

Unscrupulous breeding and importation

1. What risks to biosecurity and public health are posed by abhorrent practices such as
 - a. unscrupulous breeding, including “puppy mills” – which are characterised by poor conditions and rapid breeding – both here and those overseas from which dogs are then imported, often in large numbers in a single vehicle,
 - b. the importation of dogs, including heavily pregnant bitches, and cats, and “rescue dogs” (some of whom are misrepresented as such);

as well as similar practices for other species of companion animals? Is the occurrence of such activities changing?

9. The importation of dogs raises a number of concerns regarding health and welfare. We are particularly concerned about:
 - the increased risk of exotic and zoonotic diseases (those that can be passed between animals and humans) being brought into the UK via pets imported into the UK;
 - the rehoming of stray dogs from abroad with unknown health histories and behavioural issues, the later are known to be a leading cause of rehoming failure of rescue dogs¹;
 - the ongoing misuse of the pet travel regulations to illegally import puppies; and
 - abuse of legislation for the commercial movements of pets by illegal importers.
10. A BVA member survey² conducted in 2021, found that 38% of respondents working in companion animal or mixed practice had seen puppies they were concerned had been imported illegally. This figure compared to 29% when we asked the same question in spring 2018. The two main reasons illegal imports were suspected were the client’s explanation of how/where the puppy was acquired (73%) followed by the puppy being too young to have been imported but the vet having been told that it has come from abroad (50%)³. A survey of pet owners carried out by the vet charity PDSA showed that the proportion of dogs, cats and rabbits imported from abroad had increased in 2022 to 6% compared to 4% in 2021⁴.
11. We have been calling for pet travel legislation to be strengthened in order to reduce biosecurity risks and protect the health and welfare of the UK’s animals and wider public. Our key asks are:
 - reintroduction of compulsory tick treatments for all non-commercial movements of cats and dogs
 - introduction of tapeworm treatment for cats as well as dogs and shorten the tapeworm treatment window from 24-120 to 24-48 hours before entry into the UK from infected countries.
 - extension of the waiting time post-rabies vaccination to 12 weeks
 - restriction on the movement of stray dogs from other countries with high rates of diseases that aren’t commonly found in the UK, and mandatory testing in stray dogs before travel
 - stronger enforcement provisions and compliance checks for the commercial movement of pets

¹ <https://vethelpdirect.com/vetblog/2022/11/05/how-to-reduce-the-risks-if-importing-rescue-dogs-from-abroad/>

² We are happy to share the underlying data for all BVA surveys mentioned in this submission on a confidential basis if this would be helpful for the enquiry.

⁴ PDSA Animal Wellbeing Report 2022: <https://www.pdsa.org.uk/media/12965/pdsa-paw-report-2022.pdf>

collection and analysis, progesterone testing, artificial insemination, and ultrasound scanning. Many of the clinics focus on the most popular dog types, such as bulldogs and other flat-faced breeds, which struggle to whelp naturally¹¹ and are known to have a range of breed-related health and welfare problems.¹² BVA has worked extensively on raising concerns around such breeds and improving their welfare. We launched the 'BreedtoBreathe' campaign¹³ to raise wider awareness of the issues affecting the health and welfare of affected breeds.

19. In our view, artificial insemination can play a role in dog breeding and if used correctly can result in improved dog welfare. For example, the procedure can be used to widen the genetic pool of some breeds by introducing semen from stud dogs

relinquished a pet in 2022 with dogs being the most likely species to be relinquished²¹.

increased the financial pressures on pet owners and we would expect to see this impact on the veterinary profession.

45. Abusive behaviour by clients has also been shown to have an impact on vets' mental health and plays an important part in vets leaving the profession. In 2021, we asked UK-based vets currently working whether they believe they will still be working in the profession in five years' time. In response, 29% of vets who had experienced online abuse stated that they intend to pursue another career vs. 9% of vets who had not experienced abuse.
46. Veterinary practices are therefore struggling with the combined pressure of:
 - capacity shortages which has been resulting in stress, burnout, and disillusionment
 - poor work-life balance
 - mental health issues.
47. In addition, the cost-of-living crisis has had a direct impact on veterinary care providers. Like other businesses veterinary practices have experienced sharp rises in their energy costs over recent months, combined with increased costs for equipment and medicines. The increased expenditure will place further pressures on the profession, and there is an increased risk that these combined cost pressures will result in some veterinary practices having to close, while others will be forced or have already been forced to increase the cost of veterinary services, leaving more pet owners unable to afford essential care, with serious implications for animal welfare.

Current Preventative measures

6. Is the current regulatory and legal framework to both support the welfare and prevent the abuse of companion animals fit for purpose? Do the available penalties – and the probability of prosecution – act as a sufficient deterrent?

48. As mentioned above, we are not directly involved in bringing legal action against breaches of animal welfare legislation. We are however aware that it has proven challenging to bring cases related to canine fertility clinics under the Animal Welfare Act 2006 and the equivalent legislation in the devolved nations. It is our understanding that providing proof of unnecessary suffering can be a particular challenge.
49. Like any regulatory regime,

51. The Kept Animals Bill is important legislation that BVA is keen to see enacted in this parliament, before EU regulations are phased out. It covers several key areas covered by this inquiry, including animal import and export and keeping primates as pets.
52. However, we have concerns about some of the provisions in the Bill and whether they will adequately address specific animal welfare concerns. One of which is the keeping of primates as pets. BVA has significant concerns as to whether the welfare needs of primates can be met when they are kept privately as pets. They are long-lived, intelligent, animals with complex social and dietary needs, and are unsuitable as companion animals. While the Bill aims to ban the keeping of primates as pets without a licence, as it stands, it leaves a number of loopholes which may result in the licensing regime and transitional registration being ineffective at reducing primate populations and improving their welfare. ETQ4 (l)5(i)5(
53. The effectiveness of the Bill will depend on sufficient resourcing being made available to enable the enforcement of the measures set out within it. The enforcement regime also needs to focus on adequate training for enforcement officers to enable them to correctly identify and assess potential breaches of animal welfare legislation.

8. What additional measures should the Government s

