



Letter to the European Commission

Dear Commissaire Ansip,

Dear Commissaire Andriukaitis,

We, the leading European veterinary associations FVE, UEVP and FECAVA,¹ together with the international animal welfare organisation FOUR PAWS, wish to express our concerns about the increasing problems arising from the unregulated trade in animals on the Internet.

The scale of online advertising by cat and dog breeders and sellers/dealers has significantly increased within the EU in recent years.² Some classified ad sites now have as many as 200,000 adverts featuring pets for sale online at any one time.³

It may have come to your attention that the Internet is the crucial channel through which fraudulent sellers get in touch with unsuspecting customers. It is also used for selling endangered, dangerous and protected animals that are advertised as pets.⁴ It is often claimed that the illegal wildlife trade is one of the most valuable illicit markets after – depending on the source – narcotics, humans, arms or counterfeit products.⁵ This does not even include the illegal and unscrupulous trade in pets. The illegal trade in puppies is thriving. It is a lucrative income generator, offering huge profit margins (a puppy bought in Poland for €50 can be sold in Germany for €1,000⁶). The perspective of such easy benefits makes the illegal puppy trade a multi-million-euro business.

Currently, the online trade in animals is not regulated at all (apart from limited regulations in Austria, Belgium and France). This unregulated and sometimes illegal trade carries various risks, such as the cross-border spread of infectious, including zoonotic diseases animal cruelty and species extinction. There are also the financial consequences of exploitation of tax loopholes, and the emotional and financial trauma suffered by European families who must deal with sick and dying animals, they have bought online.

FOUR PAWS' investigations into the internal policies of 43 classified ad sites reveal huge disparities from one site to another.⁷ A CAROdog report released in June 2016 shows that despite the existing

¹ FVE, the Federation of Veterinarians of Europe; UEVP, the Union of European Veterinary Practitioners; and FECAVA, the Federation of European Companion Animal Veterinary Associations.

² https://ec.europa.eu/food/sites/food/files/animals/docs/aw_eu-strategy_study_dogs-cats-commercial-practices_en.pdf, page 25

³ <http://www.vier-pfoten.org/en/news-press/press-archive/four-paws-press-releases-2016/20160622/>, or see e.g. <https://www.ebay-kleinanzeigen.de/s-haustiere/c130>

⁴ <http://www.ifaw.org/united-states/news/report-wanted-%E2%80%93-dead-or-alive-exposing-online-wildlife-trade>

⁵ See <http://www.traffic.org/trade/>, or

http://d2ouvy59p0dg6k.cloudfront.net/downloads/wwffightingillicitwildlifetrafficking_lr_1.pdf page 9.

⁶ <http://www.spiegel.de/international/europe/the-puppy-mafia-black-market-in-dogs-big-business-in-germany-a-699228.html>, Market visit in Poland, 2016

⁷ <http://www.petdeception.org/en/comparison-tool-landing-page>

EU rules on cat and dog movement, dealers can still exploit the loopholes in legislation to carry out their illegal activities.⁸ The cross-border nature of these problems, the potential damage to the European Internal Market and the fact that the existing legislation on pet movement is still not sufficiently applied motivate us to write to you.

The Internet is one of the most important vehicles of animal-related fraud with organised crime having classified ad sites and other selling channels, which can be used anonymously, making it easy to hide the volume of illegal trade. There is also very little consumer protection for people who buy pets online with many animals being poorly bred with long-term hereditary diseases and behavioural problems.

In order to enable responsible selling and buying on the Internet and to exclude any fraudulent pet sellers, we would like to propose to you a set of carefully considered measures to regulate the online trade in animals on classified ad sites. We are calling on the European Commission to introduce these mandatory measures to regulate all online websites that feature live animals for sale, by legislation. We recommend that social media sites such as Facebook are banned from featuring animals for sale, as it would be very difficult to monitor this activity on these sites and it is unlikely that they would be able to implement the measures necessary to facilitate the responsible selling of animals online.

Recommended principles for EU legislation to regulate the online trade in animals:⁹

- a) **Seller verification**: The identity of animal sellers must be thoroughly verified. Sellers must register with the site and verify their identity for example with a bank account, or a similar method that excludes anonymous registration. Only one seller account per person per site must be allowed. This is the most important measure, as it ends anonymous trading and excludes the possibility of one individual operating multiple accounts and selling for example large numbers of animals, whilst appearing to be a private breeder. This would also help reduce tax evasion.
- b) **Mandatory information**: The seller must provide mandatory information on an animal that is for sale, and this should be displayed in the advert in a set format - for example the age, gender, vaccination records, microchip number, and husbandry requirements – please see campaign website¹⁰. This will help the public to make an informed decision when purchasing a pet online and reduce the number of animals bought on impulse.
- c) **No “wanted” adverts**: There should be no opportunity for prospective buyers to post ads (e.g. “I am looking for a cheap puppy”) as these proposed measures could then be circumvented by dealers contacting the buyers directly.
- d) **Checking of animal adverts**: The classified ad site must check all animal adverts before they go live to ensure that they do not violate the site’s terms of use or the law on animal sales. Ideally, the classified ad sites themselves should verify whether an animal’s stated transponder number really exists (by checking on a registration database such as Europetnet). Failing that, the number should at least be published so that consumers can check it themselves.

⁸ Report on the “Identification, Vaccination and Movement of dogs and cats in Europe”, available on <http://www.lawyersforanimalprotection.eu/wp-content/uploads/2016/08/INSIDE.pdf>, e.g. see page 80.

⁹ More information about all the measures that FOUR PAWS asks classified ad sites to implement can be found on the campaign website at <http://www.petdeception.org/en/measures-information>

¹⁰ www.petdeception.org

- e) Number of adverts for private sellers: there must be a maximum number of animal ads for private sellers (stricter national laws should remain in place – e.g. Austria has banned private individuals selling animals publicly).
- f) Pre-sales information: The site must provide high-quality pre-sale information/advice on responsibly buying and selling a pet (in particular, there should be information on the care of the commonly advertised companion animal species).
- g) Type of seller: Every advert on the site must clearly indicate whether it is a private sale, commercial sale or shelter/rehoming centre adoption.
- h) Report button: The site must provide a report button so that buyers and the general public can report an advert which violates the site rules (terms of use)
- i) Site Rules: The site must have a list of site rules (terms of use) for animal sales, as well as a clear policy on animal welfare on its site so that the public can easily access it.

Formal and informal exchanges with classified ad sites have clearly shown that they are waiting for legal requirements in this field to be introduced before implementing relevant changes.

FVE, UEVP and FECAVA have recently released a report “Working towards responsible dog trade”, which also strongly calls for regulation of the Internet.¹¹

We therefore urge you to start the drafting process – both for the proper functioning of the internal market, and for the health and well being of European citizens and their pets.

We remain at your disposal to answer any questions you might have and to discuss any issues related to this proposal. We look forward to receiving your response

Yours sincerely,

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