

Written evidence submitted by Dogs Trust (MAAB0048)

About Dogs Trust

Dogs Trust is the UK's largest dog welfare charity. We have twenty rehoming centres across the UK, through which we normally care for around 14,000 dogs each year. Since Dogs Trust was founded in 1891 (formerly National Canine Defence League), we have always campaigned on dog welfare issues and played an instrumental role in the introduction of the Animal Welfare Act 2006.

Executive Summary

- Dogs Trust welcomes the opportunity to respond to the EFRA Committee's inquiry on moving animals across borders, as we strongly believe the current checks and controls on both commercial and non-commercial movements of dogs are totally insufficient to protect their welfare
- Dogs Trust has carried out five undercover investigations exposing the abuses of the Pet Travel Scheme by criminals using the scheme to traffic underage puppies into Great Britain for sale. Our investigations have exposed horrific breeding and transport conditions for the dogs involved; ineffective border controls and enforcement of PETS at UK ports; and a lack of sufficient penalties to deter the trade
- The Government must take long overdue action to increase the penalties for those caught illegally importing dogs into the UK, as well as take the opportunity now the UK has exited the EU to strengthen our pet travel legislation by increasing the age at which puppies can be imported into the UK from 15 weeks to six months, making them less desirable for purchase
- The checks on commercial imports of dogs are even less stringent, with these taking place at the point of destination rather than the point of entry. APHA have previously admitted that in normal times less than 10% of checks take place and even more worryingly that checks have stopped entirely during the Covid-19 pandemic
- Following the UK's exit from the EU there are new requirements for the commercial movement of dogs and Border Control Posts (BCPs) are to be introduced. Dogs Trust believes there is a crucial opportunity to significantly improve checks on commercial movements of dogs by introducing these at the point of entry at the BCPs. However, we are seriously concerned that the necessary planning and preparation has not yet taken place to enable this to be properly implemented. The checks at BCPs were expected to be phased in from April 2021 and be fully introduced by 1st July 2021. However, on 11th March it was reported¹ that the first checks on EU goods coming into the UK will now begin in October 2021, six months after they were originally planned to be introduced, and will be phased in until March 2022. This follows warnings from the ports that the facilities needed to carry out checks will not be ready by July 2021. We strongly urge the Government to allocate the necessary resources to ensure appropriate checks can be undertaken at BCPs as soon as possible

¹ <https://www.politicshome.com/news/article/government-delays-eu-import-checks-amid-warnings-of-food-shortages>

- In the meantime, we question why and how commercial shipments are currently entering Great Britain via road, as the only legal route to the UK for commercial imports at present is via the already working BCPs at Gatwick, Heathrow, Manchester or Edinburgh airports.
- The increased number of dogs entering the UK via both commercial and non-commercial legislation, together with concerns about compliance with and enforcement of the legislation, presents a disease risk. We urge the Government to introduce the measures we have outlined in our response to prevent the entry of diseases which are not endemic in the UK from entering, and to improve traceability of dogs entering the UK so a system is in place in the event that a non-endemic disease does enter. This should include a centrally accessible database for logging microchip numbers and date of entry, at the point of entry into the UK.

Background

For more than six years, Dogs Trust has been lobbying Government for changes to the Pet Travel Scheme (PETS) after the EU harmonisation of the UK travel rules in 2012 led to a significant increase in underage puppies being imported into Great Britain for sale. The new rules enabled puppies as young as 15 weeks to obtain passports and travel to the UK when previously the minimum age had been 10 months. This means puppies can now enter the country when they are younger and more desirable to potential buyers.

Unfortunately, these changes resulted in a drastic increase in the number of puppies entering Great Britain for sale. There was a 61% increase in the number of dogs entering Great Britain via PETS in the first year after the relaxation of the controls. However, the increase was even more significant when looking at individual countries. For example, there was a 780% increase in Lithuanian dogs travelling under PETS into Great Britain between 2011 and 2013.

Annual Pet Travel Scheme (PETS) figures for dogs travelling into Great Britain	
2011 (<i>before changes to PETS</i>)	85,299
2012	139,643
2013	152,075
2014	155,444
2015	164,836
2016	275,876
2017	287,016
2018	307,357
2019	307,263
2020	182,099*

*It should be noted that whilst the total figure for dogs travelling into Great Britain via PETS in 2020 is much lower than the previous years, this is largely due to an initial drop in numbers following the introduction of restrictions as part of the first lockdown of the Covid-19 pandemic. Whilst there was an initial drop in numbers, for example 1,554 dogs entered in

April, as many as 33,413 dogs entered via PETS in August. Even in November when a further lockdown was enforced, 12,477 dogs entered.

Following the changes to PETS in 2012, Dogs Trust has carried out five undercover investigations into the illegal importation of dogs into the UK. Furthermore, in December 2015, Dogs Trust established the Puppy Pilot to provide care and support for illegally imported puppies seized at the ports during their time in quarantine. By funding the care of these dogs and supporting their responsible rehoming, enforcement agencies at the ports have been freed up to focus on seizures knowing the fate of the puppies was secure with Dogs Trust. We have now cared for and rehomed around 1,500 puppies with an estimated market value of over £3.1 million.

In 2020, we also saw a 63% increase (from 203 in 2019 – 331 in 2020) in dogs coming through the Puppy Pilot. It's extremely concerning that even during the Covid-19 pandemic and the restriction of movements implemented to tackle the spread of the virus, we continued to see puppies being brought illegally into the country.

To read more about the findings of all five reports please visit <https://www.dogstrust.org.uk/puppy-smuggling/ps-media>.

1. Does the UK have sufficient resources and capacity to certify, record and inspect animal movements across its borders?

Dogs Trust believes the UK does not have sufficient resources and those available are not currently being allocated in the right way. We have set out our concerns regarding the certification, recording and inspection of firstly non-commercial movements of dogs and secondly the commercial movement of dogs below.

Non-commercial movements of dogs

As mentioned above, through our five investigations into the illegal importation of dogs into Great Britain, Dogs Trust has found the border controls and enforcement of PETS at UK ports to be completely ineffective. Our work on the Puppy Pilot has also demonstrated significant issues with enforcement as there is not sufficient out-of-hours and weekend cover at ports by Government agencies, to enable illegal imports to be apprehended. Puppy smugglers are therefore easily able to enter the country by travelling outside of usual business hours.

Responsibility of checks lies with carriers

Currently it's the responsibility of the carriers i.e. Eurotunnel and the ferry companies to undertake checks on pets that are travelling, and so challenges are placed on them to identify whether pet passports are fraudulent and whether puppies are over 15 weeks of age (the legal minimum age for travel). There is great variation in the knowledge of the carriers and our experience through our quarantine project is that intelligence sharing between the carriers and APHA is often left to individual relationships. Furthermore, the carriers are

potentially conflicted as they have a commercial interest to process passengers as quickly as possible.

We know from our investigations and through the Puppy Pilot Scheme that illegal transporters are very good at adapting their practices to avoid being detected. For example:

- The age of illegally imported pups has over time increased to make it harder for those enforcing the Pet Travel Scheme to detect underage puppies. There has been a noticeable movement towards the importation of puppies from less than 10 weeks old to around 12 to 14 weeks of age, just under the legal minimum of 15 weeks.
- Puppies are more often transported in ones and twos rather than groups of five which we used to see (due to the five-animal limit under the Pet Travel Scheme), again so as not to raise the suspicion of the authorities.
- Transporters often travel in the middle of the night and at weekends when there is less likely to be spot checks by APHA, as opposed to during normal working hours.

The focus on enforcement of the pet travel legislation must be shifted from the carriers to a qualified animal professional from a Government agency and this should include a requirement for there to be sufficient out-of-hours and weekend cover at ports. It costs an individual on average £15-£20 per dog when entering Great Britain. With 307,263 dogs entering Great Britain via the Pet Travel Scheme in 2019, even factoring in an administration fee, that is a significant amount of money that could be put towards funding a Government agency to undertake the checks.

No visual checks

Currently ‘documentary and identity checks’ are undertaken at the travellers’ point of entry. These are not fit for purpose as there is no obligation for the carriers to do a visual check of the animals being imported. The transporters of the dog scan the microchip themselves – not necessarily in sight of the carrier, who merely checks to see that the microchip number which appears on the scanner matches that on the passport. Unscrupulous dealers can simply attach a microchip on the puppy’s collar, scan it out of sight of the carrier, and then bin the chip as soon as they enter the country. The puppy can then be implanted with a UK microchip, with all traces of its origins hidden from the buyer.

In our second and third investigations, we successfully imported a toy dog on 5 out of 6 attempts without anyone noticing they were not real dogs. The only reason we did not succeed on the sixth attempt was because the microchip scanner malfunctioned. On the successful attempts, the toy dog had travelled either on an animal transport vehicle along with real dogs or on the back seat of a car. The microchip was taped to the inside of the carrier (a ploy often used by illegal puppy importers so that they can use microchips and passports numerous times) and staff did not check to visualise the dog.

With not even basic visual checks of the animals being carried out, the current checks are purely an administrative process. As a minimum, we strongly believe the checks at the border should include a visual check to ensure that the pet animal is the same as the animal listed on the pet passport, and is the age stated. Physical checks should also be a

requirement where necessary e.g. if a puppy is suspected of being underage or not matching the information in its pet passport and there should be a requirement for an animal health professional to be on hand to facilitate this.

Commercial movements of dogs

When looking at improving the enforcement of non-commercial legislation, there is a risk of traders shifting towards the commercial legislation. Although this is the correct legal route for importing puppies intended for sale, there are even less stringent checks carried out on commercial movements, and therefore this also needs addressing.

Through our work on the Puppy Pilot, we know illegal importers are extremely quick at adapting their tactics to avoid detection. One of the clear trends during the height of the Covid-19 restrictions was a switch from importing dogs under PETS to instead importing them under the commercial legislation, otherwise known as the Balai Directive (Council Directive 92/65/EEC), as commercial transporters were deemed as making essential journeys.

Intra Trade Animal Health Certificates (ITAHCs) are certificates used to document trade in animals between EU Member States and are issued for movements under the Balai Directive. Each certificate can cover a number of dogs in a consignment. When animals are transported via this legislation, they are not subject to checks at the border. Instead the Animal and Plant Health Agency (APHA) conduct post-import checks at the point of destination (up to 48 hours after arrival). APHA have previously confirmed that post-imports checks are carried out on less than 10% of consignments. However, during the first coronavirus lockdown, in person post-import checks were stopped entirely. The number of ITAHCs being issued per month continues to increase and is now at record levels, as shown below. Historically the busiest month was October to facilitate the Christmas market.

Intra Trade Animal Health Certificates (ITAHCs) figures	
February 2019	2,037
March 2019	2,393
April 2019	1,895
May 2019	2,244
June 2019	1,929
July 2019	2,081
August 2019	1,954
September 2019	2,623
October 2019	3,244
November 2019	2,287
December 2019	2,025
January 2020	2,580
February 2020	2,373
March 2020	1,321
April 2020	660
May 2020	3,220
June 2020	3,967

July 2020	4,850
August 2020	3,916
September 2020	5,206
October 2020	5,287
November 2020	4,944
December 2020	4,424

Following the UK's exit from the EU, there are new import requirements for animals entering the UK from the EU for commercial reasons. These include the requirement for:

- animals to be accompanied by an Export Health Certificate (EHC)
- import pre-notifications to be submitted by the importer via the Import of products, animals, food and feed system (IPAFFS) at least one working day before the expected time of arrival at the point of entry

Dogs Trust believes there is a significant opportunity for the new post EU Exit import requirements, and establishment of appropriate Border Control Posts, to significantly improve commercial checks on dogs. As previously mentioned, commercial checks currently take place at the point of destination, rather than at the point of entry and so the situation could be greatly improved if checks instead routinely took place at BCPs before consignments of dogs were able to enter the country. However, we are seriously concerned that the necessary planning and preparation has not yet taken place to enable this to be properly implemented. On 11th March it was reported² that the first checks on EU goods coming into the UK will not begin until October 2021 and will be phased in until March 2022. This follows warnings from the ports that the facilities needed to carry out checks will not be ready by July 2021 which is when the checks were originally expected to be introduced. We strongly urge the Government to allocate the necessary resources to ensure appropriate checks can be undertaken at BCPs as soon as possible. In the meantime, we question why and how commercial shipments are currently entering Great Britain via road, as the only legal route to the UK for commercial imports at present is via the already working BCPs at Gatwick, Heathrow, Manchester or Edinburgh airports.

2. How effectively will the UK be able to conduct animal disease surveillance and respond to outbreaks?

Dogs Trust has significant concerns regarding biosecurity associated with pet travel (both commercial and non-commercial). Now that the transition period for the UK exiting the EU has ended, the Government must strengthen the legislative protections.

As mentioned previously, Dogs Trust's investigations have found that harmonisation of the UK's quarantine and animal health controls with the rest of the EU in 2012 effectively relaxed those controls, leading to a significant increase in the number of dogs illegally entering the UK under the Pet Travel Scheme for commercial purposes, most notably puppies entering below the minimum legal age of 15 weeks. Through our undercover investigations, we have found evidence of owners/traders not vaccinating their dogs against rabies. Further, our

² <https://www.politicshome.com/news/article/government-delays-eu-import-checks-amid-warnings-of-food-shortages>

experience is when this happens, they are also unlikely to have been treated for tapeworm which is also a legal requirement for dogs entering the UK.

We also have concerns about the practice of importing adult dogs into the UK for rehoming, and the non-endemic diseases they may be carrying, such as Babesiosis, Ehrlichiosis and Leishmaniasis. The UK has a naïve dog population regarding these diseases. It is therefore important that the history of where a dog came from is passed on, particularly to vets. Leishmaniasis is a particular challenge in that it generally requires lifelong medication, i.e. it is managed rather than cured, and is potentially zoonotic. This infectious disease, which is not present in the UK, is transmitted by sandflies and, if left untreated, can be fatal. However, symptoms can take years to develop. In January 2019, the Vet Record³ reported the first case of canine Leishmaniasis in the UK without a history of travel to an endemic area, and most likely represents a case of dog-to-dog transmission. The paper could not rule out the possibility that Leishmaniasis had adapted to a different vector. According to the report, the patient had been in the owner's possession since a puppy, had no travel history outside of the UK and had never received a blood transfusion or been used for breeding. However, another dog in the household that had been imported from Spain had been euthanised six months previously due to severe Leishmaniasis.

No traceability of animals entering Great Britain

The increased number of animals coming into the UK, together with concerns about compliance with and enforcement of the legislation, presents a disease risk. Furthermore, Dogs Trust has strong concerns that there is no traceability of animals entering Great Britain and about the impact of this from a surveillance perspective.

Country of origin

One concern is that there has been a change in the way official data on the number of dogs travelling to Great Britain is collected. Previously, when dogs entered Great Britain via PETS, their country of origin was recorded. This allowed us to monitor trends such as the huge increase in the number of dogs travelling from Hungary and Lithuania. Defra's response to parliamentary question 257572, tabled on 22 May 2019, states:

“APHA stopped recording the country of origin of compliant animals imported under the scheme in 2016. Detailed data on non-compliant pet animals, including the country in which the paperwork accompanying the animal was issued, is always collected...”

Collecting the country of origin data for compliant pet imports has not proved useful in deterring puppy smuggling as it is essentially collecting information on legal movements...”

The mountain of evidence Dogs Trust has produced through its five undercover investigations, suggests that not all imports under the Pet Travel Scheme are legal movements. Further, official Government figures show that no dogs were imported

³ <https://veterinaryrecord.bmj.com/content/184/14/441>

commercially from Lithuania to Great Britain under the Balai Directive in 2016 and only two in 2015, yet during our third investigation we found Lithuanian puppies openly for sale on the internet in Great Britain. Given that Government figures also show that 2,271 dogs were imported into the UK from Lithuania via the Pet Travel Scheme in 2015, and 726 in 2016, we have reason to believe that the PETS figures are not only legal imports. Whilst the collection of data on the country of origin may not directly deter puppy smuggling, it is useful for monitoring trends and developments in the trade. We strongly recommend that the Government reverts to collecting this data as soon as possible.

Microchip details

Furthermore, as mentioned previously, for non-commercial movements, although pets are travelling with a passport, there is no requirement for their microchip to be registered to a database, nor a requirement for those carrying out the checks to record the pet's microchip number, their age or the date of entry. There is therefore no traceability of that animal entering GB in terms of where it entered and when. This information would be critical if there were an outbreak of disease to help identify the level of risk i.e. a dog that entered GB 6 months ago is going to be at much lower risk of carrying rabies than one which entered 6 weeks ago, based on the incubation period of the disease.

To further demonstrate the importance of knowing the source of a disease outbreak, take, for example, the 2001 outbreak of foot-and-mouth disease. More than 2,000 cases were recorded, it took nine months to bring foot-and-mouth under control, and yet the source of the virus remains unknown with it being impossible to trace exactly how it arrived in the UK. In 2007, a further outbreak showed the lessons learned from that in 2001. A case was confirmed in cattle on a Surrey farm, traced to a faulty drainage pipe at a nearby research facility where the virus was being used in the manufacture of animal vaccines. The scare provoked an immediate robust response and the outbreak was contained⁴.

When considering the lack of traceability of puppies entering Great Britain, it is also worth noting that Dogs Trust's fourth investigation found evidence of underage puppies from an unlisted Third Country (Serbia) being provided with EU passports, largely from Bulgaria and Romania, and brought into EU Member States for sale. Here they essentially become 'EU-bred dogs' and are free to be sold on throughout the EU, their original country of birth long forgotten.

For the purposes of the pet travel system in the EU, unlisted Third Countries are those, such as Serbia, that have not been accepted for listed status because of less robust veterinary or administrative systems, higher rabies incidence, or because they have never applied. While Serbia is negotiating for EU membership and enjoys close geographic proximity to several EU Member States, in animal transportation and pet travel terms it is considered an unlisted Third Country in EU legislation (due to inadequate methods to treat the prevalence of diseases which pose a danger to animal and human health).

One Serbian vet sold our investigators two Bulgarian passports and microchips without even seeing the puppies. A breeder also offered to sell our investigators 10-week-old puppies. If

⁴ <https://www.bbc.co.uk/news/magazine-35581830>

the rules for importing dogs from Serbia to an EU country are met, puppies should be at least seven months of age before they can legally travel. However, for an additional payment they could get Hungarian passports for the puppies which would be pre-filled with the vaccination and vet signatures – the breeder would simply fill in the details of the puppy such as its breed and date of birth.

For the above reasons we recommend introducing a requirement for microchips to be registered on a database which is also linked to a European database such as Europetnet and also for microchip details (number, date of entry) to be uploaded onto a central database on entry to the UK. The latter would be relatively easy by providing carriers / checkers with microchip scanners which can upload information directly to a central database. This would allow data to be captured in real-time, directly as animals enter the country, and so would prevent the issues we have seen with the accuracy of the data collection. This does not need to be onerous, as the database would not carry any personal information. The introduction of a centrally accessible database would also allow stakeholders, such as animal welfare organisations and Local Authorities, to undertake a risk assessment when animals with foreign microchips come into their care. Knowing when a dog entered the country is crucial to being able to assess their disease risk, particularly if there were a case of rabies identified.

In addition to disease surveillance, it is important that consideration is given to reduction in the risk of disease entering the UK.

Rabies

In response to parliamentary questions, Defra has stated they have conducted a renewed rabies risk assessment, however we have not seen the findings. We recommend, now the UK has exited the EU and the requirements for pet travel have changed, that Defra conducts a further assessment. This is particularly important given the significantly increased number of dogs entering Great Britain each year compared to when the initial risk assessment was conducted.

In the vein of reducing the risk of disease entering the UK we recommend the reintroduction of rabies blood testing before entry into the UK, along with a wait period after the rabies blood test before entry into the UK. This would help protect the UK from the risk of rabies. Such a wait period would increase the age at which puppies could enter the UK to around 6 months. This would also make it easier to differentiate between adult dogs and those that are too young to legally enter the country, as well as make the dogs less desirable for purchase.

Tick and Tapeworm treatment

Also in response to parliamentary questions, Defra has stated they have commissioned assessments to understand the risks posed by tapeworms, as well as ticks and tick-borne disease, and that the results of these will be used to inform future policy options. We do not know the status of these risk assessments and have not seen the findings, however we recommend renewed assessments are conducted given that the requirements for pet travel

have changed since the UK exited the EU, and the increased number of dogs entering Great Britain each year.

In 2012 the requirement for pets to be treated against ticks before entering the UK was removed. The importance of tick treatment is highlighted by the cluster of cases of canine babesiosis which were reported in Harlow and Romford in 2016, as well as in Hertfordshire in 2017. It is further highlighted by the importation of a *Hyalomma lusitanicum* tick into the UK in 2016, a type of tick which can carry and transfer Crimean-Congo haemorrhagic fever (CCHF) virus to humans.

To further reduce the risk of disease entering the UK we recommend that a requirement is reintroduced for dogs and cats to be treated against ticks before entering the UK, to prevent parasites such as *Babesia canis* and *Ehrlichia canis* being introduced into the UK. This could be based on the previous requirement for tick treatment prior to 2012, where pets had to be treated for ticks 24-48 hours before travel.

Lastly, when looking at reducing the risk of disease entering the UK, it should be considered that currently the window for tapeworm treatment before entry into the UK is 24-120 hours. It is worth noting that the larger the treatment window, the greater the chance of reinfection before entry due to there not being any residual effects of anthelmintics. Furthermore, currently it is possible to tapeworm treat a dog in the UK, go to mainland Europe and return to the UK within 120 hours without further tapeworm treatment being required before re-entering the UK.

We support the continued requirement for *Echinococcus multilocularis* (EM) tapeworm treatment before entry into the UK but recommend shortening the treatment window from 24-120 hours to 24-48 hours, as previously required. We also support the reintroduction of tapeworm treatment for cats.

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

Currently, the rules for pet travel between EU Member States and Northern Ireland will stay the same, as will travel from Northern Ireland to Great Britain. However, any person travelling with a pet from GB to NI, will be required to adhere to the EU requirements for travelling into the EU/NI from a Part II listed country. This means dogs will need to be microchipped and will need to have had a rabies vaccination (followed by a 21 day wait period before travelling), as well as tapeworm treatment. The pet will also need a single use EU animal health certificate confirming microchip and vaccinations (valid for 10 days from issue to entry of NI and for 4 months onward travel within the EU).

As Great Britain, Northern Ireland and the Republic of Ireland all have a similar health status, we believe pet travel between Great Britain and Northern Ireland should be as safe, simple and proportionate as possible. We share and empathise with concerns about the impact and disruption that the new requirements may have on well-meaning pet owners travelling between Great Britain and Northern Ireland.

We urge the UK Government to ask the European Commission to grant the UK part one listed status for UK pets under the EU Pet Travel Scheme. Pet owners would still need a pet passport for travel to Northern Ireland, but this would involve less disruption for owners than the current requirement to get a new Animal Health Certificate for every trip.

We suggest that the requirement for tapeworm treatment for pets travelling between Great Britain and Northern Ireland could also be removed, given that *Echinococcus multilocularis* is not present in any of the four nations. However, this should only be done if appropriate checks are carried out for pets travelling from the EU to the Republic of Ireland. These checks should be in line with our recommendations to the UK Government for pet travel into the UK.

Robust checks for entry to the Republic of Ireland would be important given that there are no border checks between the Republic of Ireland and Northern Ireland. It is therefore impossible to prove whether a dog originated from the Republic or Northern Ireland. We are aware from Operation Delphin, a multi-agency taskforce led by the SSPCA to tackle the illegal puppy trade, that this makes Belfast to Cairnryan (and similar passages) lucrative routes for individuals involved in illegal importation. In addition, ferries operate between the Republic of Ireland and the UK, including the port of Holyhead. We have concerns that the island of Ireland could be used as a transit country for companion animals from mainland Europe, particularly underage puppies, destined for sale in Great Britain, which would potentially open up another source for the introduction of disease. Considering significant profits that can be made there would be increased incentive for unscrupulous importers to take this route if it becomes more difficult to import pet animals through Great Britain's ports.

The Republic of Ireland and Northern Ireland should also be viewed as a distinct epidemiological unit especially with regards to disease surveillance and outbreak preparedness. Extra consideration must be given to how, from a disease prevention and control point of view, the Island of Ireland can have an all-island approach and coordinated policy to prevent disease spread.

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

As a dog welfare charity, we strongly believe that animal health and welfare must be the primary consideration. It should also be noted that the recommendations put forward in our response generally balance animal health and welfare alongside economic interests. For example, we recommend that the focus on enforcement of the pet travel legislation must be shifted from the carriers to a qualified animal professional from a Government agency and this should include a requirement for there to be sufficient out-of-hours and weekend cover at ports. It costs an individual on average £15-£20 per dog when entering Great Britain. With 307,263 dogs entering Great Britain via the Pet Travel Scheme in 2019, even factoring in an administration fee, that is a significant amount of money that could be put towards funding a Government agency to undertake the checks.

When it comes to the illegal puppy trade and the consideration of economic interests, it is also worth noting the work of the HMRC taskforce which was set up in October 2015 after animal welfare groups expressed concerns that puppies were being reared on a mass scale

and sold illicitly in the UK. As of May 2019, the Taskforce had recovered £5,393,035 in lost taxes from 257 separate cases since its formation⁵. By allocating sufficient resources to ensure proper enforcement and checks on commercial and non-commercial movements of pets into the UK we would expect this to reduce the amount of revenue lost by the Government through abuse of the Pet Travel Scheme.

The economic impact on the unsuspecting buyers of illegally imported puppies should also be considered. Through its Puppy Pilot Dogs Trust has now cared for and rehomed around 1,500 puppies with an estimated market value of over £3.1 million. Many of these puppies have required veterinary care, the costs of which Dogs Trust has underwritten. Given the lack of comprehensive enforcement at the ports, this is likely to just be the tip of the iceberg. It costs Dogs Trust around £1,000 per puppy from seizure to rehoming. This includes kennelling, medical treatments, vaccinations, staff hours to socialise and habituate them. It should be considered that the veterinary costs for puppies which move across the border undetected would land with their new owners.

Domestic animals:

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

Whilst the rules for pets travelling from the UK to the EU have changed in line with the UK being granted Part 2 listed status by the EU, the rules for pets travelling from the EU to the UK remain the same. For genuine pet owners travelling with their pets, the key change for travelling from GB to the EU is that the pet passport is no longer valid and has been replaced by a requirement to have an animal health certificate. This is valid after the date of issue for:

- 10 days for entry into the EU or Northern Ireland
- 4 months for onward travel within the EU
- 4 months for re-entry to Great Britain

We share and empathise with concerns that the new requirements place a greater burden on well-meaning owners looking to travel with their pets. We urge the UK Government to continue to push the European Commission to grant the UK part one listed status for UK pets under the EU Pet Travel Scheme. Whilst it is possible owners would need to apply for a new pet passport, this would cause less disruption than the current requirement to get a new Animal Health Certificate for every trip.

The requirements for pet owners travelling from the EU to Great Britain on the other hand, have not changed. In light of this and given the concerns we have outlined in our response thus far about the insufficient checks on dogs travelling under the non-commercial legislation, the system will continue to be open to abuse by unscrupulous traders. It is therefore imperative the Government reviews the rules for pets entering Great Britain with a view to cracking down on the illegal importation of dogs. Until this is done, underage puppies will continue to be illegally imported into the UK with false documentation.

⁵ <https://www.bbc.co.uk/news/uk-48167134>

Furthermore, as outlined in our response to question 3, if appropriate checks are not put in place, we have concerns that the island of Ireland could be used as a transit country for companion animals from mainland Europe, particularly underage puppies, destined for sale in Great Britain. Considering significant profits that can be made there would be increased incentive for unscrupulous importers to take this route if it becomes more difficult to import pet animals through Great Britain's ports.

We urge the Government to take forward the recommendations we have outlined throughout our response to put an end to the illegal importation of dogs.

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

The current rules and checks on the movement of domestic animals are in no way strong enough to prevent illegal activity, as outlined in our response so far. Through our first four investigations and the establishment of our Puppy Pilot scheme Dogs Trust found evidence of:

- Breeders and dealers in Central and Eastern Europe using PETS for the illegal importation of underage puppies into Great Britain for sale;
- Unscrupulous vets falsifying data on pet passports;
- Vets in Serbia (an unlisted Third Country where there is higher rabies incidence) providing pre-filled Hungarian and Bulgarian passports and microchips for underage puppies, passing them off as EU-bred animals;
- Vets in Lithuania offering to sedate puppies to smuggle them across the border;
- Heavily pregnant females being illegally brought into the UK to allow dealers to dupe buyers into buying 'UK bred' puppies;
- Ineffective border controls and enforcement of PETS at UK ports with Dogs Trust being able to successfully import a toy dog in 5 out of 6 attempts without anyone noticing they were not real dogs;
- Lack of sufficient penalties to deter the illegal trade;
- Puppies as young as 4 weeks entering the UK, well below the legal minimum age of 15 weeks.
- Puppies being transported from Lithuania, across Europe and into Great Britain – a journey of over 1000 miles/29 hours with no food, exercise or toilet breaks and minimal water.

Dogs Trust's fifth investigation focussed on the GB side of the trade, highlighting just how prolific adverts for imported puppies are on four of the largest UK classified advertising websites. Our researcher looked at adverts for breeds amongst those most intercepted on entry to the UK from Central & Eastern Europe and cared for on the Puppy Pilot in the last two years. We found that 29% of adverts reviewed in England were for imported puppies. 14% of all ads reviewed across the UK were for imported puppies and 18% of these were confirmed by their seller as being under the legal minimum 15 weeks of age for entry into the UK.

This illegal trade has a huge impact on the British public, financially, emotionally, and from a public health perspective, as well as on the potential health and welfare of the animals involved. Therefore, we urge the Government to take the following actions urgently:

- The focus on enforcement of the pet travel legislation must be shifted from carriers (i.e. the ferry companies and Eurotunnel) to Government agencies and visual checks of all dogs entering the country need to be undertaken;
- Increase maximum penalties for those caught illegally importing dogs and introduce punitive Fixed Penalty Notices;
- Introduce a centrally accessible database, linked to EU database Europetnet, to log pets' microchip numbers when they enter Great Britain;
- Introduce a requirement for microchip details, including the date that the pet entered Great Britain, its age and country of origin, to be uploaded onto a central database on entry to the UK.

As pet travel was previously governed by EU legislation and the transition period for the UK exiting the EU has ended, it is now also in the gift of Government to make the following further changes:

- Reintroduction of the requirement for a rabies blood (titre) test before entry into the UK;
- Introduce the requirement for a wait period, following the rabies blood (titre) test and before entry into the UK, that is in line with the incubation period of rabies. This would also mean that the age at which puppies could legally enter the UK would be increased to six months, which would help make them less desirable for purchase;
- The window for tapeworm treatment of dogs before entry into Great Britain to be shortened from 24-120 hours to 24-48 hours and tapeworm treatment for cats should be reintroduced. The current period within which treatment must be administered before travel is too long so increasing the risk of reinfection after treatment and before travelling is higher. Furthermore, it is currently feasible within a 120 hour window to treat against tapeworm in GB, travel to France where the tapeworm *Echinococcus multilocularis* (EM) is present, and return without further treatment. Whilst it is not illegal to do this, it is an abuse of the Pet Travel Scheme and risks introduction of EM into Great Britain;
- Reintroduction of the requirement for dogs and cats to be treated against ticks;
- Reduce the number of dogs allowed to travel. Currently it's possible to travel with 5 dogs per person, however a 2010 study⁶ estimated that the majority of UK households owning dogs had only one dog (73.3%), 18.9% owned two dogs and 4% owned three dogs. Therefore, by setting the limit at three dogs up to 96.2% of families would be able to travel with their pet dogs.

It is worth noting that, even if the UK's application to the EU to become Part 1 listed status is granted, it is still possible for the UK Government to introduce tighter restrictions. This is demonstrated by Iceland, which is listed as a Part 1 country under the EU legislation. An

⁶ Murray, W. J., Browne, M. A., Roberts, A., Whitmarsh, T. J. and Gruffydd-Jones, J. K. (2010). Number and ownership profiles of cats and dogs in the UK. *Veterinary Record* 166, 163-168

import permit is required for entry into Iceland, as well as for the travelling dog to meet certain health requirements and be quarantined for 2 weeks upon arrival.

We know through our work investigating the illegal importation of puppies that the players involved in the trade are very quick to adapt and evolve their tactics to evade the law. We have already seen an increase in the number of dogs being concealed within vehicles, as opposed to being imported with false documentation. By tightening the legislation, there is the risk that this trend could increase further. This further demonstrates why we need tougher penalties that will deter the criminals involved in these crimes. We also, however, need greater measures to detect puppies which are smuggled in the physical sense. These solutions could include thermal technology and sniffer dogs.

As mentioned previously, when looking at improving the enforcement of non-commercial legislation, there is a risk of traders shifting towards the commercial legislation. Although this is the correct legal route for importing puppies intended for sale, there are even less stringent checks carried out on commercial movements, and therefore this also needs addressing.

Currently, when animals are transported via the commercial legislation, they are not subject to checks at the border. Instead the Animal and Plant Health Agency (APHA) conduct post-import checks at the point of destination (up to 48 hours after arrival). APHA have previously confirmed that post-imports checks are carried out on less than 10% of consignments. However, during the first coronavirus lockdown, in person post-import checks were stopped entirely and our understanding is that these have not restarted.

Following the UK's exit from the EU there are new requirements for the commercial movement of dogs and Border Control Posts (BCPs) are to be introduced. Dogs Trust believes there is a crucial opportunity to significantly improve checks on commercial movements of dogs by introducing these at the point of entry at the BCPs. However, we are seriously concerned that the necessary planning and preparation has not yet taken place to enable this to be properly implemented. The checks at BCPs were expected to be phased in from April 2021 and be fully introduced by 1st July 2021. However, on 11th March it was reported⁷ that the first checks on EU goods coming into the UK will now begin in October 2021, six months after they were originally planned to be introduced and will be phased in until March 2022. This follows warnings from the ports that the facilities needed to carry out checks will not be ready by July 2021.

We strongly urge the Government to allocate the necessary resources to ensure appropriate checks can be undertaken at BCPs as soon as possible. In the meantime, we question why and how commercial shipments are currently entering Great Britain via road, as the only legal route to the UK for commercial imports at present is via the already working BCPs at Gatwick, Heathrow, Manchester or Edinburgh airports.

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⁷ <https://www.politicshome.com/news/article/government-delays-eu-import-checks-amid-warnings-of-food-shortages>

