

**Review of the dog
breeding regulations
in Northern Ireland, with
recommendations to
improve animal welfare**

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Executive Summary

This report details the findings of a review of the existing dog breeding legislation and regulations in Northern Ireland. This was produced by an independent Expert Advisory Group appointed by the Department of Agriculture, Environment and Rural Affairs (DAERA) in July 2025. In conducting this review, the panel met with a wide variety of stakeholders and visited a number of licensed breeding establishments of varying sizes. In addition, the group reviewed relevant scientific evidence and conducted an extensive questionnaire survey of the veterinary profession in Northern Ireland. Importantly, having reviewed the relevant evidence, the group was tasked with making recommendations for future consideration which aim to improve upon the existing legislation, with a particular focus on animal welfare.

In Northern Ireland, dog breeding is primarily regulated under *The Welfare of Animals (Dog Breeding Establishments and Miscellaneous Amendments) Regulations (Northern Ireland) 2013* ('the 2013 Regulations'). Since the introduction of this legislation, the landscape of dog breeding has changed significantly, with increased public awareness of animal welfare and changes in market dynamics, including surges in demand and the proliferation of online sales. Furthermore, the number of licensed breeding establishments has increased since the regulations were introduced.

As the vast majority of puppies arising from dog breeding are destined to become family pets for companionship, the topic is of considerable societal importance. Concerns have been raised by the public and other stakeholders that the existing regulations do not adequately protect the welfare of the animals involved. The term 'animal welfare' relates to both the physical health and the psychological wellbeing of animals. In this regard an animal can be healthy but still have poor welfare if their behavioural and psychological needs are not met. Furthermore, it is important to keep in mind that through the process of domestication, dogs have been selectively bred to seek social interactions with humans, with the human-dog bond and opportunities to socialise with other dogs being central to their welfare.

Moreover, in recent years there have been important policy developments that recognise that animal welfare is more than avoiding negative welfare states but also includes promoting positive experiences and states of welfare to ensure a life worth living and ideally a good life. The existing regulations were therefore reviewed within this context.

The report provides an overview of the existing legislative framework for regulating dog breeding in Northern Ireland. **The widely held view across the stakeholders we consulted and engaged with is that, as currently drafted, these regulations do not adequately serve to protect the welfare needs of breeding dogs and their puppies.** Concerns have been consistently raised with us that dog welfare across many breeding establishments is poor. Taking this into account, this report outlines a number of particular areas of concern (where existing regulatory provision is required or could be enhanced). These areas include: licensing thresholds, number of dogs kept at breeding premises, limitations on breeding related to litter numbers, litter frequency, breeding ages, veterinary oversight of breeding premises, environment and enrichment for dogs, staffing levels and expertise of staff, the welfare of stud dogs, socialisation programmes for puppies, extreme conformation and suitability to breed, retirement protocols for breeding dogs, controls on the sale of puppies, record keeping and traceability, and the licence fee structure and enforcement provisions.

The report evaluates each of these areas in detail and provides a number of recommendations for the Department to consider in order to improve the existing legislative framework. These recommendations relate to:

- 1) changing the licensing threshold to make it less ambiguous and set at 2 litters of puppies per year;
- 2) introducing a cap of 25 as the maximum number of dogs that can be kept at a breeding establishment;
- 3) changes to the mating rules including aspects related to the minimum mating age and number of litters allowed;
- 4) introducing regulatory protection for stud dogs and retired breeding dogs;
- 5) introducing a requirement for veterinary oversight at breeding premises inspections;
- 6) updating regulations related to exercise, enrichment and socialisation of dogs and puppies;
- 7) staff provision, including training;
- 8) fitness to breed;
- 9) traceability;
- 10) animal welfare inspections and enforcement; and
- 11) procedures for the sale of puppies.

A summary of the key recommendations that should be implemented as a matter of priority are provided in the report.

Canine companions have many well-documented societal benefits, and it is therefore important to facilitate an appropriate supply of healthy, well-adjusted, ethically sourced puppies as a public good. With this in mind, when considering our recommendations we aimed to find a balance that enhances animal welfare whilst also facilitating the regulated supply of ethically bred dogs. At present, the existing legislation does not adequately safeguard all aspects of animal welfare. Furthermore, the review also highlighted the ongoing welfare issues associated with breeding for extreme conformation related traits, with recommendations made to help address that.

We are grateful to DAERA for establishing the Expert Advisory Group to review the existing breeding regulations and provide recommendations to inform legislative change that will enhance animal welfare. The panel also recognises the challenges around illegal dog breeding and our recommendations are aimed at reducing ambiguity regarding the threshold for requiring a licence whilst also providing advice to assist with enforcement and inspections.

Dog breeding is a societal issue, with existing deficits in our legislation resulting in a series of negative outcomes for prospective owners and dogs. Therefore, this review and our recommendations offer a timely opportunity for Northern Ireland to be at the forefront of ensuring dogs are bred in a way that both ensures their welfare and provides the public with a supply of companion pets that will enrich their lives.

Foreword

It has been a privilege to Chair the Expert Advisory Group tasked with reviewing the dog breeding regulations in Northern Ireland. Together with the other members of the group, Vanessa Barnes and Susan Cunningham, we viewed the task as a timely opportunity to reform the existing regulations, with animal welfare as a central focus. Given the role dogs play as family companions, we felt the responsibility of the task and the need to ensure an ethical and sustainable supply of dogs that are equipped to thrive. Furthermore, the welfare of the breeding dogs, including stud dogs, was also central to our evidence gathering. With that in mind I would like to thank all those that contributed evidence and engaged in stakeholder meetings with us, including the breeders who invited us to visit their facilities. Dog breeding is understandably an emotive issue, and I am extremely grateful to all those who engaged with the group and shared their valuable expertise with us.

In recent years, Northern Ireland has been viewed as lagging behind other jurisdictions in its dog breeding regulations. Our report begins by highlighting concerns with the existing situation. However, importantly, it then makes a series of recommendations to address the concerns. These recommendations offer a framework that would place Northern Ireland at the forefront of safeguarding animal welfare in relation to dog breeding. The ambition of the group is to see reform that results in Northern Ireland leading the way in standards of dog breeding. This includes a timely opportunity to show leadership in addressing welfare issues associated with breeding for extreme conformation. We appreciate that this is a journey and that seeking perfection must not stand in the way of making good progress. We also appreciate that some of our recommendations could be implemented quickly, whilst others will require more time to develop.

When reading this report I would encourage you to keep the term 'animal welfare' at the forefront of your mind. When doing so remember that animal welfare relates to both physical health and also importantly to psychological wellbeing. In recent years scientists have developed validated approaches to monitor and assess the behavioural and mental aspects of welfare and these need to be reflected in the regulations. It is no longer acceptable to consider adequate welfare as being free from negative things. Instead, dogs must have opportunities to engage in positive experiences and states that enhance their welfare and provide them with a life worth living and a good life. Given the benefits dogs provide to us, as

a society we have a responsibility to ensure we safeguard their welfare. This report has taken a holistic and wide-ranging view of dog breeding and outlines a framework that when implemented will see Northern Ireland at the forefront of ensuring dogs are bred in a responsible way that benefits them and the consumers who will purchase their future beloved family pet.

Introduction

Since the introduction of *The Welfare of Animals (Dog Breeding Establishments and Miscellaneous Amendments) Regulations (Northern Ireland) 2013* ('the 2013 Regulations'), the landscape of dog breeding has changed significantly, with increased public awareness of animal welfare and changes in market dynamics; including surges in demand and the proliferation of online sales. This has led to an increase in the number and scale of commercial breeding establishments (from 25 licensed premises housing 1,023 bitches in 2015¹, to 52 licensed premises housing 1,913 bitches in June 2025²) and a widespread perception of Ireland (North and South) as a major puppy supplier and exporter, with public concerns persistently raised about unscrupulous or illegal breeding practices.

DAERA appointed an Expert Advisory Group in July 2025 to review the current legislation and provide recommendations for further legislative controls where evidence shows these are needed. The group was tasked with identifying any legislative gaps in existing provisions and considering the full range of relevant evidence from key stakeholders, as well as best practice from other jurisdictions, including internationally. They were asked to report on any additional provisions they felt necessary to improve the welfare of breeding dogs and their offspring in Northern Ireland and specifically directed to consider both physical and behavioural aspects of welfare associated with the breeding of dogs.

Between July 2025 and February 2026, the group met with a wide variety of stakeholders (see **Appendix 2**) and visited a number of licensed breeding establishments of differing sizes in Northern Ireland and England). Furthermore, the group reviewed relevant scientific evidence and conducted an extensive questionnaire survey of the veterinary profession in Northern Ireland to gather their views.

The group are extremely grateful to all those who engaged and contributed evidence to this review. What follows is the group's evaluation of the legislation and the welfare challenges / areas for possible reform that have been encountered. This evaluation has then informed a series of recommendations for DAERA to consider and which we hope will enable the

¹ 2016 Review of the Implementation of the Welfare of Animals Act (NI) 2011

² Naturewatch Foundation 'Licensed Dog Breeding in the UK and Ireland 2025' (April 2025)

Minister to progress future actions to address key issues and further improve animal welfare outcomes.

Overview of the legislative framework for regulating dog breeding in Northern Ireland

The overarching protection in Northern Ireland for the welfare of all animals under human control is provided by the *Welfare of Animals Act (Northern Ireland) 2011* ('the 2011 Act'). This prohibits causing any unnecessary suffering to an animal, whether by any act or by a failure to act, and imposes positive duties upon individuals who have animals in their care or control to ensure the welfare needs of that animal are met³.

Pursuant to the powers laid down by the 2011 Act⁴, additional regulations may be passed in order to secure the welfare of animals or their progeny. Subsequently, the *Welfare of Animals (Dog Breeding Establishments and Miscellaneous Amendments) Regulations (Northern Ireland) 2013* ('the 2013 Regulations') were passed to specifically regulate the activity of those who breed dogs on a commercial basis.

Under these regulations, a licence is required for a "breeding establishment" which is interpreted as one or more premises, within the same district council area, operated by the same person from which that person keeps 3 or more breeding bitches; and

- a) breeds 3 or more litters of puppies in any 12-month period;
- b) advertise 3 or more litters of puppies in any 12-month period;
- c) supplies 3 or more litters of puppies in any 12-month period; or
- d) advertises a business of breeding or selling of puppies⁵

Such establishments would need to comply with the conditions of that licence and the provisions contained in the 2013 Regulations.

In addition to the 2013 Regulations, and again pursuant to the powers provided by the 2011 Act, DAERA produced a Code of Practice for the Welfare of Dogs in 2016 ('CoP') which states that a person responsible for an animal must take all reasonable steps to ensure that the needs of that animal are met.

³ S.4 and s.9 Welfare of Animals Act (Northern Ireland) 2011

⁴ S.11 Welfare of Animals Act (Northern Ireland) 2011

⁵ S.2 The Welfare of Animals (Dog Breeding Establishments and Miscellaneous Amendments) Regulations (Northern Ireland) 2013

This centred around ensuring that the five animal welfare needs⁶ were being satisfied:

- 1) the need for a suitable environment
- 2) the need for a suitable diet
- 3) the need to be able to exhibit normal behaviour patterns
- 4) the need to be housed with, or apart from, other animals
- 5) the need to be protected from pain, suffering, injury and disease

Whilst the provisions of the CoP are not statutory, failing to comply with these would be taken into consideration in respect of any proceedings brought against a person for either an offence under the 2011 Act or the 2013 Regulations and therefore the provisions of the CoP do carry some weight.

Accordingly, anyone operating a Breeding Establishment in Northern Ireland must comply with the 2011 Act, the 2013 Regulations, and should follow the guidance set out in the CoP.

However, it should be noted that the CoP covers dog welfare in general and there is only minimal reference to breeding dogs and the welfare and care of puppies. In this regard, there is an important gap in guidance, as there is currently no dedicated code of practice on breeding dogs.

Whilst the 2011 Act and 2013 Regulations contain most of the legal requirements for dog breeders in Northern Ireland, there are additional statutory provisions contained in the *Veterinary Surgeons Act 1966* and the *Dogs (Licensing and Identification Regulations)(Northern Ireland) 2012* ('Microchipping Regs') which also impact upon the activities of dog breeders and which apply to all breeders regardless of whether they operate commercially or are hobby breeders/one-off breeders. Accordingly, whilst our report primarily focuses on reviewing the 2013 Regulations, other legislative provisions may also require some consideration where crossover occurs.

⁶ The Five Domains model for animal welfare were established by Mellor and Reid in 1994 and are now accepted as the model for assessing animal welfare and as superseding the previous Five Needs test. The Five Domains extends beyond the basic Five Needs by looking beyond the basic welfare needs of the animal and considering the requirements necessary for positive affective states. This includes assessing the (1) Nutrition, (2) Physical Environment, (3) Health, (4) Behavioural Interactions, and (5) Mental State necessary for an animal to have a "life worth living".

The 2013 Dog Breeding Regulations

As outlined above, these regulations apply only to those individuals operating a 'Dog Breeding Establishment' and who have therefore crossed the regulatory threshold for requiring a licence as a result of having three or more breeding bitches *and* by either breeding, advertising or supplying three or more litters of puppies in a 12 month period, *or* by advertising a business that breeds or sells puppies.

Whilst the 'three-litter' and 'three-breeding-bitch' rules are straightforward metrics to apply, determining if someone is 'advertising a business of breeding' is more complex and open to interpretation. There is no formal statutory guidance provided on how to assess this, and councils must use their own judgment on a case-by-case basis. There is widespread consensus that determining whether someone is operating a 'business' is difficult to interpret for both inspectors and breeders and there is general agreement across the range of stakeholders consulted that including this element in the licensing threshold test adds confusion and promotes inconsistency in application, resulting in many breeders erroneously falling outside of the licensing system⁷.

Individuals wishing to operate a dog breeding establishment must apply for a licence from their relevant district council. Upon receipt of the application, the council inspector will carry out an inspection of the premises and determine whether to grant the application and, if so, what specific conditions to attach to the licence. It is noted that currently there is no requirement for any veterinary oversight of the breeding premises inspection.

Licences are issued for a one-year period and the number of breeding bitches and any other dogs over the age of six months kept at the premises must be listed on the licence. There are no statutory minimum requirements in terms of a staff-to-dog ratio, and the statutory guidance simply states that the licence holder must provide "adequate and competent staffing". There is also no statutory maximum cap on the overall number of dogs that can be kept at a breeding establishment, and the individual council inspector has the power to set what they consider to be an appropriate cap for each premises that is licensed.

⁷ For further information, see: [Naturewatch Foundation, LIAIR Business test and dog breeding in England](#).

The regulations stipulate that breeding bitches must not be mated until they are over 12 months of age, can give birth to no more than three litters in any three year period (but must not be bred in any consecutive heat period), can give birth to no more than six litters of puppies in total and must not be mated after the age of eight years except where a veterinary certificate has been obtained. Puppies must be microchipped before eight weeks of age and must remain in the possession of the licence holder until at least eight weeks of age.

There is no statutory requirement to consider the suitability of a dog to breed in terms of their genotype, phenotype or state of health and the resulting implications that this may have for either the health and welfare of the breeding dog or for the health and welfare of the resulting puppies. The regulations are also silent as to how many caesarean sections a breeding bitch may undergo. An area we would consider important.

There are a number of baseline welfare conditions set out in the regulations concerning the provision of adequate accommodation, whelping facilities, a suitable diet, access to exercise and the existence of a socialisation and enrichment plan, as well as a requirement to maintain on-site records relating to the dogs kept on the premises and to the litters of puppies bred. However, little detail is provided by the regulations on the specific requirements of these provisions and, whilst the statutory guidance offers a little more detail in this regard, it is largely left up to the individual licence holder and council inspector to determine what systems to put in place in order to ensure the welfare needs of the animals in their care are adequately met.

The licence fee charges are set out in the regulations and are calculated on a sliding scale based on the number of dogs kept at the breeding establishment. Currently, there is no provision in the regulations allowing for licence fee levels to be revised or to even increase with inflation. Having an appropriate fee structure is important to enable councils to meet their obligations in terms of administering and enforcing the licensing scheme.

Enforcement of the regulations is tasked to the applicable district council where the breeding establishment is located and any offence committed pursuant to the regulations is dealt with on a summary basis with a maximum penalty of imprisonment for a term not exceeding six

months and/or to a fine not exceeding level five on the standard scale⁸ (prior to March 2015 the maximum fine was £5000 but this cap has been removed and now unlimited fines may be imposed).

Evaluation of the 2013 Dog Breeding Regulations to safeguard dog welfare and key recommendations for reform.

The 2013 Regulations provide the main bulk of legislative powers for the regulation of commercial dog breeding in Northern Ireland. There is a widely held view across the stakeholders we consulted that, as currently drafted, these regulations do not adequately serve to protect the welfare needs of breeding dogs and their puppies. In addition, animal welfare policy has moved beyond avoiding negative welfare to enhancing positive animal welfare to ensure animals have a life worth living.

Feedback to this group has raised significant concerns that dog welfare across many breeding establishments is poor. The particular areas of concern (where existing regulatory provision is inadequate or non-existent) are as follows:

1. Licensing thresholds
2. Numbers of dogs kept at breeding premises
3. Limitations on breeding: litter numbers / litter frequency / breeding ages
4. Veterinary oversight of breeding premises
5. Accommodation / kennel environment and exercise / enrichment for dogs
6. Staffing levels and expertise / training of staff
7. Specific provisions for safeguarding the welfare of stud dogs
8. Provision of socialisation programmes for puppies
9. Health testing / suitability to breed assessments for breeding dogs
10. Retirement protocol for breeding dogs
11. Controls on the sale / transfer / movement of puppies
12. Record keeping and traceability / monitoring
13. Licence fee structure and enforcement provisions

These topics therefore form the key areas that the group has explored and made recommendations on in more detail and as outlined in the following sections.

⁸ The “standard scale” of fines as per The Fines and Penalties (Northern Ireland) Order 1984 <https://www.legislation.gov.uk/nisi/1984/703/article/5>

1 – Licensing thresholds

The requirement to be licensed as a breeder is only triggered provided the breeder has three breeding bitches AND breeds, sells or supplies three litters of puppies in a 12-month period or advertises a ‘business’ of selling dogs. We consider that this threshold of three bitches and three litters in a 12-month period is overly generous and, together with the ambiguity caused by the ‘business test,’ currently allows too much scope for breeders to avoid the requirement to get a licence.

Due to weaknesses in monitoring / data collection, there are no reliable estimates of total numbers of puppies bred in Northern Ireland. Currently there are 52 licensed dog breeders in Northern Ireland who between them have almost 2,000 breeding bitches and collectively generate in excess of £26 million in annual revenue⁹. It is widely accepted that this is the tip of the iceberg in terms of the overall revenue generated from dog breeding in Northern Ireland and that substantial numbers of breeding bitches are currently kept by breeders without a licence when many of these should, in fact, be licensed.

In our view, **anyone breeding two or more litters of puppies in a 12-month period should require a licence and be subject to the statutory requirements for operating a dog breeding establishment**. The test should be based solely on numbers of litters of puppies per year to increase clarity and minimise confusion and the current specification concerning number of breeding bitches at the premises should be removed from the threshold test.

In terms of the ‘business’ element in the current provisions regarding the licensing threshold, we recommend also **removing this element** and adopting the approach that Scotland has taken in this regard which simply looks at litter numbers in a 12-month period for determining whether the threshold for licensing has been crossed¹⁰.

Whilst requiring anyone who has two litters or more in a 12-month period to obtain a licence would impose a higher burden upon breeders in Northern Ireland than in the other devolved

⁹ Naturewatch Foundation report on licensed dog breeding in the UK and Ireland 2025. Available at: <https://naturewatch.org/wp-content/uploads/2025/04/Licensed-dog-breeding-in-the-UK-and-Ireland-2025-by-Naturewatch-Foundation.pdf>

¹⁰ Sched 1. (14) of The Animal Welfare (Licensing of Activities Involving Animals) (Scotland) Regulations 2021

nations, we are of the clear view that the resulting direct benefits justify this action. Bringing more breeders into the licensing system would generate benefits to animal welfare as well as associated wider benefits to the public in general. There is an argument that bringing more breeders into the scope of licensing would beneficially level the playing field in terms of scrutiny, making the system fairer for all. Furthermore, it should ameliorate the unfortunate public perception that “licensed breeder” carries connotations of “puppy-farming.” In removing the grey area between very occasional / accidental breeding and commercial activity (and in combination with the registration requirements suggested for all litters), a lowered threshold would also help spotlight illegal unlicensed activity. Moreover, the additional fees generated from these licences could be used to supplement council resources enabling better oversight and enforcement.

2 – Numbers of dogs kept at breeding premises

There is currently no legislative cap on the maximum number of adult dogs that can be kept by a licensed breeder and, therefore, no limit to the number of dogs that could be attached to a licence. At present, it is left to the individual council inspector when carrying out the initial licensing check of breeding premises to determine an appropriate cap on a case-by-case basis in view of the size of the premises, staffing and general set up of the breeding facility. Whilst we see merit in allowing each breeding premises to be judged individually, we believe some statutory maximum safeguards should also be put in place to ensure that puppies are bred rather than farmed.

During our consultation process, we visited a variety of breeding facilities in terms of their size and scale and had the opportunity to observe dogs first-hand in a range of environments. We also consulted with a range of animal behaviour experts and those with direct experience of looking after breeding dogs, as well as reviewing relevant scientific literature on how environment and stress affect breeding dogs and their progeny¹¹.

Our own experience of visiting breeding premises aligns with the general view from across the range of stakeholders consulted, including the veterinary profession, that breeding facilities housing large numbers of dogs cannot feasibly provide for their necessary levels of behavioural or social needs. Enrichment, social / human interaction, and adequate exercise

¹¹ See AWC 2024, McEvoy et al. 2022, McMillan 2017

are important for dogs housed in any environments and it is our view breeding facilities containing large numbers frequently offer inadequate exercise and enrichment, and little access to meaningful human contact.

This view is echoed by the results from the survey we conducted amongst the Northern Ireland companion animal veterinary profession which showed that there is strong consensus for recommending a maximum cap in dog numbers. From our survey results, 93 out of 98 respondents answered the question about whether they would buy or advocate buying a puppy from a premises with more than 20 bitches, and 90 of them would not do so. 95 out of 98 respondents considered that there are ethical concerns around keeping breeding dogs under different conditions from those for which their offspring are intended – and of the 3 respondents who did not consider this an ethical concern, one of these respondents still replied that they would suggest breeding dog numbers be capped at a maximum of 5 dogs per establishment. Particular concerns were raised around lack of opportunities for human interaction as well as stimulation and exercise generally.

The 2013 Regulations are arguably sufficient to protect breeding dogs from the extremes of negative welfare, but it is the view of this Group they do not go nearly far enough in promoting positive welfare states. The Five Needs model for animal welfare has been superseded by the Five Domains Model which places importance on offering opportunities for animals to engage in activities providing positive experiences, rather than only avoiding negative ones. We do not consider it possible to adequately address all Five Domains of welfare (particularly the freedom to express natural behaviour and experiencing a positive mental state) at premises where high numbers of adult dogs and puppies are housed, even if higher welfare requirements were to be imposed and increased levels of inspection and enforcement provisions put in place.

In addition to feeding, grooming, having clean kennels and their physical health being maintained, each individual dog needs considerable time allocated to ensure sufficient levels of exercise and socialisation with other dogs and allow for enrichment provisions, including meaningful social interaction with humans. This requires a significant staff time commitment if each breeding dog is to get the individual attention they require for a positive mental state.

It is our observation and opinion that there are stressors inherent in large premises which cannot reliably be mitigated.

The first of these is the need for dogs bred as “companion animals” to be allowed to form solid human bonds. Dogs are fundamentally different to farmed livestock – through millennia of domestication they have been selected for precisely this ability (in most cases now a requirement) to form stable bonds with humans.

This requirement is strongly backed up by scientific literature. For example, studies have demonstrated harm where the human-dog bond has been absent, such as psychological collapse where dogs denied a human-dog bond during critical developmental periods develop a form of PTSD known as “kennelosis” and also risk developing “learned helplessness”. The latter is an extreme form of emotional shut down and a severe welfare issue, the risk of which rises as the number of dogs on a breeding establishment increases. Furthermore, positive interactions with a stable human figure have been shown to lower stress hormone responses in kennelled dogs¹². Functional MRI studies of dog’s brains have demonstrated stronger positive responses to bonded humans than to familiar dogs and even food¹³.

Suitable staffing ratios may mitigate some of the issues, but large numbers of rotating staff looking after animals who are not considered as individuals cannot replace the important human-dog bond which helps dogs to regulate emotion and avoid chronic stress and anxiety.

A further concern on large premises is persistent barking, often a vicious cycle of emotional contagion and resulting in chronic stress. In high-density kennel environments, a single ‘alarm bark’ can trigger a chain reaction across the dogs in the unit creating sustained periods of high-decibel noise from which dogs cannot escape. Research into kennel acoustics consistently shows that noise levels far exceed the thresholds recommended for human or animal safety. Studies have recorded sound pressure levels in kennels ranging from 85 dB (the threshold for human hearing protection in the workplace) to over 120 dB (a

¹² See McMillan (2017), McEvoy et al. (2022) and Animal Welfare Committee Report 2024

¹³ Berns et al. (2015)

chainsaw)^{14 15}. The study by Scheifele et al. (2012) showed hearing loss to all dogs who took part in the study and who were housed in a kennel environment for six months where decibel levels were routinely between 100 and 108dB. Further recent studies have concluded that due to the increased sensitivity of the canine ear, the average safe environmental sound level for dogs should be at least 20 dB less than is recommended for humans, which would be around 45 dB to 55 dB¹⁶.

Noise is a potent environmental stressor with chronic exposure leading to dogs' stress responses being permanently activated and "adrenal fatigue"¹⁷. Chronic exposure to stress hormones in the womb has a variety of detrimental effects on foetuses. In addition, once the puppies are born, they may be further impacted by spending their early development in high-noise environments – leaving them sensitised rather than habituated, and thus unable to cope with normal household noises (such as vacuum cleaners or doorbells), and prone to clinical noise phobia (fireworks and thunder).

One of the (partial) mitigations for exposure of breeding dogs to chronic stress is plenty of exercise and high-quality enrichment (see later comments). The lack of both has been observed in large-scale premises visited by the panel. In our opinion, any attempts to address this in legislation would be frustrated by the significant challenges for licensees in successfully implementing remedies at scale and for inspectors to verify and enforce.

Chronic stress is particularly undesirable in a breeding premises context. Baqueiro-Espinosa et al. (2024) found effects of maternal stress during pregnancy on the offspring, with subsequent implications for the welfare of the puppies. Consequently, high-volume facilities are producing puppies predisposed to behavioural problems¹⁰. For example, McMillan (2017) found a clear dose-response relationship between the lack of early-life stimulation and dogs developing into aggressive adults. The kennel environment often lacks the varied stimuli required for normal neurological development. Whilst there are other factors which may have contributed to the documented increase of dog-bite incidents in the last decade, there is a credible causal link between dogs from high-volume breeding facilities being inadequately

¹⁴ Sales et al. (1997)

¹⁵ Scheifele (2012)

¹⁶ Mak et al. (2022)

¹⁷ Coppola et al. (2006)

socialised and developing reactive/aggressive behaviour. This adds a compelling public safety argument to the animal welfare ones. In addition to this, there is also a consumer protection perspective. If consumers are to get the product they have paid for (i.e. a well-adjusted, happy and healthy dog), puppies require a good level of socialisation and exposure to a range of stimuli from a very early stage to prepare them for life in a family environment. It is therefore in the public interest to ensure that puppies get the social care and behavioural development they need. This involves being bred and raised in an environment conducive to this, where anxiety is minimised, ensuring that they can thrive in the life they are destined to lead. We do not consider that this is achievable within large scale breeding establishments.

Aside from the clear impact that poor socialisation and being reared in a stressful environment can have on the resulting puppies, consideration must also be given to the experience of the breeding dogs themselves who are kept, often for many years and a significant proportion of their lives, in these environments and how this impacts upon their welfare and well-being. Being housed in barren kennel environments with only the most basic of bedding, little to no enrichment and with only minimal opportunities to go outdoors (and even then, this access being confined to a small outdoor pen area and with no walks / ability to run on grass / olfactory stimulation / chance to play in groups) and little human interaction does not give dogs the opportunity they need to exhibit their full range of behaviours and to meet their welfare needs. Dogs are highly intelligent, sentient animals who thrive on social / human interaction and being confined to such an environment with minimal enrichment for years cannot and should not be regarded as acceptable from a welfare perspective. The group observed significant levels of behavioural anxiety, stress and stereotypical behaviour exhibited by dogs kept in these environments, with these signs being clear animal-based indicators of poor welfare.

It is doubly unfortunate that being kept in sub-optimal conditions also affects breeding dogs' ability to be successfully re-homed and integrated into a normal family / household setting upon retirement. Studies of retired breeding dogs from large-scale producers show significantly higher rates of psychological trauma, including compulsive stereotypical behaviours, persistent fear of strangers and an inability to cope with normal domestic life¹⁸.

¹⁸ McMillan et al. (2011)

Therefore, whilst we accept it may be possible to ensure the basic physical health needs of dogs within a large breeding facility are met, we do not consider that such an environment can adequately cater for the mental and behavioural needs of either the breeding dogs themselves or of the puppies that they produce, regardless of how well-equipped or well-staffed the premises might be.

Furthermore, keeping animals intensively has implications for infectious disease risk and control which is problematic for any species. Much of the guidance for dog breeding premises focuses on mitigating the spread of disease – primarily separating animals (in itself detrimental in a social species) and making facilities suitable for frequent and thorough disinfection. It is now understood that good hygiene is a delicate balance, particularly in neonates who should be developing an optimal gut flora and whose developing immune systems require regular exposure to non-pathogenic bacteria and other antigens from a variety of sources. It is difficult to see how this balance can be struck when rearing puppies on a commercial scale. In addition, when hygiene measures fail, we have seen evidence of breeders resorting to routine use of antibiotics in both bitches and puppies. Not only is this irresponsible antibiotic stewardship, but evidence is mounting that the resulting dysbiosis can cause a range of lifelong health problems in the puppies, including chronic bowel issues, allergic disease and others. Not to be under-estimated is the public health implication of such puppies shedding antibiotic-resistant bacteria in their new homes.

A final reason for recommending a cap is the practicality of monitoring and enforcing all the licensing requirements. We do not consider it possible that an inspector would be able to meaningfully assess whether the health, welfare, behavioural and socialisation needs of every single dog and puppy are being met when carrying out inspections at high-volume facilities – to do this effectively requires each dog to be assessed individually and for their behaviour to be monitored by the inspector. This is simply not practical or achievable in very large-scale premises.

As noted above, currently the decision on maximum numbers of dogs allowed at breeding establishments is subjective and made on a case-by-case basis and determined by the local council for the establishment. We support a partial continuation of this system and agree that each application for a breeding establishment licence needs to be looked at individually by local council inspectors (with a vet in attendance) to ensure that the appropriate number of

adult dogs is stipulated for that particular facility. However, we also recommend introducing a new maximum cap on total numbers of dogs which cannot be exceeded, irrespective of the size of the facility or any individual considerations. **In terms of the maximum cap on dog numbers, we recommend setting this at no more than 25 adult dogs (male or female) at any one time.**

Furthermore, to prevent people from attempting to circumvent this rule by setting up multiple premises **each with 25 dogs housed within each, a breeding licence should be limited to covering one premises/site and that multiple buildings/structures occupying the same site should be classed as one premises.** The licence holder must be the person responsible for the day-to-day operation and management of the premises, and therefore only one licensed premises should be allowed per licence holder. This is intended to prevent the use of proxy licence holders, i.e. those who have little or no meaningful involvement in the running of the premises, such as a spouse, relative, business associate or other connected party.

Whilst we recognise that such a cap on numbers would have a significant impact on those establishments who currently have more than 25 adult dogs on their premises, there are currently 21 licence holders in Northern Ireland above this threshold who would be affected by such a cap. Therefore, we believe that the significant benefits to the welfare for the dogs and puppies concerned, together with the additional wider benefits to public safety and consumer protection (including the reduction of costs incurred in vet fees for treating health and behavioural problems caused to dogs due to poor breeding) justifies the impact that such a cap would have on this very small cohort of individuals. In addition, any introduction of a cap on numbers could be ameliorated by providing suitable transitional arrangements to allow those affected to adjust their business models and downscale their breeding facilities. This could provide a welcome opportunity to focus on the quality of puppies produced rather than quantity.

3 – Limitations on breeding: litter numbers / litter frequency / breeding age

The existing limitations placed on breeding are that no bitch may be mated until she is at least 12 months of age, can only have three litters of puppies in a three-year period (but must

not be mated in consecutive heat cycles), can have a maximum of six litters in a lifetime and cannot be mated after eight years of age (except where veterinary approval is obtained).

In terms of the current minimum breeding age of 12 months, whilst we acknowledge that many other countries have also legislated that 12 months should be the minimum age and this generally would align with puberty maturity for a bitch, the science in this area has moved on and it is now accepted that skeletal maturity, which is rarely achieved before 18 months of age in small dog breeds and can take in excess of two years for large breeds, is the more appropriate benchmark to set for breeding age¹⁹. This approach is supported by the Royal Kennel Club (RKC) who recommend waiting until a bitch is two years of age before breeding from her²⁰. Whilst adopting a two-year minimum age for breeding would err on the side of caution in terms of ensuring skeletal maturity of the bitch, we consider that **increasing the minimum breeding age for a bitch from the current level of 12 months to 18 months of age** at the time of mating would be sufficient to safeguard the welfare needs of the dog and this approach would also mirror that of the higher level of licensing rules imposed under the English dog breeding regulations²¹.

The current provisions allow for three litters in a three-year period with the caveat that no bitch can be mated in consecutive heat cycles. Due to variations from dog to dog in heat cycle frequencies, this element of the current regulations is difficult to police as it would be hard for an inspector to prove whether or not a bitch has been allowed the required rest cycle in between being bred or not. We therefore recommend simplifying this requirement and adopting the same approach as the other devolved nations and specifying a time period between litters during which a bitch cannot give birth to a further litter of puppies. The English licensing regulations stipulate a 12-month period in this regard, and this approach has also been adopted in the Scottish and Welsh breeding regulations. We therefore recommend adopting this same approach in Northern Ireland, with **12 months between the date of the last litter and the next mating**.

¹⁹ (EFSA) et al. (2023)

²⁰ <https://www.royalkennelclub.com/dog-breeding/before-breeding/should-i-breed-from-my-dog/>

²¹ See <https://www.gov.uk/government/publications/animal-activities-licensing-guidance-for-local-authorities/dog-breeding-licensing-statutory-guidance-for-local-authorities> - guidance for higher standards to schedule 6 of the LAIA Regulations 2018

The current breeding regulations specify that a dog can have a maximum of six litters in a lifetime and should not be bred after the age of eight years. In view of our recommendation to raise the age at which a dog may have her first litter to 18 months and, assuming a litter-interval of 12 months is applied, we recommend reducing the current maximum number of litters in a **lifetime to a maximum of four litters**.

As noted above, the regulations are currently silent on how many caesarean sections a breeding dog may undergo before they must be retired from breeding. Giving birth in animals ought to be a natural process in as many cases as possible. It is unfortunate and ethically unacceptable that some dog breeds have been manipulated to the point where the ability to reproduce without human intervention is a rarity. Carrying out repeated caesarean sections removes the selection pressure for ease of birthing, with the latter being an important welfare consideration (Baqueiro-Espinosa et al. 2022). Caesarean sections also pose serious health risks and welfare issues for the breeding dog concerned (e.g. AWC 2024) and this is something that provision should be made for in the regulations. **We recommend that any dog who has required a caesarean section should not be bred from again**. Therefore, the regulations should state that the maximum number of caesarean sections permitted is one. This mirrors the higher standards imposed by the English dog breeding regulations²². We also recommend that it should be a requirement of the regulations that details of any breeding dog on a licence who has had to undergo a caesarean section should be recorded on the licence for the breeding premises and also ideally on the dog's individual dog licence and microchip.

4 – Veterinary Oversight of Breeding Premises and Inspections

Currently, there is no statutory requirement for any veterinary oversight during the inspection / application process for a breeding establishment licence and breeders are only required to seek veterinary advice where dogs show signs of disease, injury or illness. **We consider that the presence of a qualified independent vet with expertise in companion animal care and breeding, including behavioural welfare needs, should be a requirement for the first inspection of a breeding premises that a licence has been applied for, and also at each subsequent licence renewal check**. This would ensure an independent veterinary assessment of the breeding dogs at the premises to check their health and welfare as well as

²² Ibid

assessment of effective socialisation and enrichment protocols in addition to the appropriateness of the general kennel facilities. A key element of this inspection is that it would include animal-based indicators of welfare (e.g. Croney et al. 2019) and not just focus on resource-based indicators.

We witnessed evidence of blanket administration of unprescribed antibiotics, to whelping bitches and to puppies moving to their new homes. This represents not only a significant departure from correct antibiotic stewardship, but a likelihood of permanent damage to the puppies' developing gut flora and immune systems, and a recipe for developing antimicrobial resistance. Blanket use of quantities of anti-parasitic medications also has worrying environmental and resistance-generating implications. In addition, inappropriate use of oxytocin at whelping is another particular concern. Nearly 75% of respondents to the professional survey were in favour of veterinary oversight for all licensees, rising to 90% in favour for licensees with more than ten bitches. Specific concerns were raised that the oversight needed to be someone other than the prescribing vet.

All licence holders should be required to register with a named veterinarian who has oversight of general health status. In addition, there should be a requirement to ensure that any new breeding dogs who are added to the breeding premises during the term of a licence (i.e. in between scheduled inspection checks) have their health and welfare checked before being mated.

5 – Accommodation / kennel environment and exercise / enrichment for dogs

The current regulations impose baseline statutory requirements in terms of the accommodation provided to dogs and simply states that this must be “durable and appropriate” in terms of its construction, size, exercise facilities, lighting, ventilation, cleanliness and drainage and state that “adequate” clean bedding must be provided to dogs. In addition, bitches must be provided with a designated whelping area which includes a “suitable” whelping box / bed, with “adequate” heating and with a designated area within which the bitch can rest away from her puppies.

There is currently no statutory requirement for dogs to have exercise away from their sleeping / kennel area, no statutory provision for dogs to spend any time at all outdoors, no

requirement for dogs to have social contact with other dogs and no statutory minimum amount of exercise away from the kennel area provided.

A little more detail is given in the recommendations concerning accommodation in the statutory guidance but this, in our view, is still insufficient in terms of the scope and level of detail provided. The recommendations in the guidance have an emphasis on avoiding harm / negative welfare and focus on the provision of the basic welfare needs for dogs in terms of cleanliness, avoiding risk of injury, adequate temperature controls are in place, provision of appropriate light cycles, with little within the guidance to encourage breeders to go beyond providing for just the very basic needs of dogs and actively promoting their positive welfare.

There is a recommendation in the guidance for dogs to receive “sufficient exercise for their individual needs” and “if appropriate” with other dogs but this can include indoor or outdoor exercise areas and there is no recommendation that dogs must spend a period of time outdoors each day or have a set minimum amount of exercise / frequency of exercise. Breeders should be able to show that they have a written exercise plan for dogs but there is no guidance on what form this should take / how detailed it should be / what checks should be undertaken by inspectors to ensure it is being carried out or of any minimum expectations / requirements that should be included.

In terms of enrichment, the regulations again simply state that a licence holder must have a written enrichment programme for breeding dogs which is approved by the council inspector. The statutory guidance does give additional details on this point and provides examples of the types of enrichment that could be provided and the need for this in terms of the welfare benefits afforded to dogs. However, as these are only guidance and are not regulatory requirements, we have concerns that there is too much scope for the provision of enrichment to be basic or avoided altogether. We were concerned from visits we undertook during our consultation process to see numerous examples of dogs being housed in entirely barren kennel environments with no provision of toys / distractions to prevent boredom and very little opportunity to socialise with other dogs / humans or spend time away from their allocated kennel / pen. The dogs we saw in these environments showed clear indicators of anxiety, stress, and frustration, with their welfare needs not being met. In agreement with these concerns, not one of the 98 veterinary survey respondents would buy a puppy from a premises where the dams (mothers) were not regularly walked outside their pen.

We therefore consider there is too much scope for subjectivity in the interpretation of both the current regulations and the statutory guidance to them – too much is simply left to the individual breeder to decide what is “suitable,” “adequate” or “comfortable” and there is not enough defined statutory protection for dogs – especially with regard to their need to have access to outdoor areas / their need for set periods of exercise away from their kennel / sleeping area, and their need to socialise with other dogs. These elements should be addressed and provided for within the regulations themselves, and with better / more detailed information provided in the statutory guidance on how breeders should effect this. The Responsible Dog Breeding Guidelines endorsed by the EU Platform on Animal Welfare²³ provide a comprehensive range of evidence-based parameters for this. **We would strongly recommend that these guidelines (compiled by global experts in canine animal welfare science) should be used to inform a new Code of Practice for Breeding Dogs in Northern Ireland.**

6 – Staffing levels and expertise / training of staff

There is currently no statutory minimum staffing ratio provided in the existing regulations or, indeed, any mention of any regulatory staffing requirements at all – other than that licence holders must be over the age of 16.

The statutory guidance does outline some basic requirements regarding the provision of staff. These suggest that a fit, proper and competent person over the age of 16 is always present at the premises to observe and supervise the dogs and that adequate training for these staff, appropriate to the work they are required to carry out, should be provided along with a written training policy.

The guidance does not offer any direction on appropriate staff-to-dog ratios and simply states that “sufficient adequately trained staff should be available every day”.

Both the Scottish and English breeding regulations stipulate that sufficient staffing must be provided to ensure that all of the welfare needs of the animals can be met, but they do not provide a set minimum staff-to-dog ratio in the regulations themselves. The statutory

²³ Responsible Dog Breeding Guidelines (Endorsed by the EU Platform on Animal Welfare) (2020). Available at: https://food.ec.europa.eu/system/files/2020-11/aw_platform_plat-conc_guide_dog-breeding.pdf

guidance to the *Animal Welfare (Licensing of Activities Involving Animals; LAIA) (England) Regulations 2018* does recommend that a minimum of one full-time staff member for 20 dogs should be provided at all times (this is increased to a ratio of one staff member per ten dogs for those holding a 'higher' licence).

The "Animal Welfare (Breeding of Dogs) (Wales) Regulations 2014"²⁴ go further than this and provide a statutory minimum staffing requirement of one full-time attendant per 20 adult dogs or one part-time attendant per ten adult dogs. This is the minimum staffing level permitted under these regulations, and it is noted within the guidance to these regulations that this should not be regarded as the benchmark; council inspectors can and should impose higher staffing requirements on premises depending on the individual circumstances of each application.

The current status quo in Northern Ireland of leaving individual licence holders to decide on what level of staffing is 'adequate' is not acceptable and this should be addressed by imposing a statutory minimum staff to dog ratio. **In this regard, we would recommend a minimum requirement of one full-time qualified member of staff (including the licence holder) per ten dogs.**

Equally, the level of staff training requirements should also be provided. This is currently absent from both the 2013 dog breeding regulations and the statutory guidance, except the guidance states that licence holders should have 'a staff training plan' but with no indication offered as to what this should encompass.

Under the English breeding regulations, there is a requirement for staff to either hold a level 2 Ofqual qualification appropriate to their role or otherwise be able to demonstrate relevant experience sufficient for the role they are undertaking. The optional 'higher' licensing standards under the English licensing system require businesses to have a full-time, permanent member of staff with an appropriate level 3 Ofqual qualification. **We would recommend adopting the English 'higher' standards and requiring that either the licence-holder themselves or a full-time member of staff has an Ofqual level 3 or similar qualification in place.** Adopting this recommendation would also align with the

²⁴ S.8(2)(c) The Animal Welfare (Breeding of Dogs) (Wales) Regulations 2014

European Responsible Dog Breeding Guidelines which suggest that all breeders should be able to demonstrate competence in breeding dogs and puppy welfare, hygiene and disease control, first aid, welfare-centred dog handling and training, feeding and food preparation, environmental enrichment, dog behaviour, and an up to date understanding of breed-related disorders.

7 – Provision of specific regulatory protection of stud dogs

The current regulations do not provide any specific breeding protection for stud dogs, other than providing for the generic / basic welfare needs to be met in terms of kennelling, diet, and exercise. Furthermore, stud dogs are only currently captured by the regulations by accident. In that, if a breeder falls into the threshold requiring them to have a licence, i.e. they have the requisite number of breeding bitches / litters per year, then the licence covers *all* dogs kept at that premises and therefore the provisions for general care and welfare provided in the regulations would apply equally to stud dogs as they would to breeding bitches. If, however, a dog owner has multiple stud dogs which they use for breeding purposes and generate a fee from, there are no statutory protections for those stud dogs irrespective of how many dogs are kept, where they are kept, or how much revenue is generated from this. Concerns regarding the welfare of stud dogs were also raised in the recent Animal Welfare Committee (AWC) opinion on dog breeding (AWC 2024).

We consider that stud dogs also deserve regulatory protection and that they should not merely be regarded as being collateral recipients to protection under the current regulations if they are owned by someone who needs a licence due to the number of breeding bitches that they have.

During our stakeholder consultations, concerns were raised with us regarding welfare issues associated with overuse of stud dogs (both in respect of the dogs themselves and implications for subsequent breed health), ages that stud dogs are used from / until, and sires who have extreme conformations commanding high fees but having little or no health testing to assess their suitability to breed.

In our opinion, the regulations should provide a framework of protection for stud dogs which, similar to breeding bitches, provides a requirement for minimum and maximum mating ages

(we would recommend mirroring what we have suggested above with regard to breeding bitches and adopting a minimum age of 18 months and maximum age of eight years); suggests a maximum number of litters sired; allows for similar levels of enrichment, socialisation and exercise programmes; and also requires a breeder to consider the conformational and genetic health and risks to future progeny from heritable conditions that the sire may pass on.

In addition, similar to breeding bitches, adequate provision for the retirement of stud dogs also needs to be considered. Whilst many of these requirements may be possible to incorporate as guidance within a new dedicated Code of Practice on dog breeding, there will need to be some adjustments to the existing regulations to enable appropriate regulatory protection for stud dogs.

There should be consideration given to widening regulatory oversight to those owners who have stud dogs only, but do not have any breeding bitches (and therefore fall out of scope of the current Dog Breeding Regulations), and of bringing these into the licensing system depending on the numbers of annual litters sired.

8 – Provision of socialisation programmes for puppies

The current regulations do provide that all licence holders must have a written socialisation programme for puppies which is approved by their council inspector. This is the entirety of the statutory requirements imposed upon licence holders in this regard, and it is left to the licence holders to devise and implement what they consider to be a realistic programme of socialisation for puppies and demonstrate this to council inspectors. The 2016 Review of the Implementation of the *Welfare of Animals Act* in Northern Ireland highlighted this element of the regulations to be inadequate²⁵.

²⁵ DAERA (2016) Final report of the review of the implementation of the welfare of animals act NI 2011 <https://www.daera-ni.gov.uk/sites/default/files/publications/dard/final-report-of-the-review-of-the-implementation-of-the-welfare-of-animals-act-ni-2011.PDF>

The guidance²⁶ to the regulations does offer some further advice on this and provides a list of things / activities which a puppy should be exposed to at various stages of their development, but the guidance is very limited in its scope.

The Scottish dog breeding regulations offer more regulatory provision in this regard and go further than simply requiring the provision of a documented socialisation programme. They stipulate that all puppies must be given suitable and adequate opportunities to learn how to interact with people, dogs and other animals as well as being habituated to noises, objects and activities associated with a domestic environment.

As most puppies are destined to become family members and live in households, it is important that puppies are prepared for the challenges and the significant change that their new home environments will bring. This is not just in the best interests of the puppies themselves but also is of benefit to the members of the public who buy these puppies and who, having often paid significant sums for them, expect that the puppy they are receiving will have the basic levels of socialisation and habituation required to enable them to adjust to their new surroundings. There are also wider benefits to society in ensuring that all dogs get the best start in life and grow up to be well-adjusted and socialised.

From our survey of veterinary practices across Northern Ireland, a common theme from responses was concern amongst the veterinary profession around increasing levels of anxiety / reactivity and aggressive behaviour in dogs. Eighty-eight of the 98 respondents to the professional survey stated that anxiety levels and related disorders had significantly increased in recent years. This was attributed to a variety of causes (genetics, poor early socialisation, inexperienced owners, anxious owners, lack of training or stimulation, sleep disruption and COVID) but two-thirds thought that somewhere between half and the vast majority of anxiety-related disorders had a likely basis in genetics and early life experience and were therefore affected by breeding practices.

Whilst there can be a number of different factors which could account for behavioural problems arising in dogs, it is well established in scientific literature that both pre-natal and

²⁶ Northern Ireland Dog Advisory Group on behalf of Environmental Health (NI) (2011). Dog Breeding Establishment Licence Conditions and Guidance for Council Enforcement Officers.

early natal experiences play a large role in defining dog temperament. With dog bite instances on the rise in the UK and vets referring more and more dogs to behaviourists, it is important that breeders take responsibility in ensuring that these first pivotal weeks in a dog's development are carefully managed to give dogs the best start in life possible. In dogs the critical early life socialisation period occurs between approximately 3 to 12 weeks of age²⁷. It is imperative that breeders ensure puppies are appropriately exposed to a range of stimuli and experiences during this pivotal period to prevent future behavioural problems.

We consider that the statutory requirements of the Scottish dog breeding regulations are sensible ones and should be adopted in Northern Ireland's dog breeding regulations. We also recommend updating the statutory guidance on this area (and including this in any new Code of Practice on dog breeding) to provide more detail on what is expected of licence holders in this regard and to bring it more in line with current best practice and recent thinking on the socialisation of puppies.

9 – Health testing / consideration of a dog's suitability to breed

The current regulations make no mention of breeders being required to undertake any form of health testing or fitness to breed checks on their breeding dogs and the only mention of health is simply that a breeder must 'take all reasonable steps to protect dogs from pain, suffering, injury and disease'. This statutory duty appears to be limited to the breeding dogs only and would not extend to having a duty to safeguard the welfare of future progeny by assessing the breeding dogs in any pairing for genotypical or phenotypical conditions or conformational traits which are heritable and likely to be passed on to the resulting puppies.

The statutory guidance to the regulations²⁸ advises breeders should "make every reasonable effort to ensure both sires and bitches are in good health prior to mating" and this includes checking for the presence of genetically inherited conditions which could affect the health of the resulting puppies but as already noted, the guidance does not form part of the licence holder's legal obligations.

²⁷ McEvoy et al. 2022

²⁸ 7(6) Dog Breeding Establishment Licence Conditions and Guidance for Council Enforcement Officers.

This lack of regulatory protection for future progeny should be addressed and provisions included to ensure that the suitability of both breeding dogs is assessed to check for any heritable conditions or poor conformational traits that could reasonably be expected to be passed on to the resulting puppies and which would be likely to have an impact on their health or welfare.

The deliberate breeding of dogs to have extreme conformation traits, such as brachycephaly, is widely regarded as one of the biggest causes of health and welfare issues affecting dogs across the UK today with over 25% of dogs having at least one extreme conformation trait²⁹. A dog with an 'extreme conformation' is one whose physical features have been exaggerated to make them look a certain way through selective breeding techniques. Traits such as excessive skin folds on the face or body, lack of a tail or very shortened tail, shortened muzzle / flat-face, bulging eyes, shortened legs or elongated spines are all examples of extreme conformation characteristics. Many of these extreme characteristics have been popularised via social media and the media and are currently considered fashionable or 'cute' and dogs with these extreme traits can command higher prices due to the increased demand, which in turn fuels the supply.

However, many owners and members of the public are unaware that dogs with extreme conformations often have significantly increased risks of experiencing pain, suffering and lifelong health and welfare issues. These can include difficulty breathing, inability to exercise normally, joint and spine problems, eye conditions, unpleasant and painful skin infections, deafness and for some dogs a significant reduction in life expectancy. In addition, some dogs can also encounter difficulties in performing basic canine functions and behaviours such as self-grooming and being able to communicate with other dogs.

There is increasing evidence that living with these extreme physical traits and their associated pain and health issues has a major impact upon dog behaviour and temperament, giving rise to a greater incidence of anxiety and aggressiveness / reactivity in affected dogs.

In addition to direct animal welfare issues, the health consequences of extreme conformation breeding are also a source of emotional distress to owners and represent a significant

²⁹ <https://www.innatehealthassessment.org/news-updates-blog/Blog%20Post%20Title%20One-3zaa9-zlxng-8zplt>

financial burden. Costs associated with alleviating health conditions associated with extreme conformations can run into thousands, and pet insurance premiums are significantly higher for those dog breeds known to suffer from them.

In the most severe cases, veterinary interventions to rectify extreme conformations will not improve welfare sufficiently to allow a healthy and pain free life, and very sadly the only option left for these animals may be euthanasia. These are an emotional and financial burden that can be avoided if a responsible approach is taken to breeding and only those animals who have a genetically healthy physical conformation and suitable temperament are selected for breeding purposes.

Regulatory provision should be made to protect dogs and prospective dog purchasers from the risks associated with extreme conformation breeding. Both England³⁰ and Scotland³¹ have attempted to provide regulatory protection for this in their breeding regulations but, due to ambiguity in the drafting of these provisions coupled with poor levels of enforcement, they have had little impact in addressing the problem.

The perceived weaknesses with the English and Scottish provisions in combatting extreme conformation breeding practices stems from the use of ambiguous wording in terms of what a breeder's legal obligations are in this regard. In both cases, the wording used simply states a breeder must not breed from a dog where it could be 'reasonably expected' that harm could occur to either the breeding dog's health or welfare or the health or welfare of their offspring but provides scant guidance as to what this means. The use of the word 'reasonably' introduces a subjective element which allows breeders to hide behind often tenuous arguments that they did not 'reasonably expect' harm to occur and that they believe they took the 'reasonable' steps necessary to check the suitability of a dog to breed.

We recommend that breeders must be required to check that any breeding dog they use (whether male or female) is 'fit to breed'. The options for how a breeder should

³⁰ Schedule 6, condition 6, para 5 of The Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018 provide that "No dog may be kept for breeding if it can reasonably be expected, on the basis of its genotype, phenotype or state of health, that breeding from it could have a detrimental effect on its health or welfare or welfare of its offspring".

³¹ Schedule 6, condition 8, para 5 of The Animal Welfare (Licensing of Activities Involving Animals) (Scotland) Regulations 2021 has an almost identical provision to the one above contained in the English LAIA Regs save that they use the word "conformation" rather than "phenotype".

evidence this (in terms of either undergoing a full veterinary assessment or using any other approved health check/ assessment) should be listed in the accompanying statutory guidance to the new NI breeding regs. There is an opportunity for NI to lead the way in this area and to learn lessons from the existing legislation elsewhere. More than 95% of local veterinary professionals surveyed wanted to see an obligation similar to Schedule 6(6) 5 of the English Licensing Activities Involving Animals Regulations included in our legislation.

A further factor in the lack of success and enforcement of the provisions in the Scottish and English regulations is due to is a general lack of understanding on the part of breeders and licensing officers about the importance of breeding dog selection and what constitutes good innate health (i.e. a healthy conformation).

Much work has been done in recent years to try to raise public awareness of the health and welfare issues associated with extreme conformation breeding, and to provide breeders and licensing inspectors with an objective way of assessing breeding dog suitability.

The All-Party Parliamentary Group for Animal Welfare, in conjunction with the Royal Veterinary College, have recently developed and launched an Innate Health Assessment tool (IHA)³² for dogs. This is a visual assessment tool which checks any dog being considered for breeding for the presence of 10 of the most problematic extreme conformation traits from a welfare perspective. The IHA was launched in November 2025 as a voluntary digital self-assessment tool to aid breeders in making breeding choices and in selecting their breeding pairs. Importantly, the IHA can also be used by licensing officers as one of the monitoring tools available to them when carrying out inspections of licensed premises providing them with an objective means of verifying that the dogs selected by the breeder for use are suitable and that reasonable steps have been taken by the breeder to follow the regulatory requirements concerning suitability to breed and to meet their duty to consider any health implications for future progeny.

The IHA has received widespread support / endorsement from across the spectrum of veterinary professional bodies, animal welfare charities and Non-Governmental Organisations (NGOs), animal welfare enforcement bodies and the Royal Kennel Club

³² www.innatehealthassessment.org

(RKC). It has been endorsed by Animal Licensing Wales who have recommended their local authority licensing officers utilise it when assessing the suitability of breeding dogs during licensing checks, and it is hoped that it will also assist in bridging the gaps in the existing regulations in England and Scotland, providing an important lever to enforcement. The IHA is free to use and does not need any veterinary oversight. This tool and other similar approaches should form part of a holistic approach to assessment that also considers genetic conditions that may not be immediately externally visible to ensure breeders demonstrate compliance with their legal requirement to ensure a breeding dog is 'fit to breed'.

The RKC are also working on their own version of a test to check the conformation of a breeding dog which will be called the 'Nose to Tail Assessment'.³³ Similar to the IHA, this will again require breeding dogs to undergo a visual check / assessment of their conformation to check their suitability to breed. This is currently still in development by the RKC - it has yet to be trialled and very little detail has been released to date as to what the assessment process may entail but it may be that this is also a suitable option for inclusion in any list of approved health checks that a breeder could use to satisfy the 'fit to breed' requirement we are recommending.

In addition to considering the health and welfare of progeny from a mating, the breeder has a duty to consider the impact of breeding on the general health and welfare of the breeding dogs themselves. All breeding dogs should be checked by the breeder's registered veterinarian to ensure that they are suitable to breed from both a health and temperament perspective and without this causing any negative health or welfare impacts to themselves. This check should be carried out when the dog first arrives on the premises and be reassessed annually (possibly at the time of vaccination checks).

10 – Retirement protocol for breeding dogs

There are no specific statutory provisions covering breeding dogs who are no longer used for breeding save for the requirement to keep certain records relating to any sale or transfer of ownership of ex-breeding dogs. The English dog breeding regulations impose a statutory obligation upon licence-holders to make suitable arrangements for any dog who is no longer

³³ <https://www.royalkennelclub.com/about-us/resources/media-centre/2026/february/royal-kennel-club-reveals-2026-roadmap-to-a-new-future-for-dog-breeding>

required for breeding³⁴ and the guidance to this provision makes it clear that licence-holders must ensure any ex-breeding dog that they do not wish to keep themselves as a pet is rehomed to an appropriate environment. The guidance goes on to state that euthanasia of these animals must only be taken for health or behavioural reasons and the decision to euthanise can only be taken by a vet.

We consider that similar provisions and guidance should be introduced into the Northern Irish dog breeding regulations. Breeding dogs have finished their breeding career by the time they are seven or eight years of age (possibly much younger if they have experienced issues breeding or had a caesarean section) and therefore, depending on the breed and size of dog, have many years of life ahead of them.

If these breeding dogs have been adequately socialised during the time spent living as breeding dogs and have been provided with sufficient enrichment and opportunities to exhibit their full range of behaviours, there is no reason why they cannot successfully be rehomed and make excellent family pets who live out the remainder of their lives as companion animals.

There needs to be a regulatory onus placed on breeders to ensure that ex-breeding dogs are adequately prepared / socialised to enable them to be rehomed into a family environment. In this regard, the proposed cap on numbers of breeding animals would also help facilitate ensuring standards of care for breeding animals that promote their positive welfare and ensure they can successfully adapt to a home environment when they are retired.

11 – Controls on the sale / transfer / movement of puppies

This is an area which has been highlighted amongst stakeholders as being of paramount importance both in respect of tackling the illegal puppy trade / puppy farming and in building confidence amongst the public that puppies being sold are done so through legitimate channels and with the appropriate welfare safeguards in place.

The current regulations provide that no puppy shall be sold before the age of eight weeks of age and must stay in the ownership of the licence holder until at least then. Furthermore, the

³⁴ Sch 6, condition 6, para 11 of the Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2013

breeding regulations state that all puppies must be microchipped before eight weeks of age and therefore before they leave the possession of the breeding licence holder.

There is no provision currently though to prevent a puppy from being removed from their biological mother prior to the age of eight weeks and therefore, whilst a puppy may not be sold or ownership transferred before eight weeks, they could legitimately be removed from their mother / litter-mates and transported to another location owned by the licence holder, including to locations that may be outside of the jurisdiction by, for instance, moving the puppy to mainland UK.

As discussed previously, it is now well accepted that the first weeks of a dog's life are a critical time in a dog's behavioural development. The ability for a licence holder to take a very young dog away from their mother and transport them long distances to hold them in other kennel facilities is not in the best interests of the welfare of these dogs.

We would therefore like to see the addition of further regulatory provisions, similar to those contained in the Scottish breeding regulations and European dog breeding guidelines, which require that **puppies must not be permanently separated from their mother and may not leave the licensed premises from where they were born (either for sale, transfer or for any other reason) before the age of eight weeks other than to attend a veterinary surgery for treatment.**

We also note the absence of any requirement for prospective purchasers of puppies to view puppies in the presence of their biological mother. We consider this to be a vitally important element in both tackling the illegal puppy trade and giving confidence to members of the public that the puppy they are getting has come from a known source. Furthermore, if purchasers are required to visit the breeding premises (ideally more than once, see later) and view the mother of the puppy at the time of purchase, this could encourage breeders to ensure that high welfare standards are demonstrable.

Both the Scottish and English breeding regulations require that a puppy may only be shown to a prospective purchaser in the presence of their mother and from the premises where they are reared. Whilst we are delighted that the Minister is due to take forward legislation on the

sale of puppies and kittens, we consider that there is merit in also including these vital provisions within the revised NI dog breeding regulations.

12 – Record keeping, traceability and monitoring

The regulations provide that the licence holder must keep a record of various details including name / number of every breeding bitch including microchip number, date of birth, breed, mating details and details of puppies born. Details must also be kept in respect of breeding dogs held on the premises and any other adult dogs, and details of any new owner of a puppy or adult dog must be recorded.

It is left up to the licence holder to determine how to record this information in terms of whether this is in paper form or held digitally but they must make sure it is available for inspection for three years following the date of transfer of ownership or death of a dog and make this available to inspectors when asked.

We are mindful of not increasing the administrative burden on licence holders which might take them away from the task of actually looking after the dogs in their care. However, it would seem to us that systems could be put in place to capture records more accurately, whilst also streamlining the process to be more time-efficient for breeders. Software has already been developed enabling breeders to keep digital records of such things as they are required to record under the existing regulations (with the ability to share remote access to this with local council inspection teams in real time). These are designed to be easily updated with any new dog's details, further health information, details of any caesarean sections required, litter details of puppies and identification details of new owners and streamlining the process for everyone.

We therefore further recommend that a new centrally held registration system should be set up and that all breeders (including those who fall under the threshold for requiring a licence and breed fewer than two litters in a 12-month period) should be required to register every litter of puppies bred and to provide all relevant information concerning the litter to aid traceability and monitoring such as microchip numbers of the breeding dogs, litter size, microchip details of all puppies and the date and location where the puppies were bred. We

note, however, that this is ambitious and any consideration of this recommendation is medium / long-term in nature.

We acknowledge and welcome that the Minister has recently announced plans to move forward with the introduction of new legislation on the sale and supply of puppies and kittens, part of which would include a registration system for the sale, transfer or supply of puppies.

We strongly recommend that any legislation passed concerning this new registration system ensures that there is an onus placed on the breeder / licence holder to ensure they register any changes in ownership at the time of a puppy leaving their care, and to put in place appropriate penalties for failing to do so.

A framework for this already exists within the NI dog licensing system. Under current NI law it is an offence to take possession of a dog or puppy without previously obtaining a licence (or to supply a dog to someone who has not obtained a licence). The licence can be obtained up to 28 days before taking possession of the dog, which makes seeing the puppy (and its mother, and the premises as per Lucy's Law³⁵) more than once more likely and gives the new owner ample time to verify the credentials of the breeder and the registration of the litter. There are other obvious advantages to the inherent pause in preventing impulse purchases (see later).

We regard this as a key element in ensuring a holistic approach is taken to regulating dog breeding in Northern Ireland and see this as the perfect opportunity to create a central register for all dog breeding, recording the details of all breeders, litters of puppies born and their parents. This level of traceability would aid monitoring of total numbers of puppies being bred each year (currently there are significant gaps in data on this) as well as tying puppy microchip numbers to that of their parents and their breeder. This would be a useful tool for enforcement, enhance consumer protection, and also assist in flagging breeders who are breeding multiple litters without obtaining a breeding licence. **We would recommend that**

³⁵ "Lucy's Law" is the short-hand for the Animal Welfare (Licensing of Activities Involving Animals) Regulations which make unlawful the sales of puppies and kittens (under six months in both cases) by third party sellers/anyone other than the breeder. Lucy's Law currently applies only in England (2018), Scotland (2021) and Wales (2021) but similar legislation is anticipated for Northern Ireland later in 2026.

this register have a public search function to enable prospective purchasers to check the registration details of any breeder/ litter of pups they were considering viewing.

We have heard anecdotal evidence of breeders currently evading the requirement to get a licence at all or managing to exceed the maximum number of dogs specified on a licence by rotating dogs by moving dogs on/off the breeding premises when they are not being used for breeding and effectively hiding breeding dogs under the radar. We consider our recommendation for all adult dogs kept at a breeding premises to be individually listed and identified (i.e. by their microchip numbers) on the licence would significantly assist in circumventing this current problem. This would enable an inspector to ensure that the dogs at a premise are the actual ones listed against the licence and to make enquiries as to the whereabouts and welfare status of any dog listed which was not present at the time of an inspection.

Whilst the microchipping and licensing regulations do not form part of this group's remit, we consider that these could play a pivotal role in aiding the monitoring and enforcement of dog breeding welfare by ensuring adequate traceability of breeding dogs. We have heard evidence from multiple stakeholders that the current availability of a block licensing option (multiple unspecified dogs listed under one licence) is being used to provide a cover for breeding dogs to be kept at unlicensed premises. In our view, this ability to buy a block licence for dogs in the same household should be removed and all dogs should be required to have their own dog licence.

We acknowledge that the Minister has agreed to review the current microchip regulations as part of the Animal Welfare Pathway and this is very much welcomed. We have heard evidence from multiple stakeholders that the current system is not working well due to the presence of multiple microchip companies operating in the market and a failure to have a centralised online point of access to streamline the process of checking microchip details.

In addition, there are concerns that the data linked to microchips is so limited that it is of little use other than to help trace an owner when a pet is lost. The system has the potential to be put to far greater use in capturing other relevant health and welfare information (such as details of the original breeder of a dog, vaccination details and certain medical details such as history of caesarean sections, numbers of litters bred and chronic health conditions). This

information could aid in monitoring dog welfare, assist in enforcement, and ultimately provide useful data (e.g. longevity) reflecting the entire canine population.

Only 21 of 98 respondents to the professional veterinary survey thought that the current microchipping system is working as well as it could be. The most common suggestion for improving it was a central database for registrations. Various ideas were also put forward to improve compliance with microchipping, registration, and updating of information, ideally linked to the process of dog licensing. The suggestions included public education campaigns on the requirement for breeders to chip, more obvious evidence of compliance such as a collar tag, random public checks, incorporating chip numbers into farm paperwork for farm dogs, stopping internet sales of chips, and making registration by implanter mandatory. Not everyone who answered thought that extra information could (or should) be stored on the database for a chip, but a significant number (37) thought that the breeder details should be permanently kept.

We would also like to see any new registration system being linked to the existing microchip, dog licensing and breeding-establishment licensing systems so that, where sales / transfers are registered, the relevant microchip details, licence number and breeder details are recorded on this one system, and all of the information can be linked.

13 – Licensing fee structure and enforcement provisions

The current regulations set the fees to be charged by a council for licensing a breeding establishment and these are on a sliding scale depending on numbers of dogs kept at the licensed premises.

There is no ability for the council to charge anything further than the set fees as set out in the regulations, and also no index-linking of these to allow for inflationary adjustments to be made.

We have heard from consultation with council representatives that the fees currently charged are inadequate to cover the costs of issuing licences in terms of the inspection process, administrative requirements and then the ongoing monitoring and enforcement of licence conditions.

We recommend this be reviewed and, rather than setting out a fixed fee to be charged in the regulations, that power be given to councils to collectively decide the appropriate fees that should be charged for breeding establishment licensing. This should be decided by councils reaching a consensus on this together so that the same fees are charged across all of the councils, thereby providing consistency and transparency of fees across council areas. This would allow flexibility for annual increases to be agreed by councils to assist in the licensing, enforcement and monitoring costs whilst also ensuring additional costs, such as providing veterinary oversight of the inspection process, are met by the licence holder and that this burden does not fall on the councils to fund.

In terms of enforcement of the regulations this is the responsibility of the relevant district council. We have concerns about the quality and consistency of this, having heard and reviewed³⁶ stakeholder evidence of inspections that lack detail regarding the evaluation of the premises or dogs kept there compared with those used in other devolved administrations. We appreciate this may relate to challenges councils face with the current fee structure and administering the breeding regulations.

We recommend that all councils put in place procedures to ensure that the same format for inspection processes is being followed with a detailed inspection protocol provided to enable transparency and consistency in approach. The inspection forms should be sufficiently comprehensive and the inspection processes sufficiently robust to ensure that all aspects of the breeding establishment are thoroughly checked, and individual aspects are commented upon in detail. This involves assessing animal and outcome-based measures and cannot be reduced to resource-based assessments. All dogs kept at breeding premises must be properly evaluated from both a health and behavioural perspective as well as ensuring that adequate monitoring of the effectiveness of socialisation and enrichment programmes has taken place.

Furthermore, we have heard concerns about a lack of training and expertise in council staff allocated to carry out breeding establishment inspection processes. All staff connected with both the licensing inspection process and on-going monitoring of premises should be suitably

³⁶ The panel reviewed a substantial number of redacted inspection reports provided to them as a result of responses to FOIs submitted by the Naturewatch Foundation.

trained for this. We have recommended above that all licensed premises have a full-time, permanent member of staff with an appropriate Level 3³⁷ Ofqual qualification and we therefore consider that the council staff responsible for enforcement must have at least this same level of qualification if they are to be entrusted with assessing and monitoring breeding establishments.

We would recommend examining the approach the Welsh government has taken with their Animal Licensing Wales and consider building further upon this by exploring removing the task of overseeing licensing and enforcement of breeding establishments from individual councils and instead setting up a new centralised council led licensing team to oversee breeding licensing for Northern Ireland, including monitoring and enforcement. Aspects of the licensing process could still be dealt with by individual councils but under the overall responsibility and supervision of the new centralised team. The model in Wales has one local authority being the lead for this work. This centralised model would ensure that every breeding premises in every council locality is inspected and monitored by officers who have been suitably trained in companion animal welfare and behaviour. Thereby ensuring that these officers have the requisite knowledge and expertise to ensure that inspections are consistent, rigorous and always prioritise positive welfare, rather than under the current system where training and staff expertise varies from council to council.

³⁷ Most qualifications in England, Wales and Northern Ireland have a recognised difficulty level. Examples of a Level 3 qualification include: A/AS Level, national diploma/certificate, Level 3 NVQ (<https://www.gov.uk/what-different-qualification-levels-mean>)

Summary of Key Recommendations

1. LICENSING THRESHOLD CHANGED

New threshold for requiring a breeding licence to be set at 2 litters of puppies per year.

2. NEW MAXIMUM CAP ON NUMBERS OF DOGS AT BREEDING PREMISES

Introduction of a new maximum cap of 25 adult dogs per breeding premises licence with an additional requirement that there can be only one licence issued per premises / site and only one licence issued per named individual.

3. CHANGES TO MATING RULES

Minimum age for mating to be raised from 12 months to 18 months and new provisions requiring a gap of at least 12 months between the date of the last litter and the next mating. Maximum number of litters allowed in a lifetime for a breeding bitch to be reduced to 4 and no bitch may be mated if she has had a caesarean section – i.e. maximum of one caesarean section allowed.

4. REQUIREMENT FOR VETERINARY OVERSIGHT

An independent vet must be present at the initial breeding premises inspection and at subsequent licence renewal inspections. In addition, all breeders must be registered with a vet who should verify the health and suitability of any new dogs added to the licence during the term of the licence. Puppies should not be removed from their mother, nor moved off-site prior to 8 weeks of age unless this has been authorised by the breeder's veterinarian.

5. STATUTORY PROVISION OF SET MINIMUM LEVELS OF WELFARE

Updated regulations should include statutory minimum levels of exercise per day, socialisation and enrichment of dogs and puppies, in addition to set minimum requirements for housing and nutrition. More detailed provisions in relation to these to be provided in a new dedicated code of practice on dog breeding.

6. STAFF PROVISION

Minimum staff to dog ratio of 1 full-time staff member per 10 adult dogs. In addition, either the licensee or a full-time staff member must have a relevant Ofqual Level 3 or equivalent qualification.

7. REGULATORY PROTECTION FOR ACTIVE STUD DOGS AND RETIRED BREEDING DOGS

Enhanced regulatory protection for stud dogs, including for those kept on premises without breeding bitches plus new requirements for breeders to make suitable retirement provisions for ex-breeding dogs. Additional guidance on the welfare of stud dogs and retirement of breeding dogs should be provided in a new dedicated code of practice on dog breeding.

8. FITNESS TO BREED

Both parent dogs in a mating must be assessed to check their suitability to breed – both in terms of their own health and welfare and with regard to the likelihood of passing on extreme conformation or hereditary disease to offspring.

9. ADULT DOGS TO BE INDIVIDUALLY IDENTIFIED AND LISTED ON BREEDING LICENCE

All adult dogs kept at a breeding establishment must have their microchips recorded on the breeding licence. In addition, in order to further prevent a rotating substitution of dogs on the breeding licence, all the dogs on the breeding licence must have their own individual dog licence (i.e. not be on a block licence) which should be registered to the breeder / licence holder.

10. TRAINING OF ANIMAL WELFARE INSPECTORS AND FORMAT FOR INSPECTIONS

All inspectors who carry out licensing application checks and inspections at breeding premises must be suitably qualified and should hold a relevant Ofqual Level 3 or equivalent qualification in this regard. Furthermore, councils should utilise the same format for carrying out licensing applications and inspections and follow a standardised protocol for this. We recommend that a new centralised department to oversee breeder

licensing applications and checks be set up to ensure consistency and monitoring across councils in this regard.

11. PROCEDURE FOR SALE / TRANSFER OF PUPPIES TO NEW OWNERS

Puppies must only be shown to prospective purchasers in the presence of their biological mother and from the premises where they are reared. The new owner should be provided with information from the breeder to inform them about the care of the puppy. An awareness raising campaign should be used to remind breeders about the requirements for new owners to obtain a dog licence prior to taking ownership of the dog as per the existing licensing requirements in Northern Ireland and the need for updating the microchip ownership records at time of transfer to the new owner.

Conclusion

Canine companions have many well-documented societal benefits, and it is therefore important to facilitate an appropriate supply of healthy, well-adjusted, ethically sourced puppies as a public good. With this in mind, when considering our recommendations we aimed to find a balance between curtailing harms caused by unscrupulous or ill-informed breeders and avoiding unnecessary burdens on ethical ones. We need sufficient legislation and enforcement to defend welfare without discouraging the experienced and ethical hobby breeder, whilst also recognising that a knowledge gap can cause welfare problems on any scale. In any environment, husbandry must meet the needs of all five domains of welfare all of the time. Our recommendations have been informed by the published scientific evidence, and stakeholder consultations, including the views of the veterinary profession in Northern Ireland. With animal welfare as a core focus, they reflect wider policy shifts internationally that animal welfare is more than avoiding negative welfare states but importantly includes promoting positive experiences and states of welfare to ensure a life worth living and ideally a good life. At present, the existing legislation does not adequately safeguard animal welfare. Furthermore, this review has again highlighted the welfare issues associated with breeding for extreme conformation related traits, with recommendations made to help address this.

Northern Ireland has become a centre for high-volume dog breeding, with large numbers of dogs being produced each year, many for export to the UK and beyond. We are grateful to DAERA for establishing the Expert Advisory Group to review the existing breeding regulations and provide recommendations to inform legislative change that will enhance animal welfare. The panel also recognises the challenges around illegal dog breeding and our recommendations are aimed at reducing ambiguity regarding the threshold for requiring a licence while also providing advice to assist with enforcement and inspections.

At present we have a situation in Northern Ireland where deficient legislation and inconsistent enforcement have created a bad reputation for all breeders, demonising even the good ones. In addition to raising awareness with prospective owners as to what “good” looks like (and the lifelong, heart-breaking and expensive implications of “bad”), we need transparency and traceability so that they can choose wisely and therefore incentivise the very best practices. The Royal Kennel Club has acknowledged that “if governments were able to truly clamp down on poor breeding practices, it may motivate those who believe they could breed well as

it would create more space in the market for them to sell their puppies more easily”³⁸. Clamping down on bad breeding is in the interests of good breeders, dog-lovers, and ultimately the dogs themselves.

In addition, once the public can identify “bad” they should be encouraged to report it, rather than be tempted to “rescue” the puppy and perpetuate the problem. There needs to be clear signposting for reporting and then swift and effective enforcement. Too often the public are confused as to what the appropriate channels are for reporting animal welfare concerns and who to speak to about poor dog breeding practices³⁹. This is a further compelling reason to support our recommendation for a new centralised system to be put in place to oversee the activities of dog breeders. This would allow for better monitoring and traceability of the activities of dog breeders, provide prospective dog owners with an online hub for information and education and enable them to verify the registration and licensing status of a breeder. It would provide for consistency in approach across Northern Ireland in terms of how inspections and monitoring of dog breeders is carried out and facilitate better oversight of how investigations of poor welfare breeding are managed. By recommending a reduction in the permitted annual litter limit before requiring a breeding licence limited to two litters per year, more breeders will be captured by the breeding regulations and into the licensing system. This will ensure better consistency, oversight and monitoring of a large number of dogs bred in Northern Ireland every year who currently fall through the gaps and are unregulated. The welfare benefits for these dogs in obtaining regulatory protection would be significant.

Finally, by recommending that no breeder should have more than 25 dogs at their breeding premises, we are drawing a clear line in the sand between what we consider to be breeding dogs and that which amounts to farming them. Dogs have been domesticated to require social contact with humans as well as with other dogs. Therefore, how we care for and breed from them needs to reflect this. With the vast majority of dogs now purchased for the primary role of companionship they are typically regarded very much as part of the family for those households who own a dog and they occupy a special place in society – they have a place at

³⁸ RKC Report on The Reality of Responsible Dog Breeding, pg. 7 available at: <https://www.royalkennelclub.com/media/pgnmwvm/responsible-dog-breeding-report-1.pdf>

³⁹ See APGAW’s 2025 report on The Four Stages to Better Enforcement, available at: <https://apgaw.org/2025/12/08/the-four-stages-to-better-enforcement>

our tables rather than on our tables. To prepare them for the role that they are to fulfil, i.e. that of being a well-socialised companion and member of the family, dogs have a unique requirement to be socialised and raised in a way which equips them with the skills to live within a home environment. Dog breeding is therefore a societal issue, with existing deficits in our legislation resulting in a series of negative outcomes for prospective owners and dogs. Therefore, this review and our recommendations offer a timely opportunity for Northern Ireland to be at the forefront of ensuring dogs are bred in a way that both ensures their welfare and provides the public with a supply of companion pets that will enrich their lives.

APPENDIX 1 – REFERENCES

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APPENDIX 2 – STAKEHOLDERS CONSULTED

- Animal Licensing Wales
- Anonymous Organisation
- Association of Veterinary Surgeons Practising in Northern Ireland (AVSPNI)
- Causeway Coast Dog Rescue (CCDR)
- Department for Agriculture, Food and the Marine (DAFM)(RoI)
- Department for Environment, Food and Rural Affairs (DEFRA)(UK)
- Eurogroup for Animals
- Grey2kUSA Worldwide (Greyhounds)
- K9 Fertility Association
- Master Breeder Academy
- Mike Radford, OBE
- Monmouthshire County Council
- Naturewatch Foundation
- Northern Ireland Companion Animal Welfare Group (NICAWG)
- Northern Ireland Dog Advisory Group (NIDAG)
- North of Ireland Veterinary Association (NIVA)
- Pet Advertising Advisory Group
- Pets4Homes
- Purdue University- Professor Candace Croney
- Royal Kennel Club (RKC)
- Royal Veterinary College (RVC)
- Scottish Government
- Scottish Society for Prevention of Cruelty in Animals (SSPCA)
- Voice for Animal Welfare Fermanagh and Tyrone
- Welsh Government

Stakeholder Meetings

GROUP	1ST MEETING	2ND MEETING
Northern Ireland Companion Animal Welfare Group (NICAWG)	28/07/25	
Anonymous organisation	04/08/25	
Naturewatch	04/08/25	
Royal Veterinary College (RVC)	06/08/25	
Department for Environment Food and Rural Affairs (DEFRA)	08/08/25	
Welsh Government	08/08/25	
Eurogroup for Animals	27/08/25	
Master Breeder Academy	27/08/25	
Northern Ireland Dog Advisory Group (NIDAG)	27/08/25	13/02/26
Scottish Government	29/08/25	
VetNI / Association of Veterinary Surgeons Practising in Northern Ireland	17/09/25	26/11/25
Kennel Club	18/09/25	
Monmouthshire County Council	18/09/25	
Grey2kUSA Worldwide (Greyhounds)	24/09/25	
Purdue University	03/10/25	31/10/25
K9 Fertility Association	21/10/25	
Pet Advertising Advisory Group	24/10/25	
Scottish Society for the Prevention of Cruelty to Animals (SSPCA)	13/11/25	
Voice for Animal Welfare Fermanagh and Tyrone	13/11/25	
Pets4Homes	30/01/26	
Irish Government (Department of Agriculture, Food and the Marine; DAFM)	20/02/26	

Site Visits

SITE	DATE
Site visit to breeding establishment in Northern Ireland	02/10/2025
Site visit to breeding establishment in Northern Ireland	25/11/2025
Site visit to breeding establishment in Northern Ireland	25/11/2025
Site visit to breeding establishment in England	09/02/2026
Site visit to breeding establishment in England	11/02/2026

APPENDIX 3 – Expert Advisory Group Terms of Reference

Review of Welfare of Animals (Dog Breeding Establishments and Miscellaneous Amendments) Regulations (Northern Ireland) 2013 and consideration of regulation of canine fertility clinics.

Background

1. In Northern Ireland, commercial dog breeding regulations are regulated under the Welfare of Animals (Dog Breeding Establishments and Miscellaneous Amendments) Regulations (Northern Ireland) 2013.
2. The Welfare of Animals (Dog Breeding Establishments and Miscellaneous Amendments) Regulations (Northern Ireland) 2013 require that anyone wishing to operate a dog breeding establishment must first obtain a licence from the district council in which the establishment is located.
3. A dog breeding establishment is defined as one or more premises, within the same district council area, operated by the same person from which that person keeps 3 or more breeding bitches; and also, either:
 - breeds three or more litters of puppies in any 12-month period; or
 - advertises three or more litters of puppies for sale in any 12-month period; or
 - supplies three or more litters of puppies in any 12-month period; or
 - advertises a business of breeding or selling of puppies.
4. Activities that fall outside of this definition are commonly referred to as ‘Hobby breeders’. Hobby breeders (for example, a person who keeps only 1 or 2 breeding bitches) do not require a licence to keep a dog breeding establishment. Hunt clubs and charities are also not required to obtain a licence to keep a breeding establishment.

Purpose and Objectives

5. The purpose of the Expert Advisory Group (‘the Group’) is to carry out a review the ‘Welfare of Animals (Dog Breeding Establishments and Miscellaneous Amendments) Regulations (Northern Ireland) 2013’ (‘the Review’). The Group will be required to consider the existing provisions and whether there are any legislative gaps. It must also consider the full range of relevant evidence including that provided by key stakeholders and organisations, as well as best practice from other jurisdictions, including internationally.
6. The Review may also consider and report on any relevant additional provisions necessary to improve the welfare of breeding dogs and their offspring in Northern Ireland.
7. The Review must consider both physical and behavioural aspects of welfare associated with the breeding and selling of dogs.

8. The Group must also consider whether there is a need to regulate canine fertility clinics.

Approach

9. The Group will meet as many times as it deems necessary in order to complete the objectives, as outlined.
10. It is not within the sphere of activity of the Group to review how the Department currently licenses or regulates animal establishments (e.g. dog kennels) in Northern Ireland nor to make recommendations on any future licensing regime.
11. The Group will provide the Department with a report and recommendations by the end of 2025 following a six-month review period.
12. The report will be sent to the Minister for Agriculture, Environment and Rural Affairs and to the Chief Veterinary Officer. Following that, Veterinary Service and Animal Health Group officials will make recommendations to the DAERA Minister.
13. The report will:
 - a. make recommendations, where necessary, for amendments to the Welfare of Animals (Dog Breeding Establishments and Miscellaneous Amendments) Regulations (Northern Ireland) 2013;
 - b. make recommendations in relation to regulation of canine fertility clinics; and
 - c. make any other recommendations that the Group thinks relevant.
14. Secretariat support will be provided, as required, by Animal Welfare and Dog Control Policy Branch.

APPENDIX 4 – Expert Advisory Group Membership

Professor Gareth Arnott | Chair

Based in the School of Biological Sciences at Queen's University, Belfast, and with a focus on animal behaviour, cognition and welfare, Professor Arnott's research spans from fundamental behavioural ecology to applied animal welfare. He is the Academic Network Lead for the Animal Welfare Research Network, a member of the UK Government's Animal Welfare Committee, and serves as Editor for a number of journals and periodicals in animal behaviour and welfare.

Susan Cunningham

Ms Cunningham is a Cambridge-qualified veterinary surgeon with over 35 years' experience in small and companion animal practice in Northern Ireland and abroad. A past president of the North of Ireland Veterinary Association (NIVA) and the Northern Ireland branch of the British Veterinary Association (BVA) and was appointed a Member of the Order of the British Empire (MBE) in 2023.

Vanessa Barnes

A lawyer by profession who spent her early career in private practice as a solicitor, Ms Barnes now specialises in animal welfare law and policy and serves as legal adviser to the All-Party Parliamentary Group on Animal Welfare where she leads their review of dog breeding regulation in the UK. She holds undergraduate and master's degrees in law and a Post Graduate Diploma in Animal Welfare Science, Policy and Legislation and is also a member of the Legal Advisory Group on Extreme Conformation in Dogs.

Dog Breeding Review

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Department of Agriculture, Environment and Rural
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