



Presentation to the Joint Committee on Agriculture, Food and the Marine on the Online Sale and Supply of Pets

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Introduction

Chairperson, members of the committee, I would like to thank you for inviting Dogs Trust to speak to you today and welcome the Joint Committee's timely focus on this serious matter.

Dogs Trust is Ireland's largest dog welfare charity. Guided by our founding principle to ensure all dogs can enjoy a happy life, free from the threat of unnecessary destruction, we invest substantial resources in education and responsible dog ownership initiatives.

In 2020 we rehomed 1,159 dogs through our National Rehoming Centre in Finglas, Dublin and our regional rehoming programme. We also provide free Education Workshops throughout Ireland teaching children and adults about responsible dog ownership and safety around dogs.

In November 2020, Dogs Trust launched a petition campaign which sought to highlight the cruelty and deception currently surrounding the illegal selling and advertising of dogs and puppies online. The issue was acutely brought to the fore during the pandemic with the high demand for buying new dogs. The campaign hit a nerve among the public and gathered huge support with the accompanying petition receiving over 52,000 signatures.

State of Play

Over recent years Dogs Trust has witnessed a significant increase in the number of dogs advertised online. The full size of the online trade in dogs – through advertising platforms and areas of sites such as closed groups on Facebook, can only be speculated upon; however, it seems certain to run in to the thousands of dogs advertised for sale online at any one time.

Dogs Trust campaigned for and very much welcomed the introduction of new Rules on the Sale, Supply and Advertising of Pet Animals which were fully enacted in February 2020. We believe that it is an extremely encouraging step towards shaping



a safe and secure channel for the public to buy a dog, if they feel that is the best avenue for acquiring a dog as a companion animal.

However, since coming into force, our frequent auditing of online platforms that advertise dogs for sale has indicated that platforms and sellers have not fully implemented the Rules and that these Rules are not being enforced by the authorities. This might include a missing microchip number or an obviously forged number; no details on the country of origin of the dog; no registration number or dog breeding establishment number, where it is obvious the seller falls under the requirements of the Dog Breeding Establishment Act.

Dogs, as a companion animal, remain in a type of 'no man's land' – they are not considered livestock and subject to the traceability that would normally be associated with this cohort. Similarly, dogs are not a consumer product, so no VAT or invoicing or similar requirements is mandated at the point of purchase. However, dogs are much loved family pets and so we firmly believe the implementation of better systems are needed for all dogs being advertised.

Put simply the status quo lets unscrupulous sellers and breeders off the hook and propagates poor dog welfare practices.

Traceability

I would like to communicate to the Committee today one fundamental tool that we strongly believe would act as a catalyst to strengthen the existing rules and deliver on its objectives to develop a safe and secure environment for advertising dogs.

Verifiable and accessible traceability of the dog and the seller would be a game changer for the online advertising of dogs. It can serve as a tool to unlock wider dog welfare and consumer protection issues, such as dog theft; poor breeding practices; buyers' rights; and tax records.

If the public can be assured that the dog being advertised in the accompanying photo has been verified as the correct dog or can verify the seller is sufficiently registered with the Department; the local authority or as a charity, this will bring structure and order to what are otherwise ad hoc and exploited practices.

A mechanism whereby all online platforms that advertise the sale of dogs online employ a verification process before the advertisement goes live would provide this solution and is already being explored by some databases, online platforms and NGOs.



We would encourage this Committee to investigate and support this solution, encouraging the four microchip databases and prominent online advertisers to adopt this technology as soon as possible.

To quickly outline the possible solutions this mechanism would provide:

1. Poor breeding practices

If all registered Dog Breeding Establishment license holders (Dog Breeding Establishment Act 2010) disclose their license number, as required under the Rules, then potential buyers have the option to look and see who the license holder is and how many breeding bitches are licensed to the holder by the local authority. Instead, people are conned into thinking they have bought a new pet puppy bred in a family home, as opposed a business purposefully breeding dogs in large volumes.

At the moment potential new dog owners are not shown the DBE license number in the vast majority of online ads, and the majority of local authorities do not have a list of DBE's available online. Covid-19 restrictions aside, this is an archaic system that only benefits unscrupulous breeders who hide behind the façade of websites, social media and classified ads.

2. Dog theft

Department of Justice 2020 data shows there has been a rise in dog theft. A total of 244 dogs were reported stolen to Gardaí in 2020 - a 16% rise on the year before. Where the Rules on the Sale, Supply and Advertising of Pet Animals can act as a major barrier to the reselling of stolen dogs for hugely inflated prices – we strongly believe this lies in a robust traceability and verification process.

A thief cannot resell a dog online if a rigorous procedure is in place to verify the microchip number before the advert goes live. Of course, the thief can sell the dog via other channels but removing the increasingly large share of the market and importantly cleaning up the online marketplace so that potential dog owners are told not to use other channels, will severely stifle unscrupulous sellers.

3. Consumer protection

Preferably, the traceability system that Dogs Trust would like to see in the future would allow for the creation of a centralised register where interested parties can easily access the key information for each DBE license holder or registered seller or supplier with the Department. This becomes a fundamental consumer rights issue.



Consumers are entitled to have their rights and interests protected by law. Under Irish law it is a criminal offence for any trader to make a false or misleading claim about goods, services and prices. It is also an offence to sell goods which bear a false or misleading description. Yet these are the practices that remain widespread in large part due to the lack of traceability and enforcement.

4. [Tax records](#)

As we believe that most sales are with cash, the creation of such a database would not only tackle the illegal sale of dogs via online adverts it would also make it much more difficult for unscrupulous dog breeders to avoid paying tax. Full implementation of the Department's rules would ultimately serve to curtail criminal activity in this industry and ensure full disclosure of tax returns, benefiting the public purse.

The UK Government has set up a Pet Theft Taskforce and it has been reported in the media that one option being considered is a ban on purchasing a pet with cash. The taskforce will report on its findings and recommendations in summer 2021 but this demonstrates that big picture thinking around traceability is key.

Final comments

As things stand, Ireland has a great opportunity to build on current rules to shape the online advertising and sale of dogs ecosystem making sure it is forward-looking and a frontrunner for dog welfare in Europe and beyond.

Thank you for your time and I look forward to answering your questions during our discussion.