



**Draft NI Animal Health & Welfare Strategic Framework consultation  
August 2019**

**(Deadline 30 September 2019)**

Written submission from Dominic Whitmee, Chief Executive of the Ornamental Aquatic Trade Association

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The Ornamental Aquatic Trade Association (OATA) represents more than 850 UK businesses which provide fish-keepers with everything they need to set up and maintain a successful home aquarium or garden pond, including retailers, breeders, importers and manufacturers, many of which are SMEs. We promote high welfare standards in the industry through a wide variety of initiatives, such as our Code of Conduct, customer care sheets and our Primary Authority scheme for pet shops. We also recognise that virtually every species in which we trade in is not native to the UK. So our industry has a responsibility to both educate customers about the need not to release fish or plants into the wild and ensure high standards of biosecurity when moving animals and plants around the world. We provide the industry with information on this, from our [Biosecurity Code](#) to our [Pet Code of Practice](#) for keepers and traders (in partnership with the Reptile & Exotic Pet Trade Association).

**Size of the industry in the UK**

- 4 million households own fish (that's 14% of the population).
- There are 100+million fish kept in aquariums and ponds (making fish the most populous pet).
- Fishkeepers spend £400 million a year on their hobby while pet owners in general spend around £6 billion a year on their pets (that's all pets) including foods, accessories and veterinary care.
- That generates taxes of more than £2 billion annually.
- 50,000 people are employed by the pet industry within the UK (we estimate around 12,000 are employed by aquatic-related businesses).
- Pets are good for our health and are estimated to save the NHS at least £2.45 billion every year (which could be a conservative estimate). Therefore the benefits of pet ownership in general, in terms of tax generated and NHS spending spared, is about £4.45 billion a year.

Our understanding of this proposed framework is that the main focus is farmed livestock but includes reference to companion animals (pets) and wildlife 'where there is a potential impact on human health or on the health of farmed animals'. Because the emphasis is not wholly or even largely on pets (under which fish would fall) we will give an overarching response rather than respond to individual questions.

We would support the outcomes and guiding principles outlined in the framework and applaud the emphasis on:

- Impact rather than delivery – this is an admirable goal to get away from a ‘tick box’ process and to focus on practical delivery. Our experiences with the Animal Activities Licensing review in England shows that focusing on paperwork does nothing to improve animal welfare.
- Responsibility for animal health and welfare lies primarily with the keepers – we commend this acknowledgement that keepers play the key role in animal welfare. We believe that education is always the key to happy and healthy pets, rather than bans or restrictions which are hard to enforce.
- Strong and reliable evidence – we would always support decisions being made by robust and independent scientific evidence and welcome the approach to focus on how this process is developed and used.

We note it is proposed a partnership body is established to support governance. We also note the current stakeholder group has no companion animal/pet representation. We would invite the group to feel free to call upon any of the UK pet trade associations ([OATA](#), [the Reptile and Exotic Pet Trade Association REPTA](#) or [Pet Industry Federation PIF](#)) to help if discussions involve companion animals. We are all UK associations and would be very happy to offer assistance around relevant trade/industry issues. There is also the Companion Animal Sector Council which brings together trade, keepers and welfare organisations which would also be happy to assist. The Pet Charity provides secretariat functions for this group (email contact is Dave Perry [dave.perry@thepetcharity.org.uk](mailto:dave.perry@thepetcharity.org.uk)).

Our concern is that decisions could be made that would have unknown or unrealised ramifications for the pet/companion animal or ornamental fish farm sectors because of a lack of relevant information. Therefore involving trade bodies in this partnership approach would certainly be important at that point.