October 2016

CONSULTATION ON THE REVIEW OF THE NON-COMMERCIAL MOVEMENT OF PET ANIMALS ORDER 2011 (AS AMENDED)

Consultation by: Defra, Welsh Government, Scottish Government
Sent to: petorderreview.consultation@defra.gsi.gov.uk

BVA is the national representative body for the veterinary profession in the United Kingdom and has over 16,000 members. Our primary aim is to represent, support and champion the interests of the veterinary profession in this country, and we therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.

GENERAL QUESTIONS

1. Based on your experience and/or understanding, how would you rate the effectiveness of the 2011 Order at:
   • Making it easier for pet owners to travel with their pet cats, dogs and ferrets?
   • Making pet travel less expensive for pet owners?
   • Protecting human and animal health against the risks of rabies and other animal diseases?

Our understanding is that the 2011 Order was effective in making pet travel easier and less expensive for owners, which is reflected in the increased number of pets entering Great Britain via the EU pet travel scheme since UK harmonisation on 1 January 2012. In 2012 the declared import of dogs from Hungary, Romania and Lithuania increased on the previous year by 450%, 1150% and 507% respectively. Nonetheless, we still receive a large number of calls seeking advice on how to comply with the Defra guidance, which could perhaps be clearer.

BVA believes that the 2011 Order has increased the risk to both human and animal health from rabies and other diseases, some of which are zoonotic. We note that there have been no cases of rabies or Echinococcus multilocularis infection confirmed in animals entering the UK under the Pet Travel Scheme. In terms of other animal diseases, we support BSAVA in their concern that there are increasing reports in the veterinary press of vector-borne diseases such as babesiosis and leishmaniasis (which are also zoonotic) in both animals which have travelled and in some cases animals without a history of travel.

This risk of rabies and other animal diseases could be mitigated to a degree if owners were given more advice such as that available from BVA and the Animal Welfare Foundation (AWF): http://www.bva-awf.org.uk/sites/bva-awf.org.uk/files/user/taking_your_pets_abroad.pdf

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1 RSPCA (2016) Sold a pup? Exposing the breeding, sale and trade of puppies. [online] Available at: https://view.pagetiger.com/RSPCAPuppyTradeReport [21 October 2016].
Owners may also benefit from the development of guidance on buying or rescuing a pet from outside the UK alongside clearer advertisement on biosecurity and disease risks associated with pet travel at UK ports and airports.

2. If you are a pet owner, what (if any) benefits has the 2011 Order provided to you personally over the last five years?

Non-applicable

3. What do you perceive to be the benefits of the 2011 Order for wider society over the last five years?

Our understanding is that the 2011 Order was effective in making pet travel easier and less expensive for owners, which is reflected in the increased number of pets entering Great Britain via the EU pet travel scheme since UK harmonisation on 1 January 2012. Nonetheless, we still receive a large number of calls seeking advice on how to comply with the Defra guidance, which could perhaps be clearer.

4. If you are a pet owner, what (if any) costs (in the widest sense, like time and inconvenience as well as monetary costs) have you personally incurred over the last five years as a consequence of the 2011 Order?

Non-applicable.

5. What do you perceive to be the costs of the 2011 Order for wider society over the last five years?

BVA believes that the 2011 Order has increased the risk to both human and animal health from rabies and other diseases, some of which are zoonotic. This risk could be mitigated to a degree if owners were given more advice such as that available from BVA/AFW: http://www.bva-awf.org.uk/sites/bva-awf.org.uk/files/user/taking_your_pets_abroad.pdf

The number of animals being imported to the UK has increased since the introduction of the 2011 Order and our members have reported that this has been accompanied by an increase in the commercial trade of imported puppies. These animals should not be brought in under the non-commercial trade regulations but there is increasing acknowledgement, including from the Chief Veterinary Officer, that the Pet Travel Scheme is being abused to bring in puppies for sale.

The illegal importation of puppies can lead to significant financial costs for both the new owner and the Local Authority tasked with investigating non-compliance with the Order. Furthermore, there are significant animal welfare concerns associated with the breeding, husbandry and transportation of these animals.

6. It was anticipated that the 2011 Order would:
   - Reduce the financial costs falling on pet owners undertaking non-commercial travel with their pet dogs, cats and ferrets outside the UK;
BVA CONSULTATION RESPONSE ON THE REVIEW OF THE NON-COMMERCIAL MOVEMENT OF PET ANIMALS ORDER 2011 (AS AMENDED) 
OCTOBER 2016

- Protect human and animal health against rabies and other animal diseases through proportionate disease control measures (i.e. rabies vaccination and E. multilocularis (tapeworm treatment)); and
- Result in an increase in the number of pet movements into and out of the UK due to pet travel rules becoming simpler.

Based on your experience, and considering the above, has implementation of the 2011 Order over the last 5 years had any positive or negative unintended (i.e. not foreseen) effects or consequences?

BVA has not seen evidence of any positive unintended consequences of the 2011 Order. However, BVA is aware of concerns that large numbers of puppies being imported from Europe do not comply with the legislation, either because they are being brought in under the Pet Travel Scheme (as non-commercial movements) despite the intention to transfer ownership; or because, in order to fulfil public demand, they are being brought in below 15 weeks of age (the minimum age that complies with the Order). BVA considers this non-compliance with the 2011 Order an unforeseen negative consequence in terms of reduced animal welfare and increased disease risk.

It may be possible to mitigate this risk going forward by restricting the number of animals that can travel to five per consignment rather than five per person. For puppies under 6 months the number could be restricted to two per consignment, with a total of three animals allowed per consignment. This would accommodate 96.2% of UK households travelling under the pet travel scheme.2 In addition to this measure, amendment of the Pet Animals Act to cover commercial sales over the internet could be considered.

The removal of the requirement for tick treatment has increased the risk of tick-borne diseases entering the UK, which has been demonstrated by recent canine babesiosis cases in Essex, including one report of an autochthonous case.3 Leishmaniosis, ehrlichiosis and babesiosis are zoonotic and so present a risk to public health as well as posing a significant welfare impact on an immunologically naïve population of animals. This must be considered alongside the financial and emotional impact of dealing with potential treatment for these infections. BVA supports the re-introduction of tick treatment before entering the UK as a measure to mitigate the risk from tick-borne disease.

Given that the number of movements per year has increased, BVA is concerned that this has outstripped the resources available to check and enforce the Order and has increased the risk of missing non-compliance and importing disease. Veterinary surveillance cuts since 2011 are likely to have compounded these risks though reduced surveillance.

There has been a reduction in the number of quarantine premises in the UK following the introduction of the 2011 Order. In a disease outbreak situation requiring quarantine this may leave the UK with insufficient authorised premises (currently 9 for the whole UK, with a total of approx. 200 spaces).

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7. Are these assumptions from the original 2011 policy impact assessment still appropriate? If not, please provide an alternative estimate for any costs that you disagree with and supply your justification.

<table>
<thead>
<tr>
<th>Intervention</th>
<th>Average cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rabies blood test</td>
<td>£75</td>
</tr>
<tr>
<td>6-month quarantine</td>
<td>£1,500 - £3,000</td>
</tr>
<tr>
<td>Microchip implantation</td>
<td>£33</td>
</tr>
<tr>
<td>Boarding kennels</td>
<td>£12 per day</td>
</tr>
<tr>
<td>Tick treatment – (cost if animal is infected)</td>
<td>£50</td>
</tr>
<tr>
<td>Tapeworm treatment – (cost if dog is infected)</td>
<td>£10</td>
</tr>
<tr>
<td>Rabies vaccination</td>
<td>£41</td>
</tr>
<tr>
<td>Tick / tapeworm treatment – (cost of preventative treatment)</td>
<td>£12 per year</td>
</tr>
</tbody>
</table>

BVA understands these cost assumptions to be broadly accurate, although we note that costs are likely to vary between veterinary practices. Our members have made the following comments:

- The rabies blood test is no longer required for travel within the EU, but where it is required the total cost (sample, postage, packaging and testing) is approximately £85.
- As maximum quarantine is now 4 months the estimated figure could be amended to reflect that.
- As the microchipping of dogs is now compulsory in the UK this cost should not be included. The cost of microchipping a cat or ferret is between £10-£20.
- Boarding kennel costs are variable and may range from £15-£60 per day depending on the size of the dog, the area of the country and the type of facilities available.
- The cost given for tick removal is approximately £30, but treatment for infection with a tick-borne disease may amount to several hundred pounds.
- The cost of tick/tapeworm treatment varies depending upon the size of the dog. For comprehensive POM-V endo/ectoparasiticide cover it would cost approximately £10-20 per month.
- It may be prudent to include the average cost of issuing/certifying a passport at £30-50.

A small proportion of pets travelling under the scheme travel frequently enough to incur the cost of a new passport each year. It may be beneficial to consider this cost in the policy impact assessment and investigate the development of a ‘large’ passport akin to those used for human frequent travellers.
BVA CONSULTATION RESPONSE ON THE REVIEW OF THE NON-COMMERCIAL MOVEMENT OF PET ANIMALS ORDER 2011 (AS AMENDED)
OCTOBER 2016

8. Have there been any additional costs of the 2011 Order (not captured previously) on small and micro businesses? If yes, what were they?

BVA is not aware of any additional costs of the 2011 Order to small or micro businesses.

9. The 2011 Order is designed to implement EU pet travel scheme Regulation (EU) No. 576/2013 within Great Britain. Within the constraints of that Regulation, what refinements could be made to the 2011 Order to simplify its scope or improve its effectiveness?

BVA believes that the 2011 Order should include active surveillance of the potential infection risks from animals travelling under the Order.

One of the primary concerns for our members in relation to the Pet Travel Scheme is that animals for sale or transfer of ownership appear to be being brought into the UK as non-commercial movements. In order to address this, BVA makes the following recommendations:

- No more than five pets should be allowed to travel per vehicle rather than per person.
- For those travelling with more than five pets alongside a declaration of attendance at an event or show, such a declaration be applied to the vehicle rather than the person in order to limit the number of animals travelling per vehicle.
- Intelligence-led checks at borders, beyond current document and identity checks.
- Logging of microchip numbers and date of entry to aid traceability.
- Require registration of microchip numbers on a database linked to a European database such as Europetnet.
- Re-introduction of tapeworm treatment for cats
- Re-introduction of tick treatment for cats and dogs.

10. Are there are non-legislative measures (e.g. industry guidance or codes of practice) that you believe could be used to help improve compliance with the pet travel scheme rules? If yes, please list them and explain why you think such measures would be beneficial.

BVA and our specialist division, the British Small Animal Veterinary Association (BSAVA), is aware of increasing concerns from members regarding the correct completion of Pet Passports. There appears to be two main areas that are causing the majority of the problems. Firstly, that the microchip must be read and dated before the rabies vaccination is given and secondly that those travelling with their pets are not checking the requirements for travel prior to travelling.

BVA believes that amendment of the Pet Passport to highlight the need to read and date the microchip prior to rabies vaccination may improve compliance. Additionally, the use of a sticker on the outside of the pet passport (placed at a veterinary appointment or at border control checks) reminding owners to check pet travel requirements prior to travel and to encourage a pre-travel veterinary check-up may have a positive impact upon compliance with the pet travel scheme rules. Furthermore, the development of industry guidance for
veterinary practices and for the clients of veterinary practices may clarify the process, raise awareness that this is a public health/biosecurity necessity and improve compliance.

BVA believes that the 2011 Order has increased the risk to both human and animal health from rabies and other diseases, some of which are zoonotic. This risk could be mitigated to a degree if owners were given more advice such as that available from BVA/AWF:


11. Do you believe that the 2011 Order is still required?

Yes, BVA supports the retention of the 2011 Order.

SPECIFIC 2011 ORDER QUESTIONS

12. Rabies vaccination: The Non-Commercial Movement of Pet Animals (Amendment) Order 2014 amended the Rabies (Importation of Dogs, Cats and Other Mammals) Order 1974 to insert a new maximum quarantine period of four months for both “Part A” pet animals (dogs, cats and ferrets) and other non-pet rabies susceptible animals that have satisfied all preventative health measures other than those required in relation to rabies.

EU pet travel scheme Regulation (No. 576/2013) permits Member States to adopt a rabies quarantine period of up to a maximum of six months. However, following careful consideration of the available evidence on rabies incubation periods in cats and dogs and the results of a public consultation in 2014, it was decided that a four-month quarantine period for animals travelling under the Pet Travel Scheme, but that have not satisfied preventative health measures in relation to rabies, was appropriate.

This also brought Great Britain’s pet animal quarantine requirements into alignment with the four-month quarantine requirement that already existed for pet animals being imported into Great Britain for commercial reasons under The Trade in Animals and Related Products Regulations 2011.

Do you agree that a four-month quarantine period is still appropriate for pet dogs, cats and ferrets entering Great Britain under the EU pet travel scheme but that have not satisfied preventative health measures in relation to rabies? If not, why?

BVA recognises that scientific evidence supports a likely incubation period of four months for dogs and cats, with longer incubation periods having been noted occasionally, but remaining extremely rare. BVA recommends that an individual risk assessment should be made to determine time in quarantine up to a maximum of 6 months for dogs and cats to account for rare cases where incubation might exceed 4 months. BVA believes that the quarantine period for ferrets should be increased to six months due to a lack of data to support a four-month quarantine period.4

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BVA CONSULTATION RESPONSE ON THE REVIEW OF THE NON-COMMERCIAL MOVEMENT OF PET ANIMALS ORDER 2011 (AS AMENDED)
OCTOBER 2016

13. E. multilocularis tapeworm treatment: Part 2(9) of the 2011 Order sets out how pet dogs moving under the EU pet travel scheme must comply with the tapeworm preventative health measures set out in European Commission Delegated Regulation 1152/2011. This requires that pet dogs must have appropriate tapeworm treatment no less than 24 hours and no more than 120 hours (5 days) before they (re-)enter the UK.

The UK retained tapeworm treatment in 2012 because:

- incidences of the E. multilocularis tapeworm were increasing across continental Europe; and
- it is assumed that the tapeworm is likely to become permanently established if it should enter the UK.

Do you believe these assumptions are still appropriate? To what extent do you believe that current tapeworm controls should be retained?

BVA believes these assumptions are appropriate. BVA supports the continued requirement for tapeworm control and supports the EFSA recommendation that consideration should be given to shortening the treatment window from 24-120 to 24-48 hours before entry into the UK. In addition to this, BVA notes the EFSA recommendation that additional assessment of the risk posed by Echinococcus multilocularis infection in cats is warranted. In light of this, BVA supports the recommendation by our specialist division, BSAVA, to reinstate tapeworm treatment in cats before entry into the UK.

14. Other diseases of mammals and birds: Part 2 of the 2011 Order also provides for the administration and enforcement of certain EU health measures to protect the UK against the risk of other animal diseases. Specifically, these are to protect against: Nipah disease, from cats and dogs imported from Malaysia (Peninsula); Hendra disease, from cats imported from Australia; and Highly Pathogenic avian influenza, from pet birds.

Do you agree that these disease control measures are still justified? Based on your experience, are there any other ways in which these disease risks could be better addressed?

Yes, BVA believes that these measures are justified. It is unclear if these measures go far enough to control the risk of disease and improved surveillance is required to address this.

15. Microchipping of pet animals: Part 2A of the 2011 Order sets out the minimum qualifications required for persons, other than veterinarians, permitted to implant microchips for the purpose of preparing a pet for overseas travel. Those implanting microchips must be either a veterinarian, registered veterinary nurse, student veterinarian or student veterinary nurse (under the direction of a veterinary surgeon), or have attended a training course approved by the Secretary of State, Scottish Ministers or Welsh Ministers, as appropriate. An exception is also made for those

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who were trained on a microchipping course that contained a practical element before 29 December 2014.

Do you believe that these requirements have worked effectively?

The requirements for microchipping under the Order were introduced under the 2014 amendment and it is therefore difficult to assess effectiveness at this early stage.

16. Pet checkers approval process: Part 3 of the 2011 Order sets out how a transport carrier who moves a pet cat, dog or ferret into Great Britain must be approved by Government unless the movement is from the Republic of Ireland or the movement is of a recognised assistance dog from an EU Member State. The approval process requires that a carrier must undertake appropriate checks to ensure that the pets they are transporting comply with EU pet travel scheme rules. 100% of pets entering Great Britain with approved carriers are checked for compliance with the EU pet travel scheme import rules.

EU pet travel scheme Regulation (No. 576/2013) requires that Member States carry out systematic documentary and identity checks at designated entry points on pet animals that are accompanying their owner during a non-commercial movement. In practice, this involves transport carriers verifying the identification document (i.e. pet passport or third-country official veterinary certificate) of a pet animal entering Great Britain and ensuring that its details are consistent with the results of an identity check performed on the pet to establish its microchip (or other identity) marking.

Do you agree that 100% pet checks are proportionate? Why? To what extent do you agree that the pet checking process within Great Britain for ensuring compliance with the EU pet travel scheme has been effective?

BVA agrees that 100% checks are proportionate because in addition to the detected non-compliance rates of 2-4% we are aware of reports that the Pet Travel scheme is being used to illegally bring into the UK both non-compliant and animals for the commercial market.

BVA does not believe that the pet checking process has been effective for ensuring compliance with the pet travel scheme. BVA is concerned that whilst 100% of pets entering Great Britain on approved carriers are checked for compliance with the EU pet travel scheme import rules, this relies upon the carrier to have been notified of the presence of the pet(s) and equally that the nature of the checks taking place are not currently fit for purpose.

17. Enforcement: Articles 13, 14 and 15 of Part 4 of the 2011 Order set out how local authorities are the principal bodies for enforcing the EU pet travel scheme rules and the powers available to authorised officers.

To what extent do you agree that the enforcement provisions have been appropriate and effective for enforcing the EU pet travel scheme? Do you believe the enforcement provisions could be improved? If yes, please outline your suggestions.
BVA CONSULTATION RESPONSE ON THE REVIEW OF THE NON-COMMERCIAL MOVEMENT OF PET ANIMALS ORDER 2011 (AS AMENDED) OCTOBER 2016

BVA does not believe that enforcement provisions have been fully appropriate and effective for enforcing the pet travel scheme. The main areas of concern are fraudulent documentation, puppies being moved under the pet travel scheme when they are intended for sale (as it is possible to move five puppies per person non-commercially, it is possible for two or three people to bring in 10-15 puppies in this manner), and underage puppies.

BVA believes the enforcement provisions could be improved and would question whether the carriers are the right people to undertake routine checks. Authorised officers may benefit from veterinary-delivered training or guidance. It is essential for an officer to visualise the microchip being scanned. Furthermore, enforcement provisions would benefit from increased resource in light of the increased number of movements under the pet travel scheme.

Compliance may be improved via an information campaign to raise awareness of the financial, emotional and logistical costs of quarantine following the discovery of a non-compliant animal.

18. Offences and penalties: Articles 16, 17 and 18 of Part 4 of the 2011 Order set out the offences and penalties that can apply for not complying with the EU pet travel scheme rules and for not complying with notices served in relation to Avian Influenza.

To what extent do you believe that the offences and penalties have been appropriate for enforcing the 2011 Order?

If you answered ‘Strongly disagree’ or ‘Disagree’, in your opinion what sanctions could be put in place that would increase compliance with pet travel rules? Please provide evidence to justify your views.

BVA does not agree that the offences and penalties have been appropriate for enforcing the 2011 Order.

We recommend that the guidance on commercial importation of dogs, cats and ferrets is made clearer and more user-friendly to facilitate compliance with commercial import rules.