

EU Platform on Animal Welfare Voluntary Initiative Group on health and welfare of pets in trade

Recommendations on the identification and registration of dogs

Background

The pet passport system remains, in many ways, a welcome creation. It has allowed millions of owners to travel with their dogs and cats from Member State to Member State, and to and from the European Union to certain third countries, either for holidays, or for relocation.

However, ever since its application in July 2004, this non-commercial system has also opened new avenues for those who wish to trade dogs and cats illegally for purely commercial gain, circumventing the proper channels to legally and safely trade these animals. With time some of these avenues became recognised by the European Commission as organised crime¹. Law enforcement authorities, veterinarians, non-governmental organisations, charities and individual citizens have had to deal with the consequences, both in terms of the animal and public health threats, and with the adverse impacts to animal welfare.

In short, this illegal trade has been facilitated by inherent flaws in the pet passport system, particularly with regards to the lack of minimum identification and registration requirements, and the means and methods to share information between systems across the European Union.

The two fundamental flaws in the system remain, that urgently need to be addressed:

1. The ambiguity of the age of the animal as laid down in the pet passport (resulting in a questionable vaccination status), and,
2. The inability to validate the animal's identification due to the lack of a registration obligation and absence of harmonisation and compatibility of the different national and regional identification and registration systems.

The study on the welfare of dogs and cats involved in commercial practices performed in response to Council Conclusions of 2010, undertaken at the request of the European Commission, noted that "the lack of systematic identification and registration and the absence of coordinated monitoring of the movement of pet animals makes the trade of dogs and cats non-transparent"².

On 25 February 2016, the European Parliament adopted a Resolution³ noting that compatible systems for the identification and registration of dogs and cats in the EU would reduce the scope for document falsification and illegal trading, thus improving animal welfare, protecting public and animal health and providing for effective intra-EU traceability. The European Parliament also called on the Commission to, after entry into force of the Regulation (EU) 2016/429 on transmissible animal diseases (the 'Animal Health Law') to lay down rules pursuant to Articles 109 and 118 of the act concerning detailed compatible systems for the means and methods of identification and registration of dogs and cats.

¹ European Commission, Press release, 14 April 2021: "*Fight against organised crime: New 5-year strategy for boosting cooperation across the EU and for better use of digital tools for investigations*"
https://ec.europa.eu/commission/presscorner/detail/en/ip_21_1662

² Study on dogs and cats involved in commercial practices: https://ec.europa.eu/food/sites/food/files/animals/docs/aw_eu-strategy_study_dogs-cats-commercial-practices_en.pdf

³ European Parliament resolution of 25 February 2016 on the introduction of compatible systems for the registration of pet animals across Member States ([2016/2540\(RSP\)](#))

The Parliament's call was referred to in a discussion paper presented in the Council's Working Party of Chief Veterinary Officers in October 2017 on behalf of Germany, the Netherlands, Sweden, Denmark and Belgium, receiving widespread support other Member States present. It was also this paper that led to the formation of this present Voluntary Initiative Group.

The agreed position of the Voluntary Initiative Group:

As stated through its objectives at the time of formation, the Voluntary Initiative Group on Health and Welfare of Pets in Trade aims at working towards greater interchangeability of systems of I&R, to enable electronic data exchange & traceability, and assessing the need for legal harmonisation so that pets can continue to travel with their owners as intended, but so that the system is no longer open to criminal abuse or organised crime.

As such, we collectively note that:

1. There is a **lack of harmonisation of rules on the use of transponders**: The compatibility with the ISO 11784 standard is the only requirement stipulated in the current Regulation⁴. As a consequence, fundamentally different identification systems have been developed across the Member States. Furthermore, in a majority of Member States there is no proper regulation on the use of ISO 11784 for the identification of pets meaning that:
 - a. Hardly any of the existing systems can guarantee the uniqueness of the code as it is commonplace to delegate to manufacturers the responsibility to provide unique codes, with many manufacturers therefore providing false or duplicate codes. Consideration of the OTP (one time programmable) transponders is essential to guarantee uniqueness of the code.
 - b. At present, hardly any of the existing systems require the pet passport number to be permanently associated with the transponder code⁵.
2. There are **at least 23 different national or regional databases** which are not compatible with one another and with no common serial number structure for pet passports.
3. **Passports are not routinely issued at the point of identification and registration** and the current law does not limit the buying and application of a transponder to veterinarians only. Qualified people can be defined differently by each Member State and it is not always clear which body is responsible.
4. There are **no minimum identification and registration requirements across all Member States (e.g. before 10 weeks)** to determine by what age of the animal and by whom the initial registration should be conducted, nor appropriate timeframes for re-registration with new keepers.

The way forward

In light of the above, the Voluntary Initiative Group encourages the European Commission to use its powers under Article 109 and 118 of the Animal Health Law to lay down the following requirements on the means and methods of identification and registration of dogs, as well as for the transfer of compatible information from databases.

The Voluntary Initiative Group requests the European Commission to:

1. Standardise the requirements for the coding of the transponders, conforming with ISO 1174, 11785 and 3166.
2. Ensure that all dogs have to be identified and registered within a maximum specified timeframe by either a veterinarian or other qualified person (the breeder must be responsible for ensuring this is done initially), and to agree on minimum requirements for the re-registration of the keeper.
3. Ensure that every transponder (unique number) is linked with a pet passport (unique number). Transponders should only be sold under strict supervision, and registered, so it is known which veterinarians or other qualified persons bought which transponder.
4. Provide for a common data interface for databases, thus enabling the access to common basic data from any database, on the request by a competent authority (often following a query/request from a veterinarian).

⁴ Regulation (EU) No 576/2013 on the non-commercial movement of pet animals

⁵ From October 2021 there will be such a requirement in the Netherlands