

Written evidence submitted by the Heathrow Animal Reception Centre (PWA0079)

The Rt Hon Sir Robert Goodwill, MP
Chair, Environment, Food and Rural Affairs Committee House of Commons
Westminster
SW1A 0AA

1 November 2023

Dear Chairman,

Further to my oral evidence to your committee on 17th October 2023, I am writing to you on behalf of the City of London Corporation to provide further information regarding the welfare of companion animals imported into the UK. I enclose supplementary statements on the following key areas:

1. The City of London's responsibilities and activities and Heathrow Animal Reception Centre
2. Key operational challenges
3. Recent findings relating to non-compliance with pet import rules.

I also enclose recent case studies illustrating the points discussed. I summarise our concerns and key requests as:

- There is a requirement for a Defra Live Animal BCP strategy to match capacity to high demand routes (short straits aside), and protection for existing infrastructure so that standards of delivery and animal health and welfare are maintained.
- A ban on the import of mutilated animals through amendment of existing import legislation.
- Increase the minimum age of pet imports from 15 weeks old to six months. Puppies being transported at a young age are not currently owned pets, they are commercial movements and should be managed as such.
- Consider revising the "5-day rule" so that genuine pets do not need to use commercial import rules, therefore reducing the burden on APHA and pet owners.
- Consistent application of existing controls on imports of rescue companion animals and to proceed with planning the licensing of animal welfare establishments with additional controls on imports.

We would like to extend an invitation to any interested parties to attend Heathrow Animal Reception Centre for a tour of the facilities and further discussion, at their convenience.

Yours sincerely

Gavin Stedman
Port Health and Public Protection Director

STATEMENT 1

The City of London's responsibilities, activities and the Heathrow Animal Reception Centre

Heathrow Animal Reception Centre (HARC) is run by the City of London Corporation (the City) to carry out its responsibilities under the Animal Health Act of 1981. This includes responsibility for the whole of Greater London in relation to imports under the Rabies Order, and the welfare of all animals imported into or transiting Heathrow Airport.

HARC is the only all species Live Animal Border Control Post (BCP) in the UK and as such processes commercial consignments of ornamental fish, reptiles, birds and invertebrates, zoo animals, sports horses, farm livestock and dogs and cats. Consignments are handled and presented to APHA for safe inspection. Additionally, the City is an Animal and Plant Health Agency (APHA) approved pet checker and carries out physical and document checks on pet dogs and cats coming to the UK with their owners. This includes recognised assistance dogs which are checked at the aircraft to facilitate access to air travel.

The City's Animal Health and Welfare Service deals with animal welfare complaints and illegal landings across Greater London. The team also undertake licensing of activities involving animals on behalf of 35 London Boroughs and 7 home counties. The Animal Health Team Manager is vice chair of the Southeast Animal Health & Welfare panel, and also sits on a national panel for Local Authorities animal health and welfare delivery.

HARC employs 55 staff and operates 24/7, 365 days a year and can temporarily house a huge number of species in its versatile facilities including:

- 60 kennels/cat units (with dogs having access to individual outside runs)
- 11 bird rooms in a dedicated wing with specialist ventilation, filtration and lighting
- 3 reptile rooms
- 2 dedicated "big cat" caged rooms with feeding hatches, race and re-crating equipment
- 1 Pool room
- 6 stables with scissor lift and roller deck for pallet handling
- 4 Cattle pens
- Fish consignment heated warehouse with inspection room under red light to reduce stress.

Animal throughput

Companion animal throughput (including commercial and non-commercial imports) is summarised in the table below. It should be noted that capacity was limited in 2021 and 2022 due to the pandemic, and so import restrictions had to be introduced at HARC in order to maintain safety and biosecurity. A new live animal BCP opened at Heathrow in January 2023, so HARC no longer receive 100% of bookings. 2023 throughput projections for Heathrow Airport as a whole are anticipated to be similar to 2019.

TOTAL Animals	2019	2020	2021	2022	2023 (Jan-Oct)
Cat	5339	6378	9669	6595	3656
Dog	9764	10049	12344	9344	5389
Ferret	4	5	8	9	31

Full annual data by species group is provided on the following page.

TAXA	2019		2020		2021		2022		2023 Jan - Nov	
	Consignments	Animals	Consignments	Animals	Consignments	Animals	Consignments	Animals	Consignments	Animals
Alpaca	3	29	3	94	1	10	1	10	3	48
Amphibian	79	35658	83	33931	189	104988	190	111289	175	107199
Bird	39	6191	31	1448	33	108	26	427	20	213
Bird of prey	23	154	8	131	21	202	32	302	21	232
Bird (pet)	49	77	26	34	43	76	85	143	19	44
Butterfly Pupae	526	1076573	371	715804	238	258443378	366	16873526883	291	330684416
Cat	3432	5339	3723	6378	5073	9669	3612	6595	1888	3656
Cat (exotic)	7	8	1	1	4	6	2	6	1	1
Day old Chicks	5	12464	6	38841	4	9295	6	78875	3	7605
Dog	7591	9764	7732	10049	9347	12344	7607	9344	4528	5389
Donkey	0	0	0	0	0	0	2	13	0	0
Eggs (SPF)	97	2085546	128	2520829	134	11898547	109	8993436	96	5994799
Ferret	4	4	3	5	6	8	6	9	4	31
Fish	2349	21837678	1780	21372713	2233	25167652	2014	22558182	1688	16843687
Fish Eggs	12	4112710	21	4290511	25	10462859	29	11507901	20	11256545
Goat	0	0	0	0	0	0	1	2	0	0
Hatching eggs	66	961179	76	1795483	77	1280497	73	1268309	132	1460737
Horse	47	283	34	203	34	185	48	331	39	389
Invertebrate	386	16936671056	351	18708433281	298	39176567939	179	26760743602	162	3992517770
Invertebrate (AQ)	1840	4210937	1436	25875324	1660	10944930	1511	608129103	1331	3027609
Lagomorph	12	13	27	135	65	325	71	118	14	21
Lagomorph SPF	0	0	0	0	1	20	1	16	12	318
Other (E)	3	7	2	61	4	7	1	1	2	2325
Other (Q)	15	51	8	682	5	12	15	20	5	27
Pig	0	0	1	2	2	18	8	42	0	0
Plants	3	77	0	0	0	0	0	0	0	0
Primate	7	20	4	28	7	9	20	34	2	2
Reptile	121	63039	95	39708	173	76884	170	36030	70	16292
Rock	1	1	3	2327	0	0	0	0	0	0
Rodent	11	568	17	42	47	699	36	805	7	27
Rodents (SPF)	0	0	0	0	17	114	174	8281	125	11768
Sheep	0	0	1	11	1	10	0	0	2	26
Unknown	56	39534	84	1815185591	11	36200	31	86540	39	19085
Total	16784	16971128960	16055	20580323647	19753	39495016991	16426	44287066649	10699	4361960261

STATEMENT 2

Operational challenges

Key Message

There is a requirement for a Defra Live Animal BCP strategy to match capacity to high demand routes (short straits aside), and protection for existing infrastructure so that standards of delivery and animal health and welfare are maintained.

The City of London welcomes the publication of the Border Target Operating Model and the confirmation that live animal imports will be considered high-risk, retaining the 100% checking regime with a few exceptions. However, the City considers that a clear UK strategy for live animal imports, which considers capacity, the approval of routes and checking facilities will greatly assist the trade, whilst ensuring consistency and promoting animal welfare.

With the exception of the short straights, the City strongly believes that existing infrastructure should be prioritised for investment. Existing live animal BCPs are located to match the demand created by carriers' routings and passenger and shipper preferences. Investment in new facilities that do not take into account established routes, are unlikely to prove viable. Furthermore, failure to have a strategy for approval has already led to competition in the live animal environment, with commercial enterprises setting up and targeting high throughput and high profit elements of live animal imports at Heathrow. Two new BCPs have been approved at Heathrow, with both seeking approval primarily for high volume pets with associated high income. This severely compromises the ability of HARC to cover its costs as an all species BCP and ultimately risks losing the UK's only point of entry by air for many species. The City has reduced this risk by working with one of the new BCP operators to use the facility as an extension of HARC, but the risk still remains.

In the City's capacity as the authority for imports for Greater London, with statutory responsibilities under the Animal Health Act, the lack of UK quarantine facilities for dogs and cats is also a concern to us. More recently, the need for additional bird quarantine facilities to house endangered species detained by Border Force has become apparent. HARC has a dedicated quarantine facility for birds, but demand for our capacity in response to smuggling interception at the border has been exceeded several times this year.

STATEMENT 3

Recent findings relating to non-compliance with pet import rules.

Key Message

- A ban on the import of mutilated animals through amendment of existing import legislation.
- Increase the minimum age of pet imports from 15 weeks old to six months. Puppies being transported at a young age are not currently owned pets, they are commercial movements and should be managed as such.
- Consider revising the “5-day rule” so that genuine pets do not need to use commercial import rules, therefore reducing the burden on APHA and pet owners.
- Consistent application of existing controls on imports of rescue companion animals and to proceed with planning the licensing of animal welfare establishments with additional controls on imports.

The illegal trade in relation to animal imports is multifaceted and we respond in relation to two key areas: non-compliance with pet import rules, and the import of animals with poor welfare practices.

In relation to non-compliance with the pet import rules, a key area of concern is the definition of a non-commercial pet. A pet must travel as a result of its owner’s travel and as an APHA approved pet checker, we are required to ask the owner or their nominated person, for proof of their own travel within 5 days either side of the pet import. This rule is problematic when importing pets by air. There are daily occurrences of commercial imports of dogs and cats that are actually genuine pets. It is not always possible to book travel by air within the 10-day window, and in many cases, pets remain with family or in kennels whilst the owner settles in the UK or the animal completes its veterinary preparation. Missing the 10-day window places an additional complication and cost for the owner and means that APHA must carry out checks that could otherwise be delegated to an approved pet checker.

In contrast to this issue, we are aware of commercial imports of dogs and cats where an authorised person is nominated to travel with the animal, evading the cost of an APHA check by claiming the animal is non-commercial. We are also aware of a shipper who brings multiple pet animals in on a single commercial booking, paying for one airline consignment booking and one APHA check, reducing the cost for each individual owner to below the non-commercial cost. These examples demonstrate that the current definition of a non-commercial pet requires review in order to minimise the burden to APHA and to genuine pet owners.

Minor, administrative non-compliance with the pet travel rules is estimated to be between 10-20% for pets checked by HARC. These are “section 1” errors that do not require correcting by the approved pet checker, in order to release the pet to the owner. The majority of these will be due to attestations not being properly deleted, or where the unique number of a health certificate is not duplicated on every page. Section 2 and 3 failures, where additional information must be sought by the pet checker before the pet can be deemed as compliant, or where the pet must be re-exported or licenced into quarantine, is lower at around 1% to 2.5% of all non-commercial pet consignments checked by HARC. HARC offers a non-statutory pre-check service for pets. Use of this services is

rewarded with a discount as uptake is a key driver for reducing non-compliance. Requiring a pet to be re-exported or licensed into quarantine for weeks or months is sub-optimal for welfare and HARC strives to reduce these incidents wherever possible.

Falsification of documents is also an area of non-compliance. Pets from unlisted countries require a blood test three months after their rabies vaccination, to demonstrate that the vaccine has been effective. Pets that meet the requirements on arrival are customs cleared and released to their owners. However, blood tests are validated by forwarding the details to the relevant laboratory and awaiting their confirmation. Pets are not held until results are verified, but typically, around 1% of blood tests are found by HARC to be fraudulent, likely in a bid to avoid the waiting time or laboratory fees. In these instances, the illegal import is referred to the relevant Trading Standards, or our team will take action if the pet remains in Greater London.

Imports of rescue dogs and cats are a significant concern in relation to both abuse of the non-commercial process and poor welfare practices. Rescue animals imported for new homes are commercial movements although there they are not always imported as such, and there have been past inconsistencies with these animals accepted as pets by pet checkers at other airports.

As commercial imports, these animals must be held at destination address for 48 hours, but we believe that this is frequently abused with animals going straight to new homes, resulting in an increased risk that disease will not be detected before spreading. Furthermore, there is little confidence that this rehoming practice is welfare or safety orientated, with limited opportunity to assess the suitability of pet for a specific home. UK based rehoming organisations will also have measures in place to help new owners in the event of a failed adoption; overseas operations are not likely to have resources in place to help in such incidences.

In 2022, HARC received 75 rescue dogs over 18 consignments, and 1,660 rescue cats over 257 consignments. Poor fitness to travel is often seen with rescue consignments, with cats in particular regularly having flu symptoms and eye infections.

We consider amendment of the existing import legislation to be an appropriate way to address poor welfare practices associated with the transport of companion animals. Banning the importation of animals with mutilations would facilitate enforcement of existing protections. Raising the minimum age of dogs and cats to six months, would reduce commercial imports of puppies using the pet import rules. These were issues raised under The Animal Welfare (Kept Animals) Bill, which could be taken forward with a review of the import rules.

As the Local Authority responsible for welfare in transport across Heathrow Airport, compliance with the International Air Transport Association Live Animals Regulations (IATA LAR) is assessed for 100% of animal imports at HARC. 5-10% of pet carriers are not compliant and where this is deemed to be a welfare risk for the animal, airlines are issued formal enforcement action is taken under the Welfare of Animals (Transport) (England) Order 2006. Welfare in transport is also the responsibility of APHA. Approved pet checkers should report welfare concerns to APHA (and/or the relevant Local Authority), but the robustness of this at other points of entry is a concern. Having regulatory authorities conduct pet checking may not be practical across the UK, but as a result of its pet checking and BCP activities, the City continues to see non-compliance by airlines and works consistently to address this.

We have seen a reduction in illegal landings under the Rabies Order in Greater London. The national picture supports this with other local authorities reporting reductions in illegal landings or levels remaining the same. This is likely due to the cost of living and reduced demand for puppies since the pandemic. However, there is also a move towards the use of more microchips which are not country specific, and it is believed that importers have realised to not supply documentation when selling any dogs or cats that would indicate they have been imported. This is making illegal imports harder to detect. Puppies are typically presented to vets for vaccinations or due to ill health, and vets report them to Trading Standards if they have foreign microchip numbers and appear too young to be compliant, or they have passports indicating that they are non-compliant.

CASE STUDY 1

Date of Offence: 19/08/2023

Three cats were imported into Heathrow Airport, London as commercial imports. The airline had not notified us of the arrival and Heathrow Animal Reception Centre (HARC) officers were contacted upon landing and requested to collect the cats. Upon arrival the HARC officer found that one of the cats had given birth to three kittens, presumably during the flight. The cat and kittens were examined by APHA and received further care from a contracted vet and a City of London vet. One of the kittens was rejected by the mother and died at HARC the following day, despite attempts to hand rear. The mother cat was in a poor condition with low bodyweight and some respiratory discharge. After a few days, the kittens were found to be not putting on sufficient weight and it was feared the mother was struggling to supply sufficient milk. The kittens were given supplementary kitten milk but rapidly deteriorated and were taken to a veterinary clinic for care. Unfortunately, despite efforts to care for the kittens in the clinic, they were all euthanised due to poor health. It is believed that the stress of transport and the poor condition of the cat contributed to her kitting during the flight and subsequent death of the kittens.

It is an offence to transport animals in a manner that does not comply with Council Regulation 1/2005. Annex 1, Chapter 1 of this regulation states that:

2. Animals that are injured or that present physiological weaknesses or pathological processes shall not be considered fit for transport and in particular if:

(c) they are pregnant females for whom 90 % or more of the expected gestation period has already passed, or females who have given birth in the previous week;

(d) they are new-born mammals in which the navel has not completely healed;

The City Corporation regards the welfare of animals as of the utmost priority. This matter was considered for prosecution, however, on this occasion, a decision was made not to prosecute the airline for the above offence. This decision was made as the airline engaged proactively with HARC officers when alerted to the offence, providing all information required, and evidence that they had not been made aware that the cat was pregnant. In the case of this cat, it would not have been obvious upon a typical visual inspection required by an airline, that this female was pregnant.

CASE STUDY 2

Earlier this year our officers were involved in a warrant relating to the illegal breeding, sale and welfare of XL bully's. The search found 4 pet passports of which 2 were Bulgarian and 2 Romanian. These passports were either blank or incomplete which supports officers' suspicions that they are likely to be used to hide illegal mutilations (cropping and/or docking) of dogs being undertaken in the UK. Whilst the legal importation of dogs and cats with mutilations does allow prospective pet owners to purchase ear cropped dogs for example, or to have their own pets mutilated abroad and imported back to the UK, we are also concerned that falsified passports can be used to hide illegal mutilations carried out in the UK.

CASE STUDY 3

Our Animal Health Team carries out licensing of animal activities across Greater London and the Home Counties. As the authority for Greater London in relation to imports, we are frequently called upon to advise and assist with investigations. In January 2020 a London Borough reported to us a licensed breeder had imported 3 pregnant dachshund bitches from Hungary. One was transported at more than 90% through gestation and had given birth. The dogs were detained by AHPA under TARP. The import of pregnant bitches for breeding is a legal activity, provided they are not transported more at than 90% gestation and are otherwise fit for travel. However, this needs to be addressed as it is contrary to what the expected level of animal welfare should be.