



Department
for Environment
Food & Rural Affairs



Department
for International
Development

The Rt Hon the Lord Goldsmith of Richmond Park
Minister of State

Neil Parish MP
House of Commons
London
SW1A 0AA

10 February 2020

Dear Neil,

Thank you for your letter regarding the Environment, Food and Rural Affairs Committee inquiry into puppy smuggling which was undertaken in the last session before Parliament's dissolution.

The Government shares your concerns about puppy smuggling, and that is why we have committed to cracking down on the illegal smuggling of dogs and puppies.

Our work to date to end the trade in illegally smuggled puppies includes targeting demand for illegally imported dogs and improving enforcement. Our approach involves international engagement, tighter regulation and public communications, as well as collaboration with valuable stakeholders, including the British Veterinary Association and Dogs Trust. I am keen to build upon this with further action and my officials are currently working up options for how to take this forward. I look forward to being able to update the Committee at the appropriate time on this.

I welcome the opportunity to respond to your questions and my response provides a full explanation of the Government's position on these issues.

I would like to take this opportunity to thank the Committee and yourself for the tireless work that has been done to raise awareness of, and to scrutinise, this abhorrent practice.

I look forward to working closely with the new Committee.

With best wishes,

THE RT HON THE LORD GOLDSMITH OF RICHMOND PARK

Annex A:

1) Will the Government commit to undertaking an analysis of the demand for puppies across the UK to underpin policy making in this area?

The Government recognises the need for sound evidence to inform policy making, and we are exploring opportunities for further research into the demand for puppies in the UK.

Existing evidence such as the PDSA's 'PAW Reports' provides an estimation of the trend for dog ownership in the UK and is included below. This data demonstrates steadily increasing ownership, which in turn suggests an increasing demand for dogs.

Year	Estimated dog population	Sample size (defined as dog, cat or rabbit owners, aged 18+, living in the UK)
2019	9.9 million	5036 adults
2018	8.9 million	4639 adults
2017	9.3 million	4153 adults
2016	9.4 million	4252 adults
2015	9.3 million	5152 (with an additional 26,432 responses)
2014	8.1 million	Undefined
2013	7.8 million	Undefined
2012	8.3 million	3,956 adults
2011	8.3 million	11,261 adults

2) Would the Government support the creation of (i) a mandatory registration scheme for breeders across the UK and (ii) a new database for registered dogs?

Animal welfare requirements and the controls on dog breeding are fully devolved matters. Each administration has separate legislation controlling dog breeding. In England the Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018 require that all commercial dog breeders are licensed – that is, those that are in the business of breeding and advertising dogs for sale. People who are not businesses and who, for example, breed from their family pet once and pass on the puppies are not required to be licensed.

We share the Committee's interest in exploring creating a mandatory registration scheme, including the benefits this would provide. At the same time we would wish such a requirement to be proportionate. The Government considers that if every person who bred from their dog had to register with their Local Authority this might be disproportionate, as it would cover every household which had produced just one litter of puppies from their family dog.

A mandatory registration requirement such as this may also be challenging to enforce by local authorities. This is borne out by evidence from similar all-encompassing regimes, such as the dog licensing scheme which was abolished some years ago. Dog licensing was difficult to enforce and compliance rates were very low – less than 40% obtained a dog licence and it in effect became a list of compliant dog owners.

We are mindful that many hobby breeders pass their puppies to friends and acquaintances through existing networks, rather than through more formalised advertising routes. We would wish to consider how a registration system would cover this informal "trade" in pets.

In order to be proportionate a mandatory registration scheme should consider the welfare risks which such a scheme would address, as well as the resourcing requirements of operating the scheme and of complying with the scheme. In the case of the significant number of owners who choose to breed from their pet dog once in its lifetime, there are less likely to be welfare concerns. Local Authorities would also wish to consider where best to use their finite resources.

Operating both a registration scheme and licensing scheme as part of a dual regime could enable different schemes to be targeted at different types of breeder in a risk-based way. At the same time some possible compliance risks from having a dual regime might need to be considered. For example high volume breeders could sign up to the registration scheme and continue to breed dogs on a large scale under poor welfare conditions under the pretence of legal compliance, when in fact they ought instead to be subject to the licensing regime.

The Government suggests that the regulatory powers and resources of Local Authorities might best be focussed on higher volume and lower welfare puppy breeders, and on those breeding and selling puppies as a business, where dog welfare is more likely to be compromised. The Government is also committed to educating prospective buyers, for example, providing advice on how to identify deceitful and high volume sellers, and how to identify those importing dogs illegally.

The 2018 Regulations allow Local Authorities to give a higher star rating and a longer licence to those dog breeders that apply higher standards and have a good record of compliance. Thus, there is an inbuilt mechanism for Local Authorities to focus their effort where it is needed. The regime offers full cost recovery and provides for proportionate Local Authority enforcement.

In terms of creating a new database for registered dogs, dog owners are already required to have their dog microchipped with the keeper's details held on a microchip database. This is an important welfare measure as it allows stray and lost dogs to be reunited quickly with their owners. Defra is reviewing the controls as they currently apply in England and will consider what changes might be made to improve traceability back to the breeder.

3) Why does the Government not record the age of a dog or its country of origin on entry to the UK?

There are numerous approved routes into the UK by which pets can travel. These diverse routes are managed by independent pet checkers and by a variety of carriers including ferries, air travel and trains. Pet checkers and carriers independently record the number of how many cats, dogs, ferrets and assistance dogs have travelled and are required to record details of the animal's date of birth where non-compliance is discovered. They may also independently record identifying details for their own records.

Raw data on the number of animals travelled via each authorised pet checker or carrier is provided to the Animal and Plant Health Agency (APHA) and Border Force to enable effective enforcement action. This new system, with carrier captured data, records the number of pet animals entering the country more accurately than the previous legacy database (Pets database) which was initially deployed in 2006, but does not record the country in which the paperwork was issued or the country the animal travelled from. The throughput of pet animals was also much lower under the previous system.

4) Will the Government reduce the number of animals that can travel under PETS?

The rules on the maximum number of animals that can travel in a single non-commercial movement under the pet travel scheme are governed by the EU (Regulation 576/2013), and this will continue to be the case throughout the transition period. After the end of the transition period, the Government has no immediate plans to change our pet travel arrangements. Nevertheless, leaving the EU may open up new opportunities for managing our own pet travel arrangements, including ensuring there are robust controls on disease and animal welfare.

5) What is the Government's assessment of the number of puppies being smuggled into the UK, and how the trend has changed since the relaxation of pet travel rules in 2012?

During the written phase of the Committee we submitted evidence on the number of puppies smuggled into Great Britain. This answer is included below:

“APHA holds data on animals that are ‘illegally landed’ in Great Britain, and holds this data for 3 years. Data on illegal landings in the UK is not available because there are no border checks

on entry to Northern Ireland from the Republic of Ireland. Annex [B] sets out the numbers of puppies quarantined between 2016 and 2018, after being illegally landed in Great Britain, by country of origin.

The figures in Annex [B] include some animals that have been intentionally moved into Great Britain illegally, and also include animals that are found to be non-compliant during checks on arrival into Great Britain because of unintentional errors in pre-travel health preparations or microchip failures.”

It is worth noting that the data APHA holds does not necessarily mean the animal was smuggled into Great Britain. Landings which are prohibited and therefore illegal are set out in the Rabies (Importation of Dogs, Cats and Other Mammals) Order 1974 and include any dog, cat or ferret that is landed in Great Britain which does not meet the pet travel scheme rules/commercial import requirements and therefore requires quarantine. While these figures may include some smuggled animals, it also includes:

- Pet animals that arrive at UK airports and during the pets check are found to be non-compliant.
- Animals that are found 'inland' and, after a Trading Standards investigation, are found to be non-compliant.

In terms of how the trend has changed since 2012, APHA keeps data from the last three years. Between 2016 and 2018 there was a fall in the number of illegal landings of puppies. This could be for many reasons, amongst them:

- APHA have been continuing to work with carriers to develop their understanding of the Pet Travel Scheme rules.
- APHA have been carrying out targeted surveillance at ports.
- APHA are developing an intelligence-led approach to this work and are working with partner organisations such as HMRC and Border Force to take this forward.

6) What funding was provided to Border Force and local authorities to tackle the smuggling of domestic animals in each of the last 5 financial years?

We can confirm that no funding was provided to Border Force or local authorities specifically to tackle the smuggling of domestic animals in each of the last 5 financial years.

7) What targets or performance indicators does Border Force have for the interception of smuggled domestic animals and related issues?

As of July 2019 the Border Force has included material relating to Puppy Smuggling in a National Cooperation Agreement (NCA), which provides "a clear and consistent framework between Border Force and Defra to ensure

effective enforcement of the legislative framework governing the import of plants and animals...".

This NCA states that Border Force is: "committed to working together to reduce illegal imports of biosecurity risk material, endangered species, live animals and other plants and animal products..."

This agreement focuses on several areas, and explicitly contains "Animal health – commercial and personal imports of live (including aquatic) animals and the EU Pet Travel Scheme."

Within these arrangements the Border Force has not published formal targets or performance indicators for the interception of smuggled domestic animals and related issues.

8) Are enforcement officers adequately trained to deal with intercepted shipments and identify whether a dog is underage or not?

We recognise that the accurate ageing of a dog either side of the de facto minimum age for travel under the Pet Travel Scheme – 15 weeks of age – is difficult, as their dentition does not change at reliable time markers between six weeks and four months of age. Where carriers are uncertain, they can refer suspected non-compliances to APHA, including cases where any dog appears underage. APHA staff are highly trained to deal with intercepted shipments.

Each carrier is also subject to quality assurance checks including a minimum of one full audit per year to ensure compliance with the procedures agreed with APHA set out in the carriers' Required Method of Operation (RMOP).

APHA and Border Force are currently considering the ways that they can work together even more closely at port, including through a more strategic sharing of intelligence. A meeting between Defra's then Animal Welfare Minister and Home Office's then Immigration Minister took place in June 2019, specifically to discuss collaboration to disrupt illegal dog imports.

9) What assessment has the Government made of the effectiveness of carriers in carrying out checks and the enforcement of pet travel regulations? Would a new Government agency to monitor pet travel be more effective?

Engagement at the border with major carriers has indicated that they are committed to preventing illegal imports of pet animals, and that those that seek to abuse the rules are not their prime customers. The carriers have already instituted unilateral measures to reduce carriage of pet animals for commercial reasons. This includes P&O Ferries refusing accounts to commercial dog importers and Eurotunnel limiting the number of dogs that can be transported in one vehicle.

These carriers work closely with operational colleagues at APHA and Border Force. Observations made by APHA (during required quality assurance checks) on pet travel movements, including levels of compliance and carrier

knowledges and behaviours, show good awareness of Pet Travel Scheme rules. Government has no plans to create a new agency to monitor pet travel.

10) How do you respond to the criticism that post-import checks for commercial assignments of puppies are “inefficient” and “ineffective”?

Post-import checks are undertaken by APHA for commercial consignments of dogs imported under the Balai Directive (Directive 1992/65) and we are not aware of any evidence which suggests these checks are ineffective or inefficient.

The post-import check regime for dogs is risk-based, dependent on the disease profile of certain countries and the compliance history of the given charity/trader.

High-risk consignments are deemed to be from high-risk countries, or importers with a history of poor compliance (regardless of country of origin). APHA will subsequently check these consignments after import. However where there is a good history of compliance by a particular importer, high risk consignment checks can be reduced to 10%, matching the percentage of checks on importers from low-risk countries.

11) What is the Government's response to the suggestion that the minimum age that puppies can travel should be increased from 15 weeks to 6 months?

Such changes may have considerable impact on genuine travellers, and as such would need to be very carefully considered, at the appropriate time.

The rules on pet age have been governed by EU requirements following our harmonisation with EU pet travel rules in 2012. After the UK leaves the EU and at the end of any transition period, the Government has no immediate plans to change our pet travel arrangements. Nevertheless, leaving the EU may open up new opportunities for managing our own pet travel arrangements, including ensuring there are robust controls on disease and animal welfare.

12) Given the ongoing illegal trade and the opportunity provided by Brexit to review current pet travel regulations, what is the Government's vision for the regulation of pet travel after the UK leaves the EU?

The rules will not change during the transition period for pets entering the UK under the Pet Travel Scheme, or for commercial imports. However, whilst the Government has no immediate plans to change our pet travel arrangements, as mentioned above leaving the EU may open up new opportunities for managing our own pet travel arrangements, including ensuring there are robust controls on disease and animal welfare.

Defra is considering a number of options for increasing deterrents and targeted enforcement as part of a long-term strategy for pet travel and tackling the illegal trade.

13) Do you think increasing domestic breeding is part of the solution for tackling the unsustainable demand for puppies in the UK?

Domestic breeding, and by that we mean the breeding of dogs in this country, has always been a key source of puppies in England. That will continue to be the case and it is likely to remain so. The Kennel Club has noted that most of their registered breeders only breed from their dog once. They are working to encourage their members to meet demand for puppies in this country and reduce the reliance on, and number of, imported dogs.

14) What are the Government's plans for the public communications campaign? What funding has been committed and how many people is the campaign intended to reach?

Recent developments, including the ban on third party sellers of puppies and kittens (known as 'Lucy's Law'), identified the scope to enhance public communications, most notably around the responsible purchasing of pets. Defra recognises that raising awareness of unscrupulous sellers is an integral step towards tackling illegal supply.

In the previous Parliamentary session, Defra committed to launching a communications campaign to help people make informed choices when sourcing a new pet. This is to support 'Lucy's Law' which comes into force in April 2020. The intention is for this national campaign to reach prospective pet owners of dogs, cats, puppies and kittens. The campaign planning and development has been funded since 2018/19, with a total of £225,000 committed to date.

The campaign will raise awareness of the consequences of buying from a low-welfare seller and challenge the assumption that it is easy to spot a misleading seller. The campaign will also educate the public on best practice for finding a new pet and signpost people to the resources available to help them make a good decision.

The campaign strategy has been developed based on audience research and creative testing, as well as feedback from stakeholders such as steering group members of the Canine and Feline Sector Group. The campaign is due to launch in early March 2020 and will run for at least one year.

Annex B:

Numbers of puppies quarantined after being illegally landed in Great Britain, by country of origin. This data includes those that were imported under non-commercial rules (the EU Pet Travel Scheme), as well as those imported commercially under the Balai Directive.

Country of Origin	Puppies 2016	Puppies 2017	Puppies 2018
ALBANIA	0	0	0
ANGOLA	1	0	0
ANTIGUA AND BARBUDA	0	0	0
ARGENTINA	1	0	0
AUSTRALIA	1	0	0
AUSTRIA (EU)	0	0	0
AZERBAIJAN	0	0	0
BAHAMAS	0	0	0
BAHRAIN	0	0	0
BANGLADESH	0	0	0
BELARUS	6	0	0
BELGIUM (EU)	1	0	0
BOSNIA AND HERZEGOVINA	1	0	0
BRAZIL	1	0	0
BRUNEI DARUSSALAM	0	0	0
BULGARIA (EU)	15	41	14
CANADA	2	0	1
CHINA	0	0	0
CONGO, DEM. REP. OF	0	0	0
COSTA RICA	0	0	0
CROATIA (EU)	0	1	0
CYPRUS (SOUTH EU)	3	6	0
CZECH REPUBLIC (EU)	2	19	12
DENMARK (EU)	0	0	0
DOMINICA	0	0	0
ECUADOR	0	0	0
EGYPT	0	0	0
ESTONIA (EU)	0	0	0
EU	3	1	0
FINLAND	0	0	0
FRANCE (EU)	0	0	0
GAMBIA	0	0	0
GEORGIA	0	0	0

GERMANY (EU)	6	0	0
GREECE (EU)	1	0	0
GUAM	0	0	0
GUATEMALA	0	0	0
HONG KONG	0	1	0
HUNGARY (EU)	241	135	27
INDIA	0	0	0
INDONESIA	0	0	0
IRAN, ISLAMIC REPUBLIC OF	0	0	0
ISRAEL	0	0	0
ITALY (EU)	1	1	0
JAPAN	0	0	0
JORDAN	0	0	0
KAZAKHSTAN	0	0	0
KENYA	0	0	0
KOREA, REPUBLIC OF	0	0	0
KOSOVO	1	0	0
KUWAIT	0	0	0
LATVIA (EU)	72	29	9
LEBANON	0	0	0
LITHUANIA (EU)	51	27	2
MACAO	0	0	0
MALAWI	0	0	0
MALAYSIA	0	0	0
MALTA (EU)	0	0	0
MEXICO	0	0	0
MOLDOVA, REPUBLIC OF	0	3	0
MOROCCO	0	0	0
MOZAMBIQUE	0	0	0
N/K	0	1	0
NAMIBIA	0	0	0
NEPAL	0	0	0
NETHERLANDS (EU)	1	0	0
NEW ZEALAND	0	0	0
NICARAGUA	0	0	0
NIGERIA	0	0	0
NORWAY	1	0	0
OMAN	0	0	0
PERU	0	0	0
PHILIPPINES	0	0	0
POLAND	129	92	27
PORTUGAL (EU)	1	0	0
QATAR	2	0	0
REPUBLIC OF IRELAND (EU)	23	7	5

ROMANIA (EU)	31	54	52
RUSSIAN FEDERATION	3	23	2
RWANDA	0	0	0
SAUDI ARABIA	0	1	0
SERBIA	0	0	0
SEYCHELLES	0	1	0
SINGAPORE	0	0	0
SLOVAKIA (EU)	59	27	24
SLOVENIA (EU)	1	0	0
SOUTH AFRICA	0	0	0
SPAIN (EU)	10	11	3
SRI LANKA	0	0	0
ST LUCIA	0	0	0
SWITZERLAND	1	0	0
TAIWAN	0	0	0
THAILAND	0	0	0
TURKEY	0	1	0
TURKS & CAICOS ISLANDS	0	0	0
UAE	0	1	0
UGANDA	0	0	0
UKRAINE	1	0	0
UNITED KINGDOM (EU)	0	0	0
URUGUAY	0	0	0
USA	8	2	0
VENEZUELA	0	0	0
VIRGIN ISLANDS, BRITISH	0	0	0
ZIMBABWE	0	0	0
Total	681	485	178