

Title of Report:	Consultation on New Rules for Selling and Supplying Puppies and Kittens
Committee Report Submitted To:	Environmental Services Committee
Date of Meeting:	9th September 2025
For Decision or For Information	For Decision
To be discussed In Committee	No

Linkage to Council Strategy (2021-25)	
Strategic Theme	Healthy, Active and Engaged Communities
Outcome	Provide a consultation response
Lead Officer	Head of Health & Built Environment

Estimated Timescale for Completion	
Date to be Completed	N/A

Budgetary Considerations	
Cost of Proposal	N/A
Included in Current Year Estimates	N/A
Capital/Revenue	N/A
Code	N/A
Staffing Costs	N/A

Legal Considerations	
Input of Legal Services Required	NO
Legal Opinion Obtained	NO

Screening Requirements	Required for new or revised Policies, Plans, Strategies or Service Delivery Proposals.		
Section 75 Screening	Screening Completed:	N/A	Date:
	EQIA Required and Completed:	N/A	Date:
Rural Needs Assessment (RNA)	Screening Completed	N/A	Date:
	RNA Required and Completed:	N/A	Date:
Data Protection Impact Assessment (DPIA)	Screening Completed:	N/A	Date:
	DPIA Required and Completed:	N/A	Date:

1.0 Purpose of Report

- 1.1 The purpose of this report is to provide a Causeway Coast and Glens Borough Council response to the consultation.

2.0 Background

- 2.1 The Department of Agriculture, Environment and Rural Affairs (DAERA) is seeking views on a proposal to introduce a registration system for persons selling, giving away, or otherwise transferring ownership of puppies and kittens aged under six months old.
- 2.2 A key objective of DAERA is to end third-party sales of puppies and kittens. A third-party sale is a sale that occurs when the seller has not bred the animal themselves but has obtained the puppy or kitten from a breeder so that they can sell it onwards.
- 2.3 The consultation paper is divided into four chapters. Chapter two provides some background to selling pet animals in Northern Ireland, and the legislation in place in other jurisdictions. Chapter three details DAERA's proposals.
- 2.4 DAERA has previously engaged with councils on the proposals and acknowledges within the consultation the concerns raised which include resource implications and the extension of enforcement responsibilities to include cats. DAERA are therefore specifically inviting detailed feedback from councils relating to the administration and enforcement of their proposals as well as any additional or alternative measures which could be put in place to deliver the objectives of improving the welfare of puppies and kittens.
- 2.5 The full consultation document can be found at:

<https://www.daera-ni.gov.uk/consultations/public-consultation-proposed-new-rules-sale-and-supply-puppies-and-kittens-northern-ireland>
- 2.6 Attached as Appendix 1 is a suggested response to the consultation.
- 2.7 The initial date for submission of responses was 25th August 2025. However, Councils have been granted an extension until 15th September 2025, with the submitted response subject to subsequent endorsement and approval by full Council.

3.0 Recommendation

It is recommended that Council endorses the response.

Draft Consultation response on New Rules for Selling and Supplying Puppies and Kittens in Northern Ireland

Q1. What is your name?

Causeway Coast and Glens Borough Council, "Council".

Q2. What is your email

Environmental.health@causewaycoastandglens.gov.uk

Q3. Are the views and opinions in your response personal or expressed on behalf of an organisation?

Organisation

Q4. Please indicate if you are happy for your response to be published.

Yes

Q5. If you are responding on behalf of an organisation, please indicate if you are content for the name of the organisation to be associated with your response.

Yes

Q6. Do you agree that any person who wishes to sell, give away, or otherwise transfer the ownership of puppies should be required to register with their local council?

No. Council acknowledges that this proposed registration scheme is the first of several anticipated changes to animal welfare (AW) legislation, with the Department of Agriculture, Environment and Rural Affairs (DAERA) indicating that additional responsibilities may be assigned to councils in the future. However, Council believes that other reforms, such as a comprehensive review of dog breeding legislation and the regulation of rescue and rehoming centres, should take priority before introducing the proposed registration regime.

While Council supports any legislation aimed at improving animal welfare, Council does not agree that councils should be mandated to take on this new legal requirement to register puppies. Instead, Council recommends further exploration of alternative organisations to facilitate this responsibility, such as DAERA itself, the USPCA, and other animal welfare charities. Additionally, Council advocates for the establishment of a centralised registration system for Northern Ireland, similar to the scheme managed by the Department of Agriculture, Food and the Marine in the Republic of Ireland.

During prior engagement, there was no indication that these new functions would be self-funding. Council considers that engagement with councils on key issues, particularly regarding fee structures and full cost recovery, has been insufficient. This proposal reflects a concerning and growing trend of central government devolving enforcement responsibilities to local government without a corresponding transfer of adequate resources, powers, or legal protections. Councils cannot continue to absorb additional responsibilities by default, especially when they fall outside core remit and expertise.

It is also important to note that DAERA has recently withdrawn funding from councils for the animal welfare function. Furthermore, the introduction of the XL Bully legislation has already significantly increased the workload of council dog warden teams, again without additional funding for ongoing costs. Any further delegation of animal welfare responsibilities to councils by DAERA, without adequate and sustained funding, will have significant financial implications.

The animal welfare service currently operates a dedicated software system exclusively for animal welfare functions, which is separate and independent from the dog warden system used for dog licensing and service requests. Implementing the proposed puppy registration system would require significant investment to enable registration, annual renewals, fee management and the creation of a publicly accessible register. The Council has concerns regarding how such IT upgrades would be funded under the proposed self-funding model.

Although inspections are not anticipated as part of the scheme, any complaints and enforcement actions arising from the registration process will necessitate inspections carried out by suitably trained staff. Initial costs will be required to implement a computer system capable of recording registration details, generating a public register and managing registration fees. Ongoing costs will include system maintenance, vehicle expenses, and staff salaries inclusive of employer cost.

Q7. Do you agree that any person who wishes to sell, give away, or otherwise transfer the ownership of kittens should be required to register with their local council?

No. Council is aware that this is the first of a number of potential changes to Animal Welfare legislation where DAERA proposes to allocate additional responsibilities to Councils.

Council is of the opinion that other reforms need to be addressed prior to the introduction of the proposed registration regime, and that the review of dog breeding legislation and the regulation of rescue and rehoming centres remain the priority.

Whilst any legislation improving animal welfare is welcomed, Council does not agree that Councils should be responsible for the new legal requirement for kittens to be registered as enforcing such legislation would pose significant practical challenges for local councils. The free-roaming behaviour of cats and the prevalence of feral populations make it difficult to establish ownership, particularly in the absence of consistent and verifiable microchipping.

Given these enforcement limitations, Council recommends that any proposals involving kittens be excluded from council responsibilities. Instead, such measures should be coordinated by animal welfare charities such as Cats Protection that are already experienced in delivering effective microchipping and Trap, Neuter, Return (TNR) programmes. It is noted that the Department of Agriculture, Food and the Marine are responsible for a registration scheme in the Republic of Ireland.

Council also expresses concern about the potential criminalisation of individuals who responsibly rehome pets by giving them to friends or neighbours. While we acknowledge that exempting these informal transfers could create enforcement gaps, it is important to adopt a proportionate and balanced approach that does not penalise well-intentioned behaviour. At the same time, we recognise that allowing transfers without registration could provide opportunities for uncontrolled distribution, including the risk of commercial exploitation. This remains a concern, and any legislative framework must seek to mitigate such risks without imposing disproportionate burdens on responsible pet owners or councils.

Q8. Do you agree with the proposed list of exempted groups who will be exempt from the proposed new rules?

Yes. Council supports the inclusion of exemptions to the proposed registration requirements but emphasises the need for these to be clearly defined and tightly managed. We agree that registered animal rescue and rehoming charities should be exempt, given the essential role they play in safeguarding animal welfare. However, to prevent abuse of this exemption, it should only apply to organisations officially registered with the Charity Commission for Northern Ireland.

We also agree that council-operated dog pounds should be exempt, as these are subject to existing controls and oversight. Where kennelling services are outsourced to private contractors on behalf of councils, these contractors should be subject to the proposed registration rules to maintain consistent standards.

Furthermore, Council supports the exemption of individuals who are surrendering animals to a registered charity or rehoming organisation or who acquired the pet from a legitimate source but later decide they cannot keep it. These individuals are not breeders and therefore should not fall within the scope of the registration requirement.

We also support the proposal to restrict the movement of puppies and kittens under 6 months old, which would help prevent misuse of exemptions by third-party sellers.

Q9. Do you agree that the first year of registration should be free of charge, except for businesses?

No. Council does not agree with the proposal to waive registration fees in the first year. Offering free registration would place a considerable burden on local councils at a time when resources are already overstretched. The implementation and ongoing management of the proposed scheme will require substantial investment in staff, training, IT systems, equipment, inspections and legal enforcement.

We urge DAERA to provide a detailed financial analysis to fully assess the likely volume of registrations and the associated costs. The registration fee must be set at a realistic level that ensures full cost recovery. This includes communications, administrative and enforcement staffing, IT infrastructure, transportation and equipment, as well as long-term service delivery.

Furthermore, Council recommends that registration fees be embedded in legislation and linked to inflation to ensure consistency across councils and sustainability over time. A sliding fee scale could be considered to reflect the number of animals being sold or transferred, but care must be taken not to set rates so high that it encourages illegal activity.

Q10. Do you agree that a person who sells, gives away, or otherwise transfers the ownership of puppies and kittens, should be required to do so at the address where the puppies and kittens, and the biological mother are kept?

Yes. Council supports the requirement that the sale, transfer or rehoming of a puppy or kitten must take place at the premises where the animal and its biological mother are kept. This requirement promotes responsible breeding and gives potential buyers confidence that the animal has come from a suitable environment.

However, appropriate safeguards must be in place to prevent individuals from presenting animals that are not actually the biological mother. Without proper verification, this requirement may be undermined in practice.

Q11. Do you agree with the conditions of registration, as listed in the consultation document?

Yes. Council agrees with the proposed registration conditions in principle and offers the following comments:

Condition 1 states that a registered person cannot sell, give away, or otherwise transfer ownership of puppies or kittens that were not bred at the registered address. Council supports this condition, as it would prevent individuals from operating as third-party sellers under the guise of being legitimate breeders. This measure would help ensure transparency and traceability in the sale or transfer of animals.

Condition 2 prohibits the transfer of puppies or kittens that are unweaned, weaned too early, or under 8 weeks old. Council fully supports this provision as it aligns with best animal welfare practices and reduces the risk of health and behavioural issues that can result from premature separation from the mother.

Condition 3 requires that any puppy or kitten must be shown to a prospective owner in the presence of its biological mother, with an exemption allowed only in cases where the mother has died. Council agrees with this condition, which promotes ethical breeding and reassures buyers that the animals have been raised in appropriate environments. However, we highlight the need for measures to verify that the female presented is indeed the biological mother, to prevent fraudulent practices.

Condition 4 mandates that the actual transfer of ownership must take place in person and at the registered premises, in the presence of both the puppy or kitten and its biological mother. Council supports this approach as it discourages impulsive or remote transactions and enhances buyer confidence by allowing them to observe the animal's early environment and maternal care.

Condition 5 requires that the new owner be provided with specific information on caring for the animal, including details of licensing obligations. Council supports this requirement but emphasises that DAERA should provide standardised information templates. This would ensure consistency across all sellers and remove the burden from individual breeders or rescue organisations to produce these materials themselves.

Condition 6 states that the registered person must keep and maintain a register of all dogs and cats, including puppies and kittens, on the premises. While Council supports the intent of this condition, we recommend that the term "register" be replaced with "record," as in many cases it may apply to a single litter. Furthermore, we suggest that there should be a requirement to maintain these records for a defined period after the transfer of ownership, so that they are available for inspection or compliance checks if needed.

In addition to the above, Council supports the introduction of a cap on the number of puppies or kittens that may be sold, transferred, or given away within a 12 month period. This would help distinguish between occasional and commercial activity, providing a clearer regulatory boundary.

Finally, we reiterate that the implementation of these conditions will create significant operational demands for councils, particularly around inspections to verify compliance. These duties cannot be absorbed within existing resources. Therefore, any proposed legislative framework must be accompanied by adequate funding and a strong public awareness campaign, to ensure both compliance and understanding of the new responsibilities among breeders, sellers, and the general public.

Proposed Conditions for Advertising Puppies and Kittens

Q12. Do you agree that any advertisement for the sale of, giving away of, or other transfer of ownership of a puppy or kitten must include the information, as listed in the consultation document?

Yes. Council supports the requirement for all advertisements to include the information outlined in the consultation. However, rather than a warning message, we recommend a factual, informative notice that sets out the responsibilities of pet ownership. This approach would be more constructive and less likely to deter responsible buyers. DAERA should provide a sample advertisement format to assist sellers in meeting the new requirements consistently.

Proposed Online Publication of Register of Sellers of Puppies and Kittens

Q13. Do you agree that an online, public register of sellers and suppliers of puppies and kittens should publish the detail, as listed in the consultation document?

Yes. Council agrees in principle with the proposal that an online public register should include all the information listed in the consultation document. We believe such a register could be beneficial for prospective buyers, as it would provide assurance that a seller or supplier is operating in compliance with the proposed regulations.

However, we have concerns about the potential data protection implications, particularly in relation to hobby or accidental breeders. The publication of personal home addresses raises issues under GDPR and could also pose risks to individuals' privacy and safety. While the disclosure of commercial premises is generally not an issue, private individuals may be less comfortable with their personal details being made public.

In addition, there may be unintended consequences if registration automatically results in a person's details being published online. Council suggests that an "opt-out" mechanism be considered, particularly for non-commercial breeders, or that publication of names and addresses be made voluntary in certain circumstances.

We also wish to highlight that, if inclusion on a public register is intended to provide assurance to buyers, then councils may be expected to carry out inspections to verify compliance before publication. This would, in effect, make inspections mandatory and would have significant implications for council resources and officer time. These additional responsibilities must be acknowledged and adequately funded by DAERA.

Impact Assessments

Q14. Do you have any comments to make in relation to the Regulatory Impact Assessment, and its conclusions, or any additional information regarding impacts/costs?

Yes. Council is of the view that the Department's suggested costs to councils, as outlined in the Regulatory Impact Assessment (RIA), do not accurately reflect the true financial and operational impact that the proposed legislation would have on local authorities. In our opinion, the cost projections are significantly underestimated and do not take into account the full range of additional duties that councils would be expected to carry out.

The RIA fails to acknowledge concerns previously raised by councils at the DAERA workshop on 20 February 2025, including those related to increased staff demands, administrative and enforcement burdens, and the expectation that councils would undertake

inspections and ensure ongoing compliance. These responsibilities will require new staff, training, communications, equipment and IT infrastructure to administer and enforce the scheme effectively, not just at the point of registration but throughout the lifecycle of each case.

Council is particularly concerned about the assumption that no inspection costs will be incurred in Northern Ireland, based on comparisons with fees set in England. This assumption is not accurate. Councils in Northern Ireland will inevitably need to carry out inspections in order to confirm that conditions are being met, particularly in relation to the presence of the biological mother, the condition of the premises, and compliance with recordkeeping and age restrictions. Without inspections, it will not be possible to ensure that the scheme is working as intended.

We also request that DAERA provides a revised financial model that takes into account the full range of expected costs, including communication materials, officer time, vehicle and equipment costs, legal enforcement, and the ongoing maintenance of a central register. Fees should be set in legislation and reviewed annually, with a requirement for fees to be index-linked to inflation, to ensure consistent and fair application across all councils.

Council maintains that the inclusion of "giving away" puppies or kittens within the registration requirement may result in criminalising individuals who are simply trying to rehome their pet's offspring to a friend or neighbour. While we recognise that this provision may help prevent loopholes and deter unscrupulous breeders from bypassing the law, it needs to be carefully balanced to avoid unintended consequences for responsible pet owners.

Finally, we recommend that the RIA consider the confusion that may arise due to the differing requirements in the Republic of Ireland, where individuals or premises that sell 6 or more animals per calendar year are required to register. These discrepancies should be addressed to minimise cross-border enforcement challenges and ensure consistent messaging to the public.

Q15. Do you have any comments to make in relation to the Rural Needs Impact Assessment, and its conclusions?

Yes. Council welcomes the opportunity to comment on the Rural Needs Impact Assessment and its conclusions. From the perspective of animal welfare and rural community life, it is important to highlight the significant role that kittens and pups play in the social fabric and emotional wellbeing of rural residents.

Pets, particularly young animals like kittens and puppies, are not only beloved companions but also contribute to reducing rural isolation and supporting mental health. In many rural areas, where access to social infrastructure may be limited, these animals offer companionship to elderly residents, families and children, fostering a sense of care and routine.

Moreover, responsible breeding and rehoming practices for kittens and pups are often supported by small rural businesses and community networks. Therefore, policies that impact veterinary services, transport, licensing, or animal welfare directly influence rural pet ownership and the local economy.

We encourage the assessment to give further consideration to the indirect but meaningful impact of any proposals on rural households that care for animals, particularly young pets. Ensuring accessible, affordable, and well-regulated services for pet owners is a rural need that should not be overlooked.

Q16. Do you have any comments to make in relation to the Equality and Disability Screening, and its conclusions?

Yes. Council does not agree with the consultation's assertion that councils are responsible for enforcing the 2011 Act with regard to the sale of puppies and kittens.

Councils enforce certain provisions related to animal welfare, but they do not currently regulate the sale or transfer of puppies. In practice, this role is typically carried out by enforcement officers under different statutory provisions.

It is important that this misunderstanding is corrected in the Equality and Disability Screening document so that roles and responsibilities are accurately reflected.