



## **Position on the European Commission's study on the welfare of dogs and cats involved in commercial practices**

April 2016

### **1. About the EU Dog & Cat Alliance**

The EU Dog & Cat Alliance represents over 55 organisations from over 20 countries of the European Union. This includes veterinary organisations, organisations which are involved in the rescue/rehoming of dogs and cats and organisations which are working to protect dog and/or cat welfare. The Alliance's main focus is on improving EU legislation in relation to dogs and cats.

### **2. Background**

In 2014, the European Commission funded a [study](#) on the welfare of dogs and cats involved in commercial practices. The results were published in March 2016.

The purpose of the study was to collect and analyse information on breeding, keeping and trade of dogs and cats in EU Member States and **to determine the extent to which the EU should take initiatives** to protect the welfare of dogs and cats involved in commercial practices.

The study collected data from 12 "representative" EU Member States<sup>1</sup>. Stakeholders surveyed via questionnaires included breeders, breeder organisations, NGOs, dog trainers, veterinary organisations, private veterinarians, dog and cat shelters, as well as citizens, who were all able to submit their feedback online. The study also consulted expert panels and secondary literature.

### **3. Findings of study**

The study identified **five main areas of concern** which could potentially place at risk the welfare and health of dogs and cats:

- **Breeding**
  - The lack of specific legislation on breeding and keeping, and varying requirements for registration of breeders and dealers in EU Member States, constitutes a risk for animal welfare, and can also affect the functioning of the internal market as standards are not harmonised
- **Transport**
  - Animal movements are one of the main risk factors for the spread of animal diseases. This risk increases with the volume of uncontrolled movements, such as

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<sup>1</sup> Belgium, France, Germany, Hungary, Italy, the Netherlands, Poland, Romania, Slovakia, Spain, Sweden and the United Kingdom.



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the non-registered pet trade. National standards on welfare during transport for commercial purposes which go further than the very basic requirements of Council Regulation (EC) No. 1/2005 are a rarity. Better implementation of existing legislation could lead to improved animal welfare

- **Lack of knowledge and information for the keeping of pets**
  - Less than a fifth of prospective owners reported being well informed about animal health and welfare, including EU rules on traveling with pets, intra-EU trade, zoonoses and consumer rights at the time of purchase of a dog or cat. Appropriate information on the health and welfare of the animals and on consumer rights at the time of purchase could help to improve the weak position of consumers which at present leads to a lack of compensation
  
- **Discrepancies in market data of pets**
  - The study estimates that around 46,000 dogs are traded between EU Member States every month. This contrasts sharply with the registrations in the Commission's TRACES system, which in 2014 registered a total of only 20,779 dogs and 2,287 cats involved in intra-EU trade. The considerable difference between these figures is a matter of significant concern
  
- **Consumer protection**
  - The majority of citizens surveyed in the study called for the EU to take action in the area of consumer protection
  - Under EU consumer protection legislation, consumers are granted a six-month period in which to raise complaints of defects. This does not protect consumers as inherited disorders and behavioural problems may not become apparent until later
  
- **Other findings**
  - Identification and registration would be a vital tool to provide traceability and help to address irresponsible commercial practices. In order to trace dogs and cats they would first have to be identified and registered. Monitoring their movements between Member States is currently difficult as there are no linked or harmonised traceability systems across the EU
  - Most citizens indicated that further action to improve pet welfare in their country is needed. **The preferred body to implement this is the EU** and national competent authorities
  - Different standards and rules on the welfare of pets in Member States cause distortions of the internal market. High standards of pet welfare in some Member States increase prices and lead to a competitive advantage for those businesses operating in Member States with lower standards
  - **Citizens, breeders, dealers, animal shelters and veterinarians all expressed a need for better EU-wide identification and registration of dogs and cats**



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#### **4. General position**

The EU Dog & Cat Alliance welcomes the focus on companion animals in this study. The Alliance strongly supports the key finding that **the EU should take action to protect companion animal welfare**. This is supported by the views of EU citizens. According to Special Eurobarometer 442, published in March 2016, **74% of Europeans believe the welfare of companion animals should be better protected** than it is now.

However, we are **very concerned by the lack of recommendations** in the study. It is unclear what follow-up is planned by the European Commission. The study suggests that, firstly, there is a need for proper enforcement of the legislation, and secondly, that an exchange of knowledge between Member States would be of considerable benefit. In some areas, EU legislation should go further than it does at present. **The Alliance would therefore like to see more concrete commitment from the European Commission and specific plans on how it plans to tackle the issues uncovered in the study.**

#### **5. EU Dog & Cat Alliance recommendations for follow-up**

To this end, the EU Dog & Cat Alliance has developed a set of concrete recommendations:

1. The Alliance urges the European Commission to ensure that **animal welfare is a priority**, including in the development of a **new Animal Welfare Strategy 2016-2020** and commitment to the creation of an **Animal Welfare Platform** as proposed by a number of Member States, both of which should explicitly cover companion animals
2. The Alliance calls on the European Commission to draw up an **Action Plan to tackle the illegal trade in dogs and cats in the EU**, including conducting an Impact Assessment. The Action Plan should cover the following:
  - Addressing the serious consumer protection issues arising from illegal trade in companion animals through: public education campaigns on buying pet animals, improving EU consumer protection legislation for the trade of pets and ensuring its better enforcement across all Member States
  - Concrete steps to ensure that commercial practices involving dogs and cats do not result in zoonoses being spread in the EU, including not only rabies and *Echinococcus multilocularis*, but also ones that are not covered by EU legislation, such as leishmaniosis
  - Regarding the illegal importation of young dogs and cats, intelligence to be shared between agencies (including veterinary regulatory authorities), carriers, customs



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officials and veterinarians and acted upon where necessary as part of nationwide/EU-wide multi-agency strategy to tackle the problem; treating this issue as a serious trafficking offence, comparable to the trafficking of drugs, firearms or wildlife

- Appropriate controls on the internet trade of dogs and cats
  - Compulsory licensing of dog and cat breeders and harmonised EU standards for dog and cat breeders, covering the conditions in which dogs and cats are kept
3. The Alliance would also like to see the Commission progress with a **delegated act** under the Animal Health Law on **compulsory permanent identification and registration of dogs and cats on an appropriate national or regional database, which would be linked to an EU database.**