

**Q1. In which policy areas, within the remit of the Climate Change, Environment and Rural Affairs Committee, are legislative and non-legislative common frameworks needed?**

1. On 9 March, the UK Government published its provisional assessment of where common UK frameworks might be required after Brexit in areas of EU law within devolved competence<sup>1</sup>. The provisional assessment determined that the following policy areas should be subject to more detailed discussion to explore whether legislative common framework arrangements might be needed, in whole or in part:
  - a. Animal health and traceability - EU rules and standards that aim to maintain animal health and allow their movement, including policies covering: prevention of disease (entering UK), control of disease (endemic and exotic), surveillance (for exotic disease) movement of livestock, pet passports and veterinary medicines.
  - b. Animal welfare – EU rules relating to aspects of animal welfare including on-farm issues, movement of livestock and slaughter
2. Whilst Dogs Trust agrees that these policy areas should be covered by legislative framework agreements, there are some issues within these policy areas that have not been explicitly mentioned in the provisional assessment. This includes:
  - a. The welfare of companion animals during transport
  - b. The sale and import/export of dog fur
3. It is important to ensure that the above issues are also covered by legislative framework agreements.
4. In addition, the UK Government's provisional assessment identifies the following policy area where a non-legislative common framework may be required:
  - a. Sentencing (taking convictions into account) - Framework Decision on taking convictions into account (2008/675) requires the national criminal courts of all

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<sup>1</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/686991/20180307\\_FINAL\\_Frameworks\\_analysis\\_for\\_publication\\_on\\_9\\_March\\_2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/686991/20180307_FINAL_Frameworks_analysis_for_publication_on_9_March_2018.pdf)

Member States to take account of a defendant's known previous convictions in other Member States to the extent previous national convictions are taken into account.

5. Dogs Trust believes that this policy area should be covered by a common framework agreement, and it is important that this includes convictions for animal related offences.

## **Q2. Does the provisional assessment published by the UK Government set out an appropriate approach and is it complete?**

### **1 Animal health and traceability**

1. The provisional assessment published by the UK Government recommends further, detailed discussion on the need for a legislative framework agreement on animal health and traceability. Currently, EU legislation regulates pet travel (Regulation No 576/2013) as well as the commercial movement of pet animals (Directive 92/65/EEC).
2. Dogs Trust strongly suggests that a legislative framework is needed to cover both of these areas post EU-Exit.

#### **1.1 The Pet Travel Scheme**

1. Regulation No 576/2013 sets out the requirements for dogs, cats and ferrets which are moved for non-commercial purposes between EU Member States or into the EU. This is otherwise known as the Pet Travel Scheme (PETS). The PETS rules were changed in 2012 with the aim of harmonising travel across Europe, resulting in a relaxation of the UK's quarantine and animal health controls. Defra figures show that the number of dogs entering Great Britain since these changes continue to increase year on year with 152,075 entering in 2013 and 287,016 entering in 2017.
2. Through three undercover investigative reports<sup>2,3,4</sup> we have documented abuse of the Pet Travel Scheme to illegally import puppies destined for commercial sale. Dogs Trust has found:
  - a. Breeders and dealers in Central and Eastern Europe using the Pet Travel Scheme for the commercial importation of puppies into Great Britain
  - b. Unscrupulous vets falsifying data on pet passports
  - c. Vets in Lithuania offering to sedate puppies to smuggle them through the border
  - d. Ineffective border controls and enforcement of PETS at UK ports
  - e. Negligible sharing of intelligence amongst key agencies

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<sup>2</sup> <https://www.dogstrust.org.uk/puppysmuggling/puppy%20smuggling%20report%202014.pdf>

<sup>3</sup> [https://www.dogstrust.org.uk/puppysmuggling/final%20use%20this%20one%20puppy%20smuggling\\_2.8.pdf](https://www.dogstrust.org.uk/puppysmuggling/final%20use%20this%20one%20puppy%20smuggling_2.8.pdf)

<sup>4</sup> [https://www.dogstrust.org.uk/puppy-smuggling/puppy%20smuggling%20report\\_final%20pdf.pdf](https://www.dogstrust.org.uk/puppy-smuggling/puppy%20smuggling%20report_final%20pdf.pdf)

f. Lack of sufficient penalties to deter the illegal trade

3. It is important that the UK looks to take further measures to protect our biosecurity. For example, whilst the UK currently has a derogation requiring dogs entering the country to be treated against the tapeworm *Echinococcus multilocularis*, this provision needs to be more robust. We also recommend the reintroduction of rabies blood testing, together with a wait period after the rabies blood test, before entry into the UK. Furthermore, there are non-endemic diseases of dogs, such as leishmaniasis (also potentially zoonotic), which are being brought into the UK which are not currently addressed. Whilst most of the non-endemic diseases are not zoonotic, they do have an impact on the UK dog population.
4. We are concerned that the increased number of animals coming into the UK under the Pet Travel Scheme, together with concerns about compliance with and enforcement of the legislation, presents a disease risk that urgently needs to be addressed. However, it is important to ensure consistency across the UK and for this reason we strongly believe that a legislative framework would be the best approach.
5. Since 2015, we have been working with Defra, APHA and Kent Trading Standards on the 'Puppy Pilot' project, which aims to disrupt illegal puppy importations by funding the quarantine, veterinary costs and subsequent care of seized puppies. To date, over 800 puppies have been seized as part of the Puppy Pilot project. Through our work on this project, we are aware of the ever evolving tactics of importers, facilitated via communicating with one another through online chat rooms. Since December 2015 examples of evolving tactics have included:
  - a. The age of pups being imported is increasing to make it harder for those enforcing the Pet Travel Scheme to detect underage puppies. There has been a noticeable movement towards the importation of puppies from less than 10 weeks old to around 12 to 14 weeks of age, just under the legal minimum of 15 weeks.
  - b. There has been a worrying development in the importation of heavily pregnant bitches, so their puppies can be sold at a younger age as 'UK born'. One such example is Lola, a heavily pregnant French Bulldog bitch that was transported from Lithuania. Lola was seized due to welfare concerns as it is illegal to transport a bitch in the last 10% of her gestation period. Lola was discovered in a crate in a vehicle by customs officers at Dover. The temperature in the back of the van was unregulated and it had no ventilation. Lola was taken to a Dogs Trust rehoming centre where she gave birth to four puppies, but sadly two of these were stillborn.
  - c. In our latest undercover Puppy Smuggling investigation we uncovered private vets in Lithuania offering sedatives for importers to administer to puppies before passing through border checks, to truly smuggle them into the country.

6. As we are aware that importers are constantly changing tactics, in order to avoid the seizure of illegally imported puppies by enforcement authorities, we believe a prescriptive legislative framework is necessary to ensure consistency of enforcement across the UK's entry points and to minimise the risk of any loopholes being exploited.

## **1.2 Commercial movement of pet animals**

1. Directive 92/65/EEC (the Balai Directive) sets out the animal health requirements for animals being moved between or into Member States for commercial purposes. When more than five dogs, cats and ferrets are being moved, this Directive also applies regardless of whether the movement is for a commercial purpose (unless the animals are being moved for the purpose of participating in competitions, exhibitions or sporting events). This Directive also applies to the movement of animals for rehoming purposes.
2. In addition to the requirements set out in PETS, this Directive requires that animals must come from a holding or business registered in the EU country of origin. Importers must obtain a health certificate (issued from the European Commission's TRACES website) for each movement of animals. An authorised vet must carry out a clinical examination of each animal ensuring they are fit to travel, within 48 hours before travel.
3. Through our work on the Puppy Pilot project, we have experienced cases of puppies seized under the Balai Directive, where puppies have been imported into Great Britain in poor conditions and without complying with the animal health and traceability requirements of the legislation.
4. We also have concerns about the practice of importing adult dogs into the UK for rehoming, and the non-endemic diseases they may be carrying, such as Babesiosis and Ehrlichiosis. The UK has a naïve dog population regarding these diseases and we are therefore concerned that this presents a significant disease risk.
5. As for the Pet Travel Scheme, the decision for the UK to exit the EU provides a good opportunity to review and amend this legislation, which we believe is urgently needed. Similarly to PETS, it is important to ensure there is consistency in any new requirements across the UK and for this reason we strongly believe that a legislative framework would be the best approach.
6. In addition, at the October 2017 meeting of the Joint Ministerial Committee on EU Negotiations (JMC(EN))<sup>5</sup>, the four governments (with Northern Ireland represented by civil servants) agreed that common frameworks should be established where they are necessary to ensure the UK can negotiate, enter into and implement new trade agreements and international treaties. A common framework covering the commercial movement/trade of pet animals would also be a sensible approach from this perspective.

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<sup>5</sup> <https://www.gov.uk/government/publications/joint-ministerial-committeecommunique-16-october-2017>

7. It is also important to note that as a member of the EU, the UK has access to the Trade Control and Expert System (TRACES), an effective online system that enables Member States, including the UK, to follow all commercial movements of animals into and out of the UK. This permits animals to be traced so that post import checks can be carried out and is invaluable when animals have to be traced as a result of disease outbreak. However the European Commission has made clear that access to TRACES is only permissible if a country is a member of the single market, as TRACES is linked to Regulation 882/2004.
8. Access to TRACES after the UK leaves the EU will therefore depend on whether or not the UK remains in the single market, or if any special provision is made for the UK if it leaves the single market. Currently Defra is working on the basis that the UK will no longer have access to TRACES and, if this is the case, it is crucial that any system that replaces it is not a backwards step. It would also be sensible for a legislative framework agreement to ensure that any new system is used across the UK to ensure consistency and traceability.

## **2 Animal welfare**

### **2.1 The welfare of dogs and cats during transport**

1. The UK Government's provisional assessment of where common UK frameworks might be required after Brexit recommends further, detailed discussion on the need for a legislative framework agreement on animal welfare. However, whilst the assessment document states that the movement of livestock should be covered in this, it doesn't explicitly state that the welfare of companion animals during transport should also be included.
2. The transport of dogs and cats in the EU in connection with an economic activity is governed by Regulation No 1/2005 on the protection of animals during transport. This requires that the animals are fit to travel - cats and dogs of less than eight weeks cannot be transported unless they are accompanied by their mother - and must not be transported in a way likely to cause them injury or undue suffering.
3. The European Commission previously committed to adopting detailed rules for the transport of dogs and cats following the adoption of an opinion on this topic by the European Food Safety Authority in 2004. However, despite this, the Commission has never proposed additional rules to protect dogs and cats and so it remains that there are few specific rules for these species.
4. Defra has recently published a call for evidence on improving animal welfare during transport after the UK leaves the EU, and Dogs Trust will be responding by the deadline of 22<sup>nd</sup> May. We strongly believe that post-Brexit further detailed rules should be introduced to protect the welfare of dogs and cats during transport. As this involves the transport of dogs and cats across borders, it is important to have a coordinated approach across the UK. As explained above, we are already aware of the great lengths importers will go to, to change their tactics to avoid being caught illegally transporting puppies. For these reasons, we

believe a legislative framework agreement would be the preferred approach, as suggested in the UK Government's assessment document.

## **2.2 The sale and import/export of dog fur**

1. Regulation No 1523/2007 places a ban on the sale of dog and cat fur within the EU, as well as its import or export. We strongly believe that this ban should be retained once the UK exits the EU, and a legislative framework agreement would also be the preferred approach to ensure this.

## **2.3 Sentencing (taking convictions into account)**

1. The UK Government's provisional assessment of where common UK frameworks might be required suggests that a non-legislative common framework may be required on sentencing (taking convictions into account). We agree that a common framework is needed on this policy area, but it is important that this explicitly includes animal related convictions. This should, for example, include convictions under animal health and welfare legislation as well as any animal related convictions under fraud legislation.
2. We would recommend that further discussions take place to better understand why a non-legislative framework has been suggested for this policy area, rather than a legislative framework.

## **Q3. Do you have any specific concerns about the proposed categorisation?**

1. As outlined above in response to Question 2, Dogs Trust broadly agrees with the proposed categorisation.
2. In the policy areas of animal health and traceability and animal welfare, we recommend the Government progresses legislative common frameworks to ensure there is consistency across the country. Whilst our own work has focused on the movement of animals from Central and Eastern Europe into the UK, work via Operation Delphin has uncovered puppies and dogs entering the UK from Ireland. As a result a joined up approach is needed.
3. However, we do believe that further issues such as the welfare of companion animals in transport must be explicitly included in these legislative frameworks.
4. Furthermore, we also recommend that further discussion takes place around whether a legislative or non-legislative framework would be the best approach to cover the policy area of sentencing.

#### **Q4. How should both the legislative and non-legislative frameworks be developed and implemented?**

*1.1 Regulation (EU) No 576/2013 on the non-commercial movement of pet animals; Commission Implementing Regulation (EU) No 577/2013; Commission Delegated Regulation (EU) No 1152/2011*

1. Regulation No 576/2013 sets out the requirements for dogs, cats and ferrets which are moved for non-commercial purposes between EU Member States or into the EU. This is otherwise known as the Pet Travel Scheme (PETS) and requires all dogs, cats and ferrets which are moved between or into Member States to be microchipped, vaccinated against rabies and to have a valid pet passport. The Implementing Regulation No 577/2013 sets out the model identification documents for pet movement. Delegated Regulation No 1152/2011 requires dogs being moved into four Member States, including the UK, to be treated against the tapeworm *Echinococcus multilocularis* from 120 to 24 hours before travel. The key improvements we recommend to the legislation on non-commercial pet travel are:
  - a. Rabies antibody titration test. It has always been known that a small but significant number of animals do not mount an adequate immune response following vaccination against rabies. Mansfield et al. 2004 found that 4.12% of dogs and 2.85% of cats tested failed to demonstrate sufficient antibodies against the rabies virus. This study also found that dogs less than six months old had a significantly higher chance of failing a blood test. Another study (Klevar et al. 2015) showed that a significant proportion (53%) of imported rescue dogs from Eastern Europe failed to demonstrate a sufficient antibody level. Moreover, 41% of the dogs had woefully inadequate antibody levels. We therefore recommend the reintroduction of rabies blood testing before entry into the UK. This would help protect the UK from the risk of rabies.
  - b. Post rabies antibody titration test wait period. Under Regulation 576/2013 dogs, cats and ferrets entering a Member State from a Third Country or Territory must undergo a rabies antibody titration test. The validity requirements are for the blood test to be carried out at least 30 days after the date of vaccination and for there then to be a 3 month wait period before the pet animal is moved between countries. The average incubation period for naturally occurring rabies in dogs, cats and ferrets varies depending on the reference, with some sources stating 3-8 weeks (Greene, 2012) and others stating 3-12 weeks. To minimise the risk of disease we would support a wait period after the rabies blood test before entry into the UK, which is in line with the incubation period of rabies. Such a wait period would also make it easier to differentiate between adult dogs and those that are too young to legally enter the country.
  - c. Reduce the number of dogs allowed as a non-commercial movement. The current PETS rules allow up to five pet animals to be moved by one owner or authorised

person under the scheme. However, Dogs Trust's puppy smuggling investigations found that traders were moving up to five animals at a time as a way of side-stepping the additional requirements of the commercial movement legislation. We would therefore recommend that this limit is reduced. For puppies, we recommend that a maximum of two dogs under six months can be moved at a time; whilst families may wish to travel with a puppy it would be rare for them to do so with more than two puppies. For all dogs, including adult dogs, we recommend an overall limit of three dogs. Murray et al. (2010) estimated that the majority of UK households owning dogs had only one dog (73.3%), 18.9% owned two dogs and 4% owned three dogs. Therefore, by setting the limit at three dogs up to 96.2% of families would be able to travel with their pet dogs. For families wanting to travel with four or five dogs, we would suggest that a very tightly regulated exemption could be introduced. We would be happy to work with the government on the wording of such an exemption.

- d. Tick treatment. We recommend that a requirement is reintroduced for dogs and cats to be treated against ticks before entering the UK, to prevent parasites such as *Babesia canis* and *Ehrlichia canis* being introduced into the UK. This could be based on the previous requirement for tick treatment prior to 2012, where pets had to be treated for ticks 24-48 hours before travel. A recent surveillance study of ticks infesting domestic dogs across the UK highlights the importance of appropriate treatment against ticks for dogs travelling outside of the UK. It found that 77% of dogs which had travelled were carrying attached ticks. The importance of tick treatment is also highlighted by the cluster of cases of canine babesiosis which were reported in Harlow and Romford in 2016, as well as more recently in Hertfordshire in 2017. It is further highlighted by the importation of a *Hyalomma lusitanicum* tick into the UK in 2016, a type of tick which can carry and transfer Crimean-Congo haemorrhagic fever (CCHF) virus to humans.
- e. Tapeworm treatment. We support the continued requirement for *Echinococcus multilocularis* (EM) tapeworm treatment before entry into the UK but recommend shortening the treatment window from 24-120 hours to 24-48 hours, as previously required. This timescale should be reduced because the larger the treatment window, the greater the chance of reinfection. Furthermore, currently it is possible to tapeworm treat your dog in the UK, go to mainland Europe and return to the UK within 120 hours without further tapeworm treatment being required before re-entering the UK. With there being no residual effect of anthelmintics this is a huge concern as a possible route of EM infection into the UK. We also support the reintroduction of tapeworm treatment for cats.
- f. Centrally accessible database. For non-commercial movements, although pets are travelling with a passport, there is no traceability of that animal entering GB, in terms of where it entered and when. This information would be critical if there were an outbreak of disease to help identify the level of risk, i.e. a dog that entered GB 6

months ago is going to be at much lower risk of carrying rabies than one which entered 6 weeks ago. We therefore recommend the development of a centrally accessible database logging dogs' microchip numbers, and date of entry, at the point of entry into the UK. This would help welfare organisations to undertake a risk assessment for any stray animals coming into their care and, in the aforementioned event of a disease outbreak it would enable control measures to be most effective.

- i. Although pet animals entering the UK are required to be microchipped, there is currently no requirement for them to be registered on a database. We would also recommend that this is rectified to require registration on a database which is also linked to a European database such as Europetnet.
- g. Carriers. The enforcement of the legislation on pet movement should be shifted to government agencies rather than the carriers. Currently, various challenges are placed on the carriers to undertake checks on pets that are travelling, such as identifying whether pet passports are fraudulent and whether puppies are over 15 weeks of age. We recommend that it would be appropriate for checks to instead be undertaken by a qualified animal professional from a Government agency.

#### *1.2 Council Directive 92/65/EEC of 13 July 1992 laying down animal health requirements governing trade in and imports into the Community of animals, semen, ova and embryos; Directive 2013/31/EU amending Council Directive 92/65/EEC*

1. Directive 92/65/EEC (Balai Directive) sets out the animal health requirements for animals being moved between or into Member States for commercial purposes. When more than five dogs, cats and ferrets are being moved, this Directive also applies regardless of whether the movement is for a commercial purpose (unless the animals are being moved for the purpose of participating in competitions, exhibitions or sporting events). This Directive also applies to the movement of animals for rehoming purposes i.e. any animal that is being moved for the sole purpose of change of ownership is considered to be a commercial activity, irrespective of any financial gain, and must therefore comply with this Directive. Directive 2013/31/EU amends Directive 92/65/EEC to bring it in line with the requirements for dogs, cats and ferrets under Regulation No 576/2013 (see above).
2. In addition to the requirements set out in Regulation No 576/2013, these Directives require that animals must come from a holding or business registered in the EU country of origin. Importers must obtain a health certificate (issued from the European Commission's TRACES website) for each movement of animals. An authorised vet must carry out a clinical examination of each animal ensuring they are fit to travel, within 48 hours before travel.
3. All the recommendations that we have proposed in respect of the health requirements for non-commercial movements of dogs, cats and ferrets entering the UK should also be

implemented for commercial movements. The key additional improvement we recommend is:

- a. Checks at point of destination. There is currently a lack of checks at ports for compliance with Directive 92/65/EEC, as checks take place at the arrival destination. In order to facilitate this, the animals have to stay at the point of destination for 48 hours post import. Less than 10% of consignments are checked at the place of destination, effectively a document and identity check of the paperwork rather than the animals involved. This is extremely concerning as there is clear potential for cases of illegal importations to be missed and so this should be addressed in future legislation.

### *1.3 Council Regulation (EC) No 1/2005 on the protection of animals during transport and related operations*

1. The transport of dogs and cats in the EU in connection with an economic activity is governed by Regulation No 1/2005 on the protection of animals during transport. This requires that the animals are fit to travel - cats and dogs of less than eight weeks cannot be transported unless they are accompanied by their mother - and must not be transported in a way likely to cause them injury or undue suffering. Cats and dogs transported over less than 50 km are not covered by these rules. The European Commission had committed to adopting detailed rules for the transport of dogs and cats after the adoption of an opinion on this topic by the European Food Safety Authority. Despite this opinion being published in May 2004, the European Commission has never proposed any additional rules to cover dogs and cats. The key improvement we recommend to the legislation on the welfare of dogs and cats during transport is:
  - a. Specific requirements for the transport of cats and dogs. Specific requirements to ensure the welfare of dogs and cats should be introduced in future legislation.

### *1.4 Regulation (EC) No 1523/2007 banning the placing on the market and the import to, or export from, the Community of cat and dog fur, and products containing such fur*

1. Regulation No 1523/2007 places a ban on the sale of dog and cat fur within the EU, as well as its import or export. Our position on this legislation is:
2. Retain the ban on dog and cat fur. We support the retention on the ban on cat and dog fur due to the inherent cruelty in this trade as there could be incentives for the trade to re-start into the UK should the ban be rescinded. This would be unacceptable to the British public and must be prevented.

### *1.5 Regulation (EU) 2016/429 on transmissible animal diseases and amending and repealing certain acts in the area of animal health ('Animal Health Law')*

1. Regulation 2016/429 was adopted in March 2016. It streamlines almost 40 EU legal acts related to animal health into a single law. Intended as a framework law, the Regulation itself

only lays down general principles and basic rules. This is an important new Regulation as it will repeal both Regulation 576/2013 and Directive 92/65 (both outlined above). Although the Animal Health Law will apply from 21 April 2021, Regulation (EU) No 576/2013 shall continue to apply until 21 April 2026. Detailed provisions under the Animal Health Law are still to be established by delegated or implementing acts. Our key recommendation on this legislation is:

2. Input into delegated and implementing acts. Although the UK has committed to exiting the EU, ensuring that the Animal Health Law is as robust as possible is still in the UK's interest. Dogs and cats travelling to the EU from the UK will still have to comply with this Regulation. We therefore recommend that the UK government continues to input into EU negotiations on the relevant implementing and delegated acts under the Animal Health Law.

## References

Dogs Trust (2014). The Puppy Smuggling Scandal <https://www.dogstrust.org.uk/media-centre/puppy%20smuggling%20report%202014.pdf>

Dogs Trust (2015). Puppy Smuggling: The Scandal Continues [https://www.dogstrust.org.uk/puppysmuggling/final%20use%20this%20one%20puppy%20smuggling\\_2.8.pdf](https://www.dogstrust.org.uk/puppysmuggling/final%20use%20this%20one%20puppy%20smuggling_2.8.pdf)

Dogs Trust (2017). Puppy Smuggling: A Tragedy Ignored [https://www.dogstrust.org.uk/puppy-smuggling/puppy%20smuggling%20report\\_final%20pdf.pdf](https://www.dogstrust.org.uk/puppy-smuggling/puppy%20smuggling%20report_final%20pdf.pdf)

Greene, C. E. (2012). Rabies and other Lyssavirus infections. In: Infectious diseases of the dog and cat, 4th Edition. Saunders-Elsevier, London, pp.187.

Klevar, S., Høgåsen H. R., Davidson R. K., Hamnes I. S., Treiberg Berndtsson L., and Lund A. (2015). Cross-border transport of rescue dogs may spread rabies in Europe. *Veterinary Record*; 176:672

Mansfield, K. L., Sayers R., Fooks A. R., Burr, P. D. and Snodgrass D. (2004). Factors affecting the serological response of dogs and cats to rabies vaccination. *Veterinary Record*; 154:423-426

Murray, W. J., Browne, M. A., Roberts, A., Whitmarsh, T. J. and Gruffydd-Jones, J. K. (2010). Number and ownership profiles of cats and dogs in the UK. *Veterinary Record* 166, 163-168

## **Q5. How prescriptive should the common frameworks be and how much discretion should each administration have within the frameworks?**

1. For common frameworks to be effective on the policy areas outlined in this response, we believe it is important for them to be prescriptive. This is important to ensure consistency across the UK and to ensure that any differences in the requirements cannot be exploited, for example by those attempting to import dogs into Great Britain illegally.

2. Following the UK's exit from the EU, Northern Ireland will still have a land border with an EU Member State. We are already aware from Operation Delphin that thousands of puppies have travelled from the Republic of Ireland, through Northern Ireland and across to the port of Cairnryan, Scotland. In addition, ferries operate between the Republic of Ireland and the UK, including the port of Holyhead.
3. Given that there are no border checks between the Republic of Ireland and Northern Ireland, it is impossible to prove whether a dog originated from the Republic or Northern Ireland, making Belfast to Cairnryan (and similar passages) lucrative routes for individuals involved in illegal importation. Notwithstanding the political issues of the border in Ireland, from this perspective, it would be preferable to treat the island of Ireland as one, although we acknowledge that logistically this would be challenging not to disadvantage citizens of Northern Ireland. If this is not possible, it is imperative that better checks are introduced at the ports in Cairnryan, Holyhead and Fishguard.
4. Furthermore, any new legislation, and any agreement between the Republic of Ireland and the UK, should take this into account to ensure that such routes do not become more lucrative for the puppy trade. In addition, from a disease perspective, we also need to treat the island of Ireland as one biological unit; disease does not recognise nor respect borders.