A Review of DOGS TRUST'S Comments on DEFRA's Response to the Animal Establishment Licensing Review and EFRA Committee Animal Welfare Inquiry Recommendations
On 20th December 2015, DEFRA launched a consultation on the review of animal establishments licensing in England. DEFRA stated that as part of its commitment to better regulation it was conducting a cross-cutting review of licences and permits. The consultation ran for 12 weeks ending on 12th March 2016, and a summary of the responses was published on 15th September 2016.

On 4th February 2016, the Environment, Food and Rural Affairs Sub-Committee (EFRA) held a series of short inquiries on animal welfare over the course of Parliament. The inquiry focused on domestic pets, including cats, dogs and horses. The inquiry would examine the effectiveness of the Animal Welfare Act and its enforcement with regards to domestic animals. The inquiry would also examine whether that Act and other existing legislation remains fit for purpose in the age of the internet with regards to the sale of domestic pets.

On 2nd November 2016, the Environment, Food and Rural Affairs Sub-Committee (EFRA) released their report into Animal welfare in England: domestic pets following the submittal of oral and written during their inquiry. The report contained a summary of the inquiry, conclusions and recommendations as well as Sub-Committee formal minutes and Committee formal minutes. Among the many recommendations was a ban on the third party sales of dogs.

On 1st February 2017, the Environment, Food and Rural Affairs Sub-Committee (EFRA) published the Government's Response to the EFRA Committee's Third Report which included a summary of their inquiry into Animal Welfare: Domestic Pets, its conclusions and recommendations.

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On 6th February 2017, Dogs Trust released a comment on animal establishments licensing. Dogs Trust commenced their ‘comment’ with the following statement:

"Dogs Trust has been campaigning for many years for the legislation surrounding dog breeding, pet selling and animal boarding establishments to be updated and strengthened. The current legislation is outdated and measures are urgently needed to bring the number of establishments operating without a licence under control."

DOGS TRUST COMMENT: Although Dogs Trust would want to see a world where third-party sales are not happening, the charity does not believe that it is in the best interests of animal welfare to rush into a ban that would have unintended consequences for dog welfare at the current time.

QUESTION 1: Has Dogs Trust explored ways to stop third party sales from happening?

QUESTION 2: Does Dogs Trust now consider that it ‘rushed into’ its 2010 campaign to ban the sale of puppies from pet shops?

DOGS TRUST COMMENT: Therefore, a better route is a robust regime of licensing and inspection for breeders backed with increased enforcement of the law. If puppy breeding and selling are driven underground, enforcement will only become harder.

QUESTION 3: Can Dogs Trust provide any evidence to demonstrate that a “robust regime of licensing and inspection for breeders backed with increased enforcement of the law” can significantly improve welfare in commercial dog breeding establishments?

QUESTION 4: What evidence does Dogs Trust have to support its claim that “a robust regime of licensing and inspection for breeders backed with increased enforcement of the law” will protect the welfare of puppies sold through third party outlets such as pet shops?

QUESTION 5: Can Dogs Trust explain its definition of ‘underground’?

QUESTION 6: What evidence does Dogs Trust have that a ban on commercial third party puppy selling would drive the trade underground and that it could survive undetected ‘underground’?

QUESTION 7: Why does Dogs Trust believe that a ban on third party sales would result in commercial breeders going ‘underground’?

QUESTION 8: Why does Dogs Trust believe it is possible to increase enforcement of a robust regime of licensing and inspection but not a ban on commercial third party puppy sales?

QUESTION 9: Can Dogs Trust provide evidence to support its claim that enforcement will be easier if puppy traders are licensed and inspected?

DOGS TRUST COMMENT: The simple fact is that there are too few puppies to meet demand in the UK.

On 5th January 2017 (The 100 Homeless Puppies of Christmas) Dogs Trust reported:

- Each year we take in more and more unwanted dogs
- A massive 54% increase in dogs handed over in the period 20th December - 2nd January compared with the same time last year.
- 127 unwanted dogs handed in during this two week period alone.
- Over a third of these handovers were puppies
- A thousand calls from people looking to give up their dog in the two weeks after Christmas.

**QUESTION 10:** How can Dogs Trust claim there are too few puppies to meet demand when it has revealed a “massive 54% increase in dogs handed over” to its rehoming centres over Christmas and that “over a third of these handovers were puppies?”

**DOGS TRUST COMMENT:** As long as the supply of puppies from responsible breeders falls woefully short of meeting the demand, unscrupulous breeders will breed dogs for profit even if they have to circumvent or flout the law.

**QUESTION 11:** What evidence does Dogs Trust have to support the claim that responsible breeders are unable to supply enough puppies to ‘meet demand’?

**QUESTION 12:** What are Dogs Trust’s proposals for increasing the ‘woefully short supply’ of puppies from responsible breeders?

**QUESTION 13:** Does Dogs Trust believe that some puppy purchasers will have to buy from unscrupulous breeders because the supply of puppies from responsible breeders falls woefully short of meeting the demand?

**QUESTION 14:** Does Dogs Trust feel it is appropriate that ‘unscrupulous breeders’ should legally be able to breed and sell puppies to meet the alleged shortfall in supply of puppies from responsible breeders?

>“Many dogs are bred for a quick profit by what is often referred to as a ‘puppy farm’, they are raised without care or love and sold to unsuitable households. These dogs will often end up being abandoned and destroyed each year - due to illness, behavioural issues or simply because they are not just the right type of dog for their new family. At Dogs Trust we strongly advise you to choose your breeders carefully - make sure the dogs are kept in clean conditions and that you can see the puppies’ parents - and avoid buying your puppy from pet shops. Be prepared to put your name on a waiting list for a litter to be born. A WELL BRED PUPPY IS WORTH WAITING FOR.”

>“This is why it is so important for you to go to a reputable breeder when choosing a puppy.”

**DOGS TRUST COMMENT:** As long as the supply of puppies from responsible breeders falls woefully short of meeting the demand, unscrupulous breeders will breed dogs for profit even if they have to circumvent or flout the law.

**QUESTION 15:** Why doesn’t Dogs Trust regard eliminating the only outlet for commercially imported puppies to be the answer to the illegal puppy trade?

In its Puppy Farm Briefing 2017, Dogs Trust state “The commercial movement of pets is welcomed under the Balai Directive 92/65/EEC.” It explains that that the scheme is “underpinned by additional safeguards in respect of welfare and traceability”.

**QUESTION 16:** Does Dogs Trust welcome the commercial movement of pets under the Balai Directive as a solution to meeting the demand for puppies in the UK?

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Dogs Trust stated “the most radical solution to the illegal puppy trade would be an enforced ban on any puppy under six months old from entering Great Britain under the pet travel scheme.”

**QUESTION 17:** Why does Dogs Trust believe an ‘enforced ban on any puppy under six months old from entering Great Britain’ is possible if it believes enforcing a ban on third party selling would drive sellers underground?

**DOGS TRUST COMMENT:** A ban on third party sales would encourage more such criminal activity as commercial breeders and sellers go underground.

**QUESTION 18:** Is it Dogs Trust intention to legitimise or eliminate the commercial puppy trade between Eastern Europe and the UK?

**DOGS TRUST COMMENT:** Welcomes the Government’s review of animal establishments licensing in England and the range of measures it sets out.

**QUESTION 19:** Does Dogs Trust believe that it is impossible to detect and take enforcement action against ‘criminal activity’?

Dogs Trust welcomes the Government’s review of animal establishments licensing in England and the range of measures it sets out.

**QUESTION 20:** Does Dogs Trust consider that DEFRA’s measures will increase the supply of puppies from responsible breeders?

**DOGS TRUST COMMENT:** We are particularly pleased that it will be illegal to sell a puppy below the age of eight weeks.

**QUESTION 21:** Does Dogs Trust feel that a ban on the sale of puppies below the age of eight weeks is enforceable?

**DOGS TRUST COMMENT:** and that there will be tighter licensing rules which will require licensed sellers to display their licence number when advertising, including online.

This will provide further transparency and as this will apply to pets advertised online, this is an important step forward in protecting the welfare of the many thousands of animals that are advertised for sale on classified websites every day.

**QUESTION 22:** Why doesn’t Dogs Trust consider that the requirement to display a license number when advertising will prevent puppy sellers from being able to operate ‘underground’?

**DOGS TRUST COMMENT:** The charity believes that inspection and regulation are key to improving the lives of dogs.

**QUESTION 23:** Can Dogs Trust provide specific examples where inspection and regulation has successfully improved the lives of dogs in commercial dog breeding establishments that supply puppies to third parties such as pet shops?

**QUESTION 24:** Can Dogs Trust explain how inspection and regulation will protect the welfare of puppies sold through commercial third party outlets?

**DOGS TRUST COMMENT:** The charity will continue to work with the government to ensure the final regulations are fit for purpose and in line with the current knowledge of dog health and welfare. It is vital that the new legislation requires anyone breeding and selling puppies to have structured socialisation and habituation plans in place, as is already the case in Wales and Northern Ireland.

**QUESTION 25:** How would Dogs Trust define regulations that are fit for purpose?

**QUESTION 26:** Can Dogs Trust demonstrate that structured plans for socialisation and habituation are being implemented by breeders in Wales and Northern Ireland?

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**QUESTION 27**: Does Dogs Trust have examples of enforcement action against breeders and sellers that fail to sufficiently socialise and habituate puppies?

**A DOG IS FOR LIFE?**

Dogs Trust have repeatedly referred to a lack of puppies to meet demand, citing this as a reason why a ban on the third party sale of puppies would drive the trade underground. The following statements have been made by Dogs Trust over the last two months:

**1st December 2016**: ¹⁰ *Tis the Season to Give Socks, Not Dogs* - Socks Trust is working to avoid the plight of puppies bought on a whim and neglected when the reality of dog ownership sinks in. Last year, a staggering 3,400 calls were made in the 30 days following Christmas from new owners wanting to give up their dog, amounting to a staggering 113 calls about unwanted dogs per day.

**12th December 2016**: ¹¹ *Dogs Trust: A Dog is For Life, Not Just for Christmas* - Unfortunately, the famous Dogs Trust slogan remains as relevant today as it was when it was first coined 38 years ago. Time and again the charity sees a flurry of dogs abandoned over Christmas when the appeal of a cute puppy wears thin.”

**4th January 2017**: ¹² *Dogs Trust West Calder appeal for home for pup 'abandoned' just after Christmas* - The charity’s iconic slogan; 'A dog is for life, not just for Christmas' still isn’t sinking in. “In the days following Christmas we often get more people turning up at the rehoming centre to hand over their unwanted dogs, many of whom are puppies. We just wish more people did research before purchasing or adopting their puppy.”

**5th January 2017**: ¹³ *The 100 Homeless puppies of Christmas* - Dogs Trust is urging the public to consider the commitment of dog ownership before buying a puppy in 2017. It seems that, in this day and age, where puppies are readily available at the click of a button, people are still choosing to purchase a dog on impulse, without thinking about the long-term effect this will have on their life.

**QUESTION 28**: Does Dogs Trust believe that ‘meeting demand’ will mean that puppies are bought for life, not just for Christmas?