

PE1640/G

British Veterinary Association (BVA) Scottish Branch and British Small Animal Veterinary Association (BSAVA) joint submission of 8 Aug

- 1) BVA is the national representative body for the veterinary profession in the United Kingdom and has over 16,000 members. Our primary aim is to represent, support and champion the interests of the veterinary profession in this country, and we therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.
- 2) BVA's Scottish Branch brings together representatives of the BVA's territorial and specialist divisions, government, academic institutions and research organisations in Scotland. The Branch advises BVA on the consensus view of Scottish members on Scottish and United Kingdom issues.
- 3) The British Small Animal Veterinary Association (BSAVA) exists to promote excellence in small animal practice through education and science. It is the largest specialist division of BVA representing over 10,000 members, of which over 500 are based in Scotland, the majority of whom are in general practice and have an interest in the health and welfare of a wide range of small animals, including dogs.
- 4) Vets see first-hand the tragic consequences that can result from irresponsible dog breeding and illegal importation of puppies, with unnecessary suffering caused to bitches, their puppies and owners.
- 5) In order to effectively tackle the illegal puppy trade and irresponsible breeding the veterinary profession, stakeholders from across the animal health and welfare agenda, Government, local authorities, as well as responsible dog breeders, vendors and prospective owners, must work collaboratively to disrupt the demand for, and consequently supply of, irresponsibly bred and/or illegally imported puppies.
- 6) We welcome the opportunity to comment on the action called for in the petition, particularly with regard to the veterinary profession's role in safeguarding the welfare of the animals in their care, as well as the broader themes raised, including microchipping, licencing, registration, pet travel and education.
- 7) Understanding purchasing behaviours and identifying areas for action
We are looking forward to the publication of the Scottish Government's Scoping Research on the Sourcing of Pet Dogs from Illegal Importation and Puppy Farms. A deeper understanding as to why pet owners source their pet dogs from illegal imports and puppy farms is paramount in identifying areas for effective action and enforcement. In terms of understanding what drives demand for illegal imports and puppy farming, as well as the educational and legislative interventions that may be needed to address this, the Public Petitions Committee may also be interested in [research led by Dr. Rowena Packer assessing what influences the public to buy the popular flat-faced \(brachycephalic\) dogs and their purchasing behaviours](#). Although the issue of illegal imports relates to a range of dog breeds, this report on brachycephalic breeds provides some insight into the factors that influence potential owners when buying a puppy.

- 8) The responsibility of the veterinary profession
BVA and BSAVA welcomed the [Scottish Government's introduction of compulsory microchipping in 2016](#). We support compulsory microchipping strengthened by an enforced registration process to reunite lost dogs with their owners and encourage responsible ownership and breeding.¹ In order to ensure compulsory microchipping is effective in this aim, we believe that a single point of entry across databases is essential and should be included as a minimum standard for commercial databases.
- 9) Wherever possible vets should advise the owner of their legal requirement to have their dog microchipped. There is no statutory obligation for veterinary professionals to scan a dog except before rabies vaccination and the issuing of a Pet Passport, or completing other official documentation that requires identification of the animal.

BVA and BSAVA recommend microchip scanning on first presentation at the practice to ensure the animal is correctly identified by cross-referencing with microchip databases. Scanning is also recommended:

- a. Prior to microchip implantation to ensure that no other microchip is present;
 - b. On presentation of a lost or stray animal to facilitate reunification with the owner;
 - c. Before travelling abroad or at an annual health check to ensure that a previously implanted microchip is still working and has not migrated significantly from the implantation site;
 - d. Prior to carrying out official health screening/tests to ensure that the animal is correctly identified.
- 10) Veterinary surgeons in the UK are required by the RCVS Code of Professional Conduct to ensure the health and welfare of animals committed to their care:

'Veterinary surgeons must make animal health and welfare their first consideration when attending to animals.'

If the veterinary profession were required to play a role in enforcing owners' compliance with microchipping legislation this may cause negative unintended consequences for animal welfare by compromising the vet-owner relationship. This crucial relationship is based on trust and confidentiality and if compromised could act as a disincentive to accessing veterinary advice and care, ultimately impeding the profession's primary responsibility to protect animal health and welfare and potentially further compromising the health and welfare of irresponsibly bred or illegally imported puppies.

- 11) To support owners in their compliance with compulsory microchipping legislation, BVA and BSAVA have [produced various resources and communications outputs](#) in a bid to raise awareness of the owner's legal responsibility to ensure that their dog is microchipped. This has included developing posters to be displayed in veterinary waiting rooms to encourage

¹ See [BVA Scottish Branch and BSAVA joint response to Promoting responsible dog ownership in Scotland: microchipping and other measures \(2014\)](#)

owners to microchip, infographics for use by the profession on social media to raise awareness, as well as issuing regular press releases and guidance for veterinary professionals on their legal responsibilities.

- 12) In terms of monitoring and reporting the illegal importation of dogs, the profession is not obligated to report suspicions to the local authority, however the obligation to report suspicions of illegally imported dogs is a moral and ethical consideration that the profession takes very seriously. BVA's Voice of the Veterinary Profession survey, which surveyed over 1,000 vets from across the UK, revealed that in 2016 almost a third of companion animal vets surveyed had concerns regarding the illegal importation of dogs. These concerns were for several reasons including foreign microchips and the puppy's age not matching the age given in its passports, with some vets also citing the puppy's health as a problem after seeing cases including but not limited to, parvovirus and kennel cough. However, some vets also told us that they felt that they were unable to report these concerns to Trading Standards due to a lack of evidence to substantiate suspicions. In addition, others commented that they found it 'difficult' or 'very difficult' to report their concerns to Trading Standards, with some unable to find the correct point of contact and others reporting that Trading Standards appeared 'unconcerned' in following up on this type of case.
- 13) Breeding, licensing and registration
With regard to ensuring responsible breeding and healthy lines of dogs, BVA and BSAVA recommend that dog breeders use recognised health schemes to screen dogs for inherited diseases and conformational issues, enabling breeders to make informed decisions as to whether dogs are suitable for breeding. Examples of such health schemes include the [Canine Health Schemes](#), which BVA and the Kennel Club work in partnership to provide.
- 14) BVA and BSAVA always recommend that anyone considering buying a puppy only buys directly from a reputable breeder (such as a member of the Kennel Club Assured Breeder Scheme) or considers giving a home to a rescue dog from a recognised rehoming charity.
- 15) We always advise that puppies should only be bought if the mother is present and we would prefer that puppies were not sold from pet shops unless they can be seen with their mother so that buyers are aware of the provenance of their dogs. We would also advise anyone buying or selling a puppy to use the freely downloadable [Puppy Contract](#), which has been developed by the RSPCA and the Animal Welfare Foundation (AWF) to empower puppy buyers and help them to avoid the problems that can arise from buying a puppy from an irresponsible breeder.
- 16) We are members of the [Pet Advertising Advisory Group](#) (PAAG) that is working to address the increasing problem of inappropriate adverts for pets appearing on classified websites. PAAG has produced set of minimum standards for websites to adhere to, as well as success criteria for websites to aim towards to ensure that pets are advertised in a responsible way. PAAG also encourages prospective owners to exercise caution when looking to buy an animal via an online advert and [has produced guidance](#) to help buyers to navigate and identify responsible online adverts.

- 17) We believe that current animal licensing legislation in Scotland should be revised to take into account the changes that have occurred since it was originally established. Any revision to animal licensing legislation should address modern practices of breeding, supplying and buying pets, including internet sales and animal rescue/rehoming organisations to strengthen regulation around dog breeding and sales. A similar review is currently being undertaken for [animal establishment licensing in England](#). BVA, BSAVA and BVZS are also involved in the development of the schedules and guidance on breeding, boarding and vending as part of this review and would welcome similar opportunities to input into any review of animal establishment licensing in Scotland.
- 18) In terms of statutory breeder licencing in Scotland, we believe that this should be brought in line with The Animal Welfare (Breeding of Dogs) (Wales) Regulations 2014, where the statutory licensing threshold for dog breeders is set at three or more litters per year. However, we consider that the licence and inspection criteria should apply to the establishment rather than to individuals as it would then pertain to all dog breeding in that household or premises.
- 19) We are aware that it is currently difficult to identify all those who require licencing and would therefore also recommend that anyone breeding from a dog should be required to register (preferably online) with their local authority (with the data treated in line with the Data Protection Act 1998). This would mean that the local authority had a list of contact details for all dog breeders in their area, aiding enforcement bodies and ensuring that dog breeders were aware of the legal requirements. There should be a publicly available national list of dog breeders, to provide intelligence for enforcers and allow the public to check the list. Should the threshold of three or more litters per year be met, this would trigger a dog breeding licensing inspection. Enforcers should also be able to cross check between individuals and premises to avoid more than one person breeding under the breeder licence threshold from the same premises. If there were other concerns or complaints in the meantime, a visit could be carried out under the Animal Welfare Act (Scotland) 2006 or other relevant legislation.
- 20) We believe that any breeder registration process should be simple and inexpensive so as to avoid the unintended consequence of acting as a disincentive to responsible dog breeding in the UK. If barriers to responsible breeding in the UK are created, this could result in demand for puppies outstripping UK supply, potentially driving buyers towards illegal imports from outside of the UK.
- 21) Further, we believe that it would be of value to engage with stakeholders to explore the possibility of making the system self-funding in some areas eg. pet vending so that regulatory costs will become absorbed into the routine pricing associated with licence charges and buying pets. This would work to ensure that councils have the capacity and resource to inspect, regulate and enforce dog breeding and vending licensing in a uniform and effective manner.
- 22) We recognise that a dog licensing system could have a role to play in increasing responsible ownership. However, we believe that there is limited value in introducing new legislation that cannot be properly enforced or local

authorities would struggle to enforce given the current climate of resource constraints. In addition, we remain to be convinced that funds from a dog licensing scheme could be adequately ring-fenced for enforcement purposes. We are concerned that a dog licensing scheme may create extra bureaucracy and expense for local authorities and act as a barrier to dog ownership for vulnerable groups.

- 23) As part of any update to animal licensing legislation, we would also support that vendors be required to provide written information from a recognised source to prospective owners about how to meet the five welfare needs of their pets, as well as requiring a period of reflection to prevent impulse purchases that drive demand for irresponsibly bred or illegally imported puppies.
- 24) With internet sales facilitating a 'click and collect' culture that enables impulse purchasing, we also believe that requiring a prospective owner to complete a short online questionnaire to demonstrate that they understand the responsibilities of pet ownership, how to meet the welfare needs of the animal they are taking on and how to source a responsibly bred pet would help the pet owner make an informed decision in terms of pet selection and reduce demand for irresponsibly bred dogs. Further consideration would need to be given as to who would check and retain these questionnaires. For an example of what such a questionnaire could look like and the areas it could cover, please see the questionnaire developed by the Advisory Council on the Welfare Issues of Dog Breeding on [Buying a Puppy](#).

25) Pet Travel

Whilst the EU Pet Travel Scheme has made pet travel easier and less expensive for owners, there is increasing acknowledgement that the changes to the Pet Travel Scheme in 2012 have resulted in negative unintended consequences with the increase of puppies being imported illegally for sale through abuse of the non-commercial routes. BVA is aware of concerns that large numbers of puppies being imported from Europe (particularly Central and Eastern Europe) do not comply with the legislation, either because they are being brought for commercial purposes under the non-commercial Pet Travel Scheme; or in order to fulfil public demand, they are being brought in below 15 weeks of age (the minimum age that complies with the Scheme and under which it is difficult to accurately age puppies).

Defra's scientific risk assessment of the changes implemented in 2012 concluded that the changes would result in a risk status of very low or negligible². However, it is unlikely that this assessment took into account the scale of the illegal importation of puppies through abuse of the Scheme and the unknown disease status of these animals.

- 26) In order to address these concerns BVA supports extending the waiting time post-rabies vaccination to 8-12 weeks (at present the wait time stands at 21 days). This has the potential to reduce the misuse of non-commercial routes for the illegal imports of puppies for sale (because the puppies will be older

² Veterinary Laboratories Agency (2010) "A quantitative risk assessment on the change in likelihood of rabies introduction into the United Kingdom as a consequence of adopting the existing harmonised Community rules for the non-commercial movement of pet animals."

and past their most saleable age) and therefore reduce the negative welfare implications for puppies imported via this route³, and the likely negative welfare experienced by the breeding bitches supplying these puppies.

In addition, extending the post-rabies vaccination wait time to 8-12 weeks would further reduce the disease risk posed by puppies of an unknown origin by aligning the post-vaccination wait time with the average incubation period for the disease.⁴

Brexit negotiations around the Pet Travel Scheme therefore present the UK Government with an opportunity to extend the post-rabies vaccination waiting time to 8-12 weeks to reduce illegal trade in puppies for sale via the non-commercial route and the associated negative welfare implications for puppies who arrive in the UK via this route.

- 27) Puppies that are illegally imported from irresponsible breeders may not have received tapeworm and tick treatments or vaccinations. Consequently, as illegal imports of puppies rise, so does the risk of the introduction of exotic diseases to the UK that could pose a risk to both animal and public health. For example, the tapeworm *Echinococcus multilocularis* (EM) is relatively benign in dogs, but the resulting disease in humans – *Alveolar echinococcosis* – is an invasive, cancer-like cystic state of the parasite and can be fatal if not treated. In addition, the removal of the requirement for tick treatment under the Pet Travel Scheme has increased the risk of tick-borne diseases entering the UK, which has been demonstrated by *canine babesiosis* cases in Essex in 2016, including one report of an autochthonous case.⁵ The vector-borne diseases *leishmaniosis*, *ehrlichiosis* and *babesiosis* are zoonotic and so present a risk to public health as well as posing a significant welfare impact on an immunologically naïve population of animals.

To address the risk of exposure to non-native tick species and potentially zoonotic vector borne disease that is presented by illegally imported dogs, as part of Brexit negotiations BVA is also calling on the UK Government to reintroduce tick treatments for all cats and dogs travelling under PETS alongside the introduction of tapeworm treatment for cats as well as dogs. Likewise, we also support the EFSA recommendation that consideration should be given to shortening the tapeworm treatment window from 24-120 hours to 24-48 hours before entry into the UK.⁶

- 28) It is important to note the [recent case of brucellosis \(a highly contagious zoonotic disease that can be transmitted to puppies from previously infected mothers\) in a rescue dog imported from Romania, which was presented to the University of Glasgow Small Animal Hospital](#). This is in addition to two other reported isolations of *Brucella canis* in dogs imported from Eastern

³ [Dogs Trust \(2017\) Puppy Smuggling – A Tragedy Ignored \[pdf\]](#)

⁴ Greene (2011) *Infectious Diseases of the Dog and Cat*. 4 ed. s.l.:Elsevier

⁵ Johnson, N. (2016) Tracing disease emergence: canine babesiosis in the UK. *Vet Rec.* 179: 356-357 doi: 10.1136/vr.i5372

⁶ EFSA Panel on Animal Health and Welfare (2015). Scientific opinion on *Echinococcus multilocularis* infection in animals. *EFSA Journal* 2015;13(12):4373, 129 pp. doi:10.2903/j.efsa.2015.4373 [online] Available at: <http://onlinelibrary.wiley.com/doi/10.2903/j.efsa.2015.4373/epdf> [Accessed 3 August 2017]

Europe in the UK this year.^{7,8} Given the rising number of puppies that are being illegally imported from Central and Eastern Europe where there is a known prevalence of *Brucella canis*, we are concerned that we may see an increased prevalence of this disease - a threat to both human and animal health - in the UK. We would therefore welcome further consideration as to whether Brexit negotiations around the Pet Travel Scheme could provide a viable opportunity to reduce disease risk and limit imports by requiring that all dogs imported to the UK are screened for *brucellosis*.

- 29) In addition, it may be possible to mitigate the risk of abuse of non-commercial movements by restricting the number of animals that can travel to five per consignment rather than five per person (unless attending or training for a competition, show or sporting event where, in line with current legislation, written evidence of event registration must be provided). For puppies under 6 months the number could be restricted to two per consignment, with a total of three animals allowed per consignment. This would accommodate 96.2% of UK households travelling under the Pet Travel Scheme.⁹ Likewise, an amendment of the Pet Animals Act to cover commercial sales over the internet could be considered.
- 30) Further, we do not believe that enforcement provisions have been fully appropriate and effective for enforcing the Pet Travel Scheme, leading to abuse of the scheme and increased illegal imports. The main areas of concern are fraudulent documentation, puppies being moved under the pet travel scheme when they are intended for sale (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), and underage puppies.

We believe that enforcement provisions could be improved and would question whether the carriers are the right people to undertake routine checks. Authorised officers may benefit from veterinary-delivered training or guidance. Moreover, we believe the checking procedure itself should be revised to ensure that an enforcement officer must visualise the animal and microchip that is being scanned.

Given that the number of movements of dogs per year has increased year on year since the introduction of the Pet Travel Scheme in 2011¹⁰, we are concerned that this has outstripped resources available to check and enforce pet-travel legislation, increasing the risk of non-compliance.

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.

⁷ (2017) *Brucella canis* in a dog in the UK *Veterinary Record* **180**, 384-385. Available at: <http://veterinaryrecord.bmj.com/content/180/15/384.2.long> [Accessed 3 August 2017].

⁸ (2017) Second UK isolation of *Brucella canis* *Veterinary Record* **180**, 617. Available at: <http://veterinaryrecord.bmj.com/content/180/25/617.3> [Accessed 3 August 2017]

⁹ Murray JK, Browne WJ, Roberts MA, Whitmarsh A, Gruffydd-Jones TJ (2010) Number and ownership profiles of cats and dogs in the UK. *Vet Rec.* 166 (6): 163-168. 10.1136/vr.b4712.

¹⁰ Dogs Trust (2017) Puppy Smuggling – A Tragedy Ignored [pdf] Available at: <https://www.dogstrust.org.uk/puppy-smuggling/ps-media>

- 31) Responsible ownership and the importance of education
We believe that education and good quality information is key to increasing responsible ownership; reducing demand for, and therefore disrupting the trade of, irresponsibly bred and illegally imported dogs.
- 32) According to the [PDSA Animal Wellbeing \(PAW\) Report \(2017\)](#), 13% of dog owners in the UK did no research at all before buying their pet. It is important that owners are given the tools to make an informed choice about the puppies they are buying and obtain transparent information about their provenance. We would advise anyone buying or selling a puppy to use the freely downloadable [Puppy Contract](#). The document contains information from the buyer or seller and gives them an opportunity to demonstrate the measures they have taken to ensure the health and welfare outcomes of the puppies in their care.
- 33) Likewise, we would always encourage prospective owners to consult with their local vet if they are thinking about buying a pet. Vets have a role in educating owners on what constitutes a healthy breed or cross-breed, how to meet the five welfare needs of the pet in question, how to source from a responsible breeder, choosing the right pet for their lifestyle, the costs involved in keeping a pet and how to meet the legal requirements of being a pet owner eg. compliance with compulsory microchipping legislation. BVA has also produced various resources to support pet owners in making informed choices when purchasing a pet and providing the best possible care: [You and your vet](#).
- 34) We would welcome a public information campaign to increase responsible ownership and awareness of responsible breeding. As part of its [Animal Welfare Strategy](#), BVA and its specialist divisions have committed to supporting animal welfare advocacy to help ensure that animal owners and policy makers understand the animal welfare costs associated with different types of animal use, including irresponsible breeding and illegal importation.
- 35) As part of this strategy, we are working to produce guidelines for the responsible use of pets in advertising. We hope these guidelines will enable us to work with advertisers to ensure that the general public receives messaging that promotes responsible ownership of animals with healthy conformation, in settings where their five welfare needs are adequately met. We also hope that these guidelines will reduce the use of 'fashionable' breed types with inherited health issues such as pugs and French bull dogs in marketing materials and in turn, work to stem the demand for these breed types that stimulates illegal trade.
- 36) In addition, BVA has outlined actions to develop school packs to facilitate veterinary engagement with children on animal welfare principles and concepts. We also support the Animal Welfare Education Alliance (AWEA) and its campaign to include animal welfare in the national curriculum to raise awareness of the need for responsible ownership.

37) Concluding remarks

The veterinary profession has a clear role in supporting existing and prospective pet owners to exercise responsible ownership and informed choice when purchasing a puppy.

The profession's overarching responsibility, as outlined in the RCVS Professional Code of Conduct, is to make animal health and welfare their primary consideration when attending to an animal. As such, we believe that any decision by a veterinary surgeon to report to an enforcing body should always be proportionate and based on an understanding of the animal's health and welfare, the owner's attitude, and the potential seriousness of the individual issue.

Any action taken against irresponsible dog breeding and illegal importation must be part of a collaborative approach across relevant stakeholders that tackles supply as well as demand. To be as effective as possible, efforts to disrupt irresponsible dog breeding and illegal importation should be supported by a reviewed legislative framework that strengthens current breeder and vending licensing requirements and is effectively resourced to facilitate enforcement.