

USPCA (Ulster Society for Prevention of Cruelty to Animals)



**Date: 24 February 2026**

**Deadline for consultation responses: Sunday 1 March**

**USPCA response to COM/2023/769 Proposal for Regulation on the welfare of dogs and cats and their traceability**

**Weblink: [COM/2023/769 Proposal for Regulation on the welfare of dogs and cats and their traceability - Northern Ireland Assembly - Citizen Space](#)**

**Email: [windsorframework.committee@niassembly.gov.uk](mailto:windsorframework.committee@niassembly.gov.uk)**

### **Who is the USPCA?**

The USPCA is the second oldest animal welfare charity in the world. Established in 1836, we have been advocating for animal welfare for nearly 200 years.

The animals around us play an essential role in our society and natural environment. They enhance our quality of life; however, they can often be taken for granted or, worse still, abused.

The USPCA engages with policymakers and politicians to inform and influence the debate on a range of priority animal welfare issues. Our work is guided by a coherent ethical approach to how society should treat all animals.

Sadly, Northern Ireland lags behind the rest of the UK and Ireland in legislating to enhance animal welfare across various areas although we value the recent DAERA proposals to provide protection through the Animal Welfare Pathways plan <https://www.daera-ni.gov.uk/sites/default/files/2025-05/25.26.001%20DAERA%20Animal%20Welfare%20Pathway.pdf>.

There is still time to catch up by learning from other jurisdictions to produce legislation and update policies that will position us as leaders in animal welfare. The USPCA stands ready to play its part with others in preventing animal cruelty, relieving suffering and advancing animal welfare across Northern Ireland.

### **Our Response**

The USPCA welcomes the Commission's proposed new EU rules and their potential extension to Northern Ireland under the Windsor Framework. For the first time, these new EU rules will focus on the welfare and traceability of dogs and cats bred, kept, and traded as companion animals for economic purposes.

The new EU regulations on the welfare and traceability of dogs and cats aim to establish uniform standards across the EU for breeding, housing, and handling these animals in breeding establishments, pet shops, and shelters.

These measures are designed to improve animal welfare and ensure that Northern Ireland maintains high standards in line with the rest of the EU.

Key aspects of the proposal include:

- **Mandatory Identification and Registration:** All dogs and cats must be identified and registered in national databases to combat illegal trade.
- **Minimum Welfare Standards:** Uniform standards for housing, care, and handling will be applied across the EU and Northern Ireland.
- **Enhanced Traceability:** Stricter traceability requirements will help authorities control the breeding and trade of these animals
- **Responsible Ownership:** Prospective pet owners will be informed about responsible ownership

These measures are part of a broader effort to improve animal welfare and tackle issues related to the illegal trade of pets. Overall, we view the new regulations as a significant step against illegal puppy trading. It is also important to highlight that the five domains concept will be fully embraced by the new regulation, reinforcing the message that emotional needs are equally important as the physical needs of animals.

Non-EU countries exporting dogs and cats into Europe must also register animals accordingly and fulfil the basic welfare requirement, which is a positive step forward to advance animal welfare.

While we broadly believe the proposal sets good standards for the objectives it seeks to achieve, there are specific points we would like to highlight.

### **Identification and Registration**

The new proposal does not apply uniformly to all dogs and cats, only to those deemed traded for “economic purposes.” We recommend that this extend to all pet owners, given that animals may be sold some months or even years after their birth.

Clause 43 states that to ensure the traceability of dogs and cats, they should be “individually identified with a unique identifier in the form of a transponder... and registered in a database.” It also states that it is “necessary to ensure the interoperability of these databases.”

The pet registry should include all breeder details (include hobby breeders) to enable full traceability back to the breeder if required. Online platforms used for the trade of pets should be authenticated before they are posted live to ensure that the breeder is registered and traceable.

### **Breeding regulations**

Breeding regulations should extend registration obligations to all breeders to ensure full transparency and traceability linked to a single address, thereby ensuring that the animal welfare of hobby breeders is not compromised. We are aware of existing loopholes in domestic dog breeding legislation that allow multiple people in the same household to claim ownership of individual dogs, thus avoiding the three-litter threshold.

The proposal fails to address other important measures, the ban on the sale of cats and dogs in pet shops.

Additionally, the rise in canine fertility clinics has presented numerous animal welfare concerns, an industry which is currently unregulated. It is unfortunate that this issue has not been addressed in the new regulations.

Specific references concerning extreme breeding, such as “minimizing negative welfare consequences,” are needed. We agree with Eurogroup’s position on an ownership ban, as well as a ban on the use of extreme-featured breeds in media, exhibitions, and competitions, as these would provide much better restrictions.

We note the description of a pound (section 12) included in the regulations. Whilst a pound’s primary purpose is provision of emergency housing, all Council operated pounds in Northern Ireland have the option to place dogs which have not been reclaimed on sale to the public.

Whilst some local Council pounds choose not to sell unclaimed animals others do. As detailed in the Council Dog Summary statistics one Council area (Newry Mourne and Down) sold 158 impounded dogs in 2023-24. As noted, whilst the sale of animals is not considered the primary function or motivation of pounds, they are none-the-less placing animals for sale and consideration should be given to the welfare needs of these animals and the requirements of owners purchasing a dog in this manner.

We would welcome pounds, either local Council owned / operated or private, to be licenced and regulated in the same manner as other AWEs, to ensure the welfare needs of the animals in their care are met.

## **Training**

Clause 24 states that “Animal caretakers should have the competencies in animal welfare relevant to their tasks and the dogs or cats they handle...” The clause takes into account that shelters are dependent on voluntary work, so provides that volunteers “supervised by a competent animal caretaker should not be required to have formal education, training or professional experience.”

## **Timelines**

Regarding the implementation timescales, EU Member States will have three years to set up the databases and five years to ensure interoperability throughout Europe. Microchipping will then come into force three years after the regulation is introduced, and traceability information should be available to customers after five years.

We encourage the NI Executive to pursue the regulation changes through domestic legislation. Not to wait until the legislative timeframe set out within the new EU regulations, which could take over ten years to be fully implemented.

Northern Ireland falls behind the rest of the UK on several key pieces of animal welfare legislation including dog breeding, regulation of the animal welfare sector, and compulsory microchipping of cats. We cannot afford to wait up until ten years before these key changes are implemented. We have long been campaigning for the introduction of these measures through domestic legislation.

## Resources

We are also aware of the resource implications of the changes that will be required. We understand the significant pressures on the public purse and suggest that, as part of a review of domestic legislation, some of the funding could be generated through significant increases to the current dog breeding licensing fee and boarding kennel fees.

## Enforcement

We would welcome penalties aimed at combating the illegal trade of dogs and cats and ensuring compliance. However, we also recognise that it is crucial to establish a robust enforcement framework to guarantee regulations are effectively implemented.

To achieve this, we recommend the following measures:

- **Training and Resources:** Provide training for officers on the specifics of the new regulations, including identification, registration, and welfare standards. Adequate resources, including funding and personnel, should be allocated to ensure that these officers can perform their duties effectively.
- **Collaboration with the broader animal welfare sector:** Work in partnership with animal welfare charities to promote compliance and raise awareness about the regulations. Animal welfare charities can play a vital role in grassroots education and reporting. The USPCA's Special Investigation Unit examines organised animal cruelty crimes in Northern Ireland. The illegal puppy trade is one of our top priorities.
- **Clear Penalties and Consequences:** Ensure that penalties for non-compliance are clearly defined and proportionate to the severity of the violation. This should include fines, revocation of licenses, and, in severe cases, criminal charges.
- **Feedback and Improvement:** Establish a system for feedback on the enforcement process, allowing stakeholders to suggest improvements and highlight challenges. This iterative approach can help refine enforcement strategies over time

For any queries about this response please contact USPCA CEO Heather Weir

