



European Sled Dog Racing Association

To : Mr. John Dalli
European Commissioner for Health and Consumer Policy

CC: Mr. José Manuel Barroso
President, European Commission

From: The President and Board of Directors
European Sled Dog Racing Association

20 June 2010

Dear Commissioner Dalli,

At its annual Congress of Delegates held June 11, 2010, the European Sled Dog Racing Association was informed of Commission Regulation N° 388/2010 of 6th May 2010 implementing Regulation (EC) n° 998/2003 of the European Parliament and of the Council as regards to the maximum number of pet animals of certain species that may be the subject of non-commercial movement and henceforth limiting this to five pet animals. Hereafter, we would respectfully like to address you and the European Commission in order to express our profound concerns regarding this decision.

The ESDRA and its national member organisations have been organising sled dog races and other events in Europe since 1985. There are currently 23 national ESDRA member organizations throughout Europe. Every year there are, on the average, from five to thirty national and international competitions or other sled dog events in the majority of the ESDRA member countries, depending on the size of the country. Sled dog owners also move frequently and sometimes every weekend throughout Europe to participate in the European Cup events or in nearby races in a neighbouring country, as well as to participate in recreational sledding. The ESDRA also organises two European Championships, on-snow and off-snow, every two years. Sled dog activities and events represent, for the communities hosting them, a welcome source of additional income for the local hotel and catering industry, winter campgrounds, and shops.

The ESDRA is a founding member of the International Federation of Sleddog Sports (incorporated 1992.) The IFSS is a member in good standing of SportAccord, the former General Assembly of International Sports Federations (GAISF), as well as Signatory of the World Anti-Doping Association *Code* and has adopted anti-doping regulations for both humans and sled dogs that have been reviewed by the WADA and declared in line with the *Code*. Furthermore, the IFSS and the ESDRA have strong regulations concerning the welfare of the dogs that participate in our sports, both in-competition and out. ESDRA Regulations include the Guidelines for the Care and Treatment of Sled Dogs published by the organization *MUSH with P.R.I.D.E. (Providing Responsible Information on a Dog's Environment.)* It should also be noted that at sled dog events, the presentation of puppies for sale is strictly forbidden at the venues.

Furthermore, the IFSS and the ESDRA and their members are open to all persons and all types of dogs and thus promote the Olympic movement's ideal of non-discrimination in sports activities. Indeed, several ESDRA national members are also either full members of or recognized by their National Olympic Committees and others are currently in the process of joining.

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The IFSS World Championship sled dog races will be held in Norway in 2011, and considerable investment by the IFSS and the national and local organisations and financial partners has already been undertaken. A championship event of this size and importance can involve up to 300 teams in the different classes and will attract hundreds of visitors as well as media from all over the country. They are eagerly awaited by the communities and will provide contacts for sponsors and opportunities for responsible education of the public on these dogs and these sports. The 2010 ESDRA Off-snow European Championships will be held in Italy in November 2010 and preparations are already well under way for this event.

The ESDRA and the IFSS are deeply worried about this Commission regulation of 6th May, which now requires all people, whether EU citizens or not, who wish to travel in the EU with more than five pet animals (non-commercial movement) to carry special health transport documents after official veterinary inspection and transmission. This new regulation will have a deadly impact on sled dog sports in Europe. Up to now, valid pet passports and correct microchip identification of the animals accompanying our sportsmen and women on their travels, for the purpose of recreational or competition activities or simply to visit family or friends, have been sufficient to allow them to enjoy full freedom of movement from one country to another. Moreover, the passport and identification have been incorporated into the ESDRA requirements for participation in competition.

The new travel regulations implemented by the Commission will definitely place a serious additional financial and administrative burden on pet owners participating in sled dog sports. It will be impossible to implement for people travelling every weekend or over several weekends, sometime in remote areas. The ESDRA fears that many participants will not be able to bear the extra costs that will certainly be required to obtain this official document every time they want to go to another country, and so will be forced to cease this sports activity, to their great distress.

Sled dog sports involve competition classes on-snow and off-snow for teams ranging from one to more than 15 dogs. Occasionally two countries may collaborate and hold a cross-border event, for example the "Grande Odyssée" stage race which is held in both France and Switzerland, the Alpentrail held in Austria and Italy, or the 2006 European championships in Italy and Slovenia. There are also many recreational club events with dog teams for those who enjoy the leisure side of the sport, and of course participants from neighbouring countries are welcome. Finally, with the growing interest in nature sports activities, there are dogsledding professionals, many of whom have national diplomas or other official recognition for this activity, who offer tourists sled dog rides or longer adventure trips in foreign countries where they transport their dogs and so both gain a reasonable income from this profession and provide highly-appreciated tourist activities for the communities and holiday resorts in which these professionals operate. Recreational sled dog training sites are also providing small mountain communities with extra income from the drivers who come for a weekend or longer to enjoy sledding or skijoring with their dogs.

Do please understand, Commissioner Dalli, that sled dogs are first and foremost beloved family companions and that this activity is a way of life, 365 days a year, for thousands of "mushers" throughout Europe. The vast majority of sled dog owners travel with sometimes many more than five dogs and only one or two people whenever they go somewhere to enjoy their sport. Therefore Commission Regulation N° 388/2010 of 6th May 2010 will have a dreadfully adverse effect on their lives. And it would also be the death of our beautiful sport in Europe.

But the ESDRA is also concerned that this regulation will negatively impact the lives and activities of other serious and responsible European citizens and pet owners who enjoy participation in dog shows, cat shows, field trials, gazehound trials, hunting activities, agility, and other competitions or leisure and family activities with their pets.

Millions of families throughout the European Union own at least one pet animal and many own several. Economically this represents a tremendous amount of business and employment in Europe and financial investment by Europeans who love and own pets. This economy regroups: the pet foods industry and its supply chain, veterinarians and the veterinary pharmaceutical sector, pet/kennel equipment producers, serious professional or amateur breeders - the latter being in the large majority, individual hobby fanciers participating in dog shows or sports events, professional show handlers, groomers, boarding facilities and pet-sitting, pet insurance firms, etc.

We have mentioned the additional income that local organisations and communities receive from hosting sled dog sports events but we would like to also provide the example of dog or cat shows. A "small" one-day show or a national club show will attract some 1500 entries or more and a large international championship

held over two to three days will attract well over 3000 or more entries per day. For example, the coming “World Dog Show”, organised by the Fédération Canine Internationale in Denmark June 24-27, has announced 19,354 dogs entered for the four days of competition: to wit, over 4800 dogs per day. Paid visitor entries can be phenomenal, and visitors also partake in the restoration facilities and buy from vendors’ stands at shows. Local hotels and restaurants will benefit from exhibitors and officials who stay overnight for the next day’s judging, while the kennel clubs will earn income that they can reinvest in the promotion of quality pets and the education of the public on responsible pet ownership. Cat shows also attract hundreds of entries and visitors and have the same positive effects.

For events of more than one day breeders or professional handlers may enter more than five dogs or cats as the classes are spread over the entire event, or if they are presenting a breeding group or group of hunting dogs. With the new regulation they will probably be chary of entering so many animals, or even cease participating altogether. This would have a domino effect on the incomes of the community businesses, on the clubs and organisers, on the Kennel Clubs and Feline Clubs, on the interest of the sponsors as fewer people enter their pets, and finally on the entire economy if there are fewer responsible breeders and show or sports-oriented pet owners who participate and spend their money. This will in turn lead to a decrease in the number of available quality pet animals and limit the opportunities for buyers to find healthy and well-socialized pets that are suited to their lifestyles – while still allowing “puppy and kitten mills” and other disreputable establishments to flourish.

But it is the “family” breeder (who represents the majority of pet breeders) or the non-breeder families with more than five pets who will feel the brunt of this regulation the most. These families invest considerable sums in raising their pets with the best care and feeding they can afford. With budgets already tight, these families may feel compelled to relinquish some of their pets; the “hobby” breeders, who nevertheless breed knowledgeably and with great passion for their breeds and offer high-quality, healthy and well-socialized animals, may be forced to cease their activities altogether. The same is true for those who enjoy sports activities with their dogs. The result would be more dogs and cats to re-home, and more placements in already-overcrowded shelters. The anguish of these owners and of the pets that may have to be re-homed or even placed in shelters will be incalculable.

Yet these are among the most serious and responsible pet owners with the best cared for and healthiest pets in the world.

Finally, the ESDRA respectfully draws the Commission’s attention to the fact that the official state veterinary services already have a very heavy workload with all the duties they must carry out, and that the current trend for national and regional governments is to streamline services, not to hire extra staff. Therefore the official veterinarians may simply not have the time or even the desire to examine pet animals in a sufficient time frame before travel. This in turn would not allow the owners to travel with their pets at all, or to have to find other solutions, which will include extra costs if boarding or pet sitting is involved. In the end, the results will be the same: owners will be discouraged and cease their activities, and some may feel compelled to part with their animals.

The ESDRA quite understands that the intention of Commission Regulation N° 388/2010 of 6th May 2010 is to try to prevent the fraud and trafficking in pet animals. We fully agree that this shameful traffic must be halted and we support all efficient efforts made to do so. For this reason we humbly point out to the Commission that we sincerely consider that this Commission decision of May 6th will do absolutely nothing to obtain any significant results in halting the traffic and fraud.

The responsible pet owners described in the previous paragraphs travel with **adult** animals which belong to them personally. They are not travelling for commercial reasons, but for personal ones. They are not committing any fraud and have nothing to hide; they travel via main roads, go through toll stations, have logos and stickers on their cars and vans that proudly announce their hobbies, and when inspected submit to the authorities’ questions openly and with great pride in their pets and their activities.

The vast minority who has been abusing the regulations by “fraudulently disguising commercial movements as non-commercial movements of pet animals” is dealing in puppies, kittens and young exotic pets. There is simply no market for adult dogs and cats, as breeders themselves will confirm. Buyers want young animals.

The ESDRA is entirely convinced that the people who commit these fraudulent acts will not be hindered in the least by the change in regulations. They will easily find or bribe accomplice veterinarians or officials to fill in the forms and carry out the procedures, or simply have the appropriate rubber stamps made and fill them in themselves and send the emails with falsified addresses. It is an openly-known fact that these criminals already fraud with falsified passports and microchips. The only way to stop this fraud is to severely control

and whenever needed to punish these individuals in their home countries, and severely punish, with exemplary fines, the individuals who acquire animals under fraudulent conditions in the destination countries. Many of these people are very well-known. Mme. Piquet Pellorce of the French SPA's Cellule Anti-traffic has even visited several "dog merchants" in their home countries; these puppy farmers speak rather freely of their practices and show absolutely no shame for their acts and activities, laughing at the documentary measures taken which they so easily get around. Another document will be no problem for them.

Until this May 6th, responsible and honest citizens have been proud to be able to travel freely throughout Europe with however many pets they may own and have respected the regulations in effect because they approved the "pet passport" scheme which facilitated this travel for them. They will now very probably feel that they are being classified as "potential criminals" since they will have to obtain a "commercial" type of health document to be able to take more than five pets with them on their travels, every time they leave the country. The document 92/65 E1 Animals from Holdings will be alien and incomprehensible to them. They will ask why they are being classified as "holdings" and want to know what a "holding" is. If a private individual travels to a family reunion with his 3 dogs and 3 cats and returns home with them, who is the "consignor?" Who is the "consignee?" In light of the current financial difficulties in some EU Member states, there is already open disapproval of "Europe" among the citizens, and pet owners make up very great number of those citizens. Implementing this regulation will cause them to feel distrust for our European institutions and to consider that the European Union is unduly interfering in their private lives.

Commissioner Dalli, please be assured that the ESDRA realizes that the European Commission had no intention of creating potentially difficult situations for reputable pet owners and breeders or for sports organisations. But we also truly believe that these very pet owners and related sports activities will be the most, and the most negatively, impacted by the May 6th decision, and that the individuals who are actually targeted by the change in regulations will not be affected.

For all of the above reasons, and on behalf of the millions of respectable and responsible pet owners in Europe, the ESDRA very respectfully asks the European Commission to please reconsider and rescind this decision of May 6th and to return to the original text which exempted pet owners from this administrative procedure under the "non-commercial movement" clause.

We sincerely feel that such an action would be in the best interests of honest pet owners and their pets, and that other, more effective solutions can be found to prevent the type of fraud the May 6th decision intended to curtail. To this end, the ESDRA would very much like to meet with you, and to invite other representatives of the pet fancy to do so, in order to bring forward our concerns and needs, and to try to find just and equitable solutions to allow law-abiding European pet owners to continue to fully enjoy all of the freedoms that the European Union offers them.