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# Puppy scammers exposed: how deceptive dealers cash in on the illegal puppy trade across Europe

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In 2021 and 2022, FOUR PAWS executed investigations in the United Kingdom (UK), the Netherlands, Romania and Bulgaria to test the legitimacy of offers for puppies advertised for sale on online classified ad websites<sup>1</sup>.

Investigators analysed hundreds of puppy adverts and visited suspect dealers in order to expose the various aspects of the illegal puppy trade, the extent of problem, and the numerous methods unscrupulous sellers employ to deceive buyers.



## KEY FINDINGS

Investigations revealed that an alarming number of puppies advertised on classified ad sites in the UK and the Netherlands are being illegally imported from Eastern Europe. Investigators met with puppy dealers and owners of puppy farms offering underage puppies for sale, as well as corrupt veterinarians willing to supply falsified documentation for puppies. In all countries where investigations took place, laws and animal welfare requirements were wilfully disregarded, with unscrupulous puppy dealers employing various methods of deception to trick buyers into purchasing illegally imported puppies.

Investigators found:

### Classified ad sites - UK and the Netherlands

- ➔ industrial-scale puppy imports from several different European countries into the UK with almost a third of classified ads surveyed advertising illegally imported puppies.
- ➔ more than 40% of puppy ads in the Netherlands showed signs of illicit imports.
- ➔ almost 50% of puppy ads surveyed on UK's Gumtree were confirmed to be illegal imports.
- ➔ unscrupulous sellers used multiple online accounts, a range of identities, numerous phone numbers and false locations to sell puppies without accountability.
- ➔ illicit sellers appeared legitimate and used many methods of deception, making it very difficult for puppy buyers to spot illegal dealing.
- ➔ cross-border dealers advertising puppies before they even arrived in the UK due to a near constant supply.
- ➔ puppies were regularly sold without veterinary checks and often with dubious veterinary paperwork, calling into question the validity of the puppies' rabies vaccinations.

### Breeding countries - Romania and Bulgaria

- ➔ in Romania, more than 80% of breeders investigated declared that they participated in illegal activities.
- ➔ most of the 18 breeders visited in Romania worked with corrupt veterinarians to obtain passports for underage puppies with fraudulent vaccination records, creating a serious health risk.
- ➔ in Bulgaria, 18 of the 19 sellers visited showed a visible violation of the minimum age, identification, registration, or vaccination requirements for the advertised puppy.
- ➔ in Romania it was common practice for breeders to export puppies to other EU countries and the UK and sell them without EU passports, or rabies vaccinations. Some even provided false records of the puppy's date of birth and rabies vaccinations.
- ➔ breeders were willing to falsify puppies' documents and offered tips for bypassing existing regulations.
- ➔ in both Bulgaria and Romania breeders were found selling multiple breeds of puppies kept in poor conditions, as well as breeding bitches housed in cages or other inappropriate environments.

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# Introduction

FOUR PAWS has been working for over a decade to address the issue of the illegal puppy trade in Europe. Each year, millions of puppies are sold online across the continent, with online classified ad sites serving as one of the key channels for these sales<sup>2</sup>. These sites provide the perfect platform for unscrupulous dealers to operate illegally, enabling them to profit from selling underage puppies. Often bred in poor conditions and transported illegally across borders from Eastern Europe, these young puppies are particularly susceptible to health and behavioural issues. Many are sold without having received veterinary care or the necessary vaccinations, and often with fraudulent documentation.

The COVID-19 pandemic and subsequent lockdowns created a spike in demand for puppies, further fuelling the illegal puppy trade across Europe. The FOUR PAWS 2022 Pandemic Pups report<sup>3</sup> outlined how alarming numbers of puppies were sold during the pandemic in breach of legal requirements. Many of these puppies became sick after purchase and sadly, some even died. The report also detailed the many risks buyers face when purchasing a puppy online, and now even a year later, the risks remain ever present.

This latest report summarises the findings from investigations carried out in the UK, the Netherlands, Romania, and Bulgaria between 2021 and 2022 to test the legitimacy of puppies offered for sale on classified ad sites. The investigations undertaken offer evidence of industrial scale imports of puppies and highlights just how prolific the sale of imported puppies is on online classified advertising sites in the UK and in the Netherlands. Investigations in all four countries have shown the ease with which cross-border dealers can sell underage puppies online. This highlights not only the lax or non-existent verification of online sellers' identities but also the lack of verification of both puppy's and sellers' registration in a pet microchip registration database.

FOUR PAWS' research has uncovered the scale of the trade, and the various methods of deception unscrupulous dealers employ to trick unsuspecting buyers into purchasing an illegally imported puppy, proving they will go to great lengths to cover their tracks. The report concludes with key recommendations for improving puppy buyer awareness and outlines the need for stricter controls on classified ad sites, and ultimately – for stricter regulations at legislative level.

# The Illegal Puppy Trade

The European commercial trade of puppies is highly lucrative. In the UK alone, sales of puppies advertised online are estimated to be worth £130 million per year<sup>4</sup>. Classified ad sites are amongst the most popular online platforms for puppy sales, and they continue to be the ideal platform for unscrupulous puppy dealers. These sites offer illicit dealers easy access to a vast pool of potential buyers without much risk of being caught. Most classified ad sites still do not require sellers to verify their identity, nor do they ensure that puppies advertised for sale are microchipped and registered to their seller, leaving both sellers and puppies largely untraceable. Some sites have measures in place which might allow the seller to be identified via third parties. However, some measures do not seem to deter sellers wishing to advertise illegally imported puppies, as there is little risk for dealers to be identified and prosecuted.

The illegal trade often begins on puppy farms in Eastern Europe, where vast numbers of dogs are bred in poor conditions, and then either sold at source, or transported, often across multiple countries, to be sold to target markets in Western Europe. Thousands of breeding dogs are kept in appalling conditions, forced to produce litter after litter, and their vulnerable puppies are taken away from them far too early. These young dogs, often sick and unvaccinated, are then sold on online classified ad sites by puppy dealers, often with forged or non-existent identification and vaccination documents.

The illegal puppy trade involves the breeding and selling of pets in a way that breaches the public health, transport and animal welfare rules set by EU and national law. These puppies are trafficked, often underage and in poor health, from holdings that are either unauthorised or breaching EU law. This trafficking is eased by the lack of an EU requirement to register a dog's microchip code, health information, and the status of their keeper (breeder, seller, owner, etc) in a state level database. With time, the overreliance on the paper Pet Passport to certify this data has allowed sellers to forge documents, bypass the EU rules for trade, and misuse those for the non-commercial movement of pets.

Despite the efforts of authorities, including cross-border, illegally bred and traded dogs increasingly find their way to the market via online channels. Around 438,000 dogs are offered online on any given day in Europe.<sup>5</sup> Some sites have introduced a mandatory seller payment verification however most do not require mandatory verification of the puppy's microchip registration, which is required to trace their origin. This means that puppy dealers can simply advertise a puppy, make a quick sale, and disappear once the buyer has collected, or they have delivered the puppy. Some have even been known to take a buyer's money without ever handing over a puppy. The mandatory payment as a means of verification also seems not to have deterred illegal puppy dealers from the sites that have implemented it, for example, Gumtree UK.

FOUR PAWS' goal is to deter illegal puppy sellers from the online market by making the trade transparent and accountable. We want sellers to be traceable, and therefore accountable for their business. Through working with key industry stakeholders and pet registration databases, FOUR PAWS together with Europetnet developed an application programming interface (API) (VeriPet) that classified ad sites can use to ensure that only the registered keeper of the dog can advertise that specific dog.

In order to legally register a dog, keepers usually must verify their identities and the details of their dog with their relevant pet registry. When advertising a dog, the seller has to provide the dog's microchip number, and with a two step-authentication process, it is ensured, that only the registered keeper can post the advertisement. Through the published microchip number, the seller can be traced and held accountable if something goes wrong.

In addition to VeriPet, FOUR PAWS continues to provide evidence and solutions for decision-makers to introduce legislation to regulate the online pet trade and to improve traceability online.

Finally, FOUR PAWS launched a public awareness campaign specifically aimed at puppy buyers to highlight the personal risks of buying a puppy from the illegal trade, as well as providing them with information and resources they can use to help them responsibly and safely acquire a puppy.

Illegal puppy trading presents many risks. It undermines the work of responsible breeders, burdens unsuspecting new owners with emotional and financial costs, and facilitates tax evasion due to the fraudulent nature of its activities. For the EU, the illegal cross-border trade not only compromises public health efforts, but it also creates unfair competition for responsible breeders, and strips European consumers of protection and their rights.



## Regulation of the trade

### Regulation across the EU

The issue of the illegal pet trade has received increased attention in the EU. 2017 saw the establishment of the European Commission's expert group, the EU Platform on Animal Welfare, of which all EU and European Economic Area countries are members, as well as the European Food Safety Authority, the World Bank, the Food and Agriculture Organisation of the United Nations, the World Organisation for Animal Health and 40 business, professional and civil society organisations, and independent experts. The Subgroup on Pets in Trade operating under the Platform has been working on the production of guidelines, including guidelines on responsible dog and cat breeding and socialisation, commercial movement, and online trade. These guidelines were endorsed by the Platform as best practices.<sup>6</sup>

In 2019, the outcomes of an EU Coordinated Control Plan demonstrated the level of misconduct in online pet sales and scale of illegal trade, with ads of trafficked, underaged, unvaccinated or sick animals with fake documents, and a serious mismatch between the sellers' status (private or commercial) and size of activity.<sup>7</sup> In 2020 the European Parliament, through its Resolution on protecting the EU's internal market and consumer rights against the negative implications of the illegal trade in companion animals (2019/2814(RSP))<sup>8</sup>, repeated its call to the Commission for measures that would help address the illegal pet trade. These included identification and registration (I&R), regulation of the online pet trade, full animal and seller traceability, and minimum validation checks on the identity of online sellers. The illegal trade in companion animals is also recognised by the EU Strategy to tackle Organised Crime (2021-2025) as a persisting matter with severe implications.<sup>9</sup>

Over the past years, the European Commission and Member States have received an increasing number of fraud-suspected requests and calls for assistance related to pet movement by administrative and control authorities. As a response to that, the European Commission launched in 2021 an EU Enforcement Action/Coordinated Control Action Plan against the illegal movement of cats and dogs.<sup>10</sup> The Action involves the European Commission, all EU and EFTA countries, as well as EUROPOL and Eurojust. It aims to monitor how the EU and national law is enforced, detect loopholes, train authorities, understand how illegal operators act and identify them.

Details of the investigation findings presented in many of the case studies within this report have been reported to the relevant authorities as part of the Coordinated Control Action Plan.<sup>11</sup>

With regards to regulation of the online advertisement of dogs for sale online, only around a quarter of Member States have introduced regulation, and the measures vary significantly. Some require that all online adverts include the dog's microchip number, and others have prohibited online advertising by anyone other than the breeder, or by the breeder or registered trader.<sup>12</sup>

## Overarching EU legislation (health and welfare of dogs in transport)

The EU Animal Health Law (Regulation (EU) 2016/429) on transmissible animal diseases, and the Delegated and Implementing Regulations that supplement it, outlines rules for the detection, prevention, and control of zoonotic diseases. This includes identification requirements and documentation required for the commercial and non-commercial movement of dogs. **All breeders and sellers of dogs that operate at a level entailing organisation and continuity of activities should be registered with the competent authority.** Similarly, a registration obligation applies for all shelters and transporters of these animals.

The competent authority must create and maintain registries of these establishments, which should be made available to the authorities of other Member States and the European Commission to oversee movement of these animals. The Regulation also provides the legal base for the introduction of a harmonised system for the identification and registration of dogs in databases that are interoperable.

Regulation (EC) 1/2005 on the protection of animals during transport and related operations prohibits:

- ➔ the transport of dogs and cats of less than eight weeks of age (unless they are accompanied by their mother).
- ➔ the transport of pregnant females who are at 90 % or more of the expected gestation period, or females who have given birth in the previous week.

During transport, dogs must be fed every 24 hours and provided with water every eight hours. They must also not be transported in a way likely to cause them injury or undue suffering, and their welfare must be regularly checked and appropriately maintained.

## Animal welfare requirements by country and legal framework

At present, there is insufficient EU legislation to protect dogs involved in commercial practices, leaving the responsibility to individual countries to legislate at the national level. The legislation at country level can vary greatly however, with some having more robust measures in place than others. The following table gives a brief overview of the legislation in each of the countries where investigations took place.

### Country legislation

#### *United Kingdom*

All dogs must be microchipped and registered by the age of eight weeks old, and the puppy's breeder must be the first registered owner on the microchip. It is then the buyer's responsibility to change this to their details once the puppy is in their possession. Owners of dogs and puppies over the age of eight weeks must also have registered their pet's microchip details in an authorised database.

When travelling to and from Great Britain to the EU, dogs must be microchipped, have a valid rabies vaccination, and an animal health certificate (AHC). From 1st January 2021, pet passports are no longer valid for pets travelling from Great Britain to the EU. Dogs being imported from the EU into GB can use a pet passport, however.

The minimum age for selling a puppy is eight weeks and 15 weeks for imported puppies. Licensed breeders should not sell a puppy in need of veterinary care. Dog adverts must include the seller's licence, name of authority that issued the licence, picture of the dog advertised, and the dog's age. Breeders can supply a puppy contract containing the dog's health details. A Kennel Club certificate (if applicable) needs to include pedigree, microchip, vaccination and health details. Under the regulations, dog breeders must have a licence, if they do either or both of the following:

- ➔ breeding 3 or more litters of puppies in any 12-month period - unless they can prove that none of the puppies have been sold as puppies or adults
- ➔ breeding dogs and advertising a business of selling dogs - as defined under the business test

Lucy's Law is the 2020 regulation in England, Wales and Scotland that bans the commercial third-party sale of puppies and kittens, under six months old, by anyone other than a registered breeder. The regulation was passed in 2020, under the instrument of the Animal Welfare (Licensing of Activities Involving Animals) (England) (Amendment) Regulations 2019. Lucy's Law also requires a puppy to be sold from the premises they were born and raised on, and for the puppy to be seen interacting with their mother before they are sold.

## *The Netherlands*

Puppies must be registered to their first owner who also need to have a nationally registered unique business number (UBN). Microchipping is carried out no later than seven weeks after the dog's birth by a registered chipper (that can be a veterinarian). Registration needs to be completed no later than one week after that, and before changing owners. If a dog changes owner, details of the new owner must be updated within two weeks. The new owner is not obliged to have a UBN number.

If a dog is imported to the Netherlands for the first time, the veterinarian must register the dog and include their data with the dog's registration up to 14 days upon entry to the Netherlands, before passing the dog to another person.

A pet passport must be issued within seven weeks of the puppy's birth and can only be issued by a veterinarian and only if the keeper supplies a UBN (national registry number). The dog's microchip details must also be entered by a veterinarian.

The minimum age for selling a puppy is seven weeks, and 15 weeks for all EU and third country imports. Sellers must provide buyers with relevant information regarding the health status of the dog and proof of vaccination. Proof of vaccination is issued by a veterinarian and imported dogs must have a health certificate and mandatory rabies vaccination.

## Romania

All dogs must be microchipped by 90 days of age, or before transfer of ownership has taken place. Once microchipped, the dog must be registered on the national database within five days. A dog who is not microchipped and registered cannot be vaccinated against rabies, which is an obligation for all dogs and cats in Romania.

Romanian legislation only allows the sale of pedigree puppies and prohibits the breeding of non-pedigree dogs. All non-pedigree dogs must also be sterilised unless they belong to a specific breed, as proven by an official document from a dog breeding association. Breeders are also required to be registered with the relevant authorities.

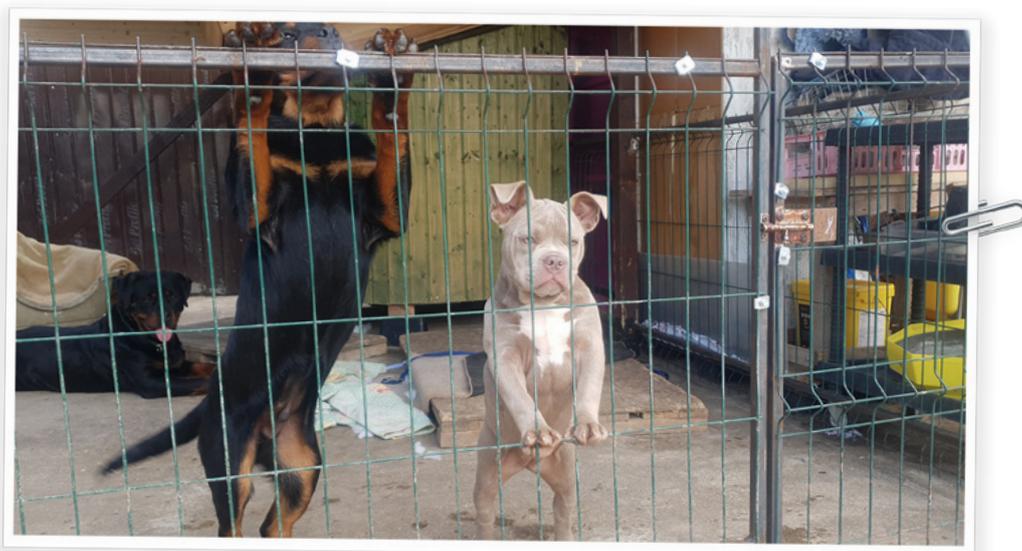
A pet passport is only required for dogs leaving Romania. All dogs must have a health card and their health status must be updated in the Registry of Dog Owners (RECS). The minimum age for selling a puppy is eight weeks and 15 weeks for imports for commercial purposes from the EU and for third countries.

## Bulgaria

Mandatory identification and registration of dogs over six weeks of age is required in Bulgaria and a puppy must be registered to their first owner before they can be sold. A dog's Pet Passport must include their microchip and vaccination details. Vaccination information must also be provided to the registration database. There are penalties for people who privately sell unregistered dogs without microchips.

The minimum age for selling a puppy is eight weeks for non-commercial and commercial sales from the EU, and 15 weeks for dog imports from third countries. Only healthy dogs should be sold.

The investigation findings below showcase how the existing regulations have often been violated, and how dealers and breeders use the varying legislation across Europe as an excuse for breeding and selling puppies in breach of the requirements in the given country.



# Methodology and scope of the investigations

In 2021 and 2022 FOUR PAWS executed investigations in the UK, the Netherlands, Romania and Bulgaria to test the legitimacy of offers for puppies advertised on classified ad sites, and to expose the various methods unscrupulous dealers employ to deceive buyers. The UK and the Netherlands represent examples of illegal dealers' target countries, while Romania and Bulgaria are representative of the source countries (which also include the Czech Republic, Poland, Serbia, Slovakia, Hungary and other Eastern European countries) where many of the puppies are originally bred. Romania was picked as a research country after the investigation conducted in the UK, which showed that the most frequent country of origin of imported puppies was Romania. In Bulgaria the research was carried out independently, as part of FOUR PAWS' work against the illegal trade in the country, and is included in the current report to illustrate the problems in Bulgaria, which is a source country for many imported puppies offered for sale in the Netherlands.

The investigations in the UK, the Netherlands and Romania were conducted by TRACKS Investigations Ltd. The research in Bulgaria was conducted by Client X and has already been published in Bulgaria.<sup>13</sup>

## UK and the Netherlands

The objective of the investigations in the UK and the Netherlands was to expose:

- ➔ the scale of imported puppies advertised for sale on online classified ad sites in breach of the existing legislation.
- ➔ the various tricks unscrupulous sellers use to deceive buyers.
- ➔ the ease with which cross-border dealers can evade verification systems and sell a puppy online.

### UK (April - May 2021)

Investigators identified 736 adverts from three major classified ad sites: Gumtree, Freeads and Pets4Homes. Adverts were selected based on the puppy's age (under six months old), and breed of puppy advertised including: Chow Chow, Dachshund, French Bulldog, Maltese, Pomeranian and Pug. These breeds were chosen as they are some of the most popular breeds in the UK. Adverts were selected from across the UK to provide a broad geographical representation of illicit trade.

Sellers were contacted by phone, text and/or online messaging to establish whether the puppies had been imported from outside the UK. Their responses were recorded in writing, and screenshots were taken of relevant adverts and documentation. Nine suspected illegal dealers were identified for follow-up visits in June 2021 based on their patterns of suspicious activity such as the use of multiple identities to place adverts across a range of classified ad sites. Investigators posed as potential customers and covert cameras were used to document the visits and provide direct evidence of the issues raised.

## Netherlands (December 2021 - April 2022)

Adverts were reviewed from two major online classified ad sites: Marktplaats and Puppypplaats and selected based on the puppy's age (under six months old) and breed of puppy advertised including: Chow Chow, Dachshund, French Bulldog, Maltese, Pomeranian, Pug, Chihuahua, and Yorkshire Terrier. Adverts were selected from across the Netherlands to provide a broad geographical representation of illicit trade.

376 online adverts were identified, and sellers were contacted by phone and/or online messaging followed up using text and WhatsApp to establish whether the puppies had been imported from outside the Netherlands. Their responses were recorded in writing, and screenshots were taken of relevant adverts and documentation. 154 adverts were identified as illicit imports, and twelve sellers were contacted to arrange visits. The twelve visits in total were completed across the Netherlands, Germany and Belgium. Adverts were chosen based on breed, age and hallmarks of potential illicit import sales such as lack of information provided, language used, and sellers already known to engage in suspicious activity.

## Romania and Bulgaria

### Romania (April – May 2022)

Investigations in the UK revealed evidence of the scale of puppy imports and confirmed many puppies were being imported from Romania. An investigation was therefore set up in Romania to expose:

- ➔ the business practices related to the conditions in which the puppies were bred.
- ➔ the uncertainty of the origins of these puppies.
- ➔ the health risks that pose a threat to both people and animals from illegally importing these puppies.
- ➔ the practices employed by dealers to bypass regulations in the UK (i.e., obtaining falsified and fraudulent documents).
- ➔ the ease with which cross-border dealers could sell an illegally imported puppy online by bypassing existing laws and avoiding detection by classified ad sites.

Investigators set up a fake puppy dealership so they could engage with potential dealers, vets and transporters from Romania, and expose whether they were exporting puppies from Romania to the UK under the permitted age of 15 weeks. Meetings with dealers, breeders and vets were set up and recorded using covert video equipment.

### Bulgaria (May – June 2021)

The objective of the investigation in Bulgaria was to expose whether the legal requirements for the sale of dogs were being met and aimed to establish:

- ➔ whether puppies were being sold by registered breeders.
- ➔ the age of the puppies being sold and whether they were shown to the buyer with their mother.
- ➔ the welfare and living conditions of the puppies offered for sale.
- ➔ whether puppies had appropriate documentation.
- ➔ whether puppies had been vaccinated.

Posing as puppy buyers, researchers contacted the sellers via telephone to arrange appointments to meet the puppies. In addition, they asked questions about the age of the puppy and the documents and vaccines that would be given prior to being sold, which allowed them to determine whether the legal requirements for sale were met. The investigation was carried out over a month and ads from classified sites were randomly selected. 34 calls were made, of which 24 were followed by a meeting to inspect the puppy being sold. For two of the sellers, more than one meeting for inspection was carried out where investigators posed as buyers wanting to purchase different breeds of puppies from various advertisements.





## Main Findings

The investigations revealed that a substantial number of puppies advertised on online platforms in the UK and the Netherlands have been bred in poor conditions, with many imported illegally. Shockingly, in the Netherlands, more than 40% of surveyed puppy adverts showed tell-tale signs that the puppies had been imported illegally from other countries. In the UK, one third of surveyed adverts were suspected to be selling puppies illegally imported from other countries, reaching almost half of all adverts on one classified ad site.

Investigations also showed that in Romania and Bulgaria, two of the source countries for puppies advertised on classified ad sites, many of the breeders investigated were also operating illegally. Many compromised the welfare of the animals, offered underage puppies for sale, and some were willing to falsify the puppy's documents, even sharing tips on how to bypass existing regulations. More deceptive tactics were observed being used by sellers in the Netherlands and in the UK than in Bulgaria and Romania, where some breeders were open about the bad conditions the puppies were being bred in. In some instances, the higher the price advertised for a puppy, the more deception was involved.

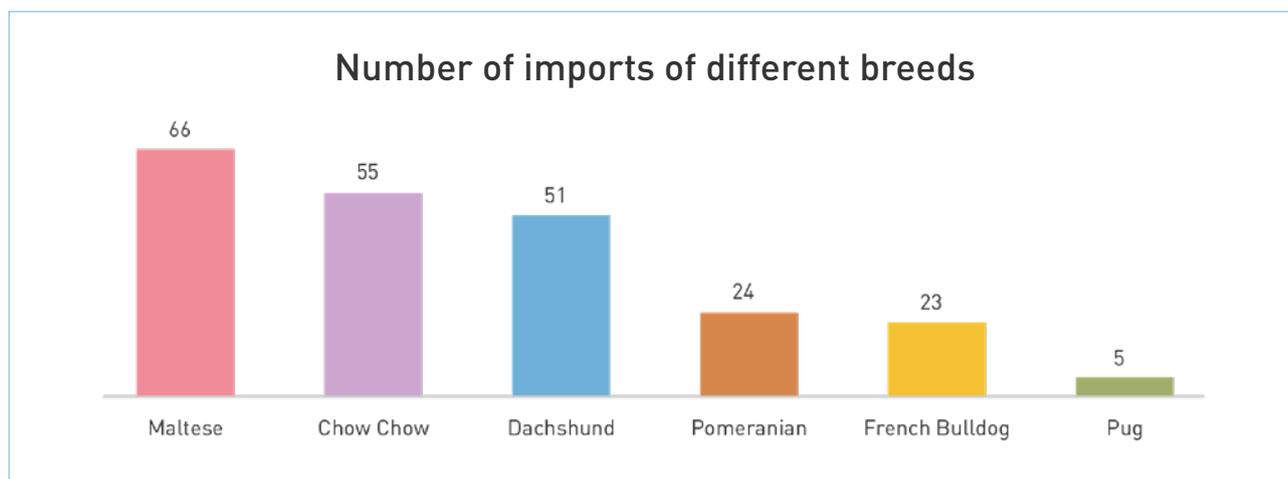
In Romania, more than 80% of breeders investigated mentioned carrying out illegal activities such as providing passports with falsified information, selling puppies under the legal age, and selling unvaccinated puppies. In Bulgaria, 18 of the 19 breeders investigated appeared to be operating illegally.

In all countries where investigations took place, laws and animal welfare requirements were wholly disregarded, and unscrupulous dealers employed a number of methods to deceive buyers.

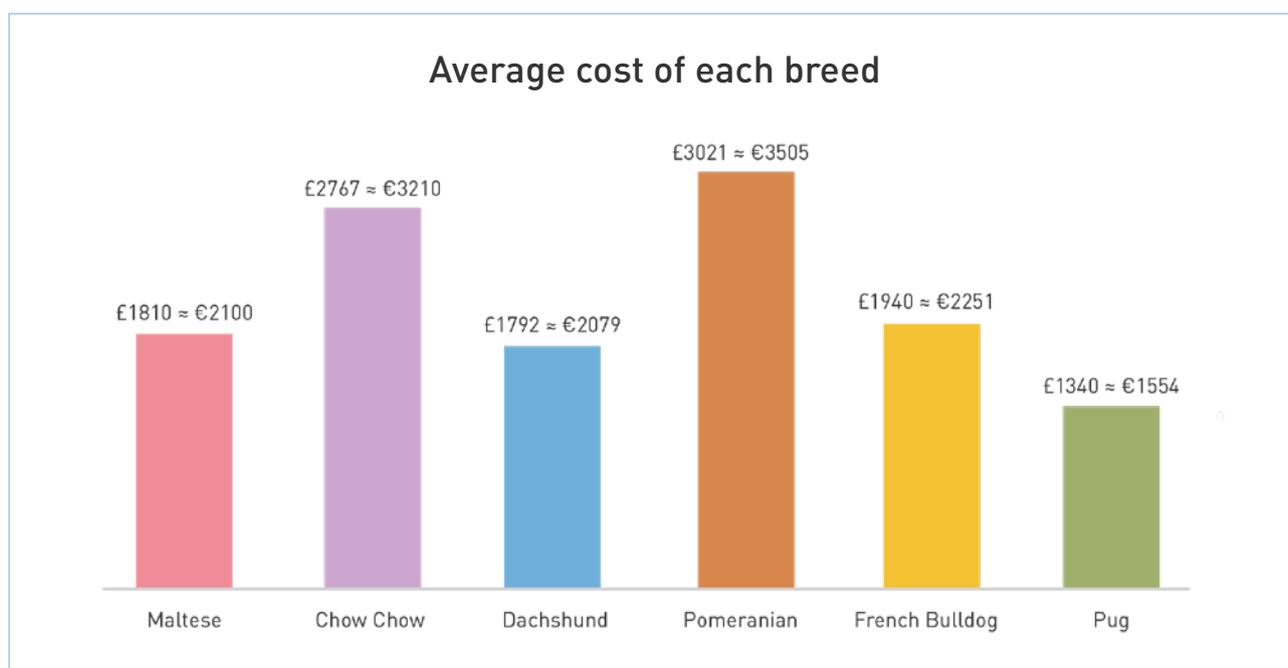
## Puppies advertised on classified ad sites in the UK

Almost a third (224) of the 736 total adverts surveyed were confirmed to be for imported puppies and in clear breach of Lucy's Law. Gumtree had the highest number of imported puppies, with almost half of all surveyed adverts on the site confirmed to be illegal. Confirmation of import was established through the sellers' own admission and with the provision of a puppy passport. Adverts were often duplicated with sellers simply copying and pasting previous advert information, which suggests that classified ad sites are failing to recognise or act upon illicit trade on their platforms. Some sellers tried to sell the same puppy over several weeks whereas others had a continuous supply of new puppies and were trading on a commercial scale.

**Locations of sale:** imported puppies were advertised throughout the UK, with imports from Eastern Europe confirmed in England, Scotland, Wales and Northern Ireland.



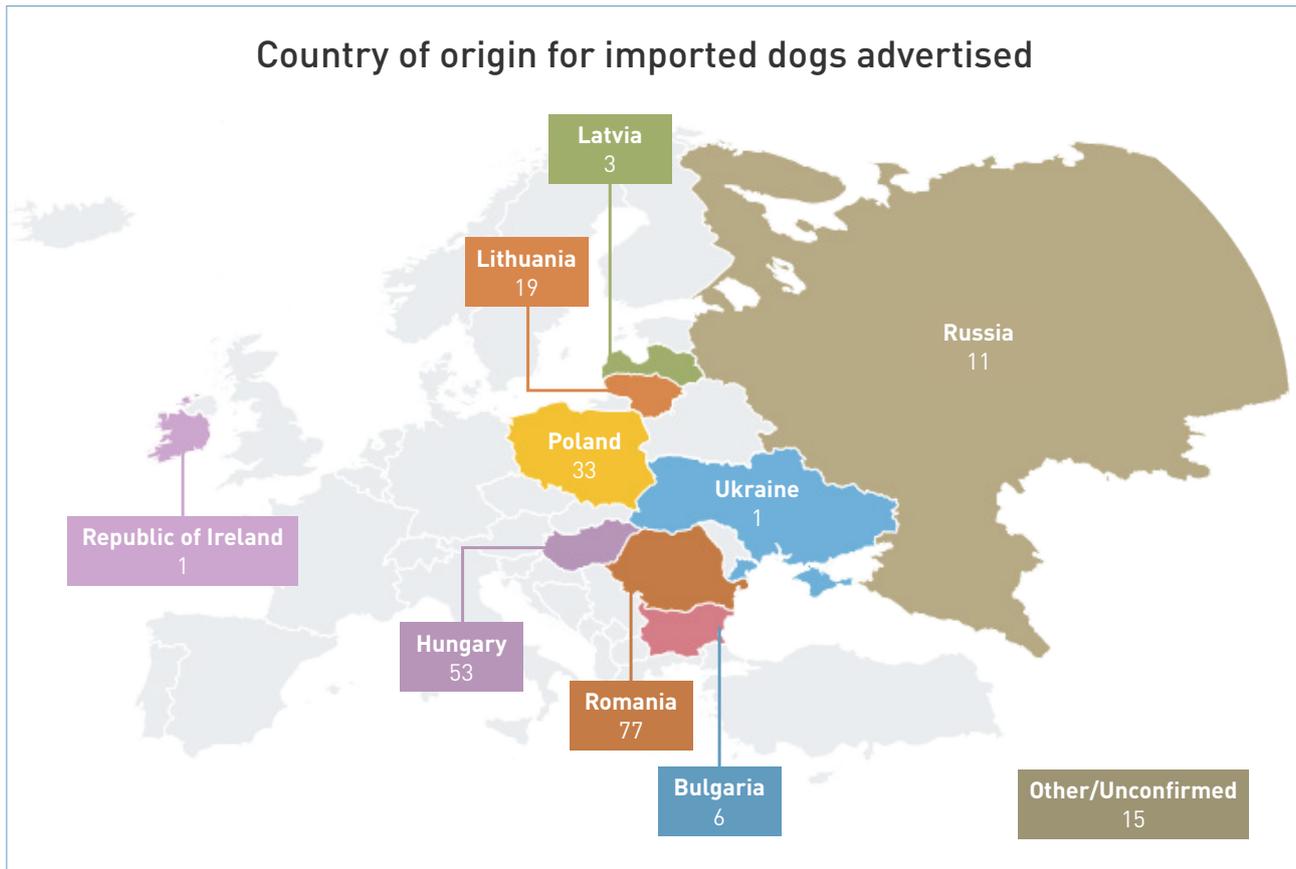
Maltese (66), Chow Chow (55) and Dachshund (51) were the most imported breeds, followed by Pomeranian (24), French Bulldog (23) and Pug (5).



#### Confirmed Imported Breeds by Advertised Price:

Breed	Price Range in GBP	Price Range in EUR
Pomeranian	£1300 - £4500	€1508 - €5222
Chow Chow	£1800 - £4300	€2088 - €4989
French Bulldog	£1400 - £2500	€1624 - €2901
Maltese	£1100 - £2500	€1276 - €2901
Dachshund	£1400 - £2400	€1624 - €2785
Pug	£1250 - £1400	€1450 - €1624

Throughout the course of the six-week investigation, 62 additional instances were recorded of puppies being sold in breach of Lucy’s Law, but without confirmed evidence of illicit import. In most cases, third-party sellers advertised puppies for sale under the age of six months, and after just a few days or weeks of owning them. They offered a variety of reasons for the sale, such as the puppy did not get on well with another pet/ family member, they realised they did not have enough time for a puppy, or because they did not realise their landlord did not allow pets. Some of these puppies may well have originally been imports or these reasons may have been used to deceive buyers. The lack of traceability meant this could not be verified.



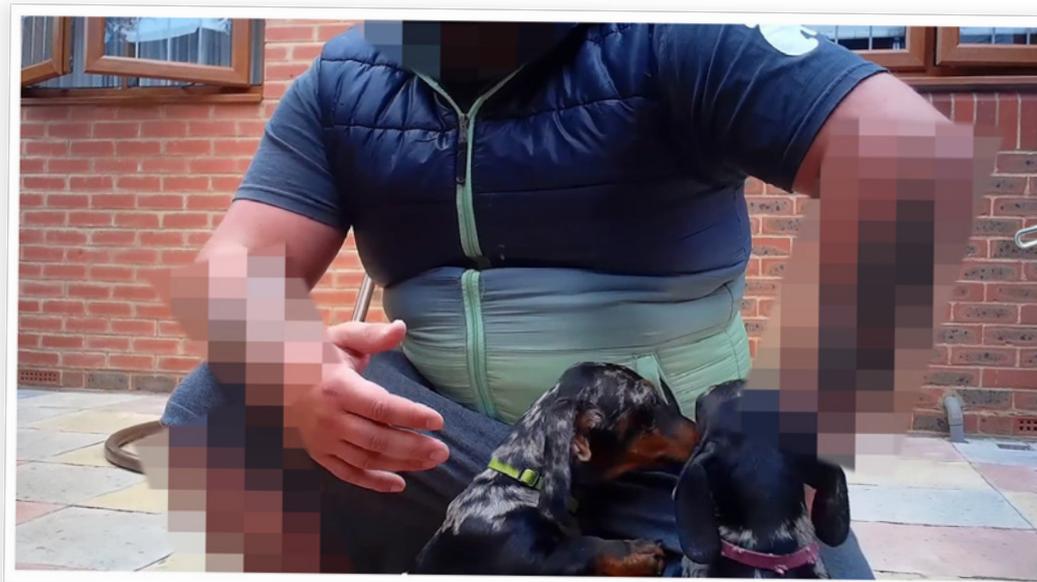
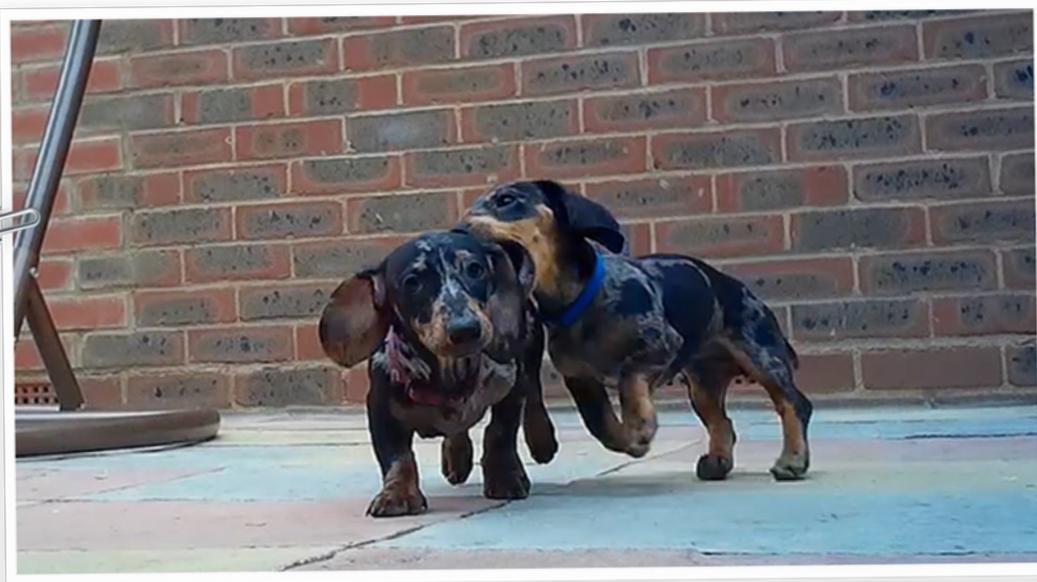
Country	Total	Gumtree	Freeds	P4H
Romania	77	49	14	14
Hungary	53	35	15	3
Poland	33	15	6	12
Lithuania	19	10	6	3
Other/Unconfirmed	15	6	8	1
Russia	11	7	1	3
Bulgaria	6	4	0	2
Serbia	5	3	2	0
Latvia	3	2	0	1
Ukraine	1	0	1	0
Republic of Ireland	1	0	0	1



### Case studies UK: Case 1

## Dealer importing multiple breeds of puppy from Hungary

- ➔ Platforms: Gumtree, Freeads
- ➔ Breeds: Dachshunds and French Bulldogs
- ➔ Origin: Hungary
- ➔ Age: 15/16 weeks old



## Background

A seller with multiple adverts on both Gumtree and Freeads, using four different names. On one advert, the seller could only be contacted via message on the site, whereas on other adverts, a mobile phone number was provided. The seller simultaneously advertised imported Dachshund puppies which were listed as 16 weeks old and French Bulldog puppies listed at just 15 weeks old.

The seller stated that the puppies were bred at their uncle's kennel in Hungary and that they sold lots of puppies due to the high and constant demand in the UK. They claimed that buying a puppy from Hungary ensures a better-quality puppy for a lower price but warned that other Hungarian breeders ran puppy farms and sold their puppies through Romania.

When the investigator requested to visit the puppies, the seller said they were in Hungary collecting their next consignment of puppies and would be available the following week when they would be back in the UK with a fresh litter to sell.

## Laws breached:

- ➔ Importing underage puppies.
- ➔ Advertising underage puppies for sale.
- ➔ In breach of Lucy's Law i.e., the puppy was being sold by a third party, not by the original breeder, and was not with their mother in their place of birth.

## Methods of deception:

- ➔ Use of multiple identities to place adverts across a range of classified ad sites.
- ➔ Mobile phone number was only displayed on some adverts in an attempt to avoid being detected on other adverts selling multiple different breeds of puppy.
- ➔ Warned against other dealers selling puppies 'from puppy farms' in an attempt to make themselves seem trustworthy.



### Case studies UK: Case 2

## Dealer importing and selling multiple breeds of puppies from Romania

- ➔ Platforms: Gumtree, Pets4Homes
- ➔ Breeds: Chow Chow and French Bulldogs
- ➔ Origin: Romania (and possibly Slovakia)
- ➔ Age: 12-20 weeks old



Seller with multiple adverts using four different names and several phone numbers across two classified ad sites. The adverts provided minimal information and ages of puppies ranged from 12 – 20 weeks old. A connection was made between the multiple adverts as the seller's address was used on all of them.

When the seller was visited, he made a great effort to assure buyers that the puppies were healthy and that his business was legitimate. He stated that dealing puppies was his main job and that he had been doing it for almost two years and could provide references from previous buyers. Only Chow Chows were seen during the visit and the seller stated this was the only breed he sold despite the same address being used to sell French Bulldog puppies. The seller was comfortable showing documentation including a quarantine

certificate which listed Slovakia as the country from which the puppies entered Great Britain. He also stated during the visit that the Chow Chow puppies were almost 15 weeks old despite their passports stating they were over 20 weeks old.

The seller was quite brazen about his illegal dealings and made no attempt to conceal the puppy's age discrepancies, suggesting that few customers noticed or questioned it.

The seller said that transporting the puppies was expensive and that a special van was used containing 20 cages for different animals. He said he wants to buy a van so he can transport the puppies himself but said evading the authorities in Dover was difficult.

### Laws breached:

- ➔ Importing underage puppies.
- ➔ Advertising underage puppies for sale.
- ➔ In breach of Lucy's Law i.e., puppy was being sold by a third party, not by the original breeder, and was not with their mother in their place of birth.

### Methods of deception:

- ➔ Use of multiple identities to place adverts across a range of classified ad sites.
- ➔ Mobile phone number was only displayed on some adverts in an attempt to avoid being detected on other adverts selling other breeds of puppy.
- ➔ An affable salesman who could convince unwitting buyers that he was selling puppies legally.

## Puppies advertised on classified ad sites in the Netherlands

Despite the introduction of new legislation to regulate puppy sales in the Netherlands, investigators found an established and substantial supply of unregistered imported puppies advertised on the main Dutch classified ad sites Marktplaats and Puppyplaats. Many of the puppies advertised on these platforms were under the legal age for import, not fully vaccinated against rabies and did not have the required registration documents and passport.

Of the 376 adverts surveyed, 41% were confirmed to be selling illegally imported puppies:

- ➔ 26% of adverts were for illegally imported puppies from Eastern Europe. 17% of these adverts were for unregistered puppies from Eastern Europe advertised as aged over 15 weeks at point of import. 15% were for puppies aged under 15 weeks at point of import from border countries of Belgium or Germany.
- ➔ 9% were adverts for unregistered puppies from Eastern Europe found to be aged under 15 weeks at point of import.





WEBSITE	TOTAL ENQUIRIES	TOTAL ILLICIT ADS for cross border sales	TOTAL ILLICIT EE* IMPORT ADS	Confirmed unregistered EE* import ads aged >15 weeks	Confirmed unregistered EE* import ads aged <15 weeks	Ads for pups aged <15 weeks from border countries (BE/DL)
Marktplaats Total	239	104 (43.5%)	66 (27.6%)	33 (13.8%)	33 (13.8%)	38 (15.9%)
Puppyplaats Total	137	50 (36.5%)	33 (24.1%)	31 (22.6%)	2 (1.5%)	17 (12.4%)
<b>Total</b>	<b>376</b>	<b>154 (41%)</b>	<b>99 (26%)</b>	<b>64 (17%)</b>	<b>35 (9%)</b>	<b>55 (15%)</b>

\*EE = Eastern Europe

There were widespread breaches of the regulations around UBN and RVO registration amongst import dealers enabling them to remain anonymous to buyers. Marktplaats does provide some seller verification via a payment to advertise, however, this can only be investigated by the Netherlands Food and Consumer Product Safety Authority. Information about the origin of the puppies was provided in the advert and it was only disclosed at the seller's discretion. Investigators also found major discrepancies in the puppies' documentation and untraceable microchip numbers meaning that puppies sold online could not be traced to their origins.

Dealers were able to openly advertise underage and unvaccinated puppies on the classified ad sites with some adverts clearly stating that the imported puppy was aged three months or less. On the advert checklist, sellers even left the vaccination box unchecked, meaning that the puppies vaccination status was unknown to buyers.

Sellers admitted in conversation that imported puppies advertised online typically came to the Netherlands via one of three channels:

1. from unidentified breeding kennels in Eastern Europe (either through a dealer in the Netherlands or couriered directly from the country of origin)
2. collected or couriered from large dealerships in Western Europe (primarily Belgium)
3. or through private sales at the Dutch borders with Belgium and Germany.

The range of options available to sellers helps to illustrate just how easily dealers are able to generate cross-border sales and circumnavigate the laws and regulations of each country.

Interestingly, sellers commented to investigators that they asked more questions than other buyers, even basic questions about the puppy and their origin, indicating that both sellers and buyers appear to be casual in their approach, with few questions asked by either side when purchasing a puppy.

Worryingly, sellers were able to place adverts which openly stated that a puppy was not microchipped, was insufficiently vaccinated and/or under the legal age. Such brazen flouting of the law and clear markers of illegal trade on adverts should be picked up by these sites and checked for potential wrongdoing.

Illicit dealers were able to repeatedly place adverts without detection; only 1 out of 154 adverts for illegally imported puppies was seen to be removed by a host site.

Even the most prolific illegal import dealers showing obvious signs of illicit dealing had their ID and bank details verified on their Marktplaats profiles, boosting their appearance of reputability. This highlights an urgent need for sites to implement additional seller verification checks.

Sellers were also able to utilise a range of cross-border channels for import and stated that entry to the Netherlands by road was rarely a problem.

Puppies were regularly sold without Dutch veterinary registration or checks and often with dubious health checks from abroad. Buyers could easily purchase a puppy with undiagnosed health issues. There were also clear discrepancies in sellers' accounts of the puppies' backgrounds, in terms of age and place of origin.

Sellers often claimed their puppies came from a trusted contact or close relative, breeding modestly in their home country. This is highly unlikely as in order to sustain the volume, range and frequency of puppies on offer, puppy farms were most likely the source. With countless unregistered Eastern European breeding establishments, it is impossible for the buyer to know their puppy's true origins and there is a very real prospect that their puppy came from exploited breeding dams.





### Case studies Netherlands: Case 1

## Seller advertising an underage puppy imported from Bulgaria

#### Details:

- ➔ Classified site: Marktplaats
- ➔ Breed: Pomeranian
- ➔ Origin: Bulgaria
- ➔ Age: 2.5 months
- ➔ Sale price: €1,500.



#### Background:

The seller claimed she bought the puppy for herself from her friend who was a “professional breeder”. She supposedly owned the puppy for two weeks and was advertising him for sale because she said he did not get on with her cats. The seller openly stated that the puppy was imported from Eastern Europe at two months old.

The seller said the puppy had travelled for three days from Bulgaria to the Netherlands and was the only puppy on the trip. She said he was “a little bit scared” when he arrived.

The puppy was advertised as 2.5 months old, but according to the passport, the puppy was four months old. The rabies vaccination date was provided but did not state how long it was valid for. When asked about these discrepancies, the seller stated she did not ask any questions about the passport because she “went on trust” but admitted the details must be incorrect.

The seller did not provide an RVO or UBN registration and did not appear to know what they were. She was however aware of the rabies protocol but still attempted to sell the puppy without the necessary vaccination information. The puppy was not seen by a vet in the Netherlands and investigators noticed he had weepy eyes. The seller intended to sell the puppy in the street and did not allow buyers to see the puppy in their home environment.

### Violations:

- ➔ Puppy had been imported from Bulgaria at two months of age, less than the legal requirement of 15 weeks for imported puppies and in breach of the rabies protocol.
- ➔ Passport information did not match details given by the seller.
- ➔ Puppy was not checked by a veterinarian.
- ➔ No RVO/UBN registration provided.

### Methods of deception:

- ➔ Seller met the buyer in the street likely to avoid the buyer asking to see the puppy in their home environment.
- ➔ Seller stated that she did not ask any questions about the passport as she “went on trust” perhaps as a means of avoiding accountability for not ensuring the correct documentation was provided.
- ➔ Seller also said she bought the puppy for herself, he was her first dog, but that her cats did not like him. This was most likely a false narrative to suggest to the buyer that she was not an unscrupulous dealer herself.



## Case studies Netherlands: Case 2

### Repeat importer of underage Pomeranian puppies from Russia

#### Details:

- ➔ Classified site: Marktplaats
- ➔ Breed: Pomeranian
- ➔ Origin: Russia
- ➔ Age: Nine weeks
- ➔ Sale price: €1,500.

#### Background:

The seller stated that the puppies originated in Russia and were transported overland to his Russian contact in Germany at eight weeks of age, before arriving in the Netherlands at 9-10 weeks of age. The seller had no RVO/UBN and said that he worked privately despite admitting that he received weekly imports of puppies.

“We have puppies arriving weekly, and Pomeranians always go quickly”

The seller was very open about his process and use of a false name online. He said he liked to build good relationships with customers and offered to provide other puppies in the future if the current puppy was not the perfect match. By his own admission, the seller claimed to be a regular dealer and gave more details of his trading, stating:

“I am a trader. When you choose a puppy, they will be sent to my colleague in Germany. The puppy goes to the vet for a health certificate, deworming and second vaccine. It’s cheap and takes 10 days with transport”

The seller also advertised a puppy at 12 weeks of age, stating the puppy could arrive in the Netherlands within ten days, at 13.5 weeks of age. He offered more imported puppies at only nine weeks of age, all without a valid rabies vaccination or any RVO/UBN registration.

The puppy adverts stated: “Our puppies are not chipped but we can do that on request.”

### Violations:

- ➔ Selling underage puppies
- ➔ Selling without a valid rabies vaccination
- ➔ Selling without any RVO/UBN registration
- ➔ Providing false microchip details
- ➔ Offered to provide illegally imported, underage puppies in the future.

### Methods of deception

- ➔ Advertising under a false name
- ➔ Attempting to build good relationships with customers to seem trustworthy
- ➔ Claiming that he was a private seller
- ➔ Lying about providing sufficient veterinary checks and vaccination



### Case studies Netherlands: Case 3

## Repeat seller of unregistered Pomeranian puppies from Belarus

#### Details:

- ➔ Classified site: Marktplaats
- ➔ Breed: Pomeranian
- ➔ Origin: Belarus
- ➔ Age: Five months
- ➔ Sale price: €2,150.

Using a pseudonym, the seller advertised 15-week-old Pomeranian puppies imported from Belarus. Adverts were listed in a wide range of locations and adverts with older dates were refreshed to appear new, suggesting the puppy listed may not actually be the one in the advert. The seller also used Instagram to sell puppies but said her account was closed without explanation and that she received hate messages.

Despite the business-like appearance of the seller's operation, the puppies were sold from a small, run-down flat above a vacant shop. Puppies were sold without an EU passport but were provided with a Belarus "Veterinary Certificate for Animal" document. The microchip number provided could not be read. Veterinary paperwork from Belarus does not record rabies vaccinations in the same way as EU passports. It only records the date administered and valid until, not when the vaccination is valid from (21 days after administration). This could enable exporters to transport puppies before the due waiting period. Furthermore, the seller stated her current puppy had been in the Netherlands for one month but had not yet seen a vet there since arriving.

The seller said she had been selling puppies for three years and only ever imported and does not breed them from home. The seller claimed she used a breeder who only allows her bitch to have one litter a year, yet her access to a wide range of puppies of different ages indicated that she had access to far more. The seller was aware of the need to be registered but nevertheless was selling without an RVO/UBN registration. She stated that puppies sold quickly which is why she did not register them herself. The seller stated she would not sell puppies under 15 weeks as this was illegal and explained that she understood the rabies protocol. The seller advised she was completing a diploma in relation to this (details unclear as a diploma is not required to obtain a UBN).

#### Violations:

- ➔ Selling without an EU passport even though this was already mandatory in the Netherlands.
- ➔ Illegible microchip number on documentation.
- ➔ Selling without an RVO/UBN registration
- ➔ Puppy had been in the Netherlands one month but had not seen a vet.

**Methods of deception:**

- ➔ Stated she only worked with one breeder who had one litter per year, however, she regularly advertised puppies so must have had access to various breeders.
- ➔ Used the excuse of puppies selling quickly to justify not registering them herself.
- ➔ When discussing rabies protocol and puppy registration, seller claimed she was completing a diploma, perhaps to appear more knowledgeable and responsible.
- ➔ Stated she would not sell puppies under 15 weeks old as it was illegal but seemed unphased about breaking other laws. Probably said in an attempt to seem trustworthy.



#### Case studies Netherlands: Case 4

### Repeat seller of underage, unvaccinated puppies from Belgium, giving buyers specific advice on how to subvert the rabies protocol

#### Details:

- ➔ Classified site: Puppyplaats
- ➔ Breeds: Pomeranians, Dachshunds and various other breeds
- ➔ Origin: Belgium
- ➔ Age: Nine weeks
- ➔ Sale price: €2,150.



The seller advertised multiple breeds on Puppyplaats under the age of 15 weeks from their breeding kennel in Belgium. They were open about the fact that puppies would not be fully vaccinated at this age but stated that it was “better to buy puppies when they are younger for socialisation and training reasons.”

The seller also explained at length how to get around “stupid laws” on rabies vaccination and offered to sell a puppy at just eight weeks old, saying the puppy could come back for a free rabies vaccination at 15 weeks with their vet. They also advised the buyer to keep the puppy away from the vets in the Netherlands until they were 15 weeks old. They reiterated that they were not selling imported puppies. The seller also offered delivery, meaning puppies would have been delivered to buyers in the Netherlands at just nine weeks old.

The seller bred the puppies themselves and when asked about the stud dogs, said they were kept further away. Some ex-breeding bitches were on sale but were not seen closely. Customers could view the puppies who were kept in a substantial kennel area where mothers and puppies of multiple breeds could be seen in

pens. One of the Dachshund breeding bitches had lost fur down her back, but the seller dismissed questions about this, and another person claimed it was due to lactation and biological resources being diverted to the puppies.

Investigators said that during the visit, a Pomeranian breeding bitch looked very stressed and was trying to protect her puppies from us



Investigators found that this seller was just one of several Belgian dealers offering underage and unvaccinated puppies for sale in the Netherlands.

### Violations:

- ➔ Offered a range of puppies aged under 15 weeks of age imported from Belgium to the Netherlands.
- ➔ Puppies sold without rabies vaccination.
- ➔ Offered specific advice on how to subvert the rabies protocol.
- ➔ Offered a free rabies vaccination via their own vet and advised to avoid seeing a vet in the Netherlands.

### Methods of deception:

- ➔ Attempted to trick the buyer into buying a puppy when they were too young despite the legal regulations.
- ➔ Seller dismissed claims about the health of the Dachshund breeding bitch.
- ➔ Claimed laws around rabies protocol were “stupid” in an effort to dismiss the seriousness of selling unvaccinated puppies.



### Case studies Netherlands: Case 5

## Unchipped and unregistered imported puppy listed for sale with no passport

### Details:

- ➔ Classified site: Marktplaats
- ➔ Breed: Pomeranian
- ➔ Origin: Bulgaria
- ➔ Age: Four months
- ➔ Sale price: €2,000.



The seller offering the puppy listed them as unchipped and unregistered and without required documents such as an EU passport. The puppy was brought to the Netherlands at two months old and had supposedly been given to the seller as a gift, but they were now selling the dog as they had no time for them.

When visited by investigators, the seller was supposedly in Bulgaria at the time, so the visit was facilitated by two women who knew very little about the puppy's vaccination record, yet the puppy had been out in the community and had met other dogs. The puppy was clearly not a pure Pomeranian as advertised but most likely a cross breed.

The sellers said that they could provide pure Pomeranian puppies for around €2,000 yet they did not have an RVO/UBN registration, and no information was provided about the breeder.

**Violations:**

- ➔ Imported a puppy from Bulgaria to the Netherlands under the legal age.
- ➔ Puppy advertised for sale without microchip and registration details, or an EU passport.
- ➔ Unknown vaccination status.
- ➔ Sellers did not have an RVO/UBN registration.

**Methods of deception:**

- ➔ May have used sellers who did not know or pretended not to know any information about the puppy as a means of avoiding answering important questions.
- ➔ Claiming that the puppy was a gift they no longer had time for was most likely a cover story because they were having difficulty selling the puppy. This is especially suspicious considering they offered other puppies for sale.

## Methods of deception

In both the UK and the Netherlands, sellers utilised various methods of deception to operate undetected such as the use of multiple profiles with different identities, providing a false location, and using diversion tactics. Some dealers however, appeared to be genuinely unclear about the legal aspects of selling a puppy, suggesting a significant lack of awareness. Some of the main tricks and themes across investigations in both countries include:

- ➔ **Use of multiple identities** – sellers of imported puppies often used different names and phone numbers to advertise various puppies over consecutive weeks, sometimes across multiple ad sites. This allowed them to maximise their online sales presence whilst minimising their personal exposure, safe in the knowledge that normal buyers would not undertake that level of cross referencing of adverts to check the legitimacy of sellers.

Sellers would often advertise using one mobile phone number and then call using a different one, making it very difficult for a buyer to get in touch with the seller if there was a problem

- ➔ **Evasion** - illicit traders frequently changed the subject when asked specific questions. Discussing a puppy's pedigree was a common diversionary tactic, with an emphasis on the "quality" of the puppy.
- ➔ **Feigning legitimacy** – to reassure potential buyers, sellers would claim that puppy imports were declared on a government website or registered with a specialised pet transportation company. In the UK, one seller claimed to be a registered breeder and only imported puppies due to UK limits on how many puppies can be sold, giving the impression that she was a reputable breeder but was in fact undermining the system.
- ➔ **False claims about rabies protocol** – some sellers would make various claims about rabies protocol to assure buyers that puppies could enter the country under the legal age limit. Buyers were incorrectly told that it was acceptable to import an underage puppy as long as they, for example, stayed indoors, did not have contact with wild animals, or returned to the seller when the puppy was older for a free rabies jab.
- ➔ **False reasons for sale** - many sellers would claim that putting their puppy up for sale was in the best interest of the puppy, or to give them a chance of finding their 'forever home', or that they would have a better life in the UK or the Netherlands.
- ➔ **Selling for profitability**: some sellers were very honest and openly stated that it was more profitable to breed in Eastern Europe and sell in the UK or the Netherlands, demonstrating the ease with which cross border dealers can sell a puppy profitably online.
- ➔ **Passports**: sellers would claim that the puppy's passport was proof of legitimacy and authenticity and that the puppy would not be able to travel without it. Some sellers were willing to provide photos of the passport in advance of a visit; others refused, stating they were wary of "scammers."

In some cases, it was only upon examining the passport that it became clear the puppy was not from the country the seller claimed

- ➔ **Microchips:** sellers were keen to highlight a puppy's microchip as a sign of legitimacy however without registration in a database being confirmed, this could not provide the seller with assurance that the puppy was correctly microchipped and registered.
- ➔ **References from previous buyers:** buyers were offered contact with previous customers who could provide a reference for them, however there was no way of verifying the sources and could ultimately show more examples of the seller's previous lawbreaking.
- ➔ **Claims of quality:** many sellers claimed that their puppies were of 'higher quality'. One seller claimed that buying dogs from Hungary ensured higher quality for a lower price.
- ➔ **Offering delivery of puppy:** sellers of imported puppies were often keen for a quick and easy sale and would offer to deliver the puppy direct to the buyer. This tactic promotes faster delivery without the buyer seeing the puppy first.

Most legitimate sellers will not deliver puppies, and sellers offering to do this should alert buyers to possible illegal trading as this only creates further uncertainty regarding the origin of the puppy.

- ➔ **Paid advertising memberships:** numerous sellers of imported puppies used paid membership accounts on classified ad sites to give their adverts greater prominence on the site and increase the appearance of legitimacy to buyers.
- ➔ **Location deception:** puppies not in the location advertised or the buyer suggested meeting in a public place. This tactic enables the seller to hide their true location and prevents the buyer from seeing the puppies with their mother.
- ➔ **Advertisement for puppies in advance of their arrival in the UK:** this practice illustrates the ease in which cross-border dealers can bring a near constant supply of puppies to the UK. Sellers advertise that puppies can be collected as soon as they arrive in the UK, meaning buyers could collect a puppy straight after a lengthy journey from Eastern Europe, with absolutely no health care or veterinary checks.
- ➔ **Photographs:** often the photos provided on adverts were misleading and did not look like they were taken in the UK. Pictures of the puppies' parents in houses or gardens gave strong clues that the puppy had come from abroad. Sellers also provided photos of the puppy's parents separately rather than photos of the puppy with their parents.
- ➔ **Vet checks:** sellers often stated that the puppy had a full health check before leaving their country of origin, claiming that travel would not be possible without such measures. However, very few had any documentation to prove this.

- ➔ **Puppy shops:** on several occasions, classified ads led customers to puppy shops, either online or in person. Although these traders were operating away from the classified ad sites, they used them as advertisement for their own operation to draw in customers.
- ➔ **Dishonesty around Dutch first owner registration:** in the Netherlands, illicit sellers often stated that registration was the customer's responsibility and/or claimed that registration in the country of origin was sufficient. Several sellers claimed to be registered with the RVO and to have a UBN but would not provide details prior to visit. One repeat dealer falsely claimed that they could not provide the UBN because it would enable anyone else to fraudulently import and register puppies under that number.
- ➔ **False UK Kennel Club Registration:** several UK sellers made false claims that a UK Kennel Club registration application had been made and the paperwork was on the way but had been delayed due to COVID-19. Others promised that UK Kennel Club registration would be quick and easy for the buyer to do.

## Breeding operations Romania and Bulgaria

### Romania

Investigations in Romania have shown that it is common practice for breeders to sell and export puppies to EU countries without EU passports, rabies vaccinations, and even with false records of the puppy's date of birth and rabies vaccinations.

In one shocking case, a vet issued EU pet passports to two puppies with false dates of birth and a false record of vaccinations, all at the breeder's request. The vet gave the investigator the vaccine and said to administer it when the puppies arrived in the UK.

Investigators met with 18 breeders and in many cases, the breeders worked with corrupt veterinarians to obtain passports for underage puppies with fraudulent vaccination records. The breeders said they did not regularly import puppies to sell in the UK on a large scale. However, they said they often sold puppies to Romanians living in Europe who returned to Romania, and then transported the puppies home themselves, sometimes buying a few puppies at a time. This explains the presence of several sellers in the UK who commented that they were not commercial sellers of puppies but occasionally had Romanian puppies for sale.

Twelve of the eighteen breeders visited offered to supply EU passports with falsified data to allow transport of underage puppies to UK.

The investigation has also shown that by offering to sell non-pedigree puppies, most breeders did not comply with Romanian legislation which only allows the sale of pedigree puppies. When asked about kennel registration, most breeders admitted they were unregistered or had different interpretations of the current legislation, which resulted in them not being registered. The investigation made it quite clear that no one was fully complying with legal requirements.

Five of the eighteen breeders said they often sell puppies without a passport to EU countries, or sell them with a passport, but without a record of their rabies vaccination.

Investigators visited a veterinarian who issued EU passports for puppies traveling to the UK in full knowledge that the puppies were too young to be issued legal travel documents. He falsified most of the passport data including a false declaration that vaccination against rabies had been administered. He also recorded that the puppy's date of birth as six weeks earlier and recorded false information about worming treatment and clinical examination. The veterinarian recommended that the puppies should not be vaccinated at such an early age and gave two bottles of rabies vaccine for the investigators to administer themselves when they arrived in the UK.

Only three of the eighteen breeders did not mention any illegal activity in selling puppies to the EU or the UK. Most of the breeders were in breach of Romanian law prohibiting the breeding of non-pedigree dogs. According to Romanian law, all non-pedigree dogs must also be sterilised unless they belong to a specific breed, as proven by an official document from a dog breeding association. Most of the breeders were also in breach of Romanian law requiring breeders to be registered by the relevant authorities.

Investigators also found that breeders had circumvented temporary regulations put in place prohibiting the commercial movement of puppies to the UK from countries bordering with Ukraine (including Romania) for one month from April 14th to May 14th 2022. A couple of breeders suggested a way around this restriction was to smuggle puppies to Hungary and then obtain EU passports and register them in Hungary.

One breeder admitted that sedatives could be given to puppies during transit to help keep them hidden when going through borders. One breeder told investigators in detail how this could be done when transporting puppies to the UK.

Shockingly, the investigation has found that many breeders bypass the Pet Travel Scheme altogether and export puppies throughout Europe without passports. It has demonstrated the ease in which breeders can purchase passports for underage and even absent puppies with fraudulent vaccination records.

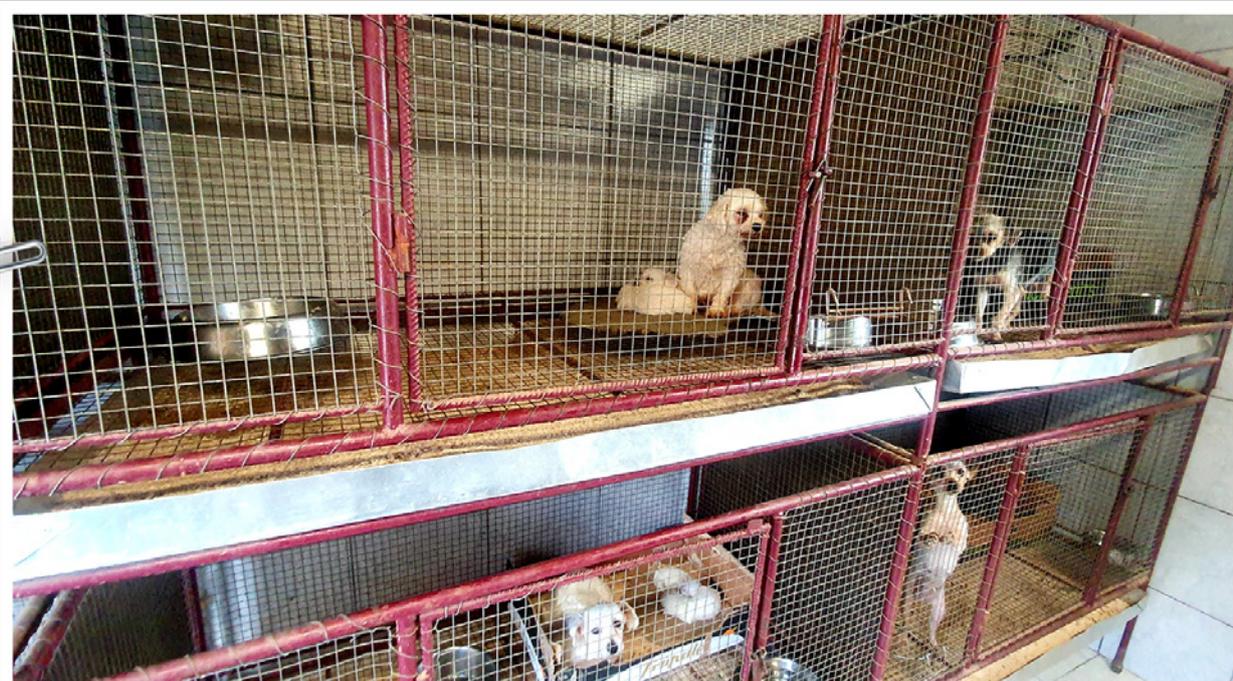


### Case studies Romania: Case 1

## Breeder of multiple breeds selling underage puppies with falsified documents

#### Details:

- ➔ Breeder/exporter
- ➔ Breed: Bichon Frise, Yorkshire Terriers, Shih Tzu, German Shepherds, and non-pedigree cats
- ➔ Age: few days old – 10 weeks old
- ➔ Sale price: Yorkshire terriers €500, Bichon, Shih Tzu €250 without passport.



Investigators were shown around kennels housing multiple puppies aged from a few days old to 10 weeks. The dams with pups were all caged inside the building and other dogs were kept in outside kennels in groups. Investigators were told the dams were bred from until they were 5-6 years old before being donated.

#### Breeder's kennels

The breeder offered two puppies that could be taken at nine weeks old and another two puppies that were younger but would be ready for sale two weeks later.



The breeder stated that anyone can take a puppy to other European countries without a passport or vaccinations as no one will check. He said he had a vet that could supply passports for puppy export with false birth dates at a cost of €50 per passport, but if the rabies vaccination was included in the passport, it would cost an additional €100. It would cost more because the vet had to put his name on the passport and he would be taking a greater risk and therefore wanted more money for this service.

Investigators were also told that the rabies vaccination would not be given, only the veterinary stamp would be present in the passport. He was very keen to have a regular trade and said he could supply puppies on a monthly basis.

### Violations:

- ➔ Selling puppies under the legal age.
- ➔ Selling non-pedigree puppies.
- ➔ Selling unsterilised puppies.
- ➔ Selling unvaccinated puppies.
- ➔ Offering to falsify legal documents.

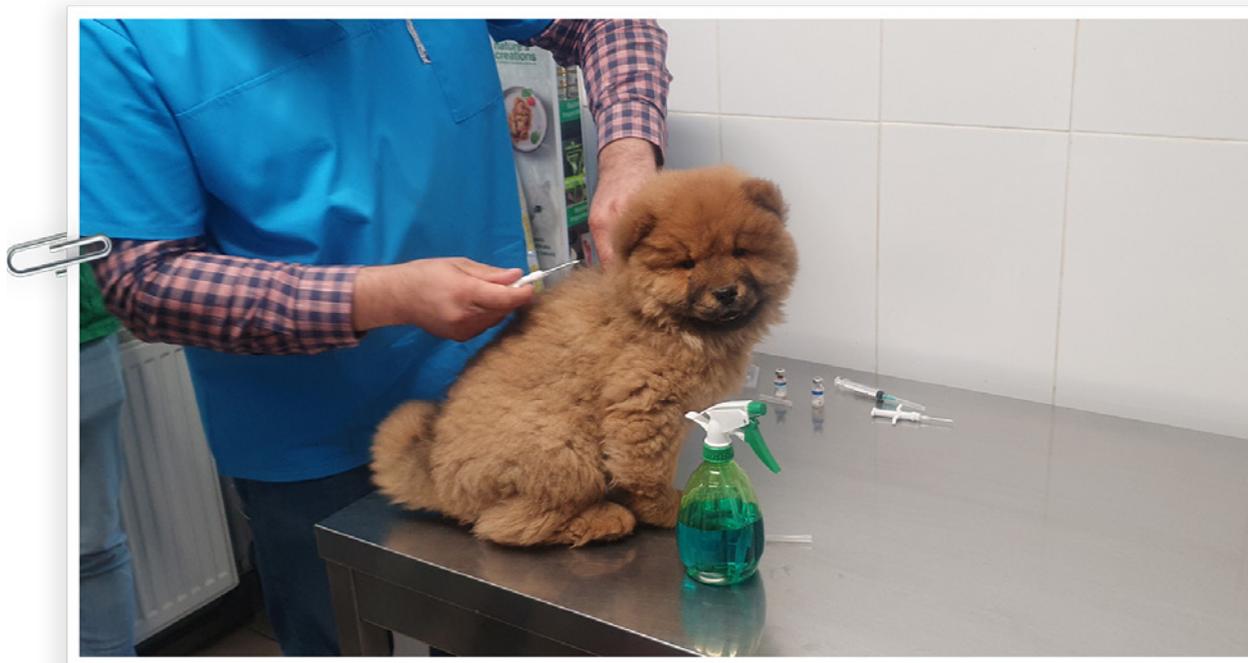
### Methods of deception:

- ➔ Implying that it was easy to take puppies across Europe illegally to downplay the seriousness of his actions.



## Case studies Romania: Case 2

### Veterinarian forging legal documents



A breeder took investigators to meet a vet who could supply passports for Chow Chow puppies which were only 10 weeks old. He said he would falsify the birth data in the passport records so they could travel to the UK with the correct documentation. He said he required the specific date of travel so he could adjust the vaccination dates in the passports accordingly. The passports cost €60 each and the vet would only meet the breeder and investigators outside of the surgery.

The seller said he would give the puppy some vaccinations but would not vaccinate for rabies. Instead, he offered to provide the buyer with the rabies vaccination to administer themselves on arrival to the UK.

The breeder returned with the Chow Chow puppies and the vet gave them vaccinations, microchips and issued them with EU passports along with vials for the rabies vaccinations. The puppies' date of birth in the passport were made older by six weeks.

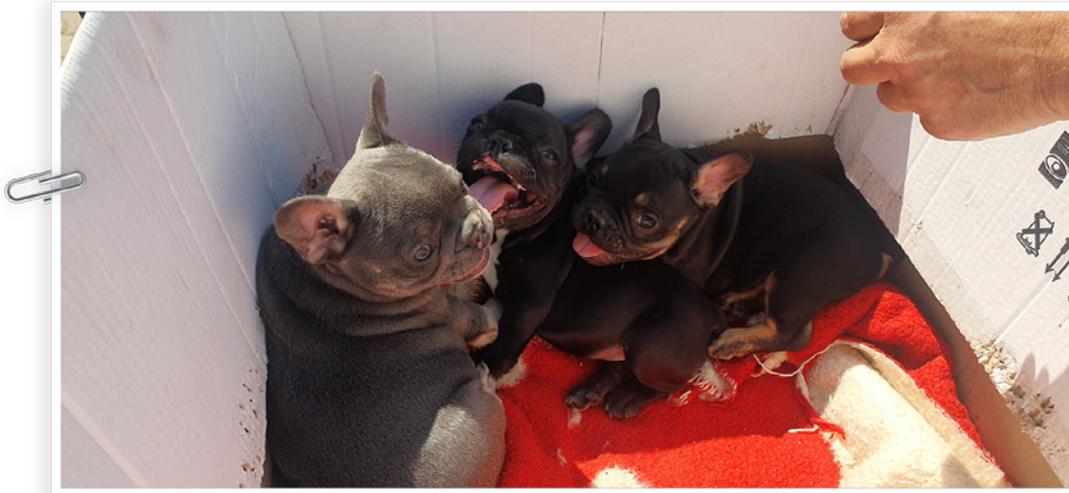
#### Violations:

- ➔ Falsifying legal documents.
- ➔ Exporting underage puppies for sale.
- ➔ Not vaccinating puppies for rabies prior to travel.



### Case studies Romania: Case 3

## Breeder selling underage French Bulldog puppies with falsified passports



### Details:

- ➔ Breeder
- ➔ Breed: French Bulldogs and other breeds
- ➔ Age: 10 weeks and 12 weeks
- ➔ Sale price: between €300 and €1200 depending on colour.

The breeder stated that he only had a couple of litters a year and was not registered as a breeder. He said he could organise passports the following day with a false date of birth and had sold puppies to the UK before. He would only allow one investigator to visit the vet with him because he was concerned that they could be journalists.

The breeder seemed to be aware of the dangers of dealing with people that might not be who they said they were. He said that the passports would cost €50 each. When the investigators left, the breeder phoned them to verify whether they were genuine buyers and asked their translator how well he knew them and if they were real buyers or not.

### Violations:

- ➔ Selling non-pedigree puppies.
- ➔ Selling puppies under the legal age.
- ➔ Falsifying legal documents

### Methods of deception:

- ➔ Suggesting that by only selling a few litters a year that he was a responsible breeder.



### Case studies Romania: Case 4

## Breeder selling non-pedigree dogs bred in poor conditions



### Details:

- ➔ Breeds: non pedigree Yorkies, Dachshunds, French Bulldogs and German Shepherds.
- ➔ Age: under 12 weeks

Investigators described the breeding kennels as a typical “Puppy Mill” with many puppies for sale. The kennels were run down, dirty and had a terrible smell. The breeder said he could supply puppies on a regular basis. He took investigators to another house where they were shown many more puppies and breeding dogs.

The breeder also said he sold puppies to Romanians who took them out of the country without any documents or passports. He also said that if investigators wanted to buy young puppies under the age of 12 weeks, then he would be able to find a vet that would help them.

### Violations:

- ➔ Selling non-pedigree dogs.
- ➔ Selling puppies under the legal age.
- ➔ Selling unsterilised dogs.
- ➔ Offering to use a vet to falsify a puppy’s age on documentation.

## Bulgaria

Investigations in Bulgaria conducted in 2021 revealed significant inconsistencies with the legal requirements for breeding and sale of dogs:



- ➔ Of the 24 breeders visited by investigators, only two were registered kennels but even those showed inconsistencies with legal requirements for the identification and/or vaccination of dogs.
- ➔ Across the different kennels, 14 different breeds of puppy were offered for sale at prices ranging from BGN 90 (€46) to BGN 2,500 (€1278). Meetings often took place in the seller's home, in a parking lot or in the street. Four sellers sold dogs from their home, and the rest were in a cage/basket, in the seller's car, or in a box in the trunk of the car.
- ➔ At 18 of the 24 visits, puppies were advertised for sale at only 40 - 60 days old.
- ➔ At 16 of the visits, sellers said the puppies could be taken home immediately, and in 11 of the cases the mother was not present.
- ➔ Almost a third of all inspections found that puppies were unvaccinated.
- ➔ 19 of the 24 visits found buyers were not provided with the required documents.
- ➔ 21 of the 24 visits found that puppies were not microchipped.
- ➔ 10 of the 24 visits found that puppies were being sold without a passport.
- ➔ Only 2 of all 24 meetings took place in a registered kennel.
- ➔ 23 out of 24 inspections carried out revealed a visible violation of the minimum age, registration and identification or vaccination of the puppy being sold.
- ➔ Nearly a third of visits found that puppies were unvaccinated. Puppies had all the necessary vaccines in only three of the cases.
- ➔ The majority of inspections found no proof of registration of the dog or breeder, passport or microchip.
- ➔ One dealer had over 60 ads for puppies on one site alone and confirmed that they kept at least 20 puppies of different breeds in boxes in the corridor of an apartment.



### Case studies Bulgaria: Case 1

Seller advertising multiple different breeds of dogs online with a profile displaying a fake animal breeding establishment number

#### Details:

- ➔ Breeder
- ➔ Breed: multiple
- ➔ Age: six weeks
- ➔ Sale price: €600 - €750

When investigators contacted the seller regarding an ad for Pomeranian puppies, the seller stated that the puppies were from three different mothers, weaned and ready to be taken as soon as possible – they were only six weeks old. The seller’s full address was not provided and only when investigators were nearby did they provide more detailed information.

The seller waited for the investigator out on the street in front of a block of apartments. The seller stated that they could go to a veterinarian they knew to register that the puppies already had a second and a third vaccine and were ready to travel, although they had only had their first vaccine. The puppies were kept in a small apartment which could only be seen from the corridor.

There were at least 20 dogs of different breeds placed in boxes including Pinschers and Cocker Spaniels. The dogs looked scared and kept crying.



The dogs did not have passports, microchips, or pedigree certificates. No documents were provided, and the mothers could not be seen.



A different investigator met with the seller, who this time chose to meet at a railway station to offer another puppy. When they met, there were four puppies in a box in car trunk and one of the puppies had running eyes. The seller said the puppies had their first vaccine and it was too early for the second one. The seller said the puppies did not have passports and incorrectly told the buyer that the passport should be issued by the new owner. The puppies were not microchipped.



### Legal violations:

- ➔ Offering to pay a veterinarian to falsify vaccination status and documents.
- ➔ Offering underage puppies for sale.
- ➔ Puppies kept in poor conditions and in poor health.
- ➔ Puppies were not microchipped.
- ➔ No puppy passports provided.
- ➔ Selling underage puppies and puppies in poor health.

### Other issues identified:

- ➔ Advertising various breeds of puppy without their mother.
- ➔ Advertising underage puppies for sale

### Methods of deception:

- ➔ The seller avoided showing the buyer the real conditions the puppies were kept in by only agreeing to meet in a public place.
- ➔ Advertised puppies for sale using a fake breeding establishment number.
- ➔ Incorrectly claimed that the puppy passport should be issued by the new owner.
- ➔ Did not provide any identifiable information that would help the buyer to trace seller i.e., address.

When asked, this seller and others in Bulgaria were also prepared to sell young puppies with falsified documents for transporting abroad.

# Conclusion

Until stricter regulations of the breeding and trade of dogs are in place and enforced, the illegal puppy trade will continue to be an attractive option for unscrupulous breeders and dealers wanting to make a profit. Extensive evidence of the scale of puppy imports, breaches of regulations and the tricks sellers use to deceive buyers demonstrates the urgent need for tougher online trade regulation across Europe, and EU-wide identification and registration of dogs.

Illicit dealers bank on buyers not asking too many questions about a puppy's vaccination documents, age and background. These sellers know they can post a cute puppy for sale on various online channels such as classified ad sites, without the necessary information, and have multiple buyers approach them. Unscrupulous dealers rely on the fact that presumably few customers know what the laws even are, let alone whether they would go to much effort to check or verify important information.

With such alarming numbers of unvaccinated puppies bred in poor conditions being exported underage across Europe, we can expect to see many more puppies with medical and behavioural issues in the future. New owners will pay both an emotional and financial price for their purchase whilst illicit dealers will continue to profit from their exploitative trade. Also, as puppies continue to be imported without effective vaccination, the risk of transmission of zoonotic diseases and even the possibility of rabies transmission remains a serious public health risk.

## The role of puppy buyers

Buyers need to be aware of the risks associated with the illegal puppy trade and should know how to avoid dodgy dealers. Buyers must take every effort to ensure they purchase a puppy from a reputable breeder, that the puppy is kept in appropriate conditions, and that they see the puppy with their mother in the place they were bred. Nevertheless, it cannot be expected that buyers should be able to identify all illegal activity and robust measures should be put in place to protect consumers by both classified ad sites and responsible authorities.

## The role of classified ad sites

Classified ad sites are failing to recognise or act upon the advertising of illegally bred and imported puppies by illegal dealers. These dealers continue to evade detection despite seller verification measures having been implemented on several sites. This highlights that seller verification measures alone are ineffective and that verification of a dogs' registration with their owner is imperative to achieve full traceability.

## The role of decision-makers

The role of decision-makers is key to ensuring harmonised regulation of the puppy trade and enforce it. These puppies are living, breathing, sentient beings, and should be afforded the protection they deserve, as well as the people who fall victim to this cruel trade. This investigation has provided further evidence to demonstrate to legislators the urgent need for meaningful legislative change to help deter the illegal cross border trade of puppies.

# Recommendations

**Improved buyer awareness** – it is imperative that puppy buyers are aware how to avoid illegal dealers and have a good understanding of what to look out for in order to better identify suspicious adverts. Further resources on the topic can be found here:

- ➔ [Cute. Quick. Sick. website](#)
- ➔ [Pandemic Pups Report](#)
- ➔ [Tracing the Trade website](#)

FOUR PAWS' reporting tool allows victims and witnesses of the illegal puppy trade to record cases of unlicensed breeders, of illegally imported and sick puppies to help bring the cruel puppy trade to an end. You can share your experience with FOUR PAWS by visiting [www.four-paws.org/stop-illegal-puppies](http://www.four-paws.org/stop-illegal-puppies)

Since its launch in 2021, FOUR PAWS has received over 3,000 reports of suspected illegal puppy trading activity via the tool.

**Increased traceability** – the lack of controls on classified ad sites, including the ability for sellers to create multiple online profiles and sell puppies with unverified registration status, enables puppy dealers to sell without accountability. FOUR PAWS recommends increased traceability by implementing the Model Solution principle which includes:

- ➔ **Mandatory Identification and Registration (I&R) of dogs EU-wide and in further European countries**

Every dog in Europe needs to be identified and traceable through their registration in a pet registration database. Registration databases should hold safe and reliable information about a dog and their keeper, starting with the person who bred the dog and all other stakeholders and subsequent owners/keepers. These databases should ideally also store information about whether a dog's breeder is officially registered, and their registration number.

EU countries should ensure they are members of pet database connectivity initiatives such as Europetnet. This would enable a dog's microchip registration to be traced in any European country back to the database where the dog was originally registered.

- ➔ **Regulation of the online puppy trade, ensuring that only registered dogs can be advertised by their registered keeper, EU-wide and in further European countries**

**Regulation of the online puppy trade should include verification of a dog's microchip registration with the person advertising them for sale, and ideally, a verification of the dog's breeder registration.**

Verification of pet microchip registrations is already possible as showcased by the VeriPet pilot project. This verification can be achieved with Application Programming Interfaces (API) that verify a dog's registration with the advertiser based on the dog's microchip details. This verification enables an advertiser's traceability via the dog's microchip number in the database which is stored with the required information to enable identification of the dog's keeper.

- ➔ **Pet registration databases and pet passports need to serve as a safe source of reliable information about each dog throughout their entire lifetime.**

Updates to the EU pet passport system are required so that a puppy cannot obtain a passport unless they are microchipped and registered to the person who bred them. It is essential for international traceability that the information in the database includes reliable information about a dog's breeder (and other subsequent keepers). Linking the issuance of a pet passport to a mandatory dog registration directly to the breeder would help to ensure traceability, even without a dog's paper passport, helping to enforce existing registration laws.

The use of databases and electronic pet passports that link a dog's microchip number, vaccination record, health and treatment information is highly recommended. This would significantly eliminate the opportunity for document forgery and routine passport replacement which can leave a dog untraceable and with unknown health status.

**Enforcement** – although many of the practices revealed in this report are illegal, the lack of enforcement and sufficient sanctions for illegal dealers enables them to continue their lucrative illicit dealing. Additional resources and cross-border cooperation is needed to enforce the implementation of the existing regulations.

FOUR PAWS has published a **report with recommendations to enable a safer online puppy trade based on dog identification and registration**, which can be found here: (<https://www.four-paws.org/campaigns-topics/topics/companion-animals/tracing-the-trade>)

**FOUR PAWS calls on decision-makers in Europe, at both the EU and country level, to urgently legislate to regulate the online trading of dogs, and to better enforce existing laws. Until further regulation is implemented, buyers must ensure they carry out sufficient research when choosing a puppy and remain alert to unscrupulous practices.**

# References

- 1 A classified ad website 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.
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- 8 European Commission, Analysis of the results of the EU Coordinated Control Plan on online sales of dogs and cats (2019) [https://ec.europa.eu/food/animals/welfare/other\\_aspects/online\\_dog-cat\\_en](https://ec.europa.eu/food/animals/welfare/other_aspects/online_dog-cat_en)
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- 11 [https://food.ec.europa.eu/safety/eu-agri-food-fraud-network/eu-coordinated-actions/illegal-movement-pets\\_en](https://food.ec.europa.eu/safety/eu-agri-food-fraud-network/eu-coordinated-actions/illegal-movement-pets_en)
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- 13 Dog breeders and importers must register with the Netherlands Enterprise Agency (RVO, in Dutch). They will then receive a Unique Company Number (Uniek Bedrijfsnummer, UBN) which is needed to register and microchip a dog, and to apply for a European pet passport. (<https://business.gov.nl/regulation/registering-dogs-and-pet-passports/>)
- 13 After November 2021, a dog can only be sold or transferred in the Netherlands only if they are chipped, registered with the responsible national authorities and have an EU passport. (<https://www.four-paws.org/our-stories/blog-news/2021-a-good-year-in-the-fight-against-the-illegal-puppy-trade>) The investigation took place shortly after the legislation came into force.

# FOUR PAWS' Illegal Puppy Trade Campaign

FOUR PAWS' goal is to transform the online pet trade into a transparent and accountable one, by making the people who sell puppies online traceable, and therefore accountable for their businesses. FOUR PAWS has worked with key industry stakeholders to develop a software interface which helps to verify whether a puppy has been microchipped and registered to an identity-verified seller (VeriPet) on classified ad sites.

For more information on the requirements for an efficient online trade regulation please read the Model Solution Report which you can find under this link. (<https://www.four-paws.org/campaigns-topics/topics/companion-animals/tracing-the-trade>)

## About the Cute Quick Sick campaign

In 2022 FOUR PAWS launched an international public awareness campaign targeting potential puppy buyers to raise awareness of the risks of buying a puppy from the illegal and unscrupulous puppy trade. This campaign aims to reach potential puppy buyers before they buy a puppy online, to show them the risks associated with buying online and provide them with the information and resources they need to buy a puppy responsibly.

You can find more about the campaign and how to acquire a puppy responsibly here: [four-paws.org/buying-a-puppy](https://four-paws.org/buying-a-puppy)

## Acknowledgements

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The research in Bulgaria was conducted by Client X and has already been published in Bulgaria in the "FOUR PAWS study of the illegal puppy trade in Bulgaria in 2021".

The report has been drafted by Carly Halliday on the basis of investigation reports and findings.

## Disclaimer

FOUR PAWS does not claim that the sample of classified ads used throughout this report is representative of all puppy sales online. However, it is indicative of the large number of ads that are still being published on major classified ad sites in the UK and the Netherlands and of the large number of breeding operations in exporting countries where dogs are bred in a cruel way.

This report was published a year after the last of the investigations were completed. Many of the case studies included in this report have already been reported to national and EU control bodies, including as part of the European Coordinated Control Action Plan on the illegal trade of pets, launched in July, 2022.

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## 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, the organisation advocates for a world where humans treat animals with respect, empathy and understanding. FOUR PAWS' sustainable campaigns and projects 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, France, the Netherlands, Switzerland, South Africa, Thailand, the UK, the USA, and Vietnam as well as sanctuaries for rescued animals, FOUR PAWS provides rapid help and long-term solutions to address animal welfare issues.



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