

Response to Non-Statutory Public Consultation on the Department of Agriculture, Food and the Marine's next Animal Welfare Strategy for the period 2026 to 2030

Date: 02 January 2026

Dear Sir / Madam,

We, the undersigned, founders of **Dog Law Ireland**, comprising of solicitors Hannah Unger, Demi Mullen, and Carrie McMeel, write to provide our response to the Non-Statutory Public Consultation on the Department of Agriculture, Food and the Marine's (the "**Department**") next Animal Welfare Strategy for the period 2026 to 2030.

Our response focuses exclusively on dog welfare in Ireland, where our expertise lies. More information about Dog Law Ireland and our accolades can be found at www.doglawireland.ie.

Initial Observations

- The consultation sets out that *"The new Animal Welfare Strategy will need to align appropriately with the Department's high-level long-term objectives in relation to animal welfare as referenced in the Department's Statement of Strategy as well as Programme for Government priorities in the area of Animal Welfare"*. However, the current Statement of Strategy is for the period 2023 – 2026. If the current Statement of Strategy is coming to its conclusion in the coming year, it seems nonsensical for the next Animal Welfare Strategy (which will run to 2030) to have to align with it.
- It would have been helpful for the Department to provide a comprehensive review of the current Animal Welfare Strategy 2021 – 2025 (the "**current Animal Welfare Strategy**") so the public is aware how effectively it has been implemented in practice ahead of responding.
- We are slightly disillusioned by this exercise given the recent public consultation on surgical artificial insemination in greyhounds. Although launched on 18 June 2024 the results were not published until 20 November 2025 and despite showing 99% support for a ban, no ban has yet been implemented. This approach appears inconsistent with the "Working in Partnership" theme of the current Animal Welfare Strategy and undermines confidence in transparent, democratic policy-making. We trust this consultation will be managed differently.

Animal Welfare Strategy Document & Themes

We suggest the following improvements:

1. The **core themes / principles** identified in the current Animal Welfare Strategy are still relevant, however, we suggest including three additional principles:
 - i. *"Protect Animals, Protect People"*¹
 - ii. *"Promoting responsible ownership for companion animals"*
 - iii. *"Prevention, early intervention, and proactive enforcement"*

In relation to **point (i)** above, a significant body of research shows that there is a strong link between the abuse of animals and the abuse of people². Naturewatch Foundation note that: *"When animals are harmed, people are often at risk too. Recognising and responding to that connection is essential — across legislation, the criminal justice system, and safeguarding. When we take animal cruelty seriously, we're also protecting families, strengthening communities, and preventing further harm"*. We believe that the Government can utilise this to make the next Animal Welfare Strategy more effective in a way that **protects both animals and people**.

¹ <https://naturewatch.org/campaigns/protect-animals-protect-people/>

² <https://thelinksgroup.org.uk>

In relation to **point (ii)** above, Ireland's Animal Welfare Strategy must evolve to reflect the changing landscape of companion animal ownership and welfare. Pets play an important role in many people's lives with a quarter of Irish households owning one or more dogs³. While dogs remain a major focus due to persistent challenges such as abandonment and illegal breeding, horses and other domesticated pets face equally pressing issues. A modern strategy should not only ensure high welfare standards throughout these animals' lives but also **actively promote responsible ownership**. This means providing clear guidance, education, and enforceable safeguards so that owners understand and meet the physical, behavioural, and social needs of their pets.

In relation to **point (iii)** above, the long title of the Animal Health and Welfare Act 2013 emphasises the prevention of cruelty as a core objective. In practice, however, the operation of animal welfare law in Ireland appears largely reactive rather than preventative. Enforcement mechanisms often tend to be triggered after significant harm has already occurred, frequently following public complaints, media exposure, or intervention by charities. There is limited publicly available evidence of proactive inspections, early intervention, or systematic risk prevention across sectors. As a result, the stated objective of preventing cruelty may not be fully realised in practice, and animal welfare protections can function primarily as a response to suffering rather than as a framework designed to prevent it. The next Animal Welfare Strategy should therefore consider how **prevention, early intervention, and proactive enforcement** can be strengthened as central elements of effective animal welfare governance.

2. The UK's most recent '**Animal Welfare Strategy for England**'⁴ breaks down their strategy by type of animal, provides an overview of that specific area, their overall objective and then provides an overview of how that objective will be delivered detailing the specific actions. This is a far better publication than our current Animal Welfare Strategy. It allows the strategy to be measurable, which is something our current Animal Welfare Strategy lacks.
3. Specific goals should be clearly outlined in the strategy document. While we appreciate that the nature of the strategy is to be "*overarching in nature*" and not to be "*highly prescriptive or overly detailed*", the five key strategic principles and actions on page 26 of the current Animal Welfare Strategy, along with the Key Action Areas⁵ are insufficient. Moreover, the Programme of Government commitments in the Statement of Strategy Appendix align with its goals rather than the themes or principles of the Animal Welfare Strategy. This appears somewhat disjointed and confusing.

Specific Suggested Reforms

We have set out our specific suggested reforms below and used the **five key strategic principles**⁶ from the current Animal Welfare Strategy as subheadings in red to assist the Department in knowing where the reforms could potentially fall under.

- I. General reforms
- II. Reforms relating to dog breeding
- III. Reforms relating to dog welfare
- IV. Reforms relating to dog control
- V. Ban on low welfare practices

³ [FEDIAF-Facts-Figures-2025.pdf](#)

⁴ [Animal welfare strategy for England - GOV.UK](#)

⁵ [DAFM AWS 2021-2025 - THEMES and ACTIONS.pdf](#)

⁶ (1) Working in partnership, (2) Science and evidence led policy making, (3) Improving education and knowledge, (4) Consistent approach to evaluation and assessment, (5) Effective regulation

I. GENERAL REFORMS

Working in Partnership

1. Centralising Policy Development

Ireland's current approach to dog welfare, dog control, and dog breeding is fragmented, with policies and enforcement mechanisms operating in silos. This lack of integration undermines efforts to address the dog welfare crisis effectively.

While we appreciate the establishment of the Advisory Council on Companion Animal Welfare and the Dog Control Stakeholder Group, we believe that the welfare of dogs is intrinsically linked to the breeding and control of dogs and therefore would have liked one group to review our dog welfare framework holistically. This is especially the case given that all dog welfare related advances seem to have been paused pending the outcome of these groups' work. For example, the review of the Dog Breeding Establishments Act 2010 and the review of the Control of Dogs Act 1986 appear to have fallen off the Autumn 2025 legislative agenda and on top of that, the work of these groups are often cited as the rationale for holding off on progressing dog / animal welfare related matters.

We recommend that the next Animal Welfare Strategy adopts a unified framework that brings dog welfare, dog control, and dog breeding together under one coherent policy structure.

2. Establishing an Independent Regulator

The EU Proposal for a Regulation of the European Parliament and of the Council on the Welfare of dogs and cats and their traceability (the "**EU Proposal**") is expected to enter into force in 2026. Once the relevant provisions take effect, a 'competent authority' from each member state will be required to do a number of things such as:

- Maintain a register of dog breeding establishments.
- Establish and maintain a database of microchips that is interoperable with other member states databases.
- Inspect breeding facilities.
- Ensure training courses are made available to breeders, approving the content of courses, certifying that the breeders have completed the courses.
- Prepare information campaigns re stray dogs, neutering, legal obligations, caring for animals, etc.
- Authorising inbreeding for certain circumstances (e.g. limited gene pool).

Given Ireland's unenviable title as '*puppy farm capital of Europe*' and the dire need to reform dog control, establishing an independent regulator should be very high on the Government's list of priorities. In addition to the above, the independent regulator's statutory remit could cover anything connected to dog welfare, dog control and dog breeding, similar to the South Australian Dog & Cat Board⁷, including (inter alia):

- Educating the public on things like dog bite prevention, children and dogs, responsible dog ownership etc.
- Facilitating research, developing policies, procedures, guidelines relating to dog control, dog welfare etc.
- Overseeing the work of the Department and local authorities when it comes to dog breeding and dog control, etc.

⁷ [Plans and annual reports | Dog and Cat Management Board](#)

3. Ensure Consistency in Policy and Procedure across Local Authority Pounds

We need to implement national policies and procedures for the running of our local authority pounds as well as the licencing and oversight of dog breeding establishments. For example, many local authority pounds have different euthanasia policies or have no policies at all. Some use social media to help rehome their dogs, while others do not. Some do not rehome to the public, while others do. This is not sufficient. All pounds should be subject to certain uniform policies and procedures such as (i) euthanising only where absolutely necessary and following effective review and oversight; (ii) utilising social media effectively for rehoming; and (iii) making all best efforts to rehome dogs in their care.

We are also concerned by the fact that, while it does not appear that any day to day practices have changed in terms of dog control or dog breeding, they are still being managed by local authorities which no longer employ any local authority veterinarians⁸. The Government should set out how this gap is being addressed at local authority level.

4. Animal Welfare Grants Programme

Approximately €20million was awarded to the greyhound racing industry this year, which pales in comparison to the total of €6.4 million split between 94 animal welfare charities in 2025. The funding provided under the Animal Welfare Grants Programme needs to increase exponentially, particularly given the fact that the Government is allowing such excessive breeding which directly feeds into the requirement for such funding. Until the Government is able to effectively control the number of dogs being bred in Ireland, the animal welfare organisations picking up the pieces should be effectively supported.

The Animal Welfare Grants Programme needs increased transparency and the public need to understand the process by which it is decided how much funding goes to each applicant. Of note, from 2023 – 2024 there were practically no changes to funding for each applicant, which seems non sensical given the activities of the applicants would have changed.

We also believe that the priority areas for allocation of funding⁹ need to be reconsidered and activities relating to inspection and enforcement by Authorised Officers should be funded separately to the Animal Welfare Grants Programme.

We would also query whether raising public awareness in relation to responsible pet ownership and the prevention of abandonment or surrender of animals to charities, through education or public engagement is best placed to sit with animal welfare organisations. It would be good to understand what kind of review the Government has undertaken to satisfy itself that this is the best mechanism for the provision of “*education to the public on animal welfare and guidance to prevent welfare problems in the future*”¹⁰ and also how they review the effectiveness of this method of education. In lieu of such a review, the independent regulator (once established) should provide a national education programme on these issues.

⁸ <https://www.agriland.ie/farming-news/e7-7m-transferred-to-dafm-for-local-authority-veterinary-services/>

⁹ Activities that:

- raise public awareness in relation to responsible pet ownership.
- prevent abandonment, or surrender of animals to charities, through education, public engagement and community outreach services such as neutering, trap neuter return services or veterinary care support.
- rehome animals in a responsible manner.
- demonstrate active rehoming of animals rather than long term sanctuary care.
- relate to inspection and enforcement of animal welfare legislation by officers authorised under the Animal Health and Welfare Act 2013.

¹⁰ <https://www.gov.ie/en/department-of-agriculture-food-and-the-marine/press-releases/minister-heydon-announces-an-increased-allocation-of-64m-in-grants-to-94-animal-welfare-charities/>

In light of the current animal welfare crisis and the significant number of stray / abandoned dogs in Ireland, we believe that the priority areas for allocation of funding to dog rescues should mainly relate to rescue, rehabilitation and rehoming.

5. Dog Services / Working Dogs / Dogs in State Custody

Dog services, including dog grooming businesses, boarding kennels, daycare facilities, and similar services can give rise to animal welfare considerations if standards are not maintained. These services do not appear to be subject to a uniform regulatory framework with consistent, welfare-focused inspection standards across sectors.

There is limited clarity and consistency around the training, accreditation, and welfare oversight of assistance and service dogs including guide dogs, autism assistance dogs, search and rescue dogs, and others. Despite their vital public role, no uniform statutory framework governs training standards, welfare safeguards, or ongoing monitoring once dogs are placed with users. Oversight largely depends on voluntary standards and organisational policies, leaving welfare throughout working life and retirement without consistent regulation.

The Northern Ireland case involving “Bailey”, a dog placed in HMP Magilligan Prison, highlighted the absence of a clearly articulated and consolidated policy framework governing the treatment and safeguarding of animals used or held by State bodies. Similar considerations may arise in Ireland in relation to animals used by State bodies, and warrant examination within an animal welfare strategy context. Animals are used by the State in a range of contexts, including policing, border control, customs and revenue enforcement, search and rescue, detection work, and detention settings. The use of animals by public authorities raises distinct welfare, safeguarding, training, and oversight considerations, including the standards applied during deployment, handling, housing, rest periods, veterinary care, and retirement, as well as the clarity and consistency of policy frameworks governing animals used in State functions.

The next Animal Welfare Strategy should consider these areas.

Improving Education & Knowledge

6. Education

Education is one of the core themes / principles from the current Animal Welfare Strategy. We believe that a number of specific areas of education need to be addressed in relation to dog welfare. As set out on page 1 above, we suggest the next strategy includes the theme “*Protect Animals, Protect People*” and this be utilised to justify such education and also incorporated into the specific legal training mentioned.

- Animal welfare education in schools: We understand that the Advisory Council on Companion Animal Welfare are currently looking at this as a possibility. We believe this needs to be prioritised and implemented as soon as possible.
- Dog law education for relevant stakeholders: As we understand it, very few of the relevant stakeholders receive specific education on dog law or animal law generally e.g. Gardaí, veterinarians, animal welfare organisations. To our knowledge, this is only supplied to dog wardens. While this is welcome, it should be provided across the board so all relevant stakeholders understand the law, their role, their powers and their responsibilities. We believe this would go a long way towards effective enforcement.
- Specific animal welfare / animal law seminars for the judiciary: We believe that specific training or a CPD module for the judiciary in animal welfare / animal law would be extremely beneficial from a sentencing point of view. Often, the sentences for breaches of our animal related legislation do not act as an effective deterrent or work to effectively safeguard animals.

Science and Evidence Led Policy Making

7. Improving the Quality of Data

The quality of data gathered in relation to dog breeding and ownership of dogs needs to improve to better inform policymaking. It is essential that such data gathered should be fed back to the Department and published quarterly to ensure that data is kept as up to date as possible.

Further, given the emphasis on control of dogs at present, there should be a straight forward procedure for reporting dog bites and / or dogs deemed to be aggressive, which can allow anonymity. This must then be followed up on seriously, with a fair outcome for dog, owner, and human safety.

On top of this, there should be thorough investigations of dog bites by the independent regulator (once established) (and, in the meantime, by local authorities). Data is currently not being uniformly recorded (e.g. how long the owner was in possession of the dog, had the dog previously attended with a trainer, where was the dog sourced from (e.g. breeder, rescue, etc), were the dog's needs being met, the full circumstances of the incident etc). Collecting comprehensive, consistent data on the circumstances of incidents is essential to inform evidence-based policy. While recent improvements in data collection are welcome (see 2024 Dog Control Statistics), future data collection should focus on behavioural and situational factors rather than breed, to ensure policies remain breed-neutral.

8. Sentience

Under Irish law, animals continue to be treated primarily as property, notwithstanding their recognition as sentient beings in EU law¹¹ and modern welfare science. This creates an ongoing legal and policy tension, particularly where economic, commercial, or ownership interests intersect with animal welfare considerations. In this regard, we would like to see the progression of the Animal Sentience Bill 2024¹².

¹¹ Art. 13 TFEU

¹² [Animal Sentience Bill 2024 – No. 75 of 2024 – Houses of the Oireachtas](#)

II. REFORMS RELATED TO DOG BREEDING

Effective regulation

9. Eliminating Dog Breeding Establishments and ‘Backyard Breeding’

Ideally, we would like to see the complete elimination of large-scale commercial dog breeding establishments and ‘backyard breeding’ in Ireland. The best scenario would be a situation whereby dogs are not bred for profit. Our current breeding landscape is likely the main factor in our dog control issues and also raises and leads to countless welfare issues. Further, Ireland has unenviably become known as the ‘*puppy farm capital of Europe*’, something which reflects really poorly on us as a society.

Aside from this, we believe that if the revenue from dog breeding (i.e. licencing fees and taxes) was compared with the costs of Ireland’s dog breeding landscape (e.g. lost revenue from undeclared profits, resourcing of animal welfare organisations, enforcement agencies, local authority pounds, cost of inspections, employment of dog wardens, cost of enforcement through the judicial system etc), there is no financial basis for allowing breeding to continue in its current form or at scale.

We believe that there should be an extremely low limit on the amount of breeding females any one person can have / breed from (for example, 3-5) and there should be stringent legislation dealing with their breeding which is effectively enforced. There should be little to no exportation or importation of puppies in Ireland.

We appreciate that the above may be a longer term goal and, in the interim, the Dog Breeding Establishments Act 2010 and the Animal Health and Welfare (Sale or Supply of Pet Regulations) 2019 should be amended / enhanced by way of a number of short-term and long-term aims¹³. An excellent first step in this would be to progress the Social Democrats’ Dog Welfare (Amendment) Bill 2025 to Committee Stage. Further, all dog breeding establishments should be subject to unannounced inspections by an independent team of Department inspectors¹⁴.

In the short term, the Department should also consider implementing Lucy’s Law (in line with the United Kingdom including, most recently, Northern Ireland¹⁵) which would help to prevent mass export of dogs from the Republic of Ireland. We note that the Government is keen to align with our neighbours when it comes to dog control and believe that aligning when it comes to dog breeding is especially important given the ease with which dogs can cross the border.

10. Incentivised Neutering

Incentives for neutering should be introduced, such as reduced fees for dog licences of owners of neutered dogs. There should also be a reimbursement scheme for neutering costs for dog welfare organisations that assist with State dogs¹⁶.

Science and evidence led policy making

11. Ban on Surgical Artificial Insemination

While we appreciate that Greyhound Racing Ireland has drafted updated Artificial Insemination of Greyhound Regulations, this is not sufficient. The Government needs to draft a single set of regulations which would ban surgical artificial insemination in all breeds of dog and provide for stringent penalties for any breaches.

¹³ [See pages 9-28 of the Fieldfisher LLP pro bono paper 'Key Reforms to Dog Breeding in Ireland'](#).

¹⁴ [See pages 31-32 of the Fieldfisher LLP pro bono paper 'Key Reforms to Dog Breeding in Ireland'](#).

¹⁵ [Muir seeks views on selling and supplying puppies and kittens in Northern Ireland | Department of Agriculture, Environment and Rural Affairs](#)

¹⁶ [See pages 29-30 of the Fieldfisher LLP pro bono paper 'Key Reforms to Dog Breeding in Ireland'](#).

While the Veterinary Council of Ireland has prohibited the procedure, this does not have legislative footing. Given the welfare implications of this practice¹⁷ and the public's strong desire to have the practice banned in all dogs¹⁸, we need specific legislation with appropriate penalties.

12. Innate Health and Extreme Breeding

We are pleased to see that there is an Innate Health and Extreme Breeding Sub-group of the Advisory Council on Companion Animal Welfare. We would like to see the elimination of extreme breeding / extreme conformation and a focus on innate health which has a legislative footing. The UK's All-Party Parliamentary Group for Animal Welfare's innate health assessment tool, is a fantastic resource in this regard¹⁹.

We believe this reform would be easier achieved if large scale dog breeding establishments and 'backyard breeding' were eliminated as suggested above. There would also be no need for canine fertility clinics (which present significant welfare concerns) in such circumstances. In the meantime, canine fertility clinics should be regulated²⁰.

¹⁷ [VCI-Code-of-Conduct-Report-Final-Revised-April-2025.pdf](#)

¹⁸ [Consultation results](#)

¹⁹ <https://www.innatehealthassessment.org>

²⁰ [See page 30 of the Fieldfisher LLP pro bono paper 'Key Reforms to Dog Breeding in Ireland'](#).

III. REFORMS RELATED TO DOG WELFARE

Working in Partnership / Effective regulation

13. Cruelty Cases – Resourcing and Enforcement

Significant resources should be given to ensure that all instances of animal cruelty can be prosecuted to the fullest extent. We have set out our suggestions as to how this can be achieved below:

- Dedicated Garda Animal Welfare Crime Unit: A dedicated animal welfare crime unit in An Garda Síochána should be established, which has been long called for by My Lovely Horse Rescue²¹. An animal welfare & law module should also be taught in Templemore to ensure Gardaí feel confident and equipped to investigate animal welfare concerns. PULSE should also be updated to include the additional category of "animal cruelty / neglect" to avoid incidents being logged under "attention and complaints" where non crime related incidents are logged.
- Improve reporting mechanisms: We believe that the public are disillusioned when it comes to reporting animal cruelty in Ireland – they do not know how to report, and when they do make a report they believe they are sent from pillar to post with no one taking effective responsibility and also feel that investigations do not always occur off the back of reports. Therefore, we need a public campaign informing the public of who is authorised under each relevant piece of legislation and how to make an effective complaint.
- Increased transparency: The availability of a single national reporting portal for complaints, with triage, tracking, and feedback, may assist in reducing harm and improving public confidence.

There is also no central public dashboard for inspections, outcomes, sanctions, welfare incidents, or prosecution results across sectors. Information is often only obtainable through freedom of information requests or responses to parliamentary questions, limiting public visibility of enforcement activity and outcomes. Further transparency issues include:

- There is no publicly accessible list of all authorised officers under the Animal Health and Welfare Act 2013 nor is it clear which local authorities have the powers to make dog wardens authorised officers.
- Court outcomes often rely on journalists being physically present in court and choosing to report cases, meaning many prosecutions may not be readily visible. This can limit the availability of data for evidence-based policy development.
- Registers of dog breeding establishments are maintained by individual local authorities. While a national dog breeding establishment list exists, available versions are not live or regularly updated, do not consistently include maximum permitted breeding numbers, and do not provide Eircodes. The most recent list available is 2024.²²

Consideration should therefore be given to the routine publication of inspection data, non-compliance findings, enforcement actions, and prosecution outcomes, by sector, county, and year, as a core element of transparency within the next Animal Welfare Strategy.

- Effective Coordination: animal welfare enforcement often requires a multi-agency approach, involving coordination between bodies with different statutory remits, including the Department, local authorities, An Garda Síochána, Revenue and Customs, and other relevant agencies. Welfare issues can span multiple legislative frameworks. Therefore, there should also be an emphasis on collaboration across enforcement agencies. Each enforcement agency needs to clearly understand the law, their roles, their responsibilities and their powers. They also need to be encouraged and supported to enforce the legislation that is in place.

²¹ [2024-10-23 opening-statement-eoin-cullen-chairperson-my-lovely-horse-animal-rescue_en.pdf](https://assets.gov.ie/static/documents/dog-breeding-establishment-national-register-2024.pdf)

²² <https://assets.gov.ie/static/documents/dog-breeding-establishment-national-register-2024.pdf>

The next Animal Welfare Strategy should therefore consider how clearer coordination structures, information-sharing protocols, and defined lead-agency roles could support more effective, efficient, and consistent enforcement across overlapping legal frameworks.

- **Additional recruitment:** The SPCA inspectors do incredible work and we believe that many more inspectors should be appointed. We would also support the appointment of further animal welfare organisations as authorised officers under the AHWA 2013, should they wish to take on that responsibility. Resourcing should allow such inspectors should be available in each county and on a 24/7 basis. Currently, My Lovely Horse Rescue seems to operate as Ireland's only out of hours emergency response yet their government funding is a meagre €90,000 when compared to the funding received by the NSPCA (€2,606,825²³).

14. Cruelty Cases – Sentencing

Sentencing needs to be urgently reformed when it comes to convictions for animal cruelty, particularly in respect of disqualification orders.

All too often horrific cases of cruelty / neglect²⁴ are reported in the media and very short disqualification periods are imposed by the courts and once the period ends, these people are free to own and potentially abuse animals again in the future. This sends a very poor message to the public that animal welfare is not taken seriously and fails to act as the necessary deterrent to prevent future behaviour.

As such, an amendment to s58 of the Animal Health and Welfare Act 2013 is required to ensure that following a conviction for cruelty, lifetime disqualification orders are imposed by default 'unless the Court sees good reason not to do so'. This stipulation would ensure that the Court's discretion is not fettered but will encourage a more consistent and rigorous approach to protecting animal welfare. There should also be a specific ban on abusers keeping pets 'at their property' to prevent them circumventing their disqualification orders and claiming the pets belong to family members.

There appears to be limited visibility regarding the monitoring and enforcement of disqualification orders and other bans imposed by the courts, which may raise questions about their practical effectiveness. Consideration may be given to the establishment of a publicly accessible list of animal welfare convictions, similar in principle to the Revenue Commissioners' tax defaulters list, in order to promote transparency, accountability, and deterrence.

Concerns have previously been raised regarding the ability to rehome animals seized under the Animal Health and Welfare Act 2013 while court proceedings are ongoing. In response, a Private Members' Bill titled the 'Animal Health and Welfare (Dogs) Bill 2022' was introduced to amend the Animal Health and Welfare Act 2013. The Explanatory Memorandum²⁵ to the 2022 Bill notes that the position under the 2013 Act contrasts with the Control of Dogs Act, under which dogs may be rehomed after a specified period. The next Animal Welfare Strategy may consider this issue in the context of animal welfare impacts associated with prolonged periods in kennels or other holding facilities, as well as enforcement effectiveness and the resource and cost implications of extended detention of seized animals.

We note that sometimes the Probation of Offenders Act 1907 is utilised in cases involving animal welfare offences. However, such offences are not trivial in nature, involve sentient beings, and warrant meaningful legal consequences and therefore consideration should be given as to whether this is appropriate.

²³ [Minister Heydon announces an increased allocation of €6.4m in grants to 94 animal welfare charities](#)

²⁴ In 2023 the ISPCA saw a 75% increase in cases submitted for criminal prosecution (from 17 cases in 2022 to 33 in 2023). In just one week in February 2024, five cruelty convictions were recorded, resulting in:

- 4 custodial sentences totalling 15 months
- 13 disqualification orders
- €14,400 in fines
- €26,551.53 in court costs.

²⁵ Explanatory memorandum to the Animal Health and Welfare (Dogs) Bill 2022
<https://data.oireachtas.ie/ie/oireachtas/bill/2022/54/eng/memo/b5422s-memo.pdf>

Science and evidence led policy making

15. Ban on Use of Dogs in Animal Testing

We recommend introducing a statutory prohibition on the use of dogs in scientific or experimental procedures. Dogs are currently permitted for use under existing animal research frameworks, subject to licensing and ethical review; however, the availability of validated alternative methods such as in vitro testing, computational modelling, and non-invasive clinical research—renders such use increasingly unnecessary. A legislative ban would align Ireland with emerging international standards, including EU objectives to reduce and replace animal testing, and would provide clarity for research institutions and enforcement bodies. This measure would also strengthen Ireland’s compliance with the principles of the Three Rs (Replacement, Reduction, Refinement) embedded in Directive 2010/63/EU on the protection of animals used for scientific purposes.

16. Euthanasia

Legislation should be updated to make it clear that dogs can only be euthanised by a qualified veterinary professional. This clarification would ensure consistency with professional standards, safeguard animal welfare, and eliminate ambiguity regarding who is legally permitted to perform euthanasia. It should also include provisions for record-keeping and compliance monitoring to support enforcement and transparency.

IV. REFORMS RELATED TO DOG CONTROL

Effective regulation

17. Improving the Microchipping System & Licensing System

It is essential that the Microchipping of Dogs Regulations 2015 (S.I. No. 63/2015) (the “**2015 Regulations**”) is amended to improve the microchipping system in Ireland. The EU Proposal (referred to on page 3 above) will mandate the creation of a centralised database of microchips that is interoperable with other member states databases once the relevant provisions take effect. This is therefore coming down the tracks in any case but needs to be actioned urgently.

The quality of data stored on a microchip should also be improved. Dogs Trust ‘Pawlitical’ Manifesto notes that *“A brand new government-held database needs to be created, with information on every touchpoint in a dog’s life – for example, their parentage, breeder, microchipping, licensing and details of dog-related incidents”*. We support this approach.

An online publicly searchable commercial breeder database should also be established. This could display; breeder name, type of licence, licence number, county, number of breeding bitches held, number of dogs sold in the previous year. Registered sellers should also be captured²⁶.

There should also be greater enforcement of the licensing system. The State is missing out on a huge amount of licence fees that could be used to invest in its dog control system. Licence fees could go towards funding an independent regulator.

Owners should also have to provide their dog’s microchip number to obtain a dog licence to ensure greater compliance with microchipping requirements and allow for better collection of data.

Shockingly, the 2024 Dog Control Statistics reveal the following:

- 56% of dogs entering pounds were not microchipped;
- 3% were microchipped but not registered; and
- Only 34% were fully compliant with microchipping requirements.

In April 2024, the Department confirmed that, to date, only six prosecutions have involved charges related to breaches of the 2015 Regulations. Importantly, these cases also included other charges—none were prosecuted solely under the 2015 Regulations.

This is deeply concerning given the low compliance levels, and we understand that improving enforcement will be a key focus for the Department in the coming years.

18. Control of Dogs Legislation

We eagerly await the recommendations of the Dog Control Stakeholder Group which we note are due in early 2026. The Control of Dogs Act 1986 (and regulations made thereunder) should be reviewed in detail and an effective overhaul should be undertaken with a focus on breed neutral policies. The Government should effect legislation that is in line with evidence and expert opinion in the area. Some suggested reforms are:

- Serious penalties for those who are responsible for a dog that is knowingly aggressive and they have not acted upon minimising the risk of this dog.
- Thorough investigations of dog bites by the independent regulator (once established) (and, in the meantime, by local authorities).

²⁶ See pages 32-36 of the Fieldfisher LLP pro bono paper ‘Key Reforms to Dog Breeding in Ireland’.

- More dog wardens who have undergone appropriate training to carry out their duties effectively and fairly. Resourcing should also allow dog wardens and local authority pounds to operate on a 24/7 basis.
- Introduction of mandatory theory tests (valid for 10 years) to obtain a dog licence. The theory test should cover things like socialising a puppy, responsible dog ownership (including respecting other dog owners), understanding dog body language (which is key to bite prevention), understanding the dangerous side effects to using painful training tools, etc. All of this information needs to be carefully understood before owning a dog. The theory test should be retaken every 10 years to ensure dog owners remain up to date with best practices and evolving welfare standards.
- Serious regulation of the dog training / behaviour industry with a ban on the use of aversives, as studies show that punishment leads to increase in aggression. In this regard, we believe the legislation banning shock collars which was promised in May 2024 should be prioritised.
- Temperament / character testing for restricted breeds (in the event that breed neutral policies are not implemented).
- Mandatory veterinary check-ups annually for pain, as pain is often a contributing factor in aggression.

19. XL Bully Ban Amendments

Ahead of the implementation of better breed neutral dog control policies, we believe urgent reforms are required to the Control of Dogs (XL Bully) Regulations 2024 (as amended), as follows:

- The appeals process should be extended to dogs without an identifiable owner (i.e., those in pounds / abandoned / surrendered). At present, the decision of the dog warden (who is not adequately trained to classify dogs) in respect of these dogs is final. This is leading to hardship for rescues and many dogs are at risk of euthanasia from being incorrectly classified; and
- The appeals process should be extended to dogs born after 10 December 2024. The current situation whereby dogs born after 10 December 2024 have been given a **death sentence with no chance of appeal** is completely **out of line with our UK** counterparts, where a dog of any age classified as a banned breed can get an exemption.

While these are the key reforms we believe should be implemented, we would also suggest the following:

- Review and update of the definition of an XL Bully type dog, which remains extremely vague and subjective.
- Correction of the clear errors in legislation e.g. placing the minimum height requirement on a statutory footing.
- Adequate training for both dog wardens and veterinary practitioners in classification.
- An appeals process that is rooted in the judicial system. For example, in the UK, their appeals are determined by a court, where expert evidence can be called by both sides. Importantly, temperament is also taken into account.

Further information can be found in Dog Law Ireland's Open Letter to the then Minister Calleary dated 12 February 2025²⁷.

20. Renting with Dogs

Dogs Trust states that the number of people contacting them to give up their dog as their new home won't allow pets has risen by 112% in 5 years²⁸. There needs to be an urgent reform when it comes to 'blanket bans' on dogs in tenancy agreements.

With rental demand at an all-time high and housing supply under severe pressure, blanket bans on pets in tenancy agreements are forcing families into heartbreaking decisions to either give up their dog or face

²⁷ [Dog Law Ireland Open Letter to Minister Calleary - 12 February 2025 2.pdf](#)

²⁸ [Restrictive Rental Laws Mean Dog-Friendly Homes Scarce | Dogs Trust](#)

homelessness. We believe urgent reform is needed to address this issue in both the public housing sector and the private rental sector. Specifically:

- Amend Section 12 of the Residential Tenancies Act 2004 to prohibit blanket bans on pets in tenancy agreements, while allowing landlords to impose reasonable conditions (e.g. pet deposits or insurance).
- Introduce clear guidance for landlords and tenants to balance property protection with animal welfare.
- Consider incentives for pet-friendly housing, such as tax relief or grants for landlords who accommodate pets responsibly.

We are enthused by the recent announcement that policies are being drafted to end blanket bans on pets in housing provided by Approved Housing Bodies. This proposal should be expedited and apply to all social housing.

We would further note that survivors fleeing domestic abuse may face barriers to accessing accommodation that accepts pets, which can result in delayed departure or separation from animals. The availability of nationwide pet-inclusive supports, fostering options, and emergency accommodation pathways is therefore a relevant consideration within the intersection of animal welfare, housing, and social policy.

These reforms would help reduce the number of dogs surrendered to pounds and rescues, alleviate pressure on the animal welfare system, and support responsible pet ownership in line with modern housing realities.

21. Pet Theft

In line with neighbouring jurisdictions, we would like to see a standalone offence created for pet theft. At present, the theft of a companion animal is seen as the theft of property and prosecuted under the Criminal Justice (Theft and Fraud Offences) Act 2001 (as amended). This reflects that pets are seen as property under Irish law and does not reflect the value that society places on our companion animals. Establishing a specific offence would recognise the societal value placed on companion animals, enable stronger penalties and sentencing guidelines, and allow law enforcement to prioritise these cases. This approach would also align Irish law with emerging EU and UK standards, deter organised crime linked to illegal breeding, and improve recovery rates through dedicated enforcement protocols.

V. BAN ON LOW WELFARE PRACTICES

Science and evidence led policy making

We believe that the below practices (at points 23, 24 and 25) impact Ireland's dog welfare landscape negatively and should be banned. These activities are rife with overbreeding, something that we need to put a stop to in general in Ireland. There are often extremely low welfare standards for the dogs involved with insufficient resourcing available to properly regulate these industries' abundance of welfare concerns. We also do not believe that the nature of these practices align with good dog control.

Banning these practices would show Ireland as a progressive animal welfare centred nation and would also go a long way toward improving our dog breeding and dog control issues.

22. Greyhound Racing

While we appreciate that the Animal Welfare Strategy must align with the Programme for Government as well as the Department's Statement of Strategy, we cannot omit our suggestions in respect of greyhound racing.

Given the revelations of "RTE Investigates – Running for their Lives", a documentary on the greyhound racing industry in Ireland, which aired in 2019, and given that we have seen little to no improvement since, greyhound racing should be banned in Ireland. The airing of the documentary highlighted severe issues with the greyhound racing industry, including the euthanasia of thousands of dogs (some under a year old) deemed too slow and the use of illegal drugs.

Ireland is one of very few countries which still allows commercial greyhound racing, putting us out of line with international animal welfare best practice.

Animal welfare organisations should be consulted heavily as to the best way to implement this ban to ensure the welfare of all greyhounds in the industry. In the meantime:

- Surgical artificial insemination in greyhounds should be banned;
- Public funding to the greyhound racing industry should cease;
- More stringent inspections and regulations should be put in place to ensure better treatment of greyhounds;
- Additional funding should be allocated towards greyhound welfare programs, including rehoming initiatives;
- Mandatory reporting of injuries and deaths during training (given that mandatory reporting currently only relates to racing);
- Inspections and audits of greyhound training facilities; and
- A cap on the number of greyhounds bred annually to reduce overproduction.

23. Hare Coursing

Hare coursing continues to raise serious and well-documented animal welfare concerns and remains increasingly out of step with contemporary welfare standards, public expectations, and international best practice. While the activity operates under a licensing regime, it inherently involves the pursuit, capture, handling, and release of wild hares by dogs for sport. Veterinary and scientific evidence consistently demonstrates that this process causes extreme stress to hares and frequently results in injury or death, either during the coursing event itself or subsequently due to capture myopathy, shock, or increased vulnerability to predation following release.

Ireland is now one of very few jurisdictions that continues to permit regulated hare coursing, placing it at odds with evolving international animal welfare norms. Licensing and regulatory conditions cannot adequately mitigate the intrinsic welfare harms associated with the activity, nor do they address the ethical concerns arising from the use of dogs to chase wild animals for recreational purposes. From a dog welfare perspective, hare coursing also raises concerns regarding selective breeding, training practices, and the management of coursing dogs within a system that prioritises performance over welfare outcomes.

In the context of the next Animal Welfare Strategy, we submit that a phased prohibition on hare coursing should be seriously considered. At a minimum, the strategy must commit to a comprehensive review of the practice grounded in current animal welfare science and ethical standards.

24. Hunting with Dogs

Hunting with dogs presents ongoing animal welfare concerns for both the quarry animals involved and the dogs used in these activities. The pursuit of wild animals by packs of dogs can involve prolonged chases, significant stress, injury, and in most cases, inhumane deaths. While alternative practices such as trail hunting are sometimes cited, persistent enforcement challenges and a lack of transparent, reliable data make it difficult to assess whether such alternatives effectively prevent animal welfare harms in practice.

From the perspective of dog welfare, hunting with dogs exposes animals to risks including injury, exhaustion, inadequate veterinary oversight, and unsuitable housing or management practices outside of active hunting periods. We recommend that the next Animal Welfare Strategy adopts a precautionary, evidence-led approach to hunting with dogs, including a comprehensive review of both the activities themselves and the associated infrastructure. Public policy, planning, and licensing decisions should be aligned with animal welfare objectives and should not inadvertently entrench practices that may be inconsistent with Ireland's evolving animal welfare commitments.

We look forward to seeing Ireland's Animal Welfare Strategy 2026 – 2030 in due course.

Should you have any queries, please do not hesitate to contact us at doglawireland@gmail.com.

Yours sincerely,

Hannah Unger, Demi Mullen, Carrie McMeel

Dog Law Ireland