

# Policy Position: Third Party Sale of Puppies

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## Introduction

The Pet Animals Act 1951 requires that anyone carrying out a business of selling animals as pets from premises of any nature (including a private dwelling) is required to hold a pet shop licence. There are exemptions under the Act for breeders of pedigree animals but anyone buying in animals to sell commercially as pets must hold a licence, irrespective of whether the activity is conducted from retail premises or involves sale of animals directly to the public.

Licences are granted by local authorities following an assessment of the facilities to determine suitability for housing live animals. The Pet Animals Act 1951 does not indicate or restrict species which may be sold through a licenced pet shop but local authorities must indicate a permitted list of taxa on the licence. Licences are granted against conditions set by local authorities. Many versions and variations of conditions are used by local authorities, with some only requiring the criteria set out in the Pet Animals Act 1951 and others with bespoke conditions overlaying the 2013 *Model Conditions for Pet Vending Licensing*. All premises must be inspected against the respective conditions. Currently inspections also vary in frequency across different local authorities.

Currently around 80 licensed pet shops in Great Britain are permitted to sell dogs (puppies). Licences granted to the 'retail' sector (traditional pet shops) account for fewer than 40% of this total. The majority of licensed pet 'shops' selling puppies are puppy dealers operating from non-retail premises such as private residences or agricultural buildings. About 38% of pet shop licenses permitting the sale of dogs are granted to licensed dog breeders. This enables breeders to buy in puppies from external sources to sell alongside puppies

bred on their own premises. In this case, purchasers may be entirely unaware that they are purchasing a puppy that the seller hasn't bred.

## Issues

Responsible breeders, by definition, will want to ensure that they are personally involved in finding suitable homes for puppies that they have bred and for this reason would never sell puppies to a third-party agent. Pet shop licence holders are therefore restricted to purchasing from breeders who are unconcerned about the future lives of their puppies. With no direct link to the new owner, such breeders have detached themselves from any moral or legal accountability resulting for problems that may develop (for example, in terms of puppy health or behaviour). The longer the chain between breeder and final owner, the more difficult it becomes to determine the point at which problems develop. For example, tracing the origin of outbreaks of disease would require multiple premises to be tested.

The division of profit from puppy sales between breeder, seller and any additional 'middlemen' means that breeders receive minimal net revenue per puppy. Consequently high-volume breeders selling through licensed pet shops must therefore maximise the number of puppies produced, while at the same time keeping their overheads to a minimum. (It should be noted that numerically small or 'one-off' breeders who are not seeking to make large profits might also find this an easy way to dispose of puppies although there is little evidence to show that this is the case). The third-party trade in puppies perpetuates a culture of low welfare, high volume dog breeding comparable to factory farming animals for the food chain. This has a hugely detrimental impact upon the physical and mental wellbeing of breeding dogs and puppies. It also results in the production of large numbers of dogs that are at a high risk of developing health and or behavioural issues. As such, this method of breeding is wholly inappropriate for producing fit for purpose companion animals. The problems stemming from the point of origin are compounded by each subsequent part of the chain.

Puppies produced in commercial breeding facilities must be transported to the point of sale, a journey which usually takes many hours and may cover hundreds of miles as licensed pet shops are frequently located in more densely

populated areas. The commercial transportation of young dogs is covered by the Welfare of Animals (Transport) Regulations 2006. However this EU legislation was primarily developed for the transportation of farm animals and equines, with only minimal basic requirements covering domestic pets. While local authorities have a duty to uphold these regulations, in reality there is a significant variation in the application and understanding of the requirements in relation to the movement of dogs. Furthermore, enforcement action in terms of physical inspections of animals during transit appears to be very limited. In addition, the repeated cycling of animals through an environment (e.g. a dealer or pet shop premises) increases the risk of infectious disease. Transmission of such diseases is considerably heightened by a combination of stress, limited biosecurity and compromised immunity arising from poor management at the point of origin. The logistics of the third-party puppy trade mean that the element of transport is unavoidable and intrinsic to this method of sale. It is also a process which is impossible to effectively monitor and enforce regulatory requirements.

The 2013 Model Licence Conditions for Pet Vending acknowledges *'Transport and the introduction to a novel environment are stressful and animals should be allowed to acclimatise before being further stressed by being offered for sale.'* As with transportation, acclimatisation is a feature necessary to the third party trade in animals. It is required both for welfare reasons and as a form of quarantine. However, increasing the period of time that puppies spend in the sales facility delays their introduction to a domestic home environment. This further limits time available for habituation before the critical window for socialisation closes at around sixteen weeks. It also extends exposure to pathogens carried by puppies from other sources.

The necessity of ensuring that pens are easily cleaned results in a barren environment with little or no enrichment. Puppies are commonly kept on sawdust which can be an irritant to their skin and eyes and may be contaminated and with no opportunity to eliminate away from their living quarters. Subsequent housetraining can be difficult. 'Interaction with staff' may provide some opportunity for play, as will handling by potential purchasers. However, puppies are frequently left unattended and away from human contact for the majority of the time. This may lead to separation

anxiety or fear aggression towards people in later life. The commercial nature of the activity results in puppies that have minimal exposure to normal household experiences until they are sold, placing them at a significant disadvantage.

The third-party trade in puppies is a retail activity and therefore the incentive for quick transactions and sales is extremely strong. There is a high risk that impulse purchasing will be encouraged and that sales will take precedence over ensuring a suitable home. Unsold puppies rapidly decrease in appeal and value, while requiring more food and space. This increases the pressure for a sale and may lead to a price reduction, further encouraging impulse or pity purchasing. As with sourcing animals, licence conditions almost never contain requirements for the appropriate and ethical 'disposal' of unsold puppies.

### **DBRG Position**

DBRG is opposed to the sale of puppies through third parties including pet shops as these represent a key vehicle for the sale of puppies from puppy farms and other irresponsible breeders. While model licensing conditions for breeding premises are essential, licensing conditions for pet shops can never mitigate the intrinsic harms associated with the process of sale through them. DBRG regards all those who breed dogs as having responsibility for compassionately homing them. This will ensure a greater degree of accountability for breeders which in turn will incentivise more responsible breeding processes. Educating the general public to avoid purchasing a puppy via third party sales is an important part of an overall official welfare strategy. It is disingenuous on the part of Government officials and Ministers to attempt to educate the purchasing public to avoid suppliers that have been sanctioned and endorsed through the licensing framework.

Consumers are vulnerable due to the inevitable emotional component involved in purchasing a puppy. Vendors who cannot adhere to the basic good practice of enabling purchasers to see puppies with their mothers should therefore be eliminated from the market place. DBRG recognises that removing the highest risk category of vendors is only the first step towards overall improvements in dog breeding health and welfare standards. It is essential that consumers are also able to identify welfare conscious breeders,

for example through the use of the RSPCA/BVA AWF **Puppy Contract** and breeding schemes such as the DBRG **Standard for Dog Breeding**.

## **Recommendations**

All Members of DBRG believe that in the interest of best protecting the welfare of dogs there should be an outright ban on the sale of puppies through commercial third-party vendors. DBRG believes that anything less than this option would seriously compromise the welfare of dogs. This is our core recommendation.

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