Dogs Trust has long highlighted the failures of the Pet Travel Scheme (PETS). Our investigative work in this field has found evidence of:

- Breeders and dealers in Central and Eastern Europe using the Pet Travel Scheme for the illegal importation of underage puppies into Great Britain;
- Unscrupulous vets falsifying data on pet passports;
- Vets in Serbia (an unlisted third county) providing pre-filled Hungarian and Bulgarian passports and microchips for underage puppies, passing them off as EU-bred animals;
- Vets in Lithuania offering to sedate puppies to smuggle them through the border;
- Heavily pregnant females being illegally brought into the UK to allow dealers to dupe buyers into buying 'UK bred' puppies;
- Ineffective border controls and enforcement of PETS at UK ports;
- Lack of sufficient penalties to deter the illegal trade;
- Puppies as young as 4 weeks entering the UK when the legal minimum age to travel via PETS is 15 weeks.

In December 2015, we launched our pilot quarantine initiative, which aims to disrupt the trade by providing care and support for illegally imported puppies. Until Dogs Trust stepped in, illegally imported puppies were at risk of being turned away at the borders only to enter the country at another time instead, or being put to sleep. Puppies seized under the initiative are quarantined, socialised and habituated, and then rehomed responsibly through our network of rehoming centres.

Since December 2015 around 1000 puppies have been rehomed by Dogs Trust after going through quarantine. The majority of puppies seized (95%) were deemed to be underage. Sadly, more than 4% of the puppies died before we were able to rehome them due to poor health, malnutrition and dehydration.

In 2016 Defra, the Welsh Government and the Scottish Government consulted on the Non-Commercial Movement of Pet Animals Order 2011, which implements EU legislation on pet travel into domestic legislation. However, the governments have not put forward any clear proposals to tackle the abuse of this legislation.
As pet travel is governed by EU legislation, when the UK leaves the EU there will be an opportunity to review this legislation. We strongly believe that the legal requirements and implementation of current EU legislation in the UK should be reviewed and amended. These amendments should include:

- Reintroduction of the requirement for a rabies blood (titre) test before entry into the UK, together with a wait period, in line with the incubation period of rabies;
- The window for tapeworm treatment of dogs before entry into Great Britain to be shortened from 24-120 hours to 24-48 hours and tapeworm treatment for cats should be reintroduced. The current period within which treatment must be administered before travel is too long and therefore the risk of reinfection after treatment and before travelling is higher;
- Reintroduction of the requirement for dogs and cats to be treated against ticks;
- Reduce the number of dogs allowed under non-commercial movement rules (currently 5 dogs for each person travelling).
- Increase maximum penalties for those caught illegally importing dogs, together with the introduction of punitive Fixed Penalty Notices

As part of the Defra, Welsh Government and Scottish Government's review of the Pet Travel Scheme we call for an immediate action plan to address the abuse of PETS and the number of undeclared dogs entering Great Britain every day. This should include a shift of enforcement responsibilities from carriers to government agencies.

The UK’s pet travel rules are regulated by EU legislation, we also call for the pet travel legislation to be amended with urgency once the UK exits the EU. This should include the reintroduction of rabies blood (titre) test, together with an appropriate wait period, before pets can enter into the UK.
In October 2018 the Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018 came into effect, introducing a single animal establishment licence for dog breeding and selling.

Dogs Trust welcomed the move to update what was outdated legislation. However, we are concerned that the Regulations do not go far enough to sufficiently protect dog welfare.

An improved, robust licensing system is required to tackle unscrupulous breeders and sellers. Whilst the regulations reduced the threshold for licensing of dog breeders from five to three or more litters in a year, we believe only a system that has total traceability can be fully effective.

We believe that anyone breeding, selling or transferring the ownership of a puppy (a dog up to 6 months old), regardless of any financial transaction or gain, should be required to at least be registered. In addition to this, anyone breeding, selling or transferring the ownership, regardless of any financial transaction or gain, of more than one litter of puppies should require a licence. It should then be a mandatory requirement for any advert to include the registration or licence number.

In May 2019 the Government laid an amendment to the Animal Welfare (Licensing of Activities Involving Animals) Regulations 2018 to introduce a ban on the third party selling of puppies and kittens.

The welfare of our nation’s dogs is our highest priority. Dogs Trust wants to see an end to third party sales including the sale of puppies in pet shops. As this is a complex issue, we believe an end to third party sales can best be achieved by introducing a ban as part of a comprehensive package of coordinated measures, so we can be confident that it will have the success we all want to see.

These include:

- Rehoming organisations and sanctuaries to be regulated through licensing and inspection. Currently anyone can set themselves up as one which leaves a gaping loophole for immoral breeders and sellers to continue their trade, even with a ban;
- Full traceability and transparency by registering anyone who is selling a litter, along with licensing and inspection for those producing more than one litter;
- Vital training and support for local authority inspectors to enforce the right breeding standards;
- Urgent changes to the Pet Travel Scheme to stem the flow of illegally imported puppies into Great Britain along with harsher penalties given to these unscrupulous breeders and traders who wouldn’t be deterred by a ban on third party sales.
The licensing and inspection of anyone breeding or selling puppies must be robust and consistent and carried out by someone fully trained in animal welfare. Before this can happen, inspectors must have the full support of both the Government and their local authority to enforce the right standards. Dogs Trust recommends the Government develop a central unit of appropriately trained inspectors which can be utilised by Local Authorities to carry out inspections of animal establishments.

**Advertising**

Dogs Trust chairs the Pet Advertising Advisory Group (PAAG) which was created in 2001 to combat growing concerns regarding the irresponsible advertising of pets for sale, rehoming, and exchange. Since its formation PAAG has witnessed a significant increase in the number of pets and animals sold via online adverts.

PAAG’s work has been endorsed by Defra, the Welsh Government, DAERA in Northern Ireland and the Scottish Government.

PAAG has created a set of Minimum Standards for the advertising of pets on online classified advertising websites, which are voluntarily being applied by six websites in the UK. Unfortunately, whilst the standards are voluntary there is a limit to their effectiveness as not all websites are willing to adopt them. We are pleased Defra has made it a legal requirement for licensed sellers in England to display their licence number on all adverts, which came into force in October 2018, along with other PAAG Minimum Standards becoming a legal requirement for licensed sellers.

*We urge the Defra to make PAAG’s Minimum Standards mandatory requirements. We also call on the Government to introduce a centralised, publicly accessible list of registered and licensed breeders and sellers to enable websites and buyers to check the legitimacy of advertisers. Registration would mean that every advertisement would have a registration or licence number displayed, creating a simplified system that would be easily accessible for purchasers to verify who they are buying a dog from in an increasingly online, nationwide marketplace.*
Dogs Trust has long been calling for regulation of rehoming organisations and animal sanctuaries.

- Currently there is no legislation in place, so anyone can set up their own rehoming organisation or sanctuary.

- There is little to proactively safeguard the animals involved as the Local Authority does not inspect these premises as they are not required to do so.

- Poor welfare can lead to health problems as well as behavioural issues which can be challenging when the animal is rehomed.

We would like to see all such establishments licensed, with regular inspections against mandatory minimum standards to ensure the welfare requirements of the animals are met. We believe licence fees should be proportionate to the size of the rehoming centre or sanctuary.

As with any welfare organisation, if introduced, Dogs Trust would also be subject to such regulation. We see this as a positive move to improve overall standards across rehoming organisations and animal sanctuaries.

In 2017 the Scottish Government announced its intention to introduce a system of registration and licensing for animal sanctuaries and rehoming centres. In a Westminster Hall debate on 26th February 2019, the Minister for Animal Welfare confirmed that Defra is also looking at the options for licensing rehoming centres.

We urge the Government to introduce statutory regulation of rehoming organisations and animal sanctuaries to improve dog welfare standards.
In 2010, Wales led the way by banning the use of electronic shock collars. The Scottish Government has introduced guidance on the use of electronic shock, sonic and spray collars in Scotland.

Only Westminster can ban the sale of these devices across the UK.

In August 2018 Defra announced plans to ban the use of electric shock and spray collars which are triggered by a hand-held remote control. The Government plans to do this by introducing regulations under the Animal Welfare Act 2006 which make it an offence to put these devices on a cat or dog.

Whilst we welcome this positive step towards improving dog welfare, we want the Government to go further and ban the sale and distribution of these devices, and to extend the ban to cover sonic collars as well as devices activated automatically through vibrations caused by barking.

Dogs Trust believes that the use of these devices is detrimental to the welfare of dogs. Research has shown that:

- There are consistent links between positive punishment or negative reinforcement methods and problematic behaviours such as aggression, high arousal and poor learning ability;
- Aversive training devices do not deal with the root cause of barking or other undesirable behaviours;
- Shocks from e-collars during training cause distress-related behavioural reactions and are physically stressful for dogs;

Under no circumstances do we condone the use of equipment or techniques that use pain or fear to train a dog. Dogs Trust cares for around 15,000 dogs a year using reward-based training methods only.

**Dogs Trust calls on the Government to implement a ban on all aversive training devices.**

**For a ban on the use of these devices to be fully effective the Government must go further and ban their sale across the UK.**
Greyhounds

The Welfare of Racing Greyhound Regulations 2010 were introduced after huge pressure from charities, MPs, media and the public to ensure that the welfare of the dogs was better protected. However, the legislation only focused on welfare measures at the track, failing to provide any legislative protection for greyhounds during breeding, kenneling (where greyhounds spend more than 90% of their time), transportation, and retirement.

In 2015 Defra research into the effectiveness of the Regulations identified concerns with the current legislation. However, having completed a Post Implementation Review of the 2010 Regulations, the Government has yet to make amendments to the legislation. We are concerned that the Regulations still fail to address key greyhound welfare concerns, as well as recommendations made in the EFRA Committee's June 2016 report on greyhound welfare.

Dogs Trust, along with the EFRA committee, is calling for the Regulations to be extended to cover trainers’ kennels, where greyhounds spend the majority of their time, and amended to require the publication of welfare data relating to injury, euthanasia and rehoming. Each year around 6700 Greyhounds are retired from GBGB tracks and an unknown number from independent tracks. The Greyhound Trust rehomes around 4000 Greyhounds. Dogs Trust rehomes over 300 Greyhounds a year. Of the 2400 unaccounted for from GBGB tracks, some will be rehomed via welfare organisations, however not all of these dogs can be accounted for via welfare organisations and this figure does not include dogs retired from independent tracks.

In light of the significant turnover the sport generates, we also believe the onus should be put on bookmakers who profit from greyhound racing to contribute financially to improving welfare standards. We call for a commitment from the Government on what further action it will take if sufficient welfare contributions aren’t voluntarily made by the industry.

We call on the Government to implement the recommendations in the EFRA Committee’s June 2016 report, to make much needed changes to the 2010 Regulations to ensure they better protect all racing greyhounds throughout their racing careers.
Animal cruelty Sentencing

The woefully inadequate penalties available for cruelty cases following conviction under the Animal Welfare Act 2006 (AWA) are a serious cause for concern. Whilst the owner of a dog which injures or kills an assistance dog can (quite rightly) be given a maximum custodial sentence of three years, a person who injures or kills any dog can only receive a maximum custodial sentence of six months.

This discrepancy highlights the urgent need for a review of animal cruelty sentences under the AWA and the introduction of penalties that reflect the seriousness of the offences that are sadly carried out on a daily basis.

Whilst the AWA was intended to strengthen animal cruelty sentencing with up to 51 weeks imprisonment, the legislation that would commence these terms has not been implemented; therefore the maximum custodial sentence remains as it was under the Protection of Animals Act 1911, just six months. As a result the effectiveness of the AWA is severely blunted by the weakness of the sentences available to the judiciary.

The maximum penalty for animal cruelty offences in Northern Ireland is five years imprisonment and/or an unlimited fine. The Scottish Government has committed to increasing the penalties in line with Northern Ireland.

The Animal Welfare (Sentencing) Bill (2017-19), which contains the necessary provisions to increase the maximum penalty for animal cruelty from six months’ imprisonment to five years’ imprisonment in England and Wales, is currently making its way through Parliament. We welcome this Bill and hope to see it pass without delay.

Dogs Trust also has concerns about the welfare of dogs, seized as part of cruelty cases, that may spend protracted periods of time in kennels whilst these cases go through court. This is often detrimental to the welfare of the animals involved, as many dogs find kennelling difficult to cope with. Alongside increased sentences for animal cruelty, Dogs Trust would like to see a requirement for courts to automatically consider whether it is in the interests of the present or future welfare of an animal taken into possession as part of an animal cruelty case, to make an order requiring that the animal be sold or rehomed.

We strongly urge the Government to increase the maximum penalty available to the courts to 5 years without further delay to bring the sentences in line with those in Northern Ireland.
Fireworks

Easy access to fireworks and poor enforcement of existing legislation is having a detrimental impact on dog welfare.

- Dogs feel safe and secure when they can predict and control their environment, so when unexplained noises happen unexpectedly such as those caused by fireworks, this can be extremely stressful for dogs.
- In these cases we may see behaviours such as avoidance (e.g. hiding away, not eating and agitation) and overt behaviours (e.g. barking, spinning, tail-chewing) that occur as dogs try to drive away the perceived threat.
- These behaviours can be extremely challenging for owners to address because fireworks remain out of their control so they are unable to remove the triggers for their dog’s fearful behaviour.

We want to see further restrictions around the sale of fireworks, limiting them to licensed, public occasions and organised events.

We also recommend that local authorities should take the location of public displays into consideration when granting a licence and require that they are well publicised in the surrounding area.

In February 2019 the Scottish Government launched a consultation on introducing further controls on the use of fireworks in Scotland. However, only Westminster can ban the sale of fireworks to the public.

We strongly urge the Government to introduce regulations to ban the sale of fireworks to the public and restrict their use to licensed, public occasions and organised events only.
Breed-specific legislation

There is a vital need to overhaul the existing Dangerous Dogs legislation. One of the biggest failures of the Dangerous Dogs Act (DDA) is the emphasis on breed specific legislation, which evidence suggests is not effective in reducing the number of dog bites.

The available evidence tells us that:

- All dogs have the capability to become aggressive. Breed specific legislation is therefore flawed in the assumption that the breeds and types of dogs that are banned are more ‘dangerous’ than other breeds;
- Inappropriate human-dog interaction is almost always involved prior to attack. Education on dog behaviour and how to appropriately interact with dogs is therefore crucial to the prevention of dog bites and attacks.

The scientific evidence available is further detailed in Dogs Trust’s response to the Environment, Food & Rural Affairs Committee’s inquiry 2018 inquiry into Dangerous Dogs & Breed Specific Legislation, which Dog Trust can provide on request.

Dogs Trust has serious concerns about:

- How subjective the interpretation of the standard for identifying Pit Bull Terrier types can be, and how a dog can be deemed ‘dangerous’ based on conformation alone;
- The impact of the current legislation on dog welfare. This includes concerns about the protracted periods dogs can spend in kennels during the court process, the conditions for the keeping of exempted dogs and the number of prohibited dogs that are euthanised because they cannot be rehomed.

Dogs Trust strongly believes in ‘deed not breed’ and therefore breed specific legislation should be repealed. If there is absolutely no possibility of this, then it is imperative that the government introduces measures to protect the welfare of the prohibited dogs involved. This should include allowing the safe rehoming of exempted prohibited types of dogs and reviewing the rules around keepership.

In order to effectively tackle dog bites and dog attacks, action is needed to ensure responsible dog ownership, traceability and accountability of dog owners and the identification and prevention of early signs of aggression.

Better sharing of intelligence and joint working between local authorities and the Police is needed in order to prevent dog bite incidents.

Dogs Trust urges the government to repeal breed specific legislation.
Dogs Trust strongly believes there is the need to recognise animal sentience in domestic law via primary legislation once the UK leaves the EU. Currently, the UK has no legal instrument which achieves this other than Article 13 of the Treaty on the Functioning of the EU and so it is crucial to ensure that this principle is retained in future UK legislation after EU exit.

We feel the recognition of sentience in domestic law will provide an opportunity to move the principles of the Animal Welfare Act 2006 forward. At present the welfare needs of animals, whilst critical to ensuring the welfare of animals, promote an approach of ‘a life worth living’. We believe enshrining sentience in domestic law will enable us to move towards the promotion of positive welfare for animals, i.e. a good life.

We are pleased that Defra has committed to enshrining animal sentience in domestic law when we leave the EU, and believe it’s now important to ensure that any measures to introduce this are robust and enforceable so that any future legislation or Government policy fully takes into account the impact on animal welfare.

We urge the Government to enshrine animal sentience in domestic law when the UK exits the EU.
Dogs Trust long campaigned for the introduction of compulsory microchipping for all dogs, and previously chaired the Microchipping Alliance. We have offered free microchipping by appointment at all our rehoming centres for many years and have chipped over 1.1 million dogs since launching our campaign in 1999.

We greatly welcomed the Microchipping of Dogs Regulations 2015 and likewise are pleased the Government is currently carrying out a review of these regulations.

However, there are certain areas that Dogs Trust would like the Government to address in the review:

**It is essential that all puppies can be linked back to their breeder for full traceability purposes. Therefore, Dogs Trust would like to see enforcement of the obligation for the breeder to always be recorded as the dog’s first keeper.**

We have long stressed the fact that a microchip on its own is meaningless. Every year, thousands of stray dogs are unable to be reunited with their owners because their tag and chip details are not up to date.

**We would ask the Government to help increase awareness of how vital it is that owners keep their details up to date on the relevant database.**

Dogs Trust is very much aware that local authorities across the country are under enormous pressure in the current financial climate, and some struggle to find the adequate resources to implement and enforce new legislation.

**We would like to see a commitment from the Government to offer not just clear guidance, but financial support to local authorities for the effective enforcement of these regulations in order to reduce variation across different local authorities in both enforcement and levels of fines imposed.**