

BVA and BSAVA response to Office for Product Safety and Standards consultation: fireworks and pyrotechnics in the UK

05 October 2026

Introduction

1. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With more than 19,000 members, our primary aim is to represent, support and champion the interests of the United Kingdom's veterinary profession. We therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.
2. The British Small Animal Veterinary Association (BSAVA) is a membership association run by the profession, for the profession, its aim to improve small animal health and welfare by driving excellence in small animal practice. The BSAVA has approximately 10,000 members, consisting primarily of veterinary surgeons, alongside veterinary undergraduates and veterinary nurses. We enable small animal veterinary professionals to develop their knowledge and skills through leading-edge education, scientific research and collaboration.

Question 1: Are there any other particular F2 and F3 fireworks products that you think the general public should not be allowed to buy? Please state which products and give your reasons.

3. BVA and BSAVA do not have a specific position on particular F2 or F3 firework products that should be prohibited from public sale. Our position focuses on reducing the animal welfare impacts of fireworks through lower maximum noise limits, restricting private use to recognised dates, limiting sale periods, improving labelling, and encouraging the use of lower-noise fireworks. It is a combination of the intensity, suddenness and unpredictability of fireworks which creates their negative welfare impact.

Question 2: If more products are added to the regulation 33 banned list, what consequences might there be for consumers, industry, enforcement authorities, professional users, and others? Please give your reasons.

4. If further products were added to the regulation 33 banned list, the impacts would depend on the specific products affected. From an animal welfare perspective, any measure that reduced the availability of the loudest or most unpredictable fireworks to the general public could have positive welfare benefits for companion animals, horses, livestock, wildlife and other animals. BVA and BSAVA do not hold a specific position on individual product types under regulation 33. We would therefore encourage Government to assess any changes against their likely welfare benefits, enforceability, and the risk of unintended consequences, including displacement towards other high-noise products. Clear public guidance, proportionate implementation periods, and effective enforcement would be essential. With local authority enforcement services already under significant pressure, additional responsibilities must be adequately resourced. To aid this, appropriate responsibilities should be allocated across the supply chain; manufacturers, importers, retailers and online marketplaces.

Question 3: Do you agree that regulation 33(1)(g) should be amended to make explicit that a firework comprising more than one shot tube is banned from sale to the general public? Agree, Disagree or Neither agree nor disagree

5. **Agree**
6. BVA and BSAVA agree that regulation 33(1)(g) should be amended to make explicit that a firework comprising more than one shot tube is banned from sale to the general public. Multi-shot fireworks

such as cakes and barrages result in repeated, unexpected and often prolonged loud noise which can cause significant welfare harms to animals. We therefore support the clarity that they should not be sold to the general public.

Question 4: Do you agree that the age limit for purchasing Christmas crackers should be removed? Agree, Disagree or Neither agree nor disagree

7. Neither agree nor disagree.

8. BVA and BSAVA do not have a specific policy position on whether the age limit for purchasing Christmas crackers should be removed. We understand the age limit was an EU requirement and the drive to remove is from retailers regarding age checks. Whilst the noise from crackers is minor compared with conventional fireworks, they can still be used inappropriately to cause fear and distress in animals. We would therefore question the need to remove this limit given the potential adverse effects it might have. Our fireworks policy is focused on minimising the ability of any product that can cause fear, stress, injury or other adverse welfare impacts for animals.

Question 5: Are there any other specific F1 and P1 pyrotechnics that should have their regulatory requirements increased or decreased? Please state which products, what regulatory requirements you think they should have and give your reasons.

9. BVA and BSAVA does not have a specific policy position on other F1 or P1 pyrotechnic products whose regulatory requirements should be increased or decreased. Our position focuses on fireworks and on measures to reduce their impact on animal health and welfare, including lower noise limits, clearer labelling with regards noise impact and responsible use, restrictions on sale and use, and better public awareness.

Question 6: Do you agree the decibel level of fireworks consumers use should be lowered? Choose one of the following options:

- No, the maximum noise limit for fireworks should remain at 120 dB (A,imp)
- Yes, to 110 dB (A,imp) (reducing perceived loudness by approximately half)
- Yes, to 100 dB (A,imp) (reducing perceived loudness by approximately three-quarters)
- Yes, to 90 dB (A,imp) (reducing perceived loudness by approximately seven-eighths)
- Don't know

10. Yes, to 90 dB (A,imp) (reducing perceived loudness by approximately seven-eighths).

11. BVA and BSAVA supports reducing the maximum permitted noise level of fireworks available for public sale from the current 120 dB limit. The RSPCA report *Keep the Noise Down: Loud fireworks frighten animals* (2005) sets out the rationale for reducing the limit to 97dB; most animals, especially pets, are used to and can tolerate common household noises. 97dB corresponds to the maximum measured household noise level. However, this is not based on research regarding animals' behaviour to maximum noise levels and is some 20 years old. More recently, an RSPCA fireworks poll by Savanta (2025) indicated that 62% of pet owners said their pets or animals had been negatively affected by traditional loud fireworks, with 38% consulting a vet. (<https://savanta.com/knowledge-centre/press-and-polls/fireworks-polling-rspca-17-october-2025/>) Furthermore, a report by the University of Salford, *Firework Noise and Dog Behaviour* (Study ACOUS 06488) recommended that where possible the exposure of dogs to any firework noise should be limited and where this is not possible, exposure should be limited to 74dB.

Question 7: What might be the positive impacts of reducing the maximum decibel level of fireworks available to the general public? Please explain your answer, providing evidence where possible.

12. Reducing the maximum decibel level of fireworks available to the general public would be expected to have significant positive animal welfare benefits. Loud and sudden noises from fireworks can cause fear, distress and behavioural responses in a wide range of animals,

including dogs, cats, horses, livestock, wildlife and zoo animals. These responses can include hiding, escape attempts, injury, changes in feeding or resting behaviour, longer-term anxiety, and in some extreme cases, death of the animal. It is important to acknowledge that whilst lowering the maximum is a positive step forward, it is not a complete solution to the negative welfare impact that fireworks can have on animals; they are still unpredictable with bright flashing lights.

13. Lowering the maximum permitted noise level would help reduce one of the key causes of firework-related distress. This would be particularly important because animals may not be able to understand or anticipate fireworks, and private firework use can be unpredictable in both timing and location. A lower limit would also help normalise and increase availability of quieter fireworks, while still allowing public celebrations to continue in a more welfare conscious way.

Question 8: What might be the negative impacts of reducing the maximum decibel level of fireworks available to the general public? Please explain your answer, providing evidence where possible.

14. There may be some negative impacts for businesses that currently manufacture, import, distribute or sell louder fireworks, as products may need to be reformulated, relabelled, phased out or replaced with lower-noise alternatives. Retailers may also need to manage remaining stock and adapt their supply chains. There may also be some consumer impacts if certain louder products are no longer available, particularly for individuals who currently associate louder fireworks with traditional celebrations. However, these impacts should be weighed against the animal welfare benefits of reducing noise levels and the availability of lower-noise alternatives.
15. BVA and BSAVA's view is that any negative impacts could be mitigated through a clear lead-in period, public communication, accurate labelling of firework noise levels, and support for a transition towards lower-noise fireworks. The objective should not be to prevent celebrations, but to ensure that fireworks are used in a way that better protects animal welfare. A reduction in the fireworks available to the general public may drive more people to attend organised displays. This better protects animal welfare as keepers of animals can prepare in advance.

Question 9: How much lead in time would businesses need to prepare for the changes proposed in this consultation and why? Please state a lead in time in months or years, and explain your answer, providing evidence where possible.

16. BVA and BSAVA is not best placed to provide detailed evidence on the precise lead-in time businesses would require to implement changes to product specifications, supply chains, stock management or labelling. The consultation text suggests a period of 6 months which we feel is acceptable. Whilst stakeholders in the supply chain need to input into this, from an animal welfare perspective, any lead-in period should be no longer than necessary to allow businesses and enforcement bodies to prepare effectively. The welfare impacts of loud fireworks are already well recognised, so unnecessary delay would prolong avoidable distress to animals.

Question 10: What other things should we consider when setting a lead in time? You may wish to reference the impact on people who buy fireworks, enforcement bodies, police or the general public.

17. Key times associated with fireworks use need to be considered. While giving businesses and the public time to adjust, the animals that are negatively affected by fireworks should also be protected in the meantime, so that their suffering can be reduced while we wait for legislation to come into force. Government must do what it can to prevent a surge in the disposal or mass use of existing stock in the run-up to the ban taking effect (if they go ahead).

18. There must be sufficient resource for enforcement given there are many pieces of animal welfare legislation that already exist which are not effectively enforced making the legislation ineffective in parts. This includes appropriate funding and also responsibility across the supply chain; manufacturers, importers, retailers and online marketplaces. We think any changes present an opportunity for significant awareness raising campaigns for the public and event organisers around the impact of fireworks. There should be clear Government guidance on the responsible use of fireworks highlighting the potential negative impact of fireworks on animal health and welfare. This should include recognition of the importance of safe disposal of the debris and remnants of fireworks as a key area for event organisers to consider in their planning of displays.