



**Dr. Karin Schwabenbauer**  
Head of Directorate, „Animal health, animal welfare“  
- CVO -

To  
Dr. Milan Malena  
Director General  
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MY REFERENCE

DATE 03/06/2014

Dear Colleague, dear Mr. Malena,

I would like to come back to the issues related to the commercial movement of dogs which remained unsolved at our meeting on 16 March this year.

If dogs are moved to Germany from other Member States as a result of trade, they need to comply with the requirements of Articles 5 and 16 of Regulation (EC) No. 998/2003 pursuant to Article 10 (2) of Directive 92/65/EEC. Among other things, this also includes a valid vaccination against rabies. According to Annex Ib point c of Regulation EC No. 998/2003 a rabies vaccination is considered valid if at least 21 days have elapsed since the completion of the vaccination protocol required by the manufacturer for the primary vaccination. Almost all rabies vaccine manufacturers recommend a minimum age of 12 weeks for the primary vaccination. If one adds the 21 day waiting period, animals can only be moved for trade purposes once they are around four months old. The official veterinarian certifies the presence of protection against rabies in the health certificate according to Annex E of the mentioned Directive. Therefore the ban you mentioned to trade animals under the age of 3 months indirectly results from what I stated above and not from an expressly formulated ban.

Concerning your enquiry regarding the conditions for the movement of dogs, cats and ferrets under the age of 3 months from the Czech Republic to Germany I would like to inform you that these animals may only be moved to Germany from other Member States without a valid vaccination against rabies pursuant to para 13 (5) of the Ordinance on Disease Control in the Internal Market if they fall under the definition of "pet animals" of Article 3 a of Regulation (EC) No. 998/2003. This implies that the moved animals must not be intended to be sold or transferred to another owner. The pups shall either be accompanied by their mothers, or they

shall be accompanied by a written certification stating that the animals have only stayed in the place in which they were born without contact with wild animals.

Regarding your question to what extent Germany sanctions the transport of pups which are under 3 months old and unvaccinated if the transport is intended for a Member State or a third country in which trade with these animals is permitted I need to refer to the competence of the German Länder for monitoring the compliance with national and Community veterinary legislation. In this respect, a uniform national approach must be agreed with the Länder. I will address this at the next meeting of the corresponding working group in October 2014. Irrespective of this, such movements are only possible in compliance with the provisions of Directive 92/65/EEC using a certificate pursuant to Annex E to this Directive and a TRACES notification.

I will forward your comments regarding delays in transmission and incomplete descriptions of the facts in cases of interceptions to the competent Länder authorities.

Yours sincerely,  
For the Federal Ministry

signed: Dr. Karin Schwabenbauer