

# **Final Report of the Exotic Pet Working Group Scottish Animal Welfare Commission**

**November 2022**

# **SCOTTISH ANIMAL WELFARE COMMISSION**

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### **1. Introduction**

This is the final report from the Scottish Animal Welfare Commission (SAWC) on the welfare of exotic pets.

### **2. Scope**

This final report considers animal welfare issues surrounding the keeping of “exotic pets” in Scotland and the potential need for further regulation.

### **3. Background**

The Scottish Government announced in 2015 that it intended to review the trade and importation of exotic pets, citing potential threats to animal health and welfare, human health and native species in Scotland (Scottish Government, 2015). An interim report was published in July 2021 ([Exotic pets - Scottish Animal Welfare Commission: interim report - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/interim-report-on-exotic-pets/pages/1-2.aspx) ) and should be read along with this report.

### **4. Further evidence gathered**

#### **4.1 Literature Review**

Scottish Government through the SRUC was able to commission a literature review of the welfare of exotic pet species in the current literature, which is also published (see [Evidence on the welfare of exotic pets in Scotland](#)). The review focuses on species believed to be for sale in Scotland and focuses on commonly kept exotic pets. It excludes species already banned due to CITES or non-native invasive species legislation, and very common exotic pets, such as rabbits, commonly kept small rodents (except dwarf hamsters) and canaries.

One of the most significant findings from the review is the paucity of suitable published information on the health and welfare of exotic pets in Scotland. Most publications appear to be of a veterinary nature and frequently report individual studies or case series and so give only brief insights into welfare issues in certain

species. However, some logical conclusions can be drawn from basic principles that are reflected in the literature. For example, where a species has often complex dietary, environmental and social needs, the likelihood is that they will be more challenging to keep well, and welfare and disease issues will more frequently be seen. For example, primates and some parrot species are over-represented in the literature with metabolic, self-harming and other welfare-related issues when their complex needs are not met and when their hand rearing for the pet trade can often lead to psychological issues in later life.

Some exotic species that have been deliberately bred to produce certain desirable physical characteristics seem to be more susceptible to disease (e.g., so-called reptile 'colour-morphs' such as ball python spider morphs with neurological disease).

Although there is no evidence specifically from Scotland, there is some evidence from publications outside Scotland that exotic pets are less frequently presented to veterinary practitioners in comparison with domestic species. Two publications in the Republic of Ireland indicate that only 50% of exotic pet owners consulted a vet in 2019 (Goins and Handon, 2021a, b). Part of this reluctance is likely to be financial, but part is also likely to be the lack of veterinary surgeons with expertise in exotic pets, a situation supporting the data already gathered from UK veterinary schools and Scottish veterinary surgeons by the working group and published in the interim report.

In conclusion, the literature review helps to identify some key areas of concern, but also demonstrates the difficulty in obtaining clear evidence of an association with the keeping of exotic pets with poorer or better welfare than that already reported in domesticated pets. There is evidence that breeding for particular phenotypic traits does lead to increased disease susceptibility and hereditary abnormalities, and evidence that the more complicated a species' husbandry requirements are, the more likely it is to experience poorer welfare in captivity. However, in our opinion more evidence of the level of exotic pet trade, species traded, and where possible any associated welfare issues needs to be gathered going forward.

## **4.2 Further evidence**

The working group also considered further detailed feedback on the interim report from a number of exotic pet representatives, including the Ornamental Aquatic Trade Association and the Federation of British Herpetologists.

One concern raised, both in the interim report and by correspondents, was the definition of what constitutes an 'exotic' pet. Many respondents suggested that species could be termed domesticated and therefore not 'exotic' simply because they had been bred in captivity for many years or even centuries. The working group believes that the term 'exotic', whilst difficult to fully define, should focus on whether an animal is truly domesticated or not, i.e. an animal is considered domesticated when its behaviour, life cycle or physiology has been altered as a result of the breeding or living conditions over multiple generations of animals of that kind being under human control, rather than simply the historical length of time an animal has

been kept in captivity by humans. As such its morphology, genetics and behaviours are likely to be substantially different from those of their wild ancestors, such that survival in the wild would likely be compromised.

Observations regarding the benefits to human livelihoods through importation of exotic pets, including removal of animals from the wild for the pet trade, were also made by respondents. Whilst the working group feels that ethically, wild capture of animals for the pet trade is not justified and acknowledges that there is some uncertainty as to the level of wild-caught animals traded, (to take one example, numbers of wild-caught and traded marine fish varying from 90% (OATA, 2021) - 99% (Biondo and Burki (2020))), the working group is focussed on the welfare of traded animals. We also acknowledge that welfare is just one facet of the important factors that need to be considered; others include the potential for zoonotic disease transmission, animals' destructive or invasive potential, and their physical hazard to humans and animals. Animal welfare is the key area with which this group is concerned, and which is the focus of this final report.

Criticism was raised by respondents over the nature of some of the journals quoted within the interim report, suggesting that some were 'predatory' and therefore questioning how robust their peer-reviewing was (FBH, 2021). While that is an important question, the working group has confidence in many of the papers cited. It is also important to note that most of the references in the interim report are cited within the views of stakeholders. The working group has tried to quote stakeholders across the spectrum of exotic pet keeping, animal welfare advocacy and veterinary opinion, in order to maintain as unbiased a view as is possible.

Concerns were also raised regarding an observation in the working group's report, which was regarded as an assertion, that poor record keeping is commonplace, making it difficult to quantify the volume of wild animals being traded as pets. Here, the working group was quoting Toland *et al.* (2020), who point out that non-CITES species international trade is not systematically recorded; in addition, the working group's investigation into licensing authorities in Scotland and the wider UK demonstrated considerable variation in the details of numbers of traded animals with particularly poor data on the traded species.

Records may be kept by individual traders, but the information is not being systemically collated by licensing bodies and so is inaccessible when attempting to quantify the level of trade at a local or national level.

## **5. Final conclusions**

### **5.1 Need for further information**

Evidence gathered for this report, as published in our interim report, has highlighted the lack of consistent, objective information about the importation, capture, breeding, trade, transport, keeping and regulatory monitoring of a wide variety of animals in Scotland in a wide variety of settings. However, the literature review does confirm the patchy nature of peer-reviewed welfare assessments in exotic pets and suggests

that certain species and particularly the trends for breeding so called 'colour morphs' are more prone to recorded problems. It also points to the welfare issues around the management of species that require more complex husbandry (such as primates and many reptile and aquatic species) and, with growing concerns around animal welfare and sentience, these issues cannot be ignored.

At the time when the working group was initially gathering information for the interim report on licence conditions and record keeping, the Pet Animals Act 1951 still applied in Scotland. Since that exercise was undertaken, the Animal Welfare (Licensing of Activities Involving Animals) (Scotland) Regulations 2021 have come fully into force. Schedule 3 of the Regulations sets out specific licence conditions for selling animals as pets in the course of a business (a definition that covers all commercial sales of animals, including internet sales).

The Regulations provide that a register must be maintained for all the animals or groups of animals (such as fish) on the premises. In addition to details about the animal itself, such as age and sex, the register must include the full name of the supplier of the animal, the date of its acquisition, the date of the sale of the animal by the licence holder or the date of the animal's death, if applicable. All of these records must be available for inspection in a visible and legible form, either on the licensed premises or, if held elsewhere, kept in a manner in which they can be readily made available to an inspector.

SAWC believes that the setting down of these conditions in legislation (rather than relying on local authorities to implement model conditions at their discretion), has the potential significantly to improve knowledge and understanding of the different species being traded in Scotland, how many animals are involved, where they come from and how they thrive in retail or breeding premises. SAWC recommends that local authorities gather this information on a systematic basis, for example by requiring retailers to present it on a quarterly basis as part of their obligations under the licence.

## **5.2 Welfare and ethical issues of trading in animals captured from the wild**

The working group reiterates its concerns about the trade in wild-caught animals purely for the pet industry and, whilst there are arguments for this trade from a human perspective, it cannot justify or support this continuing trade on animal welfare or ethical grounds. Our view regarding the ban on the importation of wild-caught animals purely for the pet trade is also held by many other organisations, such as the British Veterinary Zoological Society and British Veterinary Association. Our particular concern is not only the sudden change from the wild to captivity, to which the animal has to rapidly acclimatise, but also the frequently long transport times from the country of origin to their final destination in Scotland. This transportation often results in inappropriate environmental conditions (space, heat, light, nutrition, humidity provision, etc.), leading to compromised welfare and in some cases mortalities.

### 5.3 Regulation

There is evidence that for many species of pet, domesticated or exotic/non-domesticated, our understanding of how to keep that species in a welfare-friendly manner is good. However, there is also growing evidence that for many species of non-domesticated/exotic pet this is not the case and that whilst self-regulation may have many positive benefits for industry and government, it is failing to manage the extent of the current problem.

It is our view that negative lists of species (the listing of those effectively ‘banned’ from being kept in captivity) are difficult to manage from a legislative and enforcement perspective due to the sheer breadth of species that can potentially be kept and substituted. However, we do see merit in the different positive listing approaches being adopted in several countries across Europe. Some of these models, while introducing lists (of varying length), allow a degree of flexibility whereby specialist keepers with the knowledge and facilities for providing acceptable welfare for animals in their care can apply for individual permissions or for the addition of certain species to the original list, if they can provide robust evidence that these species can be kept in such a way as to meet their welfare needs.

The working group has considered a “traffic light” system for non-domestic/exotic pet keeping, where so-called green-listed species (such as dogs, cats, rabbits and mice) are permitted for keeping by responsible persons over the age of 16 (as set down in the Animal Health and Welfare (Scotland) Act 2006, s.18) as long as all care guidelines and animal welfare legislation are observed. Amber-listed species would be those requiring more knowledge and experience on behalf of the keeper and therefore an assessment of keeper competency. Red-listed species would be typically those species that should only be kept as pets by specialist qualified and licensed keepers. However, the working group has concluded that the listing of amber- and red-listed species would be extremely complex and time-consuming, potentially delaying the necessary reform to protect larger numbers of other animals. In addition, this approach would require considerable licensing authority inspection and regulation, which could become extremely onerous.

Therefore, it is our view that a single list of permitted species (the listing of only those species which can be legally kept as pets, with all others being prohibited unless an individual licence has been obtained by specialist keepers), while being less nuanced than a traffic-light system given the very large numbers of species involved, has the advantage of clarity and would be easier to enforce.

Examples of specific licensing can be found in European states, such as Belgium, where individuals may apply for authorisation to keep species that are not on the positive list, subject to the provision of evidence of competency and suitable accommodation and care for the animal. Responsibility for authorising the keeping of the animal lies with the regional ministries.

Animals that are not on one of the lists should not be kept. Transitional arrangements in the form of “grandfather provisions” could be agreed, to allow non-listed animals already in private ownership, where owners may lack expertise, to be

kept until they die, but not bred or otherwise replaced. This is a standard provision in existing positive list systems in European countries.

As in other countries, for practical purposes a permitted-list system could initially be introduced for certain classes of animals, such as mammals and reptiles, with a view to expanding this to include other classes in due course as information is collated about the suitability of different species to be kept as pets. For example, legislation in the Belgian regions allows persons to make representations in favour of adding currently non-listed mammals (and also reptiles in Flanders) to the lists.

## **6. Recommendations**

**6.1** A single list of permitted species of animal that may legally be kept as pets should be compiled, drawing on the experience of other countries where such lists have already been compiled and applying it where relevant to Scotland.

**6.2** SAWC believes there is sufficient evidence to make the decision in 6.1 but advises that more detailed information of the level of exotic pet trade, species traded, and any associated welfare issues should be gathered, drawing on the enhanced record-keeping and reporting requirements of the Animal Welfare (Licensing of Activities Involving Animals) (Scotland) Regulations 2021. SAWC recommends that local authorities gather relevant information on a systematic basis, for example, by requiring retailers to present it on a quarterly basis as part of their obligations under the licence.

**6.3** Provision should be made for derogations for individuals, who already own non-listed species at the time when the legislation comes into force, and for individuals or groups to apply for a non-listed species to be added to the list. Individuals should also be able to apply to keep a non-listed species, subject to evidence of competency and suitable facilities to ensure the animals' welfare.

**6.4** SAWC also supports the views of pet-keeping bodies, such as the Federation of British Herpetologists (FBH), and veterinary organisations, such as British Veterinary Zoological Society (BVZS) and British Veterinary Association (BVA), when it comes to the breeding of so-called 'colour-morphs' and recommends that these should not be bred where evidence of hereditary defects is observed.

**6.5** SAWC advises a ban on the importation of wild-caught animals for the pet trade.

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