

# Addressing Puppy Smuggling

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The Environment, Food and Rural Affairs Committee has undertaken a review of puppy smuggling as part of its inquiry into the welfare of domestic pets in England. After seeking written submissions from the public, the Committee held a hearing on October 23 at Westminster to question experts on the trafficking and welfare issues involved in this activity.

The panel comprised Paula Boyden from Dogs Trust, Robert Quest from the City of London Corporation, Danielle Dos Santos of the British Veterinary Association, and Ian Briggs of the RSPCA's Special Operations Unit. The panel responded to some of the broad issues posed by the public submissions and identified potential solutions to problems.

According to the evidence presented at the Committee

Hearing, 300,000 puppies were imported into the UK in 2018. The experts suspect that the official figures under represent the true numbers of puppies brought into the country. There is no demographic information as to the age of the dogs imported or the country of origin. However, intelligence has shown that puppies are smuggled into the UK predominantly from the Republic of Ireland and countries in Eastern Europe.

The current regulations governing the importation of dogs into the UK from other EU countries are the pet passporting scheme and the BALAI directive, the latter of which applies to the importation or exportation of pets for commercial purposes. The pet passporting scheme requires domestic pets travelling from one member state to another to be issued a passport, identifying the pet via description, breed, and microchip number, and also

ensuring that (where necessary) the pet has received rabies vaccinations. Due to the requirement for dogs to receive the rabies vaccine, the pet passport scheme prevents dogs from travelling into the UK until they are over the age of 15 weeks – in theory.

However, the hearing addressed the issue that many dogs being “smuggled” into the UK are being transported on fraudulent paperwork. The ease by which this occurs is exacerbated by the identification procedures adopted when checking pet passports. So whilst border officials check the animals’ paperwork, there is no clear requirement or training to ensure that the passport’s description of the particular animal matches the animal being transported.

Ms. Boyden described the situation as akin to someone walking through border control at an airport with a copy of their passport, but with a paper bag over their head. Officials may be glancing at the paperwork, but are not inspecting the animal carefully, or at all. The panel discussed a famous example that demonstrated how lacking the inspection process is by noting how a stuffed dog toy, which was

supposedly a live animal and issued with a passport, was not once checked when passing through the border.

The failure to identify the dogs means that large numbers of puppies are brought into the country that are under the legal age requirement. Ms. Boydon mentioned that the youngest puppy they had encountered was 4 weeks old, significantly under the age minimum and far too young to be safely transported. One reason smugglers forge paperwork is due to popular demand for puppies that are as young as possible as this is when they are perceived to be at their “cutest”.

Related to the issue above is the difficulty that border officials have in ageing dogs. This is because many border officials do not have any kind of training that relates to animals. Ms. Dos Santos noted that even vets can find it difficult to establish the age of young puppies. Therefore, the panel recommended providing basic training to border officials on a variety of matters, and also – crucially – increasing the legal age at which dogs can be imported into the UK. Dogs Trust proposed raising the minimum age to 24 weeks, at which time it would be significantly easier

to determine whether a puppy is underage.

Further, under the pet passport scheme, individuals can travel with up to five dogs, yet the vast majority of dog owners only have between one and three dogs. The panel believes it highly likely that those travelling with five dogs are trafficking them. At the very least, the experts raised the issues as to whether officials could question people entering the country, including asking questions about their intentions, where they live, and whether they are able to care for so many dogs. It was noted however, there were limitations to this procedure as people could advise what their intentions are at the border, but simply say at a later date they changed their mind and there is no sanction for this. It was suggested that a better option could be to lower the number of dogs that could be transported to three.

The hearing also addressed numerous other issues within various regulatory schemes, including loopholes in microchipping legislation. Every pet in the UK is required to be microchipped. However, there is no requirement for that chip to be registered on a UK database. This huge oversight allows smugglers to

seemingly meet the requirements of the legislation while also avoiding being easily traced. Experts hope that the introduction of Lucy's Law, regulating the sale of dogs and preventing third party sales, will help address this issue. But the panel noted repeatedly that the existence of legislation alone will not address these issues; effective enforcement is key.

Traceability of dogs seemed to be the key phrase of this hearing. Foreign microchips not registered on any UK databases are a large part of that problem, but there are homegrown issues to address as well. The experts stated the need to more documentation for puppies bred in the UK.

While larger breeders need to be registered, an idea was floated to also require them to produce license numbers. Also, the law does not require registration for a person breeding fewer than 3 litters per year. However, this is a loophole that is easily abused, and so a stronger regulatory scheme addressing this loophole was discussed in order to increase traceability of dogs. Indeed, the panel identified traceability as one of the most pressing issues.

The committee noted the broad concerns that puppy smuggling creates for the general public. The first concern is that the welfare of many of these dogs is compromised. These animals are often bred in squalid conditions and transported in a manner that has little regard for their welfare. Consequently, they may develop health and behavioural problems. Unwitting buyers of these dogs are then responsible for pets that can have congenital problems and behavioural issues due to poor breeding that can be very costly to address, as well as cause a huge degree of emotional distress. Some of these dogs are so ill that they require euthanasia, a devastating outcome for all involved.

This trade also presents a threat to public health. If dogs are smuggled in without having had proper veterinary care and necessary vaccinations, the UK runs the risk that diseases may be introduced that place both animal and human health at risk.

All members of the panel agreed that one crucial step in addressing the illegal dog trade is to stem demand. This would require educating the public about the puppy smuggling industry. Increasing awareness of responsible buying will, it is hoped, help curb any purchases of puppies made on a whim and will help guide the public towards responsible breeders and rescues instead.