

P. Frazer Esq. M.C.A.

Chairman

Agriculture and Rural Development Committee

Stranmillis

26/9/12.

Animal Health and Welfare (Dog Breeding Establishments)  
Regulations

Dear Mr. Frazer,

I was present at Stranmillis on Tuesday September the 18<sup>th</sup> as a delegate from the Countryside Alliance, being assigned to Breachair Group 1. I was surprised to be informed during the Feedback session that some voices had been raised against the exemption for recognised hunt clubs. I can only surmise that this may have been partly the result of anti-hunting sentiment rather than a consideration for canine welfare. It also seemed to me that Canine Breeders Ireland, who were well and vehemently represented, were determined to stamp out any potential or imagined competition in the mass supply of puppies to the pet market. This also opposed the exemption for hobby breeders, without regard for breed maintenance and improvement and sell puppies to the first comer, as D.B.I. members do, to slip through the net. Proper hobby breeders, whether for show, field or both only sell puppies they cannot afford, or have no space to keep, question prospective owners on their circumstances and suitability, sometimes visiting their premises, often agree to take back puppies if problems develop, and would only expect to recoup a portion of their large expenditure, especially when the cost of recently developed genetic tests for possible hereditary defects in ~~breeding~~ potential breeding stock is concerned. Many buyers, of course, find this intrusive, and turn to the nearest puppy farmer, often with unfortunate results. It may be true that, as the Department has stated, he should not seek to control the puppy farmer if the strict welfare standards envisaged are imposed, and adequately enforced, but I do find it difficult to accept that the fee for 3-10 bitches of breeding age is £150, and that for over 200 bitches, a considerable enterprise and money earned only £350. Many hobby breeders keep on older bitches which they would only expose to the stress and pain of spaying if they

if they suspected the onset of womb trouble. Many of these bitches would not actually have been bred from.

To return to the exemption for hounds (which would still mean a black licence, local authority inspection etc) I think C.B.I. called attention to the alleged selling of hounds by some unregistered packs in the South. All packs registered with the Hunting Association of Ireland, the Hunting Association of Northern Ireland or the Northern Ireland Muzzers or Mounds Association forbid the selling of hounds. Hounds may only be exchanged between registered packs, likewise matings arranged.

The associations also control the areas hounds may operate in, encourage responsible relations with landowners, holders of sporting rights etc, and have strict rules re procedures in the field, especially where the treatment of the quarry is concerned. Each association has existing standards of kennel management. Identification was hitherto by ear marking or tattooing. Every pack has to possess third party insurance. A pack which breaks the rules may be expelled, in which case it cannot obtain hounds from other packs, register its hounds in the appropriate stud book, or in the case of mounted packs hold fund raising pointer-to-pointer races.

Mounds are often "walked" at the homes of and farms of keen supporters during their puppyhood, normally returning to kennels after a year old. They are probably not taken hunting until at least 18 months. Four harrier clubs maintain their hounds on a "runner fed" basis, with probably some members keeping bitches, some dogs, some with a single hound, some with several. It will take approximately three seasons before it is known whether a hound is worth breeding from, since hunting ability develops with age and experience. Basic confirmation is also, of course, considered. The majority of bitches, though not bred from, are kept entire. (Spaying can lead to a bitch

putting on weight, is incontinence, coat problems and often behavioural problems) It would be rare for any bitch to have more than three or four litters, though as with greyhounds one or more of these could well be over the age of six.

I know of one unregistered foxhound pack in N.I., and two beagle packs. One hound basically suited to the border, often crossing backwards and forward in a single day and one is seeking registration.

There are individuals keeping a hound or two (and obviously breeders of show

beagles and bassets), both foxhunts, beagles and harriers, plus bound/spaniel crosses), popular fox work in dense cover. These hounds are used to flush foxes from cover to lurchers or guns. Some hunt without permission, but many are very popular with farmers, shepherds, keepers, gun clubs and even nature reserve managers. All, of course, must have blood licenses if they have more than three birth or breeding age, and all must now microchip. I have been in W-I fox seven years, and in that time have seen a hound advanced as having a good home once in the Ulster Gazette and Armagh Observer. I have never seen puppies advanced. I do know several people who use hounds in the coursing and shooting of foxes, and it seems to me that hounds are exchanged between enthusiasts, with money in being sought.

I am sure the Countryside Alliance shares my opinion regarding exemption of hunt clubs, but my other observations re hobby breeders and the activities of C.B.I. are my own.

It saddens me to see puppy farming on a business scale legitimised, although it is, of course, a good thing that the law will insist on proper standards, if enforced. To my mind what we really need is education, and the K-C, I.K-C, breed club, and concerned hobby breeders must work together, possibly with the help of celebrities, to dispel the notion that puppies are commodities, to be purchased or stolen, and sold like ~~manufactured~~ <sup>manufactured</sup> goods. This, of course, needs money, and that will have to be raised from within the ranks of the showing/working community. Legal contracts, of course, take up money which could be used, by local authorities etc, to support a "Do you really want a dog. Are you fit to have a puppy?" scheme. Go and discuss things with your local K-C <sup>"K-C"</sup> breeders.

Yours sincerely,

