



BRIEFING PAPER

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Puppy Smuggling

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1. Summary

There are ongoing animal health and welfare concerns about puppy smuggling into the UK using the EU Pets Travel Scheme as a cover for importing puppies of desirable breeds, often underage and bred in poor conditions.

Pet animals can be brought into the UK from Member States through two different schemes, one is for travel of owners with pets and the other for the commercial imports of pet animals. Under the [EU Pets Travel Scheme or PETS](#), vaccinated and microchipped dogs, cats and ferrets are allowed to travel between EU countries for non-commercial reasons as long as they have a pet passport and have complied with all the requirements of the scheme, which include a rabies vaccination.

The PETS scheme is designed to allow a maximum of five pets to travel with their owner, rather than for the commercial movement of animals intended for sale as pets. Under the scheme, pet owners must fill in a declaration confirming that they are not going to sell or transfer the ownership of the pet. An approved transport company must be used for the

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travel of pets unless travelling between the UK and Ireland, where a private boat or plane can be used.¹

The [Balai Directive](#) sets out the requirements for the commercial import and export of animals being moved in or out of EU Member States. It includes more stringent requirements for pet exports, including that they be exported from premises which are registered or approved by the country of origin and a fitness to travel examination by a vet for each animal up to 48 hours before travel.

Campaigners such as the [Dogs Trust](#), RSPCA and SPCA are concerned about evidence that the PETS travel scheme is being abused to commercially import very young puppies illegally for the UK pet trade. They have raised concerns about the welfare and health of the animals being imported. In addition, there is evidence from border checks and seizures that puppies are being hidden and smuggled into the UK. In response, there have been calls from these charities to address the issue and strengthen the requirements for travelling with pets once the UK leaves the EU.

The Government has set out measures it has taken to address concerns, including contacting Member States with their concerns and proposed a ban on commercial third-party sales of puppies in July 2018. The [Government announced](#) in December 2018 that it would be introducing a ban as proposed.

2. Background

2.1 Number of dogs and puppies in the UK

There is no reliable data on the demand for puppies in the UK. There are no official estimates of the number of dogs in the UK. Available estimates have a rather wide range. The Pet Food Manufacturers Association (PFMA) has produced a recent estimate that there were around 9.0 million dogs in the UK in 2018.² However, [Murray et al 2015](#) estimated that there were between 10.7 and 12.5 million dogs in the UK with a central estimate of 11.6 million.

It is impossible to estimate the proportion, or number, of dogs that are smuggled puppies as we do not have any information on the age profile of the dog population. It is not even possible to estimate with any certainty the number of puppies as a whole. [Kennel Club registration statistics](#) indicate that around 250,611 puppies were registered with them in 2018 but this is a far from comprehensive estimate of the number of puppies born in the UK per year. The Kennel Club register is restricted to puppies where both mother (dam) and father (sire) of the litter are registered with the Kennel Club.³

2.2 The PETS Travel Scheme

When the PETS Travel Scheme was introduced, and up to 2012, pets had to be 12 weeks old to be rabies vaccinated and wait 6 months for a blood test to prove the vaccine had been effective before they could be issued with a passport under the PETS scheme. This meant that puppies could only travel at 10 months or older.

¹ Defra, [Bringing your pet dog, cat or ferret to the UK](#), website visited 28 March 2019

² [PFMA Dog population estimate 2018](#)

³ [Kennel Club registration FAQs](#).

Changes to scheme

The [Animal and Plant Health Agency](#) provided an explanation in 2011 of why the changes were being introduced that removed this requirement, highlighting the reduced risk to the public of rabies:

The revised rules will deliver substantial benefits to pet owners, making it easier and cheaper for the people who travel from the UK and return with their pets (on average 100,000) each year, and especially for those travelling with their pets for the first time. These changes will also provide UK citizens the same level of free movement with their pet animals which other EU citizens are allowed.

These changes are also scientifically justified. The level of risk to the public has substantially reduced in recent years as the incidence of rabies in domestic and wild animal populations in the EU and other countries has decreased, and the treatments for pets and humans are far more effective. The EU pet movement system has been highly successful, demonstrated by the fact that, with many hundreds of thousands of pet movements across and into the EU, there has not been a single case of rabies associated with the legal movement of pets under the scheme since the system was introduced in 2004.⁴

The Government [consulted](#) on the changes in 2014. The Kennel Club [response to the consultation](#), although generally positive, raised concerns about how effective the change would be in addressing the problem of illegal imports:

The checks on the Pet Travel Scheme will only work if individuals declare themselves as transporting animals. Within this framework of conducting checks, there will be a significant limitation on the effectiveness of enforcement carried out by carriers, regardless of how strict the pet travel rules may be, which the Kennel Club remains concerned about.⁵

The [EU Pet Travel Regulation \(576/2013\)](#) came into force in December 2014 and amended existing requirements setting a minimum age for rabies vaccination. The new rules mean that pets must be 15 weeks old to be able to travel: they must have been vaccinated on or after 12 weeks of age and there is a 21 day wait after vaccination before they can travel. Requirements such as tick treatments were also removed. Defra published [information for pet owners](#) at the time which summarised the changes. On the age requirement, it stated that it would “prevent very young pets being moved across the EU”.

2.3 DEFRA Guidelines on purchasing pets

The demand for puppies is considered to be a significant driver for the illegal imports of very young pets into the UK. Recognising this Defra has published [guidelines](#) on purchasing pets, noting that “illegally imported dogs and cats may not only carry diseases such as rabies but may also be advertised in a way that misleads the buyer regarding the animal’s history, breed or pedigree.” The advice goes on to say the illegal trade in pets puts the health of the animals, and the general public, at risk from diseases including rabies’, warning prospective buyers:

If your new pet is found to be illegally imported and non-compliant with disease control rules, then you may find yourself having to pay for costly quarantine and veterinary bills. If you are unable to meet these costs, this may leave the local authority with no option other than to euthanase (put down) the animal.

Your local authority may conduct an investigation into potential criminal offences. You could become a witness in any further enforcement action.⁶

⁴ APHA, [Pet Travel Scheme Frequently Asked Questions](#), 2011

⁵ The Kennel Club, [Kennel Club Responds To Pet Travel Changes](#), 2014

⁶ GOV.UK, [Bringing your pet dog, cat or ferret to the UK](#), (Accessed 30 October 2017)

3. Welfare and Health Concerns

Charities, including [the Dogs Trust](#), and [the RSPCA](#) have repeatedly raised concerns about the welfare and health puppies being brought into the UK illegally to meet the demands of the puppy trade.

The [Dog's Trust](#) has been running an ongoing campaign to highlight concerns about puppy smuggling and has carried out [four undercover investigations](#) since 2014. The Trust's 2015 investigation, [The Puppy Smuggling Scandal](#), concluded that the importation of puppies had increased as a result of fraudulent use of pet passports; and that undeclared imports were easily carried out particularly at weekends when Trading Standards officials were not routinely available. The Animal and Plant Health Agency is responsible for enforcement, although they do not always have a permanent presence at ports. The Dogs Trust report raised concerns about enforcement.

Both APHA and Trading Standards state that Trading Standards rely upon APHA to provide information to enable them to act. Clearly this cannot happen if APHA are not present and Trading Standards only have a telephone service running out of working hours.⁷

3.1 UK Border Checks

The [EFRA Select Committee](#) published a report on [Domestic Pets](#) in November 2016. The [Government response](#) to the report in January 2017 included details of how checks are currently carried out at the UK borders, and information on non-compliance with the scheme in 2015:

One hundred per cent of checks are carried out on pet animals entering Great Britain on approved routes under EU Pet Travel Scheme. The checks are performed by carriers, or pets checkers acting on their behalf. Defra's Animal and Plant Health Agency (APHA) are responsible for training and appointing carriers and pets checkers. APHA undertake random checks of pet animals to ensure the carriers are performing checks to the required standard. In 2015 APHA completed checks on 5,663 animals travelling into GB. Of the 5,663 animals checked, 73 animals were found to be non-compliant with the EU Pet Travel Regulations. APHA work closely with carriers and pets checkers to address any issues identified and provide any additional training required.

In a [written response](#) from October 2017, the Government set out that approximately 600 puppies have been seized and taken into quarantine since APHA began an initiative in December 2015 to identify and seize smuggled dogs and puppies in collaboration with the Kent Police and [the Dogs Trust](#).

In March 2019, DEFRA [published](#) the number of 'illegally landed' animals, meaning those which are found to have been imported without meeting the requirements of the Rabies (*Importation of Dogs, Cats and Other Mammals*) Order 1974, between 2016 and 2018. These are shown in the table below.

This does not represent the number of dogs smuggled although it may include some which have been imported clandestinely or with falsified documents. The figures also do not include a breakdown by age, so it is not possible to identify how many were puppies.

⁷ The Dog Trust, [The Puppy Smuggling Scandal](#), 2015

ILLEGALLY LANDED DOGS IDENTIFIED BY APHA, BY COUNTRY OF ORIGIN				
	2016	2017	2018	Total
Total	1,287	1,037	440	2,764
Ten most frequent countries of origin				
Poland	265	195	42	502
Hungary	266	150	37	453
Romania	70	135	90	295
Latvia	144	58	12	214
Slovakia	120	56	29	205
USA	60	83	58	201
Lithuania	106	59	3	168
Bulgaria	20	45	31	96
Ireland	49	27	6	82
Spain	27	32	19	78

Source: [Dogs: Smuggling: Written question – 223135](#), 5 March 2019.

Over the three-year period, 2,764 illegally landed dogs were identified, almost half of which came from three countries: Poland, Hungary, and Romania. The number identified in 2018, 440 was substantially lower than in either of the previous two years. In 2016 there were five convictions in relation to the illegal import of dogs. There were two further convictions in 2017, according to a written response from July 2018.⁸

The Dog Trust reports that under its puppy pilot scheme it has looked after and rehomed nearly 1000 seized dogs between 2014 and 2018:

Over the past four years nearly 1,000 dogs have been cared for by our Puppy Pilot, a scheme we established to aid the interception of dogs seized by APHA (Animal and Plant Health Agency) at the ports and provide care and rehabilitation for them prior to finding them new homes.

These dogs would have been worth over £1 million to those illegally importing them. 63% of dogs on the scheme have been French Bulldogs, Dachshunds and Pugs which are amongst the most commonly imported dogs, fetching between £800 - £2,000 per dog.

3.2 Central and Eastern Europe

In their 2017 investigation, [Puppy Smuggling a Tragedy Ignored](#), the Dogs Trust found evidence of puppies under the legal age limit, with falsified papers, being smuggled from Central and Eastern Europe. It also highlighted a failure to comply with welfare requirements for transporting them. It concluded that most puppies arrive from Hungary, Poland and Lithuania with Latvia, Slovakia and Romania also important. The report also raised concerns about limited border checks.⁹ Paula Boyden, veterinary director for Dogs Trust called for increased visual checks and for the PETS travel scheme to be amended:

“The number of prosecutions is far too low and the lack of visual checks at ferry ports and borders is unacceptable. We want to see stronger deterrents including prison sentences for those caught trafficking puppies. To highlight the flaws in the system,

⁸ [Dogs: Imports: Written question 167312](#), 23 July 2018

⁹ The Dog's Trust, [Puppy Smuggling a Tragedy Ignored](#), 17 July 2017.

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we smuggled a fake dog 'Charly' through the border twice – once at Eurotunnel and once at Dover – after no visual checks were made.

“The government must revise pet travel legislation when the UK leaves the EU and ensure that puppies entering this country are healthy, not underage and are not being brought in to sell on to unsuspecting buyers via a scheme meant for non-commercial use.”

Puppies are bred in large numbers, often in horrific conditions in Central and Eastern Europe by corrupt breeders who are continuing to exploit the demand for these desirable breeds in Great Britain. They are brought into the country illegally at a young age in order to appear 'cuter' to buyers, with desirable breeds such as Pugs, Dachshunds, English and French Bulldogs making up 82% of those intercepted at the border.¹⁰

The latest Dog Trust report, [Puppy smuggling When will this cruel trade end?](#) Was published in October 2018. This set out the Dog Trust's [findings](#) following a number of undercover investigations:

During this investigation we uncovered a network of corrupt breeders, dealers and vets, who openly admit to breaking the law to deceitfully export puppies. We also reveal the appalling ways in which puppies are smuggled into the UK. We found:

- Puppies sedated in cramped conditions and forced into 30 hour journeys over 1,000 miles with little water and no toilet breaks, found hidden amongst their own faeces
- Heavily pregnant bitches caged in sickening conditions forced to travel gruelling journeys to allow for the puppies to be born in the UK - young, 'UK born' puppies amount to quicker sales
- Dealers claiming to evade border controls across Europe and describing the scale of illegal exportation; with one Hungarian dealer explaining around 400 puppies are exported each week from his hometown. This equates to 20,000 puppies a year providing an annual turnover of £28million based on the average sale price of £1,400 per puppy* - from just one town alone. These particular puppies were destined for Spain but are an example of the extent criminals are going to, to put profit over puppy welfare
- One dealer highlighted 300 bitches producing 'designer' puppies including French Bulldogs, some of which are then advertised and sold in the UK
- Corrupt vets falsify passports and provide fake vaccination stamps to enable puppies to travel while they are younger than legally allowed, and therefore more desirable, but unprotected against diseases, such as rabies. Some vets were willing to supply sedatives to bring puppies across the UK border without detection with no passport at all
- New trade routes from Serbia, a non-EU country where the most stringent rules of entry into the EU apply - we found evidence of underage puppies being sold with EU microchips and pre-filled European passports and passed off as EU-bred animals for easier entry into EU countries.¹¹

3.3 Ireland

Although there is a great deal of focus on Central and Eastern Europe, they are not the only reported sources of illegally smuggled puppies. There have been several reports in the Irish press in recent years on the issue, with some estimating up to [30,000 puppies a year](#) are [smuggled into the UK](#). Unlike pets from Europe, pets imported from Ireland can

¹⁰ ibid

¹¹ Dog Trust, [Our undercover investigation reveals magnitude of horrifying Puppy Smuggling trade](#), 16 October 2018

come to the UK on private boats or planes. Various agencies, including the police, have been coordinating to address the issue through [Operation Delphin](#) since 2016:

As part of wide-ranging activity at ports, the RSPCA is working in partnership with a number of agencies, under the umbrella of 'Operation Delphin'. These include Border Force; Local Authorities, namely Isle of Anglesey County Council and Pembrokeshire County Council; the DSPCA; ISPCA; SSPCA; USPCA; veterinary surgeons; the Police; HMRC; Welsh Government; APHA; and other agencies, to target illegal puppy traders. The illegal trafficking of puppies is a major issue for the RSPCA, with the charity deeply concerned that large quantities of young puppies are transported into England and Wales, with welfare problems often a major concern.¹²

More recently, in March 2019, 27 puppies were reported to have been seized in Scotland by the SPCA having been illegally imported from Ireland.¹³

4. Parliamentary Debate

The [EFRA Select Committee](#) published a report on [Domestic Pets](#) in November 2016. The report set out three areas of concern: the age at which puppies were allowed entry into United Kingdom; enforcement checks at ports; and intelligence sharing between agencies. The report included a call for the issue of border control for pets to be included in Brexit negotiations, and for the minimum age for a dog to be allowed to travel to be raised to 6 months:

The Pet Travel Scheme (PETS) is providing a vehicle for the illegal importation of puppies. The Government must ensure that negotiations regarding our future relationship with Europe include this issue. The age at which dogs are allowed to enter the United Kingdom under PETS should be increased to six months, thereby reducing their commercial value to smugglers.

We recommend that the Government increase spot checks at entry points into the United Kingdom to enforce the rules on non-commercial trade on domestic animals.¹⁴

The [Government response](#) was published in February 2017. More recently, George Eustice, the DEFRA Minister stated on Brexit, in reply to a written question [PQ 7268](#) on 12 September 2017, that :

Leaving the EU provides us with an opportunity to develop gold standard policies on animal welfare. We are determined to get a good EU exit deal for Britain and we have been absolutely clear we will maintain and enhance our world-leading animal welfare standards.

The Dogs Trust, in its [2017 report](#), called for a number of measures to be implemented following Brexit:

- When the UK leaves the EU, revised legislation must be introduced by Defra as a priority to effectively regulate pet travel and commercial pet movements
- Reintroduce a requirement for a rabies blood (titre) test before entry into the UK, together with a wait period which is in line with the incubation period of rabies
- Reintroduce a requirement for dogs and cats to be treated against ticks before entering the UK.¹⁵

¹² North Wales Police, [Almost 100 puppies rescued at Holyhead in 'shocking example' of illegal puppy trade](#), 16 November 2016

¹³ The Independent, [Inspectors seize 27 Irish puppies being smuggled to Scotland](#), 28 March 2019

¹⁴ EFRA Committee, [Domestic Pets](#), November 2016

¹⁵ The Dog Trust, [Puppy Smuggling a Tragedy Ignored](#), July 2017

The 2018 Dog Trust report includes a number of more detailed recommendations available [here](#).

4.1 Westminster Hall Debate

A [debate on puppy smuggling](#) took place in Westminster Hall on 1 November 2017. During his response the then Minister, George Eustice, set out the three concerns that existed regarding puppies being smuggled into the UK:

First, are there people who are flouting the system altogether, not having any kind of passport or documentation and simply smuggling puppies in in the most literal sense? I have asked that question many times and I can give hon. Members some reassurance. Border Force obviously carries out lots of checks at the border for people who are people trafficking, for drugs, and for customs issues. Whenever they come across dogs that are hidden and do not have the documentation, they alert the local trading standards officers so that they can take action, but we do not get many of those cases. In the last 10 months, there has been one case of people coming in with no documentation at all.

The second issue is whether there are people bringing puppies into the UK on the PETS travel scheme, which is supposed to be for people's pets, with the intention of selling them commercially. That is where there is greater concern and where our efforts have been focused.

The final issue is whether the existing commercial arrangements go far enough, because the truth is that checks under the Balai directive are more thorough than under the PETS travel scheme, but the difference is not that great, and applying that may not achieve very much.¹⁶

The Minister also set out the steps that the Government had taken to address puppies being bred abroad and imported to the UK illegally:

Members know that we have been working with Dogs Trust and the Animal and Plant Health Agency in the Department for Environment, Food and Rural Affairs. Two years ago, following a similar debate to this, I asked them to get involved to toughen our approach at the border, and I can say that where we have come across examples of fraudulent vets, predominantly in east European countries, issuing fake documentation, we have taken action. For instance, the chief veterinary officer has written to authorities in Hungary, Latvia, Poland and Slovakia to highlight in particular the problem of under-age puppies. In January 2017, the Hungarian authorities wrote to advise us that they had responded to our letter and taken action, including police investigations of the veterinary practices and transporters involved. In July 2015, the Lithuanian authorities introduced legislation meaning that passports can now be issued only by a vet from their state veterinary service. Where we have seen problems, we have acted, which has led to change in some of these countries.¹⁷

4.2 Proposed ban on the commercial third-party sales of puppies and kittens

The Government announced [a consultation](#) on banning commercial third-party sales in July 2018, which closed in September 2018, setting out the rationale for the proposals as follows:

Currently, puppies and kittens can either be purchased via a third-party seller, or directly from a breeder. There are no records of the number of puppies sold via third-parties, which makes it difficult to know how many puppies are sold via third parties but estimates vary between 40,000 and 80,000 in Great Britain per year." A number of responses to the Call for Evidence, (e.g. Canine Action UK) suggested that there

¹⁶ [HC Deb c433WH](#) 1 November 2017

¹⁷ [ibid](#)

are about 74 pet shop licence holders actively selling puppies, of which 63 are in England.

There are concerns that commercial third-party sales lead to poorer welfare conditions for the animals compared to when people buy directly from the breeder. [...] We are proposing to ban commercial third-party sales of puppies and kittens in England. This will prevent pet shops, pet dealers, and other outlets from selling these animals in England unless they themselves had bred them. The ban will extend to England only.¹⁸

The Government set out in the [consultation document](#) how it expected the proposed ban to impact on the illegal import of pets:

20. A ban on the commercial third-party sale of puppies and kittens in England would apply to all sales which are conducted in England. This would include third-party sales conducted here relating to animals which have been, or which are subsequently, imported, or puppies and kittens that are bred in other parts of the UK to be sold in England. You are invited to share your views on how these puppy breeders would be affected. The ban would not apply to sales that are conducted outside of England with the puppies and kittens then being delivered to their new owners in England.

21. With publicity for the ban on commercial third-party sales and an encouragement to buyers to source their pet from a legitimate breeder, there should be a significant impact reducing sales which take place in other countries leading to puppies and kittens subsequently being delivered here.¹⁹

The [Government announced](#) in December 2018 that it would be introducing a ban as proposed.

¹⁸ Defra, A ban on commercial third-party sales of puppies and kittens in England, [Overview](#), July 2018

¹⁹ Defra, [A ban on commercial third-party sales of puppies and kittens in England](#), July 2018

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