

BVA Northern Ireland Branch response to Windsor Framework Democratic Scrutiny Committee (DSC) consultation: Proposal for Regulation on the welfare of dogs and cats and their traceability

Question 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	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
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Comments

British Veterinary Association Northern Ireland Branch (BVA NI) supports the overall intentions of this Regulation to improve the welfare and traceability of dogs and cats. The proposed measures reflect many long standing BVA policy positions, including defining animal welfare legislation in line with the Five Domains model, the promotion of high welfare breeding practices, improved traceability, stronger oversight of operators, and enhanced controls on imports and cross border movements. In principle, raising and harmonising standards to reduce poor welfare, irresponsible breeding and illegal trade is always welcome.

On balance, BVA does not consider it likely that the application of this Regulation should, if appropriately and sensitively implemented, have a significant negative impact specific to the everyday life of communities in Northern Ireland (NI) in a way that is liable to persist. Many of the core welfare principles contained within the proposal are already reflected in the Welfare of Animals Act (Northern Ireland) 2011 and associated licensing regimes – as is explained further in the next question. In several areas, the Regulation would formalise or extend approaches that are already supported by the veterinary profession.

That said, there are important areas of divergence from existing NI law that must be recognised as creating potential misalignment and practical complexity in both the near and longer term.

First, the mandatory microchipping of cats represents a substantive change. BVA supports compulsory identification of both dogs and cats and has consistently advocated for improved traceability. However, microchipping of cats is not currently mandatory in NI. The proposal would therefore introduce new legal requirements for cat owners and operators both resident in NI and entering NI from the rest of the UK. To further bolster traceability, BVA recommends including in these requirements the inclusion of details of the dam and sire of the animal in their microchips. This will be particularly helpful for tracing the use of animals with excessive

conformation and inherited disease.

While most microchips used in the UK comply with ISO standards and are likely to be technically interoperable with EU systems, there is no current statutory requirement for interoperability, nor is there a single point of access across the multiple commercial microchip databases operating in the UK. The existence of several databases can already create tracing challenges, and achieving all cross-border interoperability requirements in this timeline may be challenging. Difficulties may also arise from the requirement to microchip cats within 3 months of birth due to their relatively small size at this age. In this context, England's deadline of microchipping cats by 16 weeks of age is more attainable.

Secondly, the higher and more explicit standards for breeders and operators, particularly in relation to breeding strategies, approval thresholds, accommodation standards, veterinary oversight, and euthanasia requirements, are broadly aligned with BVA policy. However, they may result in NI breeders being subject to requirements that differ from those in Great Britain (GB). This creates the risk of regulatory divergence within the UK internal market, additional enforcement complexity for councils and the NI Department for Agriculture, Environment and Rural Affairs (DAERA). It may also cause friction or outright prohibition where dogs and cats bred in GB do not meet the EU aligned requirements that would now be applicable in NI. If animals bred to GB standards cannot lawfully be placed on the market in NI, established trading patterns across the Irish Sea may be disrupted, and there may be implications for the gene pool for the breeding dogs and cats in NI.

Thirdly, the import and movement provisions, including pre-notification requirements for non-commercial movements and compliance conditions for animals placed on the market, may introduce additional administrative burdens on those moving within the UK for recreational and / or family reasons. In the absence of local agreements to address this, individuals travelling with dogs and cats from GB to NI, or from the Republic of Ireland (ROI) into NI, may face new procedural steps – even if the movement is for non-commercial reasons. While these may not be individually onerous, cumulatively they could create new costs, inconvenience and uncertainty for pet owners and small operators, as well as veterinarians who may be required to certify compliance with these new requirements. Lastly, this additional certification step may consume capacity in the public system's ability to monitor other border movements.

A further concern relates to market access into NI (and hence the rest of the UK) from the EU. Under the proposal, dogs and cats lawfully placed on the market in an EU Member State in compliance with this Regulation could not be prevented from being sold in NI, even if the UK were to maintain or introduce stricter welfare requirements in certain areas. BVA is reluctant to support a situation in which animals entering NI from the EU could be marketed freely within the UK despite not meeting stricter UK welfare rules, should such rules exist.

Finally, the provisions empowering the European Commission to amend technical standards and adopt delegated acts raise longer term concerns about regulatory drift. Changes to space allowances, breeding limits, microchip specifications, or other technical requirements without structured and ongoing engagement with NI stakeholders could exacerbate

divergence within the UK. Continued consultation with NI authorities and affected sectors will be essential to prevent this risk materialising.

In summary, BVA supports the welfare objectives and does not anticipate a significant and persistent negative impact on everyday life in NI, assuming appropriate implementation with due sensitivity and regard to a pan-UK perspective. Nevertheless, the areas of divergence identified above warrant careful consideration to ensure legal clarity, proportionality, and the avoidance of unintended cross border and intra UK complications, costs and frustrations.

Question 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	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
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Comments

BVA does not consider it likely that not applying the proposed EU Regulation would have a significant negative impact specific to the everyday life of communities in NI in a way that is liable to persist.

NI already has an established and robust statutory framework for animal welfare, most notably under the Welfare of Animals Act Northern Ireland 2011 and associated licensing regimes. The core welfare principles set out in the proposed Regulation, including duties relating to nutrition, environment, health, behavioural needs and protection from unnecessary suffering, are broadly reflected in existing NI law. In practical terms, many of the day-to-day protections afforded to dogs and cats would therefore remain in place even if the Regulation were not applied.

BVA strongly supports the Regulation’s articulation of welfare in a manner consistent with the Five Domains model, which recognises nutrition, physical environment, health, behavioural interactions and mental or emotional state. We consider this framework to represent best practice and believe it should underpin all UK animal welfare legislation. We are also pleased to see consistent mentions of the importance of positive welfare indicators, rather than just the absence of negatives.

There are areas where the Regulation provides for higher standards than current NI legislation and so may not be enjoyed by dogs and cats in NI without the application of the Regulation.

For example, the Regulation makes specific reference to excessive conformational traits and generally prohibits the breeding and showcasing of animals whose conformation is detrimental to their health and welfare. In NI, such issues are addressed indirectly through general welfare offences and licensing conditions rather than through explicit statutory language. BVA firmly believes animals with extreme conformations that negatively affect their welfare should not be used for breeding, and that neutering should be encouraged to prevent perpetuation of such traits. We also support responsible advertising and believe animals with extreme conformations should not be normalised through shows, exhibitions, marketing materials, social media or television. Not applying the Regulation would mean NI does not benefit from these clearer and more direct provisions, at least in the short term.

Similarly, we support the principle of requiring a responsible ownership warning in

advertisements. Research shows that one in four owners in the UK, equating to millions of people, admit to doing no research before acquiring a pet. A puppy or kitten should never be acquired on impulse. Pets are not toys and ownership is a life changing commitment. While NI licensing guidance requires provision of certain information to buyers, a standardised warning in advertising could reinforce responsible decision making. BVA has long promoted the Puppy Contract as a tool to support informed purchasing and responsible breeding, and we support the measures in this Regulation that require operators to give acquirers of dogs or cats the written information necessary for them to ensure the welfare and specific needs of the animal in terms of feeding, caring, health, housing and behavioural needs.

Although there are areas where this Regulation advances beyond the current NI legislative landscape, it should be noted that there is already policy development underway in NI and the rest of the UK that may close this gap in the coming years. Microchipping of cats, for instance, is now mandatory in England, and DAERA has indicated its intention to consult on similar measures for NI.

Similarly, the Animal Welfare Strategy announced in December 2025 in England includes a commitment to consult on banning electric shock collars similar to what is proposed in this Regulation. This is a step BVA has long supported, alongside our broader caution regarding other aversive training devices.

In addition, the recently passed Animal Welfare (Import of Dogs, Cats and Ferrets) Act will strengthen safeguards against puppy smuggling and low welfare imports, in particular regarding mutilations such as ear cropping and declawing.

These developments suggest that, even if the Regulation were not applied, NI and the wider UK have already been moving in a similar direction in several of the proposed key areas for some time.

In summary, while there are elements of the proposed Regulation that would enhance clarity or strengthen certain standards in NI, existing legislation already provides a substantial welfare framework. Furthermore, domestic policy development indicates that many of the Regulation's stronger elements are being considered or are already implemented within the UK context. For these reasons, BVA does not consider that not applying the proposed act would be likely to result in a significant and lasting negative impact on everyday life in Northern Ireland communities.

Question 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.

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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Comments

<p>It will be recalled that earlier post-Brexit arrangements governing the movement of companion animals across the Irish Sea gave rise to well evidenced complexity, additional costs and considerable confusion for pet owners and veterinary professionals in both NI and GB. They also led to unnecessary politicisation of issues relating to animal health, welfare and traceability.</p> <p>If the Regulation proceeds, it is essential that their implementation avoids recreating those difficulties. In particular, it should not reintroduce disproportionate administrative burdens, uncertainty or cost for owners and vets, nor disrupt the now more settled arrangements for the movement of companion animals within the UK, especially where any additional animal health or welfare benefit may be limited.</p>
