



The Federation of Veterinarians of Europe's

opinion on the:

Proposal for a Regulation of the European Parliament and the Council amending Regulation (EC) No 998/2003 on the animal health requirements applicable to the non-commercial movement of pet animals

Summary

- The Federation of Veterinarians of Europe (FVE) welcomes the EU Commission's proposal to amend Regulation (EC) No 998/2003 on the animal health requirements applicable to the non-commercial movements of pet animals.
- FVE supports the extension of the derogations until the end of 2011. In particular to allow the EU Member States in which rabies still occurs, to make adequate efforts to complete the eradication of rabies within the EU.
- FVE calls upon the EU Commission and Member States to pay extra attention to the effective implementation of the (amended) Regulation. Awareness of the issues should be enhanced and communication with travellers improved.
- FVE recommends that in addition to requirements for non-commercial movement more attention should also be given to the commercial movement of companion animals, especially puppies.
- FVE recommends that the EU Commission initiates an EU wide echinococcosis risk assessment, which should be followed by an appropriate prevention and control strategy throughout the Community.
- FVE also recommends further investigation into the spread of ticks and tick borne diseases in the Community and the development of an EU strategy to reduce the incidence of these diseases, based on the outcome of these investigations.
- FVE strongly supports the inclusion of companion animal diseases, in particular those that can affect public health, in the EU Animal Health Strategy for the European Union (2007 - 2013): "Prevention is better than cure".
- FVE encourages the promotion of permanent identification and accessible registration of all pet dogs and cats in the Community. In addition, information sharing between existing registration databases should be improved.

President

Walter Winding

Vice-Presidents

Christophe Buhot
Ljiljana Markuš
Rainer Schneichel
Stephen Ware

Members

Austria
Belgium
Bosnia-Herzegovina
Bulgaria
Croatia
Cyprus
Czech Republic
Denmark
Estonia
Finland
France
FYROM
Germany
Greece
Hungary
Iceland
Ireland
Italy
Latvia
Lithuania
Luxembourg
Malta
Montenegro
Netherlands
Norway
Poland
Portugal
Romania
Serbia
Slovak Republic
Slovenia
Spain
Sweden
Switzerland
Turkey
United Kingdom

Observers

Albania
Ukraine

Sections

UEVP
Practitioners

EASVO
State Officers

UEVH
Hygienists

EVERI
Veterinarians in
Education, Research
and Industry

The Federation of Veterinarians of Europe welcomes the EU Commission's proposal to amend Regulation (EC) No 998/2003 on the animal health requirements applicable to the non-commercial movements of pet animals. It is one of the Federation's core objectives to

protect both animal and public health and through contributions to the EU "One Health" policy FVE has shown a strong commitment to this issue.

The Federation believes that the measures to prevent and control of animal diseases in the Community should be proportionate and based on sound, scientific evidence and that harmonised approaches should be used whenever possible. In parts of the Community where harmonisation is not possible control strategies should also be based on science and should apply to all areas in the Community where similar situations occur.

The Commission's draft proposal aims to reach a fully harmonised situation, with regard to the non-commercial movement of pet animals within the EU, by the end of 2011. This gives a further 18 months for complete rabies eradication to be achieved within the EU and also allows extra time for the preparation of alternative arrangements if necessary.

Rabies

Rabies is a major public - and animal health concern. In case contamination leads to infection and disease it is almost 100% fatal. Worldwide, the number of human casualties lies around 50 000 each year. Successful intensive vaccination campaigns, in companion animals and susceptible wildlife, have resulted in the eradication of the disease in most of the EU member States.

Vaccination requirements as laid down in the articles 5 and 8 of Regulation (EC) No 998/2003 have shown to provide for a reliable protection against the international spread of the disease by companion animals. Sporadic introductions of infected animals into rabies free EU Member States in recent years have all been traced back to non-compliance with the provisions of the regulation or from transmission from affected wildlife.

FVE therefore calls upon the EU Commission and individual Member States to pay extra attention to an effective implementation of the legislation. Well functioning Veterinary Services, and adequate systems for early warning and a reliable tracking and tracing of animals are indispensable for the prevention and control of the spread of virus. Awareness of the issues should be enhanced and communication with citizens, in particular with travellers, improved.

In addition to the regulation about the non-commercial movement of pet animals ample attention should also be given to the commercial movement of companion animals, especially the international trade in puppies. The number of puppies, both legally and illegally, transported throughout the community for commercial reasons has increased. FVE is concerned that the illegal movement has had negative consequences on the animal health and welfare as well as increasing the risk to public health.

FVE believes that EU Member States where rabies still occurs should make adequate efforts to eradicate rabies within their territory by the end of 2011.

Echinococcosis

Another disease which can have very serious consequences for companion animals as well as for public health is echinococcosis, caused by the tapeworm *Echinococcus multilocularis*. The eggs of this endoparasite can be ingested by people after having been transmitted by companion animals as well as by wildlife, notably foxes. Currently, five EU Member States apply additional measures with regard to the treatment of companion animals against tapeworms, when entering into their territory.

EFSA, in its scientific opinion on the risk of introduction of echinococcosis stated that treatment, 24 to 48 hours, prior to movement reduces the risk to almost negligible. However, the effect of such treatment on (the reduction of) the total risk of echinococcosis could not be quantified. EFSA therefore recommended that surveillance systems in wildlife and pets should be established urgently in Europe in order to define risk areas and criteria for freedom from *Echinococcus multilocularis*. This is especially critical because there appears to have been an increase in parasite prevalence over time as well as indications that the parasite has extended its range.

FVE therefore urges the Commission to initiate, as soon as possible, an EU wide echinococcosis risk assessment to be followed by an appropriate prevention, reduction and control strategy throughout the Community.

Tick borne diseases

Over the last few decades ticks have spread northwards and into higher altitudes. This together with the occurrence of milder temperatures seem to have increased the prevalence of ticks throughout the EU. Correspondingly, the spread of tick borne diseases, such as Lyme disease and tick borne encephalitis, have followed the same pattern. Although the EFSA opinion states that relevant tick species seem to be widespread in Europe, current surveillance systems for tick species and tick borne diseases are limited and incomplete.

FVE therefore recommends further investigation into the spread of ticks and tick borne diseases in the Community and the development of an EU strategy to reduce the incidence of these diseases, based on the outcome of these investigations. It is possible that this course of action might be more effective than just treating a number of companion animals that cross certain national borders, for individual Member States as well as for the Community as a whole.

Companion animal and zoonotic diseases

A whole range of diseases, caused by viruses, bacteria, fungi, ecto and endo parasites (including protozoa), can be transferred from companion animals to people. Disease symptoms can vary from negligible to very severe or even fatal, depending on the species, the individual's immune status and the pathogen(s) involved.

Until recently the EU's animal health policy has mainly been focussed on large animal diseases, especially those which would have a large impact on international trade arising from possible consequences for animal health and/or public health. FVE supports the initiative to include companion animal diseases, in particular those that can affect public health, in the Animal Health Strategy for the European Union (2007 - 2013): "Prevention is better than cure".

In order to prevent and control transmissible diseases, FVE encourages the promotion of permanent identification - by means of internationally accepted (ISO) transponders – together with easily accessible registration of all pet dogs and cats, to begin with those travelling in the Community. In addition, information sharing between existing registration databases should be improved for the benefit of the animals, the owners and the Community.

