

PE1640/F

Dogs Trust submission of 3 August 2017

Thank you for your email of 6 July 2017 inviting Dogs Trust to make a written submission regarding this petition.

Dogs Trust is broadly supportive of this petition. There have been significant advances in the understanding of dog behaviour and welfare in recent decades which show that requirements for socialisation and habituation should be an integral part of breeding legislation. In addition, the recent growth of online classified sites has led to increasing numbers of people using the internet to source their pets. We therefore consider the current legislation governing the breeding and sale of dogs immensely outdated and believe it is in urgent need of updating and strengthening.

Dogs Trust agrees with Ms Bryant's call in her oral evidence session with the Committee on 11 May 2017 for a robust licensing system; the current Regulations in Scotland need to go much further if they are to tackle unscrupulous breeders and sellers. We propose that anyone breeding, selling or transferring the ownership of a litter, regardless of any financial transaction or gain, should be required to be registered. Further to this, anyone breeding, selling or transferring the ownership of more than one litter, regardless of any financial transaction or gain, should be required to have a licence. There should be a link-up between individuals and their address so that it is possible to identify situations where multiple individuals are evading licensing by individually registering to breed or sell animals on the same premises.

Dogs Trust chairs the Pet Advertising Advisory Group (PAAG) which was created in 2001 to combat growing concerns regarding the irresponsible advertising of pets for sale, rehoming, and exchange.

Since its formation PAAG has witnessed a significant increase in the number of pets and animals sold online. On some of the bigger sites PAAG engages with, such as Gumtree and Preloved, there are generally at least 20,000 animals being advertised for sale at any one time. The full size of the online trade in animals – through unaccountable sites and areas of sites such as closed groups on Facebook - can only be speculated on, however it seems certain to run in the hundreds of thousands of animals for sale online at any one time.

Due to our serious concerns around the sale of dogs, we believe that all forms of advertising, including online, should be required to display the seller's registration or licence number, depending on the number of litters they have bred as outlined above. In conjunction with this, we believe that a centralised, publicly accessible list of registered and licensed breeders and sellers should be kept or facilitated by the Government to enable websites and buyers to check the legitimacy of breeders or sellers. This would allow a simplified system that would be easily accessible for

purchasers to verify where and from whom they are buying a dog in an increasingly online.

Furthermore, inspections of animal establishments are currently often conducted by Local Authority officials with no or limited knowledge of animal welfare. We strongly believe that anyone inspecting animal establishments should be qualified in animal welfare. Dogs Trust recommends that the Government develops a central unit of appropriately trained inspectors which can be utilised by Local Authorities to carry out inspections of animal establishments. This inspectorate unit would need to have no profit-making commercial interests in order to ensure that the goal is not on profit but on animal welfare. Licence fees should be set by Local Authorities to allow full cost recovery for this.

Dogs Trust welcomed the question Ms Bryant raised about how many litters a breeding bitch should have in her lifetime as we are concerned that the current Regulations do not go far enough to protect the health and welfare of the breeding bitch and her offspring. We believe that the maximum number of litters a bitch can have in her lifetime should be reduced to four and an upper age limit should be set. We would suggest that bitches over eight years of age must be examined by a veterinary surgeon and certified to be suitable before being used for breeding.

In animal establishments other than boarding establishments, we recommend that it should be a condition of the licence that dogs must be kept in compatible pairs or small groups, except when they are whelping, with puppies or under veterinary advice. Animal establishments must also have structured socialisation and habituation programmes in place. It's essential that dogs in animal establishments are provided with environmental enrichment and the ability to have some control over their environment. Licences must also detail the maximum number of all dogs and all puppies to be present on the premises at one time.

Ms Bryant commented on her concerns about the breeding of dogs with genetic conditions. Dogs Trust firmly believes that there is sufficient evidence to support the need for such Regulations to be made to protect the welfare of breeding dogs and their offspring. Puppies bred with little regard to their conformation or inherited defects may go on to experience health problems for a significant part of their lives. A condition of a breeding licence should therefore be a duty of care for breeders, which takes effect prior to mating. This duty could be phrased as: "any person who selects a companion animal for breeding shall be responsible for having regard to the anatomical, physiological and behavioural characteristics which are likely to put at risk the health and welfare of either the offspring or the female parent". This should include a requirement to avoid breeding from dogs with exaggerated conformational defects as well as a requirement to carry out appropriate health screening tests for inherited defects commonly found in the breed (for example hip scores for hip dysplasia or eye screening for inherited eye conditions).

Dogs Trust is also supportive of Ms Bryant's call for animal rehoming organisations to be regulated and we welcomed the news earlier this year that the Scottish Government is committed to exploring new laws to regulate in this area. We urge the Government to push forward these proposals without delay in order to make sure the welfare requirements of the animals are being met.

Dogs Trust's work on the illegal importation of puppies has revealed that a significant number of puppies for sale online are being illegally imported from Central and Eastern Europe via the existing pet travel legislation, commonly known as the Pet Travel Scheme (PETS). With this in mind, we welcome the petition's call for the Scottish Parliament to urge the Scottish Government to investigate what action it can take to address the illegal importation of puppies.

Following the changes to PETS in 2012, which aimed to harmonise pet travel across Europe, there has been a significant increase in the numbers of puppies being brought into Great Britain for sale illegally. In addition to the welfare issues associated with such activity, Dogs Trust is also concerned about the increased potential for infectious diseases entering the UK as a result of this. This includes not only rabies, but also non-endemic diseases, which are not directly covered by the PETS or Balai Directive requirements.

Dogs Trust recently launched its third investigation (www.dogstrust.org.uk/puppy-smuggling) into the illegal importation of puppies from Central and Eastern Europe. Our previous investigative work in this field revealed that each year thousands of puppies are illegally imported into Great Britain under PETS. These puppies are often underage, with fraudulent veterinary records and transported for days in unsuitable conditions, destined to be sold via online adverts to unsuspecting members of the public. This not only presents a serious animal welfare concern but also a risk to public health and puts additional pressure on Local Authorities.

In December 2015 we launched The Puppy Pilot. This landmark initiative aims to disrupt the trade by facilitating the seizure of and providing veterinary care and financial support for illegally imported puppies which otherwise would have been put to sleep or turned away at the borders, only for the traders to try bring them into the country at another time instead. Puppies seized under the initiative at Dover are rehomed responsibly through our network of rehoming centres, once they have completed their quarantine.

Puppy Smuggling: A Tragedy Ignored is a culmination of our two previous investigations and findings from our funding of The Puppy Pilot, and demonstrates the increasing sophistication, scale and depth of the dealing networks and the ongoing ease with which dogs can enter the country unchecked. The investigation confirms that little has changed since Dogs Trust's last report in July 2015, with further evidence of breeders in Lithuania and Poland selling underage puppies and

arranging for passports to be issued by local vets willing to falsify the details; and of transporters willing to carry these underage pups into Great Britain.

A key reason for this trade is the huge demand in Great Britain for fashionable breeds such as French Bulldogs, Dachshunds and Pugs, and the limited supply of such puppies from reputable breeders in the UK. Great Britain remains a particular target for dealers of these puppies because of the huge prices people are willing to pay for these breeds and the relative cheapness with which they can be produced in source countries.

The motivations of the consumers fuelling this trade have yet to be investigated in depth in the UK, and we therefore welcome that the Scottish Government is undertaking research to determine what action can be taken.

Alongside this, Dogs Trust is calling for immediate action to address the abuse of PETS, including a shift in the enforcement of this legislation from the carriers to Government agencies. This should include a requirement for there to be sufficient out-of-hours and weekend cover at ports by Government agencies. Dogs Trust is also calling for the Government to introduce prison sentences to reflect the seriousness of the crimes committed and deter those involved in illegally importing dogs

As EU legislation is the basis for the UK's pet travel rules, exiting the EU presents a crucial opportunity to review and amend legal requirements which could not previously be changed by the UK alone. 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.

Dogs Trust is calling on the Government to introduce a requirement for a rabies blood test before entry into the UK, together with a wait period which is in line with the incubation period of rabies, as well as a requirement for dogs and cats to be treated against ticks and a shortening of the tapeworm treatment window, before entering the UK. You can read Dogs Trust's recommendations in full in our third report at www.puppysmuggling.org.uk

Dogs Trust fed these recommendations into the consultation on a review of the Non-Commercial Movement of Pet Animals Order 2011, held jointly by Defra, the Scottish Government and Welsh Government in 2016. We look forward to an announcement being made on what action will be taken in response.

In summary, for the reasons outlined above Dogs Trust broadly supports Elaine Bryant's petition. We hope this response provides more detail on our position but if you require any further information please do not hesitate to contact Dogs Trust.