

RESPONSE FROM THE GOVERNING COUNCIL OF THE CAT FANCY TO THE DEFRA CONSULTATION DOCUMENT ON THE IMPLEMENTATION OF EU REGULATION 1/2005 ON THE WELFARE OF ANIMALS DURING TRANSPORT

BACKGROUND INFORMATION

People who breed or show pedigree cats regard these as expensive hobbies which enhance their enjoyment of cat ownership.

Regulation of Breeding and Showing

The vast majority of pedigree cats bred in the UK are registered with one or more of the recognised bona fide registering organisations, of which the Governing Council of the Cat Fancy (GCCF) is the oldest and largest. It was formed in 1910, registers over 30,000 cats per year and is purely UK based. The other two organisations with jurisdiction over their members in the UK are the Fédération Internationale Féline (FIFe) and The International Cat Association (TICA), both of which have worldwide membership. By registering a cat with an organisation, the owner is agreeing to abide by the rules and regulations of that organisation, all of which are aimed at maintaining the welfare of the cats and the integrity of cat breeding and exhibiting.

When anyone registers a cat with the GCCF, transfers a cat on the register into their ownership or enters a cat into a GCCF licensed show, the form they sign includes a declaration that they will abide by the Rules and Constitution of the GCCF. Any breaches of these, which specifically include "Any act, conduct, default or omission arising out of, connected with or relating to the keeping, breeding, exhibiting or judging of cats which may be discreditable or prejudicial to the welfare of cats...", may result in disciplinary action via the GCCF's Investigation and Disciplinary Committees. People found guilty of prejudicing the welfare of cats may be fined and/or suspended from all Cat Fancy activities.

GCCF, FIFe and TICA are all members of the World Cat Congress and share information about members who are suspended, so that such people cannot simply transfer their activities to an alternative organisation.

Breeding Cats

Cat breeders do so for various reasons - to try to achieve improvement in a particular breed, to introduce new colours and patterns into a breed or simply because they like to have a litter of kittens from time to time. Traditionally, when a queen calls and is ready for mating she is taken to a stud, remains there for a few days to ensure that several matings have taken place, preferably over more than one day, then is collected by her owner. Many cat breeders do not keep their own studs and indeed this is not encouraged until they have some experience. Since, for the welfare of cat breeds, it is necessary not to inbreed too closely, the journey to stud is often more than 65km. Since a queen may go 'off call' after the journey to stud, particularly if stressed on the journey, breeders are very careful to subject them to as little stress as possible.

The GCCF has a Code of Ethics which breeders are expected to comply with. Among other things, this strongly recommends that no kittens are sold until they are at least 13 weeks old, having completed vaccinations against Feline Panleucopaenia, Feline Calicivirus and Feline Herpesvirus together with a health check. Many breeders also vaccinate their kittens against Feline Leukemia Virus and/or Feline Chlamydiosis. Some also have their kittens microchipped before sale or even have them 'early neutered'.

Although many new owners collect their kittens from the breeder, some breeders wish to visit the new home, to ensure its suitability, before parting with the kittens; often the new owner will visit the breeder to select the kitten(s) but the breeder will then deliver them to the new owner when they are ready for sale. If the new owner is disabled or has no transport, a breeder will often deliver the kittens since this is obviously preferable to their travelling by public transport or courier. Many owners prefer to sell two kittens together, especially if the new owner is out at work for part of the day, since it is in the kittens' welfare interests to have company.

The Code of Ethics requires that a breeder should offer to help with rehoming any kittens they sell, should this prove necessary. This may mean taking kittens back if they fail to settle in their new home, or may entail rehoming at any stage during their lives, due to changed circumstances. The breeder is sometimes expected to collect the cats in order to prevent their delivery to a local cat rescue.

Breeders are careful to ensure that their cats and kittens are transported safely in secure and comfortable cat carriers. This is usually in a private car, in the same conditions as they, their family and children would travel.

Showing Cats

Cats are shown regularly, up and down the country, although the GCCF does not permit cats from any one household to be shown more frequently than once a fortnight. The GCCF rules state that cats "must arrive at the show hall in a suitable container (top-opening recommended)". Before entering the show hall itself, all cats are inspected and any which display signs of disease or stress will be rejected by the duty veterinary surgeon and not permitted to compete.

For this reason it is obviously counterproductive not to ensure that the cats travel safely and in comfort, with every attempt made to minimise stress. Shows would very often be more than a 65km journey, especially if a breeder is supporting a specialist show for their breed. Owners often travel together to shows in order to share transport costs. Again, these journeys are usually in private cars, although some owners do travel by train and in the case of large shows, such as the Supreme Cat Show (the GCCF's equivalent of Crufts) cat clubs may organise coaches for long distance travel.

Cats are not sold at shows - the GCCF strongly advises against this practise since it could be interpreted as detrimental to the cats' welfare. Shows are an opportunity for exhibitors' cats to be compared against each other, gaining awards with no monetary value, but giving great pleasure to the participants.

Veterinary Care

Cat owners and breeders are encouraged to have regular veterinary care and attention for their cats. As stated earlier, breeders are expected to have their kittens vaccinated before parting with them. All cats shown at GCCF shows must have up to date vaccinations/boosters for Feline Panleucopaenia, Feline Calicivirus and Feline Herpesvirus, completed at least one week before the show in order to ensure that not only are they protected, but that they are not under the stress of a recent vaccination.

In addition, breeders and owners who come under the jurisdiction of the GCCF are expected to seek prompt veterinary attention at any time that it is necessary. Indeed, failure to do so could be regarded as compromising the welfare of cats and could therefore result in disciplinary action.

There is an increasing tendency to have apparently healthy cats tested for various genetic conditions. Cats are often tested for Polycystic Kidney Disease, Hypertrophic Cardiomyopathy, deafness etc. Such testing is strongly encouraged by the GCCF since it is in the interests of all concerned to attempt to produce kittens which will not develop these conditions at a later date. For some breeds, such testing is required before kittens may be registered.

SUBMISSION

The Governing Council of the Cat Fancy submits that cat owners, breeders and exhibitors who register their cats with a recognised bona fide organisation with jurisdiction in the UK and/or who show their cats at shows licensed by such an organisation should be excluded (derogated) from the requirements of EU Regulation 1/2005 on the Welfare of Animals During Transport.

ARGUMENT

The consultation document is unclear on many points since the wording allows different interpretations. It could be interpreted in ways which would severely impair the welfare of cats.

Mating queens and the keeping of studs

If it were to be interpreted that taking a queen to stud required authorisation this could have serious effects. It would not affect many experienced breeders who keep their own studs, but would encourage the less experienced breeders either to keep their own studs or to use studs very near to them.

Studs usually require their own accommodation since they have a tendency to spray urine and it is also not desirable for them to mate any calling queen at any time. Many breeders do not have the facilities to provide adequate accommodation for studs so any attempt to keep one would compromise the welfare of that stud. In addition, the use of a local stud would often not be in the best interests of the future welfare of the breed in question.

Even if a journey with a single cat is excluded, it is not uncommon for queens to call simultaneously, so a breeder may wish to take two queens to a stud owner who has two studs, or to take two queens to different studs in a similar area.

Kittens

Breeders often like to sell kittens in pairs, for their future welfare. If they combine the inspection of the future premises with the delivery of the kittens this would appear to require authorisation. However, the collection of the kittens by the new owner would appear not to require any authorisation. This is anomalous: the vehicles and the kittens' containers might be identical and, since the breeders are usually the more experienced cat owners, they are more likely to detect any stress which might be caused by the journey.

Showing Cats

Exhibitors frequently take more than one cat to a show, especially if they are supporting a specialist show for their breed. If it is interpreted that the showing of entire cats requires authorisation but that the showing of neuters does not, this is an anomaly since both require equal care on a journey. Many cats are kept entire for a while and shown as such before being neutered, with no intention to breed from them.

If the transport of cats to shows is interpreted as requiring the provision of equal numbers of humans and cats in the vehicle, there would no longer be room in many private cars for both cats and humans to travel safely. This could result in more vehicles on the road with no improvement in the welfare of those cats in transit. Even if journeys to a show are adjusted to comply with such a regulation, there could be occasions where a journey home could be in breach of them: an exhibitor might be taken ill and be unable to drive home, in which case another owner might need to transport additional cats on their return journey.

Veterinary attention

Although the document excludes journeys to a veterinary surgeon under veterinary advice it does not define this. Journeys may be made to veterinary surgeons or other specialists for many reasons other than illness or accident. Cats and kittens require vaccination and cats are frequently tested for Feline Leukaemia and Feline Immunodeficiency Virus in addition to the tests for hereditary diseases..

Some of these more specialised tests are only conducted at certain places in the country and owners often take several cats to have these tests conducted.

Some veterinary surgeons do not operate an appointment system so contact with the practice may not have been made before the journey. In some areas of the country the preferred veterinary practice may be more than 65km away, especially outside regular hours.

It is imperative that any journey to a veterinary surgeon or other specialist, undertaken in the interests of the welfare, immediate or future, of the cat or of the breed, is excluded from the requirement of any authorisation or regulation. It would be detrimental to welfare if any person had to consider whether or not authorisation or regulation was required for such a journey.

Transport

The vast majority of cats are transported in cat carriers, designed for the purpose, within private vehicles. In addition, some cats are transported to shows by their owners on public transport or in privately hired coaches; in these latter cases the owners obviously do not transport more cats than they can carry with ease.

Private cars are considered adequate for the comfort of passengers, including small babies, and cat owners ensure the comfort and welfare of their cats on journeys - this often exceeding the comfort of adult human passengers.

It would appear that the regulations would require the authorisation of a particular vehicle. The vehicle to be used for transport, for example, to a show may not be known much in advance of that show: the owner may own more than one car or two owners may travel together, the decision on the vehicle to be used depending on weather conditions or other factors.

It would be detrimental to the welfare of cats if any regulations encouraged the use of couriers rather than the transport of cats, by their owners, in their own or other private vehicles. The owner is best placed to understand the conditions which are most suitable for the comfort and welfare of any individual cat. In addition, the use of couriers could result in cats from different households, unknown to each other, to be placed in close proximity in a confined space which could encourage the spread of airborne disease.

Policing of the welfare of cats in transit

The rules and regulations of the bona fide cat registering bodies in the UK include many concerning the care and welfare of cats kept as pets, used for breeding or shown. Anyone registering or showing with such an organisation comes under its jurisdiction and is subject to its disciplinary powers, which include the possibility not only of fining anyone in breach of rules, but of depriving them of the enjoyment of their hobby by suspending them from that activity.

The GCCF takes these obligations very seriously, as do the breeders and exhibitors concerned. They are applied equally throughout the UK, which might not be the case if regulation of transport devolved to local policing. The application of these disciplinary powers requires no public financial or clerical support, which again might not be the case if the transport of such cats were to be included in the EU Regulation.

CONCLUSION

The Governing Council of the Cat Fancy therefore submits that, in the interests of all concerned especially the welfare of the cats themselves, cat owners, breeders and exhibitors who register their cats with a recognised bona fide organisation with jurisdiction in the UK and/or who show their cats at shows licensed by such an organisation should be excluded (derogated) from the requirements of EU Regulation 1/2005 on the Welfare of Animals During Transport.

Enclosures

GCCF Constitution
GCCF Rules
GCCF Code of Ethics

further information about the GCCF available from
GCCF Office
5 King's Castle Business Park
The Drove
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tel: 01278 427575
email: jackie@gccfcats.org
website: www.gccfcats.org

RESPONSE TO CONSULTATION QUESTIONS

SECTION 2

Q 1. Many statements in the consultation document are unclear. see response

Q 2. The Governing Council of the Cat Fancy submits that cat owners, breeders and exhibitors who register their cats with a recognised bona fide organisation with jurisdiction in the UK and/or who show their cats at shows licensed by such an organisation should be excluded (derogated) from the requirements of EU Regulation 1/2005 on the Welfare of Animals During Transport. see response

SECTION 3

This section appears to apply mainly to the transportation of livestock, rather than cats but it is unclear when self-declaration would be required and how any checks would be implemented.

SECTION 4

If vehicle inspection would be required for the transportation of cats, this could involve the inspection of an extremely large number of private cars. It is very difficult to see how this could be implemented.

SECTION 5

This appears not to apply to cats, but to livestock which are transported mainly for eventual food production.

SECTION 6

Again, this appears to relate to livestock and not to cats.

Cats are occasionally transported between the UK and other countries for breeding or showing purposes, but the regulations which already apply to this are observed and inspections, at least of paperwork, are expected.

SECTION 7

Q 35. Cats are nearly always transported by their owners. It is difficult to see what training is required.

SECTION 8

Many regulations regarding the transport of cats are already law. e.g. they must be restrained in vehicles, actions contrary to welfare such as leaving them in hot cars are covered by other welfare law. There is no reason to amend these.

SECTION 9

see answer to Q 2. above.

SECTION 10

Any guidance contained in the consultation document is contradictory and difficult to understand. It has already caused great consternation to many people who enjoy the hobbies of cat breeding and cat showing. The GCCF already publicises its Rules and Constitution which cover the welfare of cats, both in transit and otherwise.

Partial Regulatory Impact Assessment

Section 5.27

Cat breeders and exhibitors regard themselves as enjoying a hobby rather than running a business of any kind. There would be no discernible benefit to the welfare of cats by applying these regulations to these hobbies.

Section 5.44

It is impossible to decide how many breeders or exhibitors of cats might be affected, therefore impossible to estimate costs. There would certainly be no cost benefit to them and any additional costs incurred might deter some people from indulging in their hobby.

Section 6.5

The Cat Fancy does not consider itself to be a business or industry, but a hobby.