



Animal Welfare.
Worldwide.

Puppy breeding and licensing: a postcode lottery of enforcement

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FOREWORD

The production and selling of puppies is a high value business for many operators across the UK. As has been revealed several times, there are breeders and traders who are undermining welfare standards, breaking the law and putting the health of their dogs and puppies in jeopardy which has wider implications for the public. For many years welfare charities like FOUR PAWS UK have raised these concerns and the Government has responded in some way through new regulations, but the problems will never be addressed unless we have effective enforcement and invest in making that work.

For that reason, the All-Party Parliamentary Group for Animal Welfare has prioritised examining the consideration of current resources dedicated to enforcement alongside the lack of consistency and expertise within local authorities and sought solutions. Lower tier authorities took on the Licensing of Activities Involving Animals (2018) Regulations and at that time it was hoped that this would improve animal welfare enforcement across the board. It has, however, become apparent that enforcement varies hugely across the authorities, there is a lack of consistency and not only has animal welfare not improved, but businesses have also been impacted negatively. This new FOUR PAWS report has confirmed that.

Those who want to breed and sell to good standards are undermined by those who are taking advantage of a lucrative market with poor enforcement. Local authorities are certainly not able to seek out unscrupulous breeders and traders, and with the costs and uncertainties around effective enforcement and proceedings, there is a feeling that many local authorities turn a blind eye to the issues. This is not to undermine the excellent work done by some local authority officers who go out of their way to uphold the law and protect animal welfare.

Action needs to be taken to not only deliver on animal welfare, but also to protect the public who are being sold low welfare dogs. Recognising that financial cuts may be impending and there is certainly not likely to be new money, this report sets out some ways in which we can improve the current situation. Many of the recommendations can be done simply by better practices, amending existing legislation, working in partnership, and using qualified, experienced and dedicated animal welfare officers.

The report sets out a pathway to better animal welfare enforcement and we know our sector stands ready to support the actions needed to make this happen. We hope the Government recognises that they can be leaders in animal welfare by taking forward the actions outlined in the report.



Marisa Heath
Director, All-Party Parliamentary Group for Animal Welfare (APGAW),
Co-founder, Local Government Animal Welfare Group



INTRODUCTION

For many people, puppy farming still conjures up images of a small-scale cottage industry, generating a benign additional income for its operators.

But the current reality is very different. The trade has become a multi-million-pound, trans-national industry with UK sales alone worth a minimum of £880 million annually. Up to two million puppies are sold.

Underpinning that breeder-to-buyer transaction are rules, regulations, conditions and obligations that dog breeders must comply with to receive an operating licence from their local authority. These serve to reassure buyers that best-practice animal welfare is in place and give sellers legitimacy and a stamp of approval.

Frontline enforcement of the licensing conditions for legal puppy breeders lies with overstretched local authority licensing officers, the same council employees who license taxis, hypnotists and gambling casinos.^{1,2}

As this report shows, a local authority issued dog breeder licence may not be an assurance of best practice or of expert monitoring and evaluation of good animal welfare.

Using data collected from freedom of information (FOI) requests to all UK local authorities in 2023 and 2024, this report reveals the extent of under-enforcement of the rules surrounding licensed dog breeding and identifies a number of areas where urgent action is required.

The regulations that govern the licensed dog breeding industry and the enforcement of these regulations by UK-wide local authority licensing officers, require immediate reform.

This report has found good, bad, and indifferent approaches to licence enforcement nationally. This lack of consistency means that under some authorities, bad practice is proactively rooted out, while in other areas it flourishes due to a combination of neglect, lack of animal welfare expertise and de-prioritisation. This places animals at risk of harm.

In particular, our findings confirm a troubling ‘postcode lottery’ in enforcement and management practices. Some local authorities approve most or all the applications they receive, perform insufficient inspections, neglect to address complaints, and show minimal punitive enforcement activity, such as licence revocation. Although the Department of Food and Rural Affairs (Defra) recommends the suspension or revocation of licenses in instances of non-compliance with licence conditions, this rarely happens.³

Despite large numbers of public complaints to some local authorities about both legal and illegal dog breeders, the data does not indicate that these result in increased inspection efforts or license enforcement actions. Where these complaints were followed up, the overwhelming response from licensing teams is that complaints were ‘unfounded’ or that no further action was being taken.

The very high approval rates for licence renewals suggest that once a breeder is in the system they will enjoy light-touch scrutiny, with approvals subsequently becoming little more than tick-box exercises. This exposes the significant failings of a system that is enabling inadequate enforcement of the regulations which should be cause for concern.

Licence fees are inconsistent and often do not appear to be set at a sufficient level to cover all the costs required for full licence monitoring and enforcement.

Records of numbers of litters produced annually by licensed breeders are not maintained as a matter of course. Given that this is currently a determining factor in whether a local authority licence is required or not, this would seem a pre-requisite.

Record keeping is also clearly an issue, as the FOUR PAWS UK FOI results on breeder numbers, and numbers of licence revocations and suspensions within individual authorities, showed considerable disparity with the number recorded by Defra, suggesting that record maintenance is inconsistent.⁴

Measures to reform the licensing regulations that underpin UK puppy breeding have had limited success, and the illegal trade has slickly manoeuvred to evade them. A huge unlicensed and off-grid illegal puppy breeding industry exists, around which other criminality converges, including drug dealing, money laundering and even people trafficking.^{5,6}

Tackling this growing trade and its wider associated criminality requires a reassessment and refreshment of the existing regulations, but also a more joined-up approach by the enforcement frontline and specifically our local authority licensing officers.

Defra’s recent post-implementation review of the administration and application of the LAIA regulations reveals a blind-spot in respect of enforcement which is not exclusive to LAIA itself.⁷ Just 2.5% of the UK’s 300,000 farms were inspected by local authorities during 2022 and 2023.⁸ Licensing of the UK’s 2,700 wild animals as pets under the Dangerous Wild Animals Act also falls to local authority officers.

There seems little practical virtue in keeping LAIA distinct from the licensing of activities including animal utilisation (farming) and ownership (dangerous wild animals).

The expertise required in licensing animal activities needs to be recognised as a specialism, for which there are trained, dedicated resources, providing reassurance that licence conditions are being enforced rather than simply administered. Whether as regional hubs of expertise, or aggregated pooling of inter-local authority resources, a single contact, an administration and enforcement body, or one-stop shop, a focus on all animal licensing activities needs to be considered.

With this bolstered frontline in place, higher-level co-ordination is required to share and develop expertise, create standard processes and practices and maximise its potential. Existing models such as those in Wales, focused on enhanced monitoring and increased compliance with licence conditions, can guide the discussion.

As a contribution to the discussion, this report is a detailed analysis evidencing where the system needs to be fixed along with recommendations on how. Some of these recommendations are relatively straightforward low- or zero-cost solutions. Others require an evaluation of the systemic issues within the enforcement regime.

The current lottery of enforcement is an anachronism given how Britain prides itself on the moral imperative of preventing animal suffering. We cannot allow animals to endure neglect in one post code but safeguard them in another or to randomly enable the operation of bad breeders via poor scrutiny in one authority but hold them accountable in the one next door.

Given the deficient oversight revealed by our evidence, manifest in insufficient inspections, lack of response to public complaints and the uneven use of enforcement tools, we do not believe there can be certainty or assurance that licence compliance is being properly evaluated, monitored or addressed.

At present, and with some exceptions, it is not an overstatement to say that the dog breeding licensing system is being administered rather than enforced.

The enforcement of rules created to protect animals from harm or suffering should not be a matter of chance or fortune. Luck should never be a determining factor in the application of good animal welfare.

Sonul Badiani-Hammett
Country Director, FOUR PAWS UK



LICENSING REGULATIONS FOR UK DOG BREEDING

In its 2015 consultation on licensing regulations for activities involving animals, Defra stated that: ‘There is a strong public expectation that animal welfare standards will be robustly enforced by local authorities. However, the laws, and their specific requirements, are often decades old, and difficult to adapt to the changing types of animal-related businesses, and to new standards of good practice in animal welfare.’⁹

The growth of online sales in particular, which had created an enforcement grey area, meant that the existing licensing system was not being consistently enforced.¹⁰

There were also concerns around ‘backstreet dog breeders’ (i.e. small-scale dog breeders who breed dogs in poor welfare conditions for profit), who under the existing legislation could breed up to four litters per year without requiring a licence.¹¹

The result was the LAIA (England) Regulations 2018 (2021 in Scotland and Wales). Already in place was the Welfare of Animals (Dog Breeding Establishments & Miscellaneous Amendments) Regulations (Northern Ireland) 2013, under which anyone in the business of breeding and selling dogs, and/or who bred three or more litters in a twelve-month period, needs to have a valid licence from their local authority.^{12, 13, 14}

The LAIA Regulations introduced an updated licensing system in England (2018), and in Scotland and Wales (2021). It covers five activities involving animals: keeping or training animals for exhibition, selling animals as pets, providing boarding for cats and dogs, hiring out horses and breeding dogs.^{15, 16, 17}

LAIA is administered and enforced by local authorities, which are required by law to issue licences for specific animal-related establishments and activities. The aim is to safeguard the health and welfare of the animals involved through a system which Defra said would be “up to date with modern practices and modern animal welfare standards.”¹⁸

Licences for the five animal-related activities comprise the fourth largest group of business licences issued by local authorities, after premises, taxi and gambling licences.¹⁹ It is a requirement under the English legislation that a suitably qualified person appointed by the local authority undertakes an inspection and produces a written report on receipt of every application for a licence, whether it is new or a renewal.²⁰

LAIA provisions include:

- ▶ A reduction of the licensing threshold for dog breeders to three or more litters per year to ensure that anyone breeding dogs commercially, including backyard breeders, has a licence. (Part 5 – Breeding Dogs. (9)c)
- ▶ The licensing of online businesses, removing any existing ambiguity about their need for a licence.²¹ (Schedule 3)
- ▶ The introduction of a rating system, whereby breeders with a record of maintaining higher welfare standards than those required by the licence would be inspected less frequently and can obtain a two- or three-year licence.^{22, 23} Part 2, Period of Licence (5)
- ▶ A prohibition on the sale of puppies younger than eight weeks. This was amended in April 2020 in England, Scotland, and Wales as a result of Lucy’s Law.²⁴ Now, only licensed breeders can sell puppies under the age of six months.^{25, 26} (Schedule 3, Purchase and Sale of Animals. 5.1(d).)
- ▶ Lucy’s Law also requires a puppy to be shown with his or her mother by breeders prior to sale and purchases need to be completed in the buyer’s presence, at the premises where the dog is kept for sale by the licence holder. (Schedule 6, Advertisements and sales 1(1)a & 1(6).)

As an amendment to devolved legislation, Lucy’s Law has now been introduced in England, Wales, and Scotland and a commitment has been made to introduce it in Northern Ireland.^{27, 28, 29}

Uptake of licence requirements

A Kennel Club survey of UK local authorities found that 980 dog breeding licences were issued prior to the implementation of the LAIA Regulations (between September 2017 and September 2018).³⁰

Following the introduction of the LAIA Regulations in October 2018, this figure nearly doubled to 1,727 licences between April 2019 and April 2020.³¹ This increase was probably due to the introduction of the 2018 English LAIA Regulations, which by dropping threshold from five litters to three, expanded the licensing requirements to include a greater number of small-scale breeders.

Prior to their introduction in 2018, Defra’s impact

assessment predicted that the LAIA Regulations would result in around 5,000 breeders in England alone requiring a licence and that many of these would not previously have been subject to licence conditions.³² The Kennel Club survey showed that the numbers did not reach this level.³³ It is unclear whether this was due to Defra overestimating the scale of dog breeding, or because thousands of breeders simply did not apply, and are continuing to operate without valid licences and therefore illegally.

Battersea Dogs and Cats Home estimated that prior to the introduction of the LAIA Regulations, just 10% of the UK dog breeding industry was licensed.³⁴ The RSPCA now estimates that, post-implementation, that figure has risen to 50%.³⁵ The remaining 50% comprises UK breeders farming puppies without a licence, small-scale hobby breeders who do not require a licence, and those bringing in puppies from the EU commercially, as rescue animals or illegally.

A surge in demand

The COVID-19 lockdown period between March 2020 and March 2021 created unique circumstances around demand for pets and licensing enforcement.

Pets4Homes, the UK’s largest online pet marketplace used by up to seven million people each month, reported that the average price of a puppy in 2019 was £750.^{36, 37} However, due to unanticipated and unmet demand for pet dogs and cats during COVID-19, average puppy prices soared to as much as £2,200 in the first quarter of 2021.³⁸

Online sales, and specifically those using social media platforms, fast became the preferred sales and purchase method, with 65% of all puppies being bought online in 2023.³⁹ Demand continued to be high; in June 2023 over 9,000 dogs were being advertised for sale on Pets4Homes, with each advert attracting around 80 potential buyers competing for every available dog.⁴⁰

Some of the demand was met by the commercial importation of dogs and puppies. According to Defra, in 2020 more than 66,952 dogs were commercially imported into the UK. Of these, 843 puppies were seized at the border, an increase of 260%, or 324 puppies since 2019.⁴¹

European-based breeders capitalised on the domestic supply shortfall during the COVID-19 pandemic and flooded the UK market with puppies, through both legal and illegal channels. These supply streams

continue to flourish.⁴²

FOUR PAWS tracked the number of online ads for dogs during the pandemic, finding that Pets4Homes published over 21,000 ads in November 2021 and giving some indication of the feverish demand for pets during the lockdown period. Gumtree and other platforms showed similar trends, with ad volumes peaking in mid-2021, followed by a decline as restrictions were lifted and the market started stabilising post-2021.

A 2022 investigation by FOUR PAWS found that over half of the puppies described by their purchasers as having had one or more health or behavioural issue, had originally been advertised on social media.⁴³ Additionally, almost a third of the puppies sold when aged under seven weeks were advertised on Instagram, highlighting the danger of unscrupulous

breeders being able to freely advertise on unregulated social media platforms.⁴⁴

LAIA Review

In September 2022, Defra launched a Post Implementation Review (PIR) of the LAIA Regulations which was published in December 2024.^{45, 46} A limited number of areas for improvement were identified, mainly around the administrative burden on licensees and inspectors and need for further support to local authorities so that they could share information and expertise. It is hoped that Defra's current strategy review will be informed by the evidence detailed in this report, which clearly identifies areas in which licensing enforcement is deficient.

In early 2023, the Environment, Food and Rural Affairs

(Efra) Committee launched a call for evidence for an enquiry into pet welfare and abuse, with a specified focus on unscrupulous breeding and importation.⁴⁷ Its 2024 "Pet Welfare & Abuse" report concluded that a more consistent approach to training and accreditation for animal welfare officers is needed and that existing variation in training and enforcement puts animal welfare at risk.⁴⁸

Efra concluded that⁴⁹:

- ▶ 'Animal welfare legislation must be consistently and robustly enforced if it is to achieve its statutory objectives and act as a deterrent to unscrupulous breeders seeking to circumvent the law.' (p23)
- ▶ 'The ability of local authorities to perform key regulatory activities is constrained by a lack of specialist knowledge and training, and inadequate funding and resourcing. This results in an inconsistent approach nationally, and a postcode lottery in terms of levels of understanding and prioritisation of animal welfare issues. If enforcers are unable to meet their statutory duties under LAIA regulations, perpetrators may become emboldened to flout them.' (p23)
- ▶ 'A central unit of suitably trained inspectors should be established which can be utilised by local authorities to improve collaboration and disseminate best practice.' (p23)
- ▶ 'The litter licensing threshold for dog breeding should be reduced from three to two per 12-month period.' (p34)
- ▶ 'A list of all licensed sellers should be publicly available, which would allow for verification and provide assurance to buyers.' (p34)
- ▶ 'The Government should produce clearer guidance for local authority enforcers regarding Section six of LAIA regulations, which prohibit the breeding of dogs where there are reasonable expectations that their genetics or health would lead to welfare problems. This guidance should include a list of breeds for which it is unlikely that a licence would be issued, and exceptional cases in which they might.' (p34)
- ▶ 'The financial situation faced by local authorities is affecting their ability to undertake activities including inspections, kennelling, investigations, and enforcement.' (p36)

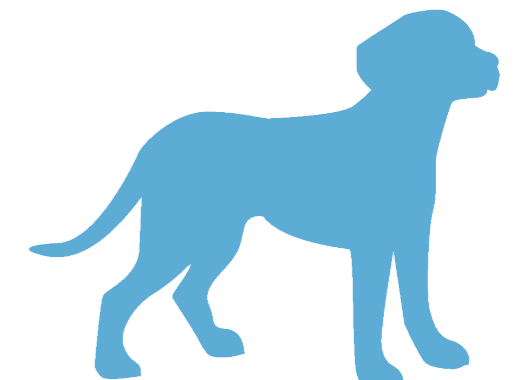
Defra and the devolved parliaments for a trade beset with problems, but the ever-evolving illegal puppy breeding industry has quickly found ways around them.

However, Defra's recent PIR of the LAIA Regulations was a missed opportunity to address a system that is failing the animals it was designed to protect.⁵⁰ There is a distinct absence of quantitative data in the PIR on whether the regulations have improved animal welfare, with analysis instead concentrated on LAIA's operation and costs and implementation from the perspective of licence holders and licensing officers. Many of the Efra report recommendations have been rejected.

It is hoped that the detail provided in this report will give a more quantitative and specific indication of the areas of concern and provide both clarity and evidence on where reform is necessary.



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Freedom of Information (FOI) requests

Overview

Under the LAIA 2018 Regulations (2021 in Scotland and Wales) anyone breeding and selling dogs and/or those who breed three or more litters in a twelve-month period, must have a valid licence from their local authority.

In May 2023 and March 2024, FOUR PAWS UK submitted FOI requests to all UK local authorities, asking for the following information for 2018-2023:

- ▶ Number of licensed breeders
- ▶ Number of annual establishment inspections
- ▶ Numbers of new licence and renewal applications
- ▶ Numbers of licences granted

To explore the level of scrutiny and effort in this area, we also asked for the following information:

- ▶ Number of licences revoked or suspended
- ▶ Litter numbers
- ▶ Complaints received from the public about breeders
- ▶ Number of licensing officers in each authority and their job titles

The first FOI request, submitted in May 2023, asked local authorities for data covering the period January 2018 to May 2023. The second FOI request was submitted in March 2024 to gather the additional data for the whole of 2023.

The FOI did not specifically request information on informal enforcement action, which is often recorded separately from inspections. However, the responses we received contained an inconsistent amalgamation of figures around formal and informal inspections and enforcement actions suggesting they may be reported as one and the same by some authorities. Coupled with the inconsistency in local authority recording and actions this could also distort the figures.

From the most recent FOI information obtained by FOUR PAWS (March 2024), we calculated that in December 2023 there were 2,996 licensed breeders in the UK: 2,506 in England, 199 in Scotland, 241 in Wales and 50 in Northern Ireland.

National statistics based on the FOUR PAWS FOI requests

England

England - Breeder Licences

During the six-year period we investigated (2018 - 2023), there were:

- ▶ 8,151 licence applications made in England
- ▶ Of these, 4,080 were new applications
- ▶ 4,071 of these were renewals
- ▶ 7,458 of the applications were granted
- ▶ 693 of these were refused, or not fulfilled for other reasons
- ▶ 8,889 inspections undertaken

In December 2023 there were:

- ▶ 2,506 licensed breeders in England (representing 83.6% of all licensed UK breeders)
- ▶ 36 local authorities in England with no licensed breeders
- ▶ 120 local authorities with between one and five licensed breeders
- ▶ 63 local authorities with between five and ten licensed breeders
- ▶ Only 28 local authorities had 20 or more licensed breeders

Plymouth City Council and Kings Lynn & West Norfolk did not provide inspection figures. South Oxfordshire did not record inspection numbers between 2019 and 2022. Durham supplied information for 2023 only. Colchester did not provide any information.

Top five local authorities in terms of licensed breeder numbers in England in December 2023 derived from the FOUR PAWS UK 2024 FOI submission



Our findings show that the licence application success rate is very high: overall, these five local authorities granted 92% of all the licence applications (new and renewals). This is mirrored in the national figures for England.

Licence renewal rejections are rare: Fenland rejected only 4 out of 73 applications, Kings Lynn & West Norfolk, 2 out of 114, and Shropshire, just 1 out of 62. The East Riding of Yorkshire has granted every application made in the past five years.

England – New Applications

The LAIA Regulations came into force in England in October 2018. Our research found that the number of new licence applications increased to 1,036 in 2019, from 693 in 2018 – a 49% increase. This was far less than the 5,000 new licences forecast in the Defra impact assessment for England.⁵²

Although 2019 saw a sharp increase in the number of new applications, these numbers dropped in the following years (Figure 1). In fact, the number of new licence applications in 2023 was even lower than that before the LAIA Regulations came into force.

In England, 87.9% of the 4,080 new licence applications were approved between 2018 and 2023. In the same period, Northern Ireland approved 96% of its applications, Scotland 94.2% and Wales, 63%. The remaining 12.1% of English applications were either declined or not seen through to conclusion (e.g. withdrawn or the applicant moved).

England - Licence Renewal Applications

Licence renewal applications in England increased from 313 in 2018 to 965 in 2022, before falling back to 799 in 2023 (Figure 2).

In England, the approval rate for renewal applications from 2018-2023 was 95%, which, although a higher rate than for new applications, was the lowest in the UK. Scotland, Wales and Northern Ireland approved 100% of their applications.

Local authorities with large numbers of licensed breeders, including Cheshire East (36 licensed breeders), Cornwall (42) and Cumberland (Carlisle) (34), granted every renewal application made between 2018 and 2023.

England - Inspections

The LAIA Regulations Part 2, (4) (b) require an inspection “by...suitably qualified inspectors to inspect any premises on which the licensable activity or any part of it is being or is to be carried on.”⁵³

Overall, inspection numbers were almost wholly in line with application numbers (Figure 3). Inspections over and above this statutory minimum requirement were infrequent although responses suggest that this began to change in 2023.

Excluding 2021, local authorities in England have undertaken more inspections than the number of licence applications received, although the number of additional inspections was not substantial. This compares to Scotland (Figure 8) and Northern Ireland

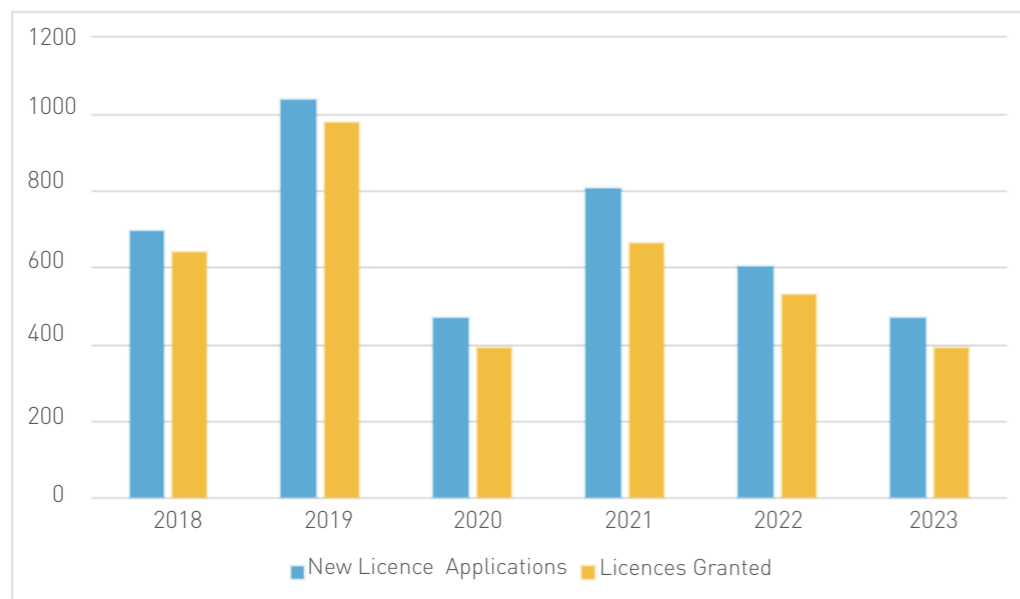


Figure 1: The numbers of new applications and granted applications for dog breeding licenses in England between 2018-2023, as recorded from the FOI requests to all UK local authorities by FOUR PAWS.

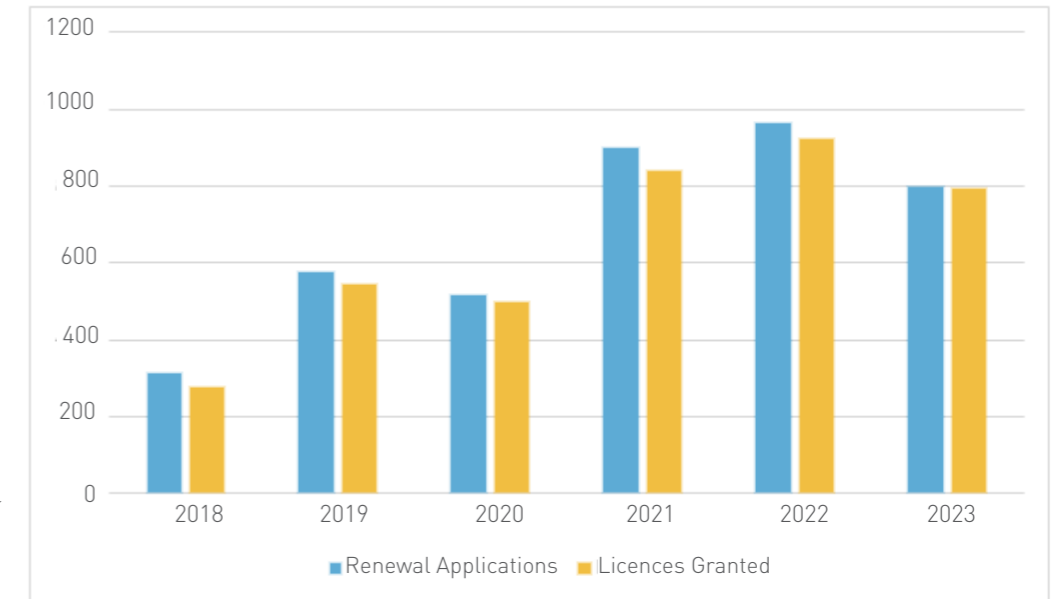


Figure 2: The numbers of renewal applications and granted applications for dog breeding licenses in England between 2018-2023, as recorded from the FOI requests to all UK local authorities by FOUR PAWS.

(Figure 14) where inspection numbers have been consistently lower than licence application numbers.

We analysed the 21 local authorities in England that had 25 or more licensed breeders and that provided full 2018 - 2023 inspection figures. We found that between 2018 and 2023:

- ▶ Eleven local authorities had either identical or very similar inspection and application numbers (new and renewal), suggesting that they had only inspected each new and renewing applicant once.
- ▶ Five local authorities had performed fewer inspections than the number of licence applications they had received, suggesting that some applicants were not inspected.
- ▶ Four local authorities performed more inspections than licence applications, indicating that they had undertaken mid-term or ad hoc inspections.

Breeders can readily assume that inspections will ensue from licence applications, but it appears that only a small number of the local authorities analysed appear to be undertaking additional unannounced or ad hoc inspections.

Analysis of the 2024 FOI returns found that ten authorities had carried out interim and/or unannounced inspections in 2023.

Under the LAIA Regulations, breeders may be granted a licence of up to three years duration, which means that they do not need to be inspected annually.⁵⁴ Analysis of the local authority data returns to Defra for English local authorities in 2024 showed that of the 666 licences for which details were given, 53 were one star (7.9%), 76 were two star (11.4%), 150 were three star (22.5%), 103 were four star (15.4%) and 284 were five star (42.6%).⁵⁵

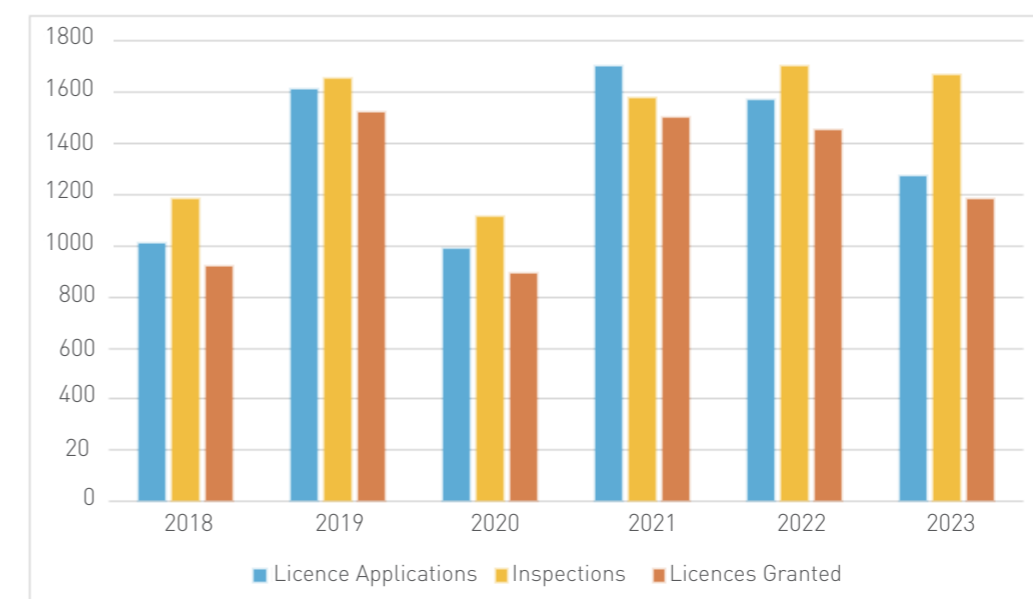


Figure 3: Annual numbers of dog breeding licence applications in England between 2018-2023 compared to total inspection numbers and totals of licences granted, as recorded from the FOI requests to all UK local authorities by FOUR PAWS.

Figure 4; Number of public complaints received by local authorities in England compared with the number of licences issued (both new and renewed) in the years 2018-2023, as recorded from the FOI requests to all UK local authorities by FOUR PAWS.



A breeder with a one- or two-star rating receives a one-year licence and is due one unannounced compliance visit/ inspection annually. Those with three- or four-star ratings receive a two-year licence and one unannounced compliance visit / inspection within two years. Those with a five-star rating receive a three-year licence with one unannounced visit/ inspection within the three years. The Defra figures suggest that 58% of breeders in England will receive no more than one inspection within a two-year period.

This may account for some of the discrepancy in individual years due to some applications spanning two calendar years.

England - Complaints

Our FOI research requested information on the number of complaints received by each authority in respect of dog breeders. Local authorities in England received a total of 4,016 complaints between 2018 and 2023 (Figure 4). However, some authorities told us that they did not distinguish between complaints made about licensed and unlicensed dog breeders, cat breeders or wider LAIA activity such as boarding kennels.

Therefore, the numbers we have for complaints are approximates, based on the information from FOI

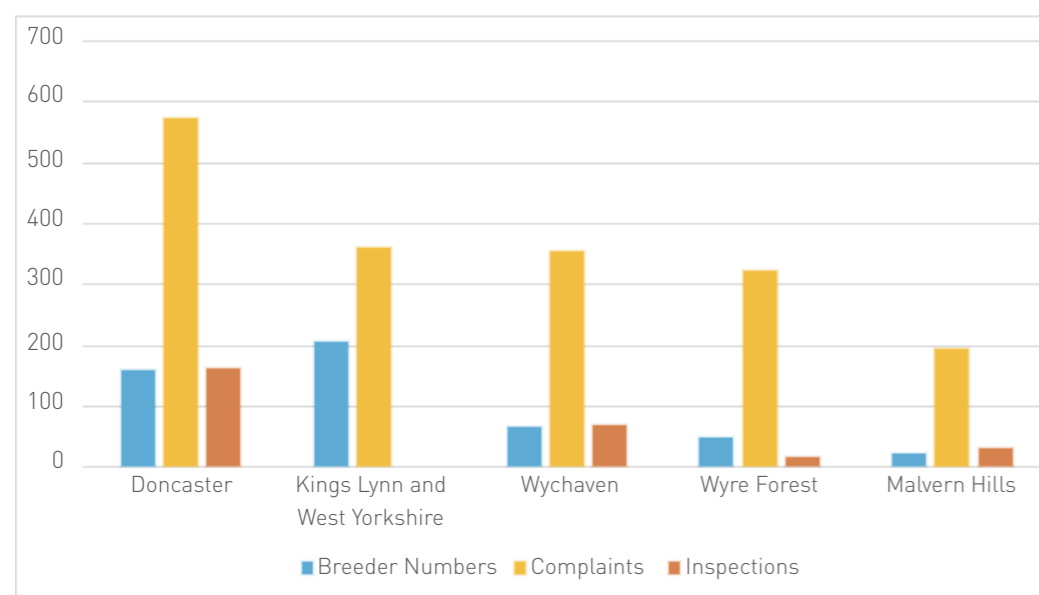


Figure 5: Number of public complaints, licensed breeders, and inspections for the top five local authorities in England between 2018-2023 as recorded from the FOI requests to all UK local authorities by FOUR PAWS.

Note: King's Lynn & West Norfolk (194 complaints) did not provide inspection figures. Doncaster (574 complaints) was unable to distinguish between complaints about dog breeders and those about other LAIA activities, although dog breeders comprised 30% of its LAIA licence holders in 2023.⁵⁶ Malvern Hills (208 complaints) made this distinction for 2023 figures but had not done so previously. All three authorities have been factored out of this analysis.

requests. This inconsistency in reporting by local authorities needs to be addressed to ensure clarity on which LAIA areas are generating concern.

Figure 5 shows that ten local authorities account for 22% (914) of all complaints regarding dog breeding (and potentially some other LAIA-covered areas) made in England between 2018 and 2023.

What is particularly alarming is that the increased numbers of public complaints in these English local authorities, aside from East Riding, Fenland and Basildon, do not equate to increased inspection effort. While public complaints are often about both licensed and unlicensed breeders, there is very little evidence that local authorities increase their efforts by way of response to them.

Some local authorities have a significant number of complaints but very few licensed breeders. Whether these complaints are substantiated or not, this situation suggests two possibilities: either the small number of licensed breeders are potentially non-compliant, leading to these complaints, or there is a high volume of complaints regarding unlicensed breeders that are not being adequately addressed.

Worcester, Wigan, Bromsgrove & Redditch, South Derbyshire, Wyre Forest, Wychavon all with 100-plus complaints, were also factored out as most complaint appeared to be about unlicensed breeders. The total number of complaints (2,985) for the 19 authorities was 74.3% of the total number made in England between 2018 and 2023.

England - Licence Revocations or Suspensions

We asked local authorities how many licences they had suspended or revoked between 2018 and 2023. In England, there were a reported 28 licence suspensions or revocations out of 7,479 issued licenses, nine of which were in 2023. However, the Defra figures for 2023 report only four revoked licences, and no suspensions between April 2023 and March 2024.⁵⁷

Where reasons were given for the revocations and suspensions identified by our FOI, they included failure to comply with licence conditions, not being a fit and proper person to operate a licensable activity, exceeding breeding limit, breaching regulations, chronic neglect, supply of false or misleading information, a criminal conviction, and poor standards. Two licences were revoked simply because the breeder had moved out of the authority area.

The local authority LAIA data returns to Defra from England in 2023 reported that 54 dog breeding licences had been subject to variation, reasons for which can include non-compliance with licence conditions, increasing kennel capacity and replacing accommodation.⁵⁸ There were five licence variations in both Bolton and Leeds.

England - Licence Fees

In England, licence fees vary significantly, from £1,000 in Guildford, £835 in Bath and North East Somerset, to £86 in North West Leicestershire and £58 in Somerset North.⁵⁹

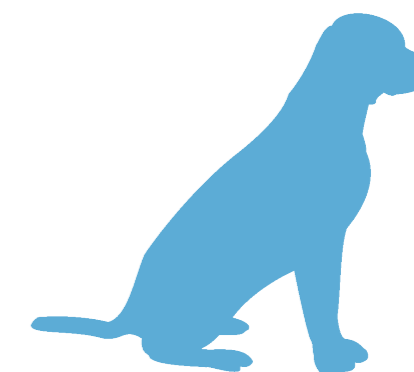
Local authority figures supplied to Defra

Since 2020, Defra has annually requested LAIA data from local authorities in England on breeder numbers and licence fees.⁶⁰ In 2024 it asked additional questions around numbers of licences suspended, revoked or refused.

Defra's tally for the number of licensed breeders in England in April 2024 is 2,224, which is 282 lower than the FOUR PAWS figure from December 2023.⁶¹

In the twelve months to 1 April 2024, the local authority returns to Defra showed that just five licenses were refused, that four were revoked and that none were suspended. It is not possible to directly compare this figure with the FOUR PAWS FOI (which covered January-December 2023) but our data recorded 90 licence refusals, and seven licences revoked during 2023.

It is unclear why there is such a disparity in these figures, but the findings suggest that data is either not being recorded or reported uniformly.



Scotland

Scotland - Overview of Breeder Licences

During the six-year period we investigated (2018-2023), there were:

- ▶ 882 licence applications made in Scotland
- ▶ 220 of these were new applications
- ▶ 662 of these were renewals
- ▶ 872 of the applications were granted
- ▶ 10 were refused, or not fulfilled for other reasons
- ▶ 764 inspections were undertaken⁶²

In 2023, there were:

- ▶ 211 licensed breeders in Scotland (representing 6.9% of all 3017 licensed UK breeders)
- ▶ Half (105) of them were in just five of Scotland's 35 local authorities
- ▶ Ten local authorities in Scotland had no licensed breeders at all
- ▶ 19 local authorities had between one and five licensed breeders
- ▶ Four local authorities had between five and ten licensed breeders
- ▶ Three local authorities had 20-plus licensed breeders



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2016 figures are licensed breeder numbers from Battersea Dogs and Cats Home FOI survey in 2016.

Top five local authorities in terms of licensed breeder numbers in Scotland in December 2023 derived from the FOUR PAWS UK 2024 FOI submission.

Total applications, complaints and inspections are numbers from 2018-2023.

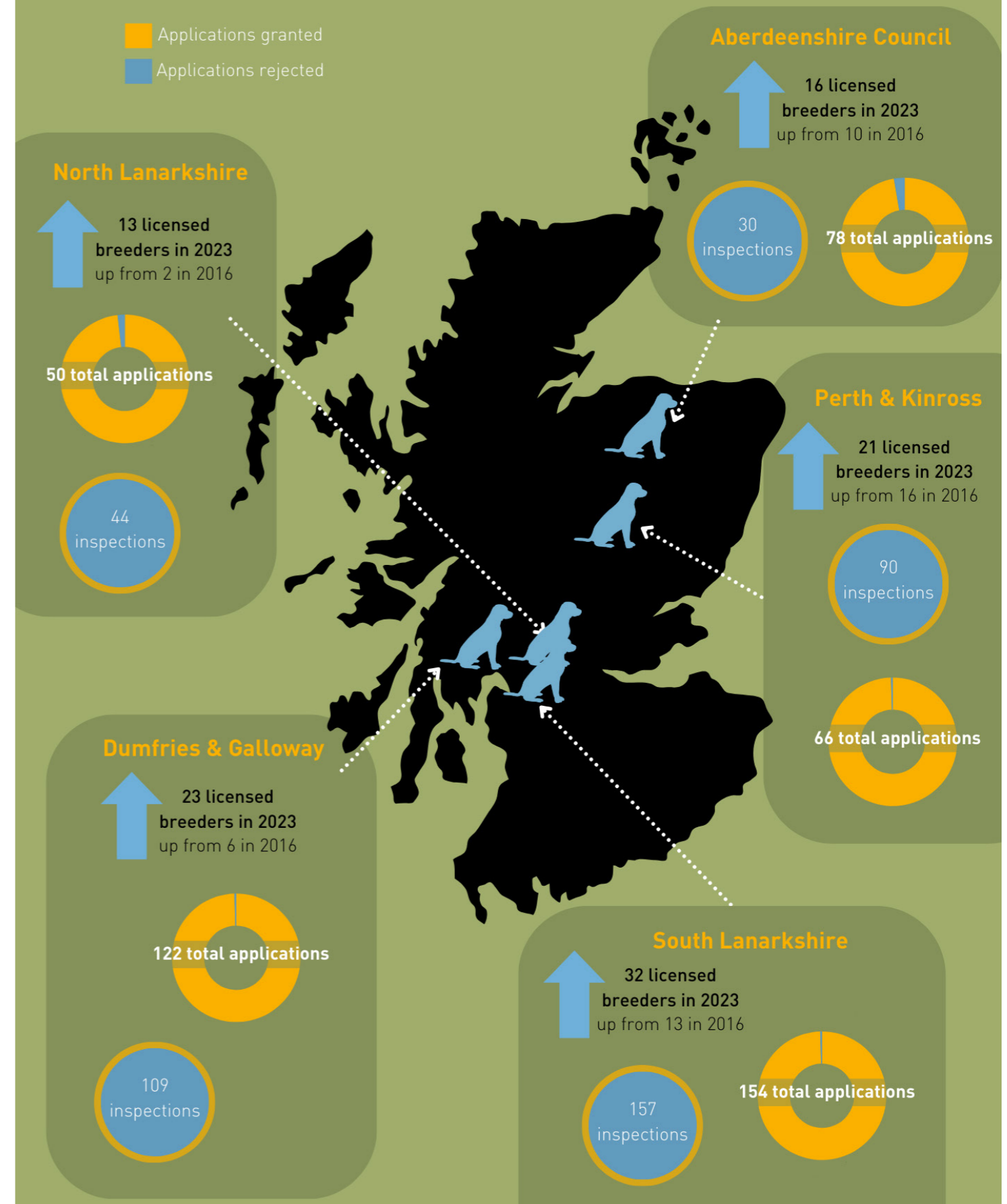
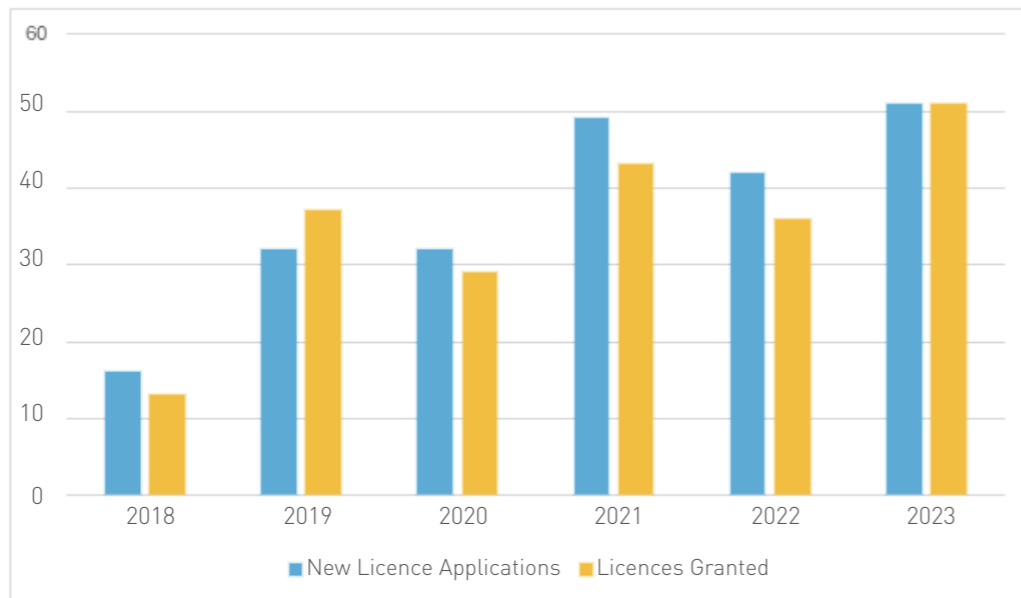


Figure 6: The numbers of new applications and granted applications for dog breeding licenses in Scotland between 2018-2023, as recorded from the FOI requests to all UK local authorities by FOUR PAWS.



Our findings show a very high approval rate for dog breeding licence applications in Scotland. For example, in the top five local authorities, which represent half of Scotland’s licensed breeders, 99.7% of new and renewed licence applications were approved during this time. This means that only three (0.2%) of the applications were rejected. However, there is disparity across different local authorities (see below.)

Scotland – New Applications

The LAIA regulations came into force in Scotland in September 2021. Consequently, results from the FOI reported an increase in new licence applications during 2021 and 2022 (Figure 6). In particular, the total number of new applications in Scotland increased from 32 in 2020 to 49 in 2021 and 42 in 2022.

Between 2018 and 2023, 13 applications for new licences (or 5.8% of the 222 applications) were

declined by Scottish local authorities or withdrawn by the applicants. This means that overall, Scotland has the second highest approval rate (94.2%) in the UK, compared with 96% in Northern Ireland, 87.9% in England, and 63% in Wales.

Scotland – Licence Renewal Applications

The number of licence renewal applications in Scotland increased from 53 in 2018 to 140 in 2022 followed by a small decrease to 139 in 2023 (Figure 7).

According to our FOI responses, the number of approved renewals exceeds the number of renewal applications in 2018, 2019 and 2020. The reason for this is unclear, although it may represent a lag from end-of-year applications made in the previous year.

Compared to the 94.2% approval rate in Scotland for all new licence applications, 100% of the 660 renewal

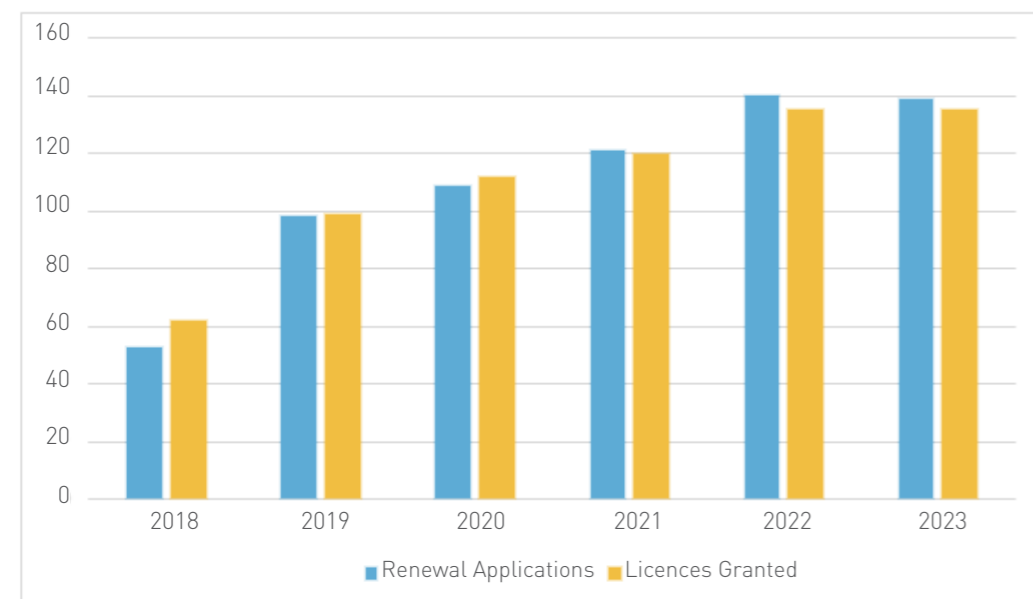
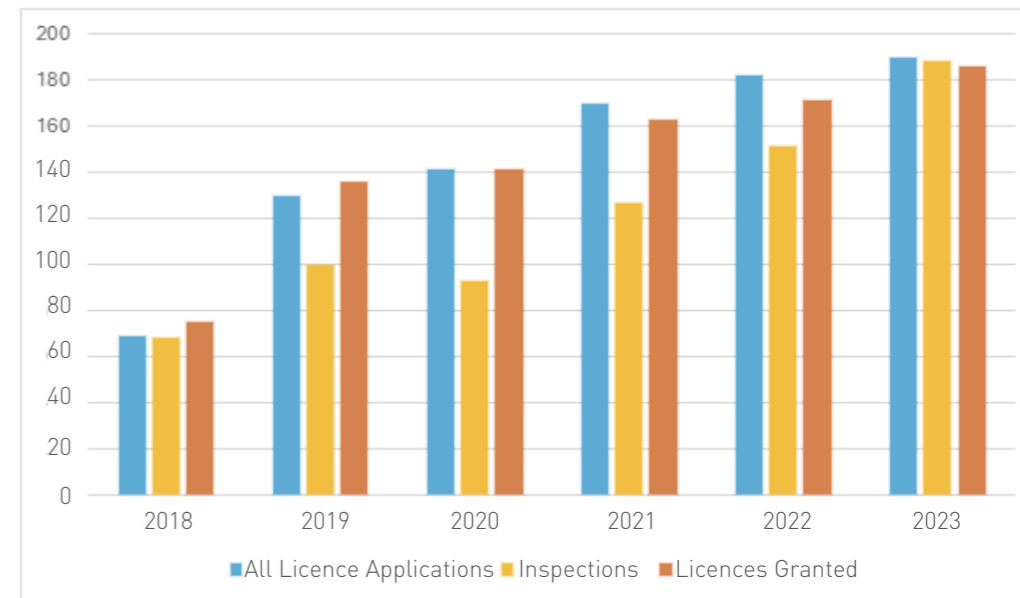


Figure 7: The numbers of renewal applications and granted applications for dog breeding licenses in Scotland between 2018-2023, as recorded from the FOI requests to all UK local authorities by FOUR PAWS.

Figure 8: Annual numbers of licence applications in Scotland between 2018-2023 compared to total inspection numbers and totals of licences granted as recorded from the FOI requests to all UK local authorities by FOUR PAWS.



applications made between 2018 and 2023 were granted (663 in total) equalling approval rates in Wales and Northern Ireland. England approved 95% of all renewal applications.

Scotland - Inspections

Scotland introduced LAIA regulations in 2021, requiring that an inspection must be made for each new or renewal application.⁶⁵ However, our FOI research found that the number of annual inspections undertaken in Scotland has been consistently lower than the number

of licence applications granted in every year since 2018 (Figure 8). For example, in 2022, there were 182 applications, 171 of which were granted. Yet only 151 inspections were undertaken.

Under Scotland’s LAIA regulations, breeders may be granted a licence for between one and three years.⁶⁶ They will undergo a statutory inspection, but if their application is approved, will then only be subject to a single unannounced inspection over the lifetime of their licence. This will account for some of the discrepancy in individual years due to some



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licence periods spanning two or three calendar years. However, over the six years reported, we found that a total of 872 licences were granted, but only 727 inspections undertaken, meaning that 145 (16%) of applicants were not inspected.

Furthermore, allowing breeders to hold a licence for three years could also mean that some go off the radar after just one inspection. If this co-occurred with a lowering of welfare standards, such a change might not be recognised until the licence came up for renewal.

It is clear from our FOI research that inspections in Scotland are not taking place at the level they should be.

This is concerning because not only will some breeders be falling through the cracks, but it also means they are unlikely to receive any ad-hoc or mid-term inspections, which would otherwise help to ensure consistent approaches to good welfare.

Scotland – Complaints

There were just 58 complaints to local authorities about dog breeding between 2018 and 2023, with 33 of these in 2023.

Local authorities reported the following enforcement responses to the 2023 complaints:

- ▶ 13 complaints were followed up with advice and improvement notices
- ▶ 17 were said to be unfounded or unevicenced, or in relation to unlicensed breeders, former licence holders or issues other than animal welfare (dogs barking).

Scotland – Licence Revocations or Suspensions

According to the results from the FOI survey, just three licences were revoked or suspended in Scotland between 2018 and 2023, out of 903 licences. One was a result of criminal conviction, another because the breeder was no longer considered a fit and proper person to hold a licence. The reason for the third was not disclosed.

One authority confirmed that it had revoked licences but declined to say when and how many.

Scotland – Licence Fees

Information provided to FOUR PAWS showed that licence fees in Scotland vary significantly from £117 in South Ayrshire to £467 in West Dunbartonshire.

Wales

Wales – Overview of Breeder Licences

The following figures are based on 21 Welsh local authorities.⁶⁷

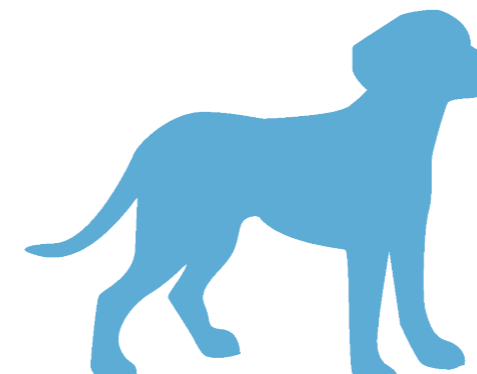
During the six-year period we investigated (2018-2023), there were:

- ▶ 1341 licence applications made in Wales
- ▶ 309 of these were new applications
- ▶ 1032 of these were renewals
- ▶ 1295 of the applications were granted
- ▶ 263 of these were refused, or not fulfilled for other reasons
- ▶ 1533 inspections were performed^{lxvi}

In 2023, there were:

- ▶ 241 licensed breeders in Wales (representing 7.9% of all licensed UK breeders)
- ▶ 157 (64%) of them were based in just four of the 22 Welsh local authorities
- ▶ One local authority (Blaenau Gwent) had no licensed breeders at all
- ▶ Seven local authorities had between 1-5 licensed breeders
- ▶ Six local authorities had between 5-10 licensed breeders
- ▶ Four local authorities had 20-plus licensed breeders

The Animal Health and Welfare Framework Group (AHWFG) review in March 2021 found that in 2019 there were 260 licensed dog breeders in Wales, three of which were licensed for more than 100 breeding bitches.⁶⁹ The AHWFG estimated that these licensed breeding establishments produced between 16,000 and 25,000 puppies per year.⁷⁰ This equates to 2-3% of the estimated 750,000 dogs required to maintain the UK dog population annually, and to 20%-50% of the estimated 50,000-75,000 puppies bred in Wales annually.⁷¹



In June 2020, the Welsh Government provided three-years' worth of funding for the Dog Breeding Enforcement Project (now the Animal Licensing Wales project), involving multiple agencies to improve enforcement powers for local authorities.⁷² This has now been extended to 2025 following positive feedback from local authorities.⁷³

Ahead of its creation, the Welsh Government said that its objective was to;

“develop a consistent approach to applying licence conditions, inspections and enforcement and maximise the potential to maintain performance and levels of service. It (the project) encourages sharing of expertise to provide better resilience and flexibility to consumers (i.e. prospective puppy purchasers) and dog breeding businesses alike. The project includes the development of a regional dog breeding intelligence strategy to increase effectiveness in fighting and preventing illegal and unlicensed dog breeders.

“The project also seeks to develop consistency in the dog breeding industry, which will ensure improvements to the health and welfare of dogs, and puppies in Wales. This will also help improve the reputation of the dog breeding industry in Wales.”⁷⁴

In response to an FOI to the Welsh Government in November 2023 it was reported that:

“As well as a regional investigation team, the funding provided an online information system, intelligence reporting, education and campaigns, the standardising of documentation and inspections across Local Authorities in Wales, training for all Local Authorities in Wales and the introduction of a level 3 qualification for inspection officers.”⁷⁵

The FOI reported that by the end of Year 3, a total of 63 officers across all local authorities in Wales had undergone training, with eight of these officers completing the additional requirements to meet the qualification for pet sellers. Eleven regional enforcement officers, two support officers and two system co-ordinators had been trained and taken up posts.

Operating together and providing a consistent and joined-up service to local authorities across Wales, the resource has reportedly improve the ▶

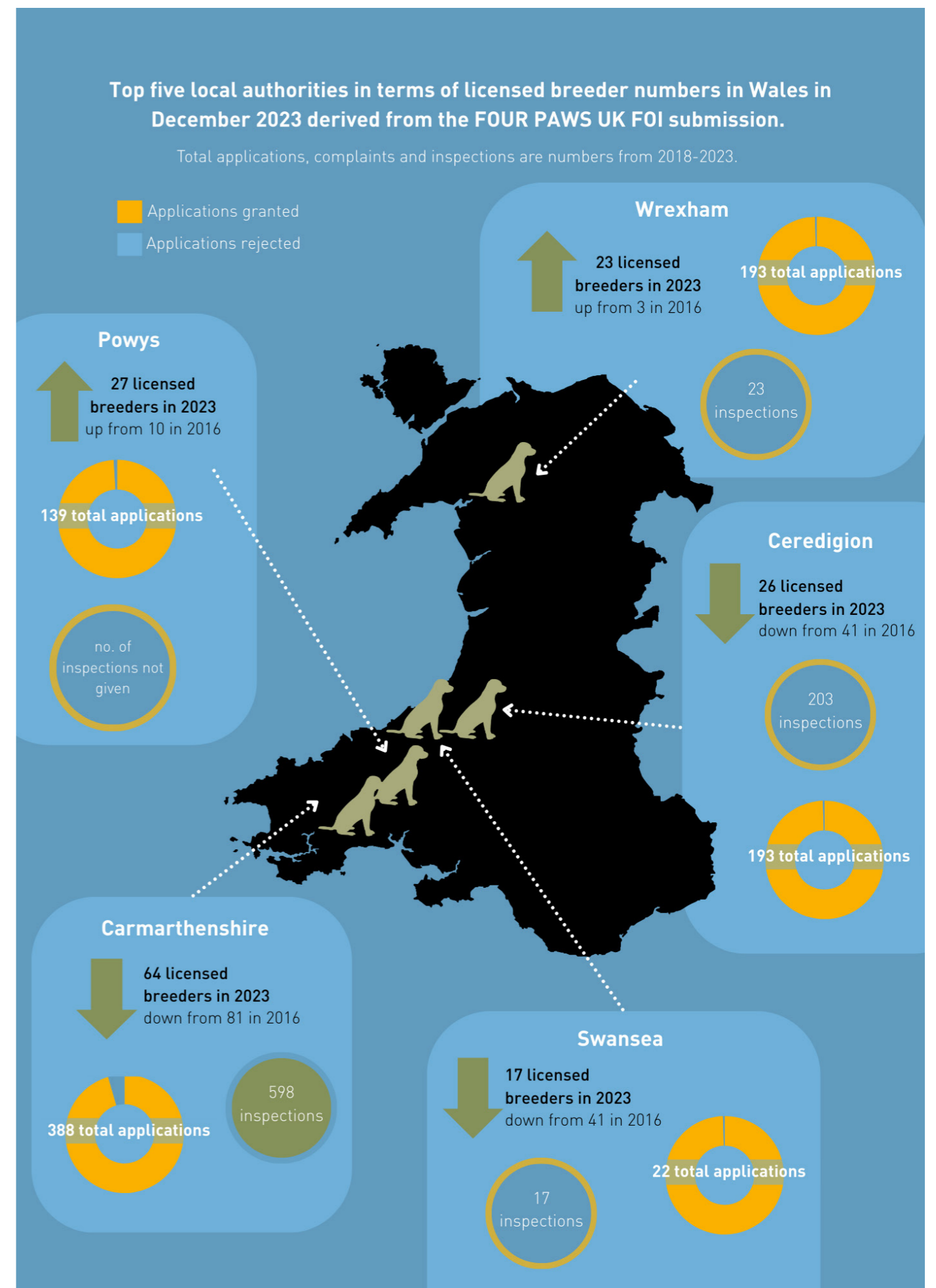


quality and number of inspections, resulting in both increased compliance by breeders and prosecutions for non-compliance.

Between February and December 2023, the team undertook 391 inspections across eight local authorities leading to 58 statutory improvement notices under the Animal Welfare Act 2006 being served.⁷⁶ The number of inspections aligns closely with our own figures shown in Figure 11.

The multi-agency taskforce and its effectiveness has been highlighted by Efra, APGAW and animal welfare NGOs as being a model that other home nations should follow.

The increased effort appears to reflect a wider step-change by the authorities in Wales to address deficiencies in the enforcement system for licensed breeders as well as to tackle the established illegal industry.^{77,78}

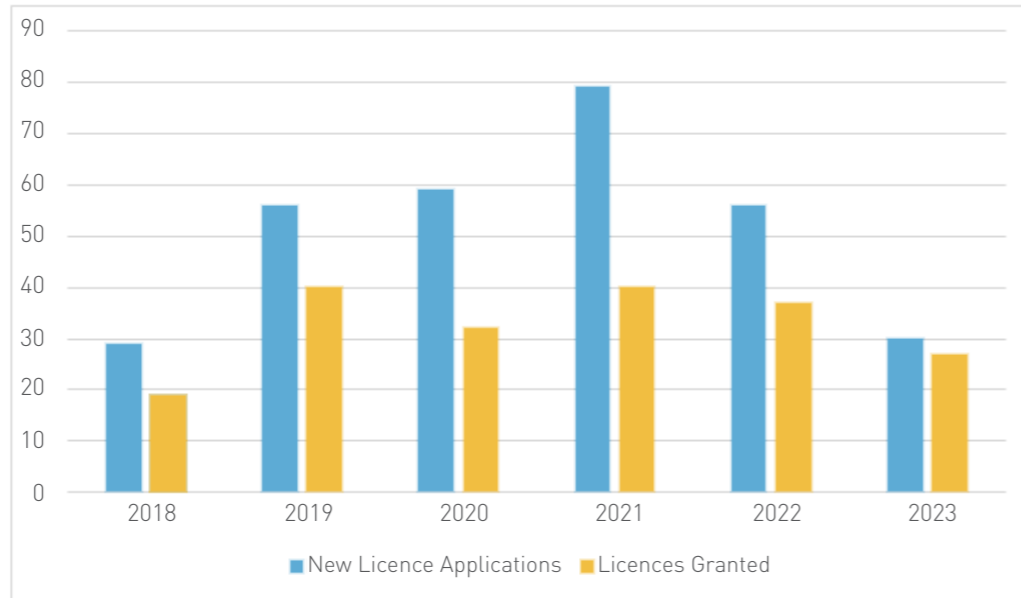


2016 figures are licensed breeder numbers from Battersea Dogs and Cats Home FOI survey in 2016.

* 2022 and 2023 figures only

^Only figure supplied is combined total number of licenses issued/approved

Figure 9: The numbers of new applications and granted applications for dog breeding licenses in Wales between 2018-2023, as recorded from the FOI requests to all UK local authorities by FOUR PAWS.



Between 2018 and 2023, the five Welsh local authorities with the greatest numbers of licensed breeders, who represent 64% of all licensed breeders in Wales, granted 100% of licence renewal applications and 89.6% of new licence applications.

Wales – New Applications

The introduction of the LAIA Regulations in 2021 led to a 33% rise in licence applications, with 79 applications submitted in 2021 compared to 59 in 2020 (Figure 9).

According to our research, between 2018 and 2023 the approval rate for new licences in Wales was 63%, which is the lowest in the UK. Northern Ireland had the highest rate at 96.2%, the rate in Scotland was 94.2% and in England 89%.

There were 114 applications for new licences (36.7% of the 310 total applications) declined or rejected by local

authorities in Wales or withdrawn by the applicants. In 2021, just 40 new licences were granted out of 79 applications, an approval rate of 50%.

Wales – Licence Renewal Applications

The number of granted licence renewals in Wales, increased by 223% from 65 in 2018 to 210 in 2023 (Figure 10).

Figure 10 shows that more renewal applications were granted each year, than there were renewal applications. Overall, there were 1,024 applications, and apparently 1,092 licences were granted.

The reason for this is unclear, although like Scotland, it may partly be a result of renewal applications being submitted at the end of a calendar year and being granted the following year, thereby falling outside our data collection period.

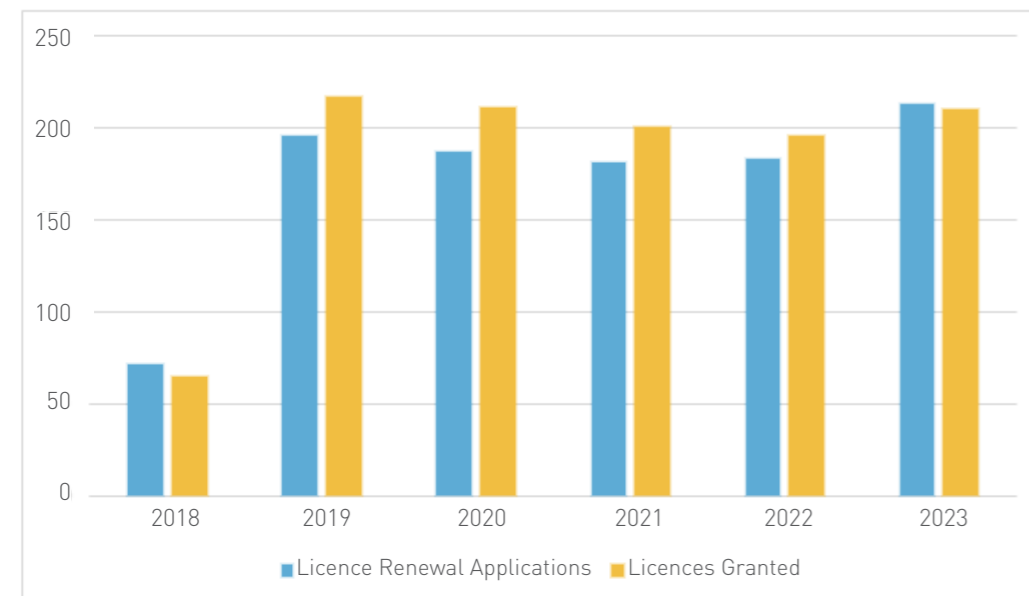


Figure 10: The numbers of renewal applications and granted applications for dog breeding licenses in Wales between 2018-2023, as recorded from the FOI requests to all UK local authorities by FOUR PAWS.

The approval rate for licence renewals in Wales is therefore 106.3%. In Northern Ireland and Scotland it is 100% and in England it is 95%.

The approval rate for licence renewals is therefore 106.3%, which is followed by Northern Ireland (100%), Scotland (100%) and England (95%).

Wales – Inspections

Excluding 2018 and 2023, there is close alignment between the number of applications, inspections and numbers of licences issued. In 2019 and 2022, there were fewer inspections than applications, which may be partly due to applications spanning two calendar years.

Overall, between 2018 and 2023, there were a reported 1287 licences granted, and 1533 inspections carried out. As can be seen in Figure 11, in 2018 and 2023 the number of inspections far exceeded the number of licence applications.

Inspection numbers peaked in 2023, when there was a considerable increase on previous years. This is partly due to the specific actions of two of the local authorities.

For instance, in 2023, Carmarthenshire performed 159 inspections and received 65 applications (a rate of 2.4 inspections per application). The previous year the authority undertook just 32 inspections and yet received 74 applications (a rate of 0.4 inspections per applicant). Also in 2023, Powys undertook an unannounced inspection on each of its 27 licensed breeders.

There were 58 improvement notices issued between February and December 2023, seemingly as a consequence of the programme of this increased enforcement activity and inspections.⁷⁹ It is not known if these were issued to 58 different breeders or are multiple notices issued to a smaller number.

Wales – Complaints

Of the 449 complaints made to Welsh local authorities between 2018 and 2023, 387 were in Carmarthenshire, 75 in Ceredigion and 50 in Vale of Glamorgan, representing 86.1% of the total number of complaints in Wales.

In response to the FOUR PAWS UK 2024 FOI survey, local authorities in Wales provided a higher level of detail on how complaints were dealt with or resolved compared to their responses to the FOI covering 2018 to 2022.

The local authorities reported that they responded to 2023 complaints by providing advice and improvement notices as follows:

- ▶ Unspecified complaints (13): no further action taken (10): ongoing investigation (4): enforcement notice served (1): advice provided (3): inspection and three-month licence issued (2): advised complainant to contact Fair Trading / advised as a civil matter (2): licence refused (1): former licence holder or licence holder moved to another authority (3).

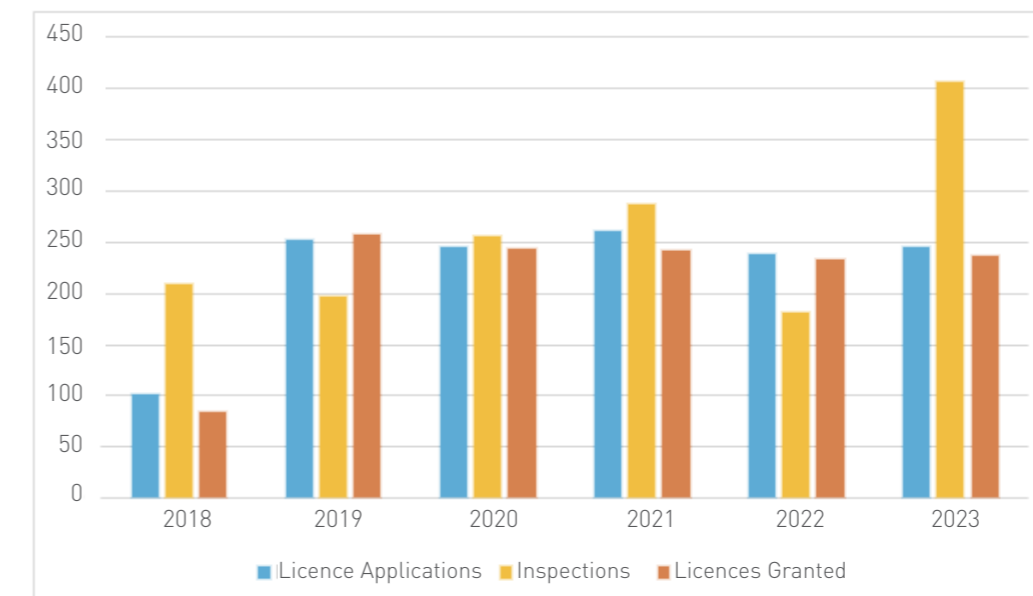


Figure 11: Annual numbers of licence applications in Wales between 2018-2023 compared to total inspection numbers and totals of licences granted as recorded from the FOI requests to all UK local authorities by FOUR PAWS.



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Inspection numbers (406) relative to complaint numbers (39) in 2023 were notably higher than previous years (2022: 181 inspections/32 complaints; 2021: 286 inspections/69 complaints).

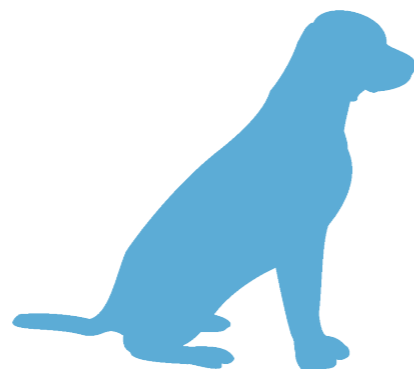
Wales – Licence Revocations or Suspensions

Between 2018 and 2023 there were just three licence revocations in Wales: one in Caerphilly and two in Flintshire.

In 2023, 58 improvement notices were issued in Wales. If these were issued to 58 individual breeders (rather than multiple notices to a smaller number), it would mean that nearly a quarter of all licensed breeders in Wales were found to be non-compliant with their licence conditions in some respect.⁸⁰

Wales – Licence Fees

Information provided to FOUR PAWS via the FOI shows that in Wales, licence fees vary significantly, from £120 for Rhondda to £370 for Blaenau. Blaenau is the only local authority in Wales with no licensed breeders.



Northern Ireland

Northern Ireland - Overview of Breeder Licences

In 2023, there were:

- ▶ 50 licensed breeders in Northern Ireland (representing 1.6% of all licensed UK breeders)
- ▶ 41 (82%) were located in just five of Northern Ireland's 11 local authorities
- ▶ Three local authorities in Northern Ireland had no licensed breeders at all
- ▶ Two local authorities had between 1-5 licensed breeders
- ▶ Five local authorities had between 5-10 licensed breeders
- ▶ One local authority had 10+ licensed breeders

All data from Northern Ireland is from 2019 onwards. During the five-year period we investigated (2019-2023), there were:

- ▶ 322 licence applications made in Northern Ireland
- ▶ 89 of these were new applications
- ▶ 233 of these were renewals
- ▶ 318 of the applications were granted
- ▶ Four applications were refused, or not fulfilled for other reasons
- ▶ 238 inspections were undertaken

In August 2023, The Irish Times reported that the licensed puppy breeding industry in Northern Ireland was worth £23 million annually, with half that figure generated by the nine breeders in Fermanagh & Omagh.⁸¹ A single Fermanagh & Omagh breeder was recorded as having 350 breeding bitches. In total, 1,300 breeding dogs were located in that one local authority. The three largest dog breeding businesses in the UK are located in this local authority.⁸²

In December 2024, Agriculture, Environment and Rural Affairs Minister Andrew Muir said that it was his "ambition to commission a comprehensive expert review of dog breeding licensing".⁸³

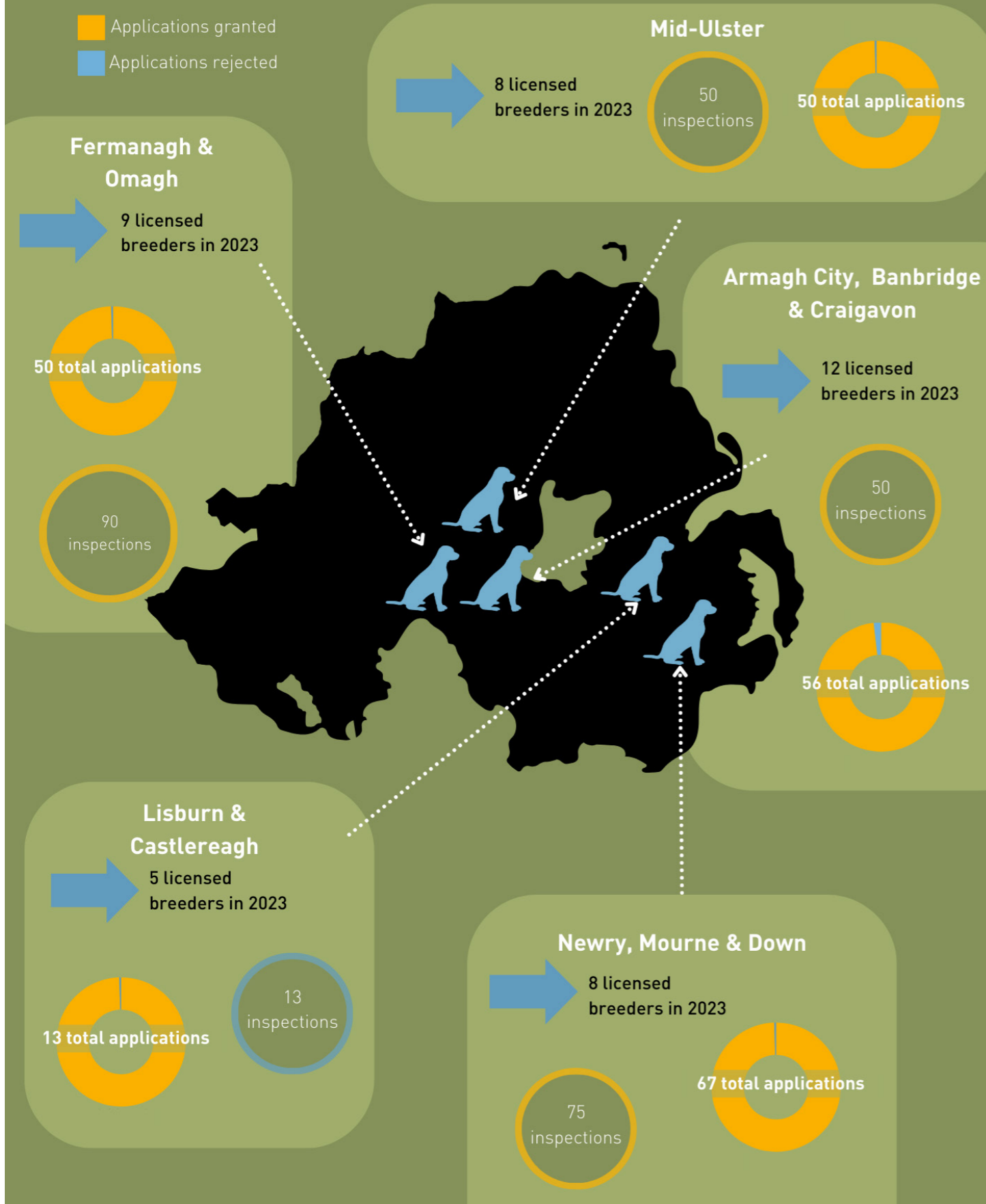


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Top five Northern Ireland local authorities with largest number of licensed breeders (2019-2023). Data only provided from 2019 onwards.

Total applications, complaints and inspections are numbers from 2018-2023.

Applications granted
Applications rejected



Northern Ireland – New Applications

Northern Ireland updated its national dog breeding licensing requirements in 2013 foreshadowing the subsequent LAIA Regulations in England, Scotland and Wales. Our FOI survey results show that there was a surge in new applications in 2021 (Figure 12).

Northern Ireland has the highest approval rate in the UK for new licences, at 95.5%, compared with 94.2% in Scotland, 87.9% in England, and 63% in Wales. Between 2019 and 2023, just four new licence applications were declined out of 89 applications.

Northern Ireland – Licence Renewal Applications

Between 2019 and 2023, local authorities in Northern Ireland approved 100% of the 233 licence renewal applications (Figure 13). This is an approval rate similar to that of Wales (106.3%) and Scotland (100%). England approved 89% of renewal applications.

Northern Ireland - Inspections

Fermanagh & Omagh undertook two inspections annually for each of its registered breeders between 2019 and 2023.

Excluding 2023, there is a large disparity between the number of inspections undertaken and the number of licence applications and approvals in Northern Ireland (Figure 14). It is a statutory requirement that each licence application, either new or renewal, results in a

mandatory inspection, but it does not appear that this is being followed in Northern Ireland.⁸⁴

Northern Ireland – Complaints

Between 2019 and 2023, 54 complaints were made to local authorities in Northern Ireland about dog breeders. The majority of these (36 or 73%) were in Armagh City, Banbridge and Craigavon (a single local authority).

In 2023, there were a total of 16 complaints in Northern Ireland. These included origin of puppies, transfer of puppies, kennel conditions, record keeping and allegations of unlicensed puppy farming. These were followed up in all instances, but no formal action was considered necessary.

Northern Ireland – Licence Revocations or Suspensions

No details were supplied of any licence suspensions or revocations in Northern Ireland.

In May 2024, the Belfast Newsletter reported that councils in Northern Ireland were planning to launch a judicial review of the decision by the Stormont Department of Agriculture, Environment and Rural Affairs (DAERA) to cut all funding for animal welfare work.⁸⁵ This meant that the eleven councils lost all of their funding – a total of £1.25 million for 2023/24 on work dedicated to protecting and saving neglected and abused pets, but despite this they were advised by DAERA that they still had to undertake the work.⁸⁶

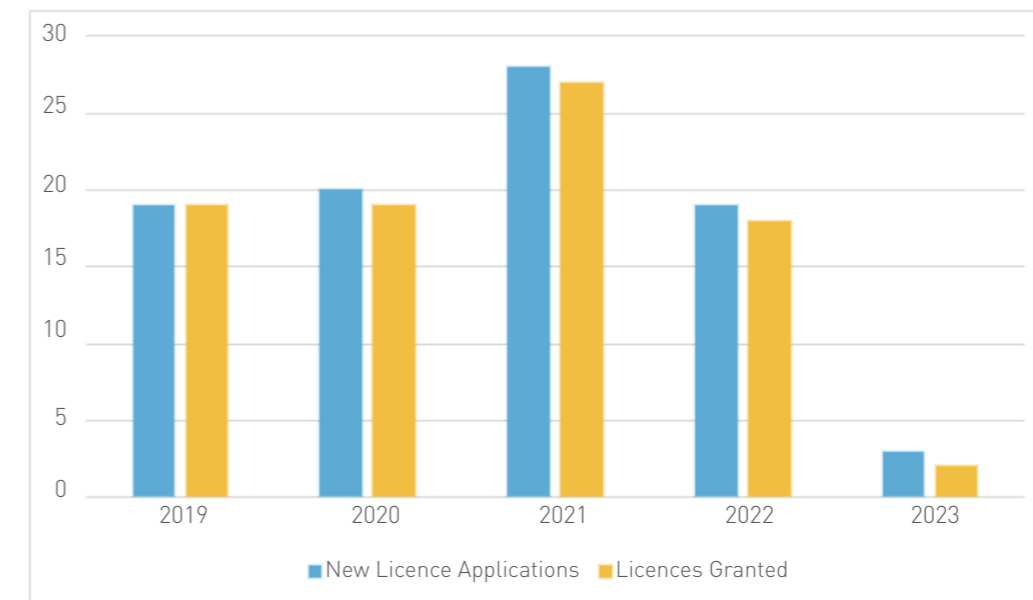
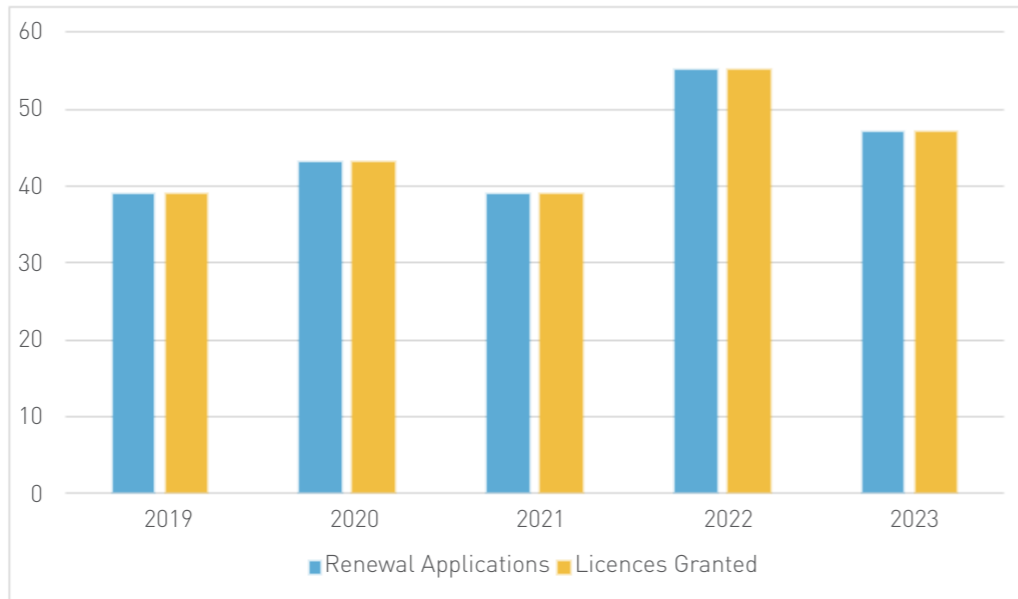


Figure 12: The numbers of new applications and granted applications for dog breeding licenses in Northern Ireland between 2019-2023, as recorded from the FOI requests to all UK local authorities by FOUR PAWS.

¹ Northern Ireland councils to continue legal action against Stormont over end to animal welfare support [newsletter.co.uk]

Figure 13: The numbers of renewal applications and granted applications for dog breeding licenses in Northern Ireland between 2018-2023, as recorded from the FOI requests to all UK local authorities by FOUR PAWS.



This budget was the principal means by which prosecutions could be undertaken against pet abusers, puppy farmers and smugglers, leaving councils under resourced to take on prosecutions. DAERA then offered a one-off back payment totalling £625,000 but the councils decide to progress a judicial review of the cut.

A cut of this magnitude can only have a negative effect on the ability of local authorities to undertake enforcement activities and actions in the interest of animal welfare, particularly given the pre-existing lack of inspection effort relative to licence applications.

Northern Ireland – Licence Fees

Information provided to FOUR PAWS via the FOI indicated that Northern Ireland licence fee costs were a uniform £150 for up to ten breeding bitches, £200 for between 11 and 25 and £350 for 200 bitches, plus £50 for every additional 100 bitches.

Speaking to The Irish News in August 2023, Tara Cunningham, Manager of Causeway Coast Dog Rescue said: “Our calculations suggest councils have secured less than £11k of invoicing from the 50 breeding licences, while those breeders (take in) an estimated £26 million.”⁸⁷

This £11,000 of total income from Northern Irish dog breeding licence fees represents an average local authority budget income of £220 per breeder, which would seem to be inadequate given the large numbers of animals at some breeding centres. As already noted, a single local authority in Northern Ireland is home to the three largest breeders in the UK who have 1,300 breeding dogs, yet there are just three enforcement officers undertaking the whole spectrum of licensing activity. This cannot be a ratio that is sufficient to ensure good welfare.

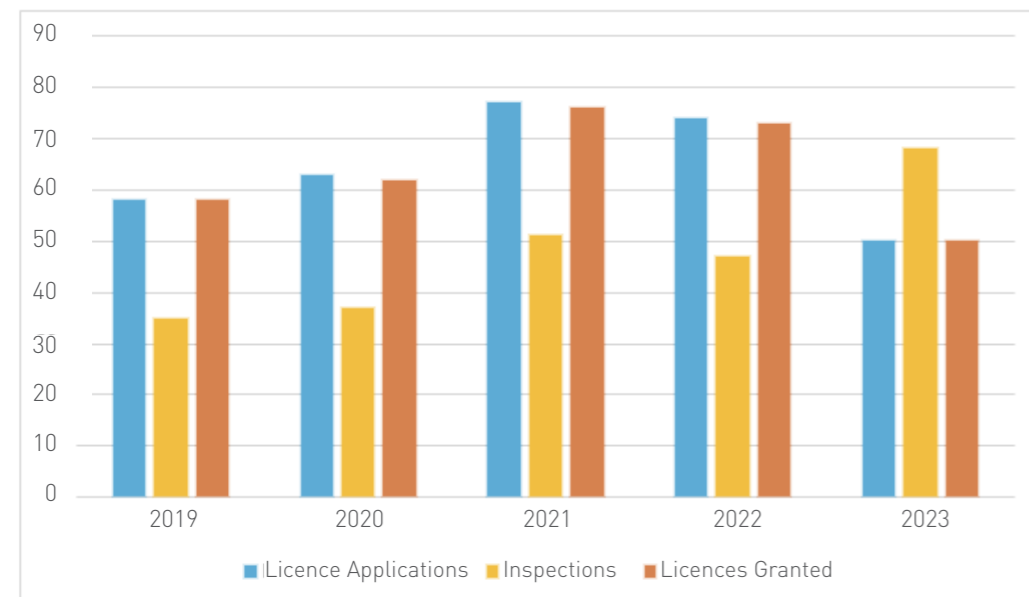
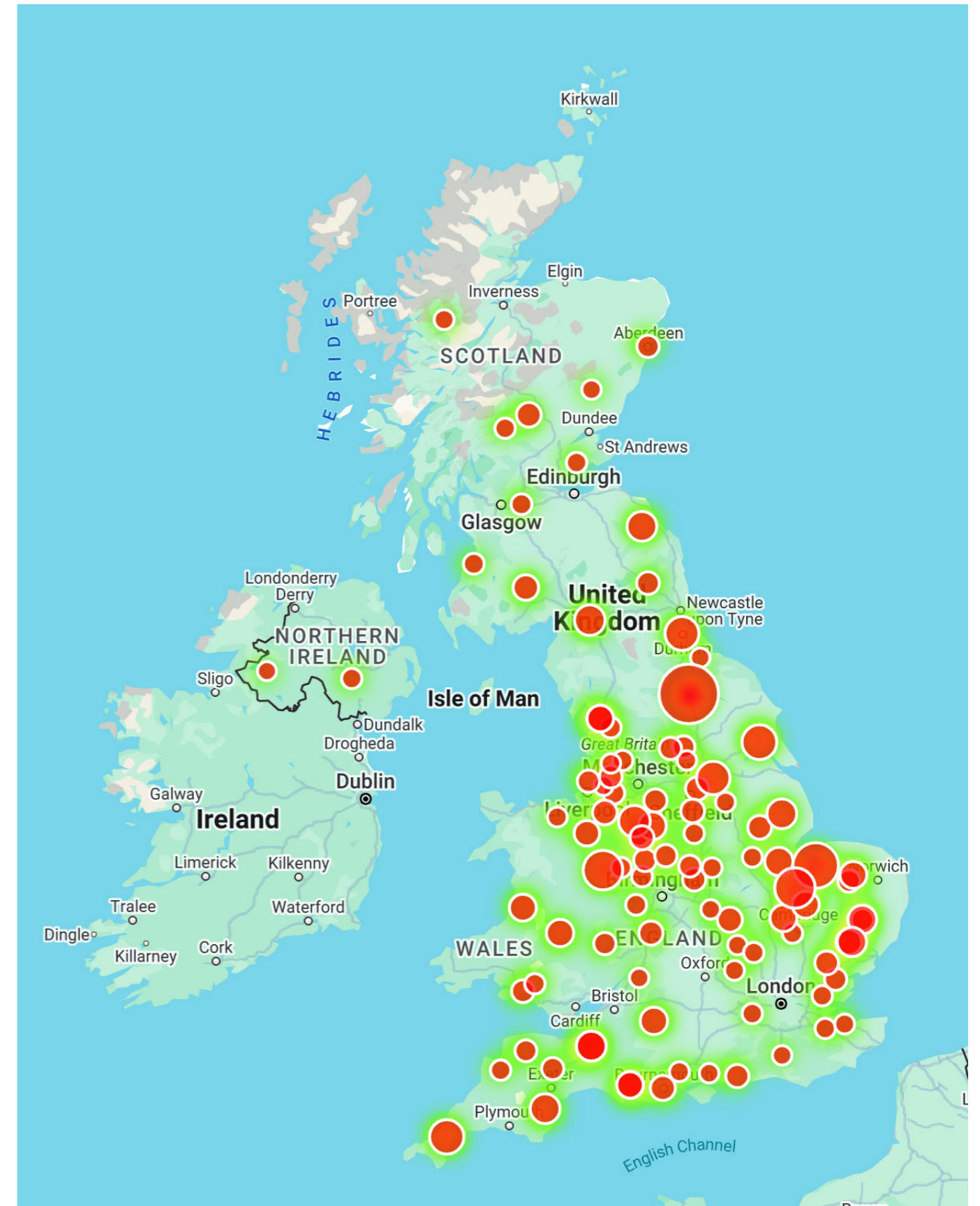


Figure 14: Annual numbers of dog breeding licence applications in Northern Ireland between 2019-2023 compared to total inspection numbers and totals of licences granted, as recorded from the FOI requests to all UK local authorities by FOUR PAWS.

Heat Map of Registered Dog Breeders’



Comparison of the FOUR PAWS UK FOI results from 2023 with those by Battersea Dogs and Cats Home from 2016 reveal a striking change in hot-spot locations for dog breeders.⁸⁸

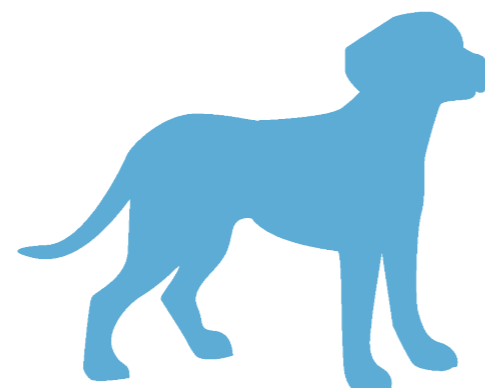
In 2016, the four UK local authorities with the most breeders were Carmarthenshire (81), Ceredigion (41), Kings Lynn & West Norfolk (21) and Shropshire (19). These remained in the 2023 top ten, but the other six were replaced by Somerset, Cornwall, Fenland, Doncaster, Durham and Cheshire East. Three Scottish local authorities (Angus, East Ayrshire and South Lanarkshire) were in the 2016 top ten but none remained in 2023.

The current south of England hot-spots of Teignmouth, Cornwall and Somerset did not feature on the 2016 list at all.

However, hot-spot locations change frequently, sometimes even annually. Defra figures for licence holders in North Yorkshire in April 2024 recorded 75 registered breeders, but in April 2023 there were just seven.⁸⁹ This represents an increase of 168% in just 12 months.

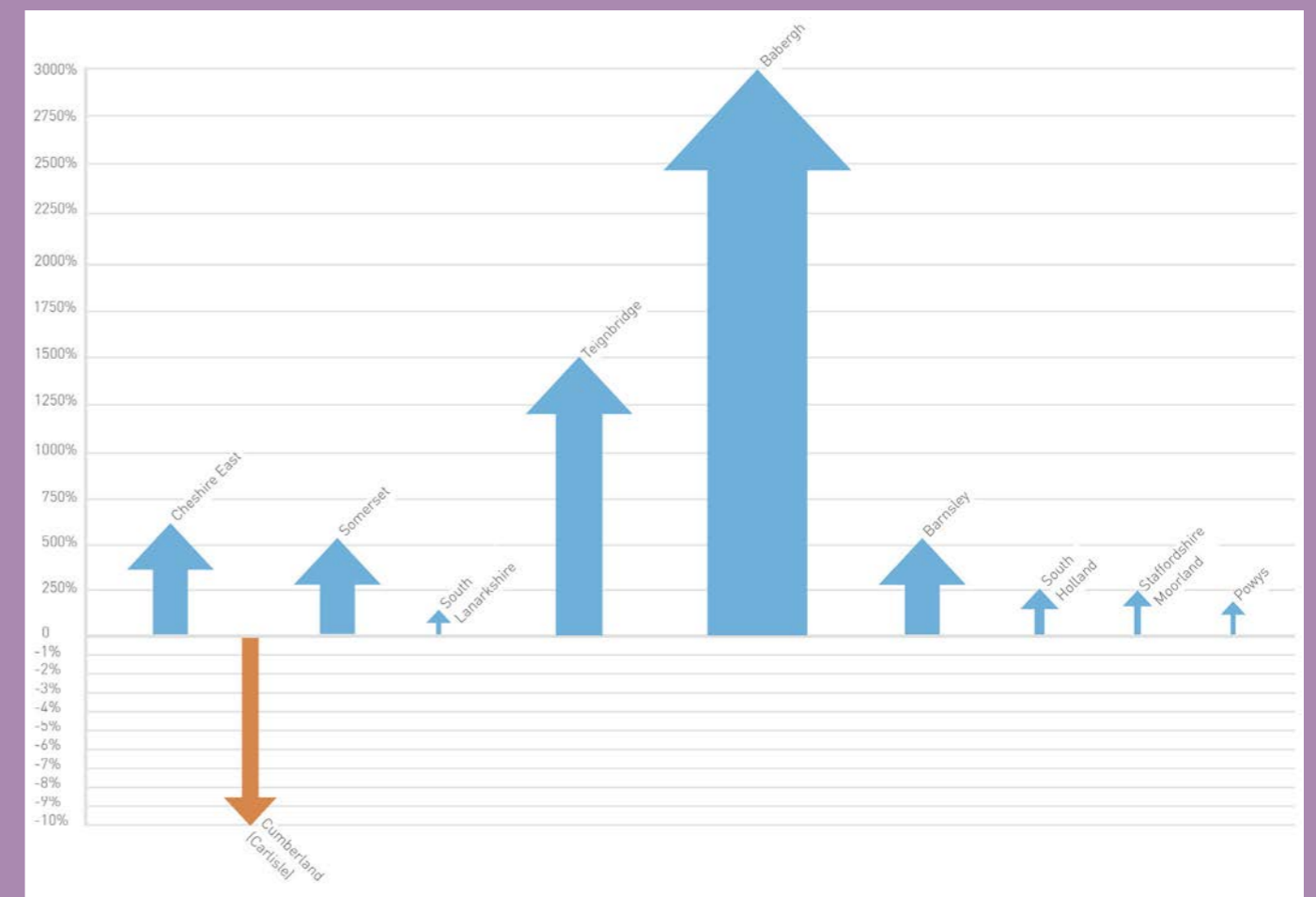
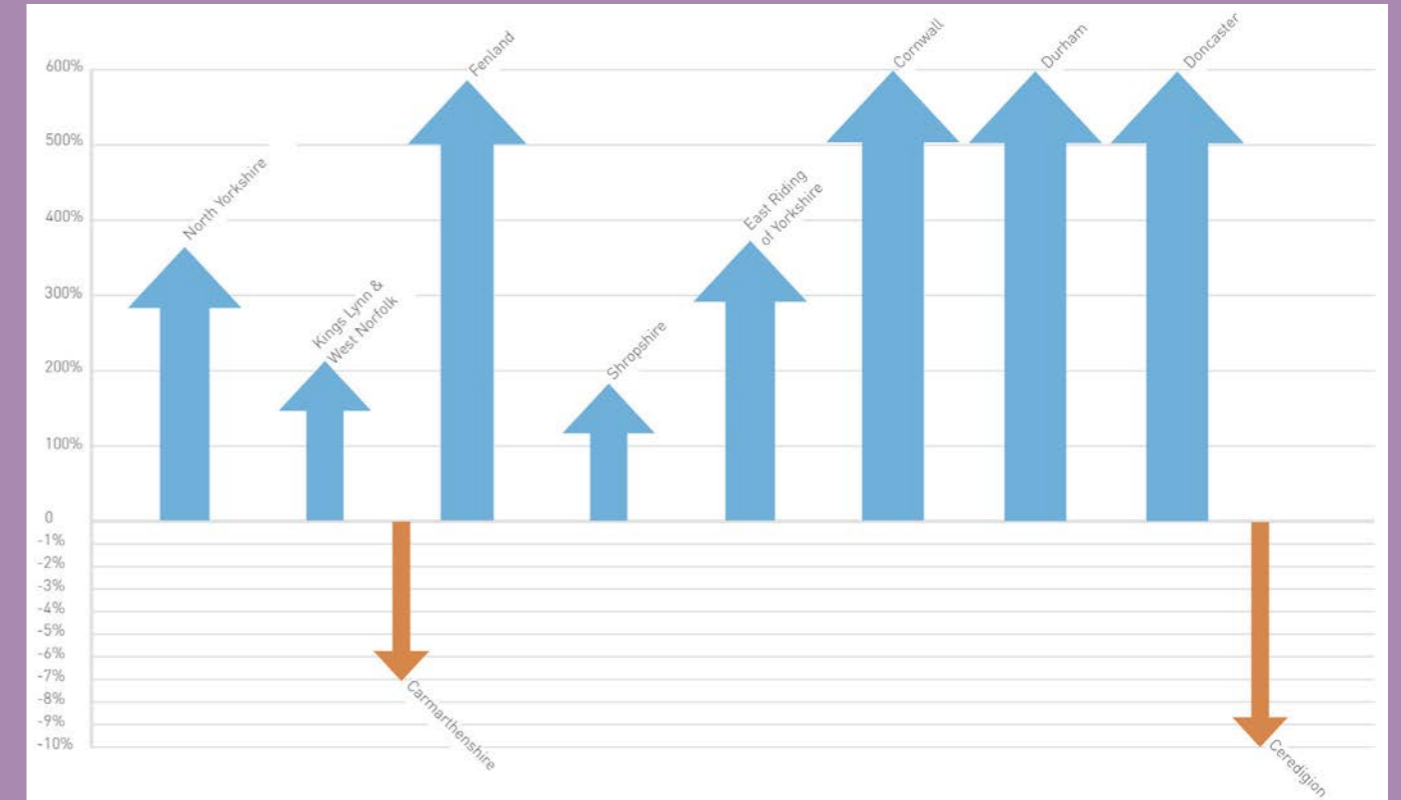
In 2022, the English local authority with the largest number of licensed breeders was Bournemouth with 46. But by 2023, this number had more than halved to 21. Likewise, Plymouth was home to 43 breeders in 2022 but just six in 2023.

These rapidly occurring peaks and troughs represent an enforcement challenge for local authorities in terms of their ability to anticipate or predict year-on-year resource allocation. This means that already limited resources can be overstretched, potentially leading to new licence applicants not facing the scrutiny and monitoring that is necessary to safeguard animal welfare.



Top 20 UK Local authorities with the highest number of licensed breeders in 2023 (based on FOUR PAWS UK FOI data).

The graphs show percentage change from 2016 (based on data from Battersea Dogs and Cats Home).⁹⁰



Key findings and conclusions

Where we should be seeing a consistent enforcement picture across the country, we have found variation in terms of effort, proactive approach, reactive response, and data collection.

Our survey reveals a postcode lottery of enforcement capacity across the UK, with most of the country characterised by sweeping licence approvals, insufficient inspections and a lack of action following complaints.

License approvals and revocations

Between 2018 and 2023, 70.9% of licence applications were renewals. The proportion of renewals to new applications has decreased slightly over the last decade. In 2014, 89% of all licence applications were renewals, up from 80% in 2010. In 2023, this dropped to 68%, almost certainly due to an increase in numbers of three-year licences being granted resulting in fewer annual or biennial renewals.

Longer licences appeal to both local authorities (secured income, less demand on resources) and business (fewer statutory inspections, less bureaucracy). However, this loses sight of the fundamental purpose of the licence which is to safeguard animal welfare.

There appears to be a readiness to approve renewal applications, suggesting that once in the system and on the radar, these applications are something of a tick-box formality. Lack of appropriate training, skills and confidence could be contributing to a resulting

Country	Licence renewal approval rate
Wales	106.3%
Northern Ireland	100%
Scotland	100%
England	95%

Table 6: Licence renewal approval rate, 2018-2023 (2019-2023 for Northern Ireland)

New licence applications are much less readily approved in Wales than in England, Scotland and Northern Ireland.

Country	New licence approval rate
Northern Ireland	95.5%
Scotland	94.2%
England	87.9%
Wales	63%

Table 7: New licence approval rate by country, 2018-2023 (2019-2023 for Northern Ireland)

Between 2018 and 2023, just 35 licences were revoked or suspended out of a total of 9,882 UK licences granted.

The high acceptance rates of both new and renewed applications across the UK suggest insufficient scrutiny is taking place to fully ensure the wellbeing of the dogs involved.

At the Efra hearing on 28 November 2023, a senior Defra official said that:

*"In practice, if you have a licensed breeder who is engaging in activities that are not along the right lines, they are likely to have their licence suspended or revoked rather than a criminal prosecution being pursued. That is what tends to happen in practice."*⁹²

Given the low numbers of licence suspensions and revocations, it is more likely that informal improvements will be requested following an inspection (whether new, interim or renewal) within a timescale and a revisit undertaken to confirm compliance.

Local authorities also reject new and renewal applications and deploy improvement notices rather than revoking or suspending existing licences.^{93, 94, 95} Some council enforcement and animal welfare policies require officers to work with licence holders to secure and maintain compliance, before taking more formal action (in line with their enforcement policies but in conflict with the regulations). This approach is likely to be too late for many of the dogs and puppies involved, particularly where proactive enforcement is required to address declining welfare.

The issuing of penalty notices generates as much work for the enforcement authority as a prosecution, because the burden of proof remains the same. With that in mind, should a person fail to pay the notice, local authorities should proceed with a prosecution. They could withdraw the notice, but this sets a bad precedent and means the non-compliances remain unresolved.

However, in a BBC report from June 2022, Alison Farrar from Trading Standards Wales said the lack of prosecutions does not mean there is a problem saying:⁹⁷ *"I actually see that as a good thing".* She saw the role of Trading Standards as helping *"breeders bring their business into compliance...because it's only when things are really bad that you have to get as far as a prosecution."*

However, there is a valid contrary argument that local authorities should not wait until issues escalate to the prosecution stage before taking action. Regular and timely inspections are essential for identifying non-compliance early on and for triggering a response that alleviates animal suffering.

The underlying reluctance to use these tougher enforcement measures may be due to a fear of escalation, combined with evidence of low fines or minimal penalties by the courts. In addition, a lack of cost recovery for the local authority for the resources required to build the prosecution case, could also be a deterrent. Regardless, wilfully non-compliant breeders are not deterred.

Inspections

Regulations mandate an inspection for each new and renewal licence application, and a further compliance inspection during the licence term (for England, Scotland and Wales). Our FOIs suggest that this is not taking place. In fact, more licences were being granted than there were inspections for the following:

- ▶ Wales: 2019 and 2022
- ▶ Scotland: 2019 to 2022
- ▶ Northern Ireland: 2019 to 2023

While COVID-19 lockdowns impacted inspections to some extent, they should not have been a factor after December 2021.



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A minimum of one inspection per licence term is not enough to ensure good welfare standards and the risk to animal welfare will increase through the move to extended licence periods. Additional inspections above the obligatory minimum should be undertaken, but it does not appear that many local authorities are performing these. Most breeders are able to anticipate and prepare for their licensing renewal inspections, which means that inspectors may not see the true welfare picture.

Longer licence terms

There is a significant trend towards issuing licences for more than year. In England, there were 2,513 licensed breeders in December 2023, but only 1,186 licences were granted during that year. This means that in 2023, 1,327, or 52.8% of all breeders in England held either a two- or three-year licence and therefore did not have to undergo a yearly inspection. Of the 66 licence holders in Kings Lynn & West Norfolk, 25 held three-year licences (37.8%), 35 held two-year licences (53%) and six held one-year licences (9%). This will account for some of the discrepancy in levels of licence approvals versus inspections in individual years.

Inspection rates across the UK are already low, and allowing breeders to hold longer licences further reduces the frequency of these already infrequent inspections.

Complaints

Despite the importance of following up on complaints about breeders to ensure good dog welfare, it does not appear that this is happening in the UK.

Between 2018 and 2023, the number of complaints made to local authorities by the public about breeders was high in England (4164) and Wales (449).

However, other than in Wales in 2023, the number of inspections, revocations, suspensions, and declined applications did not appear to increase accordingly.

Conclusions from complaint follow-ups were that:

- ▶ There was insufficient evidence to progress a prosecution
- ▶ There was no breach of the licence
- ▶ No further action was needed other than monitoring
- ▶ Referral to other departments or listed as civil or contract matters

It is recognised that not all public complaints will

justify or warrant an inspection (such as complaints about non-licensing issues like noise). However, the involvement of the public is vital to the enforcement process, providing real-time and specific information on poor practices. People want to ensure animals are treated well and should be encouraged to make complaints and pass on information. This intelligence directly informs enforcement action.⁹⁸

People will feel more assured that complaints are taken seriously if a designated animal welfare specialist can make expert and informed assessments of complaints as they arise.

Expert personnel

- ▶ Only 21% (68) of UK local authorities had licensing officers with the word 'animal' in their job titles.

Assessing the welfare of dogs and their puppies requires training, expertise and experience to ensure that all aspects are properly considered. If an inspector has little such experience in this area, it is unlikely that they will be able to detect welfare issues.

A later version of Defra's statutory guidance for local authorities introduced a requirement for training courses to include a practical element. At that time, just two providers met this criterion, with the result that many officers have completed inadequate courses and cannot justifiably claim to meet Defra's "suitably qualified" requirement, under the 2018 regulations. This specified that inspectors must hold a Level 3 OFQUAL-regulated qualification but failed to define either specific training content or expected outcomes.⁹⁹

This enabled training organisations to create their own courses¹⁰⁰ resulting in inconsistent quality. Some courses were not even OFQUAL-approved, while others were merely online question-and-answer courses with no exams or practical assessments. Course fees ranged from £100 to over £1,200. Despite these shortcomings, many local authorities continue to rely on such courses to meet the 'qualified' inspector requirement.

Poor record keeping

- ▶ Local authority records are often incomplete, inconsistent, and inaccurate.
- ▶ Often, figures do not add up or records are incomplete. Many authorities did not reply to all FOI questions.
- ▶ Several local authorities could either not locate

inspection or complaint records or simply did not record them in the first place.

- ▶ Local authorities do not always have resources to fund robust case management systems, making data analysis challenging.

Good record-keeping is essential to ensure all breeders are monitored and do not fall through the cracks. There is little consistency in record-keeping requirements and efforts across the UK's local authorities. This is particularly evident in the disparity between the figures in the Defra's figures for 2023 licensed breeder numbers, and those obtained by the FOUR PAWS UK 2024 FOI survey.

If important information is not being recorded and interrogations for statistics are not undertaken regularly to support KPI's (and FOI's) it is impossible to accurately produce reliable data.

Licence fees

Licence fees vary markedly.

- ▶ In England, they ranged from £58 in North Somerset and £86 in North West Leicestershire to £1,000 in Guildford and £835 in Bath and Northeast Somerset.
- ▶ In Wales, they ranged from £120 for Rhondda to £370 for Blaenau.
- ▶ In Scotland, they ranged from £117 in South Ayrshire to £467 in West Dunbartonshire.
- ▶ In Northern Ireland, the fee was a uniform £150 for up to ten breeding bitches, £200 for 11-25, rising to £350 for 200 bitches, plus £50 for every additional 100 bitches.

The lack of uniformity around licence costs is surprising. In two adjoining local authority areas in Somerset, fees were £835 in one and £58 in the other. In some authorities, costs seem excessive, but in others they seemed so low to cover the necessary spectrum of inspection and enforcement costs.

Larger operations pay the same fee as smaller ones but require significantly more time and resources for inspections, which would not appear to align with proper cost recovery principles. This inconsistency needs to be addressed to ensure fairness and effective cost recovery across the board.

Greater advice and guidance regarding what a licence should cover is necessary, and consideration should be given to whether the fee is based on the number of breeding bitches.

Local authorities should conduct and evidence a detailed assessment of chargeable costs rather than increasing fees annually in line with inflation. Sensible and accurate cost recovery in fee setting should help address this issue, with the standardisation of fees in the Licensing Act 2003 a possible model.

Some local authorities charge higher fees for two and three-year licences, which contradicts Defra's assertion that higher standards would result in longer licences that would be less expensive for local authorities due to fewer inspections, ultimately benefiting operators as well.¹⁰⁰ This issue needs to be addressed to ensure that all local authority costs are covered while also providing fairness and consistency for operators in different regions of the country.



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Recommendations

There is little value in creating new systems when resources for existing regulations are inadequate. What is being proposed here is a better application of existing resources and tools, revision of the opaque guidance that leads to subjective decision-making and the establishment of a mandatory registration system for breeders.

Creation of an expert national body or regional teams to coordinate and undertake enforcement

Local authorities licence a wide variety of businesses and activities, requiring officers to have insight, expertise and training on diverse issues. Different authorities will have different licensing priorities, pressures and resources which results in inconsistency.

There is a lack of clarity around percentage of time dedicated specifically to animal activities licensing. Job titles may suggest an animal-specific role but often encompass a wider range of responsibilities. For example, food safety officers and health & safety officers may also handle animal activity licensing as part of their broader duties. Other job titles will also not make reference to an animal related role that does form part of that unrelated job title.

Almost all officers inspecting animal activities also have responsibility for a large range of other licensing regimes. The work of local authority licensing officers is determined by local priorities. Alcohol and entertainment, gambling, taxis and scrap metal dealers take up most of the officers' workloads, although they also licence hypnotists, sex-shops and casinos.¹⁰²

Efra's 2024 report concluded that the ability of local authorities to perform key regulatory activities is constrained by a lack of specialist knowledge and training, and inadequate funding and resourcing. It found that existing variations in training, accreditation and enforcement put animal welfare at risk.¹⁰³

In particular, the Efra report stated that:

*'Current enforcement of the licensing regime is unsatisfactory. While some local authorities have developed expertise in animal welfare, the overwhelming majority of English local authorities lack suitably qualified inspectors.'*¹⁰⁴

Although Defra's LAIA guidance stipulates that licensing officers must be "suitably qualified" this same requirement is not included within either the Scottish or Welsh regulations.¹⁰⁵

These factors result in an inconsistent approach nationally and what Efra described as a 'postcode lottery' in terms of levels of understanding and prioritisation of animal welfare issues.

For the past decade, there have been repeated calls for a more coordinated approach to LAIA-related licensing enforcement. While the LAIA regulations addressed gaps and inconsistencies in the licensing mechanisms, an opportunity was missed to create a more uniformly applied system for dog breeding licensing.

Efra's 'Animal welfare in England – Domestic Pets' report, published in 2016, made recommendations that were repeated in the committee's "Pet Welfare & Abuse" report, published in April 2024. Highlighted was the need for inter-authority and multi-agency cooperation and coordination, as well as the introduction of a central unit of trained, expert inspectors.¹⁰⁶ Similar calls have been made by APGAW.¹⁰⁷

A national coordinating body, such as that established as part of the Animal Licensing Wales initiative, could share intelligence amongst enforcement bodies on illegal dog breeding and facilitate ongoing training for local authority licensing officers on best practice around licensing inspections and licence approval criteria. This is a key recommendation in the 2024 Efra report.

The intentions behind the creation of the National Wildlife Crime Unit to coordinate enforcement activity and share intelligence were commendable, but it has been subject to ongoing funding and resource pressures. The current strategic review being undertaken by Defra provides an opportunity to consider an entirely different system for licensing activities involving animals, to address widespread concerns with the current system. This is an issue wider than the licensing of dog breeders and extends across the LAIA spectrum to include farm animal inspections and the licensing of dangerous wild animals and primates by local authorities.¹⁰⁸

LAIA licensing as a whole could be outsourced to a more localised or regionalised team that would undertake all licence administration, inspections and compliance/enforcement on behalf of local authorities in a distinct UK region. This would remove the need for every local authority to employ a designated LAIA licensing specialist and could represent a longer-term cost saving.

It could also address the rapidly changing peaks and troughs that we have identified in breeder numbers within individual authorities and remove the need for those with small numbers of breeders to invest in the development of permanent expertise. A regionalised team could establish a consistent and defensible licensing fee for all dog breeders, eliminating the current wide disparity in fees charged by different local authorities.

This mode of working is already used in the UK: the local authorities of Bridgend, Cardiff and Vale of Glamorgan pool resources through a Shared Regulatory Services initiative.¹⁰⁹ Similarly, many London boroughs use the expertise of the City of London's veterinary services, which inspect "relevant animal business establishments" and help "with complaint investigations".¹¹⁰

Some local authorities, such as Humberside, organise animal welfare training days in conjunction with organisations such as the RSPCA and Crown Prosecution Service. Topics covered include areas such as ear cropping, the puppy trade and associated police powers.¹⁰⁴ The Institute of Licensing (IoL) also provides animal welfare enforcement training courses to supplement their Level 3 Animal Inspectors course. However, according to an enforcement professional, this is the exception to the rule, as most local authorities and the police do not proactively ask for training and have to be prompted.¹¹¹ This reticence to draw on the freely available skills from expert organisations is not easily understood.

Knowledge sharing and coordination would also be effective in maintaining an expert proactive function to help combat puppy smuggling. It should be acknowledged that some of the individuals, networks and mechanisms that facilitate the sale of puppies smuggled into the UK are indistinct from the domestic unlicensed trade.¹¹²

The illegal industry is often linked to organised crime and has a transnational scope.¹¹³ Trans-national puppy smuggling will remain an activity over which local authority inspectors can only ever exert little direct



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enforcement control, given that they operate at the very end of a lengthy supply chain, with numerous actors.

Tackling organised, trans-national crime requires higher-level coordination, so that intelligence is gathered, assessed, and then acted upon by a range of enforcement bodies including the police, Animal and Plant Health Agency (APHA), and Border Force and involving carriers, businesses, the public and the animal welfare sector.

The continually high demand in the UK means that large numbers of puppies are still being smuggled into the country. These young animals invariably experience pain, fear and distress as they are smuggled across Europe, and subsequently often experience ill health and disease and shortened lives. These enforcement bodies need a resource that enables them to share intelligence and knowledge and the means to develop their expertise in the multiple stages of the trade, from source to sale.

The patchy, post-code lottery of enforcement has to be addressed by a system that establishes a nationally joined-up approach covering all LAIA areas, which creates and develops hubs of expertise and excellence, tackling existing and emerging issues of animal welfare concern. A UK Animal Welfare Taskforce (UKAWT), operating regionally and collaborating nationally, could provide the means by which local

authorities could draw on expertise without having to recruit, train and retain dedicated individuals.

Improving the value of inspections

The quality and consistency of inspections need to be improved. Currently, the scoring table used for licence renewals, which covers breeder compliance history and welfare management, is highly subjective and, without specialist knowledge, training and a common approach across all local authorities, is limited in value.¹¹⁴

As stated earlier, the error in the guidance regarding the 1- and 3-year compliance period in the text and the online form is an easily correctable error that creates inconsistency in risk scoring which has a direct impact on licence duration. This has been raised with DEFRA on several occasions but remains uncorrected.

Standardised, independent benchmarking should be created and formulated into model guidance that is uniform, easily understood and nationally implemented. All guidance should be developed, maintained and overseen by impartial and independent welfare experts.

Increasing the frequency of premises inspections

The FOI figures indicate an inspection frequency less than that required by the legislation and guidance. However, these figures may be distorted

by inconsistent methods of recording within case management systems and inconsistency of recording inspection/visit types.

With that caveat, our findings show that the majority of breeders are only inspected once, usually following their first licence application and then only on subsequent renewal. This could lead to a decline in compliance standards among some businesses between inspections. Even if only the minimum number of statutory inspections were conducted, they would likely help identify deteriorating standards sooner, allowing for timely intervention and maintaining the overall quality of breeding activities.

Given the increasing proportion of licence holders with two or three-year licences, obligatory and unannounced annual inspections of dog breeding establishments, regardless of licence period, should be reinstated. The cost implications of this could be overcome by raising licence fees or pooling local authority resources regionally to develop expertise and capacity.

Greater response to public complaints

The many public complaints made to local authorities about dog breeders do not currently prompt more annual inspections or lead to increased enforcement action.

Despite several high-profile instances in which public complaints have led to licence revocations, many more complaints were described by local authority respondents as “unfounded.”^{115, 116, 117}

When set against the recognised lack of animal welfare expertise at local authority level, this is a major concern. It is more likely that animal welfare failings simply go unrecognised, rather than being “unfounded”, and so remain unaddressed.

Local authorities must provide officers with the necessary investigative skills and training to equip them with the knowledge, skills, and confidence to properly investigate allegations and complaints. This would ensure that any unfounded complaints are evidenced as such, rather than being dismissed simply because they are too difficult to pursue.

As previously mentioned, improved and consistent recording of complaints, allegations, and the actions taken would provide greater clarity on how cases are managed, referred, or justifiably dismissed. Without comprehensive record-keeping, it is impossible to determine the true volume of complaints.

The reluctance of local authorities to pursue formal enforcement may, in part, be due to the lack of cost recovery in prosecutions, where low fines fail to offset expenses. Consideration should be given to increasing fine levels and awarding greater costs to local authorities, particularly in comparison to the significant profits generated from illegal puppy sales. More inspections reveal more concerns and cases of non-compliance. This would be the case if more complaints were followed up. This can only mean that bad breeders are continuing to operate unchallenged.

The public needs to know that complaints to licensing authorities, will be treated seriously and followed up with inspections by qualified and experienced animal welfare experts. Accurate recording is the answer. Expertise within non-governmental organisations could actively inform and assist in this respect, yet it is rarely drawn upon.

Improved enforcement of existing licensing regulations by local authorities

Enforcement approaches are not uniform and there is no consistency in the means by which non-compliance is identified or addressed. Existing mechanisms that can address bad practices or non-compliance are not used consistently or regularly. Licences are very rarely revoked or suspended. Authorities rarely take legal action, relying instead on encouraging compliance rather than punishing bad practice. Efra’s 2024 report found that this reticence protects both licensed and unlicensed breeders from higher-level enforcement.¹¹⁸

To resolve this, local authority licensing officers must make greater use of their ability to revoke or suspend licences where animal welfare concerns are identified. Licence revocation is usually just a secondary consequence of court action and prosecutions are infrequent.

In addition, Defra must include improvement and penalty notices in its annual local authority data return for the LAIA regulations to better understand how enforcement is being carried out. As it stands, there is no link between Defra’s model enforcement option and what is happening in practice.

Increased enforcement effort by the Animal Licensing Wales project in 2023 increased the number of inspections and improvement notices issued for non-compliance. The result of this has still to be assessed.¹¹⁹

However, in a 2024 case in Cornwall, there was no follow-up inspection for two months after an improvement notice was served. Welfare by then was so bad that the licence was immediately revoked.¹²⁰ Follow-ups must take place much sooner to minimise animal suffering.

A 2023 Defra consultation proposed the introduction of penalty notices for animal health and welfare offences in England. But in its response, the Chartered Trading Standards Institute said that it was “very rare” for licence holders to comply with improvement notices either to a “minimum standard or in part” and that “The issuing of a penalty notice (would) not stop the behaviours of the individual.”^{121, 122}

Legislation has since made penalty notices an enforcement option for animal health and welfare offences, with their use seen as the middle-ground between minor, first-time offences and a prosecution.¹²³ It is crucial that poor welfare is addressed, and breeders deterred from non-compliance, regardless of which notice is used.

FOUR PAWS backed the consultation response of Wildlife and Countryside Link (WCL), which warned that licence breaches could lead to harm to animals and that attending officers must have the skills “to assess the welfare impact and identify when it crosses

the line into animal cruelty.”

Link’s response added that penalty notices were “too weak” a punishment for cruelty cases and should not be the primary enforcement tool used. It added: “We feel strongly that licence withdrawal and prosecution should remain the primary enforcement options for licensing offences involving cruelty.”¹²⁴

These measures are currently used inconsistently and there has been little assessment or evaluation of their impact, application and effectiveness.

Their success is also contingent on who they are deployed by. They need to be in the hands of officers with sufficient expertise, knowledge and confidence who are skilled in handling situations where decisions are challenged. The existing low levels of animal welfare expertise at enforcement level currently mean that ineffective sanctions or no sanctions whatsoever are both common.

This is an area of enforcement where existing clarity and guidance is clearly inadequate and needs to be addressed. It should be noted that the enhanced enforcement effort in Wales, specifically in 2023, led to a far greater number of inspections which resulted in an associated increase in improvement notices. Evaluating



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the subsequent impact of this activity on compliance will be important in determining if this is a tool that can and should be used more widely. However, in cases where there is evidence of compromised welfare, suffering, neglect, or mistreatment of animals, prosecution should always be the preferred course of action.

Improved Monitoring and Recording of Data

Our research found glaring gaps in record keeping which hampers monitoring and enforcement efforts. Consistent data collection and management is urgently needed together with more transparency and enforcement capacity.

To achieve this, FOUR PAWS UK calls for the following:

- ▶ Records kept of how complaints are dealt with and the proportions relating to licensed and unlicensed breeders.
- ▶ Records should distinguish between data for different licensed animal activities so that it is clear how many complaints and inspections are made for dog breeding licences.
- ▶ The number of litters produced by a breeder annually to be recorded; this data should be publicly available, given its role in determining licensing thresholds.
- ▶ Licensing authorities should uphold the requirement in Schedule 6 of the LAIA Regulations for licensees to maintain and share extensive records, including dates and times of puppy births, sex, colour and weight, sales undertaken, and healthcare plans.
- ▶ Full records of inspections and enforcement actions should be undertaken and their outcomes made publicly available including what type of licence application they relate to (in terms of duration), how many are undertaken for new or renewal applications, mid-term inspections on extended period licences, or unannounced or unplanned inspections.
- ▶ Information should be provided to Defra on qualified inspectors and names of courses undertaken along with course provider details.

Clearer criteria on breeds with associated welfare issues

Although outside the scope of this report, there is considerable scientific evidence concerning the welfare issues associated with certain breeds, such as brachycephalic dogs, and clear arguments for stricter regulations for them.¹²⁵

Efra has urged the government to produce clearer guidance for local authority enforcers regarding section six of the LAIA Regulations. Under this,

licensing officers can refuse a licence based on concerns about dog's health and phenotype and genotype. However, licensing officers can lack the expertise necessary to understand this guidance.¹²⁶

FOUR PAWS UK recommends that the guidance proposed by Efra should list the breeds for which licence issue would be unlikely and details of any exceptions. This must be adhered to both by licensing officers and breeders.

Defined upper limit of litter numbers

FOUR PAWS UK believes that six litters is far too many for the lifetime of a dog, and that such a high number causes significant harm.¹²⁷ In addition, a dog of just twelve months is too young to breed, especially larger breeds that are not fully mature until two years old.¹²⁸ A dog giving birth too young, puts at risk both the mother and her pups.

Young dogs may be unable, physically or emotionally to handle pregnancy and birth, leading to long-term health problems. Similarly, breeding a female dog older than eight years can cause considerable harm. FOUR PAWS UK recommends that regulations permit no more than four litters for one female dog, not breeding in consecutive seasons and only breeding dogs between the age of one and eight years.¹¹⁰

Specifying dogs on the licence

Currently, a vet is only required to inspect a breeder at the time of a new application. This inspection includes an assessment of the dogs presented, as well as the suitability of the operator and premises. However, the guidance is clear that the individual dogs inspected are not listed on the licence, only the total number must be recorded.

There is no legal requirement that the dogs presented at the initial inspection must be those subsequently used in breeding. A breeder could therefore present six healthy bitches and studs for approval but go on to use entirely different animals for actual breeding. Dogs and bitches can be brought in or removed from the premises (or elsewhere) at any time, with no obligation to notify the local authority. This loophole presents significant risks to both dog and puppy welfare.

Parentage can only be verified through DNA testing, which is typically only carried out in response to a complaint. In the absence of a restriction using only the dogs assessed for the activity, unsuitable dogs could continue to be used for breeding unchecked.



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Regulation 9 of the licensing regulations includes a process for licence variations. Under the horse-riding establishment guidance, for example, any new horses must be checked by a vet for fitness for use. Evidence of that check must be provided to the local authority, and a licence variation must be submitted to add the new or replacement horse.

It is recommended that individual breeding dogs are named on the licence, including their microchip numbers. Any new dogs intended for breeding should be subject to a veterinary check (by the breeder's own vet), with a formal variation application submitted—mirroring the horse-riding establishment model.

Raise awareness with buyers about the risks of the illegal puppy trade and educate pet owners

In its evidence to the Efra inquiry, Defra acknowledged that its 'Petfished' public awareness campaign had been successful in targeting potential buyers with important messages about buying a pet, particularly online.^{129, 130} However, then Defra minister Lord Benyon added that the "best way" of communicating with that audience was via animal welfare charities.

FOUR PAWS UK already communicates information about responsible pet buying and ownership to its supporters; contrary to Lord Benyon's claim, it is

potential pet buyers without links to animal welfare NGOs that should be targeted.

This audience can better be reached by the utilisation of diverse communication channels, such as those the Government has access to. Animal welfare charities such as FOUR PAWS UK would willingly share the advice provided.

Local authorities have a responsibility to provide proactive advice and reactive responses. They should be able to knowledgeably advise licensed breeders on responsible dog breeding and potential buyers on how to purchase responsibly. Key information, such as the register of licensed breeders in each authority, should be actively publicised and not just maintained on a website.

Improve accountability of breeders and online sellers: tackle online sales platforms

In 2023, 72% of puppy sales took place online, through sales platforms such as Pets4Homes and Gumtree.¹³¹

Such sites are now the main marketplace for puppy purchases in the UK yet are largely unregulated. Regulations that do exist are poorly enforced, especially those covering online pet transactions and international transportation of pets.

In 2019, the LAIA Regulations were amended to include Lucy's Law, which states that puppies and kittens must only be sold by the breeder and not by third-party sellers. FOUR PAWS UK conducted an in-depth investigation a year later and discovered that dealers were still advertising on major classified ad sites without providing licence numbers.¹³²

Amendments to the LAIA Regulations are essential to better control puppy sales online. Currently they are too vague to be enforceable and are not improving animal welfare.

The 'Advertisements and sales' in Schedule 6 for example, should state the details required in advertisements - the breeder's licence and the verifications needed before a dog can be advertised for sale.¹³³ Adverts must also include the seller's verified registration or licence number so that their identity is clear and traceable.¹³⁴

The Lucy's Law amendment was a positive improvement, but its intended effect cannot be achieved without the addition of these comprehensive checks by third party sites and the tightening up and enforcement of advert requirements.

A national database and licensing for all breeders

A far more robust system of licensing is crucial to enabling local authority licensing officers to tackle unscrupulous breeders and sellers. It would address the rapid escalation in illegal puppy breeding and smuggling from Europe, while simultaneously providing the reassurance that buyers need.

LAIA does not cover all breeders. Currently, and regardless of the numbers of litters bred, breeders can sell puppies without a licence if they are not deemed commercial vendors and if their annual commercial turnover is less than £1,000. Defra guidance directs local authorities to the HMRC's business income manual, but the Dogs Trust has described the determining HMRC test as 'unfit for purpose', while others have warned that licensing authorities regard it as subjective, unnecessarily complicated and difficult to apply.^{135, 136, 137}

As a result, many breeders who should be operating under licence are not doing so. Some licensing officers also believe these breeders do not require one.

While a registration system for all breeders would address this ambiguity, there are concerns that it could lead to a two-tier system, further stretching

local authority resources. It would also not provide enforcement options, since there can be no licence conditions attached to a registration.

The alternative is to create a more effective single-tier system, which encompasses smaller breeders. This would require minimal changes to case management systems and a 'restricted' licence or stipulated limit on number of litters per year could be developed for them.

For full traceability, anyone breeding, selling, or transferring the ownership of a puppy (a dog up to six months old), must be registered with a nationally verifiable database. The inclusion of that person's unique registration or licence number on any advertisement must be mandatory.¹³⁸

The UK currently has 22 different microchipping databases, posing an unnecessary challenge to vets, animal rescue charities and local authorities trying to identify lost or deceased animals and the police when tackling illegal activities.¹³⁹ In response to the 2023 Defra consultation on penalty notices, the Chartered Trading Standards Institute said that these databases were "shockingly poor in the way in which they are operated" and that addressing their deficiencies was crucial before considering penalty notices. The institute added that "Local authority access is inconsistent" and that "several of these databases are known as the puppy farmers chip company of choice for a reason. LAIA inspectors are not all checking dogs' registrations."¹⁴⁰

To address this, in 2024, Defra pledged to establish a central portal for microchips to be used by vets, local authorities, and the police.⁹⁵ While this is welcome, a centralised, publicly accessible list of registered and licensed breeders with a requirement to display an associated registration number on any dog sale adverts would enable a much more informed assessment of the UK dog population, full traceability and greater reassurance for potential buyers.

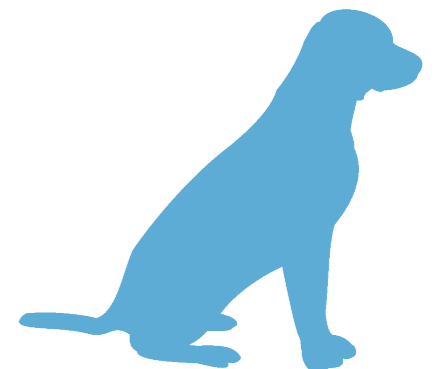
FOUR PAWS, with EuroPetNet, pet registries and classified ad sites have developed a 'model solution' that would enable full traceability across the UK online puppy trade. It would require all puppies to be microchipped and registered, and registration of the advertiser to be verified, before an advertisement can be published online. This solution has already been trialled successfully in Ireland and Switzerland.¹⁴¹

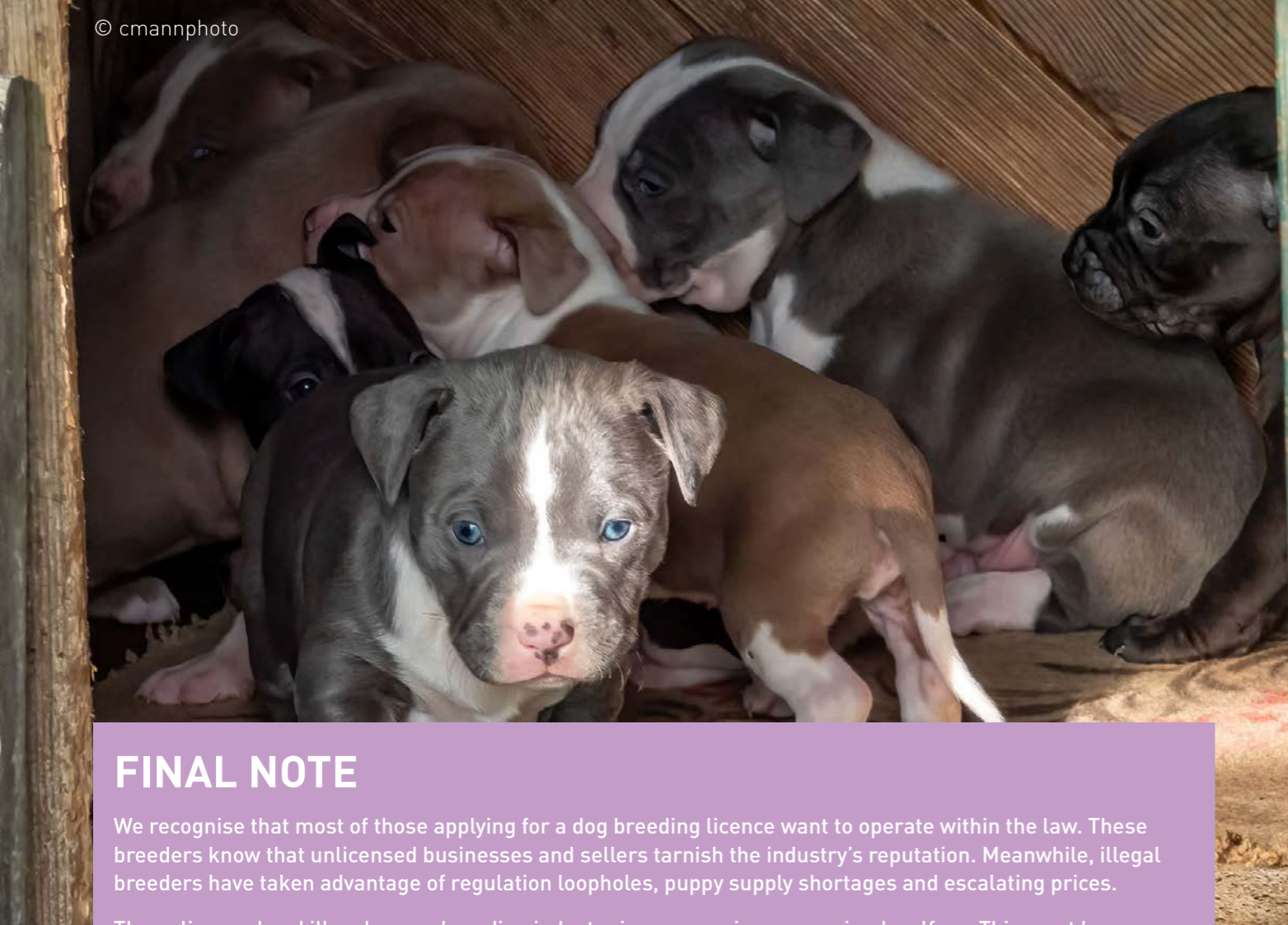
In Ireland, VeriPet works with [Dogs.ie](https://www.dogs.ie) and dog registration database FIDO as a voluntary option for advertisers. Its effectiveness has not been fully

assessed but the number of post-sale concerns has already dropped by 90% compared to non-VeriPet ads. [Dogs.ie](https://www.dogs.ie) allows users to easily distinguish between verified and non-verified listings - verified ads are clearly marked and have a verification link that gives access to additional non-sensitive information on the animal, such as age, sex and breed as authorised by the FIDO database.

Verification links could also include details, such as whether a breeder is registered. Links enhance ad security beyond registration verification, by enabling buyers to cross-check the registration information against the details provided by the seller, increasing transparency and building trust in the transaction.

In Switzerland, the VeriPet project was implemented by [anibis.ch](https://www.anibis.ch), one of the biggest Swiss classified ad sites and Amicus, the only registry in the country. The response has been positive, and consumers have quickly adapted to the system. Over the course of its first year, more than 2,000 microchip numbers were checked on [anibis.ch](https://www.anibis.ch), representing approximately 17% of the total number of advertisements in the dog category.





FINAL NOTE

We recognise that most of those applying for a dog breeding licence want to operate within the law. These breeders know that unlicensed businesses and sellers tarnish the industry's reputation. Meanwhile, illegal breeders have taken advantage of regulation loopholes, puppy supply shortages and escalating prices.

The unlicensed and illegal puppy breeding industry is encouraging poor animal welfare. This must be addressed urgently. Puppies produced by illegal farms are far more likely to be sick and to have a much shorter lifespan, during which they and their mothers will suffer pain and trauma.^{142, 143}

Illegal puppy breeding is not a peripheral activity and is not limited to the geographical boundaries of the authority in which it operates. It is increasingly associated with serious, organised, transnational crime and must be prioritised accordingly.

The prospect of high financial reward and low enforcement risk in terms of fines and punitive action, means that the unlicensed trade attracts unscrupulous breeders and sellers. Penalties for non-compliance are low compared to those issued for drug-dealing or people-smuggling, despite both activities having been found in association with both licensed and illegal dog breeding.^{144, 145}

The poor enforcement of licensing regulations also has considerable socio-economic implications and affects a far wider range of people than is immediately apparent – the illness and untimely death of a pet causes expense and heartache

The reasonable assumption should be that a licensed business complies with rules via a recognised set of ongoing checks, balances and scrutiny, but this is not the case. Instead, there is inadequate oversight of licence renewals, few inspections despite the high numbers of public complaints and a reluctance to enforce regulations that deter non-compliance. Passive administration and oversight have replaced active enforcement.

A licence should provide legitimacy for authorities and reassurance to buyers that their new puppy has had the best start in life.

A licence should be a badge of good practice and high welfare standards, that is integral to providing buyers with the reassurance they need to make the right choices around buying a puppy.

But while many good breeders are being licensed, the system allows far too many bad ones to operate with unjustified and inadequately verified legitimacy, placing welfare at risk and diminishing its credibility.



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About FOUR PAWS

FOUR PAWS is the global animal welfare organisation for animals under direct human influence, which reveals animal suffering, rescues animals in need and protects them through our sanctuaries and campaigns. Founded in 1988 in Vienna by Heli Dungler and friends, the organisation advocates for a world where humans treat animals with respect, empathy and understanding.

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