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16/07/2018

Dear

I am writing to you as a veterinary surgeon working in 100% exotic animal practice in Wiltshire. My letter concerns the new Animal Activities Regulations, soon to become law in England in October of this year. I lead a veterinary working group of several exotic animal veterinary professionals (veterinary surgeons and registered veterinary nurses). Our group aims to advise the Federation of British Herpetologists (FBH) from a veterinary perspective, on matters concerning reptile and amphibian welfare, husbandry, health/disease and relevant legislation. Our group has been provided with a copy of the draft guidance notes for conditions for selling animals as pets, dated June 2018. As a group of professionals involved both in advising the public on matters concerning exotic animal husbandry and carrying out inspections of animal establishments, including pet shops that sell reptiles and amphibians, we have identified several issues with Part K of the guidance notes, which we feel are impractical, inadvisable or unrealistic to have in such a document.

We welcome the review of animal establishment licensing and feel there are many positive elements to the new regulations. For example, having guidance on the minimum standards for husbandry for specific taxa such as reptiles and amphibians is an improvement on the current regulations. We also welcome that inspectors must now be suitably qualified to a minimum level. It is our hope that the issues identified below might be taken into consideration when it comes to producing the next draft of the guidance notes, in advance of them becoming law.

The issues that we have identified with the guidance notes are as follows:

1. Given that there are 6000 different species of lizard, 3500 different species of snake, 4500 different species of frog etc, from a diverse range of different habitats and ecosystems across the planet, we feel it is inappropriate to have such simplified/"one size fits all" guidelines for temperature and humidity requirements for entire taxonomic orders/suborders, as is given in page 68 of the guidance notes. Although the guidance makes it clear that the ranges for temperature and humidity are guidelines only, we feel by having such simplified guidelines, there may be less of an inclination for license holders to research the specific temperature and humidity requirements for a species – particularly in establishments where lots of different species are kept and where there is a rapid turnover of stock, as it will be easier to follow the rough ranges published in the guidance as a blanket policy. This could have significant negative consequences for animal welfare. Our recommendation would be that the guidance makes it necessary for license holders to research and provide the correct ambient and basking temperatures for the species concerned, with an appropriate thermal gradient – without providing such specific guidelines, as the temperature/humidity guidelines given are unsuitable for a very large number of reptile/amphibian species.
2. With regards to the provision of hides and sheltered areas, we feel it is essential as a minimum standard that hides/sheltered areas must be present in different areas across the thermal gradient. At present, this is only a requirement for the higher standards, as given on page 69. While in most cases a minimum of two hides is necessary for this – in some circumstances, for example where a large hollow log, or piece of corrugated iron etc. is provided spanning much of enclosure/thermal gradient (with multiple hiding spaces within it) – it may be possible to meet the requirement technically with a single hide only.
3. We feel that water quality measurement such as is recommended for fish is essential for all significantly aquatic amphibians. At present, page 69 of the guidance suggests that this is a requirement only for aquatic/semi aquatic frogs (and not other amphibians).
4. Page 72 of the guidance notes suggests that faeces/urates should be removed once daily. While in most situations this applies, in certain setups, particularly some bioactive or large naturalistic setups containing small species, this is impractical/unnecessary.
5. Concerning the given minimum water depths for amphibians and tortoises/terrapins, the current guidelines are inappropriate for many species. There are many amphibian species which need/prefer shallower water. The same is true for terrapins, particularly juveniles and some species which are less buoyant and prefer to live in shallow waters. Currently, the table suggests the need for these water depths for "tortoises and terrapins". Terrestrial tortoises do not have the same requirements for water depth as do terrapins and turtles.
6. There is no mention of the need to provide a moisture gradient as is recommended for many amphibians. In setups which are misted on a regular basis to keep humidity levels elevated, it is important that a drainage layer is provided in the enclosure to avoid the substrate from becoming waterlogged. Drainage must be considered in all setups where there is a risk of waterlogging.

7. The recommendation that tap water for amphibians may be dechlorinated if left to stand for 24h is hazardous as this does not facilitate the removal of chloramines. For this, water must be treated.
8. Perhaps the most problematic area of all are the minimum and higher standards for enclosure sizes:
  - As far as amphibians are concerned, many tadpoles/juvenile amphibians are typically reared individually, especially those species which may be cannibalistic. Often tadpoles are reared/grown in small containers/pots and there is no evidence that this compromises their welfare. It would be entirely unrealistic for many juvenile/larval amphibians to be housed in enclosures which are 30x30x30cm, but the current guidance makes no provision for this.
  - Although the guidelines for enclosure size for tortoises and terrapins may be acceptable for some juveniles, for the clear majority of adult tortoises and terrapins, the current given requirements are far too small. Given the variable nature of privately kept chelonia species, from small musk turtles, to large Aldabran tortoises, it would seem unrealistic to provide a hard and fast rule for enclosure size. On the other hand, by stating that 4 x PL is acceptable, this potentially gives legal justification for animals to be kept in enclosures which are too small. The guidelines should state that chelonia should be kept in enclosures which allow sufficient activity, normal behaviour patterns and thermoregulation. In the absence of an applicable “hard and fast rule” for enclosure sizes for chelonia, it would be better not to recommend a numerical minimum for enclosure size, than to provide one which will be far too small for many individuals.
  - The guidelines for enclosure sizes for snakes are especially problematic as they currently stand. It is our belief that the minimum enclosure sizes (2/3 length STL x 1/3 length STL) are suitable as a minimum, even for the “end consumer”, in a household situation. The higher standard, which requires enclosures to be 1 x the length of the snake is in excess of what is required for good welfare. For example, it is perfectly reasonable for a four and a half or five-foot corn snake to be housed in a four-foot vivarium. Equally, it is perfectly reasonable for a six or seven-foot carpet python to be housed in a 4x2x2 vivarium. There is much herpetocultural literature and veterinary literature to support this. We would support that the “minimum” enclosure sizes for snakes should be valid long term, not only for the initial 3 months. For some specimens, especially juveniles, there is evidence that smaller enclosures, offering greater security are preferable. This is also the case for certain species, for example the royal python – with many individuals of this species thriving in more confined/secure spaces. If a hard and fast rule for enclosure sizes for snakes is to be provided, then our feeling is that the present minimum sizes should be valid in perpetuum.

I would like to take the opportunity to thank you in advance for reading this letter and considering the issues that we have raised. It would be great to hear back from you with your views on these issues. Our group is happy to give further input into the construct of the

proceeding draft if required and to give opinions on any matters that subsequently arise. This piece of legislation is of considerable importance to both animal welfare and to the hobby/trade/industry of herpetoculture in the UK. We feel that it is of great importance that the document be sufficiently scrutinised, prior to it becoming law.

Yours Sincerely

Working group members in support of this letter:

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