

Written evidence submitted by The Kennel Club (maab0030)

1. The Kennel Club is the largest organisation in the United Kingdom (UK) devoted to dog health, welfare and training. We run the UK's largest registration database for pedigree dogs and an activity register for crossbreeds, and are the only organisation accredited by the United Kingdom Accreditation Service (UKAS) to certify dog breeders under our Assured Breeders scheme. As such, we represent the voices of dog breeders, exhibitors and owners across the UK.

Executive summary

2. Since the end of the Brexit transition period, there have been significant changes to pet travel from Great Britain (GB) to Northern Ireland (NI), despite commitments made by the Government before this Committee last year. These changes will, in practice, significantly restrict and potentially stop the legitimate puppy trade between puppy buyers and breeders on both sides of the Irish Sea. Compared to breeders and purchasers in GB, those in NI will ultimately be the most likely to suffer as a result of restrictions. As well as this, dog owners and those involved in canine activities travelling from GB to NI will be required to comply with financially burdensome and unnecessarily onerous new rules and checks, once the education phase ends in June 2021.
3. The Kennel Club believes that the new pet travel border between GB and NI must be removed as swiftly as possible, with a return to free movement of dogs across the whole of the UK.

What impact will the new UK-EU agreement have on moving animals across the Irish border and between GB and the EU/NI?

4. The new regulations will have a significant impact on those travelling from GB to NI or the European Union (EU), the numbers of which are expected to increase both during and after the pandemic¹. GB-based dog owners will now be required to obtain an Animal Health Certificate from an official veterinarian no more than 10 days before each journey, which typically cost in excess of £100 per issue. Dog owners will also be required to take their dog to a veterinarian for tapeworm treatment between one and five days prior to entering or re-entering NI. Although dog owners based in NI remain within the EU's pet passport scheme, those dog owners spending more than five days in GB will need to identify a veterinarian in GB to administer treatment before their return to NI.
5. The new regulations also have a number of concerning implications for both breeders and puppy purchasers in NI. The vaccination requirements contained within the pet travel rules have introduced a 15 week minimum age limit for puppies to enter NI from GB. This minimum age limit is seven weeks later than the recommended age for placing a puppy in a new home. Puppies separated before eight weeks may develop concerning behavioural problems as they will likely not have gained the necessary life skills from their mother. On the other hand, should a puppy be rehomed at a later point, such as beyond its developmental period of 16 weeks, it will not have been

¹ <https://www.bbc.co.uk/news/business-55826646>

able to develop positive associations with both its new home and owner, and is likely to experience separation anxiety.

6. The extended period by which the breeder would be required to look after a puppy will result in increased costs and significant effort to ensure the puppy receives adequate socialisation and training. As well as this, the breeder would need to take the puppy to a veterinarian a minimum of three weeks before travel for a rabies vaccination and then again between one and five days before travelling from GB to NI in order to administer worming treatment and obtain the required paperwork. Whether the breeder bears this cost, or requires the puppy buyer to cover these costs in advance of collecting the puppy, there will be increased risks of financial disputes and more opportunities for fraudsters and scammers.
7. GB-based breeders who agree to arranging a purchase with NI-based buyers will be taking a significant risk: if the purchase was to fall through, the breeder would be left trying to sell a 15 week old puppy which will have received unnecessary medical treatment.
8. We believe that GB-based breeders will ultimately choose to sell to buyers in GB rather than to a potential buyer in NI due to the unnecessary complications and increased risk of any sales. Given the relatively limited amount of puppy breeding and limited range of dog breeds that are bred in NI, the impact of this will significantly limit the availability of high welfare puppies for Northern Irish buyers and will introduce another barrier to responsible puppy buying.
9. From a buyer's perspective, there may only be a minimal number of active breeders of the particular breed that they are seeking to buy: for example, over a ten year period, only eight Greyhounds and ten Japanese Shiba Inus were registered by Northern Irish breeders with The Kennel Club². As such, puppy buyers looking to purchase such breeds have relied on being able to source dogs from GB-based breeders and bring them back to NI.
10. The 15 week minimum age limit currently only applies for puppies being transported from GB to NI, so at first sight it would appear that NI based dog breeders will be largely unaffected by the new pet travel border. However, many NI-based breeders will, either through the sales contract that they use or due to existing consumer protection law, be required to offer buyers the option to return and refund their puppy purchase. Given that a breeder would seek to home their puppies at eight weeks, this could result in a buyer wishing to return a puppy to the breeder but being unable to do so for a period of up to eight weeks. This could result in disputes arising over whether the breeder or buyer is responsible for covering the costs of looking after the puppy and who must bear the costs of complying with the legal requirements to return the puppy across the GB-NI border, as well as potentially resulting in higher abandonment rates.
11. As well as the aforementioned examples, we believe that the new rules will negatively impact those involved in dog showing and canine activities, who often take a number of repeat trips with multiple dogs between GB and NI over a short period of time. For those based in GB, they will now be required to visit a veterinarian to obtain

² The Kennel Club Breed Registration Statistics, 2007-2017

an Animal Health Certificate for each dog *per journey* to NI. While NI-based dog owners will only be required to obtain a single NI pet passport regardless of whether originating from GB or NI, dog owners will need to visit a veterinarian to get worming medication administered prior to every (re)entry into NI. We have heard from many people in this position who are understandably upset and overwhelmed by both the financial burden and concerns of the impact of over medicating their dogs: for many, their participation in these events is more than just a hobby and their lives will be greatly affected by the barriers in place.

12. We anticipate that the new requirements for dog owners travelling to NI will have a substantial impact on the Northern Irish tourism industry. Evidence suggests that dog owners make up a significant proportion of those who holiday domestically each year³, with these numbers predicted to increase further in the foreseeable future as a result of the pandemic. Given that GB-based dog owners will now have to visit a veterinarian, with the associated time and financial implications, we anticipate that this is going to significantly lessen the attractiveness for GB-based dog owners holidaying in NI. In turn, this could have a considerable economic consequence on tourism in NI and the local economies who rely upon British holidaymakers.
13. Those who rely on assistance dogs – from guide dogs and hearing dogs, to medical detection and seizure alert dogs – will rely on bringing their dog with them on every single journey when travelling between GB and NI. For those who regularly travel between NI and GB in the course of their work, the impact could be very significant. If the journey forms part of their commute to and from work, the additional cost may make their journey, and therefore their employment, unviable. For the self-employed, their business may no longer be competitive as they have to cover considerably more costs to ensure the assistance dog is compliant with pet travel requirements than their competitors. For employees who are required to travel between GB and NI in the course of their employment, we assume that employers would be required to pay to ensure that an assistance dog meets the new pet travel requirements. For small businesses, these increased costs could be incredibly difficult to cover and could have a number of negative consequences.
14. To remove these barriers, we would urge the UK Government to work closely alongside the EU to remove the complex and unnecessary pet travel border from GB to NI, with a return to free movement of dogs across the whole of the UK.

How should the Government balance animal health and welfare alongside economic interests?

15. The movement of dogs between different constituent parts of the UK, such as from England to NI, presents a very limited disease risk and thereby little risk to animal health, yet there exists significant economic interest in ensuring unfettered and equitable access to all parts of the UK for dog breeders, exhibitors and owners alike. In contrast to this, dogs imported to the UK from further afield pose a considerably increased risk of disease and a substantially decreased legitimate economic interest. As such, the Government must seek to protect animal health and welfare whilst ensuring frictionless travel between GB and NI to protect economic interests – not just for those within the dog world, but also for those subsequently impacted by restrictions, including dog-friendly hotels and event organisers.

³ <https://www.condorferries.co.uk/pet-travel-statistics>

How will GB leaving the EU Pet Travel Scheme affect both legal and illegal movements of animals between GB and the EU/NI?

16. The previous single pet travel area between GB and NI has now been separated and in its place a new pet travel border has been erected which did not previously exist. Now, GB-based dog owners wishing to cross this new pet travel border will be required to comply with significantly increased financial and administrative burdens, including health testing requirements. Had the UK Government been able to achieve Part 1 listed status under the EU's pet travel regime, as opposed to its current Part 2 listed status, the costs and burdens faced by those travelling with dogs between GB and NI would not have been nearly as significant as they are now. However, there would still be a barrier to movement where previously no restrictions existed.
17. With GB no longer part of the EU's Pet Travel Scheme, those legally travelling with dogs out of GB to either NI or the EU must now comply with significantly more burdensome requirements than before. Dog owners travelling to the EU will face substantially increased costs due to the requirement of a new Animal Health Certificate per dog for every single journey. Dog owners will also no longer be able to take pet food containing animal by-products with them when travelling with their dogs to the EU⁴, barring an exemption for no more than two kilograms of pet food where there is a veterinary or other health-related justification. It is entirely possible that increased border checks looking for pet food at the EU border may increase journey times for GB-based pet owners seeking to travel to the EU and/or NI.
18. With regard to illegal movements, we are not aware of evidence which demonstrates significant levels of illegal exports from GB into the EU prior to GB's exit from the Pet Travel Scheme. However, it has been widely acknowledged that illegal importers were consistently abusing the scheme as a route to import puppies, including those that were underage or had severely compromised health, into the UK. It was also recognised that puppy importers were importing commercial consignments under the Pet Travel Scheme framework, instead of the Balai Directive, which in turn raises serious implications for both the welfare of puppies and disease risk.
19. Following GB's exit from the EU's Pet Travel Scheme, we are not aware of any consequential changes or divergence from the previous EU rules regarding bringing pet dogs – or cats and ferrets – into GB. Therefore, we are currently not aware of any new impacts to both the legal and illegal movement of animals from the EU into GB.
20. However, while NI remains within the EU Pet Travel Scheme, the implementation of any new rules which solely apply to imports from the EU directly into GB may not have the desired impact. Existing rules relating to minimum age and the number of puppies that one individual can transport under the Pet Travel Scheme will remain unchanged between the EU 27 and NI. Once these puppies have been *legally* imported into NI, it will be relatively straightforward to move these puppies into GB unless significant new checks are introduced.
21. For example, it is currently legal to bring pet dogs from the island of Ireland to GB via private boats and planes. Although there is currently limited evidence of puppies being smuggled from the island of Ireland via private boat, there are previous reports

⁴ https://europa.eu/youreurope/citizens/travel/carry/meat-dairy-animal/index_en.htm

of this occurring⁵. This may be partially due to a current lack of justification to undertake such journeys due to existing porous borders.

22. However, should a significant restriction be imposed for importing dogs from the EU directly into GB – such as from Calais to Dover – it is likely that smugglers and importers will inevitably seek alternative routes. We would anticipate seeing puppy imports being diverted via the Republic of Ireland, through NI, and into GB. Journey times will be significantly lengthened, which will consequently have a number of serious negative implications for both the health and welfare of the puppies being transported.

23. Thus, although the UK Government is now able to alter rules for pet imports from the EU into GB, we question its ability to introduce meaningful, positive change in practice whilst pet movements into part of the UK remain under EU rules. Any change in rules will inevitably result in significant, routine checks being imposed for each journey from NI to GB.

Are the current rules and checks on the movement of domestic animals strong enough to prevent illegal activity? If not, what could be improved?

24. No. Other animal welfare organisations, such as Dogs Trust⁶, have frequently exposed the shocking level of illegal importations of dogs into the country. The penalties for those found guilty of illegally importing or smuggling domestic animals are minimal in comparison to the potential profit margins for illegal importers. Consequently, we would welcome stronger penalties for those found guilty of illegal importation and have repeatedly advocated for more controls on the importation rules for puppies, including limiting the number of puppies that can enter the UK. However, for the reasons previously covered, restrictions that we may wish to see regarding the importation of puppies from the EU into the UK may not be possible to deliver in practice – particularly given the pet travel rules agreed within the NI Protocol – or may overall negatively impact puppy welfare.

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⁵ <https://www.bbc.co.uk/news/uk-scotland-glasgow-west-39854370>

⁶ <https://www.dogstrust.org.uk/news-events/issues-campaigns/puppy-smuggling/>