Consultation on Proposed Animal Welfare Policy Reforms in Northern Ireland
Written Response Template

About you

Q1. What is your name?

Sue Nelson

Q2. What is your email address?

sue@instituteoflicensing.org

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

☐ Personal

√Organisation

If the views and opinions expressed are on behalf of an organisation, please provide the name of the organisation below.

The Institute of Licensing

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

√ Yes

☐ No

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

☐ No

☐ Not Applicable

POLICY PROPOSALS

The consultation seeks views on proposed changes across four key policy areas:

- the regulation of rescue and rehoming organisations;
- an inflationary increase in dog licence fees;
- a ban on specific aversive training devices; and
- strengthened microchipping requirements for dogs.

In addition, the consultation includes a call for evidence on the mandatory microchipping of pet cats.

Full details of the proposals and the relevant consultation questions are set out in the consultation document.

Respondents may choose to comment on any or all of the policy areas outlined above.

REGULATION OF RESCUE AND REHOMING ORGANISATIONS

Q6. Do you agree that all rescue and rehoming organisations that rehome more than five animals annually should be inspected and licensed?

√ Yes

☐ No

Comments

The Institute of Licensing fully supports proposals to bring rescue and rehoming organisations into scope for licensing purposes. This is an area which is now regulated in Scotland, DEFRA has committed to consulting on arrangements in England, and in Wales, the Animal Welfare Plan includes a commitment to consult on revised proposals for the licensing of activities involving animals, potentially including animal welfare establishments (including sanctuaries and rescue/ rehoming centres).

Rescue and rehoming services provide day-to-day care, boarding animals awaiting rehoming. This service is very similar to animal boarding.

Many bitches are rescued whist pregnant and there needs to be an appropriate level of competence of care and accommodation for bitches and puppies similar to that required in the licensing of breeding dogs.

Some of these animals can remain in the centres for long periods of time. It is imperative they are cared for by appropriately competent persons who have the skills and experience to provide the appropriate level of care. It is important that there are minimum standards for accommodation, enrichment and care provided.

Under **The Animal Welfare (Licensing of Activities Involving Animals) (Scotland) Regulations 2021**, any persons or organisations operating animal welfare establishments (such as animal sanctuaries or animal rehoming centres) where 8 animals (excluding fish) or 5 dogs or 5 equines are kept at the same time by the operator of the animal welfare establishment must be licensed.

Consideration should also be given to including cats within the '5 or more' threshold. In other words, rehoming 5 or more dogs or cats, or caring for 8 or more animals or 5 or more dogs or cats.

Responsibility for the Licensing Function

In most areas of licensing across the UK, public regulatory licensing sits with local councils as the licensing authority, but this is not the case for animal licensing in Northern Ireland, where responsibility for the majority of animal licensing (**boarding establishments**, pet shops and zoos), remains with DAERA.

Under the circumstances, our local authority members in Northern Ireland contend that the prosed regulation of rescue and rehoming centres more closely aligns with DAERA's current

licensing functions. This could easily be implemented within the existing frameworks either by authorisation under existing legislation and/or allocation of legislative powers to DAERA and setting up a centralised licensing team of all animal related establishments.

This alignment would:

- Promote consistency and clarity for operators and the public;
- Allow use of existing processes and expertise;
- Reduce administrative burden; and
- Improve enforceability.

Without this alignment, there is a risk of inconsistency and inefficiency.

As a result, we understand that local authorities in Northern Ireland **are not in favour** of district councils in Northern Ireland becoming the enforcing authority.

Q7. Do you agree that all rescue and rehoming organisations that care for eight or more animals (or five or more dogs) should be inspected and licensed?

√ Yes

☐ No

Comments

Consideration should also be given to including cats within the '5 or more' threshold. In other words, rehoming 5 or more dogs or cats, or caring for 8 or more animals or 5 or more dogs or cats. This would ensure that the same minimum standards of welfare are included for the care of rescued cats.

Q8. Do you agree with the proposed licence conditions, as listed in the consultation document?

√ Yes

☐ No

Comments

The proposed conditions overall appear appropriate. However, we have suggested some amendments as set out below (shown highlighted or crossed out):

General

- The licence must always be clearly displayed at the premises. If the licence-holder has a

website, the site must clearly show the licence-holder's name, licence number, and the issuing licensing authority.

- The licence-holder must maintain all required records in a form that inspectors can readily view; if stored electronically they must be legible and accessible.
- The organisation must receive a visit by a veterinarian at least once a year, for the purpose of advising the operator on animal welfare.
- The organisation must keep appropriate records, as specified, for a period of five years.

Animal Numbers

- The total number of animals kept at any time must not exceed the maximum that is reasonable taking into account the facilities and numbers of employed staff and volunteers on the premises.

Staffing

- ~~There must be a sufficient number of competent staff or volunteers.~~ The licence holder must ensure that they employ sufficient numbers of competent staff or volunteers.
- Staff and volunteers must be trained in the care of the range of animals that are rescued, and must be able to recognise normal behaviour for the species in their care, and to identify signs of disease, distress, injury or abnormal behaviour.
- ~~Volunteers may only carry out tasks for which they have been trained.~~ A written training policy for all staff and volunteers must be in place and written records of the training must be maintained.

Environment / Establishment

- The licence holder ~~An establishment~~ must provide an environment which is suitable for the species kept and their condition, so that they can express their natural behaviours, have access to water, light and ventilation as needed. (An establishment cannot do this. It has to be a person).
- Animals must be kept in housing that minimises stress, including stress from other animals or the public. If members of public can view or contact animals, appropriate signage must discourage disturbance.
- Dangerous wild animals (if held) must be kept in secure, lockable housing suitable to the species.
- ~~Establishments must be kept clean and disinfected to prevent diseases.~~ The licence holder must maintain a procedure to keep the establishment appropriately clean and disinfected to prevent spread of disease and to maintain suitable hygiene.
- ~~Establishments should have~~ The licence holder should (must) provide appropriate, self-contained isolation facilities for the care of sick, injured or potentially infectious animals.

Suitable Diet

- Feed preparation must be carried out in a suitable and clean room or area with hot and cold running water and soap and hand drying facilities.
- Feed and water containers must be cleanable or disposable.
- All food must be stored according to the manufacturer's instructions with refrigeration and freezing facilities available where necessary.

- Feeding must be appropriate to the species (quality, quantity, frequency), water must be fresh and clean.
- Food preparation rooms must be kept vermin free.
- ~~; feed preparation (if done on-site) must be hygienic.~~

Enrichment / Handling / Protection from suffering, injury and disease

- Active and effective environmental enrichment must be provided to the animals in both inside and outside environments.
- Animals must not be left unattended in conditions that are likely to cause distress.
- Resources (space, food, water, shelter) must be provided so as to minimise competition or dominance.

Rehoming

- The licence-holder must keep a register covering all animals held at the establishment.
- For animals kept in groups (where individual tracking isn't practicable, e.g. some small mammals), group-level records are acceptable.
- For rehoming animals such as dogs, cats or horses, adverts must include a photo and, where known, the animal's age. The licence number and issuing authority must be
- recorded.
- When animals are offered for rehoming/supply, the adopter must be provided with
- information about care, husbandry, and veterinary care; a suitably trained person must be available to provide advice; and the prospective new keeper must be given known details of the animal (age, sex, vet history).

Wild Animals

- Where a wildlife rescue is to be released, this may only be done if the release area is
- suitable for the species; and the animal is capable of feeding and surviving independently.

Impact Assessments

Q9. Do you have any comments to make in relation to the Regulatory Impact Assessment for the Regulation of Rescue and Rehoming Organisations, and its conclusions, or any additional information regarding impacts/costs?

√ Yes

☐ No

Comments

While there is currently no licensing requirement for rescue and rehoming centres in England and Wales, it is hoped that this will progress in future.

In England, the government has published its Animal Welfare Strategy for England which includes

commitments to

- launch a consultation on licensing domestic rescue and rehoming organisations
- develop the evidence base on welfare issues associated with international rescue and rehoming

The Welsh Government has held public consultations regarding licensing and maintains a Code of Best Practice for Animal Welfare Establishments. A formal, mandatory licensing system is not yet in force, but the Welsh Government has committed to prioritising proposals to regulate animal welfare establishments, including rescues, sanctuaries, rehabilitation centres and rehoming organisations.

Licensing regimes must be effectively resourced through licence fees. New burdens funding should also be considered to ensure that local councils can fully resource the regime including staffing, systems and processes required.

We support the overarching policy aims to protect and promote animal welfare standards across the rescue and rehoming sector, providing transparency, accountability, and traceability within organisations operating within Northern Ireland.

Q10. Do you have any comments to make in relation to the Rural Needs Impact Assessment or the Equality and Disability Screening for the Regulation of Rescue and Rehoming Organisations, and their conclusions?

☐ Yes

√ No

Comments

DOG LICENCE FEES

Q11. Do you agree with the proposed inflationary increase across all categories of dog licence fees as set out in the consultation document?

√ Yes

☐ No

Comments

Licensing regimes should be self-funding where possible. As set out in the consultation, the

proposed fees remain minimal compared with the costs of dog ownership. It might be argued that any increase in fees could increase the number of unlicensed dogs, but this should be low risk given the level of fees proposed which are in line with inflation increases since 2011.

Our local authority members have highlighted that the majority of licences are concessionary or free, limiting the ability for councils to close significant funding gaps. They point out that it is inevitable that costs will continue to rise and their capability to improve enforcement, achieve greater dog control compliance and public safety outcomes will be limited based on this modest increase.

Static licence fees are a source of frustration across the UK where there is no regular review. An automatic annual index-linked inflationary increase should be incorporated within the proposed legislative amendment to enable more flexibility for future annual fee reviews and increases.

The Institute has previously highlighted the resource difficulties and disappointment as a result of the introduction of the XL Bully legislation by DAERA with no additional funding for ongoing costs.

Regarding other Fees

If the decision is that district councils must take responsibility for the licensing of rescue and rehoming centres, there is significant concern that licence fees may not fully offset district councils' administrative and inspection costs, especially in areas with many or complex rescue and rehoming operations. Councils could, or more likely would, be left with shortfall in income which could place additional strain on council budgets and resources potentially affecting the quality and frequency of inspections and enforcement.

We understand that there were previously agreed positions between councils and DAERA during the consultation and implementation phase leading up to the implementation of the Welfare of Animals Act (NI) 2011 which did not include adding additional responsibilities upon councils in the future. The Animal Welfare Service is operating in a financially constrained environment, following the withdrawal of the annual funding by DAERA in August 2023.

Impact Assessments

Q12. Do you have any comments to make in relation to the Regulatory Impact Assessment for the proposed increase in Dog Licence Fees, including its conclusions, or any additional information regarding impacts/costs?

√ Yes

☐ No

Comments

We support this inflationary increase to Dog Licence Fees and would recommend that fees are reviewed annually to ensure they remain at an appropriate level to cover the costs of the licensing regime. The proposed increases represent a minor cost when compared with the overall costs of keeping dogs.

Q13. Do you have any comments to make in relation to the Rural Needs Impact Assessment or the Equality and Disability Screening for the proposed increase in Dog Licence Fees, and their conclusions?

☐ Yes

√ No

Comments

BAN ON SPECIFIC AVERSIVE TRAINING DEVICES

Q14. Do you agree that the use of handheld remote controlled electric shock collars (e-collars) on dogs and cats should be banned?

√ Yes

☐ No

Comments

The British Veterinary Association states on its website that 'Research has shown that the application of an electric shock to dogs or cats, even at a low level, can cause physiological and behavioural responses associated with stress, pain, and fear.' The use of any device that inflicts pain and suffering on an animal must be prohibited. Good trainers do not use these products, and almost all dogs respond to reward-based training. We cannot see any justification for pain and suffering to be deliberately inflicted on a sentient animal. In Wales, the use of such e-collars was banned in 2010 via regulations introduced under the Animal Welfare Act 2006, while in England, the government introduced the Animal Welfare (Electronic Collars) (England) Regulations 2023 with plans for a full ban. It was approved by the

House of Lords but has not yet cleared the House of Commons.

Q15. Do you agree that the use of choke collars on dogs and cats should be banned?

√ Yes

☐ No

Comments

If these are not used correctly, they can inflict pain and harm. There are other collars available that will not inflict harm.

Q16. Do you agree that the use of prong collars on dogs and cats should be banned?

√ Yes

☐ No

Comments

Prong collars are designed to cause pain or discomfort to the animal to reduce or stop them from pulling on their lead.

They're based on the principle of applying something painful or frightening to stop unwanted behaviour. When a dog pulls on the lead, the metal prongs of the collar close and prong the sensitive skin around the neck. The prongs cause pain as well as potential injury and infection from puncture wounds and nerve damage.

Research has shown that aversive training techniques, like prong collars, can cause pain and distress and can compromise dog welfare. Painful and distressing training techniques have long term effects on the mental wellbeing and overall happiness of dogs.

As with shock and choke collars, we contend that there is no justification for their use.

Impact Assessments

Q17. Do you have any comments to make in relation to the Regulatory Impact Assessment for the proposed Ban on Specific Aversive Training Devices, including its conclusions, or any additional information regarding impacts/costs?

√ Yes

☐ No

Comments

We can see no adverse impacts in banning the use of aversive training devices. Keeping Northern Ireland in line with other UK regions, Republic of Ireland and EU Member States is proportionate.

Q18. Do you have any comments to make in relation to the Rural Needs Impact Assessment or the Equality and Disability Screening for the proposed Ban on Specific Aversive Training Devices, and their conclusions?

☐ Yes

√ No

Comments

STRENGTHENING MICROCHIPPING REQUIREMENTS FOR DOGS

Q19. Do you agree that owners should be required to update any changes onto the relevant microchip databases within a specified time, such as 14 days?

√ Yes

☐ No

Comments

This strengthens accountability. If there is no time limit then the requirement will be less effective.

√ Yes

☐ No

Comments

This will help provide an audit trail on the origins of the dogs/puppies and their ongoing ownership.

Q21. Do you agree that all dogs should be microchipped before they are older than eight weeks?

√Yes

☐ No

Comments

There should be provision for mitigating circumstances such as illness or similar preventing microchipping by that date.

Impact Assessments

Q22. Do you have any comments to make in relation to the Regulatory Impact Assessment for Strengthening Microchipping Requirements for dogs, including its conclusions, or any additional information regarding impacts/costs?

☐Yes

√ No

Comments

Q23. Do you have any comments to make in relation to the Rural Needs Impact Assessment or the Equality and Disability Screening for Strengthening Microchipping Requirements for dogs, and their conclusions?

☐Yes

√ No

Comments

CALL FOR EVIDENCE ON MICROCHIPPING OF CATS

Q24. Do you keep, or own, one or more cats?

☐ Yes

☐ No

If Yes, please answer Q25 below.

Q25. Is your cat microchipped?

☐ I have one cat, it is microchipped.

☐ I have one cat; it is not microchipped.

☐ I have more than one cat, none are microchipped.

☐ I have more than one cat, some are microchipped.

☐ I have more than one cat, all are microchipped.

Q26. What benefits, if any, do you think the microchipping of pet cats could bring?
Please provide any evidence, data or examples to support your views.

Cats are notorious for wandering off. Many end up hurt or killed through car collisions or other mishaps, and the more expensive breeds are the target of theft.

Microchipping cats provides a permanent, safe method of identification that significantly increases the chances of being reunited with a lost or stolen pet. It also proves legal ownership and enables access to modern, microchip-activated home technology.

It helps charities and local authorities distinguish between true strays and feral cats or notify owners quickly in the tragic event that a cat is killed on the road.

It is a legal requirement in England for all pet cats to be microchipped before they reach the age of 20 weeks. Failing to do so or failing to keep contact details updated on an approved database can result in a fine of up to £500.

Q27. What challenges, if any, do you think the microchipping of pet cats could bring?
Please provide any evidence, data or examples to support your views.

Because cats are independent and roam freely, it is difficult for local authorities and enforcement bodies to verify compliance or identify stray unchipped cats compared to dogs.

In addition, the number and differing standards of the microchipping companies and systems make this more complicated, and there is the added factor that some companies may be reluctant to disclose data. In England and Wales, there are over 20 government-compliant pet microchip databases operating concurrently. While there is no single central portal, databases are interconnected or linked through search platforms.

Having said that, a report by Battersea Dogs Home in 2023 found that Local Authorities in England have very little contact with stray cats which are difficult to identify given that cats roam in a way dogs do not. Of the 34 Local Authorities surveyed, 94% had no contact with any stray cats in March 2023.

In April 2019, Battersea asked 369 Local Authorities in Great Britain with responsibility for dog control about how they enforced compulsory microchipping. This revealed that Local Authorities in Great Britain only issued 21-day enforcement notices in an estimated 13% of potential cases, with fines ranging from £20 to £500. Battersea has made several recommendations to DEFRA including:

- Giving Local Authorities **sufficient resource** and **a legal duty to enforce** the Regulations.
- Produce **best practice guidance for Local Authorities**, drawing on the experience of those councils that are making extensive use of their enforcement powers.
- Give Local Authorities the power to issue a conditional Fixed Penalty Notice for non-compliance.

In April 2022, the Animal (Penalty Notices) Act 2022 was passed, which provides a vehicle to allow Local Authorities in England and Wales to issue Fixed Penalty Notices (FPNs) for failing to microchip a dog or cat. Secondary legislation will be required to enable this.

Q28. What do you think might present a barrier for cat owners to microchip their pet cats? Please provide any evidence, data or examples to support your views.

Awareness will be a key consideration. Owners must be informed through public awareness campaigns, and through veterinary services of the new requirements and the risks / sanctions for non-compliance.

Some owners may consider that their cats are 'home cats' and that microchipping is unnecessary for them, and some may face financial hardships which render even the modest fee for microchipping to be a barrier.

Others may be concerned at causing pain to their pets through the process of inserting the

microchip.

Q29. Are there any other challenges that should be considered, in relation to mandatory microchipping of pet cats?
Please provide any evidence, data or examples to support your views.

It would be beneficial for a single unified database if possible.

In addition, local authorities are under enormous financial pressure currently. Enforcing mandatory microchipping of cats will present an additional burden, and resourcing this should be a priority consideration.

Q30. Are there any other challenges, including for any other type of cats, which should be considered?
Please provide any evidence, data or examples to support your views.

In England, the legal age limit for microchipping cats is 20 weeks, whereas it is 8 weeks for dogs. This discrepancy exists because cats grow and develop differently than dogs, making it safer to chip them at an older age.

The later deadline for cats is primarily due to their smaller size and physical development with kittens being significantly smaller than most puppies at 8 weeks. Chipping them too early is likely to be technically difficult and potentially more uncomfortable, whereas a 20-week deadline will allow owners to tie it in with routine neutering procedures (recommended at around 4 months) and can be done at the same time, while under general anesthetic.

Q31. Is there anything else you would like DAERA to consider on this issue?
Please provide any evidence, data or examples to support your views.

Microchipping any small animal should only legally be carried out by a vet. Just because someone has a microchipping certificate this does not ensure their ongoing competence.

Written responses should be sent to:
E-mail: animalwelfarepolicy@daera-ni.gov.uk
Postal address: Animal Welfare and Dog Control Policy Branch Department of Agriculture, Environment and Rural Affairs (DAERA) Jubilee House
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Closing Date for Responses is Tuesday 30 June 2026.