



Animal Welfare.  
Worldwide.

# Tracing the Trade:

## The FOUR PAWS Model Solution for full traceability across the European online puppy trade

# FOUR PAWS would like to thank the following experts and stakeholders for their contributions to this report:

- **Johanna Bergmann**, Swiss I&R database Amicus
- **Edie Bowles**, Advocates for Animals
- **Finbarr Heslin**, Irish I&R database Fido, Europetnet
- **Sven Hüther**, Transponder expert
- **Philip McCreight**, German I&R database TASSO
- **Sven Meyzis**, GDPR specialist
- **Jelena Moncilli**, Swiss online classified ad site anibis.ch
- **Joe Moran**, Eurogroup for Animals
- **Aleksandra Sabo**, MA Global Criminology, Utrecht University
- **Michel Schoffeniels**, Europetnet
- **Marlene Wartenberg**, Netzwerk K&R Germany (Network for Identification and Registration)

We thank Europetnet and all the pioneer classified ad sites and pet registries for their contributions and goodwill in this multi-stakeholder endeavour.



Please note, the implementation of the Model Solution is an ongoing process. To keep up to date on our progress, please visit our website at: **[www.four-paws.org.uk/tracingthetrade](http://www.four-paws.org.uk/tracingthetrade)**

We welcome your suggestions, questions and participation in the Model Solution.  
Please contact us via **[supportercare@four-paws.org.uk](mailto:supportercare@four-paws.org.uk)**

---

## Disclaimer

Responsibility for the information and views set out in this publication lie entirely with the authors. While all care has been taken to ensure that information contained herein is true and correct at time of publication, developments in legislation and changes in circumstances after this time may have an impact on the accuracy of the content.

FOUR PAWS, 2021.

# Contents

Foreword by Josef Pfabigan .....	4
1. An unprecedented opportunity .....	5
2. The FOUR PAWS Model Solution .....	7
3. The EU Animal Health Law in a nutshell .....	10
4. Benefits of the Model Solution .....	11
5. Implementing the Model Solution .....	12
5.1 Identification and Registration databases .....	12
5.2 Classified ad sites: automatically verify dogs and sellers .....	14
5.3 National governments .....	15
5.3.1 The Animal Health Law: application recommendations .....	15
5.3.2 Legislating for the Model Solution .....	16
5.3.3 Establishing a competent authority .....	16
5.4 GDPR requirements for the Model Solution .....	17
6. Applying the Model Solution in the United Kingdom .....	18
7. What gaps need to be bridged to reach full traceability in the United Kingdom? .....	22
8. Next steps .....	26
9. Conclusion .....	26
10. Appendix .....	27
10.1 Expert and supporter statements .....	27
10.2 Best practice examples: components of the Model Solution already in action .....	30
10.3 Description of Europol's PetSAFE .....	33
10.4 EU Member States without mandatory identification and registration of dogs .....	35
10.5 A check of Microchip and Pin: the 'Irish Model' .....	36
10.6 EU Animal Health Law .....	39
11. Literature .....	39
12. References .....	40



# Definitions and abbreviations

<b>AHL:</b>	Regulation (EU) 2016/429 of the European Parliament and of the Council of 9 March 2016 on transmissible animal diseases and amending and repealing certain acts in the area of animal health (the 'EU Animal Health Law'). The law requires all sellers, breeders, transporters and assembly centres of dogs and cats to register their establishments with the national government.
<b>Approved establishment:</b>	Any permanent, geographically limited establishment located in the territory of an EU Member State, subject to stricter animal health requirements, hygiene and cleaning rules and approved by the competent authority in accordance with Article 96(1) of Regulation (EU) 2016/429.
<b>Assembly centre:</b>	Under the AHL, this refers to an establishment in which dogs, cats, or ferrets of the same health status are assembled from multiple establishments before being moved to another Member State.
<b>Breeder/seller establishment:</b>	A place where dogs are kept for breeding or selling purposes.
<b>Classified ad site:</b>	A classified ad site is an internet platform where individuals (not necessarily businesses) can buy and sell items. The advertisements are grouped into categories or classes. In the past, classified ads were usually posted in newspapers or periodicals, nowadays this is primarily conducted online.
<b>Competent Authority:</b>	The central veterinary authority of a Member State responsible for the organisation of official controls and any other official activities in accordance with Regulation (EU) 2016/429; or any other authority to which that responsibility has been delegated.
<b>Dogs:</b>	In this report we refer mainly to dogs, but our solution would cover other rabies transmitting companion animal species that can be registered, such as cats.
<b>I&amp;R:</b>	Identification and Registration. Identification refers to microchipping of dogs, and the registration of their details on a pet microchipping database ('I&R database').
<b>Owner:</b>	The person to whom the dog is registered with in an I&R database and is the keeper of the dog.
<b>Transponder:</b>	A transponder is a device the size of a grain of rice that is injected under the skin of a pet. It contains a microchip with the animal's unique identification number (the so-called microchip number) an antenna for communication, and glass to protect the electronics.
<b>Transporter:</b>	An operator transporting animals on his own behalf or on behalf of a third party.

# Foreword by Josef Pfabigan

© FOUR PAWS / Adrian Almasan



**The illegal puppy trade is a hugely profitable industry based on exploiting animals and deceiving the public, posing a risk to both human and animal health.**

Countless puppies are bred in cruel conditions and transported illegally across Europe every year to be advertised for sale on classified ad sites. They are often sick, unvaccinated, and too young to be separated from their mothers. The trauma inflicted on these dogs is unimaginable, and **some of the puppies die shortly after arriving in their new homes.**

**Puppy smuggling is considered an extremely lucrative business** as profits are high, prosecutions low, and punishments not harsh enough. With the demand for puppies growing every year, puppy dealers can purchase a puppy for as little as 50 euros and sell them on for an enormous profit. During the COVID-19 pandemic, a spike in the demand for puppies pushed the prices to previously unseen heights – with popular breeds regularly fetching in the region of 2000 – 4000 euros and above.

**Unscrupulous puppy dealers often pretend to be private breeders and go to great lengths to disguise their commercial business making it difficult to differentiate them from responsible breeders.** FOUR PAWS is calling for better regulation of the online sale of puppies due to the ease in which puppy dealers can anonymously advertise on classified ad

sites and then disappear if there is an issue, for example if the puppy dies.

Reliable pet and owner registration is the key to ending the illegal online puppy trade. This, in addition to registering all breeders and sellers of puppies, will help to greatly reduce this trade. FOUR PAWS has developed a system that classified ad sites can use to verify the identity and details of anyone wishing to advertise a puppy, along with the details of the animal being sold.

The new EU Animal Health Law was introduced in 2021 and will be vital to achieving our goal of phasing out the illegal puppy trade as it requires all breeder and seller establishments to be registered. The FOUR PAWS Model Solution builds on this and mandatory microchipping to enable the verification of both the owner and animals being sold online. **Mandatory identification (microchipping) and registration of dogs on national pet microchip databases is essential for this system to work across the entire EU, and we call on the few remaining EU countries without mandatory I&R to legislate for it.**

**Unscrupulous dealers do not want to be traced and their business relies on the anonymity provided by classified ad sites.** This report details how we can effectively block market access for illegal puppy traders by stopping this anonymity and greatly reduce the illegal online puppy trade.

The FOUR PAWS Model Solution provides the key to the effective regulation of the online puppy trade and we call upon governments to tighten up national legislation regarding online pet advertisements and I&R, to ensure this solution can work to its full potential and that the online pet trade is properly regulated.

**Together we can end the suffering inflicted by this trade, protecting millions of dogs and pet owners across Europe.**

**Josef Pfabigan**  
CEO and Chair of the Board  
FOUR PAWS

# 1. An unprecedented opportunity

**The illegal puppy trade is an increasingly lucrative industry across Europe, rife with animal cruelty and deception.**

**The numbers of dogs bred and transported illegally has grown exponentially over the past decade.**

Thousands of breeding dogs are kept in appalling conditions and vulnerable puppies are separated too early from their mothers, smuggled long distances across borders and sold on classified ad sites for huge profit. This happens often in breach of the EU's trade and health legislation, without identification or vaccination documents and with dogs coming from non-rabies-free countries.

**Consumer demand, driven by a multitude of factors such as popular media and celebrity culture, has led to the mass breeding of puppies in Eastern Europe to supply the demand in Western Europe.**

Add to this the increased ease of selling online with complete anonymity, and today's culture of instant gratification and impulse purchases, and we have a serious problem on our hands.

For over a decade, FOUR PAWS has investigated, researched and campaigned on this issue throughout Europe; uncovering the scale of the trade, the manifold risks to both humans and animals, as well as possible routes to tackling it.

However, the illegal puppy trade is not only an animal welfare problem. Illegal puppy trading is a major organised crime within the EU, as per the United Nations' definition of an organised criminal group as 'a structured group of three or more persons, existing over a period of time and acting in concert with the aim of committing one or more serious crimes... in order to obtain, directly or indirectly, financial or other material benefit'<sup>1</sup>.

In 2021, the European Commission noted that companion animals are traded illegally, 'often on a large scale and sometimes with potential devastating

consequences' and thus deserves particular attention<sup>2</sup>. The illegal trade also poses a significant public health risk. The puppies are raised in unsanitary conditions and are inadequately vaccinated, if at all, meaning that they can potentially carry diseases of real threat to animal and human health. Illegal dog trading undermines genuine breeders, saddles unsuspecting consumers with emotional and financial costs, and facilitates tax evasion with the fraudulent nature of its transactions. For the EU, the illegal cross-border trade compromises its veterinary public health efforts, distorts the single market and leaves European consumers with no protection of their rights.

**In today's market the internet facilitates the illegal trade, with the online trade of puppies in Europe observed at more than €1 billion across three major classified ad sites alone<sup>3</sup>. Classified ad sites are the ideal channel to market for illegal traders, offering them easy access to a huge pool of potential buyers.**

With limited regulation and usually no requirement to verify the identity of a seller, these platforms offer rogue traders complete anonymity to advertise illegally imported puppies with little threat of being identified and prosecuted.

This lack of traceability is a critical issue. Puppy dealers can simply disappear once a sale has been made, leaving pet buyers to deal with sick animals and high veterinary costs. With no records of a dog's origin, diseases cannot be traced back to their source. And until now, there has been no legislation in place across the entire European Union to address this problem.

The introduction of the EU Animal Health Law (AHL) in April 2021 therefore presents an unprecedented opportunity in the campaign against the illegal puppy trade. The AHL will require all breeders, sellers, and assembly centers of dogs to register their establishments (where the animals are kept) with the competent authority, and transporters will need

to register their operations<sup>i</sup>: a significant first step towards greater traceability and accountability within the trade.

However, this is only the start. Based on our research and investigations, FOUR PAWS is calling for a coordinated response from the entities most closely related to the puppy trade and its regulation – identification and registration databases, classified ad websites, and national governments. We are asking them to take this landmark legislation and build on it, seizing the opportunity to make a real difference. Together they can facilitate not just the required registration of establishments, but the collation of more comprehensive data records for every dog, stricter regulation of advertising on classified sites, solid legal frameworks to enforce requirements, and comprehensive interlinking of all these elements. Coordinating a connected, practicable response to stamp out the illegal puppy trade once and for all.

We are calling this response the **FOUR PAWS Model Solution for full traceability across the EU online puppy trade**.

**If implemented as FOUR PAWS proposes, the Model Solution could achieve a range of outcomes including improved animal welfare, better animal and human health, increased tax revenue, and greater consumer protection:**

- Protection of the public from zoonotic diseases such as rabies
- Prevention of acts of bio-crime between Member States
- Providing enforcement authorities with efficient means of identifying the source of sick animals posing a threat to public health
- Allowing enforcement authorities to identify stakeholders involved in fraudulent activities
- Increased tax revenues for governments through being able to properly identify commercial sellers
- Prevention of illegal puppy dealers from participating in the market
- Protection of consumers from buying illegally-imported and potentially sick dogs
- Protection of legitimate and responsible breeders from unfair competition.

This report aims to highlight the opportunities afforded by the introduction of the EU Animal Health Law and to outline how the Model Solution will work, what actions are required of the various agencies involved, and the benefits of their involvement.

This report also provides case studies detailing elements of the Model Solution that are already in place in several European countries.

**Together we can bring traceability and accountability to the EU puppy trade and improve the welfare of millions of companion animals.**

---

<sup>i</sup> The establishments are registered in a central national establishment registration database.

## 2. The FOUR PAWS Model Solution

**The FOUR PAWS Model Solution aspires to eliminate illegal puppy trading across the European Union through rigorous implementation of the EU Animal Health Law at a national level, with the co-operation of I&R databases, classified ad websites, and national governments.**

The introduction of the landmark Animal Health Law (AHL) in April 2021 will enable far greater transparency of the trade in puppies – preventing the spread of disease and improving animal welfare. With the timely opportunity this presents,

**FOUR PAWS is calling for collaboration between I&R databases, classified ad sites, and national governments to facilitate a comprehensive joined-up approach**

to enact the legislation in as far-reaching a way as possible, enabling full traceability and regulation of the trade on a lasting, pan-European basis.

**The law itself will require all dog breeders and sellers to register their establishments with their competent authority; upon which they will be issued with an individual registration number.** Registration should cover both private and commercial sellers. Most unscrupulous breeders and sellers will not want to register their establishment because that would mean that they can be identified and traced. Once all genuine breeders and sellers have their own registration number, this opens up a variety of possibilities for systems of traceability and verification both online and offline.

Registration requirements, as specified under the AHL, are a huge first step in countering the dangerous illegal puppy trade.

**However, to be able to really stamp out illegal practices we need traceability not only of the breeders and sellers, but of every individual dog, for their entire lifespan.**

**FOUR PAWS is championing the universal implementation of national digital I&R databases which provide full traceability and identification of stakeholders throughout a dog's lifecycle:** breeder, seller, transporter (including their status and registration number as specified under the AHL), the microchipper and registering qualified professional, as well as all consecutive owners. To achieve this, there would need to be a legal requirement for mandatory microchipping of every pet, and legal obligations for I&R databases to collect reliable data covering all stakeholders involved in the dog's life.

**These comprehensive I&R databases – some of which are already in use across the EU – would then need to be linked to information in the national database of registered establishments (which are required by the AHL).** This could be easily done by adding the registration numbers of breeders and sellers into the I&R databases. Full pet and breeder/seller traceability can thus be achieved, enabling enforcement agencies to quickly identify the origin of every sick puppy, track the whereabouts of any stakeholder involved with the animal, or flag up incomplete records raising suspicions about the breeder or seller.

The final part to the FOUR PAWS Model Solution is to work with classified ad sites to achieve better regulation of the online trade of dogs. As the main selling channel favoured by illegal puppy dealers, **FOUR PAWS is recommending that classified ad sites use an automated checking system which links to the I&R databases,** to ensure only microchipped dogs that are registered to the seller in an I&R database can be advertised on their sites. All breeders and sellers should also be obligated to prove that their establishment is registered with the competent authority on a national establishment database (as required by the AHL) and provide their individual establishment registration number before their advert can go live. The classified ad sites could then quickly and easily verify the registration number of the seller and the registration details of the dog to ensure everything is above board.

Going one step further, co-ordination by international entity Europetnet<sup>ii</sup> will enable the provision of the necessary information from national databases and

---

<sup>ii</sup> Europetnet is a group of national and local associations based across Europe who register owner information about pets that have been uniquely identified with a transponder. <https://www.europetnet.com/about/about.html>



the **creation of a technical tool to provide a checking service for all classified ad sites across Europe.** With this interface, the classified platforms can verify that the animal's microchip is correctly registered to the seller. They could also potentially receive information about the animal (for example age, breed, sex), as well as verify if a seller operates a legally registered establishment on a national establishment registration database, as required by the AHL. This technical tool has the working title 'Europetnet's PetSAFE' (Pet Secure Authentication for Exchange).

Overall, the Model Solution will benefit a whole range of stakeholders – from the classified ad sites seeing an improvement in their customer safety and company reputation; to national governments reducing the risk of cross-border spread of disease and clamping down on tax evasion; to puppy buyers being protected from fraudulent sellers.

The recommended actions are neither complicated nor cost-prohibitive; in fact, some elements are already in place in many European countries.

### **With the Model Solution implemented, EU-wide full traceability of pets could finally be achieved, and illegal puppy dealers could be excluded from the market.**

This would be **a critical step in improving disease prevention, consumer safety and protecting both animal and public health.**

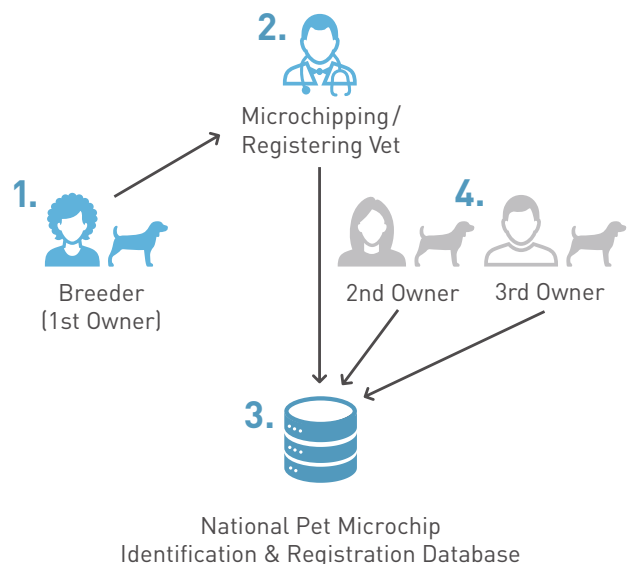
As this report demonstrates, there are systems in place around the EU which could enable effective regulation and full traceability of the online puppy trade. However even without adherence to specific EU regulations, the United Kingdom is equally able to implement the fundamental elements of the Model Solution. We outline how this could be achieved in the section, 'Applying the Model Solution in the United Kingdom'.

### **A step-by-step explanation: FULL TRACEABILITY AND A REGULATED ONLINE MARKET**

The diagrams below outline the process that enables full traceability and identification of registered animals and of the breeders and sellers who sell the animals on classified ad sites.

#### **Step 1.**

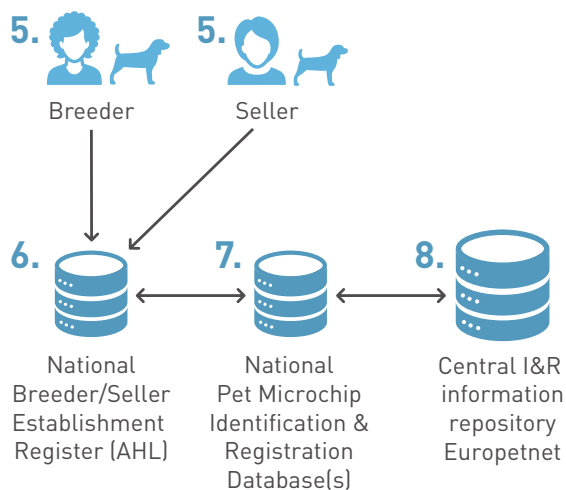
1. The breeder takes the dog (puppy) to a vet for micro-chipping.
2. The vet implants a transponder (microchip) into the dog and enters the unique microchip number and breeder's details as the first owner of the dog into a national pet microchip (I&R) database.
3. The breeder's information is held on the national pet microchip database (I&R) database. The vet who implants the transponder should also be recorded in the pet microchip (I&R) database.
4. Each subsequent owner throughout the dog's life, including those who only intend to sell the dog or own the dog for a short period, such as a shelter, should also be listed in the pet microchip (I&R) database.



## Step 2.

5. Breeders and sellers will be required under the EU Animal Health Law to register their breeding/selling establishment on a national establishment registration database.
6. The national registration database will issue a unique registration number for each establishment.
7. The unique establishment registration number should be entered onto the national pet microchip (I&R) database, and should be linked to the individual dog's microchip number. This should be a mandatory requirement.
8. A specific set of information recorded in the national pet microchip (I&R) database is provided to Europetnet, the central repository for information pertaining to I&R of companion animals across Europe.

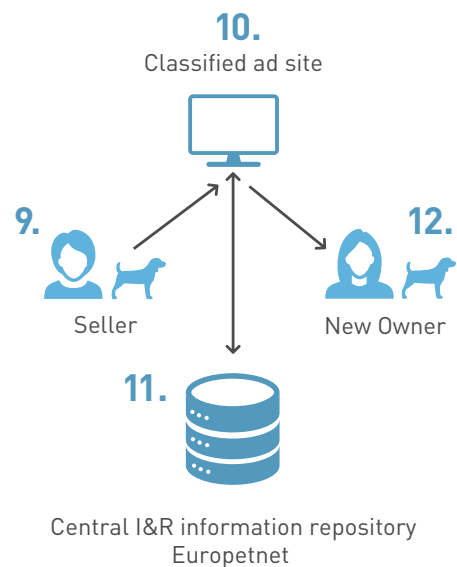
It should be a mandatory requirement that each European pet I&R database is a Europetnet member.



## Step 3.

9. If a seller – that is, either a breeder, third-party seller (in jurisdictions where they are legally allowed to operate), or pet owner – intends to sell a dog on a classified ad site, they will need to first register the specific animal to themselves, and provide identifying information to the classified ad site before their ad can be placed. This information must include the dog's microchip number and the seller's contact details that are also registered in the I&R database (mobile phone or email).
10. The classified ad site will then send this information to Europetnet.

11. Europetnet will check this information against the relevant national pet microchip (I&R) database. If the microchip and contact details are correct, a onetime code is sent to the seller which must be input to publish the ad. If the information is incorrect then the ad cannot be placed on the classified ad site.
12. Once the ad is live, the seller can sell their dog on the classified site to a new owner. If there are problems later with an animal, for example a dog is found to have been illegally imported, then the authorities can find the seller's details via the dog's microchip number, and find more information on all stakeholders in the national pet microchip (I&R) database, and quickly take action. Depending on agreement between the I&R database and the classified ad site, the tool can also instantly fill the fields of the advertisement with more information about the dog from the I&R database, such as age, breed, sex, as well as the breeder and seller establishment registration number. This depends on the availability and provision of the data by the pet registries.



### 3. The EU Animal Health Law in a nutshell

The EU Animal Health Law (AHL) is designed to provide prevention, protection and control measures against transmissible animal diseases, and applies in all EU member states since 21 April 2021.

**The law requires all sellers, breeders, transporters and assembly centres of dogs, cats and ferrets to register their establishments with the competent authority.**

The law calls for **no exemptions in the case of dog-breeding facilities**, as they are regarded as posing a particular health risk.

Also, the AHL stipulates that assembly centres that move animals to other Member States can only accept animals originating from registered establishments – so unregistered establishments will find themselves unable to sell their animals to these centres.

Mandatory registration will also extend to dog transporters, due to the health risks posed by their activity. However, the Member States reserve the right to alleviate this obligation in specific low-risk cases.

The AHL also serves as the legal basis for the establishment of a harmonised I&R system for dogs, cats and ferrets across the EU. However, the Delegated Act needed to introduce this provision has not been yet put forward.

## 4. Benefits of the Model Solution

To achieve the comprehensive traceability of pets that the Model Solution seeks, commitment and collaboration from several major stakeholders is vital. I&R databases, classified ad websites, and national governments will need to work together to ensure legislation, systems and competent authorities are coordinated to make the solution workable.

But what do the major players get in return for their collaboration? Aside from being able to play an important role in ending the cruel illegal puppy trade, there are a number of substantial, quantifiable benefits to their involvement.

### Benefits to I&R databases

I&R databases will no longer simply be platforms to help reunite lost and stolen pets but will play a pivotal role in addressing the illegal puppy trade. I&R databases will be vital to collecting data and enabling checks, ensuring full traceability of an animal throughout its lifetime.

**The databases are regarded as highly trusted authorities by law enforcement agencies in uncovering malpractice.**

### Benefits to classified ad websites

By introducing automated checks to verify the advertised dogs' registration to an identifiable seller, classified ad sites will instigate a major deterrent to illegal puppy dealers.

**In doing so, the sites will improve their own reputation, they will be able to present themselves as responsible and animal welfare minded, and clearly taking consumer security and protection very seriously.**

Eliminating the advertising of illegally-imported and potentially diseased animals can only be a good thing for business, building trust and confidence amongst consumers and encouraging more legitimate sellers to use their platforms to increase traffic and revenues.

### Benefits to national governments

In passing legislation to facilitate improved identification and registration systems and regulate online trading via classified sites, governments will be improving the transparency and traceability of companion animals and their provenance, as well as reducing illegal trading activity. The benefits to this are manifold: reducing the risk of cross-border spread of disease and bio-crime; enabling any diseases which do spread to be quickly traced back to source and dealt with; improving consumer safety and confidence online; reducing fraudulent activity in online trading as well as reducing tax evasion; and more effective law enforcement in pet-related crime with authorities having quick access to accurate information.



## 5. Implementing the Model Solution

**How does the Model Solution work, and what actions are required of the stakeholders involved?**

Registration of breeding and selling establishments, as required under the Animal Health Law, is a huge step towards ending the illegal trade in puppies.

However, FOUR PAWS believes this is only the beginning. The Model Solution, as outlined above, is our comprehensive proposal to facilitate complete traceability and eliminate illegal puppy trading across the European Union and beyond.

**The solution is a win-win all round for animal welfare, disease prevention, fraud reduction and consumer protection.**

It will be implemented across several fronts:

- Utilising I&R databases and expanding the information they hold
- Refining a technical solution allowing classified ad sites to better control which animals are advertised via their platforms
- Implementing the EU Animal Health Law at Member State level efficiently, so that it is effective in reducing both public and animal health risks
- Interconnecting these elements to achieve an effective pan-European system.

Many of these actions are already established in some European countries and will only need some adaptation or extension. **The next pages detail what actions are required of Identification and Registration databases, classified ad sites, and national governments to eliminate the unscrupulous pet trade.**

### 5.1 Identification and Registration databases

National I&R databases are already in place across the EU, enabling a move towards greater transparency and accountability in the international pet trade. The Model Solution would require a few complementary steps be taken to regulate, expand and interconnect these databases, and replicate them in other countries.

- (a) Legislation must be passed making it compulsory for all dogs to have a transponder implanted in them and registered on a private or public I&R database.
- (b) All private or public databases will need to be approved by competent authorities.
- (c) All dogs must be microchipped and registered by the age of eight weeks or prior to their movement from the place that they were born, whichever event is first, and registered to the breeder – whether professional or private – as the first owner.
- (d) Each dog must be assigned a single, verified, and guaranteed unique animal identification number, in accordance with the measures and procedures of ISO 24631-1, and fully conforming with ISO 11784, 11785<sup>iii</sup>.
- (e) Chipping and registration must be carried out by a qualified professional, usually a vet. Breeders can only chip and register the pets themselves if they complete relevant training according to §21 or 22a of Regulation (EU) 576/2013, and are listed as an approved person to chip and register; otherwise illegal dealers will still be able to circumvent the system.
- (f) The qualified professional carrying out the chipping must register the animal's date of birth, place of birth, breed (according to the breed list outlined by Europetnet which includes crossbreeds), sex, description of the dog, microchip number and passport number (if required), owner identity, owners' status (including their registration number as specified under the AHL, or as a private person), and date

---

<sup>iii</sup> To verify the validity of the microchip numbers the Deep Validation Control DVC or a similar ISO validation system can be used. See <https://www.icar.org/index.php/certifications/animal-identification-certifications/code-check/>

of pet's registration. Upon registration, the owner's identification must be verified by either the vet, another qualified professional or other identity verification solutions which might be available in different countries (such as NemID, in Denmark), in order to ensure that reliable details are entered into the database.

- (g) If the owner runs a registered establishment, the owner's establishment registration number should be transferred into the pet registry: A registered establishment's operator or a registered transporter should have their status and unique registration number entered into the I&R database along with the dog's record. This information should be accessible to the vet logging onto the establishment register in a Member State (which is required under the AHL) Alternatively, the registered establishment information could be entered by competent authorities directly into the I&R database; or the I&R database and the establishment database could be linked. All persons/establishments should be registered with their address.
- (h) Dog owners must be required to inform the I&R database if they move, if they give or sell their pet to another keeper, or if their pet has died.
- (i) The details of every person involved in a dog's lifespan from birth to death will be saved in the I&R database using the dog's microchip number, including: breeder information, registering and microchipping vets, animal sellers, consecutive owners, including shelters, and ideally transporters. These stakeholders need to be traceable and identifiable in the database so that in the event of a disease outbreak or illegal activity, authorities can easily and quickly trace the origin of the dog as well as all involved breeders, sellers and vets.
- (j) If a puppy is imported from abroad, the importer – whether professional or private – needs to be registered as the first owner in the I&R database.
- (k) The microchip and pet passport number(s) should be linked by registering them in the I&R database (currently some pets have several passports).
- (l) The functionality of the database should allow the extraction of data regarding the activities of individual stakeholders (e.g. how many dogs are linked to a breeding establishment, or to a

specific vet). This will allow authorities to note any irregularities and take measures to address the situation.

- (m) Designated competent authorities must be able to access the information in the national I&R databases, preferably every I&R database within the EU.
- (n) Every national I&R database must be required to provide certain data to the pan-European membership entity Europetnet, as this data will be to be used to support the classified ad sites with their back-end checks. Data provision to Europetnet enables international, chronological traceability of pets across borders, via their public microchip search function<sup>4</sup>.
- (o) The I&R database should generate a registration certificate for each owner-dog registration and provide it to the owner. An identity-verified owner is a pre-requisite for such a certificate. This certificate can be used to facilitate dog transfers to new owners, and proper ownership transfer management in the I&R databases, especially when several pet registries are operating in a country. Owners need to inform the I&R database of ownership transfers, including the verified name and address of the new owner<sup>iv</sup>. New owners need to register/confirm the registration of the animal to themselves within a few days upon acquisition and verify their identity to the pet registry. They will then be issued a new ownership certificate. It must not be possible that new owners can simply register a dog without any official ownership transfer.
- (p) For the online back-end checks, the following data must be provided to Europetnet in real time after a change in the I&R database:
  - i For the ownership verification: The dog's microchip number and current owner contact data<sup>v</sup> such as mobile phone number and/or email address needs to be provided.
  - ii In the future, further data on the dog, as well as the owner may be made available to the classified ad sites for the checks, for example date of birth, breed and sex of the dog; type of operators as specified under the AHL including the registration number; potentially also their name and address<sup>vi</sup>.
  - iii For a regular Europetnet membership, I&R databases must comply with the rules and

<sup>iv</sup> Identities could be verified, for example, by following the process for changing ownership in Ireland, as outlined in the appendix.

<sup>v</sup> Exemptions to providing personal data to Europetnet's PetSAFE are possible when the I&R database prefers to issue the one time code itself, and are

explained in the documents in the annex. However, our preferred method is for Europetnet to send one time codes.

<sup>vi</sup> Depending on national laws and requirements for the online trade of companion animals.

conditions of membership, follow a formal application process and be accepted by the General Assembly. After joining Europetnet, the I&R database must comply with the transfer of data protocol of Europetnet which means sharing several data fields, including, but not limited to the microchip number and the date of registration.

- (q) Data on a dog should be kept for a minimum of 10 years following the animal's death.
- (r) Additional valuable information for I&R databases to hold (although not required for the Model Solution) would include neuter status and noting of a dog being lost or stolen.
- (s) All microchip numbers across the EU should ideally include country codes (including manufacturer traceability code), to further indicate the origin of the dog.
- (t) Pet Passports should have several pages to avoid having to replace the Passport with every two changes of ownership. The Passport would then become a lifetime document for the animal and ensure greater traceability<sup>vii</sup>. FOUR PAWS and Europetnet both recommend a switch to an electronic pet passport<sup>5</sup>.
- (u) If a Pet Passport is lost or stolen, notice should be given to the database. Only then should the vet issue an interim passport for the travel period (max. 3 months). The new Pet Passport then needs to be validated via a competent authority (approved vets according to 576/2013 are also accepted). The new number should then be entered into the national I&R database.

## 5.2 Classified ad sites: automatically verify dogs and sellers

Online classified ad sites are a prime channel for selling dogs across Europe, as they provide sellers with easy access to a significant pool of potential buyers as well as usually complete anonymity for unscrupulous traders. The Model Solution aims to remove this anonymity, by asking classified ad sites to only allow sellers to advertise their dogs if they are microchipped and registered on a I&R database.

To this end, FOUR PAWS is asking the classified ad sites to undertake the following:

- (a) Facilitate the operation of automated back-end checks against a supra-national entity that receives the relevant information from European I&R databases, i.e. Europetnet. A large number of European I&R databases are already members of Europetnet. Even if there are several I&R databases within one country, many of them are already members of, or linked to, Europetnet.

Potentially, if there are several databases in one country, these could also form an 'alliance of registers' as described in the 'Best practice examples' section under 'Access to several national databases with one common interface: Germany'. This 'access point' could then provide the relevant data from one country to Europetnet.

- (b) This back-end check will be carried out via an interface not visible or accessible to the public.
- (c) The check must be mandatory for any and all dog sales. It must not be possible for the system to be by-passed. For example, classified ad sites are responsible for preventing dog adverts being listed under the wrong category.
- (d) If a seller wants to post an advert on a classified ad site, they need to enter the dog's microchip number and the seller's contact details listed in the pet registry (mobile phone or email address). The information is then sent automatically to Europetnet's application programming interface (API) that verifies this information against the pet registries. If all the information given by the seller is confirmed as correct, the person to whom the animal is registered in the pet registry will receive a one-time code sent to their registered phone or email address, which is needed to publish the ad.

With the consent of the databases and the owner, the back-end check may eventually provide additional information to the classified ad sites. With availability of the data, consent of the databases and the owner, prefilling of other fields such as colour, sex, breed and date of birth, with data pulled from the I&R database via PetSAFE and provided to the classified ad site will be possible:

- i On the dog: data such as breed, sex, country of registration, and date of birth, the microchip number and further verified information will be public in the ad, and the relevant fields cannot be changed by the seller post-check.

---

<sup>vii</sup> The pet passport system, whilst covered by the AHL, will only change from 1 April 2026 – five years after the application of the rest of the law.

- ii On the owner: if the owner has a registered establishment under the AHL their establishment registration number can be provided for the check; name and address could be delivered.
- (e) The following requirements must be fulfilled by classified ad sites to fully implement this system:
  - Request a new ‘user role’ at Europetnet.
  - Create new online forms with mandatory fields which advertisers must complete.
- (f) Further recommendations for classified ad sites (independent of the Model Solution) include:
  - If country codes for microchips numbers become mandatory in all EU Member States, classified ad sites could automatically display the country of origin on each advert, giving valuable information to the prospective buyer about the origin of the dog.
  - Verifying the identities of sellers (before their ad goes live) advertising animals other than dogs (some of which cannot be chipped or registered).
  - Limiting the number of user accounts to one account per person and limiting the number of animal ads per private seller per year.

Including a site rule which states that dogs from their own country may only be handed over to a new owner from eight weeks of age (at the earliest). Litter announcements should not be allowed, as each single puppy should be registered and checked before it can be advertised. Several puppies’ microchips can be checked within a single advertisement.

## 5.3 National governments

National governments will play a critical role in making the most of the opportunities afforded by the Animal Health Law and transforming the Model Solution from a voluntary initiative to a watertight EU-wide traceability system.

To conform with the Animal Health Law and support the full roll-out of the Model Solution, FOUR PAWS calls on national governments to implement the following laws and measures, none of which are prohibitively complicated or costly, but which will make a substantial difference to eliminating the illegal puppy trade, helping to reduce the risk of spread of diseases as well as improving consumer safety.

### 5.3.1 The Animal Health Law: application recommendations

The AHL itself will provide only a rough framework for companion animals’ traceability. While it is an important milestone providing vital groundwork, there are a number of other measures which need to be implemented at the national level to enable full traceability.

- (a) National governments must focus time and resources on the enforcement of the obligation to register establishments and operators (as per the AHL). Establishment registers need to be fit for purpose, nationally centralised, digital, and accessible to competent authorities from all EU Member States, in order to provide efficient means for investigation.
- (b) This central digital register should ideally include transporters, approved establishments<sup>viii</sup> and registered establishments.
- (c) FOUR PAWS is calling on governments to register breeders and sellers from the very first animal they have bred/sold/given away, onwards. It is crucial there is no loophole for illegal puppy dealers who present themselves to buyers as private hobbyist breeders with only one litter. In countries where there is no mandatory I&R there is an especially high risk that illegal puppy dealers will continue to operate invisibly, and without being taxed.
- (d) Operators of registered and approved establishments are obliged to keep records of their activities, which according to the AHL, can be done on paper. However, FOUR PAWS strongly recommends that these records are digital and not paper based. FOUR PAWS furthermore recommends that this record keeping is carried out via an authorised professional and entered directly into the I&R databases and includes identification information (for example name and establishment registration number). Only then can the source of an animal be identified.
- (e) There should be a link established between the I&R databases and the establishment registers. At a minimum, the name of the operator of an establishment and their establishment registration number should be available in the I&R database, tied to the specific dogs and their microchip numbers. The address and further details can then be found quickly by authorities in the establishment register.

<sup>viii</sup> A certain type of establishment keeping terrestrial animals or handling or storing germinal products that poses a significant animal health risk, needs to comply with higher biosecurity measures, and it is therefore subject to approval by the competent authority.



- (f) Any breeder with more than three breeding bitches should have to register as an *approved* establishment due to the higher risk posed by their activities.
- (g) A breeder who buys additional dogs from other breeders within a member state without the purpose of selling them abroad should have to register as an assembly centre. This will make it clear to buyers that this breeder also sells dogs that have been purchased from another breeder. In addition to being a breeder, this person is also a seller.

### 5.3.2 Legislating for the Model Solution

In addition to implementing the AHL itself, there are several laws and measures which could be passed at national level to help bring the Model Solution to fruition.

For example, legislation could be introduced to:

- (a) Make it compulsory for all dogs to be implanted with an injectable transponder by eight weeks of age at the latest and registered on a national (government or private) I&R database, with the breeder as the first owner.
- (b) Make it compulsory for all national I&R databases to be a member of Europetnet<sup>ix</sup>, which, beside online trade regulation, will also ensure international traceability of the animals.
- (c) Make it a legal obligation that any classified ad site offering the sale of dogs must implement back-end checks on all dog advertisements. Only dogs proven to be registered by identifiable sellers can be sold online, and this should be the only legal way to advertise dogs online.
- (d) Mandate that each puppy must be registered and checked by Europetnet's PetSAFE before it can be advertised online<sup>x</sup>. Online advertisements of unregistered puppies should be banned.
- (e) Make it illegal to sell animals online via social media channels and closed forums.
- (f) Introduce significant penalties for breeders and sellers who fail to register their animals or fail to keep their registered information up to date. Penalties for anyone caught with unregistered or unidentified dogs need to serve as a real deterrent. Also, considerable penalties must be applied for providing misleading information and advertisement (e.g. if a seller states dogs are

'home-bred', but in reality they have been obtained from another source). Transporters must also register the animals.

- (g) Promote microchipping and registration at an age below eight weeks or before it is moved from the site of its birth in order to support the check of each puppies' registration for online advertisements. This aids breeders who want to establish contact with a new owner before the animal is old enough to be given away or sold, but ensures greater security than a check of the mother animal's chip in litter advertisements. With the latter, there is no control over the puppies the breeder sells, as the puppies are not reflected in the I&R database.
- (h) Beyond the Model Solution, which verifies pet registrations on their advertisers, we recommend making it a legal obligation that seller identities are verified for the online sale of any companion animal species.

### 5.3.3 Establishing a competent authority

For the Model Solution to function effectively, it is important that a competent authority in each Member State is clearly designated responsible for the national establishment registration database, controls, such as on the spot inspections, and the handling of complaints regarding breeder/seller establishments.

The appointed authority must have the relevant competencies and resources to deal with complaints, and all complaints should be recorded onto the national registration database. Complaints should be investigated and breeders and sellers should be removed from the national registration database if they are found to be taking part in illegal activities.

The I&R database or the competent authority should maintain a list of any microchip numbers as well as any pet passport numbers authorized by a competent authority. The details of the vet who received and provided the microchip and passport numbers must be documented by the competent authority; any vets providing blank passports and transponders, or engaging in other illegal practices, can then be easily identified by the authorities.

<sup>ix</sup> Either each national database separately, or an alliance of national databases provides the national data to Europetnet. The main objective is that Europetnet receives the data.

<sup>x</sup> See the Irish legislation for 'Sale and Supply of Pet animals', requiring a microchip code for each advertised dog. <http://www.irishstatutebook.ie/eli/2019/si/681/made/en/pdf>.

## 5.4 GDPR requirements for the Model Solution

Since the introduction of the EU General Data Protection Regulation (GDPR) in May 2018, the handling, storing and processing of any personal data has become more tightly controlled. In the FOUR PAWS Model Solution, there are several elements which involve the collection and handling of personal data, so it is vital these elements comply fully with all data protection requirements.

To ensure compliance, FOUR PAWS consulted GDPR expert Mr. Sven Meyzis, who considered the Model Solution's GDPR feasibility. He concluded:

*"We have checked the basic feasibility of the Model Solution from a data protection perspective, with particular focus on the usage of data. Features such as information provided via email, texts for declarations of consent or data protection declarations need to be designed/clarified in a further project phase."*

***At this stage, and in line with information provided, the Model Solution can be achieved from a GDPR perspective."***

There are, however, several areas in which special care must be taken to ensure GDPR compliance:

### **GDPR compliance when collecting data in I&R databases (or other databases):**

- It should be required by law that all data needed for full traceability and back-end checks can be legitimately collected and saved in I&R databases (all stakeholders, including owner's status and establishment registration number).
- Alternatively, data collection in the databases could be done with the consent of the users (voluntarily), but that runs the risk of data being incomplete. In such cases the seller would not be able to sell their dogs on a classified site requiring back-end checks, if they do not provide their data to the I&R database.

### **GDPR compliance of the back-end checks:**

- The provision and check of the owner's registered mobile phone number or email address is covered by the consent declaration the seller gives when advertising the animal. In particular, it must be determined who is responsible for the data processing under data protection law and for which purposes and by whom the data may be used.

- The seller consents when advertising the animal as well to information being provided from pet registries to classified ad sites (information about the dog, establishment registration number)
- The publication of the dog's data (microchip number, date of birth, breed, sex, country of registration) is not GDPR-relevant, as the information concerns an animal.
- The publication of the registration number of an establishment is not GDPR-relevant, as this number is already a pseudonym.
- However, when it comes to checking the owner's name and associated personal, non-anonymised data, this would be subject to data protection laws and must be conducted accordingly.

### **GDPR compliance on the classified ad websites (front end):**

- A consent declaration must be ticked by the seller to confirm that they consent to their data being used for the checks, and specific data within the pet registries will be provided for the advertisement. If the seller does not give their consent, they cannot advertise their dog on that classified site.

The most preferable option would be the enactment of a law mandating these checks for online dog sales, as this would entirely legitimate data collection in the I&R databases and the action of checking it.

## 6. Applying the Model Solution in the United Kingdom

### The current situation in the United Kingdom

#### Overview

The United Kingdom (UK) is highly impacted by the illegal puppy trade. The national demand for puppies is higher than the breeding capacity of responsible breeders, and therefore unscrupulous breeders have stepped in to meet this demand. To exclude illegal puppy dealers effectively from the UK online market, the introduction of the FOUR PAWS Model Solution is essential, even as a non-EU member country.

**The UK is one of the key final destinations for puppies caught up in the illegal European puppy trade. In 2017 it was estimated that between 500,000 and 1.5 million dogs enter the UK market annually<sup>6</sup>.**

Due to its illicit nature, it is difficult to quantify the true scale of the illegal trade and how much of it is facilitated by internet sales, such as online classified advertising sites. Some data suggests that approximately 477,500 puppies are unaccounted for in the UK<sup>7</sup> and although it is impossible to put a definitive figure on how many of these puppies are illegally imported, anecdotal evidence suggests a huge increase in the numbers of puppies being brought into the UK for sale, particularly from Eastern Europe<sup>8</sup>, and that the Pet Travel Scheme (PETS) is being used as a cover to illegally import dogs into the UK.

In the UK, dog breeding and trading is currently regulated by both local level governance, national legislation, and international agreements. As of June 2021, the Government introduced the Animal Welfare (Kept Animals) Bill into Parliament in order to improve welfare standards across Great Britain, including new measures to address puppy smuggling such as increasing the age restrictions for imported puppies.

### Identification and Registration (I&R) in the UK

#### Microchipping

Compulsory microchipping legislation came into effect in the UK in 2016 and requires all dog keepers<sup>xi</sup> to have their dogs' microchip implanted by a trained professional, for example a vet, and ensure the details are recorded and updated in a government compliant microchip database. The dog's microchip details must be registered to the dog's keeper including the keeper's name, address, phone number and details about the dog. This information is held securely and, if the dog is later scanned, will only be available to authorised persons which may include veterinarians, dog wardens and rehoming centres.

**There is currently no mandatory requirement for the keeper registering their dog to have their identity confirmed prior to registering the dog in their name.** Some pet registration databases will allow keepers to register the microchip details of their dog over the phone. Some databases allow further updates, such as change of address, to be submitted online, whereas others require change of address details be provided in writing. Before a dog can be registered with a new keeper they will need to be transferred from the breeder/previous owner/keeper. Doing this might involve retrieving a pet transfer code that is provided to the new keeper by the I&R database in order to register the dog under their name as the new owners. In addition to the dog's keeper, local authorities, councils and a number of animal welfare charities can microchip and register a dog. When registering a dog, including one with an international microchip, some databases require the new owner to sign a disclaimer waiving their rights to privacy should the database be required to disclose the keeper's contact details to authorities in the event of animal welfare concerns or fraud. To register a dog, databases require a payment which, if paid via credit or debit card, could enable authorities to trace the person registering the animal.

Compulsory microchipping regulations and GDPR requires that data is only disclosed under certain circumstances to specific user groups, such as to the dog's keeper or to an authorised agent, such as the police, the local authority dog warden, a vet or one of the large national animal welfare organisations.

---

<sup>xi</sup> While the term 'owner' is usually used in this report for ease of understanding, the person who primarily cares for a dog and keeps them in their home is called a 'keeper'; remark from editor.

Approved databases currently include: Animal Microchips, Animal Tracker, Chipworks, Identibase, MicroChip Central, MicroDogID, MyPet, National Veterinary Data Service, Pet Identity UK, Petlog, PetScanner, ProtectedPet, SmartTrace and UK PETtrac. Keepers can be fined up to £500 if their dog is registered on a database that is not on this list. Dogs must wear a collar and tag with their keeper's name and address when in a public place and keepers are responsible for keeping the dog's microchip information up to date. Details must be kept up to date to meet the requirements of the regulations and failure to do so could result in a fine. Dog keepers are not required to provide any verification of their identity prior to updating their details.

Dog breeders must ensure that puppies are microchipped and registered by the time they are eight weeks old and before they are transferred to a new keeper. The breeder must be listed as the first keeper whose details are registered with the microchip number. When a dog is transferred or sold, the new keeper's details must be added to the database and if the keeper's contact details change, these details should also be updated. When a new keeper first registers their dog, they will usually be provided with a pet transfer code from the breeder/previous keeper which is provided by the registration database, in order to register the dog under their new ownership. Not all registries require a pet transfer code, but those that do not will have processes in place to register new owners with checks carried out.

If a dog is stolen, abandoned, or lost, the person who now has the dog may be able to register the dog under their name, depending on the policy of the microchip company. Currently, vets are not obliged to scan or check the microchip when treating a new dog, and subject to their own policy, a microchip company is not obliged to check with or wait for confirmation from the registered keeper before changing the details. This is a significant issue with registration in the UK; if just one organisation, authority or veterinarian fails to scan and check microchip registration or contact the previous keeper, the system is left open to abuse.

There are a number of websites in the UK that enable you to check where a pet is registered by entering the dog's microchip number, such as [www.check-a-chip.co.uk](http://www.check-a-chip.co.uk) (assuming the dog is registered to a UK compliant database). However, no personal information is shared from one database to another, only the registration status of the pet, and in which database more information is held.

Europetnet, as an international membership body, receives certain data from member and associated I&R databases across Europe. Europetnet's primary aim currently is to reunite lost dogs with their owners internationally, however a Europetnet membership could also enable international traceability of the animals. This data provision is a fundamental element of FOUR PAWS' Model Solution.

Only three of the UK's 14 pet registries currently participate in Europetnet: Petlog, Chipworks and ProtectedPet.

### **Breeder licensing**

In the UK, breeders must have a licence to breed three or more litters in a year (or five if they are in Scotland). In England breeders also need a licence if they are breeding dogs and advertising a business of selling dogs and breeders must display their licence number in any adverts they place for puppies, although this is not always enforced by classified ad sites. Anybody found guilty of running a dog breeding establishment without a licence or failing to comply with the conditions of their licence can be subject to prosecution, which can result in a fine, which for example in England is unlimited, and a court order disqualifying a defendant from keeping animals in the future. They may face imprisonment for up to six months, or up to five years for animal cruelty offences under the Animal Welfare Act 2006.

### **Private breeding**

Private persons with surplus pets, operating on a non-commercial level are legally unregulated. There are no specific rules, just general animal welfare law requirements. As there are currently no sufficient checks in place for puppy advertising, it is often unclear whether private people are in fact acting as a business and should therefore be licenced. There are also insufficient checks to detect selling from a third party, i.e. not the breeder, which is unlawful in England.

### **Third party sales ban**

Often referred to as 'Lucy's Law', the third-party sale of puppies for commercial breeders is now banned in England (and Scotland and Wales are scheduled to implement similar legislation in September 2021, with Northern Ireland also considering this). The breeders this would cover are those breeding three or more litters and those that advertise to sell.

Worryingly, the ban in England is being interpreted as not applying to breeders from other countries. This means puppy breeders from outside the UK can currently sell puppies directly to English residents.



For re-sale of legal commercial imports, our current understanding of how it is working in practice is that someone in the UK can have a pet selling licence in place and import puppies for commercial sale. This carries the risk of puppies coming into the UK from poor conditions and possibly spreading diseases, including zoonoses that pose a risk to public health.

#### **Online sale of dogs**

**Online classified ad sites are one of the main conduits to the market for illegal puppy dealers in the UK. Whilst in England the law requires specific information to be included in the advertisement (see details further below), the majority of classified ad sites do not include this and require minimal data from sellers such as the location of the dog and a contact email address, sometimes a telephone number.**

**On the sites we have seen, there is currently no way for the average user nor for the classified ad sites to verify whether the puppy offered online is microchipped and registered to the advertiser, and some sites also do not verify if the advertiser is a licenced breeder or a registered establishment from abroad.**

**For dogs bred in England,** the legislation requires that the following information is displayed when advertising a dog for sale: the number of the licence holder's licence, the local authority that issued the licence, a recognisable photograph of the dog being advertised, and the age of the dog being advertised. In addition to the previous requirements, when imported dogs are being sold in England they require a pet selling licence and the advertisement from a pet seller must also include: the country of residence of the animal from which it is being sold, and the country of origin of the animal. A stronger enforcement framework is needed to ensure online sellers are abiding by these requirements and similar legislation is needed in Scotland and Northern Ireland. The Welsh Regulations are being introduced in October 2021, which will mirror the English regulations.

#### **Pet movement and travel**

Since leaving the EU, British citizens can no longer use a pet passport issued in Great Britain (England, Wales and Scotland) for travel to an EU country or Northern Ireland. Instead, an animal health certificate is required along with proof of rabies vaccination, microchipping and tapeworm treatment. However, citizens can still use a pet passport issued in an EU country or Northern Ireland to bring a pet into the country.

The movement of cats and dogs from the EU<sup>xii</sup> into Great Britain is governed by two regimes: the Balai Directive (92/65/EEC) for what are termed 'commercial movements' and the Pet Travel Regulation (576/2013/EEC) for cats and dogs that are deemed to be pets by virtue of complying with the requirements within that regulation. The Balai Directive also covers the movements of groups of more than five cats or dogs per person travelling; the movement of cats and dogs involving a change of ownership and/or for rehoming (including rescue animals); and pet animals that are not able to fulfil the requirement of the Pet Travel regulation for travelling within five days of their owner or owner's representative<sup>9</sup>.

#### **Entering the UK under the Pet Travel Scheme**

The Pet Travel Scheme (PETS) as laid out in the Pet Travel Regulation, which came into force in 2014, covers the movement of pets with their owners across the EU. The scheme led to an increase in non-commercial movement of companion animals between EU countries as it enabled puppies as young as fifteen weeks to obtain passports and travel to the UK when previously the minimum age of entry was approximately ten months. Fifteen weeks accounts for the 12 weeks minimum a puppy must be to receive the rabies vaccination and the 21 days incubation period. This means younger puppies can now enter the country provided they meet certain requirements, such as a rabies vaccination and to obtain a passport and are therefore more appealing to buy. Adult dogs only need to wait the 21 days after receiving a rabies vaccination for their passport before being able to travel.

PETS currently provides an easy way for those wishing to circumvent the requirements of the Balai Directive by allowing each person to travel with five dogs. Due to the high quantity of dogs that could therefore come in with several people present, this

---

<sup>xii</sup> We only refer to the import of animals between EU member states and the UK in this report.

allowance is often abused by those who actually intend to sell on the animals. PETS also provides very limited traceability of dogs. Official Department for Environment, Food and Rural Affairs (Defra) figures show that the number of dogs entering the UK via PETS increased year on year since the rules around the scheme were relaxed in 2012. Between 2011 and 2013, the number of dogs recorded legally entering the UK under PETS from Lithuania and Hungary increased by 780 per cent and 663 per cent respectively<sup>10</sup>.

Although microchipping and registration are mandatory in the UK, it is not mandatory to register microchips before puppies travel under PETS, permitting puppies to enter the country with little to no form of traceability, should the person who imports the puppies lose or throw away the pet passport. The dogs must be registered on a UK database within 30 days of import. Although the exact number of illegal imports are unknown, the Royal Society for the Prevention of Cruelty to Animals (RSPCA) estimated 30,000 dogs were imported from illegal farms in Romania, Hungary, Poland and Lithuania, and 40,000 from Ireland in 2015<sup>11</sup>.

#### **Entering the UK under the Balai Directive**

The Balai Directive requires commercial dog imports to travel with a TRACES (Trade Control and Expert System) certificate issued by the authorities in the place of origin. Further, the destination country (i.e. the UK) must be notified of the shipment via TRACES. The TRACES database is ultimately managed by the European Commission. The Balai Directive includes: rabies vaccination after 12 weeks of age and a waiting period of 21 days after the vaccination (i.e. be at least 15 weeks of age before fit to travel). Dogs must come from a registered establishment, and must be identified by a microchip, and have a pet passport. However, inconsistencies documented in TRACES suggest discrepancies in the database recording procedures and highlights the system's inability to trace dogs or explain the large discrepancy in the number of dogs estimated to be coming into the UK commercially<sup>12</sup> and the number of dogs recorded.

#### **Post-Brexit movement of pets to and from Great Britain**

The transition period for the UK leaving the EU ended on 1 January 2021 at which point it became a third country for the purpose of PETS and the Balai Directive. In the EU Pet Travel Scheme, there are 3 categorisations of third countries: unlisted, Part 1 listed, and Part 2 listed. The UK was granted Part 2 listed status by the European Commission under the bloc's pet travel scheme, which means that the EU pet passport is not valid anymore when travelling

with a pet from Great Britain to Northern Ireland or to the EU. The dog needs to have a rabies vaccination followed by a 21-day waiting period, a recent tapeworm treatment and a veterinarian needs to issue an animal health certificate (AHC), no more than 10 days before travel to the EU.

The Government plans to continue to press the EU to be granted Part 1 listed status, which would mean the requirements for pet travel for Britons could remain very similar to as they were before 31 December 2020.

**Pets entering Great Britain from the EU from 1 January 2021 need to either have an EU pet passport, or the animal health certificate (AHC) issued in GB used to travel to the EU – which you can use to re-enter GB for up to 4 months after it was issued, or a GB pet health certificate (for travel into GB only). Dogs from Northern Ireland, the Channel Islands and the Isle of Man are exempt.**

Additionally, dogs need to have an approved tapeworm treatment, done no less than 24 hours and no more than five days before entering Great Britain (dogs coming directly from Finland, Republic of Ireland, Northern Ireland (NI), Norway or Malta are exempted). Further, following Northern Ireland's unique position post-Brexit, different rules apply to pet travel between the EU and Northern Ireland than the rest of the UK. It remains to be seen whether more puppies start entering Great Britain from Northern Ireland. However, dogs travelling between EU member states and NI will still need to meet the relevant EU legal requirements.

For commercial imports after Brexit, Veterinary entry documents must be submitted for entry 24 hours before via TRACES (Trade Control and Expert System) for entry or travel through the EU, and via IPAFFS 'Import of Products, Animals, Food and Feed System' for entry to and travel within Great Britain<sup>13</sup>. Animals must be accompanied by a health certificate. By March 2022, imports need to enter at an established point of entry with an appropriate border control post (BCP) so they are available for documentary, identity and physical checks<sup>14</sup>.

## 7. What gaps need to be bridged to reach full traceability in the UK?

Despite the strong public interest and welfare legislation that exists for dogs in the UK, serious animal welfare concerns remain for dogs and puppies, for which there is an increasing demand. Some of these issues would be greatly improved with strengthened traceability. The Model Solution would be an effective way to achieve this.

**The UK has a strong basis for the implementation of the Model Solution as mandatory I&R of dogs is already established and the requirements at national level, including legal regulations required by the UK Government, are well defined. Additionally, one of the UK's leading microchip databases, the Kennel Club's 'Petlog', is already a member of Europetnet, and the database 'Chipworks' is an associate member and shares data with Europetnet as well.**

However, there are several gaps that need to be filled and issues that need to be addressed in order to achieve full traceability of dogs in the UK. In addition to the recommendations made in the international component of this report, below are FOUR PAWS' recommendations for the UK:

### I&R

#### Owners:

- Keepers must ensure their dog is microchipped and accurately registered; many keepers are still failing to update their dogs' microchip records. According to a 2019 report by Battersea Dogs and Cats Home, in Great Britain, 60% of stray dogs implanted with a microchip have inaccurate information on their database record, making keepers hard to trace<sup>15</sup>.
- Rescue/rehoming organisations should ensure that dogs are registered on approved databases prior to rehoming.

#### Enforcement:

- Compulsory microchipping currently faces significant enforcement issues and although legislation around I&R is UK-wide, it is subject to devolved regulations; each devolved government should implement stronger enforcement.
- Legislators should impose tougher penalties on those who are illegally importing puppies.

#### Database operators:

- A system that verifies the identities of those who register animals, from the breeder through to any ownership changes, to have reliable data available in the pet registries and have a system to track a dog's origins.
- Options should be explored around whether there is capability to track the activities of puppy dealers who register their puppies in different I&R databases in the UK to hide the numbers of puppies they breed, or buy from third parties, and sell. This could potentially be done through a network of registries providing authority access to the data in all pet registries in the UK through one access, with different levels of access, e.g. for certain authorities in investigations. They could explore examples such as the German concept of a register network which provides access to several national databases with one common interface within a state (as described in the 'Best Practice' examples chapter).
- Either, the above described network of registers provides the necessary data for the checks to Europetnet, or each I&R database must individually become a member of Europetnet, as is the case e.g. in Ireland. Either way, to allow for international traceability as well as for the online trade registration validation (a regulatory baseline for online trade), the delivery of the necessary data to Europetnet should be a legal requirement of each government approved database in the UK.
- Licenced breeders and sellers should have their status and unique licence number entered into the I&R database, which should be permanently kept along with the dogs' keeper's record and be available for the online checks. To have the dog's data as well as the keeper's information (licenced or not) combined in one database provides efficient means to also control the online trade

and only allow verified registered dogs by identifiable sellers to be advertised online, with automated checks of the pet's identity, its registration to the seller, and the seller's licensing, as suggested in the FOUR PAWS Model Solution.

#### **Veterinarians:**

- Ensure all vets scan dogs at first (or annual) appointments or upon registration at the practice. Vets should check if the dog is already registered to an owner, and if the registered owner matches with the person presenting the dog.
- When registering a dog, vets should verify the owner and ensure details are current.
- If details are not correct, they must tell the keeper that they will need to inform the local authority. This should be implemented across the industry as Standard Practice.
- Vets should also ensure they scan microchips prior to euthanising a healthy/treatable animal.

#### **Legislators:**

- Much puppy selling occurs under a breeders licence; however, it may happen under a pet selling licence if either a) the breeding happened outside of the country, or b) the breeder did not breed more than three litters or advertise to sell but is still deemed to be operating as a business (although this may be difficult to prove if they are not advertising to sell). Ideally, anyone who breeds and sells puppies (also including people whose dog has an 'accidental litter') needs to obtain a breeder licence from the first puppy sold onwards. There might otherwise be a loophole created where commercially operating breeders pose as private breeders. In any case a voluntary licensing at lower numbers should not be prevented by the authorities. Licensing as a breeder would also disable partaking in third-party selling and remove the possibility of imported sales (dogs are currently allowed to be imported from overseas where they might be bred in conditions far worse than those permitted in the UK and pose a disease transmission risk).
- Any breeders, regardless of whether a professional licenced breeder or someone privately selling a surplus litter of puppies, are legally required to register the puppies and themselves as the puppies' first owners in a pet registry. Any breaches of this duty should incur a significant fine.

- Clearly identify licenced breeders in the pet registries. This could be done by requiring any UK breeding licence number is included along with the dogs' records in the pet registries, similarly to measures taken in Victoria, Australia from June 2019<sup>46</sup>. This would make it much easier to find out which puppies are bred from a licenced breeder and which ones by privates. It will also make it easier to ascertain licenced breeding operations are being traded lawfully if all breeders are required to enter their details and there is evidence of significant numbers of dogs under their name. Pet registries should also include the establishment registration numbers for imported puppies, as required with the EU Animal Health Law for commercially imported animals.
- Under the Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018, local authorities in England are required to appoint one or more suitably qualified inspectors to inspect dog breeding premises that require licensing under the regulations. Local authorities appoint such inspectors using powers under section 51 of the Animal Welfare Act 2006. FOUR PAWS recommends this for the whole of the UK.

#### **Online classified ads**

##### **Classified ad sites**

- The enforcement regime should include a full check of the advertised dog's registration and their sellers' licences. As described in this report, the check must be carried out before an advert can go live. The publication of the microchip number, the seller's licence number as well as information on the breeding establishment for imported dogs (discussed in detail above) in the advertisement will provide consumers with valuable information and assist with the traceability of the dog and seller.
- For the microchip registration validation, a solid backend check is crucial, verifying the dogs' registration to a traceable person. The traceability of this person also requires a reliable identity check at the first point a person registers a dog or a change of keeper takes place.
- All UK based classified ad sites providing a platform for the sale of puppies and dogs should implement the application programming interface (automated check of a dog's details against pet registration data) developed by Europetnet and endorsed by FOUR PAWS as part of our Model Solution.



- Display of breeder licensing details on all ads: as of March 2020, the Scottish government proposed new licensing legislation to regulate dog breeding and pet sellers which will require any licence holder advertising an animal for sale, be it their own business website or an ad site, to clearly display their name, licence number and the name of the licensing authority on any such website. The same is already required in England. FOUR PAWS recommends this for the whole of the UK, including a validation of this information, as provided by Europetnet's PetSAFE.
- Validation of the advertised dog's microchip registration to the seller, and validation of sellers' licences before ads can go live. The microchip number, mobile phone number as well as the licence number should be published on the ad and cannot be changed after the validation by the advertiser.
- Classifieds should only allow the advertisement of puppies which are registered in the UK to avoid sellers from abroad advertising their puppies directly in the UK.
- It is recommended that classified ad sites implement seller identity verification for animal sales in general, additionally to the registration checks of companion animals, in order to have better controls for sellers of other species which cannot be chipped and registered.
- The Animal Welfare (Licensing of Activities Involving Animals<sup>17</sup>) (England) Regulations 2018 states in Schedule 3, Specific conditions: selling animals as pets, Records and advertisements, that any advertisement for the sale of an animal must –
  - (a) include the number of the licence holder's licence,
  - (b) specify the local authority that issued the licence,
  - (c) include a recognisable photograph of the animal being advertised,
  - (d) display the age of the animal being advertised,
  - (e) state the country of residence of the animal from which it is being sold, and
  - (f) state the country of origin of the animal.

Stronger enforcement of these regulations and an automated validation system, such as EUROPETNET's PetSAFE, is required to prevent abuse of online pet sales.

## Recommendations beyond the 'Model Solution'

### Cross-border movement

- PETS could be improved by only allowing the entry of companion animals which are registered already in a database which is connected to Europetnet.
- PETS could be improved by allowing fewer dogs (three) to travel and by monitoring the entry and exit of owners and their dogs, requiring registration of microchips (with the importers name as an interim owner) and by raising the age at which dogs can travel.
- A mandatory registration of the animal's microchip in the country of origin should be requested for commercially imported puppies too. (In order to obtain a pet passport only the microchipping of the pet is required, but not its registration in a pet registry). Additionally the age by which puppies can be imported should be raised.
- The way the law is being interpreted is that someone in the UK can have a pet selling licence in place and import for commercial sale. It should be monitored if this undermines the intentions of third-party sales bans, if imports increase, and it should be considered to raise the minimum age of puppies for commercial import, to make this business less attractive.
- Close the loophole currently allowing imported puppies to be sold via third party dealers to UK buyers.
- If third party sales with imported puppies cannot be banned, any puppy should have to be registered in a UK pet registry on the importer before they are sold on. Violators need to receive significant fines to deter informal sales.
- Northern Ireland, Scotland and Wales should also implement the third-party sales ban, in effort to avoid being used as the UK's import point for puppies from abroad.
- The enforcement of the legislation on commercial pet movement is largely the responsibility of Defra/APHA – with vets doing checks in border inspections. Cases of illegal imports demonstrate that not enough resources are available to carry out the checks required, thus FOUR PAWS calls upon increasing the resources at border inspection points, in order to identify illegal activities and animal welfare or health issues.

- FOUR PAWS calls to identify means to better and closely monitor whether puppies entering Great Britain from Northern Ireland increases following Ireland's unique position post-Brexit. Currently, there is no data available on movement of dogs between Northern Ireland and GB as such dogs do not require any notification or health certification<sup>18</sup>.

## 8. Next steps

FOUR PAWS believes the best next step is to create a pioneer industry project with volunteer databases and classified ad sites, to demonstrate that this system is achievable. This would provide the basis for drafting new legislation that only allows the sale of microchipped and registered dogs online, which will also reward the participating pioneering classified ad sites with competitive advantages.

From 2020 FOUR PAWS and Europetnet partnered to develop and deliver a pilot of Europetnet's PetSAFE. The tool is anticipated to be available in mid-2021. A description of the tool is provided in the annex.

FOUR PAWS recommends that the back-end checks begin with checking the microchip number and validating ownership in the project's first stage, followed by a basic set of details on the dog.

At a later stage, when the AHL's establishment registration numbers are available in the pet registries, FOUR PAWS recommends adding the establishment registration numbers, and potentially more details on the owners, to the checks. This will provide the classified ad sites with opportunities to differentiate between private and commercial sellers and allow them to potentially limit dog sales by private persons, as often dealers will pose as private sellers to sell illegally imported puppies. For this limitation of private sales, the Austrian law could serve as an example, which allows private persons to sell microchipped and registered dogs only above a certain age, therefore preventing illegal puppy dealers from posing as private sellers as they will no longer be able to advertise puppies.

## 9. Conclusion

This report has outlined the necessary measures for the successful implementation of the Model Solution to enable full traceability of dogs across Europe and bring an end to the illegal puppy trade. Eliminating the illegal puppy trade may seem like an ambitious task, but we are certain this is achievable. Several parts of our solution are already in place in many European countries, and similar ideas from various stakeholders across the world indicate that this is feasible. With the full implementation of mandatory I&R across the rest of Europe, and with the willingness and cooperation of all relevant stakeholders, we can create a smart, comprehensive and sustainable solution that enables full traceability of dogs, as well as meaningful regulation to address the illegal puppy trade, on a lasting, European-wide basis.

Should an international entity such as Europetnet decide to create the international interface that can be utilised to conduct the back-end checks between I&R databases and classified ad sites across the whole of Europe, we will be even closer to achieving our goal.

Ultimately, this solution will benefit not only classified ad sites, national governments, responsible breeders and consumers, but it will also be a critical step in improving disease prevention and protecting both animal and public health. Together we can 'trace the trade' and bring accountability to the forefront, improving the welfare of millions of dogs and puppies across Europe.

# 10. Appendix

## 10.1 Expert and supporter statements

(Additional statements of support are published on [www.four-paws.org/tracingthetrade](http://www.four-paws.org/tracingthetrade))

WSAVA supports calls to regulate the online trade of dogs and cats to improve companion animal welfare. The mandatory identification and registration of animals and linking them with online selling platforms is critical for international traceability, as well as regulatory

and legal compliance. WSAVA backs the initiative by FOUR PAWS to ensure full traceability by collaborating with our global veterinary community to educate and support veterinary practitioners and the public on this issue.

**World Small Animal Veterinary Association (WSAVA)**

After exploratory talks, the Board of Europetnet wishes to express its support for the aims and approach of the FOUR PAWS Model Solution. We believe that cooperation between online advertisement platforms and Identification and Registration Databases through the integration of their respective processes will not only ensure tighter regulation of the online trade in dogs, but will also enable traceability of those involved and ultimately go a long way to eradicate the illegal puppy trade.

Several members of Europetnet have expressed interest in their databases participating in pilot projects, once suitable and willing members of the classified advertisement industry are found, and once funding for the required IT development to underpin the service is secured. Contingent on the success of such pilot projects, Europetnet will strongly support, and advocate for, the rolling out of this IT solution across Europe with Europetnet taking a leading role in the provision of the service.

**Michel Schoffeniels, President of Europetnet**

Eurogroup for Animals is the only pan-European umbrella organisation for animal welfare. We channel the national influence of each of our 66 members into a powerful voice, creating opportunities for a change across Europe that cannot be achieved individually. Our aim is to improve animal welfare as quickly as possible by working together with

the EU institutions to deliver better legislation and enforcement. Eurogroup for Animals has contributed to FOUR PAWS' Model Solution Report, and will encourage the implementation of the outlined ideas by bringing such effective and efficient solutions to policy makers and key stakeholders at the EU level.

**Reineke Hameleers, Director of Eurogroup for Animals, Belgium**

■ ■ Providing a quality classified ad site by ensuring maximum security for our users is one of the priorities of anibis.ch. For years, we have been convinced that simply deleting the category 'animals' is not a solution and that is the reason why we are conducting discussions with animal welfare associations in order to put in place effective measures to curb the illegal puppy trade.

Since 2016, the microchip number must be provided to anibis.ch, in order to publish an advertisement for a dog, and since March 2018 that has also been the case for purebred cats. We manually check each microchip number

on Europetnet.org. In Switzerland, the new Animal Protection Ordinance, which came into force on 01.03.2018, requires that the seller's full name and full address have to be published in the classified ad. Unfortunately, these efforts are in vain because it is impossible for us to verify if the information indicated is correct. With the introduction of automatic checks of the correctness of the data – in order to advertise dogs – we would be able to further complicate the illegal trade of puppies. anibis.ch supports the FOUR PAWS' proposal and is gladly offering its help as a test platform. ■ ■

**Jelena Moncilli, Anti-Fraud Specialist *anibis.ch*, Switzerland**

■ ■ We are very excited about the proposed Model Solution set out by Four Paws. By adding additional layers of externally verified information to the process of buying & selling dogs online we believe that the end consumer

and their pets will benefit enormously. Dogs.ie is committed to supporting such a system and integrating the solution directly into our platform. ■ ■

**Paul Savage, CEO *dogs.ie*, September 2020**

■ ■ Both 'Chipworks' in the UK, and 'Fido' in Ireland are interested in participating in a online trade registration validation and check system. In the case of both registries we are ready to integrate official breeder registration / licence

numbers within the current data file structure and we have developed IT systems that allow for information checks to validate online advertisements. ■ ■

**Finbarr Heslin, Director of Fido (Irish-government licenced I&R database) and Director of Chipworks (UK-government approved I&R database), UK**



Animal welfare and the quality of our advertisements in the animal market have been the highest priority for us for years: we have already introduced a number of measures, some pointing the way, and we are not tired of pushing ahead vigorously with the fight against the illegal puppy trade. The logical consequence can therefore only be to follow FOUR PAWS' idea of complete traceability in the online puppy trade and to actively participate in shaping it. Together,

with our alliance partner VDH, the Verband für das Deutsche Hundewesen, we will therefore implement the Model Solution and thus form a strong alliance: as a market leader in serious online pet transfers and as part of a national media group, we also see the obligation to promote this topic socio-politically, and to establish the Model Solution of FOUR PAWS as a perspective standard, and to persuade the politicians to support us consistently in our efforts against illegal activities. ■ ■

**Daniel D'Amico, Chief executive at *deine-tierwelt.de*, German**

ANIMALDATA.COM welcomes the FOUR PAWS initiative against the illegal puppy trade which requires all breeders and pet traders to be registered. In order to be able to trace each animal, a breeders or traders registration

number would need to be recorded in both state and I & R databases prior to any transfer of a puppy. ANIMALDATA.COM is ready to implement the related requirements of EUROPETNET in Austria. ■ ■

**Dr. Herbert Mueller, Internationale Tierkennzeichendatenbank *ANIMALDATA.COM*, Austria  
[International animal identification database]**

The edogs website, which specialises in the online trade in dogs, is proud to announce its collaboration with FOUR PAWS. The online platform, which has been in operation since December 1st 2017, has a key focus on providing safety in the online dog market.

During a time of illegal puppy traders, and so-called 'trunk puppies', it is important for edogs to be able to offer a trustworthy platform.

FOUR PAWS is committed to establishing full traceability in the online puppy trade, so the edogs team sat down with them to develop this collaboration. Through the FOUR PAWS Model Solution, edogs has learned how it is possible to stop the illegal puppy trade. The team from edogs is happy to support this project to make the dog trade safer. ■ ■

**Liselotte Laffree, *edogs.de*, Germany**

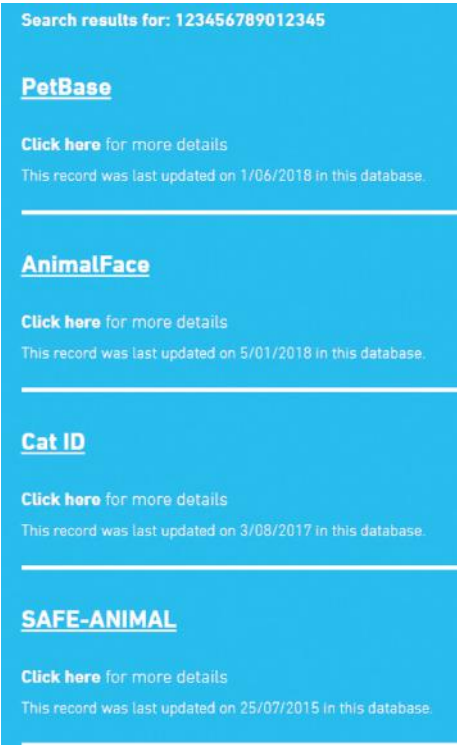
## 10.2 Best practice examples: components of the Model Solution already in action

The Model Solution is an entirely practical approach, with many of the steps outlined already being taken by I&R databases, classified ad sites, and national policymakers in various European countries.

These best practice examples of the different components of the Model Solution give great credence to its feasibility and can be used as valuable blueprints for the implementation of the Model Solution. Please note that this is not an exhaustive list, and if your country has other successful stories we would like to hear about them; please send your information to FOUR PAWS using the contact details at the beginning of this report.

### Europetnet: an established entity centralising information in European I&R databases

Europetnet is a well-established and respected international membership body that receives certain data from member and associated I&R databases across Europe. It covers a wide range of countries' I&R databases. Europetnet's primary aim currently is to reunite lost dogs with their owners internationally. Beyond this, its public search function<sup>19</sup> shows the databases wherein the animal's transponder was ever registered at, listed chronologically.



Search results for: 123456789012345

**PetBase**

[Click here](#) for more details  
This record was last updated on 1/06/2018 in this database.

**AnimalFace**

[Click here](#) for more details  
This record was last updated on 5/01/2018 in this database.

**Cat ID**

[Click here](#) for more details  
This record was last updated on 3/08/2017 in this database.

**SAFE-ANIMAL**

[Click here](#) for more details  
This record was last updated on 25/07/2015 in this database.

[www.europetnet.com](http://www.europetnet.com)

### Pioneers for the Model Solution: Switzerland and Ireland

Switzerland was the first country with a classified ad site, anibis.ch, aiming to work with FOUR PAWS to implement the Model Solution and establish the checks as recommended. Full implementation is dependent on Europetnet setting up the required interface and on Swiss database, Amicus, delivering the required data. Implementation is scheduled to be completed by the end of 2021.

Ireland, with classified ad site dogs.ie, will implement a national version of Europetnet's PetSAFE in 2021 which will be integrated into the international version.

### Pioneers in legislating the online dog trade: Ireland and Austria

Ireland: Anyone selling more than five pets a year must be registered in "the Register of Sellers and Suppliers of Pet Animals" of the Ministry for Agriculture, Food and the Marine, and will receive a unique registration number. When advertising a dog for sale or supply, sellers need to include in the ad the registration number of the seller (if Regulation applies) and the unique code of the microchip implanted into the dog, along with age and country of origin of the animal. Dog breeding establishments and charitable organizations also need to publish their registration numbers<sup>20</sup>.

Austria: Austria already requires mandatory I&R for dogs. Austria is one step ahead of most other European countries in terms of breeder and seller registration in connection with online sales: their current Animal Welfare Act dictates that only breeders or dealers who are registered at the relevant district administration authority may sell dogs and cats online. Private persons can advertise individual animals online when the animals have reached a minimum age of six months – or for dogs and cats when their canine teeth are already grown. Dogs additionally have to be registered for at least 16 weeks in the I&R database. This law still allows private persons to find a new home for their pet if it needs to be rehomed.

Furthermore, there is a law that states that anyone who breeds and sells animals requires a permit. The name and address, telephone number, breed and number of animals kept and the place of keeping must be reported to the authority before activity can begin. Within six months of notification, the establishment must be inspected to ensure adequate animal husbandry for breeding or sale is being practised.

These mandates form a solid legal base for implementing the back-end checks for classified sites as suggested in the Model Solution – but the checks would need to be made mandatory.

### **Approving I&R databases, managing ownership changes and linking to Europetnet: Ireland**

A successful example of designating competent authorities to approve private or government-operated I&R databases is Ireland's Microchipping Dog Regulation 2015 (MODR 2015<sup>21</sup>), which dictates that approved databases must be full members of Europetnet. Under this framework, it is guaranteed that databases will fulfil a minimum standard set by Europetnet's own Statutes and Set of Rules<sup>22</sup>, which every member must meet to become a member.

Regarding the sale and acquisition of dogs, Ireland has particularly thorough legalisation in place. Upon registration, a dog keeper is provided with a certificate of registration. When a person intends to sell a dog, they need to ensure the person acquiring the dog has produced for inspection an accepted form of identification and a recent utility bill giving the person's address. They also need to endorse the name and address of the person acquiring the dog on a legible copy of a certificate of registration relating to the dog, and give the endorsed certificate of registration to the person acquiring the dog. The seller must notify the I&R database of the name, address and contact details of the person acquiring the dog, and the I&R database must record the information.

The person acquiring the dog needs to give all necessary information to the I&R database such as name, address and contact details. They also must provide the certificate of registration with a copy of the accepted form of identification and utility bill to the I&R database.

The I&R database records this information and issues an updated certificate of ownership to the person acquiring the dog.

### **Pioneering classified ad site back-end checks: Fido I&R database, Ireland ('Irish System')**

The Irish I&R database Fido has already developed a similar system to the one presented in this report. The Irish Regulations on I&R require that the owner of a puppy is independently identified by an authorised professional, and that their photo identity and proof of address is verified. In the case of the Fido database, registered information is then sent to the registered owner of the puppy in the form of a certificate, which shows compliance with MODR 2015 in accordance with Regulation 6.

The Fido database generates several corroborative mechanisms at the time of registration that are reflected on the certificate: a PIN, barcode and QR code. In the event of an online sale, the advertiser enters the microchip number and PIN from their certificate into the classified ad site, whereupon the information is verified via an API (interface) with Fido. The PIN is only known to the owner and to the Fido database, thus it can be used as a 'secret' checking element, which can add security and provide a lead to the owner. The check of the PIN could replace the delivery of an owner's name and address details in case these cannot be disclosed due to GDPR reasons. Without a valid certificate the seller will not be able to complete the required fields. Please find the full description by Finbarr Heslin (CEO of Fido), in the annex of this report. The Irish system greatly influenced the development of Europetnet's PetSAFE, and the national pioneer project will be integrated into PetSAFE in 2021.

### **Access to several national databases with one common interface: Germany**

In Germany there is still no national I&R legislation for dogs and cats. Instead, with 16 different regulations concerning the identification and registration of dogs and cats, it has a heterogeneous system of different private and public pet databases. Against this background, the Network I&R, a high-level consortium of animal welfare officers, veterinarians, the largest companion animal database in Germany, technical experts, and animal welfare organisations, has developed a solution model based on connecting existing companion animal databases which would save the costs involved in the establishment and operation of a new general database. The developed model provides for a network of the existing companion animal databases (public and private), which are connected through a digital interface, the so-called companion animal query service (HABS, in German "Heimtier-Abfrage-Service"). The query service HABS enables access to all databases belonging to the network, providing one single point of contact with different levels of access for private persons (vets, shelters, owners etc.) and public administration (police, public vets, prosecutors, communities etc.) complying with data protection requirements (GDPR). Pilot projects will be implemented within 2021. If successful, the concept could serve as a national model for other EU Member States with diverse databases. These countries could use the HABS for interconnecting their databases and thereby creating one point of contact for a third party, such as e.g. Europetnet. This would allow harmonisation of I&R at the Member

State level, so that EU-wide I&R could be introduced under simpler conditions.

Find more about the model (in German) at [www.heimtierversorgung.net](http://www.heimtierversorgung.net)

### **Centralisation and digitalisation of breeder and seller registers: Bulgaria**

The Bulgarian I&R database VetIS, which holds information on the listed breeders and companies (e.g. transponder companies), is accessible to authorities and vets. VetIS is the only I&R system in Bulgaria. It is centralised and digitalised and covers the I&R of dogs as well as the breeders, all in the same database. In Bulgaria there are public registers that are created on the basis of information existing in VetIS, e.g. public registers of transponder companies and breeders. The competent authority is obliged to periodically update the registers.

### **Bulgaria and Switzerland: trailblazing traceability and accessibility in databases**

Bulgarian and Swiss I&R databases are leading the way in maximising traceability and covering many of the requirements for the Model Solution:

#### **Bulgaria, state database VetIS**

Bulgaria already requires mandatory I&R for dogs. Their state database VetIS is the only I&R database in Bulgaria and holds detailed information about dogs. The information entered for dogs includes: microchip number and date of issue, passport number and date of issue, microchipping and registering vets, date and place of birth, sex, rabies vaccinations, date of neutering, breed, different owners and their address details. The vet registers both owner and animal, and the entire life of the animal can be tracked including all involved stakeholders. It is possible to extract information on single stakeholders, e.g. to see which pets a vet has registered. The Bulgarian Food Safety Agency (BFSA) validates the transponders (microchip numbers) that the vets purchased and registered in the system. Breeders have to register their puppies at birth, keep a registry of buyers when selling puppies and the new owners must register their ownership with a vet within seven days. The general public has no access to the database and can only see the registers for registered shelters.

#### **Switzerland, national database Amicus**

In Switzerland I&R for dogs is mandatory. The Swiss I&R database Amicus is a private-public partnership between Identitas AG and the Swiss cantons (districts). It has a comprehensive system of different access levels for different authorities (with an access level matrix) and allows authorised persons to access data from the I&R database.

Local authorities register pet owners with their full name and address and are responsible for address updates. Dogs must be registered before they are three months old or before their first sale, whichever is sooner. All microchip numbers are pre-registered (prior to being used for implantation into animals) by the vendors of microchips, and allocated to approved veterinarians, who are the only people authorised to inject and register these pre-registered transponders and microchip numbers. The dog's registration is done either by the vet who chips the puppy, or – if the dog is imported from abroad – the vet who first examines the dog in Switzerland. The vet must pay a registration fee which he invoices to the dog owner. The following data is captured on the dog: breed, date of birth, sex, microchip number, date of registration. The vet also enters the dog's passport number.

Vets can see all data of all chipped animals, while registered keepers can access the data relating to their own living and deceased animals. Any change of keeping must be reported to Amicus by the keepers themselves, so that a full history of owners (since registration) is maintained for every dog.

What is missing from this system are vaccination details, and the history of imported dogs before entry to Switzerland. There is also no indication of status as to whether a person is a breeder or a private seller.

### **Adding Breeder Source Numbers to I&R databases: Victoria, Australia**

In 2019, the state government of Victoria in Australia enacted an amendment to regulation 12 of the Domestic Animals Regulations 2015 to increase traceability and clearly link dogs and cats to their breeders. This includes adding a new requirement that the record associated with microchips of dogs or cats also include a 'breeder source number'. Furthermore anyone advertising a puppy, kitten, dog or cat for sale or to give away must display the source number from a Pet Exchange Register. The source number will also be required when implanting a new microchip<sup>23</sup>.

The Pet Exchange Register was developed in order to improve traceability 'and makes it easier for prospective buyers to know that their pet has come from a valid source'<sup>24</sup>.

## 10.3 Description of Europetnet's PetSAFE

### Background

Many online classified sites advertise pets. It is important to provide a mechanism that enables such marketplaces and other stakeholders to ensure that the ads are uploaded by the pet's registered owner/keeper\*, as outlined in the pet registry. The PetSAFE system will deliver a backend technical solution that will enable such verification.

The main objectives will thus be:

- Verify ownership information using the Microchip number.
- Verify pet details using the microchip number (country of registration, breed, species, age, breeder registration number and other information as may be provided by the national database).

The establishment of legal ownership is done through a Multifactor Authentication system (MFA) using SMS and/or email as the authentication system while also verifying the validity against national databases.

Through the PetSAFE system, Europetnet will provide a framework that delivers the following:

- Determine which database has the latest details pertaining to the chip.
- Act as a gateway to the database to retrieve information.
- Trigger the Multifactor authorization methodology.
- Provide a time limited validation link for a specific pet allowing the posting of a validated advert.

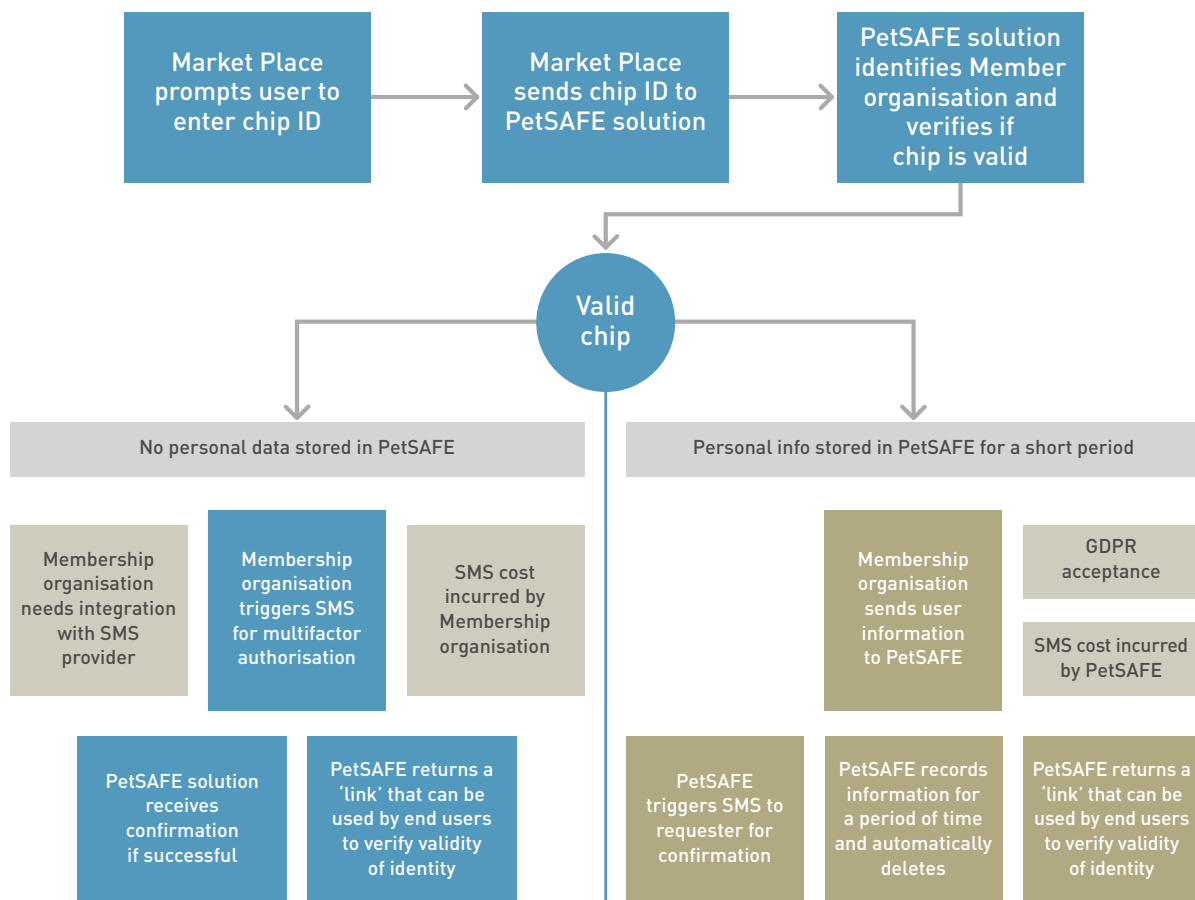
### Stakeholders

The stakeholders that play a role in the PetSAFE solution include:

- Online classified ad platforms
- National Databases
- Europetnet
- FOUR PAWS International

### Context diagram

The presentation below provides a high-level presentation of data flow / application of the PetSAFE system.



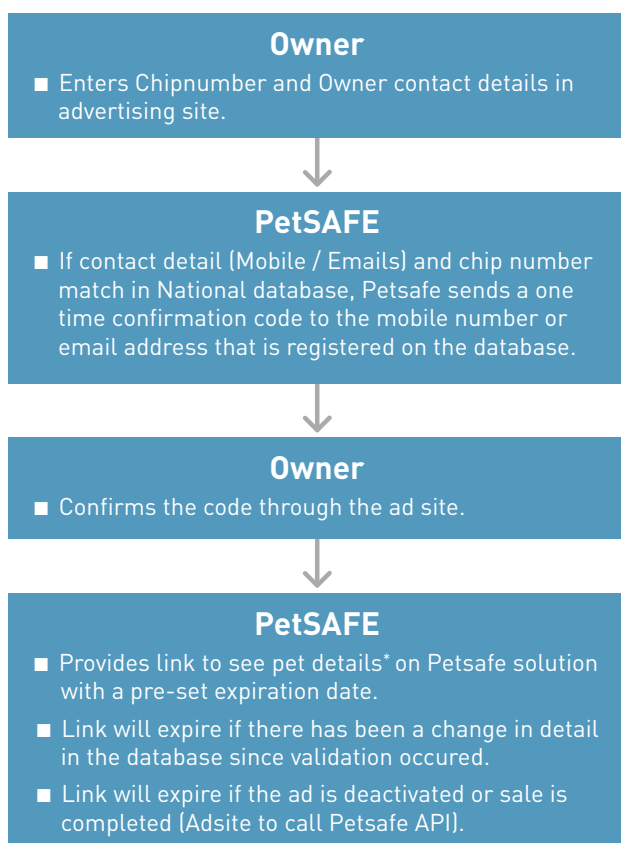
\* In many countries animals are 'kept' rather than 'owned' but for the sake of simplicity in this text we keep the term 'owned'.



## Requirements to use PetSAFE system

1. Approved / participating I&R databases.
2. Approved / participating online classified advertising websites.
3. Pet owners who have microchipped pets registered in their national database, with contact information (mobile phone and / or email address).
4. GDPR Approval is implemented by the ad site and national database.

## Flow



## Integration Solution

The PetSAFE system will include the following elements. Some of the API elements could be replaced by other technologies including Javascript.

### Configuration

1. A separate API key and password would be provided which should be passed with the request.
2. Classified ad sites can select a number of days that the verification should be valid. This could also be a policy setting at member organization level.

3. SMS/Mail through PetSAFE or by member organization (Ideally via sent through PetSAFE).
4. Link for GDPR, where relevant.

### Transactions

1. An API skeleton as a standard for member organizations to customize and implement an API which will take a CHIP ID as parameter and return Yes / No depending upon whether the CHIP exists in their database with Owner contact details. (The API will also check if it is a whitelisted entry, when registries work with whitelists for PetSAFE).
2. GDPR related concern, at a national database level, should be handled at Member organization's side while returning Yes / No. (All terms of the PetSAFE system are consented to by the advertiser on the OAP. Failure to consent to these terms will result in the advert not being advertised. Wording for consent to the use of these terms and conditions can be provided by PetSAFE).
3. An API Skeleton that the member organizations will customize and implement to return the owner and pet details.
4. An API that will send an OTP (One-time code) through SMS / Email.
5. An API that will authenticate the OTP and then return the Owner and pet details that can be provided to the end user to implement the same in the online advertising platform.
6. Store a link that will be active for a period of time based on configuration settings.

## Information security & GDPR considerations

1. Ad site and national databases must follow implementation methods that will be provided as part of the final implementation documentation.
2. Ad site and databases must ensure GDPR requirements are adhered to through proper permissions.

## OTP through SMS

1. OTP through SMS and/or email can be provided by Europetnet.

This specification forms the basis for the development and implementation of PetSAFE.

\* PetSAFE will verify for the classified ad site that the link is correct and once it is, then the classified ad site knows the ad is safe to publish. Other data may be available to the classified ad site and viewers of the ad at some point in future iterations of PetSAFE: with the consent of the databases and the owner, prefilling of other fields such as age, colour, sex, breed etc and then be pulled from the database via PetSAFE and into the classified ad site.

# 10.4 EU Member States without mandatory identification and registration of dogs



Countries with mandatory I&R

Countries without I&R

\*Switzerland and the UK are not part of the EU but have mandatory I&R for dogs  
\*\*Mandatory from 2023

## 10.5 A check of Microchip and Pin: the 'Irish Model'

Published with the kind permission of Finbarr Heslin, Fido.

### Can the Microchipping of Dogs Regulations (2015) help to improve traceability and transparency and make online advertisers more responsible and more accountable?

Prepared by Finbarr Heslin. 3rd February 2019.

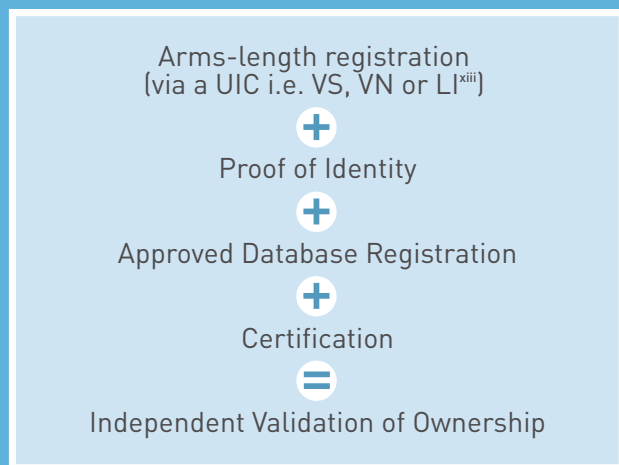
Unlike any other jurisdiction in Europe, the Irish Regulations on I&R, MODR 2015, gives us the following corroborating elements;

1. The owner of a pup is independently identified by a Vet Surgeon, Vet Nurse or approved Lay Implanter and the documentation to prove their photo identity and their current address has been seen by the certifying registrar.
2. This data generated under MODR 2015 now links the chip number to an independently-verified individual, whose home address is known and verified, and whose contact details are also known and verified.
3. This data, when registered correctly by the approved I&R personnel, now resides in a Government-approved independent repository and could be made available to individuals in certain circumstances in line with GDPR and signed consent agreements.
4. In the case of the Fido Database, this registered information is then sent to the registered owner of the pup in the form of a certificate issued after registration, which shows compliance with MODR 2015 in accordance with Regulation 6.



The image shows a 'DOG MICROCHIPPING CERTIFICATE' form from Fido.ie. At the top is the Fido logo and the title 'DOG MICROCHIPPING CERTIFICATE'. Below this is a disclaimer: 'Issued in accordance with Section 6(1) of the Microchipping of Dogs Regulations 2015. The details as set out on this certificate are those of the current owner of this dog as stored by Fido.' The form is divided into several sections: 'Issuing Authority' (Fido.ie logo), 'Microchip Number' (with a PIN field), and a QR code. Below these are three main sections: 'Pet Details' (Dog Name, Date of Birth, Breed, Colour, Markings stamp, Gender), 'Implanter Details' (Date of Implantation, U.I.C. of Implanter, U.I.C. of Registrar), and 'Owner Details' (Registered Owner). There is also a section for 'Address where normally kept:'. A horizontal line with 'DETACH HERE' is followed by a barcode. Below this is another 'Owner Details' section with fields for Name, Address, Telephone Number, Mobile Number, and Email Address. At the bottom, there are fields for 'Microchip Number' and 'PIN', a disclaimer: 'It is very important to check that the details on this certificate are correct. It is your responsibility to keep your contact details up to date and inform Fido of any changes to them.', and another barcode.

As a result of this circular flow of information, there is a very specific corroboration that can be facilitated by the database.



### Independent Validation of Ownership

We now have all the required pieces for Independent Validation of Ownership, the Independent Storage of Details of Provenance and the ability to have an Independent Detection of Fraud in the following cases;

- no chip
- not registered
- bogus registration
- not certified

5. The Fido Database generates several corroborative mechanisms at the time of registration that are then reflected on the Certificate. Primarily these are the PIN, the Bar Code and the QR Code.

**- SAMPLE -**

## DOG MICROCHIPPING CERTIFICATE

Issued in accordance with Section 6(1) of the Microchipping of Dogs Regulations 2015.  
The details as set out on this certificate are those of the current owner of this dog as stored by Fido.

Issuing Authority: **fido.ie** Microchip Number: **112233445512345** PIN: **5195** Use this PIN to verify this cert

This is not a complete dog microchipping certificate unless the lower portion is still connected to the upper portion.  
The lower portion may be detached by the current owner to facilitate a change of ownership and the issuance of a new certificate.

Pet Details		Implanter Details	
Dog Name:	Babbage	Date of Implantation:	03/04/2012
Date of Birth:	01/02/1999	U.I.C. of Implanter:	xx12345678yy
Breed:	Labrador	U.I.C. of Registrar:	uu87654321vv
Colour:	Golden yellow		
Markings (if any):	White tail		
Gender:	female		

Address where normally kept:

**Owner Details**  
Registered Owner: **Peter James**

To view details associated with this registered dog you may visit [www.fido.ie](http://www.fido.ie), where you will be asked to enter the microchip number and the correct PIN (printed above).

**DETACH HERE**

Owner Details:	
Name	Peter James
Address	123 Main House Some District Any Town Somewhere ABC123
Telephone Number	+555 (0) 1234 2468 +55 (0) 11 2233 456
Email Address	pj@example.com

Microchip Number: **112233445512345** PIN: **47795** Use this PIN to log in and edit details. Do NOT give this PIN to others.

It is very important to check that the details on this certificate are correct.  
It is your responsibility to keep your contact details up to date and inform Fido of any changes to them.

6. If the owner of the pup wishes to then advertise the pup for sale and the advertising platform wanted to know the bonafides of the advert, the advertiser would enter the CHIP and PIN number from their cert into the Online Advertising Platform (OAP). Immediately this data would be checked via an API with Fido which can instantly verify that the certificate is legitimate. This means that the advertiser's name, address and contact details are known to Fido and that their details (photo ID and address) have been independently verified by the VI, VN or LI<sup>xiii</sup>.
7. This means that if a pup is correctly registered in accordance with MODR 2015, it would automatically be able to be advertised. If it isn't the request to advertise would be quarantined.
8. In order for the online platform to provide this instant verification, they have to have one chip

<sup>xiii</sup> A UIC is a Vet Surgeon, Vet Nurse or approved Lay Implanter; remark from editors.

and pin for every pup they offer for sale, thus ensuring that the numbers of pups being sold is a real reflection of the reported situation. This prevents a breeder from advertising one pup for sale but selling 'this pup' multiple times, hiding the actual number of pups offered.

9. The API between the Online Advertising Platform and Fido can be refined according to demand and agreement between the OAP and the Database. It can be used to;
  - a. prevent repeat sales of a specific chip (which has a high correlation to fraud and multiple selling of dogs on one chip number);
  - b. to ensure that the age profile of the advertised dog is the same as that which is reflected on the cert;
  - c. fill the breed, sex, age and colour fields of the advertisement instantly; and
  - d. fill in the contact details for the owner of the pup on the advertisement instantly.
10. Furthermore, Fido has developed the capacity for the advertiser to allow any prospective buyer

of the pup to view a virtual copy of the certificate to show the legitimacy of the registration. This would obviously be with the advertiser's full consent and is in a time-limited fashion.

11. API platforms deliver almost instantaneous responses to verify the veracity of the advertiser's claims about the pup being offered for sale or supply. There is no technological barrier to implementing this system in the morning. It just requires the Online Platform adopting this approach.
12. Any GDPR, Data Protection, Consent and other legal concerns are dealt with in the wording of the consent clauses that the advertiser needs to accept prior to the publication of the advert. The advertiser is made fully aware that, in certain circumstances the independent repository of their information may be released to a third party.

The verification of compliance with the Regulations that this system gives is huge. It allows oversight of the regulations at the most important stage of a pup's life; its sale to its long-term owner.

## Fido Certification.

# = Chip & Pin

**If someone has both of these, they must have the cert.**

**If they have the cert, the DID knows them**

**If the DID knows them, the UIC saw and certified their POI**



## 10.6 EU Animal Health Law

[https://ec.europa.eu/food/animals/health/regulation\\_en](https://ec.europa.eu/food/animals/health/regulation_en)

## 11. Literature

The following literature was consulted and used as a base for describing elements of the Model Solution:

- EU-WIDE IDENTIFICATION AND REGISTRATION (I&R) FOR COMPANION ANIMALS, 2015,  
<http://www.carodog.eu/wp-content/uploads/2014/07/short-version.pdf>
- Identification and Registration, CaroDog; <http://www.carodog.eu/identification-and-registration/>
- 'Bundesweit einheitliche Kennzeichnung und Registrierung von Hund und Katze', Netzwerk K&R, 2017.  
<https://www.heimtierversorgung.net/kennzeichnung-und-registrierung/brosch%C3%BCre-k-r/>

## 12. References

- 1. United Nations. **United Nations Convention against Transnational Organized Crime and the Protocols thereto**. 2004. <https://www.unodc.org/unodc/en/organized-crime/intro/UNTOC.html>
- 2. European Commission. **Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the EU Strategy to tackle Organised Crime 2021-2025**. 2021, April 14. [https://ec.europa.eu/home-affairs/sites/default/files/pdf/14042021\\_eu\\_strategy\\_to\\_tackle\\_organised\\_crime\\_2021-2025\\_com-2021-170-1\\_en.pdf](https://ec.europa.eu/home-affairs/sites/default/files/pdf/14042021_eu_strategy_to_tackle_organised_crime_2021-2025_com-2021-170-1_en.pdf)
- 3. VIER PFOTEN. **‘Zu jung. Krank. Online Verramscht’: FOUR PAWS report on illegal puppy trading on eBay** [https://media.4-paws.org/1/6/d/5/16d58581bbc5174377cd7dff07058a404eaf0d7a/2018\\_eBayKurzanalyse\\_VIERPFOTEN.pdf](https://media.4-paws.org/1/6/d/5/16d58581bbc5174377cd7dff07058a404eaf0d7a/2018_eBayKurzanalyse_VIERPFOTEN.pdf)
- 4. Europetnet. **Pet ID-Search**. <https://www.europetnet.com/pet-id-search.html> [accessed 2021 June 9].
- 5. Dyre ID, fido.ie. **Pet ePassport**. <https://epetpassport.eu/> [accessed 2021 June 9].
- 6. Yeates, J. and Bowles, D., ‘Breeding and Selling Companion Animals’ in Jennifer Maher, Harriet Pierpont and Piers Beirne (eds), **International Handbook of Animal Abuse Studies**. Palgrave Macmillan. 2017.
- 7. Dogs Trust. **Written evidence – Pet Smuggling – PSM0014**. 2019. <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/environment-food-and-rural-affairs-committee/puppy-smuggling/written/105726.html>
- 8. Dogs Trust. **Dogs Trust to give evidence at special one-off EFRA session as ‘perfect storm’ creates even more lucrative market for puppy smugglers**. <https://www.dogstrust.org.uk/news-events/news/2020/dogs-trust-to-give-evidence-at-special-one-off-efra-session-as-perfect-storm-creates-even-more-lucrative-market-for-puppy-smugglers>. 2020, Nov 24.
- 9. Animal & Plant Health Agency. **Commercial Import of Dogs, Cats and Ferrets, Import Information Note (IIN) BLLV/5b**. <http://apha.defra.gov.uk/documents/bip/iin/bllv-5b.pdf>. March 2021.
- 10. Maher, J. and Wyatt, T. Rural-urban dynamics in the UK illegal puppy trade: Trafficking and trade in ‘man’s best friend’ (2019) 2 (special issues on Rural Crime). **International Journal of Rural Law and Policy**, Article ID 6266, <https://doi.org/10.5130/ijrlp.2.2019.6266> 2019.
- 11. RSPCA. **Sold a pup? Exposing the breeding, trade and sale of puppies**. 2016.
- 12. Maher, J. and Wyatt, T. Rural-urban dynamics in the UK illegal puppy trade: Trafficking and trade in ‘man’s best friend’ (2019) 2 (special issues on Rural Crime). **International Journal of Rural Law and Policy**, Article ID 6266, <https://doi.org/10.5130/ijrlp.2.2019.6266> 2019.
- 13. Eurogroup for Animals. **What are the new rules applying to the commercial movement and rehoming of pets after Brexit**. <https://www.eurogroupforanimals.org/news/what-are-new-rules-applying-commercial-movement-and-rehoming-pets-after-brexite>. 2020, Dec 18.
- 14. Gov.uk. **Guidance: Importing or moving live animals, animal products and high risk food and feed not of animal origin**. <https://www.gov.uk/guidance/importing-or-moving-live-animals-animal-products-and-high-risk-food-and-feed-not-of-animal-origin#import-live-animals-and-germinal-products> Published 31 December 2020. Updated 27 May 2021. [accessed 2021 June 9].
- 15. Battersea. **Compulsory Microchipping: Three Years On**. [http://www.bdch.org.uk/files/Microchipping\\_Report\\_2019.pdf](http://www.bdch.org.uk/files/Microchipping_Report_2019.pdf) 2019.
- 16. Animal Welfare Victoria. **Pet Exchange Register**. <https://per.animalwelfare.vic.gov.au/> [accessed 2021 June 9].

- 17. The Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018. <https://www.legislation.gov.uk/ukdsi/2018/9780111165485>
- 18. Question for Department for Environment, Food and Rural Affairs, UIN 170766, tabled on 17 March 2021 <https://questions-statements.parliament.uk/written-questions/detail/2021-03-17/170766>
- 19. Europetnet. **Pet ID-Search**. <https://www.europetnet.com/pet-id-search.html> [accessed 2021 June 9].
- 20. Irish Statute Book. **Animal Health and Welfare (Sale or Supply of Pet Animals) Regulations 2019**. <http://www.irishstatutebook.ie/eli/2019/si/681/made/en/pdf>
- 21. Irish Statute Book. **Microchipping of Dogs Regulations 2015**. <http://www.irishstatutebook.ie/eli/2015/si/63>
- 22. Europetnet. **EPN Member**. <https://www.europetnet.com/epn-member.html> [accessed 2021 June 9].
- 23. Animal Welfare Victoria. **Pet Exchange Register**. <https://per.animalwelfare.vic.gov.au/> [accessed 2021 June 9].
- 24. Animal Welfare Victoria. **FAQS: Pet Exchange Register**. [https://agriculture.vic.gov.au/\\_\\_data/assets/pdf\\_file/0003/560046/FAQs-pet-exchange-register.pdf](https://agriculture.vic.gov.au/__data/assets/pdf_file/0003/560046/FAQs-pet-exchange-register.pdf)






## 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 and friends, the organisation advocates for a world where humans treat animals with respect, empathy and understanding. The sustainable campaigns and projects of FOUR PAWS 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 conflict zones. With offices in Australia, Austria, Belgium, Bulgaria, Germany, Kosovo, the Netherlands, Switzerland, South Africa, Thailand, Ukraine, the UK, the USA and Vietnam as well as sanctuaries for rescued animals in eleven countries, FOUR PAWS provides rapid help and long-term solutions.

## FOUR PAWS UK

7-14 Great Dover Street  
London SE1 4YR, United Kingdom  
Telephone: +44 (0)20 7922 7954  
[office@four-paws.org.uk](mailto:office@four-paws.org.uk)

-  [four-paws.org.uk](https://four-paws.org.uk)
-  [facebook.com/fourpawsorg](https://facebook.com/fourpawsorg)
-  [twitter.com/@fourpawsuk](https://twitter.com/@fourpawsuk)
-  [youtube.com/fourpawsuk](https://youtube.com/fourpawsuk)
-  [instagram.com/fourpawsuk](https://instagram.com/fourpawsuk)