



Setting Standards on Global Commercial Transport of Cats and Dogs

Commercial transport includes moving for the purpose of change of ownership or as part of a business. . Journey time is the total from loading to unloading

Why Standards Are Needed

Despite a reference in the Transport Regulation 1/2005, there have been no specific provisions for cats and dogs in the law, no proposals by the European Commission and no relevant EFSA opinions regarding the movement of cats and dogs have become available since the Regulation entered into force. Now that the UK is in a position to set its own direction on such matters, it is the opinion of CFSG that the legal conditions for the transport of companion animals be reviewed.

Whilst dogs are regularly transported commercially, and cats to a much lesser extent, scientific evidence on the welfare of dogs and cats during transport is limited. Nonetheless, CFSG members have undertaken some research, mainly around dogs, with the RSPCA having commissioned research and Dogs Trust having an in-house research team, who have reviewed the available evidence. Previous research on dogs in transport has included studying dogs transported as pets and for working purposes, observational studies of dogs during routine and long-distance transport and experimental studies which manipulated aspects of transport to explore their effect on welfare.

Observations of dogs generally during travel over multiple days found that long distance transport is stressful. The studies do suggest that large numbers of dogs suffer from fear and anxiety when transportedⁱ and as many as 24% of companion dogs may exhibit problematic behaviour during transportation.¹ Many companion dogs will have received some training/habituation to being transported whereas puppies and street/community dogs will not and are therefore more likely to be stressed by the novel experience. The inclusion of a midway stop during the travel period appeared to provide some respite since cortisol levels decreased overnight indicating that stress levels are lower. It is therefore essential that these are legally mandated now that the UK has left the EU.

There are very few studies on the transportation of cats and those that are available tend to be concerned with transportation to the veterinary practice. Nonetheless it is well considered by cat welfare experts that travelling and the associated confinement is a significant cause of stress for cats which in turn can lead to health problems.ⁱⁱ Cats have descended from a territorial ancestor and therefore value their own area for provision of resources and a sense of security. Thus, travel is likely to be a common stressor for cats since it both displaces them from their territory and reduces their sense of control over access to their resources.ⁱⁱⁱ

A Royal Canin survey of cat ownership in December 2019 showed that 24% of the cat owners said that they didn't take their cat to the vet as frequently as they should because of the stress (both transportation and the visit itself). Other papers look at sedation and carrier training to make trips to the vet easier and less stressful.^{iv} This demonstrates that even 10-minute journeys are highly

stressful for cats. Carrier training, sedation and the use of artificial pheromone products can be helpful (references at the end).

Extra consideration should be given to the transportation of young animals and it would be anticipated that puppies and kittens would be on 3-4 meals a day which has implications for how they can be transported in a way which ensures good welfare. Similarly bitches and queens in their last trimester of pregnancy should be receiving more smaller and frequent meals owing to the nutritional requirements of the offspring and reduced abdominal space, however please see recommendation below to **not** transport pregnant bitches and queens if they are in the second half of pregnancy.

For both dogs and cats, the likelihood of the animals being habituated/trained to accept transport is relatively low. On the precautionary principle we therefore consider that the assumption should be that transport is likely to be a stressful event for a very significant proportion of pets and that specific conditions are as necessary to protect their welfare as they are for farmed species.

Transport by air has very different factors compared to road transport. The International Air Transport Association (IATA) has very clear guidance for all animals transported by air. Consequently, all comments in this document will be restricted to road transport which accounts for a much greater proportion of animal movements. This should be continued to be the case for any new legislation. It is clear, however, that some flights will exceed the maximum journey times proposed for road transport and we consider that such journeys should only be permissible under exceptional circumstances and that such justification should be provided to the Competent Authority before the journey is authorized.

Below we have set out the specific conditions which should apply to the commercial transport of dogs and cat by road.

Specific Conditions

Condition 1: Journey Times

Transports of cats under any circumstance is extremely stressful and should be avoided if possible.

CFSG proposes the following for all commercial road travel with loading and unloading time being considered as travel time:

Dogs and Cats: 6 hours with a 1 hour stop to enable toileting and water and then 6 more hours with an 11-hour rest period before transport can commence again for a maximum of 2 days.

NB: We recognise that this will require changing drivers owing to rules around maximum driving times

Puppies and Kittens (under 6 months): Maximum total journey time of 7 hours is allowable with a 2-hour break in the middle. If total journey length is greater than 7 hours the following rules apply:

3 hours with a 2 hour stop to enable feeding, digestion, water and clean out then 3 more hours followed by a 16-hour rest period before transport can commence again.

There needs to be regular monitoring of the animals throughout transport for signs of distress.

CFSG however would strongly support the ending of puppies and kittens being transported from outside of the U.K under the age of 6 months for both health and welfare reasons and therefore any measures around transportation over the hours set above should be focused on adult dogs and cats.

Pregnant bitches should not be transport from the point that they reach the half way stage of pregnancy which is just over 4 weeks since conception. An enlarged firm abdomen and any sign of movement from puppies is a good sign that the pregnant bitch should not be transported. (Under the New Zealand Animal Welfare Act, 'animal' includes '*any mammalian foetus...that is in the last half of its period of gestation or development*').

Condition 2 - Transport Condition

Vehicles

Studies which have been undertaken on dogs found that it is not just about length of journey but also the vehicle used and parameters such as that around size of the transport unit relative to dog or cat (height, width and length) with larger units promoting more rest. Experience from kenneling also makes clear that extraneous noise, especially from other dogs or cats, is a significant cause of stress in dogs that are confined as is consistent sight of other dogs or cats. Transporting in the upper level of stacked cages was linked to increased physiological distress.^v

An important factor in improving welfare in transport is to set vehicle standards which mean any commercial transport covered by new legislation must be in a standard type approved vehicle. That authorization should require the vehicle to be examined by APHA staff to ensure it is appropriate to the animals to be carried and particularly in relation to their size and species relative to cage size.

Litters of puppies or kittens aged less than eight weeks should be transported together. The transport of unweaned litters should only be undertaken when essential for welfare reasons and then must be transported with the mother.

Adult cats should always be transported singly. Many cats are trained to use a litter tray when restricted indoors and consideration should be given to allowing space to include one whilst also allowing the cat to stand, stretch and lie away from the tray in a bedded area.

Dogs from the same household may be transported in pairs if the combined weight of the dogs is less than 30Kg and the dogs cohabit amicably. The transport cage should be large enough to allow both dogs to lie flat without touching the sides of the cage or each other. It may be preferable to transport dogs from the same household in separate containers that allow the dogs sight and smell of each other. It is important to take the significantly differing sizes of individual dogs and cats into consideration when considering appropriate space allowances.

RSPCA commissioned research undertaken by Bristol University found that the presence of bedding resulted in reduced distress so it is advised that all units are provided with bedding for each animal being transported.

Temperature & Ventilation

The current regulations specify that ventilation on means of road transport used for long journeys must be able to maintain a temperature between 5°C and 30°C which we consider too wide a temperature range for dogs and cats. Under the Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018, the guidance notes for breeding dogs state: "*Insulation and temperature regulation in the kennels must aim to keep the ambient temperature in the dog sleeping accommodation above an absolute minimum of 10°C and below a maximum of 26°C.*" This would be a more appropriate temperature range for the transport of adult dogs and would be consistent with other legislation.

Under the Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018, the guidance for the Boarding of Cats states that "*insulation and temperature regulation in the sleeping area must aim to keep the temperature in some part of the sleeping area between 15 degrees and 26 degrees and never below the absolute minimum of 10 degrees.*" Again, this would be appropriate temperature range for the transport of cats.

For transport, other factors such as space, temperature, ventilation and humidity will also need consideration.

Puppies and kittens will need a higher minimum temperature than adult dogs and cats as they have a large surface area to volume ratio and will lose heat more quickly than an adult. We therefore believe a more limited temperature range should apply when puppies and kittens are being transported. This should be agreed with input from independent experts including vets and recognised animal behaviour and welfare experts.

Referring again to the Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018 it is set out that businesses looking after cats and dogs who are at risk of heat stress must have adequate temperature control and ventilation so vehicles transporting them should also be able to provide this.

Condition 3 - Fitness to Travel & Travel Logs

CFSG recommends that a 'Fitness to Travel Declaration' should be required to be completed by a Veterinary Surgeon, to include a behavioural assessment where required before dogs and cats are allowed to travel long distances for commercial purposes unless as part of an activity that is already regulated. If this is not feasible, then veterinary advice should be sought if there are any doubts by the person who is deemed responsible to declare the animal fit to travel. 'Commercial' is defined as 'being part of an economic activity'. This will include journeys where the transporter is paid directly or in kind for the activity, and also where the transport of the animal is an intrinsic element of the activity such as the movement of dogs and cats of any age to facilitate a change of ownership.

Article 5 (4) of Council Regulation (EC) No 1/2005 states that: "for long journeys between Member States and with third countries for domestic Equidae other than registered Equidae, and domestic animals of bovine, ovine, caprine and porcine species, transporters and organisers shall comply with the provisions on the journey log set out in Annex II." There is no such requirement for a journey log when dogs and cats are being transported and it is unclear why that is the case. We recommend that future legislation should require commercial transporters and organisers who are transporting adult dogs and cats for the 6+1 + 6 hours (3+2+3 for puppies and kittens) to also be required to comply with the provisions of a journey log, based on the templates for livestock species set out in Annex II of Regulation 1/2005. This would require transporters and organisers to appropriately plan the journey in advance. It would also mean that the journey log could be shared with all parties involved in the transport of dogs and cats, including border protection officers and APHA, to provide increased transparency and accountability.

Condition 5 – Penalties

Finally, CFSG strongly recommends that the penalties for breaching the legislation on animal transport are reviewed. In order to be effective, the penalties for breaching the legislation must be sufficient to be a deterrent. We are concerned that the current maximum sentence available for breaching The Welfare of Animals (Transport) (England) Order 2006, of just six months, is not a sufficient deterrent. We recommend that this is increased to five years, in line with the increased animal cruelty sentences as defined through the Animal Welfare (Sentencing) Act 2021 and in Scotland through the passage of the Animal Welfare (Penalties, Protections and Powers) Act 2020.

Enforcement is done by the APHA and LA Trading Standards. The enforcement needs to be treated the same as farm animal transport with road stops check on transporters and checks on journey logs. Resources need to be provided to support this.

Condition 4- Emergency Planning

Anyone transporting cats and dogs on a commercial basis must have a robust and well-planned contingency plan to safeguard animal welfare. There are of course some emergency situations which can arise such as vehicle break down or motorway blockages, problems loading, or an unwell or injured animal which could lead to the transporter going over that maximum time, and so there should be an accompanying protocol as to how that is handled around the journey time at the discretion of enforcement. This should enable the use of vets to inspect all animals at both loading and unloading to ensure that the animals are travelling in suitable conditions including the right temperature, space allowances, ventilation and bedding although we understand that this would require veterinary resources which could be difficult to source. If it is not possible for a veterinary inspection at un-loading, it may be possible for a vet to assess the animal(s) as soon as possible thereafter within a period of 48 hours. The ability to arrange emergency temporary accommodation, should also be considered. Sufficient food and water should be carried to cover the possibility of there being an unpreventable extension to the journey time.

In any future legislation, Government should provide guidance that sets out how animals can be protected from adverse weather conditions, particularly high temperatures which can be very dangerous for dogs and cats. There should also be an expectation that in certain weathers journeys are not undertaken, with penalties considered for those who expose animals to extreme weather conditions (such as very high or low temperatures) as a result of taking such journeys. Some animals are very fearful of certain weathers like storms or thunder and professional transporters should have plans in place to ensure welfare in all eventualities.

Summary

CFSG believes that a new system around the transportation of dogs and cats, with policy changes and improvements to checks and inspections, provides the opportunity to tackle the illegal activity around puppies and kittens. There is a perception that it is easy to illegally import dogs and cats into the UK. CFSG would return again to the most critical change which is raising the minimum age to import puppies and kittens to six months. Two additional measures CFSG would suggest are firstly, to include in any changes that the ban on the sale of third-party sellers is strengthened by including the rehoming of animals from abroad in the licensing regime with clear health and welfare requirements to safeguard the imported animal. Second to consider the number of dogs per vehicle for non-commercial travel. The majority of dog owners (92%) have 1 or 2 dogs with some households having 3 so a limit of 3 dogs per vehicle would cover the majority, however there could be considerations of a minimal number of exemptions to take into account families who may travel together and have two dogs per family or those legitimately showing dogs or cats.^{vi} Indeed, the latter has always been exempted with no obvious negative welfare consequences.

ⁱ Mills, D.S. & Mills, C.B. (2003). A survey of the behaviour of UK household dogs. Proceeding of the 4th International Veterinary Behaviour Meeting, Proceedings Number 352. Eds K. Seksel, G. Perry, D. Mills, D. Frank, E. Lindell, P. McGreevy, P. Pageat. Sydney, August 18 to 20, 2003. Pp. 93-98.

ⁱⁱ K Haafte, L. Eichstadt Forsythe, E. Stelow ; M. Bain (2017) Effects of a single preappointment dose of gabapentin on signs of stress in cats during transportation and veterinary examination, Journal of the American Veterinary Medical Association November 15, 2017, Vol. 251, No. 10, Pages 1175-1181

ⁱⁱⁱ Bradshaw, J. (2016). What is a cat and why can cats become stressed or distressed, in Ellis, S., Sparkes, A (ed.) Feline stress and health. Great Britain: International Cat Care, pp 24-25.

^{iv} J Orlando, B Case, A Thomson, E Griffith and B Sherman, (2015) Use of oral trazodone for sedation in cats: a pilot study *J Feline Med Surg* 2016 Jun;18(6):476-82.

^v report to RSPCA. Rooney NJ, Browne WJ, Mcindoe K, and Blackwell EJ Determining the most welfare compatible transport method for dogs, with particular emphasis on racing greyhounds. University of Bristol. 2019).

^{vi} Murray, W. J., Browne, M. A., Roberts, A., Whitmarsh, T. J. and Gruffydd-Jones, J. K. (2010). Number and ownership profiles of cats and dogs in the UK. *Veterinary Record* 166, 163-168