



Dogs Trust response to the Windsor Framework Democratic Scrutiny Committee call for views on Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the welfare of dogs and cats and their traceability.

Do you consent to your submission being published on the Committee's website and included in the Committee's report?

- Yes. Publish in full.
- Yes. Publish but with my personal information and any content that could be used to identify me redacted.**

Introduction

What is your name?

██████████

What is your email address?

publicaffairs@dogstrust.org.uk

What is your organisation?

Dogs Trust

Dogs Trust is the UK's largest dog welfare charity. We have twenty-one Rehoming Centres across the UK, and one in Dublin. In 2025, we cared for 11,374 dogs and found homes for 10,023 dogs. We have one Rehoming Centre in Northern Ireland, operating since 1970 and based in Ballymena.

Dogs Trust advocates at local, devolved, and reserved levels of government on behalf of dogs and their owners, operating across all regions of the UK. We invest substantial resources in public facing information services, education programmes, and behaviour interventions.

Dogs Trust Chair the Pet Advertising Advisory Group (PAAG) was created in 2001 to combat growing concerns regarding the irresponsible advertising of pets for sale, rehoming, and exchange. The Group comprises a combination of animal welfare organisations, trade associations, and veterinary bodies. DAERA, Defra, Welsh Government, and the Scottish Government have endorsed the PAAG guidelines.

Impact of EU Act

The Committee is seeking your views on the following three questions.

1. Does it appear likely that the proposed EU act would have a significant negative impact specific to everyday life of communities in Northern Ireland in a way that is liable to persist?

Yes

No

Unsure

Tell us why (Required)

We believe that the proposed EU act would **not** have a significant negative impact specific to everyday life of communities in Northern Ireland in a way that is liable to persist.

The introduction of regulations which seek to deliver these measures and set defined baseline standards for animal welfare across the EU regions is welcome.

Dogs Trust broadly supports the overall objectives of the regulatory proposals; these being:

- To regulate the trade in dogs (and cats) in the EU internal market, including imports from third countries
- To avoid barriers to trade and combat illegal trade, whilst ensuring a high level of protection of animal welfare.

Furthermore, we broadly support the specific objectives of the regulatory proposals; these being:

- Ensuring common animal welfare standards for the breeding, keeping, and placing on the market or supplying of dogs (and cats).
- Improving the traceability of dogs (and cats) placed or supplied to the EU market.
- Promoting competence for animal caretakers.
- Enhancing consumer protection.
- Supplementing existing rules for the imports of dogs (and cats).

However, there are some articles within the regulations which we believe are insufficient in protecting the welfare of our dogs (and cats), that merit further consideration or revision, or would be difficult to effectively implement. We have concerns about the enforcement of certain articles were they to be approved, and the implementation timelines allocated to several of them.

Furthermore, where the Department of Agriculture, Environment and Rural Affairs has stated that domestic legislation is in place concerning articles, it is our view that some

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of the domestic legislation itself is not sufficient in protecting the welfare of our dogs (and cats), nor will this EU legislation effectively address it. In these instances, we would welcome new or additional domestic legislation as the primary mechanism for the introduction of these safeguards for our dogs (and cats).

Comments on each article are provided under our response question 3.

2. Does it appear likely that NOT APPLYING the proposed EU act would have a significant negative impact specific to everyday life of communities in Northern Ireland in a way that is liable to persist?

- Yes
- No**
- Unsure

Tell us why (Required)

Whilst the introduction of these regulations is broadly welcomed, there is currently domestic legislation in place to address the issues the Act is seeking to remedy.

As such, we believe it is **unlikely** that not applying the proposed EU act would have a significant negative impact specific to everyday life of communities in Northern Ireland in a way that is liable to persist.

However, it is our view that some the of domestic legislation itself is not sufficient in protecting the welfare of dogs (and cats), nor will this EU legislation address it. In these instances, we would welcome new or updated domestic legislation as the primary mechanism for the introduction of these safeguards for our dogs (and cats).

Comments on each article are provided within our response to question 3.

3. Are there any other matters regarding the proposed EU act that you wish to draw to the Committee's attention? Please note, any information provided should be of an evidential nature rather than a commentary.

(Required)

- Yes**
- No
- Unsure

Tell us why (Required)

Proposal for a Regulation of the European Parliament and of the Council on the welfare of dogs and cats and their traceability (COM/2023/769)

Chapter II - OBLIGATIONS FOR OPERATORS OF ESTABLISHMENTS

Article 4 Exemptions from the obligations set out in this Chapter (II)

Regarding the exemptions set out in Article 4, Dogs Trust would recommend that:

- Anyone breeding, selling, or transferring the ownership of a puppy (a dog up to 6 months old), regardless of any financial transaction or gain, be required to be registered, and included in the obligations.
- Anyone breeding, selling, or transferring ownership, regardless of any financial transaction or gain, of more than **one** litter of puppies in a year, require a licence, and included in the obligations.
- The exemptions apply to shelters keeping at any given time **five** dogs or less only.

Article 5 *General welfare principles*

Dogs Trust welcomes the general welfare principles set out for operators and natural or legal persons responsible for shelters with respect to dogs (and cats) bred or kept in their establishment. Including provision of appropriate hydration and nutrition, a good physical environment, a safe and clean environment, expression of social, non-harmful behaviour, optimisation of their mental state and provision of positive, species-appropriate stimuli.

To note, these principles are enshrined within the current Welfare of Animals Act (Northern Ireland) 2011 and The Welfare of Animals (Dog Breeding Establishments and Miscellaneous Amendments) Regulations (Northern Ireland) 2013. These include the five welfare needs as outlined; the need for a suitable environment; the need for a suitable diet; the need to be able to exhibit normal behaviour patterns; any need it has to be housed with, or apart from, other animals; and the need to be protected from pain, suffering, injury and disease.

Should the domestic legislation be updated, we would very much welcome a progressive approach of using the five domains model rather than the five welfare needs to better ensure the overall welfare of animals.

Article 6 *General welfare obligations*

Caretakers

We welcome that shelters must ensure that dogs (and cats) are handled by an adequate number of animal handlers who possess the skills and competences required under Article 9.

We believe that all those who work at a welfare organisation should be sufficiently trained in dog body language, recognising stress in dogs and be aware of when to seek expert advice. An appropriate animal care qualification should be a necessity covering animal welfare, handling, behaviour, cleanliness, feeding, and disease control.

In relation to training methods Dogs Trust advocates solely for the use of positive reinforcement and training techniques. These have been proven to be safer, more effective and are more humane in relation to overall animal welfare.

Specific staff to dog ratios do not reflect that individual animals being cared for can require different levels of care depending on their state of health. In calculating the staff required at any given time, consideration must be foremost given to ensuring that there is enough capacity between all people to be able to provide the five welfare needs for every individual animal onsite, and any associated required activities such as cleaning and providing emergency and preventative healthcare within prescribed timescales.

Breeding strategies

Dogs Trust agrees with the provision that breeding strategies should not result in genotypes and phenotypes that have detrimental effects on the welfare of the dogs (or cats), or of their descendants, including mating between parents and offspring, or between grandparents and grandchildren.

Article 7 Notification and registration of establishments

We welcome that operators and individuals or legal entities responsible for shelters must notify the competent authorities of their activity (local Councils in Northern Ireland).

Under the Welfare of Animals (Dog Breeding Establishments and Miscellaneous Amendments) Regulations (Northern Ireland) 2013 dog breeders in Northern Ireland are currently required to be registered. This includes providing:

- *The operator's identity, name, and address;*
- *The location of the establishment.*

However, they are not required to provide information on the breed of dogs or the estimated number of litters to be placed on the market that year, as such we welcome that provision.

- *The species and breed, if applicable, of the animals kept at the establishment.*

With respect to the requirement of the maximum number of animals that can be kept at the facility, Northern Ireland does not have a set maximum number of dogs (be that bitches, stud dogs, or puppies) which can be bred and / or kept at a breeding establishment.

For example, the largest breeding establishment in Northern Ireland is currently licensed for up to 350 breeding bitches. Breeding on this industrial scale calls into question the provision of minimum welfare standards and whether the dogs and pups are being kept in conditions which meet these five welfare needs.

The EU proposals would not sufficiently address the issue of industrial scale breeding in Northern Ireland. Dogs Trust believes that the Northern Ireland Executive should pursue improved breeding regulation through domestic legislation, including:

- *The maximum number of animals that can be kept at the facility.*

As outlined in the proposals, but in addition:

- *the animal's date of birth*
- *the animal's sex*
- *details of any veterinary treatment*
- *the puppy's microchip number (microchipping is a legal requirement for dogs in Northern Ireland)*
- *the date of the sale, giving away, or otherwise transfer of ownership of the puppy.*

In relation to microchipping, the importance of traceability, animal health, and biosecurity cannot be overstated. Recording microchip information links animals, and therefore disease outbreaks to their source of origin i.e. breeding establishments., With that information infectious diseases, zoonotic or otherwise, can be effectively managed. The risk to human and animal health increases exponentially without effective tracing mechanisms which allow all stakeholders to engage in appropriate, timely management of outbreaks.

With respect to shelters, there is currently no regulation relating directly to shelters. We want to see the introduction of legislation that regulates the following and subjects them to regular inspections against mandatory minimum standards:

- **rehoming organisations including those that rehome from overseas,**
- **rescues**
- **sanctuaries** and
- **pounds, both private and Council operated.**

Crucially, we believe that all establishments of these types should be regulated, whereas the EU proposals would only regulate larger establishments.

The EU proposals would not sufficiently address the issue of unregulated rescue and rehoming in Northern Ireland. Dogs Trust believes that the Northern Ireland Executive should pursue regulation of rescue and rehoming through domestic legislation.

Article 8 Obligation of informing on responsible ownership

Dogs Trust welcomes the regulation requiring those acquiring a dog or cat to be provided with information on their welfare needs and responsible pet ownership. However, we believe the legislation could go further than the prescribed warning, to ensure buyers are aware of what pet ownership involves and how to ensure they buy a pet responsibly.

We would like to see the full list of Pet Advertising Advisory Group (PAAG) Standards incorporated into legislation. These include ensuring that every view item page includes prominent links to the PAAG advice on buying and selling an animal, as well as links to PAAG approved care information on feeding, housing, handling, husbandry, life expectancy, provision of suitable accessories and veterinary care for the animal being

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advertised.

Member States will be best placed to direct buyers and sellers in those countries to the relevant information. Therefore, we recommend that this should be taken forward in Northern Ireland domestic legislation.

Dogs Trust would encourage DAERA and the advertising sector to work with the charitable sector in Northern Ireland, including Dogs Trust, to ensure that this information can be easily accessed and provided to owners.

Article 9 Animal welfare competences of animal caretakers

Dogs Trust welcomes the regulation regarding required competencies and training and the flexibility in acquiring these competencies and training, either through formal education, training, or professional experience.

In relation to training methods Dogs Trust advocates solely for the use of positive reinforcement and training techniques. These have been proven to be safer, more effective and are more humane in relation to overall animal welfare. Dogs Trust provides suitable training and supervision for these groups, but realises that, particularly for smaller, volunteer run charities, there will be a time and financial cost associated with this training, as such supervision by a competent animal caretaker is required.

However, it is important to reiterate that training is necessary to meet the five animal welfare needs. Under the EU proposals there would be no requirement for smaller establishments to have competent animal caretakers. Whilst many caretakers operate with good intentions, a lack of suitable education and / or training can inadvertently jeopardise the welfare of dogs.

Article 10 Advisory welfare visits

Dogs Trust welcomes the regulation requiring that animal shelters require a visit by a veterinarian within the first year of their operation and record the conclusions of the veterinarian's visit referred to in point (a) and their follow-up actions, and keep these records for at least four years, making them available to the competent authorities upon request.

The introduction of uniform criteria will allow a standardised approach to visitation and reporting. Regulation of 'shelters' is something Dogs Trust has long called for, and an advisory veterinary visit is a positive move towards ensuring improved animal welfare standards within these sectors.

However, the scope of the EU proposals would not include this requirement for all establishments of this type. Dogs Trust recommends that comprehensive domestic legislation is introduced to thoroughly regulate the organisations outlined in our response to Article 7.

Article 11 Feeding and watering

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Dogs Trust welcomes these provisions concerning cleanliness, quality, quantity and adequate supply of food and water etc. to ensure EU member states are meeting minimum welfare requirements.

These principles are currently enshrined within the current Welfare of Animals Act (Northern Ireland) 2011 and The Welfare of Animals (Dog Breeding Establishments and Miscellaneous Amendments) Regulations (Northern Ireland) 2013 under the five welfare needs. These include the need for a suitable environment, and the need for a suitable diet. Should the current domestic legislation be updated, we would very much welcome a progressive approach of using the five domains model rather than the five welfare needs to better ensure the overall welfare of animals.

Article 12 Housing

Dogs Trust welcomes the provisions concerning facilities, equipment allowing access and inspection, building construction, maintenance, cleaning and disinfection, air circulation, dust, temperature, humidity, and gas concentrations, ventilation, and heating.

Dogs Trust welcomes the requirements that dogs (and cats) should have ample space for movement, space for enrichment materials and structures, opportunities for socialization and retreat, and clean resting areas. We also welcome that 'outdoor' dogs (and cats) should be suitably protected, that dogs have daily access to an outdoor area, that kennels are suitably constructed, and that dogs (and cats) have access to natural light (or artificial where not possible) to ensure EU member states are meeting minimum welfare requirements.

Regarding the prescribed circumstances for container use, we would want these to be expanded to include a maximum amount of time for travel or isolation and minimum container sizing. This would help avoid animals being kept in confinement in conditions which restrict their natural movement.

These principles are currently enshrined within the current Welfare of Animals Act (Northern Ireland) 2011 and The Welfare of Animals (Dog Breeding Establishments and Miscellaneous Amendments) Regulations (Northern Ireland) 2013 under the five welfare needs. These include the need for a suitable environment, the need to be able to exhibit normal behaviour patterns; any need it has to be housed with, or apart from, other animals; and the need to be protected from pain, suffering, injury, and disease.

Article 13 Health

Dogs Trust welcomes these provisions concerning inspections, treatment, breeding, parasitic control, injury risk, and contamination to ensure EU member states are meeting minimum welfare requirements.

These principles are currently enshrined within the current Welfare of Animals Act (Northern Ireland) 2011 and The Welfare of Animals (Dog Breeding Establishments and

Miscellaneous Amendments) Regulations (Northern Ireland) 2013 under the five welfare needs. These are: the need for a suitable environment; the need for a suitable diet; the need to be able to exhibit normal behaviour patterns; any need it has to be housed with, or apart from, other animals; and the need to be protected from pain, suffering, injury, and disease.

Dogs Trust support the provision that euthanasia must be performed by a veterinarian, but with a derogation in emergencies. Euthanasia should always be conducted in a 'humane' and 'appropriate' manner to avoid causing unnecessary suffering. With regards to the stipulations set out in Annex 1, point three relating to Article 13 regulations (health), Dogs Trust does not feel these suitably address the welfare needs of dogs (and cats).

Should the Northern Ireland Assembly wish to pursue domestic regulation concerning these breeding practices listed we would recommend the following:

- That bitches shall only be bred as of their second oestrus.
- That there should be a maximum of one litter from each bitch within a 12-month period.
- That no dog may be kept for breeding if it can reasonably be expected, on the basis of its genotype, phenotype, or state of health, that breeding from it could have a detrimental effect on its health or welfare or the health or welfare of its offspring.
- That a dog should not breed if they have had two caesareans, or one caesarean where this has been due to the conformation of the bitch or puppies.
- That no bitch should be mated if they are over eight years of age, or after six litters.

We welcome the provision that:

- Adult female dogs (and cats) that are no longer used for breeding, in particular due to the provisions of this regulation, shall not be killed or abandoned. Operators must continue to ensure the welfare of these animals in accordance with the regulation.

Article 14 Behavioural needs

Dogs Trust accepts that there might be occasions (for example examination of injury or disease) when it is of benefit to the welfare and safety of an individual dog, for them to be restrained for short periods. This should always be under supervision; dogs should never be tied up and left unsupervised. We would advocate for restraint within a container, as opposed to the use of a chain.

However, we would welcome further information and scrutiny on the medical or welfare reasons noted in Article 14, whereby it may be necessary to restrict a dog (or cats) natural movement, including chaining.

Under the current The Welfare of Animals (Dog Breeding Establishments and Miscellaneous Amendments) Regulations (Northern Ireland) 2013 operators of breeding

establishments must ensure that there is an appropriate strategy for socializing. However, we are concerned over the lack of scrutiny for the actual implementation of this socialisation, (enhancement, and enrichment) programmes. We would urge DAERA to consider the recommendations of the currently commissioned DAERA Expert Breeding Review Group with respect to socialization requirements.

Article 15 Painful practices

Dogs Trust welcomes the prohibition of painful practices including ear cropping, tail docking, claw removal or other partial or complete digit amputation, and resection of vocal cords or folds.

Surgical mutilations, such as tail docking, ear cropping, devocalisation, and declawing, are illegal in all EU Member States for both dogs and cats. However, in a third of Member States, there are some exceptions, such as tail docking or declawing of certain dogs bred for hunting. Surgical mutilations are also illegal in the UK, including in Northern Ireland. It currently remains legal to sell or import dogs with cropped ears; a serious loophole in the legislation, which is being exploited by criminals to enable them to continue to sell mutilated dogs.

Whilst the Northern Ireland Assembly passed a Legislative Consent Motion on 1st July 2025 enabling the making of legislation for the purpose of promoting the welfare of dogs, cats, or ferrets, when bringing any of those animals into the United Kingdom, including banning the import of dogs with cropped ears or docked tails, secondary legislations has not yet been introduced. We would urge the expedient drafting of secondary legislation (Regulations / Statutory Rule) as outlined in the Act to ensure these new powers are enacted.

Dogs Trust welcomes the prohibition of:

- *tying body parts together unless for medical reasons,*
- *kicking, hitting, dragging, throwing, or squeezing dogs (or cats),*
- *Applying electric current to dogs (or cats),*
 - We would recommend this extends to all forms of current application including via an electronic collar both in person and remote operated, containment fencing or other means. Dogs Trust would question the use of electric current for medical reasons and would welcome further scrutiny on this.
- *Using of muzzles unless required for medical reasons, or animal or human safety reasons,*
 - We welcome the provision that a dog (or cat) shall be supervised and the muzzle used for the minimum period necessary.
- *Lifting dogs (or cats) by their limbs, head, tail, or hair or lifting adult dogs (or cats) by the skin*

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In relation to choke collars Dogs Trust would welcome complete prohibition of their use as it is an aversive training method which we do not support.

Dogs Trust welcome the provisions which seek to curtail unhealthy breeding trends, and promote the healthiest versions of dog breeds, including their use in aesthetic shows.

CHAPTER III

IDENTIFICATION AND REGISTRATION OF DOGS AND CATS

Article 17 *Identification and registration of dogs and cats and Article 19* *Databases of dogs and cats and Article 20* *Collection of data on animal welfare and reporting*

Article 17 Dogs Trust believes that only a system of dog breeding and selling that has total traceability of all dogs involved can be fully effective in promoting animal welfare, protecting the consumer, and preventing inherited disease and conditions.

Dogs Trust welcomes the regulation on the microchipping of dog and cats placed on to the EU market.

The Dogs (Licensing and Identification) Regulations (Northern Ireland) 2012 requires that all dogs be licensed and that a microchip number is included on the paperwork to secure a license. Therefore, it follows that it is a requirement that all owned dogs in Northern Ireland be microchipped. Dogs should be microchipped by eight weeks of age, unless advised otherwise by a veterinarian.

The traceability of a litter, and of breeders, is of utmost importance. Whilst not covered by the regulations, significant traceability would be gained if there was a requirement for microchip databases to include a mandatory field at first registration to ask if the person registering their details was the person that bred the puppy. If the information on the breeder was not entered the individual would be unable to complete registration. This would help meet the EU's objective on allowing buyers to verify the authenticity of their purchase.

For those supplying puppies we would want the provision of the following information to the acquirer of the animal:

- the animal's date of birth
- the animal's sex
- details of any veterinary treatment
- the puppy's microchip number
- the date of the sale, giving away, or otherwise transfer of ownership of the puppy
- The inclusion of dog breed type (in all instances)
- and the mother's microchip number

We welcome the provision that database operators must ensure they are suitably set up to comply effectively with the regulations, including on data protection. This will ensure consistency, aid accessibility, and improve traceability.

Article 19 Microchipping is an important protection for both animals and their owners. However, due to the substantial number of databases in operation it can be difficult for owners to search, locate, add, or change their dog or cats' information.

Often microchips will hold out of date information, and in some instances, they have not been updated since the puppy's initial implantation. Furthermore, they are not interoperable, being owned by different private companies.

Dogs Trust has long called for a centralised, publicly accessible, single point of search within the UK, including Northern Ireland, making easier for owners to navigate the system, update their dog or cats' information and protect their pets. As such we welcome the regulations on registration within a national database and interoperability across EU member states.

The proposed national database should include all breeder details (including 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.

However, whilst the creation of this database and the regulations on interoperability would harmonise information sharing and search between Northern Ireland and the Republic of Ireland, this may create issues for the same between Northern Ireland and Great Britain. Although non-EU countries (including GB) exporting dogs and cats into Europe must also register animals accordingly and fulfil the basic welfare requirements, they would not be bound to the same requirements on interoperability, creating difficulty for pet owners, microchip database operators, and the respective administrations.

We would encourage joint working across the respective administrations to ensure that we are able to have full traceability across the EU and with Great Britain.

Timescales: Regarding the implementation timescales for this article, 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.

Dogs Trust would encourage the Northern Ireland Executive to pursue the regulation changes through domestic legislation. We strongly urge the Executive not to wait until the legislative timeframe set out within the new EU regulations, which could take over ten years to be fully implemented. Animals and owners cannot afford to wait up until ten years before these key changes are implemented.

Article 20 Dogs Trust welcomes the provision that competent authorities shall collect, analyse and publish the data set out in Annex III:

- Number of dogs and cats microchipped per year as referred to in Article 17.
- Number of breeding establishment approved per year as referred to in Article 16.

Furthermore, that there will be a harmonised methodology for data collection and reporting of the data collected to the Commission.

CHAPTER IV COMPETENT AUTHORITIES

Article 18 Training

Dogs Trust welcomes the regulation that certified training courses be made available for all animal caretakers.

Regulation of Animal Welfare Establishments and improved regulation of breeding establishments is something Dogs Trust has long called for, and provision of certified training courses is a positive move towards ensuring improved animal welfare standards within these sectors.

Dogs Trust would encourage DAERA / the competent authority to work with the charitable sector, including Dogs Trust, to ensure that suitable training courses for animal caretakers are provided as required.

CHAPTER V - ENTRY OF DOGS AND CATS INTO THE UNION

Article 21 Entry of dogs and cats into the Union

Dogs Trust welcomes the requirement within the regulation that dogs and cats to be placed for sale on the EU market are compliant with these regulations, the primary motivation being improving overall standards of animal welfare.

At present, there are no routine physical or documentary checks on the non-commercial movement of UK resident pet dogs, cats and ferrets travelling with their owners or authorised person between GB and NI. In Northern Ireland, should these regulations be adopted, individuals and organisations undertaking the non-commercial movement of animals from Great Britain into Northern Ireland will be subject to full EU third country requirements.

If implemented dog (and cat) owners must ensure they have:

- Fitted their pet with a transponder (microchip) that complies with EU Reg 576/2013.
- Applied to and joined the NI Pet Travel Scheme and have secured a Pet Travel document.
- Submitted their pet to both documentary and full identity checks when joining and leaving the point of access.

If any lack of compliance is found, then, they will be sent to an SPS (point of entry inspection) facility. As Great Britain, Northern Ireland and the Republic of Ireland all have a similar health status, we believe pet travel between Great Britain and Northern Ireland should be as safe, simple, and proportionate as possible.

We share and empathise with concerns about the impact and disruption that the new

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requirements may have on well-meaning pet owners travelling between Great Britain and Northern Ireland. However, robust checks for entry to the Republic of Ireland would be imperative given that there are no border checks between the Republic of Ireland and Northern Ireland. It is therefore impossible to prove whether a dog originated from the Republic of Ireland or Northern Ireland.

We are aware from Operations Delphin and Paws for Thought, multi-agency puppy smuggling taskforces led by the SSPCA and DEARA respectively, that this makes Belfast to Cairnryan (and similar passages) lucrative routes for individuals involved in illegal importation. In addition, ferries operate between the Republic of Ireland and the UK, including the port of Holyhead.

We have concerns that the island of Ireland could be used as a transit country for companion animals from mainland Europe, following the UK passing the Animal Welfare (Import of Dogs, Cats and Ferrets) Act; particularly underage puppies, destined for sale in Great Britain, which would potentially open another source for the introduction of disease. Considering significant profits that can be made there would be an increased incentive for unscrupulous importers to take this route if it becomes more difficult to import pet animals through Great Britain's ports.

The Republic of Ireland and Northern Ireland should also be viewed as a distinct epidemiological unit especially with regards to disease surveillance and outbreak preparedness. Extra consideration must be given to how, from a disease prevention and control point of view, the Island of Ireland can have an all-island approach and coordinated policy to prevent disease spread.

Chapter VII

Article 25 Stricter national measures

Dogs Trust supports the provision that Member States may maintain or adopt stricter national rules aimed at a more extensive protection of the welfare of dogs (and cats) kept in establishments and the traceability of dogs and cats. We recognise the rules must not be inconsistent with this Regulation and must not interfere with the proper functioning of the internal market.

Article 28 Entry in to force and application

Dogs Trust notes that there are several articles within the regulations whereby the timescales for entry in to force and application are longer than Dogs Trust would support.

As Article 25 provides for stricter national measures it gives the opportunity for DAERA and would be preferable to Dogs Trust to see similar, or more stringent legislative measures introduced faster and earlier than those outlined in the proposals. Instances are outlined in our response to each article.

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I give you permission to analyse and include my response in your results.