



Devin Wenig
CEO & President eBay Inc.,
2065 Hamilton Ave., San Jose, CA 95125

From:
Heli Dungler
Founder & President
FOUR PAWS

12th December 2018

Dear Mr Wenig,

Over 200,000 people who signed FOUR PAWS' petition, along with the undersigned leading experts, campaigners and organisations, are calling on eBay Inc to make the pet trade safer on all its classified ad sites worldwide.

For several years, FOUR PAWS International has been calling on eBay to end anonymous trading in pets on all its classified ad sites by introducing mandatory seller identification.

Classified ad sites have become the major channel through which the illegal pet trade operates. FOUR PAWS' research has provided evidence of this, along with heart breaking stories from around the world of victims of the trade, who bought their pets on eBay classified sites.

In August 2018, Gumtree UK addressed the problem of unscrupulous dealers using their site by introducing seller identification via a mandatory paywall for pet ads. Gumtree state on their site that they have introduced this measure to discourage the 'casual' trading of animals and deter unscrupulous operators from misusing their platform. This step demonstrates that Gumtree in the UK recognise that it is not the responsibility of their users to identify unscrupulous sellers during a sales transaction, but that of the classified site to deter these sellers in the first place. We would now like to see all eBay classified sites following this example and introduce seller identification on their pet sections. This will show their commitment to helping to tackle the illegal pet trade online and keeping their customers safe.

Now is your chance to earn the public's trust and show that eBay cares about its customers' safety by calling on all your classified sites to introduce mandatory seller identification for pet ads following the example Gumtree have set in the UK.



I hope that you will listen to the growing number of calls from around the world for eBay to introduce seller identification and lead the way in tackling the illegal pet trade on your classified sites.

Yours Sincerely,

Heli Dungler,



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Founder & President, FOUR PAWS

and the following persons and institutions:

Marc Abraham
BVM&S MRCVS

Television Presenter &
Practicing Vet. Founder of
Pup Aid

Prof. Thomas Blaha

Chairman of Tierärztliche
Vereinigung e.V. (TVT)

Tierärztliche Vereinigung
für Tierschutz e.V.



Prof. Dr. Klaus Buchner

MEP, EU Parliament
Brussels



Dame Judi Dench

Actress



Wolfgang Dohne

President of FECAVA -
Federation of European
Companion Animal
Veterinary Associations



Peter Egan

Actor

Bas Eickhout

Member of the European
Parliament, party:
GroenLinks

Frank Futselaar

Member of the Dutch
Parliament, party: SP

Sacha Gaus

Owner 'Martin Gaus dog
academy'

Ricky Gervais

Comedian, Actor, Writer
and Director

Reineke Hameleers

Director of Eurogroup for
Animals





Edgar van de Kamp Manager 'Martin Gaus dog academy'

Udo Kopernik Board of Public Relations
(The VDH represents Germany in the World Canine Organisation FCI)



Verband für das Deutsche Hundewesen

Oliver Krischer German politician and member of the German House of Representatives

Rafael Laguens President of FVE - Federation of Veterinarians of Europe



Federation of Veterinarians of Europe

Matt Lucas Actor and Writer

Joanna Lumley Actress, Author and Activist

Philip McCreight Leader of Tasso


(German pet register)





Paul O'Grady MBE Entertainer and
Television/Radio presenter

Gabriel Paun EU Director Animals
International



Karsten Plücker Chairman of Bund gegen
Missbrauch der Tiere e.v.



Judith Sargentini Member of the European
Parliament, party:
GroenLinks

Dr. Barbara Schöning 1st Chair Person of
Gesellschaft für
Tierverhaltensmedizin und
-therapie



Dr. Renate Sommer Member of the European
Parliament





Annex

THREE STANDARDS FOR ONLINE PET TRADE

The primary goal of implementing the three standards is to improve the traceability, transparency, and accountability of sellers, so that illegal and irresponsible selling of pets on classified advertising sites is reduced.

The three standards:

1. Seller Identify Verification
2. Animal Welfare Policy
3. Enforcement of the first two standards

Details of the three standards:

Seller Identity Verification

The first fundamental standard is the introduction of seller identity verification. Classified advertising sites should require each seller on their site (under the pet section) to submit verifiable proof of his or her identity (similar to e.g. eBay auction sites). This will deter those sellers who are performing illegal activities, such as illegal cross-border selling of puppies, from registering with the site. The introduction of seller identity verification will go a long way towards reducing both illegal and harmful trading, and will demonstrate to customers that both safety and trust is important to the site.

The following practical steps should be taken:

- **Verify seller's identity**
 - A method of verifying the seller's identity (e.g. identity check via bank account verification, interface with an identity verification company/system, or any other method which allows for safe and effective verification) needs to be implemented.
- **Only one seller account per seller**
 - A system (preferably an automated system) needs to be implemented to exclude the possibility of sellers opening more than one seller account. Multiple seller accounts enable private individuals to sell at a commercial level, without being regulated or taxed accordingly.



○ **Type of seller**

- There should be a pre-installed option, where every seller must state whether he or she is **private, commercial or a charity** (shelter, rescue centre, etc.), and definitions of these three categories should be clearly visible for all users. If the seller is a charity, or commercial, then it must provide its charity or business registration number. If the seller is private, then he or she should automatically be limited to a specified number of ads per year (maximum one animal ad of the same species per year, maximum two animal ads per year in total). If he or she intends to sell more animals, the seller should be obligated: to register as a commercial breeder/seller with the relevant public authorities; to be subject to all requisite checking by veterinary authorities; to pay all appropriate taxation; and to establish a commercial seller's account on your site. Many private sellers are operating commercially, and should, therefore, be regulated as commercial sellers.

Animal Welfare Policy

It is essential that classified advertising sites have measures in place, which protect the animals being sold on the site from poor animal welfare practices.

Requirements

- **Animals prohibited from being sold on classified ad sites**
 - Puppies and kittens which are younger than 8 weeks of age;
 - Rabbits which are younger than 6 weeks of age;
 - Guinea pigs which are younger than 4 weeks of age;
 - Mice and rats which are younger than 4 weeks of age (n.b.: sale of mice, of any age, as pet food is prohibited);
 - Birds which are not fully feathered and self-sufficient (i.e. independent from being fed by their parents);
 - Ferrets which are younger than 10 weeks of age;
 - Primates and wild-caught animals;
 - Protected and endangered species, the sale of which is forbidden by law;
 - Dangerous animals/breeds, the sale of which is forbidden by law;
 - Animals mutilated by docking, cropping, clipping or otherwise;
 - Animals sent by post/courier;
 - Gestating pets;
 - Animals which are specified as being used for fighting, guarding, sports or hunting;



- Animals to be used as live food/bait;
- Animals to be swapped for other animals/items;
- Pets for loan or rent;
- Animals specifically being advertised as gifts, e.g. as Christmas or Easter gifts;
- Animals advertised as must go within a certain period, or as urgent sales;
- Puppies and kittens which cannot be viewed with their mother;
- Animals that are imported or exported to be sold;
- Animals advertised as free;
- Animals which are advertised as 'wanted ads';
- Animals advertised for breeding purposes.

In addition:

- Pets should only be advertised by their owner;
- The ad should include the following mandatory information: age of the pet and date from which it can be sold; gender of the pet; breed/species; information about how to take care of the pet, or link to information about how to take care of the pet; medical history i.e. vaccinations; relevant certificates/documents i.e. FCI/Kennel Club/pet passport; whether the seller is private, commercial or a charity;
- Exotics – some sites have chosen to show a list of exotic animals, which cannot be sold, because they are difficult to keep as pets; our preference is for a positive list of animals which can be sold, as this gives clear guidance to buyers and sellers, and will reduce the number of unsuitable animals being sold as pets;
- No animals should be sold to anyone under the age of 18 years;
- A photo of the actual animal must be posted (not merely photos from the internet);
- There should be no photos in the ad which are demeaning to an animal, or which compromise an animal's welfare;
- The rules should be posted in a place which is visible to both the seller and buyer and can be easily accessed;
- A reporting mechanism should be in place for buyers to report anonymously sellers who have broken the rules.

Animal welfare commitment for online pet trade



“We recognize that our business facilitates the selling and buying of animals online, and that, as part of our corporate social responsibility, we have a duty to ensure that these animals are sold and bought in a responsible way so that their welfare is protected.

We expect sellers and buyers using our site to follow the principles which we have introduced, to facilitate the responsible selling and buying of animals online. These include rules regarding animals which cannot be sold on our site, to help to ensure high welfare standards.

We believe that acquiring an animal should be the result of careful planning and understanding of the species/breed and responsibilities involved. We encourage all prospective owners to research the animal they are thinking of acquiring, and to consider whether the animal will suit their lifestyle; whether they have the facilities, time, and financial means, both in the short and long-term, to take care of the animal throughout its entire lifetime.

Pet ownership is a rewarding experience, but one that needs to be carefully planned to ensure it is the right decision, and that the animal receives the correct care, according to its species.”

Enforcement of the standards

The third fundamental standard relates to active enforcement of the Seller Identity Verification and the Animal Welfare Policy. A proactive approach to ensure that all rules are followed and the relevant authorities contacted, is key to keeping classified sites safe from illegal activities and unscrupulous dealers. To give full effect to such terms, pre-posting checking will be required to identify ads which would be in breach of the rules, to prevent their being posted. Sellers who are found to be attempting to circumvent such rules should be denied further use of the site and, where relevant, reported to the appropriate authorities.