



Response to Petition P-05-743: End the Exotic Pet Trade in Wales

Pet fish are good for people, their health, and the Welsh and UK economy. The trade supports the livelihoods of people in some of the world's poorest countries

We note that one of the main requests by this petitioner is for pet shop licences to be withdrawn from businesses to stop them trading. We would like to put some further context to that call.

We carried out Freedom of Information requests to local councils in 2014 and 2016 looking at pet shop licensing. From our 2016 report we found there were 145 shops in Wales being licensed by 20 councils. Of these 118 sold fish (just over 80% of licensed pet shops in Wales). That is a lot of shops to shut and livelihoods to lose (and it would be more if other exotic pets like reptiles and small furies are included).

It is worth remembering, what is not counted in any pet shop licensing statistic is the number of 'pet' shops that do not sell animals but everything else a pet owner needs. And behind all those are the companies which manufacture and supply food, accessories, tanks and medications. Cut off the supply to a significant proportion of pet animals and these shops and businesses will equally suffer from lack of trade.

Unfortunately we don't have figures for Wales but in the UK we estimate that:

- 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 point is that stopping the trade in exotic pets, whether it's tropical fish, birds, reptiles or small furies like gerbils and hamsters, takes out a significant proportion of the trade which ultimately affects all pet owners. Popular though they are, dogs, cats and rabbits alone cannot keep the pet industry going. We believe that the pet industry – including those importers,

wholesalers, manufacturers and retailers involved in exotic species – make a valuable contribution to Goal 1 of the Welsh Government’s Wellbeing of Future Generations Act. These businesses provide jobs and livelihoods to people in Wales – and indeed people in other parts of the world too (Goal 7).

We would also ask you to consider the unheard voice in the exotic pet debate – the people who catch tropical fish. We enclose a copy of [OATA’s Wild Caught Ornamental Fish: the trade, the benefits, the facts](#) which examines the benefits that tropical fish caught in the wild can bring to some of the remotest and poorest parts of the world. The people who catch wild fish do not have a voice in developed countries in a debate that threatens their livelihoods and the well-being of their families. What’s rarely discussed is the fact that, if best practice is followed as is the case across much of our industry, fish mortalities are low, welfare standards are high, and the benefits can be huge in terms of revenue, infrastructure, carbon fixation and in the lives of many people.

Our industry gives people living in Small Island Developing states, Least Developed Countries and countries classified by the UN as ‘countries of low human development’ the chance to develop a sustainable livelihood from the marine or freshwater resources on their doorstep, helping to meet UN Sustainable Development Target 14.7 which says: “By 2030, increase the economic benefits to Small Island developing States and least developed countries from the sustainable use of marine resources, including through sustainable management of fisheries, aquaculture and tourism.” This in turn actually encourages communities to preserve the environment where they live because it protects their livelihood. If these communities do not receive an income from these low volume, high value sustainable fisheries they are likely to turn to more environmentally damaging activities such as food fishing, slash and burn agriculture, logging or even mining.

Educating people to pick the right pet for their lifestyle and care for it properly is the key to happy and healthy pets

This petitioner calls ‘at the very least’ for an introduction of a positive list which seeks to limit the species that people can keep as pets. All animals have specific husbandry requirements which need to be understood by their owner, regardless of whether they are dogs, cats, small furrries, birds, reptiles or fish. That’s why we believe educating people to pick the right pet for their lifestyle and care for it properly is the key to happy, healthy pets. Reducing the number of animals that can be legally traded and kept as pets will only prejudice responsible businesses and keepers. We believe the solution lies in educating people in how to look after the animals they share their homes with, exotic or otherwise, while ensuring the law to manage illegally traded species is effective and properly enforced.

There is no justification for a positive list approach and it is a disproportionate approach in light of current evidence. There are no identified issues of concern with the species our industry imports. Species should only be restricted where it can be properly demonstrated, based on a scientific risk assessment, that they constitute some form of risk. Tropical fish present no risk because they cannot survive in the temperate climate of the UK and temperate fish are already subject to adequate controls and risk assessment.

The evidence for a problem is often exaggerated by NGOs and is not supported by wider scientific evidence and practical experience. Belgium has introduced a positive list of mammals but that list has been ignored by many owners that simply keep their animals undercover, selling any surplus quietly in Belgium or more openly to clients in other EU Member States. You might also be interested to know that when the Belgians undertook their assessments for a positive list of mammals, dogs and rabbits could not make it on the list. Clearly this was not considered politically acceptable so the criteria was reviewed and a further

assessment undertaken which enabled them to be included on the list. Such lists are therefore not necessarily representative of how hard it is to keep a particular species – which frankly calls into question the credibility of positive lists.

Before Sweden acceded to the EU reptile ownership was banned but upon accession, and a lifting of the ban, many reptiles came to light. Norway has also recently lifted a 40-year ban on reptile ownership and even the Norwegian Government acknowledged there has been a healthy private ownership of reptiles (estimated to be around 100,000) in the country. So there is evidence that these bans, including bans arising as a consequence of positive lists, do not stop ownership. Instead they drive it underground. We do not endorse illegal activity but any law that cannot get the majority of stakeholders to comply is not good law. And it also does nothing to protect animal welfare because sick animals may be denied veterinary attention if they are being kept illegally.

High standards for pet shops are to be welcomed and need to apply to ALL businesses to ensure good welfare

OATA has long campaigned to improve pet shop licensing across the UK (hence our FOI reports in 2014 and 2016). We are aware of the Scottish review, although we are not sure what, if any, progress has been made with this. In England, there is already a well-established review of animal establishment licensing (including pet shops), which includes developing mandatory model licensing conditions based on Chartered Institute of Environmental Health guidelines.

We have worked with fellow pet trade associations and Defra on this review because we want an outcome that sets high standards for ALL businesses which deal with animals – whether that's a 'bricks and mortar' shop or online. ALL businesses selling pets should face the same scrutiny, whether that's about meeting the same high standards of animal welfare, staff training to ensure they know about the species they sell and provision of high quality care information to customers who buy animals. Online businesses need to demonstrate this to the same standards as shops.

Another point we make repeatedly on this subject is that having well-trained inspectors who can enforce the legislation is equally important. Better enforcement of improved mandatory conditions will drive up standards for all businesses, which can only be a good thing. We would urge all UK administrations to follow Defra's lead in introducing an equivalent and consistent approach. As a UK representative body, you will understand that we hope high standards are mandatory across the whole of the UK so there are not different standards based on postcode.

Fish welfare and mortalities

Like any trade that exports and imports live animals, the welfare and mortality rates of exported ornamental fish is a highly emotive issue, and rightly so. Our industry relies on the provision of LIVE and HEALTHY stock. Where best practise is followed, mortalities at all stages along the supply chain have been reduced to very low levels, often achieving mortalities below 1% from exporters to importers, as confirmed by a Ministerial statement in the UK.

As an example, a 2014 report by Wabnitz & Nahacky examined fish collection in the Federated States of Micronesia, a set of small islands in the Pacific. These collectors and exporters had all received training in best practice in collection, handling, transport, holding and shipping from the Secretariat of the Pacific Communities (SPC), an international development organisation. It reported mortalities of less than 1% from collection to export and less than 1.4% at the importer in the United States. There's no reason to believe this level of survivability cannot be achieved across the globe if best practice methods are routinely

followed. In the UK many companies such as Maidenhead Aquatics and Tropical Marine Centre work with their supply chains to provide this type of training.

Codes of Practice

We note from the Wales Animal Health and Welfare Framework implementation plan that Codes of Practice for species are under review. You might be interested to know that we are currently working on a Good Practice Guide for Fishkeeping for Defra and would be very happy to send this to the committee. We will happily assist in any work that is done in this area though our preference would be for codes of practice that are consistent across the whole of the UK. Anything that drives up standards for all businesses involved in the sale of tropical fish is to be welcomed and you will find our industry plays its part in educating customers about the flora and fauna they sell.