

Licensing Limitations

How dog licensing works
and its lack of effectiveness



Executive summary

- The Kennel Club does not believe that the re-introduction of dog licensing will bring any discernible benefits to dog control or dog welfare
- The fundamental justifications for the abolishment of dog licensing in 1987 remain true today
- The ability or willingness of a dog owner to pay a 'dog tax' has no bearing on their ability to control or meet the welfare needs of their dog
- There is a clear trend across Europe for the abolishment of existing licensing regimes, where they still exist, for example in Isle of Man, Netherlands, and Finland
- Dog licensing exists in a perpetual 'tug of war' between two opposing objectives, with compliance on one side and revenue generation on the other. Minimising the cost of a licence maximises compliance, but at the cost of revenue generation



Introduction

Dog licensing was mandated across the UK until 1987, at which point it was abolished in Great Britain.

In 1989 the Government outlined its position regarding the dog licence – “The national dog licensing system, which was abolished in 1987, did nothing to contain the problems caused by irresponsible dog ownership since it had long ceased to command any public respect. Less than 50% of owners bothered to register. As a result, there is no evidence that the number of strays is higher since the abolition of dog licensing.” ¹

In 1990 the Government further stated - “The Government rejected this position in the Action for Dogs papers and remains of the view that a national registration scheme is neither a solution to the problems caused by irresponsible dog owners nor an effective means of raising revenue for dog control.

“As far as the revenue from a dog registration scheme is concerned, this would largely be used in running the scheme itself, rather than in paying for dog wardens to deal with the problems on the streets. Research carried out for the RSPCA suggests that it would cost about £20m simply to process registration, renewals and changes of address. A further £22m would be needed to finance a national dog warden network. Nor would such a scheme, in the Government’s view, meet the ‘polluter pays’ principle. It is the responsible owner who would register, while the irresponsible owners who cause all the problems are unlikely to do so.” ²

We believe that these fundamentals remain completely unchanged since 1989/90. As outlined 30 years ago, dog licensing is a high cost, low compliance, low benefit endeavour.

This is reflected in the trend across Europe to abolish dog licensing schemes in favour of compulsory microchipping i.e. Isle of Man ³, Netherlands ⁴ and Finland ⁵. With the advent of dog microchipping delivering far superior results in relation to identification and reunification of straying or out of control dogs, it is even harder to justify the advantages of dog licensing to dog owners.



¹ Action on dogs: the government’s proposals for legislation. DoE/Welsh Office 10.11.89 Deposited Paper 5256 paras 24-26

² The control of dogs: a consultation paper. Home Office, Scottish Office, Welsh Office & DOE. 27.6.90 Deposited Paper 6158 pp.1-2

³ <https://www.bbc.co.uk/news/world-europe-isle-of-man-43570405>

⁴ <https://www.cbs.nl/nl-nl/nieuws/2024/05/gemeenten-begroten-13-3-miljard-euro-aan-heffingsopbrengsten-in-2024>

⁵ <https://yle.fi/a/3-9933783#:~:text=Only%20two%20cities%20%2D%20Helsinki%20and,their%20annual%2050%2Deuro%20fee>

| What is the aim of dog licensing?

Proponents of licensing have various objectives: identifying where dogs are; providing a revenue stream to enforcement bodies; improving dog control and welfare; and those who believe it will deliver a mixture of all or some of these.

In reality these objectives are at odds with each other. Generating revenue from licensing requires high licence fees to cover the costs of administering the scheme. High fees are inherently detrimental to compliance rates. Low compliance nullifies the use of licensing to identify where dogs are and limits any theoretical impact licensing could have on dog control and welfare.

Conversely a low fee or zero cost licence, is likely to drive higher compliance rates, but would cause the licensing scheme to run at a significant deficit, requiring the authorities to invest considerable sums to simply administer the scheme; money which could be better deployed in enforcement and behaviour change, to deliver better outcomes.

In practice it appears that most dog licensing schemes attempt to find the centre ground between these opposing aims, resulting in a failure to achieve any meaningful benefits.



Case study - Northern Ireland

While dog licenses were abolished in Great Britain in 1987, the system was retained in Northern Ireland, reportedly due to higher levels of straying and livestock worrying.⁶

International examples provide a useful opportunity to review how other countries approach dog control and related matters. However, significant cultural differences in relation to dog ownership, dog walking, and general law compliance etc, provide limits on the transferability of any international model. As such the operation of dog licensing in Northern Ireland provides the best indication of how licensing may operate in the rest of the UK.

It's not possible to say with certainty what the dog population is in Northern Ireland or indeed the UK, limiting our ability to accurately estimate the rate of compliance for dog licensing in Northern Ireland. However estimates of the dog population in Northern Ireland ⁷ and official licensing numbers ⁸, provide for an estimate of 35-50% compliance with licensing, which is in line with previous estimates.⁹

In Northern Ireland the cost of a dog licence is £12.50 per year for a single dog, with a £5 per year concessionary rate, and the first dog licence being free for over 65's.

When we submitted FOI requests to NI councils, only Belfast Council was able to provide us with a breakdown of the cost of their dog warden service, alongside the income generated from licensing. In the period between 2018-2023, the average annual income from the dog licence

was £79,662. The average annual expenditure on their dog warden service was £792,964 - almost ten times higher.

The Northern Ireland Dogs Advisory Group (NIDAG), which represents council dog wardens, report that for the concessionary licence "current administration costs outweigh the licence cost, particularly where documentation/ verification checks are required prior to a licence being issued." Furthermore "approximately 80% of licences issued currently are on a concessionary basis". ¹⁰

Across all the councils of Northern Ireland the average price paid per dog licence in 2023/24 was £5.93. The bureaucratic cost of administering the dog licence scheme in Northern Ireland almost certainly costs more than the revenue generated by licensing. The administration of licensing is having to be subsidised by general local taxation.

If dog licensing was maintained in Northern Ireland as a tool to address staying dogs, it appears to have failed, with Northern Ireland continually topping the charts with the highest number of stray dogs per head of population.¹¹ In terms of dog attacks, Belfast has appeared in the highest risk areas for dog attacks on postal workers in the UK for the past two years.¹²

Therefore dog licensing does not appear to have had a meaningful impact on dog control issues in Northern Ireland.

⁶ HC Deb 12 December 1996 c326

⁷ <https://www.ukpetfood.org/information-centre/statistics/uk-pet-population.html>; <https://www.pdsa.org.uk/what-we-do/pdsa-animal-wellbeing-report/paw-report-2024> and <https://www.researchsquare.com/article/rs-3772889/v1>

⁸ <https://www.daera-ni.gov.uk/publications/council-dog-summary-statistics-202425>

⁹ <https://committees.parliament.uk/writtenevidence/91307/html/> and <https://publications.parliament.uk/pa/cm201213/cmselect/cmenvfru/575/575we06.htm>

¹⁰ NIDAG submission to DAERA, October 2023 – obtained under FOIA

¹¹ <https://www.dogstrust.org.uk/how-we-help/professionals/research/stray-dogs-survey-research>

¹² <https://www.bbc.co.uk/news/uk-northern-ireland-66085636> & <https://news.sky.com/story/concerning-increase-in-dog-attacks-on-postal-workers-as-royal-mail-asks-owners-to-take-care-13161675>

| Case study - Republic of Ireland

As with Northern Ireland, a dog licensing regime has been in operation in the Republic of Ireland for a significant period of time.

The Irish Government publishes annual information regarding the number of dog licences issued. In 2020 approximately 206,000 dog licences were active.¹³

The European Pet Food Industry Federation (FEDIAF) estimated the dog population of the Republic of Ireland to be 455,000 in 2020. Separately, microchip companies reported a combined total of 594,571 microchips had been issued in Ireland between 2015-2020 (a dog will have a single microchip inserted for their lifetime).¹⁴ These figures imply a dog licence compliance rate of 34-45% in the Republic of Ireland.

Meanwhile, the cost of a dog licence in the Republic of Ireland is 20 euro, equivalent to £16-17 and every single council in the Republic of

Ireland is operating their dog control service at a deficit, with an overall deficit of 4.6 million euros reported for 2023.¹⁵

This is because for every two full time dog wardens, one more full time administrative staff is employed, with some councils reporting that they employ more full-time equivalent (FTE) administrative staff than on the ground dog wardens.

It's difficult to separate out the cost of administering and enforcing licensing from other dog control costs. However, the total declared expenditure on dog control in the Republic of Ireland is just over 9 million euros, for which 63.3 FTE dog wardens are employed. This indicates an overall cost of £120,000 per FTE dog warden employed and a broken system given the compliance rate.

| Case study - Switzerland

Periodically it's suggested that dog licenses could be linked to competency assessments. This model was adopted nationally in Switzerland for 8 years, from 1 September 2008 to 31 December 2016. The Swiss model mandated a pre-purchase theoretical course, which only had to be completed once, and a post-purchase practical course, that had to be completed following each dog purchased.

A comprehensive review, led by the Swiss Federal Office for Food Safety and Veterinary Affairs, determined that 80% of owners complied with the requirements. However, there had been no decrease in incidents such as dog bites and attacks and no noticeable difference between the behaviour of dog owners who had taken part in the course and that of those who hadn't.¹⁶ As such the Swiss Parliament voted to end the compulsory training mandate.¹⁷

¹³ <https://www.gov.ie/en/collection/879d4c-dog-control-statistics/>

¹⁴ More, S.J., Collins, D.M., Meunier, N.V. et al. Understanding the dog population in the Republic of Ireland: insight from existing data sources?. *Ir Vet J* 75, 16 (2022)

¹⁵ <https://assets.gov.ie/307767/7ca82948-cb76-4556-bf98-570208411d8a.pdf>

¹⁶ https://www.blv.admin.ch/dam/blv/fr/dokumente/tiere/heim-und-wildtierhaltung/bericht-evaluation-skn-sachkundenachweis.pdf.download.pdf/1656_be_Evaluation_SKN_fr.pdf

¹⁷ <https://dogsmoonthly.co.uk/2016/09/22/courses-new-dog-owners-no-longer-mandatory-switzerland/>

Case study - Calgary

Calgary is promoted by many as the 'gold standard' of licensing models. Regular claims are made of compliance rates exceeding 90% ¹⁸ with a large reduction in dog bites being recorded.¹⁹ Yet, little evidence is supplied to support these claims, and what evidence is supplied, is not subject to any significant scrutiny.

Calgary model - compliance

With regards to compliance, in July 2016 the council reported 135,000 dog licences had been issued,²⁰ with the council themselves estimating this equated to approximately 75% compliance.²¹ However in the period since, the number of active licences has steadily fallen and now stands at ~87,000 ²², a reduction of 36%.

In 2020 Calgary Council commissioned an independent market research company to survey Calgarians in relation to pet licensing. The findings of the Council's research study provided a dog population estimate of 237,000 owned dogs in Calgary.²³ This indicates a licensing compliance rate of just 39%.

This estimate is supported by analysis of the dog population in Canada conducted by The Canadian Animal Health Institute, whose data allows for an estimation of 274,000 dogs in Calgary ²⁴, translating to a compliance rate of 33%.



²⁰ <https://calgaryherald.com/news/local-news/calgarys-dog-population-soars-as-cat-ownership-plummets#:~:text=Cowtown%20is%20quickly%20becoming%20Dogtown,isn't%20necessarily%20purring%20along>

²¹ <https://www.calgary.ca/content/dam/www/cfod/finance/documents/plans-budgets-and-financial-reports/plans-and-budget-2019-2022-service-plans-and-budgets-2019-2022.pdf>

²² <https://data.calgary.ca/d/Open-Data-Terms/u45n-7awa>

²³ <https://hdp-ca-prod-app-cgy-engage-files.s3.ca-central-1.amazonaws.com/8215/8827/0551/2020-Responsible-Pet-Ownership-Bylaw-Review-Survey-Final.pdf>

²⁴ <https://cahi-icsa.ca/press-releases/2022-latest-canadian-pet-population-figures-released#:~:text=From%202020%2D2022%2C%20the%20Canadian,to%208.5%20million%20for%20cats>

Calgary model costs

The Calgary licensing model is expensive to operate. The gross operating budget for 2022 was \$11 million Canadian dollars, equivalent to ~£6 million. On a head of population basis, the Calgary model is around 2 – 3 times more expensive to operate when compared to the Republic of Ireland model, when scaled to account for the human and dog population differences.

The cost of a dog licence in Calgary is considerably more expensive than in Northern Ireland or Republic of Ireland, with a neutered dog licence starting at ~£24, an intact dog costing ~£38 and vicious dog licence costing ~£167.

Despite these higher fees, the funding for Calgary comprises 55% from licence revenue and 45% from wider tax support (figure 1).²⁵

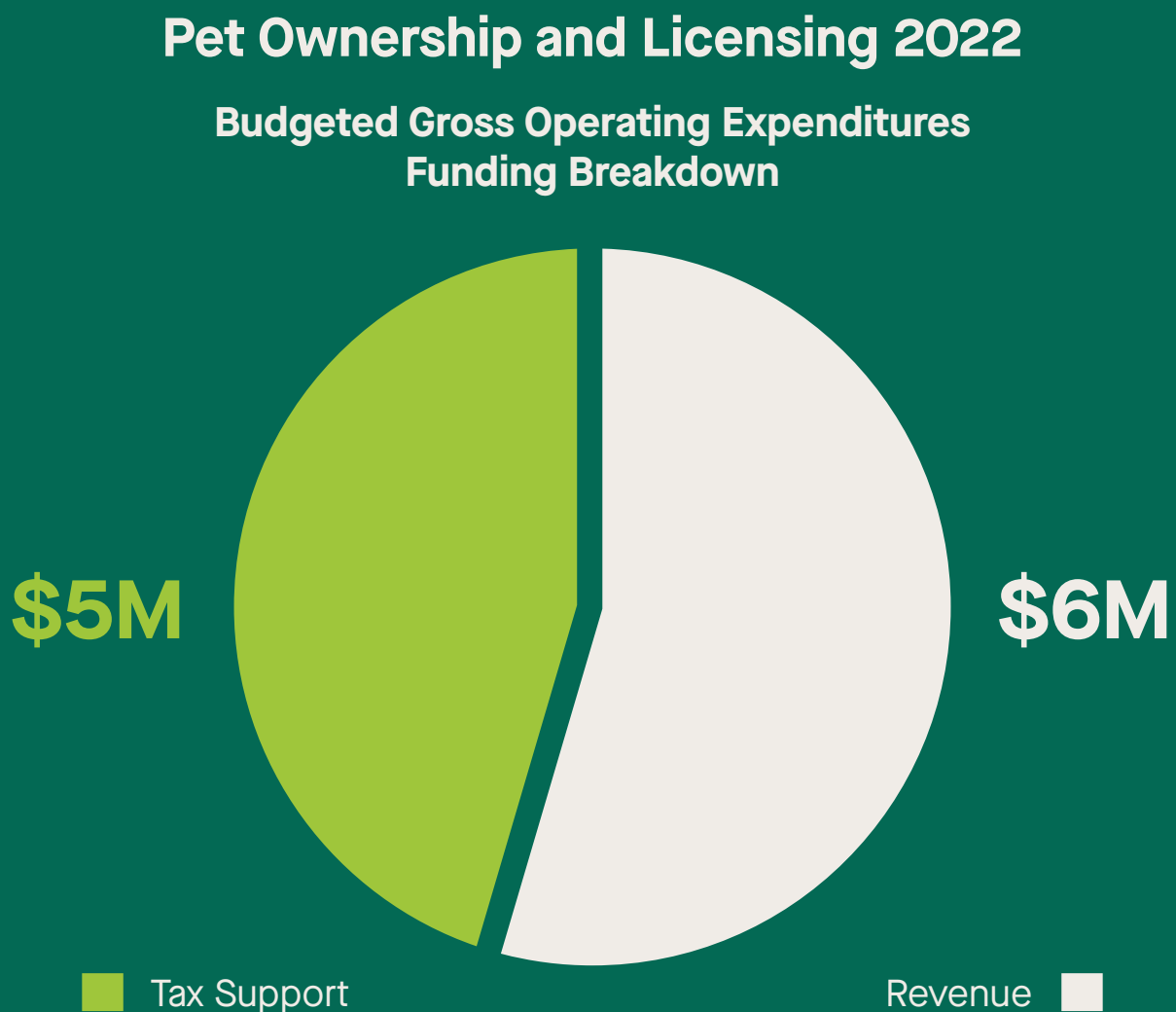


Figure 1: Calgary Council operating budget for pet ownership and licensing

²⁵ <https://www.calgary.ca/content/dam/www/ca/city-manager/documents/2023-2026-service-plans/pet-ownership-licensing-service-plan.pdf>

| Calgary model - enforcement

In addition to the financial outlay, the Calgary model relies on volunteer support: “Pet Ownership & Licensing relies on volunteers to help promote the Responsible Pet Ownership Bylaw and support the Animal Service Centre in providing socialization and enrichment for the animals. Our 2026 value is set based on our expectations to increase our capacity to onboard and coordinate volunteers for programs”, with recent service plans referencing annual volunteer hours from 500-2,500 hours.²⁶ Scaling a ‘Calgary model’ across Great Britain (and Northern Ireland) would require huge volunteer buy-in across the country.

| Calgary model - reducing dog bites?

The ‘Calgary model’ is often heralded as significantly reducing dog bites and attacks, with evidence presented to parliamentary committees of a significant reduction in attacks. “It is clear that the legislation implemented in Calgary is working well, between 1984 and 2008 there has been a marked decline in the number of dog bites from 621 to 200”.²⁷ Yet the Council’s own data suggests that dog bites had already fallen to 253 per year by 2005, a year before the ‘Calgary model’ was introduced in 2006.

A more recent study based on data collected by Calgary Council has reported a decrease in dog bites in Calgary since 2014. This suggests that ‘bite to a person’ incidents peaked in 2014 at 252 reported incidents and have now fallen to 165 in 2021. These figures equate to 20 per 100,000 human population in 2014, to around 12 per 100,000 in 2021, which on the face of it is a clear improvement, to be welcomed. However, it is worth noting that lower bites numbers have been recorded previously in Calgary both in absolute numbers and on per 100,000 population basis. In addition two further caveats must be applied.

Firstly, an academic research study into emergency departments visits in the Alberta province, found that on average 64 people in every 100,000 presented with dog bite injuries to emergency departments in Calgary between 2010-2015.²⁸ This analysis of hospital data suggests that the Council’s data, is far from comprehensive. With emergency departments visits for dog bites between 3 – 6 times higher than ‘bite’ numbers recorded by the Council.

Secondly, the period for which the council has recorded a significant reduction in bite numbers, coincides with a 36% fall in the number of dogs being licensed. The two logical conclusions are either the dog population has genuinely fallen by 36%, and therefore the reduction of bites of 34% is entirely in line with a falling dog population. Or, that both licensing compliance and bites have simultaneously fallen, which would suggest that the licensing regime has had no impact on dog bite rates.

In summary, while the ‘Calgary model’ is frequently presented as the gold standard model, the evidence suggests that the rate of compliance and revenue generation is no better than what’s seen in Northern Ireland and the Republic of Ireland, with scant evidence the licensing model has made any significant difference to dog bites.

²⁶ <https://www.calgary.ca/content/dam/www/cfod/finance/documents/plans-budgets-and-financial-reports/plans-and-budget-2019-2022/service-plans-and-budgets-2019-2022.pdf> & <https://www.calgary.ca/content/dam/www/ca/city-manager/documents/2023-2026-service-plans/pet-ownership-licensing-service-plan.pdf>

²⁷ <https://committees.parliament.uk/writtenevidence/91273/pdf/>

²⁸ Jelinski SE, Phillips C, Doehler M, Rock M, Checkley S, Rowe BH. L0031: The epidemiology of emergency department visits for dog-related injuries in Alberta. CJEM. 2016;18(S1):S40-S40

I Unintended consequences

The evidence is clear that dog ownership licensing offers no tangible benefits. For some the re-introduction of a dog tax, would be an irritating piece of additional bureaucracy to comply with. However, for many the annual licence fee, whether that be £25, £50 or more per dog, per year would be unaffordable.

Many animal rescue centres have warned that they've reached "crisis point"²⁹ due to increasing levels of abandonment and the impact of the cost of living crisis. Dogs Trust recently reported that inquiries to give up a dog had increased to historic highs, with many owners struggling with the financial upkeep of their dog.³⁰

The introduction of an ongoing annual dog tax, could spark widespread relinquishment of dogs. An MP representing Northern Ireland had been "inundated with calls from dog owners" when increases to licence fees were previously considered in Northern Ireland in 2009. He warned a rise in the number of abandoned dogs could result from the change.³¹

While theoretically, a means tested fee framework could help alleviate some of these issues, as evidenced in Northern Ireland, this introduces a significant administrative cost onto a licensing scheme. Further driving up the cost for those responsible owners, who would pay a full licence fee.



²⁹ <https://www.bbc.co.uk/news/articles/c206r2rk4rgo>

³⁰ <https://www.dogstrust.org.uk/how-we-help/stories/cost-of-living>

³¹ http://news.bbc.co.uk/1/hi/northern_ireland/8296702.stm

Conclusion

Trying to compare and translate legislative and policy measures from other countries into the UK is fraught with difficulties, due to differences in culture, enforcement etc. It is no different for dog policy, where noticeable differences in dog ownership and walking culture exist, regardless of any legislative variation.

However, notwithstanding this, our analysis of licensing regimes both locally and further afield, demonstrates that the fundamental flaws identified with dog licensing by the UK Government in 1987 remain hold equally true today.

Dog licensing regimes are plagued by a failure to achieve meaningful levels of compliance and/or revenue generation. A double whammy, where low compliance rates result in the limited revenues generated being spent on enforcing compliance to licensing, as opposed to delivering meaningful benefits either in relation to dog control or dog welfare. Licensing regimes operate in a perpetual tug of war, where failure is guaranteed.

The Kennel Club believes the evidence is clear that dog licensing offers little benefit in tackling the issues around irresponsible dog ownership.

Putting to one side the evidence that the Calgary model has not achieved any meaningful benefits to dog control, the model costs in the region of £6 million per year to operate, for a licensed dog population of around 87k dogs. Scaled up to the UK dog population this would equate to around £850 million per year. It would also require substantial investment to cover set up costs and based on the Calgary experience a significant number of volunteer hours are also required on an ongoing basis.

It perhaps worth noting the recent XL Bully ban, introduced a quasi-licensing regime for XL Bully type dogs. The UK Government charged £92.40 to register a single dog, with over 55,000 XL Bully type dogs eventually registered.³² A parliamentary question probed whether the registration fee income generated would allow for some funding to support local authorities in enforcing the ban, the Government responded - "The application fee paid by XL bully owners on registering an XL Bully covers the administrative costs for the life of the dog, including processing the application and lifetime record management."³³ This provides a clear steer on the level of cost of establishing a licensing regime today.

The ability or willingness of a dog owner to pay a dog tax has no bearing on their ability to control or meet the welfare needs of their dog. Licensing is proven to simply distract time and resources away from delivering measures which will actually deliver positive change.

We believe it would be much more beneficial to identify alternative funding mechanisms, that require minimal levels of additional administration or require dedicated enforcement. Allowing money and resources to be exclusively targeted on delivering improvements to dog control and dog welfare.

³² <https://deframedia.blog.gov.uk/2024/02/27/xl-bully-registrations/>

³³ <https://questions-statements.parliament.uk/written-questions/detail/2024-03-12/18174>



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