



Companion Animal Sector Council (CASC) Health and Welfare Strategy for Companion Animals

March 2025

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Introduction

The Companion Animal Sector Council (CASC) unites key members of the companion animal sector and provides a space for collaboration and problem-solving. By combining our expertise, we can develop a unified sector position concerning topics of interest.

The CASC membership have developed a detailed health and welfare strategy roadmap to address four main current areas of concern and deliver practical, real-world improvements in companion animal welfare.

The delivery of these initiatives could be achieved in several ways. Some will need to be Government led, whilst others can be delivered by sector stakeholders. Many are suitable for a co-delivery approach, with stakeholders conducting initial work to set a suitable framework based on detailed and specialist sector knowledge which can then be endorsed by Government, developed further or delivered jointly.

Recommendations

1. Legislation.

Legislation provides a framework for the delivery of good welfare. However, there are several areas of legislation that currently require urgent attention to ensure they are delivering their aims. In all areas the identified weaknesses in current legislation should be addressed as a priority above the introduction of new initiatives. This would ensure that ineffective and inefficient regulations and guidance are optimised prior to adding further burden on owners and regulators. It also allows lessons learned to be carried forward into new legislation and avoid repeating past mistakes.

Stakeholder engagement is a vital part of any reform or development work as they have the best insight into the working and impact of proposals. Many stakeholders, including keepers, are supportive of regulation to improve welfare but can become disengaged if excluded from the development process.

Licencing of Activities Involving Animals (LAIA)

Introduced in 2018 this piece of legislation replaced and updated a raft of old legislation. However, issues with its development and subsequent delivery have reduced its potentially positive impacts. These should be addressed as a matter of priority.

1. Post Implementation Review (PIR) Report

The published LAIA PIR report was disappointingly brief and, in many areas, did not acknowledge or address the considerable concerns raised by CASC and other stakeholders. These concerns appear to have been dismissed creating further frustration amongst stakeholders as to whether the identified issues are likely to be addressed as there is little in the way of recommendations for future work, indications of workstreams to be implemented following the review or the timescale for them.

RECOMMENDED ACTION	POTENTIAL DELIVERY ROUTE & PROCESS
Given the lack of detail contained in the PIR report future workstreams and delivery timeframes should be confirmed. CASC, along with other relevant stakeholder groups must be engaged with the work from an early stage.	Defra Identify LAIA workstreams to be taken forward and define a timeline for them.

2. Guidance documents (in relation to selling animals as pets and animal exhibits).

The guidance documents were originally produced in a way that excluded input from many stakeholders, including those being regulated. Pet shops are regulated and licenced businesses subject to inspection and daily scrutiny by the public. They are often managed by specialists who may have many years experience of keeping animals and so can be one of the best sources of companion animals for pet keepers. This sector had little input into the development of the relevant current LAIA guidance documents which means the guidance is often far too prescriptive, detailed and bureaucratic, concentrating on administration rather than welfare as well as including errors, duplications and ineffective processes. The result of this poor guidance is that those being regulated are negatively affected with no discernible welfare improvements, whilst those delivering the regulations are unclear

about the requirements. This has impacted business and impeded growth, whilst placing additional and unnecessary burdens on Local Authorities (LA).

CASC has delivered a detailed review of the existing guidance and will review its future work on the guidance considering feedback from Defra following the PIR report publication.

RECOMMENDED ACTION	POTENTIAL DELIVERY ROUTE & PROCESS
<p>Review the guidance relating to selling animals as pets and animal exhibits.</p> <p>Factors hindering business but that do not demonstrably deliver welfare improvements should be reviewed. The aim should be to simplify the guidance with a more common-sense approach to provide more clarity to both licensees and licensors without compromising welfare.</p> <p>Amendments should be based on scientific opinion and expert input from private animal keepers and animal related businesses which is the largest repository of specialist husbandry knowledge. Where scientific data is incomplete, safeguarding animal welfare should be carefully considered alongside other factors.</p>	<p>Defra and Stakeholder co-development</p> <p>CASC members, including LA, licenced operations, sector representatives and keepers have already dedicated considerable time to proposals for more effective guidance. These stakeholders have been involved with the regulations since 2018 and are best placed to offer insight into the issues and propose solutions. These proposals will be updated once a clear timeline for work is made available.</p> <p>Defra should assess the proposals and make amendments to the guidance where appropriate.</p> <p>This route allows for stakeholder led improvement and reduced burden on Government.</p> <p>Full details of changes previously proposed by CASC can be found in our 2023 PIR report and 2022 recommendations for changes to the guidance. The recommendations for changes to the guidance will need to be updated to consider the latest information.</p>

3. Delivery of LAIA regulations

As part of its work feeding into the LAIA PIR process CASC conducted stakeholder surveys of LA, inspectors, pet selling businesses and animal exhibits. These surveys identified major concerns around the delivery of the LAIA regulations which in many cases were consistent across the different stakeholder groups. Across England the quality and training of inspectors, cost and fee structures and interpretation of the guidance is inconsistent, resulting in a post code lottery for operators. This contrasts with the aims of the legislation which was to simplify and standardise the process and represents a major failure of the regulations.

Local authorities consistently report resource limitations that hinder effective licensing implementation. This includes both insufficient inspectors with expertise in specialised areas like animal welfare and inadequate staffing levels. Consequently, essential functions beyond basic licensing, such as investigating reports of unlicensed sellers, are often compromised.

RECOMMENDED ACTION	POTENTIAL DELIVERY ROUTE & PROCESS
<p>The training and abilities of inspectors is inconsistent due to variations in training content available.</p> <p>Defra should set a defined syllabus for inspector training and ensure that some practical training is included</p>	<p>Defra and Stakeholder co-development.</p> <p>Identify requirements in collaboration with LA and stakeholders and issue a defined syllabus that must be covered by training that aims to allow inspectors to become “suitably qualified”.</p> <p>Required or recommended specialist training could also be detailed. This could be delivered by a range of providers including commercial providers, trade organisations, hobbyist groups or charities.</p> <p>Consider the use of external inspectors (such as zookeepers or experienced private keepers) with specialist knowledge for some businesses where appropriate to reduce burdens on LA.</p>
<p>Review of fee levels and fee structures to improve consistency across LA and ensure that the fee’s charged only represent cost recovery.</p> <p>Excessive fees damage businesses and create an uneven playing field across different LA and between regulated and unregulated sellers.</p>	<p>Defra</p> <p>Survey all LA fee structures. Determine why there are differences and set a consistent structure for all LA.</p> <p>Survey all LA cost and determine how these are arrived at and why they differ across LA. Ensure they only allow for cost recovery.</p>
<p>Review resourcing of enforcement so that it is suitable reactive to evidence received. Many reports of possible licencing infringement, especially concerning unlicensed sellers, are never followed up.</p> <p>Review enforcement and inspection delivery and assess the cost and delivery benefits of introducing a centralised inspectorate for all welfare related regulations. This would improve consistency of licensing and the skills of inspectors by allowing the sharing of a single pool of suitably qualified staff.</p>	<p>Defra</p> <p>Assess the capacity of LA to deliver LAIA licencing and associated functions to determine if sufficient resource is available.</p> <p>Review the way specialist licensing is delivered in England to determine if a centralised inspectorate can deliver the function more effectively and with a lower total cost.</p>

4. Scope of LAIA

The regulations relate to “commercial activities” but for the selling of animals as pets the business test to identify commercial operators is confused and open to interpretation. This has resulted in ambiguity about who should be licensed, and even vexatious use of the confusion by anti pet-keeping organisations to encourage prosecutions.

There are also activities that are out of scope, such as 1-day sales events, pet fertility clinics or animal welfare establishments, which would be suitable for regulation under LAIA, by way of non-statutory guidance or codes of practice.

RECOMMENDED ACTION	POTENTIAL DELIVERY ROUTE & PROCESS
<p>Review the business test for the selling animals as pets to make it clearer. This needs to reflect the differences between the different taxa.</p>	<p>Defra and Stakeholder co-development</p> <p>The nuances inherent in the different taxa of animals sold mean that a “one size fits all” definition of commercial is difficult to define. Stakeholders should be asked for their views on what would be considered a commercial in their own individual sectors to provide a starting position for consideration.</p>
<p>Adapt the LAIA regulations to allow commercial operators to attend temporary sales events.</p> <p>Under the current regulations commercial operators cannot sell from a premises that is not their licensed premises. Additionally, because section 2 of the pet animal act 1951 has not been repealed (despite being previously set for repeal) then commercial operators cannot sell from temporary venues.</p> <p>LAIA would need to be adapted, and section 2 of the Pet Animals Act 1951 repealed to allow this. Additional guidance specific to the temporary sales environment would also need to be produced.</p>	<p>Defra and Stakeholder co-development</p> <p>Guidance would be needed for licensed operators selling at a temporary venue which could be inserted into the current selling animals as pets guidance. Stakeholders could draw up guidance for approval by Defra.</p> <p>Defra would need to make agreed changes to the guidance and facilitate repeal of section 2 of the Pet Animals Act 1951.</p> <p>This approach ensures welfare standards for commercial operators and provides guidance for event organisers to use in relation to non- commercial operators. Events may not need to be licensed in their own right, although they could be added as an additional section in LAIA for licensing if this was thought a better way to progress.</p>
<p>Produce guidance to ensure welfare standards at temporary shows/exhibitions where there are no animals sold.</p> <p>Shows and exhibitions (rabbit shows, birds, small mammals, etc.) where there is no selling are not commercial and so fall outside of the scope of LAIA in its current form. Currently they have no official guidance to set consistent welfare standards</p>	<p>Defra and/or Stakeholder co-development</p> <p>Guidance to ensure welfare at these temporary events can be drawn up by stakeholders for approval by Defra.</p> <p>The guidance can then form statutory guidance if these events were incorporated into LAIA as licensable events in the future. However, due to their non-commercial nature this could be problematic as LAIA relates specifically to commercial operations. Care also needs to be taken not to introduce regulation that is so onerous and costly that it excludes small hobby groups from organising events.</p> <p>Alternatively, they could form non-statutory guidance or code of practice for use by event organisers which could be endorsed by the Minister to add weight to them. This effectively then provides a guidance framework for these events even if they are not licensed.</p>

	<p>CASC has already started to examine this topic to determine what guidance could be produced.</p>
<p>Develop welfare standards for animal collections held by educational establishments.</p> <p>Educational establishments that hold large collections of animals do not currently fall into scope for licensing. They do not sell animals, are not zoo's and are not animal exhibits as currently defined. This means that there is an inconsistency across establishments, with some being licenced and others not. Standards of care can be variable as there are no agreed standard guidelines.</p>	<p>Defra and/or Stakeholder co-development</p> <p>Guidance for welfare standards in these establishments can be drawn up by stakeholders. UK Animal Care Technicians (UKACT) has already started this process to develop a code of practice for their members.</p> <p>This guidance can then be used as non-statutory guidance endorsed by the minister and text inserted into the LAIA guidance document to show that these establishments are not licensable but are expected to meet the UKACT Guidance as a minimum standard.</p> <p>Alternatively, educational establishments can be added into LAIA as a section under animal exhibits with statutory guidance and inspection.</p>
<p>Rescue and rehoming establishments.</p> <p>Currently rescue and rehoming establishments are not within scope of LAIA. Welfare standards in this sector are variable and sometimes poor.</p> <p>Guidance and defined welfare standards would benefit this sector. However, it is very important that any regulatory regime is not so onerous or costly that it makes it impossible for small operations to run as this could have negative welfare impacts.</p>	<p>Defra and/or Stakeholder co-development</p> <p>Guidance can be drawn up by relevant stakeholders to reflect the unique operation type. Standards would need to reflect the nature of the operation (temporary homing for rescue/rehome and permanent for sanctuary) and the restricted resources and amateur nature of many operators.</p> <p>The guidance could then be developed as a code of practice or non-statutory guidance with ministerial endorsement, or if these establishments were bought into scope of LAIA then it could form the statutory guidance.</p> <p>Due to the lack of baseline data for this sector another approach could be to introduce a registration requirement with an annual return to provide basic data. This data could then be reviewed after 5 years to establish the size of the sector and if it justified a full licencing process or remained on a non-statutory footing.</p>
<p>The use of animals in film and media to ensure all animals used are protected.</p> <p>Currently the welfare of animals for use on film sets is only loosely regulated under the animal exhibits section of LAIA but there are no specific guidelines for this use. Additionally, non-licenced operators are not bound by any standards and this sector sees many animals</p>	<p>Defra and/or Stakeholder co-development</p> <p>Standards could be drawn up by stakeholders familiar with this specific use. Their use would then depend on the way forward identified by Defra. They could be incorporated into the LAIA guidance to ensure that licensed operators met minimum welfare standards or issued as ministerial endorsed guidance or code of practice to provide non-statutory guidance of the standards expected.</p>

supplied by agents who have no contact with the animals and do not own them.	If desired, then a new section for licensing could be added into LAIA specifically to address this sector with the guidance then introduced as statutory guidance.
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Dangerous Wild Animals Act (DWAA)

The DWAA legislation itself is adequate to meet its aims. However, since the legislation was introduced no guidance has been issued to aid enforcement or keeper compliance. This has resulted in wide variations in application of the regulations across LA. There have been several proposals being put forward, and some even being approved by the Local Government Association, but they have never been adopted.

RECOMMENDED ACTION	POTENTIAL DELIVERY ROUTE & PROCESS
Issue guidance to LA and applicants on administration of the DWAA requirements.	Defra and Stakeholder co-development CASC and others have previously produced proposed guidance to meet this aim which could be reviewed by CASC, and updated if necessary, relatively quickly. This should then be issued to LA and made available to applicants ensuring improved consistency across LA.

Zoo Licensing Act

The Zoo Licensing Act is draconian and prescriptive and contains conditions that do not advance welfare.

RECOMMENDED ACTION	POTENTIAL DELIVERY ROUTE & PROCESS
The Zoo Licensing Act guidance has been under review for an extended period. This should be completed and updated guidance issued.	Defra Defra have already commissioned the review of the guidance and this needs to be completed and issued with modifications to identify opportunities to simplify the requirements without affecting welfare.

Invasive Non-Native Species (INNS) Regulations

The INNS regulations require that rescue centres for INNS species should be licensed, and that animal cannot be rehomed, except from owner to owner. Whilst this is proper for some species it causes issue for listed species of freshwater terrapins. These are not truly invasive in the UK as they cannot breed under current climatic conditions, although they can survive. Because rescue centres cannot rehome them then they will not take the animals in. This leaves owners no choice except euthanasia or releasing them, and as owners will not readily accept euthanasia then they often release. This means that the current regulations encourage release into the wild.

The current list of species of concern is inherited post Brexit from the EU. Some plant and animal species were identified several years ago by the Government’s scientific experts as inappropriate listings for the UK, Ring-tailed Coati for example, but the list has still not been updated.

RECOMMENDED ACTION	POTENTIAL DELIVERY ROUTE & PROCESS
<p>Review the UK INNS regulations with the aim to allow rehoming of rescued freshwater terrapins.</p>	<p>Defra</p> <p>Freshwater terrapins are not invasive in the UK as they cannot breed, but they are capable of surviving in the wild. This reduces their risk as in invasive species, but they are subject to the same rehoming restrictions as truly invasive species which creates a welfare issue as they cannot be rehomed via rescue and rehoming operators.</p> <p>Modify the INNS regulations to allow rescue centres to hold freshwater terrapins without having to be licensed and allow rehoming by rescue centres. This should also allow the same solution to be applied to other species in the future which have the same characteristics.</p>
<p>Complete the revision of the list of INNS inherited from the EU to remove those species not considered to be invasive in the context of the UK (species previously named by the review recommendations from the Non-Native Species Secretariat).</p>	<p>Defra</p> <p>Remove species from the list of species of special concern that are not appropriate for the UK.</p>

Private Primate Keepers Licencing

The guidance for the new private primate keepers licensing is yet to be published. The first drafts of this were unworkable and included requirements more than that required by zoos (a direct contradiction of the legislation’s aims). The result of this would be that no private keeper could comply with the conditions, and it represented a ban by the back door. It is essential that any guidance enshrines the right of individuals to keep and breed animals, providing they meet the necessary requirements. The important outcome is the welfare and not who provides it. Any guidance should be based on the zoo standards, with modifications to reduce the requirements not relevant to the private keeper environment.

Additionally, with the legislation due to go live in 2026 there are now serious concerns from keepers and inspectors that there is sufficient time for licensing to take place prior to it’s introduction as there is no guidance available.

RECOMMENDED ACTION	POTENTIAL DELIVERY ROUTE & PROCESS
<p>Ensure that published guidance is appropriate and proportionate and delivers the intended outcomes.</p>	<p>Defra with Stakeholder input</p> <p>The final draft guidance should be reviewed by stakeholders, including keepers, as a matter of urgency and then the final guidance published with sufficient time for keepers to make any adaptations needed. The guidance should reflect Zoo Licensing standards, as this is the declared aim of the legislation, with removal of sections relevant to public displays.</p> <p>If this is not possible quickly then licensing should be delayed.</p>

Import regulations.

The post-BREXIT landscape has introduced additional controls in relation to the import of live animals into the UK from Europe.

For commercial operators the checks are defined in the Target Operating Model for importing, including the development of processing centres such as Sevington in Kent. The processing needs to be prompt to avoid compromising welfare during border checks. There are concerns that the impact on companion animals during the checking process has not been fully considered and that both capacity and experience will be insufficient to ensure there are no delays.

For private keepers the new controls have made it more difficult, and in some cases not possible to bring in pet animals. This has restricted availability of breeding stock, meaning that animals may not be able to be bred domestically as well as hindering conservation efforts.

RECOMMENDED ACTION	POTENTIAL DELIVERY ROUTE & PROCESS
<p>Review the new TOM border requirements to make sure they are suitable for all taxa and are appropriately resourced to prevent delays that can negatively affect welfare</p>	<p>APHA/Defra</p> <p>Engage with stakeholders, particularly commercial importers, to fully understand the requirements for preserving welfare during the required border inspections.</p> <p>Review the risk categorisation of pet species to ensure this is appropriate and not introducing unnecessary burdens on businesses and border staff.</p>
<p>Review regulations surrounding the import of pet birds to enable breeding stock to enter the UK whilst protecting biosecurity</p>	<p>APHA/Defra</p> <p>The current regulations for importation of pet birds by private owners have health certification and quarantine requirements that cannot be easily met. This is encouraging smuggling. The requirements should be reviewed and adapted to enable the process whilst preserving biosecurity.</p>

2. Owner Education

Although many companion animal owners keep their animals to good welfare standards some do not do so. The quality of welfare and issues seen vary greatly between taxa but many of the causes of lower welfare are attributable to lack of knowledge on the part of the owner.

This situation could be tackled by increasing owner education, primarily by increasing access to education materials to aid good decision making but with legislative measures used where appropriate. It is important that any legislative measures are proportional to encourage positive action and not punitive as bans, restrictions and prohibitions are not successful methods of improving welfare for companion animals.

Effort should be targeted at areas where the maximum benefit can be achieved.

RECOMMENDED ACTION	POTENTIAL DELIVERY ROUTE & PROCESS
<p>Identify education initiatives that could deliver welfare improvements for pet species, with priority given to areas of highest impact.</p> <p>Initiatives could be agreed between Government and sectors to enable sector led or co-developed initiatives with Government support and endorsement. This approach places less burden on Government and encourages a self-regulatory approach.</p>	<p>Defra and/or Stakeholder co-development</p> <ul style="list-style-type: none"> - Develop code of practice for a range of common pet species or taxa (Stakeholder) and officially adopt them (Defra), encouraging adoption across devolved administrations. - Encourage the use of voluntary pre-purchase training, such as The Pet Charity “Pet Know How” project (www.petknowhow.org) to help with good buying decisions, and with pet sellers to confirm the suitability of the new owner. (stakeholder with ministerial endorsement and Defra support) - Develop a curated source of care and educational material (such as The Pet Charity “Pet Portal” project) to provide a trusted source of online education. (stakeholder and Government co-development) - Encourage owners and vets to neuter rabbits (Stakeholder) - Adopt published codes of practice, such as the rabbit code of practice and encourage adoption across devolved administrations to ensure alignment across GB Governments (Defra) - Publish recommendations for indoor bird cage sizes - Publish nutritional recommendations for psittacines <p>This list would be constantly reviewed and added to as potential initiatives are identified. Government support and endorsement of work is essential to ensure continued engagement from stakeholders.</p>

3. Sale of animals with characteristics which negatively impact welfare.

The rise of selective breeding within all taxa of companion animals has resulted in the emergence of animals that display characteristics that negatively affect welfare. Additionally, “designer” animals that are physically changed or treated to achieve a desired effect are often imported, even if they are illegal in the UK. Examples include:

- Selectively bred animals which inherit a genetic trait which demonstrably and negatively affects health or welfare, e.g. brachycephalism, chondrodysplasia, "Spider Morph" Royal Pythons, absence of fur or scales
- Animals that are dyed or tattooed
- Animals that have unnecessary surgical modification

RECOMMENDED ACTION	POTENTIAL DELIVERY ROUTE & PROCESS
<p>Develop a list of strains/types of animals that would be considered to have an inherited or applied characteristic that demonstrably and negatively affects health or welfare</p>	<p>Defra and/or Stakeholder co-development</p> <p>Stakeholders could identify potential animal species/strains/morphs for inclusion onto a list of undesirable genotypes and surgical modifications. Criteria for inclusion should be agreed with Defra and the list reviewed regularly.</p> <p>Once undesirable animals are identified then measures could be introduced to reduce their prevalence. These could include:</p> <ul style="list-style-type: none"> - restricting the import and/or sale of listed animals (Defra) - publicity and educational campaigns to reduce demand (Stakeholder with Defra support) - restrict breeding of identified animals (Stakeholder) <p>This list would be constantly reviewed and added to as potential initiatives are identified. Government support and endorsement of work is essential to ensure continued engagement from stakeholders.</p>

4. Unregulated sales and prizes

Although the sales from commercial pet sellers is regulated, there are other areas that operate with no regulation. These include sales via the internet, private sales or sales at “breeders’ meetings”. Sales via the internet are particularly problematic as they typically involve transporting an animal to the purchaser. This is often achieved by using unauthorised transport methods, such as sending fish via Royal Mail.

Additionally, some animals are handed out as prizes to new owners who may not want them and have no idea of their requirements. This results in many of them being killed, abandoned or kept in unsuitable conditions as owners are unprepared for their care.

RECOMMENDED ACTION	POTENTIAL DELIVERY ROUTE & PROCESS
<p>Ban the giving of animals as prizes (this is already illegal in Scotland and Welsh LA will not allow the practice on council owned land)</p>	<p>Defra and/or Stakeholder co-development</p> <p>Giving animals as prizes would not be legal if they were sold in the manner that they are given away. This is a loophole in the Animal Welfare Act that is an unacceptable practice and should be reviewed.</p>
<p>Assess the opportunities to more effectively regulate the sale of animals via the internet, which should also include transport requirements.</p>	<p>Defra and/or Stakeholder co-development</p> <p>Selling animals as pets should be regulated, regardless of the sales route. Resource and effort should be allocated to identification of commercial sellers so that standards of welfare and transport can be enforced via LAIA for commercial sales via the internet.</p>
<p>Assess the introduction of a registration scheme for anyone selling an animal who is not licensed under LAIA.</p>	<p>Defra</p> <p>Introduce a registration scheme where all non-commercial sellers would need to register and receive a registration number. This registration number would need to be quoted on all adverts and invoices.</p> <p>Registration is a simpler and cheaper way to aid traceability, disease tracking and identification of unlicensed commercial sellers without the need for licensing and inspections. It also allows for the evaluation of the scale of selling via the internet.</p>

This summary is an overview of measures that CASC identifies as ways to improve welfare for companion animals. There is of course a lot of detail behind each of these issues and we welcome the opportunity to discuss each of them further. For any enquire related to CASC please contact the secretariat, Dave Perry, by emailing secretariat@casc.org.uk