

Puppy Smuggling/Imports – EFRA Inquiry - Written Evidence Doc

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Overview

The issue of illegal and legal puppy smuggling/trading is serious on many levels, including risks to animal health, public safety and protection, controlling criminal activity, and regulating the accountability and traceability of breeders. There are various distinct scenarios where puppies will be imported into the UK, not all of which are negative. It is important to note that commercial sales of animals can easily be distinguished from charitable and rescue activity, which, by definition, is not for profit. Puppies may also be imported where an individual completes a private purchase of a puppy from a breeder based abroad prior to the importation taking place and would either be travelling with the puppy, or would have arranged transportation through a DEFRA regulated animal transportation service. People repatriating to the UK may also import puppies that have been purchased abroad. NOTE: The importation of rescue dogs for rehoming should currently go through Balai as this is classed as a commercial activity (even though profit may not be the purpose of the activity).

The potential health issues arising from unscrupulous commercial importing of puppies intended for resale, for the animals involved and their prospective owners, transcend the legal status of the activity. It is possible for some breeders to trade their puppies in very unsatisfactory circumstances, exposing them to increased disease risks, but to do so legally. Puppies that have been poorly bred, ineffectively protected and tested against animal and zoonotic diseases, then transported long distances during their formative period (8-16 weeks), will typically suffer impaired behavioural and social development, commonly leading to lifelong impacts, with the likely results of not only potential disease spread in their destination country, but also higher likelihood of subsequent abandonment and euthanasia. This also has a potential emotional, financial, and health impact on those families who take in such puppies.

Unscrupulous commercial puppy trading is characterised by a lack of transparency and accountability from the breeder, often involving falsified records of puppies much younger than their stated age. Purchasers should see puppies with their mothers at the premises where they were born. This is a requirement of The Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018, but can be circumvented if breeders located outside England are permitted to import puppies for resale. Responsible, legal puppy sales must be endorsed and rewarded, and trading in circumstances that have negative impacts must be driven out, by taking all expedient measures, through legal or pragmatic routes.

‘Loopholes’ In The Third-Party Ban (Lucy’s Law)

In the 2019 Inquiry some attention was paid to “loopholes” for sellers to “get round” the third-party ban (Lucy’s Law). The suggestion that third-party dealers can evade the law by setting up as rescue centres is incorrect, even prior to Lucy’s Law. The ‘Business Test’ applied by the local authority can identify profiteering relatively easily, and this is not a practical problem. The claim that the importation and circulation of heavily pregnant bitches is a subterfuge to evade Lucy’s Law is also misconceived, as it is already illegal to do so under the pre-existing animal transport and dog breeding regulations.

However, since April 2020 it has emerged as mentioned above, that there is now one distinct loophole in Lucy’s Law. The 2019 amendment to the 2018 Regulations permits breeders to sell puppies under a pet sales licence, rather than a breeders licence, if the dog was bred overseas. This enables breeding to take place in facilities that can evade scrutiny and provide no guarantee of meeting English licensing standards. This alarming loophole was deliberately included, which was confirmed by DEFRA. The argument put forward is that it ensures compliance with European Union (EU) Directives and World Trade Organisation (WTO) rules, to preserve the level playing field required by EU and WTO law between EU members. These motivations will inevitably change as Britain exits the EU.

There were also concerns that the wording of the regulatory loophole was prompted by a suggestion that the supply of puppies in England must be maintained at some particular level, which is not evidenced, nor an absolute requirement, and certainly not at the expense of animal or human health and/or welfare. The effects of the deliberate drafting of the 2019 Regulations means that there are now effectively two distinct sets of standards for puppies sold in England depending on whether they are bred here or abroad. Under the former, strict scrutiny of the breeding premises is required, and the puppy can only be sold from the place of birth in the presence of its mother. Under the latter, these protections are absent, with all the potential for the negative consequences on puppy health and welfare, human health, as well as puppy socialisation highlighted above.

EFRA Select Committee Session 23 Oct 2019 Summary

This session represented a useful discussion of the trade in puppies imported legally and illegally from abroad, as well as our domestic supply. Significantly, there was a general consensus about the benefits of raising the minimum import age of puppies to at least six months, improving the traceability of the provenance of puppies, and further measures for the protection of dogs and UK public from serious disease. All of these interventions would require better and more practical enforcement at ports.

There were concerns also about the blurred lines between the abuse of the PET Travel Scheme (up to five pups with passports) and the Balai Directive (commercial trade). The mistruths spread about ‘loopholes’ regarding Lucy’s Law in the Inquiry have been dealt with above. A suggested measure to improve traceability is to consolidate numerous existing microchip databases run by multiple companies into a single database of dogs with recorded chip numbers, but there are challenges as to how such a project could be funded or managed.

The Inquiry also identified some of the more common practical challenges with detecting illegal puppy trafficking activity in the current system. Notably the multiple and generous opportunities for unscrupulous and fraudulent behaviour relating to the importation of puppies, primarily from Ireland and Eastern Europe, including documents, passports, as well

as identification and health checks that are, as mentioned during the Inquiry, frequently falsified, or just ignored. Microchip numbers are commonly not logged further reducing any traceability. Basic information is commonly not recorded, including the ages of animals, their country of source, and other pertinent information that could help control and prevent disease transmission. The EFRA Chair pointed out that the circumstances surrounding puppy movements are in stark contrast to the standards required for food animal imports and transportation. The age detection of puppies below six months, i.e. just from their primary dentition, is “extremely difficult” (BVA President) even by experienced veterinary professionals. This difficulty is reflected in omissions in the skillset of trained Border Force enforcement individuals that need addressing quickly, effectively, and inexpensively, with minimal strain on resources.

Current Legal Framework

The current legal framework for importing dogs falls under two separate regimes, the Balai Directive (92/65/EEC (as amended)) for what are termed ‘commercial movements’ and the Pet Travel Regulation (576/2013/EEC) for non-commercial. This proposal is concerned with the selling of puppies within the UK, therefore falls within the commercial import framework.

An activity will fall under a commercial movement if:

- The movements of groups of more than five cats, dogs, or ferrets per person travelling;
- The movement of cats, dogs, and ferrets involving a change of ownership and/or for rehoming, including rescue animals (see below);
- Pet animals that are not able to fulfil the requirement of the Pet Travel regulation for travelling within five days of their owner or owner’s representative.

There are various requirements for a commercial movement import, which vary depending on whether the animals are coming from the EU or approved third countries. Such requirements include:

Applicable to EU and certain approved countries:

- Rabies Vaccination after 12 weeks and wait 21 days after that (i.e. at least 15 weeks before fit to travel)
- Must come from a registered establishment
- Identified by a microchip

The above law has been transposed into the UK through The Trade in Animals and Related Products Regulations 2011.

The Rabies (Importation of Dogs, Cats and Other Mammals) Order 1974 adds further conditions that apply to movement of certain rabies susceptible animals, such a licence for imports from non-EU countries.

In addition the transport for live animals is covered by Council Regulation (EC) No 1/2005 on the protection of animals, which is transposed into UK law through respective Welfare of Animals (Transport) Orders. The Regulation and Orders has various general and species-specific guidance including:

- Fitness for travel
- Avoiding injury or undue suffering
- Adequate feed, water and rest

- Dogs and cats under eight weeks old cannot travel unless accompanied by their mother.

Demand For Puppies In The UK

Worryingly in the Inquiry, after estimating the current population of around nine million dogs in the UK, the word “need” was used in maintaining this population, including meeting a supposed “demand for at least 750,000 puppies per year”. This is possibly one of the most worrying statements from any key DEFRA-influencing stakeholder, and incorporates an unsubstantiated assumption that escalating levels of puppy imports from abroad is a response to a shortfall of puppies from domestic breeders (in fact the market dynamics may be that responsible breeders breed less if they are competing against immediately available, potentially cheaper no questions asked imports). A gap in the argument for supply to meet demand is there are no parameters on which to base any assessment, for instance what is considered an adequate timescale between decision and purchase?

Additionally for supply to ‘meet’ demand, on a practical level as breeding dogs is a natural process there will actually be a surplus, if every prospective purchaser is to have immediate buying opportunities. This of course raises an ethical dilemma where ‘surplus stock’ relates to puppies and leads to a situation of overpopulation. So the argument that demand must be met has some very serious implications.

Another aspect of this issue of supply, is that consideration must be given to which source is considered ideal for producing a family pet. Dog breeders are regarded in an increasingly negative light as evidenced by calls for further regulation (frequently based upon advertised puppy prices, with less consideration for the time, effort, and financial outlay made by many small-scale breeders).

If there is a genuine, evidenced basis for increasing the numbers of puppies bred in England, there should be measures for encouraging and supporting the most responsible and ethical breeders and not (as has been hinted in the Inquiry) large scale commercial units. The impact of further controls/registration/licensing of breeders may dissuade small scale responsible breeders and favour larger scale commercial enterprises with arguably a detrimental impact on dog breeding welfare.

Risks To UK Dogs And Humans Including Zoonoses

In these unprecedented Covid/global pandemic times as a direct result of animal to human disease transmission with heightened calls for biosecurity, the evidence highlighted in the Inquiry was deeply concerning. It pointed to puppies being bred abroad and only vaccinated once e.g. against Rabies, if at all, giving rise to huge, potentially fatal health risks to humans, dogs, and other animals in the destination country of the UK. Furthermore, a significant number of other serious and potentially fatal diseases, such as Leishmaniasis, Distemper, as well as tick-borne diseases Babesiosis, Ehrlichiosis, and also Echinococcus (also fatal to humans) are also not only capable of infecting our UK dog population, but also pose serious, life-threatening risks to human health as well.

The behavioural elements of poor breeding conditions are also potentially dangerous too, as peer reviewed studies have shown that poorly socialised puppies are at increased risk of becoming nervously aggressive, thus resulting in more dog bites to humans and other dogs. Unsurprisingly there can be traumatic and mental health implications for unsuspecting families (often with young children) taking such animals into their homes. These factors join the many others as being powerful incentives for urgent change.

The simplest and most pragmatic solution identified is to raise the minimum import age of puppies intended for resale, to at least six months, which importantly facilitates the preferable increased wait time post rabies vaccination(s) and essential serology/blood tests; encouraging increased levels of rabies protection by exceeding the maximum incubation period for rabies infection (supported by BVA, Dogs Trust, and others); with most cases of Rabies presenting 3-8/12 weeks post-infection.

As highlighted in the Inquiry, the current three week wait time post vaccination has absolutely no relevance to the incubation period of disease; therefore a wait of at least 12 weeks post serology is required to minimise risk to humans, dogs, and other animals in the UK. This increased delay before importation ensures that puppies grow beyond their critical “cute factor”, which can also be a key driver for unscrupulous trading, profiteering, animal cruelty, and disease risk.

Penalties/Deterrents

Criminal activity in animal importation is not effectively deterred by the legal procedures and penalties available. Prosecutions are a regulatory burden for enforcement bodies, and the sentences available do not represent a sufficient disincentive for the criminals. For example, in the Inquiry a three-month sentence was given as an example for illegal puppy trafficking compared to seven years for cigarette/alcohol smuggling.

Criminals are drawn to the high financial gains relative to the low punitive risks. It is not unusual to find that the criminals involved in one type of activity also have links to others, for example the movement of humans, drugs, and firearms. These are complex networks, often associated with gangs. There may be opportunities to amend the penalties available for association with unlawful activity. One example suggested was the seizure of the vehicle in which the animals were transported, and further interventions for tax evasion. This would require engagement with the enforcement authorities and amendments to penalties may require primary legislation.

Current Public Campaign To ‘Ban Puppy Imports’

Launched in the spring of 2020 in response to the tragic news of the death of celebrity Love Island couple Molly Mae and Tommy Fury’s Pomeranian pup ‘Mr Chai’, just six days after being legally imported from Russia via a UK-based puppy agent. Causes of death included deformed skull, likely parvovirus and distemper, zero white blood cell count, and seizures. Sadly many other examples followed both here and abroad, and all totally legal with zero accountability. In the summer of 2020, a shipment of 500 young (below six months) French bulldog puppies were flown in the cargo hold on a 10-hour flight from the Ukraine to Toronto, on arrival 38 of the pups were already dead with many of the survivors arriving dehydrated, vomiting and weak. The Canadian government responded immediately by increasing the minimum import age to eight months.

The #BanPuppyImports campaign, set up by a concerned member of the public from Preston, Lancashire, has enjoyed strong and sustained public support and media coverage with nearly 130,000 concerned animal-lovers signing the campaign’s government e-petition in its first few weeks, as well as huge celebrity support including from Ricky Gervais, Simon Cowell, Clare Balding, Rachel Riley, Deborah Meaden, Olly Murs, Olivia Newton John, Ellie Goulding, and many more. The campaign’s media partner The Mirror newspaper, pet industry supporters including Pets4Homes, Viovet, Agria Pet Insurance, Hownd, and other

popular forward-thinking ethical brands have also supported the campaign. Within the sector, the campaign has also been publicly supported by RSPCA, Battersea, and Kennel Club. The solution offered by this campaign is simple: raise the minimum import age to at least six months to ease enforcement as secondary/permanent teeth are visible, identifiable, and is the only information relating to that individual puppy that can't be falsified, meaning the risk of serious/zoonotic disease transmission of Rabies, Parvovirus, Distemper, and other diseases is minimised to humans, dogs, and other animals in the UK. Raising the minimum age to six months also makes sure puppies are robust and socialised sufficiently to withstand the long journeys from abroad, so minimising potential animal cruelty, reducing potential for financial and emotional distress for prospective owners in the UK, and of course removing the legal loophole provided for the sale of young (below six months) puppies away from their mothers and place of birth.

Legislative Solution Package/Way Forward

The loophole in the existing licensing regulations which DEFRA inserted desperately needs to be closed now to bring puppy buying into line with DEFRA's own advice, to always physically see mum interacting with puppy in the place he/she was born. The problems associated with imported puppies span both human and dog welfare, as well as public and animal health, including major concerns and risks regarding Rabies/other zoonoses.

Such serious risks to both human and animal health would be sufficiently addressed by raising the minimum age of a commercial import to six months. This is because, as Dogs Trust stated in the initial Inquiry, not only is the UK seeing an increase in emerging diseases including Ehrlichiosis, Babesiosis, Distemper (notably from unvaccinated dogs in Romania), but also regarding puppies transported below six months of age, they will be carrying a potential Rabies risk from counties where the disease is endemic; directly to humans and other animals in the UK. Therefore by increasing the wait time post rabies vaccination, and actually tie it in with the incubation period of disease, with most cases of Rabies presenting between 3-8/12 weeks post infection, i.e. not in the initial, current three week post-vaccination period), serious health risks to humans and animals in the UK are immediately and effectively mitigated.

There were also calls for a return of Rabies serology (confirmatory blood tests) with strong evidence showing that the one group of individuals that respond less well are young (less than six months old) puppies, with scientific studies therefore recommending young puppies less than six months are therefore given a primary course of two doses of vaccine, not just one as in current rules. Results of studies that compared homebred dogs to imported pups further revealed significantly different levels of Rabies protection. Employing a minimum 12 week wait post vaccine and serology (and therefore at least six months old) would make puppies almost guaranteed to not only be Rabies-free, but have minimal risk of infecting humans, dogs, or other animals in the UK. There also doesn't appear to be any opposition to a minimum age of six months for imports.

An additional problem of the current framework is correctly assessing the age of a dog. From all the evidence presented it's abundantly clear, and supported by consensus of major veterinary experts and relevant stakeholders, including BVA and Dogs Trust, that irregularities and illegal activities are fuelled by incorrect/fraudulent documentation, and misidentification of young puppy's primary dentition. The only reliable part of the puppy importing or smuggling process that can't be falsified is the aging of the puppy's teeth which must therefore be the starting point. By six months a puppy will have his or her secondary (permanent) teeth emerging which are much easier to identify and therefore use to estimate

a puppy's age compared to temporary (primary) teeth, also useful for teaching Border Patrol staff.

A recent DEFRA webinar highlighted EU phytosanitary measures to be released, including a promise of 100% physical checks on all live animals, a measure that should be adopted by the UK. Great Britain has already said there is no means to carry out the checks in January and is instead initiating a three-step process: Jan-March – no checks, March-July intermediate checks, and full checks from July.

Clearly this is not good enough. There should be 100% physical checks from January. Carrying out no checks will provide an obvious green light for smugglers. To avoid risks to health all imported dogs should be subject to physical checks to confirm their ages, as well as being checked with identification documents, microchip numbers, record of vaccination, etc.

The UK must also impose mandatory establishment listing requirements for every dog imported into the UK, with suitably vetted breeders added to a 'positive list' held and approved by DEFRA, to provide everyone breeding dogs abroad with a level playing field, who can send vets on site. Positive establishment listing requires official veterinarian audits and inspection, the outline of which will be determined by the Sanitary and Phytosanitary (SPS) Chapter of the EU-UK FTA. Breeders abroad may be inspected by British authorities, as they are currently inspected by EU authorities (FVO inspectors based in Grange, Ireland). This is a prerogative afforded by animal health /food safety legislation and referred to as 'third country audits'.

This prerogative will fall under DEFRA as of January 2021, although the current understanding is that the UK does not possess sufficient official veterinarians to both carry out customs inspections and third country audits. Simply amending the transport regulations or live exports will not be sufficient. If a high percentage of animals from a country are not in good health, that country or breeder can be flagged or put on a red list as creating an enhanced level of risk (e.g. have supplied sick puppies on more than 'X' occasions). Animals should only be allowed through certain ports where vets/trained professionals can inspect each animal, especially checking teeth, paperwork, and microchips.

The concern over how many puppies are "needed" per annum, even though the estimates stated are unreliable, is certainly never a reason to help maintain this cruel trade, which is rife with disease risk to both humans and animals, as well as high incidences of illegality.

There has been speculation that raising the minimum age for commercial imports would negatively impact the adoption of dogs into the UK from abroad. This is easily tackled by providing an exemption for such imports. Providing such an exemption is proportionate to the objectives of this proposal. Adopted dogs do not have the same welfare and disease risks due to reputable rehoming organisations having correct paperwork, microchip details, safer biosecure shelters protected from external disease risks, reliable documentation e.g. passports, and the appropriate well-established vaccination strategy and protocols already in place.

Finally, contrary to what may be suggested, requiring that puppies must be over six months to be imported for sale in Great Britain, does not constitute a barrier to trade. It instead provides a robust regime that instead should be seen as a way of not only improving the quality of dogs imported from abroad, who will be not only socialised by responsible breeders, therefore much more physically and mentally able to withstand long journeys, but also provide essential assurances that they are properly vaccinated and protected against serious diseases including Rabies that pose a genuine threat to humans and animals in the UK; thus making much better, safer, more successful, likely longer-living, healthier pets.

Legal Vehicles For A Ban

Aside from the travel regulations mentioned above, the legal framework for the commercial trade in animals is predominantly founded on public health concerns. As highlighted above, there is ample evidence that shows the current commercial trade in puppies is potentially a serious public health concern. It is therefore apparent that any restriction on this trade should be based on public health grounds, as well as tackling the obvious welfare concerns associated with the trade. Attaching any restrictions to public health concerns also has the benefit of falling within WTO exemptions.

Please note the options listed below apply from 1 January 2021 and may need to be amended depending on whether a deal is reached with the EU.

Option 1

Emergency Policy Position On All Commercial Imports Of Puppies From 1 Jan 2021.

This would be a policy position taken to either ensure certain legal requirements are being met or on the premise that some legal requirements cannot be met when commercially importing puppies. There is a precedent for such policy bans ahead of legislation. The Home Office had a policy ban from 1997 for the testing on great apes prior to a ban being directly enshrined in legislation. The great ape policy ban was on the premise that testing on great apes would not be able to satisfy the harm benefit assessment required ahead of granting an animal testing licence under Animal (Scientific Procedures) Act 1986. Similarly this happened with cosmetic testing in 1998 ahead of the EU wide ban. Neither applied to imports, just the licensing of domestic testing; however, the EU has since banned the testing and marketing (including from third countries) of cosmetics that have been tested on animals.

In order to have a policy ban there must be a legal hook that means a relevant action by the public body will or won't be carried out. In the case of live puppy imports there is the responsibility to provide a notification system for imports, licence imports under the Rabies Order mentioned above (this currently only applies to third countries) and carry out veterinary checks. In the event of a no deal Brexit, all imports of live animals will need to notify the Import of Products, Animals, Food and Feed System (IPAFFS) before they can come into the UK. It is also possible that all imports will require licences under the Rabies Order.

DEFRA could take a policy position that commercially traded puppies under the age of 6 months cannot be entered into the IPAFFS. The basis for this decision could be that they are unable to provide adequate physical veterinary checks of each shipment to address the public health concerns. Defra could also refuse to grant a licence to such shipments under the Rabies Order on the basis that they cannot satisfy themselves that the relevant conditions will be met for puppies under six months.

Option 2

Secondary Legislation

The requirement that dogs must be at least 15 weeks old before they can be imported into the UK is enshrined under Article 6 Regulation (EU) No 576/2013 (transposed via The Non-Commercial Movement of Pet Animals Order 2011), whilst this deals with the non-commercial import of pet animals, it is made applicable to the commercial import via Article 10 of the Balai Directive (92/65/EEC (as amended)) and subsequent compliant health certificates and rabies licences. The requirement is on the basis of the age a puppy can receive an anti-rabies vaccination (three months) and the period it takes to establish immunity (21 days).

The proposal is to increase the age that puppies can be imported to six months. Section 10 of the Animal Health Act 1981 allows a Minister to prohibit or regulate the import of an animal to prevent the introduction or spreading of a disease. This power was used to enable The Rabies (Importation of Dogs, Cats and Other Mammals) (Amendment) Order 1994 and The Non-Commercial Movement of Pet Animals Order 2011, both of which contain provisions on the current import age. This power could be used to increase the current age to six months by issuing a new order or amending the current Rabies Order.

Increasing the minimum age that puppies can be introduced into the UK will prevent the risk of the introduction or spreading of disease as it'll allow time for a primary course of two doses of Rabies vaccine to be administered, as well as tying in serology (blood tests) with a wait until the maximum incubation period has been exceeded; thus making imported puppies at minimal risk of being infected with, and passing on Rabie to humans, dogs, and other animals in the UK.

Alternatively, in line with Lucy's Law, The Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018 could be amended to include puppy imports and/or all sales as a licensable activity, with relevant WTO compliant conditions attached.

Option 3

Primary Legislation

Alternatively new legislation could be introduced to ban the import of puppies under six months for a combination of health and welfare reasons.

Summary

The government must now do what's right and prioritise animal health to protect consumers and public health by ensuring that all puppies under six months of age sold in England are bred and sold responsibly under English legislation, therefore the minimum age requirement for imported puppies post-Brexit must be at least six months. This rule/requirement must be stated in the pre-certification documents, and a vet/trained professional/Border Force should confirm the animal is not below that minimum age before and on arrival in the UK.

Secondary dentition ensures accuracy of checks, eliminates guesswork of any puppy's age, and ensures that any sick young puppy (under six months) purchased in the UK can be easily identified by his or her vet, traced back to its supplier/breeder, an investigation triggered, thus accountability and traceability preserved; meaning tougher route to market for easily-detectable illegally smuggled younger pups, and the whole process of responsible puppy buying falling in line with the protections provided by Lucy's Law.

Other essential factors also include establishments listings, pre-certification requirements, and 100% checks on arrival into the UK at BCPs (Border Control Posts). Talk of trade 'bans' on all puppies should be avoided at all costs, but instead refer to restrictions on the trade on 'young' puppies only (purposefully indicated in title of government e-petition 326261).

The focus should be on positive import requirements. Messaging around this includes: (1) Reducing health and zoonosis risks to human and canine population with improved biosecurity, (2) Tackling trafficking and illegal trade with concerns around public protection and associated criminal activities, (3) Improving transparency of the trade, breeder accountability and consumer protection. Accurately recorded microchip details and improved traceability should be included in the import certification requirements too. An incremental approach may be preferable.

Furthermore, with emphasis on human/public behaviour change going forward, we should be moving away from the concept that it's OK for dogs to be perceived as mere commodities that can be purchased on a whim, a product of one-click/impulse/delivery mentality we've got used to with fast food, and instead aim more towards a public that's encouraged to undertake more research, is prepared to wait, understands and is made aware of alternative options to buying including rescuing and fostering, and being able to choose from a higher quality pups for sale rather than sheer quantity of pups that are always readily available.

The six month minimum age proposal is supported by Dogs Trust, RSPCA, Kennel Club, BVA, Battersea, CFSG, APPG for Dog Welfare (APDAWG), APPG for Animal Welfare (APGAW), Advocates for Animals, UK Centre for Animal Law, as well as many more animal welfare and rescue organisations, cross-party MPs, and relevant voices; in fact there doesn't appear to be any opposition whatsoever in this sector or beyond.

Ideally DEFRA would give some indication to its commitment to raising the minimum import age of puppies to six months in the Inquiry on 24 November 2020, or instead plan an official announcement around Christmas, or at the very least launch a consultation/call for evidence in December.

November 2020