



Animal &
Plant Health
Agency

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[REDACTED]
{By Email}

Our Ref: ATIC1140

8 September 2017

Dear [REDACTED]

PROVISION OF REQUESTED INFORMATION

Thank you for your request for information which we received on 11 August 2017. Your request has been handled under the Freedom of Information Act 2000.

The information you requested and our response is detailed below:

“Please could I refine the request so that I am only seeking: Notes from formal meetings involving APHA and the Dogs Trust since and including 2010.”

Please see attached at Appendices 1 to 14 the information you have requested.

Where we have redacted text in the Appendices, we have withheld this information under section 40(2) read in conjunction with 40(3)(a)(i) of the FOIA.

Section 40

Section 40(2) read in conjunction with 40(3)(a)(i) of the FOIA provides that personal data relating to third parties is exempt information if disclosure would breach the Data Protection Act 1998 (DPA). This is an absolute exemption and does not require a public interest test.

APHA consider that disclosure of this information is likely to breach the first data protection principle in Schedule 1 of the DPA, which relates to the fair and lawful processing of personal data, in two ways. First, disclosure would not constitute ‘fair’ processing of the personal data, second, disclosure would not satisfy any of the conditions for data processing set out in Schedule 2 to the DPA. Therefore, we have concluded that this information is exempt from disclosure under section 40(2) of the FOIA

In addition there has been one document withheld in its entirety, which are notes from one meeting involving the APHA Intelligence Unit and the Dogs Trust. This has been withheld under section 31(1)(g), which refers to Law Enforcement.

Section 31

This section advises that any information is exempt if its disclosure would be likely to prejudice any public authority carrying out its functions for any of the purposes specified in subsection (2) of section 31.

The relevant functions in subsection 2 of this exemption are:

- a) the purpose of ascertaining whether any person has failed to comply with the law,
- b) the purpose of ascertaining whether any person is responsible for any conduct which is improper,
- c) the purpose of ascertaining whether circumstances which would justify regulatory action in pursuance of any enactment exist or may arise.

The exemption in section 31 is subject to a Public Interest Test to ensure it is being appropriately applied.

Public Interest Test

We recognise that there is a public interest in disclosure of this specific information in order to increase transparency and aid well-informed debates concerning our work, the importation of dogs and the individuals associated with them.

However, the public interest in withholding the information arises from the fact that investigations concerning this information are ongoing and sensitive. Release of it will disrupt this process and would be likely to prejudice the ability for the Local Authorities, HMRC and Police to perform those functions mentioned in subsection 2 of the exemption.

Therefore we have concluded the public interest in withholding this part of the information outweighs that in disclosure.

Information disclosed in response to this FOI request is releasable to the public. In keeping with the spirit and effect of the FOIA and the government's Transparency Agenda, this letter and the information disclosed to you may be placed on GOV.UK, together with any related information that will provide a key to its wider context. No information identifying you will be placed on the GOV.UK website.

I attach an Annex which explains the copyright that applies to the information being released to you and contact details should you be unhappy with the service you have received.

If you have any queries about this letter, please contact the Access to Information Team at the email address below or postal address at the top of this letter.

Yours sincerely

ACCESS TO INFORMATION TEAM

Email: enquiries@apha.gsi.gov.uk

Annex

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Complaints

If you are unhappy with the result of your request for information you may request an internal review within 40 working days of the date of this letter.

If you wish to request an internal review, please contact: The Access to Information Team at enquiries@apha.gsi.gov.uk or at the postal address at the top of this letter, who will arrange for an internal review of your case.

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. Please note that generally the Information Commissioner cannot make a decision unless you have first exhausted APHA's own complaints procedure. The Information Commissioner can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

FIRST MEETING OF GB EXOTIC DISEASE CORE GROUP FOR RABIES

17th Sep 2014. 15:00 – 16:30. Rm 503, Nobel House, London.

Attendees:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] Defra (Chair)
[REDACTED] Defra
[REDACTED] Defra
[REDACTED] AHVLA VENDU
[REDACTED] Welsh Government (Telecon)
[REDACTED] Welsh Government (Telecon)
[REDACTED] Scottish Government (Telecon)
[REDACTED] Scottish Government (Telecon)

Apologies:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

AHVLA VENDU
Welsh Government
Scottish Government
Scottish Government

Agenda:

1. Introductions.
2. Ways of Working.
3. The work programme for the group: feedback from the “burning issues” exercise.

Action: Second Core Group meeting in January 2015 (date to be confirmed) to be dedicated to EU Pet Travel Scheme and associated issues.

Action: Policy Team to circulate a list of issues for Core Group comment that could form the basis of the group’s work programme.

4. AOB.

Action: Policy Team to re-circulate date options for next meeting in January 2015. Core Group to respond by end of September.

SECOND MEETING OF GB EXOTIC DISEASE CORE GROUP FOR RABIES

25th February 2015. 12:00 – 13:30. Rm 204, Nobel House, London.

Attendees:

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██████████ (Telecon)
██████████ (Telecon)
██████████ (Telecon)
██████████ (Telecon)

██████████ Defra (Chair)
██████████ Defra
██████████ Defra
██████████ Defra
██████████ APHA VENDU
██████████ Welsh Government (Telecon)
██████████ and Scottish Government (Telecon)
██████████ Scottish Government (Telecon)

Apologies:

██████████
██████████
██████████ Defra
██████████ Welsh Government
██████████ Welsh Government
██████████ Scottish Government

Agenda:

1. Welcome and introductions.
2. Actions from last meeting.

Action: Secretariat to circulate agreed minutes of first meeting.

3. Introduction of draft work programme.

Action: Secretariat to circulate agreed work programme.

4. Presentation – Pet Travel Scheme: facts, figures and illegal puppies (██████████).
5. Presentation – Pet Travel Scheme: view from the companion animal sector (██████████).

6. Discussion.

Action: [REDACTED] to feed discussion points on the different elements of rabies risk into PHE's presentation on Managing the Risk to Human Health at the April meeting.

7. Presentation and discussion – Reporting suspicion of rabies ([REDACTED]).

8. Conclusions and round up of preparations for the next meeting.

Action: Meetings to be extended from one and a half hours to two hours. Secretariat to confirm date of April meeting.

THIRD MEETING OF GB EXOTIC DISEASE CORE GROUP FOR RABIES

22nd July 2015. 14:00 – 16:30. Rm G33, Nobel House, London.

Attendees:

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██████████████
██████████████
██████████████ (Telecon)

██████████ Defra (Chair)
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██████████████ Defra
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██████████████ APHA VENDU
██████████████ Welsh Government (Telecon)
██████████████████ Scottish Government (Telecon)
██████████████ Scottish Government (Telecon)

Apologies:

██████████
██████████████ Welsh Government
██████████████ Welsh Government
██████████████ Scottish Government

Agenda:

1. Welcome and introductions.
2. Actions from last meeting.

Presentation of table on illegal importation of pet animals (paper RCG 3/A)

Action: Secretariat to circulate agreed minutes of Second meeting.

Action: ██████████ and ██████████ to look at paper RCG 3/A and report back to the Core Group at the October meeting with findings.

3. Presentation and discussion: Illegal Landings and Dealing With Them Inland - ██████████
██████████ and ██████████.

Presentation of table of Core Group members experiences of reporting of and dealing with non-compliances (paper RCG3/B).

Action: Secretariat will contact Core Group members to discuss how to take forward actions set out in RCG 3/B.

Action: [REDACTED] to examine methods by which local authorities can be contacted by vets and to examine systems for intelligence sharing.

4. Presentation and discussion: Managing The Risk To Human Health and Occupational Rabies Vaccine Review - [REDACTED] and [REDACTED].

Action: Core Group members to send comments to [REDACTED] and [REDACTED] on their presentation by COP Friday 18 September.

5. Presentation and discussion: Case Studies of Recent Rabies Outbreaks in Europe - [REDACTED]

Action: Core Group members to respond to questions set in presentation –

- **How would my sector/organisation be involved in the outbreak response?**
- **What would the key issues be for my sector/organisation?**

Comments should be sent to [REDACTED] by COP Friday 25 September.

6. Conclusions and round up of preparations for next meeting.

Action: Secretariat to contact Core Group members to ascertain availability for three proposed dates (7th, 13th & 27th) for the October meeting and to look at potential dates for January 2016 meeting.

Action: Secretariat to circulate copies of meeting presentations and a Weblink to the Rabies Control Strategy posted on .gov.uk

**Meeting with Dogs Trust and RSPCA on illegal trade in puppies
3 August 2015
Room 501, Defra, Nobel House, Smith Square, London SW1P 3JR
Outcome of discussions and agreed actions**

Attendees

Nigel Gibbens	Chief Veterinary Officer Defra, Chair
██████████	Pet Travel and Rabies team, Defra
██████████	Imports and EU Trade, Defra
██████████	Imports and EU Trade, Defra
██████████	Veterinary and Science Policy Team, Defra
Chris Hadkiss	Chief Executive, APHA
██████████	Veterinary Head of International Trade, APHA
██████████	Field Services - South East, APHA
██████████	RSPCA
██████████	RSPCA
██████████	RSPCA
██████████	Dogs Trust
██████████	Dogs Trust

Apologies

██████████ Field Services - South East, APHA

Outcome of discussions

1. Nigel Gibbens confirmed CVOs in other Member States took the issue of illegalities to exploit the pet travel scheme or Balai movements seriously and would welcome more intelligence.
2. Chris Hadkiss advised that ██████████, Director South East, leads for APHA on the illegal trade in dogs and puppies.
3. Border Force mechanisms can be used to collate a range of data from national and local government sources. This can be supplemented with intelligence from organisations outside of government.
4. There is a large variation in Local Authority interest and knowledge and difficulty in sharing intelligence within and between authorities.

5. Agreement that exchange of information and intelligence between could be improved.

Agreed actions

1. APHA's Centre for International Trade will identify what information is available on individuals, vehicles and consignments to inform targeted investigations for both pet travel and Balai movements.

2. Dogs Trust agreed that it could offer assistance (e.g. quarantine costs) to ease pressure on Local Authorities resources which result from targeted initiatives such as Operation Bloodhound.

3. ██████████ will take responsibility intelligence and data supplied from outside organisations is acted on where appropriate.

4. Defra CVO will provide evidence to CVOs in other Member States where illegalities to exploit the pet travel scheme or Balai movements have been identified.

5. APHA will lead on improving planning for incidents where illegalities are suspected or identified including providing assistance to Local Authorities.

6. Dogs Trust would continue to provide training on evidence gathering and Police and Criminal Evidence requirements for Local Authorities.

7. Defra (Pet Travel team) will look at additional Pets Order sanctions that could be used to support enforcement as part of the Post Implementation Review of the pet travel scheme.

8. APHA to identify, on a port by port basis, how enforcement is carried out and resources (e.g. out of hours veterinary support, quarantine facilities) that are available.

9. Defra (Pet Travel team) to revisit guidance to Local Authorities on legislative action available when a suspected illegally landed dog is discovered.

10. RSPCA to review Defra guidance to Local Authorities on legislative action and provide feedback to the Defra Pet Travel team.

11. Defra (Pet Travel team) to liaise with Ministry of Justice colleagues to identify sanctions available and sentencing guidelines when cases of illegally landed dogs are brought to court.

12. Defra will convene a workshop in December 2015 with the aim of identifying and reviewing a range of potential mechanisms to address the known problems.

13. Defra will initiate quarterly stock take meetings with stakeholders to review activity and identify related results with the first being October 2015.

FOURTH MEETING OF GB EXOTIC DISEASE CORE GROUP FOR RABIES

13th October 2015. 14:00 – 16:30. Conference Room D, Nobel House, London.

Attendees:

██████████	████████████████████	Defra (Chair)
██████████████████	██████████	Defra
██████████████████	██████████	Defra
██████████████████	██████████	Defra
██████████████████	██████████████████	Defra
██████████████████	██████████████████	APHA VENDU
██████████ (Telecon)	██████████	Welsh Government (Telecon)
	██████████████████	Scottish Government (Telecon)
	██████████	Scottish Government (Telecon)

Apologies:

██████████████████	
██████████████████	Welsh Government
██████████████████	Welsh Government
██████████████████	Scottish Government

Agenda:

1. Welcome and introductions.

- The group was informed that policy responsibility for the EU pet travel scheme has transferred from Exotics to the Import and EU Trade team. ██████████ has taken over from ██████████ as the lead official. ██████████ was introduced as the new VA with responsibility for rabies, replacing ██████████.

2. Outstanding actions from last meeting.

- Note of third meeting agreed. Action 4:1 – secretariat to circulate finalised minutes of third meeting.
- Update on action 3:2 & 3:3 – ██████████ tabled paper RCG 4/B by way of an update on the ideas Group members had suggested to tackle abuse of the EU pet travel scheme. Many of the ideas will be considered by a new high-level stakeholder group on illegal movement of puppies chaired by the CVO, which the Group welcomed. ██████████ gave a verbal update on the remaining issues, with those concerning BCT to be dealt with offline with ██████████. Action 4:2 – ██████████ to discuss with ██████████.
- Update on action 3:4 – ██████████ reported that the National Panel would be writing to LAs to remind them of protocols for dealing with out of hours illegal landing cases. ██████████ also reported that ██████████ would be investigating the linking of various LA intelligence sharing systems.
- Update on action 3:5 – The deadline for comments on Public Health England’s presentation on ‘Managing The Risk To Human Health and Occupational Rabies

Vaccine Review' was extended to mid-November. Action 4:3 – secretariat to re-circulate presentation and Group members to send comments to [REDACTED] and [REDACTED] by Friday 13 November.

3. Presentation and discussion: Outbreak Response and Control Measures – [REDACTED]

- [REDACTED] gave a presentation about the legal powers, control measures and emergency response structures that would come into play if a case of rabies was confirmed in GB.
- Following discussion, the group agreed that **outbreak scenarios, compensation, exit strategies** and **vaccination** are issues the Group could usefully look at, with a view to updating disease control strategies. Action 4:4 – secretariat to plan how to take this work forward, working with the Group.

4. Presentation and discussion: Role of Local Authorities in Preparedness and Response – [REDACTED]

- [REDACTED] flagged the setting up of detention pounds for stray dogs (that would be viewed with concern during any rabies outbreak) as the most problematic task for Local Authorities. New requirements for all dogs to be microchipped should help reunite dogs with their owners. It was noted that rehoming charities would not have spare capacity to rehome strays but would be well-placed to advise on temporary pounds, to ensure welfare needs are met.
- Swift communication of positive and accurate messages was highlighted as a key outbreak issue. Welfare charities and veterinary bodies would be an important source of information to the public, including through social media.

5. Presentation and discussion: Rabies in the Media – [REDACTED].

- To set the scene for the next core group meeting (on outbreak communications), [REDACTED] - a social and cultural historian from the [REDACTED] - gave a presentation about the history of the representation of rabies in the media and how the politicisation of rabies (in various ways over the last 150 years) sets it apart from other exotic diseases.
- Following this presentation, the group was asked to respond to the following questions in advance of the next meeting in January:
 - The representation of rabies in the media – what can my organisation / sector do to influence this?
 - What are the key messages to get across to the public in a rabies outbreak?
 - What role could my organisation / sector play in making this happen?
- Action 4:5 – the Group to provide responses to the secretariat by 24 December.

6. Conclusions and round up of preparations for next meeting.

- Next meeting confirmed as Tuesday January 12th 2016 – 14:00 to 16:00.

Illegal Movement of Dogs and Puppies meeting

3 November 2015 – 14:30-16:00

809 Millbank, Smith Square, London SW1P 3JR and teleconference

Summary note

Attendees

<u>Dogs Trust</u>	██████████	Veterinary Director
	████████████████████	Director of Communications
<u>RSPCA</u>	██████████████████	Government Relations Manager
	████████████████████	Government Relations Manager
<u>NAHWP</u>	██████████████████	National Animal Health & Welfare Panel and City of London Corporation
<u>Defra</u>	██████████████████	Imports and EU Trade
	██████████████████	Pet Travel Scheme Policy
	████████████████████	Pet Travel Scheme Policy
<u>APHA</u>	██████████████████	Head of Field Delivery for South East and South West England
	████████████████████	Veterinary Head of International Trade
	████████████████████	Head of Regulatory Affairs
	██████████████████	Field Services Team Leader – Dover
	██████████████████	Animal Health Officer – South East
	██████████████████	Field Services Team Leader – South East

Apologies

APHA	██████████	Head of International Trade
RSPCA	██████████	Head of Public Affairs

1.0 Introduction

1.1 █████ welcomed everyone to the meeting. █████ explained that, since early October, policy responsibility for the EU Pet Travel Scheme (PTS) had transferred from Defra's Exotic diseases (Rabies) team to the Imports and EU Trade team. Today represented the first quarterly meeting of the new stakeholder group set up by the UK Chief Veterinary Officer (CVO) to specifically explore how abuse of the PTS could be better tackled.

2.0 Roles and responsibilities

2.1 To provide context, the roles and responsibilities of key organisations involved or interested in the implementation of the PTS were outlined.

The Animal and Plant Health Agency (APHA)

2.2 █████ explained that APHA was in the process of drafting a paper that will summarise its statutory duty to regulate and advise on the PTS under the Non-Commercial Movement of Animals Order 2011. This will set out its different roles, for example in: issuing pet passports to Official Veterinarians; authorising approved carriers and

approved routes; carrying out monitoring and evaluation activity; and giving advice to members of the public. The paper will clarify that APHA does not have PTS enforcement powers which typically rest with Local Authorities.

Action 1: APHA to circulate draft PTS roles and responsibilities paper to group.

- 2.3 ■ explained how APHA carries out risk-based checks on imports of movements made under the Balai Directive. Infringements are flagged and intelligence may then be shared with the relevant Local Authority and their Trading Standards departments, as appropriate. It was important to note that checks are made of notified movements of animals, of which the majority are compliant. Abuse of the PTS may involve outright smuggling, i.e. puppies or dogs are purposely not declared to pet checkers, moving non-compliant pets, e.g. underage, incorrectly vaccinated against rabies or lacking *Echinococcus multilocularis* treatment, etc., or using the PTS to move animals for commercial purposes.
- 2.4 ■ stated that the Dogs Trust has anecdotal evidence suggesting people are targeting non-social hours, i.e. at nights and weekends, to make non-compliant movements. ■ confirmed that APHA officers work shifts and are not available overnight and that there was typically not veterinarian support, except for in the case of emergencies (at Dover). Resources are targeted on a risk-based approach, explaining why cover is greater at the busier port of Dover than elsewhere.
- 2.5 ■ and ■ advised they had detected a varying ability and appetite to follow-up reports of PTS abuses across different local authorities in South East England. How does APHA and the Government ensure their regulatory duty is enforced? ■ replied advising that the National Local Authorities Panel (NLAP) offers PTS-related training and gives advice to local authorities, which regional APHA offices also contribute towards. However, it was noted that local authorities are independent of Government and are therefore responsible for setting their own agendas, based on local circumstances and priorities. Decreasing local authority resources mean that Animal Health Officers must compete for funding support, which can be very challenging.
- 2.6 APHA reports patterns of repeated PTS issues and or one-off serious infringements to Defra. The CVO has previously acted on this information to write to the CVOs of other Member States, which has led to follow-up action being taken, for example Lithuania put in place a range of processes aimed at strengthening its pet passport regime, including suspending the ability of private veterinarians to issue pet passports.

Local Authorities

- 2.7 ■ explained that local authorities have a duty to enforce PTS legislation, including under the Non-Commercial Movement of Pet Animals [Order](#) (NCMPAO) 2011, Rabies (Importation of Dogs, Cats and Other Mammals) (Amended) [Order](#) 1974 and Trade in Animals and Related Animal Products [Regulations](#) (TARP) 2011. Many are willing to enforce PTS infringements, but resourcing is a big issue. ■ felt that the legislation

has its limitations and could be improved, e.g. TARP is more applicable for third country (non-EU) movements and the NCMPAO doesn't allow an Animal Health Officer to seize pet passports for use as evidence. Guidance to local authorities on implementing the NCMPAO was published in 2013. The Scottish Government is currently updating this document in light of the PTS EU Regulation 576/2013 coming into force in December 2014.

2.8 Where post-import checks reveal PTS or Balai Directive (used for commercial imports) infringements, local authorities typically find that these relate to puppies being under-age. Most work is referred to local authorities by commercial vets and the costs of attending these can be considerable, e.g. the City of London Corporation spends about £40,000 a year; this would actually be more if it had to cover all of the costs for seized animals' quarantine charges. It was suggested that data on local authority costs (and also those incurred by the RSPCA) for their work investigating and processing cases of non-compliant animals could form a useful proxy to communicate the scale of the problem.

2.9 ■ highlighted two concerns:

i. Private sector vets being unable to contact local authority Trading Standards officers out of normal office working hours. ■ is trying to overcome this by re-routing veterinarians' enquiries through the Citizens Advice Bureau; and

ii. Time and resource cost: police and trading standards officers can spend considerable time and effort investigating a single non-compliant animal case.

Border Force

2.10 ■ outlined how the Imports and EU Trade team had worked with Border Force throughout 2015 to develop a Defra-Border Force National Agreement which will, for the first time, give an overarching strategy for this relationship. Defra previously relied on local agreements with Border Force, but the new agreement clarifies working arrangements at a strategic level and has established a clear process for Defra to bid for Border Force resourcing support on priority areas. This new joined-up approach could bring benefits for PTS work, but any requests will need to be considered in the round of interests that Border Force has to assess and act upon, e.g. on biosecurity, wider criminal activity, drug smuggling and national security, etc.

2.11 The agreement could provide this group a route to involve Border Force in its work by linking up with other cross-cutting initiatives to receive, analyse and assess intelligence. There could be opportunities for building a better evidence base for targeting resources more effectively. Other partners, such as HM Revenue & Customs, may also have an interest (e.g. in tax evasion) and, in some cases, the illegal puppy trade could potentially link to wider organised crime. Border Force has indicated that it is open to a discussion about receiving data on the illegal movement of dogs and puppies and jointly working with other organisations.

2.12 ■ highlighted that recent Spending Review decisions would also impact Border Force's available resources. ■ replied that whilst this was true, Border Force recognises that concerns over PTS abuses are genuine. Future work to make the whole border inspection process more effective, joined up and intelligence led has room for PTS issues to be involved.

2.13 ■ advised that the RSPCA had experience of good partnership working with Border Force at Holyhead and that it may be able to assist with training staff to help increase its skill set to deliver any illegal dog and puppy trade work. However, there was a question surrounding how to fund the accommodation costs for any increase in seized animal numbers that may result from any increased targeting.

The Dogs Trust

2.14 ■ outlined that the Dogs Trust would like more robust and effective border controls. The difficulty in vets contacting local authorities outside of office hours was also an important issue that Dogs Trust would like addressed. The Dogs Trust felt there was an opportunity for more intelligence-led activity (i.e. targeting high-risk people or consignments), that inspections could be strengthened to include physical checks of animals post-Balai importation (rather than documentary-based checks), and that more stringent penalties could act as an effective deterrent to criminal activity.

The RSPCA

2.15 ■ highlighted that the RSCPA was also concerned that it was not able to contact local authorities outside of normal office hours. Temporarily re-homing seized animals also incurred its costs, which could potentially increase with any increase in targeted enforcement activity. It was also anxious that where non-compliant animals are discovered these may be re-exported to save local authority costs. This could potentially lead to negative health and welfare consequences.

2.16 ■ suggested that clearer guidance was needed for local authorities on what steps they should take when an illegal movement is reported to them. This detail is missing from the NCMPAO guidance. The RSPCA has also picked up evidence that local authorities are receiving conflicting advice from APHA about when to put an animal into quarantine.

Action 2: ■ to draft a short information note describing the options available to local authorities upon being notified of an illegal dog/puppy landing.

Action 3: Defra to liaise with Scottish Government to determine if content of ■ information note could be included in revised NCMPAO guidance.

2.17 The RSPCA was happy to support joint investigations and pursue prosecutions, where this would be helpful. The recent joint RSCPA and Trading Standards case in Yorkshire Court was highlighted as a success. It was suggested that this experience could be assessed to understand what went well and why, so as to generate ideas for

developing future model “ways of working” that could then be replicated elsewhere. [REDACTED] advised that APHA and the Dogs Trust had an embryonic agreement in the South East of England whereby the Trust was willing to house seized dogs and puppies to safeguard their welfare.

2.18 [REDACTED] stated that APHA would welcome an exchange with the Dogs Trust and RSPCA to discuss production of a template for reporting of suspected PTS or Balai Directive movement irregularities. A standard format would enable an objective assessment of the importance and relevance of information provided to be made.

Action 4: APHA to arrange a meeting with Dogs Trust and RSPCA to discuss reporting of suspected Pet Travel or Balai movement irregularities

3.0 Note of CVO meeting held on 3 August 2015 – Paper IMDP 1-3

3.1 The meeting note and actions were agreed. Progress is shown in the table below.

No.	Action	Owner	Progress / Comments
1-1	Centre for International Trade to identify information available on individuals, vehicles and consignments to inform targeted investigations for both pet travel and Balai movements.	[REDACTED] [REDACTED]	Open [REDACTED] to report back to group.
1-2	Dogs Trust agreed that it could offer assistance (e.g. quarantine costs) for costs arising from targeted initiatives, such as Operation Bloodhound.	Dogs Trust	Closed [REDACTED] confirmed this position still held.
1-3	[REDACTED] will take responsibility that intelligence and data supplied from outside organisations is acted on, where appropriate.	APHA	Open [REDACTED] will circulate paper on APHA roles and responsibilities to group which will indicate that [REDACTED] will, in future, lead this area for APHA.
1-4	Defra CVO will provide evidence to CVOs in other Member States where illegalities to exploit the pet travel scheme or Balai movements have been identified.	Defra	Closed To form part of normal business as usual activity and reporting to group.
1-5	APHA will lead on improving planning for incidents where illegalities are suspected or identified, including providing assistance to Local Authorities.	APHA	Closed To form part of normal business as usual activity and reporting to group. [REDACTED] to lead.

1-6	Dogs Trust would continue to provide training on evidence gathering and Police and Criminal Evidence requirements for Local Authorities.	Dogs Trust	<p>Closed</p> <p>■ confirmed this position still held. To form part of normal business as usual activity and reporting to group.</p> <p>■ suggested this training be extended to Police Officers.</p>
1-7	Look at additional Pets Order sanctions that could be used to support enforcement as part of the Post Implementation Review of the pet travel scheme.	Defra Imports and EU Trade team	<p>Open</p> <p>Defra to continue to explore. Post Implementation Reviews of PTS Regulation 576/2013 and TARP 2011 provide an opportunity identify if domestic legislation meets requirements.</p> <p>PTS and Balai Directive provisions will be brigaded in new EU Animal Health Law legislation currently under discussion.</p>
1-8	APHA to identify, on a port by port basis, how enforcement is carried out and resources (e.g. out of hours veterinary support, quarantine facilities) that are available.	APHA	<p>Open</p> <p>■ requested what information was sought to address this action</p>
1-9	To review Defra guidance to Local Authorities on legislative action and provide feedback to the Defra Imports and EU Trade team.	RSPCA	<p>Open</p> <p>RSCPA are still considering comments on this guidance.</p> <p>■ offered to share Scottish Government contact with ■ for the RSPCA to feedback directly.</p>
1-10	To liaise with Ministry of Justice colleagues to identify sanctions available and sentencing guidelines when cases of illegally landed dogs are brought to court.	Defra Imports and EU Trade team	<p>Open</p> <p>Defra have begun looking for appropriate sentencing guidelines already in existence that could be used by Courts as a baseline reference.</p>
1-11	Defra will convene a workshop in December 2015 with the aim of identifying and reviewing a range of potential mechanisms to address	Defra Imports and EU	<p>Open</p> <p>See discussion at point 6.</p>

	the known problems.	Trade team	
1-12	Initiate quarterly stock take meetings with stakeholders to review activity and identify related results with the first being October 2015.	Defra Imports and EU Trade team	Closed To form part of group's normal business as usual activity.

Action 5: [redacted] to share Scottish Government contact with [redacted] to enable the RSPCA to feedback its comments on current NCMPAO guidance direct to those undertaking the review.

4.0 Paper IMDP 1-3a: Review of actions transferred from Defra's Rabies Core Group

4.1 All agreed these actions should be taken on by the new CVO convened group.

5.0 Terms of reference

5.1 Following brief discussion it was agreed that Defra would draft a terms of reference (ToR) for the group and circulate for comments.

Action 6: Defra to draft and circulate ToR for group.

5.2 Membership of the group was discussed. [redacted] advised [redacted] could use [redacted] position to feedback news/advance issues via the Dogs Trust and the veterinary profession network contacts ([redacted] will consult with the British Veterinary Association and British Small Animal Veterinary Association to check that they are content with this approach). [redacted] will similarly feedback news and advance issues via [redacted] presence on the Local Authority National Panel.

6.0 Workshop: Illegal movement of dogs and puppies

6.1 It was agreed that this would need careful planning, preparation and facilitation if it is to be effective and yield useful outputs that it should take place as practicable in 2016. The format and objectives of a previous workshop held in 2013 should be reviewed to help inform its content. A recent local authorities workshop led by City of London could also inform the agenda.

6.2 Further discussion on the content of the workshop will be required, but early ideas proposed included addressing:

- Roles and responsibilities
- What are the key issues for individual stakeholders?
- Intelligence and data
- Activity at the border
- Issues inland

- Sanctions
- Local authority out of office hours contact
- Where costs associated with operation and enforcement falling. Does this driving unintended behaviour?
- Options for moving forward
- Would a veterinary questionnaire and pet owner survey be useful?

6.3 The Dogs Trust reported it finds it difficult to influence buying behaviour which is often emotionally driven and would like stronger controls on the selling and advertising of dogs and puppies. ■■ suggested that online advertisers could be invited to the workshop, so as to increase their awareness of trade non-compliance issues.

Action 7: ■■ to share agenda from 2013 workshop with group to stimulate thought.

Action 8: Defra to coordinate the planning, design and scope of the proposed workshop with group members.

7.0 Date of next meeting

7.1 Defra will canvas for dates.

**Imports and EU Trade
Defra**

Illegal Movement of Dogs and Puppies meeting

16 January 2016 - 13:30 – 16:00

Room G22, Nobel House, Smith Square, London SW1P 3JR

Summary Note

Attendees

<u>Dogs Trust</u>	██████████ ██████████	Veterinary Director Director of Communications
<u>RSPCA</u>	██████████	Government Relations Manager
<u>Defra</u>	██████████ ██████████ ██████████ ██████████	Imports and EU Trade Pet Travel Scheme Policy Pet Travel Scheme Policy Imports and EU Trade
<u>APHA</u>	██████████ ██████████ ██████████	Head of International Trade Field Services Team Leader (Dover) Animal Health Officer (South East)
Apologies	██████████ ██████████	National Animal Health & Welfare Panel and City of London Corporation RSPCA

1.0 Introduction

1.1 ██████ thanked all for attending the second stakeholder group meeting on the illegal movements of dogs and puppies.

2.0 Update on recent developments and activity

2.1 ██████ reported that since the group last met there had been high level discussion within Defra on the issues surrounding the illegal movement of dogs and puppies. Minister Eustice (Minister of State for Farming, Food and the Marine Environment) has confirmed his commitment to making this a priority work area. ██████ (new Defra Animal Health and Welfare Director) has also met with the Chief Veterinary Officer and, as a consequence, Defra and APHA officials have been commissioned to prepare a strategic overview of EU pet travel scheme (PTS) system and its abuse. This will highlight an estimation of the scale of problem, identify points where knowledge gaps exist

and present options and (measurable) recommendations for Ministerial consideration.

Defra is also preparing for a Statutory Review of the Non-Commercial Movement of Pet Animals Order (NCMPAO) 2011. A public consultation will occur as part of this process, enabling stakeholders to submit evidence on efficacy of the domestic legislation in implementing PTS requirements.

2.2 ■ reported that APHA had recently begun a pilot at the port of Dover. This intelligence led approach is focussed on detecting, and acting on, PTS infringements. The local APHA team is gathering intelligence and is liaising with Border Force and Port of Dover Police to target suspect importers and their vehicles. The pilot will continue over coming months and should generate valuable data on PTS abuses that could help inform future policy decision-making. ■ expressed APHA's thanks to the Dogs Trust for its help in funding the quarantine costs of any dogs and puppies that are seized during the pilot.

■ reported that 61 animals had been seized in the last ten days, from 14 different transporters, under various welfare and PTS offences. Eurotunnel officials are well engaged and APHA is working towards a similar agreement on sharing passenger data with P&O.

In discussion it was agreed private vets have a key role in: raising awareness of PTS requirements; giving best practice advice to clients considering buying a puppy; and in capturing and passing on intelligence data. ■ advised that many vets are frustrated at the varying responses given by local Trading Standards teams to their reports of suspected illegal landings. ■ offered to cascade any appropriate Defra/APHA messaging to vets at the forthcoming (April) Small Animal Practitioners Conference.

■ also explained that APHA was considering changing the post-import checking regime for commercial pet movements so that it is more targeted and focused towards consignments of higher risk. This is complicated as importers are now often using one Intra-EU Trade Animal Health Certificate (ITAHC) per dog which makes building a profile of compliance for an individual organisation problematic.

2.3 ■ referred to the encouraging signs coming from the Dover pilot. Over 100 puppies had been licenced into quarantine since December. However, the Dogs Trust expressed concern about the future of these arrangements when its contract to support quarantine spaces ended. ■ confirmed that the pilot was only possible because of the Dogs Trust support. Neither APHA or local authorities could fund a large number of quarantine places. The priority is to

use the pilot to gather as much data as possible on the nature of illegal movements and the reaction of importers to targeted enforcement.

■ confirmed that during the pilot, the Dogs Trust would be engaging with local media to communicate updates with an educational emphasis. It will also likely produce an evaluation report at the end of the pilot. ■ asked if the Dogs Trust could share information on the quarantine costs it incurs.

Action 1: Dogs Trust to provide IMDP group with an assessment of the costs it incurs during the Dover pilot.

■ asked if Dover Police had powers to seize the vehicles for PTS or Balai Directive infringements. ■ advised that, in ■ opinion, enforcement bodies did not have such powers and the Ministry of Justice would require a strong evidence to support such a recommendation. Additionally such action may not actually penalise offenders, who may using hired vans.

- 2.4 ■ reported that the RSPCA is carrying out ongoing work to try to quantify costs of the illegal dog/puppy trade. ■ agreed that metrics on the costs to different organisations, such as charities, local authorities, etc. would be valuable data for demonstrating the scale of the problem to others.

The RSPCA has also begun feeding in intelligence to APHA – was this in a helpful format? ■ advised that ■ had not seen this (the Carlisle Imports Team had not received anything recently), but explained that the more detail included, the better, as this enables APHA to process reports efficiently. For example, registration numbers, times of movement, what offences were believed to be taking place could help target specific action. The role of intelligence gathering/submission would be covered at the March workshop, using APHA’s experience of working with World Horse Welfare.

3.0 Workshop on Illegal movement of dogs and puppies

- 3.1 ■ confirmed that the workshop will be held on 22 March at 110 Rochester Row, Victoria, SW1P 1JP. ■ thanked the Dogs Trust for offering a venue, but due to difficulties in key attendees getting to this location, a venue in London was favoured. There is currently capacity for 35 delegates, but this can be increased, if needed. ■ said that the Dogs Trust ran a similar meeting a few years ago and that it was advantageous to have an independent facilitator. It was agreed the workshop of 22 March would make use of independent facilitators who would be identified by the Dog Trust.
- 3.2 There was discussion on the objectives and structure of the proposed workshop and how best this should be focused to gain the most from the day

(further detail outlined in paper IMDP 2-2). Scene setting was considered to be important and the meeting needed to be of sufficient length to cover all necessary ground to get maximum benefit.

3.3 It was agreed that the workshop should be used to:

- Ask interested parties what the main issues are, from their perspectives, and then group these into common themes
- Identify and agree what, within these themes, can be done in the short, medium and longer term to improve rates of compliance
- Determine who is going to do what and by when

3.4 ■ emphasised that the facilitator should be given a good brief beforehand so that they are clear about the issues and what we are collectively trying to achieve.

Action 2: ■ to identify a facilitator for the workshop and arrange a joint meeting with ■

3.5 It was suggested that representatives from the following be invited

NGOs – Dogs Trust, RSPCA (England and Wales), SSPCA, Kennel Club, Four Paws (from a welfare perspective); British Veterinary Association, BSAVA; Pet Advertising Advisory Group, Online advertisers (to represent trade)

Approved carriers – P&O Cruises (shipping), Eurotunnel (rail)

Chair of National Animal Health and Welfare Board – ■■■■■

National Companion Animal Welfare Group

Quarantine business – ■■■■■?

Enforcement – National Local Authorities Panel (■■■■■), Border force (Intelligence Team), Police (■■■■■), Port of Dover Police?

Devolved Administrations – Defra to invite, including Northern Ireland

EU Commission

■ asked if they should invite the Defra Minister responsible for pet travel. ■ advised this should be an RSPCA and Dogs Trust decision.

Action 3: All to send relevant contacts to ■.

4.0 Note and actions from 3 November 2015 meeting

4.1 Agreed. Progress is shown in **Annex 1**.

5.0 Terms of Reference

5.1 ■ briefly presented a suggested draft Terms of Reference for the group. It was agreed that if the group encountered problems it could not solve, then these could be escalated to CVO to consider, as necessary.

5.2 It was also noted that cats should not be forgotten (some rare breeds can be valued at £1,000 per animal), though abuse of the PTS was not believed to be occurring at a high level. It would be hard to prove their illegal movement, but APHA would take the same regulatory approach to them as dogs and puppies, where there was sufficient evidence of non-compliance.

Action 4: All group members to review Terms of Reference for sign-off at next meeting.

Action 5: ■ to determine precise attendees and numbers to invite to 22 March workshop and send out invitations.

Illegal Movement of Dogs and Puppies: Action Point Summary and Progress

Agenda Item 4 (Minutes and actions)

No.	Action	Owner	Progress/Comments
1.7	Look at additional Pets Order sanctions that could be used to support enforcements as part of the post Implementation Review of the pet travel scheme	Defra Imports and EU Trade team	Agreed to transfer this issue to the Post Implementation review of TARP and Pet Travel Regulation Statutory Instruments Defra to share a timeline, when available
1.10	To Liaise with Ministry of Justice colleagues to identify sanctions guidelines when cases of illegally landed dogs are brought to court	Defra Imports and EU Trade team	Agreed to transfer this issue to the Post Implementation review of TARP and Pet Travel Regulation Statutory Instruments
2.1	APHA to circulate draft roles and responsibilities paper	APHA	Open
2.2	Draft a short note describing options available to local authorities notified of an illegally imported dog	██████████	Closed
2.3	Liaise with Scottish Government to determine if ██████████ information (2-2) could be included in NCMoPAO guidance	Defra Imports and EU Trade team	Open
2.5	██████████ to share Scottish Government contacts with RSPCA	██████████	Open
3.1	Dogs Trust to provide IMDP group with an assessment of the costs it incurs during the Dover	Dogs Trust	Open

	pilot.		
3.2	Dogs Trust to provide a facilitator for the Illegal movements of dogs and puppies workshop on 22 March 2015	██████████	Closed <u>Update:</u> Facilitator approached and joint briefing meeting held
3.3	Dogs Trust, RSPCA and others to send relevant contact details to █████ for inviting to the workshop	All	Open
3.4	Review Terms of Reference for the Stakeholder group for sign-off at next group meeting	All	Open
3.5	Determine precise attendees/numbers and send out invitations for 22 March workshop	██████████	Open

The illegal movement of dogs and puppies - what can be done?

A workshop organised by Dogs Trust and the Department of Environment, Food and Rural Affairs

22 March 2016

Key issues

1. Working together, improving data and sharing intelligence

Problem

- There is a lack of coherent or centrally collated data which prevents stakeholders working together effectively.
- Stakeholders are not sharing key data which means that smugglers are not being caught.
- There is confusion between data and intelligence and where each fits in.
- No one person or body is responsible for collating data and this needs to be rectified.

Solution

- There is a desire for there to be a centrally funded system for data - this could be something that the charities fund.
- Intelligence is more sensitive than data and should be handled with care, but it can ultimately be used to inform enforcement agencies.
- Data should be shared between vets, charities, and carriers, and will greatly help the issue of smuggling.
- Clarification is required about what data is required and for whom

2. Educating consumers and understanding demand

Problem

- The purchase of puppies is nearly always a completely emotional decision by the consumer.
- There is a need to understand in depth why consumers make the choice to buy a puppy when they do not know its background, or suspect it is illicitly available.

Solution

- A joint campaign from recognised organisations such as Dogs Trust and the RSPCA could help raise awareness but it should be recognised a full behaviour change programme would require a significant cost and time commitment
- The trade needs to be exposed - consumers are currently unaware that it is a fully organised, money-making crime network.
- Shock tactics could be used in helping people understand and make the correct choices - campaigns or advertising similar to drink/drug driving would be effective with the caveat that these successful behaviour change campaigns have had substantial Government funding over a long period of time
- Accredited safe sites where people can buy puppies in the knowledge they are not smuggled should be considered. Perhaps create a puppy hotline - where consumers can go for advice on buying a puppy.

3. Tackling supply and understanding the criminal networks

Problem

- Collaboration is the most important aspect of tackling crime networks and is currently ineffective.

- Smugglers are organised and several steps ahead of border control and law enforcement.
- Opportunists are moving to puppy smuggling from other activities like that of illegal cigarette smuggling and we still do not know how the criminal networks operate.
- Trade from Ireland for the UK market is a specific issue.
- Puppy smuggling is an economic, market driven trade and a money making enterprise valued at £100+ million.

Solution

- Forming an EU wide working group on puppy smuggling should be considered, as should formulating a consumer campaign that is Europe-wide.
- Discussion could be had with EU Dog & Cat Alliance about opportunities to develop this within their existing framework

4. EU and UK legislation and enforcement

Problem

- Legislation exists to secure the health of animals and humans. It also exists to allow people to be able to pursue their commercial interests within the European Union.
- EU legislation to protect animal welfare is very limited and so puppies can travel for hundreds of miles across borders.
- The disease picture in Europe is not harmonised. The UK is lucky that it doesn't have tapeworm or rabies - that is sadly not the case in much of Europe. Other diseases of concern are not covered by the EU legislation.
- Legislation is hard to enforce across Europe.
- There is a legislative difference between commercial and non-commercial pets, with lots of loopholes which are exploited by smugglers.
- There is an issue over the ownership of pets - pets can travel separately from their owners and still technically be their pet, for example.

Solution

- Traceability is an issue - once an animal enters the country it can be very hard to find. Reversing the burden of proof would make it much easier to prosecute people. More checks at the border would also work, but this goes against the EU's free movement policy/argument.
- Giving powers to enforce legislation across multiple agencies would improve prosecution rates.
- Vets should have a legal duty to report on non-compliant animals.
- The current legislation on pet movement will be repealed and replaced by a new EU 'Animal Health Law' which comes into force in 2021. This provides a critical opportunity for Defra to work to improve the EU legislation, especially under the UK's Presidency of the Council of the EU in 2017.

5. The spread of disease

Problem

- The illegal trade in dogs and puppies brings many risks including diseases such as tapeworm and rabies.
- Illegal puppies are rarely properly vaccinated before they arrive in the UK and place great burden on British vets when they arrive.
- The disease associated with pet travel and the potential harm this could do to humans and other animals is not fully understood by the consumers buying the puppies.
- The UK is lucky to not have prolific tapeworm or rabies but should not rest on its laurels when it comes to identifying and treating such diseases in smuggled puppies.

Solution

- UK vets need to be better briefed on data from other organisations to fully understand the extent of the disease carrying illegal puppies and how to treat them appropriately.

6. The welfare of puppies

Problem

- The welfare of puppies is everyone's primary concern.
- Bad vets issuing fake passports and documents seriously undermine the health and wellbeing of these animals and should be traced and stopped.
- There are insufficient resources across all stakeholder groups to protect the welfare of puppies that are being smuggled, both during and after their journeys to the UK.

Solution

- Better enforcement in the UK to prosecute smugglers and breakdown crime networks would help tackle the issue and protect the welfare of puppies.

7. Working with transport carriers

Problem

- Carriers have typically been difficult to engage with on this issue.
- All carriers worry about their commercial advantage and this will ultimately play a role in whether or not they collaborate.

Solution

- Carriers, vets and charities should share intelligence with the policy regulator.
- Carriers should ban those people smuggling puppies. All carriers should take the line Stena has done, and send back smugglers to where they came from free of charge.
- Around 60% of trade comes from Eurotunnel, so their check in staff should be more alert, and this should be fairly simple to implement.
- There is a reputation issue for carriers if they fail to tackle the issue - that could form part of communications.

Full write up from the workshop

Welcome from the Chief Veterinary Officer

- Welcome and thank you all very much for attending this important meeting today.
- The illegal trade of dogs and puppies brings many risks including disease such as tapeworm and rabies.
- This is not our primary concern though - our main concern is the welfare of puppies.
- Lots of different parties have to pick up the pieces from the illegal trade of puppies. Vets have to deal with the owners of these puppies who end up having problems, and deliver the difficult messages to owners associated with this. Enforcement bodies have to deal with it at the border and beyond.
- There are lots of challenges - everyone has constrained resource. There is more we can do but resource is not unlimited.
- We need to understand who drives this trade - why, and where from?
- We need to drive down the source and demand for this puppies - and understand at every step how to tackle it.

Introductory presentations: organisational priorities and views

Dogs Trust

- Lack of vaccination against both every day and less common diseases
- 'Bad vets' issuing fake passports and documents
- Insufficient resources to deal with the problem
- Educating consumers on how to buy a puppy correctly
- The advertising of illegal puppies and lack of legislation surrounding this
- The illegal landing of puppies is not always reported
- Disease associated with pet travel and the potential harm this could do to humans and other animals
- Taking action against those involved

Local authorities

- Dealing with non-compliant puppies
- Training around the appropriate age of puppies
- Getting buy-in from EU member states to tackle the issue in a holistic way
- The 1965 act
- Domestic legislation is not fit for purpose

Transport carriers

- Sheer number of illegal puppies - one in every tenth car
- Widespread and organised criminal network and activity
- Animal welfare is the primary concern

- Collaboration between agencies is better than it has ever been
- However, leads are not always followed up
- The number of people travelling with pets is increasing

RSCPA

- There are still huge unknowns in how the criminal networks operate
- Where the illegal imports come from is of primary concern
- Trade from Ireland for the UK market is a specific issue
- This is an economic, market driven trade and a money making enterprise valued at 100 million+

APHA

- The scale of movement has increased
- The traditional methods of tackling puppy smuggling are no longer working
- Key data has been missing up until now
- Non-compliance is to do with desire for young puppies
- Opportunists are moving to puppy smuggling from other trades like that of illegal cigarette smuggling
- APHA has lots of data - but needs help bringing it together into something more meaningful
- Educating the public is a key aspect of eventually tackling the issue

Working groups

Group one: Working together - improving data sharing and building partnerships to build fruitful interventions

- Two main types of data - sea ports and inland.
- Sea data - we need specific intelligence on the times vehicles carrying illegal puppies arrive at ports and borders. This data exists in some forms already, but there is no single point of contact for it, nobody is analysing it properly, not enough people are sharing or collating in the data properly.
- Systems across organisations should link up.
- It is essential we link together people from different organisations so the jigsaw can fit together properly. Perhaps a virtual or regular meeting would be beneficial?
- How do we fund someone to analyse the data? Where should this money come from? Ideally, we should trial funding for six months to a year first.
- The charities should think about fronting this.
- Inland data - there are a lot of unanswered questions. Who is working on this? Where are the animals being picked up from? What is actually happening on the ground?
- It is a postcode lottery in terms of how effectively it is dealt with. Does trading standards have an analyst looking at this?
- Inland data is a much bigger, unresolved issue than sea data.

Group five - *same topic as above*: Working together - improving data sharing and building partnerships to build fruitful interventions

- Where does data fit in, where does intelligence fit in, and who is responsible for both these things?
- Carriers, vets and charities should share intelligence with the policy regulator.
- Charities should also feed into the enforcers, and enforcers into charities. HMRC would also come under the banner of enforcer - this fits nicely because of the fraud element.
- Intelligence should be used for enforcement, and data for charities and vets etc. to share amongst themselves.

- Data is easier to share than intelligence, because intelligence can be sensitive information. Data could be used for education purposes, to provide evidence for change and also to inform vets dealing with this issue.
- We need a centralised hub to analyse data. Could the charities provide this? Resource is undoubtedly an issue so we would need to manage expectations.
- We need to understand what each stakeholder needs in terms of data/intelligence, and what access they require.
- At the moment data is anecdotal and doesn't drive forward activity. It needs to be more of a collaboration. We need to make sure we use data sensibly and carefully and it needs to be handled correctly and sensitively.

Group two: Dealing with demand, education and consumers, and making the right choices

- There are barriers when dealing with the demand for illegal puppies because messaging and advice is conflicting.
- The purchase of these puppies is nearly always a completely emotional one by the consumer.
- What are the solutions to tackle this? A joint campaign from a recognised body - the Dogs Trust, RSPCA and BDA are best place to lead on this - would be good in getting an effective, joined up message out there. At the moment, all of us are sending out different messaging.
- To deal with the emotional aspect of the purchase we must expose the trade itself. We must get rid of the notion that we are saving these animals and come up with a campaign that presents the villain behind the trade and really shows it as organised crime that consumers are supporting.
- Shock tactics could be used in helping people understand and make the correct choices, as well as raising public awareness around the entire trade.
- The internet is impossible to police, which is another issue. Having the support of internet search companies like Google would be good to combat this.
- We must get in to consumers' heads and really understand what makes them buy these puppies under such circumstances.
- Social media could be used to create a campaign and make it go viral - perhaps creating 'fake ads' which when clicked on make a shocking picture of an illegal puppy in a bad state appear. Shock tactics along the line of the drink/drug driving campaigns used by Government.
- We can harness the support of our existing campaigners but also reach new people - those angered by the tax avoidance associated with puppy smuggling, or the spread of disease, for example. The Daily Mail may want to spearhead this.
- We should look at doing an awareness campaign with Eurotunnel. Can we get carriers to ban people who illegally smuggle puppies, and publicise the cause?
- We should also look at creating accredited safe sites where people can buy puppies in the knowledge they are not smuggled. Perhaps create a puppy hotline - where consumers can go for advice on buying a puppy.
- We could film seizures down in Dover and show people to shock them and make them see the full journey these puppies undergo.
- A concern is that the cost of doing such a campaign would be very high.

Group three - tackling the supply side and improving corporation enforcement in EU countries

- Collaboration is the most important thing. Intelligence sharing is the most burning issue, as well as how we share intelligence across the EU. How do we harmonise the many different types of breeding legislation across the EU?
- We should consider forming an EU wide working group on puppy smuggling, and formulate a campaign that is Europe-wide. We should also look at holding an EU conference - there is clearly already interest around this. Should passports only be issued by vets, for example? Should we raise the minimum import age to six months?
- France needs to play more of an active role in checking transport coming over from other countries as they do not do this currently.

- However, the French system does have some benefits - for example, they register all sellers. Having a seller database which HMRC and the public could access here in the UK would be useful.
- We should also consider: legislation to stop selling puppies on places like Facebook, fixed on the spot penalties for smuggling rather than going to court, having vets on call at ports to identify the age of puppies, and multi-language poster campaigns at ports and the Eurotunnel.

Group four: Consider the EU and UK legislation and if it is fit for purpose, and how it can be improved.

- EU legislation is more relevant under this title than UK legislation.
- Legislation exists to secure the health of animals and humans. It also exists to facilitate people to be able to pursue their commercial interests within the Union.
- EU legislation to protect animal welfare is very limited and so puppies can travel for hundreds of miles across borders.
- The disease picture in Europe is not harmonised. We are very lucky in the UK that we don't have tapeworm or rabies - that is sadly not the case in much of Europe.
- Legislation is hard to enforce across Europe.
- There is a legislative difference between commercial and non-commercial pets, with lots of loopholes.
- There is an issue over the ownership of pets - pets can travel separately from their owners and still technically be their pet, for example.
- Traceability is an issue - once an animal enters the country it can be very hard to find. But all of the above can be improved.
- Reversing the burden of proof would make it much easier to prosecute people. More checks at the border would also work, but this goes against the EU's free movement policy/argument.
- Giving powers to enforce legislation across multiple agencies would improve prosecution rates.
- Vets should have a legal duty to report on non-compliant animals.
- We should increase penalties for non-compliance, and look at financial legislation to improve compliance as well.
- How can we coerce travel partners to do more? Around 60% of trade comes from Eurotunnel, so their check-in staff should be more alert, and this should be fairly simple to implement. Stena, for example, have been very coercive and will return someone back to where they came from for free if they are caught bringing in illegal puppies.
- All carriers worry about their commercial advantage and this will ultimately play a role in whether or not they are collaborative.
- We also need to tackle the dog dealers - the middle man picking up the dogs and physically selling them, as often that is not the smugglers themselves.
- How reliable is the test for assessing 12 week old puppies at the border - the Menace Reflex. Is this worth a research project?

Closing comments

- Sharing intelligence is absolutely key and is the first step forward in tackling this issue.
- We have made good progress and must keep momentum up.
- Undeclared smugglers are and always will be an issue. Efforts being made at the border are having an impact but more can be done.

FIFTH MEETING OF GB EXOTIC DISEASE CORE GROUP FOR RABIES

27 April 2016. 11:00 – 13:00. Conference Room E, Nobel House, London.

Attendees:

██████████ (Telecon)	██████████	Defra (Chair)
██████████	██████████	Defra
██████████	██████████	Defra
██████████	██████████	APHA
██████████	██████████	APHA VENDU
██████████	██████████	Welsh Government (Telecon)
██████████	██████████	Welsh Government (Telecon)
██████████ (Telecon)	██████████	Welsh Government (Telecon)
	██████████	Scottish Government (Telecon)
	██████████	Scottish Government (Telecon)

Apologies:

██████████

Agenda:**1. Welcome and introductions.**

- ██████████
██████████ and ██████████
██████████ were introduced as the new Welsh Government officials replacing ██████████ and ██████████. ██████████ from APHA Weybridge was introduced as an observer.

2. Outstanding actions from last meeting.

- Note of fourth meeting agreed. Action 5:1 – secretariat to circulate finalised minutes.
- Update on action 4.2 – ██████████ to speak to ██████████ offline in relation to outstanding bat rabies questions. Action 5:2 – ██████████ to discuss with ██████████.

3. Presentation and discussion: EBLV in bats: what are the risks and how do we manage them? – ██████████

- ██████████ gave a presentation about the work of the Bat Conservation Trust and risk related issues in dealing with bat-related incidents e.g. illegal landings. ██████████ talked about EBLV2 in GB and gave details of the 12 confirmed cases. ██████████ also provided details of BCT's input into APHA's active and passive surveillance schemes.
- ██████████ highlighted issues with post exposure treatment for those involved in bat biting incidents. ██████████ emphasised the importance BCT gives to observing good biosecurity when handling bats.

4. Communications during a rabies outbreak – ██████████

- ██████████ asked ██████████ and ██████████ to highlight key issues raised in their responses to the communications related questions set at the October meeting. A common theme was the importance of having pre-prepared information readily available to facilitate swift responses to media enquiries and information for promulgation to stakeholders.
- ██████████ explained how exotic disease policy teams have a range of preparedness products drawn up for use in an outbreak scenario. One of the principal documents is referred to as the Key Brief. This contains factual information about the disease (Static Brief) as well as key communications messages. The template for this document was put together in conjunction with Defra Comms who use it as their reference document for responding to media enquiries. The comms lines would be also be shared with

stakeholder groups, via the relevant disease core group, to ensure consistency in messages.

- The Rabies Policy Team has put together a Key Brief for rabies and a Static Brief (RCG 5B) and Key Lines (RCG 5C) which were presented to the group for comment. The group made a number of suggestions for the Key Lines document. As the Static Brief is a more in-depth document, the group was asked to submit suggested changes offline. Action 5:3 – group to submit comments on the Static Brief by 31 May.

5. EU Animal Health Regulation – [REDACTED]

- [REDACTED] gave a presentation providing the group with an overview of the work completed so far and what is to come to draw up the new EU Animal Health Regulation. In respect of rabies, [REDACTED] explained how the new Regulation categorises diseases and our current expectations for rabies in this respect. The group noted the use of ‘rabies’ in a generic sense and expressed concern with the lack of reference to EBLV, specifically, particularly in respect of the difference in official notification requirements.
- [REDACTED] stated that we would not wish for rabies controls to be harmonised with those set down for other exotic diseases in the new Regulation. This would result in the loss of the flexibility currently afforded by our national legislation e.g. bespoke size and shape of zones rather than the standard 3/10 km circular zones. Accepting that the current controls under national legislation remain untried, [REDACTED] posed a number of questions on their potential effectiveness in dealing with an outbreak. Action 5:3 – group to respond to questions by 31 May.
- [REDACTED] added that we will continue to monitor developments in Europe and will keep the group informed as required. Action 5:4 – secretariat to update group of EU AHR developments (ongoing).

6. Review and forward work programme – [REDACTED].

- [REDACTED] gave a short presentation reviewing the work of the group and asked the group for their views on progress so far and how the group should be taken forward. The group made a number of suggestions on meeting composition and were asked to consider subjects for future discussion. Action 5:5 – group to submit suggestions for future work priorities by 31 May.
- [REDACTED] stated our intention to revise and update the current Rabies Control Strategy to create a new GB-wide document and role envisaged for the group in this process. This will form part of the group’s work this year and may require one or more dedicated meetings to discuss.

Illegal Movement of Dogs and Puppies meeting
20 May 2016 – 11:00 – 13:30
Room 403, Nobel House, Smith Square, London SW1P 3JR

Summary Note

Attendees

<u>Dogs Trust</u>	██████████ ██████████	Veterinary Director Director of Communications
<u>RSPCA</u>	██████████	Head of public affairs
<u>NAHWBE</u>	██████████	National Animal Health & Welfare Panel and City of London Corporation
<u>Defra</u>	██████████ ██████████ ██████████	Imports and EU Trade Pet Travel Scheme Policy Pet Travel Scheme Policy
<u>APHA</u>	██████████) ██████████ ██████████ ██████████	– Head of International Trade Field Services Team Leader (Dover) Animal Health Officer (South East) International Trade Portal Lead

1. Recent activity

1.1 Defra

- A recent meeting between the CVO and Border Force (BF) managers has resulted in BF offering the opportunity for Defra/APHA to work with its Port Health Intelligence teams on illegal puppy movement issues – a positive outcome.
- Statutory post-implementation review of Non-Commercial Movement of Pet Animals Order (NCMPAO) 2011 will become an area of increasing focus over next few months. Stakeholder feedback (on how effective the Order has been in its implementation) will be welcomed.
- Pet travel policy team will receive some additional staff resource shortly. ██████████
██████████ Likely ██████ focus will be on operational, delivery and enforcement issues.
- ██████ are working to assess/refine post-import checks of pets, to strike a fairer balance between likely risk and benefit.

1.2 APHA

- Pilot has progressed well, generating lots of data to inform future options for policy and field delivery.

- [REDACTED] Regulatory Affairs team will recruit intelligence officers, who will work across APHA and with stakeholders to develop options for more effective gathering and use of intelligence data.
- HMRC visited Carlisle International Trade Team recently. It is very interested in anyone importing 30+ animals into the UK per year, from a possible tax evasion perspective – this could be a positive avenue to explore.

1.3 Dogs Trust

- Recent activity has focussed on preparing for the March CVO/stakeholder workshop and in supporting the Dover pilot.
- Dogs Trust (DT) visited Eurotunnel (ET) recently to see its operations. This highlighted reluctance by ET to share data on pet movements/owners beyond what it was legally required to do, due to commercial sensitivities.
- Pilot agreements for sharing data between parties are working well, but DT believes these are fragile, informal connections based on personal relationships. If pilot-type operations were to continue, a more formalised arrangement is required.
- Data exchange issues: two main systems for capturing movement data – MEMEX and RDB – do not “talk to each other”. [REDACTED] advised there is a piece of work happening to address this.

1.4 Local authorities

- City of London Corporation has seen virtually all referrals of non-compliant PTS puppies stop, saving it an estimated £10-15K (some un-microchipped dogs from Romania have been intercepted). Incidents of non-compliant animals have also decreased around the country, but not stopped.

1.5 RSPCA

- Has been active in supporting a recent prosecution case under the Animal Welfare Act and Fraud Act that under covered a sophisticated network of deception, e.g. using “false” mothers to deceive buyers that puppies were family pets.
- [REDACTED] described how the recent Panorama programme lifted the lid on highly organised dealer links to puppy farms in RoI. RSPCA suspect that illegal movements across the Channel is less organised, e.g. smaller numbers of animals moving, which are then put up for sale on the internet by numerous individuals.
- Routes of entry can change, e.g. Heysham became a hotspot last year.
- APHA is now providing helpful feedback on RSPCA intelligence reports.

2. Workshop outputs

2.1 Considering the main themes of the workshop write-up the following workstreams were identified:

2.2 Data, metrics and intelligence

- Realistically, how willing would organisations be towards increased sharing of “their” data? What limitations does the Data Protection Act impose?
- ■ – There is a need to match-up proactive and reactive data, e.g. Kent CC data on animal welfare/animal seizures is not passed to Kent Trading Standards if the animals are subsequently released (after meeting PTS criteria).
- Discussion identified a definite need for a piece of work across local authority, central government and animal welfare sectors to analyse what information and intelligence is being captured, what else could usefully be captured in future and what data can be shared? Such information would help us identify gaps and design the outputs that we need to generate to tackle the illegal puppy trade.

Action 1: ■ to talk to ■ about leading a workstream to pick up this work. ■ to also liaise with APHA to design clear aims and objectives, roles and responsibilities and timelines for this work

2.3 Demand and information: Educating consumers and influencing public demand

- This area requires long-term commitment; achieving positive changes in behaviour is often difficult to achieve. Pilot results and prosecutions could be effective at drawing attention to the hidden crime of puppy smuggling.
- DT is continuing talks with Gumtree and talking to the Pet Advertising Advisory Group (PAAG). It believes this is the best approach to tackle this work rather than through the IMDP group.
- ■ – This area has clear synergies with Defra’s recent consultation on the licensing of dog breeding. RSPCA would like to see all breeders being licensed and linked to end consumers in an open and transparent way. French do this and a recent snap-shot showed 95% compliance with legislation, plus consumers are more aware of licensing standards.
- Solving the issue of greater transparency in pet vending is important here (so should link to recommendations following Defra’s recent licensing of breeders consultation).
- ■ – DT can use its position on the EU Cat and Dog Alliance group to raise awareness of illegal puppy trade issues and gather intelligence.

Action 2: ■ offered to lead this workstream

2.4 Enforcement and deterrents

- DT sought legal advice about the concept of banning third party sales of pets – outcome was that this would be a disproportionate response to the problem.
- ■ – Vets are still finding it difficult to report suspected illegal puppy landings to Trading Standards out of office hours. Also picking up that owners are not reporting puppies they have purchased due to a fear that they will be confiscated (therefore could query do we have the right enforcement sanctions in place?).

- ■ – Kent CC shared recently how it needs to pick prosecution cases very selectively. ■ – RSPCA cases typically cost £35K.
- Non-UK nationals cannot easily be prosecuted unless they are detained overnight and charged the following day (as people may disappear).

Action 3: Defra will initially take this workstream forward

2.5 Legislation

- ■ – The development and implementation of the new EU Animal Health Regulation (which will eventually replace Pet Travel Regulation 576/2013 together with a host of other animal health legislation) is a three-year programme. This offers a real opportunity for introducing change, but Defra will have to prioritise which animal health issues it pursues in a selective manner. Negotiations on tertiary legislation offer an opportunity to build cross-EU Member State support for a call to change requirements of the PTS (this would need a concerted effort and be based on hard evidence).
- ■ – Veterinary Code now contains the right for vets to report any illegal activity relating to animals if they suspect the interest to animal welfare outweighs any personal confidentiality rights of the owner/keeper. However, there must be an adequate receiving facility in place to handle such reports.
- ■ – This workstream will aim to map out what options could be available for enforcement (existing and new) and assess which potentially form the most effective deterrents? Could fixed penalties and tax evasion provide fruitful avenues worth exploring? Defra’s PIR of the NCMPAO 2011 will provide an open space to collect views on this.

Action 4: Defra will lead this workstream

2.6 Compliance in other Member States

- The Dover Pilot may provide an opportunity for the Defra CVO to engage with some of his colleagues in other Member States on inaccuracies in pet passport documentation.

Action 5: Defra will lead this workstream

Action 6: DT to share data on welfare issues with seized puppies to enable Defra to obtain a broader perspective of other impacts/issues occurring (i.e. outside of typical underage and non-microchipping non-compliances)

2.7 Working with transport carriers

- APHA still need to establish a good contact at P&O – ■ will look into this.
- Dover pilot could provide valuable data to follow up movements with other key Member States. Germany and Austrians, for example, could also have names of regular carriers as these are often the first countries of entry for many dogs moving from Eastern Europe?

- ■ – can we connect with legitimate/conscientious carriers/traders to see if they can provide intelligence that they pick up during the course of their operations? ■ – APHA can supply its ‘Welfare in Transport’ email address, so that anyone with suspicions could report them.

2.8 Commercial movements

- Evidence exists showing that some rehoming charities are trading in rescue animals from other Member States under the PTS. There are around 45 importing “companies” to the UK.
- Issues include: Scams (where money is donated and no dogs are involved); Bringing in street dogs under PTS (i.e. commercially); or animal being moved (correctly) under the Balai Directive.
- The Association of Dog and Cat Owners in the UK is an umbrella organisation that could be utilised to reach these charities to drive up compliance, but perhaps it is unlikely that organisations of concern will be members?
- Street dogs of unknown provenance carry potential disease risk, e.g. *Babesia canis*, across boundaries. Also welfare issues as street dogs are often not accustomed to living indoors and cannot socialize with other pets due to their upbringing.
- Could we ask carriers to notify APHA of such movements (unlikely under DPA)?

Action 7: Defra will initially take this workstream forward

3. Dover pilot

- Has been very successful. Generated lots of data on who is importing animals, times of day, etc. Results tend to indicate a lot of IMDP movements are opportunistic?
- DT funding has been crucial to achieving this. Also, heavy reliance of APHA staff and private vets working outside of normal working hours.
- Member State break-down is very interesting – this could be further analysed to see if any trends have changed as the pilot progressed? We also don’t know if movements in undeclared animals increased.
- ~12 puppies were placed into quarantine in the 5 months preceding the pilot’s start. During the period December 2015 to April 2016 during the pilot, this was over 160 puppies.
- More Eurotunnel calls to begin with, but these are now balancing out with Port of Dover referrals (is this a significant change?).
- ■ – Typically 60 pet movements a day. This level of monitoring would not have been possible without effective engagement and support from stakeholders. APHA has taken time to thank them all and feedback how important their role has been.
- ■ – Confirmed that it would be very difficult to get the pilot’s momentum started again if it were stopped at the end of May.
- ■ – APHA are committed to carrying out a full (factual) review of the pilot upon its conclusion.

- ■ – Defra needs to report back to ministers explaining what the pilot has told us, what we've learnt and outline a range of policy options for the future.
- ■ – DT is concerned with the implications of it withdrawing funding now. This could be detrimental to benefits achieved so far. It has invested considerable time organising animal socialization programmes, work planning for its staff, etc. ■ – confirmed that DT would be open-minded to continuing to fund the pilot for a limited time but emphasized how it was costly and was not dealing with the "root of the problem". Defra confirmed that a slight extension would be very welcome and thanked the DT.

Action 8: DT will outline a formal proposal to Defra to extend its funding of the Dover pilot.

4. Minutes and actions of last meeting

- Minutes of the 16 February 2016 IMDP meeting were agreed.
- Actions 1.7 and 1.10 – transferred to Defra's PIR of the NCMPAO 2011
- Action 2.1 – ■ to draft paper in conjunction with ■, which will then be circulated to the group
- Action 2.3 – closed
- Action 2.5 - ?
- Action 3.1 – Yes, final costs + details of other costs will follow.
- Action 3.4 – Defra welcomes any comments (by correspondence) on draft Terms of Reference. A 'nil reply' will be taken as members being content with the draft.

5. Escalation routes

- ■ confirmed that the RSPCA should use APHA's Carlisle team for submitting information and requesting data on trade, movements, etc.

6. Date of next meeting

Action 6: Defra will schedule a suitable date in early September 2016

ILLEGAL IMPORTS OF DOGS AND PUPPIES

Illegal Movement of Dogs and Puppies

12 September 2016 1330 – 1600

Room 403, Nobel House, Smith Square, London SW1P 3JR

Note of Meeting

Attendees

Dogs Trust [REDACTED] Veterinary Director
[REDACTED] Senior Press Officer

RSPCA [REDACTED] Head of Public Affairs.

NAHWBE [REDACTED] National Animal Health and Welfare Panel
and City of London Corporation

Defra [REDACTED] Imports and EU Trade
[REDACTED] Pet Travel Scheme Policy
[REDACTED] Pet Travel Scheme Policy

APHA [REDACTED] Head of International Trade
[REDACTED] Field Services Team Leader (Dover)
[REDACTED] Animal Health Officer (South East)
[REDACTED] International Trade Portal Lead

1. Introduction and purpose of meeting.

- [REDACTED] -Background of Brexit, currently actively looking for stakeholder views. Currently we are part of EU and will remain so until fully disengaged. We are currently looking to the future and comments can help shape that future. PIR is in train and not linked to Brexit / desire to get comments to shape future. Consultation on PIR will be launched shortly.

Action:

- [REDACTED] to send CFSG Position Statement.

2. Note of meeting held on May 2016.

- No comments

3. Actions from meeting held May 2016

- Outstanding action regarding health issues at Dover Pilot
 - This is now considered built into the Dover Report. Action closed

4. Enforcement activity at the Port of Dover

- Introduction of CVOs thoughts on the need for a sustainable and effective enforcement approach.
- ■■■ problem won't go away. Need to carry on and look at other routes.
- Current work is based on personal relationships and good will, need to continue and build in more formal arrangements.
- ■■■ – RSPB looking at Pembroke and Hollyhead to run initiatives. Updated on operations in Scotland which have sent consignments back to Ireland. Dover enforcement doesn't seem to have affected Irish trade.
- Discussion on Local Authority resources. ■■■ – this is a national issue, highlighted that existing national programs such as Scam busters are centrally funded. Local Authorities do share / pool resources but would benefit from central funding.
- ■■■ - quarantine kennels often rehome successfully, and this helps reduce the Local Authorities' costs.
- ■■■ – need to seize puppies not just send them back, this risks welfare issues and they just come back another day.
- ■■■ – Dover activity seems to have slowed incidents of puppies being picked up. However in the last three weeks has seen an increase. Approximately 40,000pa spent in London on illegal puppies, but this a variable and unpredictable figure.
- ■■■ – Local Authorities have worked together to tackle horse issues by working together and pooling resources.
- ■■■ - question regarding capacity of quarantine if enforcement is improved (c200 places nationally). Each seized animal is place for between 21 days and 5/6 weeks depending on age of puppy seized. Quarantine kennels currently dependent on enforcement action to remain viable.
- ■■■ - current plans are for the APHA evaluation of the Dover Pilot to be sent to Ministers together with possible future options..

- ■ – pet vending consultation and associated action should help the illegal import situation.

Actions:

- ■ to take LA working together option to panel.
- ■ survey LA's to assess the annual costs of dealing with non-compliant dogs.

5. Work stream progress and future activity:

Data and Intelligence: ■, APHA have carried out an initial assessment of data held relating to the movement of dogs and work to scope out the intelligence and metrics needed to help understand the scale of the issue of illegal movement of dogs and steer future policy and enforcement.

- Two intelligence analysts now in post with APHA, their primary initial focus will be on illegal movement of dogs and puppies.
- ■ – Dogs Trust may be able to help with resources to help with intelligence work. ■ – RSPCA already have data sharing arrangements and are doing similar work with APHA on farm animals.
- Defra evidence colleagues have worked on an econometric model to assess the number of possible suspicious dogs travelling under PTS. Model is being QA'd internally.
- **Demand and information-** ■, educating consumers – presentation on change of behaviour to DEFRA and also wider event on the subject.
- ■ – PAAG update. First adopters probably have got as far as they will (risk switching them off if ask for more), no driver for others to adopt without legislation.
- ■ – flagged Scottish research project on buyer behaviour which Defra are considering contributing to.

Compliance concerns in Other Member States: Dover pilot has provided useful material. Is there anything others have that could help. ■ campaigns in 14/15, resulted in only minor sanctions.

Legislation: Post Implementation Review of NCMoPAO. Review of evidence is underway. A public consultation will be launched shortly.

Commercial movements: ■ – commercial post import checks seem to be missing underage puppies – LA’s picking up. ■ advised that there has been an increase in import volume amongst some known importers and suggested this might be a positive effect of the activity at Dover.

- APHA has introduced a risk based approach to the inspection of commercial movements of dogs. The risk criteria for inspection is based on a number of factors including the disease status of the country of origin, changing importer behaviour, volumes and history of compliance by the individual importer. Activity of importers will be monitored via import notifications and significant changes in practice, along with other intelligence, can alter their risk status and inspection frequency. APHA are moving to a centralised system for recording commercial import notifications which will help data analysis. ■ suggested APHA should ask for pet shop licence details during post import checking.
- ■ advised on issues around rescue dog imports – uncertainty on vaccinations. Known issue and various actions in play.
- ■ – Regarding rescue dogs can third sector organisations do anything to highlight issues? ■ - Association Cat Dog Houses (c120 members) could send something round. If companies or charities with a history high non-compliance rates could be identified RSPCA could engage.
- ■ – need to regulate the animal welfare and re-homing sector – it is happening in Wales.

Actions:

- ■ to send web link to PIR consultation out to attendees.
- ■ to see if cross EU Veterinary profession could be engaged.

6. Communication with workshop attendees.

- Keep in-touch by updating workshop attendees of the identified workstreams and progress to foster support and engagement

Actions:

- ■ to draft report and liaise with Dogs Trust

Date of next meeting to be arranged by correspondence.

Illegal Movement of Dogs and Puppies (IMDP) meeting

17 February 2017 10:30 – 13:00

Room G33, Nobel House, Smith Square, London SW1P 3JR

Summary Note

Attendees

Dogs Trust ██████████ – Veterinary Director
 ██████████ – Communications Manager

RSPCA ██████████ – Head of Public Affairs.

NAHWPE ██████████ – National Animal Health and Welfare Panel for England and City of London Corporation

Defra Graeme Cook (GC) – Deputy Chief Veterinary Officer
 ██████████ – Pet Travel Policy
 ██████████ – Pet Travel Policy

APHA ██████████ – Head of International Trade
 ██████████ – Field Services Team Leader (Dover)
 ██████████ – Animal Health Officer (South East)
 ██████████ – International Trade Portal Lead

1. Introductions

1.1 GC introduced himself as Defra's newly appointed Deputy Chief Veterinary Officer (DCVO). He brings direct policy experience of rabies controls and trade issues from a previous posting at Defra and returns following a veterinary advisory role in Switzerland (covering race horse health) and a period at the Ministry of Defence. GC will make pet travel policy a key area of focus for his DCVO role. He emphasised the importance of taking a holistic view and using a multi-agency approach to develop effective options for tackling illegal pet movements.

2. Note of meeting held on 12 September 2016

2.1 Notes were agreed.

2.2 ██████ confirmed that Ministers are aware of the benefits that the Dover pilot, made possible by Dogs Trust support, had delivered and which continue to be provided through enhanced enforcement. Officials continue work to identify the "sustainable and effective" options requested by the CVO.

2.3 ██████ outlined how changes in behaviour had been observed during both the pilot and continuing enhanced enforcement period:

- More dog transporters were registering their vehicles' animals under the welfare in transport requirements of Council Regulation (EC) No. 1/2005.

- The age of non-compliant dogs, associated with illegal trade, entering Great Britain under both the non-commercial Pet Travel Regulation (EU No. 576/2013) and commercial (Balai) Directive (92/65/EEC) appeared to have increased from circa 8 weeks to circa 12-13 weeks. Anecdotal evidence from Trading Standards is that these animals are then being advertised and sold to members of the public as younger animals.
- 2.4 ■ indicated that the pilot demonstrated that a veterinary presence was required at entry points and that the Dogs Trust would like pet checks brought under the remit of government agencies. Carriers may not be incentivised to conduct robust checks as they are commercial enterprises; their priority is to ensure a smooth and efficient customer experience. Experience gained from working with Eurotunnel (ET) suggested that provided documentary checks were correct, ■ was not prepared to challenge the owners of potentially underage animals.
- 2.5 ■ highlighted how APHA issues pet carriers with the necessary approval needed to transport pets moving under the PTS. These Required Method of Operation (RMOP) agreements could form a useful tool to influence their practices and require closer scrutiny. RMOPs can be amended or revoked, if necessary. Aging puppies is, however, very difficult. The Hungarian CVO recently responded to a UK CVO letter about underage puppies intercepted at Dover to advise that it is very difficult for Hungarian veterinarians to accurately age puppies when issuing pet passports.
- 2.6 ■ expressed concern that the government had appeared to change its policy approach as Article 13 certificates were no longer being issued under The Rabies (Importation of Dogs, Cats and Other Mammals) Order 1974 to detain non-rabies vaccination compliant pets found in the UK Control Zone at Coquelles, France. ■ clarified that APHA is a regulatory body and not an enforcement agency and that it had never issued Article 13 certificates at Coquelles. However, it does require that Eurotunnel (the approved pet carrier) check 100% of animals travelling under the PTS for compliance before they are permitted to enter the Control Zone. APHA conducts periodic inspections in the Control Zone to ensure that Eurotunnel's checks are effective and Defra/APHA's approach to these pet animal checks and compliance monitoring had not changed.
- 2.7 There was discussion about the objectives of interventions: is our primary objective to increase compliance with the animal health aspects of the PTS' requirements, i.e. to help ensure that animal diseases do not enter GB, and stop commercial movements taking place under the non-commercial PTS. ■ indicated that previous APHA campaigns to educate rescue organisations that animals should be moved into GB under the commercial "Balai" rules and not under the PTS had proved effective. If this were somehow repeated for puppy movements, the puppy trade itself would likely not disappear but it would at least become legitimate and be more transparent.
- 2.8 It was suggested that APHA conduct a "dip-check" of the information declared by pet owners/authorised persons accompanying pet animals entering GB to gain a picture of how legitimate this was. For instance:
- For commercial pet movements – investigate if the consignment details (i.e. final place of destination) provided on an [ITAHC and import notification form](#) actually exists.

- For movements of more than 5 pets under the PTS for the purposes of attending or training for a competition, show, sporting event – conduct checks on the [declaration document](#) to determine if the said events actually take place.
- Contacting the pet owners of animals who enter GB under the PTS in the possession of an authorised person – to check that the registered owner did travel within 5 days of date of entry, plus ask the owner to confirm whether they are still the keeper of the animal.

Action 1: APHA () to explore undertaking random checks of self-declared information relating to pet travel movements to determine reliability (potentially with local authorities or CIT, Carlisle).

2.9 The number of non-compliant pet animals seized inland by the City of London Corporation has been rising since January 2017. However, information on why these pet animals had been seized and how they were intercepted is not currently being shared with APHA's Intelligence Unit. This would be useful to help APHA build up a better picture of illegal movement patterns.

3. Update on actions carried forward from 12 September 2016 meeting

3.1 **Action 5-2 – Take the proposal for a Local Authority joint working option to National Animal Health and Welfare Panel ():** The concept of English local authorities sharing resources to jointly support activity to investigate/deter illegal pet movements was explored, but met with little interest. Inland Trading Standards teams were reluctant to commit due to limited benefits to be gained for their localities. Action closed.

3.2 **Action 5-3 – Survey local authorities to assess the costs of dealing with non-compliant dogs ():** Better metrics on such costs would provide a valuable picture of the scale of illegal movement issues facing local authorities and could be used to lever further interest from other departments, like HMRC. to report back to the group next month. Action open.

suggested there were two key issues facing local authorities: 1. the costs of dealing with non-compliant pets; and 2. uncertainty on what procedures to follow if they encounter such animals. advised local authorities generally do know what to do; however there may be issues around their willingness to, and the affordability of, taking action, i.e. quarantine and enforcement costs.

confirmed that the joint GB local authority guidance on implementing the Non-Commercial Movement of Pet Animals Order (NCMPAO) 2011 was currently being refreshed.

3.3 **Action 5-4 – Defra to share weblink to NCMPAO 2011 public consultation ():** Action completed. advised Defra aimed to publish a summary of responses in March. The post-implementation review timetable had slipped due to competing priorities regarding Defra's response to the winter 2016-17 UK avian flu outbreaks and EU-exit commissions from DExEU. Target was now to complete the review by the summer.

3.4 **Action 5-5 – To identify if cross-EU veterinary profession could be engaged (■■■■■ ■■■■■):** GC engaged with the BVA in December. BVA called for a cross-EU mandatory licensing system for Member States to capture and share commercial transaction data. Action open.

3.5 **Action 5-6 – Draft progress report for March 2016 CVO IMDP workshop attendees in liaison with Dogs Trust (■■■■■):** In progress. See later discussion at point 5.

4. **Workstream progress and future activity**

4.1 ■■■ talked through paper 5-3, which had been circulated prior to the meeting.

4.2 **Workstream 1 – Intelligence, data and metrics: Identifying the scale and the nature of the issue and provide a basis for targeting action to combat illegal trade.**

A constructive workshop was held last November that was well attended by interested parties. An intelligence working group will meet on 23 February to pursue its outputs.

Action 2: Defra to invite APHA Intelligence Unit analysts to a future IMDP stakeholder meeting to outline their work, highlight results and indicate the value of specific intelligence sources.

4.3 **Workstream 2 – Enforcing action, enforcement and deterrents: Disruptive activity to make illegal trade less attractive.**

■■■ requested views and agreement on what actions APHA should prioritise. Potential areas for action were:

- Conducting a “dip-check” of self-declared information supplied by pet owners.
- Educating pet transport carriers about the need for accurate and consistent pet checks, and that the requirement to ensure that pet animals they transported are in compliance with the PTS were clearly understood.
- Conducting a review of APHA’s pet transport carrier ‘Required Method of Operation’ (RMOPs) approvals to ensure that robust pet checking procedures were agreed and documented.

4.4 ■■■ suggested we assess what are the best tools we have and use this to drive activity. Creating sufficient frustration could force illegal traders to either: a) move towards compliance; b) stop; or c) resort to smuggling (but then face tougher sentencing and penalties).

4.5 APHA had picked up established trends in certain pet importing behaviour at Coquelles, France and Dover. Polish post-buses tend to arrive between 9:00pm-2:00am and Lithuanian post-buses at around 5:00am. ■■■ noted that post-Eurotunnel pet check inspections in the Control Zone must be non-discriminatory, i.e. APHA could not target only eastern European vehicle number plates. However, these time periods could be targeted. Eurotunnel does not permit vehicles to enter the Control Zone until 2 hours before their scheduled departure time.

4.6 ■■■ advised there is a developing trade on Wednesday nights in private Hungarian vehicles being used to import pet animals, including rescue dogs. Car owners are bringing different passengers each time, thereby avoiding an obvious pattern being developed (highlighting the

shrewdness of the illegal trading community). APHA plans to meet with Eurotunnel to discuss such repeat travellers and the data it gathers. [REDACTED] advised outcomes will be shared with the APHA Intelligence Unit and at the next IMDP quarterly meeting. GC suggested HMRC may be interested in repeat visit vehicles from a tax avoidance perspective.

- 4.7 [REDACTED] underlined how illegal imports from Europe were much more visible compared to the Irish trade in puppies, which was more hidden and possibly had greater welfare issues, e.g. outright smuggling of animals concealed behind hay bales in lorry containers. Anecdotal evidence from HMRC suggests the illegal trade in puppies from Europe was being driven by people who had switched from cigarette smuggling, due to lower risks from non-compliance with the PTS. In contrast, cigarette smuggling attracts higher penalties/risks, such as the seizing of goods; confiscation of vehicles; and potential detention in the UK of persons suspected of committing an offence.
- 4.8 Operation Delphin was a recent successful RSPCA-led operation at Holyhead where puppies without correct PTS or commercial (Balai) Directive paperwork were intercepted by the Local Authority and returned to Ireland. Aim was to educate Irish breeders and disrupt non-compliant trade. An observed side-effect was that traders appeared to shift their behaviour by moving puppies across the border into Northern Ireland and then ferry them to Liverpool. The RSPCA hoped to repeat the exercise. The Department of Agriculture, Food and the Marine now required all breeders with 6 or more breeding females to be licensed. [REDACTED] advised that this offered a better understanding of where the estimated 40,000 puppies bred in Ireland each year originate.
- 4.9 [REDACTED] stated there had been an increase in the number of non-compliant pets being picked up by local authorities since January. Animals were most often underage or did not have the correct paperwork, e.g. blank passports, no passport at all, or only having an eastern European vet vaccination card. Hampshire CC had also intercepted a growing movement of rescue dogs being imported incorrectly under the PTS from Gran Canaria. Animals are being flown to mainland Spain, where they then enter other EU Member States or are even exported to the USA. British companies appear to be involved. An issue affecting local authorities is that Magistrates may be reluctant to issue search warrants for multiple occupancy houses, since this would affect the rights of non-suspects.

Action 3: [REDACTED] to share information concerning '[REDACTED]' and '[REDACTED]' with APHA Intelligence Unit.

4.10 Workstream 3 – Demand and information: Activity to reduce ‘pull’ factor and enhance knowledge of potential UK purchasers.

Defra is contributing to the Scottish Government’s research project that is looking at issues surrounding the sourcing of pet dogs from illegal PTS movements and puppy farm imports. [REDACTED] is on steering group. Focus groups will be created to explore the motivations of recent puppy purchasers. Scotland ones started this week; there will be 15 focus groups in England and 5 in Wales. Project is progressing well and the aim is to publish mid-summer.

4.11 Workstream 4 – Compliance in other administrations: Supply evidence to authorities in other Member States and the EU Commission of non-compliance.

In November, the Chief Veterinary Officer wrote to CVOs in Hungary, Latvia, Poland and Slovakia outlining instances of non-compliance in dog consignments. The Hungarian CVO had responded to say that their investigations revealed that veterinarians found it difficult to accurately determine the age of young dogs. Defra will provide a detailed explanation of the puppy aging process that is operated in Great Britain alongside any future letters to Member States regarding the movement of underage dogs. ■■■ advised the EU Commission had also written to Hungary to recommend that veterinarians should not issue a pet passport if they are not satisfied that an animal is at least 12 weeks old.

4.12 Defra will share UK contact details to the EU Commission for the mutual sharing of intelligence relating to non-compliant movements of rescue/stray dogs.

4.13 Workstream 5 – Legislation: Identify if there is scope for domestic and EU legislation to be amended.

Ministers have not indicated their preferred approach for pet travel rules after the UK leaves the European Union, but the IMDP group will be informed of any developments. ■■■ highlighted the value in trying to agree a GB-wide consensus wherever possible.

4.14 Workstream 6 – Commercial rules: Identify any issues related to commercial movements of dogs and potential to address these.

■■■ will seek an update on this area at a forthcoming National Animal Health and Welfare Panel for England meeting. ■■■ believed that number of illegal movements occurring under the commercial Trade in Animals and Related Products Regulations (TARP) 2011 were increasing, and that the practice to reduce APHA post-import inspection checks after an importer had built up a period of compliance was a potential weakness. ■■■ advised this risk model was flexible. It could be amended if intelligence suggested a particular importer was likely to break the rules or was found to have illegally imported animals.

5. Wider stakeholder communications

5.1 ■■■ welcomed contributions, particularly on enforcement action, on a draft update note that Defra proposed to circulate to the attendees of the CVO's IMDP workshop held in March 2016. ■■■ advised that, since August 2015, the RSCPA had pursued 9 successful prosecution cases and 14 were pending (these related to illegally imported animals and UK-bred animals). These were mainly pursuing offences under fraud legislation.

5.2 ■■■ highlighted the value of APHA's Intelligence Unit. This now provides a central hub for local authorities to report intelligence and details of enforcement action they are undertaking.

Action 4: ■■■ to approach ■■■ and ■■■ for cases studies/figures to include in workshop update note (to be circulated in next few weeks).

6. AoB

6.1 ■■■ highlighted concern that approved couriers using the commercial movement legislation may also be carrying non-approved goods/animals without fear of checks, due to the legislation requiring that such consignments should not be hindered throughout their journey. ■■■ advised that APHA and Border Official can, and do, check vehicles carrying commercial

consignments if any suspicions are raised, either by intelligence or unusual paperwork, e.g. many pet animals or self-declarations that animals are moving with an authorised person in the absence of the pet owner.

6.2 Blank Belgium pet passports have recently been discovered in Slovakia. It is thought they are being used to disguise puppies bred in Slovakia as being of Belgian origin.

7. **Date of next meeting** – to be set by correspondence.

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would allow officials to make a similar decision on future cases without seeking authorisation from the CVO.

- [REDACTED] also referred to two rabies-related exercises held last year. The first facilitated by Dorset County Council (DCC) with the second (Exercise Cerburus) led by the Scottish Government. Defra veterinary advisers were involved in both exercises. DCC had concerns about susceptibility of the County's porous coastal areas with respect to illegal imports and wanted to test its systems through a multi-disciplinary exercise involving all the relevant agencies including APHA, Border Force and the Police. [REDACTED] role-played in the DCC exercise explaining that it had thrown up a number of practical and policy issues that needed further consideration; amongst these being the lack of legislative power available to inspect a yacht in instances where a pet had not come ashore. [REDACTED] said that he had experience and information on procedures for dealing with possible rabid dogs in third countries and offered to forward some helpful information on how to catch both healthy or rabid dogs. **Action 6:3 – [REDACTED] to forward [REDACTED] information on methods used for catching dogs.**
- [REDACTED] updated the Group on Exercise Cerburus explaining that the main objectives had been to explore the incident management and decision-making processes in response to an illegally imported rescue dog and subsequent rabies outbreak, including the handling of public communications. The exercise involved representatives from various government agencies together with their relevant public comms teams. Some issues had been picked up during the exercise, including the need for training initiatives and these were expected to be taken forward as part of a lessons learned exercise.
- [REDACTED] also referred to the circulated draft guidance for veterinary surgeons on dealing with suspect rabies cases. [REDACTED] referred to Point 7 of the document regarding cleansing and disinfecting of veterinary premises (other than where the suspect animal had been isolated) and wanted to know who should be expected to carry out this activity. [REDACTED] explained that consideration would be given to a risk based approach as the likelihood of rabies transmission was considered to be low, particularly if no biting or scratching were involved. [REDACTED] suggested that it may be worth putting this into context so that it is clear what was expected. [REDACTED] also referred to Point 3 of the document and suggested including a reference to 'keepers' instead of 'owners' with respect to bats and foxes. **Action 6:4 – Group to feedback comments to [REDACTED] on the draft guidance by 31 April.**
- It was agreed that the most effective method for communicating the new guidance to veterinarians should be through the British Small Animal Veterinary Association, British Veterinary Association and the Vet Record.

5. Presentation – Rabies R & D overview and revision of the draft Rabies Control Strategy

- [REDACTED] explained that Defra and devolved colleagues had agreed that the group's programme for 2017/18 would focus mainly on a review of the draft Rabies Control Strategy (RCS). [REDACTED] gave a presentation on rabies control and prevention, including plans for formalisation of the draft RCS which currently covers England and Wales only. The RCS links to the main Defra Exotic Diseases Control Strategy, which is reviewed annually.
- [REDACTED] highlighted four key areas to be developed under the review of the RCS, including a proposed timeline for the work programme. These were listed as:
 - Outbreak scenarios.
 - Vaccination.
 - Exit strategies.
 - Compensation.

- It was agreed that any other issues related to the RCS or rabies in general should also be considered under this work programme. The secretariat considers that this key piece of work will benefit greatly from the Core Group's input. **Action 6:5 –(i) Secretariat to confirm dates for the next series of quarterly meetings. (ii) Group to provide [REDACTED] with potential rabies scenarios for inclusion under the RCS.**

6. AOB

- [REDACTED] enquired whether Defra policy were aware of a Parliamentary Question (PQ) about Member States undertaking non-discriminatory checks with respect to rabies serology tests. [REDACTED] said [REDACTED] had no knowledge of such PQ but that it may have been sent to colleagues with responsibility for the Pet Travel Scheme. **Action 6:6 – [REDACTED] to forward a copy of the PQ for [REDACTED] to follow up with Defra colleagues.**

7. Conclusions and round up of preparations for the next meeting

- [REDACTED] referred to Point 5 of the Bat Rabies Risk Assessment Process document which stated that a bat in poor health should be examined by a veterinarian and not the BCT. [REDACTED] reiterated that the BCT would not normally advise a bat carer on matters pertaining to any decision with respect to the health status of a bat but viewed this as primarily the role of a qualified veterinarian. Furthermore, the BCT regarded the welfare of bats as always paramount. **Action 6:7 – [REDACTED] to email [REDACTED] with suggested amendments on the wording of the bat risk assessment document.**
- [REDACTED] stated that the next meeting will be scheduled for a date in June. **Action 6.7 – Secretariat to confirm date.**

Notes from Carrier Meeting 6th April, Dover

██████ welcomed attendee's and did introductions. An agenda had been circulated for the meeting, however this was very fluid and was more an opportunity to have an open discussion about the Pets trade, the challenges faced by the carriers and what support is required from APHA.

The group spilt into two smaller groups to discuss the challenges and the following points were captured:

- Carriers lease space in French port, cannot build their own spaces – may be able to dedicate lanes to pet moves at busy times but otherwise have to use what space is given to them. Checkers cannot be out among the traffic to check pets, give scanner to owner. Can't always see the pet – especially in a van, cannot make an assessment of welfare conditions. French law doesn't allow them to get in a vehicle.
- Checkers are put under pressure due to the time and environment. Taking proof of movement of the owner would add to pressure. What would "genuine proof" look like?
- Already find checks demanding with issues such as two versions of the passport. Have lots of genuine pet owner failures which are time consuming. Dealing with upset and confrontation.
- Non-compliant pets sent out of lane back to the office – so people potentially have time to amend documents themselves. Often checkers feel something is not right but are given something and feel they have to accept it. Would like a Gov issued prepopulated form.
- Declarations come in any format and carriers feel they have to accept them
- Carriers need everyone to be doing the same thing or companies doing it correctly will lose trade
- Difficult to identify commercial trade masked as Pets.
- Question they ask themselves currently are, is it better to ship the animals and tell APHA or stop them and risk abandonment which does happen. Would need more support if abandonment increased.
- Couriers and charity moves carriers don't check for Transporter Authorisations.
- Abandoned puppy's do happen, but not a real issue and are usually rehomed by staff – DT could help and advise with this
- No contingency plans
- What does proof of ownership look like?

- Like APHA to do checks – find checks complicated and some would be happy to offset their charges paying for this.
- Would like number of pets reduced from 5 per person but is written into EU law, causes a problem for carriers as allows larger numbers of dogs to travel
- Conflict between customer service and compliance
- Devise a system where non-compliant pet details are circulated between all carriers stop them going between carriers/ports (agreed to implement)
- Training required on false documentation and non-compliance (APHA to provide)
- Owners can turn up with pets, don't have to be pre-booked
- Microchip only recorded when pet is booked in
- Info sheet to be handed out check in
- Intel into commercial trade – captured over 1 week focussing on 1 country – how many dogs and at what times
- In the short term we could:
 - Update website detailing what is required – some travellers don't read it
 - Provide links to Pet Travel Scheme info
 - Update .gov.uk
 - Website Info - would be good if a pop up appeared on carrier website if they tried to book 5 dogs or more advising of a commercial movement
 - ████████ to circulate ██████ guidance note and for this to be put on website. This could be given out by checker on suspicion to start educating those who genuinely don't know they should do something different
 - Carriers to demonstrate the issues to their own IT department

Other Discussions:

- Data Capture – currently use Pets database and EX21 which is sent to APHA. Discussed possibility of an app to capture info such as microchip, species, date of birth and country of origin. If carriers could access info for their own reporting this would be beneficial. Hardware would be provided by the carriers. Dogs Trust would also welcome this to have information on date of arrival when assessing

risks. Carriers only capture info on lead passenger. Carriers advised APHA would require a blanket data protection request to the carriers once.

- Problems with sharing intel on frequent travellers etc is that depends on how it is recorded eg could record lead passenger or reg number
- Dogs Trust updated that they are educating the public not to purchase a dog from Romania.
- Policy updated that levels of compliance had risen as a direct result of the puppy pilot and that they age of the animals is increasing

Actions:

Improve information on carrier website, providing links to Pet Travel Scheme Information and .gov.uk – **Action - Carriers**

Review information on .gov.uk to ensure it is clear – **Action - APHA**

Carriers to liaise with their own IT departments to demonstrate their issues and look into the possibility of having a 'pop up' box on their website at the point of booking advising that if you try to book 5 dogs or more, this is a commercial movement – **Action - Carriers**

Circulate guidance provided by [REDACTED] to the carriers who could add this to their website and handed out by checkers – **Action – APHA [REDACTED] to circulate**

Intel officer to liaise with carriers to agree a process for capturing specific information on commercial trade over a 1 week period, from a chosen country – **Action – [REDACTED]**

Non – Compliant Pet details are circulated between all carriers to stop them going between carriers/ports – **Action – Carriers to implement immediately**

Training to be provided to Pet Checkers by APHA to identify false documentation and non-compliances – **Action – APHA**