

## Written evidence submitted by RSPCA (PS0002)

### RSPCA response to Efra inquiry on puppy imports, the impact of legislation e.g. 3rd party ban, the impact of Covid-19 on the rescue sector and post transition period movement of pets.

#### Summary

The RSPCA supported the two recent changes to legislation intended to help stop third party sales of puppies but loopholes highlighted in 2019 have proven correct and the third party ban is largely ineffective due to these loopholes and poor enforcement. These have been exploited by third party dealers and need to be closed. Brexit provides an opportunity to close one loophole, on the mismatch of ages to sell and import puppies. Raising the age for imported puppies to 24 weeks, could solve many of the enforcement issues. The Government also needs to fast track the Animal Welfare (Sentencing) Bill to provide a deterrent to dealers and bring in mandatory licencing for rescues and sanctuaries as Scotland has done.

Covid-19 lockdown restrictions have resulted in a doubling of popular puppy prices and a worrying trend in legally imported and illegal puppies. Evidence shows that puppy importers have exploited the patchy enforcement of trade regulations by bringing in illegal puppies to sell via third party dealers. Covid-19 has also seen a reduction in incidents being reported to the RSPCA with calls halved compared to normal. Calls to the RSPCA are now returning to 2019 levels but aside from cats, horse and dog rescues, and investigations are still well down on 2019. It is anticipated that rescues and cruelty complaints will rise as people return to work. It is expected that there will be a particular rise in complaints on dogs and horses. The abandonment and relinquishment of dogs may also increase as a result of poorly bred puppies, increased prevalence of COVID related behaviour problems and possible changes in people's personal circumstances.

The rescue sector has saved the smaller rescues from financial meltdown. ADCH and NEWC's fighting funds have distributed over £310,000 to over 46 cat and dog organisations and £190,000 to equine groups. The UK Government's furlough scheme was vital with 52% of rescues taking advantage to reduce staffing levels by using the scheme. But to date no stand alone Government funding has been awarded in England or Scotland to any animal rescue; only the Welsh Government offered such funding. It is not clear what the impact of restrictions easing will be on the financial viability of the sector particularly in the horse rescue sector.

1. The RSPCA is pleased to respond to this consultation looking at the puppy trade, the effectiveness of the third party ban in England, the impact of Covid-19 on the sector and the impact of Brexit on travel with dogs and cats. The RSPCA is the oldest and largest animal welfare organisation in the world and has vast experience investigating the illegal trade in puppies and third party dealers. In the past ten years the RSPCA has investigated over 30,000 puppy trade complaints from members of the public and in the past five years has undertaken 35 successful or pending prosecutions of third party sellers. We also work with the ISPCA, DSPCA and SSPCA on multi agency investigations into the puppy trade across the

UK, particularly from Ireland. This response uses information from these experiences. The RSPCA also undertakes 85% of enforcement effort under the Animal Welfare Act 2006 and so is well placed to understand the impact of Covid-19 on the rescue sector.

**The extent of the problem of puppy, kitten and other companion animal smuggling; and Government statistics on this issue (including their accuracy and timeliness); the impact of smuggling and COVID-19 on supply and demand, and the effectiveness of enforcement; the impact of recent measures including Lucy’s Law and the “Petfished” campaign, and what other measures should be taken**

2. In 2012, the English dog population was estimated to be around 7.2 million<sup>1</sup> and given the increase in dog ownership across the UK<sup>2</sup> to date, it is likely to be even greater suggesting that at least 600,000 dogs are needed annually to replenish the population though actual numbers may be much more due to death en route or immediately post sale. Covid lockdown restrictions resulted in a huge increase in demand (see later sections) so the dog population may have changed in 2020. Around 10% of the market was supplied by licensed breeders in 2015<sup>3</sup> but following the introduction of the Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018, this will have risen due to a change in the threshold of litters bred for which breeders need to be licensed. No accurate data exist but it is still likely to be under half the puppies entering the market are from licensed breeders, leaving the other half to be filled by unlicensed English breeders or imported puppies including those from Wales, Ireland and central Europe. Welfare issues in the trade, disease risks and the illegal trade are well documented and have been covered in previous RSPCA submissions to Efra.
3. The RSPCA supported the new licensing legislation (LAIAR 2018) that came into force on 1 October 2018<sup>4</sup>. This implemented a ban on the selling of puppies bred in England by third party sellers. On April 6 2020 this ban was extended to include all puppies under six months being sold in England aside from those sold by the breeder or from a rescue centre. Whilst the RSPCA supported the intent of the ban, the legislation had three loopholes as stated in our evidence to the Efra inquiry in September 2019<sup>5</sup>. These loopholes, as described in points 4 and 5, have effectively nullified the intent or enforcement of the legislation. The import data suggest that the legislation has not had any impact on the illegal trade or sale of puppies in England in the past six months and it is not clear if any enforcement action has occurred under the new law.
4. If the trade is to be reduced the Government needs to take measures to counter these three loopholes. Firstly they should introduce mandatory licensing of rescue centres to prevent commercial third party dealers setting themselves up as rescue centres, which are exempt from the ban. The RSPCA knows of two examples, one in Wales and one in England where

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<sup>1</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/82470/dangerous-dogs-annexb-microchipping-ia-120423.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/82470/dangerous-dogs-annexb-microchipping-ia-120423.pdf)

<sup>2</sup> <https://www.pfma.org.uk/historical-pet-population>

<sup>3</sup> Battersea 2015. <https://www.battersea.org.uk/battersea%E2%80%99s-new-report-exposes-murky-world-dog-breeding>

<sup>4</sup> <https://www.legislation.gov.uk/ukdsi/2018/9780111165485>

<sup>5</sup> RSPCA 2019 Submission to Efra Committee enquiry on puppy smuggling

third party dealers have rebranded themselves as rescue centres to get round the ban. Scotland will introduce mandatory licensing next year, Wales introduced a voluntary code last month but Defra have yet to consult on their proposals.

5. Secondly LAIAR 2018 does not license all breeders regardless of litters bred so dog breeders can sell puppies if they are not deemed as commercial vendors ie they fail to reach the £1000 commercial turnover threshold. It is the RSPCA's view that all people, regardless of number of litters bred or failure to meet the commercial threshold, should be registered.
6. Finally there needs to be a solution to the selling of puppies by "breeders" from other countries. This includes for instance third parties dealers from Romania stating they are the breeder of the dogs being sold or third party dealers from Wales who have a vendor licence issued by in that country. It is acknowledged that Defra cannot ban the import of puppies into England from other countries. This would be illegal under the Internal Market Bill for imports within the UK internal market (Wales and Northern Ireland supply an unknown but important part of the English market). It would also be illegal on imports from third countries as it would fail the World Trade Organisation (WTO) tests on being a disguised restriction on trade (as breeding of puppies is allowed in England) and it is an arbitrary discrimination - an imported commercially-bred puppy is "like" an imported non-commercially bred puppy. However the Government can solve this issue, once it leaves the Single Market, by raising the minimum age to import puppies to six months. The present age, 15 weeks, is inconsistent with the minimum age, six onths, permitted by third party dealers to sell puppies. This allows importers to continue to bring in puppies even though they cannot legally be sold on. Other countries have successfully used it as a method to curb the illegal trade in puppies. The USA raised the minimum age to six months in 2014 under the Animal Welfare Act<sup>6</sup> to counter the illegal import of puppies from Mexico and South Korea. Anecdotal information shows it has had a positive impact. The measure has not been challenged in the WTO.
7. The Government in Wales is due to implement its third party ban in early 2021 and intends not repeat the mistakes in England though there has been no clarity to date on how the law will be worded<sup>7</sup>.
8. Enforcement will still be crucial. The third party ban came in just a week after the total Covid-19 lockdown so has yet to be assessed under normal conditions. Covid-19 impacted on the puppy trade in two areas. First there was a relaxation on certain enforcement efforts as staff were redirected onto essential Coronavirus business. One example is the cessation of checks by APHA at the final destination for imported commercial puppies to assess disease status and compliance of the import permits. Essentially if any irregularities in the documentation on imported puppies was not detected at the border post, no second checks were undertaken.

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<sup>6</sup> [https://www.aphis.usda.gov/animal\\_welfare/downloads/AC\\_BlueBook\\_AWA\\_508\\_comp\\_version.pdf](https://www.aphis.usda.gov/animal_welfare/downloads/AC_BlueBook_AWA_508_comp_version.pdf)

<sup>7</sup> <https://gov.wales/sites/default/files/consultations/2020-09/puppies-and-kittens-summary-of-responses.pdf>

9. Secondly the demand for puppies increased exponentially as people wanted companionship or exercise under lockdown. During lockdown, Google searches for 'Puppies near me' increased more than six times (650%) with 15,000 searches in July 2020 compared to 2,000 in January 2020. The figure was also five times higher than the same month last year (July 2019). This resulted in a reported shortage of puppies<sup>8</sup> and the price increased dramatically in a short period of time. For example, internet searches found prices of French bulldogs increased from the usual price of £1500-2000 to £7000<sup>9</sup>.
  
10. As English breeders were not able to satisfy that demand that quickly, the trade in imported dogs rose dramatically and there was a worrying trend in legal and illegal trade from third countries, in particular Romania. Whilst movements of dogs under PETS crashed by 88% YoY in May due to travel restrictions<sup>10</sup>, movements of commercial dogs, measured by ITAHCs issued rose by 43% YoY and 387% in the previous month<sup>10,11</sup>. This has continued over the summer. Government figures show that numbers of licences issued for the commercial import of dogs rose 87% from 14,075 May-September 2019 to 26,4461 for the same period this year<sup>11,12</sup>. Indeed five of the six highest recorded months for commercial imports of dogs were June-October 2020. Multiple puppies can come in under the same ITAHC so this represents only a minimum of legally imported puppies. As well as puppies, similar demands for dogs within rescue were observed<sup>13</sup>. 66% of 134 rescues surveyed by ADCH in April 2020 showing an increase in people wanting to foster dogs<sup>14</sup> and a decrease in dogs being abandoned. Likewise, the RSPCA's online Find A Pet saw a surge in visits during lockdown, increasing 129% to more than 3,700,000 searches compared to 1,600,000 last year.
  
11. It is clear that demand has not dissipated over the summer and October 2020, traditionally the month with the highest number of ITAHCs being issued for puppy imports for the Christmas market, showed the highest numbers of ITAHCs ever issued. The RSPCA remains concerned about the demand for puppies and sources of these puppies that could result in diseased puppies lacking in adequate and appropriate socialisation. With research suggesting that animal ownership can mitigate against some of the detrimental psychological effects of COVID lockdown<sup>15</sup> and the advent of another national lockdown in England, This poor start to life, along with the likely increased prevalence of behaviour problems resulting from COVID-19 e.g. separation related behaviour<sup>16</sup>, and behaviour

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<sup>8</sup> <https://www.ft.com/content/1d14541e-0c11-48bb-90a1-3f7dc05258a6>

<sup>9</sup> Puppy prices soar in Covid-19 lockdown. *Vet Rec.* 2020;187(1):4-5. doi:10.1136/vr.m2755

<sup>10</sup> PQ 52115 8/6/20

<sup>11</sup> PQ 85115 HC Deb, 9 September 2020, cW

<sup>12</sup> PQ 111638 4 November 2020

<sup>13</sup> Morgan, L., Protopopova, A., Birkler, R. I. D., Itin-Shwartz, B., Sutton, G. A., gamliel, a., ... Raz, T. (2020, June 5). Human-dog relationships during COVID-19 pandemic; booming dog adoption during social isolation. <https://doi.org/10.31235/osf.io/s9k4y>

<sup>14</sup> ADCH. 2020 Survey of 134 rescues in UK and Ireland

<sup>15</sup> Ratschen E, Shoesmith E, Shahab L, Silva K, Kale D, et al. (2020) Human-animal relationships and interactions during the Covid-19 lockdown phase in the UK: Investigating links with mental health and loneliness. *PLOS ONE* 15(9): e0239397. <https://doi.org/10.1371/journal.pone.0239397>

<sup>16</sup> [https://www.dogstrust.org.uk/help-advice/research/research-papers/201020\\_covid%20report\\_v8.pdf](https://www.dogstrust.org.uk/help-advice/research/research-papers/201020_covid%20report_v8.pdf) and <https://www.apbc.org.uk/wp-content/uploads/How-to-reduce-the-development-of-behavioural-problems-in-our-dogs-during-the-Coronavirus-Pandemic..pdf>

problems contributing as a major risk factor for relinquishment<sup>17</sup> could result in a high abandonment rate when lockdown eases.

12. There is a criminal element in the trade but the degree of large scale organised crime involvement is unknown and a report by the Croatian Presidency in June considered it to be small<sup>18</sup>. RSPCA has seen links between puppy dealers and both animal welfare criminal behaviour such as badger baiting and other criminal behaviour such as drugs. Criminal elements are attracted to the trade as the risk of getting caught is low and even when caught punishment is low compared to drugs or people smuggling. Against this, large profits can be made; a puppy worth €40 in Romania can sell for €700 in the UK and income high - one dealer prosecuted by the RSPCA was earning £3 million annually. This money is hidden but when investigated, monies reclaimed by the Government can be substantial - HMRC reclaimed £5.3 million for 257 cases over a four year period<sup>19</sup>.
13. Solutions to the illegal trade include increased sentencing to five years for animal welfare offences and for offences under legislation regulating imports and sales. The puppy trade is possibly the most important area for increased sentencing as some dealers treat 6 months prison as an occupational hazard. Traders do not trade in puppies because they like them but because there is less risk than compared to other smuggled commodities. Other solutions include better enforcement. The HMRC tax investigations have been very successful at targeting proceeds of crime from the puppy trade and should be continued. Keeping contacts with other tax investigations authorities in the EU is vital as the UK leaves the EU due to the changing nature of the trade and routes and markets used. Import of dogs is not a Border Force priority though targeted enforcement activity has proven successful at disrupting the trade. Enforcement of LAIAR 2020 and LAIAR 2018 is vital and can only be achieved by properly funding local authorities. Otherwise adverts will continue to appear that are contrary to LAIAR 2018 such as missing the relevant vendor licence number. The use of FPNs to enforce horse microchipping and identification whereby that income stream returns to the local authority may be a model to examine for puppy selling.
14. There is no accurate data on illegally imported puppies but some estimates can be made. RSPCA cross border reports of the illegal puppy trade investigated rose from 20 in 2010 to 491 six years later. To date in 2020 the RSPCA has received over 200 reports. Export countries changed from only Ireland, to Romania and other central European countries and Ireland. Legal and illegal trade from some countries such as Lithuania and Hungary dropped as the market trade routes shifted. The illegal puppy trade can take many forms. Misdeclaring commercial puppies under non-commercial PETS, misdeclaring the age of puppies under TRACES, not declaring puppies at all or reclassifying puppies as EU origin when imported from a non EU country. With only 2% of trade being checked on a high volume trade, potential for illegal trade is high. The UK has raised the issue of ensuring proper documentation in the exporting country at a Chief Veterinary Officer level, and this

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<sup>17</sup> Kwan JY, Bain MJ. Owner attachment and problem behaviors related to relinquishment and training techniques of dogs. *J Appl Anim Welf Sci*. 2013;16(2):168-83. doi: 10.1080/10888705.2013.768923. PMID: 23544756.

<sup>18</sup> [https://www.eurogroupforanimals.org/sites/eurogroup/files/2020-09/Eurogroup%20Illegal%20pet%20trade%20report\\_v7.pdf](https://www.eurogroupforanimals.org/sites/eurogroup/files/2020-09/Eurogroup%20Illegal%20pet%20trade%20report_v7.pdf)

<sup>19</sup> <https://www.gov.uk/government/news/millions-raised-from-tax-evading-dog-breeders>

has improved compliance with legislation in certain countries. There has also been a shift in the trade from non commercial to commercial imports particularly from Romania, the primary supplier of legally imported commercial puppies to the UK<sup>20</sup>.

15. There is generally a lack of knowledge among consumers around puppy buying behaviour with a survey<sup>21</sup> finding that 62% of pet owners were not aware of LAIAR 2018. The Governments in England and Scotland have run well researched and targeted puppy behaviour change campaigns aimed at the puppy buying public. The Scottish campaign in 2019 and 2020 and the Defra petfished campaign in Spring and Autumn 2020 both seek to disrupt the buying behaviour of potential puppy owners by focusing on the hidden nature of the trade and the welfare consequences of a poor purchase decision. They met their goals of reaching the target audience. But behaviour change campaigns face an uphill task as puppy buying is an emotional purchase and once a person has decided to purchase a puppy it is difficult to stop this behaviour from resulting in a sale. This, the deception and adaptability of illegal sellers to comply with advice and guidance, and the data on imported puppies above highlight the limitations of these campaigns.
  
16. There are two vulnerable pinch points for the illegal trade in puppies. The first is at the border point, where enforcement is crucial. However enforcement of the puppy trade is not one of the Border Force priorities. Even when checks are in place, it is understood that puppy importers exploit this by arriving on postbuses or by dog couriers at weekends and after 5 pm meet reduced checks, increasing the potential to avoid detection. Visual evidence of Romanian dogs being swapped between vehicles at Calais Eurotunnel was reported on a Saturday this month. Increased border enforcement can disrupt the trade. Imports from Ireland are limited to seven ports with known ferry times, resulting in potential for greater enforcement effort and disruption to trade. Joint Scottish Government/Police Scotland/SSPCA enforcement action at Cairnryan from 2016 regularly confiscated illegal puppies, 261 illegally landed dogs being confiscated in the first 11 months of 2017<sup>22</sup>. This together with joint intelligence work involving the ISPCA, DSPCA and RSPCA, the relevant Governments and police on the Irish trade, and targeted enforcement action at other ports<sup>23</sup>, changed the behaviour of illegal puppy traders, including changing routes, hiding imported puppies and bringing in “breeding bitches” to dupe potential consumers to believe the puppies were home bred rather than imported.
  
17. The second pinch point is at the point of bringing the puppy to market. Here the role of the websites is crucial to ensure anyone selling commercially has a licence and anyone selling using the business exemption is not a commercial enterprise. There are wide variations in the response from websites on this responsibility - some are members (eg Gumtree) of the

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<sup>20</sup> RSPCA. 2016 Sold a pup: Exposing the breeding, trade and sale of puppies

<sup>21</sup> PDSA Animal Wellbeing Report 2019 [https://www.pdsa.org.uk/media/7420/2019-paw-report\\_downloadable.pdf](https://www.pdsa.org.uk/media/7420/2019-paw-report_downloadable.pdf) (Accessed September 2019)

<sup>22</sup> <https://www.itv.com/news/border/2017-09-12/scale-of-illegal-puppy-imports-in-d-g-is-a-real-problem/>

<sup>23</sup> <https://www.north-wales.police.uk/news-and-appeals/almost-100-puppies-rescued-at-holyhead-in-shocking-example-of-illegal-puppy-trade>

Pet Advertising Advisory Group and do report on how they are tackling this issue, others do not engage.

**The end of the Brexit transition period and the impact on pet travel requirements, plus the situation regarding the NI Protocol and also GB's involvement in the EU's PETS scheme**

18. Dogs and cats can travel freely with their owners under the Transition Period across the EU via the Pet Travel Scheme. For movements to be able to continue under similar conditions to those at present, the European Commission needs to amend subordinate EU legislation to ensure that the UK is listed as a third country<sup>24</sup> to recognise the UK's animal health status. Under a no deal the UK would be unlisted and checks to travel may take up to four months<sup>25</sup>. The UK has applied for listed status but this has yet to be given, as withdrawal negotiations continue.
19. Providing Great Britain is listed by the European Commission as an authorised source of imports for animals and animal products, animals imported into the EU's SPS Area (including Northern Ireland) must be notified through the EU's TRACES system. It is clear that checks on live animals and animal derived products have to occur somewhere on the island of Ireland but unclear as to the extent that the ports of Larne, Belfast and Warrenpoint will be ready to fully implement the Protocol as of January 2021 with regards to checks on animals. Though construction has started on new facilities both in Northern Ireland and Dublin it is likely these will not be ready for 1 January 2021<sup>26</sup>.
20. The Government advice on movement of dogs and cats to Northern Ireland changed in October from passports will be needed under PETS to "no significant changes are envisaged" and there is "no rational justification for movements not to continue in a very similar way to now"<sup>27</sup>. The RSPCA believes that any animal entering the EU SPS area, such as when travelling to Northern Ireland, will require a pet passport.

**COVID-19 and the impact on the companion animal welfare sector including the finances and demand for services of the charitable sector, and Government support.**

21. During COVID, calls to the RSPCA halved compared to similar periods in 2019, presumably due to lockdown rules preventing people from going out and seeing incidents of cruelty or neglect. There is no information if this represents a rise or fall in actual animal cruelty. The number of calls to the RSPCA are now returning to 2019 levels but this is not the same for animals rescued or taken into care. Aside from cats and wildlife, rescues and investigations into horses and dogs are still well down on 2019 or even pre Covid lockdown levels. It is anticipated that rescues and cruelty complaints will rise as people return from home working once the latest lockdown is relaxed. It is expected that the RSPCA will see large rises in the number of complaints from the public on dogs and horses.

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<sup>24</sup> For dogs and cats the UK needs to be added to Annex II (Parts I or II) of Commission Implementing Regulation (EU) No 577/2013, whereas for equines the UK needs to be added to Annex I of Commission Implementing Regulation (EU) 2018/659

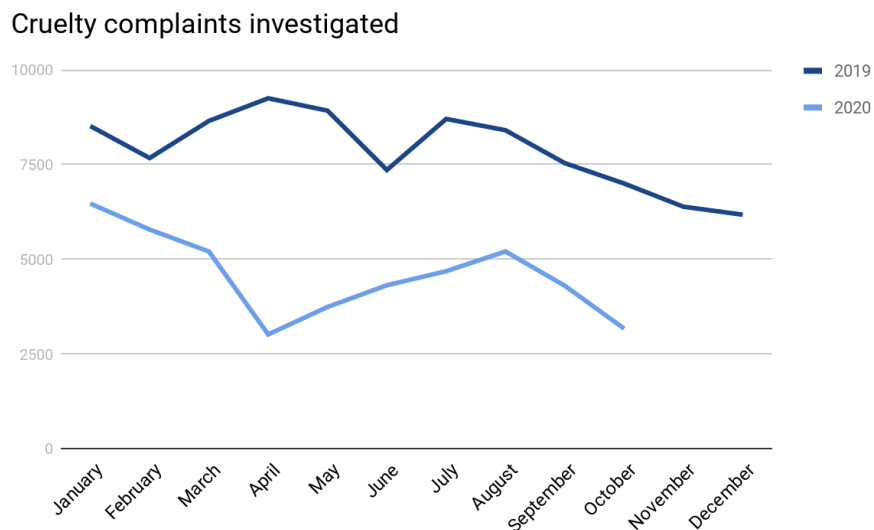
<sup>25</sup> <https://www.gov.uk/guidance/pet-travel-to-europe-after-brexite> accessed 29/10/20

<sup>26</sup> <https://www.bbc.co.uk/news/uk-northern-ireland-54810373>

<sup>27</sup> PQ 109737 30.10.20

22. In line with calls received from the public, reports received and investigated on animal cruelty by the RSPCA have also decreased since lockdown reflecting the RSPCA's change in approach to dealing only with emergency cases (Figure 1). Following an immediate post lockdown 50% drop in calls to the RSPCA, drops of 17% (cats) - 60% (dogs and horses) in animals rescued occurred in March. As restrictions were lifted, calls started to steadily rise in May-July to above 2019 levels, mainly concentrated on wildlife rescues which increased enormously in May, above seasonal expectations. By August the calls RSPCA received was 90% of the 2019 level, compared to April which saw 70% of calls compared to 2019. In contrast, cruelty complaints investigated continued to be around 55% YoY reduction. There are wide species variations. The number of cats the RSPCA rescued are now almost back to pre lockdown levels, compared to a 65% drop in dog rescues and a 95% drop in equine rescues. These data match the anecdotal survey data compiled by ADCH who report dog abandonment and stray dogs down, but cat abandonment rising<sup>6</sup>. This is possibly because people are in lockdown and are finding companionship with dogs. Demand for dogs especially puppies has spiked under lockdown (see paras 9,10). Cat abandonment and rescue is up likely due to lockdown coinciding with the unavailability of neutering at veterinary practices and the start of the annual feline reproductive cycle. Horse abandonment may start to go up in the autumn as grazing reduces. The RSPCA fears that as the economic consequences of Covid-19 take hold the ongoing equine crisis will result in greater numbers of horses being neglected or abandoned.

23. Figure1 Cruelty complaints investigated by RSPCA 2019-20



24. Despite social media being awash with rumours of Coronavirus leading to greater abandonment of cats and dogs, and reports of abandonments and increased euthanaisa in other countries affected by COVID-19, this, to date, has been more limited in the UK than anticipated. However we may yet see the true impact. ADCH surveys showed that 15% of rescues reporting more cats being abandoned and this is reflected in the RSPCA data. The number of cats being rescued as a result of cruelty complaints doubled in May compared to April and is now similar to pre lockdown data. The number of cats taken into RSPCA care in



July was above that for March, whereas for dogs it reduced by 35% and for horses intake was 92% down. In terms of impact on welfare, many studies looking at the impact of COVID-19 on pet behaviour have yet to report. However, a recent study found that during the pandemic, owners who reported that their quality of life was poorer had dogs with a lower quality of life and the development of new behaviour problems were also found<sup>28</sup>. Similarly, a recent study from Dogs Trust exploring the effect of COVID-19 on dogs and their owners found increased reporting of clinginess and attention seeking behaviours as well as behaviour associated with fear or frustration<sup>29</sup>. As mentioned earlier, this increase in prevalence of behaviour problems is a real concern for the sector given their contribution as significant factors to pet relinquishment and euthanasia.

25. Guidance on running pet businesses under Coronavirus restrictions has been produced by the Government's sector group advisors, the Canine and Feline Sector Group (CFSG). This has provided advice for seven types of businesses including dog and cat breeding and dog kennelling. The UK Government was slow to respond with generic guidance for pet owners straight after lockdown which took about two weeks to deliver despite advice and draft Guidance from CFSG. The Government Guidance was too generic and did not answer the questions required. This was partly due to No 10 having to sign off any Guidance and partly as the Government's response to Coronavirus was emerging. This is the only piece of UK Government Guidance on animal welfare though the Welsh Government has produced their own. All subsequent Guidance for England was written by CFSG and signed off quickly by Defra but was only defined as CFSG Guidance endorsed by Defra and not put on the Government website. CFSG website became essentially the guide and go to place for all animal welfare guidance particularly for local authorities and businesses, such as dog walking, dog grooming and dog kennelling, when the business guidance was agreed.
26. Other devolved administrations have also used CFSG Guidance. The Scottish Government essentially used CFSG Guidance which is posted on the Scottish SPCA website, animal welfare guidance in Northern Ireland has been very patchy and guidance in Wales was taken from CFSG but was approved and measured against the Welsh Government's restrictions before being issued. The Welsh Government's advice on the recently implemented Covid-19 circuit breaker now links direct to animal welfare advice on the website hosted by the Animal Network of Wales<sup>30</sup> and is a good example of joined up and timely work between the Government and sector.
27. Financial hardship is a reality for the rescue sector but the predicted impact on financial viability and mass closures has not yet emerged. The total predicted financial loss from all the rescues was £101.4 million for the year (an average of £998,000 and a range from minimal to £41 million). The seven major rescues<sup>31</sup> have budgeted a 33% drop in income in

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<sup>28</sup> Morgan, L., Protopopova, A., Birkler, R. I. D., Itin-Shwartz, B., Sutton, G. A., gamliel, a., ... Raz, T. (2020, June 5). Human-dog relationships during COVID-19 pandemic; booming dog adoption during social isolation. <https://doi.org/10.31235/osf.io/s9k4y>

<sup>29</sup> [https://www.dogstrust.org.uk/help-advice/research/research-papers/201020\\_covid%20report\\_v8.pdf](https://www.dogstrust.org.uk/help-advice/research/research-papers/201020_covid%20report_v8.pdf)

<sup>30</sup> <https://gov.wales/animal-businesses-rescue-and-rehoming-coronavirus-guidance> accessed 29/10/20

<sup>31</sup> RSPCA, SSPCA, Blue Cross, Cats Protection, Dogs Trust, PDSA

2020 due to lack of opportunities for public fundraising such as events, street and door to door activities.

28. There is a difference between the financial viability of rescues depending on what species they rescue. 64% of equine rescues reported an income drop of more than 50% compared to dog and cat rescues where 47% reported a drop of over half their income<sup>6,32</sup>. Whilst 58% of cat and dog rescues have funds that will ensure they can continue to operate into 2021, 79% of equine organisations only had funds for six months or did not know how long their funds would last<sup>30</sup>.
29. The rescue sector has saved the smaller rescues from financial meltdown. No stand alone Government funding has been awarded in England or Scotland to any animal rescue; only in Wales has such funding been offered. ADCH and NEWC set up fighting funds which have distributed over £310,000 to over 46 cat and dog organisations and £190,000 to equine groups. In addition specific funds were set up by the RSPCA and Cats Protection for their branches and have helped the sector move into a more financially sustainable position particularly in the April-May period after the lockdown happened and essentially all non-legacy funding ceased immediately. 65% of rescues applied for grants<sup>6</sup>.
30. The UK Government's furlough scheme was vital. 52% of rescues in the ADCH survey reduced staffing levels by using the Governments' furlough schemes, 12% by over half pre-lockdown staff levels<sup>6</sup>. The RSPCA mitigated the impact of reduced income on its work by furloughing 23% of staff at its height, going to emergency only calls and stopping 24 hour cover. The furlough scheme worked well in terms of payment of invoices. It is not clear yet how many rescues will use the Government's new winter Job Support Scheme.
31. The Government has given no stand alone funding in England despite representation from ADCH, NEWC and Defra to the Treasury. Grants have been available to rescue centres in Wales. It is not clear what the impact of restrictions easing in autumn will be on the financial viability of the sector particularly in the horse rescue sector.

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<sup>32</sup> NEWC. 2020 Survey of equine organisations