



Import of Puppies

The concerns around importation of puppies is not a new issue. In 2014 following an extensive investigation into imports by one of our members, Dogs Trust, CFSG wrote to the then Minister outlining the following position on movement of puppies into the UK:

“Given that puppies and kittens of a young age are a desirable commodity for buyers and older animals e.g. 6 months of age, are far less so, increasing the age at which animals could be imported would be an effective way of reducing the numbers of imported puppies and would make it less lucrative. CFSG considers that, as a minimum, the waiting time from vaccination to import should be twelve weeks which would effectively restrict import to puppies over 24 weeks old (vaccinate at twelve weeks plus twelve week wait). The justification for doing so is that twelve weeks is the longest reported incubation time for Rabies. Such action would make detection of illegal import far easier as well as improving biosecurity. As it stands, accurately ageing a puppy up to 15 weeks of age is difficult and therefore enforcement is a challenge. If the age of import was higher this would mean enforcement would be more feasible without needing a huge amount of additional expert resource.”

CFSG continued to push this position in the period up to 2020 when we have seen the issue around puppies imports rise in profile. May 2020 was the second highest month on record for Defra issuing commercial licences to import dogs, highlighting the surge in imported puppies and dogs that has occurred despite lockdown and the ban on third party sales which came into force on April 6 2020.

CFSG receives many reports of puppy imports from our members including those representing local authorities, welfare and veterinary groups. During lockdown, it is clear that many unscrupulous importers have taken full advantage of the recent increased demand at a time when border controls are particularly stretched. Dogs Trust research sets out that these puppies can travel between 23-33 hours from Central and Eastern Europe often with no food, insufficient water and no exercise or toilet breaks.

Puppy importers are very adept at masking their activity, avoiding detection at points of entry into the UK and changing their methodology to circumvent rules: The key examples we tend to give for this are:

- Age of puppies is increasing to make it harder to detect that they are under the legal minimum age (we used to see young puppies being seized but now the average is around 12-14 weeks so it is harder to tell if they are younger than 15 weeks)
- Smaller numbers of puppies being moved at a time to avoid suspicion (3-4 at a time rather than the maximum of 5 allowed under PETS)
- Sedated puppies to avoid detection altogether
- Heavily pregnant bitches, which then give birth to their pups in the UK
- Many puppies enter the country with multiple people who may ostensibly be their owners to circumvent PETS rules
- The person transporting the puppy may act only as an agent with the sale contract directly between the purchaser and breeder. Such techniques create a significant loophole in any regulation.

- Using surrogate bitches to avoid “where’s mum” question
- Using guises such as selling puppies from rented homes and offering fake guarantees. The “Petfished” campaign is working well to raise these issues amongst the public, and CFSG looks forward to helping promote its ongoing activity, but illegal traders are finding new ways to circumvent the messaging
- Moving their adverts for puppies from marketplace websites to Facebook sites to avoid detection
- Setting up exchange points at service stations close to the M20 and Coquelles to increase the numbers that can be transported in a short time period
- More recently, the switch to commercial imports during May 2020 would be another example of evolving tactics. (Cite WPQ 52515)

Dogs and cats can be transported under the commercial and non-commercial rules over 15 weeks old. Many puppies being imported are under that age and they are either not checked or, if they are, it is difficult to establish if they are under 15 weeks old. With that in mind, once the UK leaves the EU’s regulatory ambit on December 31 2020, CFSG is asking the Government to raise the age for importing dogs and cats under the commercial and non-commercial rules to six months to bring it in line with its proposals on sales of dogs and cats. As the age of dogs is easier to identify at six months than 15 weeks this would improve enforcement and ensure that the illegal trade in puppies was ended whilst still allowing the non-commercial transport of dogs to shows and on holiday.

There is a strong human and health reason to support this proposal. The risk of imported dogs introducing non-endemic disease into the UK remains. In particular increased movement without adequate control measures could allow disease such as the tapeworm *Echinococcus multilocularis* (potentially fatal if contracted by humans) or Rabies into the UK. Improving import requirements to reduce the time window for tapeworm treatment and ensuring a twelve week wait following vaccination at twelve weeks of age and a blood test to ensure efficacy three weeks later would also delay import to 27 weeks of age and again align with current legislation on third party sales.

There is also a welfare case to support this around the number of inherently stressful events associated with importation during key periods of puppies’ development including:

- 1 Potential for abrupt/early separation of puppies from their mothers and littermates which interrupts the natural process of weaning and may inflict acute and/or chronic stress¹ and can result in a lack of proper socialisation/habituation which has life-long adverse effects on temperament and behaviour
- 2 Likelihood of multiple journeys especially for those puppies who are imported from Eastern Europe² e.g. from breeder to place of sale to buyer. Studies which have measured the impact of transportation on dog welfare have shown that transportation is stressful³ and multiple factors are likely to contribute to this stress including duration of travel, handling, containment, ventilation, temperature, driving style, access to food and water and opportunities for exercise
- 3 Introduction and mixing of young and unfamiliar animals which may pose a disease risk either when in close confinement during transportation or in the premises of those sellers who also breed their own dogs within England. As puppies are typically fully vaccinated at 10-12 weeks, they are highly likely to be unprotected against diseases including canine parvovirus and distemper virus when they enter England.

¹Serpell, J., Duffy, D.L., Jagoe, A., 2016. Becoming a dog: Early experience and the development of behavior. In Serpell, J., (ed) *The Domestic Dog. Its evolution, behavior and interactions with people.* Cambridge University Press. London.

² Dogs Trust, 2017. [Puppy Smuggling. A tragedy ignored. Investigation into the continuing abuse of the Pet Travel scheme and the illegal entry of dogs into Great Britain.](#)

³Mariti, C., Ricci, E., Mengoli, M., Zilocchi, M., Sighieri, C., & Gazzano, A. (2012). Survey of travel-related problems in dogs. *The Veterinary Record*, 170 (21), 542. <http://doi.org/10.1136/vr.100199>

CFSG has twice presented to the Animal Health and Welfare Board for England on this issue, most recently in July 2020, and will continue to push for the Government to raise the age to six months for importing dogs and cats and welcomes the recent petition seeking a debate on this matter. We have written to the Minister again in July 2020 and are speaking to the civil servant team responsible for companion animals.

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