



Submission of evidence to the Kept Animals Bill

11 November 2021

Introduction

Cats Protection, the UK's largest feline welfare charity, helps an estimated 200,000 cats and kittens a year through its national network which includes around 200 volunteer-run branches and 30 centres. Our advocacy work focusses on "Speaking up for cats", influencing policy and practice on issues relevant to cat welfare.

Summary of Cats Protection's recommendations

- Update pet travel regulations for cats including:
 - Banning the commercial and non-commercial importation of cats under 6 months of age
 - Banning the commercial and non-commercial importation of cats with mutilations, specifically cats which have been declawed as this is already a practice banned in the UK
 - Banning the commercial and non-commercial importation of cats which are more than 42 days pregnant
- Introduce regulations on cat breeding
- Introduce compulsory microchipping of pet cats
- Enhance enforcement of The Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018
- Introduce regulations to ban the manufacture, sale and use of snares

Evidence

1. Pet travel

1.1 The Kept Animals Bill seeks to amend the arrangements for pets travelling both commercially and non-commercially into the UK. Currently the clauses within the Bill will allow for regulations to be made which will prohibit or restrict the importation of a relevant animal (which includes cats, dogs and ferrets); which is below a specified age, has been mutilated, or is more than a specified number of days pregnant. Cats Protection is calling for the Bill to be more specific in regards to age, mutilation and the number of days pregnant cats can be when travelling commercially and non-commercially.

1.2 Cats Protection strongly believes that any proposals to prevent puppy smuggling must equally be applied to kittens. While puppies have historically been the focus of conversations relating to unscrupulous sellers, the reality is that the cat market is changing rapidly: Cats Protection's CATS (Cats and Their Stats) 2021 UK, has taken an extensive look at the market for cats and found that, according to their owners, more recently obtained cats are more likely to be pedigrees, more likely to have been bought (as opposed to adopted, taken on etc.) and for those cats that are bought, more likely to have been found online. This data is brand new and while Cats Protection appreciate the Government may not yet have been able to review, it really highlights how it would be prudent to include cats alongside dogs given market trends and their popularity as pets. The increasing trend for pedigrees does raise the risk that, in particular, they could be bred abroad and sold within the UK.

Percentage of pedigrees, moggies and cross-breeds obtained over time

	Total pet cat population	Cats obtained in the last year	Cats obtained 1-2 years ago	Cats obtained 3-5 years ago	Cats obtained more than 5 years ago
Moggy/domestic longhair or shorthair	65%	51%	55%	65%	74%
Pedigree ¹⁸	23%	36%	31%	23%	16%
Pedigree with paperwork ¹⁹	13%	25%	19%	12%	6%
Pedigree without paperwork ²⁰	10%	12%	12%	11%	9%
Cross-breed (non-moggy)	5%	6%	6%	6%	5%
Don't know	7%	7%	8%	7%	6%

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1.3 Alongside the findings from the CATS report, analysis of cat prices by Tech4Pets for Cats Protection across three pet selling websites (Gumtree, preloved and Pets4home) have found skyrocketing prices (June 2021 £474 versus June 2020 £327) and increasing numbers of adverts (June 2021 22,803 versus June 2020 10,477). The charity has evidence of kittens being advertised for sale with worldwide shipping as an option. Cats and kittens are extremely stressed by transportation over long distances, which in turn can suppress their immune systems so their risk of infectious disease and other stress-related illness is markedly increased by importation. Cats Protection has strong concerns that if action was only taken to tackle puppy smuggling, and the protections were not applied to cats then the focus of those looking to make a quick profit at the expense of animals may shift to cats and result in unintended welfare consequences for cats.

1.4 The charity would like there to be an increase in the minimum age that kittens can be moved into Great Britain under the commercial and non-commercial rules (including overseas charities and reputable foreign breeders) from 15 weeks to six months. This will ensure that young kittens have the same protection as puppies and prevent a potential surge in undeclared importation of sick kittens by unscrupulous breeders, who may shift their focus away from puppies. In addition, increasing the minimum age will make it more obvious if pet smugglers do try and bring across kittens under 6 months. The change in dentition from deciduous to permanent adult teeth occurs around 5-6 months of age can be used as a means to tell if a kitten is younger or older than 6 months.

1.5 The Department for the Environment, Food and Rural Affairs has previously introduced regulations on pet vending which clamp down on unscrupulous pet sellers by banning the sale of puppies **and kittens** under 6 months by anyone other than the breeder; giving dogs and cats equal protection. The current proposals in relation to pet travel do not maintain the consistency of this approach. If the minimum age a cat can be imported is not raised to 6 months then unscrupulous breeders and sellers from abroad could exploit a loophole and bring in young kittens to sell in the UK claiming that the seller is the breeder albeit the kitten was bred abroad.

1.6 Furthermore, a 2021 Freedom of Information request carried out by Cats Protection of APHA found that the number of cats seized at the UK border more than doubled between 2019 and 2020 and the majority were 'high value' breeds such as Scottish Folds, Maine Coons and Bengals². This supports our concern that

¹ Table from pg. 15, CATS 2021 UK, Cats Protection – www.cats.org.uk/stats

² Freedom of Information request of the Animal Plant and Health Agency carried out by Cats Protection in September 2021

to leave cats out and only prohibit importation of puppies under 6 months will have the consequence of fuelling the market in high value cat breeds from abroad.

1.7 According to data from the PDSA Animal Wellbeing 2021³ Report and Cats Protection's Cats and Their Stats (CATS) 2021 report, around 5% of cats obtained in the last year were obtained from an overseas source. Due to the different methodologies, this works out at between 48,000 (PAW) and 70,000 (CATS) cats. When compared to official figures, this results in somewhere between 14,000 and 40,000 cats missing from official data for overseas imports.

1.8 Cats Protection also encourages the introduction of a ban on the commercial and non-commercial movement into Great Britain of cats which are 42 or more days pregnant. Cats need this protection on welfare grounds as well as to limit the potential for pregnant cats to be imported for onward sale of their kittens. Long journeys are very stressful for cats, especially when pregnant. The stress of travel for a pregnant cat can lead to risks the mother (queen) cat of miscarrying and for the welfare of her kittens including cannibalisation by the queen.

1.9 The charity is also concerned that the current proposals take steps to limit the importation of dogs with mutilations including ear cropping but ignore cats with mutilations. Cats Protection is calling for a ban on the importation of any cat which has been de-clawed. It is already illegal for cats to be de-clawed in the UK. Cats with this mutilation should also be banned from commercial and non-commercial importation both to deter any market or interest in de-clawed cats and in line with the UK ensuring the highest standards of cat welfare are consistently maintained.

1.10 Cats Protection believes that the current proposal to allow five dogs, cats and ferrets per motor vehicle is insufficient to prevent unscrupulous traders bringing in animals for sale under the guise of them being for non-commercial purposes. According to Cats Protection's CATS (Cats and Their Stats) report 2021, the average number of cats per household is 1.5; just 4% of cat owners have 4 or more cats. Cats Protection would like to see the maximum number of animals per vehicle reduced to three.

Recommendation 1: Ban the commercial and non-commercial importation of cats under 6 months of age.

Cats Protection support amendment 2

Recommendation 2: Ban the commercial and non-commercial importation of cats with mutilations, specifically cats which have been declawed as this is already a practice banned in the UK.

Recommendation 3: Ban the commercial and non-commercial importation of cats which are more than 42 days pregnant.

Recommendation 4: The number of dogs, cats and ferrets that may enter Great Britain in a non-commercial motor should be limited to three, rather than five

Cats Protection support amendment 1

2. Cat breeding and selling

2.1 In recent years the Government has introduced the Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018. These regulations banned the commercial sale of kittens under 8 weeks old and introduced new licence requirements for pet vendors. They also updated regulations related to dog breeding. However, currently in England there are no regulations governing cat breeding.

³ PDSA Animal Wellbeing (PAW) Report 2021

2.2 Regulations requiring a licence for cat breeding came into force in Scotland in September 2021. This bill presents an opportunity for England to similarly ensure that good breeding welfare is in place to protect kittens and their mother cats bred in England. The key advantage of regulation is that it creates a legal framework with associated safeguards and inspection regimes. It is inconsistent with cat welfare for cat welfare to be protected if a cat breeds in one part of the UK and not in another.

2.3 There are also concerns regarding cats being bred with conformations which could affect the health and welfare of the cat or its offspring. Selectively breeding to maintain recognised pedigree breeds unfortunately comes at a welfare cost to the cat. By selectively breeding to increase the similarity or homogeneity and reduce the random variability within a given breed gene pool, the chances of undesirable and in some cases harmful genetic anomalies being expressed are increased. Genetic testing has allowed identification of a number of inherited diseases in certain breeds. These tests can be used to help control inherited diseases being passed on by not breeding with affected cats. An example of where this has been effective is the testing for polycystic kidney disease (PKD) in Persian cats.

2.4 However, for some breeds such as the Scottish fold or Munchkin, an inherited disorder is specifically bred for; the characteristics of the breed being produced by a gene mutation. Although the desired breed characteristics are achieved, the inherited disorder will be detrimental to the health of the cat and negatively affect its quality of life. Such genetically associated conditions are often considered normal for a cat or its breed despite it having an adverse effect on the cat's quality of life. This can be seen with breeds which rely on poor conformation as their main breed characteristic, for example the brachycephalic or flat-faced Persian which experiences breathing difficulties, eye problems, skin infections and difficulty eating as a result of its skull conformation. These cats will experience lifelong suffering as a result of being 'designed' to have a very flat face.

2.5 As shown in the table accompanying 1.2, according to owners 36% of cats obtained in the March 2020 to March 2021 period were pedigrees; of those obtained more than five years ago, just 16% were pedigrees according to their owners. This shows significant growth in the market for pedigrees. This, combined with the findings from our FOIs relating to imported cats (1.5), that 'high value' breeds such as Scottish Folds, were the most commonly seized cats at UK borders, shows the need for the regulation of cat breeding (as has already been done in Scotland), but also the need to prohibit the import of kittens under 6 months to stop the loophole of dealers breeding abroad and importing for sale.

2.6 Better enforcement of The Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018 is also needed to ensure that commercial sellers include their licence number when advertising cats for sales. Those buying cats are increasing going online to find a cat, with 68% of purchased cats being found online in the last year according to Cats Protection's Cats and Their Stats (CATS) 2021 report. According to their owners, more recently obtained cats are significantly more likely to be pedigrees – of those cats obtained in the last year 36% were pedigrees – compared to just 16% for those obtained over 5 years ago – with more high value cats being sought, there is a risk that even more unscrupulous sellers look to exploit cats (and consumers) for profit

Recommendation 4: Regulate cat breeding for anyone breeding 2 or more litters of cats in a 12 month period. Introduce welfare safeguards such as prohibiting any single female cat from having more than 2 litters of kittens in 12 months and more than 8 litters in their lifetime and prevent anyone from breeding from a cat if it can reasonably be expected, on the basis of its genotype, conformation, behaviour or state of health, that breeding from it could have a detrimental effect on its health or welfare or the health or welfare of its offspring.

Recommendation 5: Ensure all commercial sellers are displaying their licence number when advertising cats for sale.

3. Compulsory microchipping of owned cats

3.1 Microchipping of dogs has been in force since 2016 and the Government committed to make microchipping of owned cats compulsory in their 2019 Manifesto and reiterated this commitment in their Action Plan for Animal welfare in 2021. This Bill presents an opportunity to bring parity between cats and dogs through introducing regulations for compulsory microchipping of owned cats.

3.2 Cats Protection's Cats and Their Stats (CATS) 2021 report shows that 2.8 million (26%) owned cats are not microchipped. Microchipping is a safe and permanent way to identify an owned cat. Cats Protection advises that an owned cat is microchipped.

3.3 Making microchipping compulsory for owned cats in England is to drive up the numbers of owned cats that are microchipped in England. This will help to:

- Reunite more lost cats with their owners
- Ensure owners are informed and able to be involved in decisions about their cat's veterinary care, for example if they were hit by a car and taken to a veterinary practice by a member of the public
- Inform more owners and provide closure in the sad event that their cat is fatally injured and scanned for a microchip
- To provide easier detection of cats in the event of theft
- Better traceability of individual owned cats should there be a significant disease outbreak such as rabies.

Recommendation 6: Introduce compulsory microchipping of owned cats.

4. Ban on snares

4.1 The Government committed to a consultation on snares in their Action Plan for Animal Welfare in May 2021. The Welsh Government have committed to Ban snares in Wales and this Bill offers the opportunity for a ban on snares in England to prevent animals from suffering.

4.2 Snares are cruel and inhumane and can cause long painful deaths for animals trapped. Snares are frequently left unchecked. A report by DEFRA on snares found that almost 30% of rabbit snare operators had caught a cat⁴.

Recommendation 7: Ban the manufacture, sale and use of snare traps.

For more information or to discuss this submission further please contact the Advocacy & Government Relations team at Cats Protection by emailing: advocacy@cats.org.uk

⁴ Defra (2012) Determining the extent and use and humaneness of snares in England and Wales