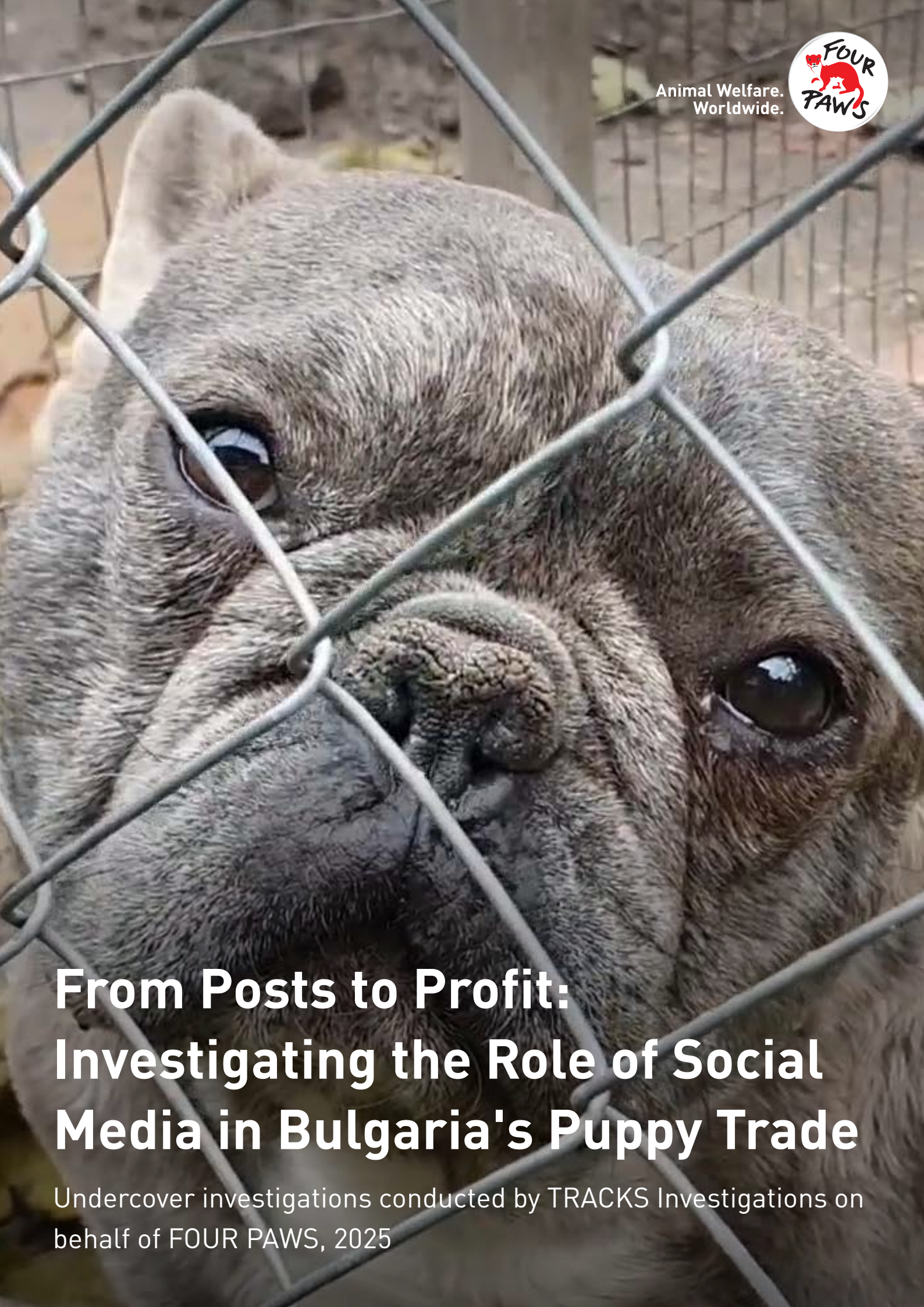

Animal Welfare.
Worldwide.

From Posts to Profit: Investigating the Role of Social Media in Bulgaria's Puppy Trade

Undercover investigations conducted by TRACKS Investigations on behalf of FOUR PAWS, 2025

Executive Summary

The online sale of companion animals has expanded significantly across Europe in recent years. Social media platforms have become a primary channel through which puppies are advertised and sold, offering sellers access to large audiences with minimal oversight and limited transparency. For prospective buyers, this makes it extremely difficult to verify the origin of an animal, the conditions in which they have been bred, or whether the seller is operating in compliance with relevant legislation.

FOUR PAWS has been documenting the scale of this problem for several years. In 2024, it published Social Media vs Reality: How Meta is failing to curb cruel puppy trade on Facebook and Instagram[1], which found that puppy advertisements from private individuals, posted in breach of Meta's own policies, were reaching hundreds of thousands of people in Facebook groups and Instagram profiles across Europe. Since that report's publication, Meta has taken no meaningful action to address the issue.

This report extends that previous work. In 2025, FOUR PAWS commissioned undercover investigators to examine what lies behind puppy advertisements posted on Facebook in Bulgaria: to contact sellers, arrange visits, and document the conditions and practices they encountered. Across eleven field visits, investigators found a trade operating openly on Meta's platforms. Underage animals were offered for sale in public car parks without documentation, and large unregistered breeding facilities supplying buyers across Europe with little traceability and, in the majority of cases, in breach of Bulgarian law. Meetings were successfully arranged with a total of 11 sellers with the following key finding:

- Six out of eleven sellers offered puppies below Bulgaria's legal minimum sale age of eight weeks. In one case, puppies were just 37 days old, barely five weeks.
- Ten out of eleven sellers offered puppies without microchip identification.
- Ten out of eleven sellers failed to provide official EU pet passports.
- Nine out of eleven sellers were confirmed to be operating without breeder registration.
- Several sellers actively sought to avoid traceability, advising buyers to register microchips and passports in their own names after purchase.

- Several sellers indicated a willingness to export puppies to Western Europe before legal age or vaccination requirements had been met.
- In every case investigated, Facebook groups were the primary channel through which puppies were advertised and sales were arranged.

Behind the photographs and descriptions presented in online listings, investigators encountered puppies kept in unsanitary conditions, breeding dogs with untreated injuries, animals suffering from health conditions associated with extreme selective breeding practices, and evidence of illegal mutilations including ear cropping and tail docking.

They reflect the inevitable consequences of a system in which Meta's platforms provide a large, accessible and insufficiently monitored marketplace for individuals breeding and selling puppies illegally. The platform's failure to enforce its own policies enables this trade to continue openly and at scale.[1]

FOUR PAWS calls on Meta to take urgent and necessary action in response to the evidence presented in this report. FOUR PAWS also calls on Bulgarian authorities to strengthen enforcement of existing legislation, which is being routinely disregarded. Prospective puppy buyers are strongly advised to avoid purchasing dogs through social media altogether and to seek animals only from licensed shelters or registered breeders.

Note: The eleven investigations documented in this report are illustrative rather than representative. They do not reflect the full scale of the online puppy trade in Bulgaria. However, they offer a reliable window into the kinds of practices that lie behind puppy advertisements posted repeatedly on social media platforms, and demonstrate how illegal breeders, some operating extensive, long-running commercial enterprises, use Facebook as their primary sales channel.

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Introduction

The illegal puppy trade: background and risks

The illegal puppy trade causes harm at scale. For the animals involved, it can mean overcrowded and unsanitary living conditions, absent or inadequate veterinary care, and premature separation from their mothers. Breeding dogs are often the least visible victims, kept in poor conditions and bred repeatedly with no regard for their health or wellbeing. Puppies may be sold with untreated injuries or underlying health conditions, transported at far too young an age, and handed over with no documentation. The welfare of both the puppies and the animals used for breeding is routinely sacrificed in favour of profit.

For buyers, it can mean heartbreak and significant financial cost when the puppy they purchased falls ill or dies. For society, it represents a failure of traceability and accountability in a market that continues to grow.

The specific risks to buyers include:

- Health risks: some diseases carried by illegally bred or imported puppies are zoonotic and can be transmitted to humans.
- Emotional risks: many puppies from the illegal trade develop serious health problems or die shortly after purchase.
- Financial risks: buyers frequently face high veterinary bills to treat conditions associated with poor breeding or inadequate early care.
- Legal risks: buyers who unknowingly purchase an illegally imported puppy may face quarantine fees, and in some countries the animal may be confiscated or euthanised.
- Fraud risks: sellers may provide falsified vaccination certificates, incorrect microchip details or fraudulent pet passports to conceal the true origin of the animal.

FOUR PAWS' work to end the illegal puppy trade online

Social media has become an increasingly significant channel for puppy sales. In 2022, FOUR PAWS' Pandemic Pups report found that 39% of puppy buyers had seen their dog advertised on social media, with 32% on Facebook or Instagram specifically[2]. In Bulgaria, the problem was found to be particularly widespread: half of all Bulgarian respondents had brought their puppy home below the legal minimum age, with a third having done so at just five to six weeks old. With EU regulations expected to tighten restrictions on puppy sales through classified ad websites, the use of social media as a sales channel is likely to increase further.

In 2024, FOUR PAWS published the report Social Media vs Reality: How Meta is failing to curb cruel puppy trade on Facebook and Instagram[1], a detailed investigation into the scale of the trade across Meta's platforms and the platform's failure to enforce its own rules and policies. That investigation found that of 167 Facebook

groups surveyed across Austria, Germany, France, the Netherlands, Switzerland and the UK, 96 contained puppy advertisements from individuals who could not be verified as registered businesses, in breach of Meta's own policies. Those groups had a combined audience of more than 389,000 members by June 2024.

In Bulgaria specifically, 36 out of 40 (91%) Facebook groups surveyed were found to contain likely private puppy sale advertisements, with a combined audience of more than 218,000 members. Of 179 Instagram profiles surveyed across all countries, 57 carried similar advertisements. Since that report's publication, FOUR PAWS has gathered over 100,000 petition signatures, met with Meta's policy team, and conducted undercover investigations in the UK, the Netherlands and Belgium. Meta has taken no meaningful action in response.

This report adds Bulgaria to that growing body of evidence. Across every country investigated, the same patterns have emerged: illegal sales, animal suffering, and a trade operating openly on Meta's platforms. These findings do not describe a localised or incidental problem. They describe a systemic failure by Meta to prevent its platforms from being used to facilitate an illegal and cruel trade, across multiple European countries and over several years.

Why this investigation was carried out

This investigation was commissioned to establish what lies behind puppy advertisements on Meta's platforms in Bulgaria. The starting point was not an assumption of illegality, but an intention to go beyond the screen and document the reality behind the listings.

What investigators found bore little resemblance to what the online listings suggested. Behind seemingly innocent photographs of puppies posted on social media lay a very different reality. Animals with untreated health conditions, breeding facilities operating without registration or oversight, sellers routinely and openly disregarding the legal requirements that exist to protect both animals and buyers.

The scale of non-compliance encountered across just eleven sellers was striking. Investigators were not searching for the worst cases. They were responding to ordinary advertisements in widely used Facebook groups. The illegalities documented in this report are not exceptional: they appear to be routine conformation of the trade on Meta's platforms.

This investigation also demonstrates how Meta's platforms have become a preferred marketplace for sellers operating illegally. In every case investigated, Facebook groups were the primary channel used to advertise puppies and arrange sales. The platform's failure to enforce its own policies is one of the central reasons this trade continues to thrive online.

Investigation

Methodology and scope

Investigators from TRACKS Investigations Ltd (UK) identified sellers advertising puppies through Facebook groups, Facebook profiles and, in a small number of cases, Instagram. Using undercover profiles, investigators contacted sellers and arranged visits to view puppies offered for sale.

A total of eleven field visits were conducted across multiple locations in Bulgaria in 2025. During these visits, investigators documented:

- the age and apparent condition of puppies.
- housing and breeding conditions.
- the presence and condition of adult breeding dogs.
- documentation provided by sellers.
- evidence of veterinary treatment or vaccination.
- the circumstances in which puppies were offered for sale.

Evidence collected during the investigation included screenshots of advertisements, photographs and video recordings taken during visits, and copies of veterinary documents where these were provided.

Instagram appeared to play a far smaller role in the investigation than Facebook. Only a limited number of interactions with sellers were confirmed through that platform. Facebook groups were consistently the primary channel used to advertise and arrange puppy sales.

Key findings from the investigation

Volume of the trade: puppies offered on Facebook in Bulgaria

Across all eleven sellers investigated, Facebook groups were the consistent and primary marketplace for puppy sales. Sellers posted advertisements in multiple groups dedicated to dog breeding and pet sales, reaching large audiences quickly and communicating privately with potential buyers. Unlike Facebook Marketplace, groups are more difficult to monitor and regulate, allowing sellers to evade oversight and enforcement more easily. The volume and regularity of advertisements encountered during the investigation suggest these are not casual or one off sales: several sellers maintained what appeared to be a continuous supply of puppies for sale.

Instagram played a comparatively minor role. Only one seller out of eleven was confirmed to be actively using Instagram alongside Facebook to advertise.

Deceptive techniques used by sellers

Beyond legal breaches, investigators observed a number of consistent tactics used by sellers to conceal the circumstances in which puppies were bred and sold. Buyers responding to Facebook advertisements are unlikely to be aware of these techniques.

Meeting buyers away from breeding premises

Several sellers arranged exchanges in petrol stations, roadside laybys or public car parks, specifically preventing buyers from seeing where or how puppies had been bred. Under Bulgarian law, microchipping and issue of passports must be completed before a puppy is sold. Sales of this nature can make this requirement impossible to verify or enforce.

Falsely claiming documentation is not required

Some sellers told investigators that microchipping and passports are only required if the buyer plans to travel abroad with the animal, or suggested it would be 'easier' for the buyer to arrange documentation themselves after purchase, meaning the dog would be registered to the buyer rather than the breeder. Both claims are false. Under Bulgarian law, the first owner (the breeder/seller) is responsible for microchipping and issuing an EU pet passport before the puppy is sold.

Avoiding price disclosure on Facebook

Several sellers deliberately omitted prices from their Facebook advertisements. This is a recognised technique used to avoid automated detection on Meta's platform: advertisements that do not state a price are less likely to be flagged as commercial sales activity.

Withholding access to breeding areas

In a number of cases, sellers refused to allow investigators to see breeding facilities or the mother of the litter. This prevents buyers from assessing the conditions in which puppies have been bred.

Using incomplete documentation

Several sellers provided local veterinary health booklets in place of official EU pet passports. Local health records do not carry the same legal status and do not satisfy identification and traceability requirements under Bulgarian or EU law.

Animal welfare issues encountered

Investigators consistently encountered welfare conditions that contradict the healthy, well cared for impressions created by online listings. Key issues observed across the eleven visits included:

- Puppies kept in unsanitary conditions, including crates and whelping boxes contaminated with faeces.
- Puppies showing visible signs of illness including trembling, eye discharge, eye malformations and signs of parasite infestation.
- Puppies separated from their mothers prematurely and transported in inappropriate conditions.

- Adult breeding dogs with untreated injuries, chronic ear infections, severe eye discharge and extreme conformation related health problems.
- Ear cropping and tail docking which are surgical mutilations that are illegal in Bulgaria.
- Merle to merle breeding pairings, which are associated with serious genetic disorders including blindness and deafness in offspring. One puppy showed obvious signs of ocular malformations consistent with these genetic defects.
- Overcrowded kennel environments with multiple litters and breeds held together simultaneously.
- Adult breeding dogs chained outdoors.

Puppies are not the only victims of this trade. The breeding dogs behind these sales, particularly females used for repeated reproduction, suffer conditions that buyers rarely see and that are seldom subject to any scrutiny. In several cases, investigators observed adult dogs kept in confined kennels with no evidence of enrichment, adequate veterinary care or appropriate living conditions. Once no longer commercially useful, these animals may be discarded or abandoned. Their suffering is rarely reflected in the online listings that advertise their offspring.

Legal breaches identified

The investigation identified repeated breaches of Bulgarian legislation governing the breeding and sale of companion animals across the majority of sellers investigated. The table below summarises key indicators of non-compliance.

Indicator	Law in breach[3-5]	Number of sellers	Percentage
Sellers investigated		*11*	*100%*
Puppies offered without microchip	Art. 72 of Ordinance No. 41 of 10 December 2008	10	91%
Puppies offered without passport	Art. 72 of Ordinance No. 41 of 10 December 2008	10	91%
Confirmed unregistered breeders	Art. 35 (5) of the Animal Protection Act	9	82%
Puppies offered below legal sale age	Art. 20 of Ordinance No. 41 of 10 December 2008	6	55%
Evidence of potentially sick puppies	Art. 14 (1) and Art. 70 of Ordinance No. 41 of 10 December 2008	6	55%
Puppies offered with cropped ears or docked tails	Art. 177 (1) of the Veterinary Practice Act	3	27%
Written puppy care information provided	Art. 13 (2) and (3) of Ordinance No. 41 of 10 December 2008	0	0%

Table 1: Evidence summary of legal breaches across investigated sellers

Failures relating to microchipping, passports, breeder registration, and minimum sale age were widespread and not isolated incidents across the cases investigated.

Case studies

The following case studies illustrate the practices documented during the investigation. Each begins with the Facebook advertisement and is followed by a summary of what investigators found on the ground, the animal welfare concerns observed, and the legal breaches identified.

Case study 1: Puppies kept in faeces-covered crates inside apartment

Platform: Facebook group

Investigators responded to an advertisement for French Bulldog puppies posted in a Facebook group (Figure 1).

Figure 1: Screenshot of advertisement of French Bulldog puppies in a Facebook group.

The seller agreed to a visit at a residential apartment. On arrival, the apartment smelled strongly of dog faeces. Eight puppies, aged 46 days (well below the legal minimum of 56 days) were kept in makeshift crates assembled from dismantled furniture (Figure 2, Figure 3). The base of each crate was covered in faeces. No clean bedding or water was visible.

"Eight French Bulldog puppies were kept in crates made from dismantled furniture, with the base covered in faeces." – Investigator

Figure 2: French Bulldog puppies for sale in a dirty whelping box (dismantled furniture) containing faeces.

Two of the merle coloured puppies appeared to have eye malformation (strabismus and microphthalmos), likely attributable to the merle to merle breeding pairings used by the seller (Figure 3, Figure 4).

Figure 3: French Bulldog puppies in dirty whelping box. The two mainly white puppies appear to have eye malformations (strabismus and microphthalmos).

Figure 4: Close up of French Bulldog puppy with eye malformation.

Investigators later observed five adult breeding dogs kept in ramshackle outdoor kennels (Figure 5, Figure 6). One female had a visibly deformed leg, caused by an insufficiently treated injury (Figure 7). Breeding dogs showed severely narrow nostrils and chronic eye discharge consistent with conditions associated with extreme brachycephalic conformation, which prevents sufficient breathing (Figure 8). The seller stated, that one dog was kept on a chain within the kennel because she would start fights with the other dogs, indicating the high stress level.

The seller confirmed that Facebook groups were their primary sales channel.

Figure 5: Breeding dogs kept in ramshackle kennel.

Figure 6: Close up of outdoor kennels housing the breeding dogs. Note the food leftovers and the dirty, rusty water bucket.

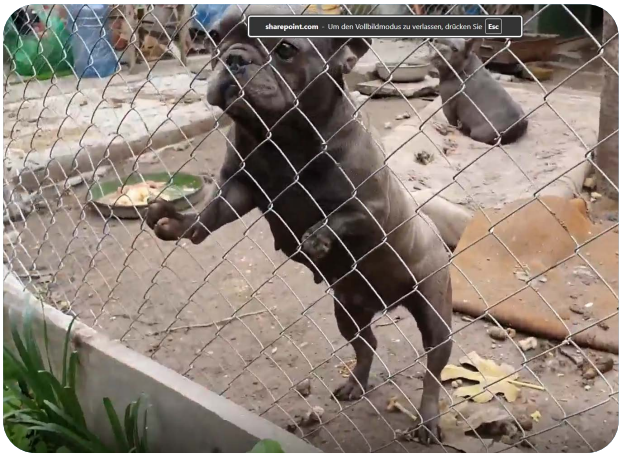

Figure 7: Close up of the female breeding dog with a deformed left front leg.

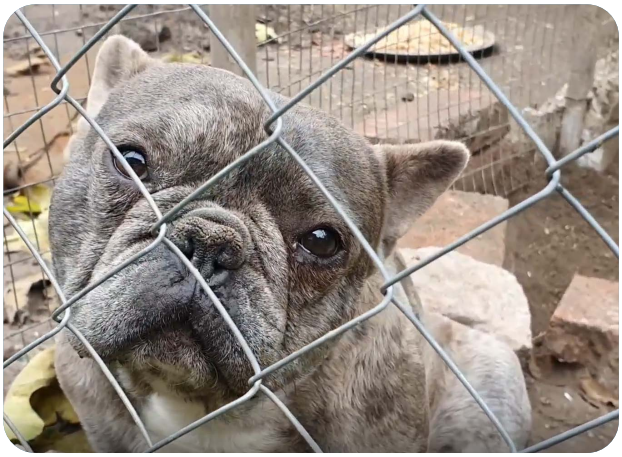

Figure 8: Close-up of a breeding dog with extreme conformation. The dog shows eye discharge and slit-like nostrils. Note the food leftovers in the background.

Animal welfare concerns in case study 1:

- Puppies in faeces contaminated crates with no bedding or clean water.
- Eye malformations in merle coloured puppies consistent with double merle breeding.
- Adult breeding dog with deformed leg.
- Adult breeding dogs with chronic respiratory and eye problems due to extreme conformation.
- Outdoor kennels in poor condition with dirty water and food waste present.

Potential legal breaches:

- Puppies offered below legal minimum sale age of 56 days.
- No microchip identification and registration.
- No official EU pet passport.
- Suspected unregistered breeding activity.
- Suspected failure to ensure animals offered for sale are in good health.

Case study 2: Large breeding operation with overcrowded conditions

Platform: Facebook group

Investigators visited a residential property where Poodle and Pomeranian puppies were advertised for sale through Facebook groups.

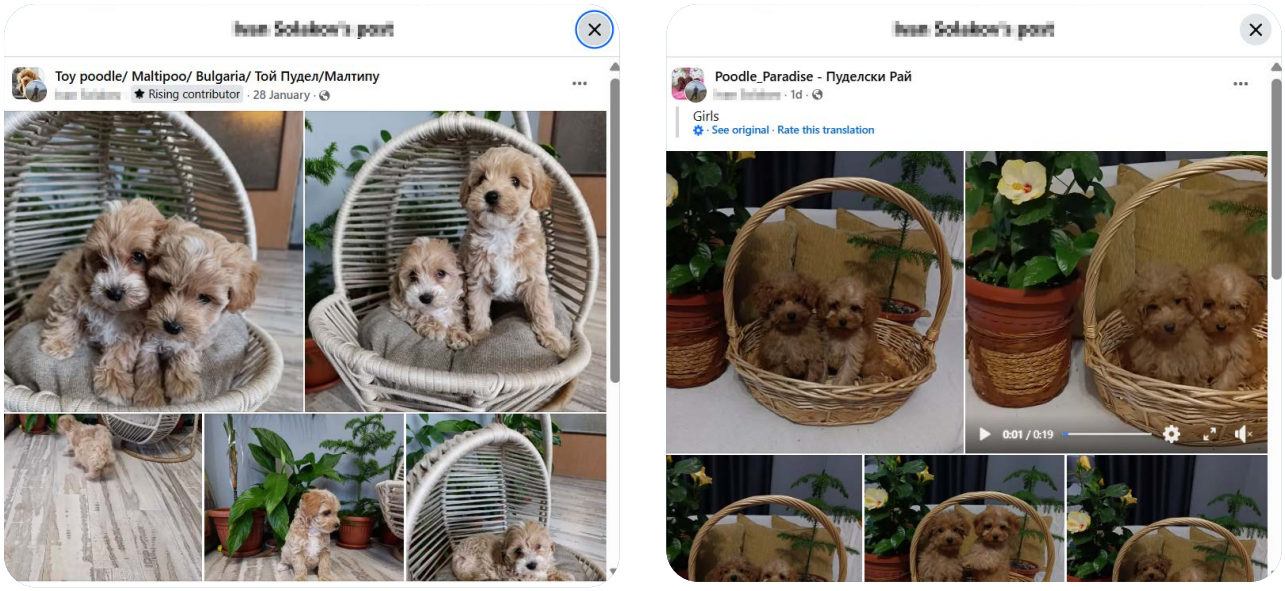

Figure 9: Screenshots of advertisements of poodle puppies in two (a, b) different Facebook groups.

Behind the main property, a large kennel structure housed numerous adult breeding dogs. More than twenty adult females of different dog breeds were confined in a single enclosure (Figure 10, Figure 11). Several appeared listless or in poor physical condition. One female showed severe alopecia (hair loss; Figure 12); many had pronounced eye discharge and heavy tear staining (Figure 13). Puppies were presented without microchips or official passports.

Figure 10: Overcrowded outdoor kennels housing multiple bitches of diverse breeds.

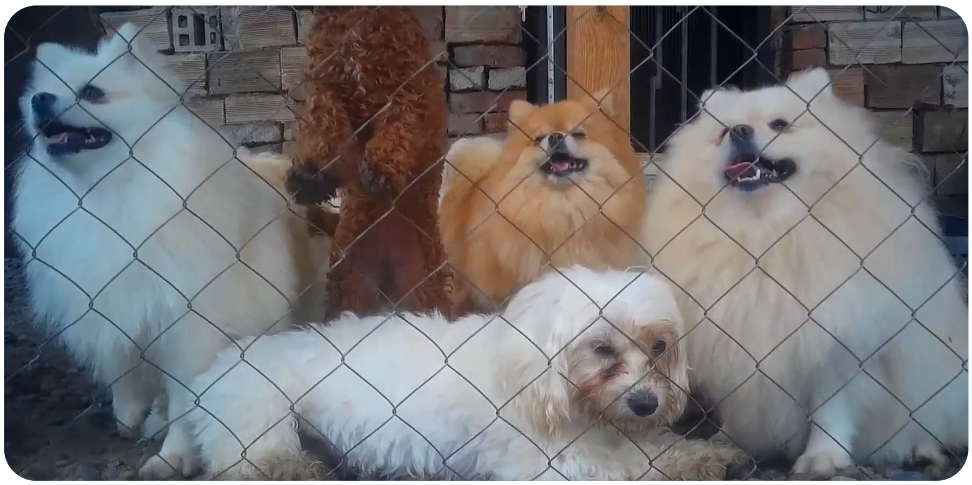

Figure 11: Close up of an overfilled kennel housing multiple bitches. The one in the front appeared listless and in poor physical condition.

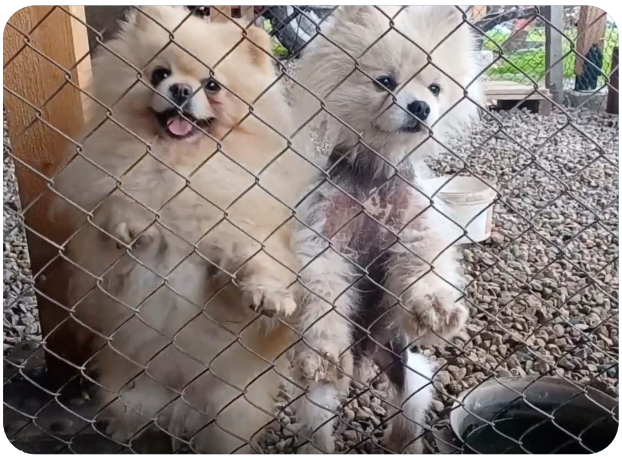

Figure 12: Pomeranian breeding dogs in an outdoor kennel. The dog on the left shows eye discharge, and the dog on the right presents with severe alopecia.

Figure 13: Whelping box of another litter. Note the severe eye discharge and tear staining of the mother in the front and poor bedding and contaminated food of the puppies behind.

"More than twenty adult females were observed in a single enclosure." – Investigator

The operation appeared to run continuously, with multiple litters of different breeds present simultaneously. The seller's family confirmed that Facebook groups were their main channel for sales.

Animal welfare concerns in case study 2:

- Over twenty adult breeding females kept in a single overcrowded enclosure.
- Adult dogs showing severe alopecia, eye discharge and poor physical condition.
- Multiple litters and breeds kept together without separation.
- Seller could not tell which puppies came from which mother.
- No evidence of enrichment or appropriate veterinary care.

Potential legal breaches:

- Puppies offered without microchip identification.
- Puppies offered without official EU pet passport.
- Suspected unregistered breeding establishment.

Case study 3: Breeder supplying puppies for export

Platform: Facebook group

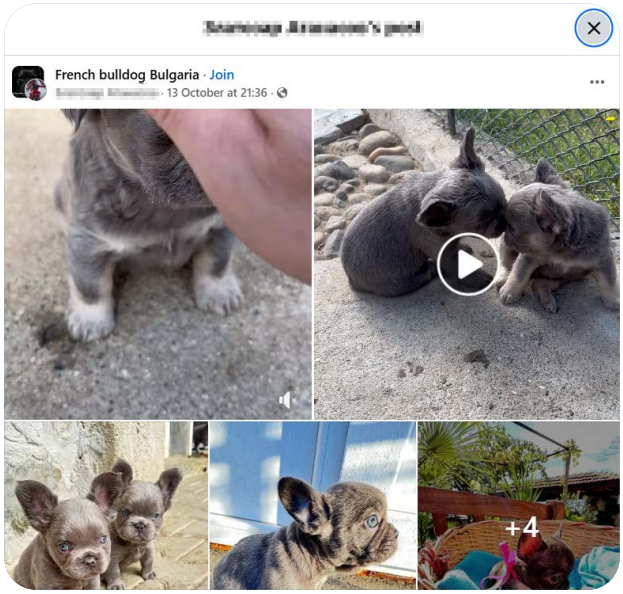

Figure 14: Screenshot of corresponding advert in Facebook group.

Investigators visited a substantial breeding facility with multiple adult French Bulldogs (Figure 15). The seller confirmed that Facebook was their primary platform and that puppies have been sold to buyers in Western Europe.

"The seller confirmed that Facebook was their main platform for selling puppies."
– Investigator

Figure 15: Extensive outdoor kennelling in a breeding facility.

The puppies had not been microchipped or issued passports. The seller suggested that identification could be arranged after purchase. Investigators were told that puppies could be exported shortly after sale.

During the visit, the seller also confirmed that the breeding female used to "produce" the current litter had originally been imported illegally from the United Kingdom without necessary documentation or vaccination.

Several adult breeding dogs showed chronic health conditions consistent with extreme brachycephalic conformation, including severely narrow nostrils and chronic ear infections (Figure 16 - 20). Puppies offered for sale showed submissive and stress-related behaviour (Figure 17).

Figure 16: French Bulldog puppies for sale with extreme conformation.

Figure 17: Close-up of a puppy (11w) for sale with extreme conformation (extreme nasal fold, so called "rope" and narrow nostrils) and submissive behaviour.

Animal welfare concerns in case study 3:

- Puppies showing stress-related and submissive behaviour.
- No bedding or enrichment in puppy housing.
- Adult dogs with chronic eye discharge, respiratory problems and ear infections.
- Breeding dogs with extreme conformation associated with ongoing health problems.

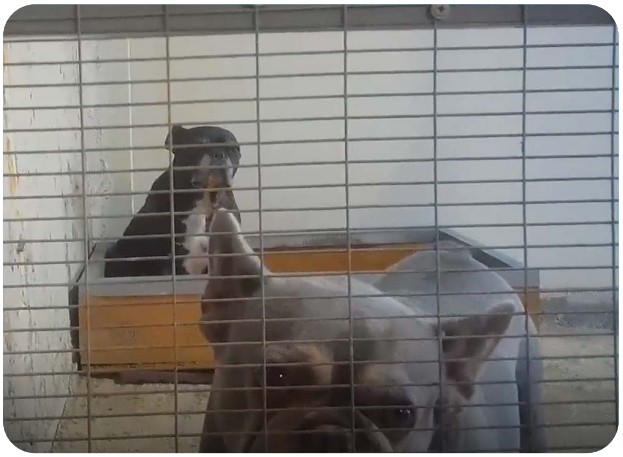

Figure 18: Breeding dog in front with left-sided head tilt indicating a chronic ear infection.

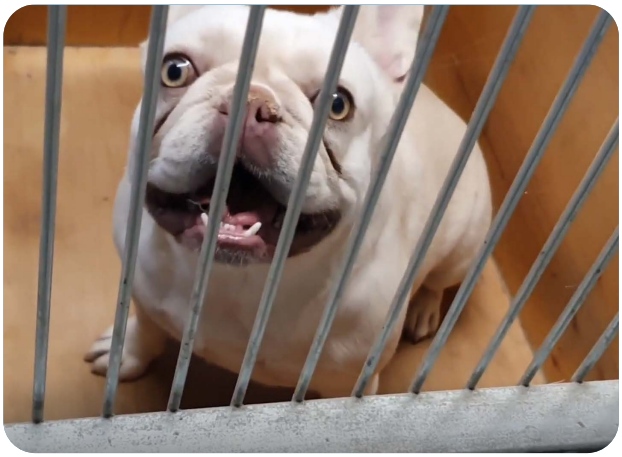

Figure 19: Close-up of breeding dog with extreme conformation, showing chronic ocular discharge.

Potential legal breaches:

- Puppies offered without microchip identification.
- Puppies offered without official EU pet passport.
- Possible non-compliance with EU pet travel requirements for cross-border sales.
- Unregistered breeding activity. Sellers confirmed they have been breeding for 10 years, but stopped registering the dogs under their name as they had too many.
- Breeding female confirmed as illegally imported without documentation and rabies vaccination.

Figure 20: Close-up of breeding dog with severely narrow nostrils.

Case study 4: Underage Pomeranian puppy sold in petrol station car park

Platform: Facebook group

Investigators arranged to meet a seller through Facebook (Figure 21). At the seller's request, the exchange took place in a petrol station car park rather than at the breeding location.

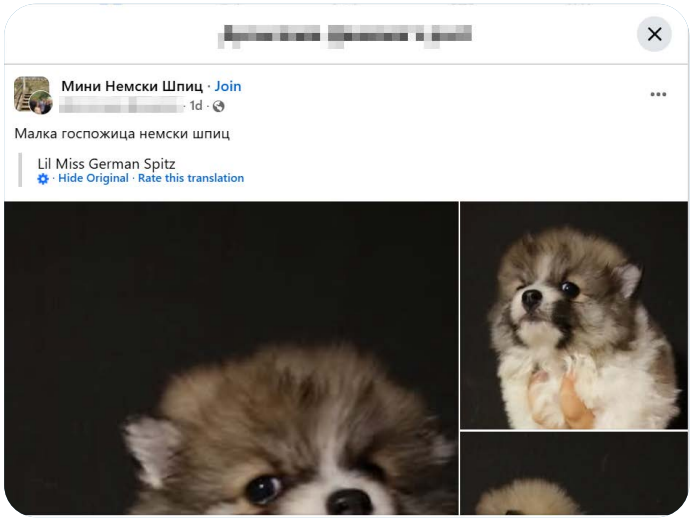

Figure 21: Screenshot of corresponding advert in Facebook group.

The Pomeranian puppy, approximately 52 days old, was brought directly to the meeting for sale.

The puppy had no microchip and the seller confirmed they were not registered as a breeder. The puppy appeared timid, with visible eye discharge and dirt in the fur suggesting health concerns. No documentation was provided.

"We met the seller in a petrol station car park where the puppy had been brought for immediate sale." – Investigator

The offsite meeting prevented investigators from establishing the conditions in which the puppy had been bred.

Animal welfare concerns in case study 4:

- Puppy displaying signs of stress-related and fear behaviour.
- Visible eye discharge and poor coat condition.

Figure 22: Close-up of Pomeranian puppy for sale. Note the submissive behaviour and extensive tear staining.

Potential legal breaches:

- Puppy offered below legal minimum sale age of 56 days.
- No microchip identification.
- Unregistered breeder confirmed.

Case study 5: Chihuahua puppy sold in roadside layby

Platform: Facebook group

Investigators met a seller advertising a Chihuahua puppy through Facebook in a roadside layby (Figure 23). The puppy was approximately 47 days old, nearly three weeks below the legal minimum sale age. The puppy was shaking severely, either stressed/anxious or hypothermic (Figure 24).

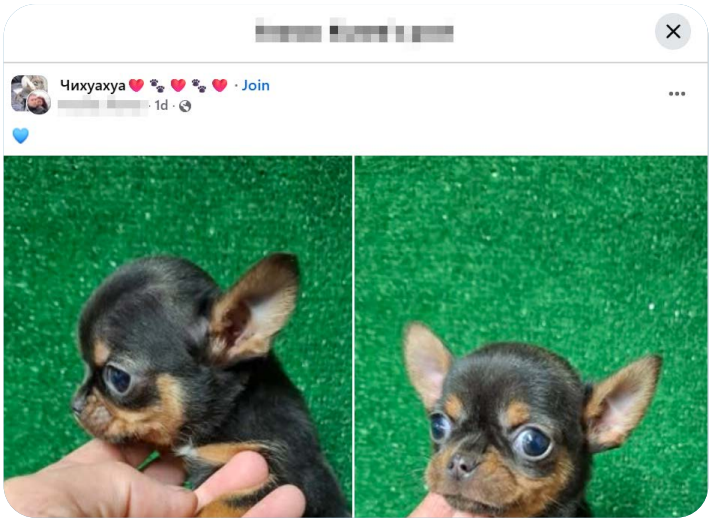

Figure 23: Screenshot of corresponding advert in Facebook group.

"The puppy was transported in a cat carrier in the boot of the vehicle." – Investigator

The seller provided only a local vaccination booklet instead of an official EU pet passport. The seller confirmed that the buyer would need to arrange microchipping after purchase, placing the legal obligation incorrectly on the buyer. The off-site handover prevented any assessment of breeding conditions.

Animal welfare concerns in case study 5:

- Separated from mother and transported at just 47 days old.
- Puppy was stressed/anxious or hypothermic (shaking severely).

Figure 24: Chihuahua puppy for sale. Note the eye discharge and stressed/anxious posture.

Potential legal breaches:

- Puppy offered below legal minimum sale age.
- No microchip identification.
- No official EU pet passport.

Case study 6: Pomeranian puppy offered without identification

Platform: Facebook group and Instagram

Investigators visited a residential property where a 50 day old Pomeranian puppy was advertised for sale on both Facebook and Instagram (Figure 25, 26). The puppy was offered without a microchip and seemed severely stressed during the visit (Figure 27).

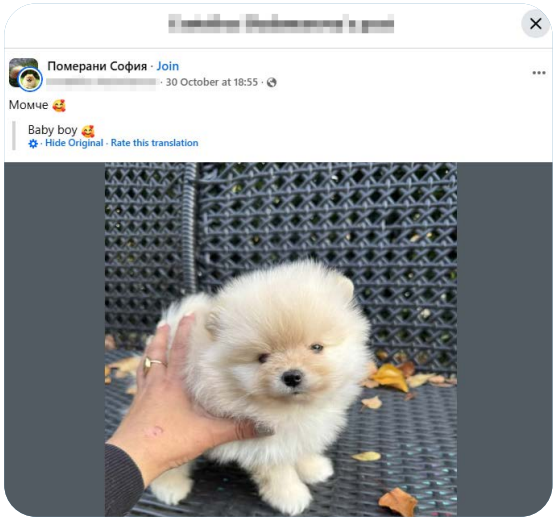

Figure 25: Screenshot of corresponding advert in Facebook group.

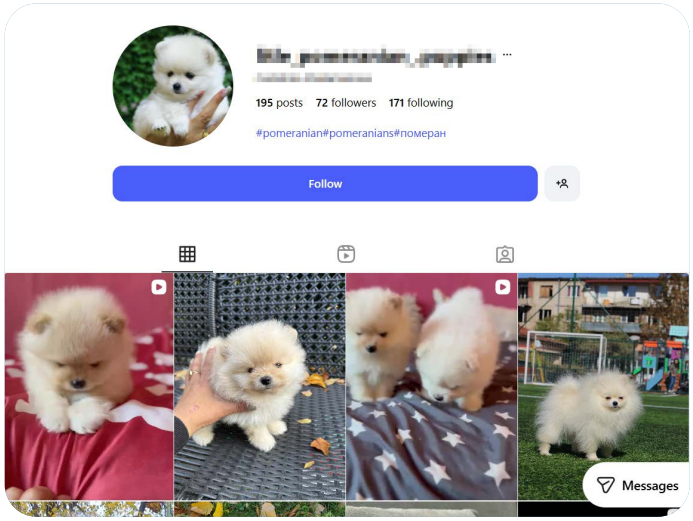

Figure 26: Screenshots of corresponding advert on Instagram.

"The puppy appeared timid and was trembling during the visit." – Investigator

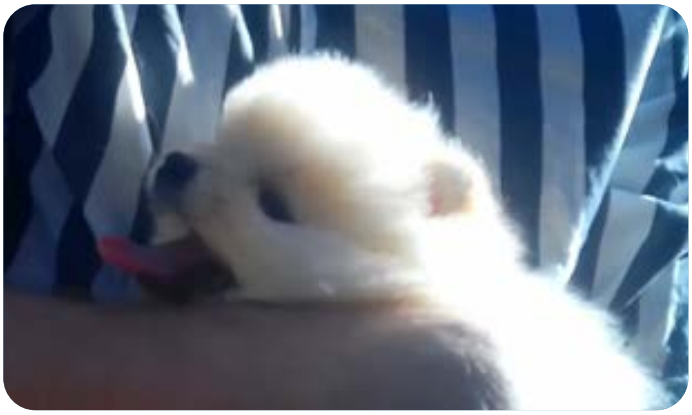

Figure 27: Pomeranian puppy offered for sale. Showed signs of severe stress (yawning, licking, panting, trembling).

Investigators observed several adult dogs at the property, including a breeding male who had lost an eye following a fight with another dog (verbal information provided by the seller, Figure 28). The adult dogs present were poorly groomed, with matted fur and heavy tear staining (Figure 29).

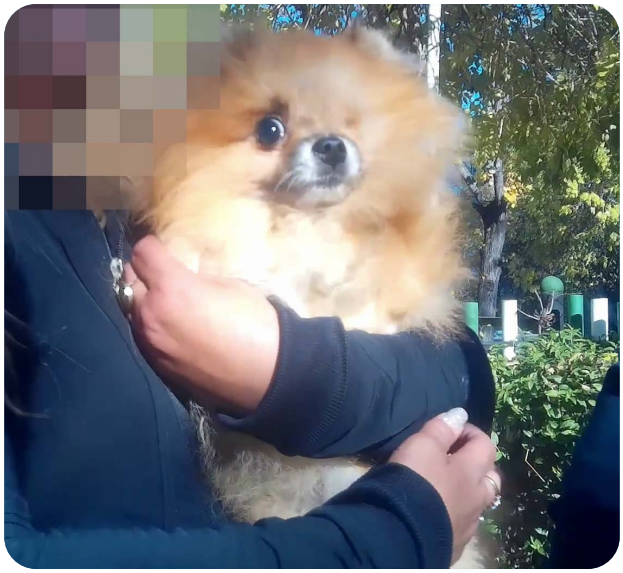

Figure 28: Breeding adult male, missing one eye after a dog fight.

Figure 29: Ungroomed adult dog with tear staining and matted fur.

Animal welfare concerns in case study 6:

- Puppy showing severe stress-related behaviour: yawning, licking, panting and trembling.
- Adult dogs with poor grooming, matted fur and tear staining.
- Breeding dog missing an eye following fight with another male dog.

Potential legal breaches:

- Puppy offered below legal minimum sale age (50 days).
- No microchip identification.
- Suspected unregistered breeder.

Case study 7: Underage puppies with cropped ears and docked tails

Platform: Facebook group

Investigators visited a rural property where Alabai puppies aged 37 days (verbal information provided by the seller, the youngest puppies encountered during the entire investigation) were offered for sale. The puppies were advertised for sale on Facebook (Figure 30).

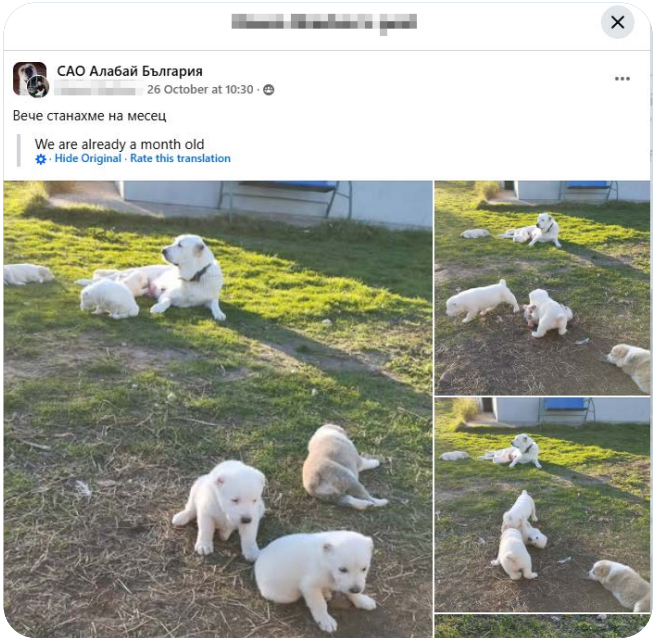

Figure 30: Screenshot of corresponding advert in Facebook group.

The puppies had recently undergone ear cropping and tail docking, both of which are illegal in Bulgaria (Figure 31).

"The puppies were just 37 days old and could be taken immediately." – Investigator

Figure 31: Alabai puppies with cropped ears.

The breeding adults were kept chained near outdoor kennel structures. No microchip documentation was available for any of the puppies (Figure 32).

Figure 32: Mother with cropped ears kept on a chain and two puppies with cropped ears and docked tails next to her.

Animal welfare concerns in case study 7:

- Puppies with recent surgical mutilations (cropped ears and docked tails).
- Puppies just 37 days old (less than half the legal minimum sale age).
- Adult breeding dogs kept chained outdoors.

Potential legal breaches:

- Puppies offered well below legal minimum sale age.
- Illegal ear cropping and tail docking.
- No microchip identification.

Case study 8: Alabai puppies kept in sparse kennels

Platform: Facebook group

Investigators visited a property where Alabai puppies aged approximately 45 days were offered for sale on Facebook (Figure 33). The kennels were sparse, with a strong smell of faeces. Multiple dogs were kept in small in kennels, jumping against the fences, creating a highly stressful environment (Figure 34). The presented puppies showed fear behaviour and stress responses (Figure 35). At least two puppies showed a limp and signs of diarrhoea. Adult breeding dogs had pressure sores on their legs and cropped ears (Figure 36).

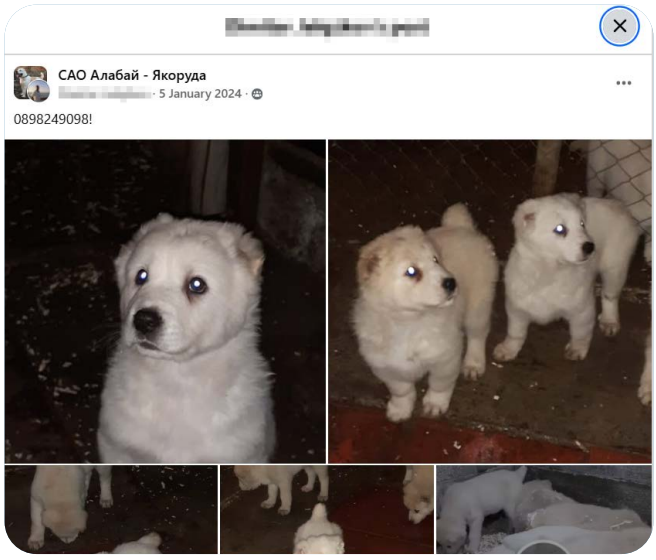

Figure 33: Screenshot of corresponding advert in Facebook group.

"The kennels were sparse and there was a strong smell of faeces." – Investigator.

Figure 34: Outdoor kennels of the breeding dogs. Note the dogs barking and jumping against the fences in this highly stressful environment.

Figure 35: Close-up of puppy with cropped ears. Note the submissive posture and stress display (face).

Figure 36: Close-up of a kennel with dirty water bucket of an adult breeding dog. Note the cropped ears of the dog.

Animal welfare concerns in case study 8:

- Puppies showing fear behaviour and stress responses.
- At least two puppies showed a limp and signs of diarrhoea.
- Dirty kennel environment with strong faecal odour.
- Adult dogs with pressure sores and cropped ears in a high-stress environment.

Potential legal breaches:

- Puppies offered below legal minimum sale age.
- Illegal ear cropping.
- Possible unregistered breeder.

Case study 9: Breeder offering cropped-ear Pocket Bullies

Platform: Facebook group

Investigators visited a breeder selling pocket bully puppies through Facebook (Figure 37). The seller suggested microchips and passports could be arranged after purchase, and recommended a 'transportation company' for cross-border dog sales within Europe (Figure 38). Multiple litters (Figure 39) and additional outdoor kennels housing multiple Maltese dogs were present. Puppies had recently undergone ear cropping, with sutures still in place (Figure 40).

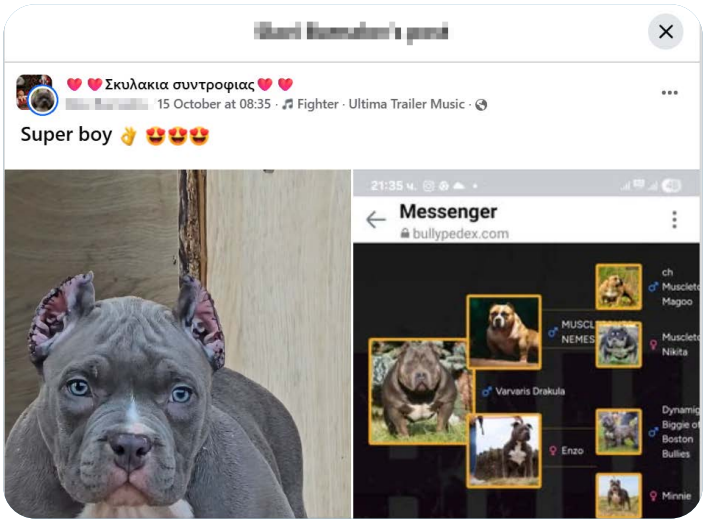

Figure 37: Screenshot of corresponding advert in Facebook group.

Figure 38: Recommended 'transportation company' for cross-border dog sales across Europe.

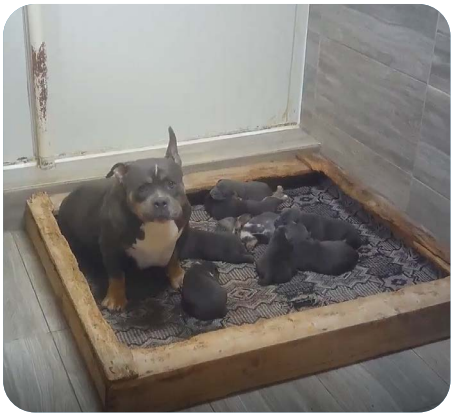

Figure 39: Whelping box with another bitch and her litter.

Figure 40: Pocket bully puppy for sale with cropped ears (sutures are in place).

"The seller suggested identification could be arranged after purchase." – Investigator.

Adult breeding dogs on the property showed extreme physical characteristics including severe muscular hypertrophy, spinal malformation and deformed front legs (probably due being overweight/muscular hypertrophy, Figure 41). A Maltese dog in an outdoor kennel had a visible eyelid tumour with no evidence of veterinary treatment (Figure 42).

Figure 41: Breeding dog with extreme conformation conformation.

Figure 42: The dog in the foreground showed a visible eyelid tumour.

Animal welfare concerns in case study 9:

- Puppies with recent surgical wounds from illegal ear cropping.
- Adult dogs with extreme conformation and significant skeletal deformities.
- Visible eyelid tumour in a Maltese dog with no treatment evident.

Potential legal breaches:

- Illegal ear cropping.
- Active avoidance of identification and traceability requirements.
- Facilitation of cross-border trade potentially in breach of EU pet travel regulations.

Case study 10: Seller refusing access to view breeding conditions

Platform: Facebook group

Investigators visited a residential property where two Pomeranian puppies were presented for sale in prepared pens in the front yard. Puppies were advertised on Facebook (Figure 43). The seller refused access to the area where the dogs were actually kept (Figure 44). No microchip or passport documentation was provided.

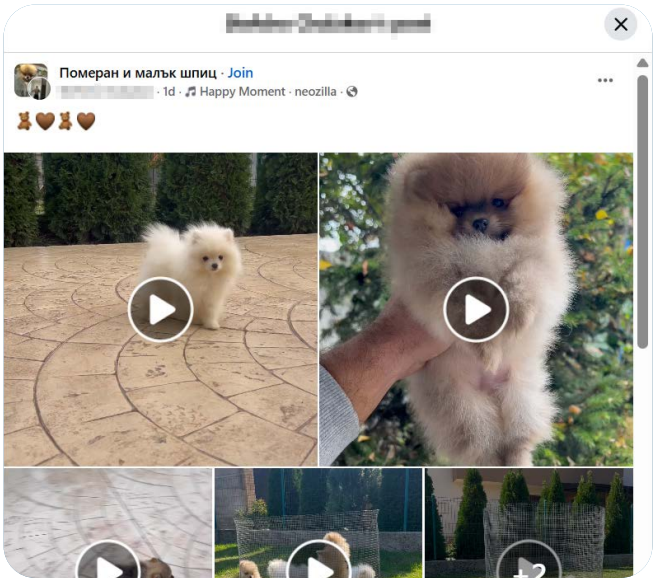

Figure 43: Screenshot of corresponding advert in Facebook group.

"The seller refused access to the area where the dogs were kept." – Investigator

Figure 44: Puppies (left dog 10 weeks, right dog 4.5 months old) for sale kept in small enclosures without access to food or water and potential injury risk.

The puppies showed stress-related behaviour. Both were kept in small enclosures with no access to food or water visible during the visit.

Animal welfare concerns in case study 10:

- Puppies in small enclosures with no food or water.
- Severe anxiety and stress-related behaviour observed.
- Breeding conditions withheld from inspection.

Potential legal breaches:

- No microchip identification.
- No official EU pet passport.
- Possible unregistered breeding activity.

Case study 11: Repeated Pomeranian sales through Facebook groups

Platform: Facebook groups

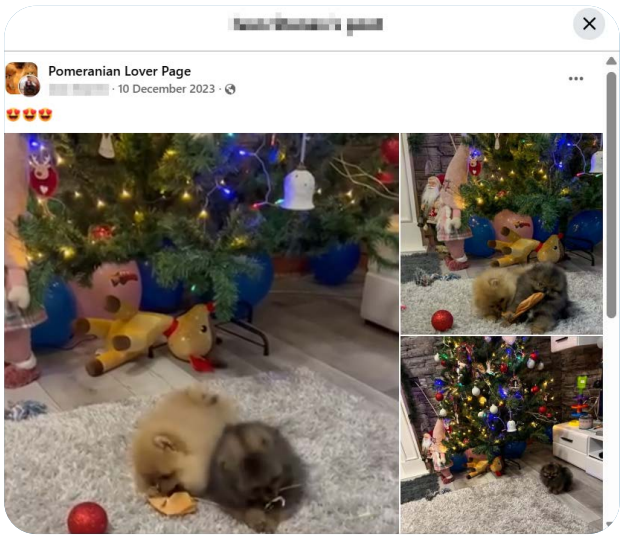

Figure 45: Screenshot of corresponding advert in Facebook group.

Figure 46: Screenshot of advert of different breed in different Facebook group by the same seller.

Investigators visited a seller who regularly advertised Pomeranian puppies across multiple Facebook groups (Figure 45, Figure 46). The seller appeared to maintain a continuous supply of puppies for sale, suggesting a commercial breeding operation rather than occasional private sales.

Figure 47: Puppies for sale kept in small enclosures without access to food or water and potential injury risk.

None of the puppies offered had microchips or official passports, and the seller was not found on the breeder registry.

"The seller appeared to maintain a continuous supply of Pomeranian puppies." – Investigator

Animal welfare concerns in case study 11:

- Evidence of continuous commercial breeding operation.

Potential legal breaches:

- No microchip identification.
- No official EU pet passport.
- Possible unregistered breeding activity.

Conclusion

This investigation documents a stark gap between how puppies are presented on Facebook and the conditions in which they are bred and sold. Across eleven sellers contacted through ordinary Facebook posts, investigators found practices that raise serious concerns regarding animal welfare, consumer protection and compliance with Bulgarian law. In every case, those posts were placed in open disregard of Meta's own policies governing the sale of animals on its platforms, policies that sellers appear to know about and know carry no meaningful consequences.

The investigation was not designed to seek out extreme cases. Investigators responded to routine posts in widely used Facebook groups, the same listings that prospective buyers encounter daily. Yet across different regions and unconnected sellers, the same patterns emerged: puppies offered below the legal minimum sale age, animals showing signs of illness or distress, absent or incomplete documentation, and breeders operating without registration or oversight.

The conditions documented behind these posts bore little resemblance to what the online listings presented. Puppies were found in unsanitary environments, separated prematurely from their mothers and in several cases showing visible signs of ill health. Breeding dogs, whose welfare rarely conformation in any online listing, were observed in poor living conditions, some with untreated injuries or chronic health problems resulting from extreme selective breeding practices.

The investigation also identified a series of deliberate practices employed by sellers to limit transparency and avoid accountability. Handovers were arranged in car parks and public laybys rather than at breeding premises, preventing buyers from assessing the conditions in which animals had been raised. Sellers in several cases advised buyers that microchipping and passports could be completed after purchase and registered in the buyer's name, a practice that is both misleading and inconsistent with Bulgarian legal requirements, under which these obligations rest with the seller. Some sellers also omitted prices from their Facebook advertisements, a recognised technique for evading automated detection on Meta's platform.

These cruel and illegal practices were not incidental within the investigated sample. They represent a pattern of behaviour that could not withstand scrutiny, and they persist because Meta's platforms allow sellers to reach large audiences with minimal oversight and no meaningful accountability. Facebook is not a passive backdrop to this trade. It was the primary channel through which the investigated sellers advertise, communicate with buyers and arrange sales. This indicates that the identified cases likely reflect only a small fraction of the ongoing illegal puppy trade on Facebook.

The welfare concerns documented in this report extend beyond the puppies offered for sale. The breeding dogs used to sustain this trade rarely feature in any online listing and are seldom subject to inspection or oversight. Addressing the illegal puppy trade in any meaningful way requires this dimension of the problem to be acknowledged and acted upon.

FOUR PAWS calls on Meta to act on these findings without delay. Hence, the company must enforce its own policies, remove groups and profiles facilitating illegal animal sales immediately, and engage seriously with the findings and evidence presented in this report. Continued inaction is not a neutral position. Every day that these advertisements remain on Meta's platforms, more animals are bred, sold and transported in the conditions documented here.

Recommendations

Recommendations to Meta

Meta's existing policies prohibit the sale of animals by private individuals on Facebook and Instagram. Those policies are not being enforced. The findings of this investigation, and of the 2024 Social Media vs Reality report, make clear that enforcement failures are not a minor or peripheral issue: they are allowing and enabling illegal and cruel puppy trading to operate openly at scale on Meta's platforms.

FOUR PAWS calls on Meta to:

- Proactively identify and remove Facebook groups used to advertise and sell puppies by private individuals, in breach of existing platform policies.
- Ensure the removal of all groups and accounts that have already been reported and documented in multiple investigations, and prevent their re-emergence under new names or formats.
- Invest in improved automated detection systems capable of identifying high-risk animal sale content, including advertisements that deliberately omit prices or use coded language to evade moderation.
- Conduct regular audits of Facebook groups and Instagram profiles dedicated to dog breeding and pet sales, and remove those that facilitate illegal or irresponsible trading.
- Formally recognise animal trading as a systemic risk on its platforms and commit to meaningful and measurable improvements in enforcement.
- Engage proactively with animal welfare organisations and national authorities to develop more effective detection and removal mechanisms.

Recommendations to Bulgarian authorities

Illegal breeding practices include serious risks, both for consumers and the animals themselves. The lack of registration of breeding facilities raises concerns about the quality of veterinary care and the conditions under which animals are bred and kept, limiting the possibility of inspection and oversight. No compliance with the registration requirement and unregulated breeding are inevitably associated with tax evasion, particularly in regards to long-running commercial activities. This necessitates a throughout analysis of the situation and the adoption of decisive measures for prevention and effective control of illegal breeding activities, including the introduction of stricter sanctions in cases of identified violations by the competent authorities. Illegal breeding and selling of dogs is a multi-layered problem that requires effective coordination and cooperation in enforcement among the competent authorities.

Bulgaria has clear legal provisions governing breeder registration, animal identification, minimum sale age and the prohibition of cosmetic mutilations. Across eleven sellers investigated, those provisions were routinely and repeatedly ignored. Legislation that is not enforced offers no protection to animals or consumers.

FOUR PAWS calls on Bulgarian authorities to:

- Increase targeted inspections of residential and commercial properties suspected of operating unregistered breeding establishments.
- Stricter sanctions when unregulated selling and breeding of dogs is identified.
- Strengthen enforcement of microchipping and identification requirements, including penalties for sellers who transfer animals without documentation.
- Monitor online platforms, including Facebook, Instagram and other social media, for evidence of illegal breeding and sales activity.
- Strengthen cross-border cooperation with other EU member states to address the export of underage or undocumented puppies as identified in this investigation.
- Allocate additional resources and promote cross-sectoral cooperation between veterinary, police and trading standards authorities to address illegal puppy breeding and trading.

Recommendations to consumers

Prospective puppy buyers have a significant role to play in reducing demand for illegally bred animals. Understanding the tactics used by sellers on social media, and the legal requirements that any legitimate sale should meet, can help buyers avoid unknowingly supporting the illegal puppy trade.

When buying a puppy in Bulgaria, buyers should be aware that:

- The seller, not the buyer, is legally responsible for microchipping and issuing an official EU pet passport before the puppy is sold. Any seller who suggests the buyer arrange this after purchase is transferring a legal obligation that rests with the seller.
- Puppies cannot legally be sold before they are eight weeks old (56 days). Any seller offering younger puppies is breaking the law.
- All puppies must have completed age-appropriate vaccinations before sale.
- Sellers are legally required to be registered as breeders. Buyers should request evidence of registration before proceeding with any purchase.

When responding to puppy advertisements on social media, buyers should treat the following as red flags:

- No price listed in the advertisement, a common tactic used to avoid platform detection.
- The seller proposes meeting in a car park, petrol station or other public location rather than at the breeding premises.

- The seller claims that microchipping or a passport is only necessary if the buyer plans to travel abroad with the dog. This is incorrect.
- The seller is unwilling to show the mother of the litter or the conditions in which puppies have been kept.
- No official EU pet passport is provided at the point of sale.

FOUR PAWS strongly encourages prospective dog owners to adopt from a registered local shelter or rescue organisation wherever possible. If purchasing from a breeder, buyers should do so only from registered, licensed breeders who can provide full documentation and allow buyers to visit the well-maintained breeding premises.

Supplementary Material

The table below sets out the specific potential legal breaches identified for each seller investigated.

Seller	Key observations	Potential legal breaches
Case Report 1	Puppies kept in unsanitary apartment conditions; underage sale; no microchip	Breach of minimum sale age requirement; breach of identification requirement; potential breach of requirement to sell healthy animals
Case Report 2	Large, unregistered breeding facility with many dogs; puppies sold without documentation	Breach of breeder registration requirement; breach of identification requirement
Case Report 3	Large breeding facility; puppies offered without microchip or passport; export discussed	Breach of identification requirement; potential breach of breeder registration requirement; potential breaches of EU pet travel regulations
Case Report 4	Underage puppy sold in petrol station car park; no microchip or passport	Breach of minimum sale age requirement; breach of identification requirement; potential breach of breeder registration requirement
Case Report 5	Underage Chihuahua (47 days) showing signs of illness; no microchip	Breach of minimum sale age requirement; breach of identification requirement; potential breach of requirement to sell healthy animals
Case Report 6	Underage puppy offered for sale (50 days), no microchip, breeder confirmed unregistered	Breach of minimum sale age requirement (Ordinance No. 41, Art. 20); breach of microchip identification requirement (Veterinary Practice Act Art. 174); breach of breeder registration requirement (Animal Protection Act Art. 35)
Case Report 7	Puppies aged 37 days offered for sale; no microchip; ears cropped and tails docked	Breach of minimum sale age requirement; breach of identification requirement; illegal cosmetic procedures (Veterinary Practice Act Art. 177)

Case Report 8	Puppies aged 45 days; unregistered breeder; cropped ears and docked tails	Breach of minimum sale age requirement; breach of breeder registration requirement; illegal cosmetic procedures
Case Report 9	Puppies offered with cropped ears; documentation to be arranged after sale	Illegal cosmetic procedures; avoidance of identification and traceability requirements
Case Report 10	Puppies offered without microchip or passport; refusal to show breeding conditions	Breach of identification requirement; potential breach of breeder registration requirement
Case Report 11	Puppies offered without microchip or passport; breeder not found on registry	Breach of identification requirement; potential breach of breeder registration requirement

Suppl. Table 1: Potential legal breaches identified during the investigation

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Figure 2: French Bulldog puppies for sale in a dirty whelping box (dismantled furniture) containing faeces.

Figure 3: French Bulldog puppies in dirty whelping box. The two mainly white puppies appear to have eye malformations (strabismus and microphthalmos).

Figure 4: Close up of French Bulldog puppy with eye malformation.

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Figure 6: Close up of outdoor kennels housing the breeding dogs. Note the food leftovers and the dirty, rusty water bucket.

Figure 7: Close up of the female breeding dog with a deformed left front leg.

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Figure 12: Pomeranian breeding dogs in an outdoor kennel. The dog on the left shows eye discharge, and the dog on the right presents with severe alopecia.

Figure 13: Whelping box of another litter. Note the severe eye discharge and tear staining of the mother in the front and poor bedding and contaminated food of the puppies behind.

Figure 14: Screenshot of corresponding advert in Facebook group.

Figure 15: Extensive outdoor kennelling in a breeding facility.

Figure 16: French Bulldog puppies for sale with extreme conformation.

Figure 17: Close-up of a puppy (11w) for sale with extreme conformation (extreme nasal fold, so called "rope" and narrow nostrils) and submissive behaviour.

Figure 18: Breeding dog in front with left-sided head tilt indicating a chronic ear infection.

Figure 19: Close-up of breeding dog with extreme conformation, showing chronic ocular discharge.

Figure 20: Close-up of breeding dog with severely narrow nostrils.

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Figure 22: Close-up of Pomeranian puppy for sale. Note the submissive behaviour and extensive tear staining.

Figure 23: Screenshot of corresponding advert in Facebook group.

Figure 24: Chihuahua puppy for sale. Note the eye discharge and stressed/anxious posture.

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Figure 26: Screenshots of corresponding advert on Instagram.

Figure 27: Pomeranian puppy offered for sale. Showed signs of severe stress (yawning, licking, panting, trembling).

Figure 28: Breeding adult male, missing one eye after a dog fight.

Figure 29: Ungroomed adult dog with tear staining and matted fur.

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Figure 36: Close-up of a kennel with dirty water bucket of an adult breeding dog. Note the cropped ears of the dog.

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Figure 38: Recommended 'transportation company' for cross-border dog sales across Europe.

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Figure 41: Breeding dog with extreme conformation conformation.

Figure 42: The dog in the foreground showed a visible eyelid tumour.

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Figure 44: Puppies (left dog 10 weeks, right dog 4.5 months old) for sale kept in small enclosures without access to food or water and potential injury risk.

Figure 45: Screenshot of corresponding advert in Facebook group.

Figure 46: Screenshot of advert of different breed in different Facebook group by the same seller.

Figure 47: Puppies for sale kept in small enclosures without access to food or water and potential injury risk.

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1 FOUR PAWS. 2024. Social media vs reality: how Meta is failing to curb cruel puppy trade on Facebook and Instagram (Webpage). Vienna (AT): FOUR PAWS; visited 2026 Apr 15. Available from: https://media.4-paws.org/7/2/3/1/723103ad-a773ccdb9d70037d0641f07bf3740718/Social-Media-vs-Reality_FOUR%20PAWS_Report.pdf

2 FOUR PAWS. 2023. Savanta research report: public attitudes towards online puppy trade and social media platforms (Webpage). Vienna (AT): FOUR PAWS; visited 2026 Apr 15. Available from: https://media.4-paws.org/e/b/7/d/eb7d7f63f8b-67f1a6defe48b31c926a9a2ddecf7/FOURPAWS_Savanta_Research_Report_V5_Web_SinglePages.pdf

3 The Animal Protection Act, in force as of 31 January 2008, last amended 29 July 2025. available via Lex.bg: https://lex.bg

4 The Veterinary Practice Act, in force as of 2 May 2006, last amended 10 May 2024. available via Lex.bg: https://lex.bg

5 Ordinance No. 41 of 10 December 2008 on the requirements for establishments where pets are kept, bred and/or offered for trade purposes, for boarding houses and animal shelters, in force as of 1 July 2009, last amended 27 May 2016. available via Lex.bg: https://lex.bg

FOUR PAWS' Illegal Puppy Trade Campaign

FOUR PAWS' goal is to transform the online pet trade into a transparent and accountable one, by making the people who sell puppies online traceable, and therefore accountable for their businesses. FOUR PAWS has worked with key industry stakeholders to develop the software interface VeriPet which helps to verify whether a puppy has been microchipped and registered to an identity-verified seller on classified ad sites.

For more information on the requirements for an efficient online trade regulation please read the Model Solution Report which you can find under this link. (https://www.four-paws.org/campaigns-topics/topics/companion-animals/tracing-the-trade)

About the Cute. Quick. Sick. campaign

In 2022 FOUR PAWS launched an international public awareness campaign aimed at potential puppy buyers to raise awareness of the risks of buying a puppy from the illegal and unscrupulous puppy trade. This campaign seeks to reach potential puppy buyers before they buy a puppy online, to show them the risks associated with buying online, and provide them with the information and resources they need to buy a puppy responsibly.

You can find more about the campaign and how to acquire a puppy responsibly here: four-paws.org/buying-a-puppy

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Research/investigations of UK, Germany, Austria, Switzerland and France ads were conducted by TRACKS Investigations on behalf of FOUR PAWS in 2023 and 2024.

The report was drafted by Carly Halliday based on investigation reports and findings.

Disclaimer

The analysis in this report tackling the unregulated puppy trade on Facebook and Instagram is based on desktop research, and online and telephone conversations with dealers in several countries in Europe.

About FOUR PAWS

FOUR PAWS is the global animal welfare organisation for animals under direct human influence, which reveals suffering, rescues animals in need and protects them. Founded in 1988 in Vienna by Heli Dungler, the organisation advocates for a world where humans treat animals with respect, empathy and understanding. FOUR PAWS' sus¬tainable campaigns and projects focus on companion animals including stray dogs and cats, farm animals and wild animals – such as bears, big cats and orangutans – kept in inappropriate conditions as well as in disaster and con¬flict zones. With offices in Australia, Austria, Belgium, Bulgaria, Germany, France, the Netherlands, Switzerland, South Africa, Thailand, the UK, the USA, and Vietnam as well as sanctuaries for rescued animals, FOUR PAWS provides rapid help and long-term solutions to address animal welfare issues.

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