

Executive summary

- The war in Ukraine is leading to many refugees bringing pets that do not meet current health requirements to enter the UK.
- Rabies is present in animals in Ukraine, as well as some other important zoonotic diseases not present in the UK.
- Most pets will be non-compliant pets with our entry health rules so they should be placed in official quarantine until compliance is achieved (maximum 4 months).
- There are very limited quarantine spaces across Great Britain (around 150), which are dwarfed by the numbers of Ukrainian pets potentially arriving, with already over 400 and rising licence applications logged with the Animal and Plant Health Agency (APHA), on a GB basis.
- Defra and Scottish Government have already agreed that quarantine can be undertaken in 'home containment', once official quarantine spaces are exhausted, as a last resort.
- This decision by other governments is based on the premise that alternative options (such as re-exporting the pets or euthanizing them, or refusing entry of refugees with pets,) are unpalatable and the humanitarian factors are more important.
- However, we have a duty to protect Welsh citizens and animals, and we are concerned about the risks to public and animal health of bi-passing standard quarantine requirements by keeping such animals outside officially approved premises.
- [redacted: section 43] just opened 34 additional spaces in a new approved quarantine but this is only for dogs (not cats) and may not be enough, depending on numbers. It will buy us time, however.
- **It should be noted the risk of rabies (and some other important zoonotic diseases) are not insignificant and in our veterinary opinion, home containment cannot be recommended by OCVO.**
- We continue to explore alternatives to "home containment", including existing facilities in Government estates, in local authorities, police and army, and private kennels and catteries. None of these options has yet proved viable for various reasons, but Monmouthshire LA is still investigating the possibility of erecting new facilities. Further advice will be given on that, but any such facilities would require funding.
- You will be asked later to decide whether Wales might adopt a home containment approach (as an absolute last resort), similar to that in England and Scotland, or not allow home containment, or any alternative option based on the investigations we are conducting.

Background

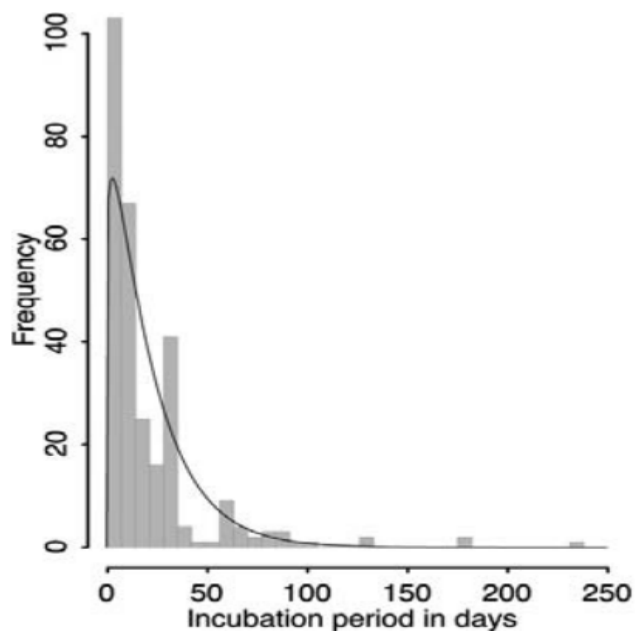
Following the Russian invasion of Ukraine, Ukrainian people have been fleeing the country to find refuge. It has been estimated over 100,000 people fleeing from Ukraine will arrive in UK over the coming weeks and a number of these individuals have been, and will continue, to bring their pets with them. Pets, in the context of this advice, means dogs, cats and ferrets.

Rabies is a very high impact zoonotic disease. Infection leads to death in 100% of cases human or animal, where there is no intervention. Post Exposure Prophylaxis of people is only effective if it is given before the onset of symptoms, therefore the tracing of contacts as quickly as possible is essential.

Given the unplanned departure from Ukraine, it is expected many of these pets will not be compliant with the animal health requirements for entry. The pet travel requirements for unlisted third countries (such as Ukraine) mean non-compliant animals would be subject to a maximum four months period in approved quarantine upon arrival.

During this period, a veterinary assessment will inform actions needed to obtain compliance, and/or determine the time of official quarantine needed. These actions may include vaccinating animals for rabies, treating them for tapeworm, testing for rabies antibodies and undergoing a wait period – this is essentially ensuring the associated disease risks are minimised.

A key uncertainty with rabies infections in pets is the incubation period. The majority of infections will result in clinical signs within the first month, and the vast majority within four months. However, incubation can take up to years in rare cases.



You will recall agreeing to the use of the ELISA test through The Non-Commercial Movement of Animals (Amendment) (Wales) Regulations 2022, made on 7 April, as a quicker test to check rabies antibody levels after vaccination. Defra's approach is to use ELISA, together with the time since pets left Ukraine, as principal risks markers in their decision about releasing a pet into home containment.

In practice, if the animal left Ukraine more than 30 days ago and passed the ELISA upon arrival, it will be allowed to move directly to home containment where it will be kept for three months. If it left Ukraine less than 30 days prior, it will complete the 30 days waiting time in quarantine before being tested and allowed to proceed to home containment.

However, the single most important factor in determining whether an animal is infected with rabies is the time elapsed since it left the country where it might have been exposed to the virus.

Due to the high likelihood of pets of Ukrainian refugees being non-compliant, to manage the numbers coming in and distribution into quarantine facilities, the APHA has set up a pre-entry application and licensing process. These licences are issued under powers in Article 4(3) the Rabies Importation Order (RIO) 1974. (They should not be necessary for landings in Wales, as we do not expect any landing directly in Wales, as none of our ports and airports are approved pet carriers).

Overview and risks of Rabies

Rabies is a very high impact zoonotic disease. Infection leads to death in 100% of cases human or animal, where there is no intervention. Post Exposure Prophylaxis of people is only effective if it is given before the onset of symptoms, therefore the tracing of contacts as quickly as possible is essential.

As the UK has been free of classical rabies since 1922, we do not have a programme of compulsory rabies vaccination in animals and therefore the majority of animals in the UK would be susceptible if the infection was brought in from abroad. We also have a large susceptible wildlife population, including a high population of urban foxes.

The UK has a long history of risk management with respect to rabies. Our acceptable level of risk is very low for imported animals, which has been assessed quantitatively based on the number of pets entering the UK on an annual basis and has been managed with strict import and pet quarantine requirements.

Annually there are about 1,800 rabies cases in animals in Ukraine, of which more than half are observed in pet dogs, cats and livestock, and the others in wildlife. Sporadic fatal cases in humans have been registered despite preventive measures (based on annual numbers reported to the WHO Rabies Bulletin database for 2016-2021). We do not have data on how many people are treated with post exposure prophylaxis each year in Ukraine.

Mandatory vaccination of pet dogs is required in Ukraine, and of cats in infected areas. However, this is not completely effective, as evidenced by the number of pet cases per year.

Whilst the disease risk in legitimately owned pets is expected to be lower in comparison to rescue animals and those of unknown origin, without information on the number of animals infected in Ukraine, the number wishing to enter the UK, and their vaccination history, it is difficult to quantify this risk. However, based on the estimations made by risk analysts, if the UK took 1000 pets from Ukraine of unknown health status over a year, assumptions for a worst-case scenario indicate a 10% aggregated probability that at least one of these 1000 animals brought rabies with it. This means the risk is significant.

A case of rabies in an imported animal outside of quarantine would have a significant impact, resulting in the loss of the UK's disease-free status for 6 months and for a case in a wild animal, a two-year loss of free status. Extensive vaccination of pets and wild animals would be required, coupled with surveillance and monitoring.

In previous cases where a rabies-infected animal has been imported illegally to an EU country, the associated tracing exercises have been known to involve several hundred people. For example, in Spain in 2013 over 110 people were given post exposure prophylaxis. The index case involved a dog, which had been incompletely vaccinated and was then exposed to an infected animal while travelling in Morocco.

The current UK Health Security Agency (UKHSA) guidance is that anyone who has been bitten, scratched or licked by an animal originating from Ukraine should be followed up and risk assessed for post exposure prophylaxis. Some people who come into regular contact with imported animals may be regularly vaccinated against rabies, and this will be taken into consideration by the UKHSA team.

Approved carriers and ports

Pets can only enter Great Britain through an approved carrier and approved port. These approvals are managed by the APHA and these carriers and ports perform checks on compliance with the pet travel scheme. There are no approved ports nor carriers in Wales so any landing of a Ukrainian pet in Wales would constitute an illegal landing. Cardiff Airport and the ferry operators have told Welsh Government that they would not expect any pets from Ukraine to land in Wales through their ports. If that were to be the case, they would notify the local authorities.

Any direct landing in Wales would be an illegal import, but the handling would be similar – such animals would be sent, under notice by the Local Authorities, to quarantine and enter the 'system'.

(The usual procedure for non-compliant animals is to have them quarantined at an approved facility, as re-export or euthanasia are either unpractical or very severe measures).

Approved quarantine facilities and capacity

Official quarantine facilities are approved by the APHA. They are standalone units, in the sense that they cannot be used for any other purpose and are officially called Approved Quarantine Units (AQU).

AQUs are limited in number in GB. As of 25 April, the total number of approved quarantine spaces in England and Scotland is 126 for dogs, 107 for cats and 65 for ferrets (with the current number of available spaces for the whole of GB now being practically zero). These spaces are being allocated on a “first come, first served” basis, accommodating pets destined for any part of GB, including Wales, with other facilities are being developed, including one just licensed in Cardiff, offering a total of 34 dog spaces (Dogs Trust) and operations from 29 April 2022.

Through the new licensing process for Ukrainians wishing to bring their pets to GB, as of 25 April, APHA reported the total number of license applications to be 591. 235 licenses have been issued so far but, as most quarantine spaces already are in use, this also means the majority of applications are outstanding with APHA unable to issue any new licenses, a situation likely to cause further distress to refugees fleeing with their pets.

UKG and Scottish policy on home containment

Aware of the escalating situation and constraints, UKG ministers consider that every effort should be made to ensure refugees wishing to come to UK are not stranded on the continent, and that we must facilitate their arrival without undue delay.

In light of the above, and noting that existing quarantine facilities will soon be unable to accommodate the high number of incoming pets, Defra ministers decided that, once quarantine spaces are exceeded, to forego the official quarantining of pets from Ukraine in AQUs. Instead, they agree animals should be moved to “home containment” (i.e. confining pets to their host home under certain animal and public health restrictions for up to 3 months) in certain scenarios as detailed below.

Defra has concluded home containment will be the only option once quarantine spaces become insufficient to meet demand. This means that UK Government is not considering other options, such as not allowing non-compliant Ukrainian pets to enter England until AQUs can accommodate them, for humanitarian reasons. This decision was brought before the Animal Disease Policy Group for information only on 07 April. Scottish Government is in alignment with the UK Government’s approach.

Defra is seeking a response from Welsh Government on whether Wales will adopt the same approach to non-compliant animals from Ukraine once quarantine spaces are exceeded. Due to potential significant animal and public health implications, the following risks should be considered to inform the decision for Wales.

We have been preparing this advice to you but have not yet asked you for an opinion on the matter due to the complexity of the legal advice. We expect to make a formal submission as soon as possible once cleared with lawyers; however, we would like to provide you with the veterinary advice in the meantime.

Veterinary Advice

We consider the home containment approach to carry significant risks to animal and human health and have serious concerns about alignment with Defra and Scottish Government's policy.

Animals of unknown and/or non-compliant health status may be infected with rabies, and/or other important infectious diseases.

We agree it is vital they are triaged and risk assessed before being moved into an AQU. The length of time spent in an AQU will then depend on key factors including time since departure from Ukraine and exposure to the risk of infection, and blood test results to evidence rabies vaccination. Quarantine aims to keep animals confined during the highest risk time for development of clinical signs of rabies, thus protecting the health of other animals and the public,

The length of quarantine is the single most important factor (more than vaccination history and blood testing) in determining how safe an animal is. The standard we apply is a total of four months quarantine and any reduction in that period means an increase in risk.

There have been examples of two dogs imported in Canada from Iran that showed signs of rabies at two and seven months respectively post importation. Only veterinary observation during the three-month waiting period can provide the sufficient assurance that the animal has not been infected with rabies at entry point.

Additional disease risks

Identifying a stray animal or one recently adopted will be difficult particularly as animals are receiving a microchip and EU pet passport as they enter the EU. Infectious diseases are more likely to be present in these categories of dogs and could present a risk to the owner or to other people or pets in the destination household. Vets, animal health technicians and local authority staff may also be exposed to the animals and should be taken into account for the public health risk.

We have previously estimated the risks of other diseases associated with the movement of cats and dogs from an unlisted third country. Several diseases are of concern, *Echinococcus multilocularis* (an exotic tapeworm) is the greatest risk (and another potentially fatal disease to humans) and treatment should be factored in for each dog, which arrives from Ukraine. Other potential diseases that can infect humans are of concern: *Brucella canis* tests and tick treatment should also be applied – these are easy procedures and the test turnaround time can be done quickly. While these diseases are less likely in pet animals than in rescue animals, it is sensible to target those being placed into quarantine, where the provenance is unknown.

Whilst we are confident tapeworm treatment can be administered upon arrival to the UK, we have been informed that neither tick treatment nor *Brucella canis* testing is to be offered with costings covered.

Public Health Wales advice

Dr [redacted: section 40(2)], Public Health Wales 12 April 2022:

“This is a problem that is likely to increase in complexity and with a potential long duration. The following are some of the points I have considered in drawing my conclusions.

- To date we (UK) has not seen the expected volume of applications to bring in pets from the Ukraine (UKR) via Poland, the number of applications is likely to increase over the next few weeks and months
- It has been estimated that there are about 5 Million dogs in UKR, of which approximately 1,000 test positive for Rabies annually
- Last Wednesday it was reported that quarantine spaces were available in E&W for 20 dogs and 20 cats and it is unlikely that the UK will be able to meet the potential demand for quarantine facilities in the short to medium term
- There are very few quarantine sites available at ports of entry and I understand no quarantine facilities in Wales at present
- Home isolation is potentially difficult to manage especially for dogs, cats and ferrets
- Home isolation for larger pets is likely to require provision and maintenance of strict biosecurity
- This (home isolation) will need to be preceded by a risk assessment from Defra (VENDU) veterinary advisers rather than private veterinary surgeons (PVS)
- Home isolation is potentially easier to manage for small animals including lizards and other reptiles, rabbits, hamsters, gerbils, rats and birds, all of which are likely to present a lower risk to human health although these animals are more likely to be smuggled in to other accommodation such as hotels, in luggage (as handbag pets).
- Appropriate triage of pets will be required based on risk (dogs & cats cf. birds and rodents) prior to housing in a domestic property
- There will need to be very close liaison and co-operation between all agencies involved (veterinary, public health, environmental health, etc)
- Especially for rabies, there will need to be absolute clarity by those caring for pets in home isolation on recognising behavioural changes by these animals and when to seek medical advice on what are usually considered normal pet (licking) behaviours and a recognition that bites and scratches can become infected for a number of reasons
- It is likely that pet behaviours will change following trauma associated with unusual transport and residence in an unfamiliar environment which is also now highly restricted; these will need to be closely monitored and assessed

- There will need to be clarity on the requirement for veterinary risk assessment if an individual has to go to A&E following unusual exposure to an animal imported from UKR
- Whilst in many cases, home quarantine of about 30 days since leaving UKR would cover the majority of the usual incubation period for rabies, it should be borne in mind that it can be longer, perhaps up to 7 months or even more before the virus can be fatal
- There will be illegal and sometimes mass attempts to import dogs especially by charities using false documentation

It will be impossible for the UK to meet the demand for quarantine facilities and we may have to apply mitigation criteria, which include the length of time a pet has been in Poland after an official rabies vaccination before transfer to the UK.

It must be assumed that pets imported from UKR will be housed with their owners in either accommodation part let, i.e. with the property owners still in residence, quite possibly with their own pets already present or, in a limited number of circumstances in accommodation wholly occupied by UKR refugees. The conditions for housing pets will be different in the two cases and will require different or additional support measures imposed by APHA.

In summary, I am not in favour of home isolation because of the corresponding complexities involving multiple agencies, not just over-stretched veterinary services, it may however be the only practicable solution in the short term if Wales and the rest of the UK are to accept refugees accompanied by their pets which they consider to be family members.

Allowing pets to be housed in peoples' homes with their refugee owners may have substantial benefits social, therapeutic and mental health of refugees to the extent it could reduce their need to access health and social services.

There will however be additional demands on health services in general (eg. A&E) and public health, for example, linked to risk assessments by virology specialists when someone is licked by an animal brought in from UKR, and sourcing and administration of rabies PEP with subsequent monitoring by the HPT."