BVA-BSAVA response to the consultation on Pet Travel and changes to the European Union Scheme

1. The British Veterinary Association (BVA) and the British Small Animal Veterinary Association (BSAVA) welcome the opportunity to comment on this consultation.

2. The BVA is the national representative body for the veterinary profession in the United Kingdom and has over 14,000 members. Its primary aim is to protect and promote the interests of the veterinary profession in this country, and it therefore takes a keen interest in all issues affecting the veterinary profession, be they animal health, animal welfare, public health, regulatory issues or employment concerns. In preparing this response, BVA has consulted with its branches in Scotland and Wales.

3. The BSAVA is the largest specialist division of the BVA and of the veterinary profession. It represents over 9,500 members, the majority of whom are in general practice and have an interest in the health and welfare of small animals, namely dogs and cats.

4. We would like to raise the following points in response to the issues raised.

Changes to the regime:

**Q 1. Under Article 5 of the new Regulation, individuals travelling with their pets to attend a show, competition or sporting event (or training for such an event) will be exempt from the more stringent rules that will be introduced for the movement of more than 5 pets. In order to prevent abuse of this exemption, the Regulation requires individuals to provide proof that they are travelling to attend an eligible event. We are therefore interested in knowing whether the following information is usually included on the registration materials that are issued to participants by those organisations that arrange competitions, shows and sporting events:**

- Name of event
- Address of event
- Dates the event is taking place
- Sponsoring organisations
- Other (please provide details)

5. We do not have any knowledge of the evidence provided by event organisers, but in view of the large number of potential events, it is unlikely that the information will be provided in a standardised format. The exemption for individuals travelling with their pets to shows, competitions or sporting events is a significant change, and we ask Government to clarify how it
proposes to police the movement of dogs in larger numbers to shows, competitions etc. - as such loopholes will be exploited for trade - and how false documentation will be identified. It is also important to clearly define what is meant by ‘training event’ to ensure that this can be policed effectively.

Q2. The new Regulation gives member states the option of allowing individuals other than veterinarians to implant microchips for the purposes of pet travel, but requires them to establish the minimum training that person must have received (Article 18). Our preferred approach is to allow non-veterinarians to implant microchips providing they are either a registered veterinary nurse, have previously been trained on a course containing a practical element or attend an approved training course. In England and Wales the intention is to align with forthcoming legislation requiring the compulsory microchipping of dogs and laying down the training required for implantations. The Scottish Government are currently considering responses to their microchipping consultation but anticipate that any legislative requirements for microchipping in Scotland could also be aligned. Do you have any comments on this approach?

6. The implantation of microchips by the sub-cutaneous route is currently not considered to be an Act of Veterinary Surgery under the Veterinary Surgeons Act 1996, unless repair or closure of the entry site is necessary; where sedation and or analgesia are required or where there is special risk to the health or welfare of the animal. However, there is the potential for both the introduction of infection or serious injury to the animal if the microchip is implanted in the wrong site. We therefore consider it necessary that any person undertaking the implantation of a microchip into an animal should have the knowledge and understanding to carry out the procedure safely.

7. We support the introduction of a recognised qualification, which will lay down and assess minimum standards of training for those other than veterinary surgeons and veterinary nurses (working under the direction of a veterinary surgeon) who implant microchips. However, since the consultation indicates that there is no intention to create an offence in relation to this new requirement (6.5) we question how compliance with this requirement will be assessed or enforced and whether there will be a list of acceptable training courses (with a practical element) or a list of people who have previously attended such courses.

8. We ask that the Government clarify how prior practical training will be confirmed for grandfather rights. Will the training provider or the implanter need to prove that appropriate training has taken place?

9. From a practical point of view, many animals that are presented for a pet passport already have a microchip implanted. This will become even more likely after the introduction of compulsory microchipping. Details of when and by whom the microchip was implanted may not be known to the veterinary surgeon or owner.

10. We ask for reassurance that the veterinary surgeon is not required to make any checks or provide any documentation regarding the implantation of the microchip, unless they, or a veterinary nurse working under their direction, carried this out.
Q3. If you are responding on behalf of a veterinary practice that issues pet passports, we would be interested to know who currently microchips those pets being prepared for travel and if you intend to register any of your staff on the new training course?

11. In a small survey of BSAVA members, respondents noted that microchipping for pet passports is currently mostly carried out by veterinary surgeons or veterinary nurses, and these practices are not intending to send staff on the proposed training course.

Q4. The EU Regulation introduces a requirement for veterinarians to keep certain records, for a period of at least 3 years (under Article 22). Our preferred approach to implementing this requirement is to include information in the guidance and training provided to vets authorised to issue passports. Any vet found to be in contravention of this record keeping requirement may have their authorisation removed. Do you have any comments on this?

12. We understand from the consultation document that the following information will be required to be kept for three years, but that this can be kept in the client record, and that providing the information can be retrieved, no additional records will be required:
   a. The microchip number, location and date of reading/application
   b. Name, species, breed, sex, colour, date of birth and any notable or discernible features or characteristics of the pet animal
   c. Owner’s name and contact information.

13. Consultation with our members indicated that these recordkeeping requirements would not be burdensome; indeed this information is often already held on individual client records in a practice management system. However, we would appreciate clarification on how veterinary surgeons might be asked to access this information. If it is on an individual animal/client basis, this should be reasonably easy to find, but it would perhaps be more complicated to deliver up all passports produced for German Shepherd Dogs in 2015, for instance. There could also be issues for individual practices where the practice management is updated, and there may be greater issues for Cloud based computing systems as the storage and backup is outside the veterinary practice’s control.

Q5. Our assessment is that because the fundamentals of the scheme will remain the same we do not anticipate that there will be significant adoption costs for business to implement the relevant changes. Do you have any comments?

14. While we acknowledge that the fundamentals of the scheme may not be changing we are also aware that there are likely to be costs introduced as a result of AHVLA cost recovery. These are likely to include
   a. Charges to veterinary practices for the purchase of passports
   b. Costs for OV training and revalidation
   c. Costs for training of microchip implanters

15. As mentioned in paragraph 14 above, if data needs to be consolidated at all in a required format then this could also result in costs for businesses. There will also be some impact on
carriers in terms of inspecting the supporting documentation of individuals travelling under the Pet Travel Scheme to attend shows etc.

**Derogations:**

**Q6. Under the current pet travel scheme member states can authorise the movement of young, unvaccinated animals, provided they meet a number of conditions. This option will exist under the new Regulation (Articles 7 and 11). The UK has never authorised these movements and we do not intend to do so now. Do you have any comments?**

16. We strongly support the UK position in not issuing derogations from vaccination under articles 7 and 11 (derogation from the anti-rabies vaccination condition for young pet animals). We are aware of a significant influx of puppies, often underage, being brought into the UK for sale following the changes that came into effect at the beginning of 2012. We endorse the minimum age of vaccination at 12 weeks and would see the movement of young unvaccinated animals as a retrograde step, having the potential to have a significant negative impact on the welfare of those being transported.

17. We understand that derogation from rabies vaccination for movements between the UK and the Republic of Ireland under article 8 will be considered separately.

**Q7. The UK currently allows pets to enter the country and move directly into quarantine in situations where their owners are not able to make them compliant with the pet travel scheme prior to departure (for example in cases where they need to move at short notice). Article 32 of the new Regulation explicitly allows member states to authorise the movement of these pets in situations where ‘exceptional circumstances’ require an owner to enter the country at short notice. Do you have any comments about us continuing to allow these pets to enter via quarantine?**

18. We support the continuation of allowing these pets to enter via quarantine in exceptional circumstances to enable them to achieve compliance with the disease control requirements of the Pet Travel Regulations.

**Q8. The new EU Regulation introduces a maximum quarantine period for those pets that are found to be non-compliant and permits member states to determine the length of this period, up to a maximum of 6 months. Do you have any comments on our proposal to set this period at 4 months?**

19. We understand that the reason for introducing a maximum quarantine period is to allow those animals, which fail to meet the requirements of the pet travel regulations, for example animals which fail to seroconvert following vaccination, to be released. We also acknowledge that the current preparation period for a pet entering from an unlisted third country is 4 months. However, we are concerned about a maximum period of 4 months for quarantine being set, as although the majority of dogs (as well as cats and ferrets) show clinical signs of rabies within 3 months, there are cases where the incubation period appears to be 4 months or longer (see http://rabiesalliance.org/uploads/media/Scientific_resources/Policy_and_position_papers/8._Compendium_of_animal_rabies_prevention_and_control__2011.pdf)
20. We would therefore propose that the maximum of 6 months, as put forward in the EU regulation is maintained, but that individual animals undergo a risk assessment (against pre-determined criteria) to determine the actual time required in quarantine.

Final thoughts:

Q 9. To what extent do you agree that there are benefits to the changes introduced by the new EU pet travel Regulation?

21. We agree that there are benefits in the changes to be introduced under the new EU pet travel regulation in terms of:
   a. Minimum 12 week age for vaccination;
   b. Changes to the pet passport in terms of traceability (details of issuing veterinary surgeon) and security (laminated strips to cover entries).

22. We agree with the tighter definition of non-commercial movement where pets intended for sale or re-homing are subject to the requirements for commercial movements under the Balai directive; however we have concerns about how effectively this will be enforced.

23. We are unsure whether the exemptions under Article 5 allowing owners to travel with more than 5 animals to a show, competition or sporting event will be a benefit to those owners or an increased risk, and would suggest that these movements are monitored to ensure that this exemption is not abused.

24. We still have concerns about illegal importation and the challenges faced by those checking the entry of animals into the UK, for example, with microchips attached to collars and with the difficulty in assessing the age of a puppy. The existing rules should be widely published in a clear and unambiguous fashion at ports and enforcement improved.

25. We disagree with the reduction in the maximum period of quarantine to 4 months (see response above).

Q10. Do you have any further comments or suggestions?

26. We remain concerned that all animals travelling throughout Europe are treated as equals despite the varying risks of disease. Aside from the requirement to treat for tapeworm on entering those countries that are still *Echinococcus multilocularis* free, an animal from a rabies endemic country has exactly the same freedom as one from countries which are completely free from terrestrial rabies, such as the UK. This drive towards free trade has led to a significant increase in the movement of young animals across Europe for sale with little focus given to their welfare.

27. Whilst not part of the consultation, the new regulations do state “With a view to providing the citizen with clear and accessible information concerning the rules that apply to the non-
commercial movement into the Union of pet animals of the species listed in Annex I, Member States should be required to make that information, in particular the relevant provisions of national law, available to the public.” (para 29)

28. Although Defra include information on their website (https://www.gov.uk/take-pet-abroad) we do not believe that this would be the first place that members of the public would look and we would advise that this information is made available in other formats.