

THE PUPPY SMUGGLING SCANDAL

**An investigation into the illegal entry of dogs
into Great Britain under the Pet Travel Scheme**



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FOREWORD

Adrian Burder, Dogs Trust Chief Executive



As a nation that loves dogs we know the lengths people will go to in order to get the perfect puppy – but few would expect their young pet to have travelled over 1,250 miles to reach them (see map p25). Far fewer would expect their illegally transported puppy to come with a fake passport. Even fewer still would consider that their new pet could be carrying a potentially lethal disease. No one would believe that this is happening every day with Government knowledge.

However, as the following evidence demonstrates, puppies are being trafficked¹ illegally into the UK without the required vaccinations on a daily basis. This report exposes both the risks to animal welfare and to human health.

Dogs Trust, along with our animal welfare colleagues, highlighted to Defra the unintended consequences of the changes to the Pet Travel Scheme in 2012 as it became obvious that unscrupulous commercial dealers were trafficking puppies into the UK mainly from Eastern Europe. Chief Veterinary Officer, Nigel Gibbens, asked us for the evidence. After an in-depth six month investigation we have this and, depressingly, we didn't have to look very hard to find it. Our investigation focused on two countries, but our contacts throughout Europe stressed this is an escalating issue for them too. Six vets in Lithuania and Hungary admitted falsifying the information on pet passports and fifteen breeders or dealers we met in both countries confirmed they regularly transport underage puppies into the UK.

This report is critical reading for Defra², APHA³, Trading Standards, Eurotunnel, the ferry companies and veterinary authorities, as well as for the European Commission. This issue can no longer be dismissed as anecdotal or small scale, nor can the changes to the Pet Travel Scheme coming into force on the 29th December 2014 be regarded as a solution.

This is not a scaremongering cry about the risk of rabies to the UK but an evidence based report detailing the ease with which illegal puppies can be transported across Europe and can enter the UK. As a welfare organisation we find the breaches to the Welfare of Animals [Transport] [England] Order 2006 abhorrent. Puppies as young as six weeks are separated from their mothers. They are forced to travel over 1,000 miles within a couple of days in suitcases or unsuitable containers, to be sold without the correct health vaccinations. Surely not a suitable start in life for "man's best friend"?

However, we are fully aware that the breaches to The Animal Health Act [1981] are the more attention grabbing points for Defra. We ask the department to address with urgency our recommendations in the report.

A handwritten signature in black ink, appearing to read 'A. Burder'.

Adrian Burder

EXECUTIVE SUMMARY

Dogs Trust has carried out an in-depth six month investigation into the trafficking of puppies from Eastern Europe into the UK. The investigation focused on the puppies travelling into Great Britain under the non-commercial Pet Travel Scheme [PETS]. The numbers of animals coming in under PETS from Eastern Europe has increased rapidly since 2012 when changes to the legislation made it easier for people to enter Great Britain with puppies. **According to Defra the number of dogs entering Great Britain via PETS rose by 61% in the first year when controls were relaxed. Just 2.5% of pets were found to be non-compliant with PETS in 2012. This does not account for any of the non-declared smuggled dogs.** Our investigation shows the ease with which dealers, especially those in Eastern Europe, can evade or fool customs officials since the introduction of PETS, as these figures from Defra suggest:

Between 2011 and 2013 the number of dogs entering the UK from Lithuania has increased by 780%; in Hungary a 663% increase in dogs travelling under PETS into the UK was recorded⁴. Worryingly, this increase only accounts for dogs that are declared; it does not account for the number of dogs that are smuggled into the UK.

The impact of these changes and the increased volume of puppies entering the UK illegally⁵ have worrying implications for both the puppies' welfare and for the control of rabies and the tapeworm *Echinococcus multilocularis* UK, as many puppies are imported from countries that are classified as having rabies. Defra admitted in March 2013 that something needed to be done, yet it will have taken 21 months for any changes to the PETS to be introduced and Dogs Trust believes the proposals are nowhere near sufficient to tackle this growing problem. [See page 8.]

Our investigation reveals how **the PETS scheme is being used as a cover by commercial dealers from Hungary and Lithuania on a regular basis to illegally import puppies into the UK.**

These dealers were aided and abetted by unscrupulous vets in Eastern Europe, who, in collusion with the dealers, are prepared to issue pet passports with falsified data. Passports are issued by vets for puppies they have not seen; the age of puppies are changed to evade contravening PETS; dogs banned under the Dangerous Dogs Act are being brought into the country; and false vaccination stamps are added indicating rabies vaccinations had been given to puppies when they had not actually been administered. Unlike rabies, there are no initiatives to control *Echinococcus multilocularis* in countries where it is endemic.⁶ Dogs Trust wonders whether an individual that is prepared to falsify rabies vaccinations would bother with tapeworm treatment or measures to prevent other diseases?

Dogs Trust's evidence also reveals the ineffective controls at UK border ports which allows this illegal, commercial trade of puppies to enter the UK almost unhindered. This is especially so during the weekends when there are no APHA or Trading Standards personnel on physical duty at the main ports of entry such as Dover and the Eurotunnel. Trading Standards personnel are not available to assist out of hours. Wise to this knowledge, many dealers we made contact with travel with puppies over the weekend.

Transporters are rarely stopped, and if they are caught travelling with incorrect paperwork there is no penalty. They are simply made to return to where they came from. The likelihood of their paperwork being questioned is low and a search of their vehicle extremely unlikely. This means they can declare up to five puppies whose paperwork may get checked, then have a further undisclosed number of puppies hidden in their vehicle which will escape any scrutiny.

According to Defra...



increase in the number of dogs entering Great Britain via PETS in the first year after relaxation of controls



increase in Lithuanian dogs travelling under PETS into Great Britain between 2011 and 2013



increase in Hungarian dogs travelling under PETS into Great Britain between 2011 and 2013

Dogs Trust's investigation reveals...



...used as a cover to illegally import puppies into the UK



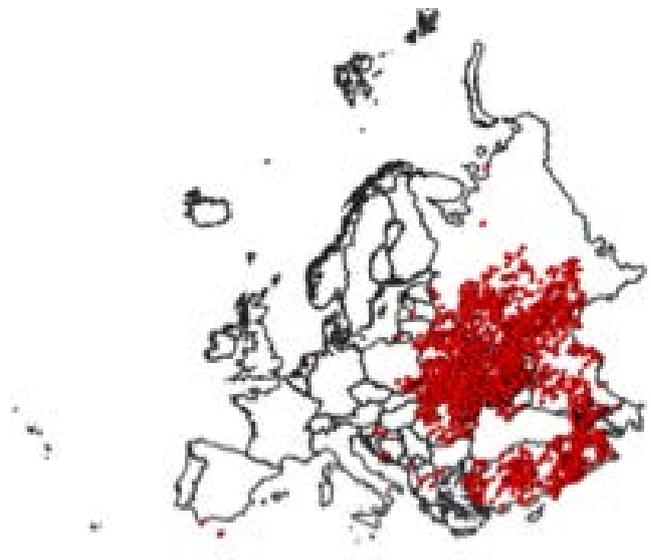
Ineffective controls at UK border ports

This issue is not one that Defra can claim to be unaware of. Dogs Trust has met with Defra's Chief Veterinary Officer to spell out our concerns and the issues; in March 2013 a Channel 4 Dispatches documentary in tandem with Dogs Trust highlighted to Defra the growing issue with PETS being abused by commercial dealers; in March the RSPCA detailed the growing risks in their report 'Pushing at an open door – how the present UK controls on rabies are failing'; in the same month Jim Fitzpatrick MP used a Ten Minute Rule Bill in the House of Commons to discuss measures to curb the illegal trade in puppies; in July 2014 ITV Tonight also highlighted this issue to Defra; quarantine kennel owners have highlighted the increased numbers in illegal puppies they are having to deal with; and in September the BBC exposed the welfare issues and continued trade in illegal puppies from Eastern Europe. Despite these warnings, Defra has failed to stop the puppy smugglers. The run up to Christmas will see a surge in demand for puppies and the Eastern European dealers will take full advantage of the lack of border controls to meet this market.

It is not acceptable to entrust the responsibility of keeping the UK rabies free to the ferry companies or Eurotunnel check-in staff. It is not realistic to expect frontline staff to carry out preventative measures in addition to their primary function. In addition, it is unrealistic to expect non-trained personnel at the ports to be able to differentiate between the age of a 10 week and 15 week puppy but this, along with a comprehensive series of checks, is what is urgently required. Not just a perfunctory check to see that the microchip number on the passport is the same as the one showing on the scanner.

Finally, **PETS is directly leading to welfare abuses:** both of the breeding bitches in the Eastern European puppy farms it allows to stay in business; and the puppies transported in horrific conditions for up to 48 hours to reach the UK. To use an international comparison, data collected by the Belgian government over the course of five years showed the mortality rates of young dogs imported into Belgium to be significantly higher than for dogs bred in Belgium.⁷

Cases of rabies in domestic dogs –
Europe 2012 – 2014



Summary of key findings in the report

- Breeders and dealers from Lithuania and Hungary using the Pet Travel Scheme (PETS) for the commercial importation of puppies to the Great Britain.
- Unscrupulous vets falsifying data on pet passports for PETS.
- Breeders and dealers from Lithuania and Hungary supplying young puppies under the legal age they can be imported under PETS on a regular basis to Great Britain, thus potentially rendering their vaccinations against rabies invalid.
- Ineffective border controls and enforcement of PETS at Great British ports.
- Little or no sharing of intelligence amongst key agencies.
- Lack of sufficient penalties to deter the illegal trade.
- Eastern European dealers selling underage puppies in the UK with falsified passports and without the correct vaccinations via internet sites.
- Dover ferry operators confirm that APHA operate an on-call system but have been informed that an on-call officer will only attend if there is a welfare concern. Clearly this does not prevent abuse of the Pet Travel Scheme in respect of commercial imports of puppies.
- APHA staff do not usually work at weekends and many ports within the UK do not have a continual presence. Both APHA and Trading Standards state that Trading Standards rely upon APHA to provide information to enable them to act. Clearly this cannot happen if APHA are not present and Trading Standards only have a telephone service running out of working hours.
- Puppies are bought at markets, so increasing risk of disease coming into the country.

Summary of key actions from on-the-ground investigative work

- Filmed 15 breeders/dealers who had sold underage puppies ranging from 7 -12 weeks to the UK.
- Filmed four vets from Lithuania and two vets from Hungary who admitted falsifying pet passports.
- Purchased pet passports with false birth dates and all vaccinations, including rabies, from a vet for 'fictitious puppies'.
- Filmed breeder and dealer explaining how easy it is to bring illegal pedigree Pit Bull Terriers into the UK.
- Purchased a puppy from an online advert in the UK who had been brought into the UK from Lithuania at just ten weeks old, without a rabies vaccination.
- Purchased two puppies in Hungary from a breeder who provided passports with falsified dates of birth and fake rabies vaccination details. These puppies were responsibly rehomed locally in Hungary.



DISPATCHES ASKS:

"Was it predicted that there would be this large increase in puppies coming from Eastern Europe?"

CHIEF VETERINARY OFFICER NIGEL GIBBENS RESPONDS:

"No it wasn't predicted so now we need to deal with it."

DISPATCHES ASKS:

"Isn't it just simply that the pet passport scheme is too open to abuse?"

CHIEF VETERINARY OFFICER NIGEL GIBBENS RESPONDS:

"Yeah, unpredictable things happen and why there is this big market for puppies might be due to the economic situation as well as the potential source - certainly to do with people not being wise about their purchasing. We now know where we are. The important thing now is that we act on that knowledge."



THE EFFECTS OF THE CHANGES TO THE PET PASSPORT SCHEME

The changes coming into force on 29th December 2014 is a clear acknowledgement that there is an issue with the current PETS. However, without the other recommendations we have outlined in this report, these changes are inadequate and will not solve the problems we have highlighted.

The main issues identified are underage puppies (i.e. significantly less than 15 weeks old); puppies imported with false paperwork⁸ (therefore unlikely to be vaccinated against rabies and possibly presenting an *Echinococcus* risk) and puppies commercially imported under the guise of domestic pets when, in fact, they are to be sold commercially.

Strict controls are in place in respect of commercial consignments, and apart from the normal Pet Passport requirements, any animal imported in this manner would require a Health Certificate. One significant benefit of a Health Certificate is traceability in the event of a disease outbreak and obviously this does not apply to pet animals entering Great Britain under the Pet Travel Scheme.

Any pet passport issued after 29th December 2014 will require the name and address of the owner. It will not be practical for ferry operator check-in staff to adequately confirm that the movement of the animal is generated by the movement of the owner.

The lamination of important recorded information within the Pet Passport will help prevent fraudulent paperwork. However, passport issuing member states will need to control the supply and be aware of disproportionate numbers being issued to veterinarians.

It will therefore be harder for veterinarians to reuse rabies stickers as we witnessed in Lithuania and Hungary. However, passports could still be issued as is the case today – the only difference is that veterinarians may charge an extra premium to dealers and transporters for the issuing of passports. As our research shows some dealers have empty passports, stamps and microchips, so would still be able to complete the new passports themselves.

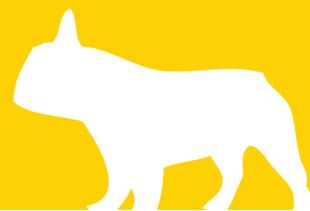
It is very likely that this may lead to a greater number of undeclared or under-declared animals and this is a problem that will need to be addressed in the Control Zone at Eurotunnel or upon arrival at sea ports within the UK. (It should be remembered that French law prohibits ferry operator staff from searching vehicles).

The changes present an excellent opportunity to tighten controls, but only if the legislation is fully embraced by Defra and adequate support and training is given to all parties involved in regulation and enforcement.

URGENT RECOMMENDATIONS

FOR DEFRA

- Based on the findings of this investigation, the Government should develop and implement an immediate action plan to address the abuse of PETS and the number of undeclared dogs entering the UK every day.
- The most radical solution to this problem is to call for puppies under the age of six months to be banned from entering Great Britain under PETS. An extension of the three week wait to 12 weeks, in line with the incubation period of rabies, would achieve this. This solution would strike at the heart of the illegal trade in puppies coming from Eastern Europe.
- To shift the focus on enforcement of PETS from ferry companies and Eurotunnel to government agencies. In the shorter term, full training should be given to specialist ferry operator staff operating from a dedicated area [Eurotunnel currently operates this system] and to improve the robustness of the checks which are carried out.
- The creation of a centrally accessible database logging pets' microchip numbers at the point of entry into the UK to be able to identify when and how a dog has entered the country at any point in the future. This is essential for traceability in the case of a disease outbreak.
- To bring quarantine regulations more in line with the incubation period of rabies i.e. three months.
- To work with the veterinary regulatory authorities within the countries that import puppies into the UK and the European Commission to crackdown on vets who falsify or supply fake pet passports.
- To actively encourage cross agency working and develop an intelligence system specifically to record and share data in respect of illegally traded commercial consignments of animals. This would enable APHA regional offices and regional Trading Standards Authorities to act in a cohesive manner. Similarly, if UK Border Forces have intelligence, there needs to be a way this data can be shared with the other agencies.
- Pet check-in staff should be able to contact and physically access APHA or Trading



Standards at all times, not just during office hours, to obtain guidance and relay intelligence.⁹ In tandem with the development of a shared intelligence system, this would enable the relevant UK Authorities to prevent non-compliant imports entering the UK.

- The introduction of a fixed penalty charge for those caught illegally bringing dogs into the UK.

FOR APHA

- APHA must target potential commercial puppy importers rather than carry out audits of ferry operator procedures, which largely result in only the declared travellers being stopped.
- A rigorous programme of vehicle spot-checks should be instigated and maintained at south east and east coast sea ports.
- To have an on-call vet able to respond to carrier queries about both welfare uncertainties or to assist with ageing a puppy if suspected to be under 15 weeks as part of closer checking of pet passport details.

FOR TRADING STANDARDS

- Trading Standards carry out enforcement in respect of APHA and illegal landings. It is understood that many Trading Standards Authorities do not operate out of hours or at weekends, and therefore no enforcement takes place out of normal working hours. It is essential that this is addressed if the non-compliant trade in animals is to be controlled.

FOR THE EUROPEAN COMMISSION

- The European Commission's Food and Veterinary Office (FVO) is responsible for checking the compliance of EU member states with the requirements of EU animal health and welfare legislation. Each year, the FVO develops an inspection programme. In future years, the FVO's inspection programme should include checking compliance with EU Regulation No 576/2013 on the non-commercial movement of pet animals.
- Registration of microchips on an accessible database and linked to Europetnet.

LONGER TERM SOLUTIONS

1. Investment in consumer education campaigns targeted at people purchasing dogs online rather than relying on welfare charities to carry out this work.
2. The EU needs to manage the spread of canine diseases across the EU from member states, which may require inspections of all puppies and dogs at each member states borders.
3. Update the rabies risk assessment model based on the increased trade of puppies and street dogs from Eastern Europe and include the threat of undeclared dogs in this modelling.
4. The EU and member states to introduce new higher standards for breeders within Europe that have the dogs' welfare at the centre for any regulation.
5. Mandatory identification and registration across all EU Member States.

A close-up photograph of a black and white French Bulldog puppy sitting on a green lawn. The puppy has large, upright ears and a white blaze on its face. A red, distressed-style stamp with the word "FAKE" in white, bold, uppercase letters is superimposed over the puppy's forehead and eyes.

FAKE

CASE STUDY 1

THE FAKE DOGS AND THEIR FAKE EU PASSPORTS



These pet passports were issued to two puppies, Mitsi and Charley, by a vet in Lithuania. They look real – indeed the passports ARE real. They state that the dogs are four months old, have been microchipped, have had rabies jabs and other inoculations, are ready to travel to the UK and would be waived through by customs officials into the UK.

However, these dogs do not exist – we made them up. To show how easy it is to obtain pet passports and microchips our investigators approached a vet in Lithuania posing as a commercial dealer and purchased the passports for £120. The vet asked us to destroy the passports once in the UK and even asked us to return the rabies stickers on the passport so that they could be used again as he had a shortage of rabies stickers. He told us how to insert and remove the microchips and suggested we crush them with a set of pliers. He did, however, advise us to get a rabies jab for the dogs once in the UK.

Our investigations can reveal that this is not an isolated incident. Six vets that we approached in Eastern Europe stated that they would supply us with falsified passports. Another vet in Hungary also issued us with passports (with all accompanying inoculations including rabies) for dogs that he had not seen. Most of the breeders and dealers that we met in Eastern Europe also stated that they could easily arrange for passports to be falsified by vets that they have regular dealings with.

CASE STUDY 2

THE LITHUANIAN PUPPY BOUGHT IN THE UK



French Bulldogs are one of the fastest growing breeds in popularity in the UK, with owners willing to pay up to £2,500 for one. Classified websites make it possible to buy any breed of puppy at the click of a button. Having identified an online dealer [UK seller 1] selling French Bulldogs for considerably less than this amount we targeted him as a potential illegal importer. Posing as a commercial breeder, we visited the dealer at his home where he had four French Bulldogs for sale along with a Toy Terrier. The dealer boasted that he brings between three to five puppies every week into the UK.

Three of the French Bulldogs had only arrived in the country the day before having travelled for over 1,200 miles in the back of a van from Lithuania. When asked initially about the age of the puppy that we wanted to buy, the dealer stated that they were four months old as per the details on the passport. The passports also mentioned that all dogs had had their necessary inoculations. When asked again if the details on the passport were accurate, as we were hoping to buy younger puppies in the future, he admitted that they were not, and indeed the puppies were younger than 15 weeks and had not had their rabies jabs. He advised us to go to a vet and get this done but warned that we should not take the pet passport with us to the vet to avoid complications.

The dealer stated that he normally supplies puppies from nine weeks old to the UK – but does ‘a little cheat’ with the passports to alter their birthdates. He also stated that the puppies do not have rabies vaccinations and advised us to get these done in the UK. Dogs Trust purchased a puppy from him and our veterinary team estimated that the puppy was underage at ten weeks old – too young for the rabies inoculation to be effective. The passport stated the puppy was a male when it was in fact a female.

Having reported our concerns to Trading Standards, the puppy was taken to the Animal Reception Centre in Heathrow Airport due to our suspicions that it was illegally landed. The quarantine vet team at the centre confirmed that the puppy was just ten weeks old based on its dentition and weight, so clearly the information on its passport was false. Blood tests taken from the puppy indicated it had no protection from rabies.

CASE STUDY 3

THE LITHUANIAN BREEDER IMPORTING ILLEGAL PIT BULL TERRIERS



Posing as buyers from Top Dogs Online, we targeted an established dealer and breeder [Lithuania Subject 2] in Lithuania who claims to be able to supply our especially created fake internet shop, www.topdogsonline.co.uk, with any breed of dog. On a tour of his kennels he showed us Rottweilers, Belgian Hunting Dogs and Pit Bull Terriers and explained that the Pit Bulls were pedigrees which he can easily bring into the UK by claiming on their paperwork that they are crossbreeds. He continued by saying that port officials were unable to tell the difference and admitted Pit Bulls were very popular in Birmingham. The Dangerous Dogs Act 1991 bans the ownership, breeding, sale and exchange, and advertising for sale of Pit Bulls, something the breeder was clearly aware of as Pit Bulls are also a banned breed in Lithuania.

CASE STUDY 4

PURCHASING PUPPIES IN HUNGARY...



Breeder showing newly obtained passports with all vaccinations



Breeder inserting microchip into puppy



Breeders puppy farm

Please see overleaf for case study details >

CASE STUDY 4

...WITH FALSE RABIES VACCINATION RECORDS

We met with a Hungarian breeder [Hungary Subject 1] and purchased two puppies aged 11 weeks for 90:000 HUH each [£230]. The breeder assured us that she could get the EU pet passports from her own vet without any difficulties.

The breeder inserted microchips into the puppies herself and then provided us with two new passports and vaccination booklets – **we now know that the data on these documents were completely false.** According to the passports, the puppies were 115 days old which is around 16 ½ weeks.

She confirmed that despite the papers saying otherwise, the puppies had not had a rabies vaccination and said we should get this done in the UK. She asked us to send the original green vaccination booklets back by post as she should provide them to the vet for withdrawal, so it could be assumed here that the breeder was trying to cover her tracks.

After purchasing the dogs and new passports we took the puppies to a reputable veterinary clinic for a health check and for their vaccinations. They have now been registered into the system with the microchips they were given. The vet that examined them said they were in good health and that in his professional opinion the puppies were only around seven to eight weeks old i.e. considerably younger than the age we were first told. These puppies have now been responsibly rehomed in Hungary.

The fake papers state the following:

These puppies were originally issued with birth dates of 15/6/2014 and 10/6/2014 on their vaccination records. To make them older, and therefore comply with PETS regulations, the vet then changed both dates of birth to 01/05/2014 on their pet passports.

Passport numbers: HU 14 1648908 and HU 14 1648909

Microchip Numbers: 900085000053186 and 900085000053172

Date of microchipping: 15/6/2014

Rabies vaccination Date: 1/8/2014

Tick Treatment Dates: 23/8/2014

Echinococcus Treatment Dates: 1/8/2014 and the second one: 23/8/2014.

There are another 2 vaccinations listed in the passports dated 15/6/2014 and 2/7/2014.

All of this data/information is completely false.

CASE STUDY 5

THE ALTERNATIVE CASE STUDY – DOGS TRUST AND IMPORTED DOGS

Dogs Trust routinely moves dogs between its 20 rehoming centres in the UK and its centre in Ireland in order to save the greatest number of dogs' lives. Although a charity, the law classifies Dogs Trust's work as commercial, so our dogs are subject to the conditions of the Balai Directive rather than PETS. As with any other dog entering the UK from another EU country for 'commercial' purposes, i.e. change of ownership, the dogs we rescue from Ireland need to be compliant with the Balai Directive. The charity has worked hard to ensure that all dogs travelling from Ireland to the UK are fully compliant, so they are vaccinated against rabies and travel with pet passports. Although Ireland is rabies free, Dogs Trust fully acknowledges its responsibility to import dogs safely and within the law.

This responsibility also extends to the dogs which enter our rehoming centres with foreign microchips. Although this is not definitive proof that a particular dog has originated in the country of the microchip, it cannot be ignored. Given the lack of traceability when a dog enters Great Britain with PETS, we have no knowledge if a stray or handover dog with a foreign microchip has entered the UK legally or not. Whilst the risks may be small, the implications of a dog carrying disease are huge. We cannot pass this risk on to our staff, other dogs in our care and ultimately the dog's new owner. Therefore, where we are unable to trace the previous owner of a dog [the regulations only require microchipping – not registration], we have started to carry out rabies serology on dogs we believe to have originated outside the UK. Equally, those dogs that we know have been outside the UK [excluding Ireland] will be blood tested for so-called non-endemic diseases. This is a costly procedure for the charity and extends the wait for the dog to get a new, loving home. If a centralised database of microchip numbers were to be created under PETS, we would have a far better understanding of the provenance and health status of these dogs.

In the last nine months we have also had stray dogs brought to our rehoming centres with foreign microchips and no way of knowing whether they entered the country legally. For example, at our Glasgow centre a dog arrived from the local pound with a Polish microchip which was not registered on any UK database and no indication of the source via Europetnet. The rabies serology undertaken indicated that the dog had been vaccinated so we were able to rehome it.

In 2012 Dogs Trust Leeds took in a puppy that was picked up straying by the local authority; the owner came forward and admitted that the puppy had recently travelled for four days from Slovakia by car and through Dover, and that no passport or microchip was issued.

The owner handed the puppy over to the local authority as he did not want to pay quarantine fees. The puppy was screened for diseases and served its time in quarantine before going to Dogs Trust Leeds for rehoming.

BACKGROUND

Legislation on the import of puppies into the UK

In January 2012 the rules for importing dogs into the UK, were harmonised with the rest of Europe. The new regulations mean that far younger dogs can now be imported into the UK as the wait to enter the UK from an EU country after a vaccination against rabies has been given is now just 21 days (a blood test is no longer required to confirm a response to the vaccination). The 21 day wait is to allow the vaccine to stimulate the immune system and is not associated with the incubation period of the disease – this is generally 2 -12 weeks, although it can be much longer.

The changes to regulations in 2012, and their successful implementation, very much depended on the new regulations being effectively enforced. Information found through our investigation shows that the lack of adequate enforcement at UK ports means that people are easily able to flout the systems, and puppies are being illegally imported on a daily basis.

Dogs that enter Great Britain, which are classified as non-commercial, will travel under PETS. Under PETS a maximum of five dogs can be imported per person. There are more stringent regulations for dogs that travel commercially. A consequence of the changes in 2012 has meant an increase in the number of dogs that travel under PETS, whilst there has been a decrease in the import of dogs for commercial activity. This strongly suggests that commercial dealers are exploiting PETS to transport puppies without detection.

Dogs entering Great Britain under PETS must abide by the following regulations:

- Obtain a pet passport.
- Dog to be microchipped (but no requirement to register on a database). The microchip must conform to the ISO 11784 15-digit microchip regulations and be capable of being read by a scanner compatible with ISO 11785.
- Dog to be clearly identified in pet passport (a photo can appear but is not a requirement), the microchip number must be indicated.
- After microchipping, the dog must be vaccinated against rabies – [at the moment the minimum age of vaccination can vary depending on the marketing authorisation of the vaccine in the country where it is administered].
- Wait 21 days following their rabies vaccination.
- Be treated for *Echinococcus multilocularis* (tapeworm) not less than 24 hours and not more than 5 days prior to arrival in the UK.

The paperwork on the pet passports must show:

- Microchip number, date of insertion (and location of the microchip on the animal).
- Date of vaccination.
- Vaccine product name.

- Date on which its booster vaccination is due (calculated by reference to the vaccine manufacturer's data sheet. The member states medicines board will determine the validity period based upon the risk of rabies in wild animals within its territory and the level of concern within that state).
- From the 29th December 2014 the pet passport will also need to record the details of the vet who has issued the passport and a 'valid from' date for the rabies vaccinations

Therefore, the minimum age of a puppy at time of import into the UK is three months and three weeks (ie; 15 weeks). This is 21 days after they have had the rabies vaccination, which they can have at a minimum of 12 weeks.¹⁰

At this age, it is hard for non dog experts to identify if a puppy is 15 weeks old or younger – especially as many will be crossbreeds which don't conform to a set weight or size, or will be small 'designer' breeds which are very hard to age.

At 15 weeks a puppy's adult teeth should be erupting. A dog expert or a vet would be able to tell whether it is likely to be younger than 15 weeks of age. A border control official will have little idea but will not be looking to verify the age of the puppy as this is not part of the PETS checking process. This is a significant issue as an underage dog is unlikely to have had a rabies vaccination, or if it has, the vaccine will not be effective.

Dogs entering the UK for commercial import must abide by the following regulations:

There are more stringent controls surrounding the commercial import of dogs. In addition to conforming to the non-commercial PETS regulations above, all dogs must:

- Come from a holding or business registered in the EU country of origin.
- Obtain a health certificate [issued by download from the TRACES website] for each group of more than five dogs. Each animal must be listed on the health certificate and a vet authorised by the competent authority must have carried out a clinical examination of each animal ensuring that they are fit to travel under Council Regulation (EC) No 1/2005. This takes place 24 hours before dispatch.

There are a few other conditions which also need to be met. The consignment will be entered on TRACES.

ORDERS AND DIRECTIVES

The Rabies Importation Order (RIO)1974 prohibits entry of rabies-susceptible animals into Great Britain unless certain conditions have been adhered to. PETS travel scheme underpins this as well as other regulations for importing dogs commercially. Consignments (not travelling under the Pet Travel Scheme) should be notified to the local APHA office responsible for the destination premises at least 24 hours before the expected arrival and, if a certificate is required, it should be entered onto the TRACES system.

TRACES (Trade Control and Expert System) is a web-based veterinarian certification tool used by the European Union for controlling the import and export of live animals and animal products within its borders. TRACES sends an electronic message from the departure point to the transfer point and the arrival point to notify that a consignment is arriving. It enables consignments to be followed. Rejected consignments and the reason for their rejection is placed on file.

BALAI Directive – movement of rabies susceptible animals. The Balai Directive 92/65/EEC provides a framework of rules for trade between member states in live animals and also imports from third countries, concerning those species that are not covered elsewhere by EU legislation. These regulations apply to the movement of rabies susceptible animals, and they cover everything which is not covered by RIO. In order to be BALAI compliant, the consignment must also be RIO compliant.

TARP (Trade in Animals and Related Products). These regulations underpin BALAI and are related to the commercial movement of animals.

The economics of the trade – smuggling puppies instead of cigarettes

The trade of puppies via PETS may appear to the outsider to be small scale and not particularly significant, however, once one delves into the economics of the trade a bigger picture emerges, which explains the financial appeal of importing puppies into the UK.

Popular breeds of puppies such as French Bulldogs and Pugs are regularly advertised on internet sites from around £750 each. If a dealer imports five puppies at a time with one passenger, the potential income for one consignment of puppies would be £3,750. With two passengers that means ten puppies could be transported so the income rises to £7,500. The cost to the dealer of purchasing a dog, arranging for a passport and transportation to the UK would be around £200. Therefore, the dealer is left with a healthy profit of £550 per puppy, or around £2,750 per single consignment of five puppies. Some dealers we met over the course of our investigation boasted that they travel each week, hence their potential profits could reach well over £100,000 per year.

The main advantage to the dealer is that there is very little risk involved – unlike smuggling cigarettes into the UK. We estimate that the profit generated from one consignment of puppies is equivalent to that of smuggling thousands of cigarettes.

The failings of current inspection regimes at UK ports

The importation of puppies mainly occurs via Dover and Eurotunnel due to their location in relation to East European departure points, the frequency of departures and the relatively short crossing time. These factors have resulted in these routes becoming the most significant point of entry into the UK for persons travelling with pets and those trading in puppies.

At the ports, the current inspection regime is primarily carried out by the individual ferry operator and was conceived upon the introduction of PETS. The procedures introduced at the inception of the scheme were relatively simple and largely relied upon the honesty of the travelling public, as they do today. French law prevents ferry operator staff from searching a vehicle and the checking regimes of Dunkirk and Calais are based upon declaration at the check-in booth. The microchip reading is carried out by the person responsible for the animals and the scanner is then passed to the individual within the booth. The work-station of the individual within the booth, and the

position of the rear of the vehicle in relation to this, prevents visual inspection. At no time during our investigation were ferry operator staff observed leaving their booths to check vehicles.

The check-in procedure at Eurotunnel (France) requires the person travelling to remove the animals from the vehicle and take them to the check-in building where the pet passport is checked and the person responsible for the animals carries out the microchip reading below counter top height. Therefore staff cannot see the actual scan taking place. At no time during our investigations have check-in staff been observed leaving the check-in building to count the number of animals in a vehicle.

Should a traveller choose not to declare the presence of animals in their vehicle and proceed through the automated check-in, there is a very strong possibility that the animals would not be discovered. If they were to be, there are no penalties and in the event of non-compliant animals being present, the traveller would be prevented from embarkation and escorted from the site. Should a problem occur which results in an animal being refused travel, the transporter can attempt to travel with another ferry operator

Clearly these methods of checking, agreed with Defra, do not take into account the under-declaration of animals carried, nor transporters choosing not to declare animals at all. The check-in procedures utilised do not prevent obviously under-age animals being transported as animals are not checked against their passports. The standard set by Defra dictates that pet passports are checked for documentary compliance and that no attempt is made to link the animal to the passport other than by their microchip number. Our research leads us to believe that microchips may be implanted in a manner to facilitate easy removal once in the UK [allowing the 'compliant' passport to be re-used] or attached to a collar in an even simpler evasion.

The ferry operators are operating in a commercial capacity and are not best suited to carry out this work on behalf of Defra. During busy periods there will be considerable numbers travelling [Dunkirk and Calais do not operate a check-in dedicated to pets] and the ferry operators staff will be working under considerable pressure to maintain a steady throughput of vehicles in order to maintain scheduled departures.

Enquiries have established that the Dover APHA office is currently manned between the hours of 08:30 and 01:00 from Monday to Friday, with no attendance at weekends.

Surveillance carried out at the port indicates that the greater flow of East European 'post bus' traffic is from 18:00 on Friday until approximately 12:00 Sunday and these vehicles are mainly responsible for the importation of puppies into the UK. Our surveillance at Dover confirmed the information gained from dealers during our investigations in Lithuania and Hungary – namely puppies were scheduled to leave Eastern Europe on Thursday to arrive in the UK on Friday evening and Saturday morning when there is the least chance of being stopped.

Current figures from Trading Standards authorities throughout the UK and the ferry operators¹¹ confirm that the greatest volume of trade in puppies originates from Lithuania and that these vehicles do not begin to arrive at Dover or Coquelles until the early hours of Saturday when the Dover office is not manned. The arrival time at the Channel ports is dependent upon departure



time and enquiries in Lithuania have confirmed that arrivals in the UK are scheduled for Saturday.

APHA, the agency representing Defra at the Port of Dover, is set up in the model of a Regulatory Authority and maintains that the responsibility for enforcement action with PETS rests with the Local Authority. Kent Trading Standards does not operate an out of hours attendance policy and therefore no enforcement activities will take place between Friday evening and Monday morning, or after normal working hours Monday to Friday.

The European trade in puppies necessitates that they are between 8 to 12 weeks when sold to compete with the UK market, and it is commonplace to falsify ages in the pet passport in order to allow them to travel. This report includes examples of veterinary surgeons issuing blank passports to enable the exporter to complete them as required and enter whatever particulars they wish. Often pure bred puppies are described in the pet passport as “mixed breed” in order to make ageing (according to breed standards) less certain.

Defra relies upon the ferry/shuttle operators to carry out all checks in respect of PETS and these checks consist of a basic documentary check, to ensure the appropriate treatments have been certified, and a check to ensure that the microchip (scanned by the person travelling with animal) is as recorded in the passport. No further checks are carried out. APHA carry out a basic audit of the ferry/shuttle operators checking procedures (3% of declared animals). Should they discover a serious breach of the Regulations they are required to contact Kent Trading Standards for enforcement action to be taken. Kent Trading Standards are not available out of normal working hours.

APHA do not carry out checks at Eurotunnel (France) on a regular basis, Kent Trading Standards do not travel to Eurotunnel and both authorities maintain that they do not have the powers to take action outside of the UK, notwithstanding the Sangatte Protocol. Any breaches of PETS, including the large scale importation of puppies, will largely pass through Eurotunnel without challenge and after 01:00 and during weekends the same applies at Dover.



THE FIELD INVESTIGATION APPROACH AND INVESTIGATION METHODOLOGY

The following points were identified as the main objectives of Dogs Trust's investigation:

1. Identify the main source countries for puppies entering the UK and obtain documentary evidence of puppies being sold and transported to the UK from these countries.
2. Gain an understanding of the border control operations at Dover and Eurotunnel.
3. Obtain documentary proof in the UK of abuses of PETS by seeking out illegal dealers who are selling puppies in the UK.

A scoping project was initiated at the start of the year looking into the issue of the imports of dogs into the UK. The scoping project identified the following ways in which PETS could be abused by commercial transporters:

- It is possible to bring five puppies per person into the UK – as pets.
- Two to three people in a van can bring in 10-15 puppies legally (five each) under PETS even if they are to be sold they should be declared under the Balai directive).
- Once in the UK, these puppies can then be sold by disposing of the paperwork and pretending the dog is from the UK.
- Bringing in underage puppies and claiming they are older to fulfil PETS criteria of 15 weeks of age. These puppies are hidden in the back of a vehicle and not declared.
- Falsifying paperwork, such as pet passports.

Further to the completion of the scoping project, two countries, Lithuania and Hungary, were identified as major targets to investigate due to both countries having a risk of rabies, as well as currently importing a significant number of puppies to the UK under PETS. There has also been a dramatic increase over the last couple of years of puppies entering the UK under the PETS from these two countries.



THE PUPPY SMUGGLING SCANDAL

In order to engage with potential breeders, dealers, transporters and sellers we created a false business persona; Top Dogs Online – the UK's favourite site for toy and small breed puppies. www.topdogsonline.co.uk



TopDogsOnline purported to be a UK based company selling puppies and small breed dogs via the internet to UK buyers.

The cover story employed was that Topdogsonline wanted to source puppies from Lithuania and Hungary in order to sell on to prospective buyers in the UK.

We targeted breeders and dealers that had already supplied puppies to the UK in an effort to understand how these dealers/breeders were importing puppies and to see if they were abiding by the relevant legislation – specifically in relation to the age of puppies entering the UK and whether the pet passports issued with the puppies were real.

FINDINGS FROM THE RESEARCH IN LITHUANIA AND HUNGARY

Investigation Methodology

In order to achieve the objective of providing evidence that puppies from Lithuania and Hungary were being exported to the UK under the age of the permitted 15 weeks, we set up a fake dealership and website (www.topdogsonline.co.uk) in order to engage with potential breeders, dealers, vets and transporters from Lithuania and Hungary.

Meetings were set up with several dealers and breeders prior to the field investigation. Further meetings were held with dealers/breeders/vets/transporters, which arose through contacts made at markets and through further conversations with the original dealers/breeders.

All meetings were recorded using covert video equipment.

DOGS TRUST INVESTIGATIONS IN LITHUANIA

Investigation Period: July 2014

SUMMARY OF MAIN FINDINGS

1. Filmed meetings with 11 breeders and dealers – nine of these breeders and dealers had previously sold puppies to the UK.
2. Of the 11 breeders and dealers - nine would/have sold under-age puppies to the UK, ranging from seven to twelve weeks old. These breeders/dealers said they could get vets to falsify pet passports.
3. Filmed at two markets which were selling puppies.
4. Filmed meetings with five vets. Four of the vets admitted falsifying papers. One vet sold our investigators pet passports and microchips without seeing any dogs.
5. Filmed two transporters who confirmed the trade in underage puppies.

SELECTED CASE STUDIES WITH BREEDERS, DEALERS, VETS AND TRANSPORTERS

MEETINGS WITH BREEDERS / DEALERS

LITHUANIA SUBJECT 1 ... TIME: 18.45 ... DATE: 05/07/2014

Key facts from meeting:

- He tells us he is a registered breeder.
- He sells French bulldogs, Chihuahuas and Toy Terriers.
- He claims to have 25 breeding bitches who each have one litter per year.
- Puppies need to be weaned at eight weeks. They then have the vaccinations and get passports which takes three weeks.
- He says the minimum age he can sell us puppies is 11 weeks.
- He uses many different vets, he showed us some passports and the vets' names were included.
- The document/passport costs are 150 Litass [Approx. £40].
- The age of the puppies can be fixed to make the puppies three or four weeks older by the vet.
- He has vaccinations for the puppies at his premises which he showed us and he administers these himself with the exception of the rabies injection, which the vet does. The vet simply stamps and signs the papers for the others.
- Transport costs are around £40 by post van or minibus. He says the puppies would not be his responsibility once they leave his premises.



Dealer showing passports



Breeders kennels

LITHUANIA SUBJECT 2 ... TIME: 14.50 ... DATE: 06/07/2014

Key facts from meeting:

- He is an established breeder and dealer, he claims to be able to supply whatever dogs we want to buy. He showed us some dogs in his kennels including Rottweilers, Belgian Hunting Dogs and pedigree Pit Bulls. The Pit Bulls are pedigree and says he has papers for them. He claims he can get them into the UK without any problem by saying they are either mongrels or Argentinian Pit Bulls which look very similar.
- He says the Pit Bulls are very difficult for customs officers to differentiate between mongrels and Argentinian Pit Bulls.
- He says they are very popular in Birmingham.
- In business for 25 years /15 years in the UK based in Kent.
- He can arrange transport for puppies at £80 per dog + £50 for vaccinations, passport etc.
- He says we must pay 50% deposit and the final cash payment on delivery.
- Transports leave Lithuania on Thursday and Friday.



Breeder at kennels



Dogs at kennels

LITHUANIA SUBJECT 3 ... TIME: 13.30 ... DATE: 07/07/2014

Key facts from meeting:

- She is a dealer as opposed to a breeder. She buys puppies from breeders in Lithuania and sells to clients in the UK. She is based in Cambridgeshire.
- She says she can supply puppies at 12 weeks old without any problems. They are all vaccinated and have European passports. When asked about quarantine she replied there is no quarantine. The transport costs are £100 per dog and the transport leaves Lithuania once or twice a week.
- Transport is done on Thursdays and Fridays, arriving in the UK on Saturday afternoon or evening.
- She can deliver anywhere in the UK.

LITHUANIA SUBJECT 4 ... TIME: 14.30 ... DATE: 08/07/2014

Key facts from meeting:

- These are registered breeders and they have several breeding bitches with puppies.
- They were concerned that because we were from the UK, we would not like the conditions of the kennels – the conditions the dogs were kept in were poor.
- They are already supplying puppies to the UK.
- We were shown two German Shepherd puppies at seven weeks old which we could buy in two weeks' time at nine weeks for £90 plus £45 for passports and inoculations. They could be in the UK at nine and a half weeks old.
- They use a vet who says he can issue passports without the dogs having had their vaccinations.
- The puppies sold at nine weeks had their date of births changed on their passports to pass them off as being older in order to appear compliant with PETS
- Puppies can be issued with a passport at nine weeks without having had a rabies vaccination, but the sticker and vet's stamp will be in the passport.
- The breeder stated that the vaccination is not done because if it is done earlier than three months it is not effective.



Breeder's run-down kennels



Breeder at kennels



Dogs at kennels



LITHUANIA SUBJECT 5 ... TIME: 21.30 ... DATE: 08/07/2014

Key facts from meeting:

- He is a dog breeder and claims to have won trophies at Crufts and other dog shows. He now imports puppies from Belarus, Russia and Poland.
- 20 years of experience in selling puppies.
- He can find us any puppies we want, including Toy Terriers, Pomeranians and French Bulldogs.
- He sells puppies from six weeks old but advises us that nine weeks is a better age for puppies going to the UK.
- He sells puppies in the UK, Denmark, Norway and Sweden.
- He has a vet that can sort out all necessary paperwork, passports and inoculations.
- His drivers go regularly to the UK on Tuesdays and Fridays.



Dogs at kennels



LITHUANIA SUBJECT 6 ... TIME: 14.45 ... DATE: 09/07/2014

Key facts from meeting:

- He is a breeder and dealer of mainly larger breeds of dog.
- He has 80 bitches in total, 20 are kept at premises in town and another 60 in kennels he has in a forest 15km from his house. He took us there to see his breeding bitches.
- He has a vet based locally that supplies him with inoculations and passports.
- He has empty passports and microchips at his house which he showed us.
- When the vet is not around he can do his own documents and has a stamp from his vet.
- He sells puppies at six weeks, but advised us that selling at eight weeks is better for dogs travelling to the UK.
- He can source puppies from Poland and Latvia as well as Lithuania.
- The dealer had some six week old puppies for sale immediately and more at three weeks old that he could sell to us in a further three weeks' time.
- The dogs we saw in the kennels at his forest location are kept in very basic conditions and did not look as if they are ever exercised.



Breeder's kennels



Breeder showing pet passports

LITHUANIA SUBJECT 7 ... TIME: 12.45 ... DATE: 11/07/2014

Key facts from meeting:

- She is a breeder of small dogs including French Bulldogs, Chihuahuas, Poodle crosses, Pugs and Toy Terriers. She has been in the business for five years.
- She supplies puppies to the UK on a regular basis.
- She confirmed that she could supply TopDogsOnline with puppies under 12 weeks without any problem. Indeed, she has no problems supplying puppies as young as seven to eight weeks as she hadn't had problems in the past doing this.
- She has her own vet that can take care of passports.
- She has told us to **keep the passports so they can be used again**, simply peel off the stickers.
- She transports puppies to the UK mainly on Friday and Saturdays.

MEETINGS WITH VETS

LITHUANIA VET 1 ... TIME: 12.10 ... DATE: 10/07/2014

Key facts from meeting:

- He is happy to issue pet passports for puppies **under 12 weeks old**.
- He will write in the passports that the puppies are 15 weeks old.
- He can adjust the age of puppies without any problems.
- He charges 180 Litas per puppy [£40] for documents.
- Puppies to arrive in the UK at 12 weeks.
- Talks of recent problems in Siauliai with a vet, so he is now being more careful.



Vet

LITHUANIA VET 2 ... TIME: 14.50 ... DATE: 11/07/2014

Key facts from meeting:

- We purchased two passports for 500 litas [Approx. £120] for puppies that do not exist. We told the vet we have two puppies without papers and need to transport them to the UK on Saturday.
- The vet provided us with two microchips and told us how and where to insert them so they can be easily removed once in the UK. The passports both have all the relevant stamps and stickers for the necessary vaccinations, including the rabies injection.
- He explained that when we remove the microchips we should crush them with a set of pliers. We told him we would destroy the passports once the puppies were in the UK but he said to keep the rabies stickers and to send them back so they could be used again. He has a shortage of the rabies stickers .
- He was happy to issue passports for puppies under 12 weeks old providing they look old enough. He said that the passports will have the rabies stickers but he would not give the puppies the injection because if done whilst the puppy is under three months old it would not be effective. He said we should get this done in the UK when the puppies are old enough.
- Ideally he would like three weeks' notice to do the passports so he can falsify the ages and make it look like the puppies have had the vaccinations and have done the 21 days quarantine before travelling to the UK.

Details of Pet Passports:

Passport numbers: LT 00089800 ~LT 00089801

Microchip Numbers: 900008800698795 ~ 900008800698796

Date of rabies injection: 21-6-14 valid until 21-6-2015.

Tick Treatment date: 11-07-2014

Echinococcus Treatment Date: 11-07-2014

Other vaccinations: Nobivac: 21-06-14 valid until 21-06-2015.



Vet issuing fake passports



Vet issuing microchips for fake dogs

LITHUANIA VET 3 ... TIME: 18.30 ... DATE: 10/07/2014

Key facts from meeting:

- This vet explained that she is happy to issue passports for puppies under 12 weeks old. They can issue us with five passports per week.
- They regularly issue passports for people taking puppies to the UK.
- She said it would be better to have several different vets issuing us with passports so it does not arouse suspicion.
- The cost is 175 litas [approx. £40] per pet passport.



Vet at clinic

MEETINGS WITH TRANSPORTERS/DRIVERS

LITHUANIA TRANSPORTER 1 ... TIME: 22.30 ... DATE: 09/07/2014.....

Key facts from meeting:

- He drives to the UK on Tuesdays and Thursdays. He uses the ferry from Calais to Dover.
- He explains that once the puppies are in the UK he destroys the passports.
- He will not carry any more than five puppies at a time at a cost of £80 per puppy. He puts the names of passengers in the van on the passports.
- He also carries passengers, parcels etc.
- Delivers all over the UK.
- No problems so far with authorities.
- He has a vet contact that he takes puppies to in Kaunas to get passports.



Transporter 1 with his 'post bus' used to transport puppies

LITHUANIA TRANSPORTER 2 ... TIME: 12.20 ... DATE: 10/07/2014.....

Key facts from meeting:

- He makes regular trips to the UK, normally travelling on Fridays via Eurotunnel.
- He carries a maximum of five puppies at a time.
- He charges £70 per puppy for the transportation.
- A vet in Kaunas arranges the papers/passports.



Transporter 2 with his 'post bus' used to transport puppies



CASE STUDY MARKETS

LITHUANIA MARKET 1 ... TIME: 10.55 ... DATE: 13/07/2014

- At the markets there were seven people selling puppies. Mostly these were private dealers that just have one bitch that they breed from and were not doing it for commercial purposes.
- However, we did see a breeder whom we had met previously selling puppies.
- We also met another breeder who was also selling puppies. She said that she sends puppies across Europe and could send puppies to the UK.
- She does not personally get pet passports for Europe but said she can give us the name of a vet that could do the necessary documents for us.
- She explained that the age of puppies can be changed to make them look older on the passports.
- On our covert footage she states that ages of puppies can be changed.



Puppies for sale at market 1

LITHUANIA MARKET 2 ... TIME: 11.30 ... DATE: 06/07/2014

- We went into the market and there were several people selling puppies, most of them were private sellers as opposed to dealers, there was a bitch with a litter of puppies, which were being sold privately, and not on a commercial basis.
- However, we did speak with one man and his wife who had some puppies for sale who said they have other bitches at home due to give birth in a month. We could buy French Bulldogs from them and the man claims to be able to get the puppies into the UK at nine weeks old.

DOGS TRUST INVESTIGATIONS IN HUNGARY

EXECUTIVE SUMMARY

1. Filmed meetings with eight breeders and dealers. Six of these breeders and dealers had previously sold puppies to the UK.
2. Of the eight breeders – six would sell underage puppies to the UK, ranging from six to twelve weeks old. These breeders/dealers said they could get vets to falsify pet passports.
3. Filmed meetings with two vets who admitted falsifying papers. In addition, one further vet supplied two fake passports (including false birth dates and vaccinations) for puppies which we had purchased. The vet did this without seeing the puppies in question.
4. Filmed meeting with one transporter of puppies to the UK, who claimed he complied with all legislation – but mentioned he knew of at least two transport companies who act illegally.

SELECTED CASE STUDIES WITH BREEDERS, DEALERS AND VETS

MEETINGS WITH BREEDERS / DEALERS

HUNGARY SUBJECT 1 ... TIME: 12.00 ... DATE: 20/08/2014

Key facts from meeting:

- She is a dealer and breeder of puppies and claims to have been in the business since 1995. She said she can get puppies into the UK at nine weeks old and has a vet that will adjust the puppies' ages from nine weeks to 15 or 16 weeks.
- She can currently supply puppies with Hungarian, German and Dutch passports and is currently trying to obtain UK passports.
- She has been supplying puppies to the UK for the last three years. She transports puppies via Eurotunnel to the UK three times a week using three different transport companies. Two travel on Saturdays and one travels on Mondays. There are six to eight puppies per transport, with a minimum of four on board.
- She has several drivers so as not to be recognised by customs staff. She drives herself once a month.
- It costs 26,000 HUH per passport [£66 approx] with an extra 10,000 HUH for an Irish passport [£25].
- Puppies under 12 weeks are given a mini rabies vaccination, which is ineffective. She advises the client to get a rabies vaccination in the UK.



Breeder's Puppies



Breeder showing passports

HUNGARY SUBJECT 2 ... TIME: 20.30 ... DATE: 20/08/2014

- A breeder of Chihuahuas and dealer of other small dogs. The business is family run, they breed top quality Chihuahuas and deal in other puppies, which they buy from a breeder and then sell on. They have their own website.
- She sells puppies to the UK and can supply as many puppies as required.
- She can and will supply puppies to the UK at 12 weeks old.
- She states getting the passports will not be a problem.

HUNGARY SUBJECT 3 ... TIME: 21.55 ... DATE: 21/08/2014

- A breeder of Yorkshire Terriers can supply us with puppies at a minimum age of 12 weeks. She has a vet she has used for the last 20 years.
- She supplies puppies at 12 -13 weeks.
- The vet would need the information on the puppies in advance to be able to adjust the ages on the passports.
- She already supplies to private clients in the UK.

HUNGARY SUBJECT 4 ... TIME: 19.00 ... DATE: 21/08/2014

- The company ships puppies worldwide, with customers from the USA and UK, as well as the rest of Europe and the Middle East. They have been in business for several years and claim to sell only top quality puppies. ,
- They can supply us with puppies under the age of 15 weeks and can arrange passports saying that the puppies are older than they really are.
- They claim there are 5,000 breeders in Hungary, of which they deal with a few hundred.
- Once an order is placed the documents can be ready in a day.



Meeting with dealer

HUNGARY SUBJECT 5 ... TIME: 18.00 ... DATE: 22/08/2014

- She has 20 breeding bitches and can supply us with puppies at 12 weeks old with the necessary vaccinations and passports.
- The kennels were dirty and smelly.
- She can supply us with puppies today and get passports by noon tomorrow as it would only take half an hour to get the passports.
- She explained that if we want to buy puppies in the future she can send email photos of the puppies at eight weeks old and we can reserve them. At 12 weeks she can have them shipped to us. The vet will adjust the dates on the passports to make them look the right age.



Breeder at puppy farm



Puppy farm



MEETINGS WITH VETS

HUNGARY VET 1 ... TIME: 15.00 ... DATE: 22/08/2014

- She has said that she can supply passports for puppies under 15 weeks old. She can also recommend drivers and has connections with dealers.
- Supply passports for puppies under 15 weeks for transport to the UK
- Rabies vaccination, microchipping etc. all done on the same day.
- Passports issued on day of departure from Hungary.
- Costs are 13,600 HUH [£35] per passport but this can be cheaper if doing regular business.



Vet at clinic

HUNGARY VET 2 ... TIME: 16.45 ... DATE: 22/08/2014

- He has said he can issue us with passports for puppies under 15 weeks old providing they look to be old enough. He already has dealers he issues passports for that are selling to the UK.
- He charges 12,500 HUH [£32] for a passport and vaccinations. He says he can do passports for puppies at 11 weeks but we are to give him advance notice of this so he can put the details in the database.



Vet at clinic

INVESTIGATIONS INTO SELLERS IN GREAT BRITAIN

Using the same investigation cover story employed in Lithuania and Hungary, Topdogsonline – a company selling puppies in Great Britain – we approached a Lithuanian dealer based in Great Britain who was advertising puppies in Great Britain. We contacted him to arrange a meeting to see if he could supply puppies from Lithuania to us in Great Britain.

GB SELLER 1 ... TIME: 12.00 ... DATE: 08/07/2014

Key facts from meeting:

- They have been importing puppies into Great Britain from Lithuania for around one and a half years.
- They advertise puppies on internet sites such as Pets 4 Homes, Gumtree and their own Facebook site.
- Their clients are mainly from the UK.
- He drives over usually once a week and brings over two to three puppies at a time.
- He brings animals over on a Saturday or over the weekend.
- He has his own breeding facilities but can source other puppies if required.
- He sells dogs at eight weeks old – to be exported to Great Britain. He stated that people in Lithuania do not like to keep dogs longer than eight weeks as they cost money to feed and house.
- Usual selling price is £600/650/700 though he can sell for us for £550.
- He admitted – "a little bit cheat" – on the age of the puppies. They do not have their real age on passports – for puppies that are eight to ten weeks old it is written in their passport that they are four months.
- He showed two Pugs for sale that were nine weeks old. Adverts for these two dogs were later found on Gumtree.



Dealer with one of two Pugs for sale



Two 10 weeks old Pugs that were for sale



Same Pugs for sale advertised on Gumtree website

We decided to follow up with this dealer six weeks later to prove that he was not just advertising puppies on the websites, but actually selling them. We arranged a meeting at his house to buy two puppies recently transported into Great Britain.

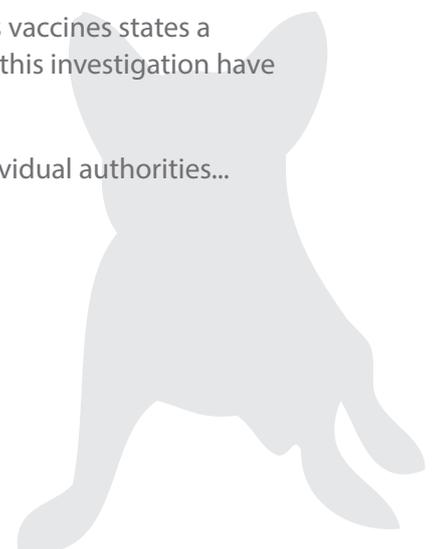
GB SELLER 1 ... SECOND MEETING

Key facts from meeting:

- He had four French Bulldogs and one Toy Terrier for sale at his house.
- Two out of three of the French Bulldogs had arrived the day prior to our visit.
- When asked initially about the age of the puppy that we wanted to buy, he stated that they were four months, as per the details on the passport. The passports also mentioned that all dogs had had their necessary inoculations.
- When asked again if the details on the passport were accurate, he admitted that they were not and indeed the puppies were younger than 15 weeks and had not had their rabies jabs. He advised us to go to a vet and get this done. However, he did mention that we should not take the pet passports with us to the vet to avoid complications.
- After purchasing the puppy from the dealer we then informed Trading Standards of the dealer. The puppy that we purchased was taken to the Animal Reception Centre in Heathrow Airport due to our suspicion that it was 'illegally landed'. The quarantine vet team at the centre confirmed that the puppy was 10 weeks old based upon dentition and weight, so clearly the information on the passports were false. Blood tests taken from the puppy indicated it had no protection from rabies; either it had not been vaccinated or it had not responded to a vaccine.
- Trading Standards also then confiscated further puppies from the dealer's home address.

END NOTES

1. Throughout the report we use the terms smuggling or trafficking of puppies, both are applicable:
 - Smuggling is the illegal entry and international movement either secretly or by deception [whether for profit or not] of puppies.
 - Trafficking involves the transportation of puppies in Great Britain in order to exploit them for profit. The puppies will often suffer from welfare abuses during their transport.
2. Defra: is the Department for Environment Food & Rural Affairs.
3. APHA: the Animal and Plant Health Agency, an executive agency sponsored by Defra.
4. Percentage increase figures obtained from a Defra response to PQ 1934 13/14 about the number of dogs entering Great Britain under the EU pet travel scheme (998/2003) on approved carriers between 2000 and 2013. This data was retrieved from the Pets Database on the 4th February 2014.
5. By entering the UK illegally we mean puppies which are brought into the country through non-compliance with PETS.
6. Maggie Fisher; Update on *Echinococcus multilocularis*: with particular emphasis on its impact on humans 'Companion Animal' May 2014, Volume 19 No 5).
7. Personal correspondence with the Belgian Federal Service of Public Health.
8. By false paperwork we mean Pet Passports which have been fraudulently completed with incorrect or fictitious details in order to comply with PETS.
9. An APHA officer will only attend if it is a welfare matter and Trading Standards will not attend out of normal working hours.
10. This is on the assumption that the marketing organisation of most rabies vaccines states a minimum age of vaccination of 12 weeks. The vaccines that were part of this investigation have been checked to confirm this was the case.
11. Trading Standards figures relate to the number of puppies seized by individual authorities...



APPENDICES

Dogs Trust worked with the agency Tracks with support from animal welfare colleagues in Eastern Europe and contacts at the UK borders to conduct this investigation.

Dogs Trust is the UK's largest dog welfare charity caring for over 17,000 dogs at its network of 20 rehoming centres throughout the UK. We will never put to sleep a healthy dog. 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 is an ethical investigation agency supporting the work of conservation and animal protection NGO's and charities worldwide.

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For further information please contact: Paula Boyden, Dogs Trust Veterinary Director
paula.boyden@dogstrust.org.uk

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WEASELDANCE
design & illustration

weaseldancedesign.com



For more info, please contact

Paula Boyden, Dogs Trust Veterinary Director
paula.boyden@dogstrust.org.uk

Head office:
17 Wakley Street
London
EC1V 7RQ

020 7837 0006
www.dogstrust.org.uk
info@dogstrust.org.uk

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