

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

Mr.Paul Frew MLA,
Agriculture and Rural Development Committee,
Room 359-H,
Parliament Buildings,
Ballymiscaw,
Stormont,
Belfast BT4 3XX

21st September 2012

Dear Sir,

THE WELFARE OF ANIMALS (DOG BREEDING ESTABLISHMENTS) REGULATIONS

[NORTHERN IRELAND] 2012

On behalf of the Society of Greyhound Veterinarians, the specialist division of

the British Veterinary Association dedicated to the veterinary care and welfare of the greyhound before, during and after its racing career, I should like to thank the Committee for Agriculture and Rural Development for inviting our Society to contribute to the stakeholder event held at Stormont on 18th inst..

We would like to take this opportunity to reiterate a point made during the feedback session at this meeting by Mr. Joe Byrne MLA about the desirability of separate regulations covering the welfare of greyhounds. As greyhounds are kept largely for sporting purposes their breeding and management differs significantly in many respects from those of pet dogs and their welfare needs correspondingly also differ. We fully appreciate that the drafting of further regulations would involve not inconsiderable commitments of time and expense. However we would like to point out that the Westminster government recognised the need for separate welfare legislation for greyhounds when it passed the Welfare of Racing Greyhounds Regulations 2010, secondary legislation under the Animal Welfare Act 2006. Similarly animal welfare legislation focussed specifically on the greyhound industry came into force in the Republic of Ireland last year with the passing into law of the Welfare of Greyhounds Act 2011.

As the greyhound industries of Northern Ireland and the Irish Republic are so closely intertwined as to be effectively inseparable in practice, our Society seems some merit in the adoption of elements of the existing Republic of Ireland legislation as a template for Northern Ireland greyhound welfare regulations. For example, we note that the Welfare of Greyhounds Act 2011 makes it an offence to mate a bitch which is under fifteen months of age, a move which we would be happy to endorse. Recognising that many greyhound bitches are not used for breeding until they have completed their racing career and are perhaps as much as four or five years old, this same legislation does not lay down an upper age limit after which a greyhound bitch should no longer be bred from. Rather it makes it obligatory that in some circumstances older bitches must complete a satisfactory veterinary examination prior

to mating. Our Society feels that this flexible approach to breeding from older bitches, with its in-built system of checks and balances, which places the welfare needs of the dogs before the commercial needs of the industry is worthy of adoption in Northern Ireland also. In a similar vein we note that the Breeding and Sale of Dogs (Welfare) Act 1999 in England and Wales, although specifying that no bitch may be mated until she is one year old, makes no recommendation as to the maximum age at which a bitch may be mated. When considering placing statutory limits on the maximum age at which bitches should be bred from, the welfare of the bitch must always be the overarching consideration. Our Society would not wish to endorse the mating of bitches whose health is such as to suggest that successful whelping and the rearing of a healthy litter are at least questionable. However it should not be overlooked that in commercial practice for at least some older greyhound bitches the end of their breeding life is likely to be followed quite swiftly by humane destruction.

The draft (Dog Breeding Establishments) Regulations [Northern Ireland] 2012 include a proposal that all dogs no longer required for breeding should be spayed or castrated prior to being re-homed, unless in the opinion of a veterinary surgeon such surgery would be inadvisable on health and welfare grounds. In this they depart from the precedents set by existing legislation both on England and the Republic of Ireland. It is the common experience of those working in greyhound welfare in Ireland that good quality pet homes are decidedly hard to find for fit young greyhounds. The chances of being able to find new homes for older dogs and bitches no longer wanted for breeding purposes are in many cases not good. While at first glance wholly admirable, it is the opinion of our Society that mandatory neutering of these retired dogs may in practice result in the euthanasia of many older greyhounds. As practising veterinary surgeons we would suggest that the spaying of bitches, while it is a routine procedure attended by few risks in prepubescent bitches of six or nine months of age, may prove more hazardous in older bitches which may have pre-existing health problems. In this context it is worth remembering that greyhound

puppies not registered in the Irish Greyhound Stud Book and without the necessary ear marks and identity cards cannot be used for racing or breeding and therefore have no commercial value. Thus unlike the situation prevailing in some popular pet breeds of dog, there would be little incentive to breed an illegal unregistered litter from an older greyhound bitch. While not wishing to contribute to the present heart-breaking stray dog problem in Northern Ireland, it is the opinion of our Society that there is some merit in exempting greyhounds from compulsory spaying or castration at the end of their breeding careers.

Thank you for taking the time to consider these final contributions to the discussions surrounding the Dog Breeding Establishments Regulations [N.I.] 2012. I remain

Yours in Sport,

[REDACTED]

[REDACTED]

