

would recommend that anyone breeding from a dog or cat is required to register with their local authority and demonstrate appropriate animal identification eg. microchipping. Such an approach would reduce the risk of any unintended consequences and ensure that significant numbers of puppy and kitten sales are not driven underground or sourced through illegal imports.

7. The illegal puppy trade should be viewed in the context of the wider European landscape. The UK is not alone in the issues it faces and there is evidence that similar problems exist not just across the countries of the UK but also across Europe. Reports by NGOs and the European Commission have shown the illegal trade is widespread and increasing.^{1 2}The Scottish Government also noted in their report into the trade into the UK that illegal trade was widespread.³

8.

How many puppies are imported into the UK illegally, including under the EU Pet Travel Scheme?

9. [Figures released from Defra earlier this year](#) demonstrate that the number of dogs imported to Great Britain through the Pet Travel Scheme (PETS) remained broadly the same in between 2018 and 2019, with 307,263 being imported in 2019 compared with 307,357 dogs in 2018. However this is a significant increase from 152,075 in 2013 and from 85,786 dogs pre-PETS in 2011. We note that 2018 was the fifth year in a row that import numbers have increased since changes to harmonise the Pet Travel Scheme (PETS) with the rest of the EU in 2012,–152,075 in 2013, 164,836 in 2015, 275,876 in 2016, 287,016 in 2017 and 307,357 in 2018)^{4,5}.
10. In addition, government figures suggest that the commercial imports of pets in 2020 has increased. In response to a [parliamentary question](#)⁶, the government reported that the number of licenses issued for the commercial import of pets (Intra-Trade Animal Health Certificates (ITAHCs)) issued for dogs entering the UK between June . August 2020 was 12,733⁷. According to the RSPCA, this is more than double that for the same period in 2019, where 5,964 ITAHCs were issued.⁸

11. We do not have complete figures of the number puppies imported into the UK illegally. In a 2020 answer to a Parliamentary Question⁹, Defra [provided figures for the number of dogs landed in Great Britain which did not meet the import requirements and therefore required quarantine in 2019](#).¹⁰ However

¹ Discussion papers on the health and welfare of dogs in trade:

https://ec.europa.eu/food/sites/food/files/animals/docs/aw_platform_res-lib_disc-paper-dogs.pdf

² European Commission, 2015. Study in EU trade in cats and dogs. Available at:

https://ec.europa.eu/food/sites/food/files/animals/docs/aw_eu-strategy_study_dogs-cats-commercial-practices_en.pdf

³ Scottish Government, 2017. Sourcing of pet dogs from illegal importation and puppy farms 2016-2017: scoping research

⁴ Dogs Trust, 2017. Puppy Smuggling . A Tragedy Ignored [pdf] Available at: <https://www.dogstrust.org.uk/puppy-smuggling/ps-media>

⁵ Dogs: Imports:Written question . 254873 <https://www.parliament.uk/business/publications/written-questions-answers-statements/written-question/Commons/2019-05-15/254873>

⁶ <https://questions-statements.parliament.uk/written-questions?SearchTerm=+Intra-Trade+Animal+Health+Certificates+&DateFrom=19%2F12%2F2019&DateTo=31%2F03%2F2021&AnsweredFrom=&AnsweredTo=&House=Bicameral&Answered=Any&Expanded=False>

⁷ The number of Intra-Trade Animal Health Certificates (ITAHCs) issued for dogs entering the UK in June 2020 was 3,967, in July 2020 was 4,850 and in August 2020 was 3,916.

⁸ <https://www.rspca.org.uk/-/news-puppy-imports-more-than-double-during-summer>

⁹ <https://questions-statements.parliament.uk/written-questions/detail/2020-02-21/19046>



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 UK airports and during the pets check are found to be non-compliant after a trading standards investigation are found to be non-compliant

12. [Dogs Trust investigations into this issue](#) have repeatedly demonstrated the use of the Pet Travel Schemes (PETS) to illegally import puppies into the UK. It is important to note that any numbers are likely to be underestimates as there will always be animals that are not picked up as illegal or non-compliant.
13. [Voice of the Veterinary Profession survey](#) showed that three in ten (29%) companion animal vets surveyed in 2018 had seen puppies that they were concerned had been brought into the country illegally. It is important to note that the most commonly mentioned breed was the French Bulldog, with more than half (54%) of all vets who had suspected a case of illegal importation citing it alongside Pugs (24%) and designer crossbreeds such as Cockapoos (18%) as the three breeds they had most concerns about. Dachshunds, Chihuahuas, Shih Tzus and Poodle crosses were other breeds mentioned by vets.
14. These statistics mirrored findings from [Dogs Trust's](#) most recent [puppy smuggling investigation](#), which reported that 63% of puppies intercepted at the British border as part of the Puppy Pilot scheme between December 2015 and July 2018 were French Bulldogs, Pugs, English Bulldogs and Dachshunds. These figures demonstrate that key driver in illegal importations appears to be the demand for these breeds.
15. Further, if vets suspected that a puppy was illegally imported, almost three-quarters (72%) of vets said their suspicions were raised by the puppy's appearance, 44% were told the puppy had been brought from abroad, but they found it to be too young to have a foreign microchip ear to match the information on the pet passport, while in a similar number of cases the vet found a foreign microchip in a puppy who was too young to have been imported. Other reasons included poorly completed pet passports, suspicious vaccination records and poor health.¹¹
16. [Official Vets](#) (Official Vets who undertake government work relating to PETS in veterinary clinics), which were used to inform Defra and APHA when formulating PETS related policies in preparation of Brexit.¹² Results indicated that 51% were concerned about the current rabies vaccination regime; 68% were concerned about the tick treatment regime for pets entering the UK from abroad; and over 50% expressed concerns about pet passports including forgery (non-UK), poor border checks, puppies appearing younger than the age on the passport and in particular, concerns around imports from Eastern European countries. Respondents also commented on the difficulty in reporting non-compliances through local government bodies.

Impact of Covid-19 on illegal imports

17. We are extremely concerned by the steep increase in demand for puppies and kittens during the Covid-19 pandemic.
18. Anecdotally, BVA members have reported a large rise in new puppy registrations in practice during the lockdown period as the public have been spending more time at home. Throughout the pandemic, the veterinary profession has reiterated that now is not the time to import puppies from abroad.

¹¹ <https://www.bva.co.uk/news>

for a competition, show or sporting event where, in line with current legislation, written evidence of event registration must be provided).

27. Enforcement provisions should also be improved and we would question whether the carriers are the right people to undertake routine checks. Authorised officers may benefit from veterinary-delivered training or guidance, including guidance on dentition checks if the age limit is raised to 15 weeks.
28. The verification procedure itself should also be revised to ensure that an enforcement officer must see the animal when scanning for a microchip and ensure that that any microchips placed external to a puppy in its carrier are not scanned. In addition, it should be ensured that puppies entering the UK are checked at the point of entry to confirm that they match the information in their pet passport and are not underage.
29. We also note that there is a lack of clarity as to whether the non-commercial movement of pets requires the owner/person with permission to transport the animal to complete and present [a declaration for the non-commercial movement of animals](#) with their pet passport at check points, and whether this is currently being enforced.
30. Enforcement of commercial pet movements to prevent abuse
Since 2012, the total number of dogs commercially imported into the UK has risen from 6,085 to 34,017¹⁵, with some illegal importers transporting pets under the Balai Directive and commercial routes due to increased scrutiny of illegal imports through the Pet Travel Scheme¹⁶. Further, under the Balai Directive, compliance checks are only required at the points of origin and destination as opposed to at the ports, and less than 10% of consignments are in fact checked at the place of destination.¹⁷
31. We are concerned that the Balai Directive is open to abuse by illegal importers and there are missed opportunities in the identification of non-compliance with commercial pet travel regulations. Regulation surrounding compliance inspections of commercial pet the UK 92(n)27(g)-et 2(c)-28(r)-19(o)27(c)] TJETQq0.000008869

34. Under current controls, as it is possible to move five puppies per person non-commercially, it is possible for two or three people to bring in 10-15 puppies in this manner in one consignment and, in turn abuse legislation to bring in numerous puppies for commercial purposes.¹⁸

Extending the waiting time post-rabies vaccination to 12 weeks

35. We support extending the waiting time post-rabies vaccination under current pet travel legislation to 12 weeks (at present the wait time stands at 21 days). Extending the wait time within current pet travel legislation would cover the potential extended incubation period for rabies (see below) and has the potential to reduce the misuse of non-



38. It is important to note that under the current advice with regard to a no deal Brexit - the requirements for travel from UK to EU, will be more stringent than travelling from the EU to the UK. It is expected that the EU will treat the UK as an [unlisted third country](#) and require blood testing to confirm rabies titre and a 3 month wait to confirm the rabies vaccination has been successful, while animals returning to the UK from [the EU will be able to do so with their pet passport as under current Pet Travel Scheme rules](#).

Additional recommendations to strengthen controls

39. In the [BVA policy position on pet travel](#) we also set out the following recommendations to protect the UK from the risk of zoonotic disease. For the rationale behind these recommendations please consult the policy position at **Annex A**:

The UK Government should reintroduce compulsory tick treatments for all dogs and cats travelling under the Pet Travel Scheme. Consideration should also be given to reintroducing compulsory tick treatments for ferrets as per previous requirements under the Pet Travel Scheme.²⁹

The UK Government should introduce tapeworm treatment for cats as well as dogs under the Pet Travel Scheme. Consideration should also be given to reintroducing tapeworm treatments for ferrets as per previous requirements under the Pet Travel Scheme.³⁰

For *Echinococcus multilocularis* (EM)-free status, the tapeworm treatment window of 24-120 should be shortened to 24-48 hours before entry into the UK from infected countries.

For rabies-free status, the UK Government should restrict the movement of dogs from countries with high rabies risk in terrestrial animals and reintroduce the rabies *titre* test as a mandatory requirement before travel.

To reduce the risk of importation of disease endemic in other countries, the UK Government should restrict the movement of stray dogs from countries which are endemic for diseases not currently considered endemic in the UK eg. *brucellosis*, *babesia*, *ehrlichia*, *dirofilarial*, *leishmania* and introduce testing for any such diseases as a mandatory requirement for stray dogs before travel to the UK.

Consideration should be given to maintaining a comprehensive record of all port checks and diagnostic results to feed in to UK surveillance data on the diseases covered by PETS and those not considered as endemic for the UK eg. *brucellosis*, *babesia*, *ehrlichia*, *dirofilarial*, *leishmania*.

The UK Government should work to better enforce Pet Travel Scheme Rules to prevent the movement of dogs for the sole purpose of a change of ownership through non-commercial routes.

Prospective owners should be encouraged to rehome from the existing UK dog population and UK rehoming charities or welfare organisations.

Impact of Brexit transition period on Pet Travel Requirements

40. We are aware that the UK has submitted an application to become a Part 1 listed third country under Annex II of the EU Pet Travel Regulations to the European Commission in a preferred position. However, as the end of the transition period fast approaches, there is still a lack of clarity as to anticipated changes and whether the UK will be granted Part 1, Part 2 or unlisted status.

41. In July 2020, we called on the [government to set out](#) (2020) (15) (16) (i) (02) (o) (27) (w) (16) (n) (27) (6) (Q) (0.069 0 595.2 84

blood test at least 30 days following the vaccination. Owners will then need to wait a further three months from the date the successful blood sample was taken before they can travel with their pet. They will also need an animal health certificate setting out the details of the test and results issued by an Official Veterinarian prior to travel.

42. We are advising owners to consult their vet at least four months ahead of trips to ensure that their cat,



Managing internet sales and advertising
51.



Animal welfare charities and a wider economic downturn

- 58. The Covid-19 crisis is one of the biggest shocks to the economy in modern history. The labour market impacts so far are well understood, being very sectorally differentiated, with the young, the low paid and the self-employed most likely to be affected. The longer-term economic impact is more uncertain.
- 59. According to the Resolution Foundation³¹:

ce May, and output is expected to increase over the course of 2020. Unlike in other recent income hits, inflation is also expected to remain low, falling to 0.3 per cent by Q4 2020. But despite that overall recovery, the phasing out of the JRS and continued impacts from coronavirus mean that rising unemployment is now a critical concern. The OBR forecasts unemployment hitting 11.9 per cent in BT/F3 10.2 Tf1 0 0 1 68.475 590.inco



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Pre-entry waiting period	Yes
Length of waiting period	12 weeks after vaccination against rabies
Tick treatment	Yes
Tapeworm treatment	Yes (dogs and cats, 24-48 hours before embarkation to UK unless arriving directly from <i>echinococcus multilocularis</i> free Member States . currently Malta, Ireland and Finland)

	vaccination (by EU approved lab).
Pre-entry waiting period	Yes
Length of waiting period	12 weeks from date of blood sample
Tick treatment	Yes
Tapeworm treatment	Yes (dogs and cats, 24-48 hours before embarkation to UK)





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covered by PETS and those not considered as endemic for the UK eg. brucellosis, babesia, ehrlichia, dirofilarial, leishmania.

Recommendation 10: The UK Government should work to better enforce Pet Travel Scheme Rules to prevent the movement of dogs for the sole purpose of a change of ownership through non-commercial routes.

Recommendation 11: Prospective owners should be encouraged to rehome from the existing UK dog population and UK rehoming charities or welfare organisations.

Strengthening enforcement provisions

Enforcement of the Pet Travel Scheme is crucial to effectively regulate pet movements and to achieve this councils require adequate funding to allow for consistent and effective inspections at ports, including out-of-hours and weekend cover.

Given that the number of movements of dogs per year has significantly increased year on year since the introduction of the Pet Travel Scheme in 2011 (an increase of 85,786 dogs in 2011 to 152,075 in 2013, 164,836 in 2015 and 275,876 in 2016)

Recommendation 14: The verification procedure used at ports to check dogs entering the UK should be revised to ensure that an enforcement officer must see the animal when scanning the microchip and ensure microchips external to a dog are not scanned. For pets returning after shows, competitions or sporting events, their exit should be verified and import records reconciled, in the case of dogs by scanning their microchip and for all other pets, relevant paperwork is checked.

Strengthening compliance checks for the commercial movement of pets (Balai Directive)

The Balai Directive ([EU Directive 92/65/EEC](#)) sets out the requirements for the commercial import and export of animals being moved in or out of EU Member States. In addition to the requirements set out under the Pet Travel Scheme, the Directive requires that:

Animals must be exported from premises which are either registered or approved by the country of origin

An authorised veterinarian must carry out a fitness to travel examination on each animal up to 48 hours before travel

Each movement of animals must also have a health certificate signed by an authorised veterinarian.

Since 2012, the total number of dogs commercially imported into the UK has risen from 6,085 to 34,017⁶⁰, with some illegal importers transporting pets under the Balai Directive and commercial routes

some other significant threat to public health or safety or to the health or safety of an individual; or where the information is likely to help in the prevention, detection or prosecution of a crime.

If a client refuses to consent, or seeking consent would be likely to undermine the purpose of the disclosure, the veterinary surgeon or veterinary nurse will have to decide whether the disclosure can be justified. Generally the decision should be ba