

## **PUBLIC CONSULTATION ON PROPOSED NEW RULES FOR SALE AND SUPPLY OF PUPPIES AND KITTENS IN NORTHERN IRELAND – LUCY’S LAW**

### **RESPONSE FROM THE ULSTER FARMERS’ UNION**

22<sup>nd</sup> August 2025

#### **Introduction**

The Ulster Farmers’ Union (UFU) is the largest farming organisation in NI representing almost 12,000 members. UFU membership encompasses farmers from all sectors across NI and from all farm sizes, reflecting the diverse nature of the agricultural sector in NI.

The Lucy’s Law consultation is of interest to UFU as the proposed measures will affect members who keep, breed, or sell puppies and kittens, and will have implications for animal welfare and traceability in Northern Ireland.

The UFU welcomes the opportunity to respond to the proposals. Our primary concerns are as follows:

- The Expert Advisory Group on dog breeding work is still outstanding
- The publicity of the register
- The principle of, and uneven execution of, registration fees
- Communication of legislation to stakeholder and wider public generally
- Sale from birth location only
- Potential for increased euthanasia including inhumane euthanasia

#### **Expert Advisory Group on Dog Breeding**

The UFU has a strong interest in these proposals, and we believe that the breeding of dogs and cats should be developed through a joined-up, coherent, and evidence-based approach. As such, we are concerned that advancing this consultation before the Expert Advisory Group on Dog Breeding, also established by Minister Muir to provide specialist advice on dog breeding, has completed its work and published its recommendations. Without considering potential legal changes surrounding breeding as brought forward by the Expert Advisory Group, there exists a risk of creating duplication, inconsistency, or potential conflict between the differing strands of policy. On this basis, we do not feel like we have complete information by which to respond to this consultation comprehensively.

#### **Publicity of Register**

The UFU does not support the proposal for the Register of Sellers and Suppliers of Puppies and Kittens to be publicly accessible. While we recognise the intention to promote transparency and deter illegal breeding, we believe that publishing personal names and addresses risks creating privacy, safety, and security concerns for legitimate breeders and sellers, particularly those operating from private residences and farms.

This could expose individuals to harassment, theft, or other unwanted contact, and may deter compliance with the registration system. Instead, we believe that access to the register should be limited to the relevant authorities relating to its enforcement, such as local councils, DAERA or the

PSNI. This would allow for effective regulation while safeguarding the privacy of responsible breeders and sellers. Publishing personal details could also expose breeders to targeted activism, and individuals operating from farms or private homes may be at risk of unwelcome protests, harassment, or pressure from activist groups.

The UFU would be supportive of exploring alternative ways to provide reassurance to the public, such as a system where individuals are able to verify whether a breeder or seller is registered without disclosing sensitive personal information. This is part of striking a balance between transparency for buyers and the rights and safety of those who operate legitimately.

### **Registration Fees**

The UFU notes that registration fees are proposed, which are applicable for private individuals following the first year of registration, and for businesses from the first year of registration. These fees will be set by individual councils based on full cost recovery.

The UFU concerns in this area are twofold. Firstly, a universal fee which applies for everyone in order to register serves as a de-facto tax on all breeders and sellers, including those acting in good faith and already maintaining high welfare standards, thereby imposing an unnecessary burden on responsible individuals and businesses. Further, leaving the setting of this fee to individual councils, without a uniform standard or an indication at the consultation stage of the potential amounts involved, risks creating significant disparities across council areas and generating uncertainty for stakeholders. We are unable to respond to the fees fully as we have no indication on any fee structure or range.

### **Communication**

The UFU has ongoing concerns surrounding poor communication from DAERA with stakeholders and members of the public. If new legislation is introduced that implements such radical changes to the existing regime, it is essential that DAERA ensures a robust and clear communication strategy is put in place to explain the requirements, responsibilities, and implications for breeders, sellers, and buyers clearly.

Failure to provide accurate communication that targets those affected risks creating confusion and non-compliance. Communication must therefore be proactive and consistent across all council areas. Additionally, a clear point of contact within DAERA should be available to address queries and provide clarification. Without this level of support, there is a risk that responsible breeders will be unfairly disadvantaged while those who operate illegally may continue to avoid any scrutiny.

### **Sale from Birth Location**

The UFU notes that any sales of puppies and kittens under 6 months of age have to be sold from the registered birth location regardless of time or reason of sale.

UFU want to raise whether this will limit owners to only being able to surrender puppies or kittens to rehoming centres or veterinary surgeries. If this is the case, there could be significant health or welfare implications for the animals involved.

There are many legitimate reasons why an owner may need to surrender a puppy or kitten under 6 months of age after purchase, such as family member allergies, emergency situations (family illness, family death, house fire, or property issues), as well as general problems such as not bonding with the animal as easily as expected. However, in a lot of circumstances, the animal may be put into a better situation if they could be rehomed in a personal manner, for example through legitimate breed specific

channels (for example, ‘for the love of greys NI’, a sighthound community network which assist with finding homes for unwanted/surrendered sighthounds) or through family word of mouth. This avoids the need for the animal to be passed through a rehoming centre.

The key socialisation period for puppies is the first three to six months. Rehoming centres, especially in Northern Ireland, are often overpopulated, and whilst most rehoming centres do a good job of ensuring the health and welfare of animals in their care, staff members do not have time to dedicate to proper socialisation of young puppies, which could have long term negative effects on their training and behaviour and subsequently leave the animal in a worse position later in life. Whilst we understand that there needs to be a way to ensure the animal is not placed in a potentially dangerous home, there needs to be another option for rehoming an animal from a secondary location.

### **Potential for Increased Euthanasia**

If animals are only able to be rehomed at a rehoming centre, cannot be sold through the correct channels, or if the owner feels unable to get a licence, then this may increase euthanasia for no beneficial reason. Veterinarians see an increase in owners bringing in animals for euthanasia due to being unable to keep the animal, and this could increase if rehoming centres are overstocked, unable to take extra surrenders, or if the owner does not feel a rehoming centre is the best option for the animal.

### **Farm Cats and Kittens**

The UFU wants to ensure that there is awareness about farm cats and kittens. On occasion, there can be large numbers of unwanted kittens on a farm due to feral farm cats, or stray animals, breeding on a farm site. These animals are likely unneutered, and in a lot of situations, these kittens are then given to other neighbouring farms as ‘pest control’ through word of mouth i.e. discussed at marts, farm veterinary practices, etc. If Lucy’s Law was to come into play, this would complicate the sale/transfer of these farm kittens due to needing licences and information on the mother. This may increase the use of inhumane euthanasia of unwanted kittens, where farmers may not see the need to apply for a licence or not want to pay the fee. A potential for an exemption for unwanted kittens used for pest control on farms could be beneficial for the welfare of these animals.