

| Title: Provision of additional animal welfare protections to Northern Ireland's puppies and kittens which are intended to be sold, given away, or otherwise transferred to new owners. | Regulatory Impact Assessment (RIA) | |
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| | Date: 15 May 2025 | |
| | Type of measure: Secondary Legislation | |
| Lead department or agency: Department of Agriculture, Environment and Rural Affairs (DAERA/the Department) | Stage: Initial | |
| | Source of intervention: Domestic NI | |
| Other departments or agencies: N/A | Contact details: Animal Welfare and Dog Control Policy Branch | |
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Summary Intervention and Options

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| <p>What is the problem under consideration? Why is government intervention necessary? (7 lines maximum)</p> <p>The third-party sale of puppies and kittens (under six months of age) poses several significant problems including; poor animal welfare; increased risk of illness and disease; poor social and environmental skills due to a lack of socialisation; customer deception; encouraging irresponsible breeding (focus on profit rather than welfare of the puppy or kitten) as well as ethical concerns. Despite frequent and high-profile education and information campaigns on sourcing from a reputable breeder, people continue to unwittingly purchase puppies from rogue breeders and from sellers who did not breed the animal themselves. Some purchasers do not really know where their new pet came from, and in terms of the animals themselves, young animals sold in this way go on to suffer welfare issues, the effects of which continue for the rest of their lives. Unlike the rest of the UK, sales of puppies and kittens in Northern Ireland are largely unregulated. This intervention is necessary to afford these animals additional animal welfare protections, leading to better outcomes for both the animals and their new owners.</p> |
| <p>What are the policy objectives and the intended effects? (7 lines maximum)</p> <p>Objectives of registration of those who sell, give away, or otherwise transfer ownership of puppies and kittens:</p> <ul style="list-style-type: none"> • the end of third-party sales of puppies and kittens; • the establishment of conditions which will promote improved welfare of puppies and kittens; • greater transparency and accountability; and • improved traceability. <p>The intended effect is to ensure that anyone who wishes to sell, give away, or otherwise transfer the ownership of puppies and kittens must register with their council, and will see their details published on a public register.</p> |

What policy options have been considered, including any alternatives to regulation? Please justify preferred option (further details in Evidence Base) (10 lines maximum)

Scoping of options

In total 9 options were considered, and these fell into 4 categories: do nothing; introduce a registration system; introduce a licensing system; and introduce a ban on third-party sales.

(NB, sales/sell/selling includes sales, giving away, or otherwise transferring ownership of puppies and kittens).

1. do nothing;
2. amend current pet shops legislation. Require hobby breeders, which are dog breeders who do not fall into the definition of a 'breeding establishment' (which is set out in current dog breeding establishments (DBEs) legislation, and which are licenced by their local council), and cat breeders (which are currently unregulated) to obtain a petshop licence, and specify all petshop licence holders are to meet new conditions IRO sales of puppies and kittens;
3. amend current dog breeding establishments (DBE) legislation. Require dog breeders who do not fall into the definition of a dog 'breeding establishment', and cat breeders, to obtain a breeding establishment licence, Specify licence holders to meet conditions IRO sales of puppies and kittens;
4. introduce new legislation to require all persons who sell, give away, or otherwise transfer ownership of puppies and kittens to obtain a 'sellers licence';
5. introduce new legislation setting out rules for all sales of puppies and kittens, which would apply to all licensed DBEs, pet shops, and also to hobby breeders and cat breeders. This would not involve a licensing or registration system;
6. introduce new legislation to require DBEs licence holders to meet new conditions regarding sales, and which would require unregulated 'hobby' breeders, and cat breeders, to register with councils;
7. introduce new legislation to regulate all animal activities, commencing with sales of puppies and kittens;
8. make new legislation to require anyone who sells a puppy or kitten, to prove that they keep the mother;
9. make new legislation to require anyone who sells a puppy to prove that they keep the puppy's mother, and introduce a cat seller's licence.

Based on matters including clarity for sellers/suppliers of puppies and kittens; enforceability; and level of burden; the preferred option was initially identified as option 4: introduce new legislation to require all persons who sell, give away, or otherwise transfer ownership of puppies and kittens to obtain a licence from their local council. Following engagement with councils, and giving cognisance to the enforcement burden, the final option was then identified as introduce new legislation to require all persons who sell, give away, or otherwise transfer ownership of puppies and kittens to apply to their local council to be registered, and the council register to be made public.

Selection of preferred options

Option 1 (Do nothing) – this option involves no change to the current arrangements, and to continue to allow the sale of puppies and kittens in Northern Ireland to go unregulated.

Option 2 – (Preferred option) – this option involves making legislation to introduce a registration scheme, which will mean that anyone who intends to sell, give away, or otherwise transfer the ownership of puppies and kittens in Northern Ireland must apply to be entered onto their local council's Register of Sellers and Suppliers of Puppies and Kittens, pay a fee to be so registered, have their details published, and be required to comply with specified conditions. Registration will be valid for one year, and the registered address will be the only one from which the seller/supplier will be able to sell/supply puppies and kittens from. In addition, in terms of puppies, the registered address must be the same as the address quoted on the yearly dog licence pertaining to the puppies' mother. Councils will have powers to set the registration fee in their districts, as well as powers of enforcement. It is proposed that councils will be empowered to set the appropriate fee based on full cost recovery. This will allow councils to have greater flexibility and responsiveness to local needs and economic conditions. As the new registration system beds in, and enforcement costs become more apparent, councils can adjust fees to reflect the actual costs of providing these services, ensuring that they are adequately funded and sustainable. It is considered that councils might collectively decide to set fees which would be standard for everyone across Northern Ireland or, alternatively, they might each decide to set their own individual fees. The effect of this might be that there could be differing fees across Northern Ireland council districts as each council determines what the fee should be in order to deliver the service in its district. However, it is expected that the cost of delivering the service will be similar across the councils, and therefore the fees will not differ widely.

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|---|---|
| Will the policy be reviewed? It will be reviewed | If applicable, set review date: This will be reviewed on an ongoing basis by the Department. |
|---|---|

| Cost of Preferred (or more likely) Option | | |
|--|---|---|
| Total outlay cost for business £m | Total net cost to business per year £m | Annual cost for implementation by Regulator £m |
| 0 | | 0 |

| | | |
|--|--|---|
| Does Implementation go beyond minimum EU requirements? | YES <input type="checkbox"/> | NO <input type="checkbox"/> |
| Is this measure likely to impact on trade and investment? | YES <input checked="" type="checkbox"/> | NO <input type="checkbox"/> |
| Are any of these organisations in scope? | Micro Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> | Small Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |
| | Medium Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> | Large Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |

The final RIA supporting legislation must be attached to the Explanatory Memorandum and published with it.

Approved by: Date:

ECONOMIC ASSESSMENT (Option 1: Do nothing)

| Costs (£m) | Total Transitional (Policy) | Average Annual (recurring) | Total Cost |
|---------------|-----------------------------|---------------------------------------|-----------------|
| | (constant price) Years | (excl. transitional) (constant price) | (Present Value) |
| Low | 0Optional | 0Optional | 0Optional |
| High | 0Optional | 0Optional | 0Optional |
| Best Estimate | No transitional costs | No average annual recurring costs | No total costs |

Description and scale of key monetised costs by 'main affected groups' Maximum 5 lines

There would be no monetised costs for this option. People who sell, give away, or otherwise transfer the ownership of puppies and kittens would experience no change to how they currently operate. Those who purchase/obtain puppies and kittens would also experience no change. There would be no additional role for councils.

Other key non-monetised costs by 'main affected groups' Maximum 5 lines

There would be no non-monetised costs for this option. People who purchase/obtain puppies and kittens would experience no change and remain susceptible to rough breeders and sellers. There would be no additional role for councils.

| Benefits (£m) | Total Transitional (Policy) | Average Annual (recurring) | Total Benefit |
|---------------|--------------------------------|---------------------------------------|-----------------|
| | (constant price) Years | (excl. transitional) (constant price) | (Present Value) |
| Low | 0Optional | 0Optional | 0Optional |
| High | 0Optional | 0Optional | 0Optional |
| Best Estimate | No benefits as no action taken | | 0 |

Description and scale of key monetised benefits by 'main affected groups' Maximum 5 lines

Monetised benefits to this approach cannot be quantified. People who sell, give away, or otherwise transfer the ownership of puppies and kittens would experience no change to how they currently operate and would be able to continue to make profit from the unregulated activities. Those who purchase/obtain puppies and kittens would also experience no change. There would be no additional role for councils.

Other key non-monetised benefits by 'main affected groups' Maximum 5 lines

Non-monetised benefits to this approach cannot be quantified. People who sell, give away, or otherwise transfer the ownership of puppies and kittens would experience no change to how they currently operate and would be able to continue to avoid time spent meeting administrative requirements. Those who purchase/obtain puppies and kittens would also experience no change, and would not be reminded to purchase/obtain animals responsibly. There would be no additional role for councils.

Key Assumptions, Sensitivities, Risks Maximum 5 lines

Assume no impact on council enforcement action, as there are no changes requiring additional activities. This remains a topical issue and it attracts significant interest on a regular basis. There is therefore a risk of reputational damage to the Department, if it does not take action in this area.

BUSINESS ASSESSMENT (Option 1: Do nothing)

| Direct Impact on business (Equivalent Annual) £m | | |
|--|------------|-------|
| Costs:0 | Benefits:0 | Net:0 |

Cross Border Issues (Option 1: Do nothing)**How does this option compare to other UK regions and to other EU Member States (particularly Republic of Ireland)** Maximum 3 lines

The other devolved administrations (England, Scotland, and Wales) have licensing systems for those who sell animals as pets, as part of a business, and they ban third-party sales of puppies and kittens. The Republic of Ireland has a registration system for people (and premises) who sell 6 or more pet animals in a calendar year. This is managed by Department of Agriculture, Food and the Marine and the register is published.

Summary: Analysis and Evidence

Policy Option 2

Description: Preferred Option: **Introduction of registration of sellers and suppliers of puppies and kittens.**

(I.e. make legislation to introduce a registration scheme, which will mean that anyone who intends to sell, give away, or otherwise transfer the ownership of puppies and kittens in Northern Ireland must apply to be entered onto their local council's Register of Sellers and Suppliers of Puppies and Kittens, pay a fee to be so registered, have their details published, and be required to comply with specified conditions. Registration will be valid for one year. Councils will have powers to set fees, as well as powers of enforcement.)

ECONOMIC ASSESSMENT (Option 2: Preferred Option Introduction of a registration of sellers and suppliers of puppies and kittens)

| Costs (£m) | Total Transitional (Policy) | | Average Annual (recurring) | Total Cost |
|----------------------|-----------------------------|-------|---------------------------------------|----------------------------|
| | (constant price) | Years | (excl. transitional) (constant price) | (Present Value) |
| Low | Optional | | £261,589 Optional | £261,589 Optional |
| High | Optional | | £2,467,174 Optional | £2,467,174 Optional |
| Best Estimate | 16,000 | | £629,186.50 | £645,186.50 |

Description and scale of key monetised costs by 'main affected groups' Maximum 5 lines

Main affected groups are those who sell, give away, or otherwise transfer ownership of puppies and kittens. Depending on how councils set the yearly fee, it is considered that, potentially:

- 36,513 sellers/suppliers of puppies and 12,500 sellers/suppliers of kittens could be required to pay £50 (£2,450,650); £5 (£245,065); £12.50 (£612,662.50); or nil. The fee would be zero, in their first year of registration as a seller/supplier of puppies and kittens.
- 57 pet shops, and 45 dog breeding establishments¹ could be required to pay £162. (£16,524). This fee would be applicable from the first year.

If HMRC use the public council register of sellers and suppliers of puppies and kittens as an information source, illegal suppliers could face tax bills of £1,850,000.

The consultation will welcome evidence on costs.

¹ [Layout 1](#)

Other key non-monetised costs by 'main affected groups' Maximum 5 lines

Persons who sell, give away, or otherwise transfer the ownership of puppies and kittens will have an administrative burden as they will be required to register with their council, and they must thereafter keep records of all animals.

Businesses will have a similar burden, but as they are already required to obtain a licence for their business, and keep records, this burden will not be novel.

Councils will be required to maintain a public-facing register, and appropriately trained staff.

| Benefits (£m) | Total Transitional (Policy) | | Average Annual (recurring) (excl. transitional) (constant price) | Total Benefit (Present Value) |
|----------------------|-----------------------------|-------|---|----------------------------------|
| | (constant price) | Years | | |
| Low | £0 Optional | | £1,350,000 Optional | £1,350,000 Optional |
| High | £0 Optional | | £4,500,000 Optional | £4,500,000 Optional |
| Best Estimate | £0 | | £1,377,000 | £1,377,000 |

Description and scale of key monetised benefits by 'main affected groups' Maximum 5 lines

Cannot accurately be quantified. Potential purchasers who are able to avoid inadvertently obtaining sick puppies or kittens, could potentially save vet fees of £1,500 to £5,000 per person, per animal. Using the figure above, of 900 puppy buyers, this would equate to a range of from £1,350,000 to £4,500,000 across Northern Ireland.

Other key non-monetised benefits by 'main affected groups' Maximum 5 lines

Businesses and citizens entered onto the new Register of Sellers and Suppliers of Puppies and Kittens will have the tools (i.e. their registration) to demonstrate to potential purchasers that they are a responsible breeder and seller, who puts the welfare of their animals at priority level. Purchasers will benefit from obtaining a puppy or kitten that has enjoyed a good start to life.

Key Assumptions, Sensitivities, Risks Maximum 5 lines

It is considered likely that there will be a cost for councils in securing either a new IT system, or enhancements to their current dog licensing systems that would facilitate collection and storage of the new registration system data, and the creation of a public-facing Register of Sellers and Suppliers of Puppies and Kittens. It is assumed that councils might decide to operate on a single NI-wide basis, or on an individual council basis, in terms of fee setting. There is a risk that operating on an individual council basis will mean varied fees across NI, but it is assumed that there will be a broadly similar approach.

BUSINESS ASSESSMENT (Option 2: Preferred Option Introduction of a registration of sellers and suppliers of puppies and kittens)

| Direct Impact on business (Equivalent Annual) £m | | | | |
|--|------------------------|-----------------------|--|--|
| Costs:£0.64518650 | Benefits:£1.377 | Net:£0.7318135 | | |

Cross Border Issues (Option 2: Preferred Option Introduction of a registration of sellers and suppliers of puppies and kittens)**How does this option compare to other UK regions and to other EU Member States (particularly Republic of Ireland)** Maximum 3 lines

The other devolved administrations (England, Scotland, and Wales) have a licensing system for those who sell puppies and kittens as part of a business, and a ban on third-party sales. The Republic of Ireland (ROI) has a registration system for those who sell 6 or more pet animals in a calendar year, and their premises. This is managed by the Department of Agriculture, Food and the Marine and the register is published.

Evidence Base

Problem under consideration, and rationale for intervention

Third-party sales are sales made by a person who did not breed the puppies or kittens him/herself, but rather obtained them from someone else for the purpose of selling onwards. The Department has received calls for a ban on third-party sales of puppies and kittens, similar to the one introduced in England, since 2021.

The Department explored whether current legislation made provision about sales of puppies and kittens.

- *Dog Control:* The Dogs (Northern Ireland) Order 1983 makes it an offence to own an unlicensed dog. It is also an offence for a person to give or sell a dog to another person who has not first obtained a yearly licence for the dog, and it is an offence for a person to obtain a dog without having first acquired a licence for that dog. The penalty for each of these offences is a fine of up to £1,000. The Department noted that council dog summary statistics, provided by councils and collated and published on the DAERA website, indicated that as at March 2024 there are 139,674 licensed dogs in NI. The Department also noted that the Pets Dispensary for Sick Animals PAW Report 2024, from a sample of 2,371 owners, indicated that 33% obtained their dog from breeders; 25% from private sellers; 17% from rescue and rehoming centres; and 16% from a friend, family, or neighbour.
- *Dog Breeding Establishments:* The Welfare of Animals (Dog Breeding Establishments and Miscellaneous Amendments) Regulations (Northern Ireland) 2013 protects the welfare of all dogs and pups in commercial breeding establishments and requires the establishments to be licensed by local councils. A licence is needed if a person keeps three or more breeding bitches; and also, either breeds, advertises for sale, or supplies three or more litters of puppies (in any 12-month period); or advertises a business of breeding or selling of puppies. Licences have conditions attached, some of which relate to change of ownership requirements. It is an offence to operate a dog breeding establishment without a licence. It is also an offence to contravene any condition of a licence to keep a dog breeding establishment. The penalty for these offences is a fine not exceeding £5,000 and/or imprisonment for a period of up to six months.
- *Pet shops:* The Welfare of Animals Act (Northern Ireland) 1972 provides for licensing, by the Department, of pet shops. A person keeping a petshop must comply with conditions, including those set out in the Pet shops Regulations (Northern Ireland) 2000. Conditions include record keeping relating to details of each animal's source and date of sale. Keeping an unlicensed petshop and failing to meet the conditions of a petshop licence, are offences which each carry a penalty of up to three months imprisonment and/or a fine of up to £2,500. The Department established that none of the 57 pet shops in Northern Ireland sell canines or felines.

The Department explored legislation in other jurisdictions and noted that, unlike in NI, where there are rules for people who breed pups commercially but no rules for people who sell puppies and kittens, throughout Great Britain there are rules for both breeders and sellers. The pieces of legislation in place across Great Britain makes significant provision about rules for selling animals as pets, as part of a business.

The Department considered that intervention is required, as evidence has shown that previous media campaigns alone, are not sufficient deterrents as unsuspecting purchasers still obtain their puppy or kitten from someone who has not bred the animal themselves, and has not met the welfare needs of the animal. Despite frequent and high-profile endeavours to advise the public on sourcing a puppy from a reputable breeder, and despite the freely available Puppy Contact² which helps people buy and breed puppies responsibly, correspondence received by the Department, and media reports, indicate that people continue to unwittingly purchase puppies from rogue breeders who have given no attention to the welfare needs of the animals they sell. The purchasers then face long-term problems as the dogs go on to suffer from disease, illness, and behavioural problems later in life. Evidence suggests that rogue traders operate on a large-scale commercial basis, posing as small-scale private sellers. Their dogs and puppies are kept in poor conditions before being moved onwards, through a third-party, often to purchasers in Great Britain. Examples of this evidence are available through the DAERA-led Paws for Thought enhanced portal checks. For instance, in December 2023, an official found 58 dogs in a van (along with a cat which was being legitimately transported to its owner in England), as part of a puppy smuggling operation.

The Department carried out desktop research and explored a wide range of research materials relating to the experience of the animals. A Royal Veterinary College publication³⁴ indicates that sub-optimal purchasing behaviours such as not viewing a puppy in-person before purchase, viewing a puppy via video calls and/or photographs, and not collecting the puppy from inside the breeders' property, leave owners vulnerable to purchases from unscrupulous breeders and dealers, including puppies sourced by illegal importation and/or

² [The Puppy Contract - for responsible puppy breeding and buying.](#)

³ [RVC research reveals persistent illegal puppy selling post-pandemic - News - VetCompass - Royal Veterinary College, RVC](#)

⁴ [Is UK Puppy Purchasing Suffering a Long COVID Effect? Ongoing Negative Impacts of the COVID-19 Pandemic upon Puppy Purchase Motivations and Behaviours in 2021](#)

reared on puppy farms. A Kennel Club publication⁵ reports that irresponsible and/or illegal breeders, whose main goal is profit, produce large numbers of dogs with little concern for the health and welfare of the puppies they produce, or the dogs they use for breeding. A report entitled 'What Patterns in Online Classified Puppy Advertisements Can Tell Us about the Current UK Puppy Trade', May 2023⁶ reports that 'the UK puppy trade has moved almost entirely online, and production levels have risen, feasibly fuelled by unethical breeding, poor husbandry/handling practice, and reduced overheads. As a result, breeding stock and puppies may have suffered potentially fatal physiological and long-term psychological issues. Surveys of veterinary professionals report an increase in sick puppies purchased online, whilst the British Small Animal Veterinary Association (BSAVA) reports an epidemic of canine inherited disease.'. The 'Puppy acquisition: factors associated with acquiring a puppy under eight weeks of age and without viewing the mother'⁷ noted that owners who viewed only one of their puppy's parents had two and a half times increased odds of being referred to an animal behaviourist for a behavioural problem than owners who saw both parents, and owners who saw neither parent had nearly four times increased odds of being referred. It further noted how early life experiences (such as maternal care, genetics, environment, attachment and socialisation) can impact physiological and behavioural development. Puppies separated from maternal care at six weeks (but not their littermates) showed greater weight loss, distress, disease susceptibility and mortality up to six months of age compared with puppies that had remained in maternal care until 12 weeks of age, and puppies separated from maternal care between 30 and 40 days (i.e. just over 4 weeks and 5 weeks) were significantly more likely to display destructive behaviour, excessive barking, fearfulness on walks, noise reactivity, possessiveness towards food and toys, and attention-seeking compared with 70 puppies that remained in maternal care until two months (i.e. 60 days, or just over 8 weeks) of age. A publication 'On the origin of puppies: breeding and selling procedures relevant for canine behavioural development'⁸ noted that small-scale and occasional breeders provided the most enrichment, both social and non-social, by, for instance, providing more outdoor access for pregnant dams and puppies or by providing access to visitors more freely. A publication entitled 'Puppy factory farms: two cases, European Congress AWBM, 22 October 2016, Cascais Portugal'⁹ looked at puppy breeding in both a large scale factory farm and a family business. It noted that, in the large scale factory farm, the puppies presented signs of deprivation syndrome due to the lack of environmental and/or social relationships. It also noted that, in the family business, the 11 out of the 25 puppies died in a few days affected by congenital malformations due to close breeding. A British Veterinary Association publication¹⁰ highlights the importance of purchasing direct from the breeders.

The Department has also faced increasing calls to similarly ban the third-party sales of kittens, by way of correspondence cases, and engagement with animal welfare organisations, including Cats Protection. Cats Protection advise¹¹ that cats shouldn't be separated from their mothers until they are at least eight to nine weeks old and it encourages the public to visit a kitten, and see it with its mother, before agreeing to purchase it. It is suggested that this helps ensure the kitten has actually been bred by the seller/supplier, and is not illegally imported or brought from a kitten farm; which, in some scenarios, can result in serious health or behavioural problems. These recommendations are set out in 'The Kitten Checklist'¹². The checklist was developed by The Cat Group, a collection of nineteen professional organisations dedicated to feline welfare, and endorsed by The Canine and Feline Sector Group.

Policy objective

Objectives of a requirement to register for those who sell, give away, or otherwise transfer ownership of puppies and kittens are:

- the end of third-party sales of puppies and kittens;
- the establishment of conditions which will promote improved welfare of puppies and kittens;
- greater transparency and accountability; and
- improved traceability.

Options considered, and their costs and benefits

The Department considered legislation currently in place in NI. This involved exploring legislation in place in Northern Ireland relating to licensing of dogs (unique in the UK), dog breeding establishments, and pet shops; and the animal welfare legislation. The Department considered legislation relating to third-party sales of puppies and

⁵ [Avoiding puppy farmers | The Kennel Club](#)

⁶ [\(PDF\) What Patterns in Online Classified Puppy Advertisements Can Tell Us about the Current UK Puppy Trade](#)

⁷ [Puppy acquisition: factors associated with acquiring a puppy under eight weeks of age and without viewing the mother - Kinsman - 2020 - Veterinary Record - Wiley Online Library](#)

⁸ [On the origin of puppies: breeding and selling procedures relevant for canine behavioural development - Dendoncker - 2019 - Veterinary Record - Wiley Online Library](#)

⁹ [\(PDF\) Puppy factory farms: two cases](#)

¹⁰ [Dog breeding defects emerge as top concern for vets](#)

¹¹ [Getting a cat - Help & Advice | Cats Protection](#)

¹² [the-kitten-checklist.pdf](#)

kittens in place in England, Scotland, and Wales, and explored the requirements in other places such as the Republic of Ireland (ROI), Queensland (Australia), Texas (USA), Belgium, Denmark, France, Sweden, and the Netherlands.

In total 9 options were considered, and these fell into 4 categories: do nothing; introduce a registration system; introduce a licensing system; and introduce a ban on third-party sales.

Although the Department has received calls for legislation like that in England, Scotland, and Wales, the options developed for Northern Ireland (as set out below) differ slightly. Local Authorities in England, Scotland, and Wales, are each required to carry out a Business Test to determine if a person is selling animals as pets as part of a business. As an example, things to be considered by a Local Authority might include: distribution and selling activities; time period from when animals are bought to when they are re-advertised for sale; volumes of sales; and regularity of advertisements. It was considered that this would place an inappropriate heavy burden on the enforcement body (councils) and would also carry a risk of persons successfully hiding their activities and evading requirements. It was also noted that, unlike England, Scotland, and Wales, Northern Ireland is unique in that it requires anyone who keeps a dog to obtain an annual dog licence from their local council for that dog. The Department explored options that would enable this dog licensing requirement to be linked to the new policy.

Options considered:

(NB, sales/sell/selling includes sales, giving away, or otherwise exchanging ownership of puppies and kittens)

In summary, based on matters including clarity for those who sell, give away, or otherwise transfer the ownership of puppies and kittens, enforceability, and level of burden, the preferred option was identified as option 4: introduce new legislation to require all persons who sell, give away, or otherwise transfer ownership of puppies and kittens to obtain a licence.

Option 1: do nothing

This Option, which would see no costs but also no benefits, was ruled out because the rolling-out of messaging campaigns has not proven significantly successful in deterring rogue breeders and sellers. Although the messaging campaigns have raised the profile of welfare of puppies and kittens that are sold, it remains the case that it is difficult to spot a breeder/seller who is posing as a pet owner selling the offspring of his/her family pet. Although maintaining the status quo would mean no additional enforcement requirements, it would mean that third-party sales of puppies and kittens would continue unfettered, and it would mean that puppies and kittens that are sold, given away, or otherwise transferred to new owners, will remain at risk of poor welfare outcomes. It is noted that Option 1 could mean that the Department might face negative press from all corners, disappointed in the fact that there will be no change.

Option 2: amend current pet shops legislation. Require hobby breeders, which are dog breeders who do not fall into the definition of a 'breeding establishment' (which is set out in current dog breeding establishments (DBEs) legislation, and which are licenced by their local council), and cat breeders (which are currently unregulated) to obtain a petshop licence, and specify all petshop licence holders are to meet new conditions IRO sales of puppies and kittens.

Regulations are in place requiring anyone who keeps a petshop to first obtain a licence from the Department, at a cost of £20.00 per year. This Option would mean anyone who sells, gives away, or otherwise transfers the ownership of puppies (and is not within the scope of current dog breeding legislation) and anyone who sells, gives away, or otherwise transfers the ownership of kittens would be deemed to be a petshop, and would therefore be brought within the scope of petshop licensing requirements.

It was noted that the definition of pet shops explicitly excludes premises where pedigree animals are bred and sold, and so it was considered that this option might create a loophole in this regard. Any loophole will attract criticism and there will be an administrative cost in responding to the criticism and attempting to close any loophole. It was further noted that the fee of £20.00 is already considered to need review, and might not therefore provide for cost-recovery. However, a benefit of this option is that it would build upon legislation already in place and might require less time progressing through legislative routes. Costs of this option are that there would be an additional administrative role, and enforcement role, for the Department regarding processing increased applications for a petshop licence. In addition, citizens of Northern Ireland would face new licensing requirements, which would bring with them the requirement to pay a fee of £20.00.

This Option was ultimately ruled out because it would mean that all persons selling, giving away, or otherwise transferring the ownership of puppies and kittens would potentially be required to invest in infrastructure as set out in the current pet shops legislation, for example, relating to animal enclosures, housing, and management. This was considered to be an excessively disproportionate way of dealing with the issue.

Option 3: amend current dog breeding establishments (DBE) legislation. Require dog breeders who do not fall into the definition of a dog 'breeding establishment', and cat breeders, to obtain a breeding establishment licence, and specify licence holders to meet conditions IRO sales of puppies and kittens.

Regulations are in place requiring anyone who keeps a dog breeding establishment to first obtain a licence from their local council. A licence is required by anyone who keeps 3 or more breeding bitches; and who also either breeds/advertises/supplies 3 or more litters in any twelve month period; or advertises a business of breeding or selling puppies. The licence is yearly, and the fee is based on number of breeding bitches kept. The minimum fee is £150.

This Option would mean that the anyone who sells, gives away, or otherwise transfers the ownership of puppies would be treated as a dog breeding establishment, regardless of the number of breeding bitches that they kept, and would therefore require a licence from their local council. This Option would also see anyone who sells, gives away, otherwise transfers the ownership kittens being brought into the licensing system, and therefore requiring a licence from their local council.

A benefit of this option is that it would build upon legislation already in place and might require less time progressing through legislative routes. Costs of this option are that there would be an additional administrative role, and enforcement role, for councils regarding processing increased applications for a licence to keep a dog breeding establishment. Another cost might be related to the clarity of the new rules. The legislation in place is focused completely on dogs, and there might be a misconception that the new rules do not apply to cats. This could attract negative comments, and there could be an administrative cost incurred in replying to the comments. In addition, citizens of Northern Ireland would face new licensing requirements, which would bring with them the requirement to pay a fee, set at a minimum of £150.

This Option was ruled out as it would potentially require persons to invest in infrastructure as set out in the current dog breeding establishments legislation, namely regarding matters such as accommodation construction and size; and temperature and lighting. It was also considered difficult to include provision regulating selling, giving away, or otherwise transferring ownership of kittens through legislation widely known as dog breeding legislation as it might cause confusion, and carry the risk that cat owners might think it would not apply to them. In short, this was considered to be a disproportionate, and potentially confusing, way of dealing with the issue.

Option 4: introduce new legislation to require all persons who sell, give away, or otherwise transfer ownership of puppies and kittens to obtain a 'sellers licence'.

This Option was initially deemed to be the preferred option. The introduction of a licence to sell, give away, or otherwise transfer the ownership of puppies and kittens, coupled with a public register of licence holders, has the potential to be straightforward and clear in its intent, and would mean that all people in Northern Ireland who sell, give away, or otherwise transfer the ownership of these young animals, should easily be able to produce their licence so as to reassure the purchaser that the puppy or kitten has been bred at the specified premises, has stayed with its mother as appropriate, and has enjoyed good welfare experiences. The Option also includes the ability for councils to set a fee as they each deem appropriate, and therefore has the potential to progress towards full cost-recovery.

There are several costs associated with this option arising from the additional administrative role for councils to process applications for a Seller's Licence; the additional role for councils regarding the creation and upkeep of a register of people holding a Seller's Licence; and the administrative and financial costs to Northern Ireland citizens who will be required to follow the licensing requirements, and pay the associated fee. A benefit of this option was, due to the fee being set at nil for non-businesses for the first year (in recognition that owners might be faced with an accidental pet pregnancy), it was considered that the reality of paying a fee for a second accidental litter, the option might increase pet owners to neuter their pets where they don't intend to breed from them (as advised in the DAERA Codes Of Practice).

This option was ultimately not progressed as the enabling legislation means that a licensing system would require mandatory inspection of premises by councils. A mandatory inspection of all premises was considered to be an excessively disproportionate way of dealing with the issue.

Option 5: introduce new legislation setting out rules for all sales of pups and kittens, which would apply to all licensed DBEs, and also to hobby breeders and cat breeders. This would not involve a licensing or registration system.

This Option would mean that new legislation would set out a requirement for anyone selling, giving away, or otherwise transferring ownership of puppies and kittens to adhere to specified rules. The rules would be set out in the legislation. There would be no requirement for the puppy/kitten owner to obtain a licence, or to register with councils. There would be no change in the daily activities of breeders or sellers, or indeed purchasers.

The cost of this option would be an additional enforcement role for councils, as they responded to reports of people not complying with this requirement. A benefit for councils is that the additional enforcement role would be minor as it would not be required to licence or register anyone. Another cost of this option might be the limited impact the legislation might have, compared to the calls for robust action.

This Option was ruled out because it meant that the breeder/seller did not have to obtain a licence, and did not have to be registered, and therefore it did not enable a purchaser to easily identify breeders/sellers that complied with the rules.

Option 6: introduce new legislation to require DBEs licence holders to meet new conditions regarding sales, and which would require unregulated 'hobby' breeders, and cat breeders, required to register with councils.

Regulations are in place requiring anyone who keeps a dog breeding establishment to first obtain a licence from their local council. A licence is required by anyone who keeps 3 or more breeding bitches; and who also either breeds/advertises/supplies 3 or more litters in any twelve month period; or advertises a business of breeding or selling puppies. The licence is yearly, and the fee is based on number of breeding bitches kept. This Option would mean that the licence conditions would be revised to include new rules about the sales made by these breeding establishments. This Option would also mean that hobby breeders, and people who sell kittens, would be required to register with their local council.

There are several costs associated with this option arising from the additional enforcement role for councils regarding ensuring compliance with the new breeding licence conditions regarding sales. It would also place an administrative burden on councils to process applications from hobby dog breeders, and cat breeders, to be placed on a register of sellers. In addition, there is an administrative and financial cost to Northern Ireland citizens who will be required to follow the registration requirements, and pay the associated fee. Another cost of this system is related to a potential loophole: it will not be clear to a purchaser whether the seller should be licensed or registered, and this could give rise to illegal activities going undetected.

The Option was ruled out because of the risk that it would not be seen by rogue breeders/sellers as a sufficient deterrent to their activities.

Option 7: introduce new legislation to regulate all animal activities, commencing with sales of pups and kittens

This Option would mean that a system licensing activities involving animals would be introduced to NI, similar to the systems in place in England, Scotland, and Wales. Due to the time left in the current mandate, the only activity to be licensed would be selling puppies and kittens and pets, and future mandates could potentially explore the revocation and replacement of the current legislation about dog breeding, pet shops, and horse-riding, with a single licensing system.

There are several costs associated with this option arising from the additional administrative role for councils to process applications for a licence to sell puppies and kittens; and the administrative and financial costs to Northern Ireland citizens who will be required to follow the licensing requirements, and pay the associated fee.

This Option was ruled out because although it would be quite similar to the systems in place across Great Britain, it was considered to be without guarantee of completion in current, and future, mandates. It was considered that other options under consideration might achieve the same goal, but carry less risk of non-completion.

Option 8: make new legislation to require anyone who sells a puppy or kitten, to prove that they keep the mother.

This Option would utilise dog licensing provisions already currently in place. The 1983 Order currently requires a person to have a dog licence for their dog. Where that dog has puppies and the person intends to sell them, the 1983 Order also requires that the seller must first see that the purchaser has obtained a licence for the dog they are about to purchase. This Option would mean that messaging around this requirement was deployed so that sellers and purchasers were aware of the current requirements. It was considered that anyone selling a puppy would be able to prove that he/she is the owner of the bitch who produced that puppy, and that they are not a third-party seller. Legislation and messaging could also provide that the purchase must take place in the presence of the mother, and the dog licence for that mother must be produced. Also, the sales must only take place at the premises where the mother resides (i.e., the registered address on the dog licence).

In terms of kittens, this Option would also mean that the Department would make regulations under sections 11 and 12 of the 2011 Act to introduce a requirement that anyone who sells kittens cannot sell kittens he/she did not breed himself at his/her premises, and that he/she is the owner of the kittens' mother.

This Option was ruled out because it was noted that the 1983 Order requirement for the seller of dogs to first see that the purchaser has already obtained a licence for the dog they are about to purchase is not routinely enforced. It was also considered that enforceability might be a significant issue. Finally, this Option was also ruled out because it meant that the breeder/seller did not have to meet any new responsibilities (such as obtain a licence or

register), and, given the fact that these breeders/sellers currently ignore good practice and, in some cases, the obligation to obtain a licence to keep a dog breeding establishment, it did not enable a purchaser to easily identify breeders/sellers that complied with the rules.

Option 9: make new legislation to require anyone who sells a puppy to prove that they keep the puppie's mother, and introduce a cat seller's licence

This Option would utilise provisions already currently in place. The 1983 Order currently requires a person to have a dog licence for their dog. Where that dog has puppies and the person intends to sell them, the 1983 Order also requires that the seller must first see that the purchaser has obtained a licence for the dog they are about to purchase. This Option would mean that messaging around this requirement was deployed so that sellers and purchasers were aware of the current requirements. Legislation could also provide that the purchase must take place in the presence of the mother, and the dog licence for that mother must be produced. Also, the sales must only take place at the premises where the mother resides (i.e., the registered address on the dog licence). This Option would also introduce a cat seller's licence for anyone who intended to sell kittens.

There are several costs associated with this option arising from the additional enforcement role for councils to respond to reports that a puppy seller did not adhere to the new requirements; the additional administrative role for councils to deal with applications to be a licensed kitten seller; and the costs to Northern Ireland citizens who will be required to follow the licensing requirements, and pay the associated fee.

This Option was ruled out because it meant that the breeder/seller of puppies would not have to meet any new responsibilities (such as obtain a licence or register), and, given the fact that these breeders/sellers currently ignore good practice and, in some cases, the obligation to obtain a licence to keep a dog breeding establishment, it did not enable a purchaser to easily identify breeders/sellers that complied with the rules. It was considered that this Option would create uneven systems in that it would create the licensing of kitten sellers and there would be little to no change for puppy sellers.

Final Options

Initially, Option 4, introduce new legislation to require all persons who sell, give away, or otherwise transfer the ownership of puppies and kittens to obtain a licence was determined to be the preferred option. However, it was noted that, under the 2011 Act, a licensing system would bring with it a mandatory inspection by councils. Mindful of council feedback at a February 2025 workshop, where councils expressed concern about enforcement, option 4 was deemed to be no longer the preferred option as it carried with it, significant burdens for councils. The final option was deemed to be introduce new legislation to require all persons who sell, give away, or otherwise transfer the ownership of puppies and kittens to apply to their local council to be entered into the council Register of Sellers and Suppliers of puppies and kittens.

The introduction of a registration system, of those who sell, give away, or otherwise transfer the ownership of puppies and kittens, coupled with a public register of registered people, has the potential to be straightforward and clear in its intent, and would mean that all people in Northern Ireland who sell, give away, or otherwise transfer the ownership of these young animals, should easily be able to produce their registration confirmation so as to reassure the purchaser that the puppy or kitten has been bred at the specified premises, has stayed with its mother as appropriate, and has enjoyed good welfare experiences. Purchasers will also be able to consider a public-facing register of sellers and suppliers, and will therefore be able to avoid any person not on the register.

While the public council register of sellers and suppliers of puppies and kittens will detail sellers, by virtue of the Lucy's Law condition of registration which will limit them to selling only puppies and kittens that they breed themselves at the premises, it will also shine a light on dog breeding establishments; including those which ignore current dog breeding establishments licensing requirements (known as illegal puppy farms). The public council register of sellers and suppliers will compliment those dog breeding establishments which currently abide by the licensing requirements, as the transparency will foster trust and credibility among potential buyers, as they can easily verify the legitimacy and reputation of the breeders.

Monetised and non-monetised costs and benefits of preferred option (including administrative burden)

Costs to sellers/suppliers of preferred option: registration

The Department does not hold information on the numbers of people or pet shops that will become sellers/suppliers of puppies and kittens. Nor does it hold information on licensed Dog Breeding Establishments. The cost to these people and businesses of registering with their local council as sellers and suppliers of puppies and kittens, is unknown at this juncture. However, the following figures have been calculated from a range of sources, to provide initial, illustrative, estimations.

Initial direct costs

Anyone who is required to register as a seller or supplier of puppies and kittens is not expected to face set-up costs as the operations they use now will remain the same under the proposed policy and there is no requirement, for example, to install new facilities. While registration brings with it mandatory conditions, they relate to matters relating to the welfare of their animals, for example, only sell or supply puppies and kittens aged eight weeks or over. However, registered persons will be required to maintain a register for all dogs and cats, and puppies and kittens, on the registered premises; and will be required to provide the purchaser with information on caring for a puppy or kitten. Again, these conditions do not require installation of new equipment. The Department does not hold any information on the impact of this requirement. However, it is expected to be minimal as businesses will already hold records relating to their animals, and non-businesses who produce, for example, one litter per year will face minimal requirements. In this particular scenario, it is considered that records do not have to be electronic.

Ongoing direct costs

Anyone who is required to register as a seller or supplier of puppies and kittens will face an annual registration fee, for every year they are required to be registered.

Potential puppy sellers/suppliers (non-business): in April 2023 to March 2024, councils issued 133,677 dog licences, and 60,652 of these were neutered¹³. Of the 73,025 un-neutered dogs, if half are female, and capable of breeding, then this means that 36,513 dogs might produce puppies. If 100% of these dogs produce a litter, and 100% of owners sell the puppies, 36,513 people would have to register as a seller or supplier (however, it is noted that some owners will have more than one dog and litter but only require one registration. It is also noted that the actual total dog population in Northern Ireland will be higher, as not every owner obtains the necessary licence. Sellers and suppliers would face a registration fee, for each year that they intend to sell/supply puppies, and the cost of the annual registration fee will be determined by their local councils. This fee will only be applicable from year two of being a registered seller/supplier of puppies, as for non-businesses the fee for the first year of registration is zero. This fee of zero in the first year of registration, for non-businesses, is in recognition of the fact that pet owners may face an accidentally pet pregnancy.

Potential kitten sellers/suppliers: A Cats Protection Report, about Cats and Their Stats Northern Ireland 2024¹⁴, states there are 250,000 owned cats in NI, and 90% are neutered. Of the 25,000 un-neutered cats, if half are female, and capable of breeding, there are 12,500 cats that could produce kittens. If 100% of these cats produce a litter, and 100% of owners sell the kittens, then 12,500 people could be impacted by the proposed requirement to register as a seller or supplier (however, it is noted that some owners will have more than one dog and litter, but only require one registration). They would face a registration fee, for each year that they intend to sell/supply kittens, and the cost of the annual registration fee will be determined by their local councils. This fee will only be applicable from year two of being a registered seller/supplier of puppies, as for non-businesses the fee for the first year of registration is zero. This fee of zero in the first year of registration, for non-businesses, is in recognition of the fact that pet owners may face an accidentally pet pregnancy.

Pet shops: there are 57 pet shops in NI, none of which sell canines or felines. If all these decide to sell puppies and kittens, all 57 will be impacted by the proposed requirement to register as a seller or supplier of puppies and kittens. They would face a registration fee, for each year that they intend to sell/supply puppies and kittens, and the cost of the annual registration fee will be determined by their local councils. This fee will be applicable from the first registration.

Dog breeding establishments: A USPCA publication¹⁵ indicates there are 45 licenced dog breeding establishments in NI. All 45 would be impacted by the proposed requirement to register as a seller or supplier. They would face a registration fee, for each year that they intend to sell/supply puppies, and the cost of the annual registration fee will be determined by their local councils. This fee will be applicable from the first registration.

Fees/costs: there is no indication as to how councils might set their individual registration fees. If councils decided to set the fee on a full cost-recovery basis, the fee might vary across councils, as each council might have differing costs.

The Department has explored the fees, for similar systems in England, Scotland, and Wales, and (from a random selection) noted that fees range from £162 to £315. It is noted however that these fees relate to people selling animals as pets in the course of a business, includes an amount to cover the inspection costs (which will not be applicable in NI), and does not include dog breeding establishments. Therefore, for the purposes of this illustration, the lower amount of £162 is used.

¹³ [Council Dog Summary Statistics 2024/25 | Department of Agriculture, Environment and Rural Affairs](#)

¹⁴ [cats-report-northern-ireland-2024-v2.pdf](#)

¹⁵ [Layout 1](#)

- Should councils decide to each set the registration fee at £162, then the 57 pet shops will be required to pay an annual registration fee of £162. Should councils decide that the fee for a dog breeding establishment should be the same as the fee for a petshop, then the 45 licenced dog breeding establishments would be required to pay an annual registration fee of £162. (57 pet shops + 45 DBEs x £162 per year each = £16,524 per year, total cost to NI's pet shops and dog breeding establishments).
- If councils decide that non-businesses should pay a fee equal to half of businesses, potentially 36,513 people would pay £50 each (i.e. totaling £1,825,650). On the other hand, if councils decided that the fee should be equal to the lower range of the dog licence fee, potentially 36,513 people would pay £5 (i.e. totaling £182,565). Or, if councils decide the fee should equal the upper range of the dog licence fee, potentially 36,513 people would pay £12.50 (i.e. totaling £456,412.50). As mentioned, this fee will only be applicable from year two of being a registered seller/supplier of, as for non-businesses the fee for the first year of registration is zero.
- If councils decide that the fee for sellers/suppliers of kittens should be the same as the fee for non-businesses that sell/supply puppies, potentially 12,500 people would pay either £50 (£625,000), £12.50 (£156,250), or £5 (£62,500). As mentioned, this fee will only be applicable from year two of being a registered seller/supplier, as for non-businesses the fee for the first year of registration is zero.
- For the purposes of this exercise, the Department has used the middle figure of £12.50 per registration, to estimate the ongoing direct cost. This means that the costs are estimated at £612,663 for non-businesses.

Councils may wish to set a scale of fees. For businesses it might depend on the scale of the business, and for non-businesses it might depend on whether person is in receipt of income-related benefits. It is also noted that councils may wish to set the fee at nil.

Costs to councils (preferred option: registration)

Under animal welfare legislation, councils are responsible for enforcement relating to companion/pet animals. Councils will therefore be the registering authority under the proposal. The Department does not hold any information on the council resources which will be used to exercise its role to administer and enforce the new rules.

Initial direct costs

There potentially could be no initial set up costs, as councils already have in place a system for electronic recording the receipt of applications for dog licences, and the issue/granting of dog licences. It is considered that there may be potential for utilising this system for the recording of the proposed registration system. However, it is considered more likely that there will be a cost for councils in securing the system enhancements that would facilitate collection and storage of the additional data; for example system amendments to capture additional information regarding prohibited breeds cost £16,000.

There will be costs for setting up a public-facing Register of Sellers and Suppliers of Puppies and Kittens, either on an individual council basis or on a single NI-wide basis.

Ongoing direct costs

There may be ongoing costs for maintaining electronic records relating to registered sellers and suppliers. There will be ongoing costs for maintaining a public-facing Register of Sellers and Suppliers of Puppies and Kittens. The Department is aware that the register in Republic of Ireland is updated with new applicants every two weeks.

Initial and ongoing indirect costs

There may be costs including staff training, and administrative activities, following implementation of the new procedures.

An example of an ongoing direct cost is if a council is made aware of an advertisement of puppies or kittens for sale/supply that is not in compliance with the conditions of registration, it might take investigatory action. Another example is if a council is aware that a registration is about to end, the council might decide to issue a renewal reminder notice. A third example is the issuing of revocation of registration notification letters to individuals reported to the council and subsequently found to be in breach of the regulations.

Benefits for sellers and suppliers from preferred option: registration

Responsible sellers will be protected from illegal operators, whose practices not only prevent new owners from getting a happy and healthy puppy or kitten, but also thwart the best efforts of responsible sellers. This is because any seller or supplier of puppies and kittens will have to be registered with their council and have their details held

in a public-facing register. The matter of selling puppies and kittens will therefore be much more open and transparent, and all purchasers wishing to get a puppy or kitten will be able to establish that someone who does not hold the required registration status is selling or supplying the animals illegally.

Benefits for government, and other bodies, from preferred option: registration

HMRC

The public-facing register of Sellers and Suppliers will shine a light on the full-scale of the trade in NI, and highlight individuals who are potentially posing as one-off sellers and suppliers but who are in fact undertaking the activity on a regular and commercial basis, making significant income from their activities. This has the potential to recoup lost tax revenue as those persons are brought to light.

The Department does not hold information on the scale of lost tax revenue, but notes that the USPCA publication reports that 'between 2015 and 2019 HMRC seized more than £5 million from individuals involved in the illicit breeding and sale of pups across the United Kingdom. This was in respect of unpaid taxes. This is another indicator of the huge profits emanating from this trade'. Therefore, using a basic calculation, this might equate to at least £312,500 per year in NI. It is expected that the true figure is much higher.

The Department notes that the UK Government website indicates that HMRC ordered one dealer in Northern Ireland to pay £185,000 in tax¹⁶. In addition, the Department is aware that 10 cockapoo pups were recovered by the Belfast Harbour police after being transported illegally. The retail value of these pups was estimated at over £8,000. Again, this is an example of fraudsters selling puppies on a mass scale and for a huge profit and failing to declare their sales, thus avoiding paying tax.

It is not possible to quantify the scale of illegal/irresponsible breeders and sellers. However, referring to the USPCA publication, which indicates that it has knowledge of more than 30 unlicensed dog breeding enterprises operating across Northern Ireland, even if only 10 of these had a tax bill similar to the one mentioned above, that would equate to a saving of at least £1,850,000.

Councils and pet owners

New owners who get their new puppy or kitten from a registered breeder, will potentially be spared thousands of pounds in vet fees as the puppy or kitten will have been bred and sold in good welfare conditions. Being in this position will mean that they will have no need to report illegal activity to their local council.

In terms of quantifying this potential saving, using the Pets Dispensary for Sick Animals PAW Report 2024, which indicated that 25% of people got their dog from private sellers, combined with the potential 36,513 people who might register as a seller or supplier, this could indicate the potential for 9,000 private sellers. If one tenth of these were operating in an illegal capacity, that could leave at least 900 Northern Ireland puppy buyers left holding a sick animal, and likely to consider making a complaint to their local council that the seller caused unnecessary suffering, or was operating an illegal dog breeding establishment. The ensuring enforcement activity would be a significant drain on council resources.

The Department notes that in 2020, Defra 'Petfishing' research¹⁷ found that 54% of the vets they surveyed said that the poor conditions of puppy or kitten farms can lead to illnesses and complications which would incur treatment costs of over £1,500 in the first year of the animal's life, and in some severe cases, the costs could rise to £5,000 or even result in the pet being euthanised. Research carried out for The Kennel Club's 'Be Puppywise' campaign found that almost a third (31%) of puppies get sick or die in their first year, and four in ten owners (40%) fear they bought from a puppy farm after spending little time researching. Therefore, using this information, and the figures above, it suggests that 1 out of every 3 people that have recently bought a puppy could spend between £1500 to £5000 on veterinary fees. Thwarting this activity would therefore create potential for savings of £1,500 to £5,000 per person, per animal. Using the figure above, of 900 puppy buyers, this would equate to a range of from £1,350,000 to £4,500,000 across Northern Ireland.

In terms of benefits for councils, the Department notes an example of a successful prosecution against an illegal puppy farmer in Armagh¹⁸ which saw the defendant ordered to pay the council's legal fees and court costs, which amounted to £330, as well as the £2,560 in costs incurred by the council for the care of the rescued dogs. So, in total, the council was paying nearly £3000 (before repayment) for one case of illegal breeding. Thwarting this activity would therefore create potential for savings of £3,000 per case. Again using the figure above, of 900 puppy buyers, this would equate to savings of £27,000.

Wider impacts, from preferred option: registration

¹⁶ [Millions raised from tax evading dog breeders - GOV.UK](#)

¹⁷ [Coverage of new campaign on responsible pet ownership – Defra in the media](#)

¹⁸ [49 dogs kept in squalor seized from illegal puppy farm in Armagh - Armagh City, Banbridge and Craigavon Borough Council](#)

It is considered that the current state, namely no regulation of sellers and suppliers of puppies and kittens, means that the market is currently distorted, as illegally bred, and irresponsible bred, puppies and kittens mean that the sellers and suppliers are gaining maximum profit and leaving buyers open to higher veterinary costs, and councils and legal systems burden with the cost of dealing with these illegal and irresponsible sellers and suppliers.

Proper regulation will mean that all sellers and suppliers will be subject to the same rules, and this will mean that they are all operating in a level playing field, and in a much more stable market. Implementing a registration scheme for sellers and suppliers of puppies ensures that all transactions are recorded and monitored. This helps in maintaining a transparent marketplace where all participants are accountable for their actions. By requiring registration and adherence to specific rules, it becomes easier to identify and take action against illegal breeders and sellers. This will help curb the black market.

In short, by implementing and enforcing uniform requirements for all sellers and suppliers of puppies and kittens, the marketplace can become more transparent, accountable, and fair, ultimately benefiting both consumers and legitimate businesses.

Risks and assumptions

The following assumptions have been made.

- Commercial breeders, licensed by councils, meet the welfare requirements set out in regulations. Puppy sales are to establishments in Great Britain, and to drop-in/ad-hoc purchasers in NI.
- Puppy farm breeders ignore legislative requirements. They sell to ad-hoc purchasers via online sales, including to purchasers in Great Britain.
- Hobby breeders sell their pups to drop-in/ad-hoc purchasers in NI, and/or to people they know (e.g. friends, neighbours).

It is also assumed that implementing and enforcing uniform requirements for all sellers and suppliers of puppies and kittens will bring all sellers and suppliers into focus, and this will help thwart illegal breeders. It is also assumed that reports of sales and supplies by those persons not on the council register, will increase as awareness of the issue increases.

It is also noted that there remains a risk that potential new owners will either be unaware of the new register of sellers and suppliers that they should refer to, or will be aware of the register but still choose to get a puppy or kitten from an unregistered seller or supplier.

Overall impact

The proposed policy, which mandates uniform requirements for all sellers and suppliers of puppies and kittens, brings with it significant benefits that outweigh the costs. By creating a transparent, accountable, and fair marketplace, it helps protect consumers and legitimate businesses while counteracting the practices of illegal breeders, sellers and suppliers. Although risks remain, such as disregard to be recorded in the Register of Sellers and Suppliers of Puppies and Kittens, the overall impact is positive, fostering better welfare standards for Northern Ireland's puppies and kittens, and increased reporting of illegal sales. The proposed policy advocates for the betterment of Northern Ireland's animal welfare landscape.