

Consultation on Proposed Animal Welfare Policy Reforms in Northern Ireland

Written Response Template

About you

Q1. What is your name?

Helen Morrissey

Q2. What is your email address?

[morriseyh@belfastcity.gov.uk](mailto:morrisseyh@belfastcity.gov.uk)

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

Personal

Organisation

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

Belfast City Council

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

Yes

No



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

Yes

No

Not Applicable

POLICY PROPOSALS

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

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

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

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

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

REGULATION OF RESCUE AND REHOMING ORGANISATIONS

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

Yes

No

Comments

The Council supports the overall policy objective of improving animal welfare standards, increasing transparency and addressing gaps in the current unregulated rescue and rehoming sector.

However, where the licensing threshold is set at **more than five animals rehomed per year**, there is a risk that this may capture small-scale, occasional or ad-hoc rehoming activity that does not present the same level of risk as larger, organised operations. In the RIA it is acknowledged that there is a risk that the new regulation will place a burden on smaller organisations, potentially reducing rehoming capacity or leading to closure.

Council believes regulatory focus should be directed toward larger-scale rescue and rehoming organisations, where activity is more frequent, structured and potentially commercial in nature, rather than individuals undertaking infrequent rehoming in a domestic setting. This would minimise the risk of closures and a reduction in rehoming capacity and reduce the administrative and enforcement burden for the enforcing authority.

Whilst the Council agrees in principle with regulation of the sector, it is our view the proposed regulation more closely aligns with DAERA's current licensing functions of establishments such as boarding kennels, zoos and pet shops.

We are not in favour of becoming the enforcing authority. There is a strong case for the regulation of this sector by DAERA as this alignment would:

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

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

Council believe this option has not been fully explored and could easily be implemented within the existing frameworks either by authorisation under existing legislation and/or allocation of legislative powers to DAERA and setting up a centralised licensing team of all animal related establishments.

Animals rescued by rehoming organisations can have behavioural welfare needs and complex health needs, requiring veterinary treatment. Rescued animals are not solely companion animals and can include dangerous wild animals, wildlife or farmed animals, all of which are currently outside scope of Council's responsibilities and skill resource.

Council officers are not fully equipped to deal with a licensing scheme of this nature. We strongly believe it is advantageous for the presence of a DAERA qualified vet during annual inspections and in response to complaints, particularly in relation to licensing conditions such as enrichment, identification of signs of disease, administration of unlicensed medication. A similar recommendation for veterinary oversight was recently made by the Expert Advisory Panel following the review of Dog Breeding Establishment regulation.



Council is of the view that there has not been sufficient engagement with all councils, particularly in relation the Department's evidence about fees and associated costs should the Department continue with the assumed position that councils will become the licensing authority. The RIA notes the risk that licence fees may not fully offset councils' administrative and inspection costs, especially in areas with many or complex rescue and rehoming operations. We agree that councils could, or more likely would, be left with shortfall in income which could place additional strain on council budgets and resources potentially affecting the quality and frequency of inspections and enforcement.

We wish to remind DAERA that there were previous agreed positions between councils and DAERA during the consultation and implementation phase leading up to the implementation of the Welfare of Animals Act (NI) 2011 which did not include adding additional responsibilities upon councils in the future.

This Council is already operating our Animal Welfare Service in a financially constrained environment, following the withdrawal of the annual funding by DAERA in August 2023. Although we are encouraged by the questions raised about Animal Welfare funding by the AERA Committee on 16th April 2026, at present the full financial burden rests with ratepayers and additional enforcement obligations will add to this cost.

Belfast City Council currently employs 2 Animal Welfare Officers, 12 Dog Wardens and 2 Dog Warden Supervisors who are fully employed fulfilling current duties whilst operating in a prioritised and financially constrained manner. Their duties have recently been extended, by an additional category of dangerous dog, which has been challenging and complex. It was disappointing that DAERA introduced the XL Bully legislation without any additional funding for ongoing costs.

It must be stressed that any further intentions by DAERA to make councils responsible for future changes in Animal Welfare legislation, without adequate funding on an ongoing basis, will have significant financial implications for the Council.

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

Yes

No



Comments

The Council supports the overall policy objective of improving animal welfare standards, increasing transparency, and addressing gaps in the current unregulated rescue and rehoming sector.

However, where the licensing threshold is set at **care for** eight or more animals (five or more dogs) rehomed per year, there is a risk that this may capture small-scale, occasional or ad-hoc rehoming activity that does not present the same level of risk as larger, organised operations. In the RIA it is acknowledged that there is a risk that the new regulation will place a burden on smaller organisations, potentially reducing rehoming capacity or leading to closure.

We believe regulatory focus should be directed toward larger-scale rescue and rehoming organisations, where activity is more frequent, structured and potentially commercial in nature, rather than individuals undertaking infrequent rehoming in a domestic setting. This would minimise the risk of closures and a reduction in rehoming capacity and reduce administrative and enforcement burden for the enforcing authority.

Council would highlight the challenges in relation to foster caring arrangements within the rescue and rehoming sector. Foster caring is an essential component and any regulatory framework must recognise its unique characteristics. Without proportionate treatment, there is a risk of:

- Reducing fostering capacity;
- Driving activity underground; and
- Creating inconsistent enforcement.

The Department must ensure the regulatory framework explicitly addresses the following:

- Definition of “rescue and rehoming activity”;
- Whether foster homes are included directly, or regulated through a parent organisation;
- Treatment of independent individuals rehoming animals informally not part of an organisation.

We would reiterate that whilst the Council welcomes actions to improve animal welfare it does not agree that councils should be allocated responsibility for the licensing and enforcement of rescue and rehoming organisations.

It is our view the proposed regulation more closely aligns with DAERA current licensing functions of establishments such as boarding kennels, zoos, pet shops.

Council are not in favour of becoming the enforcing authority. There is a strong case for the regulation of this sector by DAERA as this alignment would:

- Promote consistency and clarity for operators and the public;
- Allow use of existing processes and expertise;



- Reduce administrative burden; and
- Improve enforceability.

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

Council believe this has not been fully explored and could easily be implemented within the existing frameworks either by authorisation under existing legislation and / or allocation of legislative powers to DAERA and setting up a centralised licensing team of all animal related establishments.

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was disappointing that DAERA introduced the XL Bully legislation without any additional funding for ongoing costs.

It must be stressed that any further intentions by DAERA to make councils responsible for future changes in Animal Welfare legislation, without adequate funding on an ongoing basis, will have significant financial implications for the Council.

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

Yes

No

Comments

Council reiterates that whilst we welcome actions to improve animal welfare we **do not agree that councils should be allocated responsibility for the licensing and enforcement of rescue and rehoming organisations.**

The licensing conditions should clearly define 'establishment', whether a single premises based model or if includes foster network. Whilst we agree with the proposed licence conditions in principle, the following comments should be duly considered:

General - **AGREE**

Animal Numbers - **AGREE**

However, the term "*must not exceed maximum that is reasonable*" is subjective and open to interpretation. It creates a risk of inconsistent enforcement and uncertainty for operators, suggest clear assessment criteria or indicative thresholds.

Staffing - **AGREE**

The emphasis on competence and training is welcomed, although it is recognised that some organisations may struggle with formal training polices and the cost of gaining qualifications.

Environment / Establishment – **AGREE**

Suitable Diet – **AGREE**

Enrichment / Handling / Protection from Suffering, Injury and Disease – **AGREE**

Rehoming – **AGREE**

We welcome the transparency in advertising and the provision of information to adopters.

Wild Animals – **AGREE**



However, the term “*if the release area is suitable for the species*” is open to interpretation, suggest clear guidance is provided.

Council notes that only 9 of the approximately 68 identified rescue and rehoming centres are ADCH Members and we would therefore dispute the DAERA assumption that many already meet Minimum Welfare and Operation Standards. This figure of 68 may be an underestimate, particularly if home based foster networks and independent rescuers are included.

We anticipate many organisations will be impacted by the licencing requirements and there could be a high level of non-compliance once the regime is introduced.

The proposed licence conditions, whilst well-intentioned in safeguarding animal welfare, may prove disproportionate for smaller and volunteer-led rescue organisations, particularly those operating foster care models within domestic settings.

Greater clarity is required regarding licensing thresholds, the status of foster homes, and whether responsibility rests with the overarching organisation or individual carers.

Additionally, clarity is needed on the setting of maximum animal numbers, the extent of enforcing authority discretion and the practicality of meeting premises-based requirements such as space, heating and isolation in non-commercial environments, alongside ensuring that enforcement officers have appropriate competencies to assess the standards consistently.

Impact Assessments

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

Yes

No

Comments

The consultation proposal reflects a concerning and growing trend whereby central government seeks to devolve enforcement responsibilities to local government without a corresponding transfer of resources, powers, or legal protections. Councils cannot continue to absorb additional responsibilities by default, particularly where they fall outside our core remit and expertise.

Council is of the view that there has not been sufficient engagement with all councils, particularly on the Department's evidence about fees and associated costs. Council therefore believes that any of the assumptions made on cost to the ratepayer which are based on the RIA are flawed and do not accurately address the potential budgetary implications.

The RIA significantly underestimates the time, staffing, training and compliance costs for both organisations and councils. Inspection and licensing activities are expected to require significant officer time. The estimate of staff costs of £20 per hour, including employer NI, pension etc. is a less than half the true cost. We also note a substantial underestimate of the impact of having to provide and maintain a public register. Any associated fees should provide full cost recovery for inspections, administration, data management and enforcement aspects, including additional staff costs. Fees set by individual councils can lead to inconsistencies.

The proposals will place substantial additional demands on councils, particularly on Animal Welfare Officers and Dog Wardens. Current officers are not fully equipped to deliver a new licensing regime of this nature and Council would not be able to deliver the proposed enforcement regime using our current resources.

Concerns include:

- Specialist knowledge gaps;
- Training requirements;
- Staffing implications;
 - Additional staff will be required
 - Potential need for higher-grade or specialist roles, leading to:
- Increased salary costs; and
- Workforce restructuring.

This has not been fully accounted for in the RIA.

We would also highlight the real concern for the perception of a conflict of interest of regulating a sector which councils rely heavily on for the rehoming of stray and unwanted dogs.

A further key concern is that the proposals may have unintended consequences for the sector, including:

Closure of smaller organisations:

- Due to cost, administrative burden, or inability to meet licensing requirements
- Particularly volunteer-led and rural organisations

Reduced rehoming capacity:

Councils rely heavily on these organisations to:

- Rehome unclaimed stray dogs
- Manage unwanted animals



Loss of capacity will result in:

- Increased kennelling pressures
- Higher costs for councils
- Potential welfare issues if animals cannot be rehomed promptly

Displacement effects:

Closure of regulated operators may lead to:

- Growth in unregulated or informal activity
- Increased enforcement challenges

A more robust evidence base is required before implementation as the current information available lacks a complete official picture of all rescue centres across the country. In the absence of a precise figure, it is difficult to apportion costs associated with inspection and licensing. It is also worth highlighting the huge rise in independent rescues, often unregistered and running from private homes without any formal charitable status.

In light of DAERA's previous cut to Animal Welfare funding, the additional duties will have a significant financial impact on councils implementing the proposals. A further detailed financial appraisal of the true costs associated with IT and Database systems, staffing, inspections and administration, and enforcement is required.

At present, it is difficult to see that setting a licence fee will be significant enough to recoup all administrative and enforcement expenses, without the local ratepayer having to subsidise the system. **It is our view that to be implemented effectively, any inspection and licensing regime will require a direct and sustained funding stream from DAERA.**

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

Yes

No

Comments

Rural and smaller rescue organisations may be disproportionately affected. Support, guidance and engagement from the Department will be important to maintain financial viability and to avoid unintended closures.



DOG LICENCE FEES

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

Yes

No

Comments

Dog licence income does not cover the full cost of licensing and dog warden services and current fees remain low compared with the general cost of dog ownership. A greater outlay would promote more careful consideration before making a decision to own a dog, aligning with the aim of promoting responsible dog ownership.

The proposed inflationary increases provide a modest rise in income but do not meet growing service demands, including enforcement linked to XL Bully legislation and proposed additional statutory responsibilities regarding puppies and kittens and dog breeding establishments.

As the majority of licences are concessionary or free this limits the ability for councils to close significant funding gaps. It is inevitable that costs will continue to rise and our capability to improve enforcement, achieve greater dog control compliance and public safety outcomes will be limited based on this modest increase.

Through NIDAG, councils have provided the Department with evidence of reflective costs of dog control services, including forecasting income estimates informed by Ulster University research.

Around 70% of dog licences are either free or concessionary (fee of £5.00). **Councils recommend the removal of the concessionary licence fee as current administration costs outweigh the licence cost, particularly where documentation / verification checks are required prior to a licence being issued.**

Council suggests an annual dog licence fee in the region of **£25** without concessionary discounts, would be considered reasonable, justified and provide full cost recovery to some but not all councils. If this was agreed the proposed £47.50 for a block licence would also have to be increased.

An automatic annual index-linked inflationary increase should be incorporated within the proposed legislative amendment so that councils do not have to wait for further review and legislative changes to allow for future increases.

Should DAERA be minded to retaining a concessionary element, we would favour a higher fee of £15.00, including a review of the award criteria. Retention of a reduced fee for dogs that have been neutered / sterilised is preferred, as it serves as an incentive to promote



responsible dog ownership, ultimately reducing the number of unwanted dogs. Council would also suggest a nominal fee for the current free licences which are often a significant proportion of licences.

Impact Assessments

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

Yes

No

Comments

The proposed inflationary increases would only provide a modest rise in income and do not meet growing service demands. Dog control services are resource-intensive and demand continues to increase, meaning councils are required to subsidise provision from general budgets.

A key structural issue within the current licensing model is the high proportion of licences that generate little or no income. In Belfast in 2025/26:

- 12% of licences were issued free of charge; and
- Just over 50 % were issued at a concessionary rate

This results in:

- A significantly reduced income base
- A mismatch between:
 - The number of licensed dogs
 - The funding available to regulate and enforce

The Department have failed to consider the limitations of full-cost recovery through licence fees under the existing structure.

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

Yes

No

Comments

BAN ON SPECIFIC AVERSIVE TRAINING DEVICES

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

Yes

No

Comments

Council is fully supportive of a ban on the use of handheld remote controlled electric shock collars on dogs and cats and would support the message that positive reinforcement, reward-based training should be employed.

Whilst we support a ban on the use of such devices, **a ban on the sale and possession of handheld remote controlled electric shock collars (E-collars) would be preferred.**

In addition, we would request that due consideration is given to implementing a legislative change, to facilitate the seizure of such devices, as well as an option to issue a Fixed Penalty Notice where an offence has been committed.

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

Yes

No



Comments

Council is fully supportive of a ban on the use of choke collars on dogs and cats and would support the message that positive reinforcement, reward-based training should be employed.

Whilst we support a ban on the use of such devices, **a ban on the sale and possession of choke collars would be preferred.**

In addition, we would request that due consideration is given to implementing a legislative change, to facilitate the seizure of such devices, as well as an option to issue a Fixed Penalty Notice where an offence has been committed.

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

Yes

No

Comments

Council is fully supportive of a ban on the use of prong collars on dogs and cats and would support the message that positive reinforcement, reward-based training should be employed.

Whilst we support a ban on the use of such devices, **a ban on the sale and possesion of prong collars would be preferred.**

In addition, we would request that due consideration is given to implementing a legislative change, to facilitate the seizure of such devices, as well as an option to issue a Fixed Penalty Notice where an offence has been committed.

Impact Assessments

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

Yes

No



Comments

While option 3B appears to offer the most proportionate and practical approach to improving animal welfare, enforcement is likely to be difficult without legislation an option to issue a Fixed Penalty Notice where an offence has been committed.

The absence of powers to seize devices used unlawfully could also hinder enforcement and render enforcement disproportionate to other dog control offences. Potential confusion may occur in distinguishing prohibited devices from visually similar but lawful alternatives, creating practical challenges for compliance and enforcement.

A ban on the sale and possession of specific Aversive Training Devices would be preferred.

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

Yes

No

Comments

STRENGTHENING MICROCHIPPING REQUIREMENTS FOR DOGS

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

Yes

No



Comments

We see no role for councils in enforcing this requirement.

Council have no objection to a requirement to notify change of details within a specified timeframe. The notification period should however be practical and realistic for dog owners to comply with, 14 days is reasonable, suggest between 21 - 28 days maybe more appropriate. The obligation should remain with the owner, without creating unnecessary bureaucracy.

Imposing an arbitrary statutory timeframe could prove to be impractical and difficult to enforce, resulting in inconsistent, disproportionate and costly enforcement action for a relatively minor offence.

NIDAG informed DAERA in 2023 and more recently in 2025, of council officer views for regulation of microchip database providers, to facilitate a smaller number of centrally operated databases available in one search location.

NIDAG called for the exploration of the setting up a single point of entry to query existing multiple real time databases. The facility to enter a microchip number into a single web-based portal that could check all microchip databases would minimise the need for a manual search and increase efficiency.

Q20. Do you agree that the owner must indicate if they are / are not the breeder of the dog?

Yes

No

Comments

We see no role for councils in enforcing this requirement.

Council has no objection to this requirement. However, we would see no role for councils in enforcing it. It is our view that it is the responsibility of the implanter to record and provide breeder information (if known) at the point of microchipping

The requirement for an owner to declare their status if they are / are not the breeder on a database will assist with traceability but only if the breeder information has also been recorded and remains a 'secondary' contact. This could facilitate councils tracing back to potential unlicensed breeders and inform targeted interventions.



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

Yes

No

Comments

We see no role for councils in enforcing this requirement.

Council has no objection to this requirement. However we see no role for councils in enforcing it. Councils already require and record microchip details as part of the dog licence application process and enforce non-compliance with licencing requirements.

Council also recognises that microchipping before 8 weeks may not be appropriate in some cases, for example where a puppy is a very small breed, has a health condition, or where implantation could cause an adverse effect. Exemptions should therefore remain available for such circumstances, subject to advice and agreement following consultation with the Northern Ireland Veterinary Association.

Impact Assessments

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

Yes

No

Comments

We see no role for councils in enforcing these requirements.

If councils were obligated to enforce these requirements, there would be significant financial and resource impacts on councils to **ensure** compliance in relation to the estimated 180,000 un-chipped dogs in NI.

The RIA acknowledges significant data gaps and does not address the costs to councils in terms of enforcement activity associated with estimated high levels of non-compliance particularly in the absence of Fixed Penalty Notices and the likely expectation of the public to enforce. Any action taken by councils must be appropriate and proportionate, in line with existing Enforcement Policies. The inability to offer a Fixed Penalty Notice, would not align with our enforcement response to other more significant dog control offences.



Council would stress that the RIA is not robust from a council service delivery perspective and does not quantify council enforcement burdens, despite the major operational implications, which include the requirement to:

- Check compliance at the point of licensing;
- Investigate non-compliance (no chip, outdated details);
- Follow up changes within 14 day requirement;

and the likely increase in legal proceedings and repeat enforcement visits.

The proposal assumes existing staff can absorb the work and this is not the case. The Council reiterates there will be a need for additional staff, in both administrative and enforcement roles.

The RIA also fails to account for public engagement, increased reporting and an initial surge in activity.

This adds to the growing trend of additional new enforcement duties without additional funding or mechanism to fully recover costs.

Whilst the Council supports the objective of improving traceability, the RIA does not adequately reflect the operational and financial burden on councils. In particular, the absence of staffing, IT, administrative costs and quantified enforcement presents a significant gap. The proposals assume improved outcomes without recognising the scale of current non-compliance or the resource required to achieve behavioural change.

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

- Yes
 No

Comments



CALL FOR EVIDENCE ON MICROCHIPPING OF CATS

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

- Yes
 No

If Yes, please answer Q25 below.

Q25. Is your cat microchipped?

- I have one cat, it is microchipped.
 I have one cat; it is not microchipped.
 I have more than one cat, none are microchipped.
 I have more than one cat, some are microchipped.
 I have more than one cat, all are microchipped.

Q26. What benefits, if any, do you think the microchipping of pet cats could bring?

Please provide any evidence, data or examples to support your views.

Councils have no role in the ownership, traceability and identification of cats.

In general, Council agree that the microchipping of cats assists with the traceability and identification of 'owned cats'. Where owners keep their details accurate and up to date, databases play an important role in reuniting these animals with their owners. Council officers recognise microchipping may assist in reuniting lost cats with owners, help identify cats involved in traffic accidents and assist in identifying former owners where cats have been abandoned.

However, we believe the objectives can be achieved without the imposition of a mandatory legal requirement to microchip cats, through the promotion of overall responsible cat ownership led by DAERA, including promoting the health and welfare benefits of microchipping, neutering and vaccination to owners.

Other interested stakeholders such as Cats Protection and similar animal charities are best placed to deliver such campaigns with the appropriate level of funding from DAERA and supported by councils.



Q27. What challenges, if any, do you think the microchipping of pet cats could bring?

Please provide any evidence, data or examples to support your views.

Councils have no role in the ownership, traceability and identification of cats.

Council has identified a number of challenges associated with requirement to microchip pet cats, including:

- Ensuring owners regularly update ownership details, including changes to contact information when rehoming.
- Fees are often charged by database providers for registering and updating microchip records.
- The absence of a central database. Multiple databases currently hold animal microchip records, making access more complex. Council would welcome tighter regulation of database providers to support a smaller number of centrally operated systems, available through a single search point. In the interim, closer working relationships with existing providers would help ensure a more consistent approach to accessing information.
- Potential risks associated with implantation.

There are also a number of challenges, specifically from a council service delivery perspective:

- Microchip data has limited evidential value, as it does not conclusively prove ownership.
- The free-roaming nature of cats makes it difficult for councils to establish a 'pet cat', resulting in challenges in determining whether enforcement action for non-compliance is appropriate.
- Effective record keeping and the use of existing, or cost to upgrade, IT systems.
- The absence of a Fixed Penalty Notice option for what may be regarded as a relatively minor offence, creates a risk of inconsistent, costly and disproportionate enforcement under the proposed framework.
- In the absence of proportionate enforcement tools, councils would bear the financial burden of any prosecutions.
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We believe the objectives can be achieved without the imposition of a mandatory legal requirement to microchip cats, through the promotion of overall responsible cat ownership led by DAERA, including promoting the health and welfare benefits of microchipping, neutering and vaccination to owners. Other interested stakeholders such as Cats Protection and similar animal charities are best placed to deliver such campaigns with the appropriate level of funding from DAERA and supported by councils.



Q28. What do you think might present a barrier for cat owners to microchip their pet cats?

Please provide any evidence, data or examples to support your views.

Due to the current cost of living crisis the responsibility of microchipping a pet cat through vets and the costs incurred would add an undue burden to individuals, especially where there are households with multiple cats.

In a rural areas the inconvenience in terms of proximity to a Veterinary Practice or other microchip provider is likely to be a barrier. It is acknowledged that some cat owners may have concerns around the potential risks of microchip migration, complications at the time of implantation, or of pain or stress caused to their pet.

Some owners may also have concerns that vets, rescue and rehoming shelters, councils etc, may fail to proactively scan lost cats for microchip details and therefore see no benefit in microchipping their cat.

If contact details change, owners are likely to have additional costs to update the microchip database.

Q29. Are there any other challenges that should be considered, in relation to mandatory microchipping of pet cats?

Please provide any evidence, data or examples to support your views.

Whilst Council agrees microchipping of cats would assist in the circumstances highlighted, we question the effectiveness and proportionality of a mandatory microchipping requirement.

We believe this objective can be achieved without the imposition of a mandatory legal requirement to microchip cats, through the promotion of overall responsible cat ownership led by DAERA, including promoting the health and welfare benefits of microchipping, neutering and vaccination to owners.

It is our view, that it is more appropriate to fund other interested stakeholders such as Cats Protection and similar animal charities to deliver 'wrap around' widespread education programmes supported by the provision of cat neutering / spaying vouchers. This engagement approach is much more appropriate and proportionate than immediately moving to a regulatory enforcement regime for cat management.

We see no role for councils in the enforcement of any mandatory microchipping of cats. Councils are not resourced, skilled or equipped to deal with the management / control of cats and would not have the capacity to take on an additional enforcement responsibility. It is our view the microchipping of cats should be placed with an interested stakeholder.

It is also recognised, there is not the same rationale for the mandatory microchipping of cats as there is for dogs, i.e. control of stray dogs, protecting public safety etc, This does not apply to the same extent, or in the same way, to cats as free roaming animals, or their



owners. Cats are free-roaming animals and owners / responsible persons could easily deny responsibility for un-chipped cats.

Before considering the introduction of mandatory microchipping for cats, the issues relating to separate microchip databases also need to be addressed.

Council officers are of the view that enforcement should not be a main focus in relation to cats, rather an appropriate stakeholder could be supported and tasked to deliver guidance and education initiatives in schools and communities to promote responsible cat ownership.

Council believes the mandatory requirement would be unworkable, as there is no clear mechanism to distinguish between feral and unowned cats and pet cats. Attempting to enforce microchipping in such circumstances would be impractical.

Council strongly believes that mandatory microchipping in respect of cats would pose enforcement difficulties given the behaviour traits of many cats in roaming, establishing territories and moving between several 'owners' in many cases. It would clearly be difficult to manage public expectations and protect the reputation of the service, where enforcement action is not considered to be in the public interest.

Councils should not be viewed as an existing enforcement body for cats simply because they operate long standing and financially supported enforcement for dog control – which in itself is not self financing but rather is supplemented by the ratepayer.

It must be stressed that any further intentions by DAERA to make councils responsible for future changes in Animal Welfare legislation, including mandatory microchipping of cats without adequate funding on an ongoing basis, would have significant financial implications for the Council.

It is the view of the Council that the microchipping of cats should be placed with an interested stakeholder.

Council budgets are already under significant pressure, and officers must continue to prioritise other Animal Welfare duties, including enforcement of the recently introduced XL Bully legislation, which requires substantial officer time.

As noted in relation to dogs, there is no single centralised database that council officers can readily access, resulting in time-consuming checks across multiple databases to confirm whether a microchip is registered.

Council remains of the view that cat microchipping would be better delivered through a centralised or charitable framework, rather than imposed on councils without the tools, officers and financial resources needed to enforce compliance.



Q30. Are there any other challenges, including for any other type of cats, which should be considered?

Please provide any evidence, data or examples to support your views.

Any requirement for feral cats to be microchipped would be unworkable, as there is no clear mechanism to distinguish between feral and unowned cats. Attempting to enforce microchipping in such circumstances would be impractical.

For feral cats we support the Trap – Neuter - Return approach by interested stakeholders which is more beneficial for animal welfare than microchipping of feral cats.

Council would also highlight that there should be exemptions included within the proposed legislation to cover a situation a pet cat has a medically certified health condition.

Q31. Is there anything else you would like DAERA to consider on this issue?

Please provide any evidence, data or examples to support your views.

We believe the objectives can be achieved without the imposition of a mandatory legal requirement to microchip cats, through the promotion of overall responsible cat ownership led by DAERA, including promoting the health and welfare benefits of microchipping, neutering and vaccination to owners.

Other interested stakeholders such as Cats Protection and similar animal charities are best placed to deliver such campaigns with the appropriate level of funding from DAERA and supported by councils.

For feral cats we support the Trap – Neuter - Return approach by interested stakeholders which is more beneficial for animal welfare than microchipping of feral cats.

In addition, other alternatives include visible identification such as collars with contact details, tattooing, or voluntary local registration schemes.

Written responses should be sent to:

E-mail: animalwelfarepolicy@daera-ni.gov.uk

Postal address: Animal Welfare and Dog Control Policy Branch

Department of Agriculture, Environment and Rural Affairs (DAERA)

Jubilee House

111 Ballykelly Road

Ballykelly
Limavady
BT49 9HP

Closing Date for Responses is Tuesday 30 June 2026.



Department of
**Agriculture, Environment
and Rural Affairs**
www.daera-ni.gov.uk

An Roinn
**Talmhaíochta, Comhshaoil
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