

PUPPY SMUGGLING

When will this cruel trade end?



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FOREWORD

In the summer of 2018, Dogs Trust carried out a fourth investigation into the illegal importation of puppies. We wanted to highlight to Government once and for all the huge impact this illegal trade has had and continues to have, firstly on the British public, both financially and emotionally, and secondly on the potential health and welfare of the animals involved. We offer evidence of industrial scale imports of puppies from Hungary and, more alarmingly still, we provide evidence of the possibility of a trade coming from an unlisted Third Country, Serbia, which is outside of the EU and where there are more stringent rules before dogs can enter the UK, but where worryingly these rules are being flouted. (See page 7 for further information).

When Dogs Trust published its first investigative report, *The Puppy Smuggling Scandal*, in November 2014, we hoped it would result in improvements to prevent the widescale abuse of pet travel rules. We commissioned the report following changes to the non-commercial Pet Travel Scheme (PETS) in 2012 which harmonised pet travel across Europe. The new rules enabled puppies as young as 15 weeks to obtain passports and travel to the UK when previously the minimum age of entry was approximately 10 months. This means puppies can now enter the country when they are younger and more enticing to buy and adult dogs only need to wait three weeks after receiving a rabies vaccination before travelling.

Unfortunately, these changes have resulted in a sharp increase in the numbers of puppies entering Great Britain (GB) for sale and more recently adult dogs for rehoming – as our investigations made clear, many have done so illegally and with no regard to the welfare of the animals.

We uncovered widespread abuse of PETS with commercial dealers in Hungary and Lithuania using the scheme to illegally import puppies into GB to sell; unscrupulous vets falsifying age and vaccination records in passports; and ineffective controls at the GB border, with little or no sharing of information between key agencies and no visual checks made on animals entering the country.

Between 2015 and 2017, two further investigations: *The Scandal Continues* and *A Tragedy Ignored*, expanded our work into Romania and Poland; it confirmed that illegal activity was continuing unabated in Lithuania; and demonstrated how commercial dealers continued to abuse PETS.

These investigations proved beyond doubt that border controls are laughably lax, with our investigators bringing a child's toy dog through GB border control on fake passports on five occasions without being detected by customs officials. We also travelled on a Postbus (postbuses are mini vans which transport people and goods across Europe) from Lithuania on a 1,000 mile journey to GB. We discovered four puppies were also being transported with the other luggage - just a handful of those who make this journey every single day in similar conditions. The puppies were given water just twice in 30 hours in temperatures of 25 degrees, and were not fed or given toilet breaks at all. We also discovered vets willing to provide sedatives to keep puppies quiet allowing them to be smuggled into the country, avoiding declaring them altogether.

We had hoped that the mountain of evidence that we have laid before Government and our recommendations for change would have been met with robust measures at the border and effective deterrents for the criminals involved in this cruel trade. Yet whilst we have been met with supportive words, four years on from us first highlighting the issue to Government, there are *still* no significant penalties or sanctions for the illegal importers and plenty for them to gain.

With less than six months until EU Exit, we want to ensure that prevention of the illegal importation of puppies forms a central part of the new UK legislation which will replace the current, much harder to amend, EU legislation. This is a crucial opportunity to rewrite the rules, to prevent illegal importers from threatening the health and welfare of animals and the health of the British public in the future. Finally, we offer robust and achievable recommendations to Government which we urge them to act upon.

It's been four years since we first highlighted the plight of puppies being forced to travel in despicable conditions. How many more have to suffer before these simple solutions are put into place?



Paula Boyden BVetMed MRCVS
Veterinary Director

EXECUTIVE SUMMARY

As the UK's departure from the EU approaches, the UK Government has an opportunity to review the rules on the importation of dogs (and cats), which is currently regulated by EU legislation. Dogs Trust wanted to present further evidence to Government to demonstrate the urgent need for meaningful legislative change to help deter illegal importers of puppies.

This investigation, our fourth in as many years, saw the team return to Hungary. Since the changes to the Pet Travel Scheme in 2012, puppies from Hungary have made up a significant proportion of the puppies quarantined in Great Britain (GB) after being seized at the border for not being compliant with the importation rules. Data from the Dogs Trust Puppy Pilot Scheme shows that since its launch in December 2015 to the end of July 2018, 30% of all puppies intercepted at the GB border originated in Hungary. The Puppy Pilot takes puppies that are seized and abandoned at the ports through their time in quarantine and onto Dogs Trust's network of rehoming centres to be responsibly rehomed. By funding the care of the puppies, the Pilot empowers the relevant enforcement agencies to focus their resources on seizures.

In 2014 our investigators found widespread abuse of the Pet Travel Scheme in Hungary, with breeders and vets willing to break the law and supply underage puppies to GB. If anything, the trade in 2018 appears even more established. **With little effort at all, our investigators were able to purchase passports for underage and even absent puppies with fraudulent vaccination records.**

The potential scale of the trade was also staggering, **with one dealer claiming that a transport company exported around 400 puppies a week from a number of breeders in his town to Spain.** This equates to some 20,000 puppies a year, providing an annual turnover for the breeders in the town of up to £28 million (based on an average sale price of £1,400 per puppy for French Bulldogs, Dachshunds and Pugs in Sweden, UK, France and Germany. Source: EU Dog & Cat Alliance Members).

For the first time, this investigation explored a potential new trade route into GB for smugglers after discussions with enforcement agencies suggested that puppies bred in Serbia - an unlisted Third Country where there are supposed to be more stringent rules before dogs can enter the UK - were being brought into the EU to be sold to unsuspecting members of the public. We wanted to provide evidence that this was indeed happening, and what we found truly shocked us.

Puppies from unlisted Third Countries need to follow additional rules for travel within the EU. This may be because they have less robust veterinary or administrative systems, higher rabies incidence; or because they have never applied to be a listed Third Country. If the additional rules were followed properly a puppy would be at least seven months old before it could travel to the EU. To get around the rules, **we discovered vets in Serbia providing much younger puppies with pre-filled Hungarian and Bulgarian passports and microchips, passing them off as EU-bred animals.**

This year we also wanted to explore in more depth the network of the illegal puppy trade, looking at the journey to GB but also the extent of the trade in GB itself.

We carried out extensive desk research of online advertisements to establish just where these puppies are being sold and what proportion of the GB puppy market they represent. The puppy-buying public is often unaware of the origins of their pet until its microchip is scanned on a routine trip to the vet, kick-starting a sometimes long, emotional and costly chain of events from entering quarantine to potential vet treatment and behavioural issues.

Finally, we made a series of Freedom of Information requests to Local Authorities to get a clearer idea of how the trade in illegally imported puppies has penetrated GB, looking at reports of suspected cases and actual prosecutions.

Through both the desk research and Freedom of Information requests, we discovered that virtually no part of Great Britain is unaffected by the illegal puppy trade.

KEY RECOMMENDATIONS TO END PUPPY SMUGGLING

The UK must introduce revised legislation to effectively regulate pet travel and commercial pet movements as an urgent priority post EU Exit. This should include:

- Reintroducing a requirement for a rabies blood (titre) test before entry into the UK, together with a wait period post-vaccination which is in line with the incubation period of rabies
- Reintroducing a requirement for dogs and cats to be treated against ticks before entering the UK
- The window for tapeworm treatment of dogs before entry into the UK must be shortened from 24-120 hours to 24-48 hours and tapeworm treatment for cats should be reintroduced
- Increase maximum penalties for those caught illegally importing dogs, together with the introduction of punitive Fixed Penalty Notices
- The focus on enforcement of the pet travel legislation must be shifted from carriers (i.e. the ferry companies and Eurotunnel) to Government agencies and visual checks of all dogs entering the country need to be undertaken

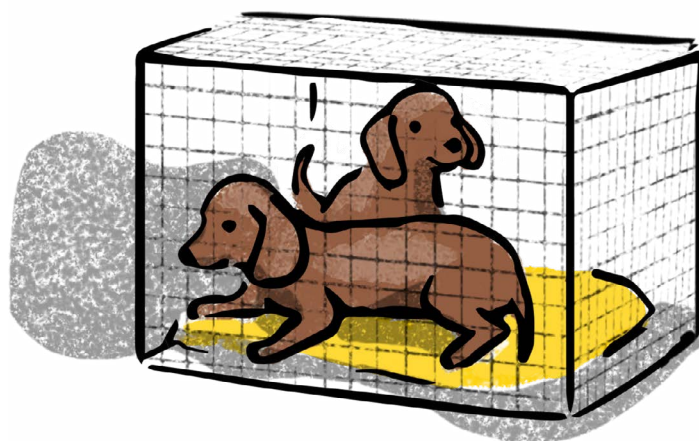
INVESTIGATION METHODOLOGY

Field investigation methodology (Hungary and Serbia):

- Set up a fake dealership and website to engage directly with potential dealers, vets and transporters from Hungary and Serbia
- Posed as buyers of puppies to make contact in Hungary and Serbia with breeders that could supply us with puppies on a regular basis
- Located potential dealers by scouring internet adverts on a number of Hungarian and Serbian websites just prior to the arrival of our investigative team
- Specifically looked for adverts that had multiple entries for different breeds of dogs
- When calls were made to relevant Hungarian advertisements, we asked as to whether the dealer had sold puppies to the UK before and whether they knew the regulations for issuing passports for the puppies. We did not ask specifically for underage puppies but asked when we could get the puppies to the UK. Not all the dealers were familiar with the system and we did not encourage them to do anything that they would not usually do
- When calls were made to relevant Serbian adverts we asked how young the puppy could be in order to take it into an EU Member State

Desk research methodology (Great Britain):

- Selected 10 regions where large volumes of repeat sellers have been recorded (source: Hindsight) – Cambridgeshire, London, Norfolk, Nottingham, Middlesbrough, Manchester, Birmingham, Edinburgh, Swansea and Kent
- Using two of the largest online classified advertising websites we identified potentially suspect adverts for further investigation
- Looked at adverts for the four main breeds seized by border officials through the Dogs Trust Puppy Pilot, namely English Bulldogs, French Bulldogs, Pugs and Dachshunds
- Filtered the adverts further to target puppies aged three to five months and costing between £500 and £1,500 - the typical profile of an imported puppy sold online
- Once the adverts had been identified, we called the seller to find out more information and in particular if the puppy had been imported



THE EVIDENCE SO FAR

In the four years since our first investigation we have provided the Government with in-depth evidence of the abuse of the Pet Travel Scheme.

2018

- Identified five breeders in Hungary who told us they could obtain passports for puppies that were younger than the required three months and that the dates of birth could be changed by their vet
- Obtained four passports from two different vets in Hungary where the dates of birth had been changed to make the puppies older than they were. In two cases 11 week old puppies were made to appear 16 weeks of age. The GB border checks are document and identity checks, not visual. Even if the puppies were viewed, staff do not have the relevant training to estimate the age of puppies
- Discovered that in addition to changing the dates on the pet passports, the passports contained false information about the rabies vaccination and the *Echinococcus multilocularis* (tapeworm) treatment. The rabies vaccination was backdated by at least three weeks, meaning if a vaccination was actually administered it would be invalid. The date for the tapeworm treatment was a date in the future
- Met and filmed several Hungarian breeders - who stated that they have exported young puppies to the UK - including one large scale breeder who claimed 400 puppies a week were exported out of Hungary to Spain from breeders in his town
- Met with a Serbian vet who sold our investigators two Bulgarian passports and microchips
- Identified a Serbian breeder who offered to sell our investigators 10 week old puppies. If they paid extra they could get Hungarian passports for the puppies which would be pre-filled with all required vaccination stickers and vet signatures - the breeder would simply fill in the details of the puppy such as its breed and date of birth
- Met a large scale Serbian breeder who claimed to be an international dog show judge, and claimed to be able to get Bulgarian passports for puppies and transport these puppies to Hungary
- Filmed seven breeders who could arrange EU passports for Serbian puppies
- In the UK, identified that 21 out of 176 adverts (almost 12%) on online classified websites meeting our criteria (French Bulldog, English Bulldog, Pug or Dachshund between the ages of 3 and 5 months and costing between £500 and £1,500) were for puppies imported into the UK. Over 30% of adverts on one particular site were for puppies with EU passports
- Freedom of Information requests revealed that 1,358 records of reports to Local Authorities about suspected illegally imported puppies had been made between 2013 and 2018
- Freedom of Information requests to Local Authorities found that in the last year 53 puppies were seized and 39 quarantined on suspicion that they were in breach of the Rabies Order 1974
- Freedom of Information requests revealed that 13 prosecutions have been taken forward by the Local Authorities in relation to illegally imported puppies since the pet travel rules changed in 2012

2017

- Tracked a consignment of puppies from its source in Lithuania all the way across Europe, through the border and into GB
- Successfully brought a child's toy dog with a fake passport through the GB border on a licensed transport vehicle without anyone noticing it was not a real dog
- Filmed breeders in Lithuania and Poland willing to sell us underage puppies
- Filmed a vet in Lithuania selling us sedatives for puppies to allow them to be smuggled through the British border undetected
- Filmed vets in Poland and Lithuania willing to falsify passports to say a puppy was older than it was
- Purchased pet passports with false birth dates and vaccination/worming records
- Recorded transporters willing to carry underage pups into GB and advising our investigators that shipments of puppies should be small so as not to arouse suspicion
- Identified GB sellers offering imported Lithuanian puppies for sale which had travelled via the non-commercial Pet Travel Scheme

2015

- Successfully brought a child's toy dog into GB without a visual check at the borders on three out of four attempts. The unsuccessful attempt was due to failure of the microchip, rather than visual checks
- Filmed three breeders in Lithuania, all of whom sold us puppies (which were rehomed responsibly) under 12 weeks of age and arranged for passports to be issued via their own vet contacts
- Obtained eight passports from seven vets in Lithuania who falsified data on the passports to enable puppies under the age of 15 weeks to travel to GB
- Filmed seven vets in Romania, two of whom stated that they could falsify passport information for us (including one for a nine week old puppy)
- Filmed five breeders in Romania who had sold puppies to GB in the past, all of whom claimed they could arrange fake passports for underage dogs
- Contacted one further breeder in Romania by phone who said he could arrange passports for eight week old puppies
- Visited nine sellers/breeders from Lithuania, Hungary and the Czech Republic selling puppies (via advertisement on GB classified websites) that had recently come over from Eastern Europe under PETS to be sold in GB

2014

- Filmed 15 breeders/dealers who had sold underage puppies ranging from 7-12 weeks to GB
- Filmed four vets from Lithuania and two vets from Hungary who admitted falsifying pet passports
- Purchased pet passports with false birth dates and all vaccinations including rabies from a vet for 'fictitious puppies'
- Filmed breeder and dealer explaining how easy it is to bring illegal Pit Bull Terriers into GB
- Purchased a puppy (which we rehomed responsibly) from an online advert in GB that had been bought into the country from Lithuania at just 10 weeks old without a rabies vaccination
- Purchased two puppies (which we rehomed responsibly) in Hungary from a breeder who provided passports with falsified date of births and fake rabies vaccination details



NEW TRENDS

Pregnant bitches - a significant concern in the past year has been the pregnant bitches that have been seized at the border, three to date, and the implications this has moving forward. Although it is illegal to transport a pregnant bitch in the last 10% of her pregnancy, should she get through the border it will be possible for the dealer to sell the puppies with mum present, looking to all intents and purposes like they have been bred in a home environment in GB.

Sedation of puppies – as awareness surrounding the trade in underage puppies has grown both in the UK and in the source countries of Central and Eastern Europe, our work has uncovered a worrying move by the illegal importers to try to circumvent border controls altogether with the sedation of puppies. In our 2017 investigation we filmed a vet selling our investigators sedatives for a puppy in order to bring it through the GB border undeclared and other vets suggesting that this was the best way to get a puppy through the border undetected. Early in 2018 a litter of puppies was discovered sedated and hidden within a vehicle at the GB border (see page 25).

Third Countries and fraudulent EU pet passports - as we have seen in our investigation this year, countless numbers of puppies from unlisted Third Countries are being provided with EU passports, largely from Bulgaria and Romania, and brought into EU Member States for sale. Here they essentially become 'EU-bred dogs' and are free to be sold on throughout the EU, their original country of birth long forgotten.

Large breed dogs - to date, the seizures made at the ports have been dominated by small fashionable breeds such as French Bulldogs, Dachshunds and Pugs. However, there is also a growing trend for larger breeds, some of which, it is suspected, are being imported as fighting dogs. In the past year, 13 American Bulldogs and 27 Cane Corsos, many with their tails docked and ears cropped, have been intercepted at the border.



KEY FINDINGS AND CASE STUDIES

SERBIA

In our previous investigations we concentrated our fieldwork in Central and Eastern Europe where, from the evidence from seizures at the ports, we knew large quantities of puppies were being bred destined for sale in GB. More recently we had reports from enforcement agencies of puppies being bred further afield, outside of the EU, which were then being illegally imported into the EU for onward sale. We were aware, through discussions with enforcement agencies, of some cases of underage Serbian puppies which had been illegally landed in Great Britain.

Case one: a three and a half month old pup was advertised for sale on social media. The advert clearly stated that the puppy was from Serbia. Although the puppy had a valid Hungarian microchip and passport, the Hungarian authorities admitted that they knew it had been imported to Hungary from another country but did not know where from. The puppy was seized and quarantined in GB.

Case two: two puppies (aged 4 months and 6/7 months) travelling under the commercial Balai Directive (which provides a framework of rules for trade between EU Member States in live animals and also imports from Third Countries) were flagged on a random post-import check. They had been brought into GB by a Romanian rescue organisation but when scanned were found to have Serbian microchips. The younger of the two puppies was quarantined.

Given our more stringent rules (see box opposite) for importing dogs from Serbia due to their less robust vet systems, we wanted to establish the reality of this trade and to investigate the nature and scale of it.

During the investigation, we met eight breeders/dealers from Serbia. Some of the breeders were full scale commercial breeders whilst others were smaller breeders with one or two breeding bitches.

We found that it was staggeringly easy to obtain Serbian puppies with EU passports. All large scale commercial breeders and all bar one of the small-scale breeders included in the investigation offered to obtain EU passports (Bulgarian, Romanian, Czech Republic, Hungarian) for puppies. Some online advertisements in Serbia openly stated that EU documents could be obtained for Serbian puppies.

The majority of breeders we met had exported puppies out of Serbia with EU passports to Western European countries such as Germany, Austria, Sweden, France, and Norway. Although none had previously directly exported puppies to GB from Serbia they were happy to do so.

SUMMARY OF FINDINGS

- Met with a Serbian vet (who had been recommended by a breeder) who sold our investigators two Bulgarian passports for €35 (£31) and also microchips without even seeing the puppies
- Filmed a breeder who offered to sell our investigators 10 week old puppies. For an additional payment they could get Hungarian passports for the puppies which would be pre-filled with the vaccination and vet signatures - the breeder would simply fill in the details of the puppy such as its breed and date of birth
- Met a large scale breeder who claimed to be an international dog show judge, who claimed to be able to get Bulgarian passports for puppies and transport these puppies to Hungary
- Filmed seven breeders who could provide EU passports for Serbian bred puppies
- Two vets suggested that we could hide the puppies whilst going through the Serbian border to Hungary and once in Hungary obtain an EU passport where the pup could then travel onto GB

THIRD COUNTRY RULES

Countries outside of the EU are classified as Third Countries; within this definition, varying degrees of co-operation exist, depending on the issue and the level of convergence between the Third Country's legislation and enforcement agencies and that of the EU and its Member States.

In general, a country's legislation and system are categorised against the EU's from closest to least convergence, as follows: EU Member State; listed Third Countries; and unlisted Third Countries. For the purposes of the pet travel system in the EU, the following stipulations apply, each requiring varying (and increasing) movement controls:

- EU Member States
- Listed Third Countries: European Economic Area (EEA) countries (e.g. Lichtenstein, Norway, Switzerland) or countries which the EU considers do not present a higher risk of disease incursion compared with movements within the EU, such as Australia; or where there is convincing evidence that they have effective systems in place to report, control and manage rabies, such as the USA
- Unlisted Third Countries: countries which have not been accepted for listed status, because of less robust veterinary or administrative systems, higher rabies incidence; or because they have never applied (this includes Serbia)

While Serbia is negotiating for EU membership (with an aim of achieving accession by 2025), and enjoys close geographic proximity to several EU Member States, in animal transportation and pet travel terms it is considered an unlisted Third Country (due to inadequate methods to treat the prevalence of diseases which pose a danger to animal and human health).

For a puppy from an unlisted Third Country, such as Serbia, to comply with the EU's pet travel rules, the following additional steps need to be adhered to:

- A puppy needs to be vaccinated against rabies not before the age of 12 weeks in order for the vaccination to be valid
- A blood titration test then needs to be carried out at least 30 days after the vaccination date
- Finally, the rabies blood (titre) test must be carried out not less than three months before the date of travel to an EU country i.e. a three month wait between the date of the successful blood test and the date of travel

A puppy will therefore be at least seven months of age before it can legally travel from an unlisted Third Country to an EU country.

One potential loophole we had considered was that Article 11 of EU regulation No 576/2013 allows EU Member States to accept companion animals from listed Third Countries without valid treatment for rabies, if certain strict criteria are met. Hungary does not allow for such a derogation (in fact, at present, only four EU Member States do allow for such a derogation) so it is not the case that puppies from Serbia are legally entering the EU in this way.



PUPPY SMUGGLING

Case Study 1

Our investigators met a breeder at his home address where he has a professional set up with breeding kennels and around 45 dogs. He breeds Pugs and Yorkshire Terriers.

The breeder told the investigators that he could supply puppies on a regular basis as he breeds dogs commercially. He explained he would only sell puppies aged at least 15 weeks that have had the necessary vaccinations.

At the initial meeting he offered to sell the investigators Pugs for €350 (£315) per puppy complete with an EU pet passport; he also offered to arrange transport to Budapest.

The breeder explained that he can obtain Romanian and Bulgarian pet passports but that Bulgarian passports were easier to obtain. The breeder claimed to have sold puppies with EU passports in the past and has never experienced problems at the Serbian-Hungarian border.

Whilst explaining the details to be recorded in the passport, the breeder showed the investigators a pen that can be used to fill in the names of owners on the passport. It is not possible to erase the ink with a finger; but if heated with a lighter the ink disappears, enabling a person to overwrite the information - essentially enabling the passport-holder to alter the information of ownership and details of the puppies at will.

Case study 2

Our investigators met a vet recommended by one of the Serbian breeders at his clinic. The vet asked what pet passports were required: he offered to provide either Hungarian or Bulgarian passports.

Later that evening, the vet phoned and told our investigators to call him in the morning to arrange a mutually convenient time and place to meet. They arranged to meet at a service station.

The following morning, the vet arrived at the service station with two Bulgarian pet passports which had all the necessary stickers and stamps for vaccinations. The dates had been left blank and he explained to our investigators how to fill the information correctly. They paid around €35 (£31) for each passport, which included a stamp and signature from a Bulgarian veterinary practice.

In addition, the vet provided a declaration form stating that the puppies originated from Bulgaria and had not entered Serbian territory. This declaration, he said, is sometimes required when crossing the Serbian-Hungarian border.

The passports and declaration were given to our investigators without the vet ever having seen the puppies.

The vet provided contact details for a Serbian vet with a practice in Munich, Germany, who, our investigators were told, would be able to help them with registering the microchips on a German microchip database. The vet gave our investigators Serbian microchips for the breeder or the investigators to insert into the puppies themselves.

Case study 3

Our investigators identified a breeder openly advertising 10 week old puppies for sale with EU pet passports (puppies should be at least 7 months to enter the EU from an unlisted Third Country). The puppies would cost €350 and the passport would cost an additional €100.

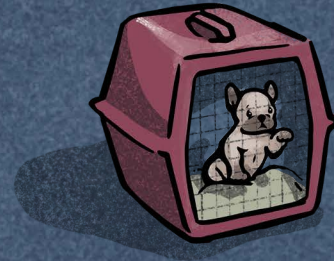
The investigators were shown two young puppies and a European pet passport issued in Hungary. The passport had all the necessary vaccinations and had been stamped by a vet from Hungary. The passport was left blank to be filled in with the details of the puppies and any other information that was required.

The breeder claimed that there were no problems taking puppies across the border from Serbia into Hungary; and any problems that were encountered could be resolved via a payment (presumably a bribe).

He claimed to regularly take puppies under the permitted age of seven months into EU Member States including Hungary, Germany, Austria, Sweden, France; and Third Countries, including Norway, Switzerland and Ukraine. He could guarantee delivery of the puppies our investigators were buying to Budapest on Hungarian passports; from there they would have to make their own arrangements to get the puppies to GB. If required a Hungarian vet would register the puppies onto the Hungarian database.

This breeder said he could provide various dog breeds including Yorkshire Terriers, Toy Terriers and French Bulldogs and could obtain as many passports as required. He said he had 20 years' experience selling puppies to a variety of countries.

TRADE ROUTES FROM NON-EU MEMBER (THIRD COUNTRY) SERBIA



IDENTIFIED
7 SERBIAN BREEDERS
WILLING TO PROVIDE
UNDERAGE PUPPIES
WITH FALSIFIED
EU PASSPORTS

AVERAGE PRICES PAID FOR FRENCH BULLDOGS IN...



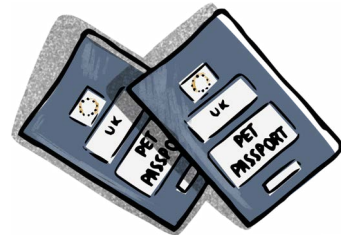
 Serbia
£316

 Germany
£1,300

 France
£1,300

 Sweden
£1,870

 UK
£1,570



SERBIAN PUPPIES AS YOUNG AS
10 WEEKS* BEING GIVEN
HUNGARIAN/BULGARIAN/CZECH
PASSPORTS PRE-FILLED WITH
FALSE VACCINATION DETAILS
AND VET DETAILS



*PUPPIES SHOULD BE AT LEAST
7 MONTHS OF AGE BEFORE THEY
CAN LEGALLY TRAVEL TO AN
EU MEMBER STATE FROM
A UNLISTED THIRD COUNTRY

KEY FINDINGS AND CASE STUDIES

HUNGARY

Our first investigation back in 2014 unveiled widespread, organised abuse of the Pet Travel Scheme in Hungary with breeders and vets willing to falsify passport and vaccination information in order to transport underage puppies to GB to be sold.

We decided to revisit the country to see if increased publicity and awareness of the issue of the illegal importation of puppies had had an impact on the trade. We hoped we might find an improved situation this time around, but sadly very little had changed and, if anything, the trade is more firmly established.

SUMMARY OF FINDINGS

- Identified five breeders familiar with PETS who openly told us they could obtain passports for puppies younger than the required three months and the dates of birth could be changed by their vet
- We were issued with four pet passports from two different vets. The actual dates of birth had been changed to make the puppies older, for example 11 week old puppies were recorded as being 16 weeks old
- In addition to changing the dates on the pet passports, the passports contained false information about the rabies vaccination and the *Echinococcus multilocularis* tapeworm treatment. The date for the rabies vaccination was backdated by at least three weeks, meaning if a vaccination was actually administered it would be invalid. The date for the tapeworm treatment was a date in the future
- In other cases rabies vaccinations were given to seven and eight week old puppies – which again would mean that the vaccination would be invalid
- A number of the vets had given health checks dated in advance – demonstrating again the fraudulent activity. We also filmed a vet explaining the correct procedure and how he could get around it
- Our investigators also met breeders who stated that they have exported young puppies to the UK
- One large scale breeder who claimed 400 puppies a week were exported out of Hungary to Spain from breeders in his town

"PASSPORTS CONTAINED FALSE INFORMATION ABOUT THE RABIES VACCINATION AND THE ECHINOCOCCUS MULTILOCCULARIS TAPEWORM TREATMENT"



Case study 1

Our investigators visited a breeder with two 11 week old French Bulldog puppies for sale. She told them her vet could issue the passports to enable us to take these puppies to the UK the following week. She explained she has been selling puppies for 16 years, including to the UK.

The breeder also gave our investigators contact details for a driver who apparently travels to the UK regularly with puppies. He has a van kitted out with cages and specifically takes puppies/pets from Hungary to the UK.

The investigators said they were interested in buying the puppies and sent the breeder their details so that passports could be written. They paid 30,000 Hungarian forint (£80) for two pet passports.

When the investigators picked up the passports the vet had falsified the ages of the puppies and included false information on the rabies vaccination and *Echinococcus multilocularis* (tapeworm) treatment.

The pet passports stated the rabies vaccination was administered on 11th July 2018 and that the tapeworm treatment was given on 13th July 2018. Since we picked up the passports on 9th July 2018 the information is clearly false.

In their passports these 11 week old puppies were recorded as being 115 days old (16 weeks and 3 days). The breeder even forged our investigator's signature for the passports.

Case study 2

Our investigators met with a breeder selling French Bulldog puppies which were eight weeks old. They were also offered some West Highland Terriers that the breeder's neighbour had for sale which were seven weeks old. In total, the breeders had 11 puppies they were keen for our investigators to buy.

The investigators were told the pet passports for these puppies could be obtained the following day. The breeder works with a vet who was happy to alter the dates of birth and could get all the necessary vaccinations done for puppies to travel immediately to the UK. The breeder had arranged for puppies to travel to the UK in the past and has connections with a transporter. They claimed not to have had any issues at the border in the past.

The investigators agreed to buy the seven week old West Highland Terrier and eight week old French Bulldog and paid 14,000 Hungarian forint (£38) for two pet passports, which they collected from the breeder later the same day (5th July 2018).

The pet passports fraudulently stated that the puppies were 92 days old, (13 weeks and 1 day) with a birthdate of 4th April 2018. The rabies vaccination was dated as given on the 5th July 2018 (the date our investigators collected them). Technically, these puppies should have remained in Hungary for another three weeks before they would legally be able to travel, but the dealer suggested it would be fine to take them to the UK straight away. In reality, however, the puppies are unlikely to have passed border checks since the rabies vaccination was not backdated, showing it to be invalid.



NETWORKS TO & THROUGH THE UK

Since launching the Puppy Pilot scheme in 2015 we have been collating statistics relating to border seizures and puppies quarantined each month, however we have always believed that many thousands more are slipping through the net and making their way into GB.

Given that very few imported puppies are advertised as such, it is likely that many members of the public are buying these animals without being aware of their source unless picked up through a microchip scan at a vet practice. Huge numbers of illegally imported puppies are simply disappearing undetected into British homes.

We wanted to identify just how much of an impact the illegal importation of puppies might be having. We therefore carried out a period of desk research of online classified adverts and made a series of Freedom of Information requests of the Local Authorities and Trading Standards.

DESK RESEARCH

- We selected 10 locations where large volumes of repeat sellers have been recorded (source: Hindsight) – Cambridgeshire, London, Norfolk, Nottingham, Middlesbrough, Manchester, Birmingham, Edinburgh, Swansea and Kent
- Using two of the largest online classified advertising websites we identified potentially suspect adverts for further investigation
- We looked at adverts for the four main breeds seized by border officials through the Dogs Trust Puppy Pilot, namely English Bulldogs, French Bulldogs, Pugs and Dachshunds
- We filtered the adverts further to target puppies aged three to five months and costing between £500 and £1,500 - the typical profile of an imported puppy sold online
- Once the adverts were identified, we called the seller to find out more information, in particular if the puppy had been imported

We discovered only two of the adverts that met our criteria mentioned that the puppy or puppies had been bred abroad; this information was not volunteered in subsequent follow up telephone conversations with sellers that did not declare the origin of the puppies. It was only when our researcher specifically asked the question about where the puppy was from that the information was reluctantly given. This often related to a further question about seeing the puppy with its mother, something that can't be done for many illegally imported puppies, although we are aware that fake mums are now being used in some cases to circumvent this advice.

In total our researcher identified that 21 out of 176 adverts meeting the criteria were for puppies imported to GB from Central and Eastern Europe, almost 12%. Given that the two classified advertising websites we looked at carried around 350,000 adverts for dogs in a year to the end of July 2018, it is possible to say that as many as 42,000 of these could be for imported puppies.

The picture was starker still when looking at the individual websites. Whilst one of the websites we looked at had just one advert for a puppy with an EU passport out of 111 relevant adverts, the other website had 20 adverts for puppies with EU passports out of 65 relevant adverts, almost 31%.

Whilst not all of these puppies will have been 'smuggled' in the traditional sense, many will have been underage when they received their vaccinations and others by the very fact that they have travelled on pet passports rather than under the commercial Balai Directive will have entered GB illegally. Of the 21 puppies identified, nine were stated as being 3 months old, one as 3.5 months old, nine as 4 months old and two as five months old.

"HUGE NUMBERS OF ILLEGALLY IMPORTED PUPPIES ARE SIMPLY DISAPPEARING UNDETECTED INTO BRITISH HOMES"



FREEDOM OF INFORMATION REQUESTS

In June 2018 we made several Freedom of Information requests to all 418 Local Authorities across the UK to try to get a clearer understanding of the impact the trade is having throughout the UK. Currently, official advice for members of the public who suspect illegally imported puppies is to report it to their local Trading Standards or Citizens Advice Consumer Helpline. Trading Standards tend to sit within the Local Authority.

We asked Local Authorities:

1. In the last five years, how many reports have you received, either from the general public or anyone else, in relation to the suspected illegal importation of puppies? Please provide the figures for each year.
2. Please confirm how many of these reports have been investigated further. Please provide the figures for each year.

Out of 431 requests sent, we received 301 responses. The responses revealed:

- 1,358 records of reports to Local Authorities about suspected illegal imported puppies between 2013 and 2018
- 303 (22%) of these were from members of the general public, with most reports being made by vets
- 945 (70%) of these were followed up or referred onwards
- Kent County Council had the highest number of reports between 2013 & 2018 with 204 in total. Lincolnshire was second, with a total of 143

We were not surprised to learn that such a low percentage of the reports received were from members of the public; there is little information available to the public about who to contact if they suspect a puppy has been illegally imported as well as a lack of clarity about the process involved.

Through our further investigations, we understand that the majority of reports are made by vets who generally see puppies early on when owners take them for vaccinations and check-ups. Scanning for a microchip is often when puppies are identified as imports as the microchip is likely to be a foreign one.

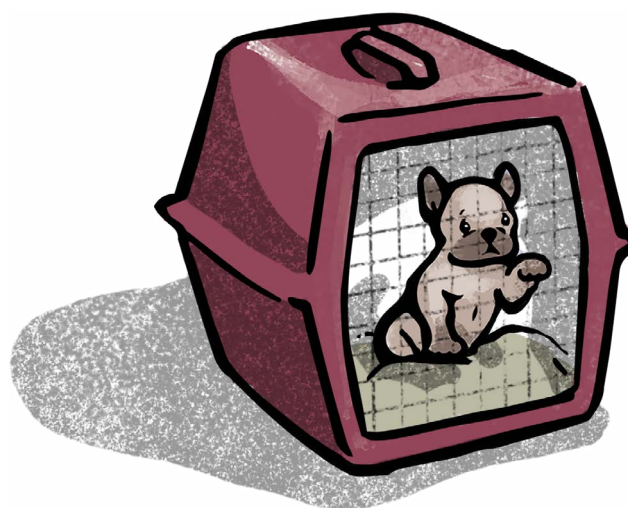
To show even more clearly the penetration of illegal activity in the UK, we also asked Local Authorities how many puppies had been seized on suspicion of being an illegal import and how many prosecutions had carried out relating to illegally imported puppies.

Specifically we asked:

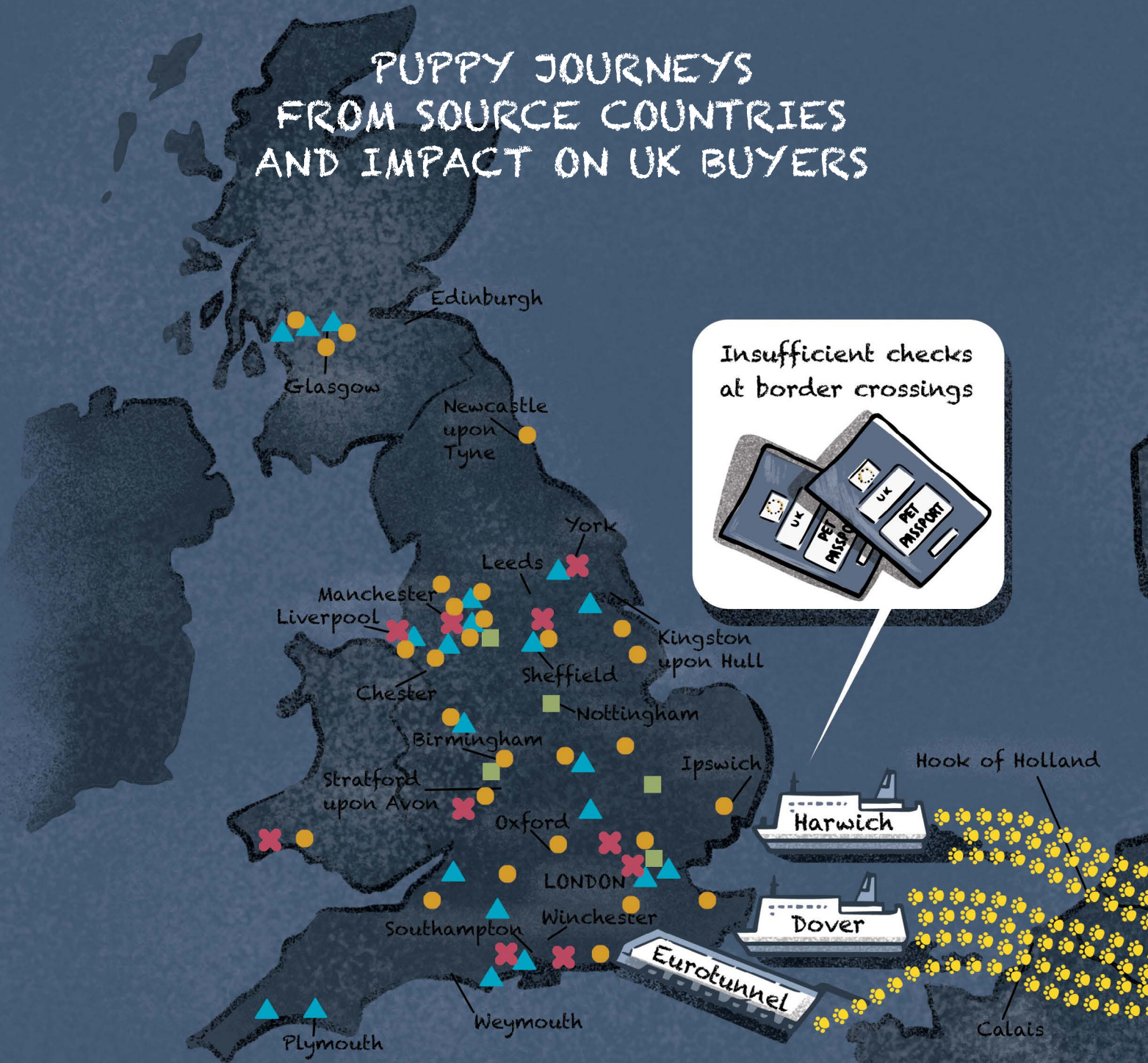
1. Between 1st May 2017 and 30th April 2018 a) how many puppies were seized by Trading Standards on suspicion that they were in breach of the Rabies Order 1974; and b) how many of these puppies were subsequently quarantined?
1. For each calendar year from 2012 up to 30th April 2018, how many prosecutions has the Local Authority carried out in relation to illegally imported puppies under either a) the Rabies Order 1974 or b) The Non-Commercial Movement of Pet Animals Order 2011)?

We received 364 responses from the 418 Local Authorities approached. The responses revealed:

- In the last year 53 puppies were seized on suspicion that they were in breach of the Rabies Order 1974
- In the last year 39 puppies were quarantined on suspicion that they were in breach of the Rabies Order 1974
- 13 prosecutions have been undertaken by the Local Authorities in relation to illegally imported puppies since pet travel rules changed in 2012



PUPPY JOURNEYS FROM SOURCE COUNTRIES AND IMPACT ON UK BUYERS



Insufficient checks at border crossings



-  Location of puppies taken into quarantine
-  Location of adverts for puppies with illegal passports
-  Location of reports of suspected illegal activity to Local Authorities
-  Prosecution locations

No exercise and
no toilet breaks



Insufficient
food and
water



* Addition of 7 hours to conservatively take into account pick ups, comfort breaks for passengers and waiting time at the port.

WHY DOES THE TRADE EXIST?

The UK's pet travel rules were harmonised with the rest of the EU in 2012. This meant it became possible to legally import puppies into the UK at 15 weeks of age, compared to the previous minimum age of approximately 10 months.

Government figures show the number of dogs entering GB under the Pet Travel Scheme (PETS) increased by 61% in the first year after the pet travel rules were relaxed. This figure has continued to increase year on year. Between 2011 and 2013 the number of dogs entering GB from Lithuania increased by 780%; and from Hungary a 663% increase.

In December 2014, updated EU legislation introduced a new minimum age of 12 weeks before a puppy could be vaccinated against rabies, new passports with laminated strips, a requirement for further contact details for the vets and a requirement for owners to travel within five days of their pet (or authorise a named person to do so). Subsequent Dogs Trust investigations confirmed that these changes have failed to make any impact on the illegal puppy trade.

Certain 'designer' breeds such as French Bulldogs, Dachshunds and English Bulldogs can fetch huge prices in the UK and demand for them has increased significantly in recent years. Combine this scenario with a limited supply of puppies from reputable breeders within the UK and it is clear breeders in Central and Eastern Europe have filled the demand gap in this lucrative market. A French Bulldog puppy, for example, can sell for over £1,500 in the UK whereas in Hungary, Lithuania and Poland it would fetch nearer to £600 (Source: EU Dog & Cat Alliance Members 2017).

Given that the chances of getting caught are very low and the penalties for doing so are woefully small, it is unsurprising that people are tempted to get involved.

Supply of puppies, however, does not need to meet demand and it will be vital moving forward to address the challenge of buyer behaviour and the consumers' need for instant gratification, as well as legislation if we are to truly stop the illegal importation of puppies.

WHAT HAS THE UK GOVERNMENT DONE SO FAR?

Following each of our investigations we have provided the Government with detailed recommendations and actions that should be taken to put an end to the illegal importation of puppies. Last year we continued to engage with the Department for Environment Food & Rural Affairs (Defra), Animal and Plant Health Agency (APHA) and the carriers (including the ferry companies and Eurotunnel) at numerous stakeholder meetings and welcomed the launch of a central intelligence unit to process the evidence of illegal importation. And yet, despite all of the evidence, Government has still not implemented any effective change.

In recent weeks, Defra has confirmed its intention to introduce a ban on third party sales of puppies in England. Whilst this is welcome news and should cease imports via the commercial route under the Balai Directive, we are concerned the ban alone will not be sufficiently robust to tackle the illegal importation of puppies. As we have proved, importers are largely using the non-commercial Pet Travel Scheme to bring puppies into the country rather than the commercial Balai route and so are already freely breaking the law. They are also constantly evolving their tactics to evade getting caught. For example, recent trends (see page 5 for more information) have included importers adapting to bring in just two or three puppies per vehicle, rather than the five per person that they had previously carried, in order not to arouse suspicion, as well as importing pregnant bitches.

Through our work on the Puppy Pilot Scheme, we have experienced first-hand how the unscrupulous criminals involved in illegal puppy importation remain unfazed by the inadequate penalties currently available under the pet travel legislation. It is therefore crucial this legislation is also reviewed if the illegal trade is to be effectively addressed.



**"MOVING FORWARD TO
ADDRESS THE CHALLENGE
OF BUYER BEHAVIOUR AND
THE CONSUMERS' NEED FOR
INSTANT GRATIFICATION"**





BREXIT OPPORTUNITIES, CHALLENGES AND RECOMMENDATIONS

Currently, EU legislation regulates various areas of relevance to dog and cat health and welfare in the UK. This includes non-commercial pet travel, commercial pet movements and the welfare of animals during transport. This EU legislation is incorporated into UK law by various statutory orders and regulations. Whilst the existing legislation goes some way to protecting dog and cat health and welfare, it could go much further. In some areas, the UK is also restricted from having more stringent animal health requirements than required by this EU legislation.

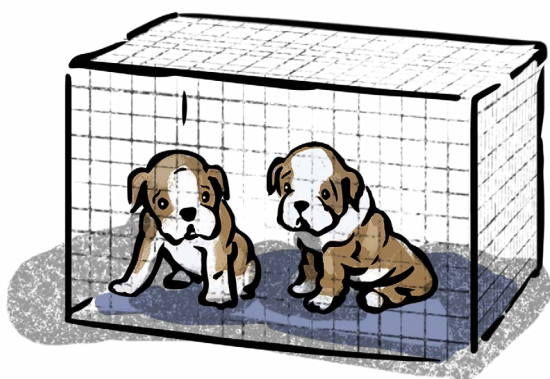
BREXIT OPPORTUNITIES

When the EU legislation on pet travel was first introduced, the UK was allowed a derogation which meant that dogs entering the country were required in addition to standard rules of pet travel to have a rabies blood (titre) test and to be treated against ticks before entry. However, the PETS rules were changed in 2012 to harmonise pet travel across Europe. This resulted in a relaxation of the UK's animal health controls and meant that as dogs travelling from EU Member States were no longer required to have a rabies blood (titre) test and to then wait six months before travel, puppies as young as 15 weeks of age could obtain pet passports and travel to the UK. The previous minimum age for entry was approximately 10 months.

The decision to exit the EU provides the Government with a crucial opportunity to review and amend the legislation governing pet travel, trade and disease control. This includes the possibility of reintroducing important animal health requirements that are not currently permitted under EU legislation. Post EU Exit we urge the Government to:

- Reintroduce a requirement for a rabies blood (titre) test before entry into the UK, together with a wait period in line with the incubation period of rabies
- Reintroduce a requirement for dogs and cats to be treated against ticks before entering the UK
- Shorten the tapeworm treatment window for dogs before entry into the UK from 120 hours to 48 hours as previously required. Reintroduce a requirement for cats to be treated against tapeworm
- Reduce the number of dogs allowed under non-commercial movement rules

"THE DECISION TO EXIT THE EU PROVIDES THE GOVERNMENT WITH A CRUCIAL OPPORTUNITY TO REVIEW AND AMEND THE PET TRAVEL LEGISLATION"



EU LEGISLATION

Regulation (EU) No 576/2013

Regulation (EU) No 576/2013 regulates pet travel and is more commonly known as the Pet Travel Scheme or PETS. This regulation allows dogs to travel to the UK from EU Member States without being subjected to quarantine restrictions provided they:

- have been microchipped
- have been vaccinated against rabies (at no less than 12 weeks old)
- have a valid pet passport issued by an authorised veterinarian
- have been treated against the tapeworm *Echinococcus multilocularis*

This regulation applies to any movement which does not have as its aim either the sale of or the transfer of ownership of a pet animal.

This legislation also states that non-commercial movement of pet animals that complies with the animal health requirements included within the regulation must not be prohibited, restricted or impeded by EU Member States on animal health grounds.

Council Directive 92/65/EEC

Council Directive 92/65/EEC, also known as the Balai Directive, imposes additional requirements for the commercial movement of animals, semen, ova and embryos. The Balai Directive requires:

- animals being moved commercially must come from a holding or business registered in the EU country of origin
- importers must obtain a health certificate (issued from the European Commission's TRACES website) for each movement of animals
- an authorised veterinarian must carry out a clinical examination of each animal ensuring they are fit to travel, within 48 hours before travel.

In addition to commercial movements, this Directive applies whenever five or more dogs are being transported at the same time or when animals are being moved for rehoming purposes (i.e. where ownership is changed).

Council Regulation (EC) No 1/2005

The transport of dogs and cats in the EU in connection with an economic activity is governed by Council Regulation (EC) No 1/2005 which regulates the welfare of animals during transport. This legislation requires that animals are fit to travel. In particular:

- dogs and cats of less than eight weeks cannot be transported unless they are accompanied by their mother
- they must not be transported in a way likely to cause them injury or undue suffering
- pregnant females for whom 90% or more of the expected gestation period has already passed, or females who have given birth in the previous week, must not be transported
- new-born mammals in which the navel has not completely healed, must not be transported

This regulation does not apply to the transport of animals which does not take place in connection with an economic activity and to the transport of animals directly to or from veterinary practices or clinics, under the advice of a veterinarian.

There are very few specific requirements for dogs and cats under this legislation. The European Commission previously committed to adopting more detailed rules for the transport of dogs and cats. However, despite a European Food Safety Authority opinion being published on this in 2004, there are still only a few rules specific to dogs and cats.

PUPPY SMUGGLING

BREXIT CHALLENGES

With the animal welfare opportunities of EU Exit also come some considerable challenges. The Department for Environment, Food & Rural Affairs (Defra) is responsible for animal health and welfare and is one of the Government departments most affected by EU Exit.

Defra has been organising preparations for EU Exit around a range of different scenarios, including exit without a deal in March 2019, and a negotiated exit with an implementation period lasting until the end of 2020. In September 2018, a report by the National Audit Office on Defra's progress in implementing EU Exit¹ concluded that Defra faces an enormous challenge and has an unprecedented portfolio of work that it needs to deliver for EU Exit. In a no deal scenario, there is a high risk that Defra will be unable to deliver all the legislation it needs to in time.

TRACES

At present, the UK has access to the EU's Trade Control and Expert System (TRACES). This is a web-based veterinary certification tool used by the EU for managing the import and export of live animals and animal products within its borders. TRACES sends an electronic message from the departure point to the transfer point and the arrival point, enabling consignments to be tracked. Rejected consignments and the reason for their rejection are placed on file.

Defra is working to the assumption that the UK will not have access to TRACES for animal imports into the UK after EU Exit and so is currently developing its own service and IT system to manage the import of consignments from non-EU countries and live animals from the EU.

Ireland

Post-Brexit the UK will have a land border with an EU Member State, via Northern Ireland's border with the Republic of Ireland - itself a major source of farmed puppies subsequently smuggled into GB, particularly via Cairnryan and Holyhead (as highlighted by Operation Delphin). Operation Delphin is a collaboration bringing together enforcement agencies and animal welfare organisations to investigate the illegal movement of puppies between Ireland and the UK. The intelligence-led operation has resulted in many successes, including one raid in which almost 100 puppies were seized from one shipment). The current lack of border checks between the Republic of Ireland and the UK makes it virtually impossible to prove whether a dog originated from the Republic or Northern Ireland.

From a biosecurity point of view, it is vital that an 'all Ireland' approach is taken in the decision-making process. It will also be imperative that improved checks are introduced at GB ports for entry from Ireland (including Cairnryan, Holyhead and Fishguard).

Any new legislation should take this into account to ensure that such routes do not become even more lucrative for the puppy trade. In addition, from a disease perspective, we also need to treat the island of Ireland as a single entity as disease does not recognise nor respect national borders.



No deal Brexit

In September 2018, the Government published its technical notice on pet travel in the event of no deal being agreed ahead of the UK's exit from the EU. Whilst a range of scenarios were explored, we were concerned that the technical notice did not identify the opportunity to overhaul the current pet travel laws to better protect the health and welfare of our country's dogs, despite our ongoing work to highlight the trade and our recommendations on how best to tackle it.

¹ <https://www.nao.org.uk/wp-content/uploads/2018/09/Defra-Progress-Implementing-EU-Exit.pdf>

ROLE OF THE EU

The EU has a significant role to play in helping to end the trade in puppy smuggling, given the continent-wide nature of the problem. Through our four undercover investigations, we have evidenced the ongoing issue of puppies being illegally imported into the UK from EU Member States including Lithuania, Hungary, Romania and Poland. This year we also provide evidence of an extremely concerning trade in underage puppies from Serbia (an unlisted Third Country) into EU Member States such as Austria, France, Germany and Sweden - typically using procured Bulgarian, Hungarian or Czech Republic passports.

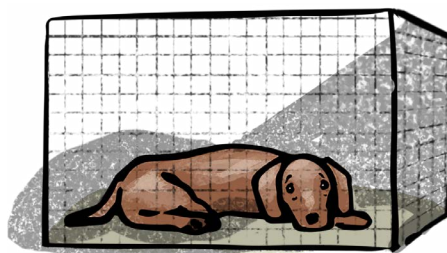
A new EU Animal Health Law (Regulation (EU) 2016/429) was adopted in March 2016 and aims to better protect animal health across the EU. It streamlines almost 40 EU legal acts related to animal health into a single law. Intended as a framework law, the regulation itself only lays down general principles and basic rules on animal diseases and detailed provisions are still to be established by further legislation (delegated or implementing acts).

From an illegal importation perspective, this is an important new regulation as it will repeal both the EU Pet Travel Scheme (PETS) and the Balai Directive. Whilst the Animal Health Law will apply from 2021, the current pet travel rules will continue to apply until 21st April 2026. This means that the more detailed provisions for pet travel have yet to be confirmed.

Ensuring that the Animal Health Law, and the delegated and implementing acts under it, are as robust as possible is still in the UK's interest in order to protect our biosecurity. With plenty of evidence showing that the illegal puppy trade flourishes because of demand across the EU, cooperation between the UK and various EU border agencies and customs officials must continue post EU Exit. Dogs Trust recommends:

- EU legislation requiring the compulsory permanent identification and registration of dogs on national databases linked to an EU database. The new EU Animal Health Law provides framework legislation under which this could be introduced
- The EU should draw up an action plan to tackle illegal companion animal movement across Europe, involving key stakeholders including the European Commission, European Parliament, Member States and relevant Third Countries, including enforcement agencies and border and veterinary authorities

**"THE EU HAS A
SIGNIFICANT ROLE TO
PLAY IN HELPING TO
END THE ILLEGAL TRADE
IN PUPPIES, GIVEN THE
CONTINENT-WIDE NATURE
OF THE PROBLEM"**



IMPACT ON UK PUBLIC

As a nation of dog lovers we know the lengths that people will go to in order to get their perfect pet. Yet, how many people perusing the classified adverts on a website will truly know the journey the puppies being advertised may have endured? From bad breeding practices in puppy farms in Central and Eastern Europe, through 1,000-plus mile journeys in backs of vans, to invalid or zero vaccinations against disease.

These factors are producing a ticking time bomb for the future health and welfare of dogs in this country – and potentially that of their owners, too.

DISEASE RISK

Between 2011 and 2017 there has been an incredible 236% increase in the number of declared dogs coming into Great Britain each year via PETS from 85,299 in 2011 to 287,016 in 2017. Whilst a proportion of these will belong to families taking advantage of the changes to the travel rules in 2012 and the ease with which pets can now travel, the dramatic explosion in numbers suggests that a significant proportion are likely being brought in for sale. This has worrying implications not just for puppies' welfare and for the control of disease, but also for the breeding dogs in source countries which are being bred from intensively.

Our four investigations to date have revealed extensive evidence of pet passports issued with false vaccination dates, false birth dates and even passports issued for puppies the vet had never actually seen.

Whilst we acknowledge the risk of rabies entering the UK is very low, we have very serious concerns about the tapeworm *Echinococcus multilocularis*. We question whether an individual prepared to falsify rabies vaccinations would bother with tapeworm treatment or measures to prevent other diseases. Indeed, our investigation this year identified one breeder who had falsified both the rabies and *Echinococcus* information on the pet passport.

A surveillance study of ticks infesting domestic dogs across the UK highlights the importance of appropriate treatment against ticks for dogs travelling outside of the UK. It found that 77% of dogs which had travelled were carrying attached ticks. The importance of tick treatment is also highlighted by the cluster of cases of Canine Babesiosis which were reported in Harlow and Romford in 2016, as well as more recently in Hertfordshire in 2017. It is further highlighted by the importation from Portugal of a *Hyalomma lusitanicum* tick into the UK in 2016, a type of tick which can carry and transfer Crimean-Congo haemorrhagic fever (CCHF) virus to humans. Whilst the UK used to be able to require that dogs entering the country had tick treatment, this hasn't been the case since the 2012 pet travel changes.

The following diseases whilst of more concern in relation to the importation of adult dogs are not without risk with the illegal puppy trade.

Echinococcus multilocularis

Not currently found in the UK, this tapeworm can easily infect dogs. Although it has little impact on dogs it can cause potentially fatal conditions in humans. EU law states dogs must be wormed (using praziquantal) between one and five days prior to their return to the UK.

Babesiosis

Transmitted by ticks, this disease is found in Southern and Central Europe. It damages and destroys red blood cells, causing anaemia, lethargy, enlarged spleen and jaundice. Without treatment, this disease can be fatal to dogs. Under EU law there is no requirement for tick treatment.

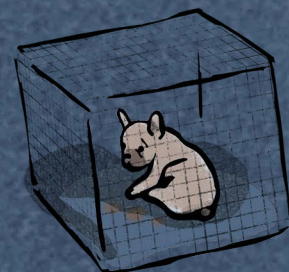
Ehrlichiosis

Transmitted by ticks, this disease is reasonably common in Southern Europe. It acts by infecting the white blood cells and reduces the number of platelets. Signs include enlarged spleen, and nose bleeds and pinpoint skin bleeds are a result of low platelets. Infection can lead to chronic debility, bleeding disorders and neurological disease in dogs. As above, under EU law there is no requirement for tick treatment.

Leishmaniasis

This infectious disease is transmitted by sandflies and is prevalent in coastal areas on the Mediterranean. A significant number of infected dogs develop skin lesions and suffer hair loss. If left untreated the disease is fatal, with renal failure the most common cause of death, however symptoms can take years to develop. Leishmaniasis is zoonotic, meaning it is also a health risk to humans. The sandfly that transmits this disease is not present in the UK. Under EU law there is no requirement for preventative measures against Leishmaniasis.

PUPPY PILOT STATS (DEC 2015 TO JULY 2018)



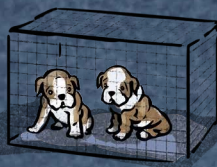
1,433 puppies intercepted
on their way into Great Britain -
60% deemed illegal and quarantined

40 puppies died before rehoming
Impacted by poor breeding, illness,
conditions of travel and malnutrition

3 pregnant bitches seized
5 of the 14 pups delivered died at birth

The average age of puppies being
brought illegally into the UK is approximately
8 weeks, when they should
legally be a minimum of 15 weeks

65% of intercepted puppies come from
Hungary, Poland and Lithuania



Designer breeds French Bulldogs, Dachshunds,
English Bulldogs and Pugs make up
63% of all puppies intercepted at the border

It costs Dogs Trust an average of
£846 to quarantine and treat
each puppy on the Puppy Pilot



IMPACT ON UNSUSPECTING UK FAMILIES

Financial costs of quarantine fees

Unexpected vet bills

Emotional cost to the family

PUPPY SMUGGLING

SOCIALISATION AND HABITUATION ISSUES

It is well established that what puppies experience in their first weeks can have lasting effects on their behaviour. The quality and frequency of experiences for puppies during these early weeks will have a major impact on their lifelong quality of life. Both social (including other dogs, people and other animals) and non-social (including scents, sounds, objects and different environments) experiences are important and should be introduced carefully to ensure every puppy finds each new experience positive. If this narrow window of opportunity is missed, or if the puppy has a traumatic negative emotional experience, the likelihood increases that a puppy will suffer lifelong behavioural consequences.

At the end of 2015 Dogs Trust set up the Puppy Pilot to take unwanted puppies seized at British ports through their time in quarantine and onto its rehoming centres where puppies are rehomed responsibly. Puppies receive daily socialization, using an evidence-based approach with experienced staff throughout this time. The extra resources that Dogs Trust puts in to the care of the Puppy Pilot puppies ensures that they are given the best possible start in life.

We suspect, however, that the puppies Dogs Trust cares for via the Puppy Pilot are just the tip of the iceberg. Many more puppies that have been illegally imported into GB slip through the net each year and are sold through online classified adverts to unsuspecting members of the public.

HEALTH PROBLEMS

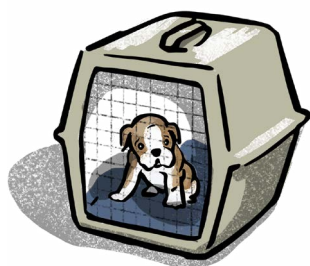
A worrying proportion of the puppies that come to Dogs Trust through the Puppy Pilot also have health issues, as the effects of poor breeding, lack of veterinary care, malnutrition and horrific journeys to GB take their toll. Very sadly some 5% of the puppies seized to date under the Puppy Pilot died as a result of these factors.

In the last few years, demand in the UK for French Bulldogs, English Bulldogs, Pugs and Dachshunds has sky-rocketed. Supply from reputable UK breeders, despite growing, has not been able to keep up with demand. Kennel Club breed registrations for 2017 show French Bulldogs are now the UK's most popular breed at 30,887, with Pugs at 10,783, Bulldogs at 9,540 and Miniature Smooth-Haired Dachshunds at 5,735. These breeds now make up some 63% of the puppies intercepted at the GB border.

Between 1st December 2015 and 31st December 2017, 22% of English Bulldog puppies on the Puppy Pilot required eye surgery, most notably for a painful condition known commonly as 'Cherry Eye'. During the same period nearly 12% of the puppies had surgery to correct breathing problems associated with poor facial conformation, and 10% had skin problems such as dermatitis, which are often associated with an animal's genetics.

These surgeries and treatments are often an unexpected expense for owners yet without them a dog may suffer lifelong pain and discomfort or reduced quality of life.

**"WE SUSPECT THAT THE PUPPIES
THAT DOGS TRUST CARES FOR VIA
THE PUPPY PILOT ARE JUST THE
TIP OF THE ICEBERG"**

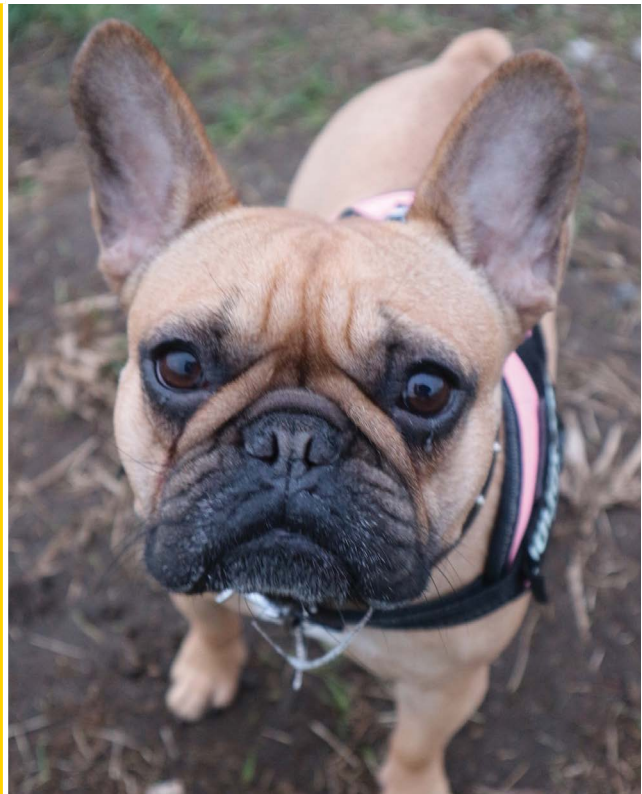


Case Study - Pregnant bitch

Lola, a heavily pregnant bitch, was imported into GB having been transported thousands of miles from Lithuania and was seized under welfare conditions as it is illegal to travel a pregnant bitch in the last 10% of the gestation period. The temperature in the back of the van she was in was around 40 degrees centigrade.

Lola was aged at around two years old and was in poor condition. It was suspected that she had had a least one previous litter (it is not recommended that a bitch has a litter of puppies before the age of 12 months and should subsequently have no more than one litter per year and no more than four in her lifetime). Lola gave birth to four puppies during a distressing experience. Two of Lola's puppies were stillborn.

Lola has experienced a number of health issues including *Campylobacter* (a bacterial infection in the gut) and bilateral hip dysplasia, an abnormal formation of the hip socket that can cause crippling lameness and arthritis of the joints. She does not currently need surgery for this but may do so in the future. Lola also had a degree of Brachycephalic Obstructive Airway Syndrome (respiratory disease associated with the brachycephalic – flat-faced - conformation of certain breeds) and her breathing was badly impaired. She underwent corrective surgery to help with her breathing. Lola has now been rehomed successfully.



Case Study - Fake mum

In one seizure, ten French Bulldog puppies aged approximately three to four weeks of age were discovered heavily sedated in a car travelling from Poland. The pups were found hidden in the hollow of the back seat under a pile of blankets and under one of the front seats.

The adult female French Bulldog (which had a pet passport) was suspected of being their mum but the assessing vet doubted this as she had no milk. There were signs that she had had at least one previous litter so the suspicion was that she was being brought across to act as a fake mum since buyers increasingly ask to see the pups with their mum.

The smugglers saw the pups as a disposable commodity and so did not pay the necessary quarantine fees to get them back. However, they desperately wanted the adult female back, presumably for future breeding. Nine of the puppies survived their ordeal despite some health issues and have been responsibly rehomed by Dogs Trust but sadly one died.



CONCLUSION AND RECOMMENDATIONS

This report makes clear that the abuse of the Pet Travel Scheme continues virtually unabated with underage puppies from Central and Eastern Europe being brought to GB in their thousands for sale to a largely unsuspecting public.

Our latest investigation has shown vets are continuing to falsify birth dates and vaccination information on passports and that, if anything, the trade is growing.

This year we also provide evidence of an extremely concerning trade in underage puppies from Serbia into EU Member States. Serbia is an unlisted Third Country where there are more stringent rules before dogs can enter the EU.

We have also shown in much more detail the impact the trade is having on the public and Local Authorities in the UK, and the scale of the problem in communities the length and breadth of the country.

We have set out the short term and long term health and welfare impact on the puppies themselves, and the financial and emotional cost to their owners.

The recommendations we have repeatedly and consistently made since our first investigation in 2014 have remained largely ignored. With Brexit fast approaching, now is the best opportunity we have to tackle this serious problem head on.

We believe the UK Government must introduce revised legislation to effectively regulate pet travel and commercial pet movements as an urgent priority post EU Exit. Our recommendations (outlined opposite) include actions that could be taken immediately by the Government, as well as actions that are currently prevented by EU legislation.



ACTION FOR UK GOVERNMENT - URGENT REQUIREMENTS:

- Reintroduce a requirement for a rabies blood (titre) test before entry into the UK, together with a wait period, in line with the incubation period of rabies
- Reintroduce a requirement for dogs and cats to be treated against ticks before entering the UK
- Shorten the tapeworm treatment window for dogs before entry into the UK from 24-120 hours to 24-48 hours as previously required. Reintroduce a requirement for cats to be treated against tapeworm
- Reduce the number of dogs allowed under non-commercial movement rules
- The focus on enforcement of the pet travel legislation must be shifted from carriers (i.e. ferry companies and Eurotunnel) to Government agencies. This should include a requirement for there to be sufficient out-of-hours and weekend cover at ports by Government agencies
- Require visual checks of all dogs entering the country. Physical checks should also be a requirement where necessary, e.g. if a puppy is suspected of being underage or not matching the information in its pet passport
- Create a centrally accessible database logging pets' microchip numbers and date of entry into the UK
- Increase maximum penalties for those caught illegally importing dogs and introduce punitive Fixed Penalty Notices
- Introduce specific regulatory requirements to ensure the welfare of dogs during transport. This area is currently regulated by EU legislation, with very few requirements to protect the welfare of dogs during transport

ACTION FOR THE UK GOVERNMENT - WORK IN PROGRESS:

- More effective intelligence-led enforcement is needed to identify dealers and traders that regularly import multiple puppies at a time. A central intelligence unit has been set up by Government, but more action needs to be taken on the intelligence shared
- Increased cooperation with veterinary regulatory authorities in the countries that import puppies into the UK, to crack down on vets supplying fake passports. The UK's Chief Veterinary Officer has previously written to veterinary counterparts in Central and Eastern European countries, but more work is needed in this area
- Further workshop-based training especially for Trading Standards Officers, and Local Authority personnel across the country. Dogs Trust has already been involved in supporting such training, and is willing to facilitate further training where needed. Trading Standards must provide more awareness about their role in the process

ACTION FOR THE EU:

- EU legislation requiring the compulsory permanent identification and registration of dogs on national databases linked to an EU database. The new EU Animal Health Law provides framework legislation under which this could be introduced.
- The EU should draw up an action plan to tackle illegal companion animal movement across Europe, involving key stakeholders including the European Commission, European Parliament, Member States and relevant Third Countries, including enforcement agencies and border and veterinary authorities



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Dogs Trust

Dogs Trust is the UK's largest dog welfare charity caring for around 15,000 dogs at its network of 20 rehoming centres throughout the UK and one in Ireland. We will never put a healthy dog to sleep. Our mission is to bring about the day when all dogs can enjoy a happy life, free from the threat of unnecessary destruction. Dogs Trust is a registered charity in England [227523], Scotland [SC037843] and Ireland [CHY16218].

Tracks Investigations

Tracks Investigations is an ethical investigation agency supporting the work of conservation and animal protection NGOs and charities worldwide.

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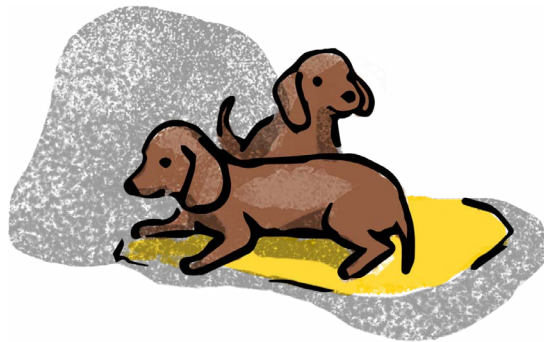
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