

Sold a pup?

Exposing the breeding, trade and sale of puppies



Summary

The annual market for puppies in the UK is unknown but estimates vary between 700,000 and 1.9 million animals. This market is met by a variety of sources including puppies bred in the UK both by licensed and unlicensed breeders, which vary in scale from those producing one litter a year to those producing thousands of puppies a year. In addition, tens of thousands are imported from Ireland and other EU countries. Welfare problems are evident at every stage of the trade including the choice and husbandry of breeding stock, the breeding and rearing of the puppies, transport to the markets and the eventual sale of these animals. This can also result in poor health and increased susceptibility to fear or avoidance-related behaviour in the puppies and in the breeding stock. Animals can be left with severe and chronic health and behaviour problems. Some within the trade are also responsible for provision of poor-quality information to consumers, resulting in dissatisfied and sometimes distressed customers having to meet the cost and care of puppies with veterinary and behavioural issues and, in some cases, the euthanasia of an animal that has recently been acquired.



In the past three years the trade has been supplemented by increasing imports of puppies from continental Europe, which is believed to be driven by the demand that cannot be met within the UK for particular types or breeds of dog. There is suspected to be a large illegal trade, as well as the legal movement of puppies, from Ireland and continental Europe. As well as the impact on dog welfare and consumer satisfaction, the trade may also cost the UK Government millions of pounds in undeclared income, as the trade tends to be based on a cash economy.

The impulse and desire to buy a puppy, often of a certain breed, seems extremely strong for some prospective owners. This, coupled with the increasing continental trade, suggests that the traditional educational messages around responsible puppy acquisition, issued by animal welfare organisations and others to potential buyers, have undoubtedly failed. A new approach is therefore required based on: licensing any seller of puppies; improving and enforcing licensing regulations on breeders; driving up standards for imported puppies through better targeted enforcement, and driving out the unregulated dealers through enforcement of financial regulations. The Department for Environment, Food and Rural Affairs (Defra) has just launched a consultation and it is hoped this will lead to a change of the law in the next year. Only this can provide the greater security the consumer needs when buying a puppy and, most importantly, improve the health and welfare of breeding stock and puppies.

Introduction

It is estimated that the number of puppies required to meet the UK's national demand is huge, certainly in the hundreds of thousands of animals annually (see page 4) and is likely driven by a range of factors from the influence of fashion, family and friends, to replacing, or adding to, an existing dog.

This has created a market economy for puppies, usually focused on a number of popular breeds or increasingly so-called designer crossbreeds, sometimes dictated by the buyer's childhood experiences, family and friends. These trends can change over time due to fashions or fads. No-one knows exactly what the British puppy market looks like or how many puppies come into it each year, but the RSPCA estimates it could range from 700,000–1.9 million animals. What is clear is that there are a number of sources from which prospective owners can choose when buying their puppy, and these range enormously in terms of the quality of the puppy, the life it has led and the welfare problems it and its parents have already experienced, or could develop post sale. In many cases the consumer is being misled; believing they are buying responsibly, but ultimately buy an animal that has had a poor quality of life and welfare issues, which then cost more financially and emotionally.

While we have some understanding of the likely health and welfare problems faced by puppies as a result of the trade, to date there has been little information on where these animals are coming from, how they get to market and why prospective buyers continue to buy these animals and so perpetuate the trade. The RSPCA is the only organisation that has investigated the trade in its entirety, from the breeding of puppies through to the infiltration and successful prosecution of puppy dealers.

While there have been many reports on the international puppy trade, due to our unique involvement the RSPCA understands how the trade operates and the marketing tricks it uses to get people to buy puppies in the UK. This report lifts the lid on the puppy trade. It reveals the impact on the health and welfare of the puppies and breeding stock, why the market is so unregulated and what can be done to improve welfare. The Government in England is looking at wholesale reform of the puppy trade for the first time in more than 65 years. The information in this report will be invaluable in ensuring that the proposed radical changes to this unregulated market work.



The huge demand for puppies inevitably leads to large-scale breeding and imports of puppies.

What is the demand for puppies in the UK?

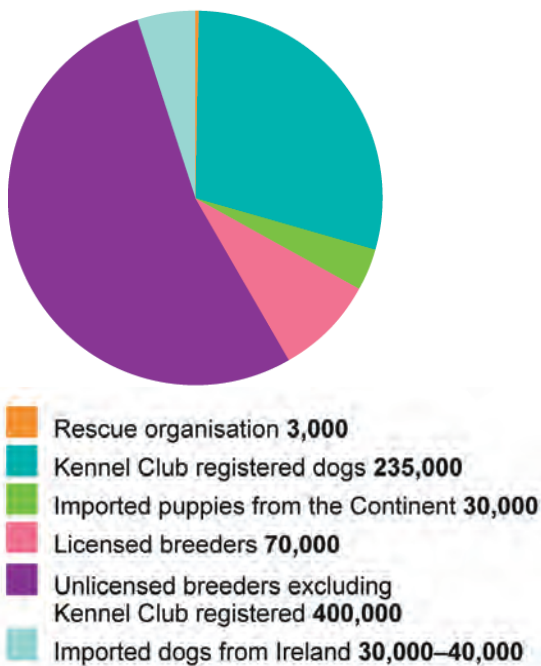
As it is not yet mandatory to identify and register a puppy, the number of puppies coming into the market is unknown – there are no accurate figures available about the puppy market in the UK. One poll showed that five percent of people surveyed had bought a puppy in the past twelve months which, if extrapolated to the general population, equates to nearly two million puppies coming onto the marketplace¹. In contrast, looking at the number of dogs needed to maintain the current dog population – estimated at 9.3 million dogs² with an average lifespan of 12³ years – just over 700,000 dogs would be needed annually to replace those that die. Defra estimated in 2012 that at least 560,000⁴ puppies are being born in England annually (which pro rata

on population would equate to around 700,000 puppies for the UK market). As some of these dogs would be replaced by adult dogs rather than puppies this is likely an underestimate.

What are the sources of puppies?

So where are these puppies coming from? The ideal situation would be to fill this market need with puppies from breeders in the UK who are breeding and rearing in conditions that meet the welfare needs of the puppies and their parents and for supply to equal demand. However, the reality is very different. Puppies come from a variety of sources both within and outside the UK (Figure 1). The welfare of the puppies and their parents varies widely as does the mortality both pre and post sale. We can definitely say that the supply of puppies is greater than the demand. Each of these six sources will be looked at in turn.

Figure 1: Estimated sources for puppies coming onto the market place in the UK every year



Sources:

Total puppies: 770,000. The top five rescue organisations rehomed around 30,000 dogs; it is estimated that the 250 other dog rehoming organisations in the UK account for a further 20,000 dogs but most will be adult dogs; it is estimated 3,000 are puppies.

Kennel Club in 2014 registered 235,000 dogs – they are thought to represent around one-third of the market (Dog Advisory Council 2012).

In 2015 the UK imported 10,000 dogs under commercial rules from four main puppy breeding countries and a further 12,000 under non-commercial rules – it is possible these are puppies for the trade; data on imports from Ireland were not recorded until 2014 and estimates of 30,000–50,000 are given.

Numbers from licensed breeders are estimated to be around 70,000⁵; numbers from unlicensed breeders include small-scale breeders producing less than four litters a year and any unlicensed large-scale commercial breeders are estimated to be around 400,000. It is not known how many puppies come onto the market from illegal imports. This figure shows 770,000 puppies coming onto the market but polling shows the actual number may be double this.

Unlicensed breeders

It is estimated that 70,000 puppies, representing around 10 percent of the puppies sold annually in Britain, are born to licensed breeders⁵. Taking into account the other sources of puppies, this could mean that half the puppies in the marketplace will originate from unlicensed British breeders. A proportion of these puppies will be registered with the Kennel Club under their Assured Breeder Scheme⁶. In 2013 over 31,000 puppies were bred under this scheme. It is thought that around 20 percent of puppies are obtained from neighbours or friends, who breed accidentally or to

supplement their income⁷. Little is known about the trends in these dogs. West Wales has traditionally been seen as the centre of the puppy breeding industry. In 2009 1,587 unlicensed breeders were identified by the Welsh Government, mostly in West Wales⁸. It is thought that 500 breeders were not under the scope of licensing in Wales following the introduction of the new Breeding of Dogs legislation in 2014.

The welfare of the breeding bitches and the puppies can be seriously compromised as Case study 1 shows.

¹TNS. 2015. Survey of the public on dog owning

²PDSA. 2015. Welbeing Report: www.pdsa.org.uk/get-involved/our-current-campaigns/pdsa-animal-wellbeing-report

³O'Neill DG, Church DB, McGreevy PD, Thomson PC, Brodbelt DC. (2013). Longevity and mortality of owned dogs in England. *The Veterinary Journal*. 198.638-643

⁴Defra. 2012. Microchipping of Dogs Impact Assessment: www.gov.uk/government/uploads/system/uploads/attachment_data/file/82470/dangerous-dogs-annexb-microchipping-ia-120423.pdf

⁵BDCH. 2015. Licensed dog breeding in Great Britain.

⁶Source: www.thekennelclub.org.uk/our-resources/kennel-club-campaigns/puppy-farming/

⁷APGAW. 2009. Pedigree dogs.

⁸Welsh Government. 2010/11. Companion animal welfare enhancement scheme <http://gov.wales/docs/dra/h/publications/110915cawesbaselineen.pdf>

Case study 1

In 2014 the RSPCA and Durham Police seized 55 dogs, including breeding bitches and puppies, from six addresses none of which was licensed to sell or breed puppies. This followed numerous complaints about puppies being sold out of cars in laybys for cash. The puppies seized include popular types such as Jack Russells, Chihuahuas and Jack Russell/Chihuahua crosses, sometimes known as 'Jackhuahuas'. This case resulted in successful convictions for animal welfare offences and the animals were successfully rehomed.

Kennel Club registered puppies

The Kennel Club registers between 235,000 and 250,000 puppies annually⁹. It is unclear what proportion of the market these puppies currently meet, but the Dog Advisory Council estimated that the Kennel Club was responsible for around 30 percent of puppies being sold annually¹⁰. The Kennel Club's 'Find a Puppy' site currently gets around six million hits a year (around 16,000 hits a day) a measurable increase on the four million hits annually in 2010¹¹. Although these hits are unlikely to be a true representation of all prospective buyers seeking to buy a puppy, and not all visitors will be looking to buy, the number of puppies registered with the Kennel Club is unlikely to be sufficient to meet the demand for the estimated 700,000 puppies needed per year.

The demand for KC registered puppies appears to be focused on certain breeds, which in turn is often dictated by childhood experiences, family and friends, and can change over time due to fashions or fads. For example, in the past decade, the demand for 'handbag' dogs such as French bulldogs, Pomeranians, shih-tzus and pugs has increased significantly. This has led to a large increase in numbers of Kennel Club registered puppies being born to some of these breeds: 10,087 pugs were registered in 2015, a five-fold increase in the past decade; 14,607 French bulldogs were registered in 2015, a 40-fold increase over the past 10 years. It is unclear if this demand for these specific breeds can be met from existing registered breeders within the UK, but what is clear is that the market has responded to these changing demands and other sources, such as imported puppies, now offer these breeds to the prospective buyer.

Imported puppies from the Continent and Ireland

Trade patterns have changed markedly in the past five years. Prior to 2012, Ireland was seen as the main exporting country for puppies to the UK. It had cheap land, gave subsidies to breeders and is close to the large UK market with little regulation on the intra-country trade. In 2012, the UK law on non-commercial trade in dogs was changed to make it simpler for dog owners to move their animals around Europe, for instance to dog shows or when they go on holiday¹². The RSPCA suspects this also provided an opportunity for puppy dealers to exploit this new trade opportunity and government data appears to support this. In 2012 declared imports of dogs from Hungary increased on the previous year by 450 percent, from Romania by 1,150 percent and from Lithuania by 507 percent. As Figures 2 and 3 show, the imports of dogs under commercial and non-commercial rules continued to see large increases in 2015. Imports of dogs from Romania and Lithuania rose by 7,700 percent and 852 percent respectively in the four years since 2011 in the non-commercial trade in dogs. Although data is not centrally collected, it is thought that commercial breeding establishments in all these countries took this opportunity to increase their market to the UK and this trade is assumed to be from certain countries, concentrated on puppies and those of certain breeds¹³. Increases in imports of puppies from these countries has also been seen in other major European markets such as Belgium¹⁴, Germany and Italy.



The puppy trade is concentrated on popular breeds such as Pomeranian and French bulldog.

⁹www.thekennelclub.org.uk/registration/breed-registration-statistics

¹⁰Dog Advisory Council. 2012. FAQs on dog breeding standards.

¹¹www.thekennelclub.org.uk/our-resources/media-centre/facts-and-figures

¹²The Non-Commercial Movement of Pet Animals (Amendment) Order 2014. No. 3158. www.legislation.gov.uk/ukxi/2014/3158/pdfs/ukxiem_20143158_en.pdf

¹³Daily Mirror 9.8.15. Agony of the designer puppies.

¹⁴Van Tilburg. 2015. The trade in puppies into Belgium. EU conference on cats and dogs.

Figure 2: Dogs imported into Great Britain under the Pet Travel Scheme (PETS) from four Central and Eastern European countries since joining the EU (2004–2015)

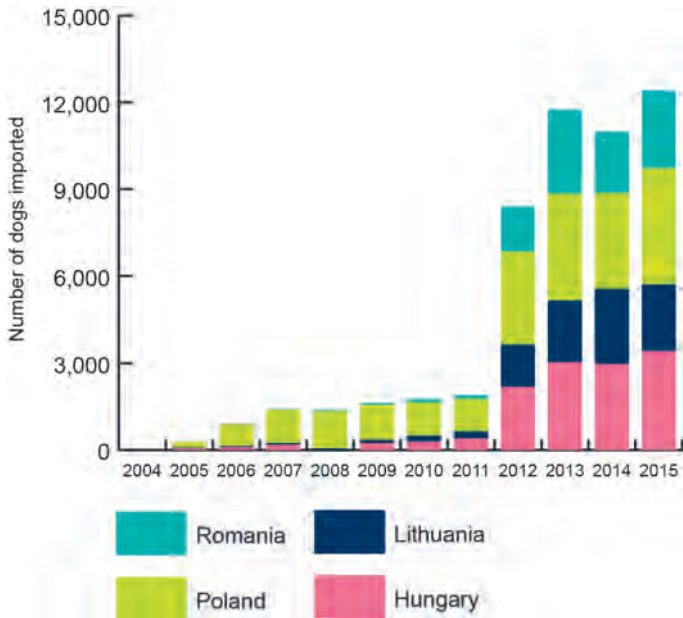
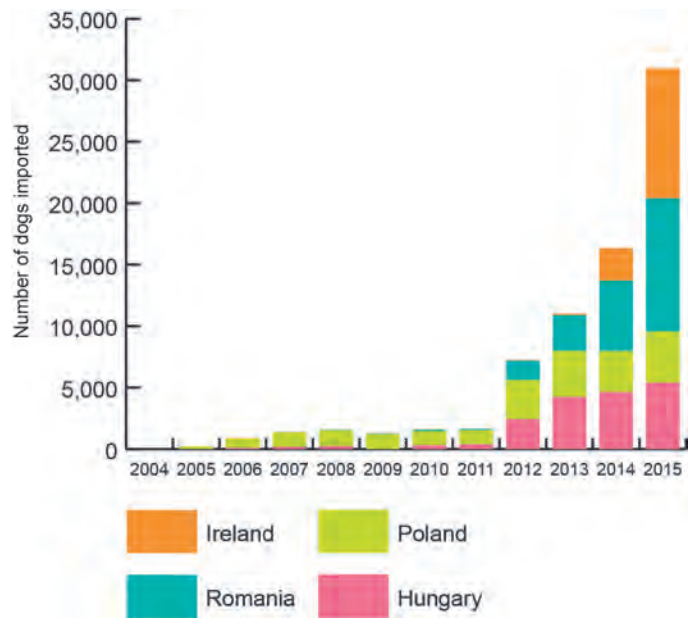


Figure 3: Dogs imported for commercial and non-commercial purposes from four countries into Great Britain (2004–15)



Source: Defra

Information on trends in puppies traded from Ireland are incomplete but it is estimated that between 30,000¹⁵–50,000¹⁶ puppies are bred annually in Ireland, the majority of which are thought to be exported to the UK. In 2010 the Dog Breeding Establishments Act started to regulate the commercial breeding of dogs in Ireland by licensing and setting conditions on dog breeding. In the past year a number of high-profile investigations and prosecutions against breeding establishments in Ireland, and government enforcement on the trade, have given a clearer picture of the trade from Ireland¹⁵. The Irish Government estimates 3,000 breeding bitches are kept in 73 commercial breeding premises in the country¹⁷. Enforcement has improved, including the closure of one large breeding farm¹⁸, but puppies continue to enter the UK from Ireland through the western ports of Stranraer, Fishguard, Holyhead and Heysham. Some of this puppy trade is illegal but actual numbers are unknown¹⁹ (Case study 2).

Case study 2

In June 2015 the RSPCA took into its care 16 puppies illegally imported into Pembroke by an Irish trader after Dyfed Powys Police discovered the puppies being illegally imported from Rosslare Harbour, Republic of Ireland. The puppies, mostly Labradors, were aged between nine and 16 weeks old and did not have the required documentation for compliance with rabies requirements. The puppies were quarantined and now all have been successfully rehomed.



Puppies confiscated at Dover after being illegally imported.

¹⁵M Sheahan. 2015. Dog breeding in Ireland. Presentation at EU cat and dog summit.

¹⁶Irish puppy breeders association as reported in *The Guardian* 3.2.10.

¹⁷*The Times* Irish news 1.2.16 www.thetimes.co.uk/tto/irishnews/article4679413.ece

¹⁸www.ispca.ie/rescue_cases/detail/ispca_gardai_and_local_authority_shut_down_puppy_farm_in_carlow

¹⁹RSPCA. 2015. Pushing at an open door – how the present UK controls on rabies are failing.

Commercial licensed breeders

Legislation on British commercial breeders differs according to the country (see page 14). In England and Scotland all commercial breeders with more than five breeding bitches require a licence, a figure recently changed to three breeding bitches in Wales²⁰ and now proposed in England²¹. In 2012 there were 895 licensed dog breeding establishments in Great Britain⁵ producing an estimated 67–70,000 puppies annually. More than half these breeders had 10 or fewer breeding bitches, but there were some large-scale commercial breeders, the largest having 200 breeding bitches⁵.

Wales has historically been the centre of large-scale commercial licensed breeders, as the following figures suggest. Carmarthenshire reported that in 2009 it licensed 83 places holding between 1,823 and 3,610 breeding bitches²². In 2010–11 251 licensed and 149 unlicensed dog breeding premises were identified in Wales, of which 82 percent were in the three counties of Pembrokeshire, Carmarthenshire and Ceredigion, areas known to be where large-scale commercial breeding is concentrated⁸. In 2015 Carmarthenshire reported licensing 81 breeders and Ceredigion reported licensing 41 breeders.

Rescue organisations

Rescue organisations rehome around 50,000 dogs but the majority are adult dogs. It is thought that rescue organisations rehome only a few thousand puppies annually.



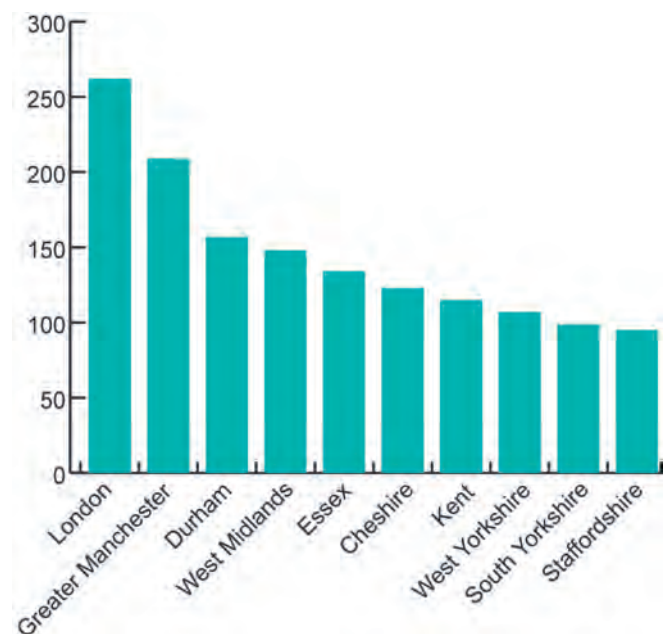
Pet shops

It is thought that only three to five percent of puppies are sold through commercial pet shops^{2, 7}, not surprising when only four percent of pet shops licensed by councils sell dogs²³. However, as it is illegal to sell a dog without a pet shop licence, there will be pet shop licence holders selling dogs without a pet shop. These are included above in the sections on commercial licensed breeders.

How do puppies get to market?

Trade routes are uncertain but it is known where puppies are being bred (West Wales⁸, East Anglia, Lincolnshire⁵) and from where they are imported (Figure 5). Puppies from Ireland come through Holyhead and Fishguard and some are also being traded through Northern Ireland to Scotland. Puppies from the Continent come through Dover and the Channel Tunnel. We also know, based on the number of calls the RSPCA receives from the public about concerns over puppy buying (see Figure 4) and the enforcement work undertaken by the RSPCA, that the main markets for puppies tend to be close to urban centres such as London, Manchester and Tyneside. Those puppies that need to be moved from the areas where they are bred to the areas where they are sold, will be transported invariably by middlemen called puppy dealers. The successful conclusion of one of the RSPCA's investigations into the puppy trade in Manchester, highlighted the routes used by this particular group of puppy dealers, namely from the breeding farms in Ireland through ports in West Wales to the markets in Manchester (Case study 3).

Figure 4: Number of calls received by the RSPCA in 2014 on the puppy trade broken down to geographical area.



²⁰Animal Welfare (Breeding of Dogs)(Wales) Regulations 2014.

²¹Defra. 2015 Consultation on the review of animal establishments licensing in England.

²²www.whatdotheyknow.com/request/carmarthenshire_licensed_dog_bre

²³OATA. 2014. FOIA request on pet shop licensing.

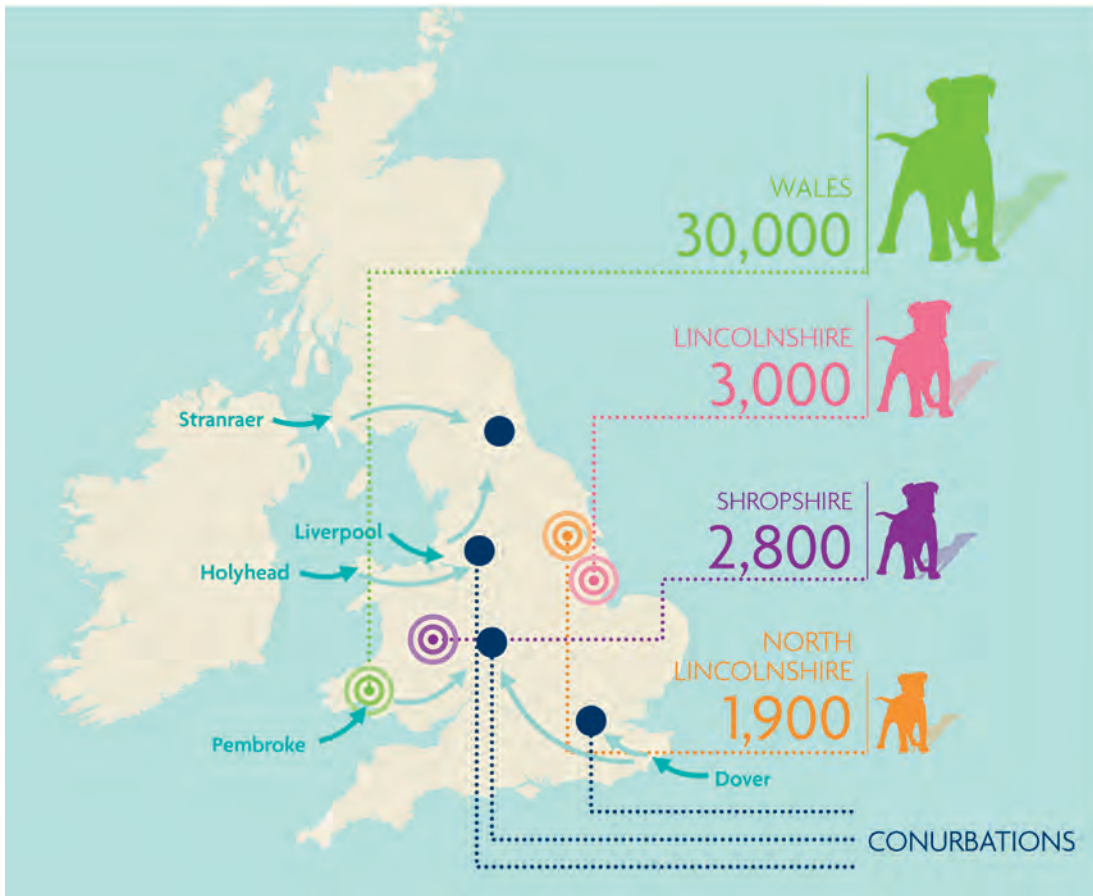


Figure 5: Main commercial licensed puppy breeding regions in the UK, estimated numbers of puppies and entry routes for imported puppies.

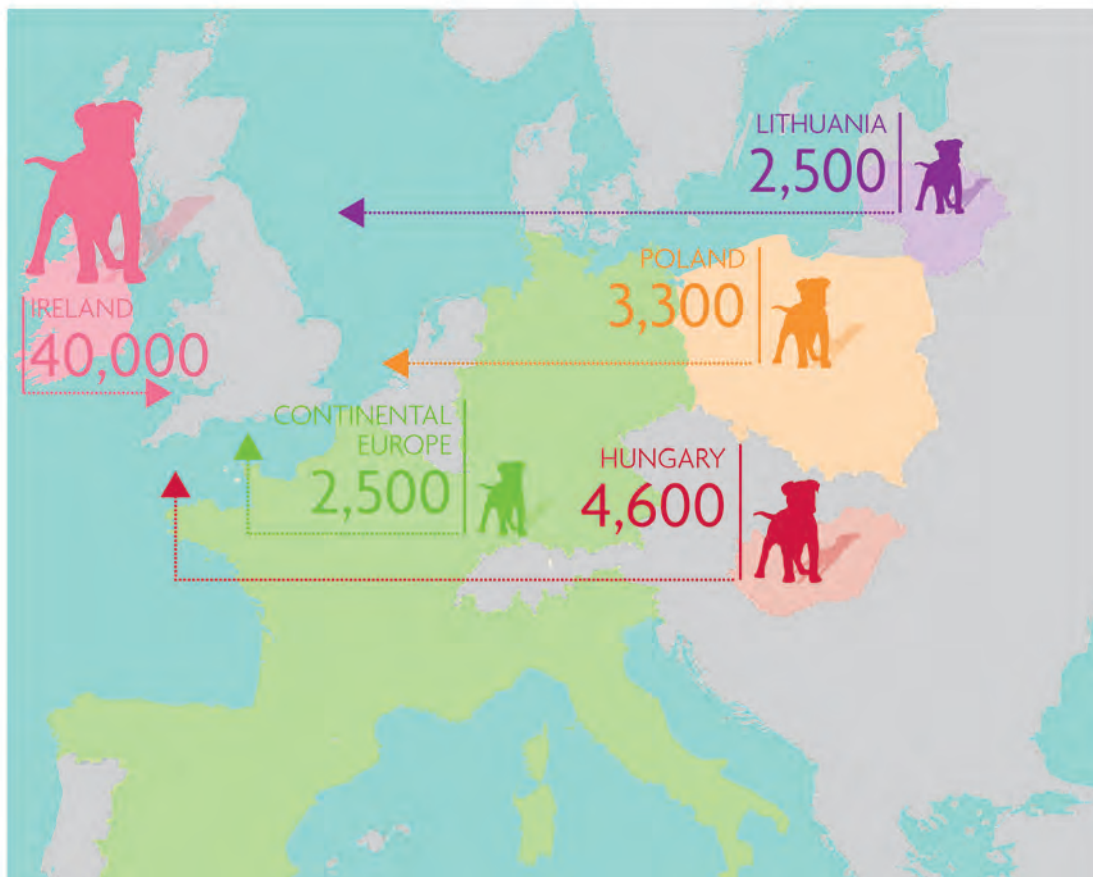


Figure 6: Main puppy breeding countries in the EU that export puppies to the UK and estimated numbers.

Case study 3 How dealers work

The RSPCA investigated three puppy dealers based in Manchester over a five-year period. In 2015 they were found guilty of animal welfare and fraud offences. The RSPCA investigation found the gang were importing puppies from Ireland using numerous fake names. The puppies were transported to a holding address in Manchester and kept in pods until a buyer was found. Puppies were advertised on the internet using numerous mobile phone numbers specific to each breed of dog. This made it appear that the puppy seller only specialised in this breed rather than being part of a multi-million pound puppy import business. Once a buyer was interested in a sale, the puppies were transferred to fake homes to make it look like the puppies for sale had been bred in a homely, family environment. Sometimes an adult dog was used to appear as the mother of the puppies. When the business was raided 87 dogs were found including Pomeranians, French bulldogs, shih-tzus and Yorkshire terriers.



What is the buying behaviour of potential puppy owners?

Many potential puppy owners invariably seem to want a certain breed or type of dog, the choice of which is likely based on a variety of factors such as peer pressure or because they have previously owned such a breed.

As the previous section has described, puppies are available from a variety of sources. Some people will do their research and get the dog from a responsible breeder who has bred responsibly and prioritised health and welfare. The advantages to the buyer of getting puppies from responsible breeders who put welfare first includes the ability to access information on the puppy such as its age, medical and genetic background and seeing the puppy with its mother. Other buyers may consider rescue organisations, although they may be limited in numbers and breeds, limiting the choice for potential buyers.

If a buyer chooses to source a puppy from either rescue organisations or responsible breeders, it is probable that they will be required to make several visits and possibly be subject to a final home check to ensure the puppy is going to a good home. This is a relatively long process and can span several weeks.

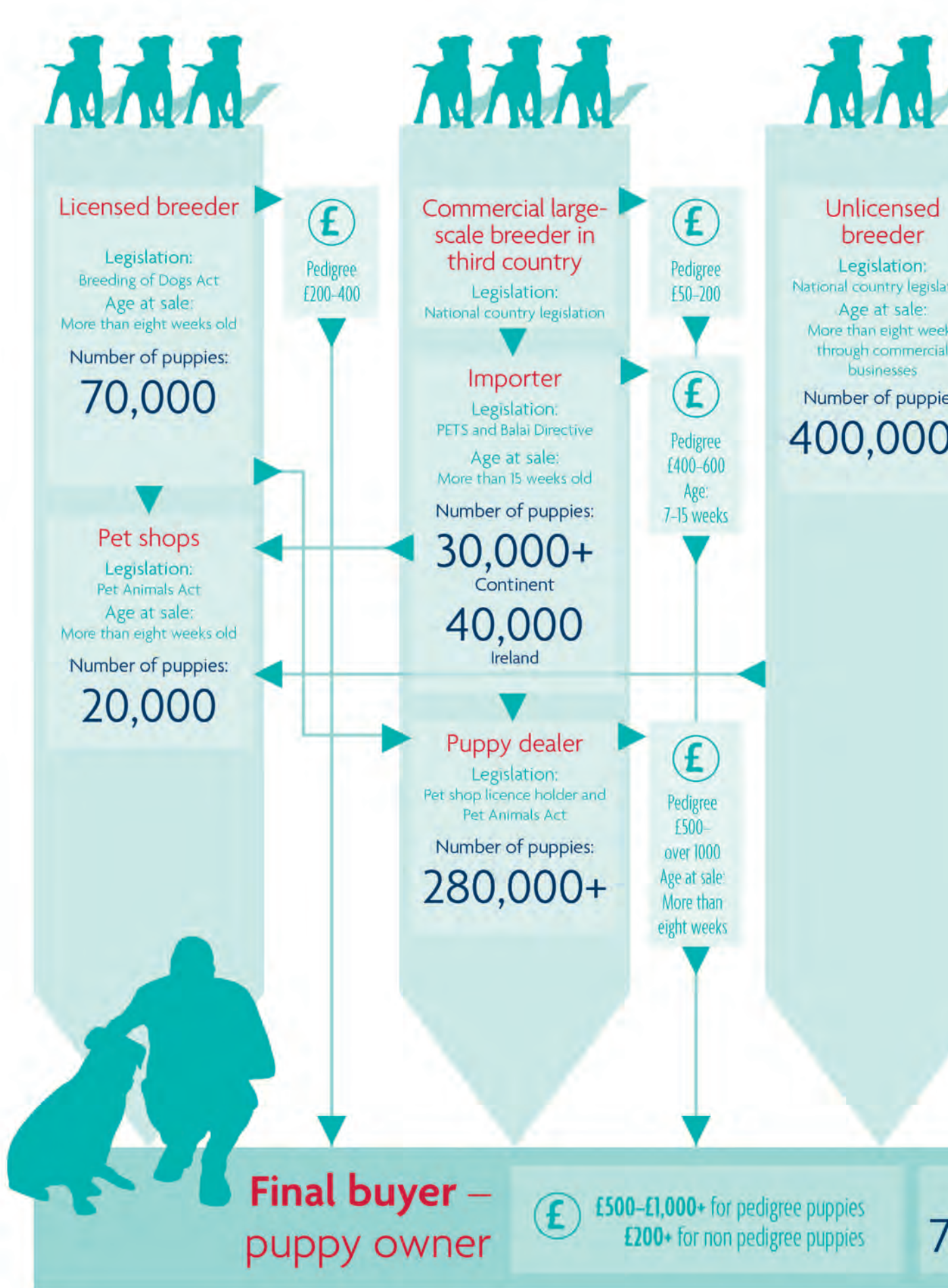
Just as the motivation for some prospective owners to obtain a puppy can be very strong, so will be the desire to reduce this time and to get the puppy as quickly as possible. The internet provides the ideal way for a quick purchase, which can be less than a day. Many adverts use phrases such as “ready to go now” to emphasise the rapid process²⁴.

The other strong motivation to get a puppy is the ‘cute’ factor, which seems to be at its strongest between the ages of six and 16 weeks. As puppies are at their most marketable at this age this invariably means the seller has a very short time period to sell the puppy. This time period is limited by the minimum age at which a puppy can be sold (eight weeks under the Pet Animals Act or 15 weeks if the puppy is imported). Accurately ageing a puppy is difficult so this increases the potential for importers and dealers to lie about the age of the puppy²⁵. Selling or importing puppies under the legal minimum age also increases the risk of behaviour and health problems affecting the puppies. They may be too young to vaccinate against disease such as parvovirus and in the case of imported puppies they are being transported at a critical stage of their behavioural development (see page 13).

²⁴For example: www.preloved.co.uk/adverts/list/3359/dogs.html?keyword=french.bulldog accessed 21.12.15.

²⁵Dogs Trust. 2014. The puppy smuggling trade.

Sold a pup? Exposing the breeding trade and sale of puppies



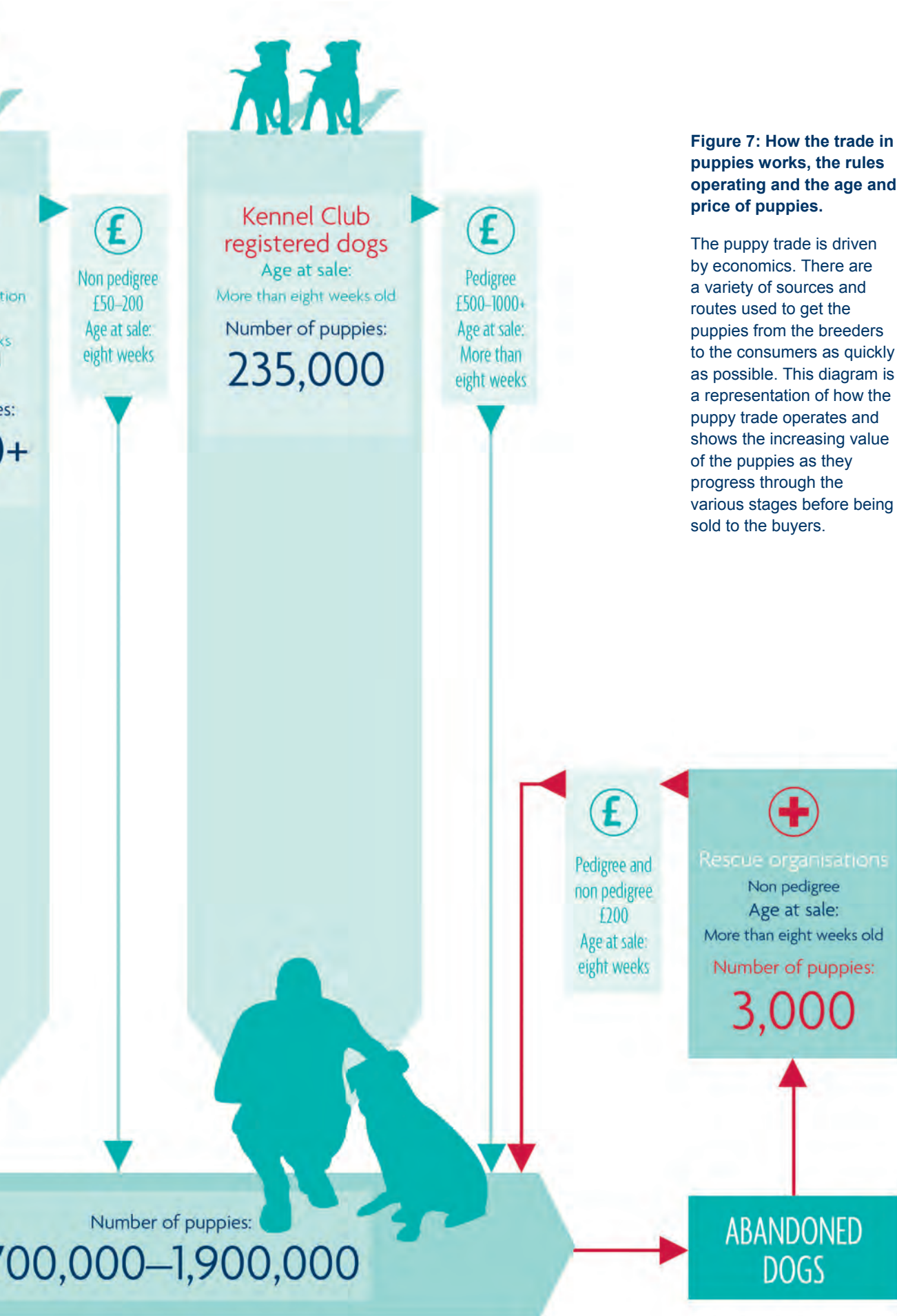


Figure 7: How the trade in puppies works, the rules operating and the age and price of puppies.

The puppy trade is driven by economics. There are a variety of sources and routes used to get the puppies from the breeders to the consumers as quickly as possible. This diagram is a representation of how the puppy trade operates and shows the increasing value of the puppies as they progress through the various stages before being sold to the buyers.

How are puppies marketed and sold?

It is thought that around 30 percent of puppies are sold through the internet²⁶. Recent PDSA data shows that in 2011 28 percent of people obtained their dog from an advert, which declined to 22 percent in 2014. An additional 16 percent obtained their dogs from friends or family²⁷.

Although less than four percent of pet shops sell dogs, it is thought that around five percent of pet shop licence holders conduct their business through private accommodation, a loophole that is exploited by puppy dealers to sell puppies²⁸.

Dealers will offer “homes” as a reassurance to potential buyers when in fact these are rented properties where no-one is actually living (Case study 3). This is all to get a quick sale, making it look as though the puppy comes from that home when in fact it has been transported from elsewhere and in some cases from another country (Case study 3). Once the purchase has been made the home can be vacated so the seller cannot be traced. Some dealers also supply fake or meaningless documents to the buyer (Case study 4).

These dealers should have pet shop licences so they can sell the puppies commercially although not all will have such licences (Case study 1). However they do not have to have commercial pet shops making it almost impossible for local authorities to decide when renewing the licence if the business and its premises meet the conditions under the Pet Animals Act. This could be solved if all sellers were issued with a licence with welfare conditions attached to it.

Case study 4 Using fake documentation to reassure the buyer

The RSPCA investigated one gang of puppy dealers in 2015 who were giving buyers a form entitled ‘Kennel Registration’ to reassure them that the puppies were healthy and from genuine breeders. These forms, which were meaningless and produced from a photocopier on a daily basis, were issued to the buyer along with free time-limited insurance.

What are the economic incentives?

A recent study found that the trade in cats and dogs was worth €1.3 billion annually in the EU²⁹. Around 30 percent of the puppies bred in Europe are bred by breeders with fewer than 10 dogs and 87 percent of the European sales are dominated by hobby breeders, for whom breeding dogs is not their main source of income²⁹. However 10 percent of the trade comes from breeders breeding more than 200 dogs each annually²⁹. Financial incentives can be great for these commercial breeders and the commercial dealers (Case study 5).

In 2015 an investigation by BBC Scotland estimated that one dealer was earning £200,000 a year importing puppies from Ireland into Scotland³⁰. In December 2015, following a consultation, the government proposed changes to the legislation on extending data-gathering powers on hidden economies such as the puppy trade.

Case study 5 Profit margins in the trade

Income from the trade can be high. Investigations by the RSPCA on the Manchester puppy dealers found they were earning £35,000 a week, £2 million annually of undeclared income. These puppies were being sold for £550–£1,000 depending on the breed, even though they had been bought for around £200 from the puppy farmer in Ireland – demonstrating the potential for mark-up in the trade. (See Figure 7.)



²⁶APGAW. 2009. A healthier future for pedigree dogs. www.apgaw.org/data/sites/1/PDFs/a-healthier-future-for-pedigree-dogs.pdf

²⁷PDSA. Wellbeing reports. 2011–15.

²⁸OATA. 2014. Pet shop licensing. www.ornamentalfish.org/wp-content/uploads/2014/04/FOI-Request-on-Pet-Shop-Licensing_FINAL.pdf

²⁹European Commission. 2015. Study on EU trade in cats and dogs.

³⁰BBC Scotland. 2015. The dog factory.

What are the welfare problems?

The way in which a puppy is bred and reared plays a significant role in its future physical and psychological health. The choice of breeding stock – both dog and bitch – and the management of the bitch pre and post parturition, play a pivotal role in determining the dogs' psychological health. It is especially important that the offspring are introduced to a wide range of people, other dogs and animals between three and 12-14 weeks of age³¹, because at this stage they learn the most about the characteristics of those they meet³². In the same way, puppies also need to be habituated to the sights, sounds and smells associated with different environments.

If opportunities for socialisation or habituation are lacking or inappropriate, and the environment sub-optimal, then puppies can be at greater risk of developing behaviour problems such as avoidance behaviour and aggression when older^{33,34}.

Puppies trafficked from other countries are at particular risk of developing behaviour problems if they have been bred and reared in sub-optimal environments, and the way in which they are transported and kept prior to sale can also have detrimental effects. For example, long distance transport can result in the uncontrolled exposure to other dogs and people which can be significant sources of anxiety, fear and stress and if experienced during the socialisation period, could have a significant and detrimental impact on the dog's future behaviour. While health



A West Highland terrier puppy that became ill after purchase was one of more than 3,500 complaints the RSPCA received in 2015.

problems such as those described below can be relatively short lived and managed with medication so that the dog does not suffer; fear and anxiety related behaviour can be chronic, requiring significant commitment from the owner and can severely impact a dog's quality of life.

A lack of hygiene and barrier controls throughout all stages of the trade can also increase the transmission of disease, such as parvovirus. For example, puppies may be sick at the point of sale leading to high veterinary bills for the owner and poor welfare for the puppy, which in some cases may lead to euthanasia (Case studies 6 and 7).

What controls currently exist to deal with the breeding, dealing and sale of puppies?

A summary of the legislation is given in Table 1.

Legislation is completely devolved but is old, reliant on good enforcement and inspections and tends not to be a priority for enforcement bodies.

Case study 6 Welfare problems in the puppy trade

BBC Scotland investigated the trade in puppies from Ireland to Scotland and reported that around 20 percent of puppies bought on the internet will die in six months³⁰. One of the puppies they looked at, a King Charles spaniel, died from parvovirus within three days of being bought from a dealer in Scotland.

Case study 7

The RSPCA received more than 3,500 calls about puppy farms in 2015, a 122 percent increase on five years ago (see Figure 6). Many of these included people complaining that their puppies had become ill after they had been bought. Case studies include a person who purchased a West Highland terrier which had almost immediately developed diarrhoea, and was very lethargic. The vet informed the owners that the little puppy had a high temperature and was underweight as well as suffering from conjunctivitis. In a second case, of 39 puppies seized by the RSPCA from one commercial puppy dealer, six were so sick they had to be euthanased immediately and 25 had congenital defects.

³¹Morrow M, Ottobre J, Ottobre A, Neville P, St-Pierre N, Dreschel N, and Pate J. (2015). Breed-dependent differences in the onset of fear-related avoidance behavior in puppies. *Journal of Veterinary Behavior: Clinical Applications and Research* DOI: 10.1016/j.jveb.2015.03.002.

³²www.apbc.org.uk/articles/puppysocialisation1

³³Appleby D L, Bradshaw J W S, Casey R A. 2002. Relationship between aggressive and avoidance behaviour by dogs and their experience in their first six months of life. *Veterinary Record*. 150. 434–438.

³⁴Casey R A, Loftus B, Bolster C, Richards G, Blackwell E J. 2013. Human directed aggression in domestic dogs (*Canis familiaris*): occurrence in different contexts and risk factors. *Applied Animal Behaviour Science*. McMillan F D, Duffy D L, Serpell J A. 2011. Mental health of dogs formerly used as 'breeding stock' in commercial breeding establishments. *Applied Animal Behaviour Science*. 135. 86–94. McMillan F D, Serpell J A, Duffy D L, Masaoud E, Dohoo I R. (2013). Differences in behavioral characteristics between dogs obtained as puppies from pet stores and those obtained from non-commercial breeders. *Journal of the American Veterinary Medical Association*. 242. 1359–1363.

Table 1: Summary of main legislation relating to the trade, sale and breeding of dogs in the UK

| Issue | Legislation | What it does | How effective is it at dealing with the trade? | Consequences |
|-------------------------------|--|--|---|---|
| Breeding of puppies | Breeding of Dogs Act 1973 (England and Scotland) Breeding and Sale of Dogs (Welfare) Act 1999 (England and Scotland) Animal Welfare (Breeding of Dogs) (Wales) Regulations 2014 | Sets conditions for licensing of commercial dog breeding establishments; dogs cannot be sold before eight weeks of age. | Enforcement is a challenge; it allows issuing of licences for any dog breeders but it is only mandatory for those breeding five or more (England) or three or more litters (Wales) a year. | Puppy dealers do not have to be licensed if they are buying rather than breeding but sell commercially bred dogs. |
| Identification of dogs | Microchipping of Dogs (England) Regulations 2014 Microchipping of Dogs (Wales) Regulations 2015 Microchipping of Dogs (Scotland) Regulations 2016 Dogs (Licensing and Identification) Regulations (Northern Ireland) 2012 | Makes it compulsory to identify a dog from eight weeks and ensure that its details are kept up to date. | About 20 percent of dogs are not microchipped yet and it will be a challenge to ensure details are updated ² ; enforcement will be a challenge as it is not seen as a priority area for local authorities and they have not been provided with any extra resources to do so. | |
| International trade | Health status in commercial trade covered by Directive 92/65/EC Health status in non-commercial by PETS Regulation 576/2013 OJ L178/1 28.6.2013 Transport conditions covered by Regulation 1/2005 OJ L 3.1 5.1.2005 | Sets rules on numbers, certification, age and vaccination of dogs traded between countries. Sets conditions on the times, feeding and watering of puppies being transported commercially. | Enforcement is a challenge; illegal trade occurring through PETS being used by commercial dealers and rescue organisations; challenges with fraud and illegal declaration of puppy age. The transport times are limited to 24 hours before a break is required and do not seem to be enforced. | Dogs that are not microchipped, too young or not vaccinated coming into the UK from Ireland and continental Europe; disease, behaviour and health risk of puppies being sold. |
| Sales of puppies/dogs | Pet Animals Act 1951 Licensing of Animal Dealers (Young Cats and Young Dogs) (Scotland) Regulations 2009 Pet Shop Regulations (Northern Ireland) 2000 | Sets up a licensing scheme for pet shops and sale of pet animals; the Scottish law aims to regulate the trade in young cats and dogs. | Enforcement is a challenge; updates under the Animal Welfare Act have been postponed so dealing with the internet is challenging. | Puppy dealers should use a pet shop licence to sell even though they don't have a pet shop. |
| Welfare/cruelty | Animal Welfare Act 2006 (England and Wales) Animal Health and Welfare Act (Scotland) 2006 Welfare of Animals Act (Northern Ireland) 2011 | The framework law to ensure good animal welfare and prevent unnecessary suffering. Further information is provided in the Welfare of Dogs Code of Practice in the relevant countries. | The law provides a good framework; enforcement is done through the Police in Northern Ireland, SSPCA and Procurator Fiscal in Scotland and local authorities and the RSPCA in England and Wales. | |

Why do existing controls fail to tackle the issues associated with the puppy trade and what changes are needed to improve it?

Importation of puppies

Puppies can be imported for commercial purposes or under the non-commercial trade rules that were set up to allow free movement of people's pets. This law is one of the few dog laws covered by European rules³⁵. The non-commercial rules are intended to strike a balance between allowing free movement of people's pet dogs for holidays or dog shows and ensuring diseases such as rabies and Echinococcus are contained. So, the law makes it easier for dog owners to travel throughout the EU but aims to limit the spread of diseases being carried by puppies by vaccinating them before travel. The same law that allows for free movement of people's pets, also creates the opportunities and loopholes that can be exploited by commercial dealers to move puppies around^{25, 36}. As anyone can transport up to five dogs if they follow the rules, puppies can be moved as pets but then traded commercially once arriving at the final destination (Case study 8).

Puppies can also be imported commercially under non-commercial rules and then rebranded as British animals³⁷. Crucially, the changes in the law that came into effect on 29 December 2014, which raised the minimum age at which a puppy can be vaccinated, have meant that any puppies entering the UK have to be more than 15 weeks old. This may curtail the trade in puppies from Ireland and continental Europe, although ageing a puppy accurately is extremely challenging and lessons from Belgium suggest that the trade has not changed radically there¹⁴.



Conditions in some puppy breeding centres are inadequate in meeting the dogs' welfare needs.

Case study 8

In 2015 the City of London undertook a joint operation with a number of agencies, including Kent County Council and Border Force, to conduct a series of targeted and simultaneous enforcement operations at the Port of Dover and Coquelles to prohibit the illegal entry of dogs and undertake enforcement action. Five Lithuanian post vehicles were found to contain puppies with false information in their passports – all the puppies were from Lithuania. The majority of animals intercepted were younger than the stated age on their passports and although all were declared fit for travel they had all been transported for up to 30 hours and none of the drivers could supply adequate food and water. The puppies were sent to vets for treatment and were quarantined.

PROBLEMS:

- Puppies being imported under non-commercial rules and then sold commercially
- Puppies being imported younger than 15 weeks old
- Unvaccinated and unidentified puppies being imported
- More than five puppies per person being imported under non-commercial rules.

SOLUTIONS:

- Undertaking spot enforcement checks at the four main entry points (Dover, Fishguard, Holyhead, Stranraer) and prosecuting dealers who evade the rules
- Ensure that there is intelligence sharing between the non-governmental sector and the statutory agencies to improve the understanding of how the trade operates and minimise impacts of financial cutbacks.

RECOMMENDATION:

The government should increase risk-based spot checks at Dover and Holyhead on consignments of dogs from Ireland and other targeted European countries (e.g. Romania, Lithuania) to enforce the rules on non-commercial trade in dogs and puppies; this should focus on commonly evaded paperwork such as mis-declarations on the age of the animal being imported, a dog's vaccination certificate, and checking that the microchip matches the certificate.

³⁵Regulation 576/2013 OJ L178/1. 28.6.2013.

³⁶RSPCA. 2015. Pushing at an open door – how the present UK controls on rabies are failing.

³⁷BBC Scotland. 15.4.15. The Dog Factory www.bbc.co.uk/news/uk-scotland-32305787 accessed 23.7.15

RECOMMENDATION:

Responsibility for checking that the PETS system is being implemented and enforced should be transferred from the ferry companies to the statutory border control agency and the threat of disease risk should be increased in its level of importance.

RECOMMENDATION:

A centralised database of illegal activities in the dogs and puppies trade should be established, with data made available for scrutiny and analysis on a specified and regular basis to assess trends and numbers of dogs being imported to Great Britain. Cases of illegal activity reported by veterinarians, where microchips in dogs and puppies submitted to them do not match the paperwork, should be presented.

RECOMMENDATION:

The governments of the United Kingdom and Ireland should meet to discuss the findings of the analysis around imports of dogs and puppies between the two nations and since the recent changes in legislation in Ireland and the changes in 2012 and 2105 under PETS. At present, puppies are coming from Ireland to Northern Ireland and Scotland, being mis-declared as British puppies and being sold under false documentation. As there are only four main entry points (Holyhead, Stranraer, Fishguard, Pembroke) and a limited number of sailings, enforcement activity can be targeted and increased.

Laws on breeding of puppies

These laws are completely devolved, so covered by four different sets of rules, but they all stipulate that any breeding for commercial purposes needs to be licensed and follow certain standards, set by local authorities. The legislation can be difficult for local authorities to enforce and may not be a priority. The rules on microchipping, due to come into effect in April 2016, provide an opportunity to link the puppy or dog with the breeder; by improving traceability, transparency in breeding could improve. In December 2015 Defra announced a consultation that proposes to reduce the number of litters being bred annually before a licence is compulsory.

PROBLEMS:

- Puppies being bred commercially in substandard and inconsistent conditions without the appropriate enforcement licence checks
- Puppies being bred by breeders who breed fewer than five litters a year in England so may not be fulfilling the definition of a commercial breeder.

SOLUTIONS:

- Clarification of the legislation on puppy breeding for local authorities and ensuring they have the training and capacity to undertake inspections of breeding establishments and investigate complaints
- Development and implementation of a robust and evidence-based licensing scheme underpinned with, and audited against, standards that protect health and welfare
- Develop independently accredited assurance schemes for recognised breeders that are meeting welfare standards
- Publicise those breeders who may not be meeting breeding standards or evading revenue taxation rules
- Breeders and prospective owners are to be encouraged and incentivised to use the RSPCA/BVA AWF puppy contract
- Reduce the number of litters produced per year that require the breeder to have a licence to two in England.

RECOMMENDATION:

Ensure local authorities have the training and capacity to undertake inspections of breeding establishments, and develop and implement robust and evidence-based standards that must be enforced.

RECOMMENDATION:

Develop a robust and evidence-based independently accredited assurance scheme for breeders, pedigree or otherwise, that are meeting specified welfare standards to give potential buyers some confidence in the puppies they are buying.

RECOMMENDATION:

A helpline should be set up to allow people to report anonymously any person they suspect of breeding puppies and not declaring the income. This system could work on the same lines as the National Benefit Fraud Hotline. This information would be used by local authorities when considering licence applications and be used to investigate tax fraud.

The identification of puppies

This requirement will come into effect in April 2016 in Scotland, England and Wales, and is already in place in Northern Ireland. This will ensure that any puppy older than eight weeks of age is microchipped and its details are updated whenever the dog changes hands. This should provide a link back to the breeder and any subsequent owners. It should also give clearer information on the number of puppies sold every year in Britain and has worked in other countries where it is used, such as Belgium, where 90 percent of dogs are microchipped^{14, 29}. At present it is thought that around 20 percent of dogs still

remain to be microchipped in England^{38, 2} and 22 percent in Wales³⁹ and it is believed that the legislation will only be as effective as its enforcement.

PROBLEM:

- Puppies being sold without proper identification so making it impossible to trace the animals back to the owners or original breeders if the animal becomes sick or has other problems. Although this will be mandatory in 2016 in Scotland, Wales and England it will depend on enforcement through dog wardens, but they are not being provided with any extra resources for this and their numbers are being cut.

SOLUTION:

- Bringing in compulsory microchipping in 2016 will be a major step forward, but it is important the local authorities have the resources to enforce the legislation and vets who scan dogs report those that are not microchipped. Both measures will help to reduce the number of dogs that remain unmicrochipped.

RECOMMENDATION:

Ensure that local authorities are given the assistance in training in the procedures required to enforce the legislation and that vets and dog wardens routinely scan dogs when they are presented to them.



The selling of puppies

This is covered by legislation in England and Wales that is nearly 65 years old and is long overdue for an update. The Pet Animals Act was written at a time when most puppies were sold through pet shops, compared to now when around five percent are sold through pet shops and around 30 percent sold through the internet^{2, 7}. Although less than four percent of pet shops sell dogs, around five percent of pet shop licence holders conduct their business through private accommodation, a ruse exploited by puppy dealers to sell puppies⁴⁰. As commercial puppy breeders can only

sell through their premises or to those with a pet shop licence this provides the cover that commercial dealers need to sell puppies from a non-commercial space.

PROBLEM:

- The Pet Animals Act is out of date and provides a loophole for commercial puppy dealers to sell puppies through private premises rather than commercial pet shops, which makes it impossible for the licensing authority to check if the premises are clean and provide the standards of care required.

SOLUTION:

- The Pet Animals Act needs to be updated, as agreed by the government in 2015 when they issued their consultation. This proposes making it illegal to sell puppies below the age of eight weeks to anyone and to licence anyone selling a puppy. The RSPCA supports both proposals and would want welfare conditions to be attached to the licence to close the current loophole.

RECOMMENDATION:

Amend the Pet Animals Act 1951 to ensure that any seller of dogs is licensed and attach evidence-based animal welfare standards to it to ensure welfare needs are met and welfare protected. This would solve the problem with pet shop licence holders who sell from a private address, but as it is not a commercial premises it does not get inspected by the local authority when they are issuing the licence. It would also reduce the number of unlicensed puppy sellers. Make it illegal to sell a puppy below the age of eight weeks to anyone.

RECOMMENDATION:

The internet plays a vital role in the sale of puppies from large-scale commercial breeders. Of the phone calls the RSPCA received on puppy trade issues, 87 percent were concerning puppies bought via the internet. Internet sales of puppies are self-regulated although some sites, such as Gumtree, have taken a proactive stance to enforcing their policies on sales of animals that could be illegal or have welfare concerns and tens of thousands of adverts have been withdrawn. This self-regulation, launched in September 2013, has led to some progress but this approach has not been taken up by sites such as Pets4homes and Epupz. It is recommended that all sites adopt this regulatory system. New legislation in France will make it compulsory for any sale on the internet to only be allowed if it is linked to a taxation reference number, so providing a link back to the breeder⁴¹. The government should look at this to assess its effectiveness.

³⁸BVA. 1.7.2015. www.bva.co.uk/News-campaigns-and-policy/Newsroom/News-releases/Quarter-dogs-not-microchipped-less-than-a-year-to-go

³⁹Government of Wales. 2015. http://gov.wales/statistics-and-research/national-survey/?tab=el_home&topic=local_area__environment&lang=en

⁴⁰OATA. 2014. Pet shop licensing. www.ornamentalfish.org/wp-content/uploads/2014/04/FOI-Request-on-Pet-Shop-Licensing_FINAL.pdf

⁴¹Rapport au Président de la République relatif à l'ordonnance no. 2015-1243 du 7 Octobre 2015 relative au commerce et à la protection des animaux de compagnie. JORF no.0233 du 8 Octobre 2015 page 18283 texte no. 30.

The top ten recommendations

The ten recommendations here are not set out in priority order but are essential if the trade in puppies is to be better controlled and puppies' welfare to be better protected.

Every puppy bred and sold should have the best chance of being happy, healthy and living an enjoyable life. Their parents' welfare needs must also have been met. Every consumer should be able to buy a puppy that is happy and healthy,

particularly as many people's motivation to purchase a puppy is likely to be so high that they will fail to do any research prior to purchase. This impulse buying could cost them thousands of pounds in veterinary and behavioural care.

The welfare of these puppies can be compromised at each stage including breeding, transport and sale. Each of these areas needs to be improved.

Recommendation 1:

Amend the Pet Animals Act 1951 to ensure that any seller of dogs is licensed and attach evidence-based animal welfare standards to it to ensure welfare needs are met and welfare protected. This would solve the problem with pet shop licence holders who sell from a private address which, as it is not a commercial premises, does not get inspected by the local authority when issuing the licence. It would also reduce the number of unlicensed puppy sellers. Make it illegal to sell a puppy below the age of eight weeks to anyone.

Recommendation 2:

The government should increase risk-based spot checks at Dover and Holyhead on consignments of dogs from Ireland and other targeted European countries (e.g. Romania, Lithuania) to enforce the rules on non-commercial trade in dogs and puppies; this should focus on commonly evaded paperwork such as misdeclarations on the age of the animal being imported, a dog's vaccination certificate, and checking that the microchip matches the certificate.

Recommendation 3:

Responsibility for checking that the PETS systems is being implemented and enforced should be transferred from the ferry companies to the statutory border control agency and the threat of disease risk should be increased in its level of importance.

Recommendation 4:

A centralised database of illegal activities in the dogs and puppies trade should be established with data made available for scrutiny and analysis on a specified and regular basis to assess trends and number of dogs being imported to Great Britain. Cases of illegal activity reported by veterinarians, where microchips in dogs and puppies submitted to them do not match the paperwork, should be presented.

Recommendation 5:

The governments of the UK and Ireland should meet to discuss and publish changes and trends in imports of dogs and puppies between the two nations. At present puppies are coming from Ireland to Northern Ireland and Scotland, being changed into 'British' puppies and being sold under false documentation. As there are only four main entry points (Holyhead, Stranraer, Fishguard, Pembroke) and a limited number of sailings, enforcement activity can be targeted and increased.

Recommendation 6:

The internet plays a vital role in the sale of puppies from large scale commercial breeders. Of the phone calls the RSPCA received on puppy trade issues, 87 percent were concerning puppies bought via the internet. Internet sales of puppies are self-regulated but it is essential that the government increases pressure on all internet sites to adopt the Code of Practice already used by a few sites and look at other mechanisms such as linking sales with a tax code as is happening in France.

Recommendation 7:

A helpline should be set up to allow people to report anonymously any person they suspect of breeding puppies and not declaring the income. This system could work on the same lines as the National Benefit Fraud Hotline. This information would be used by local authorities when considering licence applications and be used to investigate tax fraud.

Recommendation 8:

Ensure that local authorities are given the assistance in training in the procedures required to enforce the legislation and that vets and dog wardens routinely scan dogs when they are presented to them.

Recommendation 9:

Ensure local authorities have the training and capacity to undertake inspections of breeding establishments, and develop and implement robust and evidence-based standards that must be enforced.

Recommendation 10:

Develop a robust and evidence-based independently accredited assurance scheme for breeders of pedigree and non-pedigree dogs that are meeting specified welfare standards to give potential buyers some confidence in the puppies they are buying.

Conclusion

The market and trade in puppies is largely unregulated, resulting in welfare problems with puppies and the breeding stock, dissatisfied and often distressed consumers and a hidden economy. Legislation has failed to keep up with radical changes in how puppies are bred and sold in the past few decades, particularly the growing importance of internet sales. The growing demand for puppies does not seem to be satisfied by the existing small-scale breeder, and appears to have resulted in unregulated large-scale commercial breeding of puppies and imports of puppies from Ireland and continental Europe. This trade poses health and welfare risks to dogs.

Although legislation on puppy breeding and sales is devolved it is essential that there is a unified approach to this in the UK and across Europe. The European Commission study released in November 2015 shows some of the positive changes that can be made to legislation through mandatory registration, linking regulation on the internet sales of puppies to responsible breeders and improving the breeding conditions for these animals. The governments in the UK need to respond to this challenge, improve the legislation on breeding and sales and ensure that the new registration legislation is adequately resourced and enforced. Consumers and the animals themselves require nothing less.





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