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The Model Solution in the Netherlands

Foreword

FOUR PAWS has together with leading experts described in the “[Model Solution Report](#)” a system to regulate the online trade of dogs and other companion animals. The regulation is based on a verification of the dog’s registration to the advertiser, before an advertisement can go live. This system has already been implemented in two countries, in Ireland, and Switzerland, and is today better known as “VeriPet”.

While all requirements for this system are described in the Model Solution Report, this document explores specifically the situation in the Netherlands and provides country-specific recommendations for the implementation of a registration verification system for the online trade in companion animals, which can be microchipped.

This analysis was written in parallel and independent of the proposed [REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the welfare of dogs and cats and their traceability](#). FOUR PAWS recommends - in case the EU regulation leaves loopholes for illegal puppy dealers - to adopt stricter measures at a national level, ensuring traceability of the animals and to efficiently block illegal puppy dealers from entering the online market.

Situation Analysis and Recommendations to implement full traceability and a regulation of the online trade of dogs (and cats) in the Netherlands

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Current situation in the Netherlands (February 2025)

1. Illegal puppy trade in the Netherlands

The Netherlands, particularly the province of Brabant, is thought to be a substantial Western-European hub for the illegal puppy trade. Media reports of dubious dealers, corrupt vets and aggrieved consumers are numerous. However, convictions for illegal puppy trading are rare, especially on the grounds of animal welfare, and those involved are more likely to be prosecuted for business fraud or tax evasion than for cruelty towards animals.

Many animals imported from puppy farms abroad are advertised via online classified ad sites such as Marktplaats.nl, Puppyplaats.nl, Tweedehands.net, Marktnet.nl and a range of other online marketplaces.

2. The online trade situation

It is still possible on some classified ad sites in the Netherlands to open a new sales account by simply providing an email address. This means, animals can be advertised anonymously. Should a user account get blocked, the user can simply open a new account. It is also common, that users from other countries can advertise on Dutch classified ad sites.

Especially the larger classified ad sites have made stronger regulations for advertisements of dogs in recent years. For example, Marktplaats, a classifieds leader in the Dutch market, has implemented mandatory SMS verification when creating a sales account, voluntary identity verification via one's bank account, and voluntary identity checks. In addition, Marktplaats has implemented a mandatory payment for dog advertisements in 2019, following the paywall examples of Gumtree in the UK and Kijiji in Canada.



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Nevertheless, all these measures seem not to have deterred suspicious traders from advertising potentially illegally imported, unchipped puppies.¹

For the consumers on Marktplaats it is difficult to assess the legitimacy of an advertisement. They won't see the advertiser's real name, as usually nick names are used. A Marktplaats dog advert currently displays the advert number, voluntary data such as the telephone number of the advertiser, whether the sales account is of a private individual or a business seller, or whether the seller has not indicated this yet. Additionally, within the advertisement the 'type of provider' such as 'Private', 'Breeder/Hobby', 'Breeder/Professional' or 'Trader' is shown, the origin of the dog, age, sex, vaccination record and whether they have been chipped, registered, et cetera. But all this data is provided by the seller and is usually unverified by Marktplaats. Marktplaats asks business sellers to indicate the Unique Business Number [UBN]² in the free text of the advertisement, but does not verify the number, or even monitor if the number is included in the text.

There are currently no Dutch or EU laws that provide clear provisions for the sale of dogs on online marketplaces that effectively help regulate the online trade. In general, if one online marketplace becomes 'too difficult' to use, unscrupulous dealers can easily move to another classified ad site.

Fact is, that sellers can still sell animals on classified ad sites in the Netherlands which are not microchipped and registered, thus untraceable, and potentially illegally imported. Media reports³ and FOUR PAWS research⁵ proof these activities are taking place.

3. Puppy trading prosecutions and enforcement capacities

There are 3 parties involved in enforcing animal welfare, working together based on agreements in a covenant: the Dutch Food and Consumer Product Safety Authority (Nederlandse Voedsel- en Warenautoriteit, NVWA), the National Animal Welfare Inspection Service (Landelijke Inspectiedienst Dierenwelzijn, LID) and the police. The tasks are divided. The control authority NVWA supervises animal welfare and veterinary regulations in the field of animal trade itself and is dedicated to the commercial breeders. The LID supervises the welfare rules for non-business dog breeders and commercial pet keepers (pet shops and shelters) and reports of neglect. And the police act upon animal abuse, cruelty and urgent matters where immediate action is needed. The police therefore apply the criminal law enforcement, the other two parties can apply both criminal and administrative law enforcement. Except the animal police, the RVO, the NVWA and the LID have full access to the data in the central Identification & Registration (I&R) database for dogs.⁶

Because sub-optimal animal welfare practices are difficult to prove with the enforcement capacity at the time, there were few legal cases against perpetrators for dog trade related animal abuse, neglect or illegal trade, and the problem is under-reported in the year overviews of authorities. It may appear that the illegal

¹ <https://www.four-paws.org/our-stories/press-releases/november-2023/puppy-scammers-exposed>

² <https://business.gov.nl/regulation/registering-dogs-and-pet-passports/#art:register-your-company>

³ <https://newsbeezer.com/netherlandseng/illegal-puppy-trade-man-26-from-best-arrested/>,

<https://www.rtlnieuws.nl/nieuws/nederland/artikel/5207233/corona-puppys-vaak-ziek-illegale-hondenfokkers-hondenhandelaren>

⁴ <https://www.rtl.nl/nieuws/artikel/5421496/dierenorganisatie-four-paws-veel-illegale-advertenties-puppys>

⁵ <https://www.four-paws.org/our-stories/press-releases/november-2023/puppy-scammers-exposed>

⁶ See paragraph 6.3 Toezicht en handhaving, Stb 2021-426 <https://zoek.officielebekendmakingen.nl/stb-2021-426.html>



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trade of dogs in the Netherlands is not a big problem as convictions for illegal puppy trading tends to be based on risk for rabies, tax evasion, (passport) fraud and bad financial management related to the business rather than animal cruelty. Enforcement capacity for overseeing the dog trade was determined based on the seriousness of the reports received. However, in the past, these resources were insufficient to consistently and effectively monitor the (online) dog trade, compliance with microchipping regulations, and other legal issues such as veterinary misconduct.

The Dutch Food and Consumer Product Safety Authority (NVWA) has indicated in 2020 that they will double the number of inspectors that are occupied with the supervision on dog trade from 5 to 10 FTE for the whole country. From 2022 the NVWA has 6 teams working on animal welfare, one of those teams (with 13 persons staff) is working on companion animals, the others work on farm animals.⁷

Animal welfare and animal health inspections are carried out by the NVWA in response to a report or enforcement request.⁸ In 2021 from the 165 inspections at sellers and traders of dogs, 129 of the inspected cases (78 %) were non-compliant with the law.⁹ When dogs were imported from abroad, the violations were mostly because of invalid rabies vaccinations or health certificates.¹⁰ Nothing is mentioned about inspections on the microchip obligation. In the NVWA's annual supervisory report of 2022 about companion animals, you can see the priority has been on rabies vaccination (public health) and not on animal welfare. Most of the inspections were done because of notifications by vets. Only 29 inspections (in the field of companion animals) were regarding animal welfare. Violations were on chipping, vaccination and health certificates together; it has not been made visible in detail in this year's overview; an annual report is not available.¹¹

4. The legal situation in the Netherlands

In the Netherlands, a person is considered a commercial keeper of animals if the activities are carried out at a certain scale and with a certain regularity. Although not a legal requirement, the general rule (also used for enforcement) is that people selling, delivering, keeping or breeding up to 20 dogs or cats per year are private actors. Other indicators are assessed in case of doubt, to determine whether someone is a commercial keeper, such as whether someone is selling dogs/cats commercially, advertises, has a VAT number, and whether someone has space specifically furnished for rearing dogs/cats.¹²

If a person is deemed a 'commercial keeper' of animals, they need to register their location with the authority governing registration of (agricultural) businesses (RVO), before starting the activities or within three working days of keeping the animals. When registering as a commercial keeper, applicants need to verify their identity by providing their Chamber of Commerce number and using their DigiD (a username and password coupled to your civilian number and personal details, used generally by everyone in the

⁷ Not all of them are inspectors, some are knowledge-specialist or develop enforcement policy. Source NVWA.

⁸ <https://www.nvwa.nl/over-de-nvwa/nieuws/2022/10/27/nvwa-verdiep-je-als-consument-vooraf-bij-aanschaf-van-een-pup>

⁹ <https://www.nvwa.nl/over-de-nvwa/documenten/dier/dierenwelzijn/welzijn/inspectieresultaten/inspectieresultaten-dierenwelzijn-en-diergezondheid-huisdieren>

¹⁰ <https://www.nvwa.nl/over-de-nvwa/documenten/dier/dierenwelzijn/welzijn/inspectieresultaten/inspectieresultaten-dierenwelzijn-en-diergezondheid-huisdieren>

¹¹ <https://www.nvwa.nl/onderwerpen/dierenwelzijn/inspectieresultaten/inspectieresultaten-2022/inspectieresultaten-dierenwelzijn-gezelschapsdieren-2022>

¹² <https://www.rvo.nl/onderwerpen/dieren-houden-verkopen-verzorgen/bedrijfsmatig-huisdieren-houden/veelgestelde-vragen>



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Netherlands for online government services, in order to identify yourself). After registration, the commercial keeper immediately gets a UBN.

In addition to registering, the commercial keeper also needs to provide 'proof of professional skills' (*Bewijs van vakbekwaamheid*) of the administrator/manager of the business. This is a certificate/diploma from a recognized educational institute for the keeping of the concerned animals.

In spring 2021, a decision was made on improving the identification and registration of dogs.¹³ These rules have been implemented on November 1st, 2021.¹⁴

This new law^{15 16} will require private persons to register to the RVO when they have a litter, but also anyone who brings a dog to the Netherlands for the first time, or who has obtained a dog that is not equipped with an injectable transponder, or which has not been registered yet. They will need a Unique Business Number. If a commercial breeder or importer has already a Unique Business Number, as was previously mandatory for this group, they can use this one. This UBN numbers¹⁷ are required to register the dogs, which is mandatory.

For an outsider it is not visible whether the UBN belongs to a private keeper or to a commercial keeper.

Evaluation is needed to assess if sufficient checks are conducted whether breeders deal more than 20 dogs per year and should be subject to rigorous enforcement.

In the current situation the selling of dogs by another person (like a family member) is possible with another UBN number, for the same location, if the former breeder is convicted. The UBN number can also be ended by the RVO. But it is also possible the UBN number is transferred to someone else if the former one was convicted. This makes it difficult to enforce illegal trade on a location, as it can easily be continued.

Additional legal measures have been approved that can be taken when people keeping animals infringe the Law on Animals¹⁸ and the associated subordinate regulations.¹⁹ These legal measures are collected in the Animal Abuse and Neglect Act.²⁰ Not only can they be punished for activities harming the health of humans and animals, but also for activities which affect animal welfare. Furthermore, a 'keeping ban of animals' of 30 years or even for a lifetime can be given as a penalty since this new legislation has come into effect on January 1st, 2024.^{21 22} This opens options for policing the dog trade more vigilantly and making sure recurrent unscrupulous dealers are no longer allowed to keep dogs.

¹³ <https://www.rvo.nl/onderwerpen/identificatie-en-registratie-dieren/honden> , and <https://www.rijksoverheid.nl/documenten/besluiten/2021/01/22/besluit-over-verbeteren-identificatie-en-registratie-van-honden>

¹⁴ <https://zoek.officielebekendmakingen.nl/stb-2021-477.html>

¹⁵ <https://wetten.overheid.nl/BWBR0035217/2024-07-01>

¹⁶ <https://www.rvo.nl/onderwerpen/identificatie-en-registratie-dieren/honden/ubn-niet-bedrijfsmatig-honden>

¹⁷ UBN referring now in this report to both private and commercial stakeholders

¹⁸ [wetten.nl - Regeling - Wet dieren - BWBR0030250 \(overheid.nl\)](https://wetten.nl/Regeling-Wet-dieren-BWBR0030250)

¹⁹ <https://wetten.overheid.nl/BWBR0035217/2018-07-01/>

²⁰ Wet aanpak dierenmishandeling en dierverwaarlozing: <https://zoek.officielebekendmakingen.nl/stb-2023-242.html>

²¹ https://www.eerstekamer.nl/wetsvoorstel/35892_wet_aanpak

²² <https://zoek.officielebekendmakingen.nl/stb-2023-242.html>



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In July 2023 the minister of Agriculture has promised the parliament to introduce the chipping requirement for cats also.²³ The first steps to build this system were scheduled for spring 2024. The secretary of state has indicated to aim for implementation of the microchip obligation in 2026.

FOUR PAWS appreciates the efforts being made to make the trade of dogs more transparent and refers to it as “the new law” below, which hopefully might undergo further improvement.

5. The execution of I&R

5.1. Chipping dogs

Dogs born in the Netherlands after 1 April 2013 need to be chipped within seven weeks of birth and be registered via one of the 8 recognized database portals into the central RVO dog database²⁴ within eight weeks of birth. The first keeper of the animal, which is the breeder, needs to make sure the animal is chipped and registered after birth (on the breeder’s name). All dogs, regardless of their age, which are being imported both privately and commercially, must be registered, by a vet or ‘officially registered chipper’, via a Dutch database portal within two weeks of entering the country, and must be registered to the person who imported the dogs. Every Dutch dog must be microchipped with an ISO 11784 or 11785 conforming transponder²⁵ with the 528 Dutch country code, but it is possible to bring a dog into the country legally with another type of microchip.

EU regulation states that dogs must be chipped in the country they have come from, before entering the Netherlands or another member state. Unfortunately, it does not state that the dogs also must be registered in the country from which they originate.

Microchips can be administered by vets, but also by “officially registered chippers”, these are people chipping dogs as an economic activity. Pedigree dog associations have their own ‘chippers’, but there are also other ‘commercial chippers’.

All veterinarians and chippers need to be registered with the RVO, in order to receive injectable transponders (“microchips”), which may only be delivered to their registered business address.

The manufacturers of microchips and pet passports need to be approved by the ministry and they are required to maintain digital bookkeeping records, which must be submitted to the RVO. These records should detail to which registered chippers and vets they have sold the 528 Dutch country code transponders, and to which vets they have provided specific passport numbers. Chippers also need to report if they passed transponders on to another chipper. Costs of chipping vary between vets and chippers. Pet passports can only be issued by veterinarians according to European law. Veterinarians can also pass on passports to other vets but need to report it.

²³ <https://zoek.officielebekendmakingen.nl/kst-28286-1303.html>

²⁴ After entry of the new law, the 8 dog databases are since called « portals », and deliver the data to the new central database by the RVO.

²⁵ Regulation EU 576/2013 of 12 June 2013, for non commercial trade of pets. Appendix II <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:178:0001:0026:en:PDF>



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With the new law, any keeper who gets a litter, imports a dog or acquires a dog without registration or microchip, must register as a natural person with the RVO and get a UBN. This UBN is a prerequisite to get the dog chipped and registered. The ministry's objective was to ensure that all breeders and importers (including private breeders and importers) register with the RVO, to ensure the first part of the "chain" will be fully visible, which is expected to reduce the illegal puppy trade.

With the new legislation, both chippers and vets can chip and register the dogs to a pet registration portal, but only if the keeper has a UBN number. When a dog is imported or when a keeper obtains a dog without a chip and / or registration, only a veterinarian may do the full registration. What is not properly arranged is a obligatory watertight identity check of the holder of the UBN number by the veterinarian. The vet is not able to see the identity data of the UBN-owner.

With the new law it also became mandatory, that every dog has an EU pet passport, no matter if the dog ever crosses a border.

A mandatory registration as a breeder or importer from the first animal given away onwards is a main demand in FOUR PAWS Model Solution to close a loophole for frauds who lie about having only one litter, when actually selling on a commercial scale. It is left to see whether the new law and the new obligatory UBN for the mandatory dog registration will serve the authorities in better identifying puppy dealers which not yet officially operate as commercially keeping dogs but sell more than 20 dogs per year unofficially.

5.2. Registration of chipped dogs

Registration of animals is possible in one of the 8 portals and data is collected in the central database managed by RVO. The direct registration from keepers, registered chippers and vets about I&R dog goes through the portals. To view personal data of breeders, importers and chippers the RVO central I&R database, can only be consulted by certain enforcers.²⁶

The following portals are currently assigned by the government²⁷ for the registration of chipped dogs in the national database of the RVO:

[BackHomeclub.nl](#) – Virbac Nederland B.V.

[Chipbase](#)

[Databank Honden](#) – Raad van Beheer

[Hondregistreren.nl](#) – Vereniging van Beroepsmatige Kennelhouders

[Huisdier-registratie.nl](#)

[PetBase](#) – Micpoint B.V. (Europetnet member)

[Petlook](#)

[Stichting Nederlandse Databank Gezelschapsdieren](#) (NDG) (Europetnet member)

Using an online tool, the registration of the animal in a pet database portal must be carried out by the vet or commercial chipper who inserted the chip – all this is defined by the new law. A form needs to be filled in with personal details and can be submitted online. Before the new law came into force, first keepers

²⁶ <https://www.rvo.nl/onderwerpen/identificatie-en-registratie-dieren/honden/dierenartsen>

²⁷ [Portalen voor registratie van honden \(rvo.nl\)](#)



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could register their own data themselves, which left room for fraud. Chippers and vets need to be provided with a UBN number by the person who keeps the dogs, and they can ask for an ID from the dog owner – but the law does not state that this is obligatory. With the new law the chip number must be linked to the UBN number of the keeper, and the chipper or veterinarian will mention their own registration number, so that it is clear who injected the chip.²⁸ Also, the mandatory passport's number of the dog will be coupled to the microchip data entered, by a veterinarian, who needs to give his own veterinary registration number in this operation as well. In the new law it is stated that before the vet issues the dog's identification document, the keeper of the dog identifies himself with the UBN number.²⁹

Even though there is mandatory registration of dogs in the Netherlands, only with the new law, the data in the databases becomes more reliable. Unfortunately, the strict checks of the keepers only apply to the persons who are registered as the first keepers, but not for any secondary keepers, whose data is not verified by a chipper or veterinarian. These persons can fill in their own data into the pet registries, which means that there is a loophole for fake data, and therefore, unreliable data.

The data of their dogs in the portals can be accessed by the keepers with a username and password. Name and some other characteristics of the dog and details of the person who has the dog registered to their name (keeper) can be changed, but the species, transponder number, date of birth and country of origin cannot be changed in most databases. Legislation for the portals³⁰ specifies what the portals need to provide for.

The new law says that in addition to data about the animal itself, data also has to be recorded about the successive owners (keepers)³¹ such as the breeder, the importer or the shelter. This provides a legal basis for processing personal data. Which data will be processed is also laid down in this legislation.³² It will also be determined how long the data may be stored and it is recorded who is the controller and what the purpose of the processing of the data is.

What seems to not have changed with the new law is that one chip number can be registered in multiple portals. The keeper of the dog can determine which portal they wish to use.

With the new law, data will be directly forwarded from the portals to the national RVO I&R database, where it is stored.

In the past, anyone could register any dog and link it to anyone, which happened for example when divorcees re-registered the dog to themselves. With the new law, the former owner needs to submit a disposal report to a portal. Unfortunately, the new owner does not need a UBN and registers the dog with a portal.³³ Thus, ownership change management is obligatory but next owners can do this without a UBN number to be registered. Besides that, it is technically possible a dog can be registered by a new owner, if

²⁸ https://wetten.overheid.nl/BWBR0035248/2023-07-01#Hoofdstuk5b_Afdeling5b.4a_Paragraaf5b.4a.1_Artikel5b.68a_lid_2_onder_d.

²⁹ https://wetten.overheid.nl/BWBR0035248/2023-07-01#Hoofdstuk5b_Afdeling5b.5_Paragraaf5b.5.6_Artikel5b.73a

³⁰ https://wetten.overheid.nl/BWBR0035217/2023-10-07#Hoofdstuk3_Paragraaf4_Artikel3.32

³¹ https://wetten.overheid.nl/BWBR0035248/2023-07-01#Hoofdstuk5b_Afdeling5b.4a_Paragraaf5b.4a.1_Artikel5b.68a_lid_3_en_4.

³² https://wetten.overheid.nl/BWBR0035248/2023-07-01#Hoofdstuk5b_Afdeling5b.4a_Paragraaf5b.4a.1_Artikel5b.68b

³³ <https://www.rvo.nl/onderwerpen/identificatie-en-registratie-dieren/honden/houders-van-honden#krijgt-uw-hond-een-nieuwe-houder%3F-meld-de-hond-af>



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the disposal report of the previous owner was not done, which means anyone could register a dog if he knows the (or any) dog's microchip number. So, in the central database two keepers can be registered with the same chip number, which is not visible to the public.

According to the explanatory memorandum with the new law, veterinarians should be able to report suspicious cases and make notes about this in the recorded I&R data, e.g. suspected false vaccinations and suspicious date of birth,³⁴ which is also a demand within FOUR PAWS' Model Solution to provide a better overview who might be involved in suspicious activities. Unfortunately, in the portals this is still not possible. This means that in practice the veterinarians must make an official report to the supervisory authority NWWA, which is a very time-consuming and de-motivating process because they never receive feedback about this reporting. As a result, the amount of reports decreases, which gives the impression of a decrease in fraud cases in The Netherlands, however, this is not the case in practice.

With the new law, breeders may not do the first registration of the puppies themselves anymore, they only announce the date of birth of the registered puppies and the chip number of the mother animal to the renewed I&R system. The breeders still are responsible for having their puppies microchipped by a veterinarian or registered chipper, where it is new that the vet or chipper does initial registration. Breeders need to ensure as well that each puppy has a passport.

Additionally, the breeders need to record the pups' date of birth and add the microchip number of the mother to the pup's registration.³⁵ According to the new rules the owner of the dog has to identify himself to the veterinarian with his UBN number (not his citizen service number), which means only the name and address is visible, but the owner does not have to show any ID card or passport confirming the identity of the owner³⁶. So this identity check, in practice it is not so strict, because the veterinarian is not an investigating officer and he is not required to check the identity of his clients. This lack of identity control is a weak spot in the link of the I&R chain.³⁷

5.3. The I&R enforcement parties

Several public and private parties are involved in the implementation of the I&R of dogs. These parties are the Netherlands Enterprise Agency (RVO) as executive governmental organization, the Dutch Food and Consumer Product Safety Authority (NVWA) as governmental enforcer, the National Animal Welfare Inspection Service (LID) as private enforcement service, the police and the designated portals.

³⁴ Wijziging besluit houders van dieren, Stb 2021-426, paragraaf 8.1 page 25. And paragraaf 5.5 Dierenartsen en andere diergeneeskundigen

³⁵ Stb 2021-426. Besluit van 27 augustus 2021, tot wijziging van het Besluit houders van dieren en het Besluit diergeneeskundigen in verband met het verbeteren van de identificatie en registratie van honden en het registreren van chippers, paragraaf 5.6 Beroepsmatige fokkers en particulieren met een nestje, <https://zoek.officielebekendmakingen.nl/stb-2021-426.html>

³⁶ https://wetten.overheid.nl/BWBR0035238/2023-09-01#Hoofdstuk7_Artikel7.7 : 'Voordat een injecteerbare transponder bij een hond wordt aangebracht, identificeert de houder van de hond zich bij aanbrengrer van de injecteerbare transponder met het registratienummer van de houder.'

³⁷ Stb 2021-426. Explanatory memorandum. See paragraph 8.1 Internetconsultatie (Advies en consultatie). Identificatieplicht, page 26 <https://zoek.officielebekendmakingen.nl/stb-2021-426.html> ; 'Identificatieplicht In een anonieme reactie wordt opgemerkt hoe de dierenarts kan weten of het registratienummer dat de houder opgeeft wel van de houder is. Als reactie hierop wordt gesteld dat de houder bij de registratie bij RVO een registratiebewijs (pdf) krijgt, waarop naast het nummer ook NAW-gegevens staan. De dierenarts mag ook naar een identificatiebewijs vragen.'



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5.4. The RVO

The registration of breeders, importers, buyers of dogs without a chip or registration as well as the registration of the commercial chippers takes place directly with the Ministry, through the RVO. The RVO uses the data of veterinarians in the Veterinary Medicine Register, which is managed by the Centraal Informatiepunt Beroepen Gezondheidszorg (CIBG)³⁸, thus veterinarians do not need to register again with RVO.

The RVO oversees the comprehensive central I&R database, which includes registrations of dogs, keepers, initial keepers (breeders), importers, buyers of dogs with unknown origins, and commercial chippers. Acting on behalf of the Ministry, the RVO is responsible for approving chip and passport suppliers. Additionally, the RVO issues chip and passport numbers under the authority of the Minister.

5.5. Passport

A pet passport can only be issued by a veterinarian³⁹ and must indicate the microchip number, date, as well as other descriptive animal data. In addition, it also contains information about the person who applied for the passport (not the 'official owner', see below), the veterinarian, as well as vaccinations. With the new Dutch law, each dog must have an EU pet passport.

When issuing a passport, the vet registers the passport number within the registration data of the dog, indicating also the vet's registration number. Unused (blank) passports may be transferred between veterinarians. Just like the transponders, the transfer of a passport is digitally tracked in the I&R system for dogs.⁴⁰

A supplier of blank identification documents (dog passports) must have a recognition of the Minister and must keep a digital administration in which is included to whom which passports have been delivered. The writing off the passport numbers of the stock is done via an internet application or via a web service of RVO. For this an electronic identification means is required.⁴¹

5.6. Ownership

Having a dog registered into a database in your name, or having a dog's Pet Passport, does not legally prove ownership. Having a chipped dog registered under your name in one of the databases does not count as 'proof' that you own the animal, nor does the possession of the Pet Passport count as proof. Dog owners need to register the possession of a dog with their municipality (only if the specific municipality requires dog tax).

³⁸ <https://www.diergeneeskunderegister.nl/>

³⁹ Artikel 5b.73a lid 3. Identificatiedocument hond. Before the vet gives identity documents of the dog to the owner, the owner has to identify himself to the vet with his UBN number, and page 12 Stb 2021-426

⁴⁰ Par 5.5 Dierenartsen en andere diergeneeskundigen, Stb 2021-426

⁴¹ Par 5.1 Leveranciers van hondenpaspoorten, Stb 2021-426



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5.7. Transfer of dogs and buyers

When purchasing a dog, the buyer must receive an official EU animal-passport from the person selling the animal (new law), and the dog must be chipped and registered already.

When transferring the dog to a new owner, the first owner must deregister the dog, as was the case in the old system. The new keeper must then register the dog in his/her name in one of the pet databases. The second keeper does not need to have a RVO registration/UBN number.^{42 43} The problem is that theft of a dog is still possible; a second keeper can unsuspectingly buy a stolen dog and register the dog in his name when he uses another portal than the portal in which the dog is already registered. In the RVO database two keepers will be registered on the same chip number. However, other parties than enforcers are not able to see to this data.

6. The Netherlands and EU Activities

The Netherlands is one of the EU Member States with a joint declaration⁴⁴ (Belgium, Denmark, Germany, the Netherlands and Sweden), calling on the European Commission for action to stop the illegal trade in pet animals across the EU – particularly with regard to the smuggling of dogs across Member States. The declaration, amongst others, proposes a more compatible I&R system across EU member states for dogs, and improved enforcement and cooperation. A dedicated sub-group on the health and welfare of pets (dogs) in trade has been set up under the EU Animal Welfare Platform, chaired by the Netherlands. The subgroup published guidelines to regulate online trade. The guidelines include recommendations for the publication of both microchip number and breeder registration number on online platforms, and state that "Online platforms should as far as possible validate the information a seller provides to advertise online, especially in regard to the identity of the seller and the identity of the animal. Both can be checked through ID verification and back-end checks against the pet registration database, provided that the latter holds reliable data"⁴⁵. However, the EU needs to further build on the work of the subgroup and put forward strong measures to regulate the online trade and address the lucrative, illegitimate international puppy trade.⁴⁶

What gaps need to be bridged to reach full traceability in the Netherlands?

FOUR PAWS is optimistic about the changes stemming from the new law, which already covers many of our suggestions to end the illegal puppy trade. Nevertheless, there are still some open points which would need to be tackled to fully implement the Model Solution and VeriPet.

⁴² Zie Besluit 27 augustus 2021, par 2.5 pag 10 'De nieuwe houder moet de hond op zijn/haar naam aanmelden in een door Onze Minister aangewezen databank. Daarvoor hoeft de tweede houder niet over een houdernummer te beschikken.'
<https://zoek.officielebekendmakingen.nl/stb-2021-426.html>

⁴³ Regulation Houders van dieren, artikel 5b.68a lid 4, Registraties door de houder van een hond. En zie Besluit I&R NvT, page 10, Stb 2021-426.

⁴⁴ <https://ec.europa.eu/newsroom/sante/items/778585/en>

⁴⁵ https://food.ec.europa.eu/animals/animal-welfare/eu-platform-animal-welfare/platform-conclusions_en, Find here the "Guidelines for online platforms selling dogs": https://food.ec.europa.eu/system/files/2020-11/aw_platform_plat-conc_guide_dog-seller_leaflet.pdf

⁴⁶ https://food.ec.europa.eu/system/files/2023-06/aw_platform_20230615_pres-17.pdf



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7. Recommendations

7.1. Identify all consecutive dog keepers

We strongly recommend to require **any consecutive dog keeper to be identity verified in the I&R system**, not only the people involved in the dogs first registration, but also when an ownership change takes place. Unscrupulous stakeholders within the country could only step in after the breeder or importer registered the dog. After the first ownership change there is no requirement for new keepers to identity verify themselves in the pet registry. Thus, any next owner could register themselves with a fake name, and the breeder or importer might not be able to identify all the buyers by their real name. This lack of reliable data might lead to flawed traceability further up the chain, also for example when it comes to animal neglect, where the keeper of a dog would need to be accurately identified, or when identifying the source of diseases. In general, it means also a gap in the reliability of the data held in the central registry.

The tools for online ID verification such as DigID are available in the Netherlands and widely accepted. FOUR PAWS' full traceability system, including regulating the online trade, is based upon ID verified stakeholders in the dog database. Also subsequent owners, who might sell dogs onto someone else using the VeriPet system, should be able to accurately be identified within the pet registry by the microchip number used in the advertisement, for example, when problems arise after an online sale. Even when a mandatory ID verification does not become mandatory for all keepers, the government should not hinder any portal implementing voluntary ID verification of persons who wish to sell online, and identity-verified keepers should also be marked in the central database as such. Without identity verification in the portals or the central database, the suggested online checks cannot provide a secure system as illegal puppy dealers can manipulate their details in order to advertise, leaving the authorities unable to trace them.

Further, it is important to note, that a vet, not the keeper, should register the chip numbers of puppies to the mother in the portal. This would efficiently prevent that any keeper easily registers illegally imported puppies to a different bitch, which is not the mother.

7.2. RVO check

As all data on any dog within any portal come to the RVO central I&R registry, we recommend to the RVO to **check the data on any suspicious activities**. For example, to check whether private breeders breed on a scale that would need registration as a dog breeding business, if there are suspicious transfers of dogs, or if there are potentially several keepers listed with the same dog.

7.3. Manage ownership changes

There seems to be no central system in place to **manage ownership changes**, besides the previous keeper who has to de-register the dog within two weeks.⁴⁷ It is possible to register a dog on a new keeper via another portal, when a de-registration of the dog in the first portal did not yet happen, because portals are not connected to each other. Any illegal puppy dealer then could copy-paste any microchip number from an online advertisement, and register it under a fake name, which then appears to be completely legitimate, for example to misuse the registration verification of the VeriPet project, while remaining

⁴⁷ https://wetten.overheid.nl/BWBR0035248/2021-11-01#Hoofdstuk5b_Afdeling5b.4a_Paragraaf5b.4a.1_Artikel5b.68a



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completely anonymous (as then unvalidated data in the pet registries is used for cross-checking). This could also be misused by thieves, if they register stolen dogs onto themselves, in order to sell them online. Also, in case a dog was orderly deregistered by the previous owner, the new owner can enter fake data, which is not validated. Thus, we want to highlight the Irish transfer procedure, where the old keeper is obligated to **verify the identity of the new keeper and notify the database of the keepership change and indicating the new owner**. If that is not done correctly, the old keeper can be held accountable if anything goes wrong with that dog, so they will be keen to ensure the ownership change is done properly.

7.4. International traceability

To participate in **international traceability initiatives** as well as in the VeriPet project to regulate the online trade, **Europetnet membership of the RVO central I&R database** is highly recommended. A membership of all single pet registries (portals) similar as in Irish legislation⁴⁸, is a second-best option. This will allow consumers to doublecheck if a dog is registered in the Netherlands, and if the dog was ever registered in another country before. Europetnet displays in their search function a chronological order of registrations, and the latest one is on top. This would not only help to avoid the above-mentioned problem but also contribute to international dog traceability.

7.5. UBN commercial and non-commercial

In the current system you need a **UBN number in case of commercial and non-commercial keeping** (breeding, selling) of dogs.

In non-commercial situations⁴⁹ you need a UBN when:

- a. you have a nest of puppies for only one time
- b. you import a dog
- c. you have an unregistered dog which has to be registered
- d. you apply for an EU-passport for the dog
- e. you have a dog microchipped or a chip needs to be replaced

You are considered to be a commercial keeper based on several indications, like advertising and making profits.⁵⁰ And also in combination with selling, delivering, breeding or sheltering more than 20 dogs per year then you will need a Unique Business Number for commercial keeping dogs. We also recommend that **the criteria for being classified as a commercial breeder should include a significant reduction in the number of puppies** that can be sold per year. This would ensure that even smaller breeders come under regulatory scrutiny.

When registering dogs, it is now mandatory for keepers to provide their UBN. The Model Solution suggests that following the Animal Health Law implementation in April 2021, the breeder and seller establishment registration numbers (UBN in Dutch) need to be added to the registration data of single dogs and their keepers in the dog registration databases, in order to be available for information provision

⁴⁸ <http://www.irishstatutebook.ie/eli/2015/si/63>

⁴⁹ <https://www.rvo.nl/onderwerpen/identificatie-en-registratie-dieren/honden/ubn-niet-bedrijfsmatig-houden>

⁵⁰ <https://www.rvo.nl/onderwerpen/dieren-houden-verkopen-verzorgen/bedrijfsmatig-huisdieren-houden>



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for checks for the online sales. Ideally it should be clearly visible, whether the **UBN belongs to a private person or to a business seller** (a differentiation between Unique **Basic** Numbers and Unique **Business** Numbers). With the specified UBN numbers coupled with the microchip numbers, the classified ad sites could then differentiate between private and commercial keepers, persons with UBN and without, and could thus better regulate their activities. This would also ease the work for enforcement authorities when they check keeper data in the pet registries, to see immediately which person has which UBN number or none at all. Furthermore, this would help them to assess whether a private seller has a certain number of dog registrations under their name, which could indicate a business seller, and authorities could thus better identify and control their activities.

7.6. ID verification

FOUR PAWS strongly recommends **that veterinarians and chippers are obligated to verify and confirm the keeper's identity** when registering the dog⁵¹, and to add the UBN number to the keeper data in the pet registries, to ensure frauds cannot misuse other person's UBN registration confirmation. Ideally, the veterinarians are provided with access to the UBN database.

7.7. Easy centralized reporting of suspicious cases

In addition, a **centralized collection of all reports of violations and remarks** (from veterinarians in particular) would allow easier identification of dubious breeders and traders and provide the state with better means to tax them accordingly. If we understand the explanatory memorandum correctly, the central I&R database should provide this function. Otherwise, we strongly recommend a **speedy implementation of a simple reporting function for veterinarians of suspicious animals** when registering the animal in the I&R system. Because at the moment it happens that veterinarians register animals that do not fit into the current categories and should actually be registered in the category 'other', because there are actually things that are not correct in this animal registration. This results in the database being filled with incorrect registrations.

7.8. The EU Proposal and the national law against dog trafficking

The Dutch Ministry of Agriculture, Fisheries, Food Safety and Nature said it remains committed to an EU-wide Regulation against dog trafficking. At this point, we do not know the final outcome of the new EU Regulation, and how strict it will be. We therefore recommend to the Dutch government to ensure on national level mandatory, reliable, and well enforced Identification and Registration for all dogs and cats. This must include: mandating that a pet is registered to the breeder, before a pet passport can be issued, pet registries' participation in connectivity initiatives, ideally in Europetnet, and an **online trade regulation ensuring that only verified registered dogs can be advertised online by their registered keepers, and that this must be verified before an advertisement can be published**. This would further protect the Dutch consumers, ensures traceability back to each puppy's origin and helps to prevent tax evasion.

⁵¹ Identification document dog, Rhd Artikel 5b.73a.,lid 3. https://wetten.overheid.nl/BWBR0035248/2021-11-01#Hoofdstuk5b_Afdeling5b.5_Paragraaf5b.5.6_Artikel5b.73a