

Ensuring animals have a good life by advocating on their behalf

- ★ The RSPCA advocates responsible pet ownership and works towards reducing the number of exotic pets being kept inappropriately and improving their care in captivity.
- ★ The RSPCA wants the Kept Animals Bill to be amended to deliver the government's intended ban on the keeping and trade of primates as pets. The breeding and commercial trade of primates as pets needs to stop.
- * Restrictions should cover other species, including those on the Dangerous Wild Animal Act list, such as wild cats, servals and crocodiles.
- ★ Current UK regulation and policy is insufficiently precautionary, with the result that anyone can buy and keep most exotic species as a pet. The RSPCA wants the government to open up a discussion about how to better regulate the keeping and trade of exotic species kept as pets to adequately protect these animals. Positive lists have been used successfully in some countries and merit consideration as a way forward.
- ★ As well as serious animal welfare issues, the exotic pet trade is associated with significant risks to conservation, human and animal health and safety, and the environment.

One of the most significant changes the RSPCA has seen over the years has been the increase in the variety of animals that we rescue. Along with the many dogs, cats and horses we help, we have come to the aid of many other species including lizards, snakes, tortoises, parrots, sugar gliders, raccoon dogs; the list is extensive. Problems we see vary from abandonments of animals like pythons and parrots, to severe cases of neglect or abuse. Many problems occur due to a lack of understanding about these animals. These sentient beings can be bought by anyone without prior knowledge or expertise, resulting in these animals often being kept in inadequate conditions and being fed poor diets and suffering as a result. The RSPCA advocates responsible pet ownership and works towards reducing the number of exotic pets being kept inappropriately and improving their care in captivity.

The RSPCA and Born Free Foundation have produced 'The exotic pet-demic' report on the issues generated by exotic pet keeping. The Kept Animals Bill offers the potential to improve matters for primates and possibly other species, but we want this report to start a wider conversation about the keeping of exotic pets in the UK and what can be done to improve the current situation for these animals.

Scale of the industry

The current lack of licensing or registration requirements in the UK makes it difficult to accurately estimate the numbers of exotic pets. The Pet Food Manufacturers' Association (PFMA) estimates that 1.8 million reptiles, amphibians, and invertebrates, and 1.3 million indoor birds (excluding domestic fowl and pigeons) were kept in the UK as pets in 2021. Demand has increased steadily, from an average of 8,000 'foreign' animals passing through London Airport every month in 1965¹ to 300,000 reptiles and amphibians passing through Heathrow Airport alone in 2010.²

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¹ Hall, C. From the archive: the alarming rise in exotic pets, September 1965. The Guardian https://www.theguardian.com/lifeandstyle/2021/may/09/from-the-archive-the-alarming-rise-in-exotic-pets-september-1965 (2021)

² Walters, R., Westerhuis, D. S. & Wyatt, T. Emerging Issues in Green Criminology: Exploring Power, Justice and Harm. (Springer, 2013).

Animal Welfare impacts

There is strong evidence that exotic pets are not provided with their basic welfare needs as specified in the Animal Welfare Act 2006, such as a suitable environment, suitable diet, the ability to exhibit normal behaviours, social needs, and the need to be protected from pain, suffering, injury and disease.

In 2020, the RSPCA received 6,119 reports relating to exotic pets involving 22,865 animals (8,632 birds, 4,094 reptiles and 635 mammals) - 26% related to neglect or deliberate harm; 25% were requests for assistance; 25% were abandoned or found as strays and 13% were sick or injured (RSPCA unpublished data).

These are wild animals with often highly complex natural history and incompletely understood welfare needs. Many issues we see result from the difficulties of trying to meet these needs in a normal domestic setting. As a result, many of these animals suffer.

Many species have not evolved to survive in the UK and so require artificial light and heat to keep them healthy³, but the necessary information and equipment is often variable in quality, unknown, or not available to those buying these animals. Diets are often poorly understood or just wrong, with animals fed the equivalent of 'junk' food, leading to ill health caused by malnutrition⁴.

Enclosures are often too small and do not allow animals to move around and explore, or express other normal behaviours⁵. Exercise outside is possible but this can provide opportunities to escape into the wild, where animals may not survive, or where they may survive and breed leading to possible environmental impacts⁶. Some species need to be kept on their own, or with others of their own kind, but again, this does not always happen leading to behavioural problems.

Disease or injury are commonly observed in exotic pets in the UK A 2016 survey by the British Veterinary Association (BVA) found that more than half of companion animal vets had treated exotic pets in the previous year, and 77% of those vets had only seen exotic pets when they were sick or injured, rather than for a routine health check.⁷

There are significant welfare concerns with the collection or breeding of these animals, depending on whether they come from the wild or are captive-bred, along with their holding and transit, before entering the market. Mortality levels can be high during the capture and transport process⁸, and animals may not survive at their final destination for anything like their normal life span.

Conservation and environmental impacts

The collection of live animals from the wild for the exotic pet trade has led to serious, and in some cases catastrophic, population declines in some species, in addition to the suffering that animals are put through, either through illegal smuggling or by the legal trade. The wildlife trade has been described as an 'important and increasing driver of biodiversity loss'. Furthermore, the demand for, and increased value of, rare

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³ Whitehead, M. L. Factors contributing to poor welfare of pet reptiles. Testudo 8, 47–61 (2018)

⁴ Whitehead, M. L. Factors contributing to poor welfare of pet reptiles. Testudo 8, 47–61 (2018)

⁵ Burman, O., Hoehfurtner, T., Walker, M. & Wilkinson, A. Does enclosure size influence the behaviour & welfare of captive corn snakes (*Pantherophis guttatus*)? https://eprints.lincoln.ac.uk/id/eprint/43621/ (2020).

⁶ Holbrook, J. & Chesnes, T. An effect of Burmese pythons (*Python molurus bivittatus*) on mammal populations in southern Florida. Fla. Sci. 74, 17–24 (2011)

⁷ British Veterinary Association. Exotic pets (non-traditional companion animals).

https://www.bva.co.uk/take-action/our-policies/exotic-pets-non-traditional-companion-animals/.

⁸ Dale, A. CITES round-up: the world speaks up for the African Grey. BirdLife International

http://www.birdlife.org/worldwide/news/cites-round-world-speaks-african-grey.

⁹ Bush, E. R., Baker, S. E. & Macdonald, D. W. Global trade in exotic pets 2006-2012. Conserv. Biol. 28, 663–676 (2014).

species exacerbates the existing threat of extinction. Biologists who identify new species are reluctant to reveal the location of where such species can be found, knowing that these animals will then enter the trade¹⁰.

The escape or deliberate release of exotic pets can result in the establishment of invasive alien species, with potentially serious consequences for native wildlife and environments. In addition the control of these animals can have significant associated costs in terms of animal welfare and financial¹¹.

Human health and safety impacts

Exotic pets can present a risk of injury and infection to people. Injuries can include scratches, lacerations, bites, venomous bites and stings, constriction, and associated issues such as wound infection. In extreme cases, exotic pet animals have caused the deaths of their owners or others¹².

Some species of exotic pets may also harbour zoonotic pathogens, which can cause serious disease in individual people and/or other animals, and may present a risk of emerging infectious diseases and, in extreme cases, pandemics¹³.

Current UK regulations do not adequately mitigate these risks. Health requirements that apply to some species imported to the UK, such as quarantine, vaccination or infectious disease testing, are highly variable. Some animals need documentation to meet animal health import requirements but many do not. As screening for zoonotic pathogens is not carried out for all *legally* imported exotic pets, the risk of importing zoonotic diseases from these animals is potentially high, let alone the potential risk from illegally imported animals.

Existing legislation

It is currently legal in the UK to keep almost any animal as a pet, although certain requirements apply to some species. As a result regulation and policy in relation to the trade in and keeping of exotic pets is piecemeal, reliant on under-resourced local authorities to do what inspections are required. The Dangerous Wild Animals Act regulates keeping of some species but it has not led to a decrease in the numbers kept, despite a statement made by Lord Chelwood, in Parliament in 1976, "...in future the keeping of dangerous wild animals by private individuals should be made a wholly exceptional circumstance". This does have parallels with the current debates regarding keeping of primates under the Kept Animals Bill. Other legislation prevents the keeping and trade of Invasive Alien Species, such as raccoon dogs.

The proposed Kept Animals Bill, in its current form, will not ban the keeping of primates as pets, but proposes a system for regulating their keeping. The RSPCA wants to see the Bill amended, including banning breeding and commercial sales and that the provisions of the bill be expanded to include other species.

Longer term, the RSPCA wants the government to open up a discussion about how to better regulate the keeping and trade of exotic species kept as pets as the current system is not adequately protecting these animals. Positive lists have been used successfully in some countries and merit proper consideration as a way forward. It isn't a simple or straightforward process and there's a lot to consider to ensure it delivers

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¹⁰ Auliya, M. et al. Trade in live reptiles, its impact on wild populations, and the role of the European market. Biol. Conserv. 204, 103–119 (2016)

¹¹ Williams, F., R. Eschen, A. Harris, D. Djeddour, C. Pratt, R. S. Shaw, S. Varia, J. Lamontagne-Godwin, S. E. Thomas, and S. T. Murphy. 2010. "The Economic Cost of Invasive Non-Native Species on Great Britain." cabi.

¹² Smith, K. M., Smith, K. F. & D'Auria, J. P. Exotic pets: health and safety issues for children and parents. J. Pediatr. Health Care 26, e2–e6 (2011).

¹³ Shivaprakash, K. N., Sen, S., Paul, S., Kiesecker, J. M. & Bawa, K. S. Mammals, wildlife trade, and the next global pandemic. Current Biology (2021) doi:10.1016/j.cub.2021.06.006.

better animal welfare on the ground, but it's time to look at this issue seriously and take action.

The way forward

The RSPCA would like to see:

Amending/Tightening up the Animal Welfare (Kept Animals) Bill

- Proposals for pet primates do not go far enough and they do not stop the breeding and commercial trade of primates as pets between licence holders
- Restrictions should include other species, including those on the Dangerous Wild Animal Act (DWAA) list, such as wild cats, servals and crocodiles

Government should give consideration to developing a robust 'Positive List' system

- start a discussion about how to better regular keeping and trade in exotic pets, including consideration of positive list system
- establish a lists of species that can be kept as pets, subject to welfare (and other) guarantees, based on whether they meet specified criteria
- excludes or restricts the trade in and keeping of those that do not (or have not been assessed).

UK Govt should consider and consult on its future approach to the trade in and keeping of exotic pets

- to mitigate and prevent animal welfare, conservation, human and animal health and safety, and environmental risks, as well as respecting species protections in other countries.
- considerations should include a thorough evaluation of current, relevant legislation and its
 effectiveness, and an evaluation of systems already introduced or under consideration in
 other jurisdictions.

CALL TO ACTION...

Please sign this <u>petition</u> to review/reform of private keeping of DWAs