Scotland's exotic pets

Why the internet trade in exotic pets in Scotland needs regulating





INTRODUCTION

Exotic pets are growing in popularity in Scotland, the UK and across the world. Millions of individual wild animals are imported annually into the European Union to supply the non-domesticated ("wild" or "exotic") pet trade. The diversity of species is considerable and involves, at a conservative estimate, over 1,000 species of mammals, birds, invertebrates, reptiles and amphibians, plus hundreds of fish species¹. This enormous trade brings a number of problems in its wake.

One of the key factors behind this trend is the easy availability of exotic animals online. Being able to buy any animal at the click of a button inevitably results in purchases of pets that might be inappropriate to the lifestyle and/or budget of the buyer. It also fuels other welfare issues that are common amongst exotic pets as animals are often sold in poor condition and with little or none of the information required by a buyer to make a responsible choice.

This report has been produced to support the ongoing review of pet vending legislation in Scotland and contains the results of six months of monitoring of online adverts for exotic animals in Scotland. In order to assess the extent and nature of exotic pet sales originating in Scotland, this research has followed the methodology used in the Blue Cross and Born Free Foundation report on the UK online exotic pet trade, One Click Away².

The report concludes with recommendations to improve the regulation of the online trade so that the welfare of animals sold online is properly protected.

Exotic pets are animals that have not traditionally been kept as pets and therefore have not evolved alongside humans in the same way cats and dogs have. They have the same needs and instincts as their wild counterparts. Exotic pets are also sometimes referred to as 'non-domesticated' or 'non-traditional' pets.

Scotland's exotic pet population

Reliable statistics for the numbers of pets, especially exotic pets, in Scotland are not available. On a UK basis, the Pet Food Manufacturers' Association (PFMA) publishes a survey-based Pet Population Report³ each year and estimates the number of pets owned in the UK in 2015/2016 at 57 million. The Report breaks down regional ownership to show percentages of households with certain pets, but this does not include exotics such as reptiles. On a UK basis, the Report estimates pet populations as follows:

- Indoor fish 16 million
- Outdoor fish 20 million
- Dogs 8.5 million
- Cats 7.5 million
- Rabbits 0.8 million
- Domestic fowl 0.5 million
- Guinea pigs 0.7 million
- Indoor birds 0.6 million
- Hamsters 0.4 million
- Lizards 0.3 million
- Snakes 0.3 million
- Tortoises/turtles 0.3 million

By contrast, the Reptile and Exotic Pet Trade Association (REPTA)⁴, based on its analysis of sales of food for reptiles, states that there are over 8 million reptiles kept as pets in the UK – a considerable disparity.

EXOTIC PETS - THE ISSUES

Animal welfare

The many species that are kept as exotic pets have widely varied and often complex and poorly understood needs. As a result, they are more prone to suffering when kept in captivity than domesticated animals. In this report, references to meeting animals' needs cover only those basic dietary and environmental details that can practically be met in captivity; domestic keepers cannot provide for behavioural needs such as digging networks of tunnels or roaming over a large territory.

Transport

The welfare challenges around exotic pet keeping begin before an animal even reaches its new home. Prior to sale, animals are kept by wholesalers and retailers in small units where it is frequently impossible for their natural behavioural needs to be met. For example, there have been many reports of incidents of reptiles being kept in containers that are too small to allow movement and of rabbits and guinea pigs being transported in high-density crates. Wildcaught animals frequently die before they can even be exported from their country of origin, for reasons including crushing, asphyxiation, starvation, dehydration, temperature shock, disease, injury or stress, and never make it into trade⁵.

Deprivation of social needs

Exotic pets are wild animals with specific social needs. Many reptiles, for example, are solitary and endure significant stress if kept with others of the same species. Conversely, social animals such as meerkats and chinchillas normally live in large colonies and can suffer throughout their lives by being kept alone or in inadequately small groups. Sadly, these needs are too often not understood or even ignored by buyers and sellers alike.



Specialist environmental needs

Exotic species often have very specific environmental needs, such as specific humidity, temperature, light and soil requirements, that need specialist equipment to be recreated in a domestic setting. Other factors such as the need for movement, day-night rhythm, and seasonal rhythms also need to be considered.

There are two significant barriers that can prevent these needs being met: poor understanding and cost. For some of the more commonly kept exotic species, such as Bearded Dragons, some of their physical and environmental needs are reasonably well understood by the industry and by specialist exotic vets. Here the challenge is ensuring new owners are given the information they need and act on it. Responsible pet shops will do this, but it is extremely difficult, if not impossible, to educate prospective owners who shop online, particularly when they buy from classified adverts that usually provide little information about the requirements of the animal and may even have incorrect information.

The equipment needed to create the appropriate environmental needs, such as appropriate enclosures, heat and light lamps, can be expensive to purchase and run and may need a large amount of space. This is a particularly significant problem for those who buy an animal on the internet on impulse without first ensuring they understand the environmental needs of their pet and the financial and other implications it will have for their household.

Specialist dietary needs

Exotic animals often have very specific dietary requirements and it can be demanding and expensive to meet them. Specific needs vary according to the species, which makes proper research, particularly for the less common species, essential. It has been estimated that up to 15% of pet reptiles, for example, are malnourished.

Zoonotic diseases

Owners of conventional pets such as dogs and cats generally have a sufficient understanding of their pets' behaviour to be able to identify symptoms of disease, and are reasonably well-informed about risks such as toxocara canis or toxoplasmosis. A wider spectrum of diseases, parasites and injuries can be acquired from non-domesticated species by humans and other animals.

Examples include raccoons, which are a vector for rabies and the raccoon roundworm, which can spread

to humans and other animals. Pygmy hedgehogs, which this report shows are widely traded on the internet, can harbour major microbial infections, such as salmonella and mycobacteria, as well as some fungal and viral diseases'⁶. Reptiles can carry salmonella in their gut even without showing symptoms; DEFRA advises that keepers should presume their reptile carries salmonella and act to minimise risk of transmission accordingly⁷. Exotic birds kept as pets can transmit psittacosis, which in worst cases can lead to pneumonia and other severe complications in vulnerable individuals. There are thought to be between 25 and 50 cases each year in England and Wales alone⁸.

When exotic animals are sold as pets, information regarding the potential of zoonotic disease transmission and what the keeper should do to minimise the risk to the household and any visitors should be provided as standard⁹. However, our research shows that this rarely happens when an animal is sold on the internet. Indeed, it is hard enough to ensure this happens in pet shops. One study of pet shops in the UK found evidence to suggest that pet shop employees do not adequately understand or control the risks of zoonotic disease¹⁰.



In February 2014, BBC Scotland reported that there had been at least four cases of salmonella associated with bearded dragons in Forth Valley in the last eight months¹¹.

Impact on wild populations

Whilst many exotic pets are now captive-bred, many wild-caught animals continue to enter the international pet trade and end up as pets in UK and Scottish homes, with the EU being one of the largest importers of wildlife across the world. This trade can be particularly damaging for the welfare of the individual animal, which had been accustomed to life in the wild, and it has a detrimental impact on the conservation status of the wild population.

For example, the wildlife trade has been a significant contributory factor in the fact that nearly 30% of the 355 species of parrots are currently threatened with extinction¹². The African Grey, one of the most common pet parrots that we found to be readily available on the internet in Scotland, illustrates this. The African Grey was once widespread and abundant, but it is now classified as Vulnerable on the International Union for the Conservation of Nature (IUCN) Red List of Threatened Species, largely as a result of hunting for the global pet trade. It has already been eliminated in parts of its native range in Central and West Africa, and a survey last year of part of its former range in Ghana found only 18 birds when two decades ago 1200 were recorded¹³. Yet thousands of wild-caught African Greys continue to enter the international pet trade every year¹⁴.

The trade in turtles has been similarly damaging, particularly in Asia where their rapid decline, dubbed 'the Asian turtle crisis' by some conservationists, has been driven by over-exploitation for the pet trade, together with habitat degradation and loss¹⁵.

As a final example, the turquoise dwarf gecko, sold by the trade as the 'electric blue gecko', illustrates how global demand for pets can cause rapid population crashes. In 2011 a study of this species, which is endemic to forests in Tanzania, found that at least 15% of the potential population were collected for the pet trade¹⁶, making it a major threat alongside habitat degradation and threatening the species with extinction. In February 2015, UK Border Force officers found 165 turquoise dwarf geckos being imported at Heathrow in a consignment of animals which also included chameleons, scorpions and frogs¹⁷.

The problem is particularly acute for newly identified species that lack the protection of species already known to be at risk from collectors. In response to this, the journal *Zootaxa*, where new species are described, recently stopped publishing the location of newly identified species. The journal said that "Due to the popularity of this genus as novelty pets, and recurring cases of scientific descriptions driving herpetofauna

to near-extinction by commercial collectors, we do not disclose the collecting localities of these restricted-range species in this publication."¹⁸

Whilst the growth in captive-breeding apparently offers relief to wildlife populations, there is significant concern that some animals claimed to be captive-bred are in fact taken from the wild. TRAFFIC, the international wildlife trade monitoring network, notes that "a new global phenomenon of serious conservation concern has emerged: the laundering of species collected from the wild, but declared as 'bred in captivity' to evade international regulatory controls"¹⁹.

In a recent report, TRAFFIC points to the Horsfield Tortoise, which we found for sale in Scotland during our monitoring exercise. Statistics show a sudden and large increase in the number of individuals sold as captive-bred following a ban in wild-caught animals. Most of these were apparently from the Ukraine, which had no history of breeding Horsfield Tortoises; TRAFFIC suggests that this was instead fraudulent laundering of wild-caught animals. In another example, an investigation into captive breeding of Indonesian frillnecked lizards, which we also found for sale in Scotland during our research period, found that there was no capacity to breed these animals - yet over a thousand had been registered and sold as captive-bred.

Invasive species

Invasive species are already having a detrimental impact in Scotland and are widely considered to be one of the greatest threats to biodiversity worldwide and a major economic risk due to the impact they can have on land and water resources. The pet trade is a very common pathway for invasive species. Historically, for example, this is how the grey squirrel and ringnecked parakeet are thought to have entered the UK, and, more recently, the Topmouth gudgeon, which is considered one of the most potentially damaging invasive species to invade Western Europe²⁰. In total, around 80 alien terrestrial vertebrate species are known to have become established in Europe as a direct consequence of the trade in wild pets²¹.

The Wildlife and Countryside Act 1981 makes it an offence for any person to release or allow to escape into the wild any animal which is not ordinarily resident in or a frequent visitor to Great Britain²². However, this does little or nothing to deter the keeping of potentially invasive species; it is a punitive rather than preventative measure. Species that are potentially

invasive in Scotland are still routinely kept and there are regular reports of escapes.

For example, a raccoon, an invasive species occasionally available online, was reported to have escaped from its owner in Edinburgh's Queen's Park in August 2014²³. Raccoons have already colonised parts of Europe and governments are having to use resources to address this. For example, after raccoons colonised parks and gardens in Madrid a cull was ordered for public health reasons as much as anything else as they can carry rabies and parasites; raccoons are no longer permitted to be sold as pets in Spain. There are now thought to be over a million raccoons living wild in Germany, with a reported 67,700 killed in 2012²⁴.

UK policy²⁵ and the Convention on Biological Diversity, to which the UK is a signatory, place a strong emphasis on using public policy to prevent invasive species. This is because of the high costs and technical difficulties associated with combating an invasion. We would also emphasise the animal welfare costs of eradication programmes, which can be high even if best practice is adopted.

Online exotic pet sales

OneKind volunteers monitored the trade of exotic pets in Scotland on selected sites over a six-month period between 9 November 2015 and 9 May 2016. We used the methodology developed by the Blue Cross and Born Free Foundation for their report One Click Away, but limited our searches to adverts in Scotland, focusing on the main classified advertising sites used for this purpose: Gumtree, PreLoved and Pets4Homes. With a review of exotic pet vending legislation in Scotland in progress, our aim was to assess the extent and nature of sales originating in Scotland.

A total of 749 adverts were recorded amounting to at least 1,043 animals, of which 593 were reptiles, 381 birds and 69 exotic mammals. Approximately 79 species were advertised; note that this is approximate because many adverts did not specify the exact species.

RESULTS

Exotic animals for sale on classified advert websites and Facebook

Classifieds Facebook

Reptiles

Ackie Moniter	1	-	Varanus acanthurus
African Fat-tailed Gecko	-	2	Hemitheconyx caudicinctus
Agama Lizard	3	1	Agama
Alligator Lizard	-	4	Elgaria/ Gerrhonotus/ Abronia
Ball/Royal Python	78	29	Python regius
Basilisk Lizard	-	5	Basiliscus
Bearded Dragon	118	20	Pogona sp.
Boa Constrictor	26	16	Boa constrictor
Bosc Monitor	7	1	Varanus exanthematicu
Burmese Python	1	-	Python bivattatus
California Kingsnake	11	-	Lampropeltis getula californiae
Carpet Python	5	5	Morelia spilota
Chameleon	5	-	Chamaeleonidae
Chinese Water Dragon	-	1	Physignathus cocincinus
Collared Lizard	1	-	Crotaphytus collaris
Corn Snake	102	36	Pantherophis guttatus
Crested Gecko	22	7	Correlophus ciliatus
Dumeril's Boa	-	1	Acrantophis dumerili
Fat-tailed Gecko	1	-	Hemitheconyx caudicinctus
Frilled-neck Lizard	2	2	Chlamydosaurus kingii
Gargoyle Gecko	1	-	Rhacodactylus auriculatus
Garter Snake	4	-	Thamnophis sp.
Gecko	13	5	Gekkota
Hermann's Tortoise	5	4	Testudo hermanni
Hognose Snake	6	6	Heterodon nasicus
Horsfield Tortoise	19	16	Testudo horsfieldii
House Snake	2	-	Lamprophis
Iguana	10	6	Iguanidae
Indian Star Tortoise	-	1	Geochelone elegans
Jayark's Lizard	1	-	Omanosaura jayakari
Kingsnake	-	12	Lampropeltis
Leopard Gecko	15	15	Eublepharis sp
Leopard Tortoise	6	11	Stigmochelys pardalis
Long-tailed Lizard	-	1	Urosaurus graciosus
Madagascan Giant Day Gecko	9	5	Phelsuma gigas
Map Turtle	9	-	Grapternys geographica
Marginated Tortoise	-	2	Testudo marginata

Mediterranean House Gecko	-	1	Hemidactylus turcicus
Milk Snake	2	1	Lampropeltis triangulum
Mud Turtle	-	1	Kinosternon
Musk Turtle	-	2	Kinosternidae
New Caledonian Giant Gecko	-	2	Rhacodactylus leachianus
Panther Chameleon	-	8	Furcifer pardalis
Pine Snake	-	1	Pituophis melanoleucus
Pink-tongued Skink	2	-	Hemisphaeriodon gerrardii
Plated Lizard	-	3	Gerrhosauridae
Python	-	4	Python
Rainbow Boa	1	3	Epicrates cenchria
Rat Snake	2	6	Elaphe obsoleta lindheimeri
Red-footed Tortoise	-	3	Chelonoidis carbonaria
Reeves' Turtle	6	-	Mauremys reevesii
Reticulated Python	2	40	Python reticulatus
Saharan Uromastyx	1	-	Uromastyx geyri
Sand Boa	1	-	Eryx colubrinus
Skink	-	5	Scincidae
Skunk Gecko	-	1	Gekko vittatus
Snake	5	-	Squamata
Snapping Turtle	2	-	Chelydra serpentina
Spiny-tailed Monitor	-	1	Varanus acanthurus
Spur Thighed Tortoise	-	1	Testudo graeca
Taiwan Beauty Snake	2	-	Orthriophis taeniurus
Tegu	-	2	Teiidae
Terrapin	9	-	Terrapin
Texas Rat Snake	1	-	Elaphe obsoleta lindheimeri
Tokay Gecko	-	1	Gekko gecko
Tortoise	10	2	Testudinidae
Turtle	21	-	Testudines
Viper Gecko	3	-	Teratolepis fasciata
Wall Lizard	-	1	Podarcis muralis
Water Dragon	9	4	Physignathus sp
Western Snake-eyed Lizard	-	2	Ophisops occidentalis
Yellow Belly Slider Terrapin	31	-	Trachemys scripta scripta
Yemen Chameleon	-	6	Chamaeleo calyptratus

Mammals

Degu	48	-	Octodon degus
Pygmy Dormouse	2	-	Graphiurus murinus
Sugar Glider	8	1	Petaurus breviceps
Raccoon Dog	-	2	Nyctereutes procyonoides
Pygmy Hedgehog	11	2	Atelerix sp.

Amphibians

Tree Frog	-	11	Hylidae
Horned Frog	-	6	Megophryidae
Veined Tree Frog	-	3	Trachycephalus venulosus
Borneo Eared Frog	-	1	Polypedates otilophus
Poison Dart Frog	-	1	Dendrobatidae
Common Suriname Toad	-	1	Pipa pipa
Fire Salamander	-	4	Salamandra salamandra

Birds

42	2	Psittacus erithacus
1	-	Euodice cantans
1	-	Psittacula eupatria
19	5	Amazona
2	-	Bolborhynchus lineola
16	1	Lonchura striata domestica
1	-	Aves
1	-	Pionites melanocephalus
15	-	Ara ararauna
3	2	Neopsephotus bourkii
-	3	Pionites
77	5	Nymphicus hollandicus
11	-	Cacatua sulphurea
26	22	Aratinga
1	-	Psittacula derbiana
1	-	Eclectus roratus
-	1	Fringillidae
-	1	Eolophus roseicapillus
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Gallah Parrot	1	-	Eolophus roseicapilla
Gouldian Finch	1	-	Erythrura gouldiae
Kakariki	9	7	Cyanoramphus
Lineolated Parakeet	-	8	Bolborhynchus lineola
Lord Derby's Parakeet	-	1	Psittacula derbiana
Lovebird	42	8	Agapornis
Μαςαw	1	-	Arini
Meyer's Parrot	1	-	Poicephalus meyeri
Military Macaw	1	-	Ara militaris
Monk Parakeet	4	-	Myiopsitta monachus
Pacific Parrotlet	-	4	Forpus coelestis
Parakeet	20	6	-
Parrot	2	-	Psittaciformes
Parrotlet	4	2	Genera
Pionus	1	-	Pionus
Princess Parrot	-	1	Polytelis alexandrae
Quaker Parakeet	-	8	Myiopsitta monachus
Red and Green Macaw	5	-	Ara chloropterus
Red Capped Parrot	1	-	Purpureicephalus spurius
Red-billed Leiothrix	-	1	Leiothrix lutea
Red-shouldered Macaw	1	-	Diopsittaca nobilis
Regent Parrot	1	1	Polytelis anthopeplus
Rosella	4	-	Platycercus
Rose-ringed Parakeet	30	3	Psittacula krameri
Red Rumped Parrot	-	3	Psephotus haematonotus
Scaly-headed Parrot	-	1	Pionus maximiliani
Senegal Parrot	3	-	Poicephalus senegalus
Starling	-	2	Sturnidae
Superb Parrot	4	-	Polytelis swainsonii
Swift Parrot	-	1	Lathamus discolor
Zebra Finch	28	4	Taeniopygia guttata

Common welfare issues observed in online adverts

Animals advertised as 'unsexed' - Adverts for unsexed animals were frequent even though this is critical information for potential new owners. This will inevitably lead to welfare issues when, for example, more than one animal of the same sex is kept together when this is inappropriate for the species. It may also lead to breeding even if this is inappropriate or if the offspring are unwanted. Gumtree, March 2016, Edinburgh – Advert notes that sex is unknown but states "I believe is male because his little brave fighting bigger parrot [sic.]"

Gumtree, November 2015, Glenrothes - Advert offers two turtles for sale - one is identified as a Mississippi Map Turtle but the seller adds "not sure of the other one but there is a picture of her." **Species is not specified or is incorrect** - This is a surprisingly common problem online and it can lead to serious problems for the welfare of the animal and for buyers themselves. For example, we found 17 adverts during the monitoring period for animals described simply as 'turtles'. This term was used to refer to different breeds of turtle, including terrapins, as well as tortoises, all of which have very different needs.

The age is unknown - Entering a date of birth (DOB) or age in a pet advert is a requirement on classified websites that meet the standards defined by the Pet Advertising Advisory Group (PAAG) (See page 13). Yet we found many adverts where the DOB was clearly incorrect, e.g. the DOB was the date the advert posted for an animal that is clearly older than that.

Gumtree, December 2015, Lanark - Seller says that they 'do not know what age or sex' of the corn snake they are advertising.

Gumtree, January 2016, Falkirk – Two horsfield tortoises for sale 'due to work [I] don't have time to give them full attention ... bought them two weeks ago.' Many animals are sold after only short periods of ownership -Welcoming a pet into the family should involve extensive research to ensure the choice of pet is appropriate and then making a commitment to an animal, but many adverts suggest a high turnover, with owners keeping an animal for only a short amount of time, particularly for long-lived exotics like parrots and tortoises.

Reptiles are often described as 'aggressive' or 'grumpy' -Reptiles are usually solitary and do not seek affection in the same way as domesticated pets. Citing this natural behaviour as reason for sale suggests a worrying misunderstanding of the nature of reptiles and their qualities as pets. Gumtree, November 2015, Airdrie – Advert for a bosc monitor lizard describes the animal as a 'usual grumpy bosc but does calm down.' Gumtree, Alva, December 2015 - Reticulated python for sale or, the seller says, 'would consider a 'swap' for different kind of snake' **Snakes in particular are bought and sold as collection pieces** – Reducing the collection or making space for new animals was frequently cited as a reason for sale, and offers for swaps were also common, particularly for snakes. This suggests that they are viewed as collector's items rather than pets in the conventional sense.

Inadequate images – Poor quality, out of date or incomplete (for sales of more than one animal) images are common. This makes it harder for the buyer to ensure the animal they will be welcoming into their home is right for them.

Gumtree, November 2015, Kirkcaldy – A cockatiel is advertised for sale with a stock photo that had been found on the internet.

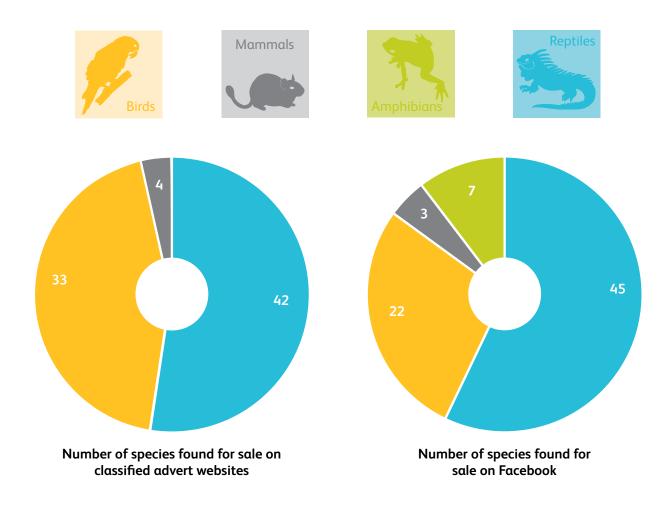
Gumtree, February 2016, Glasgow – African grey for sale in very poor condition as a result of feather plucking. **Birds are often sold with health problems and/or in inappropriate enclosures** – Birds with plucked feathers were common, suggesting stress or other welfare issues. Birds are also often sold in enclosures with no enrichment and/or alone when they should be kept in social groups.

Breeding pairs are widely advertised – This encourages potential buyers to breed and to focus on the commercial potential of the animal rather than its suitability as a family pet.

Gumtree, January 2016, Prestonpans – African grey for sale for breeding; the seller notes that 'I have had many clutches from him.'

Gumtree, February 2016, Lanark – A young Macaw is advertised as 'A very brilliant speaker talks all the time says lots of things great company perfect in every way...[sic]' **Bird behaviour is poorly represented** – Birds for sale are sometimes advertised as 'untamed', a confusing term that suggests that caged birds can be 'tamed', and adverts tend to focus on the birds' ability to do tricks and in particular to speak or sing. This may create unreasonable expectations in new owners that birds can be tamed and will perform for them rather than ensuring potential owners understand the actual needs of the animal.

A wider range of exotic mammals could be found from vendors in England and Wales – We monitored adverts placed in Scotland only but a buyer could of course access the wider UK market. During the monitoring period adverts for wider range of exotic animals could be found in the rest of the UK, including coatimundis, marmosets, palm civets, raccoons and skunk. These animals particularly when being purchased online - could easily be being transported to anywhere around the UK. Facebook, February 2016, Newcastle - A pet shop that specialises in reptiles advertises marmosets for sale.



Exotic animals for sale on Facebook

Social media, and particularly Facebook, is becoming an increasingly popular alternative to classified websites for selling pets. Many pet shops, for example, now use Facebook in particular to publicise animals they have for sale, as do smaller commercial breeders. Closed Facebook groups also appear to be expanding rapidly; these operate both as discussion forums and as a place to sell animals. For the purposes of this report we monitored open Facebook feeds only, due to the inaccessibility of closed groups. These groups must not be ignored, however – in May 2016, the advertising site Gumtree stated that it had identified over 930 such groups over a short period of time²⁶.

Over the six-month study period we monitored the Facebook feeds of three established pet shops in Scotland: Bishopbriggs Pet & Aquatic Centre, the Living Room Zoo, and ProExotics. We defined an advert as any post relating to an animal the business had for sale. A total of 447 adverts were identified over the monitoring period for animals from 77 species. The adverts included many of the issues observed in the monitoring of the classified websites, including:

- Unsexed animals For example, one advert for a Leopard Gecko said that they "don't get that much detail from the supplier" but were "usually female"
- 'Urgent' adverts For example, "last Beardie order before Christmas so don't miss out!"
- Animals pictured in inappropriate enclosures and/or with little enrichment such as bare cages

In addition, we found many posts that sensationalised the keeping of exotic pets through sharing 'cute' or 'funny' media. One shop, for example, posted images of a meerkat from their stock being given a bath. This imagery inevitably elicits a response online but it sends a misleading and potentially dangerous message that this is an appropriate way to treat a wild animal.

We also found 14 exotic pet breeders in Scotland running Facebook groups, offering a mix of posts discussing their collection and selling animals. These groups are open to anyone to join and are in addition to closed groups, which have an approval process for members and were not investigated for this report.

RECOMMENDATIONS

OneKind believes that anyone intending to acquire a pet of any kind should do thorough research beforehand and only purchase from a reputable breeder, owner or rescue shelter. The online trade inevitably makes these rules harder to follow by encouraging impulse buying and providing inadequate or inaccurate information. This results in serious welfare problems for pets, not to mention dissatisfaction and challenges for their owners. OneKind believes that the Scottish Government should take the lead in tackling this problem by taking concerted action in four priority areas.

1. Mandatory minimum standards for all classified websites selling animals

Voluntary minimum standards already exist for classified websites that allow animals to be sold or traded. They are set by the Pet Advertising Advisory Group (PAAG), have been endorsed by DEFRA and the Scottish Government and adopted by six UK websites. The standards can be found in full on the PAAG website, but they include the following requirements:

- A recent photograph of the animal that they are advertising and monitor for suspicious usage of images
- All adverts display the age of the animal advertised. No pet should be advertised for transfer to a new owner before it is weaned and no longer dependent on its parents
- Clearly labelled to show whether it is a private or commercial sale or from a rescue/rehoming centre. Commercial vendors should provide Local Authority licence information
- Ensure that species scheduled by the Dangerous Wild Animals Act are clearly marked as such and make it clear to vendors that it is an offence to offer a species covered by EU Wildlife Trade Regulations Annex A and listed by CITES for sale without a valid Article 10 Certificate
- Non-human primates should not be offered for sale
- The country of residence from which the animal is being sold

If these standards are followed they would at least increase the transparency of online sales, helping buyers make more informed choices.

The standards also require websites to run checks for blacklisted terms such as banned breeds and to filter for misleading or inappropriate adverts. Websites that have so far agreed to comply with the voluntary standards took down over 130,000 adverts within the first six months of the scheme's launch. The PAAG standards are making an impact, however, the vast majority of adverts we monitored were on Gumtree, which subscribes to the PAAG standards, with some of them clearly not meeting the standards. The Blue Cross' and Born Free Foundation's "One Click Away" report identified that one of the websites that chose not to engage with PAAG's initiative also had the highest number of primates being advertised for sale.

We therefore recommend that complying with these standards is made mandatory for all classified websites and that an independent body is given the responsibility of overseeing compliance.

2. Commercial breeders of any vertebrate species should require a licence to sell anywhere online

Unlike dogs, the breeding of non-dangerous exotic animals currently requires no licence whatsoever. We believe that this absence of regulation is one of the key factors behind the low welfare standards that have become common in online sales.

We are therefore calling for the Scottish Government to require licensing for the breeding of all animals, including exotics, with the aim of protecting the welfare of animals that are used for breeding and their offspring. We believe that this system should be designed with the online trade in mind. This would mean a transparent system that is based on a centralised, publicly accessible list of registered and licensed animal breeders and sellers. This would allow a mandatory requirement to display a licence number which links to the official record on a central online database on all adverts and, for example, Facebook posts. It would provide prospective buyers with a transparent and verifiable guarantee of origin and that minimum welfare standards are met.

The licensing system is already being updated and streamlined as part of parallel review processes in Scotland and England. These reviews provide a major opportunity to introduce such a licence system and must take account of the increasingly important role that internet sales play in the pet industry.

As well as providing a transparent means of regulating commercial breeders, we believe that the system should include provision for ad hoc sales as a result of one-off or non-intentional breeding. In such an instance, the owner could apply for a fast-tracked registration number in order to sell their animals. This would be a light-touch and free process that would encourage best practice in such sales and help ensure that commercial breeders cannot operate under the licensing radar.

3. Owner education

Ultimately pet welfare depends on owners understanding the needs of their prospective pets, making an informed decision and then ensuring they meet the needs of their pet throughout their lives. With internet sales and more species available, this goal is only becoming more challenging. As a minimum, there should be a legal requirement for care information to be given by sellers at the point of sale, regardless of whether this is online or in a shop. Ideally, however, we would like to see a concerted effort to engage with prospective owners and existing owners with a view to improving their understanding of their pet's needs. These standards would be applicable to all pets being traded, including puppies and kittens, and would best be delivered as a collaboration between industry, the Scottish Government, and animal welfare charities. Any education programme should cover:

- The basic care needs of any animal
- The need to research the specific care needs of individual species before taking them on
- The legal obligations and ethical duties of pet owners
- Common welfare concerns and ways to avoid them, such as how to avoid purchasing from a disreputable breeder or how to check that an animal has come from good breeding stock
- Reference to organisations that can offer additional advice and support, such as the Scottish SPCA

4. Restrict species of pets available by implementing a positive list system

The recommendations above can do much to change the culture of pet-keeping and acquisition, and to improve the welfare of animals in private keeping. However, there are many exotic species, such as primates, that are fundamentally unsuited for life in domestic captivity and should simply not be kept as pets.

OneKind promotes the positive list approach, which provides a concise list or lists of animals that may be kept, based on an independent assessment of their suitability for different categories of owners. Listing provides clarity for owners and enforcement agencies, reduces bureaucracy, including administrative costs and the burden of arbitrating disputes, and contributes to demand reduction, as recommended in a recent EU report²⁷.

Belgium established a functioning positive list for mammals in 2009, successfully limiting the illegal trade in exotic pet mammals, and the government is now preparing a positive list for reptiles. A similar approach has been taken in the Netherlands, where mammal lists came into force in February 2015. Suitability criteria were determined by Wageningen University researchers supported by two specialist scientific committees. The three mammal lists cover animals that are suitable for all keepers, those that may be owned by more specialist keepers, and those that are deemed unsuitable and are therefore not permitted.

OneKind believes that this approach could and should be adopted by the UK administrations, starting with Scotland, and would bring demonstrable benefits to public health, to protection of biodiversity at home and abroad, and above all, to animal welfare. Not only has the positive list system been adopted successfully by other governments, it has also been tested and upheld by the European Court of Justice²⁸. The introduction of a positive list system can be achieved by modifying the Pet Animals Act 1951 through the use of powers conferred under s26 of the Animal Health and Welfare (Scotland) Act 2006. Sources

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Scotland's exotic pets

Why the internet trade in exotic pets in Scotland needs regulating





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