



Brussels, 19 March 2008
D(2008) 2467

Opinion

Title **Impact Assessment on: Review of regulation on non-commercial movement of pets**

(draft version of 20 February 2008)

Lead DG **DG SANCO**

1) Impact Assessment Board Opinion

(A) Context

The Regulation on the animal health requirements applicable to the non-commercial movement of pet animals allows certain Member States to retain a transitional period of 5 years for pre-movement testing for detection of neutralising rabies-antibodies, tick and tapeworm treatments. According to the Regulation, the Commission should send a report to the European Parliament and the Council before 1 February 2007 with proposals about the regime to be applied after the end of the transitional period, i.e. 3 July 2008. The report has been delayed because collecting the scientific assessment has taken longer than envisaged. The transitional period will in any case need to be prolonged with one or two years as a result of this delay.

(B) Positive aspects

The IA report is well-written and generally provides a proportionate and balanced analysis with good use of qualitative and quantitative indicators.

(C) Main recommendations for improvements

The recommendations below are listed in order of descending importance. Some more technical comments have been transmitted directly to the author DG and are expected to be incorporated in the final version of the impact assessment report.

General recommendation: This IA report would benefit from some improvements to the table comparing the options, a clarification on the situation between the UK and Ireland, and a better explanation of the situation in the Baltic States. It should also be presented more concisely. DG SANCO agreed to make changes along these lines

and announced it would resubmit a revised IA report.

(1) Refine the overview table comparing the options. The table summarising and comparing the impacts of the options should differentiate between relevant groups of countries (EU22, EU5, UK/IRL, listed third countries, unlisted third countries) as the scores are not expected to be the same for each group. The current scoring of the impact on veterinarians and serology laboratories should be reviewed, based on the definition of a clear baseline to which the scores for the various options should be compared.

(2) Clarify the issue of pet movements between the UK and Ireland. The IA report should clarify how the situation of pet movements between the UK and Ireland is included in the baseline, and whether this initiative is proposing a change of legislation and/or enforcement and how this relates to the assumptions about the baseline.

(3) Better qualify the rabies situation in the Baltic States. The remark in the IA report that the rabies situation in the Baltic States is not significantly worse than in other Member States should be further qualified, for instance by comparing it to what the rabies situation in the other Member States was at the time when the current regulation was adopted. Also the recent improvements in the treatment of rabies should be referred to as needed to qualify the remaining threat level from the Baltic States.

(D) Procedure and presentation

The IA report should more closely respect the recommended maximum length of 30 pages (excl. annexes) by removing repetitions and overlaps.

2) IAB scrutiny process

Reference number	2008/SANCO/010 (Catalogue initiative)
Author DG	SANCO-D-1
External expertise used	No
Date of Board Meeting	17 March 2008
Date of adoption of Opinion	19 March 2008