

Consultation on Proposed Animal Welfare Policy Reforms in Northern Ireland

Written Response

About you

Q1. What is your name?

LUCA PAVONI

Q2. What is your email address?

lucap@bva.co.uk

Q3. Are the views and opinions in your response personal or expressed on behalf of an organisation?

☐ Personal

☒ Organisation

If the views and opinions expressed are on behalf of an organisation, please provide the name of the organisation below.

British Veterinary Association (BVA) Northern Ireland Branch
British Small Animal Veterinary Association (BSAVA)



Q4. Please indicate if you are happy for your response to be published.

☒ Yes

☐ No

Q5. If you are responding on behalf of an organisation, please indicate if you are content for the name of the organisation to be associated with your response.

☒ Yes

☐ No

☐ Not Applicable

POLICY PROPOSALS

The consultation seeks views on proposed changes across four key policy areas:

- the regulation of rescue and rehoming organisations;
- an inflationary increase in dog licence fees;
- a ban on specific aversive training devices; and
- strengthened microchipping requirements for dogs.

In addition, the consultation includes a call for evidence on the mandatory microchipping of pet cats.

Full details of the proposals and the relevant consultation questions are set out in the consultation document.

Respondents may choose to comment on any or all of the policy areas outlined above.

REGULATION OF RESCUE AND REHOMING ORGANISATIONS

Q6. Do you agree that all rescue and rehoming organisations that rehome more than five animals annually should be inspected and licensed?

☒ Yes

☐ No

Comments

We support the proposal to introduce minimum welfare standards for all animals in the care of rescue and rehoming organisations across Northern Ireland, regardless of species. The lack of regulation currently risks undermining the valuable work carried out by the rescue and rehoming sector by a minority of poorly equipped or poorly governed organisations that do not consistently uphold expected standards of animal health and welfare. A clear and consistent regulatory framework would help to support responsible organisations by increasing transparency, strengthening public confidence, and ensuring a level playing field across the sector.

We are particularly concerned that some rehoming establishments who rehome animals for a fixed fee (dogs, cats and non-traditional companion animal species such as reptiles) may be operating with a commercial lens and therefore circumventing licensing and inspection legislation set out under the Welfare of Animals (Dog Breeding Establishments and Miscellaneous Amendments) Regulations (Northern Ireland) 2013.

We note the positive policy direction in Northern Ireland, including proposed EU-level reforms on the welfare and traceability of dogs and cats which are likely to be relevant in due course, and DAERA's ongoing consideration of recommendations arising from its Review of the Dog Breeding Regulations in Northern Ireland. Taken together, these developments reflect a clear and positive commitment to strengthening welfare standards and improving oversight across the companion animal sector. They will also bring indirect benefits to the rescue and rehoming sector (for example, better traceability and strengthened dog breeding legislation may reduce the volume of cats and dogs in rescue shelters). However, it remains important that rescue and rehoming organisations are directly addressed within this evolving regulatory framework, as was laid out in the Animal Welfare Pathway.

We are also mindful of animal and public health considerations associated with an unregulated rehoming sector, including zoonotic disease risks associated with certain species (for example psittacosis in birds and salmonella in reptiles), risks from dog bites, and the potential for the introduction of non-endemic diseases associated with the importation of rescue animals from abroad. For example, imported rescue dogs may present risks associated with diseases not commonly found within Northern Ireland, such as *Brucella canis*. Multi-species rescue centres may also present additional biosecurity challenges, particularly where species that would not normally be housed in close proximity are kept together, increasing the potential for cross species transmission of infectious diseases.

We are pleased that the proposed licensing conditions include measures relevant to animal and public health, including record keeping, veterinary involvement, and provision of isolation facilities for sick or potentially infectious animals. However, we consider that, given the risks associated with imported animals of unknown origin and medical history, further consideration should be given to additional safeguards, including potential requirements for disease testing in imported rescue animals, as well as behavioural assessments as per ADCH guidelines. For wild animals, thought should also be given as to whether it is appropriate to release them – particularly if they are non-native species. Where release is not appropriate, long-term captivity may not be an acceptable welfare outcome.

Q7. Do you agree that all rescue and rehoming organisations that care for eight or more animals (or five or more dogs) should be inspected and licensed?

☒ Yes

☐ No

Comments

We consider the proposed licensing thresholds as broadly fair and proportionate. However, further consideration should be given to whether additional risk factors may justify enhanced oversight or lower thresholds in certain circumstances. This could include organisations caring for species with more complex welfare or zoonotic disease considerations, as well as organisations dealing with imported rescue animals – especially if they have no known origin or medical history.

We also recommend that organisations falling below the proposed licensing threshold of more than five animals annually should still, at a minimum, be required to register with the Department. This would improve transparency, allow the location and activities of smaller organisations to be identified, and help prevent the creation of multiple nominally separate organisations operating from the same premises to avoid licensing requirements. Registration would also assist in monitoring organisations that may become overwhelmed by increases in intake over time.

Q8. Do you agree with the proposed licence conditions, as listed in the consultation document?

☒ Yes

☐ No

Comments

We support the proposed licence conditions and welcome the introduction of baseline welfare, record keeping, veterinary oversight and infection control requirements for rescue and rehoming organisations, and note positively that the proposed conditions are based on the standards set by the Association of Dogs and Cats Homes (ADCH), as well as the approach already taken in Scotland.

In particular, we support requirements relating to:

- Appropriate staffing and training
- Veterinary involvement
- Maintenance of suitable species-appropriate environments
- Provision of behavioural enrichment
- Record keeping and traceability
- Appropriate information and guidance provided to prospective keepers.

Taken together, the proposed licence conditions reflect modern approaches to animal welfare that recognise the importance not only of preventing pain and suffering, but also of ensuring positive welfare outcomes, a 'good life' and at least a 'life worth living' in line with the Five Domains model for animal welfare assessment.

The effectiveness of any future licensing regime will naturally depend on clear implementation guidance and proportionate enforcement. We also recognise that many rescue and rehoming organisations are small charities or volunteer-led bodies carrying out invaluable work to support animal welfare across Northern Ireland. It is important therefore for the success of the licensing regime that it avoids unnecessarily punitive or overly bureaucratic processes for responsible operators, while also recognising that minimum welfare standards cannot be compromised in the name of rescue.

Consideration should be given to the appointment, training and independence of inspectors. Inspectors should possess the necessary knowledge and competence to recognise and assess animal-based measures of health and welfare across the species covered by the licensing regime and exercise their duties consistently and effectively. Appropriate safeguards should be in place to avoid actual or perceived conflicts of interest (for example, where an individual relies upon particular rescue and rehoming organisations to support local animal welfare or stray animal services).

Impact Assessments

Q9. Do you have any comments to make in relation to the Regulatory Impact Assessment for the Regulation of Rescue and Rehoming Organisations, and its conclusions, or any additional information regarding impacts/costs?

☒ Yes

☐ No

Comments

This Regulatory Impact Assessment (RIA) appears to be based upon the assumption that inspections can be completed within approximately three hours. We caution that this timeframe is insufficient to allow for travel time, the physical inspection of the property, a full assessment of animal welfare standards, and a review of written records. For initial inspections and for inspections of organisations with multiple species, a target of three hours is particularly over-ambitious. The RIA also assumes that all organisations that will be subject to this are registered with the Charity Commission, while there may well be more.

The RIA's cost assumptions are based on a rescue staff member being on minimum wage. While this may be the case, senior staff members on a higher salary will have overall responsibility for ensuring compliance. We also note that the assumed cost of inspections is based on the current charging for dog breeding establishment inspections, which has not increased since their implementation in 2013. Consideration should therefore be given to whether the assumptions in this Regulatory Impact Assessment reflect the true time and financial costs associated with delivering robust inspections.

Q10. Do you have any comments to make in relation to the Rural Needs Impact Assessment or the Equality and Disability Screening for the Regulation of Rescue and Rehoming Organisations, and their conclusions?

☐ Yes

☒ No

Comments



DOG LICENCE FEES

Q11. Do you agree with the proposed inflationary increase across all categories of dog licence fees as set out in the consultation document?

☒ Yes

☐ No

Comments

As a principle, we have reservations about dog licensing with one of the main reasons being no commitment to ring-fencing revenue – we would want to see a clear indication of how the generated revenue would be spent, particularly given the proposals to increase the fee.

It is important that any move towards dog licensing does not become a tax on responsible dog owners. It is therefore essential that any revenue is ring-fenced and is used not only for enforcement against irresponsible owners but to provide enhanced services for the responsible dog owners that are paying for it.

In the context of Northern Ireland, we agree that the proposed inflationary increase across all categories of dog licence fees seem reasonable and proportionate. The licence fees have not increased since 2011, so this measure would support local authorities to continue delivering the proper functioning of the regime in today's financial climate.

We note that the proposed annual fees of £18.50 for a single dog licence and £47.50 for a block licence remain modest when considered alongside the costs associated with responsible dog ownership. We also welcome the retention of concessionary fees and exemptions for certain groups, including older people, assistance dogs and police dogs. This helps to ensure that the licensing regime does not create disproportionate financial barriers to responsible dog ownership.

Another way to keep the licensing scheme financially viable is by improving enforcement of licensing; many dogs in Northern Ireland are not licensed. The Department may wish to consider comparing the number of dogs microchipped with

the number of dogs licensed in Northern Ireland to determine the scale of this discrepancy. However, the fact that there is not a centralised microchipping database may make such figures difficult to obtain (see Q31). Penalties for non-compliance, which currently sit at just £50-80, should also be significantly increased to serve as a more effective deterrent.

As with all changes proposed in this consultation, it is important that the Department undertakes a public awareness campaign that clearly communicates new requirements, guidance and implementation timelines to key stakeholders and the wider public.



Impact Assessments

Q12. Do you have any comments to make in relation to the Regulatory Impact Assessment for the proposed increase in Dog Licence Fees, including its conclusions, or any additional information regarding impacts/costs?

☐ Yes

☒ No

Comments

Q13. Do you have any comments to make in relation to the Rural Needs Impact Assessment or the Equality and Disability Screening for the proposed increase in Dog Licence Fees, and their conclusions?

☐ Yes

☒ No

Comments

BAN ON SPECIFIC AVERSIVE TRAINING DEVICES

Q14. Do you agree that the use of handheld remote controlled electric shock collars (e-collars) on dogs and cats should be banned?

☒ Yes

☐ No

Comments

We have long campaigned for a complete ban on the sale and use of electric shock collars for dogs and cats across the UK, and so strongly support this proposal in Northern Ireland. We also note that the UK Government has committed to consult on whether to ban the use of electric shock collars in England during the course of this Parliament, and that the practice is already banned in Wales.

Those responsible for animals must ensure that the animals under their care are protected from unnecessary pain, suffering, injury and disease. Research has shown that the application of an electric shock to dogs or cats, even at a low level, can cause physiological and behavioural responses associated with stress, pain, and fear. We are concerned that the use of electric shock collars to punish or control dogs or cats would be open to abuse and could cause welfare and training problems.

In light of substantial evidence, we conclude that electric shock collars raise a number of welfare issues, such as the difficulty in accurately judging the level of electric pulse to apply to a dog or cat without causing unnecessary suffering.

We consistently support and recommend positive, reward-based training methods as the most effective training intervention for companion animals in terms of health, welfare and behavioural outcomes.

Please see: [BVA and BSAVA policy position on the use of aversive training devices in dogs and cats](#), which includes the appropriate references to the evidence mentioned above.

We note that the Department is not currently consulting on banning the use of electric containment fence systems, despite widespread concerns about their use – particularly those that are buried or hidden. There exists a paucity of evidence examining the effectiveness and welfare impacts of these devices, and we would strongly support the undertaking of further independent peer-reviewed research into the issue. This should include a comprehensive literature review of existing evidence, to robustly assess the effectiveness of electric containment systems and their impact on animal welfare.

Until further research is conducted however, we do not support the use of buried or hidden electric containment fences for dogs and cats that require animals to learn where the boundary is positioned through successive shocks in the absence of any physical or geographical demarcation. Pending further research outputs, the Department should only allow the sale and use of electric containment systems for dogs and cats which are either visible or audible to these companion animals.

Further, the sale of electric containment fences should only be permitted through approved vendors who must provide:

- Adequate instructions on the safe and responsible use of electric containment fences
- Clear information regarding the potential negative impacts on animal welfare if used incorrectly, referencing an owner's duty to ensure that the animals under their care are protected from unnecessary pain, suffering, injury and disease as set out in the UK Animal Welfare Acts.

Q15. Do you agree that the use of choke collars on dogs and cats should be banned?

☒ Yes

☐ No

Comments

We recognise that alternative aversive training methods, including choke collars and prong collars, also have the potential to result in negative welfare outcomes. As outlined above, we support and recommend positive, reward-based training methods as not only the most effective training method for dogs and cats, but also for ensuring animals are protected from any pain or suffering as part of their training.

Q16. Do you agree that the use of prong collars on dogs and cats should be banned?

☒ Yes

☐ No

Comments

See Q15

Impact Assessments

Q17. Do you have any comments to make in relation to the Regulatory Impact Assessment for the proposed Ban on Specific Aversive Training Devices, including its conclusions, or any additional information regarding impacts/costs?

☐ Yes

☒ No

Comments

Q18. Do you have any comments to make in relation to the Rural Needs Impact Assessment or the Equality and Disability Screening for the proposed Ban on Specific Aversive Training Devices, and their conclusions?

☐ Yes

☒ No

Comments



STRENGTHENING MICROCHIPPING REQUIREMENTS FOR DOGS

Q19. Do you agree that owners should be required to update any changes onto the relevant microchip databases within a specified time, such as 14 days?

☒ Yes

☐ No

Comments

We believe it is the dog keeper's responsibility to keep their contact details up to date on one of the authorised microchipping commercial databases. Similarly, where a dog or cat is transferred to a new keeper, the new keeper must, unless the previous keeper has already done so, record their details and any change in the pet's name with the database on which the pet's details are recorded.

Current legislation in Northern Ireland states that keepers should notify the operators of the database of any such changes "as soon as reasonably practicable". We support the proposal to strengthen this requirement by introducing a 14-day window, which we believe is a reasonable time period that will ensure information on databases is accurate and will strengthen the traceability of dogs in Northern Ireland.

Keeping database records up to date is fundamental to one of the principal purposes of compulsory microchipping, namely reuniting lost or stolen dogs with their owners. Evidence from the Dogs Trust Stray Dog Survey suggests that fewer stray dogs are being reunited with their owners because contact details held on microchip databases are not being kept up to date. In this context, the Department should also consider whether the current fixed penalty notice of £50 to £80 provides a sufficient incentive for compliance, or whether a higher penalty would better encourage owners to keep their records accurate.



Q20. Do you agree that the owner must indicate if they are / are not the breeder of the dog?

☒ Yes

☐ No

Comments

We agree that requiring the owner to indicate whether they are the breeder of the dog can serve as a valuable tool for improving breeder traceability and increasing transparency around breeding practices, thereby complementing relevant policy developments in Northern Ireland. This includes the proposed EU-level reforms on the welfare and traceability of dogs and cats which are likely to be relevant in due course, and DAERA's ongoing consideration of recommendations arising from its Review of the Dog Breeding Regulations in Northern Ireland.

Where the owner indicates that they are not the breeder, consideration should be given to requiring details of the breeder to be recorded where known. Provision should also be made for appropriate exemptions or alternative categories, for example where dogs have been acquired through rescue organisations or are stray animals with no identifiable breeder.

To further strengthen traceability, consideration should also be given to recording the microchip details of the puppy's parents, where known, as part of the permanent database record. This would improve the traceability of breeding lines and support efforts to promote responsible breeding and higher animal welfare standards.



Q21. Do you agree that all dogs should be microchipped before they are older than eight weeks?

☒ Yes

☐ No

Comments

We believe this is a reasonable proposal – Northern Ireland legislation already requires certain categories of puppies, including those kept under a block licence or within licensed breeding establishments, to be microchipped before eight weeks of age. The proposal would therefore introduce a more consistent and universal requirement across all dogs, regardless of the circumstances in which they are bred or kept.

It is worth noting that those who implant microchips should do so sufficiently regularly to maintain competence, particularly when microchipping very young or smaller breeds of dog. Implanting a microchip requires different skills from administering a routine subcutaneous injection. The Department may therefore wish to consider whether additional approved training, competency requirements or greater regulation of those permitted to implant microchips would help ensure high standards of animal welfare and reduce the risk of complications.



Impact Assessments

Q22. Do you have any comments to make in relation to the Regulatory Impact Assessment for Strengthening Microchipping Requirements for dogs, including its conclusions, or any additional information regarding impacts/costs?

☐ Yes

☒ No

Comments

Q23. Do you have any comments to make in relation to the Rural Needs Impact Assessment or the Equality and Disability Screening for Strengthening Microchipping Requirements for dogs, and their conclusions?

☐ Yes

☒ No

Comments



CALL FOR EVIDENCE ON MICROCHIPPING OF CATS

Q24. Do you keep, or own, one or more cats?

☐ Yes

☒ No

If Yes, please answer Q25 below.

Q25. Is your cat microchipped?

☐ I have one cat, it is microchipped.

☐ I have one cat; it is not microchipped.

☐ I have more than one cat, none are microchipped.

☐ I have more than one cat, some are microchipped.

☐ I have more than one cat, all are microchipped.



Q26. What benefits, if any, do you think the microchipping of pet cats could bring?

Please provide any evidence, data or examples to support your views.

Cat microchipping has the potential to improve animal welfare and promote responsible ownership:

- Lost, stray and stolen cats to be returned to their owners more rapidly;
- Quicker identification of injured cats meaning that owners are contacted more quickly for veterinary treatment to be agreed and undertaken promptly;
- Quicker and more accurate identification of dead cats and notification to owners;
- Health test results to be correctly attributed to an individual animal;
- Population data regarding cats be collected allowing more accurate prevalence data to be calculated;
- Tracing and identification of animals in the event of a disease outbreak, such as Rabies;
- Reinforcement of responsibilities of the owner under the Animal Welfare Act;
- Microchip activated technology, such as pet feeders or cat flaps, to support weight management and prevent unwanted animals the home;
- Easier detection of cat theft;
- Easier identification and subsequent arrest of owners culpable of animal cruelty as set out in the Welfare of Animals Act (Northern Ireland) 2011; and
- Reduction of potential for fraud at cat shows.



Q27. What challenges, if any, do you think the microchipping of pet cats could bring?

Please provide any evidence, data or examples to support your views.

While microchipping is generally considered a safe and effective means of permanent identification, there are some practical and welfare related considerations associated with implantation in cats, particularly in younger and smaller kittens. These can occur relatively soon after implantation and are commonly linked to the implantation procedure eg haematomas (bleeding under the skin) or infection (an abscess near the site or an infection spreading systemically, making the animal ill).

On rare occasions, an animal may react to an implanted microchip, as with any foreign material introduced into the body, with an inflammatory response. These along with any evidence of infection or other pathology should be reported as adverse events. There are a very small number of reports of paralysis resulting from implantation into the spinal cord. Although these relate to problems with implantation technique rather than a problem with the microchip, these should also be reported.

We would welcome further clarity as to whether if compulsory microchipping were to be introduced, there would be small chip sizes available for smaller kittens. We are aware that even with mini chips, the size of the needle for implantation can still damage soft tissue of smaller kittens. We would therefore welcome further clarity as to what the proposed age for microchipping kittens would be in any legislation. We note that the Microchipping of Cats and Dogs (England) Regulations 2023 require cats to be microchipped by 20 weeks of age, and consideration could be given to adopting a similar approach in Northern Ireland.

Alongside potential health concerns, consideration also needs to be given to the enforcement of this proposal. Local authorities currently enforce the microchipping of dogs, and we would welcome further clarity as to who would enforce compulsory microchipping for cats, how this would be funded, and which personnel would carry out these enforcement duties. Consideration should also be given to ensuring that penalties for non compliance are sufficient to encourage compliance from the outset.

Finally, it is important to recognise the difficulties of implementing compulsory microchipping legislation for feral, or wild living, domestic cats who have no

identifiable owner and/or cannot be handled safely enough to be microchipped. Some feral cats are ear tipped to indicate that they have been neutered. However, if they were also required to be microchipped, practical challenges would remain, including who should be recorded as the registered keeper where no identifiable owner exists. We therefore question the potential effectiveness of a compulsory microchipping strategy for all cats.

Q28. What do you think might present a barrier for cat owners to microchip their pet cats?

Please provide any evidence, data or examples to support your views.

The cost of microchipping may be considered a disincentive for some cat owners, although the cost is relatively small, with microchipping prices range approximately between £10 to £30. The cost includes the price of the microchip, implantation and registration on a relevant database. Further costs may be incurred if there is a need to amend the owner's details for which there is a small fee charged by the database. On some databases, owners can pay a fee for unlimited amendments to the database record for the lifetime of the animal.

The cost of microchipping implantation and registration is an extremely small share of the total cost of cat ownership, which ranges between £12,000 and £24,000 over its lifetime according to PDSA estimates. However, any additional cost could be perceived as a deterrent for potential new owners from low-income brackets who would otherwise explore offering a good home to a cat or kitten. Pet ownership brings many benefits to society and consideration needs to be given to supporting all sectors of society whether by government or in partnership with charities. There are many support schemes which could provide a template for implementation. Cat breeders and sellers may also have to meet the cost of microchipping before the point of sale or transfer. However, if the limit is set at 20 weeks, most kittens would be sold by then and the cost would pass to the owner.

Specific consideration would also need to be given to a lead in period for existing pet owners who do not have their cat microchipped at the point of introducing any new legislation requiring compulsory microchipping. The Department should also think about how to encourage compliance at a faster rate than that possible through natural population turnover, so that the benefits of the policy (which are only fully realised when the vast majority of the population is identified) may be gained at the earliest possible date.

Q29. Are there any other challenges that should be considered, in relation to mandatory microchipping of pet cats?

Please provide any evidence, data or examples to support your views.

For veterinary practice, cross-checking with such a large number of databases is an administrative burden which challenges already stretched vets and vet nurses, whose limited contact time with their clients and patients is better spent providing preventative healthcare advice. Please see Q31.

In addition, the success of any compulsory cat microchipping scheme will depend on ensuring that cat owners understand how the system operates in practice. In particular, while the implanter may register the microchip details with a database in the first instance, responsibility for keeping contact details up to date rests with the keeper thereafter. A clear public awareness campaign should therefore accompany any legislative changes to promote compliance and maximise the effectiveness of the scheme.

Q30. Are there any other challenges, including for any other type of cats, which should be considered?

Please provide any evidence, data or examples to support your views.

N/A

Q31. Is there anything else you would like DAERA to consider on this issue?

Please provide any evidence, data or examples to support your views.

The introduction of compulsory microchipping for cats offers an opportunity to address, and learn from, the issues that are currently preventing the effective implementation of compulsory dog microchipping regulations across the UK – in particular – the number of separate national databases currently in existence.

For veterinary practice, cross-checking with such a large number of databases is an administrative burden which challenges already stretched vets and vet nurses, whose limited contact time with their clients and patients is better spent providing preventative healthcare advice. Ideally, there would be one central UK microchip database that is maintained and kept up to date, which would significantly improve the effectiveness and efficiency of the system.

However, we recognise that this may be a challenge given the proliferation of commercial databases in recent years, and so the implementation of one central UK microchip database is unlikely. Instead, we are calling for:

- All existing and future commercial microchip databases to register with [EuroPetNet](#). Petlog is currently the only UK database to be registered.
- Improved enforcement in relation to those databases which do not meet government standards.
- Exploration of the potential for setting up a single point of entry to query existing multiple real-time databases. The ability to enter a microchip number into a single web-based portal that could check all microchip databases would minimise the need for a manual search, increasing efficiency and protecting commercial interests.
- Integration of Veterinary Practice Management Systems to single point of query to facilitate lookup of microchip numbers
- Encourage the development of notification service using the same connection as the Microchip registration PMS - Database, to notify the databases when client details are update on the PMS, subject to client consent and data protection.

We encourage the Department to follow the measures Defra has committed to take to strengthen microchipping databases as part of the [Animal Welfare Strategy](#) for England, including:

- Developing a more robust process of due diligence before recognising pet microchipping databases as compliant
- Improving our regulatory oversight of pet microchipping databases to ensure that all databases meet expected standards

Written responses should be sent to:

E-mail: animalwelfarepolicy@daera-ni.gov.uk

Postal address: Animal Welfare and Dog Control Policy Branch

Department of Agriculture, Environment and Rural Affairs (DAERA)

Jubilee House

111 Ballykelly Road

Ballykelly

Limavady

BT49 9HP

Closing Date for Responses is Tuesday 30 June 2026.

