



# **Tracing the Trade:**

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



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

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

We welcome your suggestions, questions and participation in the Model Solution. Please contact us via [office@vier-pfoten.org](mailto:office@vier-pfoten.org).

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## 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.

Note: This report will not cover TRACES (TRAdE Control and Expert System) as this system is currently in a reforming process.

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## 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 Heli Dungler

**The illegal puppy trade is big business, profiting off the backs of thousands of exploited breeding dogs and their puppies.** Every year, countless puppies are bred in deplorable conditions and transported across Europe to be sold online via classified ad sites. Often sick and unvaccinated, these puppies are taken on traumatic journeys for hundreds of miles across borders, greatly impacting their welfare and posing considerable risk to both human and animal health.

**The profit margins are huge for unscrupulous dealers – who can purchase a puppy in Eastern Europe for as little as 50 Euros and then sell them online for up to 1,000 Euros.** Illegal puppy dealers have even professionalised their businesses to take advantage of unwitting customers; they pose as reputable, or private, breeders and even rent residential properties so they can sell their puppies under the guise of being ‘homebred’. The lack of traceability for online sellers is one of the key enablers of this trade as illegal puppy dealers can simply disappear without a trace once they have sold a puppy online, leaving unsuspecting new owners to deal with sick animals and often expensive veterinary bills.

**Raising awareness is not enough, we need to make sure that both the animals sold as part of this trade and their sellers are traceable.** FOUR PAWS has been calling for better regulation of online classifieds as these platforms are the main channel to market for the illegal puppy trade. However, we now have an unprecedented opportunity to phase out the illegal puppy trade once and for all through the introduction of the EU Animal Health Law (AHL). Our Model Solution uses the AHL and the registration of all breeders and sellers establishments, as an opportunity to lobby for the Identification and Registration (I&R) of dogs in several countries where this is not yet mandatory. Both can be used to provide classified ad sites with the opportunity to check and verify the identity of sellers and their dogs before they are featured for sale online. Puppy dealers don’t want to be traced, so **by providing online classified ad sites with the tools to verify a seller’s identity and the puppy’s registration**, we can effectively block market access for the illegal puppy trade.

The path to eliminating the illegal puppy trade is not a straightforward one, but we believe our Model Solution can greatly inhibit the illegal trade and ultimately help to prevent the suffering of millions of puppies and dogs across Europe, whilst protecting both human and animal health.

**Heli Dungler**

Founder and President  
FOUR PAWS

# 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 without identification or vaccination documents and with dogs coming from non-rabies-free countries.

Consumer demand, driven by 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.

Over the last ten years, 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, it's not just an animal welfare problem. Illegal puppy trading is a major organised crime within the EU, and a significant public health risk. The puppies are raised in unsanitary conditions and rarely vaccinated, 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.

Of course, in today's market, it is the internet that has helped to facilitate the illegal trade, with the online trade of puppies in Europe estimated at more than €1billion<sup>1</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 no requirement to verify their authenticity, 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>2</sup>: a significant first step towards greater traceability and accountability within the trade.

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<sup>1</sup> '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)

<sup>2</sup> The establishments will be registered in a central national establishment registration database.

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 our **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.**

The Model Solution aims to achieve a range of outcomes encompassing animal welfare, animal and human health, crime and fraudulent activity, tax revenue, consumer rights and market competition.

# 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 online 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 just for the breeders and sellers, but for 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 microchipping vet, the 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 data covering all stakeholders involved in the dog's life.

These comprehensive I&R databases – 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.

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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 and registered dogs can be advertised on their sites. Preferably, all breeders and sellers would also be obligated to provide their individual registration number before their advert could go live, to prove that their establishment is registered with the competent authority on a national establishment database (as required by the AHL). 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 an international entity such as Europetnet<sup>3</sup> could enable the collection of the necessary information from all national databases and the creation of an interface to provide a checking service for all classified ad sites across Europe. With this interface, the classifieds can verify that the information the seller has provided about the dog (inter alia, the microchip number) is correct, as well as – ideally – verifying if a seller is legally registered on a national establishment registration database (as required by the AHL).

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.

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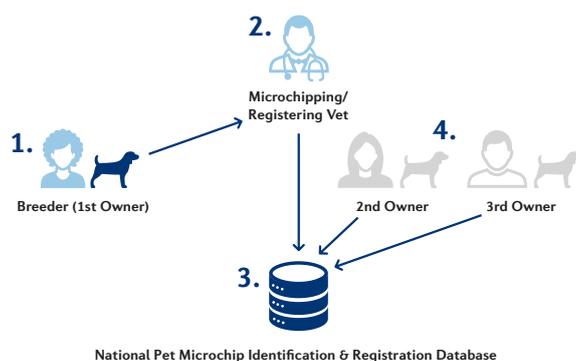
<sup>3</sup> Europetnet is a group of national and local associations based across Europe who register owner information about pets that have been uniquely identified with a transponder. <https://www.Europetnet.com/about/about.html>

# 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.

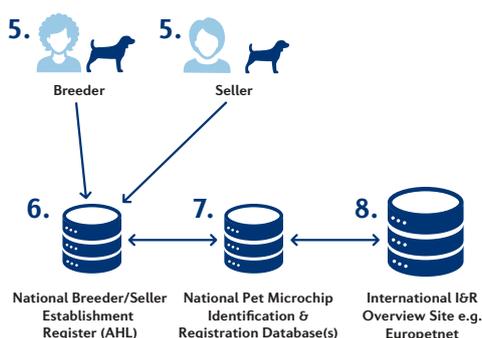
## Step 1.

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.



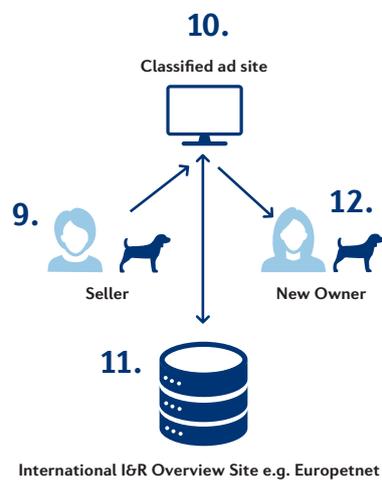
## Step 2.

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 the international overview site e.g. Europetnet. It should be a mandatory requirement that each European pet I&R database is a Europetnet member.



### Step 3.

9. If a seller (this could be a breeder or third-party seller) intends to sell a dog on a classified ad site, they will need to provide specific 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/breeder's registration number amongst other data.
10. The classified ad site will then send this information to Europetnet to verify if it is correct, via an automated check.
11. Europetnet will check this information against the relevant national pet microchip (I&R) database. If the information is correct, then the ad can go live. 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 check the seller's details via the classified ad site, find more information on all stakeholders in the national pet microchip (I&R) database, and quickly take action.



# 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 will apply in all EU member states from 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. There will be some cases exempt from this registration requirement, but strictly 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 or exempt 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.

Pet keepers (including owners, pet shop employees and foster homes) - defined as those keeping animals as pets, moving no more than five pets at a time, and not selling them or giving them up for adoption - are excluded from these rules.

The detailed requirements and rules on how Member States shall create the registration will be given in a series of Delegated and Implementing Acts.

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

# 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 will be regarded as highly trusted authorities by law enforcement agencies in uncovering malpractice.

## Benefits to classified ad websites

By introducing back-end checks to verify the identity of sellers and the dogs they are advertising, 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.

The databases will be regarded as highly-trusted authorities by law enforcement agencies in uncovering malpractice.

Classified ad 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.

# 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.**

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

# 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 be fitted with an injectable transponder 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 (at the latest) 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>4</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 and the owners' status (including their registration number as specified under the AHL, or as a private person). Upon registration, the owner's identification must be verified by either the vet or a qualified professional in order to ensure that reliable details are entered into the database. If the owner runs a registered establishment, the owner's information should be accessible by the vet logging onto the centralised national establishment register (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.
- (g) Dog owners must be required to inform the I&R database if they move or if their pet has died.
- (h) The I&R database should contain a list of any microchip numbers as well as any pet passport numbers issued by a competent authority. The details of the vet who received and provided the microchip and passport numbers must be documented; any vets providing blank passports and transponders, or engaging in other illegal practices, can then be easily identified by the authorities.
- (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) 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. All persons/establishments should be registered with their address.
- (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.

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<sup>4</sup> A Deep Validation Control system to verify the validity of the microchip numbers is available for free for companion animals at <https://www.dvc.services>.

- (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 feed certain data into the pan-European membership entity Europetnet, as Europetnet's data will be used to support the classified ad sites with their back-end checks.
- (o) The I&R database should generate a PIN for each owner, or each owner-dog registration, which enables identification of the owner. This PIN is provided to the owner. Only the I&R database and the owner know this PIN<sup>5</sup>.
- (p) The following data must be sent to Europetnet in real time after a change in the I&R database:
  - i Dog data, including microchip number, age, breed, country of registration, PIN, date of registration<sup>6</sup>.
  - ii Current owner data, including name, type of operators as specified under the AHL including the registration number; preferably also their address<sup>7</sup>.
- (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, noting of a dog being lost or stolen, rabies vaccination status (date, type, booster date), and other medical information.
- (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>8</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.

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<sup>5</sup> Please refer to the Irish model presented in the 'Best practice examples' section, as well as to the full explanation in the Annex.

<sup>6</sup> The date of registration is required for countries that require dogs to be registered for a certain length of time before a private person can sell them online, or for countries and classifieds that aim to introduce similar measures.

<sup>7</sup> In the case that an I&R database would not be able to provide the PIN to the owner, the owner-specific information is important to make the online trade checks safer.

<sup>8</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.

# Classified ad sites: automatically verify dog and seller registration details

Online classified ad sites are the prime channel for selling dogs across Europe, as they provide sellers with easy access to a significant pool of potential buyers as well as 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 all European I&R databases (for example 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<sup>9</sup>.
- (b) This back-end check will be carried out via an interface not visible or accessible to the public.
- (c) If a seller wants to post an advert on a classified ad site, they need to enter information about the dog and themselves into mandatory fields. The information is then sent automatically to Europetnet and automatically verified by them. Only if all the information given by the seller is confirmed as correct, can the ad go live.

Information the seller must provide:

- i On the dog: microchip number, breed\*, age\*, country of registration\*, preferably a PIN<sup>10</sup> (\*breed, age and the country of registration will be public in the ad, and the relevant fields cannot be changed anymore by the seller after the check).
  - ii On the owner: name, status (private, or registered as a establishment under the AHL including the registration number); preferably also the address.
- (d) The following requirements would need to be fulfilled by classified ad sites in order to fully implement this system:
- Request a new 'user role' at Europetnet
  - Create new online forms with mandatory fields which advertisers must complete
  - Include a drop-down menu of all dog breeds according to the list provided by Europetnet
- (e) 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 (for pets other than dogs, cats and ferrets: max. one animal ad of the same species per year, two animal ads per year in total).
  - 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, in a single advertisement.

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<sup>9</sup> 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.

<sup>10</sup> A PIN comparable with the Irish model (see Best Practice section). This PIN would provide an additional security level should in the first stage of implementation only dog data be checked (the establishment registration number for example might only become available in 2021). This PIN is only known by the I&R database and the owner and can thus be used as a checking element that increases security.

# 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.

## The Animal Health Law: implementation 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 implementation of the obligation to register establishments and operators (as per the AHL). Establishment registers need to be nationally centralised, digital, and accessible to competent authorities from all EU Member States.
- (b) This central digital register should ideally include transporters, approved establishments<sup>11</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.
- (f) Any breeder with more than four 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 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.

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<sup>11</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.

## 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>12</sup>.
- (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) Make it illegal to sell animals online via social media channels and closed forums.
- (e) Introduce significant penalties for breeders, transporters and sellers who fail to register, or fail to keep their registered information up to date – these penalties for anyone caught with unregistered or unidentified dogs need to serve as a real deterrent. Also, considerable penalties 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).
- (f) Make it a legal obligation that seller identities are verified for all online pet sales (of any animal).

## 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.

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<sup>12</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.

# 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 plus 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 check of the dog's data (microchip number, age, breed, county of registration) is not GDPR-relevant, as the information concerns an animal.
- The check of the registration number of an establishment, as well as the described PIN is not GDPR-relevant, as these numbers are already a pseudonym. From the perspective of Europetnet and the classified sites, this data is entirely anonymous data and therefore not GDPR-relevant.
- 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. 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.

## 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.

FOUR PAWS recommends that the back-end checks begin with checking the microchip number plus the PIN, and a basic set of details on the dog as a first step.

At a later stage, when the AHL's establishment register numbers are available, 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, 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.

## Conclusion

This report has outlined the necessary measures for the successful implementation of the Model Solution to enable full traceability of dogs across the EU 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 Europol 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 the EU.

# Appendix

## Expert and supporter statements

“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

“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

“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  
[International animal identification database]  
Austria

““

“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

““

“The Veterinary Association for Animal Protection e.V. (TVT) has been concerned about the lack of transparency in the international puppy trade for many years. Over 1,300 of our members who work as veterinarians in practices across Germany, as official veterinarians and in business and research, are increasingly confronted with the consequences of this trade; an increase in transmissible diseases such as distemper and parvovirus, seriously ill puppies are being sold online with no way of tracing their origin, and many overwhelmed owners are having to give up their behaviorally disturbed imported dogs. The Model Solution proposed by FOUR PAWS will provide transparency and traceability of this trade at European level, and improve both animal welfare as well as human and animal health.”

””

Dr. Andreas Franzky | Chairman of Tierärztlichen Vereinigung für Tierschutz e.V. (TVT)  
[Veterinary Association for Animal Protection e.V.]  
Germany

““

“Clear identification and registration of dogs in member clubs has been a standard within our association for a long time. The VDH participates intensively in both the alliance “Arbeitsgemeinschaft Welpenhandel” and network “K & R” [Identification and Registration] in order to achieve a national registration of all dogs and a registration in Germany. Within the EU member states, Germany is one of the three countries in which there is no national obligation to register. In order to establish effective rules to control and restrict puppy trade within the EU, it is particularly important to control and restrict online animal trade. The FOUR PAWS Model Solution and the inclusion of an EU-wide registration of all breeders, sellers and facilities such as animal shelters provides a concrete way of achieving these goals.”

””

Udo Kopernik | Verband für das Deutsche Hundewesen  
[VDH, German Kennel Club]

““

“The dubious trade of puppies, increasingly being sold via classified ad sites, represents a serious animal welfare problem in Europe and is associated with immense animal suffering. In order to dry-up the illegal market and create much needed transparency, the bmt expressly supports the Model Solution presented by Vier Pfoten. Since it ties in with existing European law and can fall back on already existing modern database systems for the identification and registration of animals, its successful implementation and national roll-out is ultimately only a question of political will”.

””

Karsten Plücker | Chairman of Bund gegen Missbrauch der Tiere (bmt)  
[Federation against Abuse of Animals]  
Germany

# 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. As outlined above, Europetnet could widen this remit to play a crucial role in the Model Solution. Europetnet is currently conducting its own feasibility studies as to whether they can provide the interface required for the back-end checks the Model Solution proposes. [www.Europetnet.com](http://www.Europetnet.com)

## **Pioneers for the Model Solution: Switzerland**

Switzerland is the first country with a classified ad site - [anibis.ch](http://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.

## **Pioneers in legislating the online dog trade: 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 as not all classified ad sites currently undertake them.

## **Approving I&R databases, 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), 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>13</sup>, which every member must meet to become a member.

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<sup>13</sup> <https://www.europetnet.com/eprn-member.html>

### **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, which could serve with its PIN as an alternative first step towards the full implementation of the Model Solution. 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. This system is not implemented yet. Please find the full description by Finbarr Heslin (CEO of Fido), in the annex of this report.

If other I&R databases can provide such PIN numbers, and the data is entered by a qualified professional who has verified the identity of the owner as well, the Irish system would provide more security when checking the dog’s microchip number, age, breed and country of registration as a first step in the implementation of the Model Solution. The PIN as a ‘secret element’ would also be very relevant if a classified ad site wished to publish the microchip number in the advertisement.<sup>14</sup>

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

In Germany there is still no national I&R legislation for dogs and cats, but 16 diverse rules in the Bundesländer (states). To address this, a high-level consortium of animal welfare officers, veterinarians, databases, technical experts, and animal welfare organisations has developed a system to avoid unnecessary costs and bureaucracy by establishing a new ‘umbrella’ database. The concept enables access to all existing databases (private and public) via one common interface, providing one national contact point with different levels of access for private persons (vets, shelters, owners etc.) and public administration (police, public vets, prosecutors, communities etc.). In just one step the user is lead to the right register, having proved their access permission. This will be a digital service, with initial investment required to build the interface and the access managing system, but without significant running costs. The model is still currently a work in progress, with pilot projects due to start in Autumn 2019 in three Bundesländer. If successful, it could serve as a national model for other countries with diverse databases and form an EU-wide basis for I&R practice<sup>15</sup>, facilitating one data contact point per Member State, and extending the access rules to a third group, such as Europetnet.

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

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<sup>14</sup> Further options such as auto-fill in of age, breed, country of registration into the ad are described in the Annex.

<sup>15</sup> The concept includes technical conditions which are EU wide compatible, based on the CAROdog and CAROcat Canine and Feline Experts group.

## **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**

The state government of Victoria in Australia is proposing 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:

“Add a new requirement that the record associated with microchips of dogs or cats include the source number of the breeder.”<sup>16</sup> The explanation states: “This proposal is key to increasing traceability of dogs and cats to breeders. It will not apply to any animal other than dogs and cats (e.g. horse). Currently, records associated with microchips require specific information about the dog or cat, as well as their owner. It is proposed to include the breeder's source number so that the dog or cat can be traced back to the original breeder.”<sup>17</sup>

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<sup>16</sup> What is the Breeder Source Number: “The Domestic Animals Amendment (Puppy Farms and Pet Shops) Act 2017 establishes the Pet Exchange Register. From 1 July 2019, any person or business who is advertising to sell or give away a dog or a cat will need to be enrolled on the Pet Exchange Register. In some circumstances, local councils will enrol the person or business. Once enrolled, a source number will be generated, which will improve the traceability of dogs and cats, and allow councils and specific authorised officers to more effectively monitor those acting unlawfully.” <http://agriculture.vic.gov.au/pets/puppy-farm-legislation/pet-exchange-register>

<sup>17</sup> <https://engage.vic.gov.au/domestic-animals-regulations-amendment-2019>

# 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.

**- SAMPLE -**

**DOG MICROCHIPPING CERTIFICATE**

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

Issuing Authority: **fido.ie** Microchip Number: \_\_\_\_\_  
PIN: \_\_\_\_\_ **Use this PIN to verify this cert**

This is not a suitable 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: _____	Date of Implantation: _____
Date of Birth: _____	U.I.C. of Implanter: _____
Breed: _____	U.I.C. of Registrar: _____
Colour: _____	
Markings (if any): _____	
Gender: _____	

Registered Owner: \_\_\_\_\_

**Address where normally kept:**  
\_\_\_\_\_  
\_\_\_\_\_

To view details associated with this registered dog you may still use fido.ie, where you will be asked to enter the microchip number and the current PIN (printed above).

----- DETACH HERE -----

**Owner Details:**

Name: _____	Telephone Number: _____
Address: _____	
	Email Address: _____

Microchip Number: \_\_\_\_\_ PIN: \_\_\_\_\_

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 if any changes to them.

Use this PIN to log in and edit details.  
Do NOT give this PIN to others.

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



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



18 A UIC is a Vet Surgeon, Vet Nurse or approved Lay Implanter; remark from editors

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.
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 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.



# EU Member States without mandatory identification and registration of dogs



## EU Animal Health Law

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

## 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/>



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