

Environment, Food and Rural Affairs Committee

Oral evidence: Pet smuggling, HC 926

Tuesday 24 November 2020

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[Watch the meeting](#)

Members present: Neil Parish (Chair); Ian Byrne; Geraint Davies; Dave Doogan; Rosie Duffield; Dr Neil Hudson; Mrs Sheryll Murray.

Questions 1- 60

Witnesses

I: Paula Boyden, Veterinary Director, Dogs Trust; Dr Jennifer Maher, University of South Wales; Daniella Dos Santos, Senior Vice President, British Veterinary Association.

II: Lord Goldsmith of Richmond Park, Minister for the Pacific and the Environment, FCDO & Defra; Marc Casale, Head of Animal Welfare, Defra.

Written evidence from witnesses:

- [South Wales University](#)
- [The British Veterinary Association and The British Small Animal Veterinary Association](#)
- [Defra](#)

Examination of witnesses

Witnesses: Paula Boyden, Dr Jennifer Maher and Daniella Dos Santos.

Q1 **Chair:** Welcome to our evidence session on pet smuggling. It is a delight to have some excellent witnesses here today, and it is good to continue our inquiries into pet smuggling. Can I ask our witnesses to introduce themselves?

Paula Boyden: My name is Paula Boyden. I am the veterinary director at Dogs Trust, the UK's largest dog welfare charity.

Daniella Dos Santos: My name is Daniella Dos Santos. I am the senior vice president of the British Veterinary Association, the largest representative body for vets in the UK, representing over 18,000 members. I am also a small-animal vet in practice.

Dr Maher: Good afternoon. I am a senior lecturer at the Centre for Criminology at the University of South Wales. My expertise in research is on animal abuse and environmental crime, in particular the illegal trades in pets, involving illegal wildlife trade and puppy smuggling. In 2018, I completed a study for the Scottish Government and Defra on the illegal puppy trade. I publish widely on this particular topic.

Q2 **Chair:** Thank you very much. It is very good to have you all here this afternoon for our inquiry. What are your estimates of the scale of pet smuggling into the UK at this present moment? How has that changed, especially over the pandemic?

Paula Boyden: In terms of the scale of the problem, it is very difficult to put an accurate figure on it. Just going back to some basic information that we know, we have about 9 million dogs in the UK. If you take the average age of a dog to be 12 years, we need about 750,000 dogs per year to maintain that population. It is not that supply must equal demand, but supply will equal demand.

During the current pandemic, we know that there has been a significant increase in individuals buying dogs. This is perhaps because they are now working from home and they feel that their lifestyle is such that they can accommodate dogs into their lives. A couple of things have happened as a result of that. The average cost for a lot of dogs has skyrocketed. Some information that we have had from a group called Tech4Pets has indicated that prices for some of the popular breeds, such as pugs, chows, dachshunds and French bulldogs have gone up in the region of 70%.

In terms of illegal importation, we know that dogs coming into the UK, or more specifically Great Britain, under the pet travel scheme decreased significantly during lockdown, as we would expect, because of the restrictions placed on to human movement. However, the numbers of what we call ITAHCs, which are health certificates issued for commercial movement, really have skyrocketed. We would normally expect that the month in which most imports would come into the UK would be around October, which would tie in with the Christmas market. However, May was

just a little below October last year. Since then, the numbers have continued to increase.

Basically, we have seen a marked increase in commercial imports coming into the UK. One of the really worrying things about that is that, normally with these commercial imports, there is no requirement to check the shipment at the port. They should stay at their point of destination for 48 hours post import. Normally, APHA undertakes a number of checks, but that is down at less than 10%. We know that during lockdown there were no post-import checks. There is real worry as to the numbers, scope and scale of puppies coming into Great Britain.

Chair: You are saying that there were actually no checks during that period in the first Covid outbreak.

Paula Boyden: There were no checks in the early part of lockdown because of Covid restrictions. Even in peacetime, if you will forgive the terminology, those checks are down at less than 10%. There is a worry as to the illegal activity that could be associated with that.

Q3 **Chair:** Danielle, can I bring you in now and ask you a linked question? Do we know how many puppies we breed in this country? There is a big gap to fill, is there not? That almost makes the smuggling worse.

Daniella Dos Santos: I do not have those numbers to hand. We can certainly try to get hold of them. I would just like to support Paula's comments. Certainly over the Covid pandemic, we have anecdotally in practice seen a huge rise in the number of puppies and kittens coming in to see us, where people have been home longer and have felt that perhaps this is the right time to get a dog.

Covid aside, this is a larger problem. You have alluded to the issue that there is a demand in this country. As Paula has already mentioned, if there is a demand, the supply will meet it; whether or not it should is a different conversation. There need to be wider discussions about how we meet that demand with healthy, well-socialised puppies that have had a good start in life and will stand a better chance going forward.

There are various aspects to that. We need to look at things like licensing regulations, but we have to be careful not to fall into the trap that big is bad and small is good. We need to look at this in a holistic manner and look at all the welfare needs that we need to address in these puppies.

Q4 **Chair:** What are you finding in veterinary practices? Are you finding, across the country, quite a lot of puppies coming in that have not been properly socialised? What is the anecdotal evidence of the number of puppies that have come in from abroad, and perhaps some of those not in a good state?

Daniella Dos Santos: We do not have the numbers. The closest numbers we are going to get are what Paula has spoken about. I can say that, in practice, about three in 10 companion animal vets surveyed in 2018 were concerned that they had seen puppies that had been brought in illegally. That is quite a number if you think about it. There are various reasons why their suspicions were raised. Almost three-quarters said their suspicions were raised by the client's explanation of where the puppy was sourced or

came from. About 44% were told that the puppy was brought in from abroad, but they found on their examination that the puppy was actually too young to have been legally imported. Also, just over a quarter found that the puppy's age did not correspond to the paperwork in front of them. There is generally a concern among the veterinary profession that they find it very difficult to know what to do when they encounter these puppies that they are concerned have been brought in illegally. We have developed some flow chart guidance to help vets with that.

Dr Maher: When I carried out my study for the Scottish Government and Defra, with colleagues Tanya Wyatt and Paul Biddle from Northumbria University, one of our key aims was to try to identify the scale of the trade. Our findings echo what Paula and Daniella are saying. It is possible to identify the legal and illegal puppy trades in the UK.

If it is helpful, I would like to comment on the issues with data, why we cannot give accurate estimates or data on this and the different types of trade that we identified. For example, we identified three types of trade. In terms of our national trade, there was legal, unregulated trade. This is where people are breeding a certain number of litters under the number needed for regulation, or accidentally breeding dogs and selling and exchanging them. There is no data available on the prevalence of this part of the trade.

We then have the legal, regulated trade, which is covered by various pieces of legislation on breeding, selling, welfare and so on and so forth. There is some data on different aspects of this trade in terms of local authorities keeping licensing and complaints databases. HMRC obviously has tax information on businesses. There are Kennel Club registrations that indicate the legitimate breeders there. Microchip and insurance companies have information. Of course, NGOs keep some information on various aspects of the trade.

However, our research did find that there is a buoyant illegal trade in terms of puppy farms, unregistered breeders and unregistered third-party sellers online. Some of the data available to give us an estimate of this was available from trading standards, fraud complaints and NGO investigations. There were limited prosecutions. Importantly, we looked at online advertisements. Just looking at Scotland alone for a 12-week period, we estimated that the value of the trade was around £13 million. If you looked at that in terms of that scale for the whole of the UK, you are probably talking about £130 million for that period of time alone, in terms of the value of the trade to these people who are selling.

The data available is not always easy to access. It is not easily collated for analysis either. Unfortunately, in terms of problems with the data that is available, there are often not enough resources to check unregistered premises because some of these premises are completely covert; there is no registration identified. Also, online with advertisements, we found that a lot of them did not have licensing numbers or microchipping information. Again, there was very little enforcement of this online. With the introduction of something like Lucy's law, we are hoping that traceability and these kinds of issues will be resolved.

Q5 **Chair:** Is that in the next question?

Dr Maher: Yes, I will come to that. Just one of the points in relation to the illegal trade was about the involvement of organised crime within our national trade. Internationally, there is obviously the regulated trade. There is no legal unregulated trade because all aspects of bringing a dog into the UK are regulated. You then have the illegal trade of dogs that are coming in under other legislation but in non-compliance or completely covertly. Commercial imports are recorded, but not all the dogs coming into the UK are registered as being commercial, so under "pets". This is commonly a problem.

Q6 **Chair:** We will park that there because we are going to move on to the question on smuggling. Daniella, how have the vets found the microchipping in puppies? How accurate is it, or is it not? That has always been an issue for us.

Daniella Dos Santos: Microchipping is very beneficial and is part of responsible pet ownership, but there are significant issues with the current microchipping system. We have numerous databases that will not necessarily communicate with each other. You may end up with one dog registered on various different databases with different owners. We also have the issue of owners not keeping their details up to date, so then you run into issues in terms of reunification. Also, we are talking about imported dogs. We also have dogs with foreign microchips that enter the UK and then are not registered on a database in the UK, which means reunification is very difficult.

Chair: Thank you for that. We need to tighten up on the databases and the system.

Q7 **Dr Hudson:** Thank you to our witnesses for being here today. I should quickly declare an interest: I am a veterinary surgeon, so I have a key interest in this.

I have a follow-up to what Daniella and Paula said about anecdotal feeling for what has happened during the pandemic, in terms of what is happening out there in veterinary practice. We are going to get on to control mechanisms and rules and regulations for animals moving into the country in later questions, but are you picking up among your membership, and out in rescue centres, any increase in dogs that have come in with exotic diseases such as leishmaniasis and tick-borne diseases? Are you picking that up in the practice setting or in the shelters with dogs coming in from overseas?

Daniella Dos Santos: It is really difficult to specifically link anything we are seeing at this stage with the pandemic. It is possibly too early for some of those diseases. Do we see a link with endemic diseases in other countries coming into the UK in imported dogs? Yes, absolutely. They pose not only a risk to the individual dog, but a risk to the UK dog population. In certain situations, they pose a real public health risk as well, because we are talking about zoonotic diseases.

Q8 **Dr Hudson:** It is too early to say with the pandemic, but prior to it, in veterinary practice, people were picking it up. Paula, have you got anything

quickly to add to that?

Paula Boyden: The other thing I would add is that, since the end of 2015, Dogs Trust has been working with Defra on a puppy pilot. We have basically underwritten the quarantine costs to allow APHA, the folks down at the ports, to seize illegally imported puppies. As a matter of course, we screen any dog that comes into our care that has either originated from or travelled overseas for these non-endemic diseases. Even with puppies, in which you would perhaps not expect to start seeing titres, we are starting to see evidence of disease there.

Q9 **Mrs Murray:** I should declare an interest: I am the chair of the All-Party Parliamentary Group on Cats. I am also a mad cat owner of Milly and little Louis.

I would like to turn to Lucy's law, which we saw introduced in 2020, and the Petfished campaign. Are Lucy's law and the Petfished campaign enough to successfully tackle pet smuggling?

Paula Boyden: Lucy's law only came into effect at the beginning of April this year, so it may be a little early to draw too many conclusions. There are a couple of things we can learn from Lucy's law specifically. Lucy's law only applies to commercial activity. One thing we have seen during the pandemic, and certainly in the years that we have been working on puppy smuggling, is how quickly and easily the illegal importers adapt to changes. Like I said, at the beginning of the lockdown, the trade shifted from the pet travel scheme over to commercial imports and the Balai Directive. Bearing that in mind, it is really important that, if changes are implemented, they apply to both commercial and non-commercial movement. We have to be aware of the law of unintended consequences.

There are a couple of other things that we just need to bear in mind. One is that, with Lucy's law, there is no statutory obligation to prohibit the sale of a puppy or kitten that has been bred outside of England. That is a huge worry, and hopefully that is something that is within the gift of these discussions and can be addressed moving forward.

The other one that I believe Daniella mentioned is that we need total traceability. We do not have that at the moment. Although you have to be licensed if you breed three or more litters, there is zero traceability with fewer than three litters. What we would really like to see, and what would really enhance this, would be those for those who are breeding and selling fewer than three litters to be registered with the objective that that registration or licensing number would be a mandatory part of any advertisement, so that you have that traceability.

If I might just touch on the Petfished campaign, it is great to see Defra taking this forward. It is a huge challenge in that we know that buying a puppy, or indeed a kitten, is an emotional purchase. It is always going to be quite difficult. I have seen the early indicators of the most recent Petfished pulse, and it is great to see that. We need to continue to try and effect that human behaviour change. That is what we are trying to do, but we know from our own work that over 30% of people do not really think a lot about getting a puppy. A lot of people will go and take their puppy away

the day they see it; they perhaps do not always see the value in seeing the puppy with its mum. It is a great start and we are really supportive of it. That is something that we need to continue to work on collectively.

Q10 **Mrs Murray:** Has the pandemic contributed to that, for example with puppies and other young pets not being seen with their parents because of social distancing and other restrictions?

Paula Boyden: That is certainly what we have heard anecdotally. It is one of the excuses used by the individuals who are illegally importing these puppies. One other thing I would say is that they are very clever. For example, we know that they will rent a house in a nice part of town and pass a puppy off as UK-bred. We know that pandemic restrictions have been an excuse for this.

The other thing I would say, just going back to the puppy pilot, is that, particularly since the start of the pandemic, we have seen an increase in heavily pregnant mums being brought in. It is illegal; it has always been illegal to transport a pregnant mum in the last 10% of her pregnancy. For those ones, it means that they can be seized and we can provide the appropriate level of care.

Equally, there have been some pregnant mums seized that have not quite got to the last 10% of their pregnancy, and we have to hand them back to the importers. It is devastating for our teams to know that they are going back into horrible conditions.

Dr Maher: In relation to whether Lucy's law or Petfished are working, the problem is the measurement of what is working. How can we ensure that we know something is working? What is the measuring stick that we are using? There are a number of things we can look at, but before we can talk about success, we have to be clear about how we are measuring these. For example, anecdotally we are seeing more prosecutions and more complaints. That could be proof that it is working, but we would obviously not like to see that down the road. That is one of the things to focus on. How will we know if these things are working? This is important to know where we should put the resources going forward.

In terms of Lucy's law, one of the biggest issues we saw in our study was third-party sales online essentially facilitating the illegal trade. What Lucy's law is doing is a really good start, but for it to work we need to see robust registration and enforcement to ensure compliance. We need to ensure it is not standalone; this is not going to solve the problem on its own. As Paula already pointed out, this idea of being able to trade internationally and then not be under the remit of Lucy's law is very problematic. Essentially, that would mean that we were not going to stop the international puppy trade.

One of the other things to point to is also that we need a UK-wide approach. We need a European-wide approach, but at least a UK-wide approach would be a good start. It would be great to see Lucy's law coming into effect in Wales, Scotland and Northern Ireland, to provide complete coverage.

Q11 **Mrs Murray:** Daniella, perhaps you would like to come in on this next question. Are those who are involved in pet smuggling individuals, organised crime gangs or both?

Daniella Dos Santos: I am not sure that I am the best person to answer that specific question. By the time we, as vets, see them, quite often the puppies are already with their new owners, so we miss that. Just to reiterate Jennifer and Paula's comments, registration is really important. We would absolutely support the registration aspect of this.

Dr Maher: It is impossible at this point to say exactly how much of the trade is organised and who exactly is involved—whether it is organised crime groups, criminal networks or just trade becoming more organised. I can say for sure that, both across Europe and in the UK, enforcement agents, NGOs and other people who are looking at this issue absolutely see this as being an organised trade. The difficulty is in saying what exactly is happening when we talk about "organised". Under the UN and Europol criteria for organised crime, we can see that the scale of the puppy trade is significant. They are very fluid, as Paula already pointed out, in terms of how they can respond when responses are put in place by officials, but also in terms of the different players. We know there are people involved in legitimate business. We know there are people who are involved in criminality, whether that is tax evasion or more serious types of criminality. We also know that it is of an international nature.

All those factors together mean that it is an organised trade. We can also point to the fact that, because it is high profit and low risk, it is very attractive to organised criminals. Even if they are not involved in it now at a very high level, if the trade continues in the way that it is, it is essentially a very attractive option. It is susceptible to the involvement of organised crime groups.

Paula Boyden: Just to add to Jennifer's comments, she mentioned that this is high profit and low risk. To put that into context, if you are caught illegally importing a puppy—the chances of that are low, because we know that the checks at the ports are not fit for purpose and there is not 24/7 coverage at the ports—the maximum sentence you would get would be three months' imprisonment. Compare that, for example, to smuggling cigarettes, where the maximum sentence is seven years inside. There are going to be some very unscrupulous individuals.

The other comment I would make from the puppy pilot perspective is that we are starting to see an increase in breeds that one might associate with illegal activity, such as cane corsos and American bulldogs. I do not have any definitive evidence for you, but anecdotally it would certainly be a big concern.

Chair: Paula, it also means that we need to get this five-year sentencing in as soon as possible. I think we would all agree on that this afternoon.

Q12 **Dave Doogan:** What additional measures can the Government take to tackle puppy smuggling?

Paula Boyden: It is within the gift of Government at the moment to introduce tougher penalties to make this a deterrent and actually have appropriate checks at the ports. We are not seeing those at the moment. Moving past the end of the year, irrespective of where you sit on the EU exit debate, suddenly this really does become within our grasp. This legislation that is currently EU legislation becomes UK legislation. We would really like to see an increase in the minimum age of entry into the UK. The three-week wait post vaccination that is in place at the moment is purely to allow the vaccine to stimulate the immune system. It bears no resemblance to the incubation of disease at all.

We would ideally like to see a reintroduction of the rabies titre test. Particularly with puppies, we know that they are least likely to respond to rabies vaccination. We know that because of the 12 years of serology we had leading up to the changes in 2012. We would also like to see an appropriate wait that ties in with the incubation of disease, which would be a 12-week wait post that successful blood test. They are the really key ones that we would like to see with this.

Daniella Dos Santos: Just to add to Paula's comments, we would absolutely support the extension of the wait time post rabies vaccination to 12 weeks. There are various reasons for that. We have touched on the incubation period, but it would also effectively mean that puppies were outside of the desirable age for sale; that would automatically impact on demand.

The other aspect here is to look at the number of animals that can come in per consignment. At the moment under the pet travel scheme, one person can bring in five dogs. If you have multiple people in a van or a car, you can bring in five, 10 or 15 dogs. We would want to see that reduced to five per consignment.

Q13 **Dave Doogan:** If there was one thing that any of our witnesses could recommend that the Government implement in terms of the hierarchy of solutions to this problem, what would that be?

Daniella Dos Santos: From the BVA's perspective, if I had to choose one, it would be the 12 weeks rabies post-vaccine wait time.

Paula Boyden: Yes, I would agree with that.

Q14 **Chair:** Daniella, are you saying then that the puppy should be five or six months old at that stage? You can age the puppy or dog better then, can you not? Is that so?

Daniella Dos Santos: Yes, absolutely. You are looking at about 24 weeks of age, which means for us as vets that ageing the smaller-breed puppies, in particular, would be much easier, to ensure compliance. The market demand for them at that age is also significantly less than when you are talking about 10 or 12 weeks.

Q15 **Chair:** They are not so cute then, are they? People will really have to want a dog rather than just a cute puppy. Without wanting to lead you too much as a witness, would it not in some ways be better all round if dogs were older before people had them?

Daniella Dos Santos: There are benefits to delaying impulse purchases and encouraging a more thought-out purchase. As Paula has touched on, purchasing a puppy is an emotional purchase. The wait time would allow people to think it through more thoroughly.

Q16 **Dave Doogan:** Say, for example, some unsuspecting family were to purchase an illegally imported puppy in Brechin in Scotland, in Bangor in Wales or in Birmingham in England, what intelligence do we have about where that puppy would likely have entered the UK?

Dr Maher: The fact is that, once a dog comes into the UK, there is no traceability. We do not know where they start from and we often do not know where they are going to end up. Usually, when people identify a problem and they bring their puppy to a vet, or the like, the puppy will have a microchip. If it is an international microchip, that is one indicator that the puppy has come from outside of the UK. Short of that, there is not much that will help us to identify where that puppy has come from.

Likewise, consumers who are in that situation often do not know what to do with that information. They do not necessarily know how to make a complaint, they do not know which authorities they should be contacting to make them aware of the problem, and so on and so forth. Unfortunately, when families find themselves in that position, we often do not have the information on where the dogs come from. That information is often not passed on to the authorities because people do not necessarily know who they should contact and how to do so.

This is one of the recommendations that we had from our study in terms of making sure that consumers were aware of what they would need to do if they were faced with that problem. As a result, the Scottish Government put in place a website that was a one-stop shop for consumers to help inform their decisions going forward when they were in that position.

Q17 **Dave Doogan:** Let us take the homes out of it. In your broader professional and academic understanding of this situation, where would be the busy ports in the UK for puppy smuggling?

Dr Maher: We know that the trade is mostly coming from eastern European countries and Ireland. More recently, anecdotal evidence is suggesting that it is coming from Russia. Essentially, you are seeing that, from Ireland, the puppies are either being moved up through Northern Ireland and then legitimately across to the UK, or the ports in Dublin and Rosslare are key locations for coming in. We identified in Operation Delphin that once enforcement has taken place in one of those ports, they will know to move on to another. They are very flexible in terms of which ports they will use.

From mainland Europe, you are talking about them coming up through the south; they come up through England and then will move forward into Scotland, Wales or wherever they need to go. We know that the puppy trade is coming from all those angles. To reach Scotland, they are coming from Ireland, Northern Ireland, mainland Europe, all the way through England, and so on and so forth. Of course, we know that there are puppy farms in places like Wales. Wales is, unfortunately, well known for its puppy

farms. We know that the trade would be coming from Wales and going up to Scotland.

One of the interesting aspects of our research was that consumers were, first, very happy to go far and wide to collect the right puppy, and, secondly, willing to pay not the cheapest price; they were not necessarily looking for the cheapest puppies. In a sense, that facilitates the fact that the trade can come from all these various places and will be facilitated all the way through the UK.

Paula Boyden: Just to touch on the microchipping side of things, if we had a longer wish list, one of the things that would be incredibly helpful would be to log the microchip numbers of imports as they came into the country. At the moment, there is a requirement to scan but not to log those numbers. That would certainly start to give us the indication of where they were coming in. We know that, for example, in England, Dover and Folkestone are the key ports. With my vet's hat on, if we did have an outbreak of disease, it would start to give us a level of risk in terms of a particular animal. If we are talking about rabies, most cases will present between three and eight or three and 12 weeks post infection, so a dog that came in six weeks ago is going to be of much higher risk than one that came in six months ago. There is a dual benefit to that. It does not have to break GDPR; it just literally needs to be the microchip number, the date it came in and which port it came through.

Q18 **Rosie Duffield:** A lot of this has been covered by what Sheryll asked you, but I have probably had more emails on puppy smuggling from my constituents than almost any other single issue, including things like Brexit and domestic violence. My constituents are really concerned about this vile practice and how to end it. I just want to know if the experts on the panel think that all the measures that are being taken, with my friend Marc working on Lucy's law and, in particular, with the sentencing increase, are exactly what we as MPs need to be able to reassure the public that there will be change. In particular, Jenny, will the sentencing deter these criminal gangs that you mentioned as well?

Dr Maher: Your question there links nicely to the point I also wanted to make with regard to what more we can do in terms of dealing with the trade. What Paula and Daniella have pointed to will definitely address certain aspects of the illegal trade, but where the trade is completely covert, those measures will not work unless we really tackle the enforcement aspect. A key development in the UK has to be ensuring that both the training and the resources are in place for enforcement agencies. That is necessary both internally—across the various local authorities—and at the borders.

Increasing punishments for offenders can be helpful, especially because there is a whole range of different players who are involved in the trade. For legitimate business, they may see that as more problematic and therefore not want to engage. We know in our criminal justice system that the certainty and severity of punishment is what is important. We are missing the certainty element. We can go with severity, but if we do not

have certainty as well, which can only happen through robust enforcement, we will unfortunately not deter people from engaging in the illegal trade.

Paula Boyden: Just to add to that, we mentioned earlier on that, if there are changes to the legislation, as is absolutely necessary, it needs to cover both the commercial and the non-commercial travel; otherwise, the trade will just bat from one to the other. We have to think of the unintended consequences of that.

We have undertaken four investigations since 2014 and we have found vets in Lithuania, for example, offering to sedate puppies so that they are not declared at all. We had a group of 10 French bulldog puppies come in to us; it must have been about two years ago now. They were just hidden under the seat in a car. There was also a time when a female was originally thought to be the mum, but it transpired that she was effectively a stooge; there was no evidence of any milk and she was not indicating that she was the mum of those pups.

These are the sorts of things that we are going to face. Jennifer is absolutely right in terms of enforcement, but part of that means having the appropriate resource at the ports. We already know, with the system we have at the moment, that there is not total cover at the ports. The importers are very good at adapting, they are very good at communicating with each other, and therefore they know the "right times" to come into the country when they are not going to be challenged. Unfortunately, it is not one size fits all; it is going to have to be a number of measures to try to tackle this.

Q19 **Dr Hudson:** Before I get into the details of my question, which is going to be talking about movement of animals, controls, rules and things like that, I just wanted to explore something. Paula, you have brought up a couple of times the reality of heavily pregnant dogs being brought in. It would be very useful to get on the public record, Paula and Daniella, what your take on that situation is. Through the pandemic—but you would also have more data from prior to the pandemic—how common is it that heavily pregnant dogs are being brought in?

Some of the breeds that you have talked about, the popular breeds such as bulldogs, are the sort of dogs that actually might end up needing caesarean sections. Some of these dogs are being smuggled in. Are you picking up evidence that they are having caesareans in this country and then those dogs are going back and forth in this cruel way? As you said, Paula, it is very hard to ascertain whether a dog is in the last 10% of its pregnancy. Do you have any thoughts on the situation, as well as any recommendations to Government as to how we can close that really cruel loophole?

Paula Boyden: In terms of pregnant mums, the first time we encountered this was back in 2017. The reason I mentioned that is that the law in the UK is that a breeding bitch should only have one litter in any 12-month period. One of those mums still had the skin stitches in from what we think was a previous caesarean section from the previous season. The indications were that she had been bred from successive seasons and she had clearly had at least one caesarean section.

The other concern we mentioned when we spoke about Lucy's law was about there not being a statutory requirement for prohibition of a dog being bred outside of the UK. This obviously addresses that from an illegal importer's perspective. One thing that we have heard anecdotally is pregnant mums, as you alluded to, just being recycled. They are being bred in central and eastern Europe and brought over to the UK to whelp, their puppies are sold off as UK-bred, and then they go back and the whole cycle starts again.

Interestingly, the importers were not worried about the puppies that I mentioned to you that were smuggled in because they were hidden under the seat of a car with a mum of the same breed, but they absolutely wanted her back. That certainly suggested to us that they wanted her because she was valuable breeding stock for them. What we perhaps need in our own domestic legislation—as you know, the licensing regs came in in 2018—is a requirement that a breeder cannot register or sell more litters than the number of breeding bitches they have, to try to avoid this recycling.

Q20 Dr Hudson: Can I just explore this a little bit further and perhaps go over to Daniella? Daniella, you mentioned early on that vets in practice are sometimes faced with very difficult and stressful situations, where they have an animal in distress and are having to deliver veterinary care. Daniella, is your membership picking up evidence of dogs that potentially have been brought in recently, are then being presented for difficult whelping and are then ultimately needing caesareans, for some of these breeds? It is very difficult for the vets to prove or disprove that these animals have come from unscrupulous sources, so it is a very difficult situation. Are you picking up evidence from distressed vets in practice saying, "I have had to do a caesarean on a dog that I am really worried about, which might have come through this smuggling network"?

Daniella Dos Santos: It is really difficult to be able to link directly. We know, when we have surveyed our members, that over 50% of the dogs that they see that they suspect have been illegally imported are French bulldogs. They are breeds that are predisposed to requiring a caesarean section. I am not sure whether I can say to you that we have seen a link in terms of illegal imports needing caesarean sections. Could I say that we are seeing illegal imports, or suspected illegal imports, being brought in with a wide range of health and welfare issues? Yes, absolutely. In terms of infectious diseases, behaviour issues and zoonotic diseases, we are seeing the consequences of these dogs coming in, absolutely.

Q21 Dr Hudson: I will get back to my question now, but these are really important points to draw out. Paula has highlighted the fact that we have some ports where we have worries that we do not have sufficient inspections of animals coming in. These pregnant animals and puppies are still going to slip through the net, so we as a Committee can say to Government, "Can we look at that for animal welfare reasons? Can we pick up that these animals are being smuggled through?"

That brings me on to my question. I will start with Jenny on this one. As we come to the end of the transitional arrangements for leaving the EU, what are the implications for pet travel between Great Britain and the EU, but also between GB and Northern Ireland? Jenny, you have described

some of the different pathways through which animals can come into the United Kingdom and move within the United Kingdom. What do you see as the implications of the end of the transitional arrangements?

Dr Maher: That is a big question. There are a lot of possible problems but also great opportunities in terms of some of the things that have been pointed to already. With the pet travel scheme, we have a great opportunity to make that much more robust, to take out some of the loopholes that are clearly being exploited by people who want to engage in the illegal trade. The border between Ireland and Northern Ireland is obviously a difficult one because we know that the trade is coming up through there and then coming across to the UK. There are probably better people than me who are in the process of trying to figure that one out.

With regard to the commercial trade, one of the big developments across Europe that will come into force soon—the EU animal health law—will bring in much better, much more robust traceability, which is essential to cracking the illegal trade. It will be problematic if the UK stands outside these developments in and across Europe. Likewise, I know that the EU is bringing in a Digital Services Act, which again is about dealing with making the online advertisements and that aspect of the trade much more robust. There are opportunities in the UK to look at what is happening across Europe and ensure that we are engaging with them in a way where we are not standing outside but are part of the solution, making the enforcement and the systems in place much more robust.

Daniella Dos Santos: It is safe to say that we as a veterinary profession have no clarity yet, particularly when it comes to the Republic of Ireland, Northern Ireland and GB, as to how movement will look there. We would ask for urgent clarity on that so that we can advise even just our clients who do regular travel with their pets as to what to expect.

I would actually highlight that the end of transition brings a real opportunity here not only to prevent or work towards preventing puppy smuggling, but also to protect the UK dog population health and public health in the UK. We have already touched on the extension of the wait time post rabies vaccine, in terms of the demand for puppies, because they will be out of that age range.

There are other opportunities here. For example, tapeworm treatment is vital to protecting not only animal health but also public health, because there is a particular type of tapeworm that is zoonotic and can prove fatal in people. At the moment, the window for treatment is between 24 and 120 hours before travel, and it is only for dogs. We need to extend that to cats as well. We need to shorten the window to 24 to 48 hours. At the moment, a dog can go from the south of England to France for the weekend and back again, having been treated here, picking up the tapeworm in France and bringing it back. The danger with that from a public health perspective is that the incubation period is five to 15 years. By the time we know we have that tapeworm in this country, it is too late. There is an opportunity there.

There is also an opportunity to reintroduce compulsory tick treatment. Again, ticks bring in zoonotic vector-borne diseases. We have seen cases

of babesiosis in Essex that we believe originated from a dog that had travelled. We have cases in animals that did not travel. They again can be zoonotic, infect people and cause serious harm. The end of transition is a real opportunity for us to protect the UK dog health population and public health and prevent the illegal smuggling of puppies.

Dr Hudson: Thank you, Daniella. That is very helpful. Normally in these sessions, members steal questions from each other, but Daniella, you have pre-empted the second part of my question perfectly. I was going to talk about the opportunities for the United Kingdom to change the rules for the better for the animal population in this country but, as you have said, indirectly for human health as well, by introducing some of the tapeworm treatments and mandatory tick treatment. Chair, you will be relieved that Daniella has saved us a lot of time by asking and answering her own question.

Q22 **Chair:** There is another part of the question, though, which is about the Balai Directive, where you can bring in as many puppies as you like commercially. That surely needs to be tightened up tremendously, does it not? What is your view on that, Daniella?

Daniella Dos Santos: There is an opportunity here to tighten up on all aspects of importation. As my fellow witnesses have already alluded to, the issue is enforcement. It is all fine to have these regulations in place, but if they are not being enforced and the checks are not being carried out, then it is a very low-risk mode of transportation for people who are involved in puppy smuggling.

Q23 **Dr Hudson:** One of the things that we have questioned Defra, Ministers, and the Secretary of State about is veterinary capacity as we come through transition. Do we have the veterinary workforce in place? We were focusing on the food supply chain, but it is very pertinent to movements of animals across borders as well. We have already highlighted in this session that we have some alarm bells ringing about some of the ports where we are not able to enforce these rules, and we can potentially improve that from January onwards. What do we need to recommend to Government in terms of veterinary needs, but also animal inspection officers, potentially welfare officers—people who will be able to detect issues from consignments and vehicles coming into our ports? What recommendations could we make to Government?

Daniella Dos Santos: I would leave it to my fellow witnesses to talk about enforcement. If we are talking specifically about small-animal veterinary surgeons in practice that are dealing with the day-to-day paperwork of the pet travel scheme and so on, we really need clarity as soon as possible as to what that will look like come the end of transition. At the moment, because we do not know, we are advising our clients that they have a four-month preparation period for it. There are small-animal vets in practice who are OVs and are capable of doing this work. We do not have clarity as to what that work looks like. That would be the first stage for us, but I would defer to my fellow witnesses around the enforcement aspect.

Paula Boyden: I do not disagree with limiting the numbers coming in under the Balai Directive, but we have to think of the unintended

consequences. We should look at reducing the limit of five for individuals coming in. There was a paper published by Murray et al back in 2010 that indicated that over 96% of dog owners in the UK own one, two or three dogs. We have certainly seen over the years that, when this illegal activity started back in 2012, importers were bringing in five dogs at a time. We highlighted then that this was not normal activity and the numbers dropped to twos and threes.

Perhaps this is as a result of the pandemic and the profits to be made, but I was speaking with a transporter this morning and he witnessed a situation at the port just a couple of weeks ago with five Polish individuals and 25 puppies of desirable breeds across three vehicles. They were all going in to declare that they owned five puppies each, so we are back to that situation again. It is just a reflection of how quickly they will adapt, but also of some of the simple things that we can do to try to start to limit this activity.

Q24 Dr Hudson: Jenny, do you want to add anything? What do we need to recommend to Government? What do we need at the ports that we do not have currently? Do we have enough vets? Do we have enough inspection officers? Could that potentially be provided in writing later on? It would be useful to know if we have had alarm bells ringing that the animals are coming in with welfare situations that we are not detecting. It is all well and good having rules, but if you do not know what is going on, those rules are meaningless.

Dr Maher: There are probably two points to this. One goes right back to what I was initially talking about in terms of understanding the scale of the trade. It is hard to know what resources are needed in the ports without understanding the scale of the trade and how the trade is very flexible to what is going on around the world, like Covid for example, and how quickly they are able to respond to that. Understanding the scale of the trade is very important.

Enforcement is absolutely one of the biggest issues. There is not enough training and, again, the resources are not in place. That is at the borders but also internally across the UK, in terms of the various agencies out there. Of course, during Covid, these agencies have come under increased pressure. Therefore, we really need to look at increased resources. When you bring in something like Lucy's law, you are again asking these agencies to become better at the job they are doing, to inspect further, do more inspections and so on and so forth. It cannot happen if they do not have the resource to do that. That has always been my concern. No matter what we do in terms of legislation, programmes, or policies that we put in place, if we do not support the people who are meant to inspect and identify where people are not being compliant, they are not going to be effective.

Q25 Geraint Davies: We have already heard from the witnesses that there is a massive increase in the number of people who want pet dogs because of coronavirus. We know that people have less money to look after those dogs. They might find problems with affording the insurance with vets, and so on, and so we might see more abandonment. In addition, as we move into January, there will be massive pressure from the end of the transition period on the ports. I am thinking particularly, from a Welsh point of view,

of Holyhead, and Northern Ireland. A lot more dogs might get in and end up ultimately abandoned. We need more support for charities and local authorities.

I was wondering whether anyone would like to give a comment about the stress and strain on charities, and whether Government should do much more, as well as trying to tighten up the ports, as we have already discussed, as we move into January. Assuming we cannot, what should charities be doing and getting from Government?

Paula Boyden: It is a real worry. We know that the number of stray dogs went up by about 30% in the subsequent three years after the 2008 recession. We have certainly estimated that there may well be around 40,000 dogs that might end up being relinquished as a result of the situation we are in at the moment. That is a real worry. Put that against the backdrop that charity fundraising has been significantly hit and we are looking at a hole of approximately £15 million this year. Legacies have been impacted because of the decreases in property prices and investment. Our reserves have been hit as well.

The Association of Dogs and Cats Homes undertook a survey of its members in the early part of lockdown. A number of those members do not have significant reserves. That is not a criticism of the situation they are in, but there is a real worry that some organisations may not survive this. We are potentially in a situation where we may have greater relinquishment and fewer organisations to actually be able to address that.

We know colleagues in PDSA have already taken the really difficult decision to suspend their preventative treatments because of the overwhelming demand on their services. The number of people looking to see whether they can get PDSA support has gone up by nearly 60%. Calls to their hospitals have gone up by around 80%. They are bursting at the seams.

Should Government look to provide extra support? Yes, absolutely, and particularly for those smaller organisations. ADCH has been able to offer some grants to some smaller organisations to give them a bit of support, but it is a real worry moving forward.

Q26 **Geraint Davies:** In a nutshell, my understanding is that over half the charities have less than half the income, and yet they are seeing much more demand from people who cannot afford to keep the dogs that they have got as a result of Covid, as it were. They want companionship but then cannot afford them. Should the Government make up that shortfall?

Paula Boyden: Government should certainly look to see where they can help with these situations. One other thing that we have highlighted—with my vet's hat on, but it is certainly part of the charity key effects—is that there is concern about veterinary fees. This is not battering my own profession by saying that they are too expensive, but whenever one is choosing a treatment option, for me in my world, the gold standard is providing the best care you can with the resources you have. That includes the cost. We need to think about that in what we would call pragmatic case management. There are going to be a range of treatment options, but we have to find the most appropriate one to try to keep pets with their owners.

Q27 **Geraint Davies:** Danielle, are you seeing a lot more people coming forward who have basically got a new dog, partly because of coronavirus and the companionship thing, cannot afford it and are asking for advice: "I cannot afford insurance; where can I go?" and then that is passed on and ultimately some of the dogs may end up abandoned? What is your experience?

Daniella Dos Santos: Our experience is that, anecdotally, there has been an increase in the number of puppies, kittens and dogs that people are getting during the pandemic, because they have found themselves at home and thought this would be a perfect opportunity, and actually the financial impact this is having across society means that some are now facing the fact that they cannot actually financially afford the cost of having a pet.

Going back to what Paula was saying and your direct question about whether Government should offer support, if Government are going to offer support, it should be timely and fully accessible to these charities that are involved. Also, I just want to remind people, off the back of what Paula has just said, that yes, vets fees do cost and there is no NHS for vets, but every time you have a conversation with a vet, it is a two-way conversation to discuss what is right for you and your pet in that particular circumstance, with whatever the financial situation is. I would urge people to, please, continue a dialogue with their vet so that we can try to come up with a suitable solution and ensure that, if the Government are to offer support, it is timely and accessible by those who need it.

Q28 **Geraint Davies:** Finally, Jennifer, have you any experience that suggests that people are basically buying more and more pets to keep them company, because of coronavirus, lockdown and the like, but they cannot afford it and we are ending up with abandonment? We may end up with even more dogs being illegally transported at the end of the transition period, because of the stress and strain on the ports. We may end up with more and more abandoned and abused dogs from people who cannot afford to look after them. Is that right, Jennifer?

Dr Maher: The evidence, anecdotal and otherwise, during the period of Covid is that, yes, if we look at online advertisements, if we look at imports, there has been the production of more dogs. Consumers seem to want to buy more dogs, so inevitably we are going to see a lot of new dogs going to households. Our study for the Scottish Government and Defra identified that even very well-meaning and responsible consumers can still get caught up in buying dogs irresponsibly and not necessarily understanding the consequences of their actions in terms of the dog's long-term health needs and also their behavioural needs.

My concern, which I can see from my personal engagement with dog rescue, is that every time there is a change in the trend of fashionable dogs, within a couple of years rescues start to see those dogs coming through. You almost have a year or so delay before you start seeing them coming into rescue, but because that pattern is in place, that is absolutely what is happening. People will buy dogs and realise for various reasons that they cannot keep them. What that points to is that in the UK we have always been heavily reliant on charities to deal with the mess that we

create in terms of problematic dogs; by that I mean that we find them a problem, either in the home or in terms of in society.

In terms of what needs to be done going forward, absolutely, charities are going to have to be supported because they do a lot of the clean-up in terms of dealing with dogs that have behavioural problems and dogs that have health issues. I have no doubt we will be seeing a lot more of those. Of course, it is in our best interests because we want to prevent dog bites and so on and so forth, and that could be a consequence of the situation we find ourselves in.

Another point is that local authorities will only hold on to dogs or are only responsible for holding on to dogs for seven days, essentially, before euthanising them or handing them over to charities, although different areas have different things in place. If that aspect could be looked at, if we are going to see an increase in abandoned dogs, then that will take a little bit of pressure off charities. Charities are always interested in trying to step in before the dog is euthanised, and having to do that puts a lot of pressure on them, financially and otherwise. We need to make sure there is funding for the agencies that are going to have to address potential problems down the road and then make sure that there is funding and support for charities as well to deal with potential problems down the road.

Q29 **Geraint Davies:** In other words, if people are given dogs for Christmas, a lot of them will end up being put down.

Dr Maher: Potentially, yes, because local authorities only have to hold on to those dogs for a limited period of time. They only have funding to hold on to them for a limited period of time. At the end of that period of time, if a charity does not step in, if they do not have an arrangement already in place with a charity to take those dogs over or if they do not have a facility in place themselves, then those dogs will be euthanised. I do not have the exact numbers now, but they are easy enough to find; I had them in one of my previous reports. We are still euthanising thousands of dogs in this country.

Q30 **Geraint Davies:** How many are being killed?

Dr Maher: Thousands. These are healthy dogs; I am not talking about those who are being euthanised because of ill health or otherwise.

Q31 **Chair:** I am sorry to interrupt, Jenny, but if you could give us any of the numbers in writing, it would be useful.

Dr Maher: I will dig them up, yes.

Chair: Paula, Daniella and Jenny, can I thank you for an excellent evidence session? This Committee is very strongly committed to stopping as much puppy smuggling as possible and making sure animals are treated as well as possible. The evidence you have given this afternoon is really important to us. We are now going to be following you with Zac Goldsmith and Marc Casale from Defra, and we will drill down on this. We very much appreciate what you have said. We will try to put together a good report, and the evidence that you have given us this afternoon will be extremely useful. Thank you very much, all three of you, for some great evidence this

afternoon.