

Thank you for opportunity to comment on the commercial and non-commercial movement of pets into Great Britain.

Understanding Animal Research (UAR) is a not-for-profit member organisation that seeks to explain how animals are used in scientific research. Our members include universities, government agencies, industry and charity bodies, research funders and learned societies.

UAR is strongly supportive of the key proposed measures for pets. However we would seek a specific exemption for animals destined for laboratories. The reason for this is that their welfare is already regulated in a way that reflects their different ethical context.

Research animals are working animals typically bred especially for research to be clean, healthy or of harmful phenotype as required, content in a lab environment and with associated activities such as handling, as well as being genetically consistent or specific, with species-specific considerations as part of their care requirements. In some cases, wild animals can be investigated such as in conservation work.

Animals are essential in research, where there is no alternative, to study unmet health needs. Without such research, development of new treatments for life changing diseases in humans and animals would simply come to a halt. This disease can occur in domestic, wild or farming settings and for a wide range of reasons including human and animal disease, conservation or toxicology and the complex interplay between these different areas.

Where necessary, research animals may need to be transported at ages or health conditions outside those which would be considered acceptable for domestic, household animals. Study of developmental disorders may require transport of pregnant or new-born animals, without which it would be impossible to properly understand the disease. For this reason, it must be possible to transport research animals of any age where failing to do so would lead to greater suffering overall.

It is in the interest of those who carry out animal research to ensure that their welfare is closely monitored, and the animals is not under any unnecessary stress. To this end, the sector works within the Laboratory Animal Science Association (LASA) document (Laboratory Animals – Good transportation practice), which provides clear guidelines on food and water, space, temperature and transport of animals with underlying conditions. New legislation should not introduce immutable barriers to the most appropriate course of action, particularly if powers are to be granted to ministers within departments that have no formal input to the ethical review process of other departments.

The business of updating regulations applying to research animals should be done by the departments that currently have responsibility for, and expertise in, legislating for research animals. A specific exemption for lab animals would be a cleaner legal route to avoiding clashes and consistent with the principles of better regulation.

Current regulations

Research animals are transported in accordance with numerous laws, regulations and agreements including, depending on species, CITES, and the principles of the European Convention on the Protection of Animals during International Transport (ETS No. 65 and ETS No. 193), having regard to the Resolution on the acquisition and transport of laboratory animals, adopted by the May 1997 Multilateral Consultation of the Parties to Convention ETS No. 123 and, to EU Regulation (EC) 1/2005 on the protection of animals during transport, implemented in England by The Welfare of Animals (Transport) (England) Order 2006 and by parallel legislation in Scotland, Wales and Northern Ireland.

Every aspect of the animals' care is also governed by a code of practice, which states:

Prior to entry to a licensed establishment, an animal's welfare during transport is governed by applicable international, EU and UK law. The enforcement authority in England, Wales and Scotland is the Animal and Plant Health Agency (APHA), and in Northern Ireland the Department of Agriculture and Rural Development.

Once an animal enters a licensed establishment and becomes a protected animal under ASPA its welfare during any subsequent transport is **additionally regulated under the Animals (Scientific Procedures) Act 1986 (ASPA)**. Both project licence holders and establishment licence holders have responsibilities relating to transport of protected animals. Under ASPA, the person legally accountable for the transport of the animals (the sending establishment licence holder) has the overall accountability for the planning, carrying out and completion of the whole journey, regardless of whether duties are subcontracted or delegated to other parties during transport.

The sending establishment licence holder should check that all necessary arrangements are in place to fulfil standard condition 4(6) of their establishment licence – namely that the conditions under which a protected animal is transported are appropriate for the animal's health and well-being. Once the animals have been received at their destination, legal accountability for their care transfers to the receiving establishment licence holder, or, in the case of establishments that are not licensed, the animal is discharged from ASPA.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/388535/CoPanimalsWeb.pdf

The Animals in Science Regulation Unit within the Home Office has responsibility for updating the Code of Practice, which can now be drafted in maintain control over ethical transport by having more or less regard to otherwise universally applicable laws.