

# THE BIG FOUR

Did the dogs deserve more?



## INTRODUCTION

On Tuesday, 19<sup>th</sup> April the UK's four largest animal welfare charities sat before the EFRA Sub-Committee to present their evidence as part of the EFRA inquiry into 'Animal Welfare: Domestic Pets.'

With a combined history of 592 years and income amounting to millions of pounds per year, evidence from Battersea Dogs and Cats Home, Blue Cross, Dogs Trust and the RSPCA was highly anticipated. All four organisations on the panel had produced extensive reports within the last 12 months on various aspects of the puppy trade, so there was a justifiable expectation that their evidence and supporting recommendations would be sound, cohesive and to the betterment of animal welfare.

- Battersea Cats and Dogs Home: Established in 1860
- Blue Cross: Established in 1897
- Dogs Trust: Established in 1891
- RSPCA: Established in 1824

The EFRA inquiry into 'Animal Welfare: Domestic Pets' is an extremely important opportunity to impact positively on the lives of the UK's domestic pets. This is an opportunity that cannot be taken lightly and all evidence givers have a duty to present EFRA with accurate evidence and workable solutions. We may never have an opportunity like this again.

Our coalition of organisations campaign for higher standards of welfare for breeding dogs in general, and in particular, for the prohibition of puppy sales via licensed third party outlets (pet shops). This is the simplest and most effective means of ensuring transparency, accountability and thus responsibility for commercial dog breeders. To this end we function as campaigners, researchers and investigators and in these roles have amassed extensive knowledge and evidence of licensed breeding and pet shop establishments.

Having reviewed the evidence submitted by 'The Big Four', our coalition found itself asking the question 'Did the dogs deserve more?'. We believe the answer to be a resounding, yes.



**Witnesses:**

- Claire Horton: Chief Executive, Battersea Dogs and Cats
- Steve Goody: Deputy Chief Executive, Blue Cross
- Paula Boyden: Veterinary Director, Dogs Trust
- Jeremy Cooper: Chief Executive, RSPCA

**QUESTION 85**

**Chair:** Welcome, all of you. It is very good of you to be here this afternoon. I am going to get stuck in with the first question, which is: what is the scale of the puppy trade in the UK? Who wants to start with that one?

**Jeremy Cooper:** I will kick off, Mr Chairman. It is hard to be specific and exact, but we have good estimates that range from 700,000 to 1.9 million. The reason we have that range is 700,000 is the number that copes with the mortality rate of dogs in the UK, which is around 5.8 million. The 1.9 million comes from a poll from last year where people declared that they had purchased a puppy, so it is clearly a 1.2 million deficit, but that is about as accurate as we could be in terms of numbers.

We know that they are driven by a range of factors, including fashion, because it is chic to have certain dogs. Family and friends create a market by encouraging certainly pets for Christmas and so on. They tend to focus on specific breed: Shih-tzus, Pomeranians and French Bulldogs. Puppies come from a variety of sources, inside the UK and outside the UK. The welfare of the puppies varies enormously in terms of breeding, rearing, transport and sale. We do estimate that 70,000, which is only 10% of the puppy market, are born to registered British breeders, and the remainder come from either imports or unlicensed breeders. We cannot be specific again in the numbers there, other than we do have an idea that the unlicensed breeders is circa 400,000. That is about it.

**Coalition Response:** The RSPCA state they have “good estimates” that the scale of the puppy trade ranges from 700,000 to 1.9 million. This is a significant range, in fact, the higher estimate is over double the lower estimate. The RSPCA estimates that 70,000 puppies - 10% of the puppy market - are born to registered British breeders.<sup>1</sup> The RSPCA estimate a further 400,000 are born to unlicensed breeders, which – based on RSPCA figures - leaves an estimated 230,000 imported puppies. Could the RSPCA provide evidence supporting the figure of 230,000 imported puppies?

**QUESTION 86**

**Chair:** You are saying just 10% are licensed breeders.

**Jeremy Cooper:** Licensed UK breeders, Mr Chairman.

**Coalition Response:** Could the RSPCA provide evidence supporting the estimated figure of 10%, and are they concerned by this low number in terms of dog welfare?

**QUESTION 87**

**Chair:** Therefore, if we are talking about, just for argument's sake, 1 million puppies, we are talking about an awful lot that are either unlicensed or being imported.

**Jeremy Cooper:** That is correct.

**Coalition Response:** Could the RSPCA provide evidence supporting the estimated figure of 1 million puppies, and do they believe this demand must be met and sustained?<sup>2</sup>

**QUESTION 88**

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<sup>1</sup> The term 'registered British breeders' is inaccurate and misleading.

<sup>2</sup> '87 Million Missing Puppies' - <http://www.nathanwinograd.com/?p=16115>

**Chair:** Has anybody any figures on what we believe to be the amount being imported, either legally or illegally?

**Paula Boyden:** Mr Chairman, in terms of illegally it is impossible to tell, because clearly they are often being brought in under the auspices of the pet travel scheme, so under non-commercial movement. There are clearly figures that Defra will release in terms of animals coming in under the pet travel scheme and coming in under TRACES, but again that is a vast underestimation. If we take Lithuania for example, until 2014 there were zero dogs reported to come in under TRACES under commercial movement, and yet we know that there are a lot of puppies being brought in from Lithuania for sale in the UK. It is very difficult to put an accurate number on it.

**Coalition Response:** Dogs Trust state the figures Defra will release in terms of animals coming in under the pet travel scheme and coming in under TRACES, is a vast underestimation. Could Dogs Trust provide evidence supporting their claims that the Defra figures will be a vast underestimation. Dogs Trust state they know there are a lot of puppies being brought in from Lithuania for sale in the UK? Could Dogs Trust provide evidence supporting this claim? Could Dogs Trust confirm how many pet passports have been bought by their organisation in the last 24 months for dogs under 6 months old, as an indication as to how many puppies they themselves import? Could Dogs Trust indicate how many puppies are imported (legally and illegally) by licensed UK breeders under their pet shop licence?<sup>3</sup>

#### **QUESTION 89**

**Chair:** Without leading you, what percentage of puppies are coming in legally, in your opinion? I suspect it is probably quite a low percentage that come in legally, or would that be unfair? I suspect a much smaller percentage are coming in legally than illegally.

**Paula Boyden:** That would be our suspicion: that the legal ones are the minority, particularly those coming in under TRACES. I do not know whether activities that are taking place at the moment will change that, but I think it is a massive underestimation of what is coming into the country.

**Coalition Response:** Dogs Trust state puppies imported legally are the minority, and that illegal imports are a massive underestimation of what is coming into the country. Could Dogs Trust provide evidence supporting this claim, specifically by detailing how many puppies were imported under TRACES and how many illegally imported puppies were identified in the years 2014 – 2016?

#### **QUESTION 90**

**Chair:** With Battersea, are you seeing any of these puppies coming into the home that you can trace back to Central and Eastern Europe and perhaps Ireland or whatever?

**Claire Horton:** Certainly we have been seeing over the last few years increasing numbers of puppies coming in with foreign microchips. We have seen lots of puppies coming in with no microchips, and not all the puppies that are coming to us are necessarily the sorts of desirable breeds that my colleagues are referring to. Yes, we will see French Bulldogs. We will start seeing those adult dogs more and more as time goes by, but we are also seeing the results of lots of unlicensed breeding in urban communities, so lots of bull breeds and home-bred dogs to non-licensed breeders.

**Coalition Response:** Battersea state they are seeing increasing numbers of puppies coming in with foreign microchips. Could it be the case that these puppies are UK bred puppies implanted with foreign made microchips? Battersea state they are seeing the results of lots of unlicensed breeding in urban communities – home bred dogs to non-licensed breeders. Could Battersea provide evidence supporting this claim, as well as quantify the term “lots”. Is it necessarily the case that home bred dogs to non-licensed breeders pose a significant problem? Before the rise of spay and neuter campaigns, it was common for puppies to be born to dogs owned by non-licensed individuals.

#### **QUESTION 91**

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<sup>3</sup> One licensed UK breeder and holder of a pet shop licence imported 350 litters of puppies in 2014.

**Chair:** What is the solution to the issue of indiscriminate breeding, where you may have dogs being bred in back yards or wherever? Is there an easy one?

**Paula Boyden:** If I may, Mr Chairman, clearly at the moment one can breed fewer than five litters without being a licensed breeder. There is a consultation out on licensing at the moment, on reducing to one the number of litters that one can produce before one is licensed, but requiring anybody that is selling or gifting a dog to be registered would start to give us some traceability of where dogs are, where they are being produced and where they are coming from.

**Steve Goody:** One of the significant problems, Mr Chairman, is that there is just a general lack of visibility of the numbers of unlicensed breeders, and whether that is the big, commercial unlicensed breeders - your typical puppy farms - right down to your individual hobby breeder who may or may not be breeding one or two litters a year. From our perspective the solution, rather than necessarily attempting to license absolutely everybody, is to look at a more simplistic form of registration, particularly for the smaller scale breeder, just to give the local authorities and the enforcement agencies some visibility of who these people are and where they are operating from.

**Coalition Response:** Dogs Trust state that one can breed fewer than five litters without being a licensed breeder. This statement was clarified by George Eustice during the parliamentary debate in September 2014 on the regulation of the sale of puppies and kittens – “Those carrying on a business of breeding and selling dogs should be required to have a licence, irrespective of the number of litters.”<sup>4</sup>

Blue Cross suggest a simplistic form of registration, and our coalition supports this approach.

#### **QUESTION 92**

**Chair:** Microchipping, providing they are microchipped, will make all the difference, but it is making sure that those backstreet breeders or accidental breeders are microchipping.

**Jeremy Cooper:** On that, Mr Chairman, last year we received over 3,500 calls from the public on puppy farms, and that is a 122% increase. This is a growing problem. Certainly our investigatory work dealing with this is such a lengthy, time consuming and expensive process. In particular, one case last year took five years to bring to fruition and conclusion, so it is a big problem.

**Chair:** The law needs to be better.

**Coalition Response:** The RSPCA refers to a case last year that took five years to bring to fruition. Could the RSPCA confirm that this case involved a group of people running an illegal pet shop operation and not an illegal dog breeding operation?<sup>5</sup> The RSPCA response did not cover the issue of microchipping.

#### **QUESTION 93**

**Angela Smith:** Good afternoon, everybody. I will be open about this: I agree with your view on registration. Do you agree that it would have to be backed with enforcement? For instance, anybody breeding one litter and not registering would have to face a penalty of some kind if they failed to comply; otherwise it is meaningless.

**Steve Goody:** That is exactly it, Chairman. Any system of monitoring and control around individuals that are breeding smaller numbers of litters of puppies is absolutely meaningless unless there is some meaningful enforcement that sits behind it. We know, because we have had discussions with them, local authorities are resource strapped, whether that is in terms of people, time or increasingly money. I suspect we will go on to talk about this in specifics, but that issue of enforcement is absolutely critical in supporting any system of registration to secure better welfare for those puppies that are being bred by these individuals.

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<sup>4</sup><http://www.publications.parliament.uk/pa/cm201415/cmhansrd/cm140904/debtext/140904-0002.htm>

<sup>5</sup><http://www.politics.co.uk/opinion-formers/rspca-royal-society-for-the-prevention-of-cruelty-to-animals/article/puppy-dealers-jailed-after-making-35-000-a-week-selling-sick>

**Coalition Response:** Blue Cross state local authorities are resource strapped, whether that is in terms of people, time or increasingly money. Would Blue Cross therefore agree that resources would be best targeted at the highest risk categories and for the highest of risk categories to be eliminated altogether as they cannot be brought under satisfactory regulatory control? Could Blue Cross indicate those areas where they believe there to be the highest risk to welfare?

#### **QUESTION 94**

**Angela Smith:** Would you argue that the right penalty would be something like a fixed penalty notice for someone on a one-litter basis? There is a risk here of getting heavy handed.

**Steve Goody:** Yes, you are right. Light touch would be preferred over regulation.

**Paula Boyden:** Chairman, with the registration, we are also aware of situations where several individuals are breeding from one premises but the link is not necessarily being made. Having a registration whereby it is not just the individuals but the premises being linked up would help to build up evidence. If we have larger scale breeding that we are not aware of, that would be very helpful.

**Coalition Response:** Dogs Trust state they are in favour of a registration system whereby it is not just the individuals but the premises being linked up. Our coalition supports this system and would propose linking registration or permit to either a council tax or business tax number dependent on the type of premises.

#### **QUESTION 95**

**David Simpson:** You are very welcome to the Committee. What concerns, if any, do you have about the welfare conditions of dogs bred by unlicensed breeders? What or who would be the typical unlicensed breeder? Describe for the Committee the typical unlicensed breeder.

**Steve Goody:** Chairman, an unlicensed breeder is anybody breeding dogs without a licence, so that could be anyone ranging from a big commercial operator - and we know that they exist, quite clearly - right down to an individual. If you are talking about the concerns from the welfare perspective of the unlicensed breeding sector, there are five things from our perspective quite specifically.

One is there is just no accountability for what they do and how they do it, and therefore you have to assume that significantly there is an issue around the welfare of both the progeny and the dogs that are being bred from in terms of quality. There is the issue that we are generally unsighted on the numbers of puppies that are being bred weekly, monthly and annually through these unlicensed breeder outlets.

There are two other issues that do not get talked about very often. One is around consumer protection. Quite often the individuals that are buying and purchasing and acquiring these puppies are finding themselves in difficulties quite quickly as a result of that poor-quality progeny. The final point is there has been a lot of discussion over the last six or nine months around the hidden economy. Quite clearly some of these individual hobby breeders are making quite a lot of money, and you can reasonably assume that is not being declared to HMRC. There are four or five core issues that are not necessarily just about quality and welfare of progeny and the dogs that these puppies are being bred from. There are other issues that need to be considered, from our perspective anyway.

**David Simpson:** When you talk about the large commercial breeders, would that take into consideration a consortium of breeders that would reach right across every region of the United Kingdom and into the Republic of Ireland?

**Chair:** We are straying a bit on to the next question. Simon will come in on that one in a minute. Carry on the unlicensed breeders, if you would, please.

**Coalition Response:** In the context of the question, Blue Cross define an unlicensed breeder as anybody breeding dogs without a licence. In the context of the question, this is a misleading and inaccurate definition. Unlicensed

breeders are either those exempt from licensing requirements, or those breeding illegally<sup>6</sup>. The former are compliant and not currently requiring state control – the latter are evading the regulatory process which indicates an intent to disregard the welfare controls. These two types of unlicensed breeders are different in all respects.

In terms of unlicensed breeders, Blue Cross make the assumption that significantly there is an issue around welfare of both the progeny and the dogs in terms of quality. They further state there is the issue that we are generally unsighted on the number of puppies that are being bred weekly, monthly and annually through these unlicensed breeder outlets. Could Blue Cross provide evidence to support their perceived significant problems associated with unlicensed breeders?

Blue Cross rightly raise the issue of consumer protection. Could Blue Cross confirm whether there is more of an issue with consumer protection surrounding those in the business of breeding and selling puppies, or private individuals exempt from licensing requirements? Would Blue Cross agree that those in 'the business of' breeding and selling dogs should do more to protect consumers, perhaps by adhering to the Consumer Protection From Unfair Trading Regulations? Blue Cross state some individual hobby breeders are making quite a lot of money, and one can reasonably assume that it is not being declared to HMRC. Would Blue Cross agree that the hidden economy is an issue for the licensed sector and that a significant number of purchases are being made through cash transactions?

#### **QUESTION 96**

**David Simpson:** Yes. I am on the third question. We will go to the next question. Defra has recently announced a proposal to reduce the threshold at which a breeding establishment needs to be licensed to three. Do you agree with the proposed number? Paula, you had touched on litters and stuff like that. Do you want to come in on that one?

**Paula Boyden:** Yes, if I may. Thank you. There is probably a little bit of variation in opinions, but certainly from a Dogs Trust perspective we feel that anybody breeding more than one litter ought to be licensed on the basis that one litter is an accident; however, more than one litter is likely to be a deliberate act. I take on board Angela's comment that it needs to be a process that is easy to manage. However, anybody breeding one litter should still be registered.

**Coalition Response:** Dogs Trust state that anybody breeding more than one litter ought to be licensed. Yet further state that anybody breeding more than one litter should be registered. There is a significant difference between licensing and registration. Could Dogs Trust clarify whether they are in favour of licensing or registration for anybody breeding more than one litter?

#### **QUESTION 97**

**David Simpson:** In your opinion should it be maximum litters per individual or household in a 12-month period?

**Paula Boyden:** It depends on the premises that one is talking about. It depends on what is at the premises: the availability of staff. It is very easy to get hung up on numbers of staff, but the important thing - you mentioned welfare - is that the welfare needs of both the breeding animals and progeny are being provided for. That has to be the critical factor as well as the facilities available at an individual premises.

**David Simpson:** Okay. Thank you.

**Coalition Response:** In answer to the question, Dogs Trust state it depends on the premises that one is talking about. Dogs Trust further state it is very easy to get hung up on numbers of staff, yet during the Animal Welfare (Breeding of Dogs) (Wales) Consultation, staff to dog ratio was a key factor for Dogs Trust.<sup>7</sup> As Dogs Trust did not answer the question, could they clarify whether it should be maximum litters per individual or household in a 12-month period?

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<sup>6</sup> Meeting the breeding levels as defined in the Breeding and Sale of Dogs Act, but operating without a licence.

<sup>7</sup><http://www.walesonline.co.uk/news/wales-news/dog-welfare-charities-hit-out-6455085>

## **QUESTION 98**

**Chair:** Defra is proposing to reduce it to three. Are you saying that it should be one?

**Paula Boyden:** We are suggesting that two or more should require licensing.

**Jeremy Cooper:** Yes, Mr Chairman. Certainly from our perspective it should be two or more. As Paula quite rightly says, one could be an accident - it does happen; two constitutes intent, and intent clearly is potentially a commercial angle. For us two would be the preference.

**Coalition Response:** Dogs Trust state that two or more should require licensing, yet in answer to question 96 they state anybody breeding more than one litter should be registered. There is a significant difference between licensing and registration. Could Dogs Trust clarify whether they are in favour of licensing or registration for anybody breeding more than one litter?

The RSPCA state they agree with Dogs Trust that two or more should require licensing. What research has been undertaken into profit margins from dog breeding, and is it the case that more breeding naturally means more profit? In the context of the enquiry 'Animal Welfare: Domestic Pets', could Dogs Trust and the RSPCA provide evidence showing welfare concerns associated with 'small scale' dog breeders?

## **QUESTION 99**

**Chair:** Who are you expecting to police this? It is all very well bringing in rules and regulations but it is making sure it is "policed", isn't it, half the time, that matters?

**Jeremy Cooper:** Enforced - managed.

**Chair:** That is right.

**Paula Boyden:** If I may, our suggestion would be that there be a central body of animal welfare inspectors, instead of putting that responsibility on local authorities. We know local authorities are being subjected to greater and greater cuts, so at the moment there may be some individuals where it may be one part of a portfolio of responsibilities where the individuals have no skills, knowledge or experience in animal welfare. In setting up a body that could provide those services, the licensing and the cost of inspection should make it self-funding, but it is very important that the body is not-for-profit, so that it is welfare that is top of the list, not profit.

**Jeremy Cooper:** It would also, Mr Chairman, need to take into account specific training so that they understand exactly what the remit and the welfare benefits and needs are, so they can provide the right service and support.

**Claire Horton:** Certainly Battersea has sent to the Committee a recent licensed breeding report that we did looking at what licensed breeders were doing across Great Britain. There are a surprising number of local authorities that have no licensed breeders at all in them but very high populations of puppies and dogs for sale. On the licensing question, the licences are ranging in price from £23 in Glasgow to £741 in Lambeth. Surprisingly there are no licensed breeders in Lambeth yet, as Battersea can testify, there are an awful lot of puppies in Lambeth and unwanted dogs.

There is a real challenge around policing it. Certainly fixed penalty notices are a way of enforcing and light touch. The inspectorate that we are talking about is about competent people who know what to look for - who are understanding where they are seeing a problem. Equally, in terms of registration one of the real benefits of registering every puppy that is bred, not just as a breeder but as a normal member of the public - and we will perhaps talk a little bit more about that - is the trail that then you have to follow, not only with microchipping but equally with things like online advertising. If you cannot sell a puppy without having a registration number, it makes it very difficult then to traffic these animals around and to work under the radar.

Equally there is a public education piece, which is about talking very seriously to the public, who really do not know or understand some of the issues that we are talking about, and making them aware of what is right and what is the wrong way to be seeking and finding a puppy.

**Coalition Response:** Dogs Trust propose a central body of animal welfare inspectors, instead of putting that responsibility on local authorities. Dogs Trust state the licensing and the cost inspection should make it self-funding. For a central body of animal welfare inspectors to be responsible for licensing anyone breeding two or more litters, and for this body to be self-funded through licence fees would require that licence fees be set at a level potentially higher than currently exists, or for those licence fees to be set depending on size of establishment. Could Dogs Trust confirm what costings have been done to show that a self-funded central body of animal welfare inspectors would be viable? Would Dogs Trust agree that setting licence fees at a level high enough to sustain a central body of animal welfare inspectors could penalise small scale breeders and encourage the industrialisation of dog breeding into large commercial establishments as has been witnessed in Carmarthenshire and Ceredigion?

The RSPCA state any licensing regime would need to take into account specific training, so that the licensing officers can provide the right service and support. Could the RSPCA confirm what costings have been done in relation to inspection visits, enforcement, prosecution, training etc. required for the licensing of anyone breeding two or more litters?

Battersea state that there are a surprising number of local authorities that have no licensed breeders at all, yet have a very high population of puppies and dogs for sale. Battersea cites Lambeth as having no licensed breeders, yet an awful lot of puppies and unwanted dogs. Could Battersea confirm that these 'awful lot of puppies' have originated from Lambeth, or have they been brought in for third party sales? Could Battersea provide evidence supporting their claims that the local authorities that have no licensed breeders, have a very high proportion of puppies and dogs for sale? Could it be assumed that certain areas of the country, for example urban areas such as London, do not provide the right environment for breeders who would fall under existing licensing requirements?

Battersea state that fixed penalty notices are a way of enforcing and light touch. Fixed penalty notices are costly to enforce and we know from our investigation into dog breeding in Wales following the introduction of the Animal Welfare (Breeding of Dogs) (Wales) Regulations that additional licensing requirements, and any other requirements/penalties associated with enforcement, do not equate to additional licensed breeders and additional compliance. Rather than there being an increase in the number of licensed breeders in Wales following the introduction of the new regulations – figures were estimated at an additional 500 breeders – there has been over a 4% reduction.<sup>8</sup>

Battersea state that making it a requirement to sell all puppies with a registration number, will make it very difficult to traffic these animals around. Could Battersea explain how a registration number would make it difficult for dealers to operate, when they would too be provided with a registration number, further legitimising their already legitimate trade?

Battersea highlight the importance of a public education piece to make them aware of what is right and what is the wrong way to be seeking and finding a puppy. Could Battersea clarify their position on third party puppy vending, and would they agree that one of the most effective ways of protecting the public would be through eliminating the most complex and low welfare route to market – licensed pet shops?

## **QUESTION 100**

**Chair:** That is right, and making sure you see it with the mother and all those issues, which we will probably talk about a little bit in a minute. It is interesting you make the point it is £750 to register. We do need to be conscious that if you make it very expensive people are not going to register, are they, and so therefore perhaps there should be more of a uniform approach? Some authorities would argue it costs more to register than others, but I suspect

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<sup>8</sup> Appendix: Figure 1

some are making sure that people do not register in that particular area because it is so expensive- the point that you made.

**Steve Goody:** It is an interesting point, Chairman, because if you look at the scale, particularly of some of the larger scale breeders that we were talking about earlier, in terms of the revenue that they are generating on an annual basis, to be frank £750 for a license is very small beer.

**Chair:** It depends on what sorts of dogs you have bred and are breeding, and it depends on whether it is something you will carry on doing or whether it is a one off breeding of that particular dog. It is a fair point.

**Coalition Response:** Blue Cross state in terms of revenue that breeders are generating on an annual basis, £750 for a licence is very small beer. In response to Question 91, Blue Cross state they're in favour of a more simplistic form of registration. Could Blue Cross clarify whether they are in favour of licensing or registration? Do Blue Cross agree with the Chair that "we do need to be conscious that if you make it very expensive people are not going to register", or that we could potentially see a reduction in the number of puppies bred by high welfare, low volume home breeders and an increase in high volume, low welfare commercial breeders?

### **QUESTION 101**

**Simon Hart:** David mentioned in his earlier question the welfare problems with unlicensed premises. Do you think it is fair to say there is much of a distinction between the welfare standards in unlicensed premises and the welfare standards in licensed premises? Do we have any way of measuring that? If you have 200 breeding bitches in an unlicensed premises, is that significantly worse than 200 breeding bitches in a licensed premises?

**Steve Goody:** It is a very interesting question, Chairman. One has to assume that the standards of welfare in a licensed premises- if a local authority is doing its job properly, with the appropriate level of resource that sits behind that- are potentially going to be better than those standards in an unlicensed premises, if only for the reason that you do not know what they are because nobody is looking at it.

There is a really important point here you have to consider around scale. There is an assumption that is often made that says: if it is a large-scale premises breeding lots and lots of dogs, it must be bad, mustn't it? That is probably not necessarily the case. If you look at the farming analogy, where you have large-unit farm livestock facilities, quite often the standard in those large units is better than in some of the smaller units. Potentially the same applies.

It is not necessarily about numbers. It is about the quality of the welfare and the management that sits behind the establishment in ensuring that it is licensed appropriately against a common standard. That is where the shortfall is.

**Claire Horton:** One of the biggest concerns is we know there are very large-scale premises that are licensed and have 200 or 300 bitches, and they will be licensed but they will not necessarily be working to the sorts of welfare standards that most people would expect. Many of them are licensed and there would be some questions around them, given some of the evidence that we have seen. There are large-scale commercial operators that work in not just one licensed premises but a network of other premises that may be unlicensed, where there are even more dogs that no one has seen.

There are significant breeders in certain parts of the country where you will have large-scale commercial activity. You will have also good breeders who will be producing commercially. You also have the Kennel Club assured breeder scheme, which covers- I am sure they will not thank me for saying this- commercial breeders perhaps breeding on a smaller scale, whose puppies will be very well socialised, very well cared for and have all the right standards. They will also come under some sort of licensing regime. The quality of care is extremely variable, but we know it is pretty poor in an awful lot of places.

**Paula Boyden:** The other challenge we have to bear in mind is that we are working with a very old piece of legislation. It predates the Animal Welfare Act. We know a lot more about things such as behaviour now than we did 15 years ago. Therefore, there is not a lot provision within that in the Act. As I previously said, there are probably

variations in terms of level of knowledge of those inspecting the premises as well. Those inspecting should really have good knowledge of animal welfare and what it means. It should not just be a tick-box exercise.

**Coalition Response:** Blue Cross state one has to assume that the standards of welfare in a licensed premises are potentially going to be better than those standards in an unlicensed premises. Blue Cross fails to take into account the motivation of the breeder, breeding dog numbers, type of premises and the effectiveness of local authority inspections. Some of the largest dog breeding establishments in Wales, and most inadequate in terms of animal welfare, are licensed, and licensed under the new regulations. Could Blue Cross provide evidence supporting their assumption that standards in unlicensed premises - either those falling outside existing licensing requirements or operating illegally - are lower than those in licensed premises?

Blue Cross use the farming analogy, where you have large-unit farm livestock facilities. The needs and requirements of farm animal species can be met under 'herd' management, the purpose of keeping and breeding farm animals bears no relation to the breeding of dogs.

Blue Cross state it is not necessarily about numbers. Could Blue Cross provide evidence showing it is possible to breed dogs in large numbers and maintain high standards of care, and still make enough profit to finance a viable business? Commercial breeders are competing against a large sector of the market who are operating on a non-commercial basis. Would Blue Cross agree it is possible to breed dogs in large numbers and maintain high standards of care, and still compete with the non-commercial sector of the market?

Battersea state there are large-scale commercial operators that work in not just one licensed premises but a network of other premises that may be unlicensed. Could Battersea provide evidence supporting this claim?

Dogs Trust make an excellent point that we know a lot more about things such as behaviour now than we did 15 years ago.

#### **QUESTION 102**

**Simon Hart:** By definition, you are highlighting the fact that the existing legislation is not fit for purpose.

**Paula Boyden:** No, it is not.

**Coalition Response:** Dogs Trust make an excellent point in highlighting the fact that the existing legislation is not fit for purpose.

#### **QUESTION 103**

**Simon Hart:** I do not want to put words in your mouth, but it is not offering the degree of protection needed to protect the offspring or indeed the mothers of these particular pups?

**Paula Boyden:** Quite. It needs bringing up to date to take into account the Animal Welfare Act. There are model licence conditions available, which is a step forward, but clearly the legislation itself needs to be looked at.

**Coalition Response:** Dogs Trust make an excellent point that the legislation itself needs to be looked at.

#### **QUESTION 104**

**Simon Hart:** One further question - or one further question in two parts, I should say. Do you subscribe to the view - I think you do, from the written evidence - that one relatively easy solution to this legislatively is to ensure that pups cannot be sold in circumstances where purchasers cannot see them with their mothers? That is a Defra recommendation, as far as we are aware, and I think all four organisations have signed up to that principle. Am I correct, for a start?

**Paula Boyden:** That is the ideal. If one goes back to WHO definitions, health is both physical and mental. Therefore, to see a pup with and interacting with its mum, to know that it has had that good start in life, is critical in having a puppy that is well socialised as it moves through its life.

**Coalition Response:** Dogs Trust confirm they subscribe to the view that one relatively easy solution to this legislatively is to ensure that pups cannot be sold in circumstances where purchasers cannot see them with their mothers. Dogs Trust state to see a pup with an interacting with its mum, is critical in having a puppy that is well socialised as it moves through life.

#### **QUESTION 105**

**Simon Hart:** As far as licensing is concerned, what is the barrier between where we are now and achieving that? It seems to me the perfectly sensible thing to do. I cannot think any purchaser would not want to do that and no legitimate breeder would want to bar people from that. What is the legislative blockage to achieving that?

**Steve Goody:** It would be quite difficult to legislate and regulate that in absolutely every circumstance a puppy would have to be seen in the presence of its mother. If you look at the welfare environment, for example, we are taking in litters of puppies from members of the public as unwanted, for whatever reason. We are quite happy to do that and find them good homes, but we will not necessarily then have the mother present.

**Coalition Response:** Blue Cross state that it would be quite difficult to legislate and regulate that in absolutely every circumstance a puppy would have to be seen in the presence of its mother. Could Blue Cross confirm that through this statement, they are stating they would rather see hundreds of thousands of dogs and puppies continue to suffer than look at a workable solution to this issue?

#### **QUESTION 106**

**Simon Hart:** Could we not exempt charities from the law?

**Steve Goody:** There could be some exemptions. The difficulty with creating exemptions is that that starts to create loopholes through which you can drive coaches and horses in legislation. We know that. Perhaps, a more appropriate way we could do it would be to develop statutory codes of practice that support the regulation and identify a requirement to see the puppy with its mother in every sense. That might be a more reasonable approach in regard to that particular situation. Ideally we are all singing from the same song sheet that says you should, wherever possible, see the pup in the presence of its mother.

**Coalition Response:** Blue Cross state that rather than charities being exempt from the law they would rather develop statutory codes of practice that support the regulation. Could Blue Cross explain why they would not support an exemption despite exemptions being written into existing legislation? Could Blue Cross provide evidence that statutory codes of practice have proved effective in other areas of animal breeding and selling? Blue Cross state they are all singing from the same song sheet in saying that, wherever possible, one should see the pup in the presence of its mother.

#### **QUESTION 107**

**Simon Hart:** Is that universally agreed?

**Paula Boyden:** Yes.

**Claire Horton:** Yes.

**Coalition Response:** Dogs Trust and Battersea agree that wherever possible, one should see the pup in the presence of its mother. The RSPCA did not answer this question and therefore did not state their agreement.

#### **QUESTION 108**

**Simon Hart:** The second part of the final question: is it also not fair to say there is no legislation ever passed in this place that is absolutely watertight? You are never going to catch everybody all the time. Would not moving toward that situation, not necessarily through codes of conduct but through the simple principles of the Defra code of practice that your charities have already agreed to, at least start the elimination process of some of these

substandard breeding establishments where the bulk of the problem lies? Is that not better than nothing to move in that direction? Is that something we should be looking at?

**Claire Horton:** It will probably start to take out a bit of the middle man situation in terms of puppies that are often taken away from mothers by dealers, who will then shunt them around the country to various pet shops. I clearly do not want to stray into areas we will talk about shortly, but there are some dealers who will take the mother or a mother and puppies. You are always going to get these workarounds, but you would certainly reduce the number of large-scale sales of puppies without mothers and certainly in pet shop premises, where you have large numbers of puppies without mothers or any sort of socialisation opportunity at all.

**Paula Boyden:** We just have to be mindful of the unintended consequences. I do not disagree with my colleagues at all. However, we are in a situation where we are not producing enough of the right sorts of puppies in the UK, which is why we have this influx from Eastern Europe. You may be aware of the quarantine pilot that we are running in conjunction with APHA down in Dover at the moment. 70% of those puppies are pugs, bulldogs and French Bulldogs. That is representative of the demand for these sorts of dogs in the UK. We just have to be mindful of that: that we need to work towards your suggestions; however, do it too quickly and folks will find another way of accessing puppies.

**Steve Goody:** The legislative route, Chairman, is not necessarily the only route that we ought to be exploring. There is also the education and public awareness route, which tends to get forgotten about quite often. The third sector and others, including Government, have a responsibility around that whole education and public awareness piece in a co-ordinated sort of way that starts to drive some of this positive welfare and responsible ownership messaging home to those individuals that are looking to acquire a puppy.

**Coalition Response:** Battersea agree that enforcing the requirement that puppies should be seen in the presence of its mother would certainly reduce the number of large-scale sales of puppies without mothers and certainly in pet shop premises.<sup>9</sup>

Dogs Trust state that the UK is not producing enough of the right sorts of puppies in the UK, which is why we have this influx from Eastern Europe. Could Dogs Trust provide evidence supporting this claim, specifically by detailing how many puppies were imported under TRACES and how many illegally imported puppies were identified in the years 2014 – 2016? Could Dogs Trust confirm how many puppies they are referring to when discussing their quarantine pilot – 70% as a figure of what total? Would Dogs Trust agree that the availability and comparative cheapness of imported puppies could be what is influencing buyer's purchasing decision, and not necessarily the fact the UK is not producing enough of the right sorts of puppies? Would Dogs Trust agree that the purchasing of a puppy is a non-essential purchase and does not warrant an automatic supply to the demand? Is it the position of Dogs Trust that meeting supply takes precedent over tackling impulse and irresponsible purchases, breed related disorders, health issues, and the suitability of a buyer?

#### **QUESTION 109**

**Chair:** Yes. I have just one further question on this. We are naturally looking at the Animal Welfare Act and its effectiveness. Is it the fact we are not doing enough inspections of these unlicensed premises or finding them? Is that the problem? Is it the Act itself that needs to change? Can we learn anything from what is happening in Wales and what Wales is doing as well? What we are taking evidence on today is where we can have a really positive effect. Do we need to change the Act or do we need to interpret the Act? Do local authorities and others need to interpret the Act in a different way? Which is it?

**Paula Boyden:** It is multifactorial. If we deal with the Wales situation first of all, they have revised their Breeding and Sale of Dogs (Welfare) Act. That is certainly welcome because they have put in suggestions about having socialisation programmes, having habituation programmes and environmental enrichment, which is one of the things we really need. There has been comment about the staff to dog ratio. I personally would not get too hung up on that, because

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<sup>9</sup> Appendix: Figure 2 - 4

the needs of individual dogs at individual stages in their lives are going to be very different. Clearly one needs staff that are well trained to care for the animals, so it ought to be looking at whether the welfare needs of the animals are being provided for rather than whether they have X number of staff to X number of dogs. That is quite a misnomer.

In terms of the Animal Welfare Act itself, there clearly is provision for officers to be appointed under the Act. You will know from Dr Fiona Cooke's research that very few local authorities have appointed anybody under the Act. Having read through some of her data, only 7% of local authorities have an individual who is dealing with companion animals on a daily basis. That is one option. However, local authorities are strapped. We do need to be able to utilise the Act, but that will take resources to do.

**Coalition Response:** Dogs Trust state we should not get too hung up on the staff to dog ratio. Yet, during the Animal Welfare (Breeding of Dogs) (Wales) Consultation staff to dog ratio was a key factor for Dogs Trust.<sup>10</sup> Dogs Trust refer to the habituation programmes and environmental enrichment introduced under the Animal Welfare (Breeding of Dogs) (Wales) Regulations. Our evidence shows that this requirement has been overlooked on licensing inspections undertaken since the introduction of these regulations, and such evidence has been presented to the Welsh Government.

#### **QUESTION 110**

**Chair:** We have to drill down on whether we need to change the Act or enforce the Act. Which is it? You are mainly saying greater enforcement, are you, or what?

**Steve Goody:** I think everyone at this table would agree that the Animal Welfare Act is a pretty decent piece of legislation. Compared with what preceded it, it is an excellent piece of legislation. The PDSA in their PAW report picked up that something like only 31% of the general public understood there was an Animal Welfare Act, let alone its impact in terms of the welfare of pet animals. Again, there is a body of work to be done in terms of promoting the Animal Welfare Act to the wider population in terms of the benefit that it bestows.

In terms of specifics apart from the enforcement issue, there are opportunities to improve it around some of the definitions, for example, and the duty of care from our perspective is a really important one. At the moment the Act talks to extent required by good practice, so there is an opportunity to consider some of the definitions contained within the Animal Welfare Act and tighten those up for the benefit of the welfare of pet animals from our perspective.

**Coalition Response:** Blue Cross make an excellent point that there is an opportunity to consider some of the definitions contained with the Animal Welfare Act and tighten those up for the benefit of the welfare of pet animals.

#### **QUESTION 111**

**Angela Smith:** I would add one more point. For me, the Animal Welfare Act was a really key piece of legislation that set standards for the first time in relation to animal welfare and so on. It is quite obvious it is the right time to look at it now after 10 years. I was on the Committee. It is 10 years later. The provisions in the Act are provisions that need to be used in relation to the legislation that currently applies to breeding and licensing. It is not the Act itself that governs breeding and licensing, it is the other two pieces of legislation that we all know about and whose names I cannot remember at the moment. That is where we need to focus our attention and where we need to update legislation, I would have thought, to reflect the standards in the Animal Welfare Act. Would you agree that it is about how we bring the provisions in the Animal Welfare Act to bear on standards in unlicensed and licensed breeding establishments?

**Claire Horton:** Taking Paula's point about the inspectors and the enforcement side of things, much of the Animal Welfare Act enforcement is left to the RSPCA. I do not want to speak for my colleague, but really without the RSPCA

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<sup>10</sup><http://www.walesonline.co.uk/news/wales-news/dog-welfare-charities-hit-out-6455085>

here doing what they do I am not so sure that there would be as much enforcement under the Animal Welfare Act as there ought to be.

**Coalition Response:** Battersea make an excellent point that much of the Animal Welfare Act enforcement is left to the RSPCA. Would Battersea agree that this is in part due to the fact the Local Authorities are not statutorily required to enforce it?

We support the view that the legislation governing breeding and selling requires updating to reflect, among other things, the standards in the Animal Welfare Act.

#### **QUESTION 112**

**Jim Fitzpatrick:** Good afternoon, everyone. Can we go back to imported puppies? Ms Boyden, you mentioned the pet travel scheme. Can you describe how the pet travel scheme is being exploited and perhaps what remedies there might be to prevent the abuse that exists?

**Paula Boyden:** Absolutely. We are finding there are clearly some breeds of puppies that are desirable in the UK. Those breeds are being bred in Eastern European countries, for example Hungary, Lithuania and Romania. The conditions are shocking. The provenance of the parents is not good. For example, I saw some papers not long ago of puppies where it had been a sibling mating. They are being transported by road across to the UK - a trip of some 40 hours - and then they are being brought into the country under the pet travel scheme, which is non-commercial movement rather than commercial movement.

The worry with that is that the passports are being falsified. The minimum age of entry to the UK should be 15 weeks. Frequently these puppies are coming in at eight and 10 weeks of age. They either have not been vaccinated against rabies but have been certified as such, or they have been given a half dose of vaccine but they are clearly not compliant with the rules of pet travel.

The challenge with that is that the sanctions are very small in terms of those individuals involved. Because dogs are considered chattels, the individuals can just walk away and say, "I do not want them." This is where we have become involved with the quarantine pilot. The other problem with that is these puppies that are eight and 10 weeks are then in quarantine until they are 15 weeks, which is a critical time for their socialisation and habituation. We are putting extra resource into trying to help these puppies so that they are well rounded when we can responsibly rehome them. Some of them are very sickly as well. We have lost a number of the puppies.

**Coalition Response:** Dogs Trust describe the conditions on Eastern European dog breeding establishments and the transporting that occurs to reach UK borders. Would Dogs Trust agree that this is the picture of commercial dog breeding in Eastern Europe, irrespective of whether or not the puppies reach UK borders, or how they travel across UK borders. Commercially bred Eastern European puppies imported legally under the Balai Directive does not improve the conditions where these puppies were bred, or the health and welfare of the breeding dogs and puppies.

Dogs Trust state the worry is that the passports are being falsified. Would Dogs Trust agree that the worry should not be with the passports, but with the welfare of the puppies.

Dogs Trust state the minimum age of entry for puppies into the UK should be 15 weeks. The age at which puppies can be imported, does not improve the conditions where these puppies were bred, or the health and welfare of the breeding dogs and puppies. Importing puppies at 15 weeks is still impacting upon the critical socialisation and habituation time.

#### **QUESTION 113**

**Jim Fitzpatrick:** A lot of these abuses came up in the Westminster Hall debate only four, five or six weeks ago. I suspect there is unanimity about what is happening. Is there a difference of opinion as to what to do? You have the pilot scheme and the recommendations about spot fines, about more enforcement, more vehicles being stopped,

etc. There is no silver bullet to this. It just means a lot more resourcing going in to the border checks. Are there some easy things that can be done to address the worst abuses to at least start closing the tap?

**Paula Boyden:** As you know, the rules at the moment for moving within Europe are that a dog is vaccinated and three weeks later it can travel. That three-week wait is purely to allow the rabies vaccine to stimulate the immune system. Whilst I am sure you know rabies can have a very long incubation period, most cases will present between three and eight weeks post infection. Make that wait at least eight weeks.

The difference between a 15-week-old puppy and a five-month-old puppy is quite perceptible. There is a lot of subjectivity at the moment. Is this puppy 12 weeks? Is it 10 weeks? However, there are big differences there, and it would wipe this market out overnight. That would be the simple thing, but I appreciate we are talking about EU law.

**Coalition Response:** Dogs Trust recommended increasing the wait to at least eight weeks as a solution to ‘address the worst abuses to at least start closing the tap’. Would Dogs Trust agree that it would take considerable resources to enforce, and would they further agree that there could be a market for older puppies as there is little difference - to the untrained eye - between a 15 week old puppy and a five month old puppy? Would Dogs Trust agree that the simplest, quickest and most cost effective solution would be to eliminate the route to market, that is, to prohibit the sale of puppies without their mothers present. Currently, the only legal outlet for imported puppies is through a licensed pet shop – as defined under the Pet Animals Act 1951. Let us note the progress being made in Belgium, where Eric van Tilburgh (Head of the Animal Welfare Division of the Flemish Government) noted that Belgium has banned the sale of imported dogs/cats as well as the online listing of authorised breeders.<sup>11</sup>

#### **QUESTION 114**

**Jim Fitzpatrick:** One of the other things that came up in the Westminster Hall debate was about communication between European Union governments. You were talking about the “enforcement agencies there” and the “veterinary agencies there”. Is there evidence of much of that taking place, or are the best efforts of the UK Government not being responded to by Romania, Lithuania and so on?

**Paula Boyden:** Certainly off the back of the two investigations that Dogs Trust undertook our chief veterinary officer has written to his counterparts in those countries involved. Certainly sanctions were taken in Lithuania. The first time, one of the vets got a slap on the wrist. The second time it happened the Lithuanian Government decreed that only Government appointed vets can complete the passport to try to wipe this out, because the chap was up to his same tricks. Speaking as a vet, the disappointing thing for me is if I had done that in the UK, I would have been struck off, and he got a €50 fine, so there are differences there.

**Coalition Response:** Dogs Trust highlight the ineffectiveness of sanctions in other countries, they refer specifically to the Lithuanian Government. Would Dogs Trust agree that rather than relying on other governments to control animal welfare and trafficking, the most effective solution would be to eliminate the route to market here in the UK, that is, to prohibit the sale of puppies without their mothers present. Currently, the only legal outlet for imported puppies is through a licensed pet shop – as defined under the Pet Animals Act 1951. Would Dogs Trust further agree that eliminating routes to market throughout Europe would have the most impact on the numbers of breeding dogs and puppies?

#### **QUESTION 115**

**Chair:** Under the pet travel scheme, are there limits to how many you should be able to bring in?

**Paula Boyden:** Under the pet travel scheme as an individual you can bring in up to five dogs. Again, this is what we have been trying to do, working with APHA, Defra and Trading Standards. It is not normal activity for somebody to go out and buy themselves five 15-week-old puppies. That is where the flag should go up to say, “Let us look at this a little bit more.” That is starting to happen. It is not robust enough at the moment. It is very much depending on the individuals that we are dealing with, but it is starting to go in the right direction. Clearly we are happy to be involved

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<sup>11</sup><http://carocat.eu/conference-welfare-of-dogs-and-cats-involved-in-commercial-practices/>

with the quarantine pilot, but we are not dealing with the root cause of the problem, and something like a change in the legislation would make a significant difference.

**Coalition Response:** Dogs Trust state they are happy to be involved with the quarantine pilot, but that we are not dealing with the root cause of the problem. Would Dogs Trust agree that the root cause of the problem is that it is legal for puppies to be brought into the UK and sold commercially?

#### **QUESTION 116**

**Chair:** There should be an argument, surely, for either one or two puppies to come in under the scheme, and then if you wanted to bring in more, you had to have a very good reason for doing so. Like you say, it is very unusual that anybody would go out and buy five puppies. They are obviously going to sell them again, aren't they?

**Paula Boyden:** Quite. The other thing with that is we also have to look at the Balai directives and if this is a commercial movement. At the moment if you are travelling commercially there are no checks at the port and then the puppies have to stay at the point of destination for 48 hours to allow APHA inspections, but they are no more than 5% of consignments coming through. That needs to be tightened up; otherwise you are just moving the problem to another route.

**Coalition Response:** Dogs Trust highlight the issues with commercial movement of puppies. We are in receipt of figures detailing the number and size of consignments under TRACES. Could Dogs Trust provide similar figures for dogs travelling under the Pet Travel Scheme, together with a breakdown of the size of consignments, breeds of dog and whether the dogs are adult dogs or puppies? Would Dogs Trust agree that more data needs to be made available to policymakers?

#### **QUESTION 117**

**Jim Fitzpatrick:** I forgot to ask: at the Westminster Hall debate, one of the concerns raised was about the pilot scheme at Dover and the information being shared by the immigration authorities with your people. Has that improved? Is that still difficult in terms of identifying exactly what is being done? At that time, you were just being a receptacle for those found as opposed to being more involved in identifying how the scheme operated, how many inspections were being undertaken, how many dogs were being found and so on.

**Steve Goody:** It is still a frustration. Particularly we want to be able to evaluate what we are doing. We do not need names and dates. I understand the authorities can deal with that. However, knowing where these puppies are coming from would help us to build up a picture, and that is not happening, so we still need better communication. We are starting to have regular catch-ups with APHA, but there is still very much a long way to go with that.

**Jeremy Cooper:** To add on to the answer, Mr Chairman, have the Committee seen this recent publication? In the back it gives a number of recommendations in terms of answering the questions, such as transferring the checking of the PETS system to border controls rather than being left to the ferry companies etc., certainly more spot checks and those sorts of things, centralised databases and so on, just to give further measures in terms of putting a lid on that.

**Coalition Response:** Would Blue Cross and the RSPCA agree that it takes considerable resources to monitor and control the importation of dogs? Would Blue Cross and the RSPCA agree that the simplest, quickest and most cost effective solution would be to eliminate the route to market, that is, to prohibit the sale of puppies without their mothers present. Currently, the only legal outlet for imported puppies is through a licensed pet shop – as defined under the Pet Animals Act 1951.

#### **QUESTION 118**

**Chair:** It is not necessarily just ones coming in on the pet travel scheme. Of course, a lot of these people are coming through very late at night and various different times when they know very well that there is very little inspection going on, and that is an issue that we have to deal with as well. It is all very well having the theory - you are quite right in your document - but we need to ensure we have people on the ground inspecting at the time.

**Claire Horton:** Mr Chairman, that is one of the key points. We know when these people are coming through, we know how they are coming through, we know what they are coming through in and we know the repeat offenders, who will keep coming back because the penalties are so small. We do need to be aligning our resources accordingly to be at the ports and looking for these people at the times that they do come through - Friday nights, weekends, etc. I am not sure we are quite at that level yet.

**Jeremy Cooper:** The deterrent also needs to be strong enough.

**Coalition Response:** Battersea state 'we' know when these people are coming through, we know how they are coming through, we know what they are coming through in and we know the repeat offenders. If this is the case, could Battersea confirm why this information is not passed to the relevant border patrols so that these people can be apprehended before they reach their end destination within the UK. Could Battersea detail how many puppies were imported under TRACES and how many illegally imported puppies were identified in the years 2014 – 2016? Would Battersea agree that the most effective solution would be to eliminate the route to market, that is, to prohibit the sale of puppies without their mothers present? Currently, the only legal outlet for imported puppies is through a licensed pet shop – as defined under the Pet Animals Act 1951.

The RSPCA state the deterrent also needs to be strong enough. Could The RSPCA elaborate on this statement and provide specifics on how they would strengthen the deterrent?

#### **QUESTION 119**

**Chair:** Customs and others could be changing the ports and times at which they are inspecting - late at night and what have you - so that those that are bringing them through do not know exactly when those inspections are going to take place. It would be lovely to have 100% inspections everywhere, but in reality we are not going to get that. However, in practice if we could do a lot more spot checks when the criminal element does not know they are going to happen, we could perhaps catch a lot more.

**Paula Boyden:** It is intelligence led as well: getting the various agencies to talk to each other.

**Chair:** The pet passport is a legal loophole in a way, whereas I am probably taking the argument a bit wider, which we will deal with, but thank you.

**Claire Horton:** The NGOs, particularly the RSPCA and Dogs Trust, are offering to work directly with local government agencies and ports and APHA and such. There is a real opportunity there to have industry working together with Government to fix a problem and to address a problem. There just needs to be a little bit more willingness to engage and to share intelligence and to work together.

**Coalition Response:** Battersea states the NGOs, particularly the RSPCA and Dogs Trust, are offering to work directly with local government agencies and ports and APHA and such. Would Battersea agree that the importation of puppies is putting unnecessary pressure on NGOs, local government agencies, ports and the APHA, when there is a simple solution and that would be to eliminate the route to market, that is, to prohibit the sale of puppies without their mothers present? Currently, the only legal outlet for imported puppies is through a licensed pet shop – as defined under the Pet Animals Act 1951.

#### **QUESTION 120**

**Chair:** You believe at the moment we are not sharing this intelligence well enough. Is that a fair point?

**Claire Horton:** No, we are not - not as well as we might. We are better than we have been. Everything moves slowly and we understand that. There are lots of complications and everybody is very busy. However, when we have a key issue that we can and are willing to help with, there are opportunities we should be grasping and doing a little bit more cross agency working on.

**Coalition Response:** Battersea states in relation to the importation of puppies, and the sharing of intelligence, there are lots of complications and everybody is very busy. Would Battersea agree much of the complications and time

constraints would be eliminated if the route to market was eliminated, that is, to prohibit the sale of puppies without their mothers present? Currently, the only legal outlet for imported puppies is through a licensed pet shop – as defined under the Pet Animals Act 1951.

### **QUESTION 121**

**Angela Smith:** It would be interesting to look at the links with organised crime around puppy smuggling as well. My first question is very similar to the one I asked at the end of the other session, which is about the Pet Animals Act 1951 - the Act I could not remember the name of. Blue Cross have described that legislation as thoroughly outdated, so can you please elaborate on that for the benefit of the Committee?

**Steve Goody:** The Pet Animals Act was enacted back in 1951, more than half a century ago. Quite clearly we live in a very different time and a very different age. Quite particularly, apart from everything we have discussed around the growing phenomena of large-scale commercial and increasing small and individual hobby breeders, we have seen the phenomenon of the internet. Quite clearly a lot of the selling of dogs, puppies, cats and other animals, but dogs and puppies quite particularly from the perspective of what we are discussing today, is done across the internet and online. Quite clearly the Pet Animals Act 1951 provides no safeguarding for those animals that are being sold.

**Chair:** We will talk about online in a minute, if you do not mind, please.

**Steve Goody:** However, there is obviously an opportunity here to review the 1951 Act, in terms of the sourcing of, the sale of and the controls in place for pets that are being sold through licensed premises. Without wishing to drive the commercial sale of dogs, and puppies quite particularly, underground, there is a case to be made - whilst mindful of the concerns that we have around licensing, enforcement, continuity of how that is applied, and the training and resources that sit behind it - for an outright ban of the sale of dogs and puppies through pet shops until such time, at least, as some of those controls are put in place. I accept that we are going to be talking about online sales specifically, but those would be some of the key issues that we would like to consider as part of a review of the 1951 Act.

**Coalition Response:** Blue Cross state clearly a lot of the selling of dogs, puppies, cats and other animals, but dogs and puppies quite particularly from the perspective of what we are discussing today, is done across the internet and online. Would Blue Cross agree that this is a misleading and inaccurate statement if they are referring to online classifieds – PAAG members for example – as no selling takes place on these website, they are merely a form of advertising medium – no different to cards in shop windows or advertisements in newspapers. The actual process of online selling, that is, an online shopping cart facility is an altogether different issue. Could Blue Cross provide evidence showing the number of puppy sellers, online classifieds and websites offering the facility to purchase online, that is, via an online shopping cart facility? All online activity involving the selling of animals is already covered under existing legislation – either the advertiser is licensed, or they do not fall within existing licensing requirements, or they fall within licensing requirements but are operating illegally. Online advertisements or any selling done online, are not separate entities they form part of existing breeding and selling processes and legislation.

Blue Cross state the Pet Animals Act 1951 provides no safeguarding for those animals that are being sold. Could Blue Cross clarify where in the Pet Animals Act 1951 there is no safeguard for those animals being advertised online or sold via an online shopping cart facility?

Blue Cross state they do not wish to drive the commercial sale of dogs, and dogs quite particularly, underground. Could Blue Cross clarify the meaning of the term ‘underground’ in the context of their statement? Would Blue Cross agree that the majority of the general public would not actively seek out an underground industry, or support an industry that is not supported by law, particularly where companion animals are concerned.

Blue Cross state they would support the sale of puppies without their mothers present, that is, the selling of puppies by pet shops, providing there were sufficient controls in place. Could Blue Cross confirm what they would deem to be sufficient controls?

## **QUESTION 122**

**Angela Smith:** On the basis of what you have just said about pet shops, Steve, I would like to put the question to both you and Claire, and any other members of the panel who want to comment. You have just confirmed, Steve, that you would support a ban on the sale of puppies and kittens in pet shops, and I think, Claire, Battersea have said exactly the same. Can you elaborate on that, and tell us what improvements you think it would bring?

**Steve Goody:** In terms of improvement, it is true that there are fewer and fewer licensed pet shops that are selling dogs, cats and kittens, but they are still out there. One of the concerns that we have, particularly around pet shops and the pet trade, given the current licensing requirements and the regime that sits behind that, is that it is quite easy - without having to demonstrate any core competencies around pet care, keeping and knowledge - to get a pet shop licence.

The other issue, quite significantly, is that any of us could walk into a pet shop selling dogs and puppies, and pretty much hand over whatever you are going to hand over and walk out of the store with a dog or a puppy under your arm. Very little information is provided at point of sale to support the consumer when they are trying to make a responsible choice around what is going to be a 15 to 20 year commitment in relation to that particular dog or puppy.

**Coalition Response:** Blue Cross state there are fewer and few licensed pet shops that are selling dogs, cats and kittens, but they are still out there. Could Blue Cross provide evidence supporting this statement? Our own research contradicts the claims made by Blue Cross.<sup>12</sup> Of particular note, nine new licences permitting the sale of puppies have been granted in the last three years - five to dealers and four to hybrid sellers.

Blue Cross state that any of us could walk into a pet shop selling dogs and puppies, and pretty much hand over whatever you are going to hand over. Blue Cross have focused, in this statement, on retail pet shops, but the Pet Animals Act 1951 is very clear in its definition of a pet shop 'the carrying on at premises of any nature (including a private dwelling) of a business of selling animals as pets, and as including references to the keeping of animals in any such premises as aforesaid with a view to their being sold in the course of such a business, whether by the keeper thereof or by any other person'. Would Blue Cross agree that to focus purely on retail pet shops is potentially misleading. Blue Cross state very little information is provided at point of sale to support the consumer when they are trying to make a responsible choice. Would Blue Cross agree that the most complex, confusing and most open to welfare issues is the pet shop trade, that is, third party puppy vending? Would Blue Cross further agree that one of the easiest ways to assist the public in making a responsible choice is to remove the most complex and confusing puppy selling route?

## **QUESTION 123**

**Angela Smith:** Could you not argue, perhaps playing devil's advocate, that if you did put the arrangements in place for making sure buyers were aware of their responsibilities and so on, it would become a legitimate practice?

**Steve Goody:** Yes, you could. In terms of us answering the question now posed, about whether you should ban the sale of dogs, puppies, kittens etc., through pet shops, that is certainly predicated on the current situation. Possibly, if you were able to demonstrate that there was a robust process that sat behind the licensing and the enforcement piece, it might be a more legitimate outlet. The analogy for that, potentially, could be the welfare sector, where you have welfare organisations like Blue Cross, the RSPCA, Battersea and the Dogs Trust that are rehoming puppies in a legitimate way based on the processes that sit behind the transference of ownership of those particular animals. That, significantly, is what is missing from the pet trade at the moment from our perspective.

**Claire Horton:** To add to what Steve has said, there is some confusion about the pet shop licence, as to whether or not you have to have a physical pet shop or whether you can sell pets as a dealer and have a pet shop licence for

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<sup>12</sup> Report: Licensed Third Party Puppy Vending in GB 2016

that. That can be a problem, and that can mean that animals can be sold from a private dwelling. Some of those animals could be sold properly and well, and with mothers, whereas pet shops are slightly more tricky.

Equally, the question around the five freedoms, giving the puppies the right environment in a pet shop to receive the necessary care, attention and socialisation, is critical. Enforcing that pet shops are operating in that way is really important. Whether we are talking to members of the public or to pet shop owners themselves, we need to ensure there is enough education and information around the animal, the care of the animal and what people are taking on, so that owners, potential owners and the carers and sellers of those animals are properly catering for their needs when both keeping them and buying them.

**Coalition Response:** Blue Cross state that if arrangements were put in place for making sure buyers were aware of their responsibilities and so on, selling puppies through pet shops would become a legitimate practice. Blue Cross state if a robust process, that sat behind the licensing and the enforcement piece, were to be demonstrated then pet shops might be a more legitimate outlet. Would Blue Cross agree that there are already model conditions in place and available to local authorities, as well as welfare legislation and breeding and sale of dogs legislation – albeit that some of the legislation is not fully fit for purpose? Could Blue Cross provide evidence that robust processes would make the selling of puppies through pet shops a more legitimate practice? Our evidence shows, for example, that only 33% of 48 local authorities who provided evidence of which version of pet shop licence conditions they were using, were using the latest Chartered Institute of Environmental Health Model Conditions for Pet Vending Licensing (2013).<sup>13</sup> Do Blue Cross support the position that is acceptable for buyers to never see the conditions in which their puppy was bred, to never see their puppy's mother and for their puppy to potentially have travelled hundreds of miles across the UK at an age when their immune systems have not fully developed? Do Blue Cross accept that by further legitimising the pet shop route, they are condoning the situations mentioned in our previous question?

When detailing the proposed more robust process, Blue Cross use the analogy of the welfare sector. Do Blue Cross agree that there is a significant difference between the selling of puppies by pet shops and the rehoming of puppies by welfare organisations. Do Blue Cross agree that the processes, reasons, motivation and starting point are entirely different, and are in fact – poles apart. Do Blue Cross it should be less about the sales process and more about the production and the incentives that lie behind it?

Battersea state there is some confusion about the pet shop licence, as to whether or not you have to have a physical pet shop or whether you can sell pets as a dealer and have a pet shop licence for that. The Pet Animals Act 1951 is absolutely clear on the definition of a pet shop 'the carrying on at premises of any nature (including a private dwelling) of a business of selling animals as pets, and as including references to the keeping of animals in any such premises as aforesaid with a view to their being sold in the course of such a business, whether by the keeper thereof or by any other person'. Essentially, anyone selling puppies they have not bred themselves, is required to have a pet shop licence irrespective of how and from where they run their pet shop business. Battersea state that some of those animals could be sold properly and well, and with mothers, whereas pet shops are slightly more tricky. Could Battersea clarify under what circumstances, in the context of pet shop licences, could puppies be sold properly and well? Would Battersea agree that in the instances where puppies are sold under a pet shop licence with their mother present, this would mean that the mother would have to have been moved during weaning, during a time when mothers and puppies are most vulnerable, susceptible to illness and in need of recuperation?

Battersea state – in relation to the five freedoms of the Animal Welfare Act – that giving the puppies the right environment in a pet shop to receive the necessary care, attention and socialisation, is critical. Could Battersea clarify why they are now discussing giving puppies the right environment in a pet shop to receive the necessary care, when previously during this session they stated puppies should be sold with their mothers – something that is impossible certainly in a retail pet shop environment? Could Battersea clarify how they would ensure the five freedoms are being met in a pet shop environment?

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<sup>13</sup>Report: Licensed Third Party Puppy Vending in GB 2016

Battersea state it is really important to enforce that pet shops are operating in that way. Could Battersea provide evidence of the incentive for compliance? Battersea state the need to ensure there is enough education and information around the animal is paramount, as is the need to provide information on how to care for the animal and what people are taking on so that owners, carers and the sellers are properly catering for their needs when both keeping them and buying them. Would Battersea agree that all four members of the panel provide extensive information to puppy buyers, and that the general public are more informed than ever on the process of buying a puppy and the pitfalls they may encounter along the way. Would Battersea agree that a fundamental way we can help buyers is to remove the most complex and confusing element of the trade, that is, the sale of puppies by pet shop licence holders.

#### **QUESTION 124**

**Simon Hart:** Steve, you mentioned the reduction in the number of outlets selling, didn't you? Does that equate to a reduction in the number of animals being sold, or is it just a larger number of animals going through a smaller number of outlets?

**Steve Goody:** It is a smaller number of animals going through physical outlets, and that is partly because we have seen an increase in the numbers being sold through other outlets, such as online.

**Coalition Response:** Blue Cross state it is a smaller number of animals going through physical outlets. Could Blue Cross clarify the term 'physical outlets' in the context of this statement, particularly as all pet shop licence holders must register under a physical premises? Could Blue Cross provide evidence supporting their claim, particularly the claim that they have seen an increase in the numbers being sold through other outlets, such as online? Would Blue Cross agree that this is a misleading and inaccurate statement if they are referring to online classifieds – PAAG members for example – as no selling takes place on these website, they are merely a form of advertising medium – no different to cards in shop windows or advertisements in newspapers. The actual process of online selling, that is, an online shopping cart facility is an altogether different issue. Could Blue Cross provide evidence showing the number of puppy sellers, online classifieds and websites offering the facility to purchase online, that is, via an online shopping cart facility?

#### **QUESTION 125**

**Angela Smith:** Just to try to grasp, for the Committee's record, exactly what you are saying on puppies in pet shops, are you both effectively saying that this practice could be allowed if the circumstances are right, but it is always in the context of a thorough reform of the existing regulations relating to licencing and sale?

**Steve Goody:** We would like to see that thorough reform of the regulation and the processes that sit behind it, and then we would be prepared to consider reviewing our position on the sale of puppies through pet shops.

**Coalition Response:** Blue Cross state that were they to see a thorough reform of the regulation and the processes that sit behind it, then they would be prepared to consider reviewing their position on the sale of puppies through pet shops. The only legal route to market for imported puppies is through pet shops. Some of the largest commercial dog breeding establishments in the UK – specifically Wales – with some of the lowest welfare standards (puppy farms by definition) do not sell to the public, instead rely on selling their puppies to pet shops.<sup>14</sup> Many of these establishments have been licensed and inspected under the new Animal Welfare (Breeding of Dogs) (Wales) Regulations. Would Blue Cross agree that there are already well constructed model conditions in place and available to local authorities, as well as welfare legislation and breeding and sale of dogs legislation – albeit that some of the legislation is not fully fit for purpose? Could Blue Cross clarify what level of thorough reform, and what particular conditions and changes under this reform, they refer to when stating they are prepared to consider their position on the sale of puppies through pet shops? Could Blue Cross confirm, what elements of the third party puppy vending chain, they find acceptable and open to thorough reform?

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<sup>14</sup> Appendix: Figure 2 - 4

### **QUESTION 126**

**Angela Smith:** That is helpful. Claire, you would say the same.

**Claire Horton:** Exactly.

**Coalition Response:** Battersea supports the position of Blue Cross. Would Battersea agree that it is of grave concern that a welfare organisation founded in 1860 for the purpose of providing a temporary home for lost and starving dogs, has so little grasp of the critical requirements of rearing puppies that they cannot recognise that it is impossible to sell puppies appropriately through pet shops, without adversely affecting their welfare?<sup>15</sup>

### **QUESTION 127**

**Angela Smith:** Jeremy, you are very new to the role, so welcome. In your report, you note that there is a loophole that allows commercial puppy dealers to sell puppies through private premises. Can you perhaps talk about that a little further, and explain it a little further for us, and why you are so concerned about it?

**Jeremy Cooper:** The legislation is slightly out of date, as we have discussed. It is about the whole supply chain; when we look at the whole chain of breeder, dealer, wholesaler, brokers, and the internet - which we touched on - there is a real similarity to my previous role. I came from the Freedom Food scheme, where the whole supply chain around the farm animal is from farm to fork. The whole process, right the way through, is licensed and regulated, and obviously everyone has a vested interest, from the farmer to the end user - who is a key stakeholder and could be a retailer or a food service sector, because of brand issues - and also there is the welfare side.

It was a surprise to me, when I started coming into this, to find that there was a breakdown and a disconnect. For us, the point I would make is the licence on the activity, rather than the establishment, because that is what you want, all the way through. Does that make sense?

**Coalition Response:** The RSPCA state they were surprised to find that there was a breakdown and a disconnect, and that they would licence on the activity, rather than the establishment. The RSPCA have failed to grasp that the licence is on the activity – in the context of this question – it is on the activity of selling animals under a pet shop licence. The licence is also on the establishment because that is where much of the activity takes place.

Would the RSPCA agree it is possible to exert a far higher degree of enforcement on the farming industry and there is a far higher incentive to do so? Would the RSPCA also agree that there is more visibility and transparency in this sector and an historical precedent for regulation? There is much stronger incentive for compliance throughout the chain and not dependent only upon strict enforcement – the general public are far stricter about the origin of the food they put on their plate than they are about the origin of their pet. The whole farming process is a world apart from dog breeding in every respect – the only connection is that animals are involved.

### **QUESTION 128**

**Angela Smith:** Okay. What do you think is the overall impact on welfare standards of this practice?

**Jeremy Cooper:** By not having it?

**Angela Smith:** Yes.

**Jeremy Cooper:** This is where we have the disconnect and the lack of consistency. An establishment having a licence does not necessarily mean that it is bad, or vice versa, but certainly if it was licensed all the way through, you have a better opportunity of regulating it and auditing it. You can get better data and check that the welfare standards are being maintained.

**Coalition Response:** The RSPCA state they are in favour of licensing throughout the entire process as a way of

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<sup>15</sup> Appendix: Science Papers Supportive Evidence

providing a better opportunity of regulating and auditing it. Would the RSPCA agree that licensing the entire process would add further pressure on resources and could potentially result in an even greater level of non-compliance?

#### **QUESTION 129**

**Angela Smith:** Are there any other comments on this one from anybody else on the panel?

**Paula Boyden:** We all think of pet shops as somebody with a shopfront, but as Claire alluded to there are people who are breeding and selling from private establishments: establishments where you do not have a shopfront. Those establishments still need a pet shop licence. Just because they do not have a shopfront does not mean to say that they are not undertaking the same activity, and we need to be mindful of that. This is, perhaps, where things are going. As Steve said, we have online selling, so you do not actually need a shopfront. How many of us buy things online? That is the challenge.

**Jeremy Cooper:** That goes back to my point about the activity, rather than the premises.

**Claire Horton:** When you are talking about the entire industry, the supply chain, you are talking about what best estimates suggest is between a £100 million and £300 million trade in puppies in the UK, every year. That is as big as the turkey markets, I am told. That is a huge industry, and you have producers of puppies that are often very good producers, producing a quality animal to have a long and happy life, going through the right processes: properly licensed, producing a properly looked after animal, properly sold.

You then have the opposite end of the spectrum, where you have licensed and unlicensed properties producing pretty poor animals: pretty poor quality, very bad breeding issues, where the producer is not thinking about the breeding stock they are using. There are often breeding bitches involved in this that will be shut away for many years and never see the light of day. You have a very large number of animals bred, produced, and sold into the market - often with health problems and considerable socialisation issues - that are causing significant problems not just for themselves but for the people who are buying them.

The consumer protection issue is one problem; the HMRC tax question is another, and then there are the ethics of the supply chain from breeding to market. We really need to get on top of that, and there are so many flaws in the legislation, from licensing through enforcement and to sale, that do not protect these animals. We need to close this up, and I hope we will start to move on that from here.

**Coalition Response:** Could Dogs Trust further elaborate on this statement and clarify the point they are making, particularly in relation to their statement 'that is the challenge.'? As previously stated, the actual process of online selling, that is, an online shopping cart facility is an altogether different issue to the advertising of dogs and puppies online via classifieds such as those signed up to PAAG. Would Dogs Trust agree that many of those sellers advertising online are pet shop licence holders and the fact they are advertising their wares online is irrelevant to the sales process?

Battersea state there are often very good producers, producing a quality animal to have a long and happy life, going through the right processes: properly licensed. Battersea appear to be inferring that the only good producers of puppies are licensed. Could Battersea clarify their position?

Battersea highlight the opposite end of the spectrum, where you have licensed and unlicensed properties producing pretty poor animals: pretty poor quality, very bad breeding issues, where the producer is not thinking about the breeding stock they are using. Could Battersea confirm what proposals they have put forward to improve the 'opposite end of the spectrum.'?

#### **QUESTION 130**

**Angela Smith:** What I am hearing, just to conclude, Chair probably is another argument in favour of registration, even for one litter and obviously for more than that. Supply train traceability seems to be the key issue.

**Jeremy Cooper:** Absolutely.

**Claire Horton:** Absolutely.

**Angela Smith:** If you can have traceability in the steel industry, you ought to be able to have it in terms of animal welfare standards.

**Claire Horton:** Absolutely.

**Chair:** It is not only an issue for the welfare of the animal; it is also almost an issue for the welfare of the family, because very often these puppies get bought by a family, perhaps with children. They are so fond of this puppy, and then the puppy turns out to have lots of diseases. That is a real problem, as well. It is not only protecting the animal; it is also protecting people as far as practicable.

**Coalition Response:** Could The RSPCA and Battersea confirm whether they are in favour of licensing or registration for anyone breeder more than one litter, as licensing and registration are two entirely different processes?

#### **QUESTION 131**

**Simon Hart:** Is there a figure above which it is never possible to meet the welfare standards that we would expect?

**Claire Horton:** In terms of numbers?

**Coalition Response:** No comment required.

#### **QUESTION 132**

**Simon Hart:** In terms of the size of a breeding establishment. I read in the brief that we were sent that I have 81 of these in just one county. I have the top of the league, as far as these things are concerned, and they do cause considerable local concern. Are we wasting our time in that respect? Can those standards ever be met properly?

**Claire Horton:** You could have 100 or 1,000 breeding bitches and puppies produced in one property if you had enough people, enough land, and enough resource to be able to cater for their needs appropriately. You would have to do that across the board, wholesale. It is a huge undertaking. If you have that kind of money, that number of people and you are open to unannounced inspections, you could theoretically produce happy, healthy puppies from healthy, happy mums.

**Coalition Response:** Battersea state you could have 100 or 1000 breeding bitches and puppies produced in one property if you had enough people, enough land and enough resource to be able to cater for their needs appropriately. Would Battersea agree that a question to ask would be, could a premises producing 1000 breeding bitches and puppies meet the appropriate needs and still operate as a viable business, or would there reach a point economically where standards would have to be compromised?

#### **QUESTION 133**

**Simon Hart:** The key word being "theoretically".

**Claire Horton:** Theoretically. You can have five bitches and still have them in appalling conditions, and we see that at Battersea all the time. We will have one bitch come in with her puppies, and they will be in a terrible state. It is about individuals; it is about resource; and then it is about the framework of law that they work within.

**Coalition Response:** No comment required.

#### **QUESTION 134**

**Ms Ritchie:** I would like to move on to the issue of online sales. Could I apologise for being late? We have received a great deal of evidence expressing concern over the sale of dogs via the internet, and research has indicated that 78% of people would consider getting a pet from the internet before visiting the animal. I would like to ask the representative from the RSPCA what impact online sales have had on the sale of dogs and welfare issues.

**Jeremy Cooper:** It has had a significant impact. As I have already alluded to, last year we received 3,500 calls with regard to puppy farm issues, which was a 122% increase. The sad fact is that 80% of these puppies were sold through an internet advert of some description. The dreadful fact that comes out of it is that over 20% of those puppies then die; the mortality is incredibly high. The puppies are often sick at the point of sale, which people do not know, and the Chairman and others have raised today the point that, when that gets home, the impact on the family is dreadful. Consumer rights are affected, and of course there is the welfare of the animal, which is clearly not good and leads to very high levels of euthanasia. If we look at the discrepancy with the numbers I talked about in the very beginning, between the 700,000 and 1.9 million, you wonder where those 1.2 million go. A lot end up euthanised. Yes, there is distress and cost for the family, but for us it is a huge amount of work, because we quite often pick up the pieces of this.

**Coalition Response:** The RSPCA state last year they received over 3,500 calls with regard to puppy farm issues. Could the RSPCA define the term 'puppy farm' in the context of this statement. Could the RSPCA confirm of these calls, what number resulted in investigation and what were the resulting outcomes? The RSPCA further state that 80% of these puppies were sold through an internet advert of some description. Would the RSPCA agree that in fact, the majority of these puppies were merely advertised through the internet and not in fact sold through the internet?

The RSPCA state the dreadful fact that comes out of it is that over 20% of those puppies then die. Could the RSPCA provide evidence supporting this claim, and the claim that it leads to very high levels of euthanasia? The RSPCA refer to their 700,000 to 1.9 million estimate and wonder where those 1.2 million go. This is a significant range, in fact, the higher estimate is over double the lower estimate. In answer to question 85, the RSPCA state that 70,000 puppies - 10% of the puppy market - are born to registered British breeders, therefore using their lower estimate. Could the RSPCA confirm why they refer to their higher estimate of 1.9 million in response to this question?

The RSPCA state they quite often pick up the pieces of this. Could the RSPCA confirm what part of internet advertising they believe is to blame, and what aspect of the process is faulty? Essentially, could the RSPCA clarify what exactly they believe to be the issue with 'online sales'?

#### **QUESTION 135**

**Ms Ritchie:** If the PAAG minimum standards were mandatory, what improvements would this bring to traders who advertise online?

**Jeremy Cooper:** I am going to bow to my colleague next to me, who is far more knowledgeable in this, if you do not mind.

**Paula Boyden:** That is fine. As you know, PAAG was set up in 2001. Dogs Trust are the secretariat for that group. We have come a long way. A number of key internet advertisers work with us, are engaged and have signed up to the minimum standards. However, we have got to a bit of a plateau. There are some sites that will not engage, and equally one can push only so far the sites that are engaged, because clearly everything that is asked of them has an impact on their activities. Therefore, I believe we are the point where we need mandatory requirements. The PAAG minimum standards are a starting point, but clearly they would need to be reviewed if they were to become mandatory. We need to bring the other advertisers into the fold.

**Coalition Response:** The RSPCA bow to Dogs Trust stating they are far more knowledgeable than their organisation. Would the RSPCA agree that in light of their response to question 134 where they state they received 3,500 calls with regard to puppy farm issues, which was a 122% increase, and the fact 80% of these puppies were sold through an internet advert of some description, they should make it their business to be more knowledgeable?

Dogs Trust state the PAAG minimum standards are a starting point, but that clearly they would need to be reviewed if they were to become mandatory. Could Dogs Trust indicate how minimum standards of advertising can impact on the way puppies are bred and sold? Would Dogs Trust agree that minimum standards of advertising can only prevent certain types of animal from being advertised and dictate the information which is included.

### **QUESTION 136**

**Ms Ritchie:** You are now saying that the regulations need to be made mandatory.

**Paula Boyden:** Yes.

**Coalition Response:** Dogs Trust state that minimum advertising standards need to be made mandatory. Could Dogs Trust indicate how PAAG would police all sites where the advertising of animals takes place, to ensure all sites are complying with the mandatory minimum advertising standards?

### **QUESTION 137**

**Ms Ritchie:** Have you spoken to government? Have you made representations to Government? If so, what has been the response?

**Paula Boyden:** Defra sit on the group, and we have met with the Minister. We have not had a direct response regarding the mandating of those minimum requirements, which is something we need to start moving towards and continue to lobby for.

**Coalition Response:** Dogs Trust state they have met with the Minister, but that they have not had a direct response regarding the mandating of those minimum requirements. During the parliamentary Debate in September 2014, George Eustice stated 'Members will understand that making further progress on the internet continues to be our main priority.'<sup>16</sup> In light of this statement by George Eustice, could Dogs Trust clarify why the Minister has not responded directly regarding the mandating of those minimum requirements?

### **QUESTION 138**

**Ms Ritchie:** Are you in favour of banning online sales altogether?

**Paula Boyden:** We have explored this extensively, including with the Minister, but if we were to ban online sales, the challenge we have is that jurisdiction only covers the UK, and therefore you will find websites will pop up outside of the UK selling dogs for sale within the UK. As much as it would be lovely to be able to do that, I do not think it would work.

The other thing we have to bear in mind is that all of us, I am sure, whether you are going to buy a toaster or a car or whatever, probably do a certain amount of research on the internet before you go and make your purchase. The internet is not necessarily a bad thing, but it is the level of the advertising. Clearly we would not want banned breeds' breeding stock or pregnant bitches, for example, to be advertised.

Equally, a lot of it goes back to education, in terms of the individuals going to buy those puppies. We recently did a bit of research with the Pet Food Manufacturers' Association, looking at people going to buy puppies. 20% of those people asked nothing about the puppy at all. This is the problem: it is an emotional purchase. Most people who go and see a puppy will come away with a puppy. Apart from managing the websites, we need to educate people and try to get them to take stock before they go in for that purchase.

**Coalition Response:** Dogs Trust state the purchase of a puppy is an emotional decision and that we need to educate people and try to get them to take stock before they go in for that purchase. Would Dogs Trust agree that one of the best ways to assist the buying public would be to remove the 'impulse purchase' environment, that is, the pet shop environment where the mother of the puppy isn't present and the goal from the sellers perspective is for the buyer to walk out the door with a puppy?

### **QUESTION 139**

**Ms Ritchie:** Considering this is international, because of the nature of online sales, have you made representations

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<sup>16</sup><http://www.publications.parliament.uk/pa/cm201415/cmhansrd/cm140904/debtext/140904-0002.htm>

to Defra and others to seek international requirements to be made in relation to this matter, to prevent the misuse and the abuse of domestic pets?

**Paula Boyden:** We have made representations to the EU, but that was specifically around the pet travel scheme and the challenges the UK is facing regarding that. In terms of international general terms of advertising and sale, one of the challenges we have is the variations, for example, within member states. We have spoken much about improving breeding practices in the UK, but the challenge is that if somebody can go and buy a puppy in Hungary for €50 and bring it into the UK and sell it for £800, they are going to do that.

**Claire Horton:** We understand in France from this year online sellers are required to put their tax registration number on their advert. There is about a 98% compliance with that. Back to our point about registration and having a registration number against that, that is a way to police that and allow online sales to happen whilst having proper traceability around the animal production.

**Chair:** We are going to talk a bit about traceability in a minute. Angela, have you finished?

**Coalition Response:** Dogs Trust state they have spoken much about improving breeding practices in the UK. Could the Dogs Trust elaborate on this statement as no mention of improving breeding practices has been made during this session? Dogs Trust further state that the challenge is that if somebody can go and buy a puppy in Hungary for €50 and bring it into the UK and sell it for £800, they are going to do that. Would Dogs Trust agree that this practice thrives and continues because it is permitted, and not because there is a demand for puppies that the UK cannot satisfy?

Battersea refer to the introduction in France of a requirement that all online sellers are required to put their tax registration number on their advert, and the fact there has been around 98% compliance. Our coalition proposes an introduction of a similar registration scheme – puppy permit if you will – for anyone wishing to sell a litter of puppies irrespective of their existing licensing status, and that this registration number be linked to an existing government number, for example, a council tax number or business tax number. This would ensure that all puppy sellers are linked to a UK premises. The application for a registration number – puppy permit – would be through an existing Local Authority website online payment facility.

#### **QUESTION 140**

**Angela Smith:** Very quickly, it is amazing we have standardised trade across the EU on so many fronts, quite rightly, but when it comes to this, again, we do not standardise it. It is amazing. In the scenario whereby we have made the standards in the PAAG code mandatory and we see a shift of websites abroad, what could we do in that circumstance? How far might that be a problem? We will end up doing nothing to improve the situation if, every time we say we want to do something to improve standards, we are just saying, “We will shift the problem abroad.”

**Paula Boyden:** Partially it goes back to your colleague’s suggestion that we do need to lobby at an EU level to see what we can achieve within Europe as well. Interestingly, one of the websites is based in Australia but advertises within the UK.

**Coalition Response:** Dogs Trust refer to the suggestion that we do need to lobby at an EU level to see what we can achieve within Europe as well. Would Dogs Trust agree the issue is not necessarily with the online classified website itself, but more the way the dogs and puppies being advertised are bred and sold? Would Dogs Trust agree that if a UK based registration system were introduced, and it was mandatory for all sellers to use this registration number when placing advertisements, and the lowest welfare breeding and selling routes were reduced or eliminated, then we would see an immediate improvement in the types of advertisements being placed on online classified websites?

#### **QUESTION 141**

**Angela Smith:** Would you make it illegal for somebody to buy from a website if the registration number was not present?

**Paula Boyden:** There is going to have to be an onus on the purchaser as well as the seller. Obviously the requirement is for the seller to make sure they have their registration number on.

**Chair:** We are straying on to the next question here, but carry on.

**Claire Horton:** Sorry. As harsh as it sounds, it may be a salutary lesson for them if they are not doing their homework, which means researching the pet they are going to buy and that education aspect as well.

**Coalition Response:** Would Battersea and Dogs Trust agree that the simplest and potentially most effective option would be to make it a legal requirement that anyone wishing to advertise a litter of puppies for sale must include their registration number in all advertisements?

#### **QUESTION 142**

**Chair:** Just before we bring Jim in, I have one question. A number of the websites have worked quite well with welfare organisations and Government in trying to improve the situation. Is there more we can do with that? I know we cannot do as much with the foreign ones or others, but can we do more even with our home-grown online sales?

**Steve Goody:** From PAAG's perspective, we have half a dozen or so of the responsible internet-sales sites signed up to those minimum standards. We saw the benefits of that in the first six months of moderation we did, following adoption of those standards, where 100,000 adverts were removed. The difficulty, of course, is that the adverts that were removed were de facto driven towards some of the less responsible websites, which carried them instead. From our perspective, we will continue to work with the responsible websites, and perhaps there is an onus of responsibility on us to do a bit more in terms of publicising where our website is and doing the responsible thing.

The big issue, though, talks very much from our perspective to this whole issue of consumer responsibility and consumer power, because it is the pound and the bottom line that drives these internet-sales sites to do what it is they do. In that respect, if the consumer is being proactive and supporting those sites that are responsible, it does not really matter whether business is being driven offshore. Over time, I, as a responsible consumer, will gravitate away from those offshore businesses that are not behaving responsibly and are not carrying adverts that have a registration number appended to them, because I know they are not conforming with the requirements of regulation or legislation. That will drive those irresponsible businesses out of business over time. It is not going to be a short fix. There is no one single solution. It is about regulation, it is about codes of practice, it is about education, it is about consumer compliance and it is about industry compliance. It is all of that, bound together.

**Chair:** Jim, I will bring you in. We have all but stolen your question.

**Coalition Response:** Blue Cross state following the adoption of their minimum advertising standards, 100,000 adverts were removed in the first six months of moderation. Could PAAG indicate the types of advertisements removed, and the numbers in terms of category? Could PAAG confirm whether there are more up to date figures available?

Blue Cross further state that responsible consumers will naturally gravitate away from those businesses behaving irresponsibly, seeking instead businesses and online classified states that are conforming with the requirements of regulation and legislation. Would Blue Cross therefore agree – in terms of their fear that the commercial sale of dogs could go underground - that the majority of the general public would not actively seek out an underground industry, or support an industry that is not supported by law, particularly where companion animals are concerned – instead, gravitate towards those businesses conforming with the requirements of regulation and legislation.

#### **QUESTION 143**

**Jim Fitzpatrick:** Sort of, Chair. We have covered traceability; we have talked about licensing; we have talked about the seller having confidence in the welfare arrangements that pertain to the breeding of dogs. My question was about the benefits, and you have already described some of the benefits. I am not sure I have total confidence, Steven, in your answer that, if you put all of the information out there, the consumer will drive it the right way. If people see a bargain, lots of people who are not familiar with or educated about the welfare issues that you are all

experts in will think, “It looks good, it sounds good and it is not that much cheaper; I will buy that dog because it looks like a deal.” What are the benefits of a licensing or registration system, and who should keep the database, which is the key question: who is going to monitor it and make sure it works effectively?

**Steve Goody:** There are three different answers to that question.

**Jim Fitzpatrick:** Nobody said being a witness was going to be easy.

**Steve Goody:** No, absolutely not. No one piece of regulation can be an absolute catch-all and panacea for anything. From our perspective, we absolutely recognise that. However, certainly, we are looking for the role of the third sector, the welfare organisations and the local authorities, to be much more joined up and supported by Government in terms of taking some of those responsible-pet-ownership messages out there in a more cohesive way than is currently the case. That has to have added value and benefit, accepting we are never going to get away from the impulse buy, because that is largely driven by emotion. From our perspective, there is an awful lot more we can be doing.

In terms of who ought to be responsible for a centralised database on internet sites, licensing and registration, from our perspective we think that ought to be Defra, managed comprehensively by the local authorities, but not working in splendid isolation from the third sector and other stakeholders who can support the development, implementation and ongoing management of that database.

**Coalition Response:** Blue Cross state they are looking for the role of the third sector, the welfare organisations and the local authorities, to be much more joined up and supported by Government in terms of taking some of those responsible-pet-ownership messages out there in a more cohesive way than is currently the case. Would Blue Cross agree that the mixed messages coming from the UK’s four largest animal welfare organisations – certainly in terms of their support of the Pup Aid petition in 2014 to only see puppies with their mothers present – and now their u-turn on this issue, is giving mixed messages to the public?

#### **QUESTION 144**

**Chair:** Is not the argument that the key to this database is to make sure it is properly kept up to date? You can microchip your dog as many times as you like, but if the database is not up to date, it does not work.

**Paula Boyden:** Quite, and just to tack on to Steve’s point about the database, I understand there are two systems that local authorities use: Memex and IDB. There is move to start getting them to talk to each other, because they are working in their silos at the moment. It does not necessarily mean starting from scratch, but utilising what is already there might be an opportunity.

**Chair:** Our final questions on enforcement are from Angela and Simon Hart. It will be interesting to see whether we get a degree of agreement across the piece.

**Coalition Response:** Dogs Trust state, in terms of a central database, it does not necessarily mean starting from scratch. Our coalition supports the utilisation of existing Local Authority websites and in particular their facility to pay fees online linked to existing Local Authority reference numbers e.g. council tax numbers or business tax numbers.

#### **QUESTION 145**

**Angela Smith:** Claire talked earlier about the differences we face in relation to enforcement of licensing regulations by local authorities, and of welfare issues more generally. What improvements do you think need to be made at local government level to improve enforcement? It is a big question, I know, and I know there is a difference of opinion on how you would fund it, but what needs to happen to improve enforcement? What is the single thing that would make a big difference?

**Claire Horton:** It is properly qualified and competent inspectors, who know what they are looking at, can see issues, and have the power to deal with it, be it with a fixed penalty notice or something else. Not all local authorities have

those resources, and not every inspector is an expert in animals, so it is about the potential for the creation of almost a national inspectorate. Paula mentioned this earlier on. We know there is the ability and the appetite to do that, and there are local government organisations that have the capacity to provide a central inspectorate. If there is a group of individuals who can be called on by local authorities to go and do the inspections and the licensing, that would be very helpful. It would standardise the huge spread of costs we are seeing, the £40 to £700 we saw earlier on. Standardise those licensing costs and make everybody accountable, including those who have to register just the once if they have some puppies to sell. Everybody then becomes traceable. Nobody is under the radar.

**Coalition Response:** Battersea refer to licensing and registration. Would Battersea agree that enforcement does not necessarily address motivation or incentivise people to breed dogs well. With this in mind, could Battersea confirm at what point simple registration would convert to licensing, that is, how many litters would require the need for a breeder to become licensed as opposed to just registration?

#### **QUESTION 146**

**Angela Smith:** We have to be careful here to distinguish between the enforcement of licensing legislation - regulations - on the one hand, and then welfare issues related to dog control and so on the other. It is really important to distinguish between the two. I assume you would also be arguing that the funding of the licensing enforcement would come through the licence fees, primarily.

**Claire Horton:** Yes.

**Coalition Response:** Could Battersea elaborate on how they would foresee licensing being enforced through fees, and provide evidence through costings that this is possible?

#### **QUESTION 147**

**Angela Smith:** I know the funding of the other side of it is where the difference of opinion is, but would licensing enforcement be through the fees?

**Claire Horton:** Yes.

**Coalition Response:** Could Battersea elaborate on how they would foresee licensing being enforced through fees, and provide evidence through costings that this is possible?

#### **QUESTION 148**

**Simon Hart:** Isn't there a cheaper and easier option, which is to ensure that anybody who buys a pup sees it with its mother? We would not have a need for inspectors, or the inspectors would not have the demands that we have been discussing, because people who are not meeting welfare standards would have no market. Is that not a better way of achieving the same objective?

**Paula Boyden:** I do not believe that simply seeing a puppy with its mother is going to negate the need for inspection. A puppy is going to be sold at eight weeks of age, so what is happening in those eight weeks prior to that puppy, the conditions.

**Chair:** Maybe Simon could qualify what he means.

**Coalition Response:** Dogs Trust state that simply seeing a puppy with its mother will not negate the need for inspection. Would Dogs Trust agree that if all dog breeding premises were open to public scrutiny, that is, all puppies were sold in the presence of their mother, then those not meeting welfare standards would have no market, and inspectors would not find themselves having to undertake repeat inspections following reports of animal welfare issues. Would Dogs Trust agree that there would be less pressure put on Local Authorities in terms of Freedom of Information requests if those people who are not meeting welfare standards were forced out of the market. Would Dogs Trust agree that if all dog breeding establishments were open to public scrutiny, that is, third party puppy

vending were eliminated, there would be less secrecy around licensing and a greater degree of trust in Local Authorities.

#### **QUESTION 149**

**Simon Hart:** Of course it does not eliminate it, but as we know there are pups going into the retail part of this chain at considerably younger than eight weeks. Eight weeks is an interesting observation to make. All I am saying is that we are talking about driving out of business altogether people who undertake this trade to welfare standards that none of us approve of. That is what we doing, isn't it, and quite reasonably so? One way of doing that is, surely, to eliminate that element of the equation that is the most embarrassing, and that is people at the moment being unable to see the mothers of the puppies they are buying.

**Claire Horton:** We know there are some sellers who will have mothers on show with the puppies that are not the puppies' mothers.

**Coalition Response:** Battersea state there are some sellers who will have mothers on show with the puppies that are not the puppies' mothers. Could Battersea provide evidence supporting this claim, specifically in comparison to the number of breeding dogs in licensed dog breeding establishments where puppies are not sold directly to the public?<sup>17</sup>

#### **QUESTION 150**

**Simon Hart:** You will always get scammers. There will always be scammers, whatever we do.

**Claire Horton:** There are some fairly large-scale scammers, and those are the problem people we are talking about. Particularly the really big commercial dealers will take puppies with mothers that are not their mothers, and move them.

**Coalition Response:** Battersea state there are some fairly large-scale scammers, and those are the problem people we are talking about. Could Battersea provide evidence of these fairly large-scale scammers? Battersea further state the really big commercial dealers will take puppies with mothers that are not their mothers, and move them. Could Battersea provide evidence supporting this claim, including on what scale and by whom? Would Battersea agree that this is an enforcement problem? Could Battersea confirm how they would hope to address this issue if the practice of third party puppy vending remains legal?

#### **QUESTION 151**

**Simon Hart:** The fact is that Defra uses this a guideline. Your charities sign up to that as a principle. It is not as if we do not agree that it is best for a purchaser to see a pup with its mother when you make that purchase. All I am suggesting is that that is the avenue down which we should go in order to minimise, not eliminate, the need for copious inspections in darkened buildings in mid-Wales that the rest of us have no access to. I put it to you: is that not a better way of achieving the same objective? Anybody else?

**Steve Goody:** I suppose the short answer is that we would look at it from the other end of the telescope that says, "Give us the regulation and give us the enforcement that sits behind it to ensure that we can get into these dark premises to do the job properly."

**Simon Hart:** That is just what I wanted to hear.

**Chair:** Thank you very much for that answer. Can I thank you all very much for some very good evidence this afternoon? It will make part of our report, so thank you very much. We will now move on to the next session, but I suspect we will be having a vote at any moment. However, we will start. Thank you very much. Good evidence, thank you.

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<sup>17</sup> Appendix: Figure 2 - 4

**Coalition Response:** Blue Cross state give us the regulation and give us the enforcement that sits behind it to ensure that we can get into these dark premises to do the job properly. The darkened buildings referred to are already inspected by Local Authority Licensing Inspectors who have full access to these premises. Would Blue Cross agree that the best solution in terms of animal welfare would be for those puppies being bred in those darkened buildings to only ever be sold in the presence of their mother, thus effectively opening up all dog breeding establishments to public scrutiny – eliminating the third party route to market which is particularly prevalent in Wales?<sup>18</sup>



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<sup>18</sup> Appendix: Figures 2 – 4

Figure 1: Number of Welsh Licensed Dog Breeders – April 2015 v December 2015

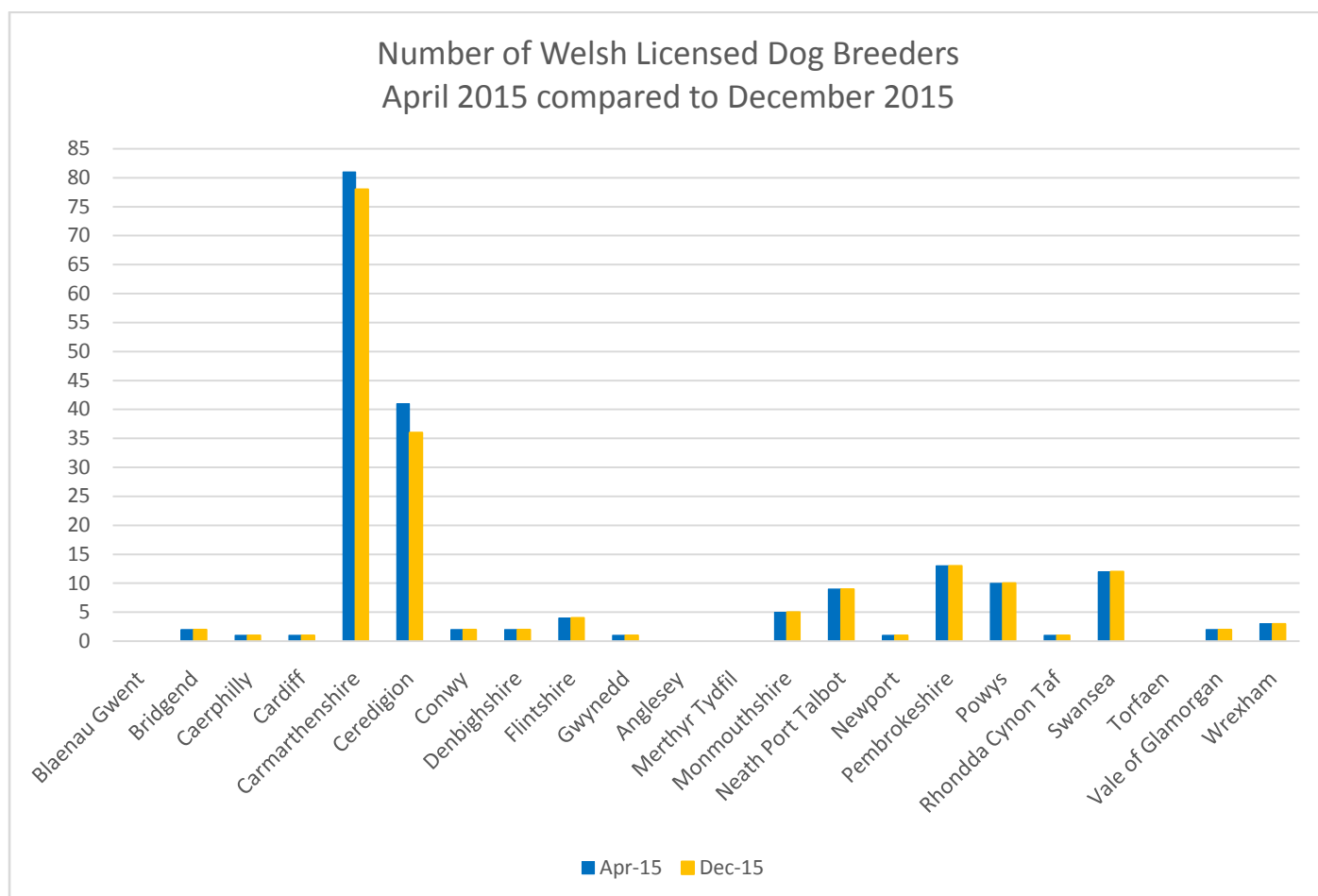


Figure 2: Carmarthenshire licensed dog breeders selling through licensed pet shops 2014 - 2015: Number of breeding dogs per breeder (breeders 1-20).

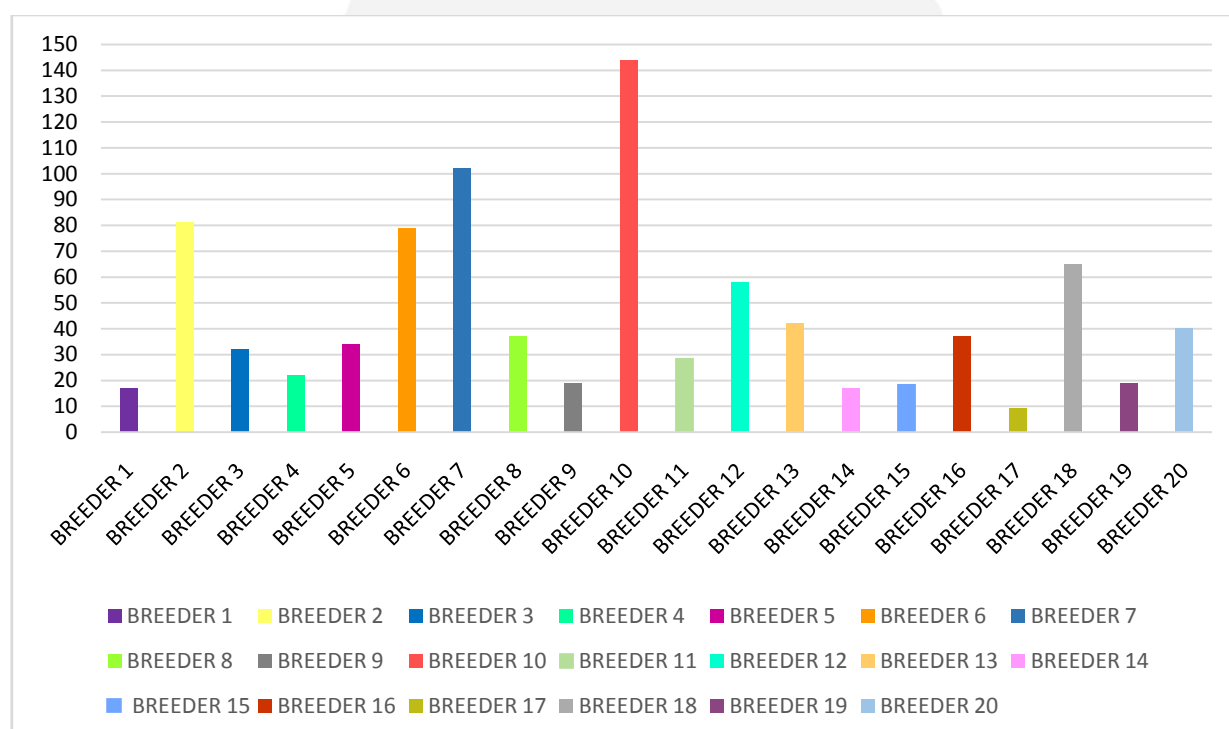


Figure 3: Carmarthenshire licensed dog breeders selling through licensed pet shops 2014 - 2015: Number of breeding dogs per breeder (breeders 21-40).

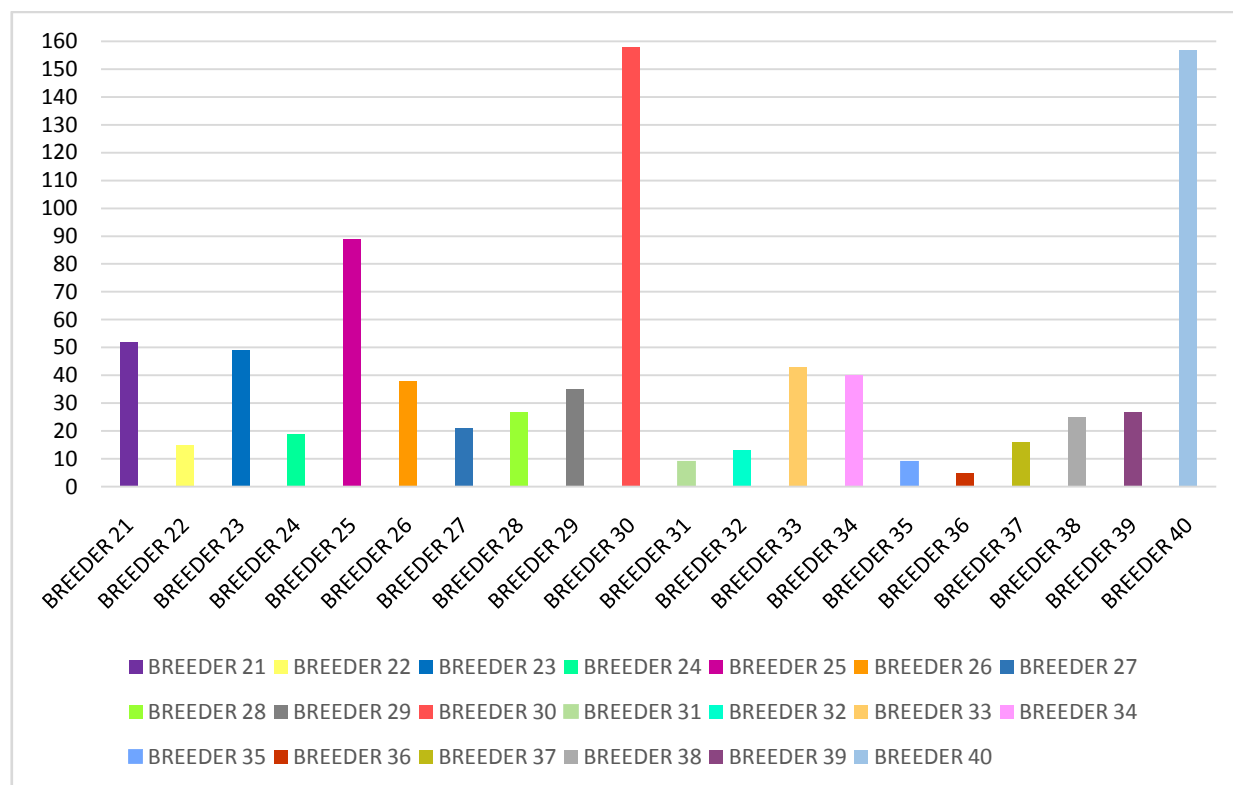
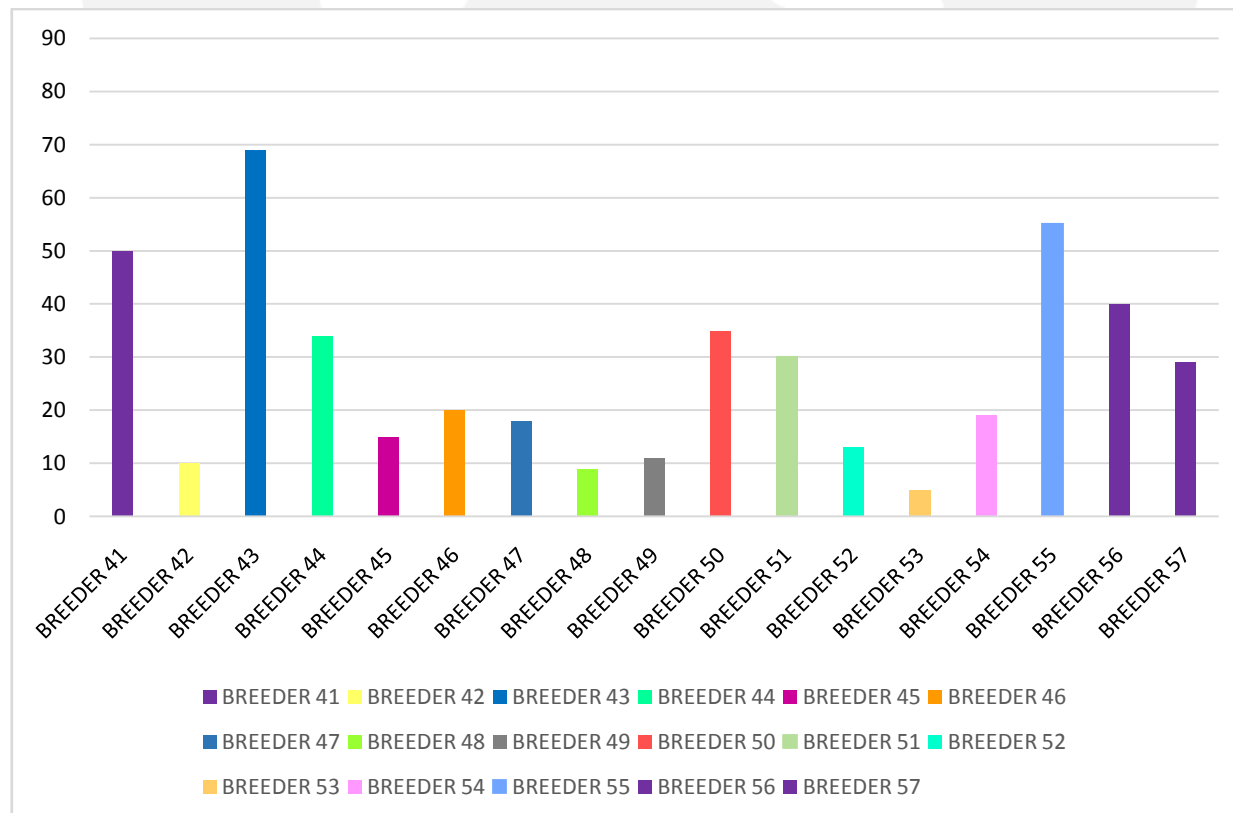


Figure 4: Carmarthenshire licensed dog breeders selling through licensed pet shops 2014 - 2015: Number of breeding dogs per breeder (breeders 41-57).



## Science Papers Supportive Evidence

**TITLE:** Differences in behavioural characteristics between dogs obtained as puppies from pet stores and those obtained from non-commercial breeders.

**REFERENCE:** Franklin D. McMillan, DVM, DACVIM; James A. Serpell, PhD; Deborah L. Duffy, PhD; Elmabrok Masaoud, PhD; Ian R. Dohoo, DVM, PhD

**OBJECTIVE:** To compare the owner-reported prevalence of behavioural characteristics in dogs obtained as puppies from pet stores with that of dogs obtained as puppies from non-commercial breeders.

**LINK:**<http://avmajournals.avma.org/doi/abs/10.2460/javma.242.10.1359>

**RESULTS:** Pet store–derived dogs received significantly less favourable scores than did breeder-obtained dogs on 12 of 14 of the behavioural variables measured; pet store dogs did not score more favourably than breeder dogs in any behavioural category. Compared with dogs obtained as puppies from non-commercial breeders, dogs obtained as puppies from pet stores had significantly greater aggression toward human family members, unfamiliar people, and other dogs; greater fear of other dogs and non-social stimuli; and greater separation-related problems and house soiling. Frank McMillan commented that the extent of the abnormalities in dogs sourced from large-scale breeders was a surprise. He said, “The problems span so many different types of behaviours, and the differences are rather extreme for some of the behaviours.”

The authors conclude that until the causes of the unfavourable differences detected in this group of dogs can be specifically identified and remedied, they cannot recommend that puppies be obtained from pet stores.

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**TITLE:** Mental health of dogs formerly used as ‘breeding stock’ in commercial breeding establishments.

**REFERENCE:** Franklin D. McMillan, Deborah L. Duffy, James A. Serpell

**OBJECTIVE:** Numerous anecdotal reports have suggested that after removal from CBEs many of the former breeding dogs display persistent behavioural and psychological abnormalities when compared with the general pet dog population. The purpose of this study was to determine if this anecdotal evidence could be confirmed empirically.

**LINK:**[http://www.appliedanimalbehaviour.com/article/S0168-1591\(11\)00300-5/abstract](http://www.appliedanimalbehaviour.com/article/S0168-1591(11)00300-5/abstract)

**RESULTS:** When compared with a convenience sample of pet dogs matched for breed, sex, age and neuter status, former CBE breeding dogs were reported as showing significantly higher rates of health problems (23.5% versus 16.6%,  $P = 0.026$ ). With respect to behaviour, CBE dogs displayed significantly higher rates of fear (both social and non-social; ordinal GLM models,  $P < 0.001$ ), house-soiling ( $P < 0.001$ ), and compulsive staring ( $P < 0.005$ ); and significantly lower rates of aggression (toward strangers and other dogs;  $P < 0.0001$ ), trainability ( $P < 0.0001$ ), chasing small animals ( $P < 0.0001$ ), excitability ( $P < 0.0001$ ), and energy ( $P < 0.0001$ ).

By demonstrating that dogs maintained in these environments develop extreme and persistent fears and phobias, possible learning deficits as evidenced by lower trainability, and often show difficulty in coping successfully with normal existence, this study provides the first quantitative evidence that the conditions prevailing in CBEs are injurious to the mental health and welfare of dogs.

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**TITLE:** Association between prospective owner viewing of the parents of a puppy and later referral for behavioural problems.

**REFERENCE:** C. Westgarth, BSc(Hons) PhD1, K. Reeve, BSc(Hons) MSc(CABC) KCAI CCAB1 and R. Barclay, BSc(Hons) MPhil CCAB2

**OBJECTIVE:** A case-control study was designed to test whether there is an association between the owners seeing the mother of a puppy, and later development of behavioural problems.

**LINK:**<http://veterinaryrecord.bmj.com/content/170/20/517>

**RESULTS:** After adjustment for confounding factors using multivariable logistic regression, case dogs were more likely to be younger than controls ( $P < 0.001$ ); less likely to be obtained at six (OR = 0.27, 95 per cent CI = 0.09 to 0.85,  $P = 0.03$ ), nine (OR = 0.22, 95 per cent CI = 0.06 to 0.80,  $P = 0.02$ ) or 10 weeks (OR = 0.35, 95 per cent CI = 0.12 to 1.01,  $P = 0.05$ ), than eight weeks; more likely for the owner to have seen only one parent (OR = 2.49, 95 per cent CI = 1.15 to 5.37,  $P = 0.02$ ) than both parents, and more likely to have not seen either parent (OR = 3.82, 95 per cent CI = 1.12 to 12.97,  $P = 0.03$ ) than both. Advice to 'see the mother' has been shown to be partly scientifically accurate in relation to future unwanted behavioural problems among dogs; in fact, it may be better for prospective owners to be recommended to view both parents.

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**TITLE:** The Domestic Dog - Its Evolution, Behaviour and Interactions with People

**REFERENCE:** James Serpell (contributors - James Serpell, Juliet Clutton-Brock, Raymond Coppinger, Richard Schneider, M. B. Willis, Benjamin L. Hart, J. A. Jagoe, Chris Thorne, John W. S. Bradshaw, Helen M. R. Nott, Randall Lockwood, Roger A. Mugford, Valerie O'Farrell, Lynette A. Hart, Robert Hubrecht, D. W. Macdonald, G. M. Carr, L. Boitani, F. Francisci, P. Ciucci, G. Andreoli)

**OBJECTIVE:** This unique book seeks to expose the real dog beneath the popular stereotypes. Its purpose is to provide a comprehensive, state-of-the-art account of the domestic dog's natural history and behaviour based on scientific and scholarly evidence rather than hearsay.

**LINK:**<http://www.cambridge.org/gb/academic/subjects/life-sciences/animal-behaviour/domestic-dog-its-evolution-behaviour-and-interactions-people>

**RESULTS:** '... is not just for dog lovers but also for the curious. With enough detailed studies to interest specialists, this book is readable and stimulating. It ranges from the psychology of pets and their owners to the fascinating history of dogs' domestication and diversification as a species.' New Scientist

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**TITLE:** Puppy socialisation and the prevention of behavioural problems.

**REFERENCE:** Irish Veterinary Journal 2010 Vol. 63 No. 10 pp. 630-633

**OBJECTIVE:** Establishing the importance of socialisation in ensuring a puppy is friendly and well-adjusted.

**LINK:**<http://www.cabdirect.org/abstracts/20103297484.html>

**RESULTS:** The most common cause of fear and aggression is lack of socialisation and behavioural problems often originate from fearful dogs. Indeed, behavioural issues are the most common cause of euthanasia in dogs under two years of age.

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**TITLE:** Relationship between aggressive and avoidance behaviour by dogs and their experience in the first six months of life.

**REFERENCE:** Appleby, D., Bradshaw, J. and Casey, R

**OBJECTIVE:** To test behavioural signs for association with the dog's maternal environment, the environment it experienced between three and six months of age, and the age at which it has been acquired.

**LINK:**[https://www.researchgate.net/publication/11376544\\_Relationship\\_between\\_aggressive\\_and\\_avoidance\\_behaviour\\_by\\_dogs\\_and\\_their\\_experience\\_in\\_the\\_first\\_six\\_months\\_of\\_life](https://www.researchgate.net/publication/11376544_Relationship_between_aggressive_and_avoidance_behaviour_by_dogs_and_their_experience_in_the_first_six_months_of_life)

**RESULTS:** Non-domestic maternal environments, and a lack of experience of urban environments between three and six months of age, were both significantly associated with aggression towards unfamiliar people and avoidance behaviour. Aggression during a veterinary examination was more likely in dogs from non-domestic maternal environments.

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**TITLE:** Human directed aggression in domestic dogs (*Canis familiaris*): Occurrence in different contexts and risk factors.

**REFERENCE:** Rachel A. Casey, Bethany Loftus, Christine Bolster, Gemma J. Richards, Emily J. Blackwell. School of Veterinary Science, University of Bristol, Bristol, UK

**OBJECTIVE:** The consequence for dogs of showing aggression towards people is often euthanasia or relinquishment. Aggression is also a sign of compromised welfare in dogs, and a public health issue for people. The aims of this study were to estimate the numbers of dogs showing aggression to people in three contexts (unfamiliar people on entering, or outside the house, and family members); identify whether these co-occur, and investigate risk factors for aggression in each context using multivariable analyses.

**LINK:**[http://www.appliedanimalbehaviour.com/article/S0168-1591\(13\)00292-X/abstract](http://www.appliedanimalbehaviour.com/article/S0168-1591(13)00292-X/abstract)

**RESULTS:** These data suggest that although general characteristics of dogs and owners may be a factor at population level, it would be inappropriate to make assumptions about an individual animal's risk of aggression to people based on characteristics such as breed.

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**TITLE:** Prevalence of owner-reported behaviours in dogs separated from the litter at two different ages.

**REFERENCE:** Pierantoni L1, Albertini M, Pirrone F.

**OBJECTIVE:** The present study examined the prevalence of behaviours in dogs separated from the litter for adoption at different ages.

**LINK:**<http://www.ncbi.nlm.nih.gov/pubmed/21865608>

**RESULTS:** These findings indicate that, compared with dogs that remained with their social group for 60 days, dogs that had been separated from the litter earlier were more likely to exhibit potentially problematic behaviours, especially if they came from a pet shop.

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**TITLE:** Owner-Reported Aggressive Behavior Towards Familiar People May Be A More Prominent Occurrence in Pet Shop Traded Dogs.

**REFERENCE:** Federica Pirrone, Ludovica Pierantoni, Giovanni Quintavalle Pastorino, Mariangela Albertini

**OBJECTIVE:** There is longstanding recognition of the adverse effect of stressful experiences during early critical developmental periods and the later association with problematic behavioural issues in dogs. The aim of this study was to evaluate whether the origin/source of puppies (pet shop vs. breeder) was associated with later potential problematic behaviours.

**LINK:**[http://www.journalvetbehavior.com/article/S1558-7878\(15\)00197-5/abstract](http://www.journalvetbehavior.com/article/S1558-7878(15)00197-5/abstract)

**RESULTS:** The odds of displaying owner-directed aggression were significantly greater for the dogs that had been purchased from a pet store as puppies than those purchased from a breeder (control group). We also found an

association between a dog's pet store origin and other potential problem behaviours, including house soiling, body licking, and separation-related behavior, but this relationship was confounded by the effect of a set of owner-related factors. These findings indicate that obtaining puppies from pet stores may predispose them to potentially exhibit owner-directed aggression as adults. We suggest that further research in prevention of problem behaviours in adult dogs should be aimed at identifying the root causes of pet store-related behavioural issues, without ignoring confounding at a household level.

