

Summary of responses to the consultation on the Rabies Control Strategy

March 2012



Llywodraeth Cymru
Welsh Government



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Introduction

1. Rabies is a serious disease which affects all warm-blooded animals, including humans, and is almost invariably fatal once symptoms have developed. Whilst the risk of rabies entering the UK is very low, it remains a high priority to protect the UK against incursion of this disease and to safeguard our rabies-free status.
2. Defra published a draft Rabies Control Strategy in June 2011, which set out the framework for how an incident or outbreak of rabies in England and/or Wales would be managed and described the general control options that have been identified for the most likely scenarios for cases of classical rabies virus and the rationale for such controls.
3. Before finalising this document, the Government wanted to understand in more detail the practicalities of the control options, in order to clarify the circumstances under which they might be used. On 18 October 2011, Defra therefore published a consultation on the Rabies Control Strategy. The consultation provided an opportunity for key stakeholders to comment on the document. The Consultation closed on 16 December 2011.
4. Further details of the consultation can be found on the Defra website at (<http://www.defra.gov.uk/consult/>).

Consultation response

5. Defra received 19 substantive responses which addressed the questions in the consultation document. Most of these responses were from the key stakeholders who were invited to respond via formal letters from Defra. The remaining responses were from a variety of interested organisations and individuals.
6. A copy of each of the responses is available in the Defra Library in London, (unless the consultee requested that the response be kept confidential). The library can be contacted on 020 7238 6575 or via email at defra.library@defra.gsi.gov.uk.

Responses to consultation questions

7. The consultation sought views on specific questions relating to the draft Control Strategy. The following sections include a summary of the main comments made in response to each question; it is not intended to be an exhaustive record of all the points made. The views given in response to this consultation are generally more nuanced than can be reflected in a short summary.
8. The responses received have been considered and have informed the Government's approach to managing the response to a rabies incident in England or Wales. This summary briefly sets out any changes that Government will consider for the Control Strategy as a result of comments received in light of the consultation.

Control Measures

Question 1: Do you have any general comments on the Rabies Control Strategy?

9. There was broad support amongst consultees for the approach taken in the Control Strategy in terms of the Government maintaining flexibility in its plans so that any rabies situation could be dealt appropriately on an individual basis. Other specific points made in the responses on the Control Strategy document and Government policy on rabies included:
 - Concern that the risk of rabies has increased as a result of the changes to the pet travel rules which came into force on the 1 January 2012; and that this could have consequential impact on the operations of front line staff in non-Governmental organisations.
 - The Government should ensure that risk assessments on the use of control options takes into account the impact on specific sectors of society/economy.
 - The Control Strategy should take a more proactive approach and include policies about how the Government will pre-emptively manage the risk of rabies.
10. There were a number of suggested amendments to the structure and content of the Rabies Control Strategy itself:
 - Additional information on wider legislation that potentially impacts on rabies control operations.
 - Specific information on which organisations handle suspect animals.
 - Detail on likely rabies scenarios.
 - Clarity on the use of definitions.
 - Provision of vaccination for front line staff.

Question 1: Government's response

11. The Government welcomes the support from consultees for the approach taken in the Rabies Control Strategy and the document will be amended to include the additional content suggested.
12. In the event of a rabies incident or outbreak the Rabies Expert Group will provide appropriate advice on the use of control options as part of the evidence produced to inform decision making. Impact on society will be considered as part of this.
13. The purpose of the Rabies Control Strategy is to set out the framework for how the Government will respond to a case of rabies in England or Wales. We already monitor occurrence of major animal disease outbreaks worldwide as an early warning to assess the risk these events may pose to the UK and publish assessment and reports on our [website](#). Wider arrangements and policies about how the Government pre-emptively manages the risk of the rabies will be taken forward separately as part of ongoing contingency planning

14. The risk of rabies entering the country under the new pet travel rules is very low, and it remains a high priority to protect the UK against incursion of rabies and to safeguard our rabies-free status. The changes that have been made to the UK's pet travel rules are scientifically justified. A risk assessment carried out by Animal Health and Veterinary Laboratories Agency is available on the Defra website. All pet dogs, cats and ferrets entering the UK from January 2012 will need to be vaccinated against rabies. Pets from unlisted countries must have a blood test 30 days after vaccination and then wait a further three months after the blood sample before being able to enter the UK.

Question 2: Should any other control measures be considered in this strategy? Should any of the listed control measures be ruled out?

15. Consultees did not suggest any additional control measures for use in a rabies incident.

16. A high proportion of consultees proposed that to help plan for and manage any rabies incident, the introduction of compulsory microchipping and an associated central database should be introduced.

Question 2: Government's response

17. The Government has been working on a package of measures to tackle irresponsible dog owners and will be announcing these soon. In putting the package together we have considered the benefits of compulsory micro-chipping of dogs and extending the current law to cover private property. The final package will cover future Government handling of these issues as well as other plans to improve the standards of dog ownership.

Question 3: What are the issues that need to be considered when determining an exit strategy? Do you have any views on when individual control measures should end?

18. Most consultees argued that the establishment of an exit strategy - the point at which controls formally end – should be based on a risk assessment and would depend on the individual circumstances of the incident and what control measures had been employed. Limited comments were received on when individual control measures should end. Suggested factors that should be considered when planning the exit strategy included:

- Extent of incident (geographical area).
- Type and number of domestic animals affected.
- Involvement of wildlife.
- Wider economic/social impact.
- Surveillance strategy.
- Public perception.
- Level of protection conferred by vaccination to domestic animals and wildlife.

Question 3: Government's response

19. The Government agrees that most of the issues identified by consultees should be considered when determining an exit strategy and the Control Strategy will be amended to explain the process for how an exit strategy will be determined and what factors will be considered as part of those arrangements. Public perception, whilst important, should not be a determining factor in this process.

Tracing

Question 4: If a stray or wild animal presents with rabies how should Government attempt to trace its movements?

20. A number of consultees recommended using local communication channels to trace the movements of a stray or wild animal. Other suggestions made by consultees included:

- Keeping a central record of all animals that enter the UK via the pet travel scheme so that strays with a foreign microchip can be identified.
- Using existing database systems, i.e. those used at Heathrow and Gatwick to track imported animals.
- Establishing a dedicated disease outbreak website to allow for the immediate posting of information.
- Working with law enforcement and custom officials.
- Contacting the owner if a stray is microchipped.
- Directed by expert advice on the likely behaviour and contacts of the infected animal.

Question 5: What role can non-governmental organisations play in helping to trace animals?

21. Many consultees believed that the role of non-governmental organisations in tracing animals would be quite limited, although a number of responses thought that non-governmental organisations could help in assisting with publicity, public education and reassurance. Responses also noted non-governmental organisation's responsibility to report any suspect cases. Other suggested roles for non-governmental organisations included:

- Sharing any intelligence received from members of the public on reported sightings of strays.
- Establishing formal contingency agreements with Government prior to a rabies incident to ensure rapid and effective response at the time of an outbreak.

Questions 4-5: Government's response

22. Government agrees that the use of expert advice and close working with relevant agencies and local communications are important components in helping to trace the movements of an animal suspected of rabies. The Government has well established contingency planning arrangements to ensure these processes work smoothly in the event of a rabies incident.

23. The Government's position on the introduction of compulsory microchipping and database is detailed at paragraph 17. Government already has well established online channels, notably the Defra website, and these have been tested and used effectively during other animal disease outbreaks. We do not therefore propose at the current time to establish a dedicated disease outbreak website for rabies.

24. Government recognises that non-governmental organisations could have an important role to play in helping to trace animals during a rabies outbreak, particularly with regards to communicating with the public. The Government will work with non-governmental organisations to explore further their role in this regard. Proposed new arrangements to establish a more formal and collaborative approach to working with key stakeholders on issues such as these are detailed at paragraph 111 – ‘the way forward’.

Surveillance

Question 6: Under what circumstances should surveillance be instigated? How long should it last?

25. Consultees strongly supported the use of surveillance of the wider animal population as a control measure if a suspect animal was identified as being unsupervised at any point during the infectious period. There were however differing views on when surveillance should be instigated. There was some support for a precautionary approach to be adopted, with the Government initiating surveillance once a suspect case was reported where possible contact with other susceptible animals had occurred. Other responses argued that surveillance of the wider animal population should be automatically instigated as soon as rabies is confirmed. Two consultees considered surveillance should only be undertaken once a veterinary risk assessment was completed.
26. In terms of duration there was a general consensus that the duration of surveillance would depend on the circumstances of each individual outbreak and that it should only end once it was confirmed that the disease had been eradicated. Two consultees suggested surveillance should be in place for a minimum of three months after the last case was confirmed.

Question 7: What elements should make up a set of surveillance controls?

27. A number of suggestions were made by consultees on what elements should make up surveillance controls including:
- Identification of animals that have had contact with confirmed case(s).
 - Monitoring of behaviour in both contact animals and wider animal population (including wildlife).
 - Evidence of fighting or potential contamination of wounds in confirmed case(s).
 - Reports of suspect cases/suspicious deaths and their investigations.
 - Laboratory testing of contact animals should they die/be euthanased.
 - Euthanasia and post mortem testing of wild animals showing abnormal behaviour or symptoms of rabies.

Questions 6-7: Government response

28. The Government does not propose to tightly define the circumstances under which surveillance will be initiated or the length of time it will continue but will review the position set out in Control Strategy to determine whether further clarity can be provided. The Government agrees that the justification for any active or passive surveillance work should be supported by a robust risk assessment.
29. The circumstances that would instigate surveillance and the elements that make up a set of surveillance controls would vary according to the individual scenario. The surveillance elements identified by consultees will all be considered as part the decision making process into establishing surveillance and will be recorded in the revised Rabies Control Strategy.

Declaring an Infected Area

Question 8: Are there particular circumstances when an Infected Area should always be declared?

30. Responses proposed declaring an Infected Area for a range of scenarios, including:

- The primary source of infection is still under investigation.
- There is a risk of onward transmission from a known source.
- There are populations of susceptible animals in the vicinity.
- A confirmed case has had interactions with other animals outside of its home environment.
- There are multiple rabies cases confirmed without a clear link between them.
- Rabies is confirmed in wildlife.
- Rabies is confirmed in stray or free-roaming animals (where contacts are untraceable).
- There is a risk of disease spreading to the human population.

Question 9: Should any additional measures be undertaken in the vicinity surrounding an Infected Area where animals are considered to be at risk?

31. A number of responses argued that the introduction of additional measures outside an Infected Area was highly dependent on the specifics of the incident. Most consultees agreed with the Government proposals to instigate a communications campaign in the vicinity surrounding an Infected Area where it was considered those animals were at risk. Other measures suggested in responses included:

- Vaccination of pet population.
- Vaccination of wildlife.
- Surveillance.
- Behavioural/movement restrictions.
- Strong enforcement of controls.

Questions 8-9: Government response

32. The circumstances identified by consultees broadly correlate with the Government view set out in the Control Strategy on the scenarios that would make the declaration of an Infected Area more likely.

33. The Government considers that given the significant practical, social and political ramifications associated with declaring an Infected Area, this should remain a flexible control that is applicable, in principle, in all circumstances. We will consider further whether any of the scenarios suggested by consultees should mean that an Infected Area must be declared and any changes will be reflected in the revised Rabies Control Strategy.

34. The Government will maintain the current approach set out in the Rabies Control Strategy to focus on communication/awareness raising measures in the area surrounding an Infected Area if animals in that area were considered to be at risk. Under the Rabies (Control) Order 1974, the use of control measures such as vaccination and behavioural/movement restrictions can only be implemented within an Infected Area.

Destruction and detention

Question 10: Are there any circumstances under which animals suspected of being infected may be detained in quarantine rather than destroyed?

35. A number of consultees thought that there were circumstances under which suspect animals could be detained in quarantine rather than destroyed, in particular if the animal had not shown any clinical signs or that there was no evidence that it had bitten or scratched another animal or human. Other points made in responses related to the detention of suspect animals included:

- Context is important: any decision to quarantine a suspect case should take account of the extent of the outbreak, including the numbers of animals affected and species confirmed. The greater the outbreak and the closer to the focus that a suspected case is, the lower the justification for quarantine.
- Where long-term detainment causes stress to an animal which becomes detrimental to its health and wellbeing, then euthanasia may be the best option.
- The kennels facilities would need to be assessed as being suitable for the long term housing of pets.
- Suitably trained staff would need to be available to look after potentially infected animals.
- If owners perceive that there is no alternative to destruction they may be less likely to come forward/report suspect cases.
- Quarantine could be considered for specific categories of animals, providing disease control is not compromised, as per other exotic disease outbreaks (for example if they are a protected species).
- Long-term quarantine may be unnecessary, in the future, if an effective pre-mortem test to confirm rabies can be developed.

Question 10: Government response

36. Consultees support the approach to detention of suspect animals set out in the Control Strategy so the Government proposes to maintain its position. Such cases should only be detained under quarantine under exceptional circumstances and supported by a robust veterinary assessment, given the seriousness of the disease and the challenges associated with running suitable facilities for such cases. The Government will develop and agree a decision tree to clarify how such decisions will be made and this will be published in the revised Control Strategy.

Movement Restrictions

Question 11: Under what circumstances should the restriction of pet animals to the owners home be considered? What should the criteria be for home restrictions?

37. There was a general acknowledgment in the responses received that such restrictions created a number of challenges that would need to be resolved, in particular to ensure that an animal's welfare needs were adequately met and that there were sufficient resources to allow for effective enforcement. Some consultees did not support the use of home restriction, given these challenges.
38. Views on the circumstances under which home restrictions should apply fell into three broad categories:
- Any outbreak where a contact animal is identified.
 - A widespread rabies outbreak in domestic pet population.
 - Pet animals that were not vaccinated in the event of an outbreak confirmed in the wildlife population.
39. The key criteria identified by consultees was ensuring that the welfare needs of animals under home restriction are met. Other suggested criteria included:
- Animals should not be able to contact any other animals or human visitors outside of the immediate household.
 - Authorities must be able to access the household on demand.
 - Should be supported by a veterinary risk assessment.
 - Provision of secure facilities.
 - Consent of neighbours.
 - Contact animals to be vaccinated, show no clinical signs and have not bitten or scratched any other animal or person.
 - The role and purpose of an animal (i.e. if it performs a function on a farm).
 - Should apply to cats only.

Question 12: Do you have any information on the likely costs of enforcement?

40. Only one response was received to this question. The consultee suggested that costs of enforcement would be dependent on size and duration of outbreak but that the cost to Local Authorities for collection and detention of strays and enforcement would be substantial, particularly as the number of strays or disowned animals would be likely to increase.

Question 13: What are the welfare issues that need to be considered?

41. The welfare issues identified by consultees related principally to the difficulty for animals to express normal behaviour if movement restrictions were in place, as enshrined in the Animal Welfare Act 2006 with the 'five freedoms' principles. Consultees that identified welfare as a possible issue argued that behavioural issues were likely to result if an animal's needs were not met and that the welfare

- The period of restriction should be kept to a minimum while safeguarding human and animal health.
- There would be an impact on pet owners who would need to adjust their lifestyle/working arrangements to look after their pet to ensure its welfare needs were met.
- Consideration should be given as to how animals could be moved to a veterinary practice for treatment if this is required.
- There are particular issues to consider in relation to movement restrictions on animals in animal rehoming centres.
- The welfare of wildlife subject to control measures that may include poisoning and trapping would be acute and needs to be considered more fully in the Rabies Control Strategy.
- The welfare needs of animals should be balanced against the risk to human health.

Question 14: Under what circumstances should movement in and out of an Infected Area be enforced?

42. As with other controls, consultees considered enforcing movement in and out of an Infected Area would depend on the specifics of the incident. There were limited views from consultees on particular circumstances – two consultees thought that movement in and out of an infected area should always be enforced, with one suggesting that only animals which have been vaccinated and identified should be allowed to move to or from Infected Areas; another consultee considered that movement should be enforced only when multiple cases were identified, particularly if cases might be unrelated and/or there was evidence of wildlife involvement.
43. One consultee argued that movement of domestic animals in and out of an Infected Area may need to be considered for the provision of veterinary treatment. Such an exemption may also be required if vaccination was deployed as a control measure, depending on the size/situation of the Infected Area.
44. A number of consultees had views on the compliance challenges associated with controlling movement in and out of an Infected Area, in particular the practicalities of enforcing such a control over a large/complex urban area, the availability of powers to stop and search vehicles and whether it would be preferable to seek voluntary compliance through a communications campaign.

Questions 11-14: Government response

45. The Government proposes that the option of restricting a pet to the owner's home should be maintained as a possible control measure and that it is unlikely to be implemented for minor or localised incidents given the challenges that pet owners will face in terms of meeting biosecurity requirements and the welfare needs of the animal and that enforcement would require a significant commitment of local authority time and resources. The Government agrees that the circumstances

suggested by consultees would make home quarantine more likely and will amend the Control Strategy to clarify this position. We recognise it would be helpful to provide clear criteria for home restrictions and, based on consultee comments, will take this work forward as part of ongoing contingency planning work.

46. Restricting movement in and out of an Infected Area presents particular logistical and practical issues but the Government proposes to maintain this as a possible option that should be considered at each stage of an outbreak given the need to maintain flexibility.
47. Welfare issues relating to the movement restriction of animals would need to be adequately mitigated in order for such controls to be implemented. Whilst limited information was provided on the costs of enforcement there is strong anecdotal evidence to suggest that this is a significant factor to both consider and resolve when considering implementing movement restrictions.

Vaccination of domestic animals

Question 15: Are there particular circumstances when you think vaccination should or should not be used?

48. There was extensive support amongst stakeholders for vaccination as a control measure to be considered for use in a rabies incident. In terms of particular circumstances when it should or should not be used, points made included:

- The decision should be guided by a veterinary assessment.
- Vaccination should be used in any case of rabies unless the suspect case(s) was in quarantine or the risk of the animal having any contact with any other animal was considered negligible.
- Vaccination should be encouraged in the event of any outbreak and should be compulsory in any Infected Area that is established.
- Vaccination should be used when multiple cases have been identified, particularly if cases are apparently unrelated and/or there is evidence of wildlife involvement.
- Vaccination should be given to puppies in or near an Infected Area so that they can be socialised and/or re-homed to avoid problems associated with poor socialisation.
- The best way to use vaccines are as a preventative tool so vaccination should be used in response to increased risk of disease, perhaps by offering a targeted roll out to encourage as much coverage as possible.
- The presumption should be for vaccination unless it would interfere with diagnosis in the early stages of the outbreak.

Question 16: Should vaccination be voluntary or compulsory?

49. Of the 12 responses that directly addressed the question, 8 thought that vaccination should be compulsory in an Infected Area. Other points made in responses included:

- Whether vaccination should be voluntary or compulsory should depend on the level of risk posed by a rabies outbreak.
- It should also depend on whether the owner is willing to keep their pets entirely within their own property.
- Owners should be made aware of the consequences of having a non-vaccinated animal in an Infected Area, if their area's designation changes.
- If an outbreak is declared a significant number of pet owners will wish to get their pets vaccinated without the need for compulsory measures

Question 17: If compulsory how would vaccination be enforced? What are the barriers to enforcement? If voluntary how would vaccination uptake be monitored?

50. Responses broadly agreed that a compulsory vaccination programme would need to be enforced through the relevant authorities, supported by sanctions for non-compliance and suitable identification.

51. Possible barriers identified by consultees included:

- Co-operation would be required from veterinary surgeons in an Infected Area to proactively vaccinate and monitor the uptake.
- The costs associated with a vaccination campaign (including procurement and distribution).
- How rapidly vaccines could be manufactured and procured in sufficient quantities.
- Unwillingness of some pet owners to participate.
- Cost and resources of vaccinating feral and free-living cats.
- Resources available to the local authority and police.

52. A number of consultees thought that monitoring the uptake of a voluntary vaccination programme would be challenging as records on the number and location of pet animals in England and Wales are not kept by Government. One consultee suggested this could be addressed in part by using records of animals registered at veterinary practices but that this would not cover those animals not registered.

53. Suitable identification of animals that were vaccinated was seen as important under a voluntary approach. One consultee suggested it would be better to offer incentives, for example the freedom to move an animal if it was permanently identified and vaccinated.

Question 18: Should vaccination be targeted or made generally available within an Infected Area? If targeted, what criteria should be taken into account?

54. Of the responses that directly addressed this question, there was a broad division between those that favoured targeting vaccination for domestic animals within an Infected Area, and those that thought it should be made generally available, if resources allowed. One response said that restricting access to a vaccine, which is normally freely available, in the event of an outbreak is likely to provoke a negative reaction from animal owners and the media.

55. Responses on what criteria should be used if vaccination was targeted included:

- Dogs should be prioritised as they pose the greatest risk to human health.
- Vaccination of wildlife and feral cats should be prioritised in a major outbreak to avoid rabies becoming endemic in the free-living population.
- Targeted vaccination should be based on a risk assessment.

Question 19: Should vaccinated animals be identified? If so how?

56. Of the 13 responses that directly addressed this question, 12 agreed that vaccinated animals should be identified. The majority of those in favour of identification recommended that this was achieved through microchipping. 4 responses supported having visual identification in addition to/instead of

57. One consultee thought it would be bureaucratic to keep vaccine records other than those kept through normal veterinary medicine distribution channels.

Question 20: What are the barriers to the supply, distribution and take up of vaccination? How can these be overcome?

58. Suggested barriers identified by consultees included:

- There would be limits as to how quickly sufficient vaccine could be produced in the short term. This could be overcome by importing vaccine supplies initially and controlling supply to ensure it is targeted. Government contingency plans should also address the stockpiling, supply and distribution of vaccine.
- Veterinary practices may need access to additional staff to meet the demand. A change in the Veterinary Medicine Regulations allowing registered veterinary nurses and/or non-registered qualified veterinary nurses to prescribe and administer rabies vaccinations could help address this.
- There is uncertainty about the role of local authorities in supporting this work given, given the economic and human resource pressures they face and their lack of expertise in this area.
- The cost of vaccination may be a significant issue. This could be overcome by Government providing free vaccination.
- The personnel involved in vaccination must be protected against rabies.
- Suppliers may take economic advantage of a compulsory order to vaccinate.

59. Two responses thought that supply and distribution of vaccination was not an issue, given the scale of vaccine production worldwide and the relatively straightforward process of diverting some of that stock to the UK in the event of an outbreak.

Question 21: If a rabies outbreak is suspected or confirmed in wild animals, under what circumstances should a domestic animal vaccination programme be considered?

60. The majority of responses proposed that under the circumstances of a rabies outbreak being suspected or confirmed in wild animals, a vaccination programme for domestic animals should be determined based on the outcome of a veterinary risk assessment. Four responses thought that a domestic animal vaccination campaign should be initiated if it was confirmed that the disease was spreading within the wildlife population.

Questions 15-21: Government response

61. The Government recognises the clear views expressed by consultees on the importance of vaccination as a control measure and will clarify the circumstances under which vaccination is likely to be deployed in the revised Control Strategy.

62. No clear picture has emerged from the consultation on whether vaccination should be compulsory and to what extent vaccine is targeted. This reflects the current position taken in the Control Strategy and underlines the importance of maintaining flexibility to ensure that a vaccination programme, if required, is constructed and delivered in the most appropriate way to deal with the individual circumstances of the particular rabies case. There was clear support for ensuring that vaccinated animals are suitably identified and the Government agrees that this should form an important component of a vaccination programme.
63. Consultees made a number of important comments on the potential barriers associated with the use of vaccination. Government does not believe these issues should mean that vaccination as a control option should be ruled out but will explore these practical issues further as part of ongoing contingency planning arrangements.

Behavioural Restrictions

Question 22: Is it practical to require all dogs to be on a lead or muzzled?

65. Of the 12 responses that directly addressed this question, 10 thought that it was practical to require all dogs in an Infected Area to be on a lead in the event of a rabies incident, particularly if such controls were only required in the short term.

66. There was less support for the use of muzzles, with health and welfare issues and the fact that fewer pet owners own muzzles being identified as the main reasons why it was not a practical control to consider. One responder advocated very strongly in favour of using both leashing and muzzling.

67. Other responses to this question included:

- The decision to require leashing/muzzling should be judged on a case by case basis and consider factors such as the severity of the outbreak, location, potential spread to wildlife and the number of cases reported.
- Consideration of the function of the dog is important. It would be impractical to require this of farm and country working dogs.

Question 23: What are the benefits/drawbacks to leashing/muzzling? Are there particular circumstances when one or the other should be used?

68. The benefits/drawbacks to leashing identified by consultees included:

Benefits

- Enables control which can prevent a dog from escaping and minimises contact with potentially infected animals.
- Easily available and can be used for the vast majority of dogs.
- Provides reassurance to the public.
- Energetic dogs can still be exercised on an extendable lead.

Drawbacks

- Energetic dogs might be more difficult to safely walk on a lead.
- Leashing would increase the risk of compromising the dog's welfare by restricting its exercise which in turn could increase the risk of a bite to the owner holding the lead.
- It will not stop an infected dog being able to bite or being bitten by another dog.
- May be difficult to apply to other animals.

69. The benefits/drawbacks to muzzling identified by consultees include:

Benefits

- Reduces the risk of dog bites, both to humans and other animals.
- Provides reassurance to the public.
- Can be used as a short term measure to help control/handle an animal.

Drawbacks

- Muzzling dogs for long periods of time or using the wrong muzzle type may have welfare implications.
- Some dogs need to be trained or conditioned to wear a muzzle.
- Consideration must be given to safely muzzling dogs that have pre-existing health conditions.
- Could be inappropriate for use during exercise, especially in hot weather.
- Different muzzles are required to fit different dogs.
- May be difficult to apply to other animals.

70. Points made in response to whether there were particular circumstances when either leashing and/or muzzling should be used included:

- Leashing and muzzling should only be considered while the extent of an outbreak is being assessed and the outbreak controlled.
- The challenge of providing muzzles in an appropriate range of sizes and shapes means this could only be implemented as a control in a small area.
- If the rabies case was severe with multiple cases being reported with an unconfirmed link to wildlife, then these restrictions could be justified to potentially help reduce further transmission. However the same would not apply to a low level risk outbreak.

Question 24: If compulsory, how would these measures be enforced? What would the practical challenges be?

71. One response suggested that enforcement patrols would need to be set up initially, with enforcement becoming reactive to complaints later on. A number of consultees thought that the enforcement of behavioural controls would be challenging. Some responses argued that enforcing the use of leashes and muzzles was a realistic option as they were easily visible, provided sufficient resources were available. Sanctions were supported as a way of ensuring compliance.

72. Consultees noted that the main practical challenge associated with these controls would be the cost and availability of muzzles. It was suggested that the Government should consider holding a supply of muzzles for free distribution in the case of a confirmed outbreak. One consultee argued that both muzzling/leashing should be seen as a proportionate response to the risk otherwise the pet owning public could ignore the controls making enforcement difficult.

Question 25: Do you have any information on the current stocks and types of muzzles available?

73. No information was provided by consultees on the current stocks of muzzles.

74. A number of consultees recommended that only basket type muzzles should be considered for welfare/disease control reasons. Other points made on the types of muzzles available included:.

- Types of muzzles include plastic, wire and fabric varieties. There are several companies who supply muzzles but as there are approximately 8 million dogs in the UK, it is likely that demand would outstrip supply if a major outbreak occurred.
- Supply of muzzles should be focused on those handling dogs and at most risk of being bitten.

Questions 22-25: Government response

75. Government believes that the arguments put forward by consultees on the advantages and disadvantages of using muzzles and leashes reinforces the current position in the Control Strategy that these behavioural controls should be determined depending on the particular circumstances of an outbreak.

76. Government agrees with the majority of opinion that under certain scenarios the use of leashes is a more practical requirement than muzzling and we will consider whether additional clarity can be added to the Control Strategy on the types of scenario when such controls would be considered for use.

Animal Gatherings

Question 26: Under what circumstances should animal gatherings be banned?

77. A number of responses thought that all animal gatherings should be banned within an Infected Area, with some support for this to be extended across the whole country, particularly in the event of multiple rabies cases.
78. One response argued that banning an animal gathering should be reserved for extreme cases only, for example if an event's location was in an area that had reported cases of a severe rabies outbreak. Another response suggested that banning any sort of animal gathering carried economic consequences so should only be done on the basis of a full risk assessment and where alternative strategies to protect the animals and public could not be guaranteed to work.
79. Two responses noted the need to clarify the definition of an animal gathering, specifically whether this included activities such as game shooting, and gundog field trials and canine obedience events.

Question 27: Would licensing animal shows be an effective compromise? Is it practical to license individual animal shows across the country?

80. Of the 13 responses that directly answered the question, 6 thought that licensing animal shows would be an effective compromise, with suggested licence conditions including:
- Pets taking part would need to have been vaccinated beforehand.
 - Veterinary surgeon assessment on entry and declaration by pet owner that the dog had not travelled from an Infected Area.
 - Secure isolation / holding facilities in case of suspect disease or dog fights.
 - Appropriate public health safeguards.
81. 7 responses argued that that licensing animal shows should not be considered in the event of a rabies incident. Some responses in favour of licensing animal shows also noted some drawbacks. Comments included the following:
- The lead time for all animals to be vaccinated would be a potential barrier.
 - There would need to be safeguards in place to reduce the risk to animals attending,
 - Licensing is impractical and unnecessary work when Government will be occupied with managing a rabies outbreak.
 - Licensing unlikely to have much influence on disease control.
 - Most such shows are already licensed in some form so further licensing would add complexity and make situation possibly more confusing for pet owners.

Questions 26-27: Government response

82. Government believes that it is important to retain the power to ban animal gatherings if this is considered prudent for disease control reasons. The

difficulties associated with licensing such events is noted but this should remain an option, particularly in light of challenges posed by the Rabies Control Order 1974 in requiring all banned animal gatherings to be covered by an Infected Area status. The Government will review the definition of animal gatherings in the Control Strategy.

Control of strays

Question 28: Are animal welfare charities likely to accept stray/feral animals in the event of an outbreak?

83. A number of responses thought that animal welfare charities were unlikely to be able to accept stray/feral animals as the possibility of them having suitable capacity at any one time would be small and in the event of a rabies outbreak such charities would be under greater pressure to take in further unwanted pets, thereby compounding the matter.
84. Subject to the issue of capacity, there was some support for charities to accept such animals in principle, but only on the basis that free vaccines were made available to protect animals and staff in these centres; and that kennelling facilities should be suitable to prevent further transmission of the disease.
85. There was no support for animal welfare charities to turn their centres into official quarantine premises both in terms of the high risk this would present and the fact that there was in general a lack of secure isolation facilities at such premises.
86. Other points made in responses included:
- Feral cats should not be confined in pens for any significant length of time for welfare reasons.
 - Animal welfare charities would like further advice from the Government on what their role would be in the event of an outbreak.
 - By taking in stray/feral animals beyond the capacity of a centre there would be an impact on the welfare of all pets.

Question 29: How could local authority resources/expertise be best deployed in dealing with stray animals in the event of a rabies outbreak?

87. Suggestions from consultees about how local authority resources/expertise could best be used to deal with stray animals included:
- Trapping, vaccination and euthanasia of strays.
 - Seizing animals along with law enforcement officials.
 - Mobile patrols.
 - Public information campaigns.
 - Supervising volunteers.
88. Other, broader comments on local authorities role in an outbreak included:
- Government must ensure that stray dog services are properly supported both financially and through expertise.
 - Local authorities may not have adequate resources and expertise to deal with strays in the event of an outbreak.

- Local authorities should have contingency plans in place for a rabies outbreak which should include consideration for how animals will be collected and where they will be taken.
- Although local authorities are required to take responsibility for stray dogs and provide a dog warden service they do not have similar responsibilities/resources for cats.
- The need to ensure joined up working in between district and county councils.

Question 30: What other options are there for managing the risk from stray/feral animals?

89. Managing the risk from feral cat populations was seen as a particularly difficult challenge by some consultees as these animals could be resistant to handling, restraint or any degree of restriction. For these animals vaccination was seen as the preferential form of treatment. Other suggestions included permanent identification, neutering and euthanasia.

90. Other points made by consultees included:

- Taking in stray/feral animals beyond the capacity of a centre would have an impact on the welfare of all pets. Stray dogs are likely to be amenable to capturing and kennelling as the majority are likely to be owned dogs that are either unwanted or uncontrolled.
- Introducing a national stray dog strategy would help guide stray dog services by dealing with potential impacts of outbreaks and ensuring systems are in place to deal with such crises.
- Launching a communications campaign encouraging locals to report unusual animal behaviour or biting incidents and providing general educational advice on rabies as well as human and animal health.
- Wholesale destruction of strays has proven to be ineffective for controlling rabies in other parts of the world and also there is likely to be public outcry if this was to be implemented.

Questions 28-30: Government response

91. The Government recognises that there are concerns about the capacity of both animal welfare charities and local authorities to deal with stray animals in the event of a rabies outbreak. We agree that further discussions with these bodies are needed to clarify roles and responsibilities. Proposed new arrangements to establish a more formal and collaborative approach to working with key stakeholders on issues such as these are detailed at paragraph 111 – ‘the way forward’.

Livestock controls

Question 31: What control options need to be considered for livestock in the event of a rabies outbreak?

92. One consultee proposed that given farmed herbivores are considered dead end hosts, the emphasis should be on preventing disease coming on to a farm, protecting the health of farm families and workers, preventing animals capable of onward transmission of disease (farm dogs, cats, rodents, wildlife) from contracting or spreading disease further and maintaining the financial and practical viability of the farm business during any disease event.

93. Specific control options suggested for livestock during a rabies outbreak included:

- Vaccinating all veterinary surgeons, farmers and other workers handling animals of any species susceptible to rabies in an Infected Area.
- Making vaccines available for all susceptible animals, especially those that are hard to contain such as farm cats.
- Biosecurity practices such as rodent and wildlife control.
- Kennelling farm dogs as part of a wider rabies biosecurity.
- Communication campaigns targeted to raise awareness of the disease risks and symptoms, the appropriate reactions to any disease suspicion, public reassurance about food safety, vaccine use and responsible access to the countryside by recreational visitors.
- Surveillance.
- Movement restrictions.

Question 31: Government response

94. The Government believes it would be beneficial to clarify the approach on possible prevention and control measures for livestock in the Control Strategy and will arrange further discussions around this aspect of the disease with the livestock industry and others as part of ongoing contingency planning arrangements.

Communications/raising awareness

Question 32: During 'peacetime', how can we best balance the need to maintain levels of awareness amongst veterinarians and animal welfare organisations, whilst avoiding overstating the risk of rabies, in order to encourage suspect cases to be reported.

95. Suggestions from consultees on effective ways of maintaining awareness of rabies amongst veterinarians and animal welfare organisations included:

- Encouraging UK veterinary and welfare organisations to take part in World Rabies Day.
- Regular communications in veterinary journals, and continuing professional development events that are open to both veterinarians and lay people.
- Awareness talks for vets, looking at diagnosis, differential diagnosis and case management.
- Review awareness campaigns that are used in other disease-free countries.
- There should be a clear commitment to awareness and knowledge sharing among the veterinary profession in the Rabies Control Strategy.
- Defra to host a stakeholder event looking at options for awareness raising and a communications strategy on rabies.

96. A number of responses also considered the issue of wider awareness raising amongst the public. Comments included:

- All people dealing with animals including pet owners should be made aware of rabies and the risk of other exotic diseases entering the UK. There should be an education programme in the media, explaining that travelling abroad with pets is not risk-free. Training and education material should be made available free of charge and publicised to vets and animal welfare organisations along with free rabies vaccination.
- Promotion of normal animal behaviour and animal needs should be targeted in schools and members of the public to improve animal welfare generally and enable quicker recognition of abnormal animal behaviour.

Question 33: How is communication/awareness raising with members of the public best achieved in an outbreak?

97. Comments on the approach to be taken on awareness raising with members of the public centred on Defra working with partner organisations to ensure that messages about the risks are consistent, reached as wide an audience as possible and provided the public with reassurance.

98. Methods proposed on how to reach the public included:

- Communication campaign posters/leaflets/messages that could be distributed widely around a local area as well as any surrounding neighbourhoods,

- All forms of media (TV, radio, newspaper/magazines, internet, social media, local advertising) should be utilised to reach all ages and sections of society.
- Direct mail - veterinary surgeries have contact details for animal owners.
- A dedicated website with up to date information.
- Dissemination via the veterinary profession and animal welfare organisations.

Question 34: What should the key elements of an effective communications campaign be?

99. Consultees suggested an effective communications campaign should include the following:

- Aim to reach as many people as possible including those who would not normally use veterinary services.
- Messages should be consistent, simple and easily understandable by all.
- Include information on the nature of the risk and proportionate precautions in preventing rabies.
- Vets with first-hand field experience of rabies should prepare awareness talks for vets in affected areas.

Question 35: Are there alternative means by which the public can report animals they suspect may have rabies?

100. Responses to this question supported the proposition to establish a helpline in the event of an outbreak. Other suggestions for how the public could report suspect cases included:

- Dedicated disease website/online reporting.
- Text messaging.
- Local authority.
- Police stations.
- Veterinary surgeons.
- Commercial businesses (for example pet shops, farm and equestrian suppliers).
- Non Governmental Organisation websites (copies of pre-prepared reporting forms could be provided to such outlets).

101. Other more general comments included:

- The public may be reluctant to report suspect disease if they perceive that reporting is likely to lead to the death of their pet.
- Email and reporting online is not suitable as specific details will be needed and the person may need advice and reassurance.

Questions 32-35: Government response

102. The Government agrees that communications with the general public during an outbreak is best achieved by Defra and/or Welsh Government working with

partner organisations and these arrangements are enshrined in [Defra's Contingency Plan for Exotic Notifiable Diseases of Animals and Welsh Government's Contingency Plan for Exotic Animal Diseases](#). During disease outbreaks operational partners will be part of the operational level response and will help inform local decision making as appropriate and will assist with ensuring that developments in local operations are communicated to all relevant parties.

103. The Government agrees that for each rabies outbreak or incident it is important that there are effective, timely and accurate communications with stakeholders, pet owners, the public and the media. Appropriate communications tools, including those identified by consultees, will be used to assist in reducing the impact and spread of disease and to provide accurate, timely updates on the latest situation.

Wildlife Vaccination

Question 36: If a rabies outbreak is suspected or confirmed in domestic animals, under what circumstances should a wildlife vaccination programme be considered?

104. There was broad agreement from consultees that the decision to undertake a wildlife vaccination programme should be based on a risk assessment which indicated evidence the virus may have spread between domestic animals and wildlife. Responses suggested that due to the fact infection with the rabies virus required transfer of saliva through a bite or other wound, factors likely to increase the possibility of vaccination would include evidence of close contact with infected wildlife, or uncertainty regarding the whereabouts of the infected domestic animal populations when it may have come into contact with wildlife.

Question 37: Are there circumstances when control of wildlife through vaccination may not be possible or desirable?

105. A programme of vaccination was seen by the majority of consultees as the most appropriate control to implement where it is believed that there is a risk of wildlife infection. It was recognised that there could be circumstances under which other control measures might also be needed including:

- If vaccination bait uptake in some species is low.
- Concerns about the efficacy of the vaccine.
- Evidence of side effects to non-target species consuming the vaccine.
- If there was a negative impact on other disease control programmes that were taking place.
- If there was established infection in the wildlife population.

Question 38: What are the practical issues associated with vaccination of wildlife in both urban and rural environments?

106. A number of practical issues were highlighted by consultees including:

- Difficulties associated in identifying vaccinated animals.
- Unknown efficacy of vaccine in different target species.
- Time taken for vaccination programmes to become effective.
- Identification of suitable bait.
- Risk of non-target species eating the baits, particularly in urban areas.
- Poor knowledge of target species in the locality.
- Members of the public moving bait/vandalising traps.
- Cost, ownership, supply and conditions of vaccine.
- Inter-relationship with other disease control programmes.
- Restricting alternative feed supplies (to encourage animals to take the bait).
- Implications of prolonged access bans to the local economy.
- Availability of skilled field staff ready to undertake wildlife vaccination.

Wildlife Destruction

Question 39: Are there circumstances when destruction of wild animals would be preferable to vaccination?

107. There was only limited support for the destruction of wildlife to be considered as a control measure. Culling was seen by many consultees as being socially unacceptable, there were concerns about the implications of using poisoned baits both on the target and non-target species; and there was evidence to suggest it was less effective than vaccination as a control method. Nevertheless, a limited number of circumstances were identified as being scenarios under which destruction of wildlife might be considered:

- A vaccination programme is unlikely to treat infection from already infected individuals and therefore some control of wildlife may be necessary.
- If the prevalence was very high in certain areas, destruction might be considered with vaccination in the surrounding vicinity, defined by geography and population density of susceptible species. Post-mortem examination would help to define the extent of the outbreak within the wildlife population.

Wildlife Surveillance

Question 40: Under what circumstances should surveillance rather than vaccination/destruction of wild animals be used as the primary control measure?

108. Responses to this question generally supported the idea that surveillance should be determined subject to the individual circumstances of the case but as a general rule, surveillance would be used as the primary tool in a situation where the risk of infection to wildlife was considered negligible i.e. rabies had been found only in domestic animals that were known not to have had any contact with wildlife. Surveillance may also be desirable in urban areas where deployment of vaccination or culling may be impractical.

Question 36-40: Government response

109. Government agrees with the views of consultees that vaccination should be the *preferred* disease control method, although vaccination will not be effective in treating infection in animals that are already infected with rabies. Epidemiological modelling and a comprehensive risk assessment will help to determine the best intervention for wildlife in any rabies outbreak.

110. Consultees identify a range of practical issues that need to be taken into account to ensure any vaccination programme is effective – the Government has well established contingency planning arrangements to ensure successful implementation of any vaccination programme but as part of ongoing contingency planning arrangements will review the comments that have been raised to ensure all factors are taken into account.

111. Government agrees with the circumstances identified by consultees under which vaccination may not be possible and will amend the Control Strategy accordingly to identify the limitations of this control method.

The Way Forward

112. Having considered the responses to this consultation, the Government will:

- Establish a Core Group for Rabies, to allow Government and key stakeholders to reach decisions on rabies disease policy and controls by mutual consent and contribute to joint policy-development in partnership. Members of the group will be selected for their knowledge of particular sectors and their standing with wider stakeholder organisations, but not as representatives of particular organisations.
- Produce a revised Rabies Control Strategy for publication in association with the Core Group, taking on board various suggestions and comments raised by consultees.

ANNEX: List of Consultees

- Animal Health & Veterinary Laboratories Agency
- Animal Welfare Network Wales
- Association of British Ports
- Association of Chief Police Officers
- Association of Chief Police Officers Cymru
- Association of Dogs and Cats Homes
- Association of Drainage Authorities
- Battersea Dogs and Cats Home
- Blue Cross
- British Airports Authority
- British Small Animal Veterinary Association
- British Veterinary Association
- British Veterinary Association Wales
- British Waterways (/new charity)
- Cat Protection League
- Country Land and Business Association
- Countryside Council for Wales
- Department of Health
- Department of Public Health & Health Professionals Welsh Government
- Dogs Trust
- Environment Agency
- Eurostar
- Eurotunnel
- Farming Union of Wales
- Food and Environment Research Agency
- Forestry Commission
- Health Protection Agency
- Highways Agency
- Kennel Club
- Local Government Association
- National Dog Warden Association
- National Farmers Union
- National Farmers Union Wales
- National Trust
- Natural England
- Network Rail
- Northern Ireland Assembly
- Passport for Pets
- Pet Care Trade Association
- Public Health Wales
- Royal College of Veterinary Surgeons
- Royal Society for the Prevention of Cruelty to Animals
- Scottish Government
- UK Borders Agency
- Welsh Local Government Association