

DEFRA Consultation¹ on veterinary border checks on rabies-susceptible animals

Response from the Medical Research Council (MRC), the Wellcome Trust and the Biotechnology and Biological Sciences Research Council (BBSRC)

Introduction

1. The MRC, Wellcome Trust and the BBSRC are grateful for the opportunity to respond to the DEFRA consultation. This is a joint response from our organisations.
2. This response reflects the outcome of our own consultation with our researchers who use imported animals.
3. BBSRC's total research spend in 2007/08 was £380 million. Approximately 22% of BBSRC research grants/projects involve some use of animals (as under the current Animals (Scientific Procedures) Act).
4. MRC's total research spend in 2007/08 was £618 million. Approximately 20% of projects involve some use of animals (as under the current Animals (Scientific Procedures) Act).
5. The Wellcome Trust's total research spend in 2007/08 was £525 million. Approximately 24% of projects involved some use of animals (as under the Animals (Scientific Procedures) Act).
6. Our preferred option is Option 1 or 2. These options meet the objectives of the policy to ensure that imported animals do not present a risk of introducing rabies or any other animal or public health threat into the UK. Further reasons for supporting these options are detailed below. We strongly oppose Option 3. The introduction of veterinary checks for all animals from outside the EU at Border Inspection Posts (BIPs) would have an adverse impact on animal welfare and would lead to increased costs and bureaucracy - with a resulting detrimental impact on the competitiveness of the UK bioscience sector, and ultimately human and animal health.

Comments on the positive and negative impacts on your business/organisation of each option

Option 1 – Check all rabies susceptible animals at destination (current practice)

Positive impacts:

7. **Proportionate and effective regulation:** The current system provides proportionate regulation by ensuring any risk of infection is minimised, whilst minimising travel time for animals which is imperative to good animal welfare. It is also reasonably efficient.
8. **Optimal animal welfare:** The current system allows flexibility in transport routes to ensure the shortest route from supplier to institution is taken, thereby minimising transport time for animals. Upon arrival animals are checked by professional staff, expert in the care and welfare of laboratory animals.

¹ www.defra.gov.uk/corporate/consult/rabies/index.htm

9. **Reduced risk of contamination:** The current system reduces the exposure of pathogen-free laboratory animals to other animals and facilities which may contain pathogens, greatly reducing the risk of contamination.

Negative impacts:

10. While the potential to detect sick animals at the earliest opportunity might be missed with this option, this is far outweighed by the negative impact of increased travel and waiting time for laboratory animals and the increased risk of contamination.

Option 2 – Check laboratory animals at destination

11. The medical and bioscience research communities are not concerned with importation of zoo animals or pets, so this option for the research community is effectively equivalent to Option 1. Clarification is required, however, of the species covered under the term “laboratory animals” as it is not defined in the consultation document.

Option 3 – Check all imports of rabies-susceptible animals at BIPS

Positive impacts

12. In some cases where the health status of animals has deteriorated during transport, this may be detected early, with some benefit to animal welfare. However, the positive impact is far outweighed by the negative impacts set out below.

Negative impacts

13. **Adverse animal welfare:** Increased journey times and longer distances that animals need to travel to BIPs will have a significant adverse impact on animal welfare without any corresponding benefits. Time spent waiting for a BIP check will also increase stress levels in animals. If all animals are to be routed through Heathrow and Gatwick, then significant delays may be encountered on days when large consignments of commercial animals arrive. Paragraph 7.3 of the consultation document suggests that welfare will be improved as animals such as cats and dogs will be released from their boxes on arrival at the BIP instead of staying in them until being released in the quarantine premises ‘which may be several hours’. This clearly is not possible for laboratory animals such as rodents, rabbits, and non-human primates which are pathogen/virus free, because opening their boxes will render them vulnerable to contamination.

14. **Increased risk of contamination:** This option presents significant increased risks of contamination due to:

- a. Risk of contamination at a BIP facility spreading to otherwise clean animals;
- b. Risk that a pathogen picked up at a BIP facility may be transported to individual institutions and risk contamination of animals located there; and
- c. Increased human to animal contamination if animals need to be handled by vets at both a BIP and again at point of destination.

15. Some animals are imported with a high health status, in sealed “specific pathogen free” containers which, if opened, may render the animals useless and could risk contaminating the destination unit. Genetically modified mouse lines may cost in the vicinity of £20,000 to £30,000 per mouse line, and therefore contamination of the animals is a considerable waste of resources and animals. The consultation document suggests that boxes will not need to be opened if they have viewing windows. If this is the case, it is not clear what illnesses could be detected by merely observing animals through a

window. In boxes that have been environmentally enriched (e.g. contain foraging and bedding material), it may be difficult even to see the animal through the window to inspect them.

16. Research facilities often employ strictly adhered-to exclusion periods (often of 48 hours or more) between exposure to rodents of different health status – it is unlikely BIPs will be able to adhere to the same time-frames.

17. **Reduced scientific collaboration:** Importing laboratory animals is time-consuming, expensive and complex. Therefore animals are only imported if they cannot be sourced in the UK. Making it more difficult to import animals may reduce the ability of UK scientists to collaborate in major international projects which share mouse resources, significantly affecting their international competitiveness. For example, most imported rodents are genetically altered to allow study of a specific gene or molecular pathway, or to simulate a disease. They are shared internationally to avoid duplication of time and cost and animals in creating them locally.

18. **Increased costs of animal research:** This option carries a significant increased burden of costs, both for the veterinary check² and as a result of additional transport. Such fees will be passed on to the researcher and hence research funders. Since the BIP handling fee is levied by the operator at each airport, this could be subject to uncontrolled price rise, since there are so few operators. We are concerned that the risk assessment significantly underestimates the increased cost of transport for Option 3. The impact assessment estimates an increased fee of £250 as a result of the need to change the route for a third of consignments. However, the Laboratory Animal Breeders Association (LABA) estimate that travel cost increases will vary from £250 (Birmingham) to £1,000 (Aberdeen) per consignment of animals to divert them to a BIP for checking³.

19. **One-off capital costs to be covered by users:** The impact assessment notes that only two airports have BIP facilities which would take rabies susceptible animals. Since both are located in the south-east, this significantly disadvantages institutions in Wales, north of England and Scotland. Increasing the number of BIPs to reduce the workload on the two existing BIPs would require upgrading the animal containment facilities at existing airport facilities to meet BIP standards. The cost of upgrading a facility is estimated to be between £500,000 and £800,000, this covers the capital cost only and does not consider the cost of operating the facility. Since facilities are run by private operators, the cost increases would presumably be passed on to the importers.

20. **Increased bureaucracy and uncertainty:** Option 3 would significantly increase the bureaucracy for importers of animals. Importers would be required to fill out a Common Veterinary Entry Document (CVEDA) to ensure BIPs were given 24 hours notice of arrival of a consignment. This may not always be possible, since individual pilots could 'bump' containments of animals to other flights should they not wish to carry them. Therefore the arrival time of a shipment of animals is not always known. If, as noted by paragraph 5.8 of the DEFRA impact assessment, importers find the additional burdens too great and decide to import from other EU Member States, to avoid border checks, this will again significantly increase costs and the time required to obtain animals. Should either of the two current BIPs be subject to strike action, demonstrations, weather and infrastructure breakdown, the supply route of animals may be indefinitely closed down.

²Noted in impact analysis as £25 for vet check, plus £114 for BIP handling fee.

³ LABA estimates based on £1.10 per mile for round trip.

Any additional impacts not described included in this consultation paper

21. Whilst it is understandable that there is pressure for the UK to conform to the requirements of EU Directive by carrying out veterinary checks on entry, there is little reason to do so beyond European harmonisation. Furthermore, it is not clear that other Member States implement the Directive as rigorously in national legislation. It would seem that the definition of 'vet check' differs between Member States and that it may not necessarily require a 'physical check' in some States.

22. Whilst the academic sector may not currently import animals on as large a scale as industry, the rising cost of breeding animals for research purposes in the UK may force researchers to look overseas for supply in the future. Option 3 would significantly reduce any cost benefit of sourcing animals from outside the EU and may force animal research to be conducted outside the UK and the EU entirely.

23. Preferred option

In the light of the above analysis of advantages and disadvantages, our preferred option is **Option 1**, maintaining the status quo; or alternatively **Option 2**.

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