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for Environment
Food & Rural Affairs



Llywodraeth Cymru
Welsh Government



The Scottish
Government

Review of the Non- Commercial Movement of Pet Animals Order 2011 (as amended)

Summary of responses

June 2017



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Introduction

This document provides a summary of responses to Defra's consultation on the review of the Non-Commercial Movement of Pet Animals Order 2011 (as amended). This consultation ran for 12 weeks, from 15 September until 27 October 2016.

Background

The Non-Commercial Movement of Pet Animals Order 2011 (as amended by the Non-Commercial Movement of Pet Animals (Amendment) Order 2014), herein referred to as the "2011 Order" is a domestic piece of legislation that sets out certain delivery and enforcement arrangements for implementing the EU pet travel scheme¹, commonly known as the 'Pet Passport Scheme', within Great Britain. The 2011 Order also links to other pieces of EU legislation that set out import protection measures against other diseases and parasites that can occur in pets, such as Highly Pathogenic Avian Influenza in birds and Nipah disease in cats and dogs.

However, the main purpose of the 2011 Order is to create a mechanism to facilitate the non-commercial movement of pet animals (cats, dogs and ferrets) into Great Britain without the need for quarantine, while protecting Great Britain from the threat of rabies and the *Echinococcus multilocularis* tapeworm.

Article 22 of the Order establishes a requirement that the Secretary of State completes a review of the 2011 Order within five years of it coming into force. To fulfil this statutory commitment, a report must be produced that:

- Considers if the 2011 Order has met its objectives;
- Assesses whether the objectives remain appropriate; and if so
- Explores the extent to which the objectives could be achieved in a less burdensome way.

The government's agreed approach to develop the evidence to inform such a report is to undertake a post-implementation review (PIR).

Defra conducted a public consultation to help inform the PIR. We were particularly interested in gathering views as to whether people believed the 2011 Order was delivering its intended results and if there had been any unintended consequences.

The consultation provided an opportunity for anyone with an interest in pet travel to supply Defra with their comments on the 2011 Order.

¹ The EU pet travel scheme itself is provided for in Regulation (EU) No 576/2013.

Summary of responses

A total of 90 responses to the consultation were received. It was possible for respondents to select more than one category when answering what group best described their personal interest in pet travel. The 90 respondents are summarised below:

	Total	Percent
Pet owner	47	52%
Veterinarian	31	34%
Pet Transport Carrier Employee	4	4%
Local Authority Officer	4	4%
Trading Standards Officer	4	4%
Member of pet animal/animal welfare organisation	13	14%
Other	18	20%

Response to Individual questions

The consultation document contained 33 questions, some with more than one part. Key points to emerge from the responses to each question are set out below together with a brief qualitative analysis of the responses.

Respondents rarely provided answers to every question; unless otherwise stated, figures quoted in this analysis are based on the number of actual responses to each specific question or part question, not on all 90 responses. Similarly, comments which were not relevant to the question are not included in the figures or qualitative analyses unless otherwise stated.

Part A – general questions

Question 6: If you are a pet owner, have you ever taken your pet abroad to another EU Member State?

36% said that they had taken their pet to another Member State.

We asked those who responded ‘yes’ to describe their experience of preparing their animal for travel and the pet checking process upon re-entering Great Britain.

The majority of respondents found the pet checking process easy, simple and straightforward. However, some did not find the process easy saying:

- Pet checks were time consuming, particularly when travelling via airports.
- Some vets had incorrectly completed pet passports, resulting in delays when pets returned to the UK.
- Entry routes into the UK were somewhat limited.
- EU veterinary treatment costs could be high, if required at short notice.

Some respondents believed that re-entry pet checks could be exploited, believing there were potential ways of bringing undeclared pets into the UK unchallenged. Six respondents advised they would like pets to routinely be allowed to travel in the cabins of aircraft.

Question 7: If you are a pet owner, do you travel internationally with your pets, i.e. beyond the EU?

9% of pet owners said that they travelled internationally with their pets.

We asked those who responded ‘yes’ to provide information on how easy or difficult they found the process for travelling with their animals.

Of the 12 responses to this part of the question, three respondents said they found the process easy and did not comment further. One respondent, who travelled with their cat from the USA, had found the airline transportation costs expensive and booking process complicated. Three respondents outlined that the requirement for their pets to travel as manifest cargo within an aircraft was prohibitively expensive and that this requirement also resulted in them being separated from their pets for long periods. A further respondent specifically commented that manifest cargo costs for pets were unfavourable compared to the costs of checked baggage.

Question 8: If you are a pet owner, do you travel frequently with your pet?

23% of pet owners said they travelled frequently with their pet.

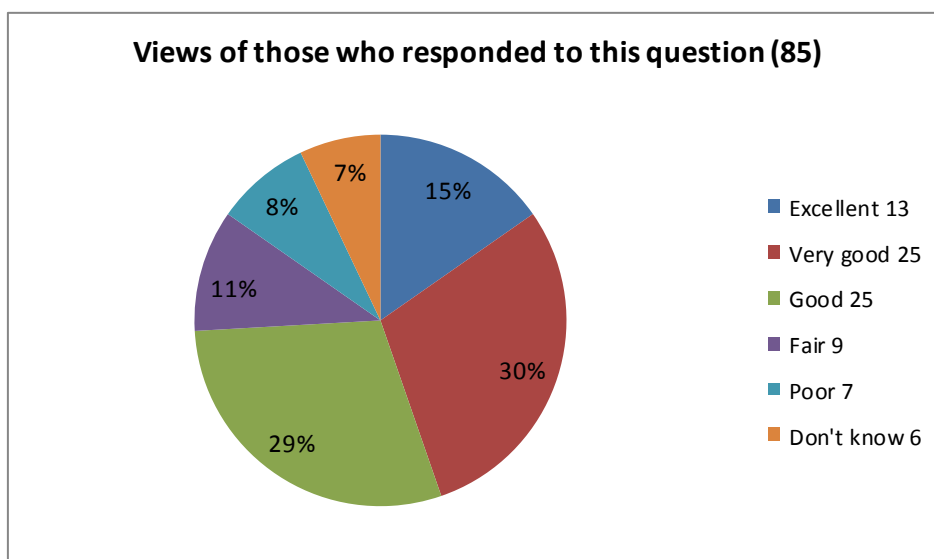
We asked those who responded ‘yes’ to outline their observations and experiences of how the current pet travel rules compare to those experienced before 1 January 2012.

There were 27 responses to this part of the question. All respondents who had travelled prior to 2012 said they found the process easier now. The following comments were mentioned:

- Once the requirements are known, the new pet travel rules were straightforward.
- It is beneficial that pets can now enter the UK at an earlier age because there is no longer a six month waiting period (after a successful rabies vaccination) for entry from EU Member States and listed third countries or a six month quarantine period on entry from unlisted third countries.
- Removal of the requirement for a rabies blood test (for pets entering the UK from EU Member States and listed third countries) made travel less complicated.

Three respondents said they now often travelled abroad with their pets, but would not have done so before the 2012 changes.

Question 9: 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?



74% of respondents rated the effectiveness of the 2011 Order at making it easier for pet owners to travel with their pet dogs, cats and ferrets as good, very good or excellent. 19% rated its effectiveness as poor or fair.

We asked people for supporting comments to justify their responses.

There were 40 responses to this part of the question.

The most frequent comments made by respondents who answered good, very good or excellent were that UK harmonization with the EU pet travel scheme had: made the overall process of travelling with pets simpler; reduced pet preparation waiting times; and resulted in lower costs. Extending the window for *Echinococcus multilocularis* tapeworm treatment from 24-48 hours to 1-5 days before (re)entry to the UK was also mentioned as a benefit as this had made undertaking short trips to EU Member States easier.

However, several respondents who answered in these three categories also qualified their answers by saying that although they felt the 2012 changes had made pet travel easier, they believed the changes may have also had undesirable effects. Some believed that harmonization had increased the risk of animal disease entering the UK, particularly through imported ticks. It was also argued that the changes had created an opportunity for underage puppies to be illegally imported for the purposes of trade (see below). Two Trading Standards Officers said that removing the six month rabies waiting period/quarantine had made it very difficult to assess whether young puppies that had entered the UK under the pet travel scheme were old enough to have been correctly vaccinated against rabies and so be compliant with the scheme's rules.

Of the respondents who rated the effectiveness of the 2011 Order at making pet travel easier as fair, two stated that they still found the pet travel rules complicated. Another two said that they would like pets to be allowed to travel in aircraft cabins.

The principle supporting comments made by those who answered poor surrounded concerns that the 2012 changes had made it easier for the pet travel scheme to be abused, particularly regarding people using it to transport animals, mainly puppies and kittens, from other EU countries into the UK for commercial purposes. Welfare organisations believed this was of serious concern and alleged that:

- Breeders and dealers were regularly bringing up to five puppies or kittens at a time into Great Britain under the guise of the pet travel scheme, but were then selling these animals upon arrival.
- The increase in the number of animals entering Great Britain following harmonization in 2012² could not simply be explained by more UK citizens deciding to travel with their pets; a significant proportion of these movements were thought to be for illegal trade purposes.
- Illegal movements were especially prevalent for dogs and puppies travelling from eastern Member States, such as Poland, Hungary, Lithuania and Romania.
- Undercover investigations by the Dogs Trust³ had revealed issues where puppies were failing to meet UK pet travel entry requirements (due to them being underage and/or not having appropriate rabies vaccination and/or *Echinococcus multilocularis* tapeworm treatment), which posed a risk for human and animal health.

² See figure 1 of Defra's Consultation on the Review of The Non-Commercial Movement of Pet Animals Order 2011 (as amended) (September 2016): consult.defra.gov.uk/exotic-disease-control/petorderreview/

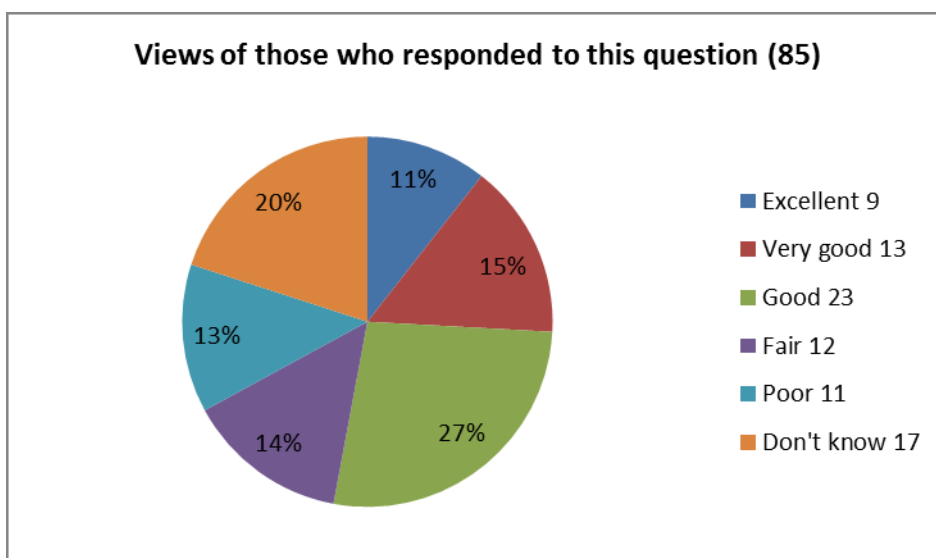
³ Dogs Trust (2014) – The Puppy Smuggling Scandal: www.dogstrust.org.uk/media-centre/puppy%20smuggling%20report%202014.pdf and Dogs Trust (2015) – Puppy Smuggling: The Scandal Continues: www.dogstrust.org.uk/puppysmuggling/final%20use%20this%20one%20puppy%20smuggling_2.8.pdf

- The same investigations had also discovered incidences where pet owners or vets in other EU Member States had fraudulently amended or issued pet passports with falsified data.

Some of the above issues were also reflected by respondents across all response categories. Two respondents also stated how they felt the pet travel scheme was being used to facilitate re-homing of “rescue” animals from abroad and that this should be stopped as the UK had a large pet abandonment/rehoming issue of its own.

Of the 12 vets who responded to this part of the question, six believed that the changes had increased the risk of importing rabies, non-native ticks and tick-borne diseases such as *babesiosis*. However, one vet pointed to the removal of six month quarantine as being beneficial from an animal welfare perspective.

Question 10: Based on your experience and/or understanding, how would you rate the effectiveness of the 2011 Order at making pet travel less expensive for pet owners?



53% of respondents said that the effectiveness of the 2011 Order at making pet travel less expensive was good, very good or excellent. 27% of respondents believed it had been fair or poor in this respect, while 20% did not know.

We asked people for supporting comments to justify their responses.

There were 53 responses to this part of the question.

Respondents who answered good, very good or excellent typically referred to the removal of rabies blood testing (for pets entering the UK from EU Member States and listed third countries) and tick treatment as being the main reason for their answer. One respondent advised that not having to pay for rabies serology testing had reduced the pet preparation costs by £100. A few respondents stated that it was now much easier for them to travel to both European and international dog shows and exhibitions, with one respondent

suggesting that harmonization had enabled pet owners from across Europe to attend the Crufts dog show because pet movement was much cheaper.

“Ferry ports in the summer are full of owners taking their pets with them to second homes or on holiday. It’s also easy for UK exhibitors to cross to continental dog shows, and many do.”

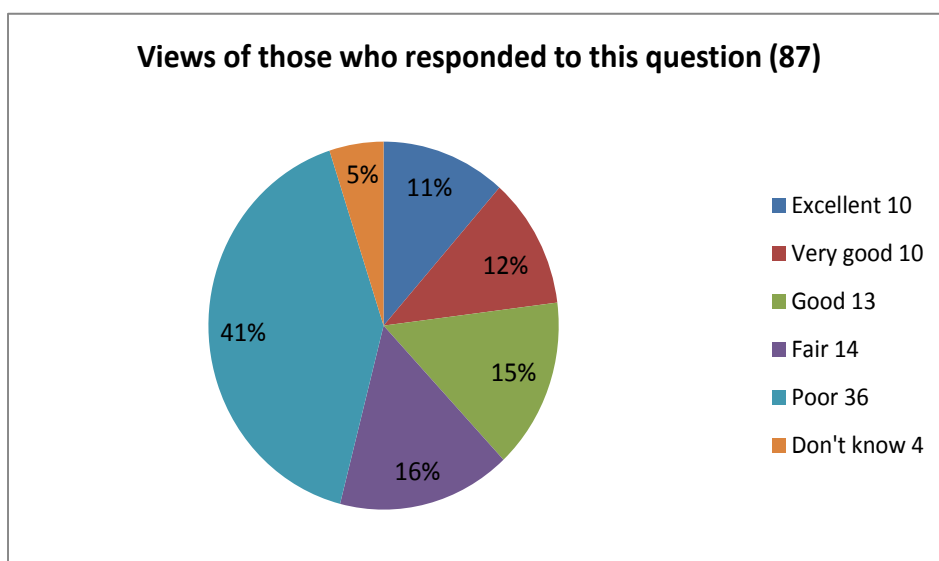
However, several respondents highlighted that actual costs incurred depended on which route of (re)entry into the UK was taken. For example, aircraft and airport handling charges could be very expensive when compared to travel by sea or rail.

Almost half of the respondents who commented that the effectiveness of the 2011 Order at making pet travel less expensive was fair felt that there should be more approved routes for (re)entry to the UK. Some stated that not allowing pets in aircraft cabins and the high costs of putting them in manifest cargo resulted in them having to use longer ferry journeys that were tiring for their animals.

Some respondents who answered poor gave the following reasons: the cost of obtaining a UK pet passport was high compared to some other European countries (some of which issue them free of charge); airfreight and handling costs were expensive; and Eurotunnel and veterinary charges (particularly in continental Europe) could be significant.

One respondent commented that while the 2011 Order had removed the need for tick treatment before a pet enters Great Britain, tick treatment is still recommended before travelling with pets to areas in which they may be exposed to ticks and tick-borne diseases, so there was no saving. They further noted that failure to apply tick treatments may save money in the short term, but should a pet contract a tick-borne disease actual costs could be greater in the long term if post-infection tick treatment was required.

Question 11: Based on your experience and/or understanding, how would you rate the effectiveness of the 2011 Order at protecting human and animal health against the risks of rabies and other animal diseases?



38% of respondents said that the effectiveness of the 2011 Order at protecting human and animal health against the risks of rabies and other animal diseases was good, very good or excellent. 57% of respondents felt it was fair or poor.

We asked people for supporting comments to justify their responses.

There were 71 responses to this part of the question.

Additional comments from those who thought the effectiveness was good, very good or excellent were that the 2011 Order gave them confidence that rabies and other disease protection controls were in place. Some responded by saying that the pet travel scheme requirements had been effective at preventing rabies, but that these were only effective if pet owners and vets complied with the regulations. One respondent stated that they believed there was scientific evidence to warrant a reduction in the 1-5 day *Echinococcus multilocularis* tapeworm treatment window to the pre-2012 levels of 24-48 hours.

A few respondents who answered fair stated that the 2011 Order had been successful at preventing rabies and the *Echinococcus multilocularis* tapeworm entering Great Britain and that it was crucial to retain these controls. Some respondents were concerned that border checks were insufficient to prevent hidden or underage pets entering the UK, potentially increasing animal and human disease risks. Many respondents also believed that the removal of mandatory tick treatment for dogs, cats and ferrets in 2012 could be linked to a notable increase in findings of European ticks in UK animals, with two respondents specifically referencing an ongoing UK study by Public Health England as evidence to justify this view.

The majority of respondents (40%) rated the effectiveness of the 2011 Order at protecting human and animal health as poor. The main supporting reasons were a belief that:

- People could conceal undeclared pets relatively easily at the UK border; such animals may not have had the necessary disease-prevention treatments and so present a risk.
- Large numbers of puppies were entering the UK below the minimum age limit of 15 weeks required under the pet travel scheme due to UK border staff being unable to accurately age animals and pet owners using pet passports that had either been issued falsely by veterinarians overseas or the content of which had been falsified afterwards.
- A 21 day wait period after rabies vaccination before a pet (re)enters the UK (from EU Member States and listed third countries) was an insufficient period of time for an animal to develop an effective immunity response.
- The removal of mandatory pet tick treatment had increased the risks that tick-borne diseases, such as *ehrlichiosis* and *babesiosis* and exotic ticks could enter Great Britain.

70% of the vets who responded to this question rated the effectiveness as poor. Most of these referred to the points listed above in support of their answer. In particular, there was broad agreement across vets that the 2012 removal of the requirement to have pet animals treated for ticks had led to documented incidents of exotic ticks and tick-borne diseases being reported, such as a cluster of canine *babesiosis* cases in Essex in March 2016. The majority believed that tick treatment should be reintroduced as many of the exotic ticks that had been identified were recognised vectors of animal and human infections, such as *ehrlichiosis*. Thirteen vets also stated that the pet travel requirements should be extended to cover canine *leishmaniasis* (chiefly caused by sand-flies), as the disease had been found in imported rescue dogs. Two vets further mentioned that UK pet travel legislation should also include measures to protect against *Angiostrongylus vasorum* (dog heartworm).

Welfare Organisations supplied details of associations between tick infestation and foreign travel. One referenced a 2016 study where 77% of pet dogs that had travelled abroad and which underwent a veterinary examination within two weeks of returning to the UK were found to be carrying ticks⁴. Typically, welfare organisations recommended that the 2011 Order should be amended to include: the reintroduction of tapeworm treatment for cats; mandatory tick treatment controls for cats and dogs; and that Defra explore potential measures to prevent the introduction of *leishmaniasis* into Great Britain.

Question 12: If you are a pet owner, what (if any) benefits has the 2011 Order provided to you personally over the last five years?

The majority of comments made by pet owners who responded to this question related to a view that the 2012 changes had made travelling to mainland Europe much easier for them, principally for the purposes of family holidays or exhibiting pet animals at international shows. The animal preparation process was thought to now be quicker, easier and less stressful. Some respondents commented that not having to quarantine animals meant that travelling with pets was cheaper, and so they could travel more frequently. This also avoided potential welfare issues that could result from pets being isolated in quarantine for long periods of time.

One respondent stated how the 2012 changes had saved them high costs of kennelling their pet in the UK (as they now take their pet away with them on holiday) and another said that they travelled frequently now, but would not have done so before.

There were many comments from cat and dog breeders to say that the reduction in pet preparation waiting times had made it more convenient for them to travel to mainland Europe to access new bloodlines, and so benefit the genetic health of British breeds. One cat breeder said that the reduction in minimum age for pet animals to enter Great Britain

⁴ Ticks infesting domestic dogs in the UK: a large-scale surveillance programme. Swaid Abdullah *et al* (7 July 2016): parasitesandvectors.biomedcentral.com/articles/10.1186/s13071-016-1673-4

had helped the socialization process as new kittens from mainland Europe integrated better with their existing animals.

A few respondents commented that they saw no benefits from the 2011 Order. These were mainly made by pet owners who did not travel outside of the UK with their pets. Comments included views that:

- It was more important to uphold animal welfare and protect human health than to make it more convenient and less costly for people to travel with their pets.
- Taking their pet abroad would risk exposing it to exotic disease risks.
- The 2012 changes had increased the risk that a travelled dog could transmit a disease that had either never been seen before in the UK, had been previously eradicated or, until recently, had been under control through vaccination programmes (such as canine distemper or parvo virus) to their (UK resident) dog.
- It could be difficult to find a vet in another Member State to administer any necessary pet travel health treatments before they returned to the UK.

Question 13: What do you perceive to be the benefits of the 2011 Order for wider society over the last five years?

There were 64 responses to this question. The majority (approximately two-thirds of responses) covered either one or all of the following (summarised) comments:

- Pet preparation was easier and less time-consuming for pet owners.
- Taking pets on holiday was easier; this enabled pet owners to avoid UK kennelling costs and periods of separation from their pets.
- Being able to enter Great Britain just three weeks after a pet had been vaccinated against rabies had provided EU citizens with greater freedom to visit Great Britain with their pets, either for recreational or employment (i.e. relocation) purposes.
- Pedigree pet breeders had been able to more easily access cats and dogs in other European Member States, so helping to improve the genetic diversity and health of UK breeds.

Many respondents commented that the changes had benefitted animal welfare because harmonization with the EU pet travel scheme had reduced the time that animals had spent in either quarantine or in boarding kennels, i.e. because of the removal of a six month waiting period (for pets entering Great Britain from EU Member States and listed third countries) and reduction of six months quarantine to a three month wait after a successful rabies blood test (for pets entering Great Britain from unlisted countries).

One respondent said that the changes had resulted in fewer animals being abandoned in rehoming centres overseas for situations where pet owners needed to relocate to Great

Britain quickly. Another respondent specifically stated that the 2011 Order had benefitted people with disabilities, who had been able to travel abroad with their assistance dogs more easily. Increased revenues from the tourism associated with EU citizens visiting the UK were mentioned by seven respondents.

Approximately a third of respondents commented that the 2011 Order had had negative effects on wider society. Most of these comments formed part of a wider response that also included a description of benefits. However, around 12 respondents believed that the 2011 Order had not had any benefits to wider society at all.

The negative feedback focussed on human and animal health and broadly fell into the following areas:

- A belief that harmonization had resulted in a significant increase in the number of non-compliant (underage) puppies entering Great Britain for the purposes of trade. These puppies had increased the risk of rabies or other zoonotic diseases entering the UK because such puppies may not have been rabies vaccinated (or if they had, may have been too young to develop a sufficient rabies immunity response) or treated for the *Echinococcus multilocularis* tapeworm.
- A belief that harmonization had resulted in a significant increase in the numbers of rescue dogs being imported into the UK for re-homing under the guise of the EU pet travel scheme. These dogs often had an unknown history and, as their health status was largely unknown, their entry had increased the risk of exotic diseases entering the UK, such as canine *leishmaniasis*, *ehrlichiosis*, and *babesiosis*.
- A belief that although it was now easier and quicker to bring pets into Great Britain, the 2012 changes had increased the risk of human and animal diseases being brought into the country because of the increasing number of animals (particularly dogs) that were entering Great Britain each year, i.e. the disease risks outweighed the benefits.

Two respondents also stated that illegal puppy imports had placed additional burdens on local authorities, who were responsible for enforcing instances of non-compliance with the 2011 Order.

Question 14: 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?

There were 39 responses to this question, two of which were from non-pet owners.

The most frequently cited costs were the financial costs associated with preparing a pet for travel, such as rabies vaccinations (and boosters), *Echinococcus multilocularis* tapeworm treatment and the cost of acquiring a pet passport. Two pet owners advised they travelled regularly to mainland Europe (five or six times a year) to attend pet shows with several animals, which resulted in total costs in excess of £1,000 to £2,000 a year. However, many

respondents described how the animal preparation costs were cheaper overall (and more beneficial) than the costs that they would have incurred travelling under the pre-2012 pet travel rules. One respondent who travelled regularly abroad with their pet believed that pet passports had too few pages, which resulted in them having to pay for a new pet passport for their animal every couple of years.

Several respondents felt that pet transport companies charged excessive fees for both carrying their animals and also for administering the pet identification checks.

A few respondents commented that locating an EU vet to administer health treatment to their pet before entering Great Britain had taken up time during their visit to Europe and also that EU veterinary costs could be expensive, compared to those within the UK. However, one of these respondents believed these were an acceptable trade-off for the ease of pet movement now available following harmonization with the EU pet travel scheme in 2012.

Non-monetary costs mentioned by respondents included the stress of wondering if their pet paperwork was correct (one respondent), the time spent queuing at pet passport checking points (one respondent) and a belief that the number of approved routes for pets to enter Great Britain was too limited, reducing flexibility of travel options (one respondent).

Question 15: What do you perceive to be the costs of the 2011 Order for wider society over the last five years?

There were 71 responses to this question.

Many respondents believed that the 2011 Order has resulted in an elevated risk of rabies, tick-borne diseases and other unknown exotic diseases entering Great Britain through pet movements. Reasons given to support these views were that:

- The reduced minimum age at which dogs, cats and ferrets can enter Great Britain (i.e. 15 weeks compared to 9 months previously) had opened up an opportunity for people to illegally import young puppies of “must have breeds” from Eastern European puppy farms to then be sold for commercial gain on arrival. Some vets, Trading Standards Officers and welfare organisations referred to personal experiences of finding non-compliant puppies which had failed to meet UK pet travel entry requirements due to the animals being underage and/or not having appropriate rabies vaccination and/or *Echinococcus multilocularis* tapeworm treatment. They believed this posed both a human and animal health risk to wider society in terms. Welfare organisations believed there were insufficient pet checking controls in place to prevent such non-compliant pets entering the UK.
- The 2012 suspension of mandatory tick treatment of pets before entering Great Britain had enabled non-endemic ticks to enter the UK. Some respondents cited cases where such ticks had been found on dogs that had not travelled outside of the country and to recent cases of canine *babesiosis* reported in Essex in March 2016. For this to occur, they argued non-native ticks must have been imported into

the UK on animal hosts and survived in their new local environment and that travelling pets could have caused this. Others thought that the removal of tick controls had increased the risk of serious zoonotic diseases, such as *ehrlichiosis* and *babesiosis*, occurring in Great Britain. The majority of vets who answered this question felt that mandatory tick treatment for travelling pets should be reinstated.

Many respondents felt that the increased numbers of young animals entering Great Britain as part of the illegal puppy trade (especially from Eastern Europe) had had negative consequences for animal welfare. These included potentially poor conditions being experienced during their transit and the impacts of puppies being inadequately socialized in their countries of origin before being sold. Both of which could lead to societal costs in terms of new owners needing to take sick animals to their vet for treatment and the potential development of later behavioural problems, such as aggression.

Several respondents believed the 2012 changes had created significant additional resource demands on local authorities and Trading Standards Officer in terms of supporting the costs of quarantining non-compliant animals and investigating/enforcing breaches of the pet travel legislation.

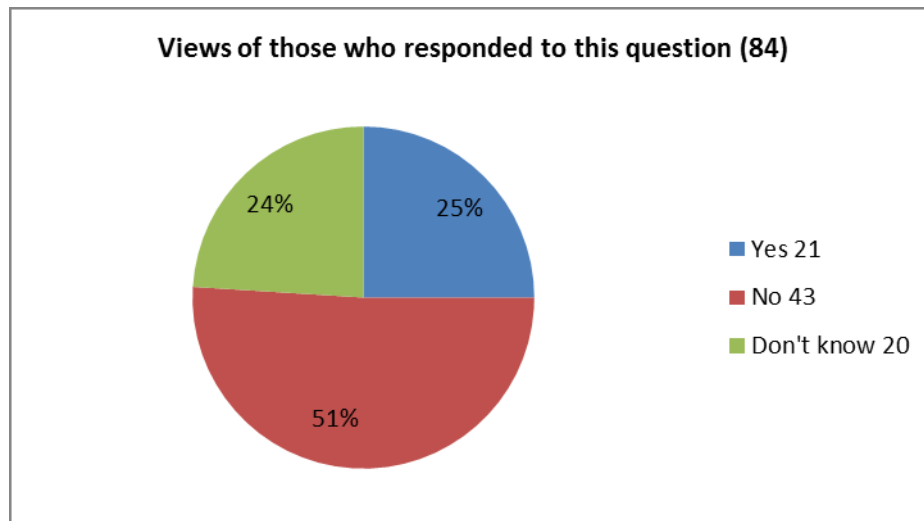
Some respondents commented that “rescue dogs” were now being moved into the UK from other European Member States under the guise of non-commercial pet movements. They believed this had created unhelpful competition for UK animal rescue centres who already found rehoming abandoned domestic pet animals difficult.

One respondent stated that the 2012 changes had resulted in a loss of business to UK quarantine establishments.

Question 16: It was anticipated that the 2011 Order would have the following effects:

- **Reduce the financial costs falling on pet owners undertaking non-commercial travel with their pet dogs, cats and ferrets outside the UK.**
- **Protect human and animal health against rabies and other animal diseases through proportionate disease control measures (i.e. rabies vaccination and *Echinococcus multilocularis* tapeworm treatment).**
- **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* unintended (i.e. not foreseen) effects or consequences?



We asked those who answered 'yes', to outline what these were?

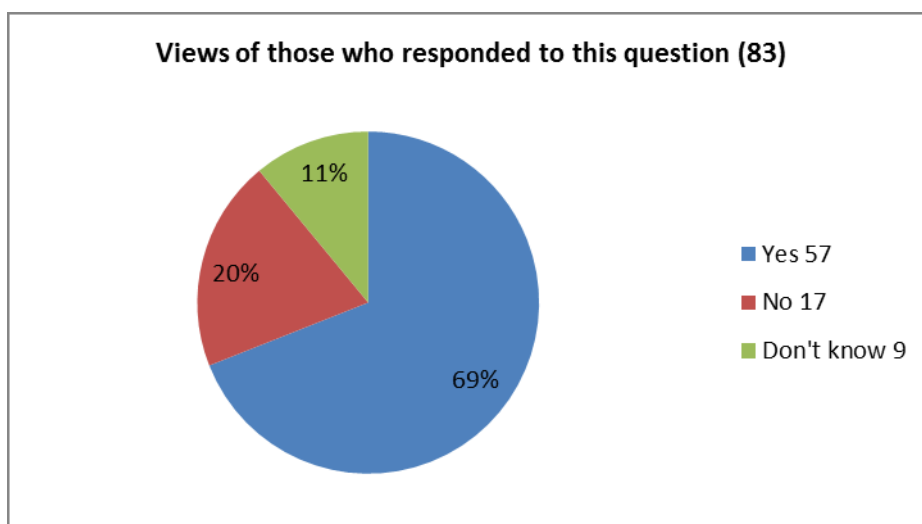
Positive unintended effects covered the following themes:

- It has become easier for pedigree cat and dog breeders to access different bloodlines present in Europe. This has enabled the UK gene pool to be widened, which has enhanced the genetic health of certain UK animal breeds.
- Some pet owners have saved the costs of kennelling their pets when they travel abroad as they now choose to take their animals with them, for example on holidays.
- Some pet owners said they were now visiting Europe with their pets more frequently (or for the first time) since 2012, which also benefitted them personally.

Question17: It was anticipated that the 2011 Order would have the effects listed below:

- **Reduce the financial costs falling on pet owners undertaking non-commercial travel with their pet dogs, cats and ferrets outside the UK.**
- **Protect human and animal health against rabies and other animal diseases through proportionate disease control measures (i.e. rabies vaccination and *Echinococcus multilocularis* tapeworm treatment).**
- **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 *negative* unintended (i.e. not foreseen) effects or consequences?



We asked those who answered 'yes', to outline what these were?

The following issues were identified by a significant number of respondents from across the following categories of respondent: pet owners, vets, pet owning organisations, local authorities and Trading Standards Officers. These are listed in the order of frequency of being mentioned, i.e. those most often at 1 and less often at 7.

1. **The illegal importation of puppies and (to a lesser extent) kittens:** Many respondents believed that the 2012 removal of a six month waiting period (after a successful rabies vaccination) for pets to enter Great Britain (from EU Member States and listed third countries) had created an opportunity for dealers to move young puppies and kittens into Great Britain for the purposes of commercial trade. Several respondents believed that the large increase in numbers of pets entering Great Britain since 2012 could not be explained by genuine pet movements alone. They considered that the non-commercial pet travel scheme was now being widely abused for the purposes of commercial pet movements, particularly of young puppies of “designer” breeds which were often in short supply and/or very expensive to purchase from UK breeders. Several respondents cited investigations by the Dogs Trust and RSCPA⁵ that had revealed instances of underage puppies entering Great Britain from the EU, either by using falsified pet passports or by avoidance of pet carrier identification checks. A few respondents stated that vets and pet carriers were unable to accurately determine the age of these puppies, which made taking enforcement action difficult.

“The ability to bring in puppies at a much younger age appears to have opened up a significant cross border commercial trade in puppies...”

⁵ Dogs Trust (2014) – The Puppy Smuggling Scandal: www.dogstrust.org.uk/media-centre/puppy%20smuggling%20report%202014.pdf; Dogs Trust (2015) – Puppy Smuggling: The Scandal Continues: www.dogstrust.org.uk/puppysmuggling/final%20use%20this%20one%20puppy%20smuggling_2.8.pdf; and RSPCA (2016) – Sold a Pup?: rompetid.ro/files/downloads/utile/PuppyTradeReport-2015.pdf

2. **A heightened risk of rabies and the *Echinococcus multilocularis* tapeworm entering Great Britain:** Many respondents thought that large numbers of underage pet animals were entering Great Britain and that there was uncertainty whether these animals had been adequately treated against rabies or the *Echinococcus multilocularis* tapeworm. Some respondents felt that many of these animals either did not have the preventative health treatments at all (but their pet passports had been falsified to indicate they had) or, if they did, it was possible that the rabies vaccination could have been administered at too young an age to guarantee that an animal had mounted a sufficient immune response to provide disease protection. Several respondents felt that this uncertainty had elevated the risk of rabies and the *Echinococcus multilocularis* tapeworm entering the UK to an unacceptable level.
3. **An increased risk of ticks and exotic tick-borne diseases entering Great Britain:** Many respondents commented that the 2012 removal of mandatory tick treatment prior to pets entering Great Britain combined with the growth in total numbers of pet movements over the last five years had significantly increased the risk of non-native ticks and tick-borne diseases (some potentially zoonotic) entering the country. 56% of vets specifically believed that tick-related diseases such as *ehrlichiosis* and *babesiosis* now formed a more serious threat to the UK.
4. **Animal welfare consequences of the illegal trade in puppies:** Many respondents alleged that the illegal importation of puppies (under the pet travel scheme regime) was inadvertently supporting puppy farms in overseas countries where welfare standards for animal breeding, husbandry and transport were of dubious quality. A few respondents commented that the stricter animal welfare requirements set out in UK and EU animal trade legislation (The Trade in Animals and Related Products Regulations 2011⁶ and European Council Directive 92/65/EEC⁷, respectively) were being avoided, with potential negative consequences for the health of pet animals.
5. **Increased pressure on local authorities and Trading Standards resources:** Some respondents felt that the growth in total numbers of pet movements over the last five years had been so high that this had placed considerable pressure on local authority budgets. They believed the increasing numbers of illegally-landed animals was placing unforeseen costs on local authorities. Specific costs mentioned were the costs of quarantining seized animals (and local authorities may not always be able to reclaim these, for example in situations where a pet owner abandons an animal) and also the costs of mounting enforcement cases into potential non-compliance.

⁶ www.legislation.gov.uk/ukxi/2011/1197/pdfs/ukxi_20111197_en.pdf

⁷ eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:1992L0065:20040703:EN:PDF

6. **Use of the non-commercial pet travel scheme to import “rescue” animals:**
Some respondents stated they knew of cases where animal charities were incorrectly using the non-commercial pet travel scheme to bring stray cats and dogs from Europe into Great Britain. This issue was believed to have markedly increased due to the pet entry requirements becoming easier, cheaper and quicker than prior to 2011. A few respondents also commented that these animals presented a health risk as they could be carrying disease, such as *leishmaniasis*, heartworm (*Dirofilaria immitis* and *Angiostrongylus vasorum*) and diseases associated with ticks, such as *ehrlichiosis* and *babesiosis*, not normally encountered in the UK.
7. **A reduction in numbers of quarantine establishments in the UK:** Three respondents believed the introduction of the 2011 Order had led to a significant reduction in the number of quarantine premises in the UK. While this was seen as a normal response to reduced demand, these respondents argued that this could leave the UK with insufficient capacity to draw upon in the event of an animal disease outbreak that required use of quarantine facilities.

We also asked respondents to advise how these unintended negative effects could have been avoided?

Very few respondents provided comments on how the above issues could have been addressed. A summary of the main suggestions identified follows:

- **The illegal importation of puppies and (to a lesser extent) kittens:** This could have been avoided by:
 - Retaining the pre-2012 rabies vaccination regime and so only permit older animals to travel. Some respondents indicated this would have enabled a lay person (such as a pet carrier checker) to easily tell the difference between an underage (non-compliant puppy) and an older (compliant) grown dog, thereby making enforcement action easier.

[Defra note: due to the expiry of the UK’s rabies derogation (which permitted the UK to apply different rabies controls compared to other EU Member States) on 31 December 2011, the UK was legally obliged to harmonize with the rabies requirements in EU pet travel scheme Regulation (EC) No 998/2003 from 1 January 2012. Therefore retaining the UK’s previous rabies vaccination regime policy was not a viable option.]

- More robust scrutiny of pet travel documentation combined with physical checking of animals by pet carriers to establish their microchip identities and compliance with pet travel rules.
- Restricting the number of pet animals that can travel to Great Britain to five animals per consignment, rather than five animals per person travelling (to help prevent bulk shipments of puppies and kittens).

- Requiring a signed declaration from the person travelling with a pet animal to confirm that they are conducting a non-commercial movement.
 - Introducing “on the spot fines” to act as a deterrent, plus increased penalties for not complying with the requirements of the 2011 Order.
 - Increasing enforcement officer resourcing at border entry points (especially during out of hours periods).
 - Introducing monitoring of the number of pets brought into Great Britain by individual “pet owners” to enable pet carriers and enforcement agencies to identify suspicious behaviour for follow-up, such as an individual bringing in multiple shipments of five puppies.
- **An increased risk of ticks and exotic tick-borne diseases entering Great Britain:** This could have been avoided by not withdrawing mandatory tick treatment requirements.
 - **Use of the non-commercial pet travel scheme to import “rescue” animals:** This could have been avoided by:
 - Stronger enforcement of the 2011 Order legislation, i.e. pet carriers more often challenging suspected “rescue animal” movements occurring under the non-commercial pet travel scheme.
 - Clearer advice being provided to prospective British owners of foreign rescue dogs that they should comply with commercial pet movement rules.

Question 18: We asked whether our 2011 policy impact assessment assumptions about the typical costs that could apply to pet owners travelling with their pet dogs, cats and ferrets under the EU pet travel scheme were still appropriate today?

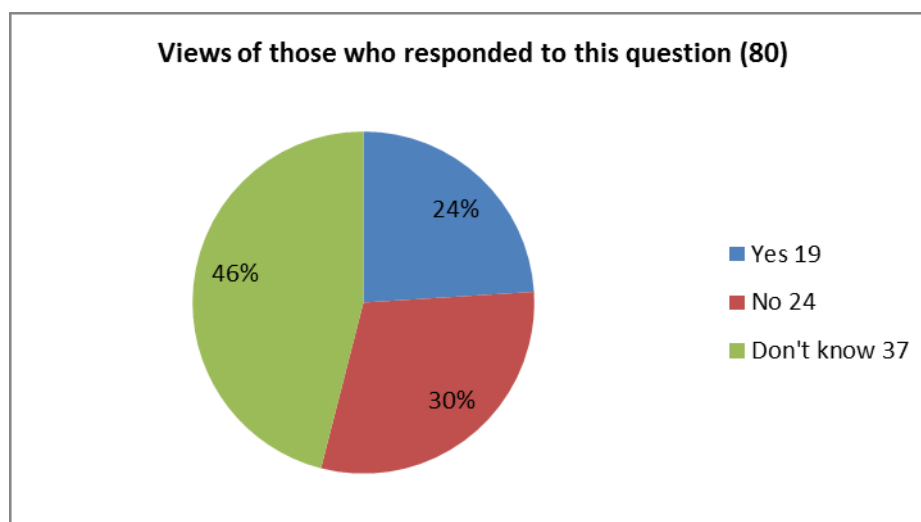
41% of respondents agreed that Defra’s 2011 cost assumptions were still appropriate today, 30% either did not know or chose not to answer the question and 29% believed the 2011 cost assumptions were now inaccurate.

Those who answered “No” provided a range of estimated costs, the averages of which are shown in the table over the page.

Several respondents stated that effective tick and tapeworm treatment varied, depending on the size of the animal being treated. Four respondents commented that the costs of tick treatment could cost several hundred pounds in the case of an animal infected with a tick-borne disease, since this may require diagnostic testing in addition to treatment, which would cost several hundred pounds.

	2011 Defra impact assessment average cost assumption	2016 consultation feedback estimated costs (averaged)
Rabies blood test	£75	£98
6 month quarantine	£1,500 - £3,000	£2,600
Microchip implantation	£33	£14
Boarding kennels	£12 per day	£14 per day
Tick treatment – (cost if animal is infected)	£50	£67
Tapeworm treatment – (cost if dog is infected)	£10	£18
Rabies vaccination	£41	£42
Tick / tapeworm treatment – (cost of preventative treatment)	£12 per year	£28

Question 19: Have there been any additional costs of the 2011 Order (not captured previously) on small and micro businesses? If yes, what are they?



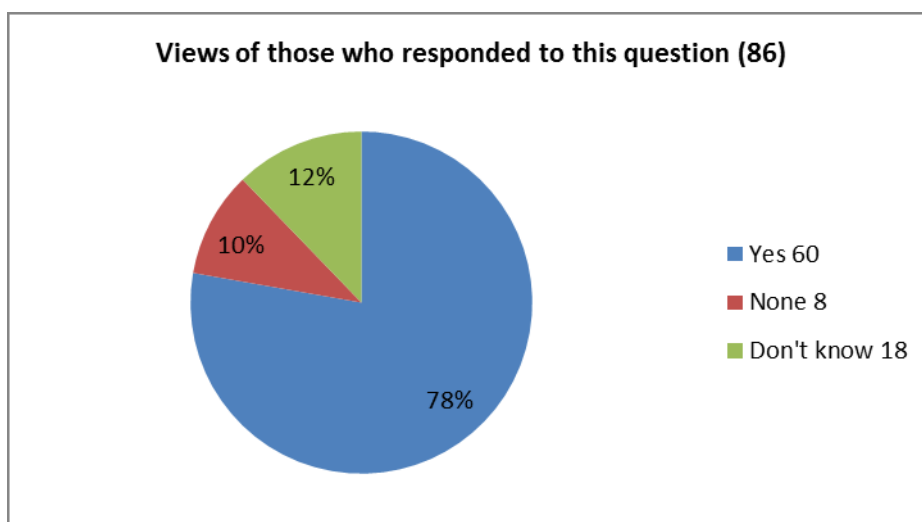
24% of respondents believed that the 2011 Order had placed additional costs on small and micro businesses. The main comments given in support of this view were:

- Impact on British dog breeders:** Some respondents believed that abuse of the pet travel scheme to illegally import young puppies for sale (either at the pet travel scheme minimum entry age requirement of 15 weeks or as underage animals) had undercut the prices of British dog breeders. Some further mentioned that British

breeders also had to comply with UK animal welfare standards, which may be stricter than that found in the Member States where these puppies originated from.

- **Impacts on animal welfare and rescue organisations:** Several respondents stated that the illegal movement of puppies and kittens into Great Britain for commercial purposes had placed extra pressure on the resources of animal rescue charities in caring for an increased number of abandoned animals. Respondents believed a significant number of animals had been taken by their British owners to such rehoming centres after they discovered their imported pet had behavioural problems (potentially due to poor breeding and/or lack of socialization training) or poor health (which required costly veterinary treatment). This had created additional costs for these organisations in terms of providing the animals with shelter, veterinary treatment and the time required to try to find them suitable new owners.
- **Costs on British vets:** A couple of respondents believed that because the 2011 Order had increased the number of requests being made to authorised veterinarians to issue pet passports, this had resulted in more vets having to be trained (or retrained) to accommodate demand. One respondent also stated that more vets had chosen to be vaccinated against rabies themselves (at an extra cost) due to the increased risk of encountering a pet with rabies that had entered Great Britain under the pet travel scheme.
- **Loss of business to private quarantine kennels:** One respondent stated that the decreased demand for UK pet quarantine facilities had had a significant economic impact on these businesses.
- **Loss of income to rabies blood testing laboratories:** One respondent mentioned this.

Question 20: The 2011 Order facilitates delivery of EU pet travel scheme Regulation (EU) No 576/2013 within Great Britain. Within the constraints of that Regulation, do you believe the 2011 Order could be refined to simplify its scope or improve its effectiveness at delivering pet travel?



78% of respondents who answered this question believed that refinements could be made.

The majority of comments made by these respondents did not relate to the content of the 2011 Order itself, but instead related to potential improvements that people believed could be made to EU pet travel Regulation (EU) No 576/2013. As highlighted in our original consultation document, a review of the EU pet travel Regulation is beyond the scope of Defra's five-year post-implementation review of the 2011 Order. However, for completeness a summary of both sets of comments is provided below.

Comments relating to aspects of the 2011 Order (domestic) legislation

- **Tackle the illegal importation of puppies and (to a lesser extent) kittens by:**
 - Conducting stronger checks at border entry points on pet animals entering Great Britain. Many respondents stated there should be more robust scrutiny of pet travel documentation by pet carriers and/or enforcement bodies, together with the physical checking of animals to attempt to overcome any fraudulent activity relating to microchip identification. Some respondents believed that pet carriers, pet checkers and Border Control Officers should receive enhanced mandatory training surrounding the pet checking process and illegal movement issues to support this (such as receiving guidance on how to accurately assess the ages of animals).
 - Increasing enforcement body and government agency resources at UK border entry points.
 - Transferring responsibility for the pet checking process from pet carriers to government agencies.
 - Introducing “on the spot fines” (Fixed Penalty Notices) to act as a deterrent.
 - Increasing the penalties for not complying with the requirements of the 2011 Order.
 - Amending the Non-Commercial Movement of Pet Animals Order 2011 to modify the Rabies (Importation of Dogs, Cats and Other Mammals) Order 1974 so that pet animals travelling under the EU pet travel scheme that have been detained by local authorities due to non-compliance with EU pet travel scheme rabies vaccination requirements can enter into local authority ownership should their owner not meet the costs of quarantine. It was felt this could speed-up the length of time taken to resolve such cases as currently local authorities can only destroy such animals or try to claim their quarantine costs via civil debt, which is a time consuming and resource intensive process (and cost burden to the tax payer).
 - Giving local authorities additional legislative powers. Some local authority respondents believed it would be highly valuable for local authorities to have

powers under the 2011 Order to enter a domestic residence which their officers had reason to believe contained an illegally-landed pet. This would save the time otherwise needed to apply to a Magistrates Court for a warrant to give them permission to do so (if voluntary entry was refused), during which such non-compliant animals could easily be removed without trace.

- Creating a centralised database to record pet passport, microchip and movement data for all pets entering Great Britain. Some respondents felt this would support better monitoring of pet movements and so help identify possible fraudulent activity.
 - Introducing monitoring of the number of pets being brought into Great Britain by individual “pet owners” to enable pet carriers and enforcement agencies to identify suspicious behaviour for follow-up, such as an individual bringing in multiple shipments of five puppies.
- **Increase the number of “approved routes” (seaports and airports through which pet owners can bring their pets into Great Britain.**
 - **Allow aviation pet carriers to have the option to permit pet owners to travel with their pets in the cabins of aircraft, rather requiring that pets only travel as manifest (hold) cargo.**
 - **Decrease the numbers of foreign stray/“rescue” dogs and cats entering the UK for rehoming.** Some respondents suggested this could be achieved by targeting rescue charities with training, information and advice provision, for example to highlight how the non-commercial pet travel scheme must not be used to bring rescue animals into Great Britain, but instead the commercial pet movement rules under The Trade in Animals and Related Products Regulations 2011⁸ should be followed. A few respondents wanted such movements banned altogether as they believed the UK had a large number of pet animals that need rehoming already and that rescue animals from abroad risked potentially bringing exotic diseases/parasites into the country.
 - **Include additional pet disease control and vaccination requirements.** A few respondents believed that disease controls to protect Great Britain from *leishmaniasis* should be included in the 2011 Order, while one respondent suggested that vaccination against canine distemper, parvo virus and kennel cough in dogs, and vaccination of cats with the RCP Feline Leukemia Virus (FeLV) should also be compulsory.
 - **Permit the entry of pet animals travelling on board private boats.** An organisation representing private boat owners felt that the pet travel legislation

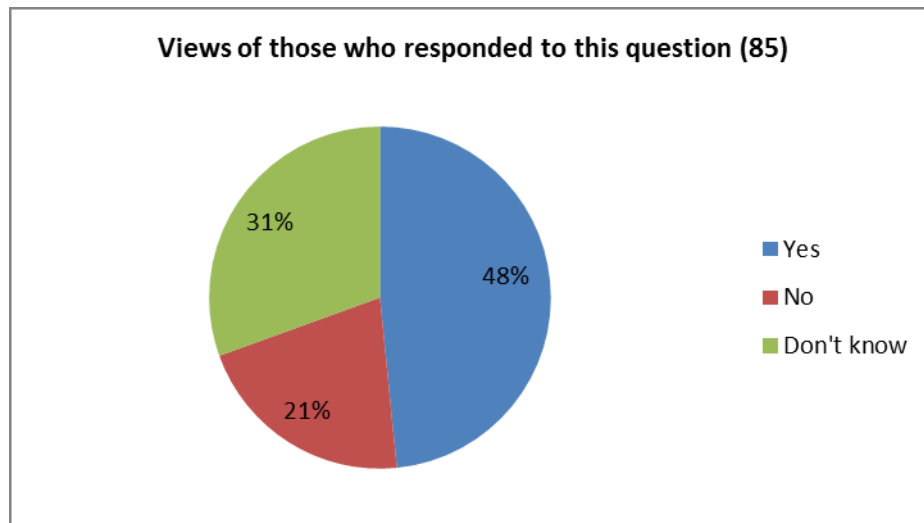
⁸ www.legislation.gov.uk/ukxi/2011/1197/pdfs/ukxi_20111197_en.pdf

could be improved by allowing private boat owners to land their pet animals in the UK via specified ports, where the relevant pet checks would then be undertaken. (This is only currently permitted for private boats arriving from Ireland.)

Comments relating to aspects of the European Union pet travel scheme Regulation (EU) No 576/2013

- **Reinstate tick treatment controls on pet animals entering Great Britain.** 22 respondents (including 52% of veterinarians) wanted to see the pre-2012 EU derogation allowing the UK to require mandatory tick controls to be reinstated.
- **Reintroduce rabies blood-testing (which should reveal a satisfactory rabies antibody titration level) and waiting period before a pet cat, dog or ferret can enter the UK.** 12 respondents commented that they would like a six month waiting period reinstated. Some supported this view by stating their belief that blood testing was the most secure way of preventing animals with rabies entering the country.
- **Increase the minimum age at which pet animals can enter the UK to six months.** 11 respondents felt this could effectively tackle the illegal trade in puppies and kittens, since pet checkers and border control officials would easily be able to distinguish whether an animal was underage (and therefore non-compliant) or not. This could either be a rule in its own right or brought about by reintroducing rabies blood testing (as above) and an appropriate waiting period.
- **Restricting the number of pet animals that can travel to Great Britain.** A few respondents suggested the current limit of five pet animals per person travelling was too high, and that this should be lowered to either a total of five pets per consignment or two or three pets per person (to help prevent bulk shipments of puppies and kittens).
- **Requiring a signed declaration from the person travelling with a pet animal to confirm that they are conducting a non-commercial movement.** One respondent.
- **Shortening the window for treating pet dogs against the *Echinococcus multilocularis* tapeworm before entering the UK from 24-120 hours to 24-48 hours (as required before 2012).** Two welfare organisations argued that the larger the treatment window, the greater the risk of a treated pet being (re)infected with the tapeworm. Two welfare organisations also supported the introduction of tapeworm treatment for cats. However, some respondents were in contradiction to these viewpoints, instead suggesting that tapeworm treatment should be either dropped (one respondent) or should only need to be administered to UK-resident pet dogs at regular intervals throughout a year, i.e. and not every time these animals returned to the UK from a trip out of the country (three respondents).

Question 21: Are there any 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.



48% of respondents felt that additional non-legislative measures could help increase compliance with the pet travel scheme rules. The most frequent comments made to support this view concerned the provision of more guidance and publicity (in terms of both quality and availability) and training. For example:

- Clearer guidance to pet owners on what their responsibilities are under the 2011 Order and pet travel scheme Regulation (EU) No 576/2013, including setting out both mandatory animal health treatments and what other non-mandatory health treatments they could consider giving to their pet, based on exposure risks from the country they are visiting. Two respondents suggested that publishing a 'Final pet check-list' would be useful to help British pet owners overcome any uncertainty about what requirements must be met in order for their pet to have trouble-free access back into the UK.
- More information to be made available at veterinary practices, sea and air ports, British embassies and on pet-owning organisation websites – to promote increased awareness of the pet travel scheme and its rules.
- Clearer and more user-friendly guidance and advice to (prospective) pet owners, animal "rescue" organisations and pet traders about the differences between a "non-commercial" and "commercial" pet movement and the rules applicable to each – to help reduce the number of dogs and cats incorrectly entering Great Britain for re-homing purposes under the pet travel scheme. One welfare organisation believed that while the information on pet travel available on the gov.uk website was clear and easily accessible, the corresponding information on commercial pet imports of cats, dogs and ferrets was less so and could be made more user friendly.

- Increased veterinary training on the requirements of the EU pet travel scheme and on the correct procedures for completing pet passports – to help prevent administration errors that may cause delays and non-compliance issues when pet owners attempt to return to Great Britain with their pets. This was suggested by several respondents. One respondent suggested that familiarization with pet travel scheme requirements should form a distinct area of competence within the Royal College of Veterinary Surgeons (RCVS) Code of Professional Conduct for Veterinary Surgeons.
- Provision of better education to pet checkers, Border Control Officials and port and local authorities to ensure that they have adequate knowledge and experience to estimate the ages of puppies being transported – to reduce illegal puppy imports by identifying underage (non-compliant) movements before travel or licensing them into quarantine.

Some other responses suggested:

- Pet checking should be carried out by the government's Animal and Plant Health Agency (APHA) or Border Force UK (the UK's statutory border control agency), rather than pet carriers.
- Pet checks should always be undertaken before pets are allowed to leave Great Britain – to help identify potential non-compliance issues in advance.
- Increased APHA spot checks at entry points, such as Dover and Holyhead – to ensure animals are pet travel scheme compliant. This should include vehicle checks to help deter pet dealers who may be transporting large numbers of undeclared animals.
- Defra to provide clear advice to local authorities as to what constitutes “reasonable” evidence that an animal has been illegally imported and when it needs to go into quarantine. All ports should have facilities for the temporary detention of animals.
- A multi-agency strategy should be developed to tackle illegal puppy imports whereby intelligence is shared between government agencies, pet transport carriers, Border Control Officers and enforcement authorities.
- Local authority staff to be available (or on call) to investigate reports of non-compliant animals 24 hours a day, i.e. not just during office hours.

Question 22: Do you believe that the 2011 Order is still required?

Over three quarters of respondents stated that they believed the 2011 Order is still required.

Response	Number of respondents	Percent
Yes	69	77%
No	10	11%
Don't know	8	9%
Not answered	3	3%
Total	90	100%

The following principle reasons were given by those who provided comments to support their response:

- To safeguard Great Britain against pet diseases – this protection is fundamental so there continues to be a requirement for defined procedures in domestic legislation.
- To continue to enable pet owners to have the choice and freedom to take their pet dogs, cats and ferrets abroad without excessive costs and inconvenience.

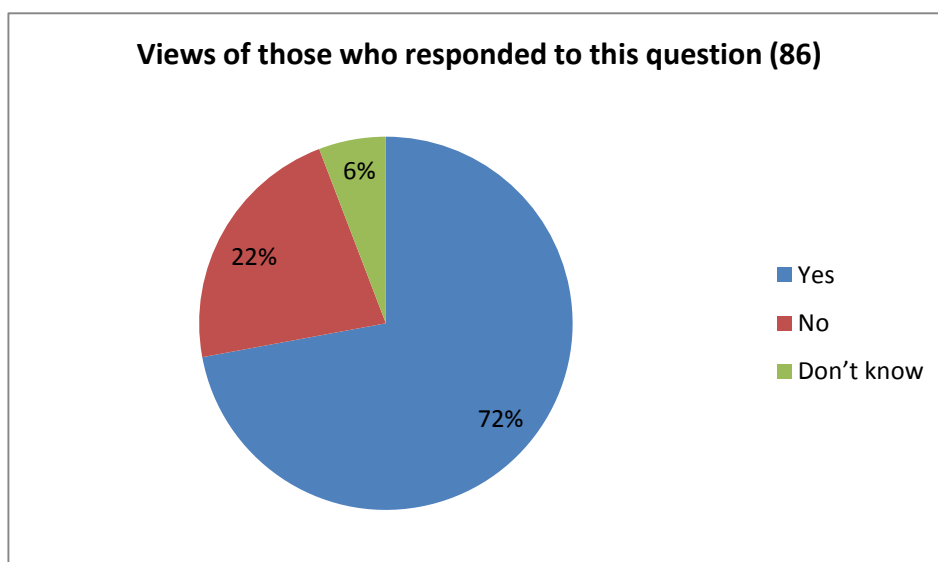
Many of these respondents went on to comment that the 2011 Order could, however, be improved, such as by increasing the level of fines and enforcement options available in situations where animals were found to be non-compliant, and through requiring stronger pet checks for animals entering the country.

Of those who answered no and provided comments: one respondent stated that the domestic pet travel legislation⁹ in place before 2012 should be reinstated; one respondent believed there should be greater freedom of movement (and no pet checks at all); and several believed the 2011 Order should be strengthened to reduce the potential risk of animal disease entering the UK through non-compliant pets.

⁹ See The Non Commercial Movement of Pet Animals (England) Regulations 2004: www.legislation.gov.uk/uksi/2004/2363/contents

Part B – specific 2011 Order questions

Question 23: 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?



72% of respondents agreed that a maximum four month quarantine period remained appropriate for pet dogs, cats and ferrets that had not met the rabies vaccination requirements of 2011 Order, i.e. for animals that have not had, or are unable to have, either a rabies vaccination and 21 day wait before entering Great Britain (for EU and listed countries) or a rabies vaccination, blood test and three month wait before entering Great Britain (for unlisted third countries).

Of those who responded yes, one welfare organisation respondent supplied additional comments that although the average incubation period for naturally-occurring rabies in dogs, cats and ferrets varied depending on which scientific assessment was referenced, they felt that the majority of rabies cases in such animals would present within four months and so it was thought this was still an appropriate quarantine period.

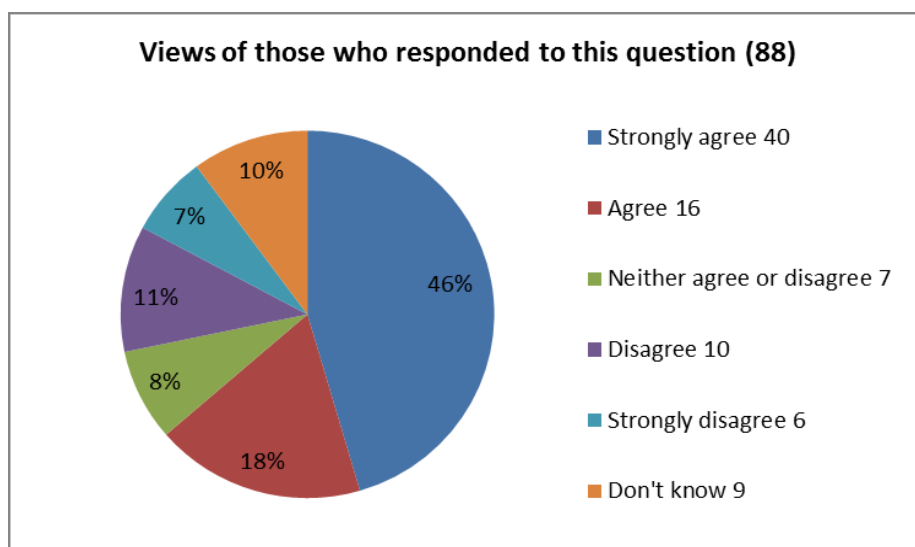
Of the 22% of respondents who answered no, it appears that a few respondents were confused by the question as their comments indicated they believed that quarantine was no longer necessary for pet travel at all. This may have been avoided by our consultation more clearly explaining that quarantine is still a possible (and necessary) option for situations where pet animals are discovered during the pet checking process not to have had satisfactory rabies preventative health measures or where this is not possible, for example if a pet owner needs to urgently relocate with their animal to Great Britain and the pre-entry waiting periods cannot be accommodated. In these cases, an animal will need to remain in isolation in quarantine in Great Britain until such a time as when rabies

prevention requirements as set out in Article 6(b) or Article 10(b) and (c) of pet travel Regulation (EU) No 576/2013 have been met¹⁰, or a four month period has elapsed.

Other respondents who answered no gave mixed comments to support their answer, including a belief that:

- Four months quarantine is an excessive period; three months should be sufficient (two respondents).
- The quarantine period should be based on the age of a pet: it should be focussed on puppies/young dogs and older dogs should not be subjected to a four month maximum period (one respondent).
- The quarantine period should be increased to six months because it had been shown that rabies incubation can take longer than four months (seven vets).
- The quarantine period should be based on individual animal risk assessments (two respondents).
- Ferrets should be quarantined for six months due to a lack of scientific data concerning rabies in these animals.

Question 24: 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. To what extent do you believe that current tapeworm controls should be retained?



¹⁰ See: eur-lex.europa.eu/legal-content/EN/TXT/?qid=1443699553206&uri=CELEX:32013R0576

64% of respondents either agreed or strongly agreed that mandatory *Echinococcus multilocularis* tapeworm treatment should be retained.

Several respondents justified their response by stating that the tapeworm would pose a serious risk to both human and animal health if it entered the UK, plus it was important to protect the UK from the tapeworm as its incidence appeared to be increasing across continental Europe. One organisation believed that the control measures were still necessary to prevent the tapeworm from entering the UK fox population, which could then pose a risk to people and dogs who routinely work in the countryside, for example farmers and those involved in managing shooting estates. A further respondent cited how, even with advances in health treatment, the long term prognosis for people infected with Alveolar echinococcosis (contracted by ingesting eggs shed by the tapeworm) is poor and another stated that keeping the tapeworm out of the UK was even more important than preventing the entry of rabies.

It was suggested that pet dog owners should receive better education on the potential consequences to human health and costs on the NHS if the tapeworm were to become established in the UK¹¹, since many were not aware of the seriousness of this parasite. A further benefit of tapeworm treatment mentioned by a vet was that the treatment also provided some protection for pet dogs against the *Echinococcus granulosus* (“hydatid worm”) tapeworm, which is already present in certain parts of the UK.

Although not within scope of the 2011 Order itself, six vets and animal welfare organisations believed that the current 24-120 hour (1-5 day) time period for administering *Echinococcus multilocularis* treatment before entering the UK should be reduced to 24-48 hours (as required by the pre-2012 UK pet travel scheme). This was felt necessary to provide even more protection against the potential risk of a treated dog being re-infected with the tapeworm before it travelled to the UK. Three respondents said that pet cats should also be required to have *Echinococcus multilocularis* worming treatment, even though it was believed the risk of cats contracting the tapeworm was less than that of dogs.

Comments raised by those who disagreed, strongly disagreed or neither agreed or disagreed with retaining current tapeworm controls tended to focus on concerns about repeatedly giving an animal praziquantel, the medicinal product contained within approved tapeworm treatments. Some pet owners, who travelled frequently to Europe to attend dog shows (4-6 times a year) suggested that there should be a maximum number of times that regularly travelling pets should be treated, such as perhaps two or three times a year.

¹¹ Defra’s original 2011 Impact Assessment into the 2012 UK pet travel scheme changes included a 2008 Health Protection Agency estimate of the cost of long-term care per human case of Alveolar echinococcosis as £95,400. See: consult.defra.gov.uk/exotic-disease-control/petorderreview/supporting_documents/111005%20%20NCMPAO%20Impact%20Assessment%20%20Original.pdf

Two respondents suggested that the tapeworm controls should be reviewed using the latest information available from drug companies about the clearance of praziquantel from pet body systems and the expected duration of efficacy of the treatment.

Question 25: The government’s decision in 2012 to retain *Echinococcus multilocularis* tapeworm treatment for pet dogs (re)entering Great Britain under the EU pet travel scheme was based on the following key assumptions:

- Incidences of the *Echinococcus multilocularis* tapeworm were increasing across continental Europe; and
- It was assumed that the tapeworm is likely to become permanently established if it should enter the UK.

Do you believe these assumptions are still appropriate today?

Response	Number	Percent (%)
Yes	68	76%
No	6	7%
Don't know	13	14%
Not answered	3	3%
Total	90	100%

Many of the respondents who answered yes and supplied further comments referred to scientific research papers and reports¹² to justify their view that the above assumptions are

¹² European Food Safety Authority (EFSA) – Assessment of *Echinococcus multilocularis* surveillance reports submitted in 2015 in the context of Commission Regulation (EU) No 1152/2011 (November 2016): onlinelibrary.wiley.com/doi/10.2903/j.efsa.2015.4310/epd.

Hofer, et al (February 2000), Parasitology, Cambridge University Press (Volume 120, Issue II) – High prevalence of *Echinococcus multilocularis* in urban red foxes (*Vulpes vulpes*) and voles (*Arvicola terrestris*) in the city of Zürich, Switzerland: www.cambridge.org/core/journals/parasitology/article/high-prevalence-of-echinococcus-multilocularis-in-urban-red-foxes-vulpes-vulpes-and-voles-arvicola-terrestris-in-the-city-of-zurich-switzerland/B23EF307EAED98B930218B6E1D5892D4.

Umhang G, et al (November 2015), Veterinary Parasitology (Volume 214, pp. 75-9) – *Echinococcus multilocularis* detection in the intestines and faeces of free-ranging domestic cats (*Felis s. catus*) and European wildcats (*Felis s. silvestris*) from northeastern France: www.sciencedirect.com/science/article/pii/S0304401715002873.

still valid today. They felt that because *Echinococcus multilocularis* is widespread in Europe and significant numbers of pet animals are travelling to Great Britain from such affected countries each year (either as returning pets or European pets visiting great Britain), it was crucial to maintain tapeworm controls. Some argued that the introduction of the parasite could become a major public health issue and that the high populations of definitive hosts present in the UK (dogs, foxes, other canids and less commonly cats) meant that the tapeworm was likely to become permanently established if it entered the country.

As per question 24, several respondents from veterinary and pet welfare/owning organisations strongly believed that the window for *Echinococcus multilocularis* tapeworm treatment should be shortened to 24-48 hours to provide greater protection against the parasite. These respondents generally also called for the re-introduction of mandatory tapeworm treatment for cats that use the pet travel scheme.

Of the three further comments received by those who answered no: one respondent believed the *Echinococcus multilocularis* tapeworm was already in the UK; one believed that tapeworm controls were excessive; and one respondent felt that the current controls risked overdosing a frequently travelling pet with praziquantel.

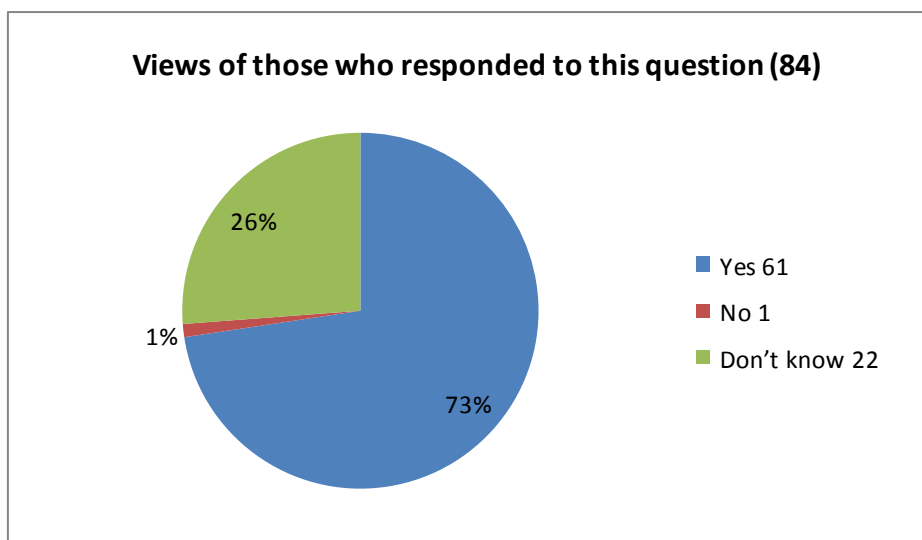
Question 26: Part 2 of the 2011 Order provides for the administration and enforcement of certain EU health measures to protect the UK against:

- **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 today?

18 respondents provided further comments in support of their answer. Of these, 17 were in agreement that the disease control measures are still justified as they believed that preventing the entry of such diseases into Great Britain was a priority. One respondent specifically stated that the human and animal health risks greatly outweighed the administrative burdens of implementing these requirements in the 2011 Order, plus several others suggested that this section of the 2011 Order should be reviewed regularly in order to take account of geographical changes in the distribution of these diseases, plus potential new emerging threats, such as bubonic plague (in the USA). A few respondents indicated that *leishmaniasis*, *ehrlichiosis*, *babesiosis* and possibly *tularemia* were animal diseases that could be specifically targeted by the 2011 Order in future.

Oksanen A, et al (2016), Parasites & Vectors (Volume 9, pp.1-23) – The geographical distribution and prevalence of *Echinococcus multilocularis* in animals in the European Union and adjacent countries: a systematic review and meta-analysis: download.springer.com/static/pdf/318/parasitesandvectors.biomedcentral.com



Two respondents believed that there is evidence that the Nipah virus had spread to Bangladesh and India and it was suggested that the geographical location referred to the 2011 Order should be amended to reflect this.

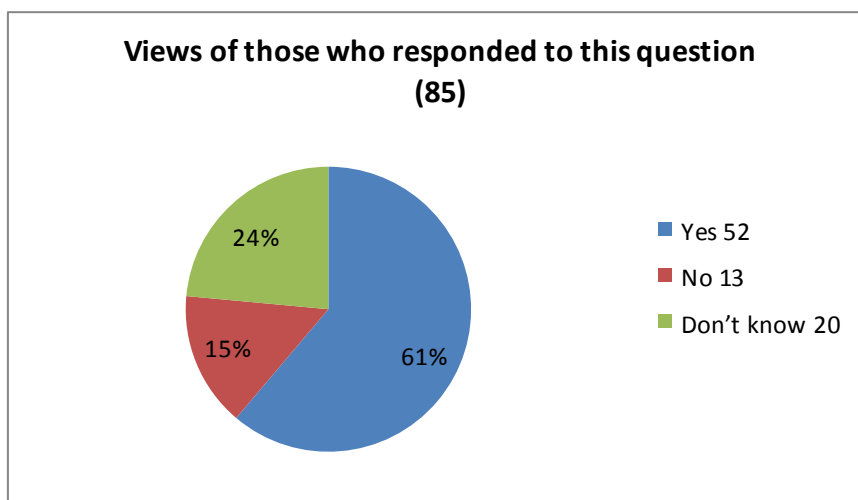
The respondent who did not agree with continuation of the controls was a pet owner, but they did not supply any reasoning for their response.

Question 27: Microchipping of pet animals: Part 2A of the 2011 Order sets out the minimum qualifications required for persons who are permitted to implant microchips for the purpose of preparing a pet for overseas travel. Eligible persons are:

- **A veterinary surgeon or a veterinary nurse acting under the direction of a veterinary surgeon¹³.**
- **A student of veterinary surgery or a student veterinary nurse (who are acting under the direction of a veterinary surgeon).**
- **A person who has been satisfactorily assessed on a microchipping training course approved by Defra, Scottish Ministers or Welsh Ministers.**
- **A person who, before the 29 December 2014, received training on implantation that included practical experience of implanting a microchip.**

Do you believe that these requirements have worked effectively?

¹³ “student veterinary nurse” and “veterinary nurse” have the meanings given by Schedule 3 to the Veterinary Surgeons Act 1966; “student of veterinary surgery” has the same meaning as in regulation 3 of the Schedule to the Veterinary Surgeons (Practice by Students) Regulations Order of Council 1981; and “veterinary surgeon” means a person registered in the register of veterinary surgeons, or the supplementary veterinary register, kept under the Veterinary Surgeons Act 1966.”



52% of respondents believed that the microchipping regulations had been effective. Several respondents who answered yes justified their view by advising that the 2014 microchipping requirements¹⁴ were very important in order to regulate who is able to implant microchips and so help safeguard animal welfare. One respondent stated there had been an issue of a lack of approved training providers when the requirements were first introduced, but indicated this had now improved.

Many vets felt that microchip transponders should only ever be inserted by veterinary professionals (including veterinary nurses and students under veterinary surgeon supervision), citing publicised cases where inappropriate microchipping had resulted in significant medical consequences for pet animals.

A trading standard representative who answered no felt that microchipping training courses should only be given by experienced veterinary professionals and certification enabling someone to microchip an animal issued only once a veterinary surgeon had assessed that the implanter was adequately trained. Periodic assessments of the skills of trained implanters should also be required and a mechanism should be in place to remove an implanter's certificate, if necessary.

Two welfare organisations wanted to see all microchips implanted in British pets to be registered on centrally accessible database, which was then further linked to a similar database across the EU. They believed this would improve traceability of pet movements and so assist in identifying potential fraudulent activity or the government's understanding of when and how a pet entered Great Britain in the event of a disease outbreak situation.

¹⁴ The minimum qualifications required for persons, other than veterinarians, permitted to implant microchips for the purpose of preparing a pet for overseas travel were introduced by The Non-Commercial Movement of Pet Animals (Amendment) Order 2014 on 29 December 2014.

Question 28: Part 3 of the Order – Pet checkers approval process: Do you agree that 100% pet checks are proportionate, and why?

Response	Number	Percent (%)
Yes	70	78%
No	11	12%
Don't know	7	8%
Not answered	2	2%
Total	90	100%

Comments made by respondents who supported 100% pet checks often centred on the belief that such checks were necessary to ensure that only pet animals with the correct health preparations could enter Great Britain. Many respondents felt that 100% checks were justified since this also provided an opportunity to identify and intercept underage animals or animals moving with falsified passports or other documentation as part of illegal trading activity. It was thought that any relaxation of pet checks could result in the number of illegal movements of pets (chiefly puppies and kittens for sale) to increase significantly because this change would be exploited by illegal traders.

One local authority explained that reduced pet checks would result in increased numbers of non-compliant animals entering Great Britain. This would increase the potential disease risk to public and animal health and also create non-compliance issues inland (i.e. away from border entry ports), which would be inefficient and place pressure on scarce resources within such local authorities.

Several respondents felt that the actual checking process could be improved. Suggestions included:

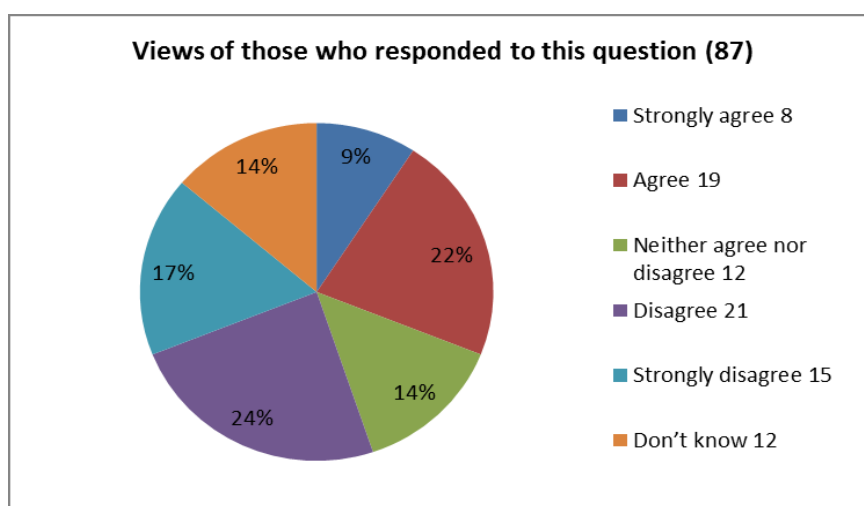
- Better training to be given to pet checkers (pet transport carrier employees) to ensure that checks are carried out to an adequate standard.
- Pet microchips to be scanned by pet checking staff and not by pet owners.
- More veterinary or animal health officer resources to be available at British border entry points to assist in accurately ageing pet animals.
- Border control officials to conduct random searches of vehicles carrying pets to look for hidden animals.

- Pet checks to be carried out by government agencies (and not pet transport carriers) to ensure a consistent and robust standard.
- Consider carrying out pre-movement pet checks before animals leave Great Britain – to ensure that pet owners are aware of the entry requirements to return unhindered, plus also raise awareness of potential animal welfare issues that could be created by taking elderly or infirm animals abroad.

Analysing the comments received from those who answered no revealed that the majority of these respondents did not appear to object to pet checks in principal, but rather highlighted what they believed were weaknesses in the current pet checking arrangements. These included: experiences of pets not being checked at all; pet microchips being scanned by their owners out of direct sight of Border Control Officials (which could be exploited by illegal traders); pet checks focussing only on documentary (passport and microchip) checks rather than physical checks of animals to confirm if they are healthy or carrying disease; and instances where pets were allowed into Great Britain despite them not having the correct vaccination or health treatment paperwork.

Two respondents highlighted that most other EU countries did not implement 100% pet checks and believed that heavy penalties, such as fines and the threat of an animal being destroyed, combined with random checks of pet animals entering Great Britain could be a strong enough deterrent on their own to ensure compliance with the pet travel scheme rules.

Question 29: Part 3 of the Order – Pet checkers approval process: 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?



Those who supplied supporting comments to justify their response gave the following reasons.

Agree/Strongly agree (31%): Several respondents commented that the pet checks had proved effective for conscientious pet owners who wanted to comply with the legislation,

but that they did not deter the illegal importation of underage puppies for commercial purposes. Two respondents believed that some pet owners were still unaware of the need to present their animal for checking upon arrival in Great Britain and so further education would be helpful, for example in the case of Recognised Assistance Dogs arriving at regional airports and also pet dogs travelling on private boats arriving in Great Britain from overseas¹⁵. One pet transport carrier employee thought that pre-movement notification procedures at airports were particularly effective at making sure potential issues of non-compliance were picked up before pets travelled to Great Britain.

A local authority officer who agreed that pet checks had been effective suggested that the checking process would benefit from including a mandatory check on the age of animals. Investigating cases of suspected underage puppies was a significant issue for their local authority, which they believed could be addressed by requiring pet carriers to employ staff who could accurately age animals and so prohibit underage animals from entering Great Britain. They also wanted the 2011 Order amended to explicitly state that pet checkers should be required to keep records of all pet animals that they had checked, as this could be useful for potential later enforcement action.

Neither agree nor disagree (14%): Three respondents were in agreement that the pet travel legislation was appropriate, but that the actual practical pet checking process of was open to abuse by those who were intent on evading the rules.

Strongly disagree/disagree (36%): Many respondents believed that the pet checking process had been ineffective at preventing an increase in the numbers of pets that were illegally entering Great Britain under the pet travel scheme for commercial trade. Respondents felt that the current system of documentary checks and the ability for pet owners (or authorised persons) to bring up to five animals per person into Great Britain had facilitated the entry of groups of animals, including underage puppies and kittens, for the purposes of sale or rehoming under the disguise of non-commercial movements.

Several respondents believed that corruption and falsification of pet passports in other EU Member States (particularly central and eastern European countries) had been an issue. This had led to instances of poor veterinary controls being applied and the entry of animals that did not comply with the rules concerning minimum age and vaccination requirements.

Other comments in this category included:

- Microchip and documentary checks had failed to prevent the entry of underage puppies into Great Britain, as shown by Dogs Trust and RSCPA investigations¹⁶.

¹⁵ Article 5 of the Non-Commercial Movement of Pet Animals Order 2011 requires that pets can only enter the UK only on an approved carrier and on an approved route (except from ROI). See: www.gov.uk/take-pet-abroad/approved-routes

¹⁶ Dogs Trust (2014) – The Puppy Smuggling Scandal: www.dogstrust.org.uk/media-centre/puppy%20smuggling%20report%202014.pdf; Dogs Trust (2015) – Puppy Smuggling: The Scandal

- A belief that pet checkers were not adequately trained to check that a pet was actually the one represented on a pet passport and that they were sometimes failing to spot missing rabies vaccination and *Echinococcus multilocularis* tapeworm treatments. (It was suggested that they receive increased training or that this activity should be transferred to government agencies.)
- As pet checkers were employed by commercial organisations (e.g. ferry companies and Eurotunnel), a potential conflict of interest exists whereby they may feel under pressure to accept pet movements.
- More random checks were needed of the vehicles of people declaring they are travelling with pets in order to look for concealed, undeclared animals.
- There was no traceability of pet movements into Great Britain, so if an animal is later found to be non-compliant with the pet travel scheme rules it may be impossible to accurately trace its original point of entry.

Two respondents queried whether it remained appropriate for the current arrangement for non-commercial pet movements from Ireland to the UK to be exempt from pet checks. They believed evidence suggested that there was an increasing volume of direct movements of pets from mainland Europe to Ireland, which could have implications for the potential risk of animal disease entering the UK.

Question 30: Enforcement: The 2011 Order sets 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?

Response	Number	Percent
Strongly agree	6	7%
Agree	13	14.5%
Neither agree nor disagree	11	12%
Disagree	20	22%
Strongly disagree	9	10%
Don't know	27	30%
Not answered	4	4.5%
Total	90	100%

A summary of comments received in support of people's answers follows.

Strongly Agree/Agree (21.5%): A trading standards officer indicated that the enforcement powers present in the 2011 Order were fine. However, they felt that enforcement activity itself was restricted by a limited ability of local authority Animal Health Officers to accurately age puppies and therefore enforce the minimum age requirements of the pet travel scheme. They pointed to a 2016 joint Dogs Trust, Animal and Plant Health Agency and local authority project at Dover that had facilitated the aging of pets entering Great Britain and had resulted in a marked increase in seizures of non-compliant puppies.

A local authority officer advised that enforcement of the 2011 Order had been difficult because offences were sometimes minimal and so did not justify the resource costs of pursuing enforcement action. A common issue that had also prevented enforcement action was situations where a person was found in possession of a non-compliant pet animal that they had bought shortly after it had been imported illegally. These pet owners were in effect "end users" and so had not committed an offence under the 2011 Order, while those who had imported the animals illegally (and committed an offence) were often difficult to trace. It was also noted that the 2011 Order did not give local authorities the power to seize or detain pet travel documents; the ability to do so could be helpful for

pursuing cases where animals had entered Great Britain under false or forged passports or animal health certificates.

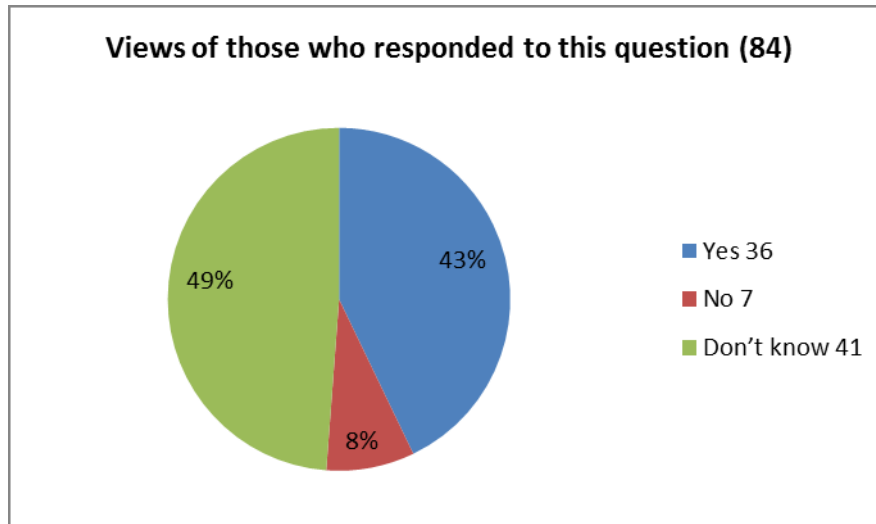
Neither agree nor disagree (12%): One local authority officer believed that local authorities had the necessary powers to carry out enforcement, but that stronger action at the border would be a more effective enforcement action. Two respondents questioned whether local authorities had enough resources to apply the enforcement provisions in the 2011 Order and stated that there was varying appetite between local authorities regarding whether potential non-compliant movement cases were followed-up with enforcement action.

Strongly disagree/disagree (32%): Respondents in this category included three trading standards officers, 13 vets, several pet owners and members of animal welfare organisations. Many believed that enforcement of the 2011 Order was not effective due to a mixture of reasons:

- Local authorities only being alerted to non-compliant pets several days or weeks after they have been in the country. Owners of newly acquired pets (chiefly puppies) would take the animal to a vet who then identified that the animal was underage, missing a rabies vaccination or *Echinococcus multilocularis* tapeworm treatment or had travelled without the correct pet passport documentation. Enforcement action was then very difficult as the person who had committed an offence by selling the animal often could not be traced.
- A lack of understanding amongst local authorities and Trading Standards officers regarding their obligations and enforcement responsibilities under the 2011 Order, for example when to quarantine pets suspected of having entered Great Britain illegally.
- Limited financial resources and motivation of local authorities to investigate and enforce cases of potential non-compliance. This was thought to be a particular issue for local authorities within whose boundaries there were approved routes for pet cats, dogs and ferrets to enter Great Britain.
- Reduced availability of local authority staff on weekends or out of office hours for pet checkers, airport staff and veterinarians to report suspect cases to.
- Lack of intelligence sharing amongst bodies, such as local authorities, pet carriers and the Animal and Plant Health Agency (although it was noted that this had improved during 2016 with a Dogs Trust-supported project at Dover, Kent).
- Fines and penalties under the 2011 Order did not act as a deterrent to large-scale illegal traders as profits that could be made from illegally importing puppies outweighed the risks of being caught.
- Local authorities did not have powers under the 2011 Order to enter a domestic premise which their officers had reason to believe contained an illegally-landed pet.

Obtaining a Magistrate’s warrant introduces a delay, during which an animal can be re-located, becoming untraceable and a potential disease risk elsewhere.

Question 31: Enforcement: Do you believe the enforcement provisions in the 2011 Order could be improved?



We asked the 43% of respondents who responded yes to outline their suggestions.

Suggestions received can be broadly summarised as those requiring legislative change and those that could be delivered by operational, financial or administrative means.

Legislative improvements (mainly suggested by local authority and Trading Standards officers.)

- Amend Article 14 of the 2011 Order to make it clear that local authorities have a statutory requirement to enforce the pet travel legislation. This could be achieved by amending the word “may” to either “should” or “must”¹⁷.
- Amend Article 15(8) of the 2011 Order to allow authorised officers to seize original pet travel documents, rather than only being able to take copies. Similar text to that found in Regulation 34(e) of The Trade in Animals and Related Products Regulations 2011, could be used.
- Amend the 2011 Order to modify the Rabies (Importation of Dogs, Cats and Other Mammals) Order 1974 so that pets that have been licensed into quarantine by local authorities (due to not having the correct rabies vaccination requirements) can enter into local authority ownership should their owner not meet the costs of quarantine. It was remarked that civil claims to recoup such costs were complicated and time consuming, resulting in additional costs to tax payers.

¹⁷ Article 14(1) of The Non-Commercial Movement of Pet Animals Order 2011 states: “The local authority or the appropriate authority may authorise officers for the purpose of enforcing the relevant instruments.”

- Amend Article 15 to give a clearer definition of what is a 'recognised assistance dog'. Similar text to that contained in UK Civil Aviation Authority safety notice guidance could be used.
- Require all people travelling with pets under the EU pet travel scheme to sign a declaration confirming that they are making a non-commercial movement.
- Prevent the commercial movement of underage puppies under the pet travel scheme by introducing a maximum number of two animals being allowed to enter the UK in situations where animals are under six months of age. Anyone wishing to bring in a larger number could apply to Defra for an exemption. It was suggested this maximum number could apply to an individual vehicle or consignment, rather than per pet owner or authorised person.
- Require those wishing to bring pet cats, dogs and ferrets that are not ordinarily resident in Great Britain to firstly obtain a licence from the UK government to approve the movement.

Other improvements

Collaborative

- Encourage better cross-agency working and intelligence sharing between government agencies, local authorities, pet transport carriers and animal welfare organisations. This could include the development of an intelligence system to record and share data in respect of illegally traded animals and suspicious travellers, for example the registrations of vehicles carrying pets that are making repeated trips abroad.
- Assist enforcement activity by creating a central database to track pet movements into the UK by recording and cross-referencing pet microchip numbers with details (such as passport numbers) of the persons accompanying them.

Resourcing and operational

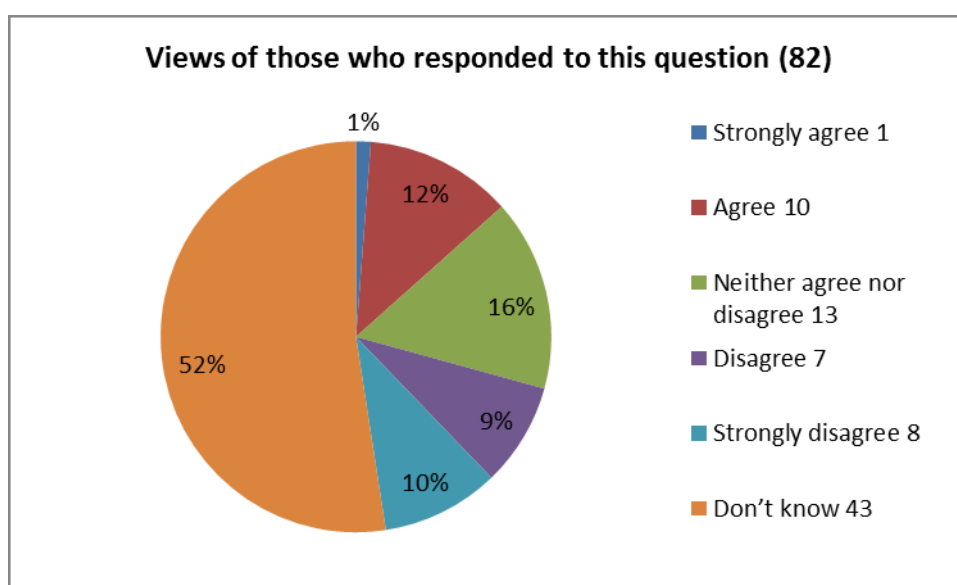
- Increase government agency and local authority resources at border entry points to more effectively enforce the 2011 Order by supporting more animal health officers and veterinary resources (to accurately age young animals). Provide on-call local authority and veterinary surgeon or veterinary nurse cover during out of office hours and weekends (and consider charging pet owners for this).
- Conduct more random checks of vehicles of people declaring they are travelling with pets in order to look for concealed, undeclared animals.
- Transfer the responsibility for pet checks and enforcement to government agencies (from pet transport carriers and local authorities).

- Provide better training to pet transport carrier employees, to ensure that pet checks are carried out to an adequate standard, including them visualising an animal's microchip being scanned.
- Border control officials to conduct random searches of vehicles carrying pets to look for hidden animals.

Training and information

- Government agencies to provide training to local authority staff to ensure they are aware of, and clear on, their enforcement responsibilities. This could include joint mock exercises in conjunction with pet transport carriers.
- Government to provide clear advice to local authorities as to what constitutes “reasonable” evidence that an animal has been imported illegally and should be quarantined.
- Supply training to UK Border Force officials on the pet travel scheme requirements, so that they can more easily spot potential infringements of the pet travel rules.
- Conduct an awareness-raising campaign amongst pet owners (potentially through UK vets) to raise awareness of the financial, emotional and logistical costs of quarantine following the discovery of a non-compliant pet re-entering the UK.

Question 32: 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 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?



52% of respondents did not have a view on whether the offences and penalties in the 2011 Order were appropriate.

Of those who answered agree, one respondent believed that the penalties in the 2011 Order were fair when applied to situations where pet owners were travelling with their own animals, but that prosecutions of traders illegally importing many animals were more appropriately conducted under other legislation, such as The Rabies (Importation of Dogs, Cats and Other Mammals) Order 1974, the Trade in Animals and Related Products Regulations 2011 and fraud legislation.

Of those who answered disagree or strongly disagree, many respondents believed that penalties under the 2011 Order¹⁸ had had little effect in deterring people who were bringing puppies into Great Britain illegally for the purposes of sale.

“Smuggling dogs is big business and the penalties in terms of fines are not enough to discourage the trade.”

Five animal welfare organisation respondents and three veterinarians would like penalties under the 2011 Order increased. One suggested that penalties should be amended to provide for indictable offences (rather than only summary offences) with a maximum of two years in prison and an unlimited fine, while another believed that an indictable offence enabling a maximum penalty of five years in prison would be appropriate.

Question 33: If you answered ‘Strongly disagree’ or ‘Disagree’ to question 32, in your opinion what sanctions could be put in place to increase compliance with the pet travel rules?

A summary of comments received is shown below:

- Increase the level of fines available under the 2011 Order.
- Increase the level of custodial sentence available under the 2011 Order.
- Improve the range of enforcement options available by giving relevant authorities the power to issue Fixed Penalty Notices for pet travel-related offences, for example giving a false declaration that a cat, dog or ferret is moving for non-commercial purposes and for issuing (vets) or presenting a falsified pet passport.
- Add the following specific offences to the ‘Offences’ section of the 2011 Order:
 - An offence to not declare or present a pet cat, dog or ferret for pet travel scheme compliance checks.

¹⁸ Article 17(2) of The Non-Commercial Movement of Pet Animals Order 2011 states: “A person guilty of an offence under article 16 is liable on summary conviction to imprisonment for a term not exceeding three months or to a fine not exceeding level 5 on the standard scale.”

- An offence to make a false declaration that an animal is being moved as a non-commercial pet movement when it is actually being moved for commercial purposes or the exchange of ownership.
- An offence to knowingly avoid the requirements under pet travel Regulation (EU) No 576/2013 concerning pet movements from an unlisted third country by moving a cat, dog or ferret into a listed third country for preparation for entry into an EU Member State.

Next steps

Defra is very grateful to all those who took the time to respond to this consultation.

A significant amount of useful feedback has been received from a wide group of interested parties and this will be used over the coming months to inform our review of The Non-Commercial Movement of Pet Animals Order 2011.

Defra will also use the many comments made by respondents that directly related to the requirements of Regulation (EU) No 576/2013 (the EU pet travel scheme) to inform any future policy development regarding pet travel that may be undertaken as a consequence of the UK's June 2016 decision to leave the European Union.

Annex 1 – organisations who responded to the consultation

- Advisory Committee on Dangerous Pathogens
- Akmar Basenjjs Kennels
- Animal Aircare Company Ltd
- Animal Reception Centre, Glasgow Airport
- Aquarius Veterinary Centre (Suffolk)
- BAI UK Limited ('Brittany Ferries')
- Battersea Dogs & Cats Home
- Black Sheep Vets (Lincolnshire)
- British Association for Shooting and Conservation (BASC)
- British Small Animal Veterinary Association (BSAVA)
- British Veterinary Association (BVA)
- Calagran Quarantine Kennels
- Cats Protection
- City of London Corporation
- Davies Veterinary Specialists (Hertfordshire)
- Department of Agriculture, Environment and Rural Affairs (DAERA)
- Dogs Trust
- Felis Britannica
- FlairJet Ltd
- Forest Lodge Veterinary Practice (Hampshire)
- Gloucestershire County Council (Trading Standards Service)
- Governing Council of the Cat Fancy
- Hampshire Trading Standards
- Kent County Council
- Lagotto Romagnolo Association
- Lancashire Trading Standards (Enforcement for Animal Health)
- Lynton House Veterinary Centre (Surrey)
- Moreton Hall Veterinary Centre

- National Animal Health and Welfare Panel for England
- People's Dispensary for Sick Animals (PDSA)
- Pet Healthcare Centre (Hythe)
- Public Health England
- Royal Yachting Association
- RSPCA
- Southend Borough Council
- St Martins Veterinary Clinic (London)
- Torbridge Veterinary Hospital (Devon)
- University of Liverpool - Liverpool Veterinary Parasitology Diagnostics
- Vets4Pets
- Virgin Atlantic Airways
- Wiltshire Council