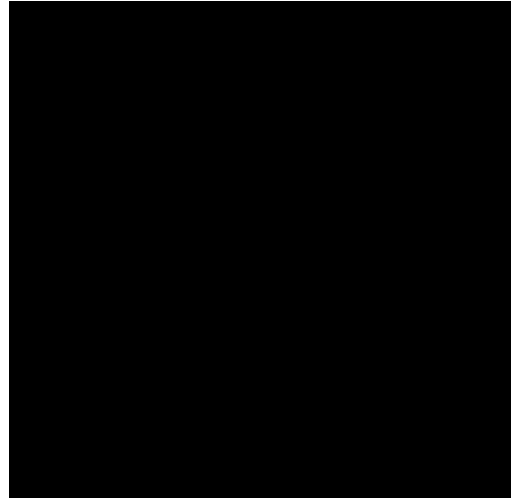


THE HUNTING ASSOCIATION OF NORTHERN IRELAND



27th September 2012

To all members
Agriculture & Rural Development Committee

Dear Committee Member,

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

The Hunting Association of Northern Ireland (HANI) is an association to promote the interests of hunting with hounds. It represents all the hunt clubs operating in Northern Ireland which are affiliated to any of the recognised Masters' Associations (NIMHA, IMFHA, IMHA, IMBA and Irish Foot Harriers Association).

HANI supports many of the changes made to the draft regulations following the public consultation and published in the document "*Outcome of Consultation*" circulated by DARD on 24th July 2012. However, in relation to some points discussed at the recent stakeholders' event we would 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. Good breeding practice should promote life-long health in the resultant pups / dogs. *Hunt clubs 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. Their hounds are retained in packs for their working lives. Selection of breeding stock and life-long management of hounds is tailored to maintain hounds in the best possible condition - essential for effective hunting. It is our opinion that there is no need for them to be included as Dog Breeding Establishments.*

Registered 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 will be obliged to conform to the

general requirements 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. The annual block licence issued to the hunts by the council ensures the micro-chipping records can be required to be produced for inspection by the dog warden. *Even with an exemption in place hunts would still be subject to such scrutiny. 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 good practice for keeping of dogs for breeding could be inappropriate for the welfare of working hounds.*

HANI supports the recommendations made by the Welfare of Animals Act Team regarding mating regulations. We believe condition 8 should remain as published within the revised proposals: i.e. *to allow the breeding of three litters in three years, and also to permit the breeding of a bitch after the age of 8 years, on condition that on each such occasion a veterinary surgeon certifies that the bitch is in good health to breed.*

We therefore strongly suggest that the Agriculture Committee should retain the exemption from 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 sincerely,

 (Chairman)