



Environment, Food and Rural Affairs Committee

Oral evidence: Moving animals across borders, HC 79

Tuesday 18 May 2021

Ordered by the House of Commons to be published on 18 May 2021.

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

Questions 54-123

Witnesses

I: Ross Hamilton, Head of Public Affairs, British Horseracing Authority; Roly Owers, Chief Executive, World Horse Welfare; and Jan Rogers, Director of Research and Policy, The Horse Trust.

II: David Bowles, Head of Public Affairs and Campaigns, RSPCA; Paula Boyden BVetMed MRCVS, Veterinary Director, Dogs Trust; and Maggie Roberts, Director of Veterinary Services, Cats Protection.

Written evidence from witnesses:

- [British Horseracing Authority](#)
- [RSPCA](#)
- [Dogs Trust](#)
- [Cats Trust](#)



Examination of witnesses

Witnesses: Ross Hamilton, Roly Owers and Jan Rogers.

Q54 Chair: Welcome to this EFRA Committee session, dealing with animal welfare and the movement of animals across borders. We are dealing this afternoon with horses and, more generally, dogs, cats and pets crossing our borders as well. Welcome, everybody. Our first panel is made up of Ross Hamilton, Roly Owers and Jan Rogers. Jan, if you would like to introduce yourself—ladies first—and then we will get Roly and Ross to do the same.

Jan Rogers: Thank you; that is very kind of you, Chair. I am Jan Rogers. I am employed by the Horse Trust and I am a member of the British Horse Council, alongside Roly Owers. I am giving evidence today from the British Horse Council on the basis of the work we have been carrying out supporting the challenges that have arisen during the first quarter of this year, plus my experience as an employee of British Equestrian, where I was actively involved with the movements of horses for sport and breeding, plus the movement of germinal products and also the administration of the former tripartite agreement. BHC has collated information from across the sector since transition end. We have been actively involved in Government liaison and engaging with our contacts on the continent to find solutions.

Chair: Thank you very much, Jan. Shall we have Roly, then, please?

Roly Owers: Thank you, Chair. I am Roly Owers, chief executive of World Horse Welfare, and I am, as Jan said, also on the British Horse Council. I am giving evidence today from that background, but also from my involvement with the Equine Disease Coalition—which has very good engagement with the Government veterinary teams in Scotland, Wales, Northern Ireland and England—and the European Horse Network, which has good engagement across the European continent equestrian sector.

Chair: Thank you very much, Roly. Ross, please.

Ross Hamilton: Good afternoon, Chair. My name is Ross Hamilton, I am the head of public affairs at the British Horseracing Authority, the governing and regulatory body for thoroughbred horse racing in England, Scotland and Wales. My role is leading on Government engagement and liaison, as well as policy development—one of those areas has, of course, been in relation to the UK's withdrawal from the European Union—and the implementation of the animal health law, and animal welfare more generally.

I am a member of the Thoroughbred Industries Brexit Steering Group, which has been leading on the industry's preparations for the UK's withdrawal from the EU, monitoring the impact of it on our industry, working proactively with our colleagues, particularly in France and Ireland,



on solutions to some of the difficulties we are facing, and taking advantage of some of the opportunities that may arise in the months ahead.

Q55 Chair: Thank you very much, Ross. In a way, your introduction leads very neatly into my first question, which is about these new animal health rules since we have left the European Union. How is the horse world, particularly equestrian and racing horses, coping in the brave new world? I will bring you in first, Ross, and then come back to Jan and Roly.

Ross Hamilton: First of all, it is very difficult to completely disaggregate the impact of covid and Brexit on thoroughbred movement during the last few months. That has been quite a challenge, but there are some clear signs and statistics that give an idea of the scale of movement we were engaging with in the thoroughbred industry beforehand, under the pre-existing tripartite agreement that had been in place since the 1960s. This covered both thoroughbred and sport horse movement between Great Britain, France and Ireland. There were some 26,000 thoroughbred movements annually between those three countries, and about 80% of those movements were taking place predominantly for breeding purposes. In the thoroughbred industry, this has to be via natural means.

In terms of quantification of the impacts we have seen, overall, British runners in EU countries are down 51% for the first four months of this year, compared with the equivalent period in 2019, and runners from the EU in Great Britain are down around 40%. Non-racing movements—for breeding purposes—from Great Britain to the EU are down about 59%, and movements into Great Britain from the EU are down about 65%. So, there are quite significant reductions.

Of course, that coincides with lockdowns in many of those jurisdictions in 2021, so it would be difficult to disaggregate. What is clear at the moment is that, at least in the short term, there has been an increase in the paperwork and administration required to move thoroughbreds. That is proving more difficult for some of the smaller operations in the industry. Our advice as a steering group was to seek the advice of a professional shipper or transporter in undertaking movements, given the lateness with which the trading co-operation agreement was agreed, and that advice has largely been followed. That is an idea of some of the early quantification of movements we have seen in the thoroughbred sector.

Q56 Chair: I imagine that for thoroughbred breeding, there are quite a lot of stallions in particular and mares, I imagine, moved for breeding purposes. It must be quite seriously affecting the potential for breeding thoroughbred horses across Europe and Britain, mustn't it?

Ross Hamilton: Yes. As one example, we would have around 5,000 broodmare movements in the average covering season coming across to stallions based in Great Britain or, indeed, for moving to stallions based in other countries. Given the importance of the breeding industry to the British rural economy—it is worth more than £400 million a year to the British economy—it is critical for us that there are mechanisms in place



HOUSE OF COMMONS

that allow that movement to take place, recognising the high animal health and welfare standards that are mandatory in our industry.

Q57 Chair: This is a blunt question, but is it possible to bring stallions in or move mares across for breeding, or is it so bureaucratic at the moment that it has just stopped? What is the situation?

Ross Hamilton: It is possible, and I think that, as the months have moved on since January and February, more of the operations are getting used to the additional procedures and protocols that are in place, and that has been encouraging. There are a number of very international, professional operations at the top end of thoroughbred breeding. However, we are conscious that there may be more of an impact on smaller breeding operations, particularly for movements between Britain and Ireland. That is a key part of the nexus of thoroughbred racing and breeding in this country, given our share of horses that are bred in Ireland and then come over to race in Great Britain. Anything that damages that ecosystem could be quite significantly challenging for our industry—not just, I would add, in Great Britain, but very much also for our colleagues in Ireland and France as well. It is not a zero-sum game.

Q58 Chair: Absolutely. Can I bring Jan in now, and then Roly? As far as horse welfare is concerned, what is the situation out there like?

Jan Rogers: Thank you very much, Chair. We can report in relation to the sport sector and other horses for sales and for recreational, which are very small numbers. The figures are about a third—so, 33%—of what they would have been in the first few months of the year. So, it has had a significant effect.

On the plus side, as mentioned by Ross, we advised people not to move in the early months of the year, so, specifically in January, people tended not to. In February, they began to move because they took the advice not to move in January to mean that it would be okay in February. When they started to move in February, that did not prove to be the case, understandably, so there was some consternation. There were a number of challenges, and UK shippers did a really good job in supporting the community through the increased complexities surrounding the production of the export health certificates, the new customs arrangements and the challenges in processing those movements through border control posts on the continent. On one level, people listened and it was good, and then on another level, those challenges then became apparent a little bit later in the year.

I think you specifically asked about the animal health law. Horses for competition, racing and cultural events would have benefitted from a derogation, but the effect of the export health certificates for the animal health law has now been put back to August, so that is beneficial. It has allowed the other aspects of this to bed in effectively.

You also asked about movements for breeding, which does not impact the sport sector quite as much as it does the thoroughbred sector. Most breedings are carried out through movement of germinal products and it is

equally important that we support those movements, because that is a vibrant industry. It provides a contribution to our economy and, going forward, in terms of developing the British-bred sport horse for sale and for international markets, it is important that impediments are not put in place of the movement of those germinal products.

Chair: Okay, thank you. Roly, please.

Roly Owers: Thank you, Chair. I know we are going to come on to talk about illegal movement shortly, so just keeping it more general to start with and picking up on the animal health law, there are some very positive developments within the animal health law, not least the registration of premises. However, clearly, transport is a stressful experience for all horses and, therefore, it is a huge concern that there are these significant delays building up at Calais, especially. The fact that those have been happening in the cold winter months is one issue. If the delays continue into the summer months, it will have a significantly increased impact on equine welfare, which is obviously something that we are extremely concerned about.

There is also an issue around the infrastructure and the resourcing of border control posts, because at the moment the enforcement checks are completely paper-based. Actually, the equine is not getting a look in at all. On these high health movements, as Ross and Jan have already talked about, there should be differentiation, so that the focus can be far more on intelligence-led enforcement rather than the paper chase that is currently going on.

Q59 **Chair:** If you are moving a horse now, once you have actually done the paperwork, however complicated that might be, you can largely move it, can you? If you are moving it across to Calais, do you face an awful lot of stops and checks, like we were seeing with seafood and meat exports? What is the situation?

Roly Owers: The others will come in on this, but the critical issue is capacity at the moment. The border control post at Calais is open only between 8 and 6. They are reputedly saying that they can do 10 horses per half hour, but it rarely achieves that. When you get up to proper numbers over the summer, the system will become very quickly gridlocked.

Chair: Okay. Thank you for that; that is very clear. Let's move on to Dave Doogan.

Q60 **Dave Doogan:** Many thanks, Chair. Can I ask the witnesses to update the Committee on what they anticipate happening if the rules and requirements for the movement of horses between the UK and the EU stay the same? What are the longer-term implications, both for horse racing and for equestrianism? If possible, could our witnesses separate those projected consequences into the effect that they might have on the more amateur end of horse ownership versus the more professional, commercial side?



Ross Hamilton: Certainly from the perspective of the thoroughbred industry, what we are absolutely keen to do is treat this not just as a trade issue for ourselves in horse racing. We are a £4 billion industry in the UK and are worth £300 million to the Scottish economy. We are keen also to treat this very much as a welfare matter, too, because as Roly was touching on, there are potentially critical welfare implications if delays continue during the warmer summer months—just to build on the point that Roly was making about the border control posts.

The majority of movements during the summer months would ideally take place overnight in lower temperatures and with less traffic. The fact that those are going to have to be moved during the daytime, in the hotter hours of the day, could have consequences for horse welfare, which is absolutely the last thing that anyone working in the thoroughbred industry or the wider equine sector would like to see.

In terms of the wider economic consequences, we in British racing are certainly conscious that we are at the pinnacle of a very competitive international industry. If we are not able to compete internationally because of additional requirements that are put in place for our participants to compete abroad and that are not reciprocated by the UK Government, it could set British racing at a competitive disadvantage. Because there were systems that worked extremely well for many decades and that can be replicated again under the provisions of the trade and co-operation agreement, we hope that that could be reflected in future changes under the new SPS committee that has been formed. But the value to the British economy that we are talking about is hundreds of millions of pounds if this cannot be resolved in the medium to long term.

Roly Owers: I would reiterate that, from the perspective of welfare, there are significant concerns if changes are not made. As Ross has just said, this is an area where there is a virtuous circle of equine health, equine welfare and the economic interest of the sector. They can potentially support each other through improved systems, one of which I know we will come on to: the digital equine ID and traceability system. But there are some fundamental pieces of the jigsaw that need to be put in place to make sure that it does not do damage to the equine sector and also do significant damage to equine health and welfare at the same time.

Q61 **Dave Doogan:** Roly, can you identify a significant gap between the more commercial end of this enterprise and the more small-scale type of operation?

Roly Owers: I think we are going to come to it in a second. There is obviously the movement of elite sport horses—race and sport horses—and we certainly support that sort of high health differentiation. But at the other end of the market, much of it is under the radar, which we will come to talk about in a second. In reality, when we look at the leisure sector, there is not much compliant movement of animals across to mainland Europe. That is not quite the same as between Great Britain and Northern Ireland, but it certainly is the case with the rest of the EU.



HOUSE OF COMMONS

Jan Rogers: I can add a little more. Probably the biggest increase will be in costs. In order to process the additional documentation, to service the requirements at the border control posts, and to engage official veterinarians to complete the certificates for the movement, cost increases are at least double in every case. That impacts on the professional end and, indeed, on the amateur competitor as well. It can be as much as 300%, depending on when you travel and the route by which you travel—the route you are taking and where you are going, effectively. We have instances of it being as much as 300%, which makes it prohibitive.

The challenge, then, is that there is friction. When there is friction, people find alternative solutions, and that could mean moving horses by alternative routes, which could be longer and could involve longer sea crossings. We have anecdotal evidence that that is the case. We haven't got hard figures, because hard figures are not available for those sorts of movements, but it is none the less a concern for the welfare of the horse that people take a less frictionful solution—if that is the correct word—in order to achieve their aim.

Roly has already mentioned the capacity at border control posts, and it does in fact transpire that they are not able to process the numbers that were projected. The streamlining of movements through border control posts is being looked at, and we are in contact, through international competitors, with the chief executive and president of the port of Calais, who has some ambitious plans to improve the transit through the port, including moving areas of inspection closer together so that they can be done in a one-stop shop, rather than having to transit between one and the other. Those changes will bed down and are really important. What is also important is that they are hearing the concerns we have surrounding the smoothness of the transit and the wellbeing of the horses.

It will have an impact on events in this country. This was specified by a number of people at the National Equine Forum this year, whereby events and shows are the backbone of our equestrian environment. Many competitors come from overseas, and the people who attend those shows and events go to see those international competitors participate. There are a lot of challenges with getting them here and getting them back, not least the increase in costs and the challenge around getting the volumes back in the timeframes that have been outlined by Ross. They would normally want to take night boats and to go back at specific times.

The doglegs and the challenges that is going to create in terms of volumes wanting to move at one particular time are quite off-putting and a real challenge for big shows and events. I am authorised to mention the Windsor Horse Show, because that is one of the biggest events and it is coming up in July.

They have a real concern about the increase in costs and in volumes that will have to be returned immediately after. In a minute, we will get on to ways of improving that, because every issue has a proposed solution. The solutions for this, which are supported both by colleagues on the continent and by the UK industry, are digital solutions.



Q62 Dave Doogan: Just two points of clarity from Jan. If I understand you correctly, it is a case of potentially travelling through the day rather than the night, and potentially taking a longer overland journey or making a longer sea crossing to facilitate a more expedient port of entry. Is that right?

Jan Rogers: Yes. We are hearing anecdotally that those challenges are already presenting themselves, but in the specific case study that I mentioned of that particular horse show, at the end of the event up to 200 horses leave the showground at once and they would normally take the night boat back to the continent. The sheer volume, plus the holiday traffic, plus the seasonality, gives shippers cause for real concern about how they can manage that mass transit of horses back to the continent, returning on those boats.

Q63 Dave Doogan: And the increase in costs, of a factor of between 1% and 300%—Are you hopeful that these will be resolved anytime soon and be mitigated to what they were previously, or similar?

Jan Rogers: If you want to see the full extent of the costs, British Equestrian did a cost comparison document that is published on their website and explains how they are broken down. When you look at that breakdown, you can understand that some of them will have to remain but some of them, which surround the complexity of the production of the export health certificate, could easily be reduced, if a digital solution could be brought about.

Dave Doogan: We have heard a lot about that in other witness sessions. Thank you very much indeed.

Q64 Mrs Murray: Jan, you have alluded to this; you obviously anticipated my question. What changes could be made by the UK Government to improve the movement of horses between Great Britain, Northern Ireland and the EU? I know you said we would come on to that, but I am asking you to come on to it now, please.

Jan Rogers: Thank you very much for the lead-in. If there were one word I could ask people to consider, it would be the development of “digital” systems. Just before we left the EU, before the end of the transition period, EHCo—Export Health Certificates Online—was launched. That effectively, to all intents and purposes, has a digital front end, but I mean “digital.” What is ultimately produced out of the back end is an export health certificate that is pages and pages long.

In practice, that certificate has to be completed by an official veterinarian in draft and then in final form, and possibly in another version in the middle, to be sent across to the border control post before the horse can move. Each paper has to be completed by hand. If the disease is not appropriate, each irrelevant page has to be struck off in a certain way. That takes an awful lot of time on the part of the official veterinarian.

That document is then received by the shipper. It has to be scanned down to 2 megabytes and transmitted across to the border control post so that



HOUSE OF COMMONS

that movement process can begin and that horse can have an authorisation to move and to board the ferry. So what looks like a digital system is not a digital system.

What we are talking about is a real digital system. At the moment, you will know that we have what's known as the central equine database. That is where all the data records for equidae in the UK with a passport are kept. It is a fully digital system. There are challenges with data quality in it, but that is a whole other thing.

Before we close, I want to bring to your attention the importance of considering the movement matters in conjunction with equine identification matters, because the two are inseparable. Fundamentally, if we have an accurate base data record for a horse, which is digital, that information can then, through application programming interfaces, be transferred through to certificate and customs systems. That means less keying in, less opportunity for error and speedier production. Therefore, we can expedite those processes massively without having to recreate new systems but by using the data that we already hold in the central equine database, which the Government have already procured and is superb.

Q65 Mrs Murray: My second question is how well have the Government worked with the EU to ensure that the movement of horses can continue?

Jan Rogers: Is that still to me, Sheryll?

Mrs Murray: To all of you. I am sorry, I should have said, if the other witnesses have anything to add to what Jan said, then please do so. I am sorry to have left you out.

Roly Owers: I am happy to jump in. Two things off the back of what Jan has said. In terms of what the Government could do, they could certainly consider looking at a common veterinary area between Great Britain, Northern Ireland and the EU. I think that would help protect equine health and welfare, but also really add oil to the wheels of equine movements between the UK and the EU.

Q66 Mrs Murray: You say, "what the Government could do". Of course, that means that the EU would agree to that. Have you had any indication in any of your meetings with the EU or with people in other European countries that there would be agreement about this?

Roly Owers: The EU Commission Vice-President has gone on record saying they would certainly consider that. The indications are positive. It would be a fertile option to follow up with. I know that there is wide-scale agreement, certainly from the equine sector, on the establishment of a common veterinary area, but it relies on a digitised equine identification system.

The other area is around border control posts. At the moment, the focus is around Dover, but when we move forward and Great Britain starts inspecting animals coming into the country from next March, it is really important to have a good geographical spread of border control posts. By that, I mean on the east of the country for Harwich and Hull, because



hopefully Rotterdam will get a border control post approved soon and significant trade goes along that route. Obviously, in the south, in addition to Dover, there is Portsmouth; in the west of the country in Wales, there is Holyhead, Pembroke or Fishguard; and obviously there is Cairnryan in Scotland. So it is really important to have a properly infrastructured and resourced system of border control posts, because that is going to be key, potentially along with a common veterinary area, to really help smooth equine movements and focus enforcement, which we will come on to in a second.

Mrs Murray: Ross, do you have anything to add to that?

Ross Hamilton: Yes, I do. On those two questions, certainly, we completely agree with the views that Jan expressed about the challenges that the current paper-based systems are causing. Really, there are solutions available. In the thoroughbred sector, we already have, through Weatherbys, which acts as the general studbook for not only Britain but Ireland, an e-passport system that is capable of acting as a lifetime digital document for a thoroughbred, encompassing identification, vaccination, medical records, movement and ownership information. Much of that, in fact, has been put in place by the industry partly as a response to covid, because we were taking paper records away because transferring paper was potentially an issue when we restarted racing just under a year ago after our lockdown. There is lots of potential there in terms of working with DEFRA to make sure that the industry, like thoroughbred racing and like other sport horses at the elite end, have systems in place so that if they can speak to both UK and EU systems, that will help facilitate that movement or even enable pre-clearance of some description to help move those horses through.

More generally, in terms of our engagement with Government and how well they are engaged with the EU, we have been in regular contact with DEFRA, as many of us have been, over the last five years since the referendum, on the challenges that might be created as a result of withdrawal from the EU. Most of them we were able to anticipate and to come up with measures to try to mitigate some of those initial challenges. Now, under the new mechanisms in place through the trade and co-operation agreement, which I mentioned earlier, it is important that the Government continue to engage with industries like ours, as they have throughout, on the solutions that we have available, which are principally digital. That builds on the high health and welfare status that is fundamental to elite horse sport in Great Britain and is certainly the commitment of the thoroughbred racing industry going forward. We want to be engaged in that.

That ambition is shared on the part of thoroughbred horse racing by our counterparts in Ireland and France. We have been engaged in a taskforce that has put in representations at a European level as well, to outline how these systems can operate for the benefit of EU countries and the UK beyond our withdrawal from the EU.

Q67 **Dr Hudson:** Thank you to our witnesses for being with us today. First, I



HOUSE OF COMMONS

will declare some interests in this area and refer people to my declaration of interests. I am a veterinary surgeon and a member of the British Equine Veterinary Association. I have very close links with the Horse Trust through research links and the British Horseracing Authority, with active consultations. I wanted to declare that.

This is the quick-fire supplementary round. I want to follow up on the comments about the tripartite agreement between the UK, France and Ireland, which now does not exist. Do the panellists feel optimistic that something to replace it can be put in place, along similar lines or even wider? Yes, we are in a transitional phase, we want digitisation and we want to lubricate things, but do you feel that we can get a tripartite mark 2?

I do not know who wants to go first. Jan, it looks like you unmuted first, the quickest on the draw.

Jan Rogers: Did I win the unmute race? Yes, I am happy to contribute. The concept of the high health horse status is defined by the OIE. It is an international concept and widely understood. Where the digital systems that Ross and I were talking about exist and you can evidence horses' health status and trace their movements from their point of origin, from the premises where they originate to the venue that they have attended, you can monitor their in-contacts and return journeys. That concept of a high health horse, to expedite those movements, to support the challenges that are currently being felt, is certainly of interest to the UK and in conversation with sporting bodies across the world likewise. It requires developing and having systems in place to underpin it. It could therefore be a logical replacement for the tripartite agreement, which operated so effectively from '65, as Ross said, and certainly without any issues since it was renegotiated and began again in 2014.

Q68 **Dr Hudson:** It is in everyone's interest, so the UK would be up for it. Do all of you feel that France and Ireland want something similar? Also, within Europe, what about other member states? Can it be a tripartite plus, to add additional members, or do those three original members want it to exist as it does?

Jan Rogers: I will let Ross jump in but, before he does, the concept of just a tripartite need not exist; it could and should be expanded out to be a high health horse arrangement with wider scope.

Ross Hamilton: Absolutely, we are not necessarily looking for a closed shop. The point we would make is that it would be people raising their standards to reach that limit, rather than lowering the standards to let other countries in and so on, so high health is the absolute principle at the heart of this. In respect of the specific nature of the tripartite agreement, it is worth noting that the tripartite agreement predated both the UK's and Ireland's accession to the European Community, so there is precedence for it to exist outside the EU structures.

We certainly continue to undertake engagement as part of the taskforce that I referred to earlier. That has Irish and French representation; it has



HOUSE OF COMMONS

thoroughbred and sport horse representation on it. Certainly, in the discussions that we have been having in the thoroughbred sector, our counterparts in France and Ireland are absolutely pushing their own Governments and the European Commission, which are ultimately the competent authorities here. Ultimately, it is going to be a European Commission decision, but I think the representations continue to be very strong, certainly from the French and Irish racing industries to their Governments, and we are making the same representations to DEFRA, and so far, encouragingly, we are hearing a positive response to that, but we need to carry on with it over the coming months under the mechanisms now in place, through the trade and co-operation agreement.

Q69 Dr Hudson: That is really helpful, thank you. Roly, I am going to ask about disease in a second, but do you want to add anything to that?

Roly Owers: We would fully support that. Digital traceability clearly underpins that, and it would not work without it. Anything that can be done to streamline compliant equine movements so that the intelligence and focus can be put on non-compliant equine movements is to be broadly welcomed.

Dr Hudson: Chair, will you indulge me a bit, to keep going with a couple of quickfire supplementaries?

Chair: As always, Neil, I can indulge you.

Q70 Dr Hudson: Jan, you talked about the increased costs and paperwork. I think it would be useful for our inquiry to get on the record any instances in this transitional phase of difficulties and complexities for horse owners, potentially at the higher end with breeding animals, with mares with foals at foot. If we could get on the record what your membership and stakeholders are reporting about issues moving mares with foals at foot around for breeding and the complexities, the costs, the logistics and, potentially, some health and welfare implications of that. Is there anything you could get on the record for us?

Jan Rogers: I might have to pass the mares with foals at foot to Ross, since that has principally been a thoroughbred matter to date. I can certainly give you some instances of welfare challenges for sport horses, which have moved principally by ferry from Dover to Calais during the early part of the year where, depending on the day of arrival and the number of other vehicles that arrive at the same time, they have been waiting for up to nine hours. That is an exceptional case, but it is not unusual for horses to wait between the three and seven-hour timeframe to be processed. That would mean to arrive at the port, to get through the veterinary checks, and to get through the customs checks. Those processes are not exactly streamlined yet, but we do have assurances from the chief executive and president that they are being looked at and that these matters are being taken very seriously.

There have been some serious welfare concerns about horses standing on lorries for very long periods and then having to proceed with the journey to their ultimate destination, which, in this case, was for a show-jumping



HOUSE OF COMMONS

tour in southern Spain, so as you can imagine, that is a very long journey. For mares with foals at foot, I am afraid I do not have any data for you.

Ross Hamilton: I do not have any data to hand, Neil, but I will endeavour to get some more on that for you.

Dr Hudson: Any reports of any adverse situations on that side of things would help. If there is anything on which you could follow up in writing, that would be very helpful for us.

Roly Owers: Very quickly, there has been one very highly publicised case in Belfast of four ponies being kept for a whole month because of the residency requirement on the paperwork not being appropriately declared. That went to court and eventually the judge overruled the Government and allowed them out. That is just one example of real issues with certification and paperwork not being just at the top end.

Q71 **Dr Hudson:** Roly, you talked about a common veterinary area there. We want to write a report that can advise the Government on improving things and on the disease implications for the United Kingdom of getting this right. We have had equine herpes virus outbreaks on the continent recently. We wonder about exotic diseases coming into the UK—West Nile virus and things like that. We have the opportunity to get this right, if we get disease surveillance and tracking and traceability. Is there anything you would like to tell the inquiry?

Roly Owers: The principle of a common veterinary area is very much there already, between Switzerland and the EU. It works. We have talked a lot today about the friction in the system. If you have a frictionless system, then the more compliant movements that come into radar, the more focus can be put on the non-compliant movements. The real danger is if we don't get this right and a significant amount of friction remains in the system. Then, as Jan has already said, people will seek to find ways to move their horses which will not always be compliant. That would significantly increase risk, and it is an unknown risk. There is the example of the common veterinary area already there, and there seems to be a very good will from the sector and the Government that it can actually work. Of course, it depends on the digital traceability and equine ID system.

Dr Hudson: Thank you very much, Roly. And thank you, Chair, for your indulgence. I might take you up on it again later.

Chair: I think you might, on the next question. Ian Byrne, please.

Q72 **Ian Byrne:** It is nice following Neil Hudson, the expert on all these matters. It has been a real education listening to him. I'm up in Liverpool, and we can talk about Aintree, I'm sure. I am going to direct the first question to Jan. How many horses are being illegally moved across Britain's borders?

Jan Rogers: Ian, I don't know how many horses are being illegally moved across Britain's borders—[Laughter.]



Ian Byrne: That's the type of answer I like—no nonsense.

Jan Rogers: Yes, absolutely. As I think I mentioned, we have some anecdotal evidence of horses being moved via routes which would not normally have been used before we left the EU. That is information that is received from colleagues, from what people have seen happening at ports, but because they are illegal, there is no data on them, so I can't quantify it any more. It is a question we were asked by the media, and we were unable to quantify it then, other than to say we are pretty sure it is happening, but I can't put a figure on it. I don't know if Roly has any better intel.

Q73 Chair: Jan, we are not going to let you get away with that entirely. You will have to provide something in writing, even if it is only a good guesstimate. I will bring Roly in.

Roly Owers: Ian, thank you for the question. The straight answer is no one knows. It is unquantified because by definition these movements are uncompliant and below the radar. A lot of these horses are going for slaughter—not all, but a significant number. We believe that there is a strong trade in the illicit movement of horses, many of which will end up in European slaughterhouses. It is very difficult to say more.

DEFRA could make some inquiries around this. For example, it was mentioned in the last session that European slaughterhouses should be sending back to UK-based PIOs the passports of horses that go into the food chain. Also, EU member states could be asked how many horses with a GB-registered microchip are slaughtered in their slaughterhouses. There are ways of finding out from the slaughter perspective, but from the non-slaughter perspective, it is very difficult.

We do know, for example, there is one dealer who will make weekly trips to the EU. They have a box that can take between 18 and 20 horses. They will often be double-loaded, so that could be up to 40. If you look at that over a year, you are looking at between 1,000 and 2,000 equines being transported. That is just one dealer. We believe we are only scratching the surface.

Q74 Ian Byrne: Thanks, Roly. Ross, have you got any numbers for me?

Ross Hamilton: Not particularly from the thoroughbred sector. All that I would say is that in thoroughbred racing—as thoroughbreds are required to be microchipped and so on—under our Horse Welfare Board strategy, which was launched last February, we are committed to ensuring responsibility across the whole lifetime of a thoroughbred. That is about enhancing traceability and finding out what happens to horses once they leave their thoroughbred racing careers, and where they go next, so that helps in terms of that. Our remit would not be covering illegal movements.

Q75 Ian Byrne: Thanks, Ross. Just to follow up, in April Professor Tim Morris suggested that a solution would be: "Every horse must have a passport; every thoroughbred has one." Jan, would you agree with that, and what else could the Government do to prevent the illegal movement of horses?



HOUSE OF COMMONS

Jan Rogers: Every horse should have a passport and a microchip. We know that isn't the case; we know that there are about a million horses in the UK. There are more data records on the central database than there are horses, so some of those will have passed away, and there will be a number on there that don't actually have passports that aren't identified either.

That leads us through to the challenges of a paper-based system and keeping that up to date. I mentioned earlier that it is virtually impossible to segregate out the inquiry into movement across borders from equine identification, fundamentally because the whole lot rests upon an accurate central identification system that is digital, which allows people to go in and update their information quickly and easily. On top of that, you can add all the extra things that are required, such as zootechnical certification for horses that have pedigrees and certification for horses to move across borders.

But the fundamental, central, digital equine ID record is the thing that will enable easier enforcement. At the moment, authorities have access to the central equine database. The Food Standards Agency has access to the central equine database, and policing and crime enforcement bodies do. The information on there will give those people indications of where the challenges lie, which goes back to the point Roly made about intelligence-led enforcement. But that does rely upon the fundamental record on the system being linked to a microchipped horse. So every horse should have a passport, but in an ideal world that passport would take the form of a digital identification record, which could be held on a smartphone. The whole lot then becomes a lot easier to enforce.

Ian Byrne: Thanks, Jan—good answer. Roly, would you like to add anything?

Roly Owers: The future is certainly digital, not paper, as Jan said. What we do know is that in the current system, since we've left the EU, despite all the problems with compliant movement of horses, there is no indication that the volumes of those travelling below the radar have decreased at all.

The problems with the current system are that there is considerable fraud because of the challenges; there is considerable variation in the paperwork due to the different organisations that issue it; there are considerable problems, especially from GB to Northern Ireland and Ireland, in terms of transporters getting under the radar by saying that they are non-commercial when they are really commercial; and there are significant issues around enforcement—lack of joined-up enforcement or inappropriate enforcement. Of course, the bedrock comes back to that digital ID and traceability system. Yes, each horse should have a passport, but even more importantly they should have a digital ID to create a frictionless system that is very easy to maintain.

Ian Byrne: Thanks, Roly, very good answer. Ross, would you like to add anything?



HOUSE OF COMMONS

Ross Hamilton: Nothing much, other than that the digitisation of records is very much something we are pursuing in the thoroughbred sector, and we would be fully on board.

Q76 **Chair:** Before we let Neil Hudson in, I'm going to come in with a quick question to Roly and Jan. How many horses have more than one passport? This has been a real issue in those that are, as you say, Roly, flying beneath the radar. I know there is the microchipping as well, but, as you say, there is still a lot of fraud going on. Have you any idea at all?

Roly Owers: Unquantifiable, I think, Chair. All I can give you are some case examples. There was a very recent case example of an owner who had multiple horses. He sold them to a dealer, but because those passports were replacement passports—therefore, by definition they were signed out of the human food chain—the dealer took the horses and left the passports. We certainly know of transporters who will transport horses—different horses—on the same passports.

So it is as leaky as a sieve, the current system, and until that system is tightened up and is easy to enforce, these things are going to carry on. But I think you can confidently say that there will be a lot of horses—a significant number of horses—that would have more than one passport.

Q77 **Chair:** So you have really got to get to a stage where you can have an electronic scanner that can pick up the electronic number on the tag, or the chip, in order to be able to check, and I don't suppose we are anywhere near that yet, are we?

Roly Owers: Well, the central equine database and additional stable—

Q78 **Chair:** We are?

Roly Owers: Absolutely, yes. The whole system of the equine ID has evolved since the horsemeat scandal in 2013; it was effectively started then. We have made such good progress since then, but we are coming up to the last chance saloon, where we can really create this system that is going to be long-lasting, frictionless and therefore far less subject to abuse.

Q79 **Chair:** So, basically, the problem is getting it out to those in the horse society who are hardest to reach—I will be very diplomatic this afternoon. So that is where it is basically, is it Roly, putting it bluntly?

Roly Owers: It is about getting it to the whole equine sector, because there is a real problem, in that many people think that the horse ID system is a bit of a joke because it is so poorly enforced. So enforcement is critical—we've got to get the system in place. But then it has to be a statutory duty on local authorities to enforce it, because there is no point having a law if you're not going to enforce it.

There has got to be some carrot. There are some real benefits to equine owners from having an effective equine ID and traceability system, but there's got to be a bit of stick for those who don't take it up. Fixed penalty notices are now possible, so local authorities don't have to take people



HOUSE OF COMMONS

through the courts. It is a matter of joining up all of those pieces, but it will come down to enforcement with those who perhaps choose not to comply.

Chair: Okay. Thank you. That is some good evidence for us. Right, Neil—over to you. Sorry I nipped in before you, but that’s the Chairman’s prerogative.

Q80 **Dr Hudson:** That’s all right. Thank you, Chair. A quick-fire round again. Coming back to Roly, I just wanted to explore very quickly the welfare issues. This is a movement across borders of animals. The movement of horses, as you said in one of your previous answers, Roly, is not without stress for the people and very much for the animals concerned. But it can be done and is done very well in the high end, often with vets and grooms travelling with the horses, and also owners moving their horses around, with frequent stops, and they do it very well.

We have been exploring the more illegal movement of animals, under the radar, and it would be useful for the inquiry to hear from you, Roly, about any issues that your organisation has seen with that form of transportation. You mentioned certain movements of animals where you get many, many horses on a truck. If we could get on the record this illicit movement of animals, potentially for slaughter, under the guise of competition or something like that, and the welfare implications of this lower end of the movement of animals, we could really highlight that as a Committee and then make recommendations on it.

Roly Owers: Obviously, it comes back to that whole issue of being able to define how many of these horses there are. Until we know that, it will be difficult to get the scale of the problem, but as I have said, we believe it is a significant trade. Because these animals are being moved, potentially on extremely long journeys, and their welfare is not a priority, we have seen first hand that there are significant implications. There is no getting away from the scale of the problem, and we need to be able to put in a system, especially around digital ID, to be able to enforce things.

There are a number of dealers, as I have said, who are making regular trips between Ireland and Great Britain and mainland Europe—

Q81 **Dr Hudson:** If I could interrupt you, could you articulate some of the implications for the horse from, potentially, a lack of water and being transported in unsuitable vehicles? Are there any incidents of injuries that you could highlight to the Committee?

Roly Owers: There are multiple welfare issues, absolutely. You start with the vehicle. Some of these non-compliant vehicles will be overweight. The competence of the driver is often questionable and therefore the movement is extremely rough. There will be significant injuries to horses, which we have seen at first hand at some border control posts on the continent. They will not be getting the proper rest stops—which under current law need to be every nine hours—or then, every 24 hours, getting a stop, obviously with ad-lib food and water through that journey. That is simply not happening.



Of course, we know that a significant number of these animals are diseased. Therefore, their own individual welfare is extremely compromised, but they also pose a significant risk to the countries in which they are travelling. Because it is all happening under the radar, we know that individual animals will make the journey in a circuitous fashion. Animals that start in Ireland will end up in Ireland but they will have been to Great Britain and mainland Europe in between because they are being passed from pillar to post in a very murky underworld. So, yes, there are massive challenges on both a health and a welfare basis that need driving down. That is what the intelligence-led enforcement needs to focus on.

Q82 Dr Hudson: Thank you, Roly. It is really important for us to get the implications on record. If we get this right with traceability, digitisation and so on, can we close these loopholes and ultimately stop this traffic that is affecting the welfare of individuals and groups of animals? If we get this right, can we improve equine welfare?

Roly Owers: Absolutely, without a doubt. But obviously we need the system in place, and then you need the joined-up system around enforcement.

Sorry, I might have said earlier that it is not always low-value transporters taking low-value horses. Sometimes they are not. Sometimes they are taking horses of greater value than that but, as Jan said, they are circumventing the system and finding ways to do that.

Absolutely, we would be extremely confident that, if you had that digital ID and traceability system, and infrastructure at border control posts that allows those high-health movements to be completely frictionless, and then you focus down on the non-compliant movements, you would have a system that would work. It would protect the sector and equine health and welfare at the same time.

Q83 Dr Hudson: Thank you; that is really helpful. One more quickie—please indulge me again, Neil—for Roly or Jan on a very emotive topic. We have touched on horses being transported for slaughter, and the concept that horses might be slaughtered and ultimately go into the food chain is very emotive for some people. Can you put into perspective how the capability of the abattoir system in the UK to cope with equine slaughter is very limited? Could you put on record why it is that animals are being shipped to Europe? Why can't they be addressed in this country?

Roly Owers: I can start on that, and then I am sure Jan will come in. We have four slaughterhouses in the UK that are registered to take horses, but only one takes them in any significant number. We would have concerns if there was no slaughter capability, because that would be an even greater case for driving this underground movement of horses. So there is the capacity. We know that, at the moment, the UK slaughterhouse is implementing the regulations as they should be done, but while its number of horses in 2012-13 was about 12,000 a year, it is now below 3,000, so there has been a significant reduction. If that goes down much further, obviously there will not be a case for keeping it. So



HOUSE OF COMMONS

that is a concern. If we do not have that slaughterhouse, there will be an even greater concern about the movement being driven underground.

Dr Hudson: Thank you very much. Thank you, Chair, for your indulgence on that.

Chair: Thank you, Neil. Good questions and good answers. Derek with question 5, please.

Q84 **Derek Thomas:** Thank you, Chair. It may be that we have covered most of this, but I will ask the question because you may have things to add. The Government have announced that they will consider changes to equine identification traceability to improve biosecurity and animal welfare. What further things would you like to see as part of the consultation on this Government consideration?

Jan Rogers: We are very grateful for the opportunity to contribute to this comprehensive review of equine identification. As you say, the current statutory instrument covers quite a narrow area of equine ID—microchipping and the penalties for non-compliance. We have already discussed the challenges of the current regime and the fact that it is not really taken seriously, dare I say, by the British horse-owning public because it lacks teeth. There is very little enforcement, which is understandable because local authority enforcers are embedded in enforcing other areas. Horses are difficult: they are big, they are complex, they are frightening. It is a challenge, where resources are limited, to invite people to get involved in the horse world, which they are not familiar with.

A comprehensive overhaul of the equine ID system, where a digital record is fundamentally central, will enable that enforcement to be carried out largely remotely. That is probably one of the biggest and most important things. If enforcement is to happen, which it needs to for horse owners to have confidence in the ID system and to feel like they should comply with it and that there is a benefit to complying with it, it needs to be easier to bring about. If these records were held centrally and were digital, all the other important things in the horse world, in terms of paper records, would hang off that digital record and would be linked to it and could be updated by different bodies—studbooks and so on. That would be the single biggest thing that we could do that does not already exist to bring about better enforcement and to improve the confidence of the British horse-owning public in the current system.

Q85 **Derek Thomas:** Thank you, Jan. That really is helpful. Do you find that there is an appetite within DEFRA to look at that? Is it DEFRA?

Jan Rogers: Yes, it is DEFRA—you are absolutely right. There is an appetite. We have been invited, as the British Horse Council, to contribute a paper regarding our thoughts as to how this could be carried out, how expansive the current statutory instrument relating to equine ID could be and what other things could be brought in. This is an opportunity. As I mentioned earlier, many of these things are interlinked, and fundamentally that accurate central data record would enable so much



more to happen. By the end of this month, we will supply those recommendations to Government, such that they can look at what the British Horse Council is suggesting. They can also consult other elements of the equine sector, such as studbooks, passport-issuing organisations and other stakeholders, to look at those recommendations and put out a wider public consultation later in the year. We are actively engaged with that and 100% behind it.

Derek Thomas: Brilliant. Thanks, Jan. Ross, did you want to add anything?

Ross Hamilton: We absolutely support what Jan has been saying. In the thoroughbred industry, we are fully committed to it, as members of the British Horse Council. I think it is fundamental, going forward, that there is an accurate understanding of horses that are in the UK, where their ownership is and easy ways of understanding ID. That is something that we in the thoroughbred industry, as I mentioned before, are absolutely stepping up on as well, in what is already a highly regulated sector. It is important that we have that confidence in order to support this country's ambition, which I think all of us share, to underpin and strengthen animal welfare for all horses in the country going forward.

Q86 **Derek Thomas:** Great. Are there other things that you would like to see in the consultation?

Ross Hamilton: No. We are content at the moment, in line with what has been outlined by the British Horse Council.

Derek Thomas: Roly, over to you.

Roly Owers: Thank you. I echo what Ross and Jan have said. I think there are some really important issues that need to be focused on. There is always confusion about whether the owner or the keeper should be responsible for an equine's record, and we therefore support the adoption of an operator concept, which could mean the owner, the keeper or both. As I said earlier, it is really important that all premises where equines are habitually kept are registered, which is vital from an equine disease perspective, and that that digital movement record for horses—where they have come from and where they are going—is developed and monitored.

Let me come back to enforcement. It is so important, certainly within the UK, that, with customs, APHA and the other enforcement agencies, it is joined up. They have to be resourced. We passionately believe that it should be a statutory requirement to enforce equine ID regulations, but they have to be appropriately enforced and trained to be able to do that. As Ross has already said, the benefits to the UK equine sector are massive, because if that does not happen, it puts at risk that £7 billion industry. For so many reasons—from equine health and welfare, to the economic viability of the sector—we need to get equine ID, traceability and a fully digitalised system right.

Q87 **Derek Thomas:** Briefly and finally, is there a risk that we end up penalising the very people who are doing everything as best they can



HOUSE OF COMMONS

now and within the law? With all the things you suggested, could we still end up with some people under the radar and not actually coming to the table to do things correctly? There is always a risk of that, but how confident can you be that your suggestions would genuinely rule out the appalling behaviour that we have been learning about this afternoon?

Roly Owers: I am sure that Jan will comment, but we are acutely aware of that. Unintended consequences are something we are constantly looking at. We have very much focused on where the friction is in the system—friction for everyone: the non-compliant as well as the compliant. What we are seeking to do, for example, is to make it free to update records, rather than the charged-for system that many face at the moment, and to be able to do that online, so it is very much like buying and selling a car. We are trying to take that friction out of the system wherever possible.

Jan Rogers: I agree with everything Roly says. It also allows us to support the derogated population, who have different needs. There is an opportunity to bring in, for example, the concept of temporary records, which will support a community that is constantly speaking to Government about the challenges it faces. In addition, it enables us to loop back to the purpose of this inquiry, which is movement of horses across borders. By August, we will need premises from which horses travel to have a premises identification code. That concept exists within the digital ID world, so we have that central record for the horse's ID and the premises where it is kept. That code can be inputted into the export health certificate, which is a requirement for the EHCs post August this year. We actually have the trigger that will enable us hopefully to enact some elements of that early doors and build on it.

Your point about unintended consequences is really important, but by making it easier for everyone to comply by using a central digital online system, the pain that people currently experience with regard to completing changes to their horses' identification records will be removed, improving compliance and giving us a better central system, enabling enforcement to be focused on those that do not.

Q88 Derek Thomas: Thank you. Unless you want to come in, Ross, I have finished, other than to say that we have just given DEFRA, which is already a very busy Department, a whole lot more work to do.

Ross Hamilton: No, other than probably to apologise to DEFRA for all the work we are giving them. It would be important to add that our sector has been proactive throughout in offering solutions, expertise and help. Government do not need to be doing the heavy lifting on their own; they can continue to work effectively with our sector to help deliver the better outcomes across all the areas we have discussed this afternoon.

Derek Thomas: That is a good point to end with.

Q89 Chair: Just before we leave our great panel, on the point that Derek asked about and that you made, Ross, do we have a digital system up and running that is capable of being introduced to import and export



HOUSE OF COMMONS

through Europe? There is a real argument now to try to get a digital system recognised by the European Union. Have we got one, especially in the higher end of the breeding sector that will be using it properly? Have we got a system in place that we can offer to the EU if we can get an agreement?

Ross Hamilton: Yes. In the case of thoroughbreds, we have the Weatherbys e-passport system that is in advanced stages of development. Weatherbys acts as the studbook for Britain and for Ireland—both sides of that conversation. There is certainly a workable solution, and I believe there are workable solutions that exist in the wider equine sector as well. There are available solutions that have been worked up by the wider equine sector, and that the taskforce that we have been referring to throughout this panel have been working on and making representations on to the European Commission, DG SANTE and national Governments. The important thing is that, as a European sector, we are working together on this and working on the solutions. If they can be implemented, we can resolve a lot of these issues and challenges relatively quickly.

Chair: Thank you. I don't know whether Jan would like to add to that.

Jan Rogers: Thank you, Chair. In addition to what Ross has said about the Weatherbys system, there is the central equine database, which I mentioned earlier. This links back to a question that you raised, Chair, about whether there is somewhere I can go to check a record of a horse. You can go to the central equine database and input a microchip number, and that will tell you whether that horse has a passport and which passport issuing body issued that document. That system is already in existence. It is a system that works in tandem with other digital systems, and the FEI—the international sport horse body—is also developing a digital passport system. What is important is the interoperability between the systems, but the important takeaway message, and for the record, is that they do exist and can be adapted. We are not looking at creating something new; we are looking at adapting what we have and expanding its capacity to meet our new needs.

Chair: Thank you. Roly, do you want to make a final comment?

Roly Owers: All I would say, to add to what Jan and Ross have said, is that the equine register system—the central equine database—uses banking-level software. Yesterday I signed up to the NHS app and had to go online to do the passport and everything. It is exactly the same for equine registers. It is a really robust system, and it has been set up so that it can, through APIs, interface with other systems. As a central block to it, it is good to go.

Chair: That is good. It may make part of our recommendations to DEFRA, but we have yet to decide that. I thank all three of you—Jan, Ross and Roly—for an excellent session. You may stay on and listen to the next one, or you may depart from us now, but thank you very much. That was a really good evidence session from all three of you, and it will be good evidence for us to put in our report. We will allow you to disappear or stay



and watch— whichever you prefer to do. Thank you very much.

Examination of witnesses

Witnesses: David Bowles, Paula Boyden and Maggie Roberts.

Q90 **Chair:** I will take ladies first. Paula, would you like to introduce yourself first?

Paula Boyden: Hello, Committee. I am Paula Boyden. I am veterinary director at the Dogs Trust. We are the UK's largest dog welfare organisation, and I am giving evidence on behalf of the Dogs Trust. One of the key things in which we have been involved in this area, for just over five years now, is our puppy pilot down in Dover, where we basically facilitate the seizure of illegally imported puppies. If they are abandoned, we will quarantine them and then responsibly home them afterwards. To date, we have cared for over 1,500 puppies, with a street value of over £3 million.

Chair: Thank you, Paula. I know that you and the Dogs Trust have done a great deal of work on this.

Maggie Roberts: Hello. I am Maggie Roberts. I am the director of veterinary services for Cats Protection, which is the UK's largest feline welfare organisation. Obviously, I am here to represent the feline side, because I think that cats often get forgotten in a lot of these discussions. Obviously, there are a lot of very serious canine issues, but there are also feline issues as well. As an organisation, we have been trying to raise awareness of these issues with cats and also things such as the compulsory microchipping of cats, which is sort of indirectly connected to this. We are very keen to get the feline side across. *[Interruption.]* My own feline has just walked across the screen.

Chair: It is a lovely cat, too. I assure you that the EFRA Committee takes cats very seriously, as well as dogs and many other animals as well, so don't worry about that. Thank you very much for joining us this afternoon. David from the RSPCA, please.

David Bowles: Thanks, Chairman. I am David Bowles. I head up the RSPCA's public affairs work. For Committee members who don't know, the RSPCA is responsible for about 85% of enforcement effort under the Animal Welfare Act 2006 and—this is obviously of relevance to the Committee today—for investigating puppy dealers, puppy smugglers and those who crop ears as well.

Q91 **Chair:** Right. Lovely. Thank you very much. It is good to have all three of you here to give evidence to us this afternoon. I will start with the first question. How will owners who want to take their pets to the EU be affected by the UK being granted part 2 listed status? Is it going to be a lot more difficult? How is it going to be? We will talk about importation in the next questions, but how will going across to the EU be affected?



HOUSE OF COMMONS

Perhaps you would like to have a bash at that one first, Paula, and then I will bring David in.

Paula Boyden: Absolutely. Having part 2 listed status will be a hindrance to pet-owners wishing to take their dogs—and cats, obviously—both to mainland Europe and to the island of Ireland, which is obviously another area of focus. The requirement now to obtain an animal health certificate within 10 days of travel is certainly going to be a burden for the owner in terms of extra cost, because every time they travel they are going to have to seek an animal health certificate.

The other thing I would mention is that, obviously, it is going to be the veterinary profession that will issue the animal health certificates, so there is going to be an impact on the profession. We know, for example, that in terms of animals coming into the country, over 300,000 came into the UK through the pet travel scheme in 2019. What we don't know and are trying to find out at the moment is how many of those were of British origin, which might give us an indication of the level of animal health certificates that are going to be required and the impact on the veterinary profession.

As I say, considering the island of Ireland, there is certainly an extra burden there and there are obviously lots of considerations for Ireland. There is a concern, for example, that having to tapeworm-treat a dog every time it goes to Ireland is disproportionate. Again, the animal health certificate side of things, particularly for individuals who are travelling quite frequently, is something that needs to be addressed.

Q92 **Chair:** Is it your own vet who would be able to issue the health certificate, or do you have to get it from DEFRA or somewhere else?

Paula Boyden: My understanding is that it would be an official veterinarian that will have to issue the certificate. Most practices will probably have a trained OV within their practice. You would need to be an OV, for example, pre-EU exit, to issue a pet passport.

Companion animal practices will not have lots of OVs, because they probably don't have that volume of work. There are lots of considerations to take into account in terms of frequency of travel, how often these certificates need to be issued, and at the moment the work involved in actually completing the paperwork. As we know, if it is incorrect, that will impede the ability to travel.

Q93 **Chair:** Thank you, Paula. David, please, and then I will bring in Maggie about cats going on holiday.

David Bowles: Thanks, Chairman. I have two additional points to make. First, as the Committee knows, if you are going to Northern Ireland from Great Britain, you will need a pet passport, which you have never needed before. The second most important thing is that we are now coming out of lockdown, and this week people are starting to book their holidays. I do not think many people know that the system has changed and that their pet passport no longer applies if they want to go to France, Spain or Portugal. I believe that there will be a lot of problems if people do not go



and get the right paperwork. We know that, under coronavirus restrictions last year—understandably, of course, because people were not travelling—the number of people going abroad with their pets and coming back crashed completely. In March and April, it went down by something like 80%. Because there has not been a lot of information about this, I think you could see people turning up, expecting to go away with their old pet passport and being turned back.

Q94 **Chair:** You raise a really interesting point, David. What we are highlighting today is in public. I think DEFRA probably needs to do more on its website and everything. We have got to get the message out there that health certificates are needed and that you cannot just go with your pet—your dog or whatever it is—as you did before. Thank you for that. Maggie, I imagine people do travel with cats. How much of a problem are cats going to be having in their travelling?

Maggie Roberts: I suppose the reality is that cats do not want to go on holiday. It is a bit sad when people take their cats for a short journey. Obviously, there are circumstances where people are moving abroad or moving back to Britain from living abroad and it may be appropriate, but my personal view is that, if it is difficult to take a cat abroad, that is a good thing. It is highly stressful. All the scientific evidence on cats and travel shows that it is stressful and increases their risk of developing disease, particularly if they are already clinically affected. A big concern is the growing number of cats that are being brought in from abroad—things like street cats that people are adopting. That is something we may talk about in a bit more detail later.

To add to the comments that Paula and David made, I was an OV when I was in private practice, prior to joining the charity sector, and it is always very stressful doing any sort of transport certificate, because if you get it wrong, obviously it has very serious consequences. My understanding from colleagues in practice, and from looking at the veterinary press and social media, is that vets are finding it very confusing at the moment. A lot of people are uncertain about what sort of certificate is needed. If a client has an old pet passport, is that okay for getting back into Britain, and so on? Obviously, they still have to do the animal health certificate to leave.

There is a lot of confusion, both in the veterinary profession and among the public. Certainly, a lot of colleagues have had situations where a member of the public turns up wanting a certificate, they have not left enough time, and then they get angry with the vet, even though they have not followed the rules. We definitely need to get more information out there about what the regulations are. Certainly, from a cat welfare perspective, we should educate people that cats travelling long distances, unless it is essential, is not good for their welfare.

Q95 **Chair:** I quite agree with you, and also cats do not really like fresh territory. They are very territorial animals.

Maggie Roberts: Highly territorial.



HOUSE OF COMMONS

Chair: We have one—Charlie—that has really taken over the farm and doesn't really like any other cat coming in. He would not appreciate being taken anywhere, I don't think. Thank you very much for that. Rosie Duffield, I think you were going to come in on question 7.

Q96 Rosie Duffield: You have largely touched on what I really wanted to ask you. I have received—as have probably all the Committee—thousands and thousands of emails about puppy smuggling over the last few years, and about the worries about taking domestic pets on holiday and when moving abroad. Does the panel think we have got the balance right between stopping these illegal imports and the problems they cause, and the freedom for people to travel with their pets? Were there any unforeseen things that have been highlighted by the way the Government carried this out? Are there any problems that you don't think they wrote into the legislation? We just heard David say that there is a lack of information and pet owners do not know what is going on. If any of you could give a quick answer about what you think we might have got wrong and right, and what else needs to be done, I would be very grateful.

Paula Boyden: I am happy to start, if that is okay. I will try to be brief. One of the big challenges with smuggling is that, when the rules changed in 2012, the minimum age of entry plummeted from 10 months down to 15 weeks. That is what has precipitated it—because it is 15 weeks, we are getting puppies in. We have had puppies come through our care as young as four weeks—they are not legally allowed to leave mum at that point, let alone travel. That is one of the big challenges and, as I am sure we will come on to, things around that.

Q97 Chair: Paula, sorry to interrupt. Rosie, I think you have stolen quite a lot of question 8, so, Paula, will you talk more about problems with taking pets out, rather than smuggling puppies in, because we will deal more with that in question 8? I will ask all members of the panel to answer Rosie's question in that way.

Rosie Duffield: Apologies to whomever has question 8.

Paula Boyden: In terms of animals leaving the country, we have mentioned the current challenges of animal health certificates. I will not go back to that. One area that is overlooked is the perception that, if you comply with the rules of pet travel, you are safe to take your pet abroad, whereas we know—particularly with illegal importation and the import of adult dogs for rescue—that a number of diseases found in mainland Europe we do not have in the UK. That has been propagated. One big error on that, in my opinion, was to remove the necessary tick treatment on re-entry to the country and to increase the tapeworm window before coming into the country. I am sure that Maggie will mention the tick and tapeworm side of things with regard to cats as well. We are exposing the UK dog population indirectly by that, because when people go abroad, their pets are picking up some of these diseases and they are not only becoming unwell, but bringing those diseases back into the country. Another area that I am sure we will touch on is the importation of adult dogs for sale and the risk associated with that.



HOUSE OF COMMONS

David Bowles: You are right, Rosie, that the Government had to find a balance between ensuring that people could legitimately take their dogs abroad on holiday or to dog shows and not increasing the number of illegally smuggled dogs coming in. One issue that I think they got wrong was the number of animals that you are allowed to have with you. That was set at five, and probably now we would recommend it being reduced to, say, three. That would let people go on legitimate holidays with their dog, cat or ferret, but would stop people coming in with large numbers of dogs which are clearly not their own, but which they are using for the puppy trade.

One of the things that happened when we changed the rules in 2012 is that a lot of the commercial trade came under the pet non-commercial trade. Fortunately, because of enforcement effort by our vets talking to vets in other countries, a large amount of that trade went into legitimately coming in as commercial trade. That has improved, but I worry that unless we reduce the number of dogs and cats that you are allowed to bring with you, we will start to see the trade switch back from being legal at commercial and going into being illegal at non-commercial. Do not forget that non-commercial trade is only about people's pets, so if you are bringing in dogs or cats commercially—that includes rescue organisations like our own—you have to bring them in under the commercial rules.

Chair: Thank you, David, good point. What about Maggie?

Maggie Roberts: Paula mentioned the tick treatment for dogs being stopped. Now, neither tapeworm nor tick treatment is required for cats. Although the diseases that Paula mentioned are less common in cats, it is still possible for them to carry things like *Echinococcus multilocularis*, which is a severe zoonosis in humans. Central Europe has relatively high prevalence in cats of things—in Switzerland, southern Germany and so on. If we treat the dogs but not the cats, there is still a chance that we could get a serious zoonotic disease that we currently do not have in the country.

Also, although far fewer kittens are being smuggled, kittens are still coming in, often in carriers in the back of people's cars from places like Bulgaria and Romania—usually pedigree kittens—so this is happening. It is very easy to smuggle a basket of kittens in, perhaps in comparison with puppies.

Likewise, on the whole thing about the age at which cats can come in, young kittens can come in, whereas before they had to be significantly older. We would certainly be very keen to go back to a system where kittens and puppies needed to be at least 24 weeks to enter. They have to be 12 weeks before they can have their rabies vaccination and then allow another 12 weeks, which is the rabies incubation period. The period of the three-week wait, which we were forced to comply with under EU rules, was really just the time that it takes for the vaccination to be effective, but an animal may already have contracted rabies, so we would certainly like to see that 12-week wait added on.



HOUSE OF COMMONS

That would mean that the puppies and kittens would be 24 weeks old before they came in. Then there would be less appeal in terms of trying to get young animals in for sale. Also, it would be easier, certainly from a cat perspective, for people who were doing inspections at the port to actually be able to get an approximate age of the animals, because they are getting their adult teeth at that sort of age. There is a lot that could be done.

I think biosecurity is probably going to be another question, but we would like to see the reintroduction of the rabies antibody titre, which again was dropped, because there is significant evidence that the protection given is related to antibody levels. There is a correlation there.

Chair: Thank you. Right, I think Robbie is going to start question 8.

Q98 **Robbie Moore:** Some points have already been picked up on, but I will ask the question and a few supplementaries that follow on.

The Government have announced that, to tackle pet smuggling, they will reduce the number of pets that an individual can travel with and raise the minimum age for a puppy being brought into the UK. How many pets do you think someone should be able to travel with and what should the minimum age for a puppy be?

David Bowles: We have all agreed that three is a fair balance for the number of dogs and cats per person. As Maggie has just said, raising the age from 15 weeks to 24 weeks would not only stop the dog being cute, because it is going from a puppy into an adult dog and therefore is not going to be marketable when it gets to that age, but also it is easier for the border enforcement people to age it. If you imagine you are a border enforcement person at Dover, trying to work out if a dog is 15 weeks or 14 weeks, depending on their teeth, it is an almost impossible task. If you are at 24 weeks, the adult teeth are coming through. It is much easier to age. From an enforcement perspective, that would be a fair way forward.

Q99 **Robbie Moore:** Are there any additional changes that the Government should be looking to make to import rules to tackle pet smuggling?

David Bowles: Enforcement is obviously going to be crucial. There is no point in changing the legislation unless your enforcement is working properly. I think we all accept that enforcement, particularly in the channel ports, is not as good as it could be. Under coronavirus measures, for instance, APHA were not doing on-the-spot checks at the final destination, and so we had reports of people coming in, getting through Eurotunnel and literally driving up the M20 and M1 and dropping dogs off at each individual point, to rehoming that they had already got sorted out. That cannot be right, not just from an animal welfare perspective, but from a disease biosecurity perspective. Enforcement is going to be crucial.

We have been putting out educational messages for decades, and unfortunately, I think we have to accept that educational messages are only as limited as they can be because particularly puppies have got this cute factor. Once people see them, they think they are going to rescue



HOUSE OF COMMONS

them, or they have already made up their mind to buy them, and that is why educational messages are so difficult with this particular trade.

Maggie Roberts: Obviously, we are disappointed that these suggestions only talk about puppies. We feel strongly that it should be about kittens as well—the aim should be changed—and about the number of animals that come in from a household. Our data shows that only 4% of households have four or more cats, so if the number was reduced to people being allowed to bring in three of their own cats, that would not affect many genuine owners. Like puppies, kittens also look cute, and of course, getting a puppy or a kitten is an emotional purchase, so if they are that bit older, I think that would be significant.

On the enforcement issue, a big part of the problem is that they only check those owners who have declared that they are bringing an animal in. We really need to start doing some random checks, particularly on car ferries, for example, because it is particularly easy to have a cat basket hidden away in the back of a car, and if we are never checking vehicles other than those that have declared their pets, we are going to miss an awful lot being smuggled in. That is obviously very poor welfare for the animals in those circumstances, and there is the risk of diseases that they may bring in, because they may not even have had the rabies vaccination.

Robbie Moore: Paula, do you have any additional comments on that point?

Paula Boyden: Certainly, on the number of animals, we would agree with three. A paper published a few years ago showed that over 95% of dog owners in the UK had one, two or three dogs, so three would be proportionate. Sitting alongside that is the derogation of individuals travelling to shows, for example. That needs to be applied robustly, because with all of this we have to think about what the loopholes around it are.

I totally agree with the six months, but I would say that the devil is in the detail of how that is applied. There are two ways you can apply it. One is to set a minimum age of six months, but trying to go from a logical perspective, I would advocate a 12-week wait period across the border for all dogs coming into the country, and preferably a rabies titre test as well. The reason I say that is twofold: prior to 2012, we have 12 years' serology data, and we know that young dogs under a year of age respond less well than adult dogs.

There have been a couple of papers published recently in the Nordic countries, looking at dogs from their own country compared with imported dogs, and there has been a significant difference in the rabies titres and those that actually have a protective titre before getting into that country. That is something that we really do need to look at.

I would really endorse David's comments. One of the things we need to do is enforcement. That is across the board in terms of having the appropriate resources. For example, during the pandemic, as David has



HOUSE OF COMMONS

alluded to, there were no post-import checks for Balai shipments, and we know that the market shifted across to commercial shipments—we can see that from the ITAC certificates that were issued. We also need proper penalties. There are no deterrents here—this is a high-reward, low-risk crime—and certainly out of the in excess of 1,500 dogs that we have now helped, there have been two prosecutions, both of which were a low monetary fine, with no custodial sentences, so frankly, it is worth taking the risk.

Lastly, on Maggie's point about looking for smuggling, the risk is that if we raise the bar, people will truly smuggle rather than what we are seeing at the moment, which is illegal import. We have certainly done some background research. There are ways and means of searching for hidden puppies and kittens, and that is the thing that we do need to explore.

Q100 Robbie Moore: I have one more question. We have all heard of the term "catfishing", but "petfishing" is becoming much more of an issue. What are your thoughts about tackling the online challenge and the promotion of petfishing, and how we can really drill down on individuals who may be looking to buy cats, kittens, dogs and puppies online, where there may be animal welfare issues attached to it?

Paula Boyden: One of the big challenges with advertising online, and what we have in the UK, is that we do not even know exactly how many dogs are in the UK because we have a lack of traceability. You have to be licensed only if you are breeding three or more litters a year; with fewer than three litters, there is no traceability.

We are looking at and exploring a process of registration and licensing, so if you are selling a puppy you at least have to be registered. The rationale for that is that there could be a requirement to either put your registration or your licence number on any advert to sell, which then starts to give traceability and can take you back to an owner.

The analogy I use is with the online sales of veterinary medicines. Retailers are authorised by the Veterinary Medicines Directorate. They give you a logo to put on your website. If you click on that, it takes you back to something that says, "This is a bona fide seller." Something like that might help to crack down on this.

We know from our work that sellers have pay-as-you-go SIM cards. They will have the French bulldog phone and the pug phone, and then they just throw them away. Until we start getting that traceability, we are really going to struggle.

Michael has mentioned microchipping. At the moment, for pet travel, there is a requirement to microchip a pet, but there is no requirement to register that microchip on a database. In terms of importation and trying to trace back where these puppies are coming from, we are struggling, so a requirement to register on a database would be a step in the right direction.

Maggie Roberts: It is really important that we register the chips of all the animals that are being imported into the UK on a database when they come into the UK, so we know that those animals have come in legally. We get a lot of cats with foreign microchips that we cannot trace that end up coming into our care. We do not know whether they have come in legally or not, so we often have to put them through the quarantine process. To have increased traceability is important.

Following on from what Paula said, there is no licensing of cat breeding in the UK. Hopefully, it is something that will come into being at some point—they are going to introduce it in Scotland—but there is currently no method of tracing that.

As mentioned, a big point is that getting a new pet is an emotional purchase. We have to do more to educate people before they start looking for their pet, so that they know things to avoid and things to use, like the kitten checklist and the puppy contract, so that they have advice about visiting pets with the parents and so on. It is too late once they are online. As Paula says, it would be good to have licence numbers on adverts, but we need to do more before they have even started looking for a new pet.

David Bowles: The Petfished campaign by Defra in England and by the Scottish Government in Scotland is very welcome. I am delighted that Defra have a budget to run it again this year. To go back to education, those campaigns were successful in getting to the target audience using the right media, but did they have any impact on buying behaviour? Probably not.

You have to make sure that the legislation and the databases are correct. In addition to what Maggie said, we have 14, 15 databases now, up from four in 2016. They are not talking to each other. If the RSPCA picks up a dog or a cat and wants to find out where it is from, we have to make 14 different phone calls, which is just bonkers. We need Defra to do something much more rigorous and have a mandatory system for approving databases before they can go online.

You just heard evidence from the equine sector. While the equine sector is not perfect, at least there is one equine database and it works a lot better than it does for dogs and cats.

Q101 **Chair:** Before I bring in Neil, I agree with you entirely about the database. Not only does it have to be one database eventually, but it has to be kept up to date. It is not only about registering the pets but about registering every time the pet changes hands as well. That is a real issue, especially with smuggling.

I want to ask all three of you about the fact that I am keen to see the number brought down to just two pets—two dogs—being taken in and out of the country, but I see you have all opted for three. Do that many people take three of their own dogs or cats out and back in? I would have thought two was more sensible. What is your logic on that?



HOUSE OF COMMONS

Paula Boyden: Our logic is really from the data, from which we know that over 95% of dog owners own one, two or three dogs. The data we do not have, but which perhaps ought to be collected by our carriers, is how many people are travelling with multiple pets, because obviously we need to understand the impact of a reduction even beyond three pets.

Maggie Roberts: Likewise, it is a very similar percentage of people who have four or more cats. I personally would love it if it was only two—I think the lower, the better—but I suppose that when you are making a jump from five, you will get people who are unhappy about that. Certainly, for commercial movement, three animals is probably not a huge issue, but I would be happy to see a lower number.

Chair: Okay, I will take that; I can understand the logic of that. It would be interesting to find out how many actually took two to travel with, but anyway, we will not discuss that further.

Q102 **Geraint Davies:** Can I start with David? Lord Goldsmith told us that there was consideration of further work between Border Force and the Animal and Plant Health Agency. However, my understanding is that the Animal and Plant Health Agency subcontracts its checks to trading standards, and trading standards will not work out of hours over the weekend, so there is basically an open door for smugglers between Friday and Monday. Trading standards do not do visual checks either; they just do documentation checks. Given the huge growth in the number of dogs coming over, is this not a massive problem, particularly as no further funding has been given in the last five years?

David Bowles: Absolutely, and you have to remember that this is a large-scale, high-economy trade. The people who are bringing in puppies in particular, or smuggling them in, are doing so not because they like dogs, but because they make money. You can buy a dog in Romania for €40 and sell it here for £400 or even £1,000, so the mark-up is huge. All you have to do is pay your petrol.

These people are not stupid. They know when the enforcement agencies are out. They know that if they are coming through Eurotunnel between five o'clock on a Friday and seven o'clock on a Monday morning, that is when there is least enforcement, and that is when they will come in.

It is slightly easier on the other routes, say from Ireland, because obviously you have only got certain ferries going from Belfast to Cairnryan, or from Dun Laoghaire into Holyhead, so the times are very set. But when you have an open Eurotunnel and Dover/Folkestone ferries coming over there, it is much more difficult, and they will very quickly change their methods of bringing dogs in to avoid enforcement.

Q103 **Geraint Davies:** My understanding is that, although we have these three agencies—the Animal and Plant Health Agency, trading standards and Border Force—in practice they leave it to Eurotunnel and the ferries to do a lot of the checks, and a lot of them are not done. We have seen a 50% increase in the number of dogs in 2020, and the Committee has been



HOUSE OF COMMONS

provided with data suggesting that these dogs cost about £1,900 on average and can be up to £3,000. As you say, there are enormous profits here, and there seems to be an open door to smuggling. Is that right?

David Bowles: Yes. Under covid-19 restrictions, we essentially found that the market was working in a very bad way. People were under lockdown and they understandably wanted dogs for companionship and exercise; therefore, they looked to get those dogs. The market could not satisfy that demand in the UK and dog prices doubled, so they then went overseas. Dog imports from places such as Romania doubled last year to satisfy that demand, and a few people coming in from Romania and other countries made an awful lot of money from people's misery. Unfortunately, the RSPCA is extremely worried that we have this perfect storm of dogs being bred in poor conditions that would probably be illegal in the UK, in countries where they have not been behaviourally assessed, and coming into the UK to first-time owners. At some stage, as we go out of lockdown, those dogs will start to be abandoned. That, for us, is a real worry.

Q104 **Geraint Davies:** On that point—this is something we were asking Zac Goldsmith—in your estimation, how many dogs have been put down or killed by local authorities since Christmas because people wanted a dog but could not afford to keep it because coronavirus and all the rest of it means that people are short of money? Have you got any estimates on how many dogs have been allowed into the country, because of inadequate border control, and have subsequently been killed?

David Bowles: In terms of being killed, I do not think there is the evidence that there has been a rise in local authorities euthanising dogs, although Paula might have better data than we do. In terms of what the rescues are saying, 13% of the 120 animal rescue organisations that were surveyed in the ADCH survey in January said that they had seen an increase in dogs being abandoned. That was up from 3% the previous May. Certainly, the time when dogs are starting to be abandoned has increased. The RSPCA saw a 25% increase in the number of dogs that we picked up in March compared with February.

It is really interesting that the priority months, when we saw an increase in the number of dogs coming into the RSPCA because they had been abandoned or not treated properly, were October and March. Those coincided with when lockdown restrictions were eased, and I think there is a real correlation going on here. We have this perfect storm where we have had poor enforcement, and the traders have essentially been allowed to have carte blanche and to get away with bringing dogs over and giving them to people who are possibly first-time buyers. I fear those dogs will be abandoned later on, and the rescue organisations like Cats Protection, RSPCA and Dogs Trust will be left to pick up the pieces.

Q105 **Geraint Davies:** To be clear about this, you say there has been a 25% increase in the number of abandoned dogs, partly due to the lack of border controls and people smuggling dogs. How many dogs are we actually talking about here? How many are abandoned?



HOUSE OF COMMONS

David Bowles: There are no collated, unified figures on how many dogs are abandoned. The data that I have just given you is RSPCA data on the dogs that we have collected that have been abandoned, or the dogs that we have collected from people. There are no centrally held figures on the number of dogs abandoned.

Q106 **Geraint Davies:** Paula, perhaps you would like to comment on the treatment of dogs and answer the question: who let the dogs in? The fact is that if trading standards are not operating controls for the Government over the weekend, people will obviously smuggle dogs. My understanding is that there is a real problem with the training of people who look at these dogs to assess how old they are and whether they are under age. Would you like to comment on the size of the problem we face? Minimally, I presume you would agree with me that trading standards should be required to work around the clock so that there is not a gap in the armour that easily allows smugglers to bring in dogs that have been cruelly treated.

Paula Boyden: To clarify, at the ports it is between Border Force and APHA. It only becomes a trading standards issue once the puppy is in the country. The post-import checks at the ports are undertaken by APHA. As you quite rightly said, the initial checking on embarkation is delegated to the carriers. We have a real concern about that, because obviously the drive for carriers is a smooth customer journey.

It is quite right that the checks are 100% checks, but they are not fit for purpose. They are very much a document and identity check. The best way I can describe it to you is that it is a bit like you or I walking through an airport with a paper bag over your head. There is no requirement to visualise the animal at all. We have shown this twice over two separate years. We have imported a toy dog into the country through the pet travel scheme successfully on five out of six occasions. The only reason it failed on the last occasion was because the microchip that we had stuck to the inside of the carrier failed. This is what we are dealing with. There is no requirement to visualise these pets. That needs to be pulled up before we start.

Like I say, trading standards act inshore, but what we would really like to see is an independent inspectorate at the port. As you rightly say, we know that they will come in in the wee small hours when there is not 24/7 cover.

One thing I would say is that we know there has been extra resource down at Dover over the past few months, and that has shown in the number of puppies that have been seized as a result of it. In terms of the seizures, David mentioned the increased costs being charged for puppies, and as a result of that we have seen more puppies actually being reclaimed through quarantine. Certainly in the early days, over 90% of puppies were abandoned because the importers did not want to pay the quarantine costs. In the last few months we have seen a change in the breeds coming through. The puppies have been younger, with poorer health conditions,



HOUSE OF COMMONS

and more of them have been reclaimed because of those enormous profits to be made.

Geraint Davies: I see—

Chair: Sorry, Geraint, you are actually stealing everybody's questions.

Geraint Davies: I am not. I have the last question, so I can't be, Chair. I am covering the area that you haven't covered.

Chair: There are more questions left to answer.

Geraint Davies: If I could just do that without being interrupted all the time—

Chair: Sorry, Geraint. No, please. I am not being funny now. Look, there are other questions. We have not finished the questions. You are not on to question 10 yet.

Geraint Davies: But this is the last question, isn't it?

Chair: No, it's not.

Geraint Davies: It is.

Chair: No. We have got the rest of questions 8 and 9 to do before we get to you.

Geraint Davies: Sorry. I thought I was on question 10 and you were calling me for that.

Chair: I thought you wanted a supplementary. That is where—

Geraint Davies: No, I didn't. I said at the start—

Chair: Okay, right. You finish yours and then I will go back to the rest. So you finish off, then. Go on.

Geraint Davies: Paula, we have been told that no additional finance has been provided over the last five years. Now you are seeing the beginning of some coming in, but we have still got the problem of the carriers having to do the inspections and the authorities doing only documentation checks and trading standards not doing it on weekends.

Mrs Murray: On a point of order, Chair, isn't this straying into my question?

Chair: This is the trouble, Geraint. You have really taken on everybody's questions here. I have got to allow others to come in.

Geraint Davies: I am talking about the relationship between APHA and Border Force—question 10. I am sorry; I thought you were calling me at the appropriate time, for question 10, which I am asking.

Chair: But you are crossing into everybody else's questions. Can't we



HOUSE OF COMMONS

finish and then I will let you back in again when we get to question 10, if that is all right with you, Geraint?

Q107 **Geraint Davies:** Can I simply ask Maggie to make a comment about cats, then? Is there effective co-operation between the authorities and the carriers in preventing cat smuggling?

Maggie Roberts: Obviously the number of cats that are smuggled is considerably less than dogs. I am certainly aware that often it is the carriers that do the inspections because I used to be in practice in Portsmouth, so we were always dealing with problems with the pet passports of animals that had come in there.

I think the major issue with cats in terms of increased numbers probably are cats that were born in the UK. There has been less neutering over the last year because of covid, but, rather than handing those unwanted kittens into us, they are being sold online in the UK. Some people are paying £300 for a non-pedigree kitten, but I think most of those have come from within Britain. We have not got exact data, but that is our feeling about it.

Geraint Davies: Thanks. Over to you, Chair. I will come back at the end, as you suggest. Thank you very much indeed.

Chair: Thank you, Geraint. Neil, you wanted a supplementary on question 8. I will then bring in Sheryll on question 9—and Sheryll, you can pinch the rest of question 10 from Geraint if you feel like it.

Q108 **Dr Hudson:** Thank you, Chair. This is coming back to question 8 on pet smuggling and some of the restrictions that could be brought in. Thank you to our witnesses and I must declare an interest as a vet and a part of the Dogs Trust puppy smuggling parliamentary taskforce, where we are writing to Government a lot. I wanted to declare that link with the Dogs Trust.

You mentioned that there are challenges with Brexit, in terms of the movement of animals, which we are getting through with this inquiry, but there are also opportunities to tighten up and actually close the loopholes and improve animal welfare. It has been great to get comments on the record from all of you about tick treatment, tapeworm treatment, the rabies titre, and increasing the age and the wait period.

My supplementary question is, what other recommendations could we make to Government to really improve animal welfare by tightening up the legislation? Specifically, Paula, when you were before us in November, I think it was, we heard on the record from you pretty harrowing stories of pregnant animals being shipped into the country, oftentimes freshly whelped, and potentially coming in with suture wounds as well. What recommendations can we make to the Government to tighten up and stop that cruel trade in pregnant animals being shipped, but also to stop other cruel processes, such as where animals are imported with cropped ears, and that side of things? What opportunities can the UK now seize upon to improve welfare? I want to get on the



HOUSE OF COMMONS

record what we can do to improve things.

Paula Boyden: First, as you know, pre-EU exit we were bound by EC 1/2005, relating to the welfare of animals in transport. There has been a recent review of that, but regrettably that has very much focused on food-producing animals; dogs are mentioned a little bit in it, but they are not very well covered. One thing we could consider doing is introducing a really good, robust framework around travel conditions for dogs and cats.

Sitting alongside that is pregnant mums. So far, we have had 48 pregnant mums come into our care. They have given birth to 250 puppies, of which 42 have died. That is a much greater proportion than the puppies in general that have come into our care and have sadly not made it. It is illegal to transport a mum in the last 10% of her pregnancy unless you are going to a vet for treatment. Maybe we need to think about that, particularly for these long-distance journeys. We know from our own investigations that the average transport time to the UK from those key central and eastern European countries is 22 to 33 hours. One has to question whether it is appropriate to transport a heavily pregnant mum that sort of distance. We should really be looking at whether we should drop that for long distance journeys, to try to preserve the welfare of the mums.

Q109 **Dr Hudson:** Could I just get you to clarify something for our inquiry? That last 10% of gestation is very difficult to assess and quantify. What can the Government do to prevent heavily pregnant animals from being transported? That 10% is very hard to adjudicate.

Paula Boyden: It is; you are absolutely right. Perhaps it needs to be as robust as not transporting them if they are pregnant, or at least not after the first half of gestation. It probably needs to be that robust to have a significant impact. One thing that we have faced before is that we have had pregnant mums seized, but they have not been in their last 10%, so we have actually had to give them back to the importers. They have already had horrific journeys.

The other things that I will touch on while we are talking about pregnant mums, because it is quite pertinent, is the disease side of things. Neil, you will be aware of the CVO's letter in *Veterinary Record* at the end of February regarding brucella canis, which is becoming a real issue because it is zoonotic. It has a real impact. We have started testing any pregnant mums that come into us for brucella because the biggest risk is around those birth fluids. That is something that we perhaps need to deal with separately.

You are absolutely right on the cropped and docked dogs as well. We know that, between 2019 and 2020, the number of cropped and docked dogs seized at the port went up by 178%, from 63 dogs to 175. That may be a relatively low number, but those are only the ones that we know about. Cropping of ears is a mutilation, and it is illegal not only in the UK but right across Europe, but it is still happening. A ban on the importation of cropped and docked dogs would certainly be welcome, in terms of animal



HOUSE OF COMMONS

welfare. Over a period of time, it would mean that it would actually be, by default, illegal to own a cropped dog in the UK.

Q110 Dr Hudson: That's really helpful. Thank you. You will have seen that ear cropping is mentioned in the animal welfare document that the Government have published. It would be really helpful if you could perhaps follow up in writing with clear recommendations. I know you will have done that already in your written submission, but we would like some very punchy take-home messages about tick treatment, tapeworm, brucella, babesiosis and leishmaniasis—that side of things—on which we can then make clear recommendations. Mentioning pregnant animals and ear cropping adds weight to our independent report, which can say in an informed way to Government, "Look, we can use this opportunity to improve animal welfare."

You mentioned that we talked about the numbers of animals per person. When the BVA were before us in November, they actually talked about the number of animals per consignment or per vehicle. Can you put on record your comments on that? That is potentially another area that could be strengthened.

Paula Boyden: I would completely agree with per consignment rather than per person. Again, we know that, historically, some of the illegal transporters will pick up foot passengers to qualify them to bring in even more puppies. Somebody driving a vehicle picks up two foot passengers. At the moment, they are allowed to bring in 15 dogs rather than five, so I would completely endorse that.

David Bowles: Two quick points. One is on dogs with cropped ears. The RSPCA is very concerned about this. We have had a 237% increase in reports of dogs with cropped ears, and this is not just an issue of dogs coming in—obviously, that is legal at the moment, but we would hope that the Government will close that loophole. This is also a question of people doing it here in the UK. Only two weeks ago, the RSPCA took a successful prosecution against somebody that took their dogs not to a vet, but to a private person who cropped their ears without anaesthetic. It is a growing phase. Unfortunately, it is driven by celebrities. I am sure you are all aware of the "Love Island" people and the Little Mix singers who have dogs with cropped ears. These sorts of celebrities are driving that whole process forward. Having a ban on imports of dogs with cropped ears would replicate the ban that we have had here since 2006, and I think it would reverse the trend that we are starting to see with celebrities.

Another point is on the third-party ban in England. Obviously, the Committee recommended that, and we got that in April last year. Unfortunately, England was the first country to do that. We have now been joined, thankfully, by Scotland and Wales, and possibly Northern Ireland will do that. The Welsh and Scottish third-party bans are much better than the English ones, because either they close the loophole on the licensing of sanctuaries, or they close the loophole that you have to get the dog not only from the breeder, but from the breeder's premises, which is what Wales is doing. Unfortunately, the English law says that you have to get it



HOUSE OF COMMONS

from the breeder. Of course, what all the Romanians do is say, “Yes, I’m the breeder,” and that is why the legislation has not really been enforced properly. It came in a month after lockdown happened, but it has not been at all effective at stopping the import and illegal sale of dogs. I know that that is law that we have had for only a year, but looking at what has happened in Scotland and Wales, they have done rather better.

Dr Hudson: Thank you. That is really helpful, David. Laws that are brought in can always be improved, and I think that evidence will help us make recommendations to have joined-up thinking across the United Kingdom, because we all feel the same way about how we look after animals. Thank you, Chair, for your indulgence yet again.

Maggie Roberts: Can I just add something? It is an opportunity, and I would wholeheartedly agree that we should not allow the importation of ear-cropped dogs, but we could also not allow cats that have been declawed to come in. It is not a massive problem, but I worry when we start to see these things happening. We see a few coming in from America, but it is not common. But it would be a good opportunity to do that and, as I mentioned before, to have legislation on cat breeding. As David was saying about dogs, it would be about acquiring them from the breeders themselves at their premises.

Dr Hudson: Thank you, Maggie. Sorry for cutting you off there. I think it is brilliant to get the additional feline points in, and we can put that in our report. Quite rightly, there is a lot of focus on puppies—that is a lot of the volume of traffic—but we cannot ignore the welfare of other animals that are suffering as well. If we can add cats and other animals into our report, that is all for the good.

Chair: Neil, I am already being told off for writing the report before we are finished, so I will tell you off for that as well.

It was a very good point. Declawing is a fashion. People don’t realise sometimes the animal welfare implications, as with the ears on dogs and all sorts of things. It is all about what is being done to the animal in order to make it fashionable. We must be very strict on that. Thank you for that very good evidence, as Neil said.

Sheryll, will you open up on question 9? Dave Doogan will also come in and, then, dare I bring Geraint back on question 10? Over to you, Sheryll.

Q111 **Mrs Murray:** First, Chair, I need to declare an interest. I am going to put it from the cat’s perspective. I am the chairman of the all-party parliamentary group on cats, and I am, of course, the servant to two cats.

Before I go into the question, I am thinking about vaccinations against rabies. If we insisted that we waited longer if a vaccination had taken place, it would have an impact on older animals being brought into the country as well. Do you have any views on that?



HOUSE OF COMMONS

Maggie Roberts: I think it will probably be a disincentive to people who were perhaps bringing in kittens and older cats—street cats. Obviously, if it is someone's existing pet, hopefully if they knew they were coming back to Britain, they would be organised enough to get it done well in time. When pet passports were first introduced, we were telling all the clients to make sure they were starting the process months in advance. I think it would be very helpful. At the moment, if people want to bring a street cat back from Greece, they can just stay an extra three weeks and bring them back. If it was three months, that would be a disincentive.

I know that a lot of people think that they are doing the right thing by bringing street cats back, but these cats are not well socialised and are not used to living in a house and so on; it is causing a lot of stress. The money that is spent could be spent on neutering projects locally if people really wanted to help. Yes, I think it would have a positive benefit to welfare.

Mrs Murray: David and Paula, do you have a view on that?

David Bowles: I agree with Maggie.

Paula Boyden: I absolutely agree with Maggie. In an ideal world, international rehoming would not be necessary. Sadly, we know there are some organisations that are making money out of this, rather than focusing on the welfare of the dogs. As Maggie says, that increased wait period will manage that a little better, because those people wanting to make a lot of money are not going to be prepared to hold a dog for three months, so I think there are benefits.

The other thing we ought to be thinking about is whether we should be starting to look to screen for some of these non-endemic diseases. The wait period would facilitate that.

Q112 **Mrs Murray:** DEFRA told us that all non-commercial cats, dogs and ferrets entering Great Britain undergo 100% documentary and identity checks. Does that reflect your experience?

Maggie Roberts: The simple answer is no it does not—particularly not my experience when I was in practice. We had quite a lot of clients who took their dogs away for weekends and things like that—we were on the coast. Many of them would say they were not checked, and they would get a bit cross as to why they had had to pay for all the paperwork if it wasn't even going to be looked at, so that is certainly not my experience.

David Bowles: When I read the DEFRA evidence to the Committee, I did raise my eyebrows when I read that sentence. I think they are being a little bit disingenuous.

Paula has mentioned that the ferry company or Eurotunnel does 100% of checks, but, as she very well said, that is pretty meaningless. What the RSPCA has found is that you have got dogs either being imported illegally—that is, smuggled in car boots—or being imported legally but not being checked and then being rehomed without any of the disease checks happening, because APHA has not been doing those checks at the final



HOUSE OF COMMONS

destination. So it has been a bit open season, particularly under coronavirus restrictions.

Mrs Murray: Paula, do you have anything to add?

Paula Boyden: I totally agree that, even if they undertake the checks of the documents and identity, when they do not even require a visualisation of the animal—we were able to import a toy dog into the country on a number of occasions—those are just not fit for purpose. Until that is addressed, illegal imports of under-age puppies into the country will continue.

As David has alluded to, we need to look at the commercial side as well, because there are no checks at the port. The checks take place at the point of destination, which means that an importer could easily drop a load of dogs up the M1 corridor before they get to their point of destination.

Mrs Murray: Thank you very much. Chairman, I know we are running short of time, so I will pass over to Dave Doogan, if that's okay.

Dave Doogan: I will be very brief as well, Chair. Actually, our witnesses have sufficiently dealt with Sheryll's question, but I did have a supplementary from a previous question—

Chair: Carry on, Dave.

Q113 **Dave Doogan:** The question is for Maggie, who identified—obviously correctly—that there is a regulation now in Scotland covering cat breeders. I think you indicated, Maggie, that it would be your ambition to see that read across to the English jurisdiction as well. Do you think that legislation could come across largely unamended, as it is quite straightforward and proving to be quite effective? Do you think that should be a priority?

Maggie Roberts: Obviously, it is about to come in in Scotland; it isn't actually in, yet. I think that it is September that it is probably coming in.

Q114 **Dave Doogan:** I think it covers rabbits as well, doesn't it?

Maggie Roberts: Yes, rabbits as well. Obviously, it is if an owner has three litters in a year in total, so that might be from more than one cat. I think that would be adequate, because obviously we know that about 70% of litters are accidental. With people having one litter of kittens, most of the time they don't even know the cat is pregnant until there are some kittens under the sofa.

We wouldn't want to be draconian about it, but I think that if there are three litters a year, then people are deliberately doing it, and often are then selling them online for quite considerable sums, even with moggy kittens now. So, yes, I think it would be great if that could happen in England and Wales, and Northern Ireland, too.

Q115 **Dave Doogan:** Just to take away from that, then, the limit of three litters leaves room for margin for error, mishaps and unfortunate



HOUSE OF COMMONS

circumstances?

Maggie Roberts: Yes.

Q116 **Dave Doogan:** But three or more is more than accidental?

Maggie Roberts: Yes, absolutely.

Dave Doogan: That's super. Thank you, Chair. I will leave it at that.

Q117 **Chair:** Thank you, Dave and Sheryll, for those questions. Just before I bring Geraint back in, I just wanted to say that what is coming over loud and clear from all three of you witnesses is that however good or bad the rules may be, the one thing we really lack is a check and balance, isn't it, and also out-of-hours checking and visual checks? I am just wondering whether you would add to what you have said, in that not only do we need to tighten the rules but we need to apply the rules that we have got. It's no good DEFRA coming up with very complacent claims when, largely, it's paper, isn't it—a paper trail and not a proper trail? It has largely been aired, but I just wondered whether you wanted to reinforce anything on that.

David Bowles: The next three months will be interesting, Chair, because we have got three new pieces of legislation coming into force. We have got sentencing, which obviously you passed last month and which is coming into force in June. We have also all said that the punishment doesn't fit the crime at the moment, so let's see what impact five-year sentences have on the puppy trade.

In Scotland, the new rules come in on 1 September, and the third-party ban in Wales, which we think is probably the best of all three jurisdictions, comes in in the middle of September. Let's see how they all work, but as you rightly say, if all those are just pieces of paper and not enforced, we will not see any change. I refer back to the third-party ban, which came into force on 1 April 2020 in England; it has probably had a negligible impact on sales of puppies and kittens.

The challenge is, obviously, the RSPCA does not enforce animal licensing legislation—that is done by local authorities and by trading standards, but they have not had any additional budget to do that. My worry is that we have not really seen any prosecutions from local authorities on infractions under the fantastic licensing legislation that Defra introduced in 2018, let alone on the third-party ban. My plea is, if we are going to get legislation coming in, that is great, but it needs to be properly enforced, and there needs to be the proper budget to do that.

Chair: Those are very good points, thank you. Do Paula and Maggie want to make a comment, before I move back to Geraint?

Paula Boyden: I completely agree with David's comments. We need appropriate enforcement, but that includes the appropriate penalties. The absolute maximum for illegally importing a puppy would be 12 months. As I mentioned, out of 1,500 puppies, there have been two prosecutions, both of which with a monetary fine. Compare that to smuggling



cigarettes—the maximum sentence is seven years. Because of the moneys being made at the moment—the average price of a puppy has doubled in recent months and it is not uncommon to see adverts for puppies being sold for £3,000, £4,000, £5,000—until you have a proper deterrent, people will chance their arm. There needs to be the enforcement down at the ports to stop those activities happening. One of the challenges that I know APHA down at the ports has is that, coming off the Eurotunnel, you are straight on to the motorway. There has to be a co-ordinated effort to stop somebody coming off the Eurotunnel, if some intel has been passed over the water.

Q118 **Chair:** Thank you, Paula. The trade is so lucrative now. Unfortunately, for the criminal element, the more lucrative it is, the more attractive it becomes, especially if the penalties or the enforcement are not there. We are beginning to get some better penalties, but as you have all said, we have to enforce it as well. Neil Hudson has been telling us what we are going to put in the report, but we might put that in the report as well.

Maggie Roberts: I agree totally with what David and Paula have said. The only thing I would say, which I mentioned before, is that when it comes to the animals coming into the country, we need to do random checks as well as checking those declaring. Most people declaring will be coming in legally or pretty close to legally, but the ones that really are not will not be declaring. But of course, that takes resource. That really is a reflection of what has been said already.

Chair: You are right about random checks, and some that are out of hours as well, so people do not think that they will come through on the weekend and it will be fine, or at certain times there will be no one about. We need to switch around. We do not need actually to look at everybody and everything that comes in, but if you have enough spot checks, people will worry that they might be caught, especially if the penalties get higher, which should be a deterrent. That is what we need to enforce. Thank you all for reinforcing that.

I very nervously pass over to Geraint. Please, Geraint, not too long if you can help it.

Q119 **Geraint Davies:** I do apologise. Can I ask a couple of quick questions—I won't go over all the same old stuff. David, how serious is the issue of disease control? Obviously, we have had things such as mad cow disease and coronavirus from bats. Is there a concern that an open door for dogs may give rise to disease problems in the dog population or even further afield?

David Bowles: I am slightly reluctant to answer, because the other two witnesses are vets and I am not—they are far more expert than I am. Yes, we are starting to see dog diseases that we have never seen before, such as distemper and brucellosis, and Maggie mentioned Echinococcus. Yes, that is a real worry, not just to the dog population here but, because some of those are zoonotic, to the human population as well. Paula and Maggie,



as vets, will probably be better able to give you a much more technical discussion about that.

Q120 Geraint Davies: To a certain extent, there is an open door to bringing over puppies and other animals, but although we know that people can get a five-year sentence, is there a case for on-the-spot fines for people who smuggle or even fines for people who receive illegal dogs? Should there then be better licensing and documentation, so that people are required to have more care—before they hand over their money—that these are legitimate dogs and that, if they buy illegal dogs, they will be fined themselves?

David Bowles: One of the things that Defra talked about in its action plan was fixed penalty notices. In your previous session, that was brought in on horses and I think it works quite well on the equine side. The RSPCA would be supportive of having fixed penalty notices and on-the-spot fines for these issues.

We are dealing with the old sentencing rules, but we have found that we prosecute puppy dealers who have been earning £2 million or £3 million a year, and they go to prison for 10 weeks. They are still puppy dealing in prison and, when they come out, they immediately start up again. We have to get that balance of deterrence right. At the moment, if you are earning £3 million a year, the reason why you are dealing puppies is not because you like puppies, but because you are earning £3 million a year. You will go on to something else if the deterrents are much stronger. That is where you have to hit them.

Q121 Geraint Davies: For instance, there could be asset seizure, as occurs with other criminals. Anyway, I will move on. Briefly, Paula, did you want to make a veterinary point about the problems of disease control with uncontrolled dogs arriving, not properly checked and being smuggled?

Paula Boyden: Absolutely. As I mentioned at the start, the worry is that a lot of folks think, “I have complied with the rules of pet travel, therefore my pet is safe”, whether travelling illegally or not. However, we find diseases in Europe that we do not have in the UK, two in particular.

One is brucellosis, *Brucella canis*. *Brucella abortus*, which is the form of brucellosis found in cattle, is notifiable in the UK. *Brucella canis* has now been upgraded to be reportable in the UK, because it is zoonotic—so you and I can get it. The primary recommendation in countries where they have *Brucella canis* is euthanasia, because of the risk of it being spread, primarily though fluids associated with reproduction but also though other bodily fluids—urine and such like—or you have to make sure that the dog does not come into contact with other dogs. There is obviously a risk to immuno-compromised people.

The other disease that we are seeing more and more of is leishmaniasis. That is potentially zoonotic, because at the moment we do not have the sandfly vector in the UK. Having said that, there have now been documented cases of dog-to-dog transmission in the UK, where the recipient dog has not left our shores. We do not have the vector, so how

has that happened? The possibilities are through either a bite or a fight with the infected dog, but we absolutely cannot rule out whether the disease has adapted to a different vector. We really need to be mindful of that, and it warrants conversation—whether we ought to be considering disease screening prior to importation.

Q122 **Geraint Davies:** Should there be greater penalties, fixed penalties or penalties for owners as well as smugglers?

Paula Boyden: On penalties, the maximum penalty for illegal importation is just a year, because it is not an animal welfare offence per se, so it is really low and the chances are that the penalty will be much lower than that, so yes, I think they need to be looked at. On fixed penalties, I would endorse those, but if they sit alongside seizure of assets, particularly immediate seizure of puppies. We have been dealing with the puppy pilot for the past five years, and I cannot tell you how heart-breaking it is to provide care for puppies and pregnant mums only to have to hand them back. As I said, with the seized puppies, more and more we have seen the importers paying the quarantine and claiming the puppies back, because there is still a profit to be made—despite the fact that they are paying quarantine—because of the increased prices. Denying them those puppies would be welcome.

Q123 **Geraint Davies:** Maggie, finally, have you got anything to say about disease or extra penalties?

Maggie Roberts: In terms of disease, generally it is a less of a problem with cats than with dogs, although there are still quite a few diseases with which cats can be sub-clinically affected. There are things like babesia, and they can carry leishmaniasis. Obviously, I mentioned Echinococcus—the tapeworm that causes very serious zoonosis. It is important that we are treating them for the carrying vectors and screening them when they come in.

The other thing, which touches on what Paula was saying about sandflies, is that there are some types of ticks that we do not have in the UK that can be serious vectors. With global warming, there is concern that, even if a cat is not particularly infected, it could be carrying a tick into the country that could then go on to other animals. It is likely that more of these ticks will survive. There have been some recorded cases of dogs that have not left the UK and have been seen with ticks that are not normally found in the UK. We just have to be aware of all these changes that are going on globally. We should be properly treating all cats and dogs with parasitic treatments and doing screening if they are coming into this country—particularly street animals that may not be in great bodily condition and may never have had parasite control before.

We need to be using penalties that really mean something. On-the-spot fines, unless they are massive, are probably not a great deterrent to people who are going to make thousands and thousands of pounds, particularly with puppy smuggling, so I think custodial sentences have to be the way forward. I think it is quite hard on potential new owners if they



HOUSE OF COMMONS

are fined, because these people are often really clever and very misleading to owners. It is more about getting the people who are actually doing it.

Geraint Davies: The main thing is having an impenetrable wall through universal enforcement and perhaps getting the carriers more involved with more investment and training, and then punishing the people behind it hardest. I will leave it there, Chair.

Chair: Thank you very much, all three of you, for a great session. It has come over loud and clear. It is a little bit—dare I say it?—like drug dealing and drug taking. It is very much a case of let's get at the dealers—let's get at these people who are actually importing these puppies illegally and then mis-selling them. There is a lot that we need to do. We must shake Defra out of their complacency, and work all together to try to deliver a system that not only changes the rules but enforces them. That has come over loud and clear this afternoon.

If there are any final points, when you go away today, that you think you might have missed for us, please do not hesitate to give them to us in writing. You can tell that all the Members are really interested in this subject. We have asked you good questions and you have given us very good answers. Thank you very much, Maggie, Paula and David, for being with us this afternoon.