

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

## **Consultation Response – Cats Protection**

### **Impact of EU Act**

- 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?**

No.

#### **Tell us why:**

Cats Protection believes the proposed EU Regulation on the welfare of dogs and cats and their traceability would not have a significant negative impact on the everyday life of communities in Northern Ireland. The charity also believes that the proposed Regulation is consistent with other current animal welfare legislation and the ambitions of Minister Muir's Animal Welfare Pathway. Cats are a large part of everyday life in communities across Northern Ireland, from the 22% of households that share their home with a cat to the countless unowned and community cats that also rely on local people for care (Cats Protection's Cats and Their Stats (CATS) Report Northern Ireland 2025). Applying the proposed Regulation would have a positive significant impact on the everyday lives of communities in Northern Ireland.

- 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.

#### **Tell us why:**

Cats Protection welcomes the proposed EU Regulation on the welfare of dogs and cats and their traceability. Cats Protection believes not applying the proposed Regulation could have a negative impact on the everyday life of communities in Northern Ireland. The proposed Regulation looks to end "misleading or deceptive trade practices, including illegal trade, where dogs and cats are kept in conditions that are highly detrimental to their welfare". Demand for cats has grown both in the EU and Northern Ireland. Latest figures show the cat market in Northern Ireland has grown by 20,000 cats from 230,000 cats in 2023 to around 250,000 cats in 2025 (Cats Protection's Cat and Their Stats (CATS) Report Northern Ireland 2023 and 2025). It is just as important that communities in Northern Ireland are protected from the illegal pet trade as those in the EU.

Another aim of the proposed Regulation is setting minimum welfare standards for "operators of breeding establishments, selling establishments, shelter and operators

that place and are responsible for dogs or cats in foster homes”. This will bring an end to poor breeding practices, and stop cats being bred or cared for without any or consistent welfare standards, leading to serious health, behavioural, and welfare problems.

In addition, the proposed Regulation aims to improve the traceability of cats. This will also help combat illegal trade and negative animal welfare in the EU cat market. Requiring every pet cat to be microchipped and registered on a national database, means the establishment of origin can be traced if needed.

Cats Protection believes that the intention of this proposed Regulation is consistent with current and proposed legislation in Northern Ireland. The proposed Regulation recognises dogs and cats as “sentient beings that are able to experience emotions, pain and social interactions”. In 2024, the Pet Abduction Act 2024 came into force. For the first time in Northern Ireland cats were seen as more than just property as this Act considered the sentience of the animal. In the consultation on new rules for selling and supplying puppies and kittens, Minister Muir set out proposals to tackle the third-party sales of puppies and kittens which seeks to “aid transparency and make it easier to identify individuals who are operating in ways which compromise animal welfare.” (<https://www.daera-ni.gov.uk/sites/default/files/2025-05/Consultation%20on%20new%20rules%20for%20selling%20and%20supplying%20puppies%20and%20kittens>)

### Microchipping

The proposed Regulation states “[a]ll dogs and cats kept in establishments placed on the market or owned by pet owners or by any other natural or legal persons, shall be individually identified by means of a...microchip” and registered in a national database. This allows for full traceability of the animal’s identity, current and previous owners and its establishment of origin.

Cats Protection strongly supports the requirement for all pet cats to be microchipped in the proposed Regulation. Microchipping of pet cats is not compulsory in Northern Ireland. Microchipping rates have continually fallen over the past three years in Northern Ireland from 67% of cats being microchipped in 2023 to 60% in 2025 (Cats Protection’s Cats and Their Stats (CATS) Report Northern Ireland 2025). This is a worrying trend. Cats Protection is calling for compulsory microchipping of cats to be introduced in Northern Ireland and believes that the proposed Regulation would support this. Minister Muir’s Animal Welfare Pathway also includes “examining the case for mandatory microchipping of cats”.

Microchipping is a safe and permanent way to identify an owned cat. The best way to reunite lost, stolen or abandoned cats with their owners is through microchip details. If the cat is found injured and taken to a vet, those details will enable a vet to contact the owners. In the sad case where a cat is found dead, having up-to-date microchip details will at least enable the owner to get closure. Around 100,000 cats

in Northern Ireland are still potentially without a microchip, reducing their chances of being reunited with their owners, should they get lost or stolen (Cats Protection's Cats and Their Stats (CATS) Report Northern Ireland 2025). 24% of people who have not microchipped their cat say they haven't done so because "they hadn't thought about microchipping my cat" (Cats Protection's Cats and Their Stats (CATS) Report Northern Ireland 2025). Cat owners need incentive to microchip their pets as they are not proactively doing so.

Stray cats without a microchip consistently remains one of the top reasons cats come into our Northern Ireland Cat Centre. Trying to find these cats' owners puts a burden on our team and takes up space in pens for cats that need us the most. If the cats' owners cannot be found, then the cats are needlessly rehomed, leaving their loving family unaware of what has happened to their beloved cat. The high number of cats without microchips also puts a burden on the Trap Neuter and Return (TNR) work Cats Protection and other organisations do to control feral cat populations. In areas where there are high numbers of owned and feral cats it can be difficult to quickly distinguish feral cats from owned cats without a microchip. This takes up staff and volunteers' time trying to trace owners, which could be spent carrying out much needed TNR work. If every owned cat in Northern Ireland was required to be microchipped and have their details kept up to date this would lessen the burden on the animal welfare sector.

### Cat breeding

The proposed Regulation states it will set out "minimum requirements for the welfare of dogs and cats that are bred and kept in establishments". In Northern Ireland, beyond the Welfare of Animals Act (Northern Ireland) 2011, there are no safeguards for kittens, pregnant or nursing cats and male stud cats. This means kittens are being sold sick and underage, female cats in ill health may be overbred, giving birth to repeated litters in poor conditions and male stud cats are being kept in inadequate accommodation with a lack of essential items.

Buying is the most popular way cats are acquired in Northern Ireland, with 75,000 of all pet cats in the country being bought (Cats Protection's Cats and Their Stats (CATS) Report Northern Ireland 2025). Although, the price of cats is not comparable with the high prices advertised for puppies, selling pedigree kittens can be profitable. Prices for popular pedigree kittens range from £800-£2,000 on selling sites like Pets4Homes. Applying the proposed Regulation to Northern Ireland would improve welfare.

The proposed Regulation sets out minimum standards for breeding establishments. Cats Protection is calling for Northern Ireland to also regulate cat breeding. Although the proposed Regulation does not give exact detail of conditions for the minimum standards, Cats Protection supports that it mentions "proper feeding, veterinary care, and protection from abuse" and a "minimum and maximum age of bitches and queens for onset of breeding". Cats Protection recommends anyone breeding two or

more litters per year (be it from a single cat or multiple cats in the same premises) should be licenced for cat breeding. Conditions of the licence should require that:

- a single cat should have no more than six litters in their lifetime and a maximum of three litters within a two-year period
- a female cat should not be bred after six years of age due to the increased risk of difficulty during labour, birth defects in the kittens and physiological stress

Cats Protection also strongly supports the proposed Regulation recognising the negative welfare impacts of cats being bred with extreme characteristics. The proposed Regulation states “[o]perators of breeding establishments shall not use for reproduction dogs or cats that have excessive conformational traits leading to a high risk of detrimental effects on the welfare of these dogs or cats, or of their offspring.” The charity also strongly supports the proposed Regulation’s reference to hybrid cats: “[h]ybridisation should not be encouraged as hybrids are not as domesticated as dogs and cats. Given the significant difficulty in meeting the specific behavioural needs of hybrids and the discomfort or suffering that will result thereof, breeding to produce hybrids should be prohibited.”

Cats Protection is calling for a ban the breeding of cat with extreme characteristics and wildcat hybrids. For the first time, the number of pedigree cats acquired in the last 12 months exceeds moggies, and the gap between purchase and adoption is wider for cats acquired in Northern Ireland in the last 12 months (Cats Protection’s Cats and Their Stats (CATS) Report Northern Ireland 2025). This is concerning as there has been an emergence of cats that are bred with extreme characteristics and wildcat hybrids. Sadly, some breeds are being bred with harmful features, putting the appearance of the cat over their health and welfare. Often, this can also lead to a lifetime of pain and suffering for the cat as well as high, unexpected vet bills for owners. This is the case for the Scottish Fold, known for their folded ears and ‘round’ appearance. The mutation causing the folded ear affects the whole body and causes Scottish Folds to have serious health problems causing continuous and debilitating pain in all cats of this breed. Other breeds of concern are Munchkin cats that have a form of dwarfism and suffer from joint deformities which can reduce their mobility and ability to exhibit normal cat behaviour. XL Bully cats, also known as ‘Dwelf’ cats, suffer from physical deformities, including shortened legs, hairlessness, excessively wrinkled skin and curled ears. Cats Protection is also concerned about cats with brachycephalic features such as extreme flat-faced Persians or Himalayans.

Cats Protection also strongly supports the proposed Regulation looking to stop the promotion of cats with extreme characteristics and mutilations: “operators of breeding and selling establishments and the organisers of such shows, exhibitions and competitions should not use or include dogs or cats with excessive conformational traits or those which have been mutilated for these shows, exhibitions or competitions.” Sadly, the public are often driven to make purchases because the popularity of a breed, opposed to the welfare of the animal. Unfortunately, this can

lead to unsuspecting owners buying fashionable designer breeds such wildcat hybrids, like Savannahs, which are a cross between domestic cats and exotic wildcats, who are often poorly suited temperamentally to life in a domestic environment, exhibiting territorial behaviour and are stressed when kept as pets within the home. These are essentially wild cats. They also represent a threat to neighbourhood cats if let outside to roam free. Unfortunately, owners who have not done enough research about the cat breed they are buying will be faced with high vet bills or forced to relinquish their pet to a rehoming organisation like Cats Protection, who already has high wait times.

### Online sales

Cats Protection believes that a different system for cats and dogs needs to be applied in regards to microchipping and placing cats for sale. The proposed Regulation's would require that "all dogs and cats will have to be microchipped and registered in a national database before they are placed for sale on the market".

However, if microchipping regulations were introduced in line with the regulations in England cats would not be required to be microchipped until they are 20 weeks old. Adverts for cats between 8-20 weeks should clearly show the cats age and then deadline when they need to be microchipped and registered in a national database. Cats Protection would be happy to discuss further how a system would work in practice.

When over 20 weeks of age a cat should always be advertised for sale with its microchip number. Cats Protection research has found of all cats purchased in the UK, 63% were bought from online sources (Cats Protection's Cats and Their Stats (CATS) Report 2025). The trend of buying cats online has attracted unscrupulous individuals who have found ways around selling restrictions on pet websites and social media. In Northern Ireland, cats and kittens are being falsely advertised, so they can be sold underage, sick or weaned too young. Tighter rules on selling will support Minister Muir's current proposals to ban the third-party sale of kittens, where anyone looking to sell a kitten must be the breeder and register with their local council.

Cats Protection is a member of the Pet Advertising Advisory Group (PAAG) and works to tackle irresponsible advertising of pets for sale by setting out advertising standards, which many of the popular classified sites sign up to. Cats Protection has also been piloting a new programme, where volunteers monitor the adverts on popular online platforms to ensure good welfare practices are being met. Any adverts that don't meet the requirements set by PAAG are reported to the websites and logged with Cats Protection. This includes adverts where the kitten photographed isn't with their mother, or their age and sex isn't listed. During this monitoring we have found adverts from sellers in Northern Ireland offering cats for sale with options for international or worldwide shipping. This is concerning and highlights that the issue isn't isolated to Northern Ireland.

The charity has had success with removing illegal ads from social media and with platforms like Gumtree but more needs to be done. Action Fraud reported over 14,000 incidents of pet scams since 2019, totalling £7.2 million being lost to pet scams (<https://www.independent.co.uk/news/uk/home-news/pet-scam-warning-dog-scam-b2804251.html>).

### Shelters and foster homes

The proposed Regulation aims to establish “minimum standards for breeding, housing, care and treatment” for animal shelters and foster homes. Although, the DAERA Minister has yet to publish his plan for the regulation of rescue and rehoming organisations, he has committed to this in his Animal Welfare Plan. Cats Protection believes applying the proposed Regulation to Northern Ireland will improve the lives of people engaging with the animal rehoming sector, whether that be as a volunteer, member of staff or through adoption or relinquishment.

One of the hardest decisions someone can make is to give up their beloved pet. Often it is due to circumstances out of their control: a landlord will not let them keep their cat, due to illness or job loss. When they give up their pet, they want to make sure they will be taken care of properly. Although those who take animals into their care usually do so with the very best of intentions, sometimes the standards of animal welfare in such settings can fall short. While anyone caring for animals must meet their five welfare needs set out in the Welfare of Animals Act (Northern Ireland) 2011, there is no specific regulation of animal welfare establishments in place. The proposed Regulation would require operators of animal shelters and foster homes to register and “the competent authorities keep an updated register of these establishments”. This register will give peace of mind to both adopters and those giving up their beloved pets that their animal is being looked after by a rescue meeting a minimum standard of care.

Cats Protection is calling for a set of minimum standards to protect animals in care to be introduced in Northern Ireland. By ensuring that all rehoming organisations in Northern Ireland meet the same minimum set of standards it would give potential adopters peace of mind that their new pet has been properly health checked, is microchipped and has had the best start in life. Cats Protection is a member of the Association of Dog and Cat Homes. To be a member of ADCH you must meet their minimum standards, which Cats Protection believes could be used for the basis of licensing proposed Regulations are there are rehoming organisations and a council operated pound that are already ADCH assessed(<https://adch.org.uk/minimum-standards/>).

Cats Protection strongly believes not applying the proposed Regulation would have a negative effect on the lives of cats and the thousands of people who love them. Applying the proposed Regulation to Northern Ireland would strengthen current and proposed legislation, combat the illegal pet market and stomp out unscrupulous breeders and sellers who put profit over welfare.

**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

**Tell us why:**

Cats Protection would welcome discussing the proposals in this Regulation in more detail as they advance.