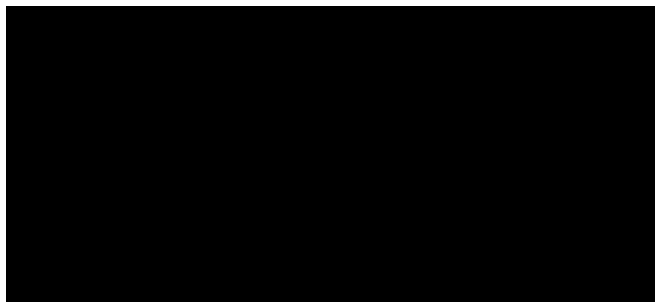


# ***Irish Coursing Club***



**Mr Paul Frew MLA  
Room 359-H  
Parliament Buildings  
Ballymiscaw  
Stormont  
Belfast BT4 3XX**

October 1 2012

***Re: The Welfare of Animals (Dog Breeding Establishments) Regulations [Northern Ireland] 2012.***

Dear **Mr. Frew**,

Thank you for the opportunity to further communicate the views of the greyhound community in regard to the above regulations and in particular how best to ensure an appropriate outcome that promotes compliance to enhance welfare standards.

I was part of the group chaired by **Mr Joe Byrne, MLA** as part of the Roundtable discussions held on September 18<sup>th</sup> at Stormont.

Following our groups discussion, **Mr Byrne** offered the view that separate legislation may be required for greyhounds as it is difficult to adopt the "one size fits all" position for reasons I outline below:

- *Given the fluid and very active relationship between the greyhound industry both North and South, it is prudent to consider the rationale for promulgating legislation which mirrors the South's Greyhound Welfare Act 2011.*
- *It is important to recognise the legislation in the South and to adopt some form of commonality to ensure compliance rather than evasion.*
- *Both of the above would also ensure one jurisdiction did not benefit/suffer due to inconsistencies which may be exploited.*
- *The commencement of the greyhound breeding cycle is largely dependent on when the breeding greyhound ceases racing and when she comes in season. This would differ greatly with other breeds captured under this draft legislation.*

- *Greyhounds are not permitted to be mated prior to 15 months of age and will not be accepted by the Keeper of the Irish Greyhound Stud Book for registrations purposes.*
- *Greyhound bitches will only be bred more than six times if their progeny are performing at a high level. Most breeders will assess the performance of the pups and the relative demand for future pups and the health status of the brood before any subsequent matings.*
- *Greyhounds homed on retirement are neutered as they tend to be homed by greyhound homing groups or through the Retired Greyhound Trust in the Republic.*
- *A retired unneutered greyhound would most very likely not be bred again as once they have reached the maximum permitted number of litters, they would not be accepted by the Irish Greyhound Stud Book and therefore attract no value and would cease to be in demand. This would also reduce the requirement to legislate for compulsory neutering of greyhounds.*
- *Greyhounds are tattoo earmarked and all stud dogs and brood bitches are DNA profiled.*
- *Micro-chipping of greyhounds in the North is not a requirement until January 2013.*
- *The ICC is in discussions with the Irish Greyhound Board (regulators of greyhound racing in the South) with a view to introducing micro-chipping on an all-Ireland basis with the appropriate data base, similar to the UK system.*

**Based on the foregoing, the following elements of the Welfare of Greyhounds Act 2011, enacted after comprehensive consultation with the leading dog welfare groups, would certainly enhance the final outcome of this Bill:**

- (1) *A person who causes or permits a greyhound bitch to be mated, inseminated or otherwise used for breeding purposes unless the bitch has reached the age of 15 months commits an offence.*
- (2) *A person who causes or permits a greyhound bitch to give birth to more than 6 litters during her lifetime or, if subsection (3) applies, 8 litters, commits an offence.*
- (3) *A person may permit a greyhound bitch to give birth to no more than two additional litters to the 6 referred to in subsection (1) if, prior to a mating or insemination leading to such birth the following conditions are met:*
  - (a) *A veterinary practitioner certifies that the pregnancy and birth do not present a risk to the health or welfare of the bitch;*
  - (b) *The certificate is lodged with the Irish Coursing Club (Keeper of the Greyhound Stud Book).*

The Act also provides for the establishment of a Code of Practice for the purpose of providing practical guidance relating to the welfare of greyhound and related matters.

All of the above suggestions will enhance the overall effectiveness, monitoring capabilities and compliance of stakeholders when the Act is in force.

I am available to provide more detail or explanations at your request.



Chief Executive/Secretary  
Keeper of the Irish Greyhound Stud Book

Cc Mr Joe Byrne MLA & DARD Committee members