



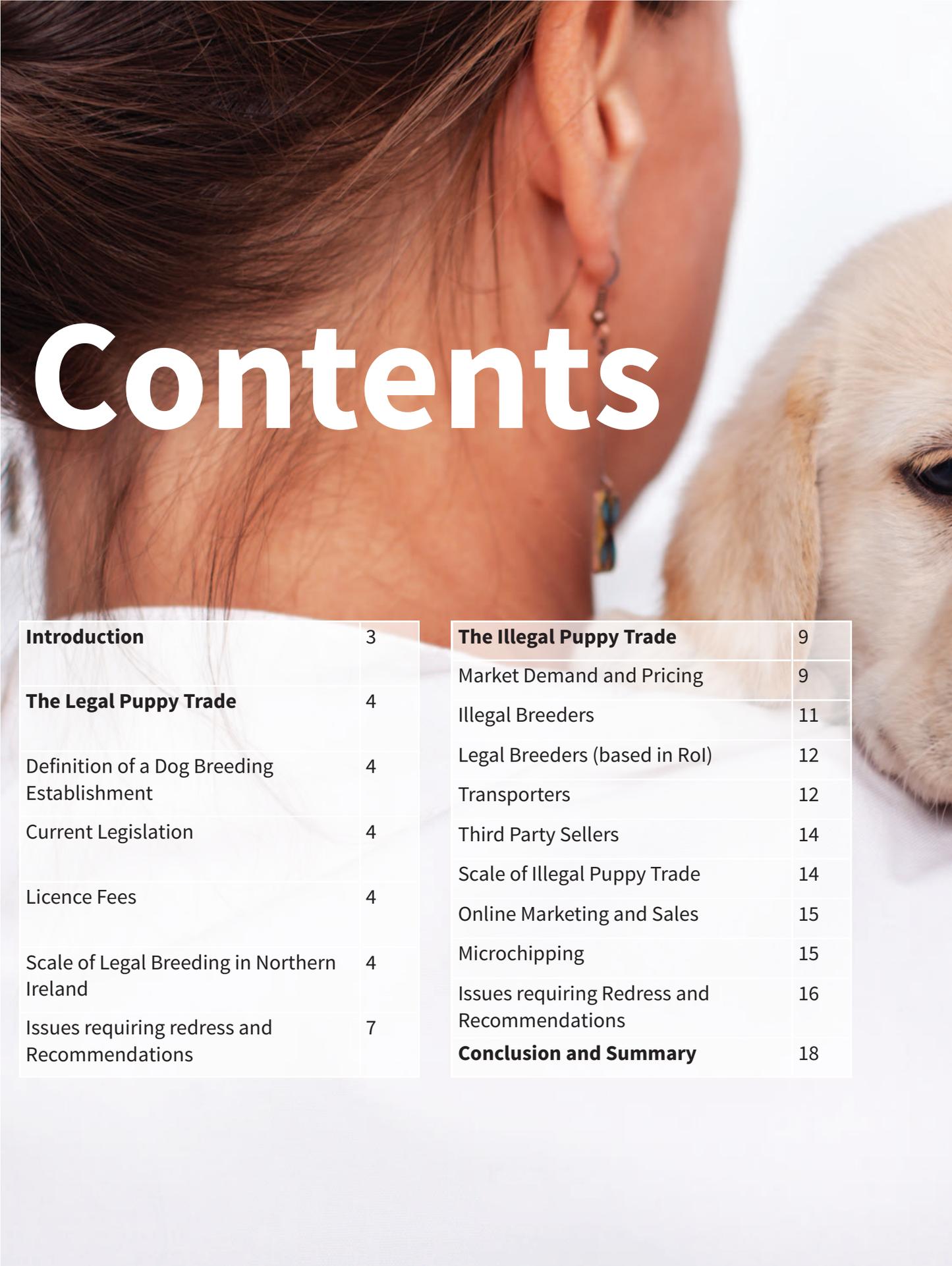
USPCA

PROTECTING ALL ANIMALS ESTD 1836

“Puppy Dog Fortunes”

A Report on the Puppy Trade in Northern Ireland





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Introduction

Licensed industrial puppy breeders are joined by those who participate in the puppy trade illegally, with both ruthlessly exploiting defenceless companion animals; causing misery not just to the animals but to the unsuspecting public who are often left with a sick or dying pup.

From an animal welfare perspective, we fear that this industry is teetering dangerously on the edge of being uncontrollable in the absence of more effective regulation and enforcement.

Dogs and pups are the most popular pets in the United Kingdom and Ireland. For many people, they offer companionship, support and a special emotional bond. However, for others, dogs are merely a lucrative source of income. With huge profits to be made, less scrupulous individuals are being attracted to the business, ignoring minimum regulations, breeding illegally, causing disease and suffering to the mother and pups, and distress and sorrow to the unsuspecting buyer.

The puppy trade is a big business with demand, particularly from the GB market, driving prices up to a point where even less popular breeds are selling at circa £2,000 per pup. Over the course of the past two years, Covid-19 lockdowns have fanned the flames of demand, increasing puppy farming activity as it was seen as an exploitable and lucrative trade.

This report examines the puppy trade in Northern Ireland including the illegal trafficking of dogs from the Republic of Ireland through Northern Ireland to Great Britain.

The Legal Puppy Trade

Definition of a Dog Breeding Establishment

A dog breeding establishment is one or more premises within the same district council area, operated by the same person from which that person keeps three or more breeding bitches, and also either;

- breeds three or more litters of puppies in any twelve-month period, or
- advertises three or more litters of puppies for sale in any twelve-month period, or
- supplies three or more litters of puppies in any twelve-month period, or
- advertises a business of breeding or selling of puppies.

Current Legislation

The Welfare of Animals (Dog Breeding Establishments and Miscellaneous Amendments) Regulations (Northern Ireland) 2013 requires that anyone wishing to operate a dog breeding establishment must first obtain a licence from the district council in which the establishment is located.

It is an offence to operate a dog breeding establishment without a licence. It is also an offence to contravene any condition of a licence to keep a dog breeding establishment. The penalty for these offences is a fine not exceeding £5,000 and/or, imprisonment for a period of up to six months.

District Councils are responsible for the regulation of dog breeding establishments. Applicants are required to meet minimum standards in respect of accommodation, environment, mating, whelping, behaviour, socialisation and health. The establishments will be inspected as part of the application process.

Policy in relation to the inspection of dog breeding establishments after a licence is granted appears to vary across each district council. Some inspect twice a year, others once a year and others once a year if there is a complaint. None of the councils monitor compliance with regulations in relation to the number and frequency of litters produced by breeding bitches.

Licence Fees

Licence fees for breeding establishments vary depending on the number of breeding bitches held and range from £150 for 10 or less bitches, and up to £350 for 200 bitches, with an additional £50 for every 100 bitches thereafter.

The Scale of Legal Breeding in Northern Ireland

In Northern Ireland there are at least 45 licensed breeders – puppy farmers, who in turn have a total of 1,700 breeding bitches.

1,700 breeding bitches averages out at just under 40 breeding bitches per registered breeder however, we know that there are establishments out there who have 100+ breeding bitches and shockingly, some

with a staggering 600 + breeding bitches. Breeding on this industrial scale calls into question the provision of minimum welfare standards and whether the dogs and pups are being kept in conditions which meet the five freedoms as outlined in the Animal Welfare Act (2011) and in particular the minimum standards required by the 2013 Dog Breeding Establishments' regulations with regard behaviour, socialisation and enrichment.

Condition 4: Normal behaviour

- (1) *A dog shall have regular access to adequate facilities to enable them to exhibit normal behaviour patterns through play, interaction and relief from boredom.*
- (2) *Where not detrimental to the health of the dog, the dog should have regular exercise suitable to the breed and size of the dog.*

Condition 5: Socialisation

The licence holder shall have a written socialisation programme for puppies approved by the inspector.

Condition 6: Enhancement and enrichment

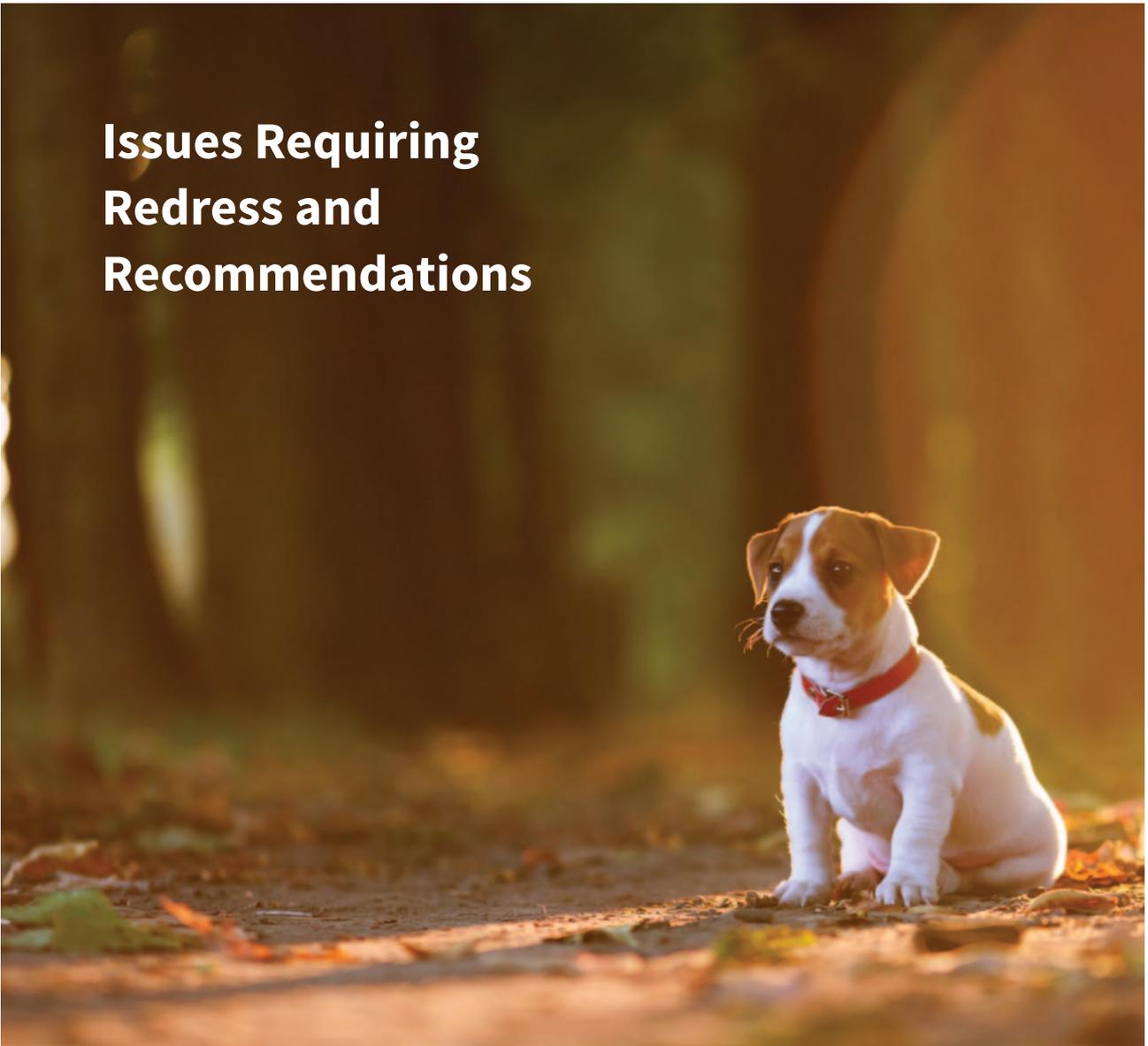
The licence holder shall have a written enhancement and enrichment programme for bitches, stud dogs and other dogs approved by the inspector.

As an illustration of scale (and potential profit), an examination of the most recent (January 2020) financial accounts of one Fermanagh based legal breeding establishment reveals that the assets of this business totalled more than £1.5 million. This included more than £1 million categorised as cash at bank or in hand. A Freedom of Information request by the Dogs Trust in 2020 reveals the business is clearly operating at an industrial scale with 695 breeding bitches. The financial accounts also state that during 2020 the business had an average of 10 employees. This indicates that each member of staff was responsible for 69 bitches and an unknown number of pups and stud dogs. This raises serious welfare concerns. It is unlikely that the requirements of the Animal Welfare Act could be met with this staffing ratio. While the establishment may have had written programmes with regard socialisation and enrichment, the ability to deliver the programmes would appear to be impossible and apparently unmonitored by the licencing authority.

The information in the table which follows was collated by Robin Newton MLA as part of the research to inform his Private Members Bill to provide greater control over the puppy trade in Northern Ireland.

Council District	Dog Breeding Establishments	How many Breeding bitches within each establishment?	How many litters produced by registered bitches?	How many council visitations annually?
Antrim and Newtownabbey	0	N/A	N/A	N/A
Ards and North Down	4	1 breeder – no more than 10 bitches.3 breeders – more than 26 but less than 50 bitches. Very least 53	Information not held	1 or if there is a complaint.
Armagh City, Bainbridge and Craigavon	9	90, 10, 22, 55, 13, 24, 13, 22, 39Total 288	Information not held	Full inspection on annual renewal of licence and if there is a complaint.
Belfast	0	N/A	N/A	N/A
Causeway Coast & Glens	3	4,4,11Total 19	Information not held	1
Derry City and Strabane District	0	N/A	N/A	N/A
Fermanagh and Omagh	8	836 all together	Information not held however- Each bitch only allowed to have 3 litters over 3-year period and 6 litters overall.	2
Lisburn and Castlereagh	1	9	Information not held	1
Mid & East Antrim	1	8	Information not held however- Each bitch only allowed to have 3 litters over 3-year period and 6 litters overall.	2 or if there is a complaint.
Mid Ulster	8	10, 15, 60, 150, 12, 20, 4, 115Total 386	Information not held	1 or 2
Newry, Mourne and Down	11	9, 6, 18, 33, 32, 5, 4, 7, 9, 6, 4Total 133	Information not held	Full inspection on annual renewal of licence and if there is a complaint.

Issues Requiring Redress and Recommendations



The USPCA is calling for more stringent regulation of licenced breeders in Northern Ireland to enhance welfare standards and provide greater protections to mothers and their pups.

1. Industrial Scale of Operations

The scale of operations at these establishments is cause for grave concern as we fear severe negligence of the very freedoms afforded to animals in legislation. In particular, the requirements to be able to display normal behaviour, to be socialised and have an enriched environment.

Additional Regulations should be legislated for; setting out minimum staffing ratios to ensure provision of appropriate levels of exercise, play and socialisation. Conditions 5 and 6 of the current regulations should be updated to require evidence of socialisation and enrichment, not just a written programme.

2. Lack of Regular Inspection and Monitoring Compliance with current Legislation

Annual inspection of breeding establishments is insufficient to provide assurance that the current regulations are being complied with and should be augmented with an additional unannounced inspection each year.

Registered breeders may produce up to three litters every three years from each breeding bitch, and a total of six litters in their lifetime, however this isn't being monitored by the licencing authorities, leaving it open to abuse. Breeding records should be monitored as part of the inspection regime and matched to the number of pups sold to provide assurance that the breeding bitches are not being exploited and abused.

3. Loophole in Licencing Regulations

USPCA are aware of a loophole in the breeding establishment legislation that allows individuals to breed litters from multiple breeding bitches without a breeding establishment licence and, by definition, without the requirement to meet the standards as set out in the legislation. This can occur when multiple members of a family each licence a number of bitches below the threshold at which a breeding licence is required. It is known that this loophole has been exploited by at least one unethical (and unlicensed) breeder, who as a consequence is breeding litters from more than twenty bitches. Such activity is undeniably inconsistent with the purpose and spirit of the regulations. This loophole should be closed as soon as possible.

4. Inadequacy of the Council Animal Welfare Budget

It should be recognised that local councils will require additional resources to enforce any new legislation, including additional 'spot inspections.' It is suggested that this could, at least in part, be financed through an increase in the breeding establishment licence fees, which are very inexpensive.

5. Lucy's Law

Lucy's Law is named after a Cavalier King Charles Spaniel who suffered multiple health conditions including a curved spine, bald patches, epilepsy and infused hips as a result of spending most of her life kept in a cage and used to breed litters of puppies at a Welsh puppy farm.

Lucy's Law makes it illegal to sell puppies and kittens under 6 months old through a third-party seller, such as a pet shop or a commercial dealer; this takes away the 'middle man' puppy farmers and traffickers hide behind in order to make a profit by breeding dogs in squalid conditions which much of the public is still unaware of despite years of campaigning for awareness.

Already, the largest puppy farmers, including those in Northern Ireland, are taking steps to circumvent the legislation by merging their businesses with dealers and pet retailers, whereby the dealer can be presented as also the breeder and therefore be compliant with the legislation.

The Law applies in England, Scotland and Wales but not Northern Ireland. While this can be seen as disappointing, it also allows for lessons to be learned and ultimately, better legislation to be introduced. Robin Newton MLA is bringing forward a Private Members Bill to do just that and it is vital that it passes into law in this mandate.



The Illegal Puppy Trade

Market Demand and Pricing

The breeds of dogs that are ‘farmed’ or bred and subsequently trafficked are likely to change in line with availability and current market demands and trends. The value and price of pups in the Great British market is significantly higher than in Northern Ireland and the Republic of Ireland. This provides a driver for illegal breeding and transportation of animals that are seen as nothing more than a commodity to the people who are engaged in this cruel business.

COVID 19 has had a significant impact on the demand for dogs and pups. As people were spending more time at home, many turned towards pets to combat loneliness and as a companion during exercise periods. A total of 24% of UK dog owners recently surveyed said they had purchased (or adopted) a new pet since lockdown commenced.

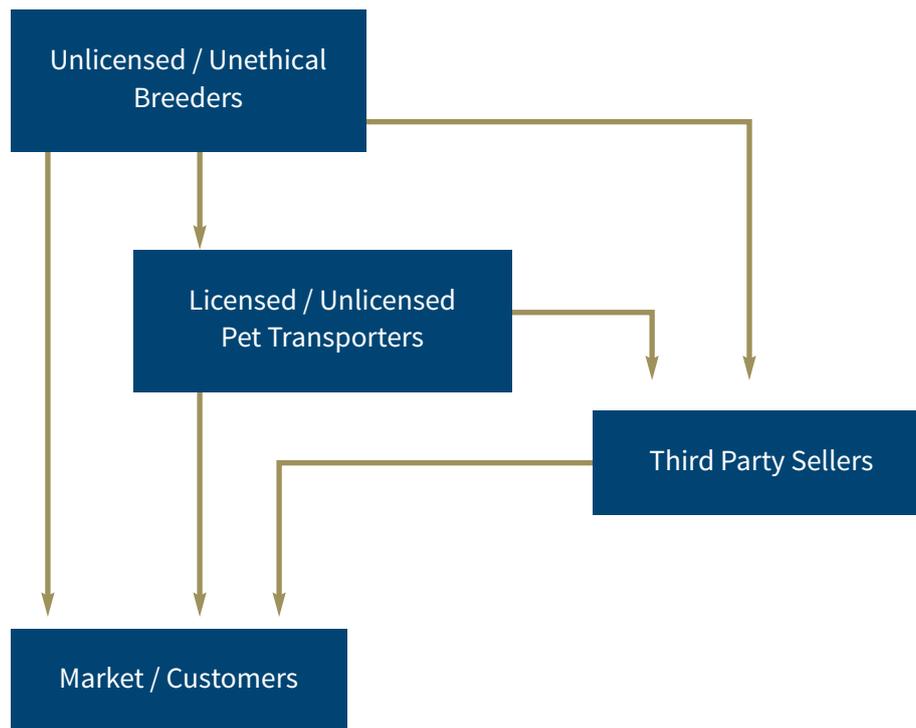
Suddenly prices for specific breeds doubled and the UK market struggled to keep up with demand. In Scotland, prices for Cockapoo, Pug and Chihuahua pups have surged during the lockdown to upwards of £2,000.¹ Recent research carried out by pet retailer, Pets at Home showed that the average puppy in the United Kingdom now costs circa £1,875. The most expensive breeds can cost as much as £3,000.

With huge profits to be made, this imbalance provides ample opportunity for people acting illegally and irresponsibly to get rich, import puppies and take advantage of pet buyers.²

Based on information held by USPCA, illicit breeders based in both Northern Ireland and the Republic of Ireland are engaged in the breeding of a variety of types of dogs. Many of these are consistent with breeds currently in greatest demand, specifically Pugs, Chihuahuas, Cockapoos, French Bulldogs, Spaniel type dogs (including Cavalier King Charles) and Shih Tzus.

The demand for pups is traditionally at its highest in the run up to Christmas. Research by the Dog's Trust in 2019 indicated that (UK) online searches of the phrase 'buy a puppy' increased by a staggering 44% in the week before Christmas (in 2018). A 27% increase was also noted for the phrase 'get a dog'. It is particularly worrying that searches related to persons wanting to give up a dog peaked during the month of January.

Who is Involved in the Illegal Puppy Trade?



The individuals or groups who are involved in this trade can be broken down into four distinct categories.

- **Illegal Breeders** (based in Northern Ireland and the Republic of Ireland)
- **Legal Breeders** (based in the Republic of Ireland)
- **Transporters** (both licensed and unlicensed)
- **Third Party Sellers**

This activity can be considered as a form of organised crime. Individuals and groups who are engaged in this trade are often also involved in other types of criminality. It is seen by those involved as a highly profitable but low risk form of crime.

Illegal Breeders

- Over the last two years USPCA have had knowledge of more than 30 unlicensed dog breeding enterprises operating across Northern Ireland. A number of others are known to be based in the Republic of Ireland. It is suspected that a number of these establishments are operating at a significant scale. These larger enterprises are often referred to as puppy farms.
- A puppy farm can be described as a location or enterprise where multiple dogs are continually bred, and the resulting puppies are sold.
- It is common for pups that have been bred in such establishments to suffer from serious illnesses and/or genetic defects. This is the result of poor and unhygienic breeding practices. Many of these unfortunate animals will become so sick from parvovirus or other infections that they will die before they are sold (or shortly after purchase).
- In addition, these dogs can develop severe psychological damage, and in some cases, even when rescued, never fully recover. Some of these animals remain fearful and shut down and require extensive rehabilitation to get them to the stage where they can be adopted and rehomed.

Where does Unlicensed Breeding Occur?

As mentioned above, USPCA have been aware of more than thirty instances of unlicensed breeding within the last two years. These establishments have been located in seven district council areas. The vast majority have been located in more rural areas within the following four council areas:

- Newry and Mourne
- Armagh City, Banbridge and Craigavon
- Mid Ulster
- Fermanagh and Omagh

However, illegal breeding has also been reported in urban locations, including within the Belfast City Council area. It is likely that this activity regularly occurs across all council districts.

Breeding occurs in a variety of buildings, including farms (both occupied and derelict), residential houses (often in sheds) and even in commercial premises.

Breeding Conditions (Harm and Welfare Issues)

Dogs used (in breeding) by unethical and unlicensed breeders are often kept in inadequate, confined, overcrowded and unhygienic conditions. In some instances, breeding bitches will not leave their cage to exercise, go to the toilet, socialise, or play. It is much less likely that appropriate steps are taken to ensure the breeding dogs and resulting pups receive necessary veterinary or general care. Appropriate and necessary vaccinations may not be given, leading to little or no parasite control. This often leads to long-term health and/or behavioural problems in breeding bitches and puppies born in these conditions.

These concerning issues have been observed many times in Northern Ireland. USPCA are aware of:

- Numerous dogs being kept in inadequate and squalid living environments. This includes wheelie bins being used as makeshift kennels, farm outbuildings with missing roofs and agricultural sheds. In another instance dogs were kept in small cages in the rear of a garden.
- Multiple instances of breeding bitches housed in sheds (24 hours per day). These poor animals are deprived of any natural light. In the worst cases, dogs are believed to have been kept in these conditions for more than two years.
- Some dogs have been kept in ‘battery farm’ conditions.
- Dogs have been noted in a poor physical state. (including muscle wastage, severe dental disease and serious skin conditions).
- Many pups bred under these circumstances have suffered and died from preventable illnesses including parvovirus.

Canine Fertility Clinics

The substantial profits that can be gained from illegally breeding dogs and the increased demand for pups noted during the COVID 19 pandemic has driven some illegal breeders to go to shocking lengths to increase productivity. Canine fertility clinics are beginning to pop up across Great Britain and now also in Northern Ireland. These establishments appear to operate without veterinary supervision.

USPCA are aware of one Northern Ireland based clinic that advertises a number of services on social media. These include progesterone testing, cytology, semen chilling and shipping, ultrasound scanning, stud dog fertility testing and artificial insemination. It is our view that a number of these procedures should only be carried out by a qualified veterinary surgeon. The fact that they are being performed by unqualified practitioners is extremely dangerous for the health and welfare of these poor animals.

Legal Breeders (based in the Republic of Ireland)

USPCA are aware of a number of legal and licenced breeders based in the Republic of Ireland who play a key and active role in the illegal puppy trade. Pups are often supplied to third party sellers and are often trafficked for sale in the lucrative British market. These pups frequently transit through Northern Ireland.

By disguising and presenting these pups as Northern Ireland dogs they avoid the additional requirements of the pups being a minimum of 15 weeks old and having a rabies vaccination.

Transporters

Puppies that have been illegally bred in Northern Ireland or the Republic of Ireland, or legally bred in the Republic of Ireland are often trafficked or transported to lucrative markets in Great Britain via Northern Ireland.

USPCA are aware of more than 20 individuals or networks who are believed to frequently engage in this activity. A number of these transporters are unlicenced. However, USPCA are aware of 6 licenced pet transport companies that play an active role in the illegal trafficking of puppies, in clear contravention of the regulations detailed below.

Regulations – The Commercial Movement of Pets from Northern Ireland to Great Britain

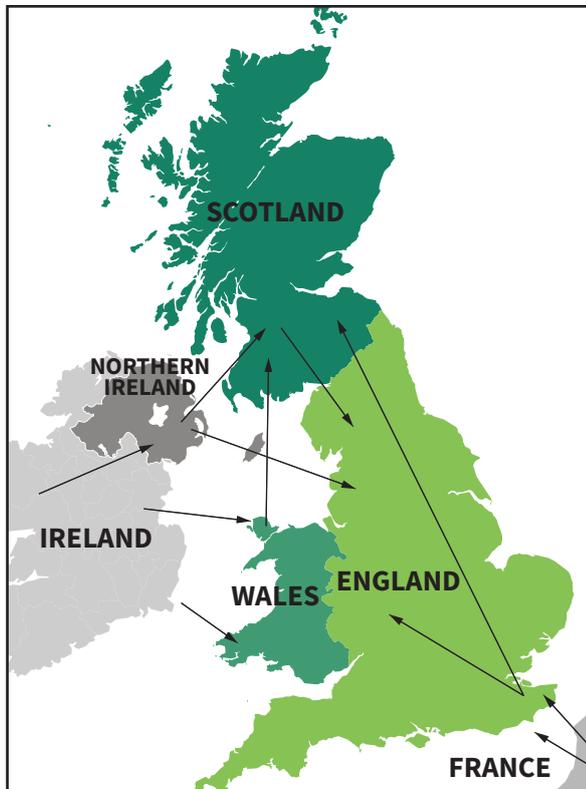
Since Brexit there has been no change to the requirements for the commercial movement of pets from Northern Ireland to Great Britain, other than the pets must be microchipped at eight weeks old.

Where more than five pets are travelling in a consignment, the transporter will need to comply with the pet travel scheme rules. In addition, for commercial trade, they must also meet the requirements laid down by the ‘Balai’ Directive. This directs that where puppies are being transported between EU Member States for commercial purposes, they must be microchipped, vaccinated against rabies, health checked and be accompanied by a pet passport. Effectively this means that puppies must be 15 weeks of age to travel.

Handover / Transfer of Pups

Sometimes the individuals involved in trafficking the pups will collect the animals directly from the breeders and they may also deliver them straight to the intended customer (or middleman). Others will meet suppliers and customers at pre-arranged locations. This is known to include motorway service stations, derelict farm complexes, accessible locations close to the ports used and various halting sites.

It also appears that some customers travel to Northern Ireland from Great Britain to pick up pups close to ports before travelling back on the return ferry. In January 2021 SSPCA informed USPCA that a vehicle was making regular stops outside the Cairnryan Terminal at Belfast Port. Foot passengers had been observed leaving the ferry, picking up dogs (normally single pups) from the vehicle before returning to the ferry for the return journey.



Routes to Market

As discussed earlier in this report, the demand for puppies (which has increased during the Covid 19 Pandemic) and the substantial profit to be gained from the sale of pups in Great Britain fuels both the puppy farming ‘industry’ and subsequently the illicit trafficking of these poor animals.

The map³ shows the significance of the Republic of Ireland and Northern Ireland (from a breeding perspective and also as a key part of the transit route from the Republic of Ireland) in the illicit trafficking and sale of ‘farmed’ pups to feed the increased demand in Great Britain.

Puppies enter Great Britain (from Northern Ireland and the Republic of Ireland) via a number of ferry ports. The dogs are then distributed across the country to key locations, predominantly large cities linked to the national trade. Puppies entering Scotland and England may be arriving from Ireland (both north and south) or mainland Europe. While puppies entering Northern

Ireland and Wales, have mostly arrived from the Republic of Ireland.⁴ Some of these transporters make return journeys on the same day.

Vehicles, Concealment and Conditions

A range of vehicles are used by traffickers to transport the pups by both land and sea. An analysis of the information held by USPCA indicates that vans (often Ford Transits or similar sized vehicles) are most commonly used for this purpose, followed by cars (sometimes towing an adapted trailer) and pick-ups. Larger vehicles (including Horse Transporters and Furniture Removal lorries) are also known to be used. These have sometimes been specifically adapted for this purpose.

Little or no care is taken to protect the health and welfare of the pups so a large number of animals can be crammed into individual vehicles. At least two transporters are believed to regularly transport sixty pups at a time in Ford Transit type vans. Pups are sometimes transported in foldable wire cages stacked on top of each other. Urine and faeces can leak down on top of the poor dogs contained in the lower cages.

Some traffickers are known to conceal the pups prior to and during transportation. This concealment contributes to the cramped conditions experienced by these dogs.

The seizure of 27 pups at Cairnryan in May 2018 provides an example of the conditions in which these pups are sometimes transported. The pups (some of them are pictured below) were concealed in a van. They are believed to have originated from the Republic of Ireland but transited through Northern Ireland. The dogs were not microchipped and were not accompanied by pet passports (required for the commercial movement of dogs to the United Kingdom from the Republic of Ireland). As can be seen from the photographs below, they were transported in cramped, unhygienic and harmful conditions.⁵ Up to a third of the pups subsequently died from parvovirus.



Third Party Sellers

USPCA have knowledge of a number of individuals and groups, who are suspected of being ‘third party sellers’. These people purchase litters of pups from both licensed and unlicensed breeders. They are then sold on for substantial profit. Although these individuals are not involved in breeding, they play an important role in the supply chain. Some operate at a significant scale. The pups are often temporarily housed in cramped and unhygienic conditions. Some of these unfortunate pups are known to be trafficked to Great Britain.

In January 2021 media in the Republic of Ireland (quoting a representative from SSPCA) reported on a new trend in which ‘Irish dealers’ were renting Airbnb houses in Scotland to sell ‘fashionable’ cross-breed puppies (which had been advertised on sites like Gumtree). This is to give the impression to customers that the pups had been bred locally from the family pet; rather than on a puppy farm in the Republic of Ireland.⁶

Scale of the Illegal Puppy Trade

While it is not possible to fully assess the scale of the illegal puppy trade in (and transiting through) Northern Ireland, it is likely that many thousands of pups are illegally bred, trafficked and sold each year. As discussed above the demand for this trade has increased significantly, at least partly due to lockdown periods implemented to combat COVID 19.

As mentioned earlier in this report, USPCA are aware of more than twenty individuals and groups who are frequently engaged in the trafficking of pups to Great Britain. One single 'licensed' pet transporter is estimated to be illegally transporting 120 pups every week (two trips per week, approximately 60 dogs per journey). This is carried out on behalf of breeders from both Northern Ireland and the Republic of Ireland. This single transporter is estimated to be 'trafficking' in excess of 6,200 pups per year. Based on the average price of £1,875 noted in research by Pets at Home (see below for further details) this means these pups have a prospective value of £11.7 million.

It is likely that many or all of the other known 'traffickers' are operating on a smaller scale. However, even if they were all only operating at one quarter of this rate this would mean that a total of 37,200 puppies were being trafficked annually. These would have a potential value of £69.75 million. It is clear that many individuals and networks who engage in this cruel and unethical activity make substantial profits from their crimes.

Between 2015 and 2019 HMRC seized more than £5 million from individuals involved in the illicit breeding and sale of pups across the United Kingdom. This was in respect of unpaid taxes. This is another indicator of the huge profits emanating from this trade.

Online Marketing and Sales

Online markets provide a platform for licensed and legitimate breeders to advertise pups to customers who wish to acquire a new family pet. Unfortunately, these sites are also regularly utilised by individuals or groups who are involved in the illegal breeding of dogs and third-party sellers to advertise and sell underage and/or sick pups to unsuspecting members of the public. Some of these breeders employ others or use associates to place adverts on their behalf.

To give an indication of scale, on a single date in August 2021 there were more than 300 active adverts in relation to pups for sale on freeads.co.uk linked to Northern Ireland based sellers. The price of the pups ranged from £250 to £3,000.

Individual telephone numbers are frequently linked to multiple adverts selling a variety of breeds of dogs. While it is acknowledged that many of the adverts posted on such sites are likely to be from legal breeders and responsible vendors, similarly many will be directly linked to the illegal puppy trade and there is currently no way for the unsuspecting public to differentiate.

Those linked to the illegal puppy trade are also becoming more sophisticated in their presentation of the pups – using temporary addresses through Airbnb, pretending the pups were bred from the family pet and having a “show” mother at the house. Then, when something goes wrong such as the pup purchased having an underlying illness, the seller is untraceable.

Microchipping

There is a legal requirement for all dogs across the United Kingdom (aged over 8 weeks old) to be microchipped. Compulsory microchipping has been in place in Northern Ireland since 2012. Microchips contain a unique number which can be matched on a database which is maintained by one of a number of microchipping companies. Along with information to identify the dog and its owner, data relating to the breeder (and therefore the origin of the dog) is recorded. This information is retained for the lifetime of the dog.

Analysis of information held by USPCA indicates that some puppy traffickers will transport puppies irrespective of whether they are microchipped or vaccinated and will go to some lengths to conceal the pups because of this.

Other ‘traffickers’ or pet transporters go to some lengths to conceal or change the details (particularly in relation to origin). These pups are microchipped for it to appear that dogs coming from puppy farms in the Republic of Ireland were instead legally bred in Northern Ireland or Great Britain (therefore not requiring a pet passport or veterinary certificate). The actual microchipping often takes place prior to transportation, probably at pick-up or handover locations.



The USPCA is calling for more effective enforcement of existing legislation and enhanced powers for enforcement agencies to disrupt and curtail the illegal puppy trade. There must be consequences for the perpetrators of these cruel and highly profitable crimes.

1. Illegal Breeding

There is an inconsistency of approach across district councils to illegal breeding and at times an inadequate response. The USPCA is not aware of any prosecutions for illegal breeding which carries the potential penalty of a fine not exceeding £5,000 and/or, imprisonment for a period of up to six months.

The USPCA experience is that illegal breeders may be asked to apply for a licence.

There have also been occasions when the USPCA was of the opinion that dogs and pups should have been seized due to the poor conditions in which they were being housed but this view was not shared by the council officers stating there was not clear evidence of neglect or abuse. From experience we are aware that even though pups may look healthy, this can change very quickly, with pups becoming very ill (with parvovirus or other diseases) within days. Our concern is that budget constraints are driving animal welfare decisions; with the costs associated with caring for seized dogs dissuading enforcement action except in extreme circumstances of neglect.

There should be zero tolerance of illegal breeding and all illegal breeders should be prosecuted under existing regulations.

The legislation should also be enhanced to allow pups to be seized, irrespective of welfare conditions, and passed immediately to animal shelters for rehoming. This would provide a clear deterrent to those individuals involved in this criminality and remove any budget concerns attached to seizure.

2. The Ports and Transporters

Thousands of pups are trafficked to Great Britain for sale each year. The ports have a key role to play in controlling the transportation of illegally bred pups between Ireland (both sides of the border) and Great Britain and it is clear that existing practices are inadequate. It is important that a robust inspection regime is put in place to prevent and deter the illegal trafficking of pups between the two islands. This should include routine microchip scanning and targeted enforcement based on identified threat, risk and harm.

Some 'licensed' pet transporters are involved in this illegal activity, disguising the origins of the pups. There must be consequences for these profiteering transporters. The regulations in respect of transport licensing need to be tightened. The licences of pet transporters who contravene regulations should be revoked.

3. Online Sales

Online advertising is the route to the unsuspecting buyer for the illegal breeder and dealer. While there are precautions the public can take to avoid heartbreak, it remains a challenge to differentiate between the criminals and the genuine breeder. Action is required to assist the public to identify genuine breeders and to provide traceability for the rogue traders.

A list of registered breeders should be published (and updated) by local councils to help potential purchasers make informed decisions.

Legislation should be introduced to require any person who sells or supplies more than 5 pet animals in a calendar year to register with their local council. Sellers of pet animals online should then be required to include their registration number on any advertisement. This would provide full traceability and thereby hold to account the illegal puppy farmer or rogue dealer.

4. Canine Fertility Clinics

The risks associated with these clinics are discussed earlier in this report. They appear to be operating outside of regulations. Urgent review of their operation is required.

5. Microchipping

Microchipping was introduced to provide traceability for dogs. Microchipped pups can be registered to sixteen separate (approved) databases. This provides challenges when attempting to trace the origin or owner of a microchipped dog or even simply wanting to update records. It also appears that fraudulent microchipping occurs on a frequent basis to facilitate the trafficking of pups from the Republic of Ireland to Great Britain. There is a need to review the current Microchipping structures, provide tighter regulations on who can microchip and simplify the search capability.

Conclusion and Summary

The Legal Puppy Trade

There are significant welfare issues for dogs kept, bred, and born in industrial scale, legal and licenced breeding establishments. More stringent regulation and inspection is required to enhance welfare standards and provide greater protections to mothers and their pups. This will require additional resources for already stretched licencing and animal welfare staff in district councils. Such resources could at least in part be provided through raising the dog breeding licence fees.

The Illegal Puppy Trade

The illegal puppy trade in Northern Ireland is a multi-million pound industry. This report has described the significant harm caused to dogs used for breeding and the puppies that are bred, trafficked, and sold. These poor animals are exploited for criminal profit.

At the end of this supply chain are often heartbroken owners who have bought a cute little puppy, only to discover it has underlying health issues which often lead to death. This human tragedy is largely hidden from us in Northern Ireland as the main focus for these cruel criminals is the lucrative GB market.

The illegal puppy trade is a sophisticated, inter-connected web of criminal activity. There is significant need for targeted and focused enforcement in respect of all groups and individuals involved, the illegal breeders, transporters and dealers. This will require greater resourcing and improved co-operation between all enforcement agencies and other appropriate interested parties.

A number of agencies and departments have statutory duties relevant to the illegal puppy trade. This includes licencing (for breeding and transportation), inspection (at breeding locations and at the ports) and enforcement. None have an overall knowledge of the whole process or the 'bigger picture'. There is a need for governance and formal partnership working in respect of this issue. This could be in the form of a Task Force or similar structure. This will lead to a more joined up approach, improved information sharing, a better knowledge and understanding of the problem and hopefully a more targeted approach in respect of prevention and enforcement activities.

The first step is to recognise the scale and seriousness of the problem.

¹ Independent.ie, <https://www.independent.ie/irish-news/irish-dealers-place-profits-over-welfare-in-trafficking-sick-puppies-to-scotland-40003712.html>

² RSPCA, <https://www.rspca.org.uk/getinvolved/campaign/puppytrade>

³ The Scottish Government, Sourcing of pet dogs from illegal importation and puppy farms 2016 – 2017: scoping research <https://www.gov.scot/publications/scoping-research-sourcing-pet-dogs-illegal-importation-puppy-farms-2016/pages/7/>

⁴ The Scottish Government, Sourcing of pet dogs from illegal importation and puppy farms 2016 – 2017: scoping research <https://www.gov.scot/publications/scoping-research-sourcing-pet-dogs-illegal-importation-puppy-farms-2016/pages/7/>

⁵ ISPCA, https://www.ispca.ie/news/detail/27_dogs_in_ispca_care_after_being_discovered_in_a_van_at_cairnryan_ferry_po

⁶ Independent.ie (24/01/21) <https://www.independent.ie/irish-news/irish-dealers-place-profits-over-welfare-in-trafficking-sick-puppies-to-scotland-40003712.html>



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