Sunnyland Beagles Hunt Club



28th September 2012

Via E-mail to: Committee for Agriculture & Rural Development Stormont

Dear Committee Member,

The Welfare of Animals (Dog Breeding Establishments) Regulations (NI) 2012

Our Club is a Beagle Hunt Club, registered with the Irish Masters of Beagles Association, and hunting on foot with beagle hounds throughout Northern Ireland, but especially in the north and east of County Down. Our club membership is approximately 65 persons, but many others will attend meets as guests on an occasional basis during the season.

We support many of the changes made to the draft Dog Breeding Establishments regulations following the public consultation and published in the document "Outcome of Consultation" circulated by DARD on 24th July 2012. However, in discussion at the stakeholders' event held on 18th September the proposal to grant exemption to hunts became the subject of further debate, and this issue is of particular concern to our Hunt Club. We offer the following comments and recommendations:

The purpose of the Dog Breeding Establishments Regulations is to ensure that 'puppy-farms' are operated to the highest standards of animal welfare. Hunt clubs (including Foxhound, Harrier & Beagle packs) are not involved in 'puppy farming' – they do not breed commercially (for sale to the public or for monetary gain); they breed to keep proven healthy working bloodlines and to maintain pack size. It would be inappropriate to define them as Dog Breeding Establishments under the Animal Welfare Act.

Good breeding practice should promote life-long health in the resultant pups / dogs. The hunt clubs' retain their hounds in packs for their working lives & it is essential for these hounds to be in peak fitness for effective hunting. Therefore, initial selection of breeding stock and subsequent life-long management of hunting hounds is tailored for optimal hound welfare & informed by generations of experience. It is our opinion that there could be no significant improvement in animal welfare for working hounds as a result of registration of hunt kennels as Dog Breeding Establishments.

Hunt clubs throughout Northern Ireland comply with the requirements of the Dogs (Amendment) Act and the micro-chipping regulations therein. They strive to maintain the highest welfare standards and to provide accountability, and are obliged under the Welfare of Animals Act 2011 to prevent harm or unnecessary suffering and to promote animal welfare, irrespective of whether registered as a breeding establishment. Even with an exemption in place, hunts would still be subject to such requirements. All packs which are members of the recognised Masters' Associations are additionally obliged to conform to the welfare & kennel management standards set out by the Hunting Association of Ireland and are subject to kennel inspections & monitoring by the relevant Masters Associations. Inclusion of hunts as Dog Breeding Establishments would merely increase the demands on Council staff time & resources, in carrying out unnecessary inspections and the associated administration, with no benefit in terms of improved animal welfare.

The management of a working pack of hunting hounds is quite distinct from the keeping of pets or dogs for breeding purposes and requires practices which often differ substantially from those for dogs kept for other purposes. What might be recommended good practice for keeping of dogs for breeding could be inappropriate for the welfare of working hounds.

We therefore strongly recommend that the Agriculture Committee should retain the exemption from a requirement for hunt kennels to register as Dog Breeding Establishments, as proposed in "Outcome of Consultation" circulated by DARD on 24th July 2012 and would ask for your support in the event of any vote on this issue.

Yours faithfully,	
(Hon. Sec.)	