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# Tricks of the Trade: exposing the truth about the illegal puppy trade in the UK



## FOREWORD

It's no secret that puppies are big business, with the recent pandemic causing nothing short of a puppy boom. Our 'one-click' convenience culture means that many puppies are often just commodities, easily purchased accessories for social media pics, rather than family pets living 15 years or more. Sadly, this lack of care and patience when choosing a four-legged friend has far-reaching consequences, both for animals and humans.

Popular breeds including dachshunds and brachycephalic (flat-faced) dogs, such as French bulldogs and pugs, follow trends like any fashion; but these dogs are born with inherent health problems, often requiring expensive surgery just to walk or exercise normally. Over the last few decades, evidence has shown large scale commercial breeders prioritising profit over welfare, known as puppy 'farms' or 'mills', pumping out hundreds of thousands of often unhealthy pups.

Puppies exploited in the illegal (and often legal) international puppy trade are also removed too early from their mothers and transported long distances through multiple countries, resulting in higher degrees of stress and infectious disease spread. Since 2020, a ban on puppies sold without their mothers present in England, Scotland, and Wales, known as 'Lucy's Law', means all UK breeders are now accountable, however other outdated legislation still facilitates the import of puppies both legally and illegally.

This mass abuse of sick pups and their parents, plus their expectant humans in the UK, is fueled by a vile trade lacking in any compassion or transparency. Forged documents and connections with organised crime, dishonest online adverts and a lack of awareness of responsible breeding and buying practices, all allow this trade to continue.

Legislation proposed in the now dropped Animal Welfare (Kept Animals) Bill which, amongst numerous positive steps for animal welfare would have included raising the age of imported 'cute' pups from 15 weeks to 'less cute' six months, could have made a serious impact on reducing numbers of smuggled pups entering the country.

Depressingly though, this Bill has now been dropped by a Government seemingly ignoring any urgency.

So, thanks once again, FOUR PAWS UK, for highlighting these important puppy smuggling issues, and using evidence in this report to try and force both positive change and solutions, to protect animals and humans both here and abroad.



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## EXECUTIVE SUMMARY

It is well known that the United Kingdom (UK) is a nation of animal lovers. An unintended consequence is that **the UK is now one of the biggest destinations for the illegal puppy trade.**<sup>1</sup> This trade poses a serious health risk to both people and animals whilst causing terrible suffering to millions of dogs and puppies.

Up to 1.5 million dogs enter the UK market annually,<sup>2</sup> and, due to the increasing ease of buying animals online coupled with the ability to sell puppies with anonymity, the profitability of the illegal puppy trade has increased significantly.<sup>3</sup> Despite several legislative powers being in place to enforce the welfare of puppies and dogs within the UK, the trade is still rife.

**Approximately half of all puppies entering the UK market are imported or come from unlicensed breeders.** Imported puppies can be subjected to journeys of up to 33 hours with insufficient water, food and toilet breaks, and with sleeping medication often used to sedate puppies on these long journeys, to make their transport across borders inconspicuous.<sup>4</sup>

Purchasing a puppy from an illegal breeder poses serious consequences for both animals and people. Puppies are at extreme risk of health problems because of inadequate living conditions and a lack of proper care or required vaccinations, which often results in an early death.<sup>4</sup> Owners are subjected to not only heartbreak but also high costs when seeking veterinary care for the animal, on top of the already high bill for the purchase of the puppy.<sup>5</sup> Rescue centres across the UK are also inundated, with puppies increasingly being relinquished or abandoned as the cost and responsibility of raising a puppy becomes too much.<sup>6</sup>

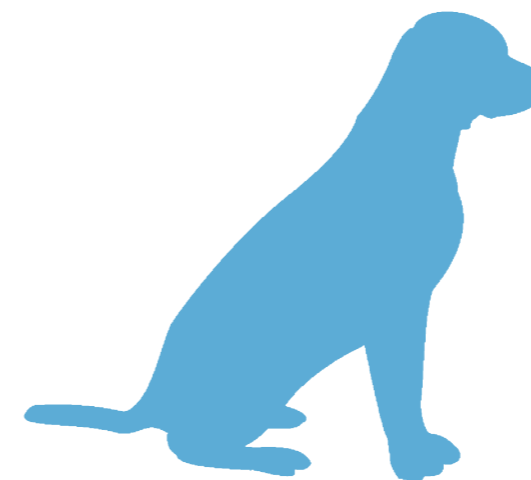
This report reveals the impact that the COVID-19 pandemic has had on puppy-buying trends in the UK, as well as emphasising the industrial scale of the illegal puppy trade and how imported puppies are increasingly available for sale on classified advertising sites. Research by Savanta also provides a better understanding of consumers' motivations around buying a puppy.

An investigation and analysis of online adverts for puppies, conducted by TRACKS Investigations, found that puppy breeders were using a number of methods to deceive unsuspecting customers into purchasing illegally bred or imported puppies.

The research from both Savanta and TRACKS highlights the large-scale and ongoing nature of the puppy trade within the UK.

### Key findings from both sets of research on the UK puppy trade:

- ❗ Spending more time at home during the COVID-19 pandemic influenced people's decisions to purchase puppies.
- ❗ Companionship is the main motivation for buying a puppy.
- ❗ Buyers place the most importance on the health and character of the animal when choosing a puppy; however, when it came to choosing a particular breed, the most quoted criterion was appearance.
- ❗ Over a third of respondents found their puppies through social media sites.
- ❗ Most puppies with health issues were advertised through social media.
- ❗ Almost a third of puppies sold below the age of seven weeks were advertised through Instagram, compared with just 7% of puppies aged nine weeks or older.
- ❗ Nearly a third of online classified adverts selling dogs were attempting to trade in illegally imported puppies.
- ❗ Almost half of all puppies being sold on Gumtree were illegally imported into the UK.
- ❗ Over a third of puppies imported into the UK originated in Romania.
- ❗ Many Eastern European breeders investigated offered to falsify documentation.



## OUR RECOMMENDATIONS

In order to eliminate the illegal puppy trade, consumers, advertising sites and politicians must work together to safeguard the welfare of puppies across the UK. To achieve this, we recommend:

- ① An increased level of public awareness, with potential owners ensuring they undertake adequate research into breeders, whilst understanding the responsibility that comes with owning a puppy.
- ② The Government must reintroduce the provisions set out in its discarded Animal Welfare (Kept Animals) Bill relating to the age of imported puppies, ideally with imports limited to animals over six months of age.
- ③ Potential buyers must educate themselves on the tricks used by illegal puppy sellers in their online adverts with the help of this report and should report any concerning behaviour to our online reporting tool.
- ④ Classified advertising sites must adopt mandatory identification and registration in the form of the FOUR PAWS VeriPet system, to ensure that any dogs advertised have registered microchips, and that the identity of the seller is recorded and verified to allow for traceability.
- ⑤ Further legislation with stricter enforcement is needed, including enforced traceability of online sellers through mandatory identification and registration, as well as a clamp down on social media sites that are not enforcing their own policies.



## Introduction

### A Nation of Animal Lovers

The United Kingdom (UK) is a nation of animal lovers. Most households (62%) own pets, with dogs consistently reported as the most popular pet. In 2022, over a third of households had dogs, equating to an estimated 13 million dogs in our homes.<sup>7</sup>

COVID-19 saw a significant rise in dog ownership in the UK, with prices for dogs and puppies soaring well above pre-pandemic levels. Although prices are now reducing, at the time of publication the supply of puppies remains high. In November 2022 alone, over 40,000 dogs were advertised for sale on Pets4Homes, with each advert having approximately 80 buyers competing for each available dog.<sup>8</sup>

Becoming a dog owner is a huge investment, and something many owners underestimate. Companionship during the pandemic was the biggest motivation for those looking to buy a dog.<sup>9</sup> However, with people now steadily returning to the workplace, animal charities have raised concerns about increased abandonment, with one in five owners not knowing whether their dog will suit their post-lockdown lifestyle.<sup>10</sup>

Concerningly, traffic to webpages addressing 'giving up your dog' on Dogs Trust's website increased by more than 180% in July 2021 relative to pre-pandemic levels.<sup>11</sup> Further abandonment is expected as a result of the cost-of-living crisis, with almost half of dog owners worried about how they will afford rising vet bills, food and insurance costs.<sup>12</sup> A single dog could cost more than £30,000 over its' entire lifespan,<sup>13</sup> so it is pertinent for new owners to ensure that they have both the time and funds to ensure that a new dog can be well cared for, both psychologically and physiologically, before making a purchase.

### Puppy Breeding in the UK

Breeding dogs is legal in the UK.<sup>14</sup> In recent years, legislation has come into force to attempt to tackle the low welfare and high volume of puppies bred in the UK. Under the Animal Welfare (Licensing of Activities Involving Animals) (England) (Amendment) Regulations 2019 (Lucy's Law),<sup>15</sup> all third-party sales of puppies aged six months or younger are banned. This means that potential buyers must now buy directly from either hobby breeders (those breeding a maximum of two litters a year) or registered licensed breeders. In 2021,

886 dog-breeding licences were given out by local authorities in England, and 734 licences for the sale of pets.<sup>16</sup>

Licensed dog breeders are required to show puppies interacting with their mothers in their place of birth. Furthermore, since 2016, all puppies must be microchipped by eight weeks of age or breeders risk incurring a £500 fine.<sup>17</sup> The dog's microchip details must be registered to the dog's keeper, and must include the keeper's name, address and telephone number, and details about the dog. In theory, this means that potential dog owners can see proof of a microchip having been fitted before committing to buy a puppy. However, there is currently no mandatory requirement for a keeper registering their dog to have their identity confirmed prior to registering the dog in their name.<sup>18</sup>

### European Trade and Illegal Imports

The illegal puppy trade is rife in the UK. The demand for puppies is higher than the breeding capacity of licensed breeders in the country, leading to illegal and unscrupulous breeders capitalising on this demand. It is estimated that between 500,000 and 1.5 million dogs enter the UK market annually.<sup>2</sup> In May 2020, movement of commercially traded dogs rose by 387% on the previous month, and the number of licences issued increased by 87% in May to September 2020 compared with the previous year.<sup>19</sup>

Since the UK's departure from the European Union (EU), the rules for travelling abroad with a dog to countries in the EU have changed. Pet passports issued in Great Britain are now invalid. Instead, owners are required to obtain an Animal Health Certificate (AHC) within 10 days of the date of travel and a new certificate must be obtained each time the owner and dog visit the EU. The dog must be microchipped and vaccinated against rabies, and in some cases tapeworm treatments are also required.<sup>20</sup> This is a time-consuming and costly process, with just three trips to the EU potentially costing almost £1,000 for the certificates now required.<sup>21</sup>

Those importing pets commercially under the Balai Directive must ensure that the animal has come from a registered premises and is microchipped, vaccinated against rabies, and issued with an Intra Trade Animal

Health Certificate (ITAHC) by a qualified vet.<sup>22</sup> However, each ITAHC can cover several dogs in a consignment and they are not subject to checks at the UK border.<sup>22</sup>

The Animal and Plant Health Agency (APHA) have previously stated that less than 10% of consignments are checked post import, and with checks having been completely suspended during the COVID-19 lockdowns it is suspected that puppies will have been transported over the border illegally, as unscrupulous dealers will have been informed of the relaxed import regulations during lockdowns.<sup>23</sup>

The illegal puppy trade is hugely profitable, with an untold number of puppies bred in horrific conditions to be sold on classified advertising sites. **Puppy smuggling is considered an extremely lucrative business as profits are high, prosecutions low, and punishments not harsh enough to deter smugglers.**<sup>3</sup> However, due to its illicit nature, it is difficult to quantify the true scale of the illegal trade.

Data suggests that up to 510,000 puppies are unaccounted for in the UK.<sup>24</sup> Although it is not possible to put a definitive figure on how many of these animals are illegally imported, evidence suggests that there has been a large increase in the number of puppies being brought into the UK for sale, particularly from Eastern Europe.<sup>25</sup>

In June 2023, the Animal Welfare (Kept Animals) Bill<sup>26</sup> was dropped by the Government after stalling the Bill since November 2021. This Bill would have addressed puppy smuggling by reducing the number of pets that can travel under pet travel rules, increasing the minimum age of imported puppies, and restricting the import of pregnant dogs and those with mutilations such as cropped ears or docked tails.<sup>27</sup> It is now imperative that new legislation is brought forward to ensure the provisions of the discarded bill protect puppies and pregnant mothers from suffering unnecessarily as was originally intended.



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## Online Sales

Sadly, it has become increasingly easy to buy a pet at just the click of a button. The number of misleading adverts, fake paperwork and suspicious sellers is in the thousands, and unsuspecting families continue to unknowingly pay for puppies that may have been imported illegally.<sup>28</sup> This often means that the puppies get sick and even die within days of joining their new family.

As consumers become more savvy about the questions to ask of breeders and the surroundings they should expect at the premises where puppies are bred, the unscrupulous puppy dealers have also evolved, going to great lengths to disguise their commercial business, making it difficult to differentiate them from responsible breeders. Furthermore, **the ability to sell online with anonymity, coupled with today's culture of impulse purchasing and instant gratification, has significantly increased the profitability of the illegal puppy trade.**

Although legislation such as the Animal Welfare (Licensing of Activities Involving Animals) (England) (Amendment) Regulations 2019 (Lucy's Law)<sup>15</sup> is a huge step forward in combatting the illegal trade, it is clear that the trade continues to prosper both in the UK and abroad.

**There have yet to be any prosecutions brought under this relatively new legislation.** In addition, gaps in the legislation include loopholes that allow the licensing of some breeding facilities outside Great Britain, from which puppies can be legally imported and sold here from neighbouring countries under a Pet Sales Licence if they hold a UK Breeders Licence. These facilities can therefore effectively evade scrutiny and provide no guarantee of meeting British licensing standards.<sup>29</sup>

## FOUR PAWS VeriPet System

Lack of traceability is a critical issue. Puppy dealers will disappear once a sale has been made, leaving new pet owners to deal with the heartbreak of sick animals and high veterinary costs. The FOUR PAWS VeriPet system is an innovative technical solution to combat the illegal puppy trade and ensure that only registered dogs can be advertised online by traceable sellers.

With VeriPet in place, when placing an advertisement on a participating classified ad site, the seller would need to provide the dog's microchip number along with their mobile phone number or email. An automated check would then be carried out with pet registration

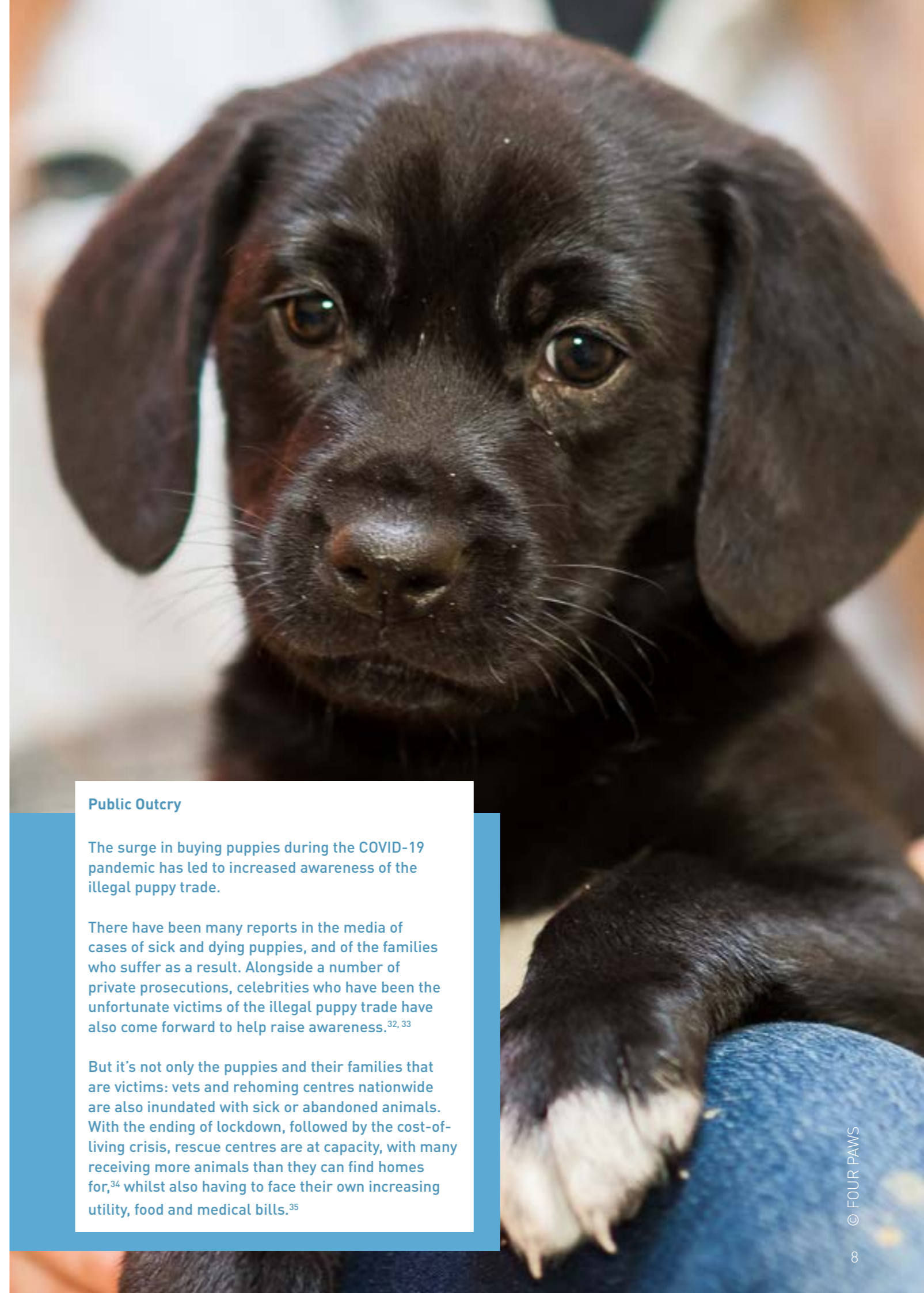
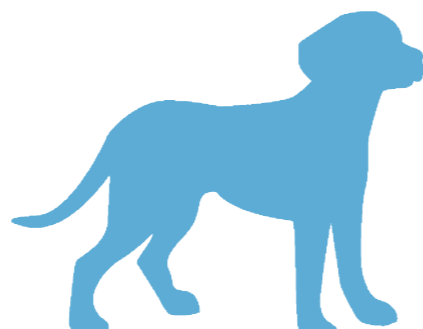
databases to ensure the details match. A onetime code will then be sent to the registered owner of the dog and this code will need to be added to the advertisement in order for it to go live. This means that only the person registered on the dog's microchip will be permitted to place an advertisement to sell the dog. Illegal puppy dealers who do not want to be traceable to authorities, and thus do not register the dog, will not be able to verify their identity and therefore will lose access to the online marketplace.

Through the co-operation of identification and registration databases, classified advertising websites and national governments, VeriPet aims to eliminate the illegal puppy trade through rigorous implementation at national level.

## Public Health Risk

The illegal trade also poses a significant public health risk. Puppies are often raised in unsanitary conditions and are inadequately vaccinated, meaning they potentially carry diseases that threaten the health of both animals and humans. Investigations have shown that as well as potentially carrying the tapeworm *Echinococcus multilocularis*, young puppies being illegally imported from Eastern Europe often have false vaccination stamps that indicate that a rabies vaccine has been administered, when in reality it has not been given as puppies must be at least 12 weeks old to receive this vaccine.<sup>30</sup>

Rabies is a viral zoonosis (an infectious disease that can be transmitted between animals and humans) that is not present in the UK. It causes progressive and almost invariably fatal inflammation of the brain and spinal cord. Tens of thousands of people die from rabies each year. Of these cases, approximately 99% are acquired from the bite of an infected dog.<sup>31</sup>



## Public Outcry

The surge in buying puppies during the COVID-19 pandemic has led to increased awareness of the illegal puppy trade.

There have been many reports in the media of cases of sick and dying puppies, and of the families who suffer as a result. Alongside a number of private prosecutions, celebrities who have been the unfortunate victims of the illegal puppy trade have also come forward to help raise awareness.<sup>32, 33</sup>

But it's not only the puppies and their families that are victims: vets and rehoming centres nationwide are also inundated with sick or abandoned animals. With the ending of lockdown, followed by the cost-of-living crisis, rescue centres are at capacity, with many receiving more animals than they can find homes for,<sup>34</sup> whilst also having to face their own increasing utility, food and medical bills.<sup>35</sup>



## Purchasing patterns

### Motivations for Buying a Puppy

Buying a puppy is a huge investment. With the COVID-19 pandemic, many people had more time at home due to stay-at-home guidance, working from home or being furloughed. This led to a significant increase in the desire for companionship and ultimately dog ownership, particularly as they now had more time to give pets the attention that they need. To identify puppy owners' main motivations for purchasing a puppy, the amount of research they undertook prior to purchasing a puppy, and what factors affected their experience once they brought their puppy home, FOUR PAWS commissioned a survey in several European countries at the beginning of 2022, which was conducted by the research agency Savanta. The respondents to the survey were people who had purchased a puppy during the period from the beginning of the first lockdown in March 2020 until February 2022. A total of 505 responses were collected in the UK.

Our research found that four out of five people felt that spending more time at home during the pandemic influenced their decision to purchase a puppy, with two in five buying a puppy for companionship. This is not surprising given that dogs are regarded as great companions and are reported to reduce loneliness, a familiar emotion for many during the height of the pandemic.<sup>36</sup>

### Preferences and Priorities

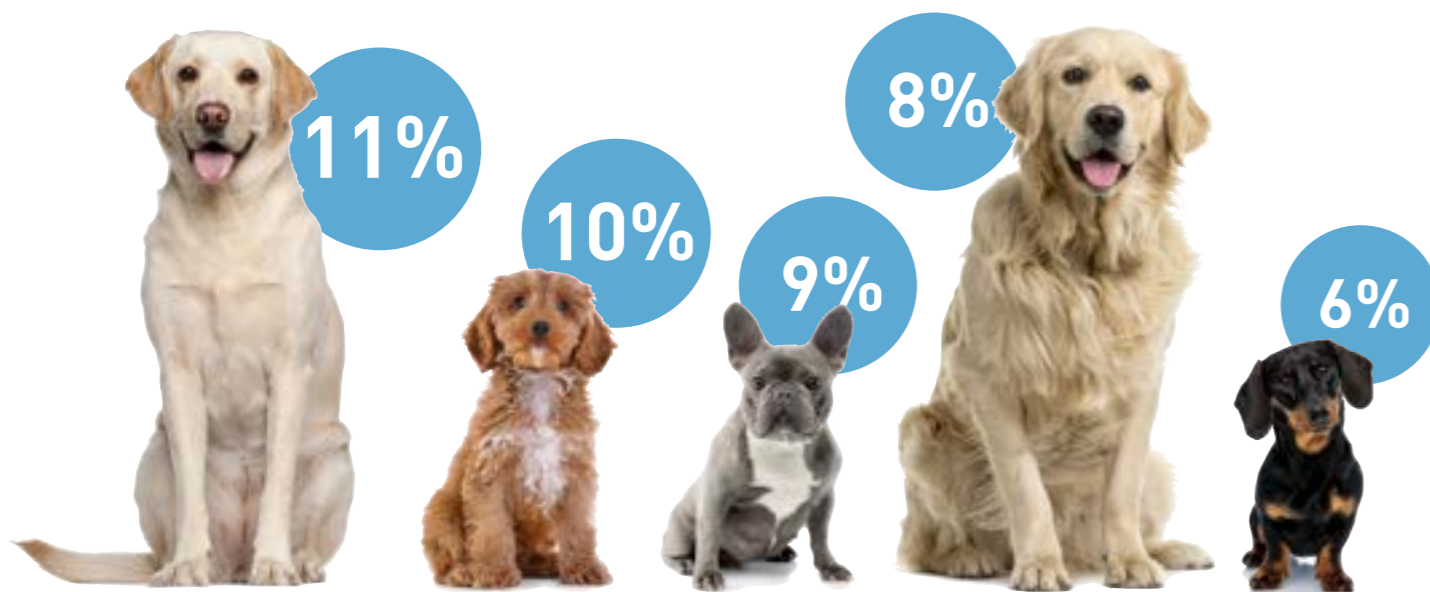
When purchasing their puppy, 83% of respondents identified the health of the puppy as the most important factor in their choice, followed by 72% who ranked the character of their puppy as very important. Responsible breeders act with these two factors in mind. Specifically, they ensure that the dogs they are breeding from are friendly, sociable and have no known health defects.

Unsurprisingly, 'cuteness', size and age were also cited as important factors by over half of the respondents. Unfortunately, this emphasis on the appearance and age of a puppy when considering a purchase allows the illegal puppy trade to thrive. **Buyers who choose a puppy based on aesthetic features without considering more important criteria – such as the puppy's breeding origins, documentation or the reputation of the breeder – are at risk of being exploited by unscrupulous breeders.**



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Labradors were the most popular breed purchased, closely followed by designer breeds such as Cockapoos and Labradoodles, French Bulldogs, Golden Retrievers, and Dachshunds and Chihuahuas.



### Where Can You Buy a Puppy?

Those looking to buy a puppy have more options available to them than ever before such as social media, classified advertising sites, and private breeders.

Research found that a third of people bought their puppy from a private breeder, with the next most popular source being Kennel Club breeders, friends or family, and commercial breeders. Only 1% acquired their puppy from an animal shelter or rescue. Whilst it is possible that rescue centres being shut to the public during certain parts of the COVID-19 pandemic could have affected these results, a Pets4Homes report published in November 2022 showed a 63% decrease in the willingness of people to adopt a dog compared to the previous year.<sup>8</sup>

Most worryingly, our research shows that 38% of respondents first saw their puppy advertised on social media sites, despite the sale of pets being banned on both Facebook and Instagram.<sup>37</sup>

Over half of all of puppies that were described by their purchasers as having had one or more health or behavioural issues were advertised on social media. **Almost a third of the puppies sold at younger than seven weeks of age were advertised on Instagram, highlighting the real danger of unscrupulous breeders being freely able to advertise.**

Clearly the terms of use of these platforms regarding the sale of animals are not being enforced. This raises serious concerns about the number of unscrupulous dealers potentially using social media to advertise sick, underage puppies to unsuspecting buyers.



### Are Dealers Being Honest?

Our research shows that over a third of breeders did not make the buyers aware that their puppy had health issues prior to purchase. This could be due to lax licensing regulations: breeders are legally required to have a licence only if they breed and sell three or more litters in a 12-month period, or if they are advertising a business selling dogs. Those who breed as a hobby and breed only one or two litters a year are exempt from the licensing regulations.

A dog will have around six puppies per litter, and the average price of a puppy reached £1,038 in November 2022.<sup>8</sup> This means that, legally, a hobby breeder could make over £12,000 through the sale of just two litters, with no need for a licence. **Worryingly, hobby breeding increased by 20% between 2019 and 2022, meaning that the number of puppies being traded surged during the pandemic.**<sup>38</sup>

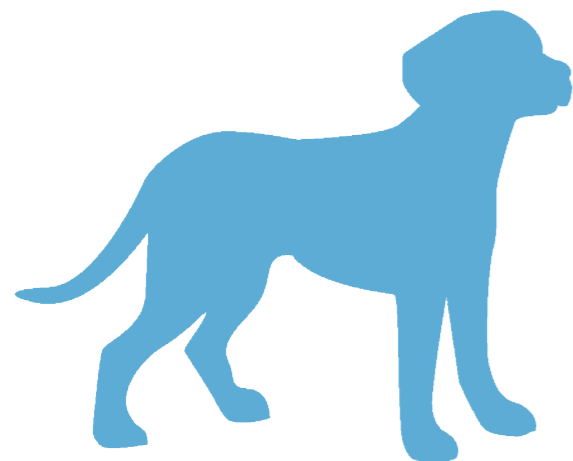
### Researching a Breeder

Researching the breeder before buying a puppy plays a crucial role in preventing health and behaviour issues. FOUR PAWS research found that almost a third of respondents' puppies had health issues after purchase, with those advertised on social media being more likely to have health issues.

Of those respondents who had researched the seller or breeder, 42% conducted their research on the breeder's website, and almost a third via social media accounts. Using only these sources can easily leave buyers vulnerable to false claims and misinformation.

## OUR RECOMMENDATION: DO YOUR RESEARCH

It is all too easy to fall into the hands of an unscrupulous puppy breeder. Potential buyers must ensure they are ready for the responsibilities, time and unseen costs that go into owning a puppy. It's imperative that adequate research of the breeder is undertaken prior to purchase and that buyers do not purchase puppies on unregulated social media sites due to the risk of coming home with an underage or sick puppy. Adopting from a rehoming centre is always a safer option.





## Puppy Smuggling: A European Supply Chain

FOUR PAWS commissioned an undercover investigation by TRACKS Investigations between April and May 2022 to provide evidence that puppies from Romania were being imported into the UK under the 15 week age requirement. Investigators set up a fake puppy dealership and engaged in meetings with vets, breeders and dealers from Romania using covert video equipment to expose the illegal practices used by puppy dealers when importing puppies into the UK, and the subsequent profitable sales via classified advertising sites to unsuspecting customers. Investigators met with 18 breeders during the course of the investigation.

The investigation revealed the inherent health risks within the trade to both people and animals, and the practices that dealers, breeders and vets use to bypass existing regulations.

### Forged Paperwork

**Two thirds of the breeders visited by investigators offered to supply illegitimate EU pet passports** for puppies with falsified data to facilitate the transport of underage puppies into the UK under the Pet Travel Scheme (PETS). Furthermore, one third of breeders stated that they regularly sell puppies without the legally required pet passports or rabies vaccinations. One particular vet visited by investigators issued passports for puppies knowing that they were too young to have these legal travel documents. Passport data was also falsified, including false declarations that the rabies vaccination had been administered. Additionally, the vet recorded the puppies as being six weeks older than they actually were and falsified information on the anti-echinococcus treatment and veterinary examination. The vet instead recommended that the puppies should not be vaccinated at such a young age and supplied two bottles of rabies vaccine for the prospective buyers to administer themselves when back in the UK. However, in both Romania and the UK, rabies vaccinations must be administered by a qualified veterinary professional.<sup>39</sup>



### Welfare Issues

Due to the fraudulent nature of this trade, the welfare of puppies cannot be guaranteed.

**The illegal puppy trade is characterised by a lack of transparency and accountability from breeders, dealers, vets and transporters.**

Puppies are often bred in horrific conditions and can be subjected to journeys of up to 33 hours to the UK, with insufficient water, food, exercise, or toilet breaks.<sup>4</sup> Investigators found that phenobarbital, a sedative medication used in humans, was used to sedate puppies, making their transport through UK borders less conspicuous.

Puppies that have been poorly bred, not protected against deadly zoonotic diseases and then transported long distances will often suffer from compromised behavioural and social development as well as physical health problems. This can have long-lasting impacts on a puppy's life, potentially resulting in disease, as well as an increased likelihood of subsequent abandonment and euthanasia.<sup>29</sup> **Shockingly, it is estimated that half the puppies entering the UK market are likely to be imported or come from unlicensed breeders.**<sup>24</sup>

*Vets can falsify documents, allowing the trade to continue.*  
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## OUR RECOMMENDATION: ADDRESS PUPPY SMUGGLING IN LEGISLATION

Imports must be regulated by increasing the minimum age of imported puppies to six months. If implemented effectively, this will ensure that puppies have adult teeth rather than milk teeth, a trait that will be easily identifiable at border checks, meaning that underage puppies with falsified data will be recognised and not allowed to enter.

This increase in age will help to eradicate the puppy trade as older puppies of over six months are not as desirable as their younger counterparts.





## The Online Trade: Deceptive Adverts

### Illegal Activity

The UK has the largest e-commerce market in Europe.<sup>40</sup> With almost a third of all retail sales now being online, it is unsurprising that people would make the switch to purchasing puppies online too.<sup>41</sup>

Research was commissioned by FOUR PAWS and undertaken by TRACKS Investigations from April to June 2021, focusing on the sale of puppies on the classified ad sites Gumtree, FreeAds and Pets4Homes. A total of 736 online adverts were investigated between April and May 2021 to ascertain the scale of imported puppies on UK classified ad sites, the ease with which cross-border dealers can sell puppies online, and the tricks that sellers use to make these sales.

The research was subsequently expanded through follow-up, in-person visits to sellers that the investigators believed to be involved in the illegal puppy trade. Initial enquiries to sellers were made by phone and/or online messaging, followed up using texts and WhatsApp. Responses were recorded in writing, supplemented by screenshots of online adverts, relevant messages and images of pet passports and paperwork, such as vaccination certificates.

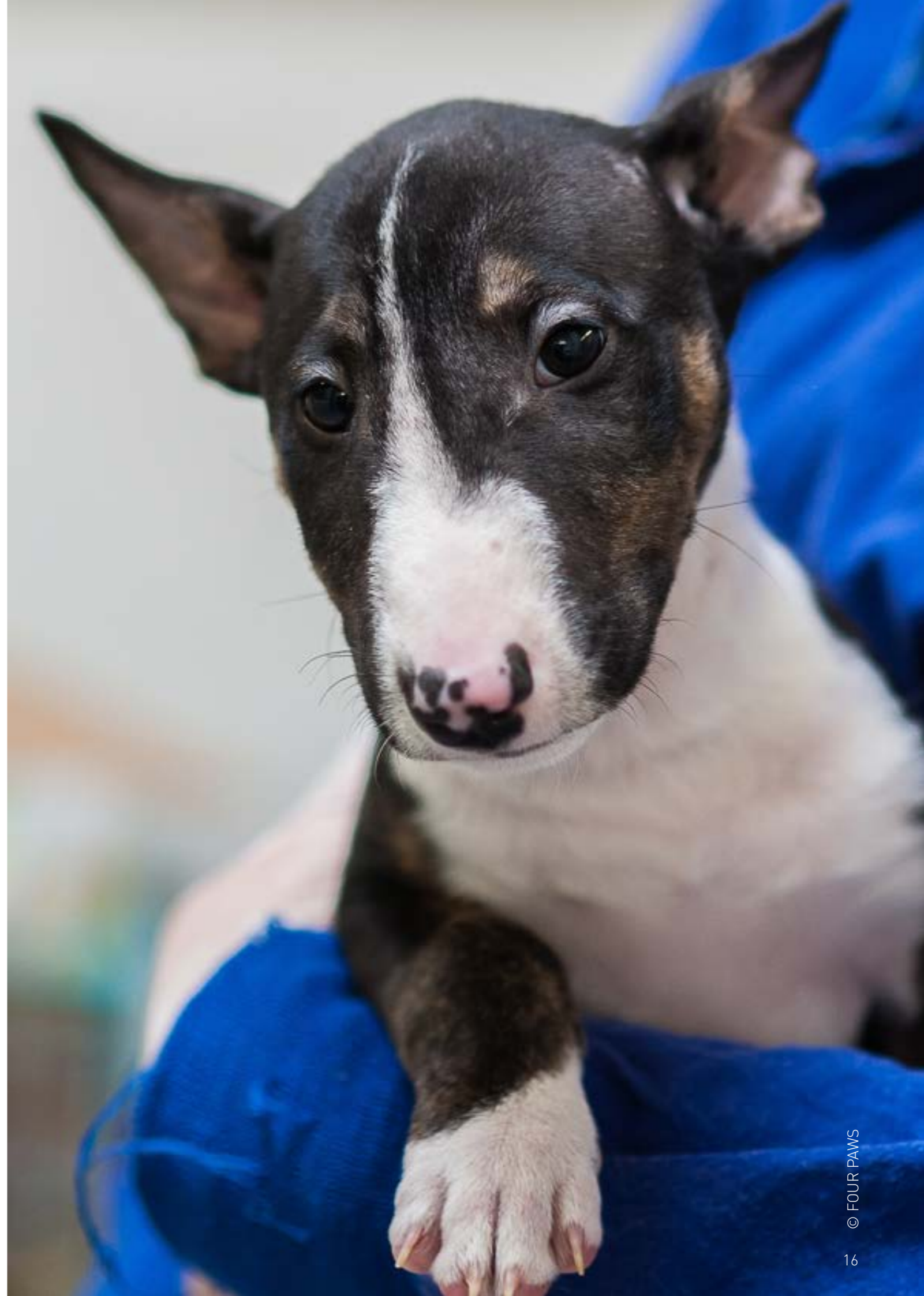
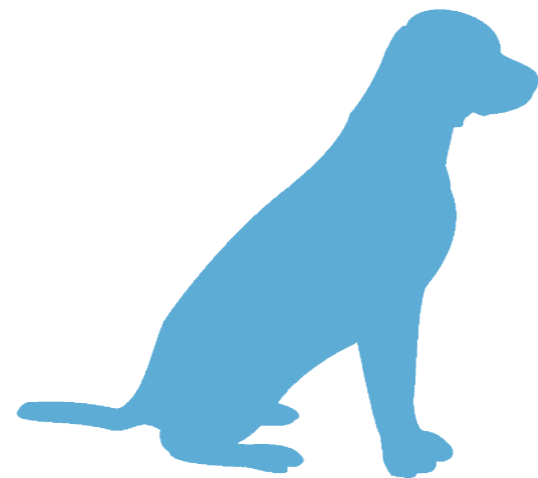
Suspected illegal breeders were identified over the course of the research, with nine suitable cases selected for follow up in-person visits in June 2021.

Investigators posed as potential customers, and covert cameras were used to document the visits and provide direct evidence of the issues raised.

The research found that of the 736 online adverts examined, almost one third were confirmed to be of illegally imported puppies, with one third of imports originating from Romania. Gumtree had the greatest number of imported puppies, with almost half of all adverts selling puppies that had been illegally imported into the UK.

Across all advertising sites, prices were astonishingly high, ranging from £1,100 to £4,500 for breeds such as Pomeranians, Chow Chows, French Bulldogs and Maltese. Investigators also uncovered more than 50 suspected breaches of the Animal Welfare (Licensing of Activities Involving Animals) (England) (Amendment) Regulations 2019, also known as Lucy's Law.<sup>15</sup>

Hotspots for advert locations within the UK were London, Essex, West Yorkshire and Buckinghamshire. However, a third of advertised puppies originated in Romania, and nearly a quarter were from Hungary.





## The Tricks of the Trade

There are numerous ways unsuspecting buyers can be tricked into thinking they are buying a happy, healthy puppy from a reputable breeder in the UK, when increasingly the reality is they are purchasing an illegally imported puppy with a myriad of possible health issues.

Below are just some of the ways investigators commissioned by FOUR PAWS found that unscrupulous puppy dealers are tricking their unsuspecting customers through misleading adverts.



### Selling in the puppies' best interests

Sellers of imported puppies stressed that the sale was in the puppies' best interests, and that importing puppies gives them a better life in the UK than in their country of origin. These suggestions easily appeal to buyers' sympathies, with their good intentions to help a puppy in need leading them unwittingly to fuel an exploitative trade.

### Offering to deliver to the buyer's door

Sellers of imported puppies seemed keen for a quick and easy sale, offering to deliver the puppy direct to the buyer. Responsible sellers will not make this offer. Home deliveries create uncertainty regarding the origin of puppies and is yet another breach of Lucy's Law, which requires sellers to show puppies interacting with their mother in their place of birth.



### Paid advertising memberships

Paid membership accounts used by sellers on classified ad sites gave their adverts greater prominence on the site and increased the sense of legitimacy. The repeated use of paid premium accounts to sell illegally imported puppies suggests that dealers are still evading detection and are even providing significant revenue to these sites. The lack of verification of sellers when advertising allows illegal sellers and breeders to be practically untraceable.

### Different names and numbers

Throughout the duration of the research, sellers of imported puppies used different names and phone numbers to advertise their puppies over consecutive weeks, to appear as if they were different individuals. Only through detailed comparison of photographs, postcodes, phone number records and puppy details was it clear that many adverts were from the same individual, suggesting that they were breeding on an industrial scale. This lack of transparency makes tracing the origin of puppies almost impossible.

### Claims of quality

Sellers of Pomeranians from Russia stated that their puppies are of 'higher quality' and use this as their unique selling point. Sellers suggested that buying dogs from Europe ensures higher quality for a lower price. In such cases, an unwitting customer could be fooled into thinking that purchasing an imported dog was advantageous, without realising they are fuelling an illegal business.

### Kennel Club 'registration'

Claims that a UK Kennel Club registration application had been made and that paperwork was on the way but delayed by COVID-19 was also a tactic used by sellers. Others promised that UK Kennel Club registration would be quick and easy for the buyer to do themselves. This claim is misleading as UK Kennel Club registration would not be legitimately provided to a puppy that had not been bred according to the registration requirements.



### Feigning legitimacy

Sellers and breeders can use keywords and formalities to imply legitimacy, even without any evidence that they are operating within the law. Examples include sellers stating that the import was 'declared on the Government website' or that they are 'licensed pet transporters who travel with the animals'. One seller stated that she was a registered breeder in the UK, but supplemented this activity with importing puppies due to UK limits on how many puppies can be sold. Her claim to UK registration was provided to give an impression of validity, but showed how she was undermining the system put in place to safeguard animals.

### Customer references

During the research, illegal sellers offered contact with previous customers who could vouch for their legitimacy. Although prospective buyers may feel reassured by this, there would be no way of verifying these testimonials. Furthermore, if they were genuine, the references would illustrate the persistent lawbreaking and highlight the sustained scale of the trade.



# Five Warning Signs of a Suspicious Dealer

## 1. The seller suggests meeting in a public place

Although it may feel safer to some buyers to meet in a park or coffee shop, this tactic means the seller's true location can never be known and the puppy's true background is obscured. As per Lucy's Law, the sale must take place on the premises in which the puppy is bred, and must be seen interacting with its mother before the sale is finalised.

## 2. The puppy was advertised in advance of its arrival in the UK

Sellers of imported puppies will advertise puppies before they have arrived in the UK, enabling them to list the puppies and show photos of them from a younger age. This may appeal to a buyers' preference for a younger puppy and means that the usual listed age of an imported puppy (16–22 weeks) is avoided. The sellers may advise that the puppies can be collected as soon as they arrive in the UK. This would mean that unsuspecting buyers could pick up a puppy straight after a lengthy journey from Eastern Europe, with the animal having received no health care or veterinary checks.



## 3. No photographs or video of puppies with their mother

Sellers may provide photos of the parents rather than of the puppies with the parents – a strong indicator of illicit sales. Repeat images of previous litters are also often used and some photos provided in adverts can clearly be identified as having been taken abroad, due to the distinct architecture in the background.

## 4. Last minute change of location

Imported puppies being sold from a location different from the one stated in the advert indicates suspicious activity. Illegal puppy sellers can change the viewing location, which reduces their transparency and traceability as well as obscuring the background of the puppy.

## 5. No documentation

Prolific sellers may state that the puppies had a 'full health check' before leaving their country of origin, claiming that travel would not be possible without such measures, but often do not provide any documentation to prove this. Many puppies are sold without having UK veterinary checks before being advertised, and therefore the health status of the puppies remains unknown at sale.



## Our Recommendation: Look Out for Suspicious Adverts

Those looking to purchase a puppy must educate themselves on the myriad of tricks that unscrupulous breeders use to lull potential buyers into a false sense of security.

Buyers must also ask for proof of documentation and ensure they see the puppy with its mother and littermates, making sure they question disconcerting behaviour such as wanting to meet in a public place rather than at the seller's home.



A Gumtree seller advertising a Chow Chow puppy  
© FOUR PAWS



## Case Study 1:

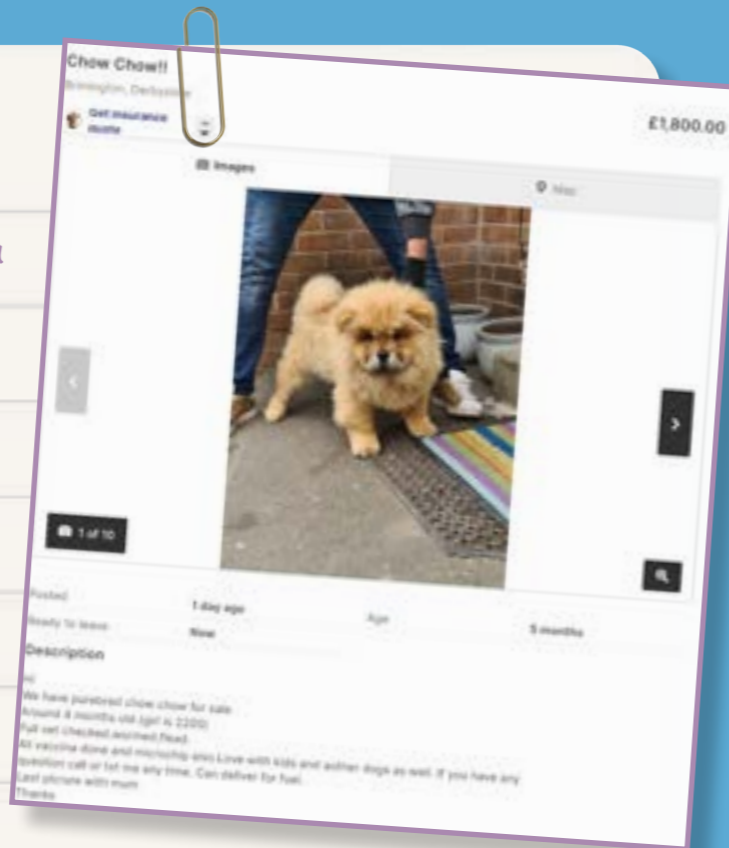
### A Gumtree seller advertising a Chow Chow puppy

The seller of this puppy advertised Chow Chow and French Bulldog puppies using two different locations and three different names, whilst refusing to provide any evidence of paperwork prior to a viewing. He offered to 'deliver for fuel' and provided photos of the puppies' mother rather than photos of the puppies with the mother.

The adverts were typically short and abrupt, with one advert being reposted several times in consecutive weeks rather than new individual adverts being written for new puppies.

A Google Maps search of the address provided by the seller showed that this was an established 'puppy shop' with several negative reviews dating back two years. When undercover investigators visited the property, the 'puppy shop' was advertised on a piece of A4 paper on the garage door. The puppies were kept in the garage in a range of pens and cages but were let into the garden for the viewing. During the second visit, more puppies could be heard in the garage, but access was denied.

Through examination of adverts, basic online searches and a fieldwork visit, this seller was confirmed to be a continuous seller of underage, illegally imported puppies, yet their trade has been openly sustained for years.



## Case Study 2:

### A Gumtree seller advertising a Maltese puppy

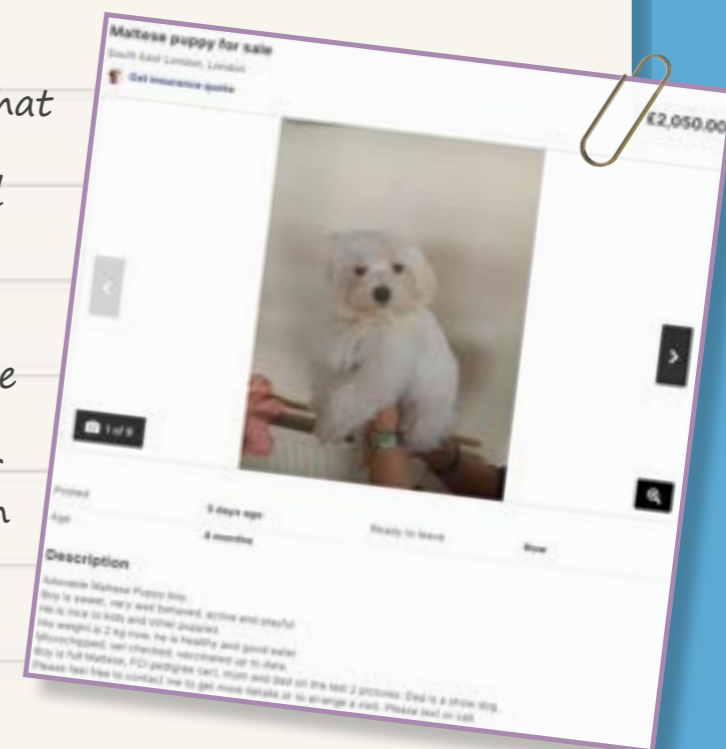
This seller placed 10 adverts for Maltese puppies imported from Lithuania, using six different names across Gumtree, Pets4Homes and FreeAds.

The seller claimed the puppies had FCI pedigree certification and was willing to provide photos of the puppy passport in advance of viewing. However, the seller gave a different location on the advert from their real address, which he stated was due to 'scammers'. He also had a VIP membership on FreeAds, adding to the impression of legitimacy.

The visit to this particular puppy was extremely concerning due to their visibly poor health. The puppy seemed nervous, withdrawn and trembling, with thin fur and evident lethargy. The seller advised investigators that the puppy might have yellow foam coming from her mouth but assured them that 'one day of this would be OK', and that if it went on for longer than one day or occurred with blood or diarrhoea, then investigators should talk to a vet.

In addition, there were substantial discrepancies between the seller's information and the passport details. The seller stated that the puppy was just three-and-a-half months old, despite the passport indicating that the puppy should be five-and-a-half months old. The seller stated that the puppy had arrived two weeks previously. However, the passport suggested that the date of the rabies vaccination would be invalid if the puppy had indeed arrived two weeks ago. The seller also commented that the date on the basic vaccination record was incorrect.

This case is a strong example of the harm caused through the sale of illegally imported puppies.







## OUR RECOMMENDATION: ADVERTISING SITES MUST ADOPT THE VERIPET SYSTEM

Classified advertising sites must implement mandatory identification and registration.

The VeriPet system is an innovative technical solution that makes the online trade safer and blocks market access for illegal puppy dealers.

Already implemented on classified advertising sites in Ireland and Switzerland, VeriPet ensures that any dogs advertised are microchipped and registered. Crucially, the identity of the seller is also recorded.

Having these details will bring an end to the anonymous nature of the trade and ensure that responsible breeders and rehoming organisations can still advertise online, but those evading the law will lose access to the online market.

© FOUR PAWS

## Consequences

### Health Risks

**This unscrupulous trade has dire consequences for both animals and humans.** Puppies that are bred in horrific conditions by breeders who have no regard for animal health are not only at risk of catching infectious diseases, such as parvovirus, brucella and giardia, but are also at risk of spreading them to other animals – and to humans – due to lack of vaccinations.<sup>42</sup>

The cruel conditions in which these puppies live for the first weeks of their lives can also lead to long-term behavioural issues, as this is the critical time for them to learn important behaviours and socialisation skills.<sup>43</sup> Health and behavioural issues often lead to relinquishment or abandonment when owners can no longer afford rising vet bills or cannot cope with the dog's behaviour.

### Hidden Costs

The hidden costs are yet another consequence of the illegal puppy trade. The rise in demand for puppies has caused prices to surge, but it is not just the initial cost that can be eye-watering. Recent estimates show that the average cost of having a dog is now approximately £2,000 a year, or £26,000 over a typical dog's lifetime.<sup>44</sup> These costs can vary dramatically depending on the size, age, breed and health of the dog. Illegally bred puppies are more prone to expensive health complications due to inadequate care taken by the breeder.

According to a YouGov and Dogs Trust poll from November 2022, almost half of dog owners surveyed reported that they were finding it more difficult to give their dog all that it needs due to the 'cost-of-living crisis'.<sup>6</sup> Food banks are increasingly being set up around the country to provide for those who can no longer afford to feed themselves – or their animals.<sup>45</sup>

### Rescue Centres are at Capacity

Across the UK, rescue centres are struggling to cope. The ever-increasing cost of living saw pet abandonment increase by 25% in the first half of 2022 compared with the same period in the previous year, whilst rehoming decreased by 10%.<sup>46</sup>

At the time of writing, Birmingham Dogs Home is at full capacity after receiving 700 requests for rehoming in January 2023 alone, marking an 86% increase in surrender requests since October 2022. In addition, 92% of rescue centres are seeing more people wanting to hand over a dog compared with pre-pandemic numbers.<sup>6</sup>



*A confiscated sick, unvaccinated puppy.*  
© FOUR PAWS



## Case Study 3:

### Christine's Story

In June 2021, Christine responded to an advert on a classified ad site and arranged to meet a litter of West Highland Terrier puppies. She was told that the mother had been separated from them as they were 'not getting on too well', although the seller's story often appeared to be inconsistent. After visiting and discussing vaccinations, microchips, insurance and health checks, Christine was satisfied with the answers that the seller provided and paid her deposit for Poppy, arranging to pick her up four days later.

However, after collecting Poppy, the puppy immediately became unwell, suffering from bloody diarrhoea during the car journey home, which continued through the night. The following day, Christine rushed her to the vet and incurred the first of many vet bills to come.

Poppy's diagnosis was giardia – an intestinal infection caused by a microscopic parasite, and also a zoonotic disease. Christine also found out that Poppy had a heart murmur and that she was full of worms. Weeks of medication and more vet visits followed. Eventually, Christine also caught giardia, becoming unwell and needed antibiotics.

Four months later, when Poppy had become very much a part of the family, Christine noticed she had developed a 'head wobble', which slowly worsened until Poppy could no longer balance or walk without falling. Poppy was soon diagnosed with cerebellar abiotrophy, likely to have been inherited from a parent. Christine was told Poppy would probably not make it to her first birthday.

Poppy's final months were agonising for Christine – she had to purchase nappies for Poppy's incontinence, carry her up and down stairs, and acquire a dog wheelchair so that Poppy could still enjoy her walks. Sadly, at just eight months old, Poppy was put to sleep.

Christine and Poppy should never have had to experience the pain and stress of those eight months. This is just one of many sad stories caused by the illegal puppy trade, with FOUR PAWS receiving close to 100 reports from victims of the trade each month through an online reporting tool.



Poppy using a wheelchair due to disability caused by genetic illness

## The Puppy Trade and the Law

There are several pieces of legislation relating to the welfare of puppies and dogs in the UK. Each of the countries in the UK has slightly different legislation, but they broadly do similar things.

### The Animal Welfare Act 2006,<sup>50</sup> Animal Health and Welfare (Scotland) Act 2006<sup>51</sup> and Welfare of Animals Act (Northern Ireland) 2011<sup>52</sup>

- ▶ The animal welfare acts create several criminal offences that apply to a variety of animals, including domestic dogs.
- ▶ These include offences relating to causing unnecessary suffering, failing to provide for an animal's needs to the extent required by good practice, mutilation, poisoning, tail docking and dog fighting.
- ▶ In Northern Ireland, it is also a criminal offence to abandon an animal, which is defined as leaving an animal unattended and failing to provide for its welfare.

### The Microchipping of Dogs (England) Regulations 2015,<sup>53</sup> The Microchipping of Dogs (Wales) Regulations 2015,<sup>54</sup> The Microchipping of Dogs (Scotland) Regulations 2016<sup>55</sup> and The Dogs (Northern Ireland) Order 1983<sup>56</sup>

- ▶ All dogs in England, Wales and Scotland aged eight weeks and over which are not certified working dogs must be microchipped.
- ▶ In Northern Ireland, dogs should be microchipped before a licence is issued under The Dogs (Northern Ireland) Order 1983 (see below).

### The Dogs (Northern Ireland) Order 1983

- ▶ In Northern Ireland, in many cases, any person who keeps a dog is required to be licensed to do so.

### Pet travel regulations<sup>57</sup>

- ▶ There are different requirements depending on whether the dogs are to be transported for commercial or non-commercial reasons, and whether it is an import or an export.
- ▶ Dogs coming into the UK must have a pet passport or an Animal Health Certificate, which will list the different treatments the dog has received.

### Licensing regulations (breeding and selling)<sup>58, 59, 60, 61, 62, 63, 15</sup>

- ▶ Those breeding three or more litters a year or advertising a business selling dogs must have a licence from the local authority. Operating a licensable activity without a licence is a criminal offence.
- ▶ Any licence granted by the local authority will have

conditions attached, including:

- > Minimum welfare standards
  - > In England, Scotland and Northern Ireland, a prohibition on the sale of puppies under eight weeks of age
  - > In England and Scotland, a requirement for puppies to be shown with their biological mother
  - > In England, Scotland and Wales, a prohibition on the sale of puppies by third-party sellers.
- ▶ Licensed breeders must microchip their puppies before they go to their new homes, with the breeder being the first registered keeper.

### The Animal Welfare (Electronic Collars) (Wales) Regulations 2010<sup>64</sup>

- ▶ Electronic collars, which deliver an electric shock to a dog's neck as a training tool, are banned in Wales. From 1 February 2024, electronic collars will also be banned in England.<sup>65</sup>

### Codes of Practice<sup>66, 67, 68, 69</sup>

- ▶ The UK governments have produced codes of practice which apply to dogs. Breach of the relevant code is not a criminal offence but it may indicate that an offence has been committed, for example, under the Animal Welfare Act 2006.

Despite these laws being in place, the illegal puppy trade is still rife, indicating that more stringent regulations and better enforcement are required.

## Our Recommendation: Stricter Advertising Legislation and Enforcement

Further legislation with stricter enforcement is needed to address these issues, for example, to tackle the increasing use of social media to advertise and sell puppies. It is essential that more is done to enforce the ban of animal sales on social media sites, particularly Instagram and Facebook.

In addition, mandatory legislation must be put in place to enforce the traceability of sellers on classified advertising sites, ensuring that they are held accountable if a puppy develops health problems shortly after purchase. It is now imperative that the provisions outlined in the discarded Animal Welfare (Kept Animals) Bill are framed in separate legislation and passed through Parliament to ensure that puppies cannot be imported under six months of age, thereby helping to considerably reduce the trade.<sup>26</sup>





## Conclusion

### The UK is a key market for the illegal puppy trade.

Puppies are being imported into the UK at an alarming rate. Inadequate water, food and toilet breaks define the excruciatingly long and treacherous journeys that puppies must endure. Thorough border checks are crucial in order to ensure imported puppies are not underage and have the correct paperwork and vaccinations.

The rise of social media has caused a surge in puppies being purchased online from unlicensed breeders, with many becoming critically ill due to a lack of basic health care and their welfare needs not being met by the breeders. Unsurprisingly, potential puppy owners are being lulled into a false sense of security, with misinformation on classified adverts and common tricks being used by sellers to make a quick sale. The fight to bring this lucrative trade to an end is ongoing.

Thankfully, some consumers are becoming increasingly aware of the risks and more astute about the warning signs of unscrupulous breeders, **but much more awareness is needed to truly end this horrific trade.**

Advertising sites have a huge responsibility to end this cruel trade and the anonymity that comes with online sales. Countries such as Ireland and Switzerland have already implemented FOUR PAWS' VeriPet system on classified advertising sites, ensuring that the identity of all sellers is recorded, as well as guaranteeing that all dogs advertised are microchipped and registered. This means that the trade can become fully traceable. We need this system to be adopted in the UK and across Europe to protect countless animals and their owners.

In lock step with the adoption of VeriPet, policy makers must also secure legislation that supports mandatory registration and identification in advertising, as well as ensuring that the provisions in the now dropped Animal Welfare (Kept Animals) Bill, which would have addressed the issue of puppy smuggling, is passed through Parliament under separate legislation.

## Recommendations

Working together with advertising sites, politicians and consumers is key to ensuring a well-rounded approach that will safeguard the welfare of puppies and eliminate the trade.

To achieve an end to the illegal puppy trade:

- ① Potential buyers must do their research and be certain they are ready to take on the responsibility of a puppy. They must undertake adequate research of the breeder and make sure never to buy puppies from social media sites .
- ② The Government must ensure the provisions in the now discarded Animal Welfare (Kept Animals) Bill, which would have addressed illegal puppy smuggling, are introduced in new legislation and passed through Parliament.
- ③ Potential buyers must watch out for suspicious adverts, report cases to our online reporting tool and avoid purchasing via social media sites.
- ④ Classified advertising sites must implement mandatory identification and registration, in the form of the FOUR PAWS VeriPet system, to ensure that any dogs advertised have registered microchips, with the identity of the seller recorded and verified.
- ⑤ The Government must support legislation and better enforcement that supports mandatory identification and registration on classified advertising sites, and clamp down on social media sites that are not enforcing their own policies.

**As the global animal welfare organisation fighting for animals under human influence, we will continue in our fight against this cruel trade.**



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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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