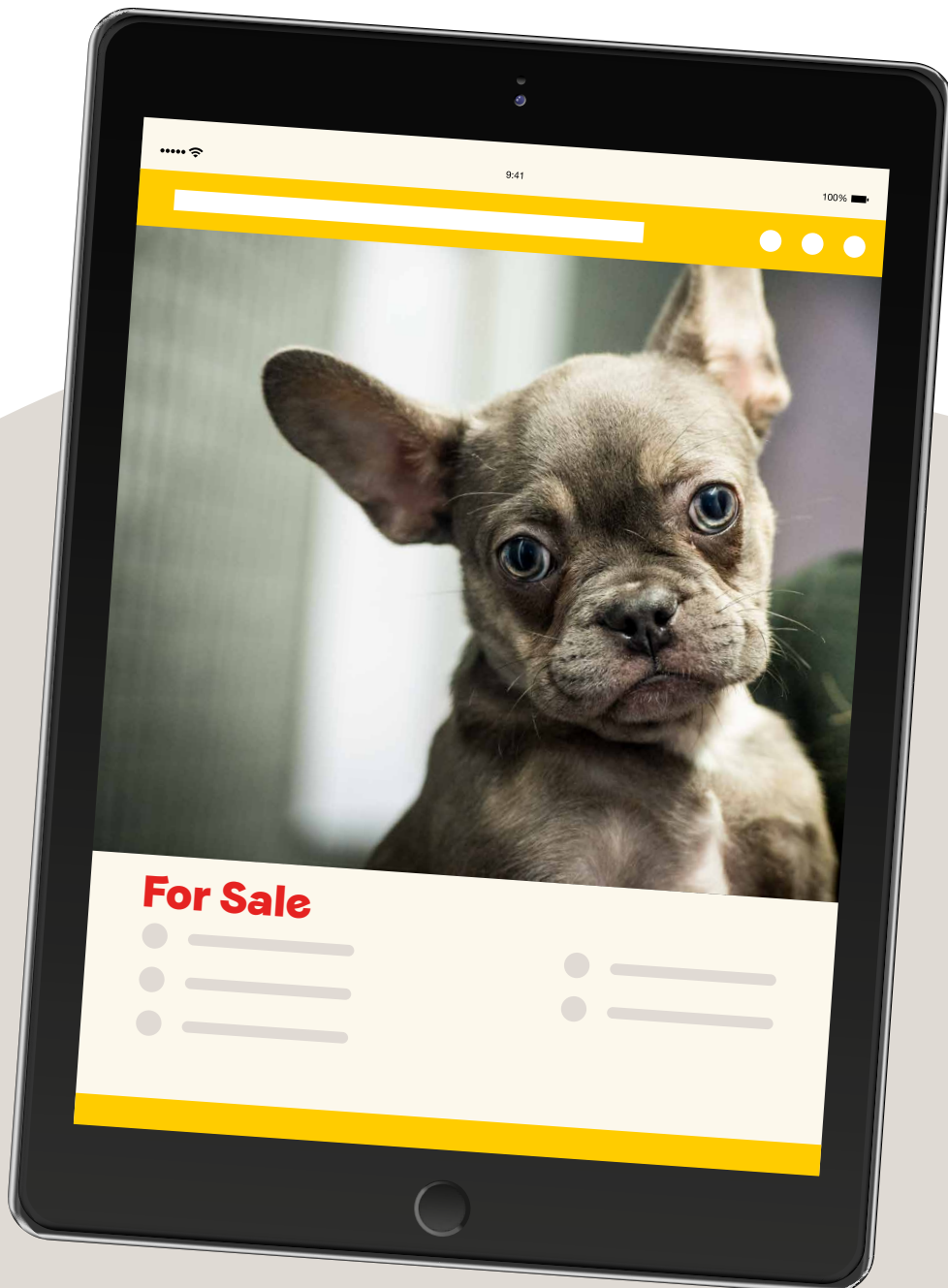




Puppy Smuggling: **Puppies still paying as Government delays**

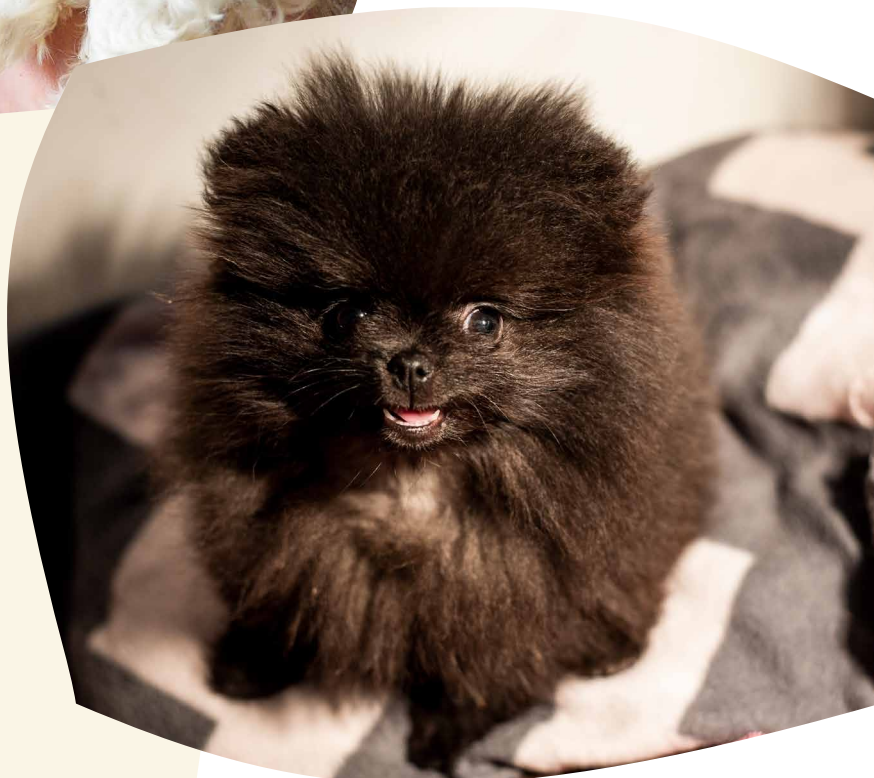


An investigation of online puppy adverts



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Introduction

For six years Dogs Trust has been lobbying Government for changes to the Pet Travel Scheme (PETS) after the EU harmonisation of the UK travel rules in 2012 led to a flood of underage puppies being illegally imported into Great Britain for sale. We have previously produced four investigative reports into the abuses of the travel scheme and provided mountains of evidence of the industrial scale of illegal importation of puppies from Central and Eastern Europe to meet the huge demand for puppies in the UK. Yet, six years on, the abuses are ongoing and the action from Government has been minimal. Traders continue to adapt their practices to avoid detection, including the troubling development of heavily pregnant female dogs being transported illegally in the very late stages of pregnancy; an effective means of passing puppies off as UK bred and also getting around Government advice to prospective puppy buyers to always see a puppy with its mum.

The challenges have not stopped there. Even during the COVID-19 pandemic and the restriction of movements implemented to tackle the spread of the virus, we continued to see puppies being brought illegally into the country. In response to the escalating demand for pets, traders utilised the commercial rules of pet travel, known as the Balai Directive. There are no checks on entry to the country when travelling using this legislation, and for a period COVID-19 restrictions meant post import checks were also not being conducted, opening the floodgates for illegal importations.

It's time to say enough is enough; for every month of Government delay hundreds of puppies are paying the price.

Our latest investigation focuses on the GB side of the trade. It highlights just how prolific imported puppies are on the online classified advertising sites, and how anyone buying a puppy could be unwittingly fuelling the trade in illegal imports. We uncover the scale of the trade, the tricks that sellers use, and the questions buyers should be asking to protect themselves from scams.

Paula Boyden

Dogs Trust Veterinary Director

What does Dogs Trust want?

Following the end of the EU Exit transition period on 31st December 2020, we are at a critical time for Government action. They must:

- **Raise the minimum age for puppies to be imported into the UK to six months to help make them less desirable for purchase. Dogs Trust supports reintroducing a requirement for a rabies blood (titre) test before entry into the UK, together with a wait period post vaccination which is in line with the incubation period of rabies. This means that the age at which puppies could legally enter the UK would be increased to six months.**
- **Bring in tougher penalties for smuggling pups to deter deceitful sellers. This is already within the gift of Government and could be implemented immediately. Only a handful of puppy smuggling cases have ever been prosecuted and you can get a longer sentence for smuggling cigarettes than you can for smuggling puppies.**

Summary of current situation

Almost nine years on from the changes to the Pet Travel Scheme (PETS) in 2012, the unintended consequences of which effectively invited unscrupulous commercial dealers to traffic underage puppies into Great Britain for sale, sadly very little has changed.

Despite four in-depth investigative reports, mountains of evidence and consistent recommendations on how to improve the situation, Government action to date has been limited and the number of puppies imported under PETS has increased significantly from 85,299 in 2011, prior to the changes, to 307,263 in 2019. In December 2015, Dogs Trust established the Puppy Pilot to provide care and support for illegally imported puppies seized at the ports during their time in quarantine. By funding the care of these dogs and supporting their responsible rehoming, enforcement agencies at the ports have been freed up to focus on seizures knowing the fate of the puppies was secure with Dogs Trust. To the end of November 2020, the Puppy Pilot had cared for and rehomed over 1,400 puppies.

However, 2020 has seen an escalation of the problems with dealers taking advantage of the increase in public demand for dogs during the COVID-19 restrictions, and the subsequent rocketing of dog prices, to flood the market with imported puppies. Google searches for 'buy a puppy' increased by 166% between the lockdown announcement in March and the end of July 2020¹.

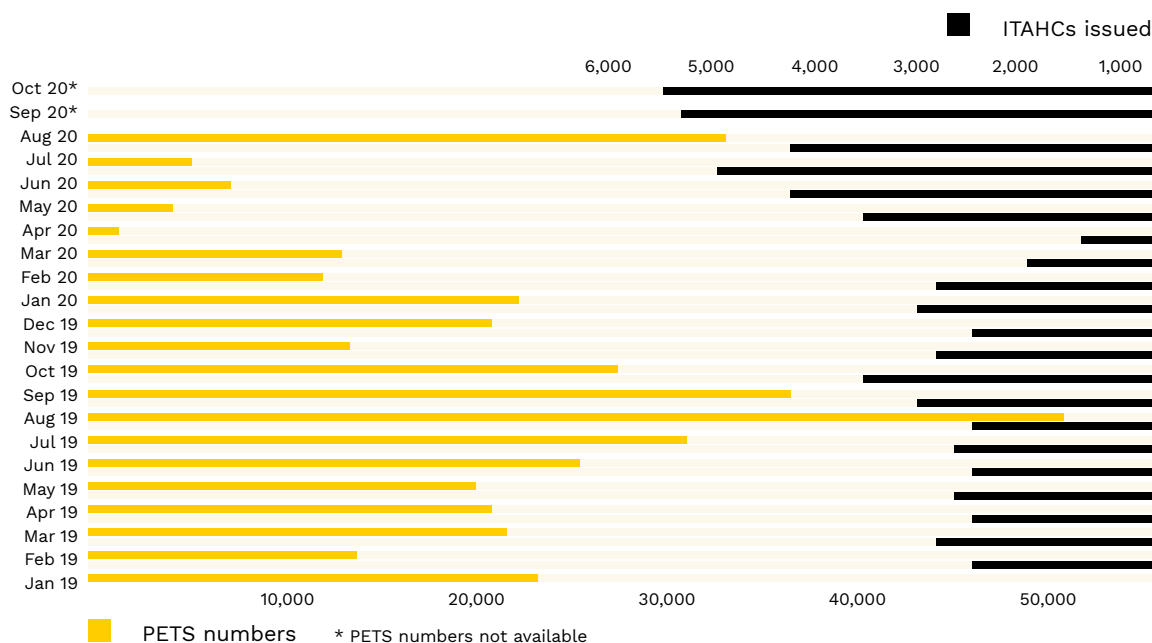
One of the clear trends at the height of the pandemic was a shift away from imports under PETS, due largely to the lockdown travel restrictions, to imports under the commercial legislation, otherwise known as the Balai Directive. Each Intra Trade Animal Health Certificate (ITAHC) issued under the Balai Directive can cover a number of dogs in a consignment. Dogs transported in this way are not subject to checks at the border, and only around 5% of consignments are checked post import, a tiny proportion of the whole trade. During lockdown these checks were suspended altogether.

Where once the trade was largely restricted to high value breeds such as French Bulldogs, Dachshunds and English Bulldogs, we have seen in 2020 a divergence into previously lower value breeds such as Labradors and Cocker Spaniels as rising prices made it worth the effort of being caught. Even if a puppy was seized and spent weeks in quarantine, the owner could reclaim the puppy, pay the quarantine fees and still make a profit on the onward sale. Prior to lockdown reclamation rates by owners stood consistently at around 5%, with the majority of puppies being abandoned. During lockdown this reversed with upwards of 90% of puppies being reclaimed for probable resale.

In April 2020, a ban on commercial Third-Party Sales came into force in England, requiring all dogs under six months of age to be bought directly from the breeder or rehomed from a rescue organisation. Illegal importers have, however, been quick to circumvent this ban, importing pregnant bitches in the late stages of pregnancy to ensure buyers can 'see mum' with the young puppies before the bitch is returned to her country of origin to be bred from again.

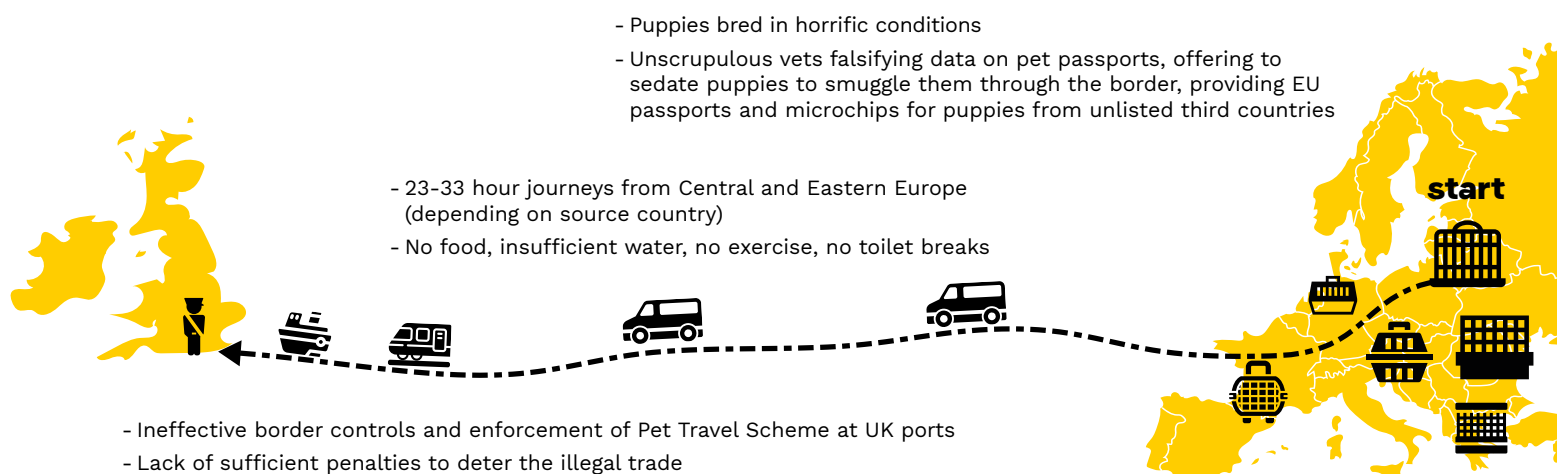
ITAHC and PETS figures

Commercial and non-commercial movements of dogs 2019-2020



¹ Figures sourced from Propellernet, based on Google searches for "buy a puppy" from week commencing 22nd March 2020 and week commencing 12th July 2020.

Puppy Smuggling: Exposed



Puppy Pilot

Over 1,400 puppies with an approximate total market value of over £2 million

have been admitted to Dogs Trust through the Puppy Pilot between December 2015 and November 2020

38 pregnant bitches cared for by Dogs Trust since early 2019 to November 2020; they gave birth to 176 puppies

The approximate total market value of the puppies born to pregnant bitches admitted to Dogs Trust through the Puppy Pilot since early 2019, would have been over £400,000

Increase in prices of dogs

Our statistics show prices for some of the UK's most desirable dog breeds also reached record levels in 2020, as some sellers exploited the increased demand for puppies during lockdown. The data reveals the average price increased by:

Percentage increase	Breed	Price in October	Price in March
↑ 73%	Dachshunds	£1,681	£973
↑ 134%	Chow Chows	£2,618	£1,119
↑ 49%	English Bulldogs	£2,436	£1,637
↑ 70%	French Bulldogs	£2,128	£1,251
↑ 78%	Pugs	£1,220	£684

Source: Tech4Pets

Methodology

Over the past six years, Dogs Trust has carried out four undercover investigations in Central & Eastern Europe exposing the extent of the huge trade in illegal importations of puppies to Great Britain. This time we wanted to highlight what is happening to the puppies once they reach Great Britain, where they are being sold, what back stories the importers are using to cover their tracks, and offer advice to buyers on how to avoid buying an illegally imported puppy.

Our researcher looked at adverts from four of the largest UK classified advertising websites Gumtree, Freeads, Preloved and Pets4Homes.

The researcher responded via telephone and email to adverts for French Bulldogs, Pomeranians, Chow Chows, Maltese and Dachshunds under the age of six months. These breeds were selected as they are amongst the most common breeds that have been intercepted coming into the UK from Central & Eastern Europe on the Puppy Pilot in the last two years. There was no price restriction, meaning the researcher did not apply an upper or lower price limit to the advert search.

Adverts were reviewed over a six-week period from the 23rd September to 4th November 2020.

A total of 640 adverts were reviewed in England (311), Scotland (191) and Wales (138) with a focus on the cities with the highest populations as well as additional towns to provide a wide geographical spread.

For each advert our researcher asked a series of questions to try to establish if the puppy was available to see with its mother or siblings, if it had appropriate paperwork and a microchip, and if it was possible to visit the puppy in its home. Where necessary, if all the signs suggested that the puppy had been imported but this had not been stated, the investigator asked the question directly.



Summary of findings:

- The total number of imports found was 91 (England 78, Scotland 13, Wales 0)
- This works out as 29% of adverts in England, 7% in Scotland and 0% in Wales
- 14% of all adverts reviewed were for imported puppies
- At least 18% of the imported puppies were confirmed by the seller as being under the minimum 15 weeks of age. Many others were suspected of being underage
- Adverts for imported puppies were found on all four of the classified websites
- The youngest puppy advertised was only 7 weeks of age when it entered Great Britain, too young to legally leave its mum
- None of the puppies confirmed as having been imported could be viewed with mum
- Only two of the 91 adverts for imported puppies included a photo or video of mum
- None of the original advert text stated that the puppy had been imported, this was only revealed by further conversation

We also found:

- Evidence of selling networks and 'pop up' pet shops
- Evidence of other breeds, in addition to the puppies advertised, available on demand
- Ages of pups inconsistent with passport details and rabies vaccination dates

Results and case studies

Case study 1

Chow Chow from Bulgaria | For sale in London

In this instance the seller stated that she brings Chow Chows into the UK every one to two weeks. The puppies' mums are in Bulgaria. At the time of approaching she had one male and one female Chow Chow aged three months for sale. Although it was stated that the puppies had had all of their vaccinations, the rabies vaccination should not be administered until a puppy is three months old, and the puppy should not legally travel from Bulgaria to Great Britain until it is 15 weeks old. Therefore the puppy could not be three months old and have been imported legally. Copies of the passport and paperwork were requested via WhatsApp but were never sent. When asked if she was able to provide other breeds later in the year, she said yes.

Case study 2

Maltese from Poland | For sale in Perth, Scotland

This seller advertised a Maltese puppy at eight weeks of age. The advert did not state that the puppy had been imported. In further communications the seller stated that the puppy had come to the UK from Poland at just seven weeks of age. This is too young for it to legally have left its mother, five weeks too early to be vaccinated against rabies and eight weeks before it could legally enter the UK. This was the youngest confirmed import of the whole study. Although the seller claimed that the puppy came from 'pedigree parents' in Poland, when questioned about the breeder she said it wasn't her business to ask too many questions. The advert illustrates how prevalent imports are even outside of major UK cities.

Case study 3

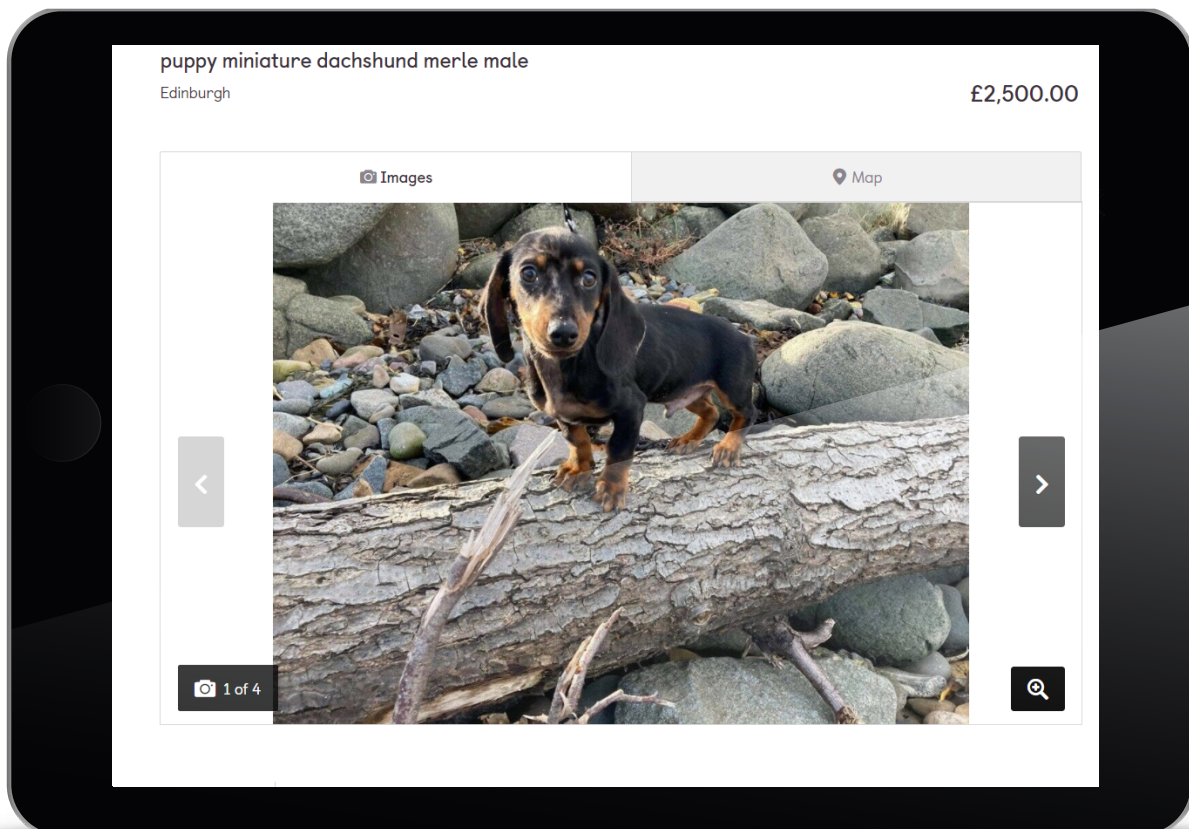
Pomeranian from Russia | For sale in London

In several cases, our researcher noted sellers using a number of websites to advertise their puppies. In this example the same puppy appeared on two different websites, advertised on one as being from Russia and on another as being from Slovakia. The puppy was advertised as being four months old but the seller stated that he had been in the UK for over a month. This means he was imported at a maximum of three months of age, too young for him to have legally travelled to the UK from Russia. Confirming this, the seller stated that the puppy had his rabies vaccination on 07/08/20, making the dates inconsistent with him being four months old and having spent one month in the UK already.

Case study 4

French Bulldogs from Bulgaria | For sale in London

This seller was very vague about the details of the puppies available. He said that he had friends who could provide dogs and that anything was possible in terms of ordering puppies. When the researcher asked about getting Chow Chows in time for Christmas, the seller said that they would send some photos. They said they regularly made trips with puppies to the UK by car and that they had never had a problem at customs. The researcher asked to see copies of the passports for the French Bulldog puppies but the seller called back the next day to say that there was something wrong with their papers and that he would be back in touch in a few months with details of more puppies.



Case study 5

Chow Chow from Hungary | For sale in Sheffield

The seller stated that the mum and dad of the puppies are with his brother in Hungary. In a very brief communication, the seller was open about the puppies having been imported from Hungary. Further communication revealed that another relative was running an informal “puppy shop” in Sheffield. He stated he also had English Bulldogs from Hungary (aged three and a half months) and that his family had 20 breeding bitches in Budapest. He stated they had been running the business for three years in Sheffield. A copy of a Hungarian passport was sent via WhatsApp when requested.

Case study 6

French Bulldog from Poland | For sale in Edinburgh

This advert for a three-month old French Bulldog was short on detail and did not mention the puppy’s country of origin. Further communications were also brief, with the seller claiming the puppy’s parents were ‘champions’ and that the puppy would come with ‘all KC documents that are valid worldwide’. She also stated that the puppy had been in the UK since it was eight weeks old, meaning it was far too young to have entered the UK legally. This is one of a number of examples of a significant supply route from Poland to Scotland that was documented during this study.

Case study 7

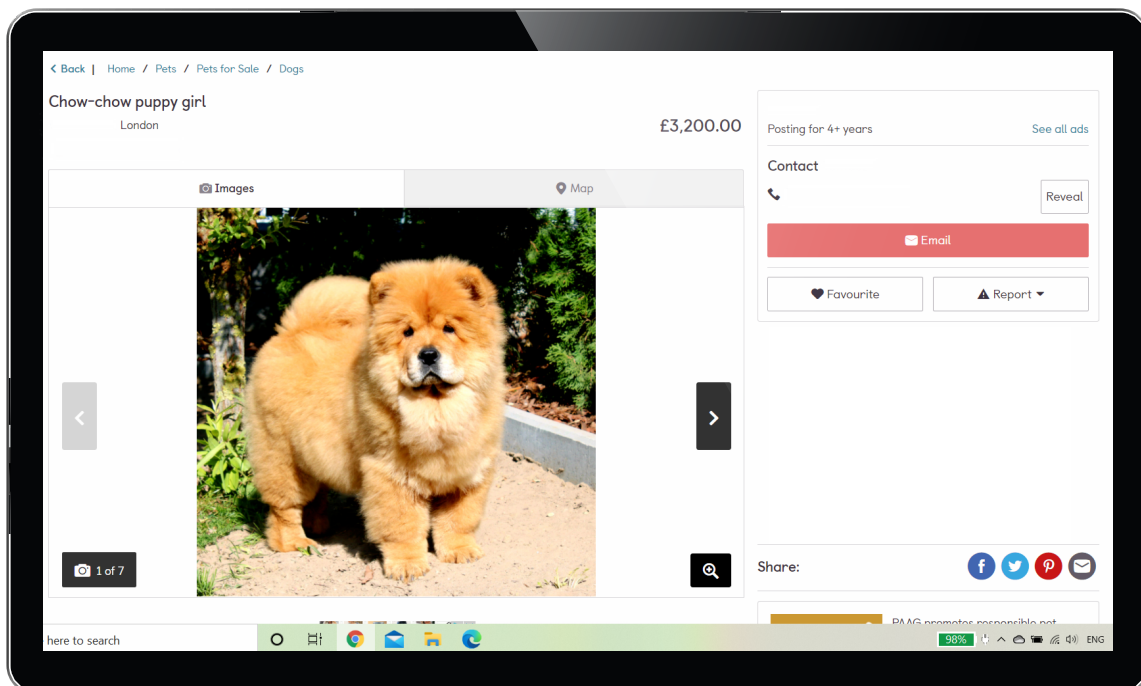
Dachshund from Hungary | For sale in Sheffield

This seller gets regular deliveries of puppies from Hungary but has little control over the breed or sex. She said that deliveries were usually made every week or two so she would keep the researcher’s number and get in touch when something was available. A copy of the passport was requested but the seller was reluctant to share it because she said she had another buyer lined up.

Case study 8

French Bulldog from Poland | For sale in Glasgow

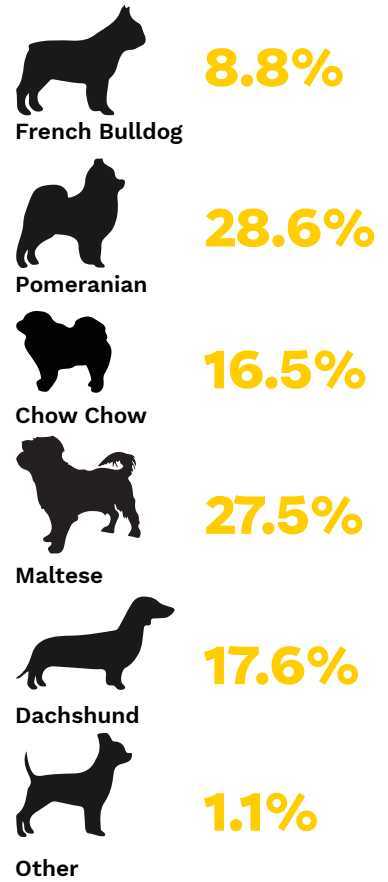
The seller of this puppy was very evasive on the phone and when a copy of the passport was requested, the seller said they would not provide this until the puppy had been viewed. To add to the researcher’s suspicions, the seller even offered to deliver the puppy to an address some 130 miles away. Although during the height of the COVID-19 restrictions, breeders were advised to drop off puppies wherever possible, this research was done at a time when such restrictions weren’t in place. Usually, offers of delivery such as this are a sign that something is not right.



Locations where adverts for imported puppies were found



Share of adverts found by breed



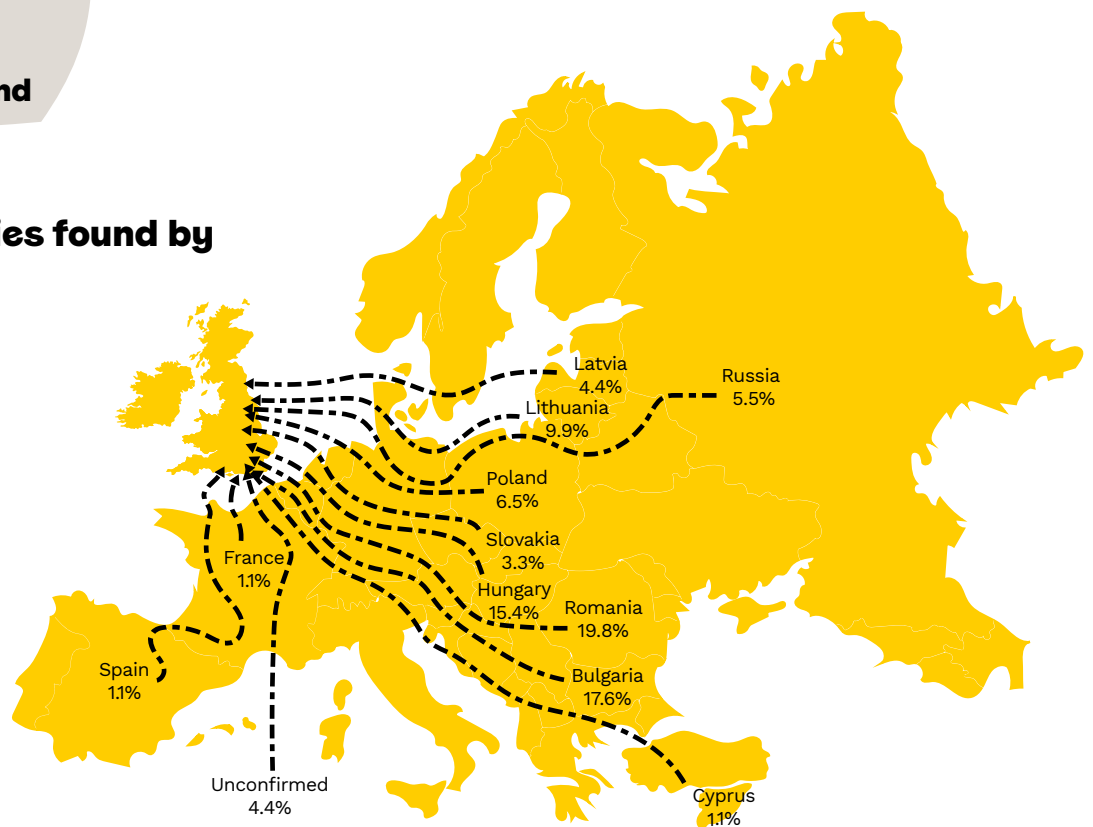
14%

of adverts reviewed were for imported puppies, this increased to

29%

of adverts in England

Share of puppies found by origin country



Advice to buyers

Although none of the original advert text mentioned that the puppy was an import, many of the sellers were happy to share that the puppies had been imported when questioned further, with some even using this as a mark of quality. When Dogs Trust carried out similar research two years ago, sellers were reluctant to say if puppies had been imported possibly as a result of advice we had been giving advising against buying puppies which came with a pet passport. The shift back to being happy to disclose when puppies have been imported perhaps reflects the fact that during lockdown demand for puppies has been so high that buyers are happy to look further afield and sellers are willing to take more of a risk for more profits.

However, whilst it is legal to import puppies to sell in the UK, this is only the case if they are correctly imported under the commercial movement legislation (the Balai Directive). It is likely that many of the puppies found for sale online had been imported on the Pet Travel Scheme which is designed for family pets. Importing puppies for sale under this legislation is illegal and importers are also evading HMRC by choosing this route.

Shockingly, in many cases, the puppies being advertised for sale were too young to have been imported legally under the Pet Travel Scheme or Balai Directive.

This has worrying implications for puppies' welfare and for the control of disease.

To travel to Great Britain from countries within the EU a puppy must be a minimum of 15 weeks of age. This means that the puppy receives a rabies vaccine at a minimum of 12 weeks of age, followed by a 21 day wait period after the vaccination date. For a puppy from an unlisted Third Country, such as Serbia, to comply with EU pet travel rules they must be at least seven months of age on arrival. This allows for the additional requirement of a rabies blood (titre) test to be carried out not less than 30 days after vaccination and three months before the date of travel to an EU country.

The presence of a passport and on a few occasions a health certificate from a vet in the country of origin was used by sellers to give the impression of legitimacy. Closer examination of the paperwork often revealed anomalies such as dates of birth not matching the story being told, but it is likely that some buyers might not notice this anomaly.



Buyers need to ask:

- Has the puppy been imported? (If yes, how old is the puppy? And does it have a passport?)
- Did you breed the puppy yourself? (If not - who did, where and why are you selling the puppy?)
- Was the dog born in city/country of advert? (If not, where was the puppy born and how did he/she come to be with you?)
- Can you tell me about the puppy's parents/bloodline? (If not, why not?)
- Can I visit the puppy at home with his/her mum, more than once?
- What paperwork does the puppy come with? (Imports will have foreign vet records and probably a passport) Ask to see copies of these ahead of viewing.
- Ask about vaccinations - in particular rabies vaccination - and be aware that to legally come to the UK from an EU country the puppy must be a minimum of 15 weeks of age

Warning signs:

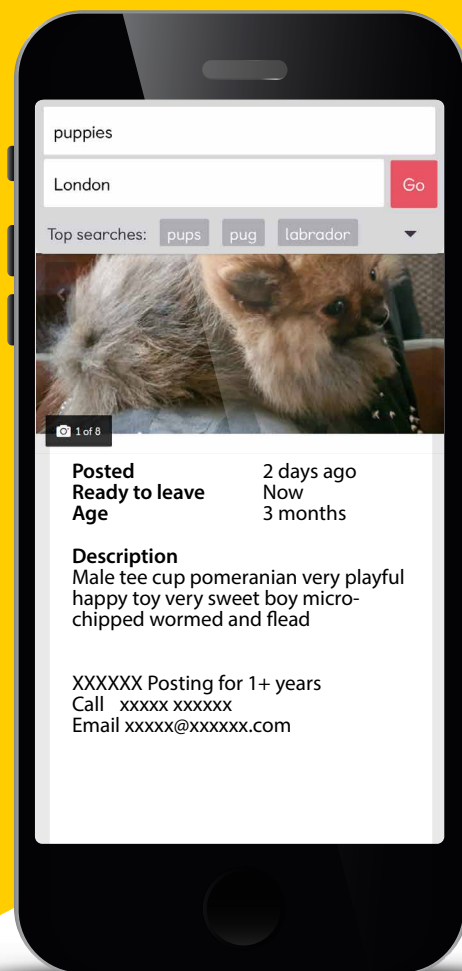
- Puppy cannot be viewed with their mum
- No image of mum on the advert, or only an image of her on her own without her pups
- It is stated that the puppy is an import but they are under 15 weeks of age
- Sellers able to offer multiple breeds for sale or offering to deliver the puppy
- Sellers claiming the puppy has a legitimate passport but failing to show a copy of it

Conclusion and demands

Comprehensive desk-based research between September and November 2020 confirmed to 'that the advertisement of imported puppies for sale online continues unabated particularly in England and also in Scotland. Whilst it is legal for puppies imported under the commercial Balai Directive to be sold in the UK, it is likely that a significant number of the puppies identified through this research had travelled via the non-commercial Pet Travel Scheme (PETS). Selling a puppy that has travelled to Great Britain via PETS is a fraudulent activity and even dogs being imported for rescue have to be moved under commercial rules (Balai).

Despite this, the sellers of imported puppies were often open about the puppies' import status when questioned – although none of the sellers in our research mentioned it in the original advert. In further conversation, many provided details of the country of origin of the puppies, transport methods and even used passports as a 'guarantee' of legitimacy. Yet inconsistencies with puppies' stated ages in relation to their rabies vaccination dates were common. Others did not bother to hide the young age of the puppy, simply relying on buyer ignorance about the legal age for importation.

Some sellers had created websites for their imported puppies and ran 'pop-up' pet shops in UK cities. Advertisers ranged from small-time family sellers to highly polished individuals with impressive sales pitches.



Our priority recommendations for the Government are:

- 1. Raise the minimum age for puppies to be imported into the UK to six months to help make them less desirable. Dogs Trust supports reintroducing a requirement for a rabies blood (titre) test before entry into the UK, together with a wait period post vaccination which is in line with the incubation period of rabies. This means that the age at which puppies could legally enter the UK would be increased to six months.**
- 2. Bring in tougher penalties for smuggling pups to deter deceitful sellers. This is already within the gift of Government and could be implemented immediately. Only a handful of puppy smuggling cases have ever been prosecuted and you can get a longer sentence for smuggling cigarettes than you can for smuggling puppies.**

Dogs Trust

Dogs Trust is the UK's largest dog welfare charity caring for around 14,300 dogs at its network of 20 rehoming centres throughout the UK and one in Ireland. We will never put a healthy dog to sleep. Our mission is to bring about the day when all dogs can enjoy a happy life, free from the threat of unnecessary destruction. Dogs Trust is a registered charity in England [227523], Scotland [SC037843] and Ireland [CHY16218].

Tracks Investigations

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

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