

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

Consultation Response – Four Paws

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:

Northern Ireland already has a mature framework for dog identification and licensing: dogs must be microchipped by 8 weeks; a dog licence requires microchipping; and owner details must be recorded on a database accessible to council officers (NI Direct; Dogs (Licensing and Identification) Regulations (Northern Ireland) 2012).

DAERA's Assessment of Impact on the provisionally agreed text (16 January 2026) concludes that the proposed act, if applicable in Northern Ireland, would not have a significant negative impact specific to everyday life of NI communities that is liable to persist, while noting additional requirements would fall on particular actors (breeders, sellers, rescue/rehoming shelters and foster arrangements, microchip database operators, and cat owners). DAERA also notes that small business operators and rescue/rehoming organisations are exempted where they do not meet numerical thresholds.

The provisionally agreed text provides for a staged timetable for application (with the Regulation generally applying from two years after entry into force, and specified later start-dates for certain provisions). In particular, the text provides extended lead-in periods for identification/registration obligations for pet owners who do not place dogs or cats on the market (10 years for dogs and 15 years for cats), supporting the view that any effects on ordinary pet ownership would not be abrupt or widespread.

The UK Government's Explanatory Memorandum states the proposal is not aimed at individuals travelling with their own pets under non-commercial pet travel rules and that, if applied in NI, it would not affect the Northern Ireland Pet Travel Scheme introduced via the Windsor Framework. Taken together, any day-to-day impacts for the wider public appear more likely to arise from administrative implementation (e.g., database specifications/interoperability and online verification functionality) than from restrictions on ordinary pet ownership or travel.

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:

The UK Government's Explanatory Memorandum (EM) recognises that the illegal trade in dogs and cats has "soared" and that growth in online sales has accelerated the problem, while the absence of common traceability rules allows illegal trade to persist. Not applying COM/2023/769 in Northern Ireland would therefore risk leaving a persistent enforcement and welfare gap in a jurisdiction that already features in known trafficking dynamics on the island of Ireland and through NI ferry ports.

Animal welfare harms linked to cross-border illegal trade (ROI ↔ NI / NI ↔ GB): A BBC NI Spotlight investigation referenced by the ISPCA estimated that around 30,000 puppies are smuggled from Ireland to the UK each year, describing a multi-million illegal trade. Parliamentary evidence and DSC-published stakeholder evidence further emphasise that, because there are no border checks between the Republic of Ireland and Northern Ireland, it can be impossible to prove origin—making routes such as Belfast–Cairnryan attractive for illegal importation and onward sale. DAERA's own "Paws for Thought" material describes rogue breeders and puppy traffickers attempting to move low-welfare pups via NI's main ferry ports for "huge profit", often obscuring origins and making false declarations while "innocent animal lovers are duped".

These trafficking patterns are closely associated with serious, avoidable welfare outcomes: puppies bred in poor conditions, removed from dams too early, transported long distances, and sold with increased risks of illness and behavioural problems - harm that then falls onto families, vets, rescues and local authorities. FOUR PAWS' UK report Tricks of the Trade documents how online trade and weak verification enable this, including findings that over a third of respondents found their puppies through social media, and that most puppies with health issues were advertised through social media; it also reports that almost a third of puppies sold below seven weeks were advertised through Instagram.

Online market as an enabler of illegal trade and cruelty: FOUR PAWS' Meta investigation (Sept 2023–June 2024) analysed hundreds of puppy advertisements on Facebook and Instagram that violated platform rules and/or relevant laws; the summary reports that even after a sample of suspicious ads was reported, most were not removed, allowing the illicit trade to thrive. The same body of evidence indicates that social media enables large audiences, fast turnover, and evasive tactics by unverifiable sellers - conditions that systematically undermine enforcement and increase welfare harm.

Why non-application would leave NI communities exposed (persistently): COM/2023/769 contains mechanisms directly relevant to these harms -most notably stronger traceability and online-sale controls. The provisionally agreed text requires online advertisements to display a verification token generated through a

Commission-supported verification system, and places compliance duties on online platforms to enable that verification journey. If NI does not apply the act, NI consumers and enforcement bodies would remain more exposed to:

- continued sale of sick/underage puppies via low-accountability online channels (welfare harm; consumer detriment);
- ongoing criminal exploitation of gaps created by limited cross-border proof of origin and weak traceability;
- sustained pressure on vets, rescues and councils responding to welfare cases and preventable disease outbreaks linked to irresponsible breeding and movement.

Finally, the UK has recently strengthened its approach through the Animal Welfare (Import of Dogs, Cats and Ferrets) Act 2025 (commonly referred to as the “Puppy Smuggling” law), described by Government as a measure to strengthen pet travel rules and disrupt those profiting from animal suffering. Applying COM/2023/769 in NI would complement that direction of travel by addressing the domestic/online supply chain and traceability architecture that illegal traders exploit, helping prevent displacement of illegal activity into regulatory gaps and supporting persistent reductions in animal suffering and consumer harm.

Conclusion: On the evidence above, it appears likely that not applying the proposed act would have a significant negative impact on everyday life in NI communities, through ongoing welfare harms, consumer detriment, and enforcement burdens associated with illegal breeding/trafficking and online sales, and that these impacts are liable to persist without the additional traceability and online-verification measures

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:

DAERA assessment of everyday-life impact (January 2026): DAERA's updated assessment concludes “No” to the question of whether applying the act would have a significant, persistent, everyday-life impact. It notes that additional requirements would fall primarily on specific actors (cat and dog breeders; rescue/rehoming shelters including foster carers; persons selling cats/dogs as pets; microchip database operators; and cat owners, as cat microchipping is not currently compulsory in NI). DAERA also notes that the rescue/rehoming sector is not currently subject to regulation in NI, and records that the DAERA Minister has committed to exploring the merit of domestic legislation on cat microchipping, selling/supplying pups and kittens, and rescue/rehoming operations. (DAERA, Updated Initial Assessment, Jan 2026, “Assessment of Impact”, pp. 3–4).

- Welfare and traceability measures relevant to animal welfare and public confidence: The NI Assembly’s departmental assessment summarises that COM/2023/769 would introduce EU-wide minimum welfare provisions for establishments (including housing/handling standards, competencies/training for animal caretakers, annual welfare advisory veterinary visits, and restrictions on harmful breeding practices), alongside strengthened identification/registration and database interoperability provisions intended to improve traceability and consumer verification -particularly for online sales. (NI Assembly, Departmental Initial Assessment of Impact (Annex C), COM/2023/769, pp. 1–2).
- Online sales / platform accountability: Evidence from FOUR PAWS’ investigations indicates that online sales environments can enable anonymity, deceptive advertising, and repeat offending, and that platform moderation/enforcement has often been ineffective. FOUR PAWS’ Social media vs reality report found widespread illicit puppy trade activity across Meta platforms and reported that only 2 of 64 samples reported to Meta were removed. (FOUR PAWS, Social media vs reality, 2024).
- Enforcement capacity gaps and why mandatory traceability matters: FOUR PAWS’ FOI-based enforcement research describes a “postcode lottery” in local authority enforcement capacity, including limited evidence that complaint volumes (including those concerning unlicensed breeders) translate into increased inspection effort, and identifies gaps in monitoring/record-keeping that hamper enforcement. The report also notes that the illegal/unlicensed puppy breeding market is associated with serious organised, transnational criminality and should be prioritised accordingly. (FOUR PAWS UK, Puppy breeding and licensing: a postcode lottery of enforcement).
- Illegal puppy smuggling into the UK: FOUR PAWS report on that revealed how the illegal puppy trade in the UK is widespread, highly deceptive, and fuelled by online loopholes, with serious welfare consequences for dogs and distress for unsuspecting buyers. Almost half of puppies sold on Gumtree were illegally imported, often from Eastern Europe, where they were bred in poor conditions and transported long distances in cramped cages. Large-scale commercial breeding prioritises profit over welfare, with puppies often coming from “farms” or “mills” where disease, poor socialisation, and neglect are common, and exploiting online platforms as a means to bypass regulations. (FOUR PAWS UK, Tricks of the Trade report)
- Cross-border puppy trafficking and organised criminality (animal welfare implications): A BBC NI investigation (as reported by ISPCA) suggested an estimated 30,000 puppies are smuggled from Ireland to the UK each year, describing Northern Ireland as a “gateway” for the trade and highlighting exploitation of legislative loopholes and ferry routes. ISPCA reports uncovering multiple unlicensed puppy farms and removing hundreds of dogs, and calls for a multi-agency approach

spanning breeding, identification, transport and sale, and proceeds of crime. (ISPCA news item referencing BBC NI Spotlight investigation, 19 Oct 2021).

- UK Parliament evidence on welfare harms from illegal importation: Written evidence to a UK Parliamentary inquiry on puppy smuggling highlights severe welfare harms linked to illegal trade, including very young puppies entering the UK (reported as young as 4 weeks), and concerns around ineffective enforcement. (House of Commons Committees, Dogs Trust written evidence on Puppy Smuggling).
- NI dog microchipping/licensing baseline: NI already has mandatory microchipping linked to dog licensing, and NI Direct sets out the requirement to microchip and license dogs and keep details up to date. This existing baseline may be operationally relevant when considering database access/administration and enforcement delivery in NI. (NI Direct, Dog licensing and microchipping).
- Pet travel and cross-border movements: The UK Government Explanatory Memorandum states the proposals are not aimed at non-commercial pet travel and, if applied in NI, would not affect the Northern Ireland Pet Travel Scheme. It also states that if applied in NI, trade/rehoming of dogs and cats between NI and the EU via the land border would not be affected because both territories would be operating to the same standards. (UK Government Explanatory Memorandum, COM/2023/769, paras 12–13 and 20).

References list

- NI Direct, “Dog licensing and microchipping”.
- The Dogs (Licensing and Identification) Regulations (NI) 2012 (legislation.gov.uk).
- NI Assembly Official Report (Minutes of Evidence) re microchipping/licensing baseline.
- Dogs Trust – Written Evidence PSM0014 - Evidence on Puppy Smuggling
- USPCA Animals Seized as part of Operation Delphin | Ulster Society for the Prevention Cruelty to Animals
- USPCA - BBC One NI investigates an estimated 30,000 puppies smuggled from Ireland to the UK each year - ISPCA
- Crown Office - Parents warned Christmas puppy purchases could fund organised crime gang networks
- UK Government Explanatory Memorandum for COM(2023) 769.
- DAERA Assessment of Impact on the provisionally agreed text (16 Jan 2026).