

Environment, Food and Rural Affairs Committee

Oral evidence: Puppy Smuggling, HC 54

Wednesday 23 October 2019

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[Watch the meeting](#)

Members present: Neil Parish; Alan Brown; Mrs Sheryll Murray; David Simpson; Angela Smith.

Questions 1 - 86

Witnesses

I: Paula Boyden, Veterinary Director, Dogs Trust; Robert Quest, Enforcement Officer, City of London Corporation; Daniella Dos Santos, President, British Veterinary Association; Ian Briggs, Chief Inspector, RSPCA Special Operations Unit.

Written evidence from witnesses:

- [Dogs Trust](#)
- [City of London Corporation](#)
- [British Veterinary Association](#)
- [RSPCA](#)

Examination of witnesses

Witnesses: Paula Boyden, Robert Quest, Daniella Dos Santos and Ian Briggs.

Q1 Chair: Good morning. Thank you very much for attending our first session on puppy smuggling and how we can reduce it—and hopefully one day eradicate it. Daniella, can you start, please? Just introduce yourselves across the panel, and we will start straight away with the session. Thank you.

Daniella Dos Santos: My name is Daniella Dos Santos. I am the president of the British Veterinary Association, but also a small-animal vet in practice in Kent.

Ian Briggs: Morning. My name is Ian Briggs and I am a chief inspector with the RSPCA Special Operations Unit, which is a team tasked with investigating organised animal crime.

Paula Boyden: Good morning. I am Paula Boyden; I am veterinary director at Dogs Trust.

Robert Quest: Good morning. I am Rob Quest, City of London Corporation. We deal with imported animals throughout the Greater London area and also Heathrow.

Q2 Chair: Thank you very much. This morning, I will start with a very broad question. We are looking into what is actually happening at the moment; then one of the roles of the Select Committee is also to look at ways and ideas of stopping or making the situation better. We can put them to Government. Therefore, we are not only analysing what is happening, but also looking for ideas this morning. The illegal puppy trade takes various forms. Could you briefly outline the different ways puppies are currently being smuggled across the border?

Paula Boyden: As you know, Dogs Trust has been working with the APHA and Kent trading standards since the end of 2015. We are basically underwriting the quarantine costs for any illegally imported puppies to allow them to be quarantined and responsibly rehomed, if the importers do not cover the quarantine costs.

We know that this area has evolved over the past few years, and the one thing I would emphasise is that the importers are very quick at modifying their tactics as things change. When the rules of pet travel changed in 2012, it opened the door for people to import puppies at 15 weeks, when previously the minimum age was 10 months. We found very quickly that puppies were coming in at much younger ages. The passports were declaring they were 15 weeks, when they were significantly younger than that. We have had puppies as young as four weeks come into our care.

Q3 Chair: Would they have been brought in under the passport scheme?



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Paula Boyden: Yes, they had passports and they were declared. One of the big challenges we have is that the checks at the ports are so-called document and identity checks, so there is no requirement to visualise the animal. It is a bit like you or me going through Heathrow with a paper bag over our head. We have demonstrated this on a number of occasions by importing a toy dog without it being identified as not a living animal. That is how poor these checks are.

An individual can bring up to five dogs, and we have said on numerous occasions that most people would not be importing five dogs for themselves. Research tells us that over 95% of dog owners have one, two or three dogs, and by far the majority have only one dog. The tactics have changed to people bringing in two or three dogs. We have also seen, from our most recent investigations, vets of mainland European countries advising our investigators not to declare the puppies at all, but truly to smuggle them, and basically offering to sell them sedatives.

Q4 **Chair:** Going back to the five puppies that come in under the pet passport scheme, the issue is that they should theoretically be for you, the individual, but there are no checks and balances after they are brought in, as to what has happened to those puppies.

Paula Boyden: No. Equally, there is no logging at all. We would really like to see logging of the microchip numbers as those animals come into the country. There are no GDPR issues there. Knowing that an animal with a particular number came in on a particular date starts to give us a little traceability. Particularly if there were an outbreak of disease, it would help us, as both a welfare organisation and a veterinary profession.

Q5 **Chair:** The point you make is interesting because, for all the controversy of animals being exported and imported live, they would have to have passports and to be identified as well. It is interesting that puppies are being brought in with no identification, other than being under a licence to bring in five puppies, but there are no checks on those numbers.

Paula Boyden: No, not at all. This is one of the truly sad things. One of your questions will naturally be how many puppies are coming in, and we do not know, because even basic information, such as the age of the animal, is not recorded. Sadly, in my opinion, Defra took a retrograde step back in 2016, as it no longer requires the source country of the animal to be recorded, which was quite helpful for us.

Q6 **Chair:** This is probably a difficult question to answer. Overall, the number of puppies being smuggled in is a big number. Do you believe that more are coming in under false pretences under the pet passport scheme than are smuggled, or is the number similar? Do you have any idea?

Paula Boyden: My suspicion at the moment is that most coming in are being illegally declared under the Pet Travel Scheme, rather than truly being smuggled. We have seen very few truly smuggled individuals but, having said that, the processes and procedures are not in place at ports to start looking for these individuals.



As part of our consultation response, we started to explore whether we should be looking at dogs, for example, to identify hidden puppies and whether there are any imaging techniques that could be used to identify these puppies. A few puppies do not take up a huge amount of room. This is something that we do not know enough about but, if the rules change, we would be concerned that we may see more smuggled individuals.

Q7 Chair: Bringing in Ian now, one of the other issues with bringing in puppies, who should be 12 weeks, is that it is not always easy for those on the borders to have the expertise to know how old those puppies are. What experience do you have of that?

Ian Briggs: It is extremely difficult. The operations we have carried out on the Welsh ports for dogs coming in from Ireland have always been done in an organised and planned way, with veterinary surgeons on site, so we had expertise to look at the dogs and give what they thought were their average ages. If the Border Force inspection intercepts a shipment of dogs, it has difficulties straight away, because it does not have that expertise. A smuggler bringing in dogs will do it after 5 pm, in the small hours, when they know that the chance of an interception by a local authority officer or even Border Force is much more remote.

Lots of the vehicles that we intercepted in Holyhead were out-and-out smugglers. We had vans with dogs hidden behind bales of sawdust shavings or in the back of scrap vehicles. You are talking of large numbers of dogs deliberately being brought in with absolutely no documentation at all. They were only discovered because we happened to be there and we were exchanging intelligence with the Dublin society. Working alongside Border Force, we were able to intercept them. We cannot say how many are missing but, because we were there, we were able to intercept those shipments and get them examined by a veterinary surgeon, who could give us the age. On a day-to-day basis, it is very difficult.

Q8 Chair: In the Republic of Ireland and Ireland generally, there are still a lot of big puppy farms and puppy breeders. In your view, do the majority of puppies that come into this country come from Ireland? They come from the rest of Europe as well, but would as many as half come in from Ireland?

Ian Briggs: Historically, the largest importer of dogs into the UK was Ireland. The increase of dogs from eastern Europe now tends to overshadow the Irish side, and there has also been a reduction in Ireland because of more proactive licensing and inspections.

The problem over in Ireland is that dogs are treated as an agricultural commodity and they are still regularly traded here. We have had an impact on the dogs coming in from Southern Ireland by doing these proactive operations at the ports but, as Paula alluded to earlier, all the transporters have done is to change their MO. They are now shipping



dogs from Southern Ireland to Northern Ireland and bringing them across from Belfast so, to all intents and purposes, they have become UK dogs, which makes our life much more difficult.

Q9 Chair: From the BVA's point of view, do we need vets at the ports, veterinary nurses or whoever, who are to a degree trained to identify the age of puppies? What do we actually need? Otherwise, we will carry on wringing our hands and very little will happen.

Daniella Dos Santos: It is worth highlighting that, even at 12 weeks of age, a vet might find it difficult to age a small puppy accurately. You already have that challenge. For smaller breeds in particular, even the veterinary professionals find it difficult. It would be useful for enforcement officers to have some form of veterinary training to help them age these puppies. If we were to extend the waiting time post-rabies vaccination, so that the youngest these puppies could come in was 24 weeks, it would be helpful across the board—not just for the veterinary professionals, but for the enforcement officers to age the puppies correctly.

Q10 Angela Smith: Can I ask the panel to comment on the trade once puppies have been illegally smuggled into the UK? As I understand it, there is a fairly complex supply chain involved and a lot of money is being made on the back of this illegal trade. Am I correct in thinking that?

Paula Boyden: Yes, absolutely. It is something that we still do not know enough about. We are aware that a lot of these puppies are advertised online, which is why we need to look more widely to ensure we have traceability of all puppies in the UK. We have licensing now that means that anybody breeding three or more litters needs to be licensed, but we strongly recommend that anybody selling puppies is at least registered. It should not be a burden, but then you have that traceability, and the registration or licence number could be a mandatory part of the advertisement.

You are absolutely right: these are well-set-up routes. We know that a lot of the individuals will have a stooge mum, so a mum of the same breed who is nothing to do with the puppy, so they can pass them off as home-bred. One of the other key things we have seen recently is an increase in pregnant mums being brought into the country. We have now had 17 pregnant mums come into our care. Of those, 14 were this year, so this is a new and emerging trend that gets around the rule: "You must leave the puppy with its mum". These are well-established routes, and they will adapt their methods depending on the legislation.

Ian Briggs: We have seen that the breeder will arrange for the dogs to be imported into the country, by a third-party transporter. They will bring them into the country and, once they have come through the port of entry, they will have predesignated drop-off points, where they will stop and meet the buyers of the dogs. One vehicle could have anything up to



90 puppies on board. They could have multiple stops where they will meet different sellers, or one stop where all the sellers will congregate to collect the dogs from them. They are then spread around the country.

Q11 **Angela Smith:** So it is very well organised.

Ian Briggs: Absolutely.

Q12 **Angela Smith:** Am I correct in assuming that the Inland Revenue is looking at some of these supply chains?

Ian Briggs: Yes, it is. It is massive from a hidden income or revenue point of view, so HMRC is actively looking at this trade as a whole.

Angela Smith: I wanted to get that on the record, Chair, because it is really important.

Q13 **Chair:** These are commercial transactions. They are basically commercial traders, and they are theoretically coming in legally. Is that right?

Ian Briggs: It is a mixture. Those coming in through Belfast port are type 2 authorised vehicles. On the face of it, they will have all the correct documentation. What this does not address is doctored passports or anything like that. Equally, as we said, under the pet passport scheme you can bring in five dogs per person. We have received information about postbuses coming in from eastern Europe, which have three passengers on board accompanied by 15 puppies, which are distributed very quickly upon entry into the country.

Paula Boyden: Clearly they should be travelling under the Balai directive. If you are moving a dog for the sole purpose of change of ownership, the law is clear that they should be travelling under the Balai directive, rather than the Pet Travel Scheme. Even if the passport is genuine, they are still acting illegally.

Q14 **Chair:** I suppose you cannot ask these questions, but surely an individual bringing in five puppies ought to be asked, "Where do you live and can you possibly look after five puppies?" Three people in a vehicle with 15 puppies are likely to be smuggling those puppies in, albeit legally, theoretically. Under the pet passport scheme, can you ask individuals any questions as to their purpose for these puppies? If you enter a country, very often you are asked why you are entering that country. Surely questions should be asked as to why these puppies are coming in.

Robert Quest: It is very difficult, because the legislation is about intention. You may say, "It is my intention to keep them", but, once you are in, you can change your mind. There is nothing within the law to stop you changing your mind half an hour after coming in. It is very difficult.

Chair: That is true.

Q15 **Angela Smith:** I want to move on now to the gap between demand for puppies in the UK and the numbers we are breeding domestically. Can I



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ask Paula in particular, but any of you, for your best estimate of the gap between demand and breeding rates, here in the UK?

Paula Boyden: As I have mentioned previously, we do not have definitive numbers, because we do not have full traceability. As a back-of-the-envelope calculation, we have about 9 million dogs in the UK. These are figures from the Pet Food Manufacturing Association, which does a survey every year. Even if there is an element of error, it is consistent error.

If you take the average lifespan of a dog to be 12 years, we need about 750,000 dogs per year to maintain that population. We know that the Kennel Club registers about 250,000 dogs. We also know from our own research, and other organisations have done similar research, that about 65,000 puppies come from licensed breeders. Even if you took them as separate, and the chances are there is going to be a bit of overlap, you are still looking at over 450,000 puppies where we do not know where they have come from. Some will be from legally unlicensed breeders, i.e. people breeding fewer than three litters per year, some from illegal breeders within the UK, so-called puppy farms, and then whatever is coming in both from mainland Europe and Ireland. We do not know the definitive figures, but that is the ballpark.

Angela Smith: On that basis, it seems critical, if we are to reduce the problem related to the breeding of puppies, that we have a better understanding of the number of puppies brought bred each year in the UK.

Paula Boyden: We absolutely need that traceability.

Q16 **Angela Smith:** It is traceability, exactly. How do we do that?

Paula Boyden: As you suggested earlier, we already have the legislation, so that anybody breeding three or more litters per year must be licensed. We would strongly recommend that anybody selling or producing fewer than three litters is registered. It should not be an enormous burden, but you start to get that traceability, particularly if, as part of that, anybody advertising a puppy for sale must produce either their registration or their licence number on that advert. Then you start to get a bit of traceability coming in.

Robert Quest: That would help us as enforcers, as well, because it is very difficult for us to get the evidence that they are breeding more than three litters. If there was a registration scheme as well as licensing, it would give us that evidence quite easily. It would be much easier for us as enforcers.

Q17 **Angela Smith:** If we are going to tackle puppy smuggling, we have to reduce demand for importation, which means breeding more puppies domestically in the UK. Is that potentially a way forward? Do we need to start to change attitudes towards large-scale breeding? I do not like the term "puppy farm", because it encourages an image of a large establishment that fails to breed the puppies properly and to the



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appropriate standards. I would challenge that slightly, and I wonder if the panel can comment on this. We may have to accept that we need to breed more of our puppies here in the UK, and that we need to change our attitudes towards that question.

Daniella Dos Santos: There are a couple of things there. Yes, we have a demand. We need to acknowledge we have a demand and think about how we can meet it. It would be sensible to start having a conversation around larger-scale puppy breeding and how it can be done responsibly. We need to look at the bigger picture, as well. The BVA's voice survey shows that most of the dogs that we suspect are illegally imported are the so-called designer breeds or cross-breeds. There is a societal influence there that is pushing up demand for certain breeds—pugs, French bulldogs, dachshunds and things like that.

Yes, we need to meet that demand, but also to address cultural and societal issues. We need to start encouraging responsible pet ownership and to start discussing not being able to just purchase these dogs on a whim, but being able to figure out if a breed is suitable for your environment. Is your environment, work life and personal life suitable for a dog, full stop? There is a wider discussion to be had there.

Ian Briggs: As Daniella says, public demand for these types of dogs is based on getting them as young and cute-looking as possible. If you increase the importation age of puppies into the country, you take away that factor, which steers the public back towards buying home-grown puppies.

Q18 **Chair:** To ask a slightly Conservative question, if there is a demand for French bulldogs and the money is there, why do the breeders not breed them? The trouble is the smugglers are filling a vacuum. Why do people not take this opportunity to breed these dogs?

Daniella Dos Santos: They do. We are probably straying into a different conversation here, particularly with brachycephalic and other dogs. There is a huge demand for them and there has been an increase in their breeding in this country, which has come with associated health risks. I would not want to see the encouragement of breeding these particular dogs just to meet a societal demand.

Q19 **Chair:** Do not get me wrong; I do not mean breeding any old how, but breeding properly. There is a demand for these dogs. Are you saying that breeders are taking up the challenge, to a degree, but not quickly enough?

Daniella Dos Santos: It comes back to Angela's comment that we need to have a sensible conversation about how we can meet the demand, at the same time ensuring that decisions being made by prospective buyers are responsible decisions. Again, increasing the wait time to 24 weeks takes away the possibility of buying that puppy on a whim. It forces a potential owner to think more carefully about the particular breed of dog and their lifestyle. It is putting in that extra step.



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Q20 Chair: I was looking at the figures: 10 years ago, Labradors were No. 1. Now they are No. 5. My dog is still suffering from shock to realise that he has gone down to No. 5, when he thought he was No. 1. It is interesting how dramatic the change in what people buy has been.

Ian Briggs: It is convenience as well. Anything that we do has to be coupled with continued publicity and education for the public. When people decide, as a family, to buy a dog, and they are sat around a computer, the easiest thing for them to do is to go on one of the free ad sites, and they can get that dog the next day. We are directing them towards a respectable home-grown dog from a reputable breeder. There is a delay in that. When they are looking on the internet, deciding which dog to buy, they have already committed to buying the dog. They do not want to go and build a relationship with the breeder, then have a delay, or wait for a litter to be born. Everything that we expect them to do is against what they want to do.

Q21 Chair: It is instant demand through the internet.

Paula Boyden: One area to be mindful of, particularly with third-party sales legislation coming into effect next April, is a potential loophole of puppies being brought in under the auspices of rescue. That needs to be addressed because, in that situation, there will be no mum.

Chair: We have a question on that later, Paula, so we will deal with it then.

Q22 Alan Brown: Paula, this is aimed at you and, to an extent, you have already touched on it, but the Dogs Trust is one of the organisations that have suggested a mandatory registration scheme that would cover breeders, owners and sellers. You have already mentioned it, but how would it work in practice?

Paula Boyden: It would be mandatory registration of breeders, so that we have traceability. At the moment, anybody producing three or more litters has to be licensed with a local authority. We would like to see anybody selling fewer than three litters being registered. I anticipate it would be a central database, so that everybody is issued with a registration licence, which then goes on to the advert, so there is traceability.

We have spoken about HMRC and how a lot of people are making a lot of money from this business, without declaring it. We may start to get repeat offenders, in terms of either people or addresses. One of the other things we know is that you sometimes have three or four people at the same address, breeding just under the limit, so none of them have to be registered. Then we start to get that traceability.

Q23 Alan Brown: It would only be for sellers and breeders, and would not extend to owners.

Paula Boyden: No, it would not.



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Q24 Alan Brown: You are saying it would give some visibility, which I accept, but earlier you said that 750,000 puppies per year need to be bred to maintain the stable population of dogs for which there is a demand. We do not know where 450,000 puppies come from, and that is a huge number. If registration starts to give that traceability, how will that data be processed and analysed, and how will people keep on top of it? There is a huge work volume, to try to drill into that visibility. If there are no more powers and no more people looking at that, I imagine it would not take us much further down the line.

Paula Boyden: It is a significant workload. I am not an IT expert, but one would hope that drilling down and pulling the data should be done relatively easily, for example in looking for common themes.

With my Pet Advertising Advisory Group hat on, we are starting to see this in some of the online adverts already. With databases, external individuals are looking for common themes, for example common telephone numbers, which would suggest somebody is selling on more than one occasion. If you are registering, you would be giving an address, so we are starting to see that traceability. It is not a failsafe, but it is a lot better than what we have at the moment, because we do not know where the majority of puppies in the UK have come from.

Q25 Alan Brown: Would you expect some of that analysis work to be done by third-sector organisations or should local authorities be doing a lot more of it?

Paula Boyden: A central database would have to be done by the local authority, so that everybody is feeding into it. There are various means by which an analysis can be undertaken. The Pet Advertising Advisory Group has been working with a chap called Keith Hinde, from an organisation called Hindsight, who has developed software to interrogate databases. Work is already starting to happen; we perhaps just need to consolidate it a bit more.

Q26 Alan Brown: In an earlier inquiry about dangerous dogs, we heard about cuts to local authorities and that type of animal welfare officer responsibility being cut as well. If we are going to do a proper registration scheme, presumably local authorities will need more money, one way or another.

Robert Quest: If I can step in here, licensing is self-funded so, if there is a fee for registration, it should also be self-funded. Registration is fairly straightforward, so it should not be a big thing.

Q27 Chair: When you say "registration", do you mean a dog licence? What do you mean?

Robert Quest: I mean a breeder's licence.

Q28 Chair: I always worry about this because, if you are not careful, you will make it more and more onerous for those who comply with the law. I am



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not convinced that those who do not intend to comply with the law will. I am not against a mandatory registration scheme, but you need to be able to police and enforce it; otherwise it will only create greater bureaucracy and will not actually stop the illegal sale of puppies. You have to get to a stage where you would not be able to sell a puppy without a proper registration. If you get to that stage, you have to be able to enforce it. How are you going to enforce this for 400,000 puppies?

Robert Quest: It makes it easier because it comes down to complaints. If a local authority received a complaint about a puppy and there was no registration number that could be traced back, you would know there had been an unregistered sale and action could be taken.

Going back to licensing, one of the Northampton districts did the first prosecution under the new licensing regs for an unlicensed breeder. That happened yesterday, so it is being used. It would come back to a complaint.

Q29 **Chair:** It is the breeders who are licensed, not the individual dog.

Robert Quest: It would not be the dog. The breeder would be registered or licensed, depending on the amount of work they had done.

Q30 **Chair:** What is your take on how enforceable that would be?

Robert Quest: If we had a complaint about a particular puppy—say it got ill and there was a complaint to the local authority—we would find out where they had bought it from and if they were registered. If they were not registered, we would have a straightforward offence. If we found out that they had been selling and breeding a lot of puppies, we would have an even bigger offence under the licensing regulations. Presumably it would be a two-tier scheme.

Q31 **Angela Smith:** This is a slightly loaded question, but I am thinking through the value of having the licence number. If we had a proper scheme, there would be a number attached.

Robert Quest: There already is, yes.

Q32 **Angela Smith:** If we extend that, there is a clear message to be communicated to buyers that, unless there is a number, you should not buy.

Robert Quest: That is an easy message.

Angela Smith: It is a clear message that could be quite powerful. Is that the view of the panel? It is my view. You all agree.

Q33 **Chair:** It would also be an advantage to the legitimate licensed producer, because it would start to isolate those who are not. My main concern is that, if we did it, we would have to make sure we enforce it. Having a law just for the sake of it never works.



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Robert Quest: There is a bit of self-regulation around that as well, because people who are registered and licensed will invariably tell on the people who are not, where they hear about or know about them.

Ian Briggs: That can be coupled with a public awareness campaign, whether through PAAG or whatever. The more we make the public aware, the more they are empowered to make those checks and decide whether to buy from a particular dealer.

Chair: Could you all look forward and speak slightly more loudly? It is probably my hearing, but I do not fancy the sound to be terribly good here, this morning.

Q34 **David Simpson:** We are straying across these questions a little, but I want to recap on a number of them. We have talked about data: how robust is the data that you have for puppies being imported to the UK illegally? What needs to be done to improve it?

Paula Boyden: The data is not that robust, because of some of the challenges that we have with the system. For example, ages are not logged at all. We know that, in 2018, just over 300,000 dogs were imported into the UK, but we do not have the demographics in terms of age and where they came from. Just some simple registration when they are booked in would be very helpful. Some of those coming in under PETS are going to be genuine, but some are being brought in for onward sale. We have some coming in under Balai; that is going to change over the next few months, with the changes in legislation.

The bottom line is that we do not have really strong, robust data, but we should be able to get it with appropriate recording and, as I say, registering things such as microchip numbers when animals come into the UK, so we start to have some traceability.

Q35 **David Simpson:** The number of illegally landed dogs identified in 2018 was substantially lower than previous years. How do you explain that? Is it because there are so many puppies that there is not as much money to be made, or what?

Paula Boyden: I cannot speak for Ireland, but my suspicion from the work that we have been doing in Dover is that one of the big challenges we have is that there is not good coverage of resources at Dover. We have data on the times of day and days of the week when these puppies come in, and it is often over the weekend, in the wee small hours, when there are no resources available to implement these checks.

Q36 **David Simpson:** Those figures may not be accurate.

Paula Boyden: I would challenge the figures. They are accurate on the seizures but, in terms of numbers coming in, they are very different.

Robert Quest: I think more are using Balai, and there is no check at the border for Balai movements; they are done at destination, if at all, and



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they only do a very small percentage at destination. Some of the people who use Heathrow are flying in puppies, rather than bringing them through the ports. If we see them more than a couple of times, we will have a conversation with them and tell them, "We think you are operating commercially and you need to use Balai". We push those people to Balai. I know that has happened for some of the people at the ports as well, who are using different routes.

Q37 David Simpson: We are going to touch on the routes in a minute. Ian, how does the lack of border checks between Northern Ireland and the Republic of Ireland affect the ability to monitor the scale of illegal trade coming into the UK? There are 250 or 300 crossings on the border of Northern Ireland. Dare I mention the word "Brexit"? When and if it comes, how will it affect the overall smuggling of puppies?

Ian Briggs: It is easy for dogs to transit from Southern Ireland into the north. When we have done operations at Birkenhead and Liverpool, which were primarily set up to intercept dogs coming in from Belfast, we saw that Southern Irish transporters were coming in with shipments of dogs attached to a Northern Irish address. We strongly believed that was as a direct result of our operations at Holyhead. It is being used to circumvent the straight route from Southern Ireland into Wales. I have no idea how you enforce inspections around that.

Q38 David Simpson: It is virtually impossible. We talk about a hard border or whatever—I am not getting into that side of it—but it is impossible because you have 300 crossings. You cannot police it if it is happening after 5 pm, at 3 am or whenever. It is impossible. It is the same as illegal tobacco or fuel smuggling on the border; it is very difficult to do. I do not know how you will manage it. How successful has Operation Delphin in Scotland been?

Ian Briggs: Operation Delphin is basically a conglomerate of all the SPCAs, so the RSPCA, the SSPCA and others. It is a working party that looks at ways of tackling the trade between Ireland and the UK, as a whole. As a result, the SSPCA deals with it in a particular way, because it has delegated powers at Cairnryan. The RSPCA does not, and we work collaboratively with Border Force and the local authorities on the Welsh ports.

From our point of view, this has been successful in that we have caused the dealers to change the way they bring dogs into the country. It has put them on the back foot. We have made a number of interceptions, which have resulted in dogs being returned to Ireland. I cannot speak exactly for the SSPCA, but I know it has done the same. As a working group, it has raised the profile of the trade as a whole, the issues around it and the difficulties we are all facing in trying to police this. It has enabled us to look at it from a partnership perspective. No one organisation can tackle this on its own; there need to be both statutory agencies and the third sector tackling this, but we can do it



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collaboratively. We have made real inroads to having a positive impact on this particular trade.

- Q39 **David Simpson:** Lastly, in regards to puppies that are sent back, puppies that are found in lorries or vans that are illegally smuggled, which you catch, what happens to them?

Ian Briggs: When we do any of our port operations, we have an arrangement with either the Dublin society or the Irish society that they will take receipt of any returned dogs. The dogs are intercepted; they are given a full veterinary examination; and then, with the co-operation of the ferry companies, because they are not landed at the point where they are intercepted, we are able to turn them around and send them back to Ireland. Invariably, the transporter basically walks away from the shipment of dogs. They will just disclaim ownership of them. They are handed over and we hand them to the Irish charities, which will then rehome them.

- Q40 **David Simpson:** Is it inevitable that, because of the numbers, they will possibly be put down?

Ian Briggs: Ultimately, as we often see with these types of dogs, if there is a dog that starts exhibiting serious medical conditions, it could result in that dog being put to sleep. For those that we have returned to Ireland, the Irish societies have had real success in rehoming them quickly.

- Q41 **Mrs Murray:** Can I drill down on cross-border trade? How can border controls for pet transport be improved to clamp down on illegal puppy smuggling? What improvements would each of you envisage?

Ian Briggs: It is very difficult. We have a positive working relationship with UK Border Force. In any operation we have done, they have always been extremely helpful. They have helped when they can, but they have other priorities that cause a strain on their manpower. It is not a check that they can do all the time and, again, restrictions in local authority budgets prohibit them from being present at the ports, other than for planned operations.

- Q42 **Mrs Murray:** Do you also work with port police? I am thinking about the port police in Dover or Tilbury.

Ian Briggs: I have not personally worked with Dover. Dover presents its own challenges, because of the volume of traffic that comes through.

Mrs Murray: They have their own police force.

Ian Briggs: Yes, they do. We have worked with port police in Liverpool and in some of the Welsh ports. Again, wherever we have gone, the police, Border Force and special branch have always been more than co-operative.

Paula Boyden: We have done a lot of work at Dover and there are a few challenges there. One is, as I have mentioned, the lack of resources and



having permanent cover. For animals coming in from mainland Europe, checks are undertaken by the carriers. We feel this should be addressed. From a carrier's perspective, their primary aim is the passage of the passenger as quickly as possible, so they have a smooth journey. Perhaps we can have a team of people dedicated to doing those checks, using some of the moneys paid to transport those animals, so that they are proper checks.

Daniella has mentioned perhaps having individuals who are trained to age these puppies, so that we can do those checks. One of the other challenges we have in the east of England is in the way Eurotunnel is set up. When one comes off Eurotunnel, one goes straight down the ramp and on to the motorway, so the checks need to be done in France, rather than on this side, which means that we need a collaborative approach.

We also need to relook at those checks, because there are no visual checks at all at the moment; we have shown that with the importation of a toy dog. We also need some penalties. The penalties are just not there to deter this. If you are caught illegally importing a puppy, the worst you could expect is three months' imprisonment. Compare that to smuggling cigarettes, where you are potentially looking at up to seven years' imprisonment.

On the amount of money that can be made from this, I will just use a ballpark we have used in one of our reports. If you have 20 breeding mums, we know you are not going to abide by the law and breed only once per year. If you have two litters per year and we take a small litter size of, say, four puppies, suddenly you are turning over £80,000 per year and the worst you get is three months' imprisonment. There is absolutely no deterrent. You may lose the odd litter but, as Ian has said, we have found that, in well over 90% of the cases we have dealt with, the transporters just walk away. Unless there is a deterrent, we are not going to get on top of this problem.

Ian Briggs: I alluded to a transporter that was intercepted at Holyhead, with a number of dogs hidden behind sawdust bales. We valued that shipment on its own at about £60,000, and they just walked away.

Robert Quest: There is a difference at airports. Commercial consignments coming in from third countries are checked at airports by the Animal and Plant Health Agency and vets. If they are non-commercial movements, they are checked by PETS checkers, who are independent of the airlines, like us at Heathrow and likewise at Gatwick, Manchester and in Scotland. There is a legal requirement for 100% checks. We have freight-only for imports, which means you cannot lose them. The only exception for that is assistance animals, which can come in the cabin.

Q43 **Mrs Murray:** Why are so few illegal puppy smugglers convicted? You have mentioned resources. Do you think there are any other reasons?



Paula Boyden: Part of it is down to the penalties or lack of them. In the 1,000-plus puppies that we have dealt with, we have had two prosecutions. It requires a lot of resource to prosecute somebody who is basically going to shrug their shoulders and continue their activities. There are going to be challenges with chains of evidence, as well, but there is almost no incentive to prosecute. It is not going to stop an individual from continuing this behaviour, because there is so much money to be made from it.

Robert Quest: The other issue arises once they are in, when we come across illegal imports, which are referred to us by the vets. Someone has bought the puppy that was brought in illegally, usually because it is underage. The vet will ring us: "We have a puppy here. It has a passport. It is not 15 weeks". We will go and deal with that, so we have the end user, but that is not the person who needs prosecuting. "Who did you buy it off?" "He was called Pete and here is his phone number". They are burner phones and you can never get back to the dealers. That is one of the reasons why trading standards does not take many prosecutions.

Q44 **Mrs Murray:** How could you improve that?

Paula Boyden: It is twofold. One is the checks taking place, because we are not intercepting all the illegal imports.

Robert Quest: It is traceability as well.

Paula Boyden: Yes, we have to have traceability. We also need robust measures to deal with these individuals. We have spoken previously about whether on-the-spot fines are appropriate to act as a deterrent in some cases. If you are making in excess of £100,000 per year, on a regular basis—and that is tax-free, so think how much you would have to earn if you were paying tax—three months in prison is not going to be a deterrent.

Robert Quest: We were involved in something called Operation Bloodhound in Kent. One of the things we wanted then, because you can do it, is to seize the vehicle. If you can seize the vehicle being used for the illegal activity, it is a massive deterrent. That was considered not appropriate, but it is allowable.

Daniella Dos Santos: The BVA's numbers show that about 30% of vets have seen puppies that they are concerned have been illegally imported. As has been alluded to, by the time they get to the vets, they are with the end user, the new owners. The new owners are often very reluctant to confront the fact that their puppy has been imported illegally and the emotion of potentially facing losing their puppy.

The problems are twofold. Traceability is really important. From personal experience, a lot of these puppies will come in with foreign microchips that are not even registered on a UK database, so we have no way of going backwards. Also, when vets report, they are left with this: "It is



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already in the country; there is nothing we can do now". It is about enforcement.

Q45 **Chair:** How can we make sure that those microchips that come in are on our database?

Daniella Dos Santos: There are two separate things. Paula might be talking about something separate, about GDPR and registration on entry. There is a different conversation to be had about microchipping, and the fact that we have multiple databases in this country, which makes it difficult to trace any dog. A single, unifying database would make the whole situation much easier.

Paula Boyden: The laws of pet travel only require a pet to be microchipped. There is no requirement to be registered on a database, which is a flaw in the legislation.

Chair: So that needs to be changed.

Mrs Murray: That needs to be looked at, does it not?

Robert Quest: The microchipping regs in the UK are that you must register on a UK database within 30 days of coming into the country.

Chair: We are finding that, for a lot of the puppies found, even in this country, those microchips are still not up to date, even if they have them. We can tighten up on the databases and either have one or at least have them all co-operating and talking to each another. At the moment, they seem to go off in splendid isolation.

Q46 **Mrs Murray:** Have you had conversations with organisations similar to yours in other countries to see if there is a positive response to having a unified database?

Robert Quest: I know from my experience that Italy has a national database and does not have quite the issue we do. Croatia has a really tight database; you have to be resident in the country to register a dog and you must register it. People cannot come in and get Croatian passports if they do not live in the country and have residency.

Hungary has a good database, and we deal with the Hungarians for obvious reasons; they send a lot of puppies here. We can contact their central competent authority, and they will come back to us when the passport is issued and the vaccinations done, so they have really good detail in their databases. There are other member states that have really tight databases.

Q47 **Chair:** I have one last question on this. The APHA figures for 2016 are that nearly 1,300 puppies came in illegally. In 2018, it is down to 440. Are these figures correct or are they just not detecting them? That is the issue for me because, on the face of it, the figures look like they are dropping, but I am not convinced. What is your take on it?



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Paula Boyden: Our suspicion, from our experience of the work we have been doing, is that these figures are not a true reflection of what is happening. We know that there is not good coverage at the port at the times when we know these puppies are being brought into the country. Therefore, by default, they are not being intercepted. We do not know exactly how many are truly being smuggled and, as I mentioned previously, we know that this activity is evolving. We are starting to see things like pregnant mums coming in, which is hugely worrying, particularly given the journeys they are enduring to get to the UK.

- Q48 **Chair:** At the average port, how often would an inspector be on during the day? I suppose they sometimes vary the times they are on. That would be the wise thing to do, but I imagine they are on mainly during the day time. I do not want to encourage them to come in late at night and bring even more, but do you see where I am coming from? Do we ideally need inspectors to be on all the time when vehicles are coming through the ports? You would certainly want to vary it. Is that being done?

Paula Boyden: Our experience from our work at Dover is that the cover is primarily Monday to Friday, from early morning to 8 pm or 9 pm. There are times when they do targeted cover. With current technology, it is easy to let people know if, suddenly, there is cover there. We really need cover all of the time when ferries are coming into the country.

Ian Briggs: At Welsh ports, it is only ever targeted or as the result of an incident. There is no standard coverage; they just respond to incidents.

- Q49 **Chair:** There is a lot more to be done there. This is a slightly bizarre question. A sheep gets different teeth as it gets older. Perhaps this is for the BVA. Is there any way that you could technically tell the age of a puppy?

Daniella Dos Santos: It comes down to my earlier comment about increasing the wait time post-rabies vaccination. That will take it up to 24 weeks, by which point change in dentition will at least have started and will often be well on the way. If you look as young as 12 weeks, sometimes they may have started changing their dentition; sometimes they may not.

Once they have their full adult dentition, it is very difficult to tell a young adult from a middle-aged adult. As they get older, they get more decayed teeth and it is easier. I would not say it is quite as simple as for a sheep, but the extended wait time would make dentition checks far easier. In providing veterinary training to the enforcement officers, that would be a useful thing to highlight.

- Q50 **Chair:** Paula, you spoke quite rightly about needing stronger sentencing. If we finally got five-year sentencing for animal cruelty, would the courts be able to prosecute with higher sentences or would we need a change in the law? What is your view?



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Paula Boyden: We would need a change in the law, because higher sentencing is for animal welfare offences, whereas this is being prosecuted under a different piece of legislation. You already alluded to HMRC and, particularly in a lot of cases that the RS deals with, often people are prosecuted for tax evasion, because the penalties are greater. That is a very sad place to be so, yes, we would need a change.

Q51 **Chair:** They could be prosecuted under different rules as well, for breaking the rules of registration, if we tighten them up. That might almost be a better way. I am always nervous about trying to get the law changed, because it takes so long, but let us look at that very carefully.

Ian Briggs: You have three elements of the trade. You have the breeder, who then passes it on to a transporter, which is what we have been talking about. Those guys will stop at the ports. Unless there are serious welfare issues on the vehicle, which are very difficult to identify at that time, they are then passed on to the seller. We get involved at the end user point, where we are seeing the increase of fraud and other offences, because of the way they are marketing these dogs. The welfare issues the dogs have from the source are manifesting as these people are selling them. Increased sentencing results at that point.

Chair: It would make the database, microchipping and everything tight, so that you could prosecute on that ground. Otherwise, you would not be able to prosecute; that is the trouble.

Angela Smith: I forgot to declare interests, Chair; I should have done that at the beginning. I am an honorary life member of the BVA.

Chair: A number of us are, I think, so we will all declare it now.

Angela Smith: I am also Chair of the All-Party Parliamentary Group for Animal Welfare. Dogs Trust and the RSPCA are on the advisory board, so I ought to declare that as well.

Chair: David and I are members.

Mrs Murray: I am a member of the All-Party Parliamentary Group for Animal Welfare.

Q52 **Angela Smith:** It was just to get that on the record. How would tougher controls on pet travel, if we leave the European Union, affect those who travel responsibly with their pets? This is a balance between effectively cracking down on illegal trade and avoiding making travel with pets too onerous. I am just asking about the balance.

Paula Boyden: One thing we need to factor in here—and I appreciate we are talking about puppy smuggling—is the importation of adult dogs for rehoming. One of the big challenges with that is the diseases that we are now encountering in the UK, as a result. When I am answering, it takes that into consideration as well.



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There are diseases that we find in mainland Europe that we do not have in the UK, but we are starting to see them emerging. For example, we are seeing cases of Leishmania, Babesia and Ehrlichia. We also know that at the moment the biggest source of distemper, which is a disease that we generally vaccinate against in the UK, is dogs coming in from Romania, which have not been vaccinated.

In terms of how we would change the rules, as Daniella has said, an increase in the wait time post-rabies vaccination would tie it in with the incubation period of the disease. Most cases will present between three and 12 weeks post-infection, not in that initial three weeks. We would like to see a return of the rabies serology, and there are two reasons for that. One is that, pre-2012, we have 12 years of serology data. We know that the one group of individuals that respond less well than others is young puppies. The data sheets at the same time said, if you are vaccinating a young naive individual, i.e. a puppy under six months, you give a primary course of two doses, not one, which we do not have any more.

Equally, there have been a couple of papers published over the past couple of years—one from Norway and one from Finland—looking at home-bred dogs and their rabies titres versus imported dogs. There have been significant differences in the level of their rabies protection, so there are good reasons to think about reintroducing that rabies blood test. That would be a longer wait, but we suggest a 12-week wait post the rabies serology. We already have mandatory tapeworm treatment and would suggest reducing the time interval of that, because we know some people are circumventing it at the moment, and a reintroduction of mandatory tick treatment.

Daniella Dos Santos: Your question was about balance. I completely agree with Paula's recommendations, but, on that initial serology blood test, providing that the booster vaccinations were kept updated afterwards, it would be that initial wait. It would require initial planning if people were intending to move regularly with their dogs, but that would be the initial thought process. As Paula alludes to, the three-week wait time has no relevance to the incubation period at the moment.

On the other aspects, we want to see tapeworm treatment for dogs and cats, but also a shortened window, as Paula has mentioned. There is something particular, called *Echinococcus multilocularis*, which is a tapeworm. As it stands, with the current window, a dog could easily be treated in the UK, go to France for the weekend, come back and not require a second treatment.

If that tapeworm is picked up and comes into the country, it can affect people, but the incubation in people is 10 to 15 years and the disease can be fatal in humans. By the time we know it is in the country, it is too late. So there is a human health aspect to tightening up here. We have seen two confirmed cases of Leishmania being transmitted to dogs in the UK with no history of travel. Therefore, there is a risk to our UK dog



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population, if we do not tighten up on disease testing before they come into the country from countries that have diseases we do not.

- Q53 **Angela Smith:** This was the second part of my question. I remember, four or five years ago at the animal welfare group, Professor Crispin raised serious concerns about the impact of the relaxation of the scheme on not just animal health, but public health in the long term. You are both indicating that that risk has increased. Paula is indicating that we are beginning to see the emergence of evidence of diseases now entering the UK dog population. Is that being measured at all, because it seems important for animal and public health that we should be measuring the emergence of these diseases in the UK dog population?

Daniella Dos Santos: The BVA would like a more robust surveillance system in place for small animals. We have a decent one for larger animals, but not so much for smaller animals, so there is an issue there. We have good examples. I gave the example of the Leishmania cases, and we know that there are tick-borne diseases, particularly in Essex, which did not originate in the UK. We suspect they have come from a dog that has travelled to Europe. On human health, I do not know if we have any evidence of transmission yet but, as I say with EM, for example, it could be years before we know there is a problem.

- Q54 **Angela Smith:** Perhaps we could have written evidence on how to best measure and track this issue.

Chair: How can we tighten up in the future?

Angela Smith: How we could tighten up is really important.

Paula Boyden: There was a government scheme called DACTARI, which unfortunately is no longer in existence. It required vets to report, rather than allowing laboratories. But we have good surveillance systems now, in things such as the SAVNET and VetCompass projects.

I agree with Daniella that we need a more robust system. To take the Leishmania cases that Daniella mentioned, when they were reported, the assumption was that they resulted from a bite or fight between the infected dog and the uninfected dog. Leishmania is normally transmitted via a vector called a sandfly, but we cannot completely rule out that it has adapted to another vector, particularly with our changing environment. If that happens, it puts us in a different world, because it is potentially zoonotic.

This is not about scaremongering, but just trying to horizon-scan to see what is happening. Our own dog population is naive to these diseases and, therefore, when we do see them, quite often we see the more severe side as a result.

Robert Quest: I want to take you back to the first part of the question about the balance between bona fide people and the illegal movement. We have concerns about that, too. We see a lot of people coming in from



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the States. UK plc wants to encourage top-class individuals coming in, and about 80% of people from the USA are coming in to work in this country—at universities, banks, insurance companies and things like that—with their families and dogs. I know Daniella says they need to plan, but it is amazing how little planning they do. To put off those sorts of people would have an impact. We have a pre-check scheme, where we want them to send their paperwork 72 hours before they leave, but they cannot even do that; sometimes they have not even booked 72 hours ahead, so they are not very good at pre-planning. We have concerns about that.

Going back to the science, we would support a minimum age for commercial consignments of six months, because that gets to the nub of the issue. These illegal consignments should be moved as commercial. There is knock-on, if you bring back the serology and wait, to countries such as the USA, Australia and New Zealand, where there is no scientific basis, if they are rabies-free and they have good veterinary controls. There is also some evidence I was discussing with Paula yesterday that, if you get a titre response from the vaccination, it will only be from the vaccination and never from the wild-type rabies. They will not have rabies if they have the serology, unless the animal is already exhibiting symptoms. I suggest you get evidence from your specialist at Weybridge and Public Health England, as well.

Q55 Angela Smith: I understand what you are saying, Robert, but I would challenge it slightly, because we all know that, at borders, there are strict regulations relating to bringing seeds and foods into the country. We know these rules. Anybody coming into this country from the US or Australia will know those rules as well, so why should those rules not apply to regulations relating to bringing pets into the country?

Robert Quest: Australia has never had terrestrial rabies and New Zealand does not even have bat rabies. Why would you require serology and a wait of four months after that? It goes back to whether you use the science to indicate something or you just take an across-the-board approach.

Q56 Angela Smith: Perhaps we could have a varied scheme.

Robert Quest: If you ban the commercial import of dogs under six months, it targets the issue.

Q57 Angela Smith: The problem is it would not for Europe.

Robert Quest: Not all of Europe has rabies either. There is that question.

Paula Boyden: We are starting to see, for example, puppies that have Romanian or Hungarian passports, but have actually come from Serbia or Ukraine, which are unlisted third countries. This is where the origin of some of these animals starts to get quite murky.



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Ian Briggs: As Paula says, we did an operation in Lincolnshire regarding an organisation bringing in eastern European street dogs, of various ages. A large percentage of those dogs, which ended up with the Dogs Trust and the RSPCA, tested for things such as Leishmania.

Robert Quest: Again, they would be commercial consignments.

Daniella Dos Santos: We have heard today that there is a blurred line between a commercial consignment and not, and people are using loopholes to bring in dogs under the pet passport scheme, when they should be coming in under Balai. We have to be aware of that when we are saying they are commercial consignments or not; there are blurred lines out there, even if there should not be.

The BVA's stance on disease risk is about the individual country. We need to look at the origin country and what diseases we should be testing for, when they come in. As has been alluded to, all of this also relates to adult rescue dogs. A huge number of rescue dogs are now coming in from eastern Europe, for example. If we were to tighten up on the rules altogether, not only would it help with puppy smuggling; it would help make sure that we only have dogs come in that do not pose a risk to the UK dog population.

Robert Quest: The unintended consequence where we stand is that a lot of the non-compliance we get at the moment goes into quarantine for 21 days, because then it is compliant and can go. If we bring in serology and a wait, all those that are currently in for 21 days, even from Australia, would end up in quarantine for four months.

Q58 **Angela Smith:** We have talked about disease and serology, which has an impact on the welfare of the puppies and animals. I want to ask a more general question before I finish, on the welfare of puppies illegally imported into the UK, under PETS. My understanding, from having worked with the Dogs Trust, is that this is a major concern and that many animals are being imported into the country under very bad conditions. Could we have a quick illustration of some of these issues, for the record?

Paula Boyden: To go back to our earlier investigations, we had investigators out in some of the central and eastern European countries where these puppies are coming from. They are bred in appallingly barren conditions. No attention is paid to the provenance of the parents, in terms of disease testing or inherited diseases. I have seen paperwork of a sibling mating. We have footage of one litter of puppies that was kept in a cupboard under a stair, so the only time they saw the light of day was when the door was opened.

On the actual transfer itself, a colleague sat on a vehicle: a so-called postbus, which is a vehicle carrying people and post from central and eastern Europe to the UK. The puppies are just piled on in their crates; they certainly do not comply with the regulations on the space they need. They are generally not fed because, if they are not fed, they do not



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produce anything at the other end. They are getting little water and no rest stops. These are horrific journeys. It is probably 25-plus hours just to get to the UK, before the distribution network starts. These are shocking starts to life for these little puppies.

Daniella Dos Santos: I will just highlight that the welfare issues do not stop there. The first 16 weeks of life for these puppies is their formative period, in terms of behaviour and socialisation. Often, these puppies will come through these situations and then end up with behavioural issues going forward.

Q59 **Chair:** The families have got fond of these puppies as well, and then there could be disease and behavioural problems, which we are storing up not only for the puppy, but for the people who have purchased the puppy.

Ian Briggs: We have countless statements and stories from members of the public who have purchased a dog that has undergone that journey. Within a couple of days, the children come downstairs and find the dog dead on the living room floor, or it falls ill. They are finding themselves having to put this dog through veterinary treatment, which is costing thousands of pounds. As we have said previously, the seller has gone. They have disappeared. The burner phone has gone and they are on to the next sale.

Paula Boyden: We have lost a number of puppies that have come into our care, purely because of the breeding and the conditions they have come with. I would add to Daniella's point about behaviour.

Q60 **Chair:** Perhaps Defra and others could put more on their websites about the need to trace back your puppy, to know whether it has disease and what its breeding was, but also so you have a degree of comeback on the breeder. If you buy a puppy from a van or whatever, you have none of that.

I know it sounds slightly callous but, in some ways, it is the same system as buying something without any form of guarantee. This needs to be brought home. If you bought an electrical good off the back of a van, you would not expect it to work or you would pay a lot less for it. People are often paying a lot of money for these puppies, yet they do not know their background at all. That is a good point.

Before we leave this question, somebody mentioned that some of these puppies coming from Europe probably came from outside the European Union. They might come from Serbia, Ukraine or wherever. Do you have any idea how widespread that is?

Paula Boyden: Because this is illegal activity, it is difficult to ascertain how widespread it is. We are hearing, not infrequently now, of such puppies. If they are seized, you are talking about a four-month quarantine. Going back to behaviour, that escalates any concerns. We have real concerns about whether we should quarantine a puppy for four



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months at such an important point in its lifetime. For every puppy that comes into our care through quarantine, we put extra resources into the quarantine facility, so that we can spend time with the puppies.

- Q61 **Chair:** I know that before Poland came into the European Union the Ukrainian/Polish border was pretty open. What is the legal situation now? Can somebody from Ukraine bring a puppy into Poland legally, get a passport for it and bring it to the UK? Is there a legal loophole there or is it all illegally taken into Poland and illegally brought on?

Robert Quest: Ukraine is unlisted, so they would have to have the serology and wait. The puppy should be seven months old. Any puppies coming out of the Ukraine younger than that would not be compliant.

- Q62 **Chair:** It would have to be signed off by people in Poland, who probably were not legit, if it was signed off at all.

Paula Boyden: There are two things happening. Either they are moved across the border and then issued with an EU passport, or the EU passports make their way to Serbia, so they are always travelling with an EU passport. We have seen many times, sadly, members of my own profession falsifying documentation, and that continues.

Robert Quest: It is not just a UK issue. Colleagues in other member states have the same problem with dogs from third countries ending up with EU passports. It is quite common.

- Q63 **Chair:** Those countries might have particular diseases as well, which again is a risk.

Robert Quest: It goes back to your thing about supply, demand and price. The price has gone up in some of the EU member states that are producing puppies, but it is still low in countries such as Serbia.

Chair: It becomes more profitable to get them in.

- Q64 **David Simpson:** Are you concerned that the ban on third-party sales will cause sales of puppies to increase?

Paula Boyden: The challenge with a ban on third-party sales is that it is not a stand-alone piece of legislation. Whether we are talking specifically about the UK or about pet travel, we need other legislation to support it. I mentioned earlier that one concern we have is puppies being brought in under the auspices of rescue. Therefore, you do not need to see the puppy with its mum. There is nothing to stop that happening.

We are already seeing a significant increase in the number of pregnant mums coming through. Again, travelling a mum in the late stages of her pregnancy is not ideal. Like I say, we have had 14 this year already. We have two or three ready to whelp in our care at the moment. The individuals are adapting to the legislation coming in and that is a big concern.



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The ban on third-party sale is important and we see the merit in it; however, there are loopholes around it at the moment. Sitting alongside that is the lack of traceability that we have already discussed.

Q65 David Simpson: How is online purchasing monitored and how do you differentiate between those who are legitimate and those who are not?

Paula Boyden: It is really difficult. I will put on my Pet Advertising Advisory Group hat on for a moment. This is why we would like to see a process of both licensing and registration, with a mandatory requirement to have your registration or licence number on that advert. We have worked with a number of online advertisers to adhere to PAAG's minimum standards, but it is a voluntary scheme.

There are two challenges to that. One is that, if we push them too hard, they will throw up their hands and walk away. We will just be left with perhaps the less honourable online sites. We have also discussed whether we can just ban advertising online, but obviously we only have jurisdiction within the UK. You would find all these sites just popping up outside the UK. We really have to work with the sites, rather than against them.

Q66 David Simpson: I appreciate that. How do you staff this all? How do you monitor online, when you have border checks and smuggling? How is this managed? It is impossible to cover every angle, but how is this managed?

Paula Boyden: Within PAAG, we have had volunteers moderating before. Some of the sites are very good at taking down inappropriate adverts, if they are advertising banned breeds, pregnant mums or whatever.

I mentioned an individual called Keith Hinde, who runs an organisation called Hindsight. He has developed some software that can scrutinise sites electronically, rather than manually. That is the way to go, as you rightly say, to try to alleviate the huge manpower that would otherwise be required for these activities.

Q67 David Simpson: Robert, this is my last question. You have suggested that there are loopholes within the new legislation. How can they be closed or plugged?

Robert Quest: Defra is working on licensing rescue centres, which is the only way to close that loophole, but it is the scope of what you mean by "rescue centre". You have a person rescuing a few cats or dogs in their house, the big organisations sat here and everything in between. It is a big piece of work for Defra to manage that.

Chair: Most people are genuine, but a few will not be.

Robert Quest: We know that these rescue organisations that bring in dogs from abroad make a tremendous amount of money, whereas Mrs



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Smith—sorry—down the road is probably spending her own money, so she is making nothing and subsidising. These other organisations make a fortune and are not doing it very well.

Q68 Chair: I will not say Mrs Smith again, but there are genuine people out there who spend a lot of money looking after stray animals. They do it with the very best of intentions and they do it well. We have to be careful that, in trying to get the criminal element, we do not stop people doing it legitimately.

Robert Quest: It is interesting scoping work for Defra to look at.

Angela Smith: My married name is not Smith, so you're all right!

Chair: What is your maiden name, then? At the end, so that you can think about it now, I will ask you a question. We will be having Ministers at the next session, so what would you like to ask the Ministers? I will give you a bit of time to think about it and ask you that as the last question. There are a couple more to come.

Q69 Alan Brown: To be fair, you have touched on this at different times, with different answers. But is there a risk that just imposing tougher controls at the border and on breeders will lead to smugglers switching to other methods, which further impacts on poorer welfare, as the smugglers try to beat the system? If so, how do we prevent that from happening?

Ian Briggs: Yes, they will adapt. This particular issue about the trade in dogs has been emerging for the last seven or eight years, and the dealers, in my experience, have changed their modus operandi throughout.

Every time we or the statutory organisations come up with a way of trying to tackle this, they will change their methods. That is the nature of crime. Our best opportunity is again to improve the checks at ports and work on the internet sales sites, as Paula has alluded to, through PAAG. The best chance we have to impact on the trade overall is to focus more on those areas. It will negate any changes they make.

Q70 Alan Brown: How will tougher checks be funded to make it a robust operation?

Ian Briggs: In the way we have done operations in the past, primarily, the RSPCA have staffed and dealt with any dogs that were seized, and provided the manpower to deal with that. The local authority has been there to provide its statutory powers on the importation side. I know that, for any of the local authorities, how they fund this sort of activity is a continuing problem, but it is important to consider. Whether there can be increases in funding for the local authorities to tackle this particular issue, I do not know.

Paula Boyden: We mentioned earlier that, at the moment, checks are undertaken by the carriers when coming through Dover/Folkestone. We



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strongly suggest that the checks are not done by the carriers, but by an independent Government agency. It is approximately £15 or £20 to bring an animal into the UK, so take off an admin fee, but those monies could potentially be used to fund that agency. It is not costing the carriers any more for those pets to come in, in a vehicle, so use some of those funds to properly fund and staff checks, so that we can have robust checks at the port. That would be a good start.

Q71 Alan Brown: I understand the logic of that and it is probably the best way of doing it, but putting increased costs on legal breeders may cause some of them to move out of the business, which then makes it more attractive for illegal breeders. Is that a further impact?

Robert Quest: It is an interesting argument. There is a counter-argument that, if it were a nominal fee, the legal people would be happy to pay it, if you took out the illegal trade that is undercutting them. That is one way of looking at it.

Q72 Chair: I understand that. How do we ring-fence the money? I was in local government and there are priorities. You can put in what money you like, but will they necessarily spend it where we want? Paula had the idea of the fee coming in; that would have to be ring-fenced, I think. That is perhaps one point we can put to the Minister.

Daniella Dos Santos: One thing not to lose sight of is the longer-term plan. I completely understand the discussions about enforcement and where funding is coming from. The Scottish Government did a campaign, "Buy a puppy safely", for example. We can educate members of the public about how they should be buying a puppy rather than using enforcement.

There are two factors to be thinking about here. A Government-led campaign like the Scottish Government did could go a long way to changing purchasing habits.

Chair: That is a good answer, Alan. You like that one.

Alan Brown: I like to hear that the Scottish Government are ahead, as always, and this definitely did not come from me.

Chair: Third-party endorsement is always better.

Q73 Angela Smith: We know that there is a strong link between wildlife crime and other forms of crime, which would largely be considered serious crime. In the work that you have done with the Border Agency, carriers and the Home Office, have you come across any evidence of a link between puppy trafficking—which is what it is—and other forms of crime, such as drugs?

Ian Briggs: Yes, we have seen links. Some of the gangs that we have dealt with in England have been involved in other forms of criminality. The trade in dogs is a much less risky business to get into than low-level



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drug-dealing. In sentencing, you are looking at a maximum of six months for any animal welfare offences. This is where sentencing under the Fraud Act comes in, as it brings with it a much greater sentence, but that is a direct reflection of the amount of money involved in the trade.

When people are making £400,000 or £500,000 per year, it brings with it the whole aspect of fraud, because the only way they can try to sell those dogs to an unwitting member of the public is by defrauding them. They generally are criminals by nature.

Q74 Angela Smith: Is there any evidence on the other kinds of crime they tend to be involved in?

Ian Briggs: We have dealt with people who have been involved in low-level drug-dealing, intimidation and violence.

Q75 Angela Smith: Of course there is fraud. The news emerged this morning that 39 people have been found dead in the back of a container lorry coming into Essex from Northern Ireland, which is shocking people trafficking. It seems to me that really we are not talking about puppy smuggling; it is puppy trafficking. It is absolutely evil.

Ian Briggs: They are a commodity. They are being trafficked across Europe as a commodity, and the sorts of people who get involved in this are involved in other crimes. Again, they have no regard for the puppies that they are bringing into the country, as equally as they have no regard for anybody else. They tend to be the sorts of people who are involved in this higher-level trade.

Angela Smith: They are involved in other kinds of illegal trade as well.

Q76 Mrs Murray: I will just turn to the demand for specific breeds. What strategies can the Government adopt to help reduce the demand for certain popular breeds of puppies, such as French bulldogs? We have seen a change in demand over the last 10 years. Are there any suggestions you can make for how we stop these popular, fashionable demands for certain breeds?

Daniella Dos Santos: The BVA has done a lot of work on this in particular, and we know that a lot of the drive comes from the use of these dogs in advertising imagery and publications. The BVA has pets in advertising guidelines, which look at not just breed, but also how you are showing these animals, in terms of their wider welfare needs, social requirements and so on.

Beyond Government, there is a wider societal piece about responsible advertising. As I mentioned before, coming back to the Scottish Government, a Government campaign on responsible puppy buying and pet ownership would go a long way to spread the word about how people should be purchasing puppies, and dogs for that matter.

Q77 Mrs Murray: Could part of the solution be to increase domestic



breeding? What are the problems with this approach, if we look at that? Could we encourage people to breed in this country, domestic breeds as well?

Daniella Dos Santos: There are two angles there. We need to look at the rescue aspect and encourage owners to consider rescuing. As I said earlier to Angela, we have to look at the fact that there is a demand for puppies. We cannot shy away from that. We need to start having sensible conversations about larger-scale breeding, as long as we meet the welfare needs of those puppies, including their behavioural and social needs. I think that will probably be the biggest challenge.

I am aware of some work being done in Purdue in the United States about larger-scale puppy breeding, and how their social needs can be met. We need to have a longer conversation. There is no clear way forward as yet.

Paula Boyden: If we are considering specific breeds, we cannot and should not demand people buy particular breeds, but we have to educate them on the challenges that perhaps come with some of these breeds. It is about responsible buying. We are looking at how we can, if we need to, increase puppy production in the UK. We also need to look at enforcement of the legislation.

There was recently a focus on puppy breeding in Wales, and what was apparent from that was the lack of enforcement. That comes down to local authority resources, again physical resources, but also making sure that they are appropriately trained. It is all very well saying you need a documented socialisation and habituation plan, but do you know what should be in that, as an enforcement officer? How do you make sure that it is being utilised and put into place? It goes wider than that, in terms of making sure of and preserving the welfare of all the animals involved, not just the puppies, but the breeding stock as well. Some of them live horrific lives and this is happening in our country.

Q78 Chair: As part of a previous inquiry, we visited a puppy farm in Wales, and one of the big problems there was that the people producing those puppies got so little for them. They go through dealers, probably in Birmingham, who then make the money. If we could only get to a situation in which proper large-scale breeding goes on, which is properly regulated with properly socialised dogs, and people go to the breeders to buy their dogs, the breeder would then get the benefit of the price.

On this particular farm, the people were not wealthy; they were struggling. The whole thing was bad for the puppy, but it was also bad for the people. All right, the puppies were being exploited, but so were the people who were breeding them.

I do not quite know how we do it, but we cannot tighten up the system to make sure that those puppy farms do not exist. At the moment, everybody is inclined to say that large-scale breeding of dogs is abhorrent. I do not think it is, but it has to be done properly. It is how we



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go from the under-resourced, under-socialised puppy farm to a larger breeding establishment. I do not know how many larger breeder establishments, done properly, there are in the country. Are there many? I do not know; I ask the question.

Paula Boyden: A number of organisations have done analysis on licensed puppy breeders. There are a few hundred. Going back to the premises that you visited, which were under-resourced, the ban on third-party sales should start to address that, because the purchaser will go directly to the point where the puppies are being bred.

Chair: That is right. That is one of the reasons we put it in.

Paula Boyden: However, it goes back to enforcement. I saw some footage from a recent investigation that had done undercover filming. They had gone to an establishment because a young lady had bought a puppy and, three days later, it had died of parvo. The proprietor welcomed them into what he called his puppy showroom, which was just a shed that he had kitted out with a tiled floor and a couple of tables. He brings the puppies to the purchaser, so they do not get to see where the puppies are being kept and the conditions they are being kept in. This is why enforcement is so important.

Rob has mentioned that licensing should be self-funded, so you get your costs back. We would ideally like to see a separate, independent animal welfare inspectorate, which is not for profit, so that welfare is always top of the list. If it is self-funded, it could achieve this, because individuals such as Rob and his team, who deal with animal welfare all the time, would know what to look for. The challenge for the local authorities quite often is that this is one of a number of responsibilities. They do not necessarily have the training and the expertise, which is no fault of theirs.

Chair: That is one of the asks for the Ministers, for a start.

Q79 **Angela Smith:** That sounds similar to the recommendation we made about training, registration and accreditation of inspectors in local authorities. Everything the panel is saying to us this morning begs a question about attitudes towards buying puppies, not just where people buy them from, but the price they are prepared to pay and the public understanding of what is involved, in terms of the ongoing cost of keeping the dog. What is your or your organisation's measurement of how well understood this is? How well understood is the cost of buying and keeping a dog?

Ian Briggs: My organisation and Paula's, and the BVA, over the last few years have continually put out information to the public about how difficult and expensive it is to own a dog, and how guarded you must be when embarking on purchasing a dog. That has continued for years. Puppy contracts have been developed and all of this advice has been given out to the public. It works to a degree.



Ultimately, we are looking to change consumer habits, because it is too easy to buy a dog at the moment. If we want people to buy locally bred dogs, it would have to be coupled with rigorous licensing and enforcement, as well as an intensive public information campaign. We have to change the attitude that you want to buy a dog as cheaply as possible, which is what the internet sites offer.

You are looking for quality, as you would for any other domestic items you buy around the house. We are diverting people to spend more time considering the purchase they are going to make and the cost around that animal, and then doing it. By making them as informed as possible, hopefully we will get them to go to a good, reputable breeder, rather than just doing an impulse buy off the internet.

Q80 Angela Smith: One would imagine the cost of keeping a dog healthy and happy is reduced if the dog is healthy, happy and socialised at the point of sale.

Ian Briggs: Absolutely, and you continually get horror stories on the internet about people falling foul of buying these dogs, the emotional trauma the family is put through because the children find it ill, and then the financial aspect of taking that dog through its veterinary treatment, until it invariably ends up dying or being put to sleep. That should get the message home to these people that you are better off spending slightly more by buying through a local reputable breeder, rather than getting a quick fix and buying off the internet straightaway.

Q81 Angela Smith: I suppose there is value in trying to incorporate the role of the insurance industry at the point of sale. It is almost as though we need a pack that informs buyers of all the advised moves they need to make, one of which is possibly pet insurance.

Ian Briggs: The puppy contract touches on that. There needs to be a real, concerted effort at pushing that document, whether through PAAG or on the internet sites at the point when people start to look at purchasing an animal. Again, it would be a collaborative approach to hammer the point home to these people that they should be looking locally.

Paula Boyden: One of the challenges we have is that it is an emotional perspective, and most people who go to see a puppy will come away with a puppy, even if they think something is wrong. You need to look at responsible buying. We need to look at intervention to try to stop people from going to see a puppy in the first place, if they think something is wrong. Even if it is wrong, people will want to save it from that situation.

I absolutely understand the reasoning behind that, but all it is doing is fuelling this trade. We need to do more about buyer behaviour and putting in some interventions, making sure they are asking the right questions and are not being pressured—"Well, you have to come and get



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it now; otherwise it will go to somebody else”—by all the tactics that the less scrupulous breeders and dealers will use.

- Q82 **Chair:** You made an interesting point about the emotional side of it. Very often, people pay perhaps £2,000 or £3,000 for a puppy. For most purchases like that, you would look for some sort of insurance to cover veterinary costs and all those things, if you think of it logically. Somehow or other, we have to get through to people to be more logical about the purchase. If you have veterinary fees, operations and all sort of things, they would be covered.

I know it has paid to insure our dog, because he had a crack in a bone in his shoulder, which needed quite a large operation that would have been a lot of money. Somehow or other, we have to get it through that, if you are taking on an animal, you will be taking on costs. If they see a lovely, fluffy puppy and the children like it, they will take it home and then think about it afterwards. We are just asking people to think about where it has come from.

I will go in reverse order now and start with Robert. We have the Ministers coming, if Parliament survives that long before a general election. What would you like us to ask the Ministers?

Robert Quest: Can we please have a single, multifunctional, quality database for dog registration, self-funded by the registration fee? I paid £18 to register my dog, I think, which is less than a bag of food.

Paula Boyden: I have two things. Can we please review the rules of pet travel to make them robust and safer for our pets and the animals being transported?

- Q83 **Chair:** Are you interested in the number of dogs in the future? At the moment, five dogs can come in under the pet passport scheme. Do you want that reduced?

Paula Boyden: Yes. We need to look at this in terms of numbers.

- Q84 **Chair:** Should it come down to two?

Paula Boyden: I think it should certainly be two or three. If you are travelling to a show, you can have an exemption, but the checking of that needs to be robust, because we can all mock up a flier on a PC. On the other side of things, both domestically and at the ports, we need to look at enforcement. Can we have a separate animal welfare inspectorate with full cost recovery? Can we look at having better enforcement at the ports to detect this and better deterrents?

Chair: Ian, you can agree with the above if you want to.

Ian Briggs: Can we enable the local authorities to effectively carry out their statutory duties at the port of entry? That will have a massive impact.

- Q85 **Chair:** It should be for longer periods, when the port is active, basically.



Daniella Dos Santos: Specifically on puppy smuggling, we want to reduce the number of illegal imports, so reduce the number per consignment under the Pet Travel Scheme. Increase the rabies waiting time, which means those dogs would be too old to be sold on as puppies. Reduce the disease risk, in testing, and tick and tapeworm treatment.

Chair: A good point made by you and others this morning was that there is a disease risk, as well as a welfare risk, not only to the puppies, but to humans. That was well made.

Q86 **Mrs Murray:** To continue with what Ian just said, I was the MP who introduced the Private Member's Bill that extended the area of operation for port police beyond one mile. Would you like to see more co-operation between the port police authorities and local authorities?

Ian Briggs: Yes. As I said previously, we cannot expect this issue to be dealt with by the local authorities alone. Everybody needs to be involved, particularly with regards to the statutory powers. Everybody needs to be involved to tackle this effectively. If we cannot work collaboratively on this, we will never address the issue.

It is my firm belief that, out of all the areas of animal crime that I investigate for the RSPCA, none is anywhere like the trade in dogs, in that we are so close to having a real, positive impact and making a positive change on the way that dogs are imported and traded around this country. This is all the more reason why we need to work on this collaboratively, keep pushing forward and keep promoting it with the public, because changes will happen.

Chair: It is getting the message out there to people as well about what they are buying. Thank you. It has been a really good panel this morning. You have been very thoughtful, which was the idea of the panel.

As I said, we will put your asks to Ministers, along with our own, and hopefully we will get some action. We do not want any puppies to be smuggled and we want to make sure that disease does not come in, people know what they are buying, dogs are properly socialised and all the points that we have made this morning.

It has been good and the panel has worked very well together. I appreciate your time. We will put a lot of these questions to Ministers, hopefully next week or the week after, depending on "Events, dear boy, events". Thank you very much.