

BVA Northern Ireland Branch, BSAVA and NIVA response to the Department of Agriculture, Environment and Rural Affairs (DAERA) consultation on the sale and supply of puppies and kittens in Northern Ireland

Question 1: Do you agree that any person who wishes to sell, give away, or otherwise transfer the ownership of puppies should be required to register with their local council?

Yes.

- 1) BVA, BSAVA and NIVA support the proposal that any individual who sells, gives away, or otherwise transfers ownership of puppies (as defined under The Welfare of Animals (Dog Breeding Establishments and Miscellaneous Amendments) Regulations (Northern Ireland) 2013) should be required to register with their local council. This is a vital step toward improving traceability, supporting enforcement, and promoting responsible breeding and ownership practices.
- 2) While we recognise the value of a registration system, we believe it must be part of a holistic approach to effectively address the complex welfare issues associated with the breeding and sale of puppies. We are encouraged by the inclusion of additional measures, such as the publication of a publicly accessible register of any individual who sells, gives away, or otherwise transfers ownership of a puppy and the mandatory inclusion of an individual's registration number in advertisements. However, the system would be further strengthened when working in tandem with the proposed microchipping reforms. In particular, the plan to link microchipping records to the registration number of any breeder, whether they are registered through the proposed system or licensed as a commercial breeder under The Welfare of Animals (Dog Breeding Establishments and Miscellaneous Amendments) Regulations (Northern Ireland) 2013, will significantly enhance traceability through the provision of real-time updates. This integration will make it easier to track puppies back to their original source, especially in cases involving welfare concerns or illegal sales.
- 3) Efforts should also be made to improve education among the general public to help prevent issues that can arise from purchasing a puppy from an irresponsible breeder or from being unprepared for the long-term responsibility of pet ownership, which can ultimately lead to the puppy being rehomed. We advise anyone buying or selling a puppy to use the freely downloadable [Puppy Contract](#), which has been developed by the RSPCA and the Animal Welfare Foundation (AWF) to empower puppy buyers and help them to avoid the problems that can arise from buying a puppy from an irresponsible breeder.
- 4) For these proposals to be effective, they must be backed by adequate resourcing and training for enforcement bodies, particularly to cover aspects of animal welfare, and be further supported with the application of meaningful penalties to deter non-compliance. The proposed penalty cap of £5,000 is unlikely to be sufficient to deter commercial offenders, given the high market value of certain breeds of puppies. This is especially stark when contrasted with the unlimited fines available under equivalent legislation in England and

Wales (Animal Welfare Act 2006) and fines of up to £40,000 in Scotland (The Animal Welfare (Licensing of Activities Involving Animals) (Scotland) Regulations 2021).

- 5) There is an opportunity to enhance enforcement through randomised and unannounced spot checks of both registered-only and licensed breeders (dependent on the level of mandatory breeding establishment inspections already in place). Checks could also be prompted following complaints to a Council from members of the public or prospective owners about the welfare of animals on the registered premises. Further flags for checks could be a high number of puppies for sale, or a high number of sales from a registered premises. Additionally, a routine, mandatory dog breeding licensing inspection should be triggered if the threshold of three or more litters per year is met. Adequate resources and enforcement powers must be provided to support the system, in particular during the initial stages, as local councils may otherwise lack the capacity to identify non-compliant breeders or respond effectively to complaints.
- 6) While strengthening breeding regulations in Northern Ireland is essential for improving animal welfare, and we welcome the recent appointment of an expert advisory group to review existing Dog Breeding Regulations in Northern Ireland, it may also unintentionally increase reliance on imported puppies and drive some activity underground if not supported by complementary measures. Northern Ireland remains a key route for smuggled puppies into Great Britain, with traffickers exploiting gaps and the lack of border checks with the Republic of Ireland.
- 7) It is also important to consider the impact of registration requirements on individuals who may have a single, unplanned litter of puppies. While traceability and accountability are essential, the system must be proportionate and not discourage responsible individuals from engaging with it. Over-reliance on professional breeders could inadvertently narrow the gene pool, increasing the risk of inherited health conditions. A balanced approach that allows for occasional, well-managed litters from non-commercial breeders can help maintain genetic diversity and support overall breed health.
- 8) To ensure the success of the registration system, a strong and accessible communications campaign is essential. The process must be clearly explained and not perceived as overly burdensome. If the system is seen as too complex, there is a real risk that individuals may avoid registration altogether, perhaps even leading to the abandonment of puppies. Clear guidance, user-friendly processes, and public education will be key to encouraging compliance and safeguarding animal welfare.

Question 2: Do you agree that any person who wishes to sell, give away, or otherwise transfer the ownership of kittens should be required to register with their local council?

Yes.

- 9) BVA, BSAVA and NIVA support the proposal that any individual who sells, gives away, or otherwise transfers ownership of kittens should be required to register with their local council. As with puppies, this measure is essential for improving traceability, supporting enforcement, and promoting responsible breeding and ownership practices.
- 10) Efforts should also be made to improve education among the general public, to help prevent issues that can arise from purchasing a kitten from an irresponsible breeder or from being unprepared for the long-term responsibility of pet ownership, which can ultimately lead to the

kitten being rehomed. We advise anyone buying or selling a kitten to use the freely downloadable [Kitten Checklist](#), which has been developed by The Cat Group to empower kitten buyers and help them to avoid the problems that can arise from buying a kitten from an irresponsible breeder.

- 11) For these proposals to be effective, they must be backed by adequate resourcing and training for enforcement bodies, particularly to cover aspects of animal welfare, and be further supported with the application of meaningful penalties to deter non-compliance. The proposed penalty cap of £5,000 is unlikely to be sufficient to deter commercial offenders, given the high market value of certain breeds of kittens. This is especially stark when contrasted with the unlimited fines available under equivalent legislation in England and Wales (Animal Welfare Act 2006) and fines of up to £40,000 in Scotland (The Animal Welfare (Licensing of Activities Involving Animals) (Scotland) Regulations 2021).
- 12) There is an opportunity to enhance enforcement through randomised and unannounced spot checks of registered breeders. Checks could also be prompted following complaints to a Council from members of the public or prospective owners about the welfare of animals on the registered premises. Further flags for checks could be a high number of kittens for sale, or a high number of sales from a registered premises. Adequate resources and enforcement powers must be provided to support the system, in particular during the initial stages, as local councils may lack the capacity to identify non-compliant breeders or respond effectively to complaints.
- 13) While strengthening breeding regulations in Northern Ireland is essential for improving animal welfare, it may also unintentionally increase reliance on imported kittens and drive some activity underground if not supported by complementary measures. Northern Ireland remains a key route for smuggled companion animals, with traffickers exploiting gaps and the lack of border checks with the Republic of Ireland.
- 14) It is also important to consider the impact of registration requirements on individuals who may have a single, unplanned litter of kittens. While traceability and accountability are essential, the system must be proportionate and not discourage responsible individuals from engaging with it. Over-reliance on professional breeders could inadvertently narrow the gene pool, increasing the risk of inherited health conditions. A balanced approach that allows for occasional, well-managed litters from non-commercial breeders can help maintain genetic diversity and support overall breed health.
- 15) Some key differences in the context of cat breeding may make enforcement of the proposals more challenging. We note that, unlike dogs, cats in Northern Ireland are not currently subject to compulsory microchipping. For the proposed registration system to be effective in improving traceability, we strongly recommend that microchipping of kittens be made mandatory in parallel with these reforms. Although kittens may not be old enough to be microchipped before being sold or transferred by a breeder, similar to legislation in England (The Microchipping of Cats and Dogs (England) Regulations 2023), there should be a requirement for microchipping to take place before the kitten reaches 20 weeks of age, unless there is a valid reason for exemption.
- 16) In addition, there is currently no licensing requirement for cat breeders in Northern Ireland, therefore, there are no mandatory inspections, a key safeguard for ensuring welfare standards are met. The proposed registration system risks legitimising poor breeding practices by unscrupulous breeders, and consideration should be given to applying the same thresholds for licensing for cats as there are currently for dogs, i.e. breeders/sellers to be

licensed and inspected if breeding, advertising for sale or supplying three or more litters per year or if advertising a business of breeding or selling cats.

Question 3: Do you agree with the proposed list of exempted groups that will be exempt from the proposed new rules? If not, which groups do you believe should be exempted?

Yes.

- 17) BVA, BSAVA and NIVA are supportive of the exemption for rescue and rehoming charities, as long as this exemption is supported by clear definitions, oversight and enforceable penalties for the misuse of charity status, to avoid loopholes.
- 18) As acknowledged within the proposal, rescue and rehoming charities can play a vital role in rehabilitating unwanted or abandoned puppies and kittens and finding new owners for these animals. However, the exemption for these organisations to register must be regulated extremely carefully to ensure that loopholes are not exploited.
- 19) Currently, Northern Ireland lacks a formal legal definition or licensing framework for rescue and rehoming centres under the Welfare of Animals Act (Northern Ireland) 2011. As a result, these organisations are not subject to specific regulatory standards or inspection requirements. This regulatory gap creates a risk that individuals may falsely present themselves as charities or rehoming organisations, using the exemption to avoid oversight while rehoming animals for profit.
- 20) Although registration with the Charity Commission for Northern Ireland (CCNI) is required to be eligible for an exemption, concerns remain about the ease of registration, the risk-based inspection system, and the lack of enforcement. Individuals may present themselves as rescuers or welfare advocates, exploiting public trust.
- 21) There are also concerns that some animal welfare organisations listed on the CCNI register have failed to submit required documentation for extended periods, in some cases, over 200 days, yet continue to operate publicly without consequence. This undermines transparency and accountability.
- 22) We also urge caution regarding the proposed exemption for individuals who acquire a puppy or kitten and later “change their mind.” This exemption could create a loophole that undermines the intent of a third-party sales ban. Given the lack of robust traceability and controls over rescue and rehoming charities in Northern Ireland (as outlined above), we would question any proposal to exempt individuals from the requirement to register in connection with such transactions.
- 23) Any exemption from registration also undermines traceability of animals therefore, if an individual “changes their mind” within the first 6 months of an animal’s life, it should be the owner’s responsibility to inform the Council that they have relinquished the pet and to whom. The registration system should be flexible enough to make provision for this scenario and should also align with any changes to an owner’s dog ownership licence and any such related system. This should enable a Council to ascertain if indeed the new owner is aware of the transfer (to minimise fraud) and has purchased an owner’s licence.
- 24) However, this must be balanced against the recognition that any increase in complexity for people transferring ownership of pets may unintentionally lead to welfare issues such as increased abandonment. This is particularly concerning in the case of kittens, as they are not legally required to be microchipped, making them effectively untraceable if abandoned.

Without traceability, enforcement becomes extremely difficult, and the ability to monitor and safeguard animal welfare is significantly compromised.

- 25) To address this, we support the provision that the original breeder or supplier should be approached to ascertain if they can accept the animal back if an existing owner wishes to relinquish an animal within the first six months of life. Additionally, if the breeder or supplier is unable or unwilling to take the animal back, the existing owner should be encouraged to explore further responsible options, such as rehoming through friends or family. This would help to reduce pressure on rehoming charities. However, the overarching goal must be to ensure traceability and prevent abandonment.
- 26) If this exemption is retained, it must be tightly controlled. For example, a record should be kept of individuals who return animals to identify those who do so repeatedly over extended periods to help identify potential misuse and ensure traceability and accountability are maintained. This would help safeguard animal welfare while allowing for compassionate flexibility in genuine cases.

Question 4: Do you agree that the first year of registration should be free of charge, except for businesses?

Yes.

- 27) BVA, BSAVA and NIVA support the proposal to make the first year of breeder registration free, provided the registrant registers no more than one litter of puppies and no more than two of kittens, as this would lower the barrier to entry and encourage a greater number of breeders to register voluntarily. Increased participation is essential to the success of the system, as it enhances traceability. The register should be sufficiently comprehensive that it allows authorities to identify individuals who have previously been registered, even if they leave the system. This insight is a useful tool in supporting enforcement. The registration should be associated with both the premises and the individual to avoid abuse of the system.
- 28) In addition to waiving the initial fee, it is vital that the registration process itself is designed to be simple, accessible, and user-friendly. If the process is perceived as overly complex or bureaucratic, there is a real risk that individuals, particularly those with a single or unplanned litter, may avoid engaging with the system altogether. In effect, registration (where licensing is not required) should not be considered as 'an application' but should be seen as merely informing the Council of some key facts and an acknowledgement from the Council to the owner could be auto-generated by the system. To overly complicate the process could lead to increased instances of unregistered breeding or even the abandonment or dumping of puppies or kittens, undermining the very welfare goals the system seeks to achieve. A streamlined process, supported by clear guidance and effective communication, will be key to encouraging compliance and protecting animal welfare.

Question 5: Do you agree that a person who sells, gives away, or otherwise transfers the ownership of puppies and kittens, should be required to do so at the address where the puppies and kittens, and the biological mother are kept?

Yes.

- 29) Requiring the transfer of ownership to take place at the premises where the puppies or kittens and their biological mother are kept is a useful measure for enhancing transparency and accountability in animal sales. This approach should enable prospective owners to observe the environment in which the animals were bred and raised, supporting informed decision-

making and promoting higher welfare standards. Additionally, it provides a clear and consistent point of reference for inspection and enforcement, thereby simplifying regulatory oversight and helping to deter irresponsible or illegal breeding practices. However, it is not foolproof as unscrupulous breeders may move a breeding bitch or queen between premises and/or between so-called 'breeders' who operate within their network. Therefore, it is essential that the registration and licensing process ensures that information about the individual, the premises, the microchip number of the breeding bitch/queen and, where applicable, the stud dog/cat, are all associated on one online form, and that the details are included on one system that is shared by all Councils.

- 30) It should also be incumbent on the new owner to apply due diligence and research the supplier or breeder to ensure, as far as possible, that they are not unscrupulous. This would need to be supported by a government campaign similar to that in England.

Question 6: Do you agree with the conditions of registration, as listed above?

Yes.

- 31) We support the conditions of registration, subject to the points made in response to relevant points above being taken into consideration.
- 32) Regarding the requirement that it be indicated if an animal is 'undergoing any medical treatment', details should be provided on the exact nature of the treatment. For example, it should not be a barrier to sale if a puppy or kitten is on a short-term course of antibiotics. However, it is worth highlighting the potential complexities of this requirement. Specifically, there is a risk that it may inadvertently discourage some registered breeders from seeking veterinary care in order to avoid having to disclose treatment. This could undermine animal welfare and the intent of the regulation.
- 33) In addition to the exemption for the death of the mother, a puppy or kitten should be exempt from being shown together with its biological mother if there is a health risk to the puppy or its littermates or the mother from remaining with her. To prevent abuse of this exemption, a vet certification should be required stating that it is in the best interests of the animals to be removed earlier.
- 34) Additionally, the proposal should include that the full medical history of the bitch should be available to the purchaser on request.

Question 7: Do you agree that any advertisement for the sale of, giving away of, or other transfer of ownership of a puppy or kitten must include the information as listed above?

Yes.

- 35) We strongly support the inclusion of clear, consistent, and enforceable requirements for advertising the transfer of ownership of puppies and kittens, as outlined in the proposals. These measures closely align with the standards set by the Pet Advertising Advisory Group (PAAG), which have been adopted into legislation in England, Scotland and Wales, and go further in several positive ways.
- 36) In particular, we support the mandatory inclusion of the seller's registration number and associated council details, a recognisable photograph and the age of the animal, and the specification of the country of birth.
- 37) We also strongly support the addition of a clear warning about the life-changing responsibility

of acquiring a pet, which encourages more thoughtful and informed decision-making by prospective owners. We recommend this warning be accompanied by the [Puppy Contract](#) and for cats, the [Kitten Checklist](#). These have been designed to help buyers receive all of the information they need and empower them to make responsible decisions in the purchase of a puppy or kitten.

Question 8: Do you agree that an online, public Register of Sellers and Suppliers of Puppies and Kittens should publish the detail, as listed above?

Yes.

- 38)** We agree in part that an online, public Register of Sellers and Suppliers of Puppies and Kittens should publish the details as listed, except that the address should be omitted to protect breeders from the potential for theft of their puppies or kittens. Given some puppies and kittens come with significant financial value, this could attract unwanted attention. The registration number, if in line with criteria as outlined above and as per the consultation document, should be adequate.
- 39)** It would also be expected that the details made public are compliant with GDPR. A publicly accessible register would enhance transparency, empower prospective pet owners to make informed decisions, and support enforcement efforts by providing a clear record of legitimate sellers.