



# Illegal trade of cats & dogs EU enforcement action

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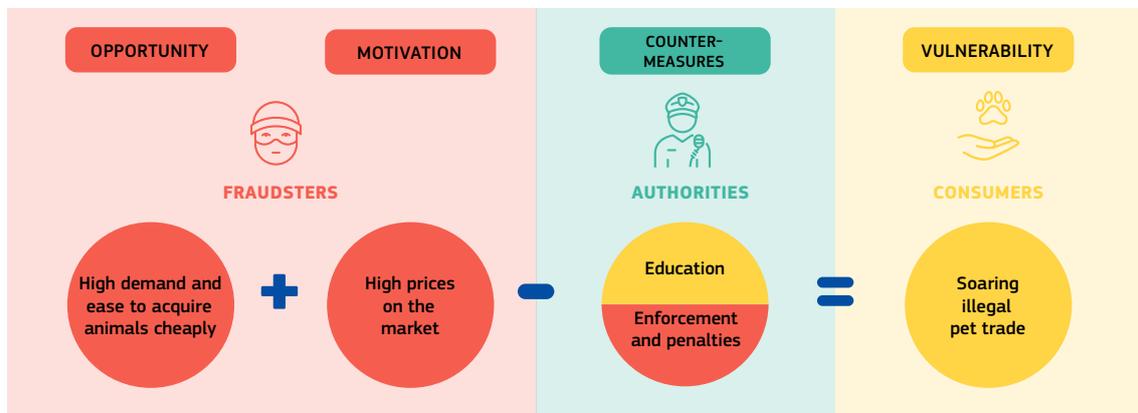
*This report provides a summary of the experiences acquired through voluntary participation by EU and EFTA Member States during a specific timeframe as part of an EU enforcement initiative. Its objective is to illustrate instances of fraud, with a specific focus on trade in cats and dogs, while acknowledging that it may not comprehensively represent the entire sector.*

# 1. INTRODUCTION

The breeding and trade of cats and dogs within the EU is a profitable economic sector, valued at over EUR 1.3 billion annually. Fraudulent activities in this field undermine the economic dynamics of the sector, jeopardise animal health and welfare, and raise concerns about safeguarding public health against zoonotic diseases.



The susceptibility of fraud in the trade of cats and dogs results from a combination of several factors. Foremost, the high prices and the ever-increasing demand for companion animals create a strong financial incentive for unscrupulous operators. This is further fuelled by the relative ease of obtaining inexpensive animals in large quantities from dubious sources, which, when combined with lenient penalties for those engaged in fraudulent activities, significantly weakens deterrence. In addition to the monetary motivations, the lack of readily available information for consumers exacerbates the problem as it leaves potential buyers uninformed and vulnerable to deceitful practices. Moreover, the insufficient enforcement of existing regulations within the sector, coupled with limited resources and expertise, contribute to an increased vulnerability of this sector to fraud and contribute to illegal trade of cats and dogs all over Europe. Online platforms offer a convenient way to the market, so illegally bred and traded animals are advertised next to animals by compliant sellers. The adaptability of sellers and volume of advertisements – with an [estimated](#) 438 000 dogs and 80 000 cats offered at any given moment in the EU make fraud difficult to detect.



Caption: Graph 1 - Vulnerability scheme for illegal trade of cats and dogs

The matter of pet trade is not new but a recurring and persistent one, and has already been discussed and addressed in the past few years in the EU. In 2015, the Commission published a [Study report \(Summary\)](#), which identified the need for Member States to enforce EU and national legislation and to exchange knowledge in the field of companion animals involved in commercial practices. In 2017, the Voluntary Initiative Subgroup on the Health and Welfare of Pets in Trade was established under the Commission's Expert Group [EU Platform on Animal Welfare](#) with the aim to promote better protection for cats and dogs involved in trade. Its work focused on issues pertaining their breeding, socialization, transport, and trade, notably online, areas for which guidelines were produced and disseminated. In 2018, the first enforcement activity focusing on sales of dogs and cats took place. [Commission invited the EU countries](#), on a voluntary basis, to perform a check of online advertisements suspected of non-compliance with EU or national legislation. The aim was to help EU countries to gain insight into possible fraudulent practices. This exercise unveiled

occurrences of misconduct in the online pet trade, witnessing the sale of underage, unvaccinated animals, cases of fake identification documents, cross-border trafficking, as well as inconsistencies between traders' status and volume of activities, to mention but a few. The challenges associated with better checking and controlling the market, for reasons like the multitude of platforms and lacking information in the ads, were also raised.



A report from Eurogroup for Animals, [Illegal Pet Trade: Game Over](#), introduced some of the major points of how to make the pet trade across Europe safer, taking stock of the contribution of experts in the fields of animal health, welfare and traceability, consumer protection, and government revenue management. The report highlighted the need of reliable traceability in trade of animals, importance of consumer protection and problems arising from online sales of dogs and cats.

The European Parliament (EP) has called for measures to address the illegal pet trade, notably, through the introduction of a harmonised system for the identification and registration of cats and dogs in databases that are interoperable, including with a [Resolution in 2016](#). More recently, in 2020, the EP adopted a [resolution](#) on protecting the EU's internal market and consumer rights against the negative implications of the illegal trade in companion animals. The EP called on the Commission to draw up a cross-sectoral EU action plan to address the illegal trade in companion animals in the EU to protect animal welfare, consumers and public health, also bringing to the attention the issues related to online advertising and stressing the need for minimum validation checks. 2020 also saw the establishment of the Working Group on Companion Animals, under the Parliament's Intergroup for the Welfare and Conservation of Animals.

These calls are reflected in the [communication](#) on the EU Strategy to Tackle Organised Crime 2021-2025, where the European Commission recognised illegal trade of companion animals as organised crime, which continues "often on a large scale and sometimes with potential devastating consequences" and were translated in an EU enforcement action involving the European Commission and the EU/EFTA (the European Free Trade Association) countries.

## 2. THE EU ENFORCEMENT ACTION

The EU action ran from July 2022 to July 2023 and was coordinated by the Commission Directorate-General for Health and Food Safety within the [EU Agri-Food Fraud Network](#).

The action aimed to detect irregularities and falsification of the official documents accompanying pet animals (passports, rabies test reports and health certificates), target undeclared and unregistered sales and deter illegal trade through reinforced checks at EU borders and later within the EU. In doing so, it contributed to protecting the health of pet animals and public health (mainly as regards the rabies risk).

Given that organised, cross-border networks are involved in the pet trade, a pivotal aspect of these multifaceted efforts revolved around strengthening cooperation and administrative support among various services at both the national and EU levels. The overarching goal was to facilitate and increase cross-border cooperation, promoting a smooth exchange of information among all relevant authorities across Europe to reinforce the control efficiency. Animal health and welfare authorities in Member States, especially if they do not have investigative powers themselves, were strongly encouraged to collaborate and seek support from law enforcement and financial authorities.



## COOPERATION

The primary line of defence against the influx of illegal animals into the EU is at its borders. Commercial transports, including those carrying cats and dogs, must pass through designated **Border Control Points (BCPs)** to undergo thorough security and safety checks. At these BCPs, documentation is carefully reviewed, and potential risks, such as health concerns and smuggling, are closely monitored. Further to that, companion animals moved for commercial purposes from non-EU countries to the EU must be declared to **customs authorities** to prevent tax evasion. Taxes are skirted by fraudsters in cases where commercial movement is disguised as a private travel and not declared. Moreover, commercial pet breeders, just like any other type of business, must adhere to **tax laws**. That is why cooperation with national agencies responsible for enforcing tax laws and investigating tax evasion or avoidance is crucial to follow the pets' traffic and to make it financially unsustainable. When it comes to investigating and prosecuting illegal pet dealers, veterinary authorities' powers are usually limited; thus collaboration with police agencies is essential. **Law enforcement authorities** can confiscate pets, conduct undercover inspections and initiate criminal procedures if necessary. The action was also reinforced by police forces. Within the framework of the European Multidisciplinary Platform Against Criminal Threats ([EMPACT](#) Envicrime) sub-action on illegal pet trade, data from the Rapid Alert System for Food and Feed (iRASFF) was shared with relevant law enforcement agencies via Secure Information Exchange Network Application (SIENA). Further, **Europol** cross-checked the data and provided support for coordination of specific cases between police and administrative authorities in different countries.

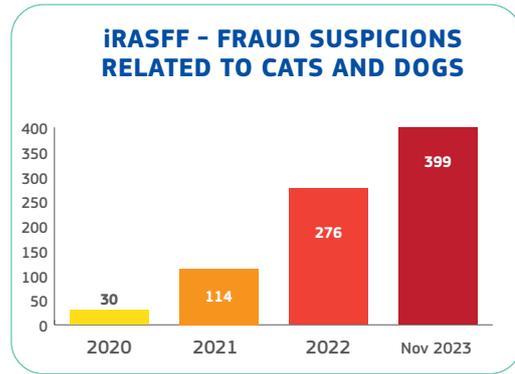
**Animal welfare associations** (Eurogroup for Animals, the EU Dog & Cat Alliance, FOUR PAWS) were invited to the action for their insider's knowledge and expertise. The participation of these NGOs proved especially beneficial in the monitoring of online advertisements. This was particularly significant as many Member States' authorities frequently report resource constraints as a hindrance to conducting thorough online inspections. Additionally, NGOs played a role in intelligence sharing, also disseminating information about the action, encouraging involvement, and raising public awareness regarding the threats involved in pet trade.

The veterinary inspectorates were supported by the European Commission services, which throughout the action provided technical support to Member States on animal health and welfare issues (SANTE) as well as customs expertise (TAXUD). Assistance encompassed also coordinating cases based on notifications reported in iRASFF, sharing data from EC databases as well as producing guidelines for requirements and procedures. Additionally, the Commission coordinated exchanges with non-EU countries and facilitated collaboration with NGOs.

## iRASFF

A noteworthy development in addressing the issue of illegal pet trade in Europe is the use of [iRASFF platform](#) (Rapid Alert System for Food and Feed), which is employed by Member States to exchange information about encountered irregularities, non-compliances and suspicions of fraud.

*Caption: Graph 2 – Number of fraud notifications in iRASFF related to cates and dogs per year*



As per Regulation on Official Controls (EU) No 2017/625, when a competent authority in a Member State becomes aware of a cross-border non-compliance issue, it is obligated to promptly notify the relevant authorities in the other concerned country. Subsequently, both parties are required to conduct necessary investigations to address the issue. These exchanges of information and updates between authorities are facilitated through an online platform known as iRASFF, ensuring a secure sharing of information. The responsibility for fostering this cooperation and coordination between relevant authorities lies with [the EU Agri-Food Fraud Network](#).

Since the inclusion of animal health and welfare issues within iRASFF in December 2019, the number of notifications related to the **breaches of requirements for movement of cats and dogs** has been steadily increasing.

The enforcement action has further intensified this trend, additionally highlighting the importance and the cross-border nature of the illegal pet trade.

	Non-commercial Movement (up to 5 animals)		Commercial Movement (Trade)	
	Within the EU	From Non-EU Countries	Within the EU	From Non-EU Countries
Marking/ Microchip	✓	✓	✓	✓
EU Pet Passport	✓		✓	
Rabies Vaccination	✓	✓	✓	✓
Rabies Antibody Titration Test		✓		✓
Health Certificate		✓	✓	✓
TRACES Registration			✓	✓
Clinical Examination			✓	✓
Declaration of Non-commercial Movement		✓		
Registered Establishment			✓	✓

*Table 1: Simplified list of requirements for movements of cats and dogs within or to the EU (It has to be noted that a rabies antibody titration test is not required for all non-EU countries).*

### 3. RESULTS

Activities within the initiative supported investigations, controls, extensive data collection, and structured information sharing among different services. Authorities participating in the action regularly discussed the problems related to the illegal trade in cats and dogs during the specially dedicated meetings, addressing encountered issues and exploring solutions, while learning from each other and data gathered through increased controls.



**Results from the national controls in individual countries are described in annexes.**

*Caption: Puppies found in a car trunk during control in Germany*



### FINDINGS

**In combating the illegal transportation and sales of pets, the mutual information sharing among authorities enabled the implementation of risk profiling and targeted inspections on suspicious operators and their alleged destinations. The table below shows the cooperation established in Member States throughout the action, highlighting authorities that have actively worked together.**

During this action, guidelines and training were provided to all the participating authorities to enhance their expertise in detecting illicit movements of cats and dogs. Veterinary inspectorates were also encouraged to share their knowledge and data with customs, to aid in identifying and targeting suspicious elements. Unlawful operators often disguise commercial movements as non-commercial ones, therefore not registering them in Trade Control and Expert System (TRACES) and avoiding BCPs checks if animals originate from non-EU countries. Hence, to stop these operators, it is fundamental to flag them to customs authorities and veterinary border inspectors. For this reason, the Risk Information Forms (RIFs) on suspicious operators were created in the Customs Risk Management System (CRMS2). RIFs are instantly accessible to all connected customs offices, empowering them to strengthen their controls. In majority of participating countries cooperation with customs was established and evaluated as satisfactory. Five countries created 27 RIFs (19 by Latvia) reporting suspicious operators in the CRMS2.

Veterinary Services cooperated with:	Police	Customs	Border Control Posts	Tax Authorities	NGO
Austria	✓	✓	✓		
Belgium	✓	✓	✓	✓	
Bulgaria	✓	✓			✓
Estonia	✓	✓		✓	
Spain	✓	✓	✓		
France	✓	✓			✓
Germany	✓	✓	✓		✓
Hungary	✓	✓	✓		
Ireland	✓	✓	✓		
Italy	✓				
Latvia	✓	✓	✓		
Norway	✓	✓	✓		
Poland		✓	✓		
Portugal	✓				
Slovak Republic		✓	✓		

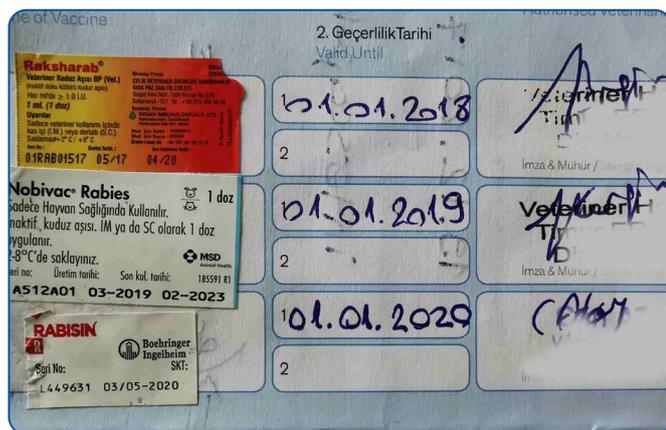
*Table 2: Interinstitutional cooperation in Member States*



*Caption: Illegal transport of dogs discovered during road control in Germany*

The action unveiled complex challenges at EU borders, with three key issues coming to the forefront. Firstly, a significant part of traders abuses the EU legislation on non-commercial movement of pet animals to disguise their real commercial activities. This framework has been designed to facilitate travels of pet owners with their pet animals. However, fraudsters exploit the possibilities offered by such framework to move up to five animals per movement under a more flexible control and tax regime, as animals are not registered in TRACES and not declared at BCPs, thereby evading tax regulations and official scrutiny (veterinary checks to verify compliance before customs release) at border crossings. Moreover, their origins remain unverifiable as, by nature, non-commercial movements do not originate from a registered establishment (See Table 1). Secondly, the action showed a steady use of forged and falsified documents accompanying dogs and cats being transported into the European Union from abroad, with specific concerns among authorities for those originating from Russia and Belarus for which animals are not required to undergo any rabies antibody titration test. Thirdly, even when all necessary documentation is presented during border controls, its careful preparation very often makes it difficult for border inspectors to question it on the spot and detect possible falsification, especially taking into account the need to ensure the welfare of the transported animals. False information, particularly regarding the rabies vaccination status, tends to be discovered later, typically during random checks or examination by a local veterinarian at the place of destination during a first veterinary visit.

*Caption: Example of manipulations uncovered by a Belgian veterinarian in relation to rabies vaccines within a pet passport, where the vaccination date precedes the date of production of the vaccine*

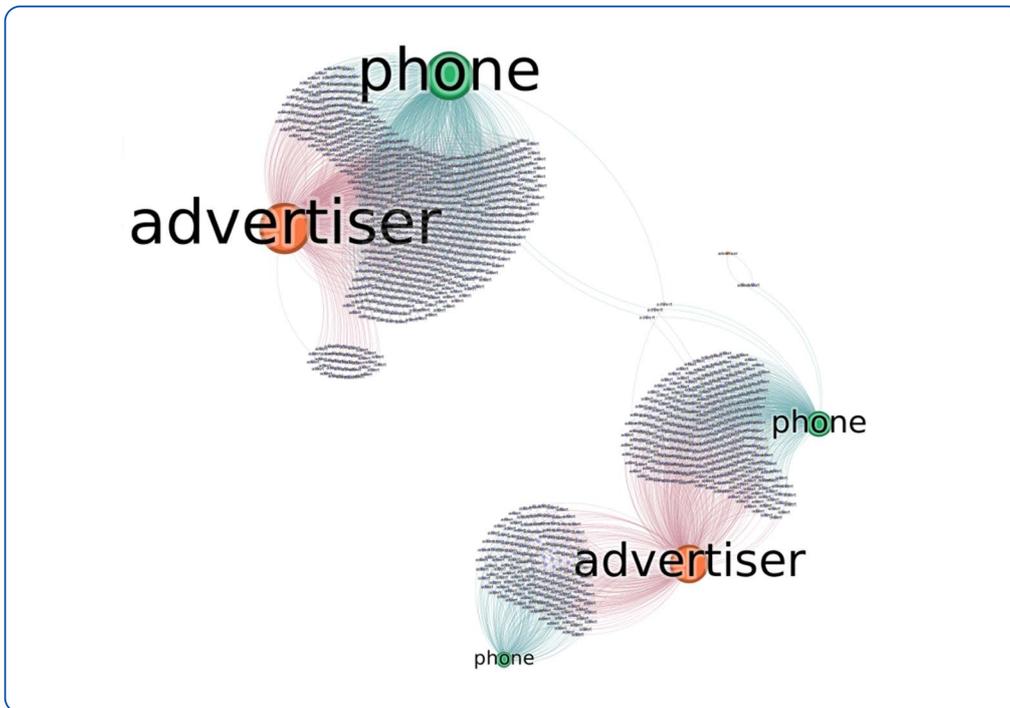


Almost all countries managed to involve to a certain degree police forces in the action. Investigations carried out in this frame led to the identification of individuals but also of organised networks.

**To the knowledge of the reporting officers, 47 judicial proceedings in Member States (19 in Germany) were started in the period of the action.**

Some of them are still ongoing. Several new ones are about to be initiated. Official veterinarians were not always informed, in all Member States, upon the initiation and the outcome of judicial proceedings.

The action showed that the cooperation with national fiscal authorities should be developed further. Belgium and Estonia were able to work on cases with tax authorities. It has to be noted that when the activity of the breeders and puppy traders' businesses is not properly declared, it creates an unfair economic advantage over legitimate sellers who respect law and sanitary obligations. Even though it is difficult to provide exact numbers for underground economy, uncollected sales and undeclared incomes in Europe must be estimated in millions of euro yearly.



*Caption: Graph 3 - The network of three sellers advertising rescued dogs from all over Europe, with more than 1000 unique adverts spread across different websites and using three phone numbers*

NGOs provided valuable support by raising awareness and disseminating information about the action, including among local veterinarians in Member States. They encouraged the reporting of suspicious cases and whistleblowing to the authorities and the Commission. SANTE shared 21 such notifications of suspicious activities with Member States' authorities through iRASFF. This collaboration will persist, with additional cases being notified in the system with the relevant authorities.

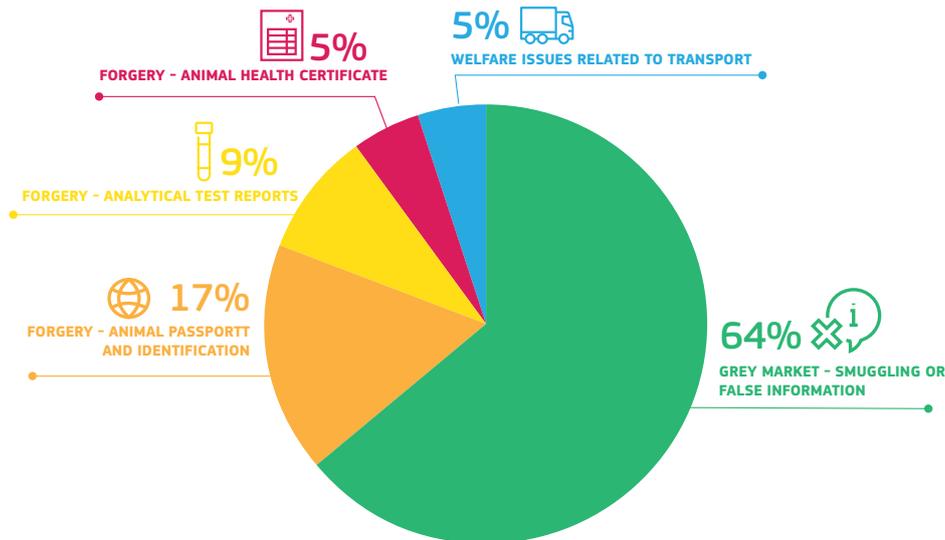
Graph 3 stems from a specialised risk profiling initiative carried out by one NGO between September 2022 and August 2023. In this period approximately 330 000 advertisements spanning various websites within the EU market were monitored. It was discovered that there are organised networks selling a high volume of animals, often under the cover of rescue operations. The findings from this research are shared with authorities to back their investigative efforts of online sales of cats and dogs, which is crucial due to their limited resources to conduct such extensive research in-house.

NGOs contributed to the plan's advancement with knowledge sharing during training with inspectors in Member States responsible for animal health and welfare controls, police and customs officers. The workshops attendance surpassed 500 people, showing that there is an EU-wide, high demand for training related to animal-related controls.

## iRASFF

During the EU Enforcement Action, a total of 467 notifications were generated within iRASFF, seeking assistance in cases involving suspicions of fraudulent activities related to cats and dogs.

These notifications predominantly pertain to severe violations, such as document forgery (EU Pet Passports, Animal Health Certificates, rabies titration results), which involves providing false information regarding the age, origin, or rabies vaccination status of dogs and cats. Many of these cases featured multiple types of fraud at once.



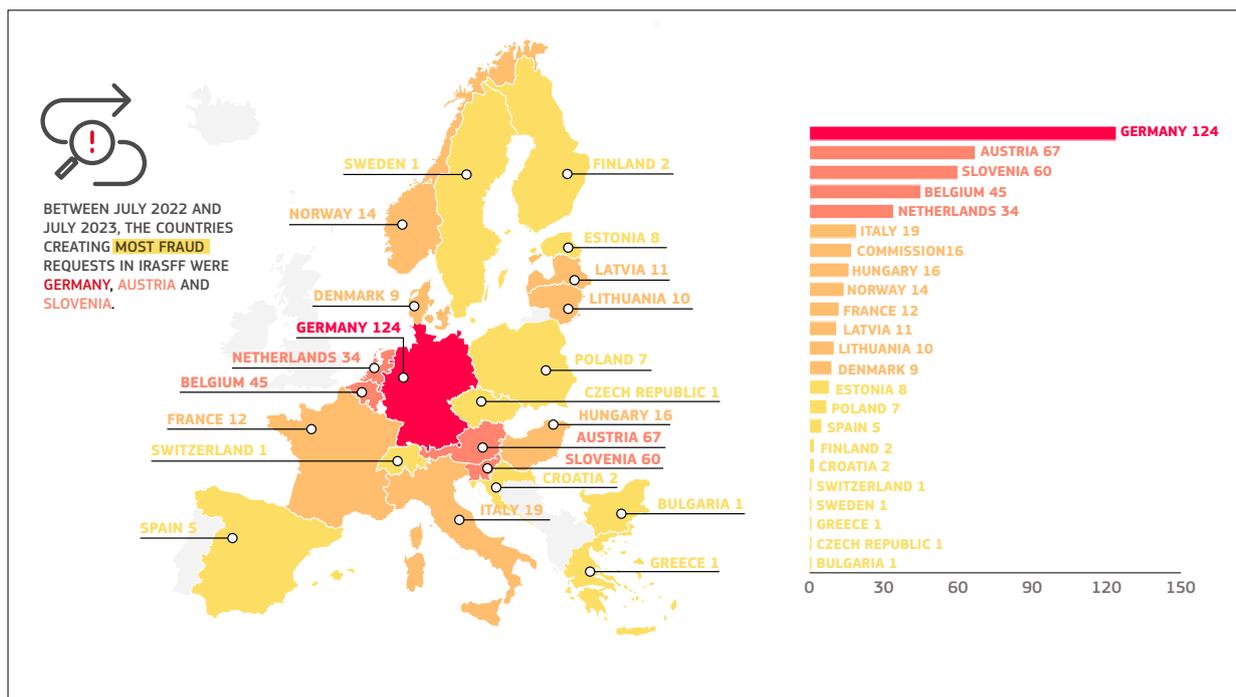
Caption: Graph 4 - Notifications per fraud category in iRASFF. Total number of fraud categories assigned: 534

Within these notifications, Member States exchanged information about illicit operators they had identified, counterfeit laboratory reports in circulation, and requested document authenticity verification or traceability investigations, especially in situations where documents or data were absent or misused in the TRACES system, which often happens when the animals were advertised online. Additionally, notifications related to trafficking of materials used for fraud (e.g., veterinary stamps, vaccines, microchips, injectors, and passports), and cases where EU legislation on noncommercial movement was abused were reported. 93 notifications clearly involved animals purchased through online advertisements, which currently serve as the primary sales channel.

**The challenge for authorities lies in the lack of sufficient resources for e-commerce controls, the sheer volume of adverts and adaptability of rogue sellers, making it easier for illegal trading to occur.**

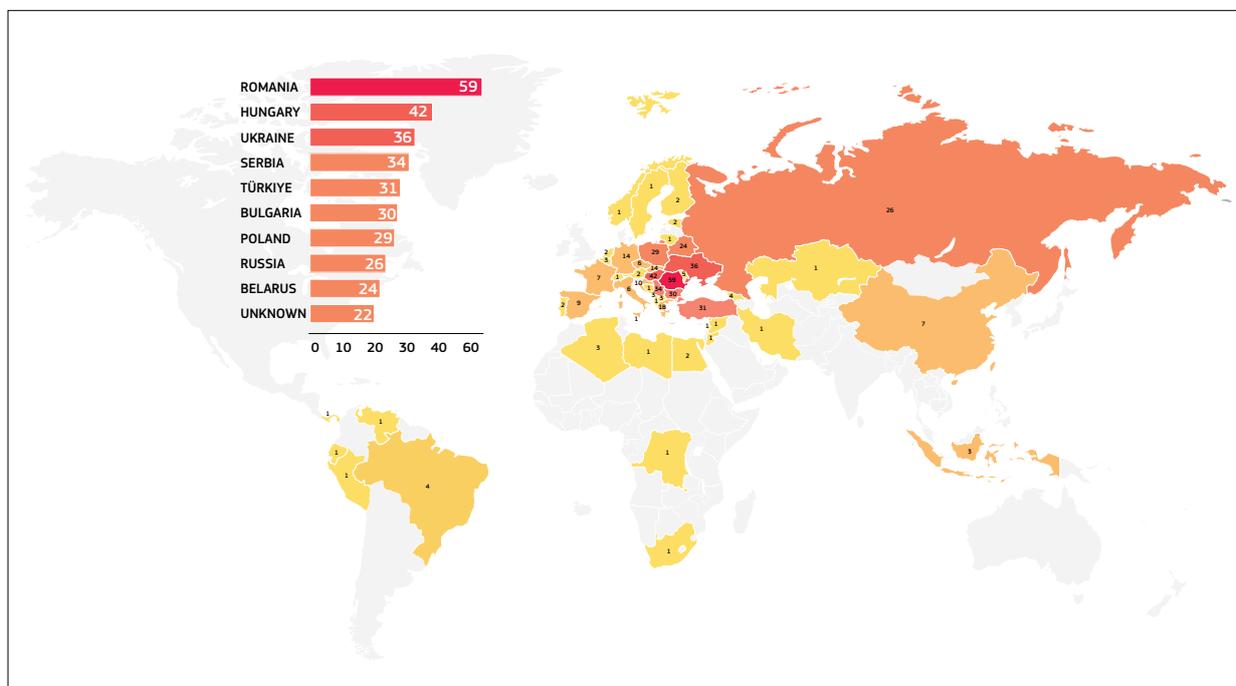
Due to the absence of EU legislation on animal welfare specifically addressing cats and dogs, in the frame of the action, Member States were not mandated to report such violations. Instead, they were encouraged at the national level to enhance the plan by enforcing their respective animal welfare rules. Despite the primary focus on animal health breaches and the non-obligatory nature of declaring animal welfare issues, 78 notifications highlighted cross-border concerns in this regard. Issues mentioned referred to health and wellbeing of animals, breeding conditions and mutilation (ears, tails, vocal cords). The problems related to the transport conditions were reported based on the breaches of the Council Regulation (EC) No 1/2005 on the protection of animals during transport. 27 such notifications were created, which corresponds to the 5% of all the notifications reported in the action. Additionally, 32 notifications raising explicitly animal welfare matters concerned cats and dogs of non-EU origin.

Between July 2022 and July 2023, the countries creating most fraud requests in iRASFF were Germany, Austria and Slovenia.



Caption: Graph 5 - Countries creating fraud notifications in iRASFF between July 2022 and July 2023

Regarding the origin of the animals, the primary suppliers within the EU were Romania and Hungary. However, irregularities were not limited to the EU market alone. They were also observed at the borders for animals arriving from outside the EU, particularly from Türkiye, Serbia, Ukraine, Russia, and Belarus. Approximately 45% of the cases involved animals that directly originated from non-EU countries.



Caption: Graph 6 - Countries of origin implicated in fraud notifications in iRASFF between July 2022 and July 2023

Based on the available documentation, the Commission followed up the notification by gathering the information provided by the Member States and then sending an official letter to the authorities of the non-EU country in question. Such letters may request an investigation into the origin of the animal or the officials responsible for issuing the documents. It would also demand improvements in certification and control procedures before permitting the movement of dogs and cats into the EU.

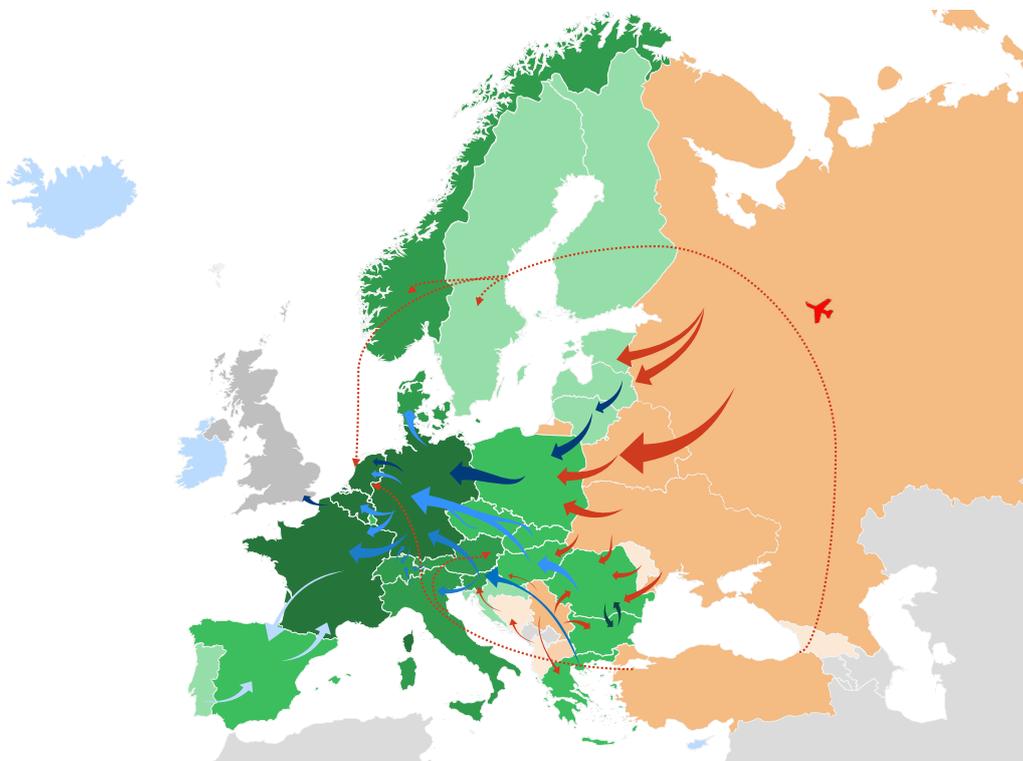


Caption: Fraudulent passport detected by Latvian officers compared to the original



### MODUS OPERANDI AND MAIN ROUTES DETECTED

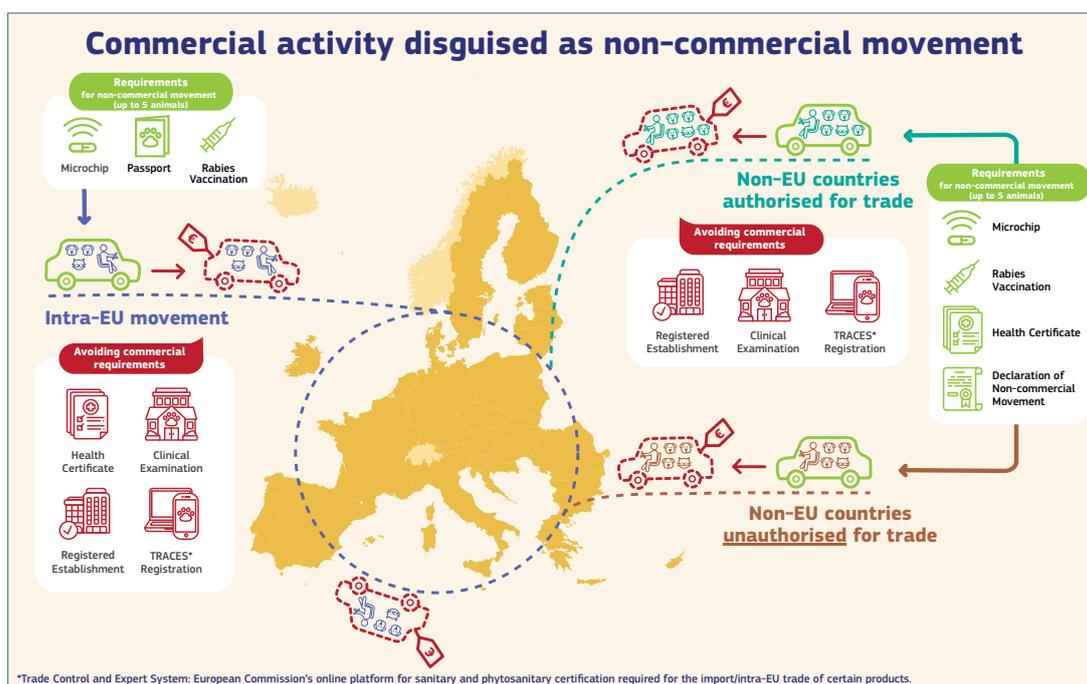
Drawing from data collected in iRASFF, it was possible to discern a common pattern of suspicious movements within Europe. Particularly, during this action, major routes of concern included transports from Romania, Hungary, and Poland to Germany. Additionally, for movements originating outside the EU, notable routes involved air transport from Türkiye to the Netherlands, as well as land transport from Serbia to Slovenia and Austria, and from Russia and Belarus to Poland and Latvia. It is worth noting that although these routes all encompass illegal trade, each exhibited distinct trafficking methods.



Caption: Graph 7 - Main transport routes observed in iRASFF

## COMMERCIAL ACTIVITY DISGUISED AS NON-COMMERCIAL MOVEMENT

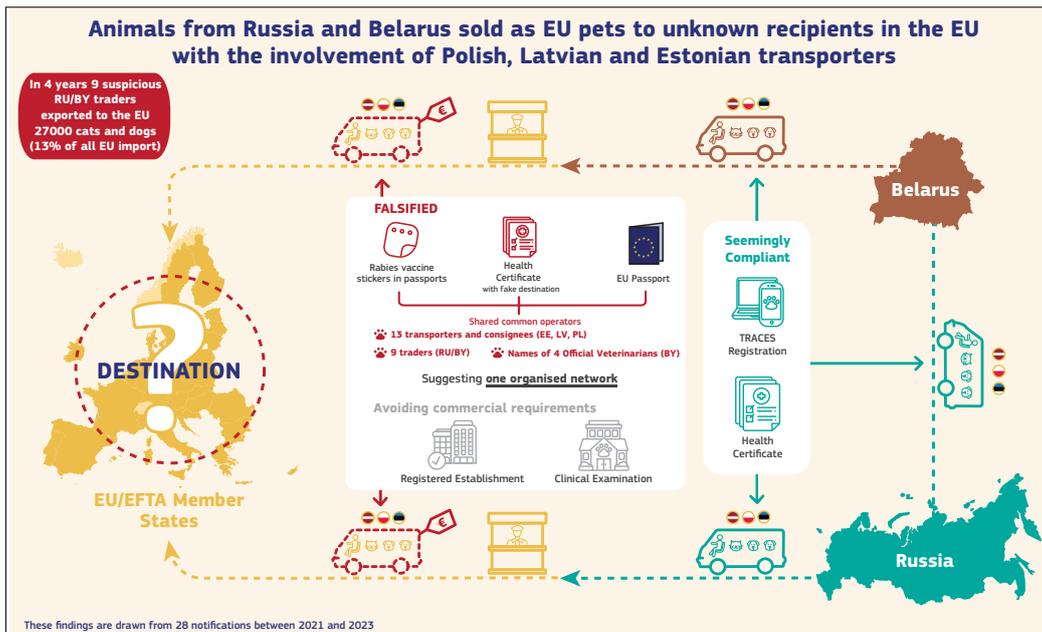
The commonly occurring issue concerns the movement of dogs and cats supposedly with their owner(s) but in fact concealing commercial intentions. This problem has been under discussion in the EU in recent years, and despite measures taken, it persists. This practice is not only used as part of an organised network of activities, but is also common among smaller breeders to avoiding health requirements, registration in TRACES and skipping the need to provide traceability information. Additionally, it allows for the circumvention of customs rules on prohibitions and restrictions, and furthermore enabling individuals to earn untaxed income by not declaring goods for commercial purposes. These disguised movements occur both within the EU and from non-EU countries, which is particularly concerning for countries where the export of pets to EU for commercial purposes is not authorised. This makes this practice the only way to introduce pets from those origins into the European market.



Thanks to the overview of all notifications in iRASFF, Commission Services could identify connections between cases, focusing on recurrent operators. This would not be possible solely by Member States, having only access to notifications in which they were implicated. Following these findings, more than 20 clusters (subgroups of cases having as a common denominator a recurrent operator) were identified. In this respect, contact points in Member States were informed about their possible mutual interest in exchanging information about each specific case. Additionally, whenever possible, research reports on the most recurrent operators were shared by SANTE in the network as support for the investigations. The largest cluster has so far linked over 60 separate notifications created by different Member States (Scheme 1). EU-wide interconnectivity of fraud is clear, and analysis allowed to distinguish four main routes throughout the action.

**It is paramount to remember that the animals involved in the schemes are often underaged and inappropriately vaccinated, coming from hardly traceable breeders, which leads to possible concerns to public and animal health but also animal welfare and consumer protection.**

# 1 ILLEGAL TRAFFIC OF PETS FROM RUSSIA AND BELARUS WITH ESTONIAN, LATVIAN AND POLISH TRANSPORTERS



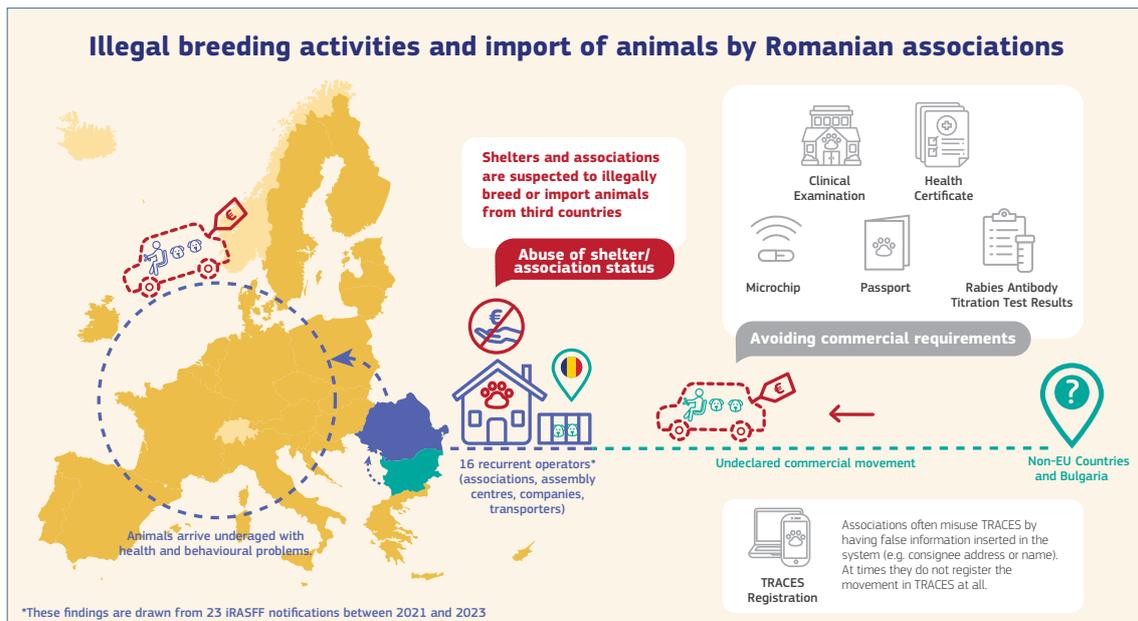
Animals are transported commercially from Russia and Belarus by Estonian, Polish and Latvian transporters to different destinations than the ones declared at the time of control. At the moment of crossing the border, the documents appear to be in order. However, there is often no opportunity to verify their exact destination. Instead, they are frequently regrouped in the first country of entry and then continue their journey with new documents, as EU pets, with no trace of their real origin. Some animals do not show immunity against rabies despite vaccination information included in their passports and health certificates. Nine recurrent Russian/Belarusian consignors, four Belarusian official veterinarians as well as one Estonian, seven Polish and five Latvian operators (consignees, transporters and operators responsible for the consignment) have been implicated in this case across 28 notifications between 2021 and 2023. According to data from TRACES, the nine suspicious Russian and Belarusian exporters account for almost 27 000 animals imported in the EU over the last four years, that represents more than 13% of the worldwide export of cats and dogs to the EU. This means that 1 in every 8 consignments of cats and dogs entering the EU from non-EU countries comes from one of those suspicious Russian or Belarusian consignors.

# 2 FALSIFIED GREEK AND BULGARIAN PET PASSPORTS FOR DOGS FROM SERBIA



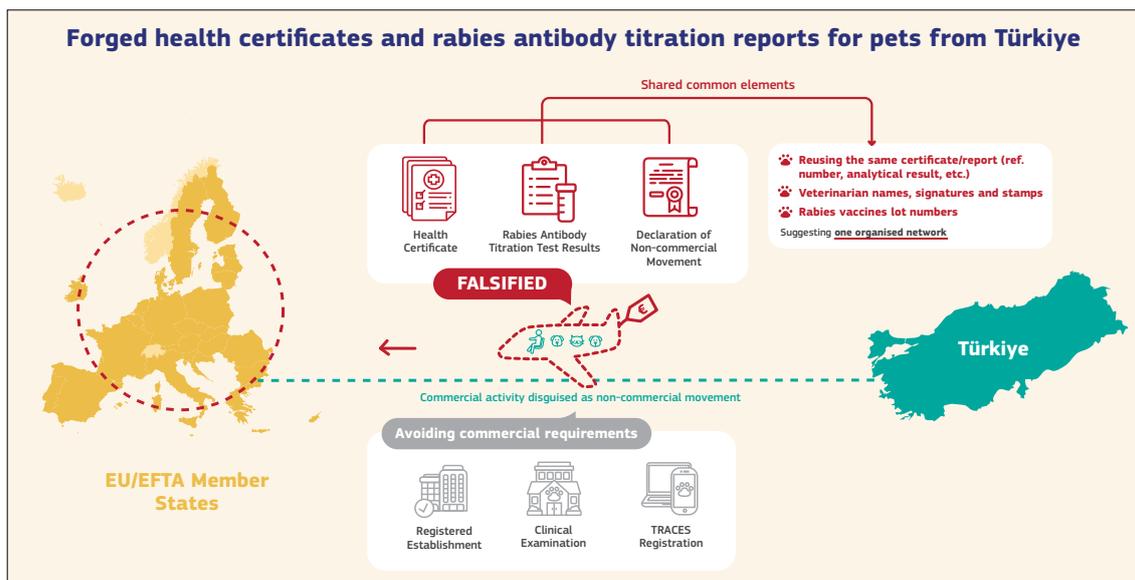
Analysis of more than 60 notifications in iRASFF, involving 12 countries, made it possible to unveil an organized network responsible for selling Serbian dogs in the EU with falsified Greek or Bulgarian pet passports. Animals arrive in Slovenia and Austria, often with the intention of continuing their journey further west. The implication of eight recurring veterinarians and six recurring operators (transporters, breeders and first owners) was shown. Additionally, the same rabies vaccine lot numbers were displayed on the vaccine stickers in passports issued by different veterinarians, sometimes the same lots have various expiration dates.

### 3 ILLEGAL TRAFFIC OF DOGS THROUGH ROMANIAN ASSOCIATIONS



Following many exchanges between Member States it was established that some Romanian shelters or animal welfare associations are suspected to take advantage of their status to breed dogs illegally or to import dogs from non-EU countries and advertise them online for sale. It was observed that dogs originating or transiting through Romanian associations arrive in Western Europe displaying many non-compliances. Those include the lack of required documentation or permit/registration as well as incorrect data entered in health certificates or passports. The age of the puppies or the high number of animals raises suspicion against certain organisations as regard to illegal breeding activities or with respect to the possible supply of puppies from other EU- (e.g. Bulgaria) or non-EU countries. Additionally, a “symbolic fee”, described as the alleged cost of transport or care, is usually required to obtain the pet. Since these movements are not declared as commercial, this fee, along with the financial profit generated from the exchange, can remain unnoticed by authorities, enabling these fraudulent organisations to engage in tax evasion. The problem appeared in many exchanges in iRASFF, with one particular cluster concerning 23 notifications between 2021 and 2023 involving 16 recurrent operators (associations, assembly centres, companies, transporters).

## 4 FORGED HEALTH CERTIFICATES AND RABIES ANTIBODY TITRATION REPORTS FOR PETS FROM TÜRKIYE



As for above, the issue, which is regularly detected in several Member States, is related to the movements of pet animals from Türkiye, which are suspected to be destined for sale but are moved under the non-commercial movement scheme with forged documents. The regular use of falsified rabies antibody titration test reports from Turkish and European laboratories and health certificates may also question the proper vaccination of the animals. Analysis found that those forged documents present similarities regarding the template, usurped name of veterinarians, name of veterinary clinics, stamps and vaccine lot numbers, suggesting that they are used by the same organised network. This concerns 34 notifications between 2021 and 2023.

## 4. PROBLEMS IDENTIFIED

### COMMERCIAL ACTIVITIES DISGUISED AS NON-COMMERCIAL MOVEMENT

Member States and several stakeholders consider that TRACES data underestimate the volume of the pet trade, as it is often disguised as non-commercial movement and thus not registered.

Fraudsters are abusing the EU's pet movement legislation (Regulation (EU) No 576/2013), which allows "owners of animals" to travel with up to five animals under specific conditions, without having to record it in TRACES and without having to present imported animals at BCPs. In case of illegal practice, the "owner" would travel with several pets through travellers' points of entry (mainly customs points of control), not through the BCPs where veterinary controls are performed, and after arriving to their destination, transfer the ownership of the animal to the buyer. Those animals could, in addition, be accompanied by falsified health certificates, illegally issued EU pet passports, false information on the origin, or forged rabies antibody laboratory results. Detection of alleged "non-commercial" movements often relies on random checks, leaving many cases possibly undetected.



## TRACEABILITY

### **The illegal trade of cats and dogs poses intricate traceability challenges.**

Buyers typically have minimal information about these pets, with falsified documents and deceptive origin claims in advertisements making it particularly challenging to identify the true source. Dogs and cats pass through complex supply chains, involving breeders, sellers, and transporters, making it difficult to establish real origins and identify wrongdoers. Cross-border dimension of these movements further complicate traceability due to varying legal frameworks, language barriers, and differing enforcement capacities among countries.

When pet passports are not linked irrevocably and in a secure way to individual microchips, illegal traders can easily transport dogs across borders without detection, changing passports and thus ownership, origin and health information. This problem extends to untraceable dogs and cats transported across Europe for commercial purposes, notably from countries like Romania, Bulgaria, and Poland. The lack of proper identification – extending from merely the microchipping of the animal and the listing of the microchip number in the accompanying documents, to establishing a solid connection between the animal's microchip and the breeder/owner through registration of their information, together in a database – hinders controls and enforcement and depletes resources, while perpetuating illicit trade and compromising public health, animal welfare, consumer protection and the internal market

Moreover, the absence of mandatory dog identification and microchip registration in a database in Estonia, Poland, and Germany, and similar gaps for cats in twenty Member States, further facilitates obtaining animals from illegal or unknown sources. Puppies are sold and travel without being properly identified by their breeder/keeper – who is primarily responsible for their health and welfare as also provided for by Regulation (EU) 2016/429. Often they are even moved and sold without microchips or documents, awaiting registration in another country under a subsequent keeper or owner.

Additionally, in order to operate verification on the registration status of dogs and cats, the responsible authorities often need to contact other countries to access specific animal information from national databases, which requires extra resources and increases the time taken to complete the assessment process.

Within the European Union, the trade of animals, including dogs and cats, must be registered in TRACES, the European Commission's platform used by the EU for sanitary and phytosanitary certification and border clearance operations. However, even within this system, challenges persist. False information can be inserted into Common Health Entry Documents (CHED-As), particularly by inputting fake recipient addresses, thereby obscuring the genuine destination of the pets. Also, misuse of legitimate consignee addresses further complicates traceability efforts. When this happens, it usually means that animals are handed over directly to the new owner, making it impossible for the veterinary authorities to conduct necessary checks.



## ONLINE TRADE

### **Online sale of cats and dogs has rocketed in last years, leading to hundreds of thousands of dogs and cats being advertised for sale online on any given day.**

Due to a lack of resources in many countries, systematic comprehensive screening is made impossible. Offenders can easily reach a wide audience while operating remotely, making it difficult to monitor and track their activities. Online advertising and selling contributes to the loss of traceability since the information shown in adverts is often not verifiable. It is common for advertisements to

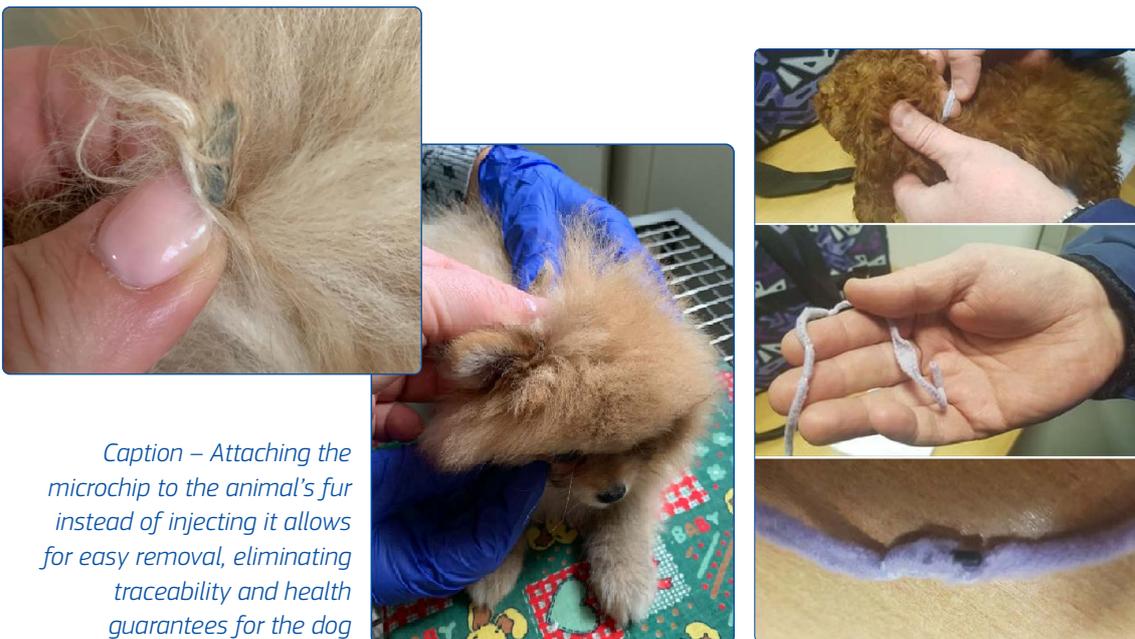
include information like the animal's microchip number, that of the parents, and the registration number of the breeder/seller. Yet none of this can be swiftly and reliably verified as corresponding to the advertised animal and specific advertiser. An advert may indicate a microchip number, that a prospective buyer may find as registered in a database. This is already quite challenging for consumers to verify, especially pre-sale. However, the information about the owner of the animal is registered but is not publicly available. As such, the advertised microchip might as well belong to an animal registered to someone else. It is common for illegal sellers to utilize such methods to appear legitimate, secure fast sales and disappear without any link to the animal sold. The sale or placement of illegally traded pets often takes place not only on official platforms of all sizes, but also via closed groups on social media, even though the terms and conditions do not allow it. Platforms widely use email verification to "verify" the advertiser, approve him, and create a sales account. Therefore, illegal sellers can have multiple email accounts to sell under different profiles. For platforms introducing mandatory fields like the microchip and breeder registration number these may as well be falsified or copied from legitimate breeders. Overall, experience shows that none of this data is checked against the database that holds it. Some Member States already have direct contact with platforms to report fraudulent practices; yet not all of them are responsive.



## ASSOCIATIONS / SHELTERS

**Some shelters and animal welfare associations, purportedly dedicated to rescuing animals, have come under suspicion for potentially engaging in illegal breeding, importing, and trafficking of cats and dogs.**

They massively use social media not only to publicise their activities and reach potential customers, but also to ask for donations, to cover alleged costs of transport or animal care. The challenge lies in the difficulty of conducting thorough on-the-spot investigations to distinguish between genuine rescue efforts and those that illicitly profit from the abuse of animals. It is worth noting that some organizations actively conceal their activities, such as orchestrating covert movements and imports to evade national legislations and taxation. Furthermore, there have been instances where organizations advise customers on concealing or preventing poor rabies titre test results, raising concerns about the transparency and ethical practices within certain animal rescue entities.



*Caption – Attaching the microchip to the animal's fur instead of injecting it allows for easy removal, eliminating traceability and health guarantees for the dog*



## ENFORCEMENT CHALLENGES

**Identifying illicit sellers and tracking illegal networks of dog and cat traders presents various difficulties for controlling authorities due to the complex nature of this trade.**

Very similar enforcement challenges were raised by the investigators all over Europe: Fraudsters frequently disguise commercial intentions, bypassing a number of requirements. Additionally, traders often operate in a cross-border and underground manner, making it difficult to gather evidence, identify key players and coordinate efforts sharing information between different jurisdictions. Lack of a common database with accurate, reliable, identity-verified registered data on animals and their breeders and owners can hinder control authorities' ability to understand the full extent of the problem and conduct efficient investigations. Currently there is a varied registration landscape across the EU. It is not without significance that illegal dog and cat trading might be considered a lower priority compared to other crimes. This results in unwillingness of some authorities to cooperate and in limited resources (including necessary training) allocated to investigating animal-related crimes that impedes authorities' ability to effectively target fraudsters on the market and combat illegal trade. The use of international cooperation through Europol is strongly encouraged to enhance cooperation at police level.



## PENALTIES

**As long as there is serious lack of proportionality between possible high earnings and eventual low penalty, the fraud in pet trade will continue.**

According to the Article 139 of Official Controls Regulation the penalties provided for violations perpetrated through fraudulent or deceptive practices, should be “effective, proportionate and dissuasive and reflect, in accordance with national law, at least either the economic advantage for the operator or, as appropriate, a percentage of the operator’s turnover”.

Where a non-compliance is established, ordering unloading, holding and care of animals in quarantine is the most commonly used action by authorities, with all expenditure incurred under these measures to be borne by the responsible operator. This may be perceived as a significant sanction, often for the recipient but not for the operator at the initiative of illegally trading animals. For example, if an unvaccinated dog/cat arrives in Ireland, it has to stay in a dedicated quarantine centre from 30 days to four months. The cost varies between €20 to €100 depending on the time and day of admissions with weekends and bank holidays more expensive (€50-100). Quarantine rates are €25 per day. In case there are some issues with the documents, these animals are sent to quarantine with a €100 admission charge, and the same amount as above is charged per day.

Besides quarantine, depending on the infringement detected, different sanctions are applied in Member States – from formal letter to closure of the establishment, suspension of licenses and permits or penalties ranging from €100 to several thousands of euro.

As generally the amount of how much money illegal sales of companion animals can bring to the operators is underestimated, often the penalties for unlawful practices are not proportionate to the turnover made. Fines are usually very low (approx. €100-300 administrative fees per dog, up to €2 000 in Bulgaria for repeating offense or €3 000 for illegal introduction of a pet in commercial movement in Spain), considering that a penalty of €600 000 to one breeder in Greece had not disturbed the business continuity.

## 4. CONCLUSIONS

**Illegal movement of cats and dogs has wide-ranging consequences, impacting not only the health and welfare of animals and public health but also causing economic damage through consumer fraud, unfair competition to breeders and tax evasion and undisclosed revenues.**

The EU coordinated action has been instrumental in spotlighting these problems. By exposing fraudulent activities and identifying recurring patterns and *modi operandi*, this initiative has taken a significant step towards addressing a long-standing problem. The insights gained from this action should help to implement more targeted and effective controls in the future. By adopting a risk-based approach, Member States can allocate their limited resources more efficiently and prioritise interventions where they are most needed. The action has also highlighted the pressing need for enhanced controls, training, stronger penalties, effective enforcement of law, and the need for unified regulations in Member States on specific topics. Dedicated measures are necessary to help address the complexity of the illegal pet trade. To that end, it is essential that enforcement authorities operate within a streamlined and predictable regulatory framework, equipped with the necessary means, including technological, that would provide for cross-border access to reliable traceability information on individual animals, allowing them to perform their duties as efficiently as possible. Recognising the international dimension of this issue is crucial to address the complexities of illegal trade of cats and dogs effectively. Consideration should be given to addressing the illegal pet trade online, which would likely require the use of dedicated technologies for platforms to provide for the advertisement of traceable animals.

Subsequently, it is crucial to maintain ongoing collaboration and the exchange of relevant information acquired through administrative procedures with law enforcement agencies. This enhances communication through EUROPOL's National Units and their Secure Information Exchange Network Application (SIENA), improving the EU-wide intelligence picture of this trade, leading to more effective enforcement activities, quicker identification of illicit activities, and ultimately, a stronger collective effort in curbing the illegal pet trade.

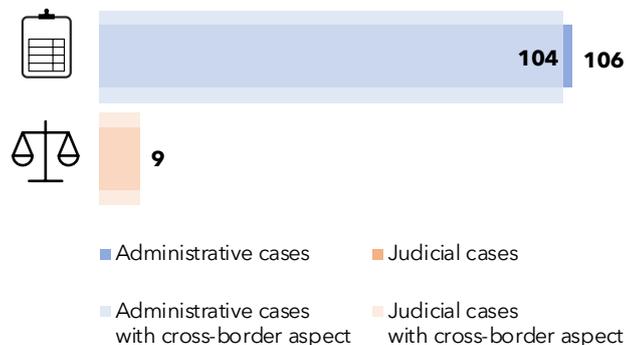
Overcoming the identified challenges will require a multifaceted approach involving strengthened legal frameworks including dissuasive sanctions, increased resources for control activities, enhanced and continuous collaboration between all relevant national authorities (veterinary, customs, police and judicial authorities) and with stakeholder organizations as well as informative public awareness campaigns to empower consumers to make informed choices and decrease the supply from dubious sources.



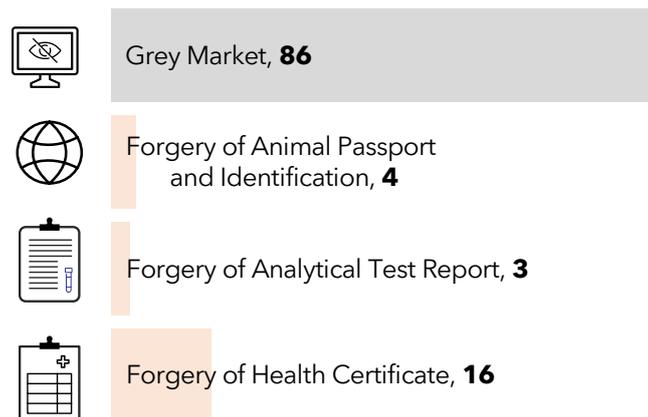
# BELGIUM



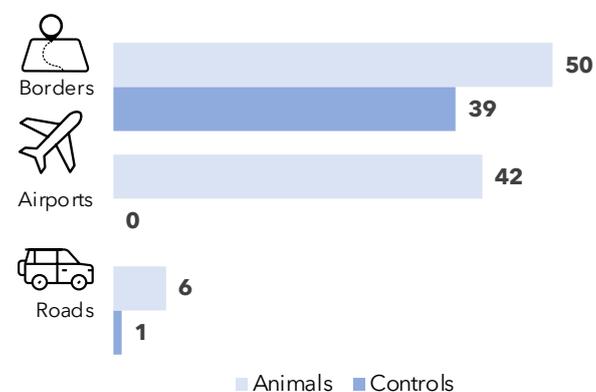
## ADMINISTRATIVE AND JUDICIAL CASES



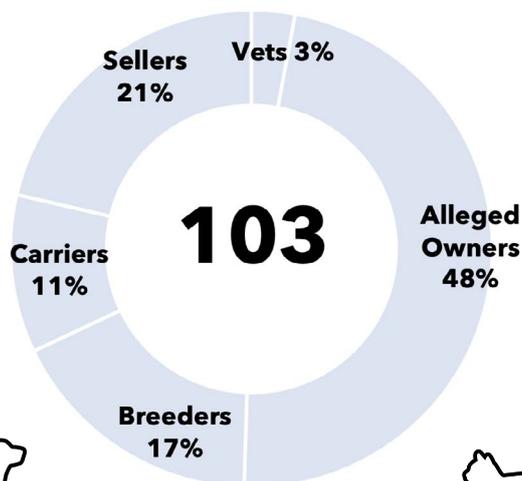
## FRAUDS DETECTED



## CONTROLS AND ANIMALS CHECKED



## ON SITE INSPECTIONS



## COMMENTS

This action was very useful to gain a better understanding of the situation of the frauds in the sector and have good communications between enforcement officers in our land and with other member states.

Given the amount of information to process, time and resources are limited unfortunately.

We found the legal possibilities to control online trade are limited. We believe that to gain a better control of the situation : Identification and registration of all pets should be mandatory, and the European pet passport should become the only documentation of the animal, an identity card more than a travel document.

Identification should occur by a veterinarian, before a determined age and prior to any trade or movement. All registrations should be accessible in a database shared between member states. Mandatory use of ISO code microchips could be useful to research traceability of pets.

Advertisement could be regulated at European level, for example by allowing only advertisements containing validated identity and registration number of sellers, or by making the online sale possible only via authorized and controlled websites.

Minimal common requirements for all breeders and traders should include mandatory registration based on common welfare practices, installations requirements, traceability.

The information provided for non-commercial transport is frequently voluntarily false or incomplete. It could be useful to have a self-declaration system based on registered identity documents for the owner and the animal, on a dedicated online platform.

Some associations are actively engaged in illegal activities, for example by importing animals from third countries without certification or valid identification. An approval number like the one breeders have for commercial activities might help in this case.

## CONTROLS

Information regarding four cases about the dog trade with financial implications was provided to the fiscal authorities.

# BULGARIA



## ADMINISTRATIVE AND JUDICIAL CASES



■ Administrative cases    ■ Administrative cases with cross-border aspect

## FRAUDS DETECTED



Grey Market, **7**



Forgery of Animal Passport and Identification, **37**



Forgery of Analytical Test Report, **0**



Forgery of Health Certificate, **3**

## CONTROLS AND ANIMALS CHECKED



Borders

676

8542



Airports

91

264



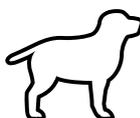
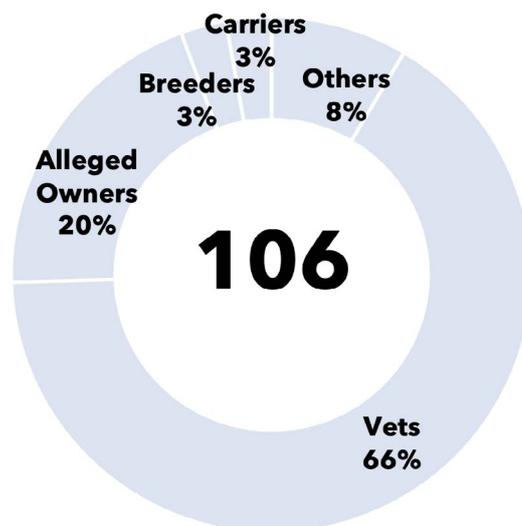
Roads

133

1156

■ Animals    ■ Controls

## ON SITE INSPECTIONS



## COMMENTS

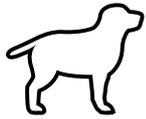
Periodic meetings where Member States experiences are shared are very valuable. Unfortunately, some of the national Bulgarian laws and mainly the criminal code need changes and modernization. In some cases, it is difficult to initiate their amendment due to the lack of political will. The adoption of common European legislation would solve some of the problems regarding the imposed sanctions.



## FINES

Administrative fines ranged between €100 and €200 and repeating offense from €250 to €2.000.

# DENMARK



## COORDINATION AND CONTROLS

The Danish Veterinary and Food Administration (DVFA) have not organized or carried out actions in the CCP, but participated as Veterinary assistance in the police control action carried out in connection with EMPACT 3.4. focused on illegal importation of pets. It is the Danish Police, special task force on animal welfare and transport who organize and carry out control actions on the borders of Denmark concerning movements between Member States. The DVFA yearly carry out multiple control actions coordinated and planned in advance concerning illegal pets, and also react to many cases when they arise. Resources therefore were already allocated to other control actions and reported suspicious cases when the CCP was announced. iRASFF was prioritized to be coordinated for all control units to contribute to the coordination between Member States.

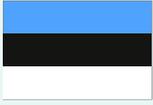
## COMMENTS

More coordinated actions are needed, as the problems are growing and many Member States are affected. iRASFF is a very beneficial tool for cooperation. As more authorities are involved in control actions and other initiatives are in place (like EMPACT) it is not always easy to allocate resources. Improving coordination between organisations and sharing of data (European Commission and EUROPOL) would therefore be helpful. It would be useful if the Commission could help in educating staff on how to identify fraud and these organized criminal networks.

## € FINES

Denmark does not apply administrative fines for violations of importation of live animals. Violations are forwarded to the legal system, for prosecution and sanctions.

# ESTONIA



## FRAUDS DETECTED

### Frauds detected



Grey Market, **1**



Forgery of Animal Passport and Identification, **1**

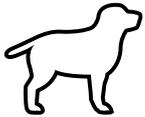
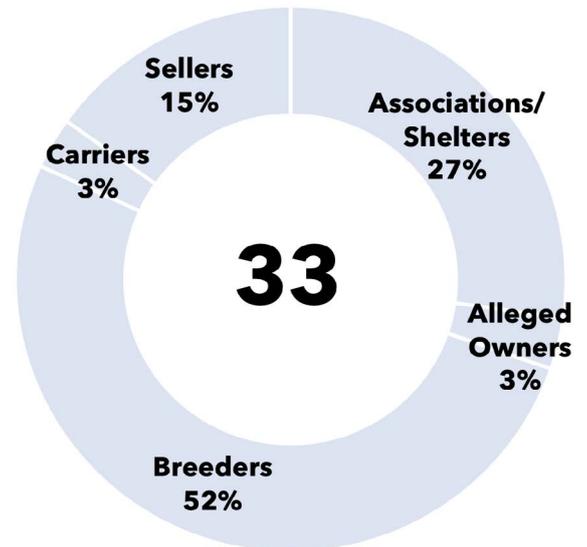


Forgery of Analytical Test Report, **0**



Forgery of Health Certificate, **38**

## ON SITE INSPECTIONS



## CONTROLS

Over a period of three months, a total of 17 breeders underwent inspections. The border control post along the Russia-Estonian border is responsible for overseeing every pet crossing the border. Shelters are actively involved in transporting dogs from Russia through this specific border point. The volume of dogs tends to fluctuate, with an average of 300 dogs per month.

## COMMENTS

The coordinate action improved control measures, leading to better oversight of the market. Insights gained from the experiences of other entities, as well as the exchange of information, have significantly contributed to these advancements. To improve future actions more collaboration with custom authorities is needed.



## FINES

The initial step involves issuing a prescription, bringing out the specific issues that need to be fixed. In cases where violations are more serious, approval removals might be imposed. Fines for not implementing authorities' prescriptions have reached €200.

# FINLAND



## COORDINATION AND CONTROLS

Due to limited resources, Finland was not able to carry out controls related to the action. However, controls of suspected cases of illegal movement or import of pets were dealt with in a regular manner. In 2022 this included almost 250 cases of intra-union movement as well as 967 cases of third country imports or movements where the requirements were not met. A cooperation network dealing with illegal movements of pets was founded in 2018. The network includes the Finnish Food Authority, Customs, Police, Tax Administration, the National Prosecution Authority and Regional State Administrative Agencies. For nine months during 2023 some additional resources were allocated to strengthening this cooperation. This has allowed for development of processes and instructions, educational efforts, and the introduction of iRASFF as a tool in the fight against illegal and fraudulent movements of pets.

## COMMENTS

iRASFF has proved to be a very useful tool for the development of cooperation and information exchange. It is our sincere hope that the Commission channels resources into educating authorities in Member States on fraud in the illegal pet trade for instance by means of BTSF courses. Special attention should be paid to EU external borders, as fraudulent “EU washing” of animals from third countries is a common way to introduce pets illegally into the Union.



## FINES

Administrative range between €300 and €5000.

Animals checked at the border when arriving directly from a third country either through a BCP or a Travellers' Point of Entry. Data excludes inner market.

Finland	2017	2018	2019	2020	2021	2022
<b>non-commercial (pets)</b>	21286	23720	23387	7232	7753	15365
<b>non-compliant</b>	559	578	556	236	376	934
<b>commercial (consignments)</b>	975	676	690	255	188	89
<b>non-compliant</b>	17	11	4	3	1	0

Both COVID-19 pandemic and the war in Ukraine had influence on presented numbers. Additionally, the reason for decreased non-compliances is that the documents of the **commercially imported** animals are requested in advance, before they are loaded in their country of origin. It is also a contributing reason for the sharp decline in commercial numbers. It is easier to import through other countries with different requirements.

# FRANCE



## ACTION'S RESULTS



254 **Administrative cases** were reported in July 2022.



3 **Judicial proceedings** were initiated.

## FRAUDS DETECTED



Grey Market, **5**



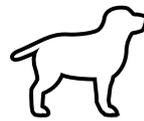
Forgery of Animal Passport and Identification, **10**



Forgery of Analytical Test Report, **0**



Forgery of Health Certificate, **0**



## FINES

No administrative fines were issued, just formal notice for 3 breeders that shipped dogs without TRACES or vaccination against rabies.

## COMMENTS

This action raised awareness of the many ways in which the illegal trade in pets takes place both within and beyond the EU's borders.

France carried out targeted checks on suspicious operators and shared information with the Member States concerned.

France implemented a new regulation, since November 2021, all imported puppies must at least have an adult tooth, it's easier to control than try to guess the exact age of the animal and aims at preventing the importation of under age puppies.

We are grateful to the Commission for the considerable work it has done to identify clusters of operators, and regret that some countries have not reacted. Deterring well-organized fraudsters requires swift and comprehensive responses.

Dedicated meetings with the countries concerned and strong EUROPOL involvement in future cases are welcome in order to follow up on judicial investigations.

# GERMANY



## ON SITE INSPECTIONS

# 907

Breeders, owners,  
animal shelters,  
veterinarians,  
transporters

## FRAUDS DETECTED



Grey Market, **1374**



Forgery of Animal Passport and Identification, **305**



Forgery of Analytical Test Report, **7**



Forgery of Health Certificate, **0**

## CONTROLS



Borders

**33**



Airports

**14**



Roads

**84**

## INITIATED MEASURES



Initiated administrative offence proceedings, **178**



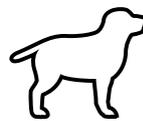
Administrative measures, **447**



Animal removal with transfer of ownership, **72**



Quarantine, **629**



## COMMENTS

The adjoining data do not refer to Germany in total; individual federal states are missing. The coordinated EU action has raised awareness among authorities and provided useful information for further controls and fraud investigations regarding the illegal trade in cats and dogs. Risk Information Forms' procedure will be maintained. The online sale/advertisement of pets mostly takes place via closed WhatsApp/social media groups, which makes monitoring and investigations more difficult. The persons responsible for the ads often cannot be traced, as there is no or very delayed response from the portal operators. Misuse of recipient addresses in TRACES is common. Operators in the country of origin often indicate the NGO's headquarters as the destination, although the animals are transferred directly to the adopters. The establishment of a European database to record violations and the corresponding penalties, as well as a database for dogs and cats would be helpful. Traceability to the seller when offering and selling pets on the internet or via social media platforms should be ensured. Sales contracts between buyers and sellers should be mandatory.

## ACTION'S RESULTS



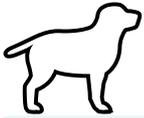
19 **Judicial proceedings** were initiated.



### FINES

On average, a fine of €200-300 was incurred per involved dog.

# GREECE



## COMMENTS

The main challenges of this action concerned the difficulty to collect strong evidence to send cases in court. The collaboration and communication through meetings with other services (Customs, Police, Europol, Third countries' competent authority) is essential to resolve such cases. Different actions improving the awareness of the citizens/possible puppy buyers of the risks and the illegal trade are also needed.

The network created through this action has facilitated the early communication and diffusion of possible cases of fraud. It has also helped to create awareness between Member States and increase speed of reaction.

€ 1 **Judicial proceeding** is still pending with a possible fine of €800.000.

Sanctions start with a recommendation before passing to more stringent measures, as foreseen, in case of repetitive actions.

Another case of attempt of illegal entry of pets (dogs and pet birds) originating from Serbia took place very recently and was blocked at the Greek borders with the involvement, through the SIENA network, of Europol in different countries. The case is under scrutiny for potential involvement in illegal pet trade and the people involved are facing an administrative fine. The investigation is still ongoing.

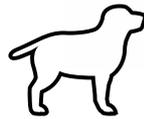
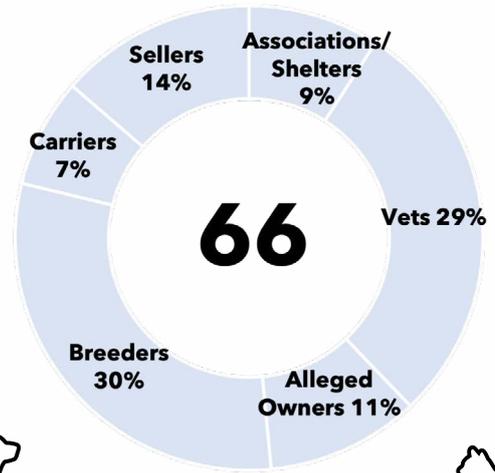
## ON SITE INSPECTIONS



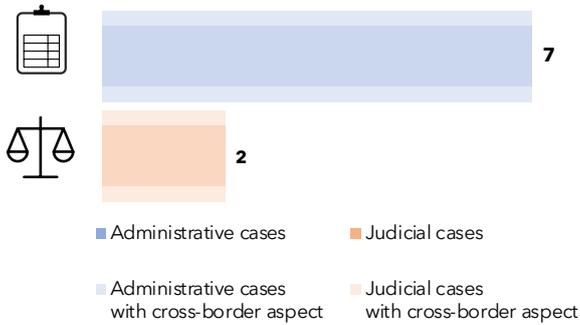
# HUNGARY



## ON SITE INSPECTIONS



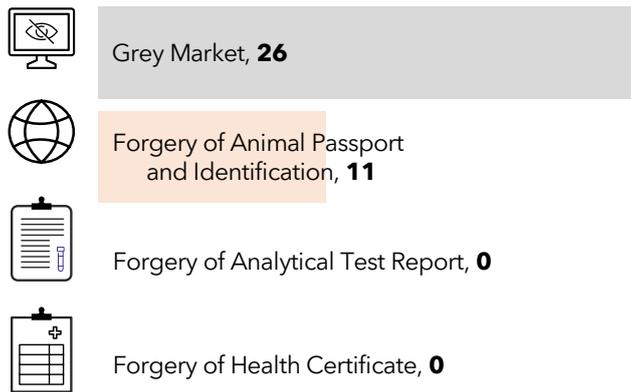
### ADMINISTRATIVE AND JUDICIAL CASES



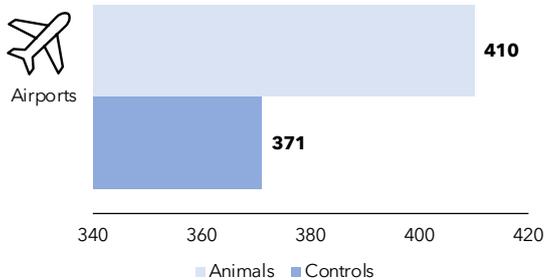
### COMMENTS

The biggest difficulty in Hungary is that the veterinarians involved in illegal dog trade are most of the time private veterinarians and not official veterinarians. Private veterinarians operate under the supervision of the Veterinary Chamber and the competent veterinary authority. Although the level of cooperation with investigating bodies has improved, the veterinary authority is not informed about the results and developments of police and prosecution investigations. In addition, there are cases where it is not possible to proceed in the absence of tangible evidence. Stricter sanctions will be taken against practices that might facilitate illegal trade i.e. issuing pet passports without the signature of the owner. Private veterinarians are aware that pets' data entered in the passport is closely monitored and actions will be taken against violators. Suggestion to put more pressure at an EU level on investigating bodies to act in order to improve future actions.

### FRAUDS DETECTED



### CONTROLS AND ANIMALS CHECKED



# IRELAND



## FRAUDS DETECTED



Grey Market, **5**



Forgery of Animal Passport and Identification, **0**

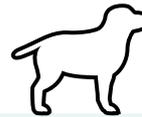


Forgery of Analytical Test Report, **1**



Forgery of Health Certificate, **1**

## ON SITE INSPECTIONS



## CONTROLS

Spot checks are made on pets arriving from countries neighboring the EU which are not with EU owners and on pets arriving from EU countries. Compliance checks are on all pets arriving from third countries at BCPs with strict appliance to rules regarding the five-day rule. Investigations into frequent flyers – possible Dog Nannies are also performed. Only quarantines (charged), rejection to origin country and euthanasia were applied as sanctions.

## COMMENTS

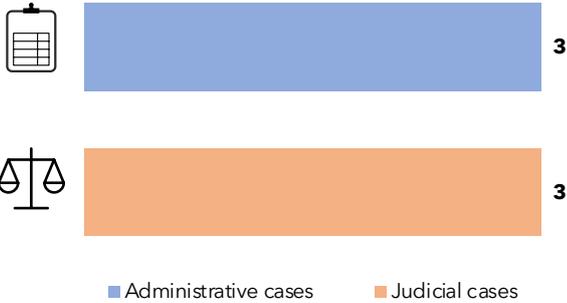
The action highlighted the general issue and increased controls, especially intra-EU controls. However, on site actions are merely a form of disrupting the transport as all suspects had correct documentation and were very 'au fait' with the legislation. Thus, it was not possible to show that apparent pets being transported were commercials. An improvement could be to ease the legislation to identify commercial consignments of small animals so that enforcement can be applied. The EU pet travel scheme needs to be tightened. Currently, it is too easy issue an EU pet passport with no proof of residency or ownership required. The level of five pets is high for non-commercial. It must be assessed if the reduction of the number will bring a benefit to control fraud. There is a lack of communication and

inconsistencies between TPOEs across the EU, with some pets not being at all checked at arrival. Establishing an EU network of recording all controls of pets (non-commercial movements from Third Countries) at TPOEs using the same format would be easier to make connections between cases and to find recurrences – however, this would have to be in line with GDPR. Requiring recording at TPOEs (or from customs to TPOEs) of data of all pets' movements and owners between Member States would greatly help in gathering intelligence related to recurrent cases. Member States also need to have some powers in deciding the level of control of such movements and the mechanisms to collect information (from owner when arriving at BCPs/TPOEs or from third party stakeholders like airline/port/rail companies and authorities) based on some factors to be more detailed than currently in the EU legislation. Some stakeholders are reluctant in sharing information, so the obligation of cooperation with Member States authorities and to report the required data must become obligatory. Finally, the availability of national microchip databases for pets under a single platform at the EU level would improve greatly the quality of official controls. The cooperation with customs through the creation of Risk Information Forms for example, would need to be explained more in details. Trainings for the use of iRASFF or other tools would need to be led by the mid of the CCP to allow some time to produce benefits for the coordinated action.

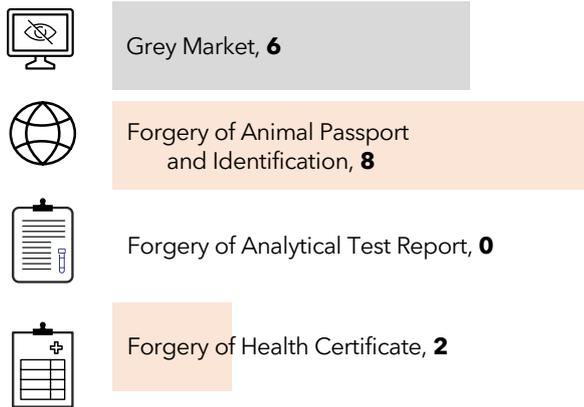
# ITALY



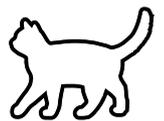
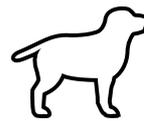
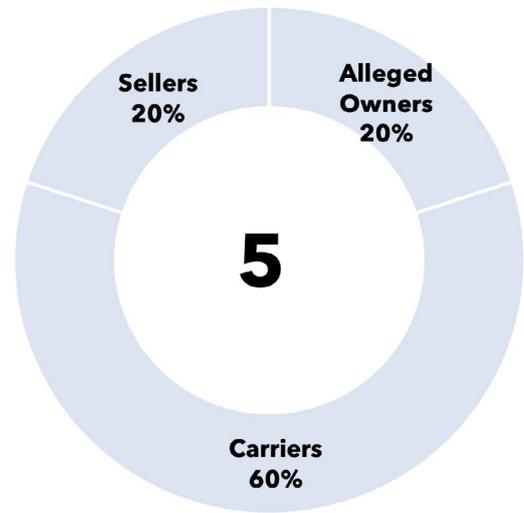
## ADMINISTRATIVE AND JUDICIAL CASES



## FRAUDS DETECTED



## ON SITE INSPECTIONS



## COMMENTS

The action has helped improving cooperation between the local and central authorities at national level, as well as information sharing with other countries. The most difficult part was collecting information from private citizens about transporters, payments, and online advertisements. It would be important to strengthen European legislation on pet trade, especially considering the impact of e-commerce, in order to harmonize case management and to improve collaboration between Member States in cross-border investigations. Additionally, collaboration with Third Countries should be developed further.

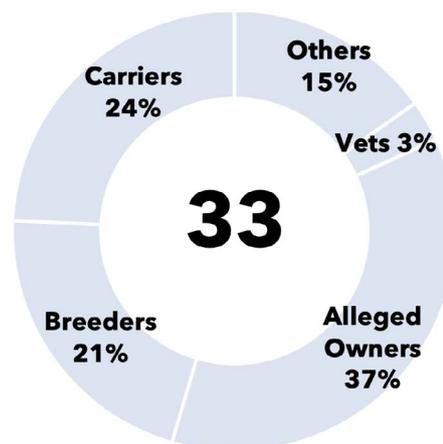
## € FINES

Road controls fines were about €1.300.

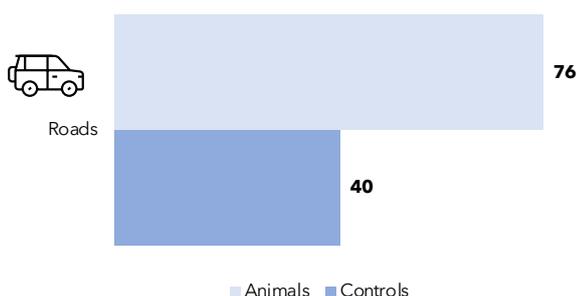
# LATVIA



## ON SITE INSPECTIONS



## CONTROLS AND ANIMALS CHECKED



## COMMENTS

The action improved frequency of controls. It strengthened the cooperation of internal service and the operative exchange of information with customs, as well as competent authorities of other member states, especially with colleagues from Lithuania, Poland and Estonia. Many pets enter through Latvia's borders from Russia and Belarus. However, considering the political situation, the main difficulties were little communication with the competent institutions of Belarus and Russia to carry out traceability checks of the imported animals. There have been cases where inappropriate antibody titers were detected for animals imported from these countries. A system must be developed that prevents the countries in the EU from registering an animal originating from a third country without a corresponding model of non-commercial certificate, like TRACES. To reduce the risk of possible epizootic threats, considered limited cooperation, limited animal traceability, and low reliability of accompanying veterinary documentation, the solution would be a ban on importing animals from Russia and Belarus. Additionally, to ensure the improvement of control and traceability, it would be necessary to develop and implement a single EU pet register with full access to information.

## FRAUDS DETECTED



11 cases of Grey Market involving 16 animals were reported.



50 **ADMINISTRATIVE CASES** have been initiated for violation of pet trade requirements.

## FINES



In 42 cases the total amount of fines applied was €1.735 . In 5 cases regarding illegal ear cropping a total amount of fines was €4.000.

## Non-commercial movement of cats and dogs from non-EU countries

Latvia	2018	2019	2020	2021	2022
non-commercial (pets)	3860	5244	1911	1920	4508
non-compliant (returned to country of origin)	3	45	19	29	42
commercial (animals)	269	847	6827	19606	16650
non-compliant		29	132	202	88

# LITHUANIA



## CONTROLS

Throughout the action, analysis of pet movement data allowed to detect disguised commercial movements for 33 operators. Customs were warned and enhanced controls were carried out. More than 7000 advertisements were investigated with more than half being suspicious and over 800 of them blocked.



### FINES

15 fines were applied.

## ADMINISTRATIVE CASES



■ Administrative cases    ■ Administrative cases with cross-border aspect

## CONTROLS AND ANIMALS CHECKED



Borders

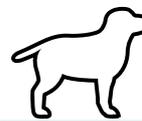
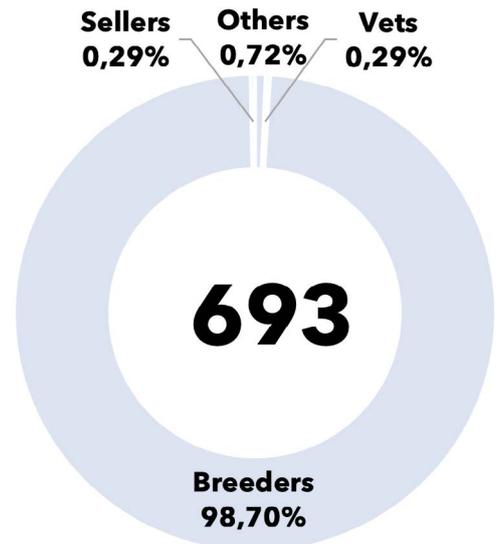


Airports



■ Animals    ■ Controls

## ON SITE INSPECTIONS



## COMMENTS

The main problems encountered in the commercial transport of pet animals from third countries:

- It is not possible to determine whether the consignment will indeed reach the intended recipients. There exists no obligation to verify the destination address, and there is a lack of mandatory checks at the place of destination.
- There is regulatory ambiguity around the certification of pet animals when they are transported from assembly centres, especially when their origin may lie outside the certifying country. For instance, Belarus might serve as the consignor, yet the animal could have originated in places like Georgia or Kazakhstan. EU legislation does not specify the duration an animal must remain in the certifying country in order to change its origin.
- Third countries do not have the possibility to include establishments or assembly centres of origin into the TRACES-NT system, as stipulated in the health certificate for entry into the EU.

### Non-commercial movement versus commercial transport (from non-EU countries)

Lithuania	2019	2020	2021	2022	2023 (until Nov)
<b>non-commercial (pets)</b>	5987	1520	2598	9543	8637
<b>non-compliant</b>	108	24	109	23	19
<b>commercial (consignments)</b>	13	92	4337	5119	3719
<b>non-compliant</b>				57	63

Animals checked at the border when arriving directly from a third country either through a BCP or a Travellers' Point of Entry. Data excludes inner market.

Both COVID-19 pandemic and the war in Ukraine had influence on presented numbers.

# NETHERLANDS



## FRAUDS DETECTED



Grey Market, **0**



Forgery of Animal Passport and Identification, **0**

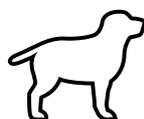
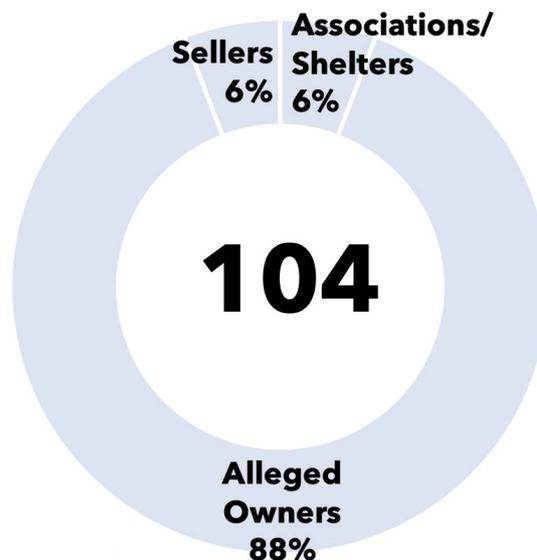


Forgery of Analytical Test Report, **20**



Forgery of Health Certificate, **8**

## ON SITE INSPECTIONS



## CONTROLS

In 2022, 104 inspections were carried out based on notifications of import from high risk (rabies) areas.

## COMMENTS

A general challenge within the EU Control Action is the shortage of resources: not enough time and personnel. In the Netherlands, costs of quarantine can reach up to €2.000 at imports where no fine is initiated. In relation to this, sanctions cannot easily be implemented as generally it is the owner who ends up with the consequences of the fraud committed by traders/ breeders/ veterinarians. More resources should be allocated to online advertising researches and EU communication towards citizens. Additionally, it was not easy to apply the procedure to create a Risk Information Form since it has to be done by a different team.

# NORWAY

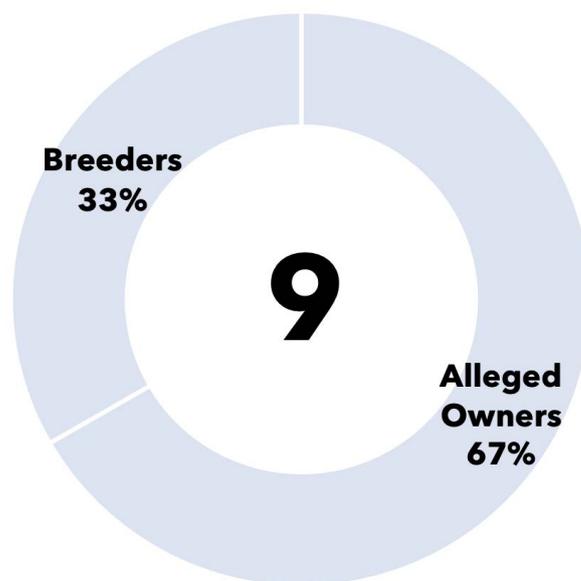


## ADMINISTRATIVE CASES



■ Administrative cases   ■ Administrative cases with cross-border aspect

## ON SITE INSPECTIONS



## FRAUDS DETECTED



Grey Market, 3



Forgery of Animal Passport and Identification, 6



Forgery of Analytical Test Report, 1



Forgery of Health Certificate, 6



### ADMINISTRATIVE CASES

When administrative proceedings were imposed, they were at the expense of the owner.

### CONTROLS

3978 animals were checked at Oslo airport from September 2022 to 20th December 2022. 20 Marketing announcements were analysed – 1 being taken down by the market provider and 3 leading to follow-up inspections.

### COMMENTS

The action improved cooperation especially with the Economic Crime Unit of the police taking part in the Europol EnviCrime action and raised local inspectors' awareness on the use of iRASFF for communication in cross border cases. Main difficulties encountered concerned allocation of resources (in parallel with the ongoing Ukrainian situation) and the missing of a system to tackle big coordinated criminal cases. We would need a clear agreement with the police on tackling crime cases related to animal health (not just animal welfare), who can allocate only little resources to those. Illegal pet trade and specifically e-commerce requires special investigative competences, for which a special team and more BTSF courses are needed. Within the action, we would have wanted to be able to give more open comments in the monthly reporting and felt that the action could have been kept shorter. An informal EU wide practical networking platform to exchange and discussing specific cases and best practice solutions would as well be of need. It would be useful if we could also take part with only a few regions, and not include the whole country. A future coordinated action with focus on using TRACES correctly could be of interest.

# POLAND

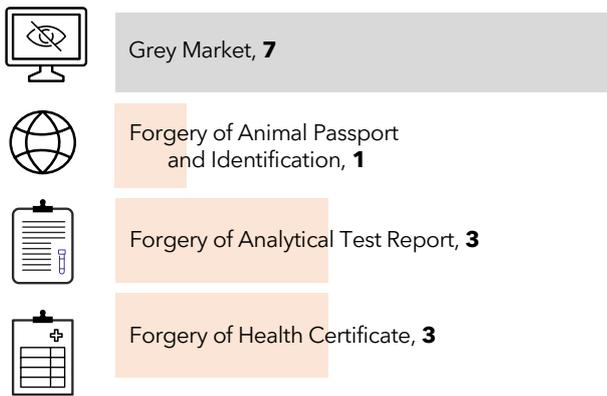


## ADMINISTRATIVE AND JUDICIAL CASES

Administrative and Judicial Cases



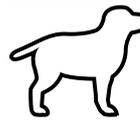
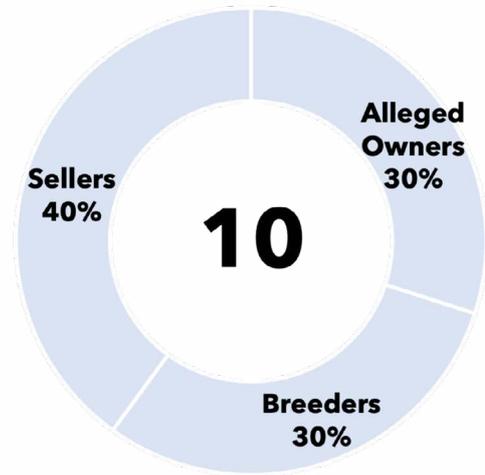
## FRAUDS DETECTED



## ANIMALS CHECKED



## ON SITE INSPECTIONS



### CONTROLS

4793 animals were rejected by custom officers (non-commercial movements) and 21 at border control posts (commercial movements). 2 Risk Information Forms were created.

### COMMENTS

The action improved cooperation between General Veterinary Inspectorate and customs authorities. Difficulties were due to the lack of legislative basis and sanctions for non-compliances and unwillingness of some authorities to cooperate perceiving these cases as unimportant. To improve the situation, microchipping and registration of animals (with information about breeders and owners) should be mandatory in one EU database. Additionally, is important to strengthen control of laboratories (sampling technique) and clarify the issue of issuing passports to non-EU pet-owners/ animals.

### Non-commercial movement versus commercial transport (from non-EU countries)

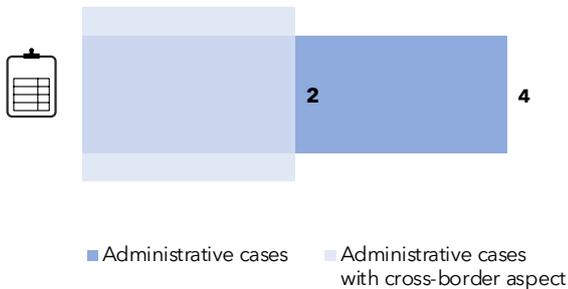
Poland	2018	2019	2020	2021	2022
<b>non-commercial (pets)</b>	25800	34411	25761	23132	56980 (41752 UA border)
<b>non-compliant</b>	346	948	1596	1851	2473 (1892 UA border)
<b>commercial (animals)</b>	481	389	648	5460	5722
<b>non-compliant</b>	-	9	23	145	104

Both COVID-19 pandemic and the war in Ukraine had influence on presented numbers.

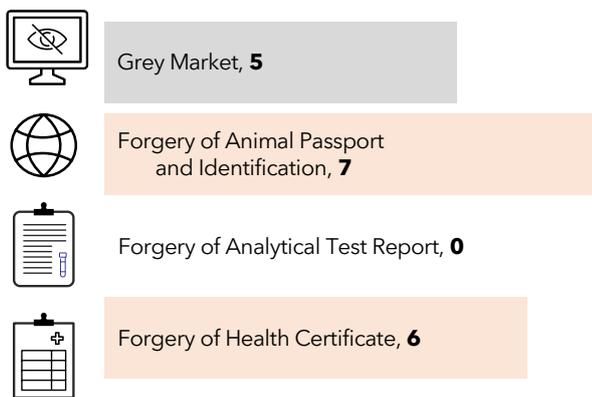
# PORTUGAL



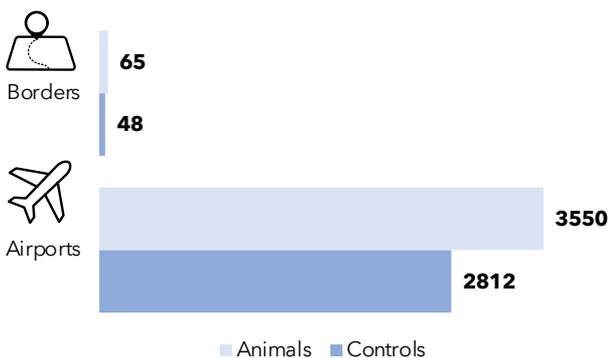
## ADMINISTRATIVE AND JUDICIAL CASES



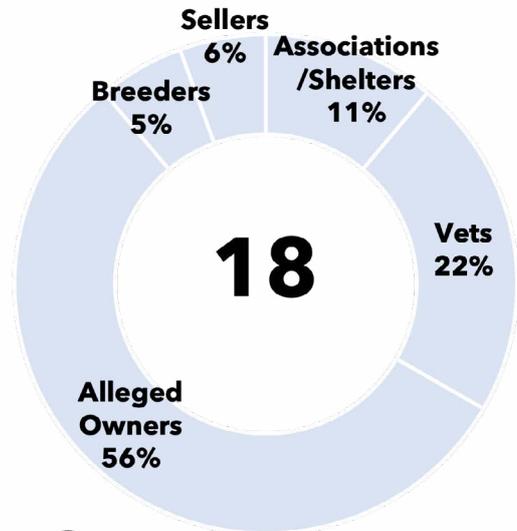
## FRAUDS DETECTED



## ANIMALS CHECKED



## ON SITE INSPECTIONS



## COMMENTS

The EU action provided very useful information and raised awareness about fraud mechanism to introduce animals illegally in European countries and opened new lines on fraud investigation. Although Portugal was not able to implement specific controls related with the action, all suspicious cases were investigated. Offenders are difficult to identify since the responsibility is diluted along the chain of trade. Dispatch of animals destined for potential adoption in other countries are a big challenge. More information should be made available to authorized veterinarians and citizens regarding passport completion and importance of complying with the rules respectively. We find that providing pet passports with instructions on how to complete them (particularly as regards the date of application and reading of the microchip, could be an improvement, once it is a situation which currently gives rise to non-compliances). Currently, electronic identification databases and international microchip search platforms are important contributions to assess the traceability of pet movements, and thus identifying anomalous situations. However, access to more information through those databases for users accredited by competent authorities would improve the searches.

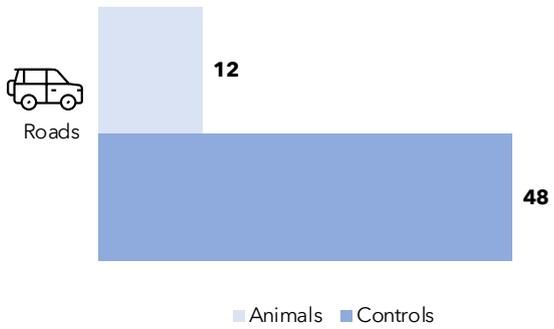
## FINES

The fines vary depending on the severity, they range between €250 and €3.740 for natural persons and between €250 and €44.890 for legal persons. Additional penalties may be imposed: removal of animals, prohibition to pursuit the profession, closure of the establishment, suspension of authorisations, licenses and permits.

# ROMANIA



## CONTROLS AND ANIMALS CHECKED\*

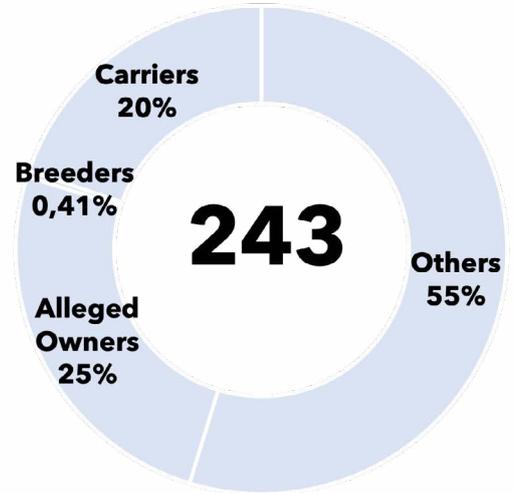


\* More controls are reported than animals as the number of animals was not available for the entire reporting period.



55 **Administrative cases** were initiated.

## ON SITE INSPECTIONS



# SLOVAKIA



## FRAUDS DETECTED



Grey Market, **1**



Forgery of Animal Passport and Identification, **1**



Forgery of Analytical Test Report, **0**



Forgery of Health Certificate, **0**

## CONTROLS AND ANIMALS CHECKED



Borders



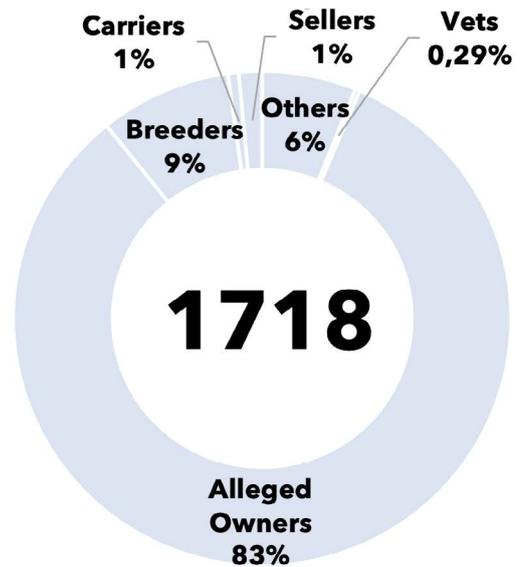
Airports

9

9

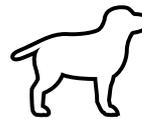
■ Animals ■ Controls

## ON SITE INSPECTIONS



Note:

The number of inspections reflects the total amount of all performed inspections in connection with dogs and cats for the given period in our territory, and unfortunately we are not able to clearly define their relationship to the trade. Especially with regard to the number of checks on the owners of these types of animals - the connection to the trade may/ may not be fulfilled.



716 **Administrative cases** were initiated.



### FINES

In 208 cases the total amount of fines applied summed up to €21.360.

### COORDINATION

The State Veterinary and Food Administration of the Slovak Republic ensured cooperation was performed with locally competent District Veterinary and Food Administrations (40 authorities) and competent Customs authorities. 2 Risk Information Forms were created.

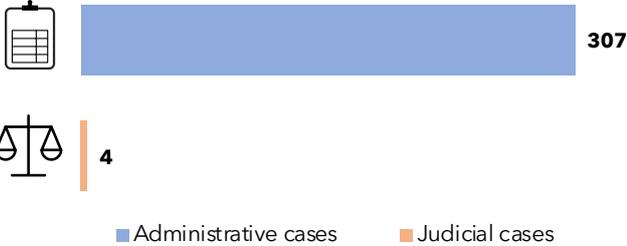
### COMMENTS

The action led to a small improvement in cooperation and frequency of controls. However, the course of the entire action was mainly based on already established processes and relations of the competent authority of the country and on its financial and personnel resources. The European Commission could have addressed the authorities of various fields (police, customs, finance, etc.) directly, in order to have a complex action, the successful organization of which does not fall only on the veterinary sector and its limited capabilities. Provided funds to support such a special action would be also very beneficial.

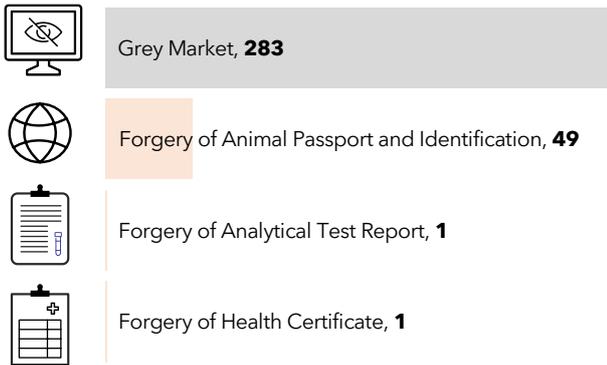
# SLOVENIA



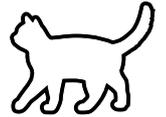
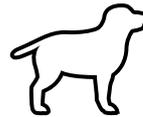
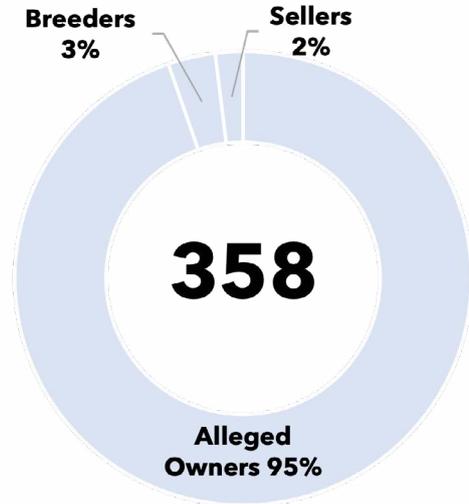
## ADMINISTRATIVE AND JUDICIAL CASES



## FRAUDS DETECTED



## ON SITE INSPECTIONS



**FINES**  
€ 106 fines were issued summing up to a total value of 49.804,16€. In addition, 47 warnings were issued.

1 Risk Information Form was created.

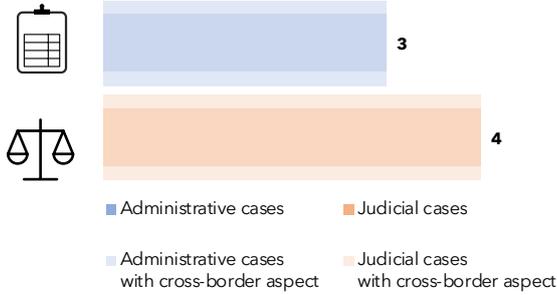
### COMMENTS

Overall cooperation with other Member States has definitely improved. However, the frequency of controls has not changed significantly, because they were and will continue to be carried out in accordance with the national annual work plan and when non-compliances are found in the process of registration of dogs, which is obligatory in Slovenia. Suggestion is to consider in the future legislation the obligatory registration of dogs, central national databases and use of transponders that start with country's ISO code. Additionally, it should be considered how to better exchange information with neighbouring non-EU countries, i.e. Western Balkans – via communication channels like specific module in iRASFF.

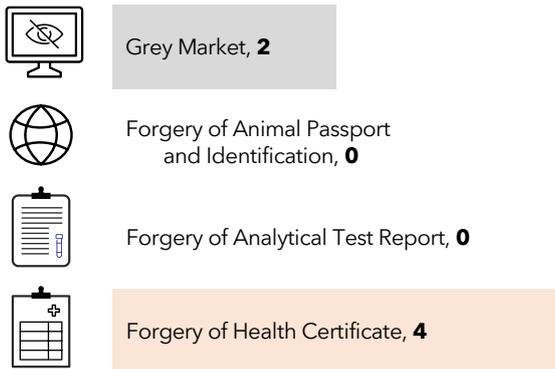
# SPAIN



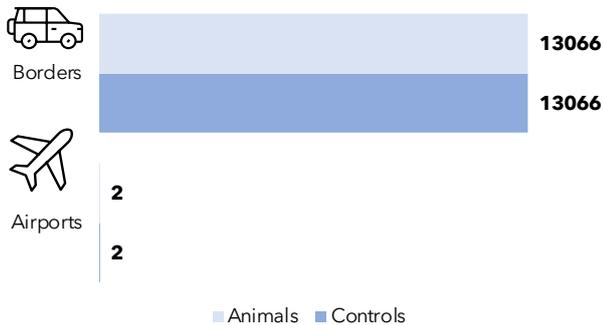
## ADMINISTRATIVE AND JUDICIAL CASES



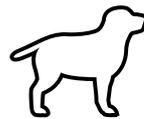
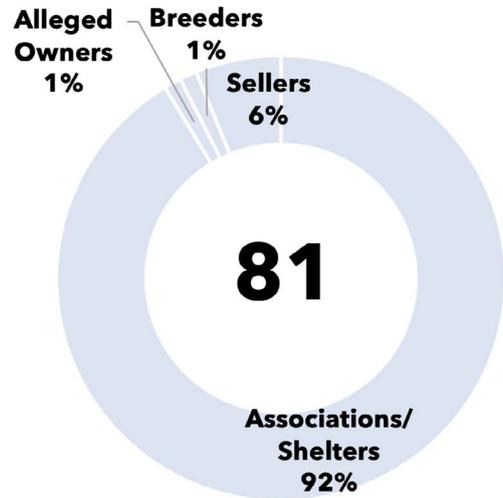
## FRAUDS DETECTED



## CONTROLS AND ANIMALS CHECKED



## ON SITE INSPECTIONS



**FINES**  
 € Different amount were charged for illegal introduction of pets depending on the nature of the movement: €3.000 for commercial movements and €600 for non-commercial movements.

## COMMENTS

The three months period after sampling for antibody titration test should be reduced to facilitate the legal introduction of pets - this would lead to a decrease in the forgery of laboratory reports. It is also essential to train the veterinarians in third countries, so they are aware of the EU requirements for entry. At EU level, private veterinarians are not aware of the EU conditions for the movements of pets. Finally, raising awareness among citizens is necessary to avoid their participation in illegal movement of pets.

## SWEDEN



### CONTROLS

Sweden was not able to allocate resources to take an active part in the action. However, regular controls and checks were maintained. For instance, in 2022 the competent authority processed 504 cases involving a total of 739 dogs and cats that were brought to Sweden without fulfilling the requirements for movement.

### COMMENTS

Currently, agencies in different EU-countries have no way of knowing how an EU-pet passport issued by another Member State is supposed to look (while regulation 577/2013 has specifications, there are still openings for certain cosmetic differences) or which serial numbers are used. A database accessible by competent authorities with such information could be valuable.



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