

Written evidence submitted by the Department for Environment, Food and Rural Affairs (PS0009)

Annex A:

Puppy smuggling and enforcement:

Background:

1. The illegal importation of pets is an abhorrent trade which causes suffering to animals and puts the health of pets and people in the UK at risk. In terms of the regulation and enforcement of non-commercial pet travel movements, we operate one of the most rigorous and robust pet travel checking regimes in Europe.
2. All pet animals entering Great Britain on approved routes under the non-commercial EU Pet Travel Scheme undergo documentary and identity checks, and the Animal and Plant Health Agency (APHA) works collaboratively with Border Force and other operational partners at ports, airports and inland, sharing intelligence to enforce the Pet Travel Scheme, disrupt illegal imports and seize non-compliant animals. Any animals found to be non-compliant with the Pet Travel Scheme rules may be refused entry or detained until compliant.

Data and impact of COVID-19:

3. Regarding changing levels of pet imports (both commercial and non-commercial) during the COVID-19 lockdown, APHA has confirmed that during the initial period of lockdown (March-April 2020), we saw a reduction of non-commercial pet movements. This increased to relatively routine figures as COVID-19 movement restrictions were eased.
4. On **non-commercial** pet travel, 14,718 pets were moved into Great Britain in March 2020. Numbers of movements then fell to 1,834 in April 2020 and rose to 4,810 in May 2020.
5. On the **commercial** imports of dogs under the Balai Directive, 1,987 dogs were imported into the UK in March 2020, falling to 934 in April 2020. Numbers of commercial dog imports are steadily rising again and sat at 6,826 for the month of September 2020.
6. Compared to 2019 there has been an increase in the intelligence led interception of vehicles carrying or suspected to be carrying puppies, both under the Pet Travel Scheme and also commercially. Consequently there has been an increase in the number of non-compliant puppies discovered which have been required to be housed in quarantine until they become compliant, demonstrating that the collaborative work between operational partners to disrupt illegal imports and prevent the entry of non-compliant animals has had a positive impact at an operational level.
7. Under the 'Dover Puppy Pilot' - a scheme designed to protect the welfare of smuggled puppies in conjunction with the Dogs Trust - from January to September 2019, 212 dogs were intercepted, 95 (45%) of which were quarantined. Within the same period this year, 516 were intercepted, of which 309 (60%) were quarantined. In all cases the reason the puppies were detained in quarantine was that upon inspection they were deemed to be younger than the

age given in their passports, and therefore under 12 weeks of age when the rabies vaccination had been administered.

Post-Transition Period:

Third country listed status

8. At the end of the Transition Period (TP), Great Britain and the Crown Dependencies (CDs) will become a third country for the purposes of the EU Pet Travel Scheme. There are three categories of third country which GB and the CDs could ultimately become; 'Part 1', 'Part 2' or 'unlisted'.
9. In February 2020 Defra resubmitted our application to the EU Commission to become a 'Part 1' listed third country. Acceptance of this application would mean very similar documentation and health requirements to those required now for pet owners travelling to the EU. Ultimately, health and documentary requirements for pet owners and users of assistance dogs will change depending on which category of third country we become.
10. The EU Commission has received our application and it is now for them to consider. We hope to hear the outcome shortly, and we will publish refreshed guidance when we do.
11. Defra is regularly liaising with key stakeholders to ensure travellers with pets and users of recognised assistance dogs are prepared for any scenario. Our current messaging asks those intending to travel with pets to speak to their vets four months in advance of travel. We launched this messaging in early August 2020 through engagement with sector stakeholders, carriers and assistance dog charities, direct email communications to approximately 18,000 vets and social media posts. We also updated our GOV.uk page which has now been viewed over 100,000 times."

NI Protocol

12. There is no justification for significant changes to pet movements between Great Britain and Northern Ireland. They should continue in a very similar way to the present arrangements.

Plans post-Transition Period

13. To minimise disruption post Transition Period, there will be no change to the current health or documentary requirements for pets entering GB from 1 January 2021. We are preparing legislation to accommodate this.
14. After 1 January 2021 we will review our current pet travel rules. We are listening to the concerns of stakeholders around future requirements and the Government is developing a range of options to strengthen our efforts to tackle puppy smuggling, taking into consideration the recommendations of a variety of stakeholders and the previous recommendations of the Committee.

The impact of COVID-19 on companion animal welfare charities:

15. As set out in our response to your letter of 21 July (**Annex B**) about the impact of the Covid-19 pandemic on the companion animal welfare sector, this is an issue that Defra has been monitoring closely since the start of the pandemic. The Government recognises that the Covid-19 pandemic, and the measures put in place to control the spread of the virus, continue to affect individuals, businesses and charities caring for animals.
16. Defra officials continue to engage frequently with leading representatives from the sector and major animal welfare charities to listen to their concerns, monitor issues and offer appropriate advice. This includes Chris Laurence, Chair of the Canine and Feline Sector Group (CFSG), David Bowles, Head of Public Affairs at the RSPCA and Claire Horton, CEO of Battersea Dogs and Cats Home, who also sits on the Animal Health and Welfare Board for England and is Chair of the Association of Dogs and Cats Homes.
17. Lord Goldsmith met with the CEOs of the major equine welfare charities in the UK in September to talk about their concerns for the winter period ahead and capacity of the rescue sector to cope with any increase in welfare cases or horse abandonments. This included World Horse Welfare, Blue Cross, the RSPCA, Redwings Horse Sanctuary, the Donkey Sanctuary, the SSPCA and British Horse Society. Discussions with equine welfare charities on the issues they have raised are ongoing at an official level.
18. Through the CFSG we have been made aware that charitable providers of veterinary care (such as the PDSA) are finding it challenging to deliver a full range of services, including preventative care such as vaccines and neutering. This is due to the working restrictions associated with the pandemic and the need to prioritise emergency treatments and essential care. Charities like the PDSA are predicting that demand for their services from those struggling financially will grow over the coming months due to the economic impacts of the pandemic.
19. It has been encouraging to see the sector working collaboratively to safeguard the welfare of animals in their care in the face of real financial hardship and uncertainty. The sector continues to keep us informed on the status of the emergency grants established to support numerous smaller organisations, including ADCH's Coronavirus Emergency Fund and the Covid-19 Equine Rescues Emergency Fund established by the Petplan Charitable Trust (PPCT) together with World Horse Welfare and the National Equine Welfare Council.
20. The Government appreciates that demands on the sector have not eased during this challenging time, particularly as attempts to get back to a state of normality have been disrupted by the repercussions of a second peak. There have not been further surveys of rescue and rehoming charities conducted since those published in May. The greyhound sector is reporting an increase in the number of retired racing greyhounds being rehomed which is believed to be attributable to both the introduction of the Greyhound Retirement Scheme (GRS) and an increase in demand for pets as a result of lifestyle changes brought about through the pandemic.
21. We are committed to continued engagement with the sector to understand the longer-term impacts of the coronavirus pandemic and to monitor the animal welfare implications of this.

The effectiveness of recent measures including Lucy's Law and the Petfished campaign, plus any proposed measures:

22. The ban on commercial third-party sales of puppies and kittens was introduced through an amendment to the Animal Welfare (Licensing of Activities Involving Animals) Regulations 2018 (the 2019 Regulations), which are enforced by local authorities. Under the 2018 Regulations the Secretary of State must, from time to time, carry out a review of the regulatory provision contained in these Regulations, and publish a report setting out the conclusions of the review. The first report must be published before 1 October 2023.
23. We are currently at an early stage of implementation (six months since the ban came into force), and the Covid-19 pandemic has had a significant impact on supply and demand of puppies during this period. A full evaluation undertaken at a suitable point in the future would benefit from a stronger evidence base than an initial evaluation undertaken now.
24. In addition to, and ahead of, the ban on commercial third-party sales of puppies and kittens coming into force in England, my Department launched a national communications campaign (Petfished) to raise awareness of issues associated with low-welfare and illegal supply of pets. This includes providing clear signposting on where responsible breeders can be found and encouraging the public to research the seller.
25. Following its launch in March 2020 the Petfished campaign secured over 80 pieces of media coverage with a potential reach of just under 500 million, including the Chief Veterinary Officer giving interviews on BBC Breakfast and Sky News. We have run adverts on Google, Bing, Facebook and Instagram which have generated over 80,000 clicks to the website. Defra social media channels promoted the campaign with a potential reach of over 206,000 followers and 68,000 engagements on content (likes, comments, retweets). Petfished also had a presence at Crufts in 2020, organising a photo call with spokespeople and playing the campaign's hero video in the main arena.
26. The canine and feline sector and the veterinary sector are crucial in amplifying the campaign further. Petfished works in partnership with charities, private bodies and commercial organisations to leverage their channels and reach prospective owners. Reporting suggests at least 49,000 clicks to the website have been achieved through partner engagement/support.
27. In terms of effectiveness, we have noticed the dissemination in the media and by stakeholders of our call to action for prospective buyers to 'research the seller', a message first emphasised by the Petfished campaign. At its conclusion Petfished will formally measure its success in relation to how many people recall the campaign and in relation to shifts in awareness about low-welfare sellers.



Department
for Environment
Food & Rural Affairs

The Rt Hon George Eustice MP
Secretary of State for Environment,
Food and Rural Affairs

Seacole Building
2 Marsham Street
London
SW1P 4DF

T 03459 335577
defra.helpline@defra.gov.uk
www.gov.uk/defra

Neil Parish, MP
Chair
Environment, Food & Rural Affairs Committee
Committee Office
House of Commons
London, SW1A 0AA

10 August 2020

Dear Neil,

Thank you for your letter of 21 July about the impact of the Covid-19 pandemic on the companion animal welfare sector. It is an issue that my Department has been monitoring closely since the start of the pandemic, and I am grateful for the Committee's interest in the matter.

You have asked for my Department's assessment on a number of areas, which I have responded to in turn in the attached annex to this letter.

I can give my assurance that my Department continues to work closely with the sector to understand the longer-term impacts arising from these unprecedented times and I would be happy to update you on this in the future.

With best wishes,

RT HON GEORGE EUSTICE MP

Impacts of the Covid-19 pandemic on the companion animal sector in England

Government response

Impacts on, and dialogue with, the sector

Defra are acutely aware of the impact that Covid-19, and specifically the restrictions imposed to stop the spread of the disease, has had on the companion animal welfare sector. Defra have a strong relationship with the sector which includes regular engagement. Since March Defra officials have worked closely with leading representatives including Chris Laurence, Chair of the Canine and Feline Sector Group (CFSG) and Claire Horton, CEO of Battersea Dogs and Cats Home, who also sits on the Animal Health and Welfare Board for England, advising Ministers on companion animal welfare issues and additionally is Chair of the Association of Dogs and Cats Homes (ADCH).

The sector has kept us regularly updated on their analysis of the developing situation, sharing their surveys of the sector, particularly with respect to rescue and rehoming of companion animals, and in addition we have maintained a regular dialogue with the pet industry, local authorities and the veterinary sector who are all affected.

Our regular dialogue has enabled Defra to keep a close watch over the sector and understand emerging concerns and impacts to organisations and the animals in their care. Lord Goldsmith held a meeting with the Chief Executives of the main animal welfare charities in early May to discuss the impacts on the sector. This included Battersea Dogs and Cats Home, Blue Cross, Dogs Trust and the RSPCA.

From our engagement with the sector, we understand that during the initial, strictest, lockdown phase, animal welfare charities were severely impacted. Rescue and rehoming of companion animals and income generation via their networks of charity shops ceased and staffing was prioritised towards meeting the needs of animals in their care. In response, we worked closely with the sector through the Canine and Feline Sector Group to agree guidance to animal rescue and rehoming organisations, and other animal charities and businesses to enable them to undertake core operations as far as possible, whilst maintaining compliance with the social distancing rules and need for hygiene precautions to help prevent the spread of Covid-19. As the lockdown eased we quickly agreed updates to this guidance to facilitate further normal activities to re-start. The sector has been appreciative of our close working to enable their operations to return as soon as practically possible.

Impacts on the welfare of companion animals

The welfare of companion animals was, and still is, a priority for Defra throughout the Covid-19 pandemic. Defra have worked closely with CFSG, the companion animal veterinary sector as well as the Devolved Administrations to ensure that the welfare of companion animals is protected. This included publishing Government guidance for people who are responsible for animals, which is available online (<https://www.gov.uk/guidance/coronavirus-covid-19-advice-for-people-with-animals>). This guidance has been regularly updated in line with the changing position related to lockdown and the Covid-19 response.

Welfare related concerns flagged to Defra included the ability of people showing symptoms of Covid-19 and/or self-isolating or hospitalised to be able to get support for care for their pets, such as dog walking and feeding their pets. More recently the guidance was updated to take account of the case of a cat testing positive for Covid-19.

We have worked closely with CFSG on the position of pet businesses such as pet food suppliers, pet groomers, dog walkers, breeders and animal boarding establishments. We agreed a package of guidance for these businesses and operations to take place where possible and ensuring consistency with the requirements for social distancing and good hygiene. As a result, pet shops were able to remain open and supply pet food, pet groomers were able to visit people to undertake essential grooming for welfare reasons, and those hospitalised had access to pet boarding, dog walking or dog day care to ensure the welfare of their pets.

Financial needs of the sector

As your letter acknowledges, the Government has worked tirelessly to help businesses and charities manage the impacts of Covid-19. Many animal welfare organisations have taken advantage of the Coronavirus Job Retention Scheme. According to data provided by the ADCH, over half of animal charities were able to furlough some staff to reduce costs, with 12% of charities furloughing to over half of their pre-Covid-19 staffing levels.

Charities have also been eligible to apply for a range of other support schemes. In addition to the Job Retention Scheme, this includes VAT deferral, Business Rates Relief, the Business Interruption Loan schemes and the option to reclaim the costs of Statutory Sick Pay. Some of the animal welfare charities have additionally been able to apply to the Retail, Hospitality and Leisure Grant Fund in respect of their charity shops.

When Lord Goldsmith met the welfare charity CEOs, they were concerned about potential delays in processing legacies, which are an important source of income. We raised this with HM Courts and Tribunal Service (HMCTS) who explained that there was a delay to probate applications when changes were made to the systems used last year but waiting times have now greatly improved, and applications were not delayed as a result of the outbreak. HMCTS are doing everything possible to continue to reduce waiting times for probate applications, including adding more staff and as a result have seen significant improvements in performance. HMCTS will continue to monitor the situation carefully and take any action necessary to keep waiting times under control.

The CEOs were also concerned about the cost of and access to veterinary medicines. In response, Defra's Veterinary Medicines Directorate introduced several easements including temporary changes to the retail supply of veterinary medicines and allowing suitably qualified persons to prescribe and authorise supply of veterinary medicines remotely. Allowing non-veterinary surgeons to administer certain medicines reduces the cost of administering them, and subsequently reduces the cost to welfare charities.

We recognise that the sector includes numerous smaller organisations, and that not all organisations within the sector are registered charities. For the smaller rescue organisations, the sector itself responded very quickly to the pandemic with emergency grant funds established. This included the Support Adoption for Pets' £400k scheme and the ADCH's Coronavirus Emergency Fund, which was prioritised to give those in most need the appropriate support. The National Equine Welfare Council (NEWC) also set up a fund for equine rescues and RSPCA has given out £1 million to 17 RSPCA local rescues.

Battersea Dogs and Cats Home, Blue Cross, Dogs Trust, and RSPCA, as part of their requirements to operate as a charity, carry significant reserves, which has meant they are in a stronger position to weather the immediate impacts of Covid-19. RSPCA have recently announced a review of its work and role to potentially reduce costs, which was under consideration before Covid-19. However, we are acutely aware from our ongoing

engagement with the sector that the full impacts of the pandemic are yet to be felt and Defra will remain in close contact going forwards.

The EFRA Committee letter raises the Committee's concern that, whilst the support available to zoos from the Government is welcomed, there is no equivalent financial assistance available to animal charities or other animal related businesses. This was considered at length within all relevant parts of Government. We recognised that the zoo sector, in the absence of any income from visitors, was in critical need of financial support to meet the very high costs of caring for their animals. Whilst it is appreciated that the animal welfare charities have significant costs relating to animal care, there was no evidence presented via our intensive engagement, that the sector could not meet these demands in the immediate term. In addition, the funding and income streams of animal welfare charities and zoos are very different.

Government recognises that there are likely to be significant future demands on the sector as we attempt to get back to a state of normality and that these impacts will continue for some time beyond the immediate end of the pandemic. Whilst many rescue organisations reported a reduction in the number of stray dogs during the height of the pandemic, there was an increase in demand for pets both for purchase and rehoming, and the feline welfare sector is concerned that a scaling back of veterinary activity to essential work may have left more cats than normal unneutered, which could lead to more stray cats in the future. Economic pressures on people in the future may also lead to more demand for veterinary help and potentially more animals ending up in the care of rescue centres. Consequently, ADCH has told us that it will launch the next phase of their critical support scheme in late August, when all rescues will be able to apply for funding. It is expected the funding period will extend into 2021 to meet longer term demands.

Defra officials met the equine charity CEOs in June for an initial meeting to discuss the impacts on the equine welfare sector and a meeting with Lord Goldsmith will take place in early September. Defra understands that equine charities are operating at almost full capacity, but this is currently manageable, but there is concern that autumn and winter weather will make it more difficult to manage the number of equines needing assistance.

Puppy smuggling, puppy farming, puppy farmers and other unscrupulous domestic pet breeders

The EFRA Committee Chair has additionally asked whether there has been an increase in unscrupulous activity related to puppy smuggling and puppy farming. Some of the charities reported that demand for pets increased during the Covid-19 lockdown period. This may have been due to people spending more time at home and considering it a positive time to get a companion animal. Defra has been told that prices for some dogs increased markedly over this period, and we accept that there is real risk that unscrupulous breeders and sellers would have taken advantage of the situation. In response to this, Defra brought forward the second phase of our #Petfished communications campaign, which launched in March 2020. This campaign aims to educate the public on responsible acquisition of companion animals.

The Defra-funded Petfished campaign has been well received and is supported by the companion animal welfare sector. It coincided with the ban on commercial third-party sales of puppies and kittens, also known as Lucy's Law, which came into force in England on 6 April 2020. The key messages of the Petfished campaign are for the public to be aware of deceitful sellers, and to raise awareness of the potential ways in which these unscrupulous sellers attempt to mislead buyers, and includes a comprehensive website, which can be

found at www.getyourpetsafely.campaign.gov.uk. The campaign includes the memorable acronym SPOT:

- **Seller** - Put the seller's name and phone number into a search engine – avoid those with multiple adverts;
- **Parent** - Make sure you see puppies and kittens in their home with their mother;
- **Old enough** - Check puppies and kittens are at least 8 weeks old before you take them home.
- **Treatment** - Ask to see the animal's health records and avoid sellers who can't provide them.

As the Committee will be aware, the Government has committed to cracking down on puppy smuggling. It is an issue Defra Ministers take very seriously, and we are pleased that the Committee previously received written evidence from Defra on this matter.

In relation to puppy smuggling we noted a small increase in the number of illegally landed dogs entering Great Britain during the Covid-19 lockdown compared to the same period last year. Between March and July 2019 there were 184 illegally landed dogs, compared to 251 during the same period in 2020. It is important to note, however, that the definition of 'illegally landed' does not necessarily mean the animal was smuggled into Great Britain. The definition of an illegal landing is any dog, that is landed in Great Britain which does not meet the import requirements and therefore requires quarantine under the Rabies Importation Order. While these figures may include some smuggled animals, it also includes pet animals that arrive at GB airports and during the pets check are found to be non-compliant and animals that are found 'inland' and after a trading standards investigation are found to be non-compliant. For the commercial import of dogs, cats and ferrets under the Balai Directive, inspection of the health certificates of these movements has continued to be carried out during lockdown to ensure issues of non-compliance are identified and dealt with appropriately.

Since the start of the pandemic, we have seen a reduction in the number of non-commercial movements of dogs via the EU Pet Travel scheme. In May 2019 nearly 20,000 travelled. In May this year, it was around 4,500. We have the most rigorous pet border checking regime in Europe and have been working closely with operational staff to ensure we deter against any illegal trade during these unprecedented times and take appropriate enforcement action.

Department for Environment Food & Rural Affairs
August 2020