completion to the vendor at the point of sale.

- **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

6. 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 2018⁴, The Animal Welfare (Licensing of Activities Involving Animals) (Wales) Regulations 2021⁵, or The Animal Welfare (Licensing of Activities Involving Animals) (Scotland) Regulations 2021.⁶ In Northern Ireland, pet shops require a licence under the Petshops Regulations (Northern Ireland) 2000⁷, which have significantly less detailed licensing conditions, and no species-specific guidance.
 7. 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.” 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.
- **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.

⁴ <https://www.legislation.gov.uk/ukxi/2018/486/contents/made>

⁵ <https://www.legislation.gov.uk/wsi/2021/416/contents/made>

⁶ <https://www.legislation.gov.uk/ssi/2021/84/contents/made>

⁷ <https://www.legislation.gov.uk/nisr/2000/405/contents/made>

- **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

8. 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. The promotion and sale of NTCAs on social media by private individuals is of particular concern. 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.
 9. 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.⁸ These standards aim to ensure that both buyers and sellers are purchasing pets in a safe and responsible environment.
 10. We welcome initiatives such as Tech4Pets⁹ 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.
- **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

11. 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

⁸ <https://paag.org.uk/minimum-standards/>

⁹ <https://www.linkedin.com/company/tech4pets>

operating as animal welfare establishments and rehoming centres.

- **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

12. 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. A 2020 Born Free survey found that 4,000 dangerous wild animals are being privately kept in Great Britain, under licence.¹⁰
 13. 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.
 14. 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. 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.
- **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

15. 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). Breeders should not knowingly select for conformation, colours, and traits which cause health and welfare harms.

¹⁰ <https://www.bornfree.org.uk/dwamap>

International trade

16. All live vertebrate animals transported in connection with an economic activity are protected by retained EU legislation EC 1/2005 on welfare during transport.¹¹ 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.
 17. 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

18. 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

19. 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.¹² The position calls for a ban on the import into the EU of wild-caught reptiles and amphibians intended to be sold as pets.
20. 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. 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. 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. We would welcome further moves towards the development of high-welfare captive-

¹¹ <https://www.legislation.gov.uk/eur/2005/1>

¹² <https://www.bva.co.uk/media/3126/bva-and-bvzs-statement-on-import-of-wild-caught-amphibians-and-reptiles-october-2013.pdf>

breeding programmes for fish, supported by the further development of operational welfare indicators.

- **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.
- **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

21. Many NTCAs are partly or exclusively carnivorous or insectivorous and therefore require food of animal origin to ensure optimal nutrition. 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, and a risk of bites and scratches from handling.
 22. 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. 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. We consider that live-feeding of invertebrates is likely to be acceptable, but only when necessary.
- **Recommendation 28:** NTCAs which require live-feeding of vertebrates should not be kept in a domestic environment.

The veterinary professions – education

Undergraduate teaching

23. 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.
24. 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

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relief, and euthanasia to NTCA species and use the prescribing cascade due to the lack of authorised products for NTCAs.

25. RCVS recently updated the Day One Competences for Veterinary Nurses.¹³ 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, 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

26. 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.
- **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.

¹³ <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/>