To give a brief background to my involvement in the reptile industry and hobby

I acquired my first reptile for my fifth birthday in 1964 and I have been a keeper ever since.

Being profoundly dyslexic, academia was not career path open to me, although I did spend ten years in collaboration with Queen Elizabeth College (University of London) developing new and more humane way to extract venom from a variety of animals.

For a short time after leaving education I worked at a zoo, but it quickly became apparent that this was not a career for me and I started a business importing reptiles for the pet trade. I rapidly developed this into a business supplying not only livestock but also equipment, food and sundries required to keep the animals alive. At the time the concept of equipment specially tailored to keeping reptiles was something of a novel idea and most products were designed for other purposes, such as using aquarium lighting for vivaria.

In 1991 I started the Reptilian Magazine, the first magazine in the UK for people interested in reptiles and in 2001 I became chair of the Federation of British Herpetologists (FBH). In 2005 I took on my current role at the Reptile & Exotic Pet Trade Association (REPTA) and in 2012 was elected chair of the European Association of Reptile & Amphibian Keepers (EUARK).
It is crucial that all policies regarding animal welfare and the pet trade should be based on clear robust science, not speculation, assumption or prejudices, which is unfortunately not the case with the recent BVA/BVZS Policy Statement calling for a ban on the importation of wild caught reptiles. I would have unreservedly welcomed a full and frank discussion on the key concerns raised in the document but this opportunity has now been lost by the publication of a policy without first examining the evidence. Reaching a conclusion before you have examined the facts is both unacceptable and unscientific and is suggestive of a preconceived agenda, which taints the policy and conclusion.

I would also question the statement made on the BVA website that they are: “…working with the pet industry”. In fact the BVA has had absolutely no discussion or involvement with the industry bodies that represent the exotic or the aquatic pet trade, i.e. the key stakeholders and formulated this policy without consultation.

Regrettably, the BVA and the BVZS are not alone in this unscientific approach to important animal welfare and conservation issues as the FVE have also adopted a similar strategy, disregarding science and basing policy on speculation and prejudice. This became abundantly clear at their conference “Import & keeping of exotic animals in Europe” held in Brussels in October 2012 when they declined to invite a single speaker from industry.
The earliest record of a reptile being kept as a pet dates back nearly 400 years to 1625, when the then Bishop of London, William Laud, acquired a spur-thighed tortoise which he kept at the Palace of Fulham. When he became the Archbishop of Canterbury in 1633, the tortoise moved with him to Lambeth Palace where it outlived its owner by 108 years. Both suffered the same fate of having their heads chopped off, one by a disgruntled employer in 1645, the other by a careless gardener in 1753. It is an interesting statistic that the first recorded reptile being kept as a pet lived for an impressive 128 years and the shell of the tortoise still resides today at Lambeth Palace.

The Tower of London Menagerie began in 1243 and it is unclear when they first started keeping reptiles, but the first documented breeding took place in 1828 when a pair of pythons bred and laid 14 eggs after they had been in the collection for two years. Alfred Cops was the last keeper of the Menagerie at the Tower and when it closed in 1832 all of the animals were moved to where we are today at London Zoo.
Historical accounts of keeping reptiles as pets goes back many years and the first book published on keeping reptiles was produced by the German herpetologist Johann Matthaus Bechstein in 1797. The first book on reptile keeping published in English was the Vivarium, produced in 1897 by the Reverend George Bateman. Whilst husbandry has improved immeasurably over the years, reading the book today modern keepers will be not unfamiliar with many of the methods used back then.

The Amateur Aquarist & Reptilian Review started in 1924, although this 1927 copy is the earliest we have found so far, and what is interesting about this publication is just how popular reptile keeping was back in the 1920s. The magazine covered all aspects of herpetology, including captive breeding, and it is apparent that keeping reptiles was well established by this time.

The other interesting issue is the species which were available at the time. It is often said that there has never been a legal trade in Australian reptiles, but the fact that advertisements clearly demonstrate there was a thriving legal trade in Australian reptiles right up until the 1950s. Australia did not prohibit commercial export of live fauna until the 1960’s.
There was certainly a strong trade and interest in keeping reptiles and amphibians from the 1920’s but the growth in popularity really started in the mid 1970s, when the trade was almost exclusively in wild-caught animals. It was not until the late 1980s when captive breeding started in earnest and by the 1990s a real explosion in popularity occurred.

There are undoubtedly many reasons why reptiles have increased in popularity but I think without question the most significant reasons are increased ease of captive maintenance and suitability for changing lifestyles. When I started reptile keeping it was regarded a “black art”, unlike aquatics (fish keeping), and there was no specific equipment available. Even in the early seventies to successfully keep a reptile you had to be dedicated, enthusiastic and ingenious in adapting other equipment to meet the needs.

This has changed since the late seventies when Zoo Med in the USA became the first company to develop products for reptiles in 1977 and today the reptile product market is globally a billion dollar industry, with over 8,000 product lines which are constantly expanding.
Just as reptile keeping industry has been long established, so has the ‘anti reptile keeping industry’, which is a huge global industry led by a handful of dedicated individuals. The campaign to ban the keeping of reptiles is claimed to be based on science, as we can see from the 1995 article published in the Vancouver Sun, although interestingly the claim that the individual concerned had a PhD from Copenhagen University proved to be untrue.

There were other so-called academic institutions involved with the anti-reptile industry, although their credentials and qualifications are questionable and their links to recognised scientific institutions indeterminate.

Fast forward seventeen years to 2012 and the same tactics are still employed, with this article published in The Biologist being a classic example. Claimed by the authors to be a peer-reviewed paper published in a leading scientific journal, the article was actually printed in a popular magazine for debating scientific issues and including opinion pieces such as this.

This article makes the claim that 75% of reptiles die in their first year of captivity, a figure derived by taking two unknown variables (estimates) and making a hypothesis, which made good headlines but was actually rather poor science. By contrast, a study at the University of Kent as part of an Applied Science degree came up with a far more credible figure of 2.35% mortality in the first year of ownership. Further work is currently being conducted at the Durrell Institute, based at the University of Kent, and this is due for publication shortly. Generally captive reptiles are significantly longer lived than their wild counterparts.
Disingenuous pseudoscientific publications are not just the preserve of the anti-reptile-keeping lobby, in 2001 the RSPCA commissioned Pro Wildlife, a German-based Animal Rights organisation, to write a report on reptiles “Morbidity & Mortality”. This report was submitted to the EU Scientific Review Group (SRG) with the objective of calling for a ban on importing reptiles into the EU using the EU Wildlife Trade Regulations 33/97. Fortunately, being a science-based group the SRG, could see through the glossy presentation and dismissed the document out of hand. Despite the robust dismissal of the report by the SRG it is still touted by those opposed to animals in captivity to this day and frequently cited.

The ENDCAP report of 2012 is another example of disingenuous interpretation of facts to suite a political ideology that animals should not be kept in captivity.
The cornerstone of the Animal Rights argument is the use of emotive language, although sustainable utilisation of wildlife is actually the cornerstone of conservation and is supported and endorsed by successive UK governments, CITES, CBD, and genuine conservation organisations, such as the Worldwide Fund for Nature (WWF).

When wild animals are collected for the pet trade the key objective is to keep that animal alive and healthy. An unhealthy, stressed or otherwise compromised animal is of little or no use in trade and, therefore, trade has an absolute vested interest in ensuring high standards.

A dead or sick animal has no value unlike an animal “ripped from the wild” in order to put food on your plate (think about that next time you enjoy fish & chips). Sustainable collection for the pet trade is also not a biological dead end as often the intent will be for it to thrive in order that it will reproduce and may have real conservation benefits, including maintaining a captive gene pool to insure against wild population crises.
Just what is a ‘wild animal’ is actually a critically important issue as the term is frequently exploited by those who oppose the keeping of animals in captivity. The fundamental argument seems to be that it is fine to keep “domestic” animals but not “wild” animals. Fortunately we have good legal basis for defining a wild animal as an animal taken from the wild (natural) environment, so if an animal is bred in captivity it is not a wild animal, clear and simple. If we want an example of a legal framework for this then we need look no further than fish farming, as if a supermarket offered a trout bred on a farm as a “wild” fish they would have legal difficulties and I can see no valid reason why this does not, therefore, apply to the pet trade.

There are a number of definitions of domestication, but in essence it involves man’s influence on the form and function of an animal. There are now many species of reptile which have been selectively bred in captivity (over many generations) to produce colour, pattern and even behavioural modifications which have resulted in animals far removed form their wild counterparts. A prime example is the royal or ball python, selectively bred by man for form (i.e. colour and pattern), with over 1,500 morphs available today and also function.

Domesticated specimens are generally more docile than their wild ancestors and have been selectively bred to feed more regularly and accept convenient (and cheap) food, typically frozen (defrosted) mice or rats. Many species of reptiles, including corn snakes, bearded dragons, leopard geckos and too many others to list, have been domesticated and are now widely considered mainstream pets. Even species which we would normally view as more specialist pets, have now been domesticated to the point where they are substantially different from the wild form.
CITES (the Convention on International Trade in Endangered Species of Wild Fauna and Flora) is an international trade agreement (convention) to protect endangered species from over-exploitation. This is enshrined in EU law under the EU Wildlife Trade Regulations (338/97) and in the UK under the Control of Trade in Endangered Species Regulations (COTES). Not all rare or endangered species are protected by CITES as the Convention only protects species that are traded internationally and domestic use is not controlled.

CITES sets Appendices (Annexes in the EU) which differentiate between perceived levels of threat by trade, for example, trade in Appendix I (Annex A) species from the wild is prohibited. CITES sets quotas on numbers that can be taken and it also sets source codes which differentiate between wild-taken specimens and specimens bred in captivity. CITES data shows that in terms of the global live trade in reptiles 21.3% are taken from the wild.
The majority of reptile species kept and traded are not CITES listed which presents issues with comparing trade in wild-caught and captive-bred specimens. Those who oppose the keeping of reptiles in captivity still claim that 95% of reptiles traded are taken from the wild, whilst this is palpably untrue (CITES data alone disproves this claim), although establishing accurate data is difficult. This is an important issue I will revisit later.

The data from the Eurostats trade database shows the overall numbers of reptiles imported into the EU and UK on an annual basis. This shows imports peaked in the EU in 2007 and have been steadily declining since, whilst UK numbers peaked in 2008 and are also falling.

There is also some illegal trade, but identifying the extent of intentional smuggling (trafficking) is actually quite difficult. The data from HMRC CITES enforcement shows seizures of live animals, the majority of which are for administrative issues, paperwork offences, packing issues, not animals being systematically and criminally smuggled. I estimate that less than 5% of animals seized are what could truly be defined as illegal trade, i.e. trafficking of animals illegally taken from the wild.
The BVA/BVZS, are calling for a ban on the importation of live reptiles into the EU on the grounds of concern for animal welfare but remain silent on the issue of importation of reptile skins or meat, which I personally find somewhat surprising. To put this into context, in 2012 1,650,861 live reptiles were imported into the EU (the majority not CITES endangered species) with the intent of keeping the animal alive and healthy and (ultimately) for many for them to reproduce. This is opposed by the BVA/BVZS. In the same period the skin trade imported 2,184,709 reptiles which had been inhumanely killed, the majority of which were endangered CITES species.

This trade is unopposed and the BVA/BVZS do not have a policy position on a trade with a 100% mortality rate?

We know that mortality in transit of live reptiles for the pet trade is absolutely minimal (which will be covered in detail in a moment) and that high animal welfare standards are employed. By contrast, the skin trade involves inhumane and even barbaric practices, such as hanging animals by their top jaw and ramming a hosepipe down its throat for an unpleasant and protracted death, yet is unopposed by the organisations which have an anti-live-reptile imports policy.
The golden mantella is a small and very beautiful species of frog endemic to the island of Madagascar. It is listed as critically endangered on the IUCN red list of threatened species but is not banned from international trade, being listed on CITES Appendix II (Annex B). The reason it is so listed is that its last chance of survival is sustainable utilisation, i.e. collection for the pet trade, without which its habitat will be destroyed for development. If the BVA/BVZS are successful in their demands to ban the trade in wild-caught reptiles and amphibians, then responsibility for extinction in the wild of this amazing creature will lie with them.

That might be a slight over simplification of the facts, but the survival of this species is inextricably linked with sustainable utilisation. Like so many species in Madagascar (and other countries), the threat is not exploitation for the pet trade, indeed the reverse is true. Habitat destruction threatens species around the world but if Malagasy (and other) people can derive an income from sustainably utilising their natural resources by collecting and supplying golden mantellas (and other species) for the pet trade, the habitat can be left intact. If no income can be derived from habitat in this way, it will be destroyed and converted into other cash-generating uses, such as palm oil, timber etc.

The World Bank also supports sustainable utilisation and encourages projects such as this one on poison arrow frog ranching in Central America.
It is claimed that for every wild animal captured and sold as a pet an ‘estimated’ 50 animals ‘may’ be killed or die in transit. Once again an emotive argument is used and indefinite terms used when it would be more appropriate to look for facts, not indulge in speculation. A trade with such levels of mortality would simply be unviable and claims made are inevitably unsubstantiated.

In the UK Heathrow is the major hub for the international trade in animals of all types, wild caught, captive-bred, dogs and cats, fish and reptiles etc., and has recently featured in the Animal Airport TV series which focuses on the Animal Reception Centre. In 2003 the ARC carried out a study on the mortality of animals in transit whereby every shipment of reptiles entering or transhipping via Heathrow was inspected and mortality recorded. Of the 501,310 reptiles that moved through the airport, the morality rate was found to be just 0.47%, data which is reinforced by a number of mortality reports from CITES.

As reported by the Secretariat at CoP12, an analysis of the information that was collected through mortality reporting forms between 1999 and 2001 indicated that for animals of selected CITES-listed species that are shipped by air, overall transport-related mortality is low to very low. Other studies on this topic have showed similar results, suggesting that dead-on-arrival rates for animals transported by air are generally low, with the exception of a few isolated and occasionally high profile cases.

The Animals’ Committee concurred with the conclusions of the Secretariat that rather than undertaking further analysis of mortality data, the focus after CoP12 should be on other aspects of Resolution Conf. 10.21. The Secretariat notes that very few Parties continued to submit mortality reporting forms with their annual reports after CoP12.
The reptile trade is not perfect and when mistakes are made all best efforts must be made to rectify matters. Mass importation of baby slider and cotter turtles is still an area of concern which I will revisit later, but generally as an industry we work to address issues, probably more so than any other part of the pet trade.

A good example is that of the green iguana. They can make very good pets for the right keeper but the problem is when they are small they look very cute and appealing, but when they grow up they are not so cute. They were a staple part of a much smaller pet reptile industry back in 1995, but also became a huge problem in terms of re-homing as people bought them and had no conception of what they were taking on. The reptile trade worked hard to educate prospective keepers and the industry and today green iguanas are considered a specialist animal which is traded in very small numbers which is much more appropriate. Successes such as this have not been achieved by imposing bans but by the reptile industry working together under the auspices of REPTA and imposing effective self regulation.
Invasive species are currently one of the hottest topics under debate and are a serious issue and introduction of alien species is (aside from domestic cats) is now viewed as extremely bad practice. The scientific understanding of the impact of invasives has risen exponentially over the last 20 years. What was scientifically, politically and publicly acceptable only a couple of decades ago is now seen to have to have caused problems that were not foreseen nor intended. As a responsible industry we are playing our part in being part of the solution and raising public awareness of the issue e.g. by warnings on care sheets and live food containers. We are not hiding from the issues but are busy doing practical things to address it rather than just talk about it.

The exotic pet and aquatic industries must take some responsibility, but the UK government is also not without culpability as historically legislation was drafted without consultation with stakeholders. In the 1970’s, for example, it was common practice for garden centres to sell newts for garden ponds and when the great-crested newt became protected trade switched to imported Italian crested newts. These were imported by their thousands and sold by garden centres for release into garden ponds, which at the time this was perfectly legal.

Both OATA and REPTA take the issue of introduced alien species extremely seriously and have recently published a joint code of practice for responsible keepers of exotic animals and fish, with the key message “Don't release pets, it’s cruel".
How many reptiles are kept in the UK today? PFMA (Pet Food Manufacturers Association) data for 2013 suggests 1.4 million reptiles and amphibians are kept.

- REPTA (Reptile & Exotic Pet Trade Association) estimate the population to exceed 8 million.

- Why the disparity..?

How many reptiles are kept in the UK today? PFMA (Pet Food Manufacturers Association) data for 2013 suggests 1.4 million reptiles and amphibians are kept in the UK, whilst REPTA (Reptile & Exotic Pet Trade Association) estimate the population to exceed 8 million, which is something of a disparity. The PFMA data is gathered from 2,000 interviews with adults over 16, whilst REPTA data is compiled by analysing sales of food for reptiles.
With the exception of foods for herbivores (tortoises for example) the overwhelming majority of foods for reptiles and amphibians are specifically produced for them. Each week in the UK 25,000,000 crickets, 10,000,000 locusts and 2 tons of mealworms are sold, along with an array of other bugs. In addition, there is a growing market for artificial diets and frozen foods, predominately rats and mice. The reason I have not included numbers of frozen rodents is due to the complexity of supply as many distributors supply both the bird of prey and reptile market, whilst insects are sold through more defined channels.

Sale of livefoods is a good methodology for baseline data on the state of the reptile industry, as it is one of the easiest components to measure, the more livefoods are sold, the more the market is expanding. In 2004 10,000,000 crickets a week were used in the UK, rising to 20,000,000 by 2008. By 2013 this had only risen to 25,000,000 although the volume of locusts produced had more than quadrupled and today these are the highest value food item in the industry, having outstripped crickets.

The unexpected curved ball in the livefood trade is the humble mealworm, which had fallen from favour in the reptile food market. In recent years they have had something of a resurgence, becoming the staple diet for leopard geckos which favour foods with a heavy chitinous exoskeleton.
Growth of the reptile industry over nearly ten years has been plotted by compiling data from analysis of products sold by specialist wholesalers etc. The value of the reptile market in 2013 reached two hundred and fifty million pounds, which does not include sales of live animals.
Rolf C Hagen Inc is a Canadian company and one of the largest of the general pet product manufactures in the world, catering for everything from cats and dogs to birds and fish. In 2004 they launched the Exo Terra brand for the reptile market, distributed in the UK by the wholly-owned subsidiary, Rolf C Hagen Ltd, who have kindly provided their sales data (at retail value) for the UK.

This data shows a sharp rise in sales of reptile products which started to slow down in 2010/2011, which is very much mirrored by the last data set. Whether this is an indication of the economic downturn, or if the market has reached maturation remains to be seen.
In 2013 REPTA looked at other indicators which could be used to estimate numbers kept and an obvious choice was sales of enclosures as if you are going to keep an animal it will need to be kept in something, i.e. a terrarium or vivarium.

These figures will be a substantial underestimate as many people make their own enclosures or adapt other equipment, such as aquaria, but nonetheless do give an indication as to the size of the market. Thirteen manufacturers of branded terrariums/vivariums participated in the survey, which showed sales totalling 134,038 enclosures, equating to 2,577 enclosures per week sold through pet shops in 2012.
Today the trade in sale of reptiles from pet shops largely hinges on a handful of species: leopard geckos, bearded dragons, crested geckos, corn snakes (colubrids), royal (ball) pythons and Mediterranean tortoises, which account for 70% of animal sold.

With perhaps the exception of the humble garden tortoise (which does everything at a subdued pace) one could argue persuasively these are all "domesticated" species inline with their mammalian counterparts, hamsters, gerbils & guinea pigs. Many of which have, incidentally, been kept in captivity for shorter time period than reptiles.
Twenty years ago the number of species commonly in trade at the average pet shop was vastly greater than it is today but, whilst the species in trade from pet shops is today largely limited to a key number of pet species, the number of species kept and breed by specialist keepers is large and diverse. The trend from the Animal Rights industry today is to push for what is called either a White List or Positive List of species that can be kept. Superficially this may sound entirely reasonable, but look in more detail and it soon becomes apparent that this far from the case.

Project ARK is currently compiling a database of all species of reptiles and amphibians that have been legally traded in the EU. The starting point for this project was to contact key traders in the EU and ask them to provide data on the species they have imported or traded over the past ten years. The response to this request has been overwhelming, producing a mammoth response and the data is currently still being processed, although it would appear that some 3,500+ species and subspecies have been legally traded over the past ten years. Phase two is to collate data on breeding and to establish when a species were bred for the first time and if this was achieved by hobbyists or zoological institutions.
The sale of animals as pets is regulated under the Pet Animals Act, 1951 and is underpinned by Model Standards for Pet Shop Licensing, which have recently been reviewed and extensively modified. Broadly speaking, the legislation is fit for purpose but ultimately requires new legislation as promised under the Pet Animals Act. Unfortunately, however, the secondary legislation in terms of pet vending appears not to be forthcoming.

There is a swathe of issues that could be resolved by secondary legislation, including regulation of pet fairs, commercial breeders, sanctuaries and rehoming businesses, the latter of which are increasingly presenting serious issues that need addressing. It is, for example, quite clear that organisations which re-home animals for a fixed fee should be licensed under the Pet Animals Act as such transactions are sales in law and, thus, fall under the remit of the Act.

The other issue in terms of pet vending is the internet which touches into every corner of modern life, including sales of livestock. In order to address the issue, in September 2013 the Pet Advertising Advisory Group (PAAG), of which REPTA is a member, launched the Minimum Standards for UK websites (internet advertising) with Defra backing.
Just how many pet shops exist and how many sell animals is something of an unknown quantity. REPTA is part of a collaboration of trade associations (ProPets), which was formed in 2007 as an informal group which would work together to promote the responsible pet trade.

Its first survey of pet shops and pet shop licensing was carried out in 2010 and it was decided to revisit the issue this year with a FOI request to all Local Authorities to establish how many pet shops were licensed to sell animals, and what they were licensed for.

Unfortunately the work of ProPets has been slightly damaged by internal politics, including resignation of one of the signatories, and Keith Davenport of OATA, the chief architect of the group, has undertaken to carry out the survey and the data shown is the result of this work. This is currently interim data and the final report will be published soon.
How many reptiles were sold in 2012 is a figure we simply do not have, but we also do not have data for any pets, even dogs & cats or any pets/companion animals.

What I have tried to do is collate all the data available and present it in table form. There does appear to be some disparity between data from Eurostats and other data that REPTA has collected, some of which arises as Eurostats runs from January to December, whilst other sources of information, such as the AQS station at Heathrow, run from April to March. I am not entirely convinced this accounts for all the disparity, although intercommunity trade is very difficult to define as movements of reptiles are not required to be logged on TRACES.

In broad terms, we estimate some 500,000 reptiles and amphibians were sold in the UK in 2012, approximately one third of which were imported with two thirds bred here. Of all reptiles sold less than 10% were of wild origin.
All pets can potentially carry pathogens which can affect humans or other species and it is true that salmonella is a common gut flora of reptiles, but not all salmonellas are zoonotic and good hygiene practice reduces risk to negligible levels. If we are truly concerned about the danger posed to human health by pets then let’s debate the real threat posed by cats and dogs. I am sure we are all aware of the massive rise in attacks and deaths caused by dogs in recent years and in 2012 alone 6,450 people were admitted to hospital from dog attacks, of which a number were fatal.

Perhaps we are not so aware of the significant rise in diseases caught from cats, with an estimated 350,000 people a year in the UK becoming infected with toxoplasmosis alone. There has also been a massive rise in cat scratch disease, which can have catastrophic long-term affects and can also be fatal.

The table from NHS Health Statistic for England helps bring some perspective to the debate. According to NHS data about 100 people are bitten a year by our indigenous venomous snake, and it is, therefore, highly likely that the overwhelming majority of incident reports were adders not exotic species. For this reason I did not include the statistic X20 (contact with venomous snake) with other reptile data (W58 and W55) in order to separate pet reptile data from adder-related incidents.
Re-homing of animals is an essential part of animal keeping, which can broadly be categorised into two sectors:

Animals re-homed for legitimate reasons, for example the death or failing health of the keeper or what I would call illegitimate reasons, i.e. the cat did not match the colour of my sofa. Unfortunately we do not collect such data, nor do we collate any data on the numbers of animals re-homed each year.

I take a very simple and pragmatic view on the issue of re-homing, which is that the pet industry is part of the problem (we supply some of the animals that will ultimately need to be re-homed), so we should be part of the solution. Unfortunately this is easier said than done as many of those involved in re-homing refuse to work with the industry.

Establishing statistics is the starting point in understanding the scale of the problem in terms of reptiles. As always, the SSPCA are extremely accommodating and are happy to supply data, but unfortunately the RSPCA are less helpful and inevitably decline to supply information. The only data I ever received from them was back in 2008, or what can be taken from their publications.
If we are serious about improving animal welfare we need to be able to collect data to allow us to analyse whether things are improving or declining, which leaves us with a fundamental dilemma. In the UK animal welfare is largely deferred to the charitable +sector which relies upon donations from the public.

If data is collected which shows an improvement in welfare and decline in cases of cruelty or neglect, the potential consequence could be a decline in donations. There, therefore, exists a clear conflict of interest in assessing animal welfare in the UK which is difficult to address.

Another problem is that only bad news sells and raises money for good causes, leading to an aversion to publicising positive steps and establishing proper data, without which we will never get a true picture of animal welfare issues. These are clearly areas which need to be looked at further but which are fraught with difficulty.

**Responsible ownership**

- We need to be able to measure ownership of reptiles and other companion animals. On an annual basis we need to know:
  
  1) How many animals are kept & of what taxa?
  2) How many are rescued or rehomed?
  3) How many prosecutions for welfare offences?
  4) How many injuries/deaths to humans?
  5) How many injuries/deaths to other animals?
First and foremost, I would like to see the introduction of licensing commercial importers of reptiles and amphibians. Importation of live reptiles and amphibians for commercial purposes is currently unregulated (except for CITES), in terms of facilities, competency, bio-security etc. At present anyone can import reptiles and amphibians for commercial purposes without regard to regulations or knowledge of the welfare requirements of the animals concerned. The introduction of such legislation, however, is an EU competency; the UK cannot implement such legislation.

The Pet Animals Act has served well but needs replacing by new Pet Vending legislation to address the modern world. I would like to a tiered system for licensing shops, driven by examination rather than qualifications. The first stage would be a ‘general pet shop licence’, much as we have today, which would permit trade in common ‘pet’ species. This could be augmented by further examination to permit trade in other species. Segregating general pet shops from specialist shops would be highly desirable and beneficial. The issue of internet trade should also be addressed, although I concede this is going to be a challenge, and at the very least the introduction of compulsory Minimum Standards would be desirable.

Formal regulation for both Pet Fairs and Re-homing would also be a huge benefit and both could fit into the above Pet Vending legislation. If government is not minded to introduce further legislation, then at the very least some form of registration would be advantageous.

Most important of all, effective licensing and enforcement is crucial and the only way to do this is to strip responsibility from Local Authorities. Animal Welfare is not (and is highly unlikely to ever be) a high priority for Local Authorities and with such a broad remit from education, housing to other human welfare issues this is neither unsurprising nor unreasonable. Stripping the responsibility for inspections and enforcement to a central body would ensure consistence and competency, with issuance of licences remaining a function of the authority.
Conclusions

1. REPTA & OATA are effective political lobbying groups
2. The trade organisations are targeting problems, such as introduced alien species
3. Positive lists have failed in EU member states
4. Government favours self regulation, not increased legislation
5. Policy statements must be evidence-based

Conclusions

Both the reptile trade and ornamental aquatic trade have proactive associations (REPTA & OATA) which are actively involved with formulating government policy, including the Animal Welfare Act. REPTA & OATA are already responding to many of the perceived problem areas, such as introduced alien species.

Positive lists have proved a dismal failure in all EU member states which have adopted them and attempts to introduce such controls in the UK would have huge levels of non-compliance as well as imposing levels of policing and bureaucratic process which the government simply could not adopt.

Those involved in the reptile (and ornamental fish) trades would have severe difficulties supporting any organisation supporting policies which have been drawn up without prior stakeholder consultation and with a preconceived agenda.

Introducing draconian controls, such as positive lists, would have a severe negative impact on animal welfare as, for example, owners of “banned” animals would not be able to seek veterinary assistance.

Reducing choice of pet through imposed controls would increase problems of re-homing and abandonment as prospective keepers would be more likely to choose a less suitable pet.

Government favours self regulation which both REPTA and OATA have demonstrated can be hugely effective.

All investigations and resultant policy statements should be evidence-based, not driven by prejudice, undue outside influence or financial considerations.
I would just like to take this opportunity to thanks to my dutiful assistants Alexander & Sergei whose contribution was invaluable.

I would also like to take the opportunity to point out to anyone who receives emails from me that the atrocious spelling is not necessarily down to dyslexia, it is also attributable to these little buggers keep pulling all the keys off my key board..!!

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