Northern Ireland Assembly

Research and Information Service
Review of Costs

Paper 57/26 | 4 September 2026 | NIAR 148-26

Review of Costs: Hunting with Dogs Bill

RaISe

Seeking to support Northern Ireland Assembly scrutiny, this Review of Costs addresses key “public purse” implications that could arise from the Hunting with Dogs Bill, if enacted and implemented as introduced.

This information is provided to Members of the Legislative Assembly (MLAs) in support of their duties, and is not intended to address the specific circumstances of any particular individual. It should not be relied upon as professional legal advice, or as a substitute for it.

Key Points

- The Hunting with Dogs Bill (the Bill) was introduced by a Member of the Legislative Assembly (MLA) into the Northern Ireland Assembly (the Assembly) on 27 April 2026.
- The MLA's Bill would create a statutory framework prohibiting specified hunting with dogs activity in Northern Ireland, if enacted and implemented as introduced.
- It would: establish offences relating to hunting wild mammals, trail hunting and terrier work; set out exemptions; provide for the Police Service of Northern Ireland and the Department of Agriculture, Environment and Rural Affairs (DAERA) enforcement; and, require the DAERA to review the legislation every five years.
- The Bill has been introduced within a challenging public finance environment, characterised by significant budgetary pressures across Northern Ireland Executive departments and ongoing concerns regarding Budget sustainability.
- The DAERA and the Department of Justice (DoJ) would be the principal departments likely to incur potential implementation and enforcement costs. Both would be involved in implementing the Bill if enacted as introduced
- The available evidence suggests possible additional public purse costs for the DAERA, the Police Service Northern Ireland (PSNI), the Northern Ireland Courts and Tribunals Service and the Northern Ireland Prison Service.
- Relying on available sources at the time of writing, no Northern Ireland department or relevant body had estimated of potential costs of the Bill, if enacted and implemented as introduced.
- RaISe understands DAERA has not undertaken such an assessment, and will first have to establish the specified roles for the PSNI and the DAERA Wildlife Inspectors with regard to the Bill's implementation.[1]

[1] RaISe email correspondence with DAERA 19 May 2026.

- The PSNI recently advised RaISe that it does not hold relevant costing or staffing data, but noted any costs would be absorbed within wider policing duties.
- For a comparative perspective, Scottish legislation provides a helpful relevant perspective. Looking at the enactment of similar Scottish legislation, the Explanatory Note accompanying that legislation – when proposed – stated no “meaningful” additional cost would arise for the Scottish Government. While Scotland’s experience since enacting that legislation suggests a possible, but modest, increase in court activity. Moreover, estimated additional annual costs in Scotland ranged from: £28,216 to £126,972, excluding licensing; and, £57,716 to £244,972, including licensing. Licensing was the largest estimated cost pressure., It is important to note that the Bill introduced here in Northern Ireland does not include a Scottish-style licensing regime. Moreover, enforcement arrangements, prosecution levels and sentencing outcomes may differ
- In England and Wales 1,100 individuals were proceeded against under the Hunting Act since its enactment, of which 640, or 58% were convicted. The majority of those convicted received a fine. Total fine income between 2005 and 2025 was £176,700.
- Potential public purse implications of the introduced Bill, if enacted and implemented, would depend on the number of complaints, investigations, prosecutions and convictions, and whether custodial sentences would be imposed.
- Prison costs are a further consideration in this area, as volume of convictions and custodial sentences would concern public purse implications. For example, if their volume increased, then such costs would be likely to increase; and vice versa. Northern Ireland’s reported cost per prisoner place in 2024/25 was £57,180.
- Also, any income generated by specified fines in the Bill, if enacted and implemented as introduced, remains uncertain. Nonetheless, whatever that income would be, it would be paid into the Northern Ireland Consolidated Fund.

- The Bill, however, does not specify any mechanism for use of that income – for example, the DAERA or the DoJ directly using such income to offset implementation or enforcement costs when implementing the Bill.

Contents

Introduction

This Review of Costs aims to support Northern Ireland Assembly Members in their plenary, committee and constituency capacities, when scrutinising key 'public purse' implications that could arise from the Hunting with Dogs Bill[2] (the Bill) – as introduced by Mr Blair, MLA (the Bill Sponsor) into the Northern Ireland Assembly on 27 April 2026.[3] The Bill seeks to prohibit the use of dogs to hunt, attack or kill wild mammals and to "close off any loophole where trail hunting is used as smokescreen for illegal hunting".[4]

This Review of Costs relies on sources available the Assembly's Research and Information Service (RaISe) at the time of writing, including: the introduced Bill; its accompanying Explanatory and Financial Memorandum (EFM); costing exercises undertaken by the Scottish Government for similar legislative change; and, other sources of publicly available information. It should be read in conjunction with the RaISe Bill Paper "The Hunting with Dogs Bill" (NIAR 196-25), dated 4 September 2026.

It begins with background information to contextualise the Bill and its potential future implementation if enacted as introduced; providing a brief recap of its Clauses; defining terminology and providing brief overviews of the Northern Ireland's challenging public finance context, followed by an overview of the introduced Bill's underlying objectives; before looking at England and Wales, and Scotland's experience in the area, to provide a comparative basis. Thereafter, the Review of Costs explores the Bill's key potential public purse implications; followed by key takeaways when scrutinising this Bill. It is presented using the following section headings:

[2] *Hunting with Dogs Bill*, as introduced (27 April 2026). Available here.
[3] Hunting with Dogs Bill: First Stage (27 April 2026) Official Reports
[4] Hunting with Dogs Bill EFM - As Introduced

5. Key takeaways

Any discussion in this Paper about legislation is not intended to provide legal advice or opinion. Instead, it seeks to orientate the Paper's discussion. Identified key potential public purse implications are not intended to provide an exhaustive list due to existing uncertainties, including those relating to future economic conditions and human behaviour.

For wider social or policy considerations relating to the Bill, refer to RaISe Bill Paper NIAR 196-25, dated 4 September 2026.

1 Recap of introduced Bill

Table 1 below sets out a summary of the introduced Bill's 14 Clauses. In short, its Clauses define hunting with dogs, create new offences concerning the activity, set out exemptions to the offence of hunting with dogs, enable PSNI and DAERA enforcement of the offences, and require the DAERA to review the functioning of the Bill, if enacted and implemented as introduced.

Table 1: Summary of the Bill as introduced[5]

Clause	Effect of Clause if enacted
1	Defines the terms “hunting with dogs” and “wild mammal”
2	Seeks to create the offence of hunting a wild mammal with one or more dogs, to organise or participate in such hunting, and for a owner or occupier of land to permit a person to hunt on their land
3	Creates an offence of organising or participating in a trail hunt with one or more dogs.
4	Creates an offence to organise or participate in terrier work using one of more dogs.
5	Specifies the penalties for committing the offences that would be created under Clauses 2, 3, and 4 if enacted.
6	Creates an exemption to the hunting of rats and mice to Clause 2.
7	Exempts “the management of wild mammal above ground” from the offence that would be created by Clause 2
8	Exempts “reliving the suffering of injured wild mammals” from the offence that would be created by Clause 2
9	Exempts “searching for dead wild mammals” from the offence that would be created by Clause 2
10	Exempts “training dogs to follow an animal-based scent” from the offence that would be created by Clause 2
11	Amends the Wildlife (Northern Ireland) Order 1985 to enable PSNI enforcement of the offences that would be created by Clauses 2, 3, and 4. Enables Departmental Wildlife Inspectors to enter premises to determine if an offence created by Clauses 2, 3, and 4 had occurred.
12	Requires the DAERA to review and report on the operation of the Bill once every five years.
13	Set out the Commencement date.
14	Set out the Bill’s short title.

[5] *Hunting with Dogs Bill*, as introduced (27 Apil 2026). Available here.

2 Public finance context in Northern Ireland

Before considering key public purse implications that could arise from the introduced Bill, some additional public finance context-setting is provided to highlight the challenging financial and budgetary context in which Assembly Members considers this introduced Bill.

2.1 “Public Purse” defined

In Northern Ireland, the “public purse” encompasses the Northern Ireland Block Grant from His Majesty’s (HM) Treasury; revenues raised regionally; and other funding sources. The Northern Ireland Executive is responsible for allocating those monies through the Executive Budget, which it is to do so in line with the financial arrangements under current devolution, including requirements specified in the Budget Sustainability Plan and the accompanying Budget Improvement Plan Roadmap, which collectively aim to improve Northern Ireland public finances, while seeking to balance numerous competing priorities and demands for limited available funding.

Any public purse costs that could arise from the Bill be met by departmental spending – that is, either within the existing DAERA, DoJ and PSNI budgets, or through reprioritisation within the Executive’s overall spending envelope.

2.2 Budgetary Context – central and devolved – generally speaking

The central and devolved budgetary contexts remain challenging across the United Kingdom, due to a number of contributory factors that are relevant to Assembly consideration of this Bill. **Table 2** below summarises the most significant developments from February 2024 to the time of writing.

Table 2: Challenging budgetary context - Contributory factors dating from February 2024 to present

Date	Contributory Factors
February 2024 to date	Since the restoration of the Executive in February 2024, Departments have been undertaking work to facilitate the Executive's implementation of political and financial agreements - such as the Interim Fiscal Framework (May 2024), the Budget Sustainability Plan (October 2024) and the accompanying Budget Improvement Plan Roadmap (December 2024), as well as the establishment of Interim Transformation Board (March 2025). These measures have been broadly targeted to improve the position of Northern Ireland's public finances
August - September 2024	The Department of Finance (DoF) undertook a 2025-28 Budget Information Gathering Exercise, requesting returns from all Northern Ireland Departments, marking the start of the planning stage in the 2025/26 Northern Ireland Executive Budget cycle. The DoF found that “Departments identified a reported £767 million of unfunded pressures”, as reported to the Assembly on 23 September 2024.
October 2024	The Chancellor’s Autumn Budget 2024 set out some of the multi-year competing pressures facing the United Kingdom Government, potentially adversely impacting the Government’s spending power in certain areas, along with other decisions relating to social security - see RaISe Briefing Paper 47/24 entitled “Chancellor’s Autumn Budget 2024: initial considerations for Northern Ireland”.
December 2024	Northern Ireland Departmental bids for 2025/26 resource and capital expenditure exceeded the Northern Ireland Budget allocated by the United Kingdom Government to the Executive. Later that month, the 2025/26 Draft Executive Budget and accompanying Written Statement by the Minister for Finance highlighted ongoing “pay and inflationary pressures” and “growing demands” on public services.

Date	Contributory Factors
March 2025	The Chancellor's 2025 Spring Statement announced a number of policy decisions, which included reforms to the welfare system, increased defence spending and a £3.25 billion "Transformation Fund" to reform public services. (Note: this is a central government development - the Northern Ireland Executive Budget is a sub-cycle within the United Kingdom Government's Budget cycle.)
1 April 2025	DoF officials thereafter explained during the Assembly Finance Committee meeting that: *…. on the allocations out of that fund, it will depend on which Whitehall departments get allocations from it so we don't get it on the £3.25 billion we'll get it on the allocations*
3 April 2025	The Executive agreed the 2025/26 Executive Budget, which as the Finance Minister described "sets out a direction of travel" which "clearly prioritises its Programme for Government priorities".
4 April 2025	The American President announced substantial international trade tariffs, resulting in: plummeting stock markets across the globe; a collapsing American bond market; the subsequent 9 April 90-day pause on some new US tariffs; other countries' similar pauses; further consideration of retaliatory tariffs on the US; and an international trade war arising between the US and China.
8 May 2025	A non-binding trade deal was agreed by between the US and UK Governments. The general terms of the new trade deal where subsequently published in the UK-US Economic Prosperity Deal (EPD); the deal non-binding, meaning on-going further negotiations to work through the detail of the deal.
24 June 2025	The DoF published its 2025-26 Budget Factsheet, setting out the Executive's spending plans for the one-year period from 1 April 2025 to 31 March 2026.
3 October 2025	The Executive's Finance Minister provided a Written Ministerial Statement detailing Treasury Funding Available 2026-2029/30.

Date	Contributory Factors
26 November 2025	The Chancellor’s Autumn Budget 2025 detailed the United Kingdom Government’s resource spending plans up to 2028/29 and capital plans up to 2029/30.
6 January 2026	The Finance Minister published the Draft Budget 2026-2029/30 (not Executive agreed) and announced an eight-week public consultation on the proposals. The Education Minister responded to the Draft Budget 2026-2029/30, stating: *While I acknowledge the significant challenges involved in setting a budget, it is important to be clear: even if I was prepared to accept the devastating cuts implicit in this draft, as a practical matter, such a budget would be undeliverable. A budget must be more than figures on paper; it must be deliverable in reality.* The Minister continued: *Under the proposed allocations, my Department would be required to make savings of approximately £826 million in 2026-27, £1.01 billion in 2027-28, and £1.15 billion in 2028-29. These levels of reduction are simply not achievable.*
11 February 2026	HM Treasury agreed a reserve claim for the Northern Ireland Executive, to provide £400 million for 2025/25, which is to be repaid over three years. The Finance Minister confirmed in a written statement that same day that the £400 million would be allocated as follows, as agreed by Executive: - Department of Education - £214.6 million - Department of Health - £185.4 million

Date	Contributory Factors
3 March 2026	On 3 March 2026, the Chancellor delivered her Spring Forecast 2026 Later that day, in an Oral Statement to the Assembly, the Finance Minister confirmed additional £390 million Barnett consequentials over the next three-year period, comprising: Resource DEL - £380 million; and, Capital DEL - £9 million.
16 April 2026	Speaking publicly following a meeting of Executive Ministers, the deputy First Minister stated that the Executive wanted a multi-year Budget agreed "as quickly as we can". She added, *"...but the reality is that there is a very, very significant shortfall...the moment that Budget would be agreed, unless we secure additional resource from the Treasury, would simply lead to significant cuts and massive impacts in terms of our public services and on the people that we are here to serve."* The Finance Minister echoed these sentiments, stating that *"to achieve the ambition of the Budget is going to take an injection of investment from the British Government."*
2 July 2026	Executive Parties meet the SoSNI on Budget Progress. Speaking after the meeting, Hilary Benn MP said they had 'agreed a programme of work' that will 'look, first of all, at the pressures that the Executive's finances are facing'. He said the work would also look at the Executive's plan for "fiscal sustainability, efficiencies and public service transformation".
31 July 2026	Budget Act Deadline Passes. As the Executive were unable to pass a Budget by this deadline, an automatic departmental expenditure limit of 95% of last year's funding was triggered under public finance laws.
13 August 2063	The SoSNI Chris Bryant MP stated, the Executive will have to engage in “self-help” and look at revenue raising to resolve Northern Ireland’s budget issues. He further added “I understand the financial pressures that there are in Northern Ireland, and I’m very happy to take them very seriously”.

Date	Contributory Factors
2 September 2026	In response to a question at PMQ's the PM stated: "Our first responsibility is to get Stormont government up and running and functioning properly with a budget. I have empowered the Northern Ireland Secretary to go into talks to resolve that issues, and we can continue the conversation on the boarder issues about reform once we have got that in place."

Source: Compiled by RaISe, relying on links in table (2026)

2.3 Draft Budget allocations – DoJ and DAERA

The Draft Budget 2026-2029/30 public consultation document - published by the Northern Ireland Finance Minister on 6 January 2026 - closed on 3 March 2026. That document outlined Departmental proposed allocations for the specified period, including DAERA and the DoJ – both departmental allocations relevant for purposes of the introduced Bill, in terms of RDEL and CDEL, as well as previous Executive commitments and Executive earmarked, as detailed below in Tables 1 and 2. Both would be involved in implementing the Bill if enacted as introduced.

Table 1: Draft Budget 2026-2029/30 – DAERA and DoJ RDEL allocations (£ millions)

Department	2026-27	2027-28	2028-29
DAERA	674.3	687	692.9
DoJ	1,575.4	1,497.2	1,525.7

Source: Department of Finance (2026)

Table 2: Draft Budget 2026-2029/30 – DAERA and DoJ CDEL allocations (£ millions)

Department	2026-27	2027-28	2028-29	2029-30
DAERA	123.0	130.3	126.3	121.1
DoJ	118.2	116.5	113.5	122.8

Source: Department of Finance (2026)

It should be noted that the DoJ raised concerns about the proposed allocations set out in the Draft Budget. In evidence to the Committee for Justice, summarised in its Response to the Committee for Finance on the Draft Budget, the Department highlighted both “stabilisation pressures” and “exceptional pressures” over the multi-year period. Stabilisation pressures were identified on the day-to-day running cost of business areas across the Department. The exceptional pressures were stated to be unaffordable within the Draft Budget allocation “under any circumstances”. Pressures falling into this category included pressures arising from “Holiday Pay and McCloud cases”. Evidence to the Committee for Justice also highlighted the concerns of DoJ non-departmental bodies. Within the context of this briefing, those NDPBs included the PSNI, who noted that budgetary allocation fell short of what was “required to cover anticipated pay increases and price inflation”.[6]

Similar detail is not available from the DAERA. The Committee for Finance’s “Report on the Minister for Finance’s 2026-29/30 Draft Budget” (dated 15 April 2026) noted that:

> *The Committee for Agriculture, Environment and Rural Affairs was advised that officials from the Department of Agriculture, Environment and Rural Affairs are continuing to work through the draft budget with the Minister and, consequently, have (to date) been unable to attend an evidence session with the Committee that would have enabled Members to undertake scrutiny. Accordingly, the Committee agreed to write to the Finance Committee to advise that, at this stage of the process, it is unable to take a position on the draft budget.*[7]

No additional subsequent commentary from the DAERA on the Draft Budget could be located in the Official Report of the Assembly or of the Committee for Agriculture, Environment and Rural Affairs (CAERA) at the time of writing.

[6] 20260227-committee-for-justice-response---budget-2026-27-to-2029-2030_redacted.pdf
[7] Report on the Minister for Finance’s 2026-29/30 Draft Budget

Potential Scrutiny Point:

1. Given the existing budgetary challenges and competing pressures in Northern Ireland, how would the DoJ and the DAERA ensure that appropriate resourcing is allocated to fully implement the Bill's provisions, should it be enacted and implemented as currently introduced?

3 Comparative perspective

To provide a comparative perspective when scrutinising the introduced Bill, this section draws on the experience of other jurisdictions, including their legislative frameworks, as well as any relevant costing exercises available to RaISe-PFSU at the time of writing.

This section provides a comparative perspective; looking at the similar legislative frameworks prevailing in England and Wales and in Scotland, along with their cost implications, to help inform scrutiny of the introduced Bill. Such legislation is called the Hunting Act 2004 in England and Wales and the Hunting with Dogs (Scotland) Act 2023 in Scotland.

For a more detailed examination of how those Acts compare with the introduced Bill, refer to the RaISe Bill Paper NIAR 196-25, dated 4 September 2026

3.1 England and Wales

The Hunting Act 2004 (the 2004 Act), criminalised certain aspect of hunting in England and Wales. The 2004 Act came into force on 18 February 2005 and created five offences:

1. Hunting a wild animals with one or more dogs
2. Permitting land to be used for hunting a wild mammal with a dog
3. Permitting a dog to be used for hunting a wild mammal with a dog
4. Participating in, attending , facilitating or permitting land to be used for the purposes of hare-coursing

5. Entering, permitting or handling a dog in a hare-coursing event[8]

The above offences are different than those that would be created by the Bill if introduced. For example, the 2004 Act did not introduce offences for trail hunting or terrier work as proposed by the Bill.

Certain types of hunting are exempt from the above. Those are:

- Stalking and flushing out a wild mammal for certain purposes, with a view to its being shot forthwith, and not using more than two dogs
- Use of not more than one dog at a time below ground in the course of stalking or flushing to protect birds for shooting
- Hunting rats and rabbits
- Retrieval of shot hares
- Flushing a wild mammal from cover in connection with falconry
- Recapture of accidentally escaped wild mammal
- Rescue of wild mammal believed injured using not more than two dogs and no dog below ground
- Observation and study of a wild mammal, using not more than two dogs and no dog below ground[9]

A person found guilty of an offence under the 2004 Act “shall be liable on summary conviction to a fine not exceeding level 5 on the standard scale”. A level 5 fine was raised from £5,000 to unlimited by section 85 of the Legal Aid, Sentencing and Punishment of Offenders Act 2012, which came into force on 12 March 2015.[10][11]

Annex 1 provides an overview of the number of individuals proceeded against under the 2004 Act between 2005 and 2025. In that period, 1,100 individuals were proceeded against, of which 640, or 58% where convicted. The majority of those convicted, 578, had to pay a fine. The table also shows the average fine and total fine income for each year, which ranged from £231 in 2017 to £568 in

[8] Hunting Act 2004
[9] Hunting Act 2004
[10] Legal Aid, Sentencing and Punishment of Offenders Act 2012
[11] Hunting Act 2004 Offences | Wheldon Law

2022. Total fine income ranged from £1,900 in 2005 to £16,100 in 2012. Total fine income from the Act's introduction to 2025 was £176,700. As noted above, on 12 March 2015 the maximum specified fine under the 2004 Act increased from £5,000 to an unlimited fine. Despite that statutory increase, the average fine for each year was below £1,000.

3.2 Scotland

When similar legislation was proposed in Scotland, the Bill's accompanying EFM explained that:

> *The proposed legislation seeks to reflect aspects of the Hunting with Dogs (Scotland) Act 2023 ('the 2023 Act'). This Act addresses recognised loopholes in the Hunting Act (England and Wales) 2004 ('the 2004 Act'), such as the use of trail hunting as a smokescreen for illegal hunting.*

In this sense, the Bill is similar to the Scottish 2023 Act. It is not, however, a reproduction of the Act in scope or scale. There are notable differences between the Scottish 2023 Act and the Bill. Those differences are explored in greater detail in the RaISe Bill Paper NIAR 196-25, dated 4 September 2026. For context, it worthwhile to draw attention to some of the high-level differences between the two:

- **Types of hunting within the scope of legislation:** The Scottish 2023 Act made provision regarding:
    1. Hunting a wild mammal using a dog, wherein "hunting" was defined as including "searching for and coursing".
    2. Trail hunting, defined as an "activity in which a dog is directed to find and follow an animal-based scent which has been laid for that purpose".

  Whereas the introduced Bill here in Northern Ireland, if enacted and implemented as introduced, would make provision regarding:
    1. Hunting a wild mammal using a dog, which is defined to include "searching for and pursuing".
    2. Trail hunting, defined as "inducing or permitting one or more dogs to follow an animal-based scent".

   3. Terrier work, defined as “inducing one or more dogs to enter a hole in the ground, or an enclosed space” to flush out a wild mammal or make it easier to dig a wild mammal out of the space.

- **Offences:** The range of offences created by the Scottish Act 2023, and those introduced by the Bill if enacted as introduced would differ. The Scottish Act introduced the following offences:
   1. Hunting a wild mammal with a dog, except when an exemption applies.
   2. Knowingly causing or permitting another person to hunt using a dog.
   3. Providing false information to obtain a licence.
   4. Engaging or participating in “trail hunting”.
   5. Knowingly causing or permitting another person to engage or participate in trail hunting.

  Whereas the Bill would, if enacted and implemented as introduced, would create the following offences:
   1. To hunt a wild mammal with one of more dogs, or to organise or participate in the hunting of a wild mammal using one or more dogs, except when an exemption applies.
   2. To knowingly cause or permit another person to hunt a wild mammal using one or more dogs.
   3. To organise or participate in a trail hint, except when an exemption applies.
   4. To organise or participate in terrier work.
- **Exemptions:** There are different exemptions to the offence of hunting a wild mammal using a dog in each piece of legislation. The Bill includes five exemptions to the offence of hunting a wild mammal using a dog – those are:
   1. The hunting of rats or mice.
   2. The management of wild mammals above ground.
   3. Relieving the suffering of injured wild mammals.
   4. Searching for dead wild mammals.
   5. Training dogs to follow an animal-based scent.

  The Scottish Act 2023 included the following six exemptions:

1. The management of wild mammals above ground.
2. The management of foxes below ground.
3. Falconry, game shooting and deer stalking.
4. Reliving the suffering of injured wild mammals.
5. Searching for dead wild mammals.
6. Environmental benefit.

The Scottish Act 2023 also included an exemption to the offence of trail hunting - that is, when “training dogs to follow an animal-based scent”.

- **Licences:** The Scottish 2023 Act created a licensing regime, whereby individuals could apply for permission to use more than two dogs for the “management of wild mammals above ground” and a licensing regime whereby a licence may be obtained for hunting with dogs for environmental protection purposes[12]. However, no such licence regime is proposed in the Bill as introduced.

- **Penalties:** The penalties for committing an offence introduced by the Scottish 2023 Act differ from those proposed in the introduced Bill in both the level potential fine and potential prison term. For example, the offence of hunting with dogs in the Scottish 2023 Act carried a maximum penalty of imprisonment of 12 months or a fine of up to £40,000, or both on summary conviction. On conviction, indictment the maximum prison term is five years. The penalties proposed in the Bill as introduced are the same in terms of imprisonment. The proposed maximum fine is lower; however, the Bill specifies a limit of £20,000.
- **Court Orders:** The Scottish 2023 Act includes a list of potential orders the court may make when a person is convicted of an offence. Those include deprivation orders, which can be used to deprive a person of a horse or a dog. The Scottish 2023 Act also provides the court with the power make an order to disqualify an individual from owning or keeping a dog, and to make an order to seize a dog, where a person is in breach of

[12] Defined as “preserving, protecting” a “particular species” or “the diversity of animal or plant life”, and “eradicating an invasive non-native species of wild mammal from an area”.

a disqualification order. No such provisions are included in the introduced Bill here in Northern Ireland.

Given the differences highlighted above, the costs identified in Scotland are not directly relevant in a Northern Ireland context. As such, the costs identified in Scotland should be considered indicative, rather than authoritative.

Turning to the costs identified in Scotland: the Scottish 2023 Act was accompanied by a Financial Memorandum (FM), which contained an analysis of the potential cost of the legal changes that proposed legislation that would arise if the introduced Bill would be enacted and implemented as introduced. Those costs were considered across a range of categories, including:

- Introductory one-off costs.
- Cost of Court procedures.
- Costs to the Scottish Prison Service (SPS).
- Cost of licensing.
- Costs on local authorities.
- Costs on other bodies, individuals and businesses.[13]

The following sub-sections provide a brief overview of the potential costs identified in each category, which relates to the Scottish public purse (in other words all apart from the final category – costs on other bodies, individuals and businesses).

3.2.1 Introductory one-off costs

The FM stated the proposed changes to Scottish law that were ultimately enacted in the Scottish 2023 Act would not result in "any meaningful costs for the Scottish Administration". The rationale for this conclusion was as follows:

- The proposals would repeal and replace existing legislation and that staff training would require only "a relatively simple update of guidance and procedures" on enforcement of offences and the operation of the licensing regime.

[13] Hunting with Dogs (Scotland) Bill Financial Memorandum (2022)

- The proposals would not change the way Police Scotland would "report cases, and respond to complaints by the public".
- Individuals prosecuted for offence would be responsible to "their own legal expenses in the usual way", while "persons of limited means" would be eligible to seek legal aid.

3.2.2 Costs of court procedures

The FM noted that between 2012 and 2022, 70 individuals were prosecuted under the Scottish 2002 Act, or seven cases on per year on average over the ten yar period. It assessed that the Scottish 2023 Act would "initially result in a small increase in courts cases of hunting a wild mammal using a dog", but that:

> *…the broader expectation is of a longer-term reduction in the total number of cases as a result of clearer legislation, thereby removing any doubt as to what constitutes an offence or not[14].*

The potential cost arsing from an increase in court cases were anticipated to fall on three Scottish organisations, namely:

- The Crown and Procurator Fiscal Service (COPFS)
- The Scottish Courts and Tribunals Service (SCTS)
- The Scottish Legal Board (SLAB)

Total estimated costs for those organisations were based upon the average cost court procedures incurred by each. The FM did not disaggregate the final total costs cost of court procedures by organisation and specified assumptions, to estimate aggregated costs for prosecutions as follows:

- A three-fold prosecution increase estimated based on the current baseline - a £15,904 total additional cost.
- A five-fold increase - a £31,808 total additional cost.
- A ten-fold increase - a £71,568 total additional cost.[15]

[14] Hunting with Dogs (Scotland) Bill Financial Memorandum (2022)
[15] Hunting with Dogs (Scotland) Bill Financial Memorandum (2022)

The Scottish Government's Wildlife Crime in Scotland 2024 (February 2026) dataset shows:

- A total of 73 hunting with dogs offences were recorded by Police Scotland in 2023/24, which fell to 22 in 2024/25. The larger number in 2023/24 was a result of an "unusually high number of offences [50] recorded in Fife" during that year, which where attributed to an investigation against one individual.[16]
- The same data shows that the number of individuals "proceeded against" in 2023/24, or in other words the number of people facing court action, as a result of hunting with dogs was 26.
- Based on seven cases on average per year between 2012 and 2022, 26 individuals being proceeded against represented just short of a four-fold increase (a 3.7-fold increase).[17] As such, this was in line with the lower end of the cost estimates set out above. Data for the year 2024/25 was not available at the time of writing, meaning that the sample size is limited and it is not yet possible to establish any trends.

3.2.3 Scottish Prison Service

The FM also identified potential costs to the Scottish Prison Service (SPS), arising from an increase in custodial sentences as a result of the new offences introduced by the act. The FM calculated cost based on previous sentences under the Protection of Wild Mammals (Scotland) Act 2002 (the Scottish 2002 Act). It noted that between 2012 and 2022, there had been 4 custodial sentences under the Scottish 2002 Act, equal to 0.4 per year. The average sentence length for those 4 custodial sentences was 147. Based on these figures and an average cost of a year in prison in Scotland of £38,213 per year (based on 2020 data), the FM estimated potential maximum additional costs per year to the SPS as follows:

- A three-fold increase in custodial sentences, or 1.2 custodial sentences, could lead to a maximum additional cost of £12,312 per year.

[16] Wildlife Crime in Scotland 2024 - gov.scot
[17] Figures+-+Wildlife+Crime+in+Scotland+2024.xlsx

- A five-fold increase, or 2 custodial sentences, could lead to a maximum additional cost of £24,624 per year.
- A ten-fold increase, or 4 custodial sentences, could lead to a maximum additional cost of £55,404 per year.[18]

The Wildlife Crime in Scotland 2024 dataset showed zero people “with a charge proved for wildlife crime in Scottish Courts” had received a custodial sentence in 2023/24, which is broadly in line with the baseline set out above.[19] As was the case with the data on court proceedings covered in sub-section 3.2.2 of this Paper (above), data for the year 2024/2025 was not available at the time of writing; nor has sufficient time passed since the enactment of the 2023 Scottish Act to investigate longer-term trends.

3.2.4 Cost of Licensing

Nature Scotland is responsible for licensing in relation to a range of wildlife legislation in Scotland. The body is responsible for licensing under the Scottish 2023 Act. The FM prepared in advance of the Act’s passing noted that the average cost to Nature Scotland of processing a licence was £113. It did not estimate the precise number of licences that were expected to result from the Scottish 2023 Act. It also noted that Nature Scotland would be required to issue licensing guidance and to review licensing decisions; the latter activity costing between £1,000 and £1,200 per review on average.[20] Based on these figures, the FM calculated the potential costs summarised in Table 3 below:

[18] Hunting with Dogs (Scotland) Bill Financial Memorandum (2022)
[19] Figures+-+Wildlife+Crime+in+Scotland+2024.xlsx
[20] Hunting with Dogs (Scotland) Bill Financial Memorandum (2022)

Table 3: Cost to Nature Scotland arising from licence applications[21]

	2022 Baseline	+250 licences	+500 licences	+1,000 licences
Number of licences	2,800	3050	3300	3800
Annual costs of licences	£316,400	£344,650	£372,900	£429,400
Total additional cost of licences	**£0**	**£28,250**	**£56,500**	**£113,000**
Number of appeals	12	13	14	16
Annual cost of appeals	£15,000	£16,250	£17,500	£20,000
Total additional annual cost of appeals	**£0**	**£1,250**	**£2,500**	**£5,000**
Total cost	£331,400	£360,900	£390,400	£449,400
Total additional cost to Nature Scotland	**£0**	**£29,500**	**£59,000**	**£118,000**

Source: Hunting with Dogs (Scotland) Bill Financial Memorandum (2022)

Data produced by Nature Scotland as part of its Hunting Licensing Review 2024 (published in December 2025) showed the number of licence applications (received in the financial years 2023/24 and 2024/25) had fallen short of the anticipated lowest estimates utilised in the FM (£28,250 additional annual cost resulting from an extra 250 licences). In 2023/24 the organisation dealt with 72 hunting with dogs licence applications. Based on the FM's stated £113 cost of processing a licence, those 72 applications would have an expected total additional cost of £8,136. In 2024/25, the organisation dealt with 89 licence applications, with an expected cost of £10,057. The 2024 Review did not include data on the number of licence decisions reviewed in either 2023/24 or 2024/25.[22]

[21] Hunting with Dogs (Scotland) Bill Financial Memorandum (2022)
[22] Nature Scotland Licensing Report: Hunting with Dogs Licensing Review 2024 | NatureScot (December 2025)

3.2.5 Cost to Police Scotland, local authorities and "other bodies, individuals and businesses"

The FM for the legislative proposals for the 2023 Scottish Act stated there would not be additional costs to Police Scotland and local authorities. It also stated no additional costs of "other bodies, individuals and businesses".

With regards to Police Scotland, the FM identified zero additional cost and implied that cost would be absorbed by the organisation, stating:

> *Police Scotland will continue to report cases, and respond to complaints by the public in the same way as they do currently.*[23]

With regard to local authorities, the FM identified zero additional cost, stating:

> *The investigation of wildlife crime falls to Police Scotland; local authorities do not enforce any wildlife legislation. The Bill provisions will not introduce any new responsibilities for local authorities and as such will not result in any additional costs to local authorities.*[24]

Similarly, with regard to "other bodies, individuals and businesses", the FM stated:

> *There are no costs on other bodies, individuals and businesses arising from the provisions of the* [Scottish Hunting with Dogs] *Bill.*

The rationale for this conclusion was as follows:

- Individuals and businesses will continue to be able to use two dogs to search for, stalk or flush a wild mammal from cover for a range of purposes, as is the case in current legislation.
- A licence may be sought for those who wish to hunt with more than two dogs.
- Nature Scotland do not charge applicants for licences relating to wildlife management.

[23] Hunting with Dogs (Scotland) Bill Financial Memorandum (2022)
[24] Hunting with Dogs (Scotland) Bill Financial Memorandum (2022)

- Should NatureScot move to a full cost recovery model in the future, the cost of administering the licenses would be balanced out by the revenue received from licence applicants and the scheme would operate on a cost neutral basis.[25]

3.2.6 Summary of additional costs arising from the 2023 Scottish Act

Table 4 below provides a summary of the estimated **additional** annual costs identified as arising from the 2023 Scottish Act; providing a low, medium and high estimates of those costs based on projected increases in the number of court cases, custodial sentences and licenses as result of the Act's provisions (as explained in above sub-section). As licensing is not a feature of the introduced Bill in Northern Ireland, the Table also provides a total cost inclusive and exclusive of licensing. As can be seen from the Table, the FM anticipated licensing would be the most costly element of the changes introduced by the Scottish 2023 Act across all scenarios.

Table 4: Additional annual costs arising from the 2023 Act[26]

Cost category	Low Scenario	Medium Scenario	High Scenario
Court proceedings	£15,904	£31,808	£71,568
SPS	£12,312	£24,624	£55,404
Licensing	£29,500	£59,000	£118,000
Total cost ex. licensing	**£28,216**	**£56,432**	**£126,972**
Total cost inc. licensing	**£57,716**	**£115,432**	**£244,972**

Source: Hunting with Dogs (Scotland) Bill Financial Memorandum (2022)

[25] Hunting with Dogs (Scotland) Bill Financial Memorandum (2022)
[26] unting with Dogs (Scotland) Bill Financial Memorandum (2022)

4 Key potential "public purse" implications

Below considers key potential public purse implications for Northern Ireland that could arise from the Bill, if enacted and implemented as introduced. It draws on publicly available information that is relevant to the Bill proposals, which seek to:

- Create new offences concerning hunting with dogs, trail hunting and terrier work.
- Set out the penalties relating to the new offences.
- Set out exemptions to the offence of hunting with dogs.
- Enable the PSNI and the DAERA enforcement of the new offences.
- Require the DAERA to review and report on the operation of the Bill once every five years.

And as such, the costs of those proposals, if enacted and implemented as introduced, would fall on two Northern Ireland Executive departments - the DAERA and the DoJ.

4.1 EFM for the Introduced Bill

The Explanatory and Financial Memorandum (EFM) accompanying the Bill stated the "Bill itself has no direct financial effects" - but added that:

> *The Bill if enacted, would create a potential 'public impact' impact on departmental resources in terms of general costs and staffing requirements associated with their current inspection and enforcement of their wildlife related duties.*
>
> *The Bill would also have public purse implication with regards to the PSNI [Police Service of Northern Ireland] and their general costs and staffing requirements relating to its existing inspection and enforcement duties specified in the Wildlife Order 1985 and the Natural Environment Act (Northern Ireland) 2011. When asked, the PSNI advised that they were not*

> *in a position to provide estimates of any additional resource requirements that might arise from the Bill.*[27]

The EFM also stated:

> *….fines for non-compliance could help offset enforcement costs and support ongoing monitoring and compliance efforts*

RaISe contacted the DAERA, the (DoJ) and the PSNI, requesting details of any estimated costs that may have been carried out in relation to the introduced Bill None of those organisations were in a position to provide any information at that time. However, the DAERA stated:

> *Officials have been assessing the legal implications for the department on the provisions contained within the Bill. Whilst it is clear that the Bill could have financial implications for DAERA, an assessment has not been carried out at this time as roles and responsibilities of PSNI and Wildlife inspectors will require an agreed position.*[28]

With regard to the above stated assessment of “roles and responsibilities” of PSNI and Wildlife Inspectors, under the Welfare of Animals Act (Northern Ireland) 2011, three bodies – the DAERA Wildlife Inspectors, the PSNI and Local Councils – have specified enforcement duties relating to animal welfare. The Bill, in enacted as introduced, would amend the duties of the DAERA wildlife inspectors. This is explored further in sub-section 4.2

Potential Scrutiny Points:

2. When will the DAERA reach an agreed position on the specified roles and responsibilities of the PSNI and Wildlife Inspectors, and will this be shared with the CAERA?

[27] Hunting with Dogs EFM - As Introduced
[28] RaISe email correspondence with DAERA 19 May 2026.

3. When will the DAERA carry out an assessment of key potential financial implications of the introduced Bill, and will that assessment by shared with the CAERA?

In the absence of information from the Executive departments and other bodies, the following sub-sections draw upon the experiences in Scotland, England and Wales, and data sources in Northern Ireland to explore the potential public purse implications, both in terms of cost and revenue, of the Bill in Northern Ireland.

4.2 DAERA potential public purse implications

The DAERA is the principal Northern Ireland Executive department with responsibility under both the Wildlife (Northern Ireland) Order 1985 (the Wildlife Order) and the Wildlife and Natural Environment Act (Northern Ireland) 2011.

The Bill, if enacted and implemented as introduced, would place new responsibilities on the Department. As noted in section 1, those responsibilities would concern:

- The enforcement of the offences that the Bill would create.
- The reviewing of and reporting on the operation the Bill’s provisions every five year.

In addition to the above, the DAERA has published guidance on laws protecting wildlife in Northern Ireland. That guidance focusses “particularly, but not exclusively”, on the law relating to the Wildlife Order. As the introduced Bill would further amend the Wildlife Order, it seems reasonable to assume that this guidance would require updating.

Each of these new activities would be likely to result in costs to the Department. However, it is unclear at this time as the extent of those costs, and how they would be met. As noted in the introduction to this section, the DAERA has not carried out an assessment of the financial implications of this Bill.

For that reason, the financial assessment carried out by the Scottish Government on the proposals for the Scottish 2023 Act, as set out in sub-section 3.2 of this Paper, noted there would no "meaningful costs" would arise for the Scottish Government. That conclusion was based on the assumption that the proposed provisions would require only "a relatively simple update of guidance and procedures". Given the similarities between the Scottish 2023 Act and the introduced Bill, it seems reasonable to assume the same conclusion could be drawn for the Northern Ireland context.

The introduced Bill would also require the DAERA to review and report on the operation of the Bill should it be enacted and implemented. The CAERA may wish to further explore the financial implications of this on the Department after the DAERA has carried out an assessment of those financial implications.

Potential Scrutiny Points:

4. What would be the estimated costs of the DAERA undertaking and completing a review on the operation of the Bill if it would be enacted and implemented as introduced; and how would those costs be met?

The CAERA may also wish to further explore the role of Departmental Wildlife Enforcement Officers and any related potential public purse implications arising therefrom. The Welfare of Animals Act (Northern Ireland) 2011 (the 2011 Act) split enforcement duties relating to animal welfare across the following three organisations:

- The DAERA became responsible for the enforcement of the 2011 Act in relation to farmed animals.
- Council Welfare Officers became responsible for the enforcement of the 2011 Act in relation to Non-farmed animals" – such as cats, dogs, horses and donkeys.
- The PSNI became responsible for the enforcement of the 2011 Act in relation to wildlife, which would include wild mammals.[29]

[29] Welfare on Animals Act - Sanctions and Penalties Quick Guide

Moreover, the DAERA is responsible for the issuing of wildlife licences in Northern Ireland. Here, the Scottish experience is not relevant as the introduced Bill is dissimilar to the Scottish 2023 Act: it would not change the licensing regime in Northern Ireland, as was the case in Scotland.

Instead, Clause 11 of the introduced Bill seeks to amend the 1985 Order, to enable DAERA Wildlife Inspectors to enter a premises for the following purposes:

- Ascertaining whether a relevant offence is being or has been committed on the premise.
- Verifying any statement or representation made, or document or information supplied, by an occupier in connection with an application for, or the holding of, a licence or registration under the 1985 Order.
- Ascertaining whether any condition to which a licence under the 1985 Order has been complied with.[30]

Under the 1985 Order, the relevant offences are those that relate to:

- The unlicensed sale of live or dead wild birds or eggs
- The use of wild birds in competition
- The appropriate caging of birds
- The sale of live or dead wild animals
- The sale of wild plants
- The introduction or sale of non-native species of wild animal in Northern Ireland.[31]

The introduced Bill, if enacted in Northern Ireland, would amend the current list of relevant offences, extending its remit to include the DAERA Wildlife Inspectors' powers of entry to include offences relating to hunting with dogs, trail hunting and terrier work. Given the split in enforcement activity set out in the 2011 Act, it is not clear to what extent and in what circumstance the DAERA would use this new power. By extension, it is not clear the extent to which this

[30] The Wildlife (Northern Ireland) Order 1985 (s.25b)
[31] The Wildlife (Northern Ireland) Order 1985 (s.7, 8, 9, 13, 14(2), 15 and 15a)

new power would impact DAERA’s budget and how any incurred cost would be met. As noted earlier in this section, DAERA and the PSNI are yet to establish an agreed position on the “roles and responsibilities of PSNI and Wildlife inspectors” under the proposals. The form of the agreed position would likely have implications for the DAERA budget.

Potential Scrutiny Point:

5. What is the DAERA’s interpretation of Clause 11 of the Bill, will that Clause confer new functions on the Wildlife Inspectors and if so, what impact might this have on the Department’s resources?

4.3 DoJ potential public purse implications

The Bill, if enacted and implemented as introduced, would create new offences relating to hunting with dogs, trail hunting, and terrier work. The enforcement, prosecution and sentencing of those new offence would place new responsibilities on bodies within the remit of the DoJ including the below: incurring potential costs for each, as explored in this subsection:

- The PSNI
- The Northern Ireland Courts and Tribunals Service (NICTS)
- The Northern Ireland Prison Service (NIPS)

4.3.1 PSNI

The introduced Bill, if enacted as introduced, at Clause 11 seeks require the PSNI to enforce the new hunting offences. As explained above (in sub-section 4.2) the PSNI currently has responsibility for the enforcement of the 2011 Act in relation to wildlife. Specifically, the 2011 Act gave the PSNI the power to:

> *…deal with welfare offences involving wild animals and for more serious animal welfare offence such as animal fighting, or where other criminal activities are involved.*[32]

The PSNI also enforces the 1985 Order, as amended by the 2011 Act.

Since 2007, the PSNI has had a dedicated Wildlife Liaison Officer (WLO) who acts as the:

> *…central point of contact within the Police Service for police officers and police staff when advice, support and assistance is required in relation to all animal welfare or wildlife crime with particular links to a suspected breach in the legislation and/or any associated queries.*[33]

In practice the WLO assists officers in determining whether a breach of the legislation has occurred - importantly:

> *…the matter is therefore investigated at local level by an assigned investigating officer.*[34]

The Bill, if enacted and implemented as introduced, would expand the range of offences that the WLO would have to advise on, and investigating officers would have to investigate. Any financial implications arising from that change would depend upon the extent to which additional resources would be required to carry out those investigative and advisor functions.

RaISe contacted the PSNI to establish the organisation's general cost and staffing requirements arising from its duties under the 1985 Order and 2011 Act, as well as any additional cost and staffing requirements that might result from the Bill, if enacted. The PSNI responded to state that it did not "hold the type of costing or staffing data" sought and, as a result, was not in a position to provide an estimate of any additional resource requirements that could arise from the Bill.[35]

[32] Final report of the review of the implementation of the welfare of animals act NI 2011
[33] Animal and Wildlife Liaison Officer | PSNI
[34] Animal and Wildlife Liaison Officer | PSNI
[35] Email correspondence with the PSNI 7 May 2026

The PSNI also noted that “any costing would be absorbed under wider policing duties”. That is similar to the findings of the Financial Memorandum that accompanied the 2023 Scottish Act that the proposals would not change the way Police Scotland would “report, cases and respond to complaints by the public”.[36]

The PSNI also stated the Central Wildlife Team had a staff of two, one Staff Officer and one Assistant Staff Officer and PSNI officers are trained on wildlife crime. That training is for “frontline officers in Local Policing Teams and [the] District Support Team”. Over the period 2023 to 2026 approximately 1,172 officers have received this training. The Bill if enacted and implemented as introduced, could lead to additional training needs for PSNI officers in this area.[37]

Potential Scrutiny Points:

6. What additional resources would the PSNI’s Wildlife Team require to meet the requirements of the Bill, if enacted and implemented as introduced?
7. What additional PSNI training would be required as a result of the Bill, if enacted and implemented as introduced?

It is also worth noting that data on wildlife crime in Northern Ireland, as published in the “Review of the Implementation of the Welfare of Animals Act (Northern Ireland) 2011” (2016), shows the number of animal welfare and cruelty related reports represented a small proportion of the total number of incidents report to the PSNI. Those data are outlined in Table 6, below. As can be seen from the Table, animal welfare and cruelty related reports represented

[36] Email correspondence with the PSNI 7 May 2026
[37] Correspondence with the PSNI 13 August 2026

0/2% to 0.4% of total incidents reported to the PSNI between 2011 and 2015.[38],[39]

Table 6: Total number of incidents/reports reported to PSNI and breakdown of animal welfare/cruelty related reports[40]

Year	Total incidents reported to the PSNI	Animal welfare/cruelty related reports	% Animal welfare/cruelty related reports
2011	491,059	2,169	0.4%
2012	488,537	1,603	0.3%
2013	493,709	1,245	0.3%
2014	502,385	821	0.2%
2015*	323,784	853	0.3%

*January to August 2015

Source: DAERA (2016)

4.3.2 NICTS

The Northern Ireland Courts and Tribunals Service (NICTS) is an agency of the DoJ. It's role includes supporting an independent judiciary and the courts in Northern Ireland. It enforces civil course judgements, collects and enforces fines, and manages funds held in court on behalf minors and patients. It also has role in advising the Minster for Justice on operation of NICTS.[41]

38 Final report of the review of the implementation of the welfare of animals act NI 2011
39 RaISe contacted the PSNI requesting an update on these figures. The PSNI was unable to provide an update on the figures, noting that "Many offences under the relevant legislation are not included within the police recorded crime dataset due to their being summary offences (police recorded crime statistics only include offences which are indictable only, hybrid and a small number of closely associated summary offences)".
40 Final report of the review of the implementation of the welfare of animals act NI 2011
41 NICTS Business Plan 2025-26

As of the 2024-25 financial year, the NICTS had 900 members of staff, supported 74,000 criminal, civil and family cases, as well as 7,300 tribunal cases. In the same year, its total resource expenditure was £114 million.[42]

The Bill, if enacted and implemented as introduced, would create new offences relating to hunting wild mammals with dogs. The creation of those new offences could lead to an increase in the processing of individuals through Northern Ireland's court system, which in turn could place greater demand on the NICTS in its support and fine collection and enforcement roles.

The extent to which additional demand would be placed on the NICTS would depend on the number of increased prosecutions as a result of new proscribed offences. As outlined in sub-section 3.2.2, above, the experience in Scotland points to a modest increase in court proceedings resulting similar new offences after the enactment of the Scottish 2023 Act, albeit from a limited sample size. That sub-section noted that in 2024-24, 26 individuals were proceeded for hunting with dogs, representing 3.7-fold increase on previous trends.[43] That evidences the lower end of the Scottish Government's costs estimates, that is a three-fold increase in cases was expected to lead to a £15,904 total additional costs to the court services.[44]

4.3.3 NIPS

The new offences that would be created by the Bill, if enacted and implemented as introduced, could result in custodial sentences for those individuals found guilty. The proposed upper limits on custodial sentence set out in the Bill are imprisonment of 12 months summary conviction and five years on conviction on indictment.

If enacted, that could lead to an increase in the number of individuals imprisoned in Northern Ireland. Experience in Scotland shows that there were zero custodial sentences for wildlife crime in 2023-24, the year the Scottish

---

[42] NICTS Business Plan 2025-26
[43] Figures+-+Wildlife+Crime+in+Scotland+2024.xlsx
[44] Financial Memorandum

2023 Act was introduced. That is a very small sample size, so further data would be required to establish longer-term trends.

It is important to further note that although the data presented in Annex shows that there have been no custodial sentences under the Hunting Act 2004, that is due to the provisions of the Act itself, as the only penalty set out in 2004 Act is a "fine not exceeding level 5 on the standard scale".

A additional point of note is that the Scottish costings were based on the noted figures and an average cost of a year in prison in Scotland of £38,213 per year (based on 2020 data). By contrast, Northern Ireland Prison Service Annual Report and Accounts 2024-25 estimates that the cost per prisoner place in Northern Ireland was £57,180 in 2024/25[45] - that is a custodial sentence in Northern Ireland it is likely to cost more than in Scotland.

4.4 Potential income from fines

The introduced Bill's EFM stated:

> *….fines for non-compliance could help offset enforcement costs and support ongoing monitoring and compliance efforts.*[46]

Clause 5 of the Bill states that a person guilty of an offence upon summary conviction would be subject to imprisonment for a term of up to 12 months, or a fine of up to £20,000, or both; and a person found guilty of an offence on indictment would be subject to "imprisonment of up to five years, a fine, or both".

As set out in subsection 3.1 above, the offences created by 2004 Act in England and Wales carried the potential penalty of a level 5 fine. Annex 1 sets out the average fines and total fine income for each year since the 2004 Act came into effect. The average fine ranged from £231 in 2017, to £568 in 2022. Total fine

[45] Assembly Research and Information Service Briefing Paper - Criminal Justice (Sentencing etc) Bill: scrutinising key "public purse" implications
[46] Hunting with Dogs Bill EFM - As Introduced

income generation ranged from £1,900 in 2005, to £16,100 in 2012. Total fine income generated following the Act's introduction to 2025 was £176,700.

The England and Wales example, points towards relatively low income generation from fines; but importantly note that the offences and fine levels under the 2004 act are different to those proposed in the introduced Bill. Similarly, the demographics on Northern Ireland are different than that of England and Wales. For example, data from the Office of National Statistics shows the 17% of the population of England lived in a rural area in 2020; compared to 36% of the Northern Ireland population in 2022.[47] Given these noted differences, and the unknown level of prosecutions that may occur should the Bill be enacted and implemented as introduced, it is uncertain what level of fine income could be generated from the Bill.

Given fine income could arise from the Bill – albeit existing uncertainties as to how much those fines could generate – questions naturally arise about the potential future use of any such income. Here it is relevant to highlight that a department's ability to retain income generated from fees, charges and levies must be specified in primary legislation or secondary seeking to implement the primary legislation, **and** prior Department of Finance approval given before establishing such fee, charge or levy, pursuant to the prevailing institutional and financial arrangements under current devolution.[48] The introduced Bill specifies fines; and in line with current arrangements, those are to be paid into the Consolidated Fund of Northern Ireland (the Fund).[49] And any potential future fine income then is to be distributed through the Executive Budget process.

Another relevant point is that the Bill is silent on the potential future use of any such income. The Bill currently does not specify legislative authority for either the DAERA and or the DoJ to receive any such income, which, for example, in turn could be used to defray any costs that would be incurred when implementing the Bill, if enacted as introduced.

---

[47] Depopulation in rural areas - House of Commons Library
[48] See MPMNI Chapter 6
[49] Administration of Justice Act (Northern Ireland) 1954

This is different to for example, the carrier bag levy; where the DAERA receives the levy income, as specified in the Single Use Carrier Bags Charge Regulations (Northern Ireland) 2013, as amended, which implemented provisions specified in the Climate Change Act 2008, as amended. That income is retained by the Department and is later used for environmental projects, including the DAERA's specific Environmental Project Fund.[50]

Potential Scrutiny Point:

8. In relation to the introduced Bill's specified fines, their potential future income generation and potential future use of any such income, has the Bill Sponsor engaged with the following:

- DAERA?
- DoJ?
- DoF?

Please detail any such engagement, including what it entailed and any related outcomes.

5 Key takeaways

The Bill, if enacted as introduced, would create a statutory framework prohibiting specified hunting with dogs activity in Northern Ireland. It would establish offences relating to: hunting wild mammals with dogs, trail hunting and terrier work; set out exemptions; provide for PSNI and DAERA enforcement; and require DAERA to review the operation of the legislation every five years.

The Bill is considered within an ongoing challenging central and devolved public finance context, including significant pressures on the Executive's overall spending envelope and individual departmental budgets. The DAERA and the DoJ would be the principal departments involved in implementing the Bill,

[50] Carrier bag levy | nidirect

including in particular enforcement. The DoJ and the PSNI have identified existing significant budgetary pressures, while comparable detail from the DAERA was not available at the time of writing.

Available evidence indicates that the introduced Bill could create additional public purse costs for the DAERA, the PSNI, the Northern Ireland Courts and Tribunals Service and the Northern Ireland Prison Service, if enacted and implemented. The DAERA further advises an assessment of the Bill's financial implications has not yet been carried out, pending an agreed position on the respective roles of PSNI and Wildlife Inspectors. The PSNI has stated that it does not hold the relevant costing or staffing data and that any costs would be absorbed within wider policing duties.

The clearest comparative evidence comes from Scotland, where the financial assessment for similar legislation found no "meaningful" additional cost for the Scottish Government, largely because the proposed legislative changes were expected to require only relatively simple updates to guidance and procedures. Scotland's experience since the legislation was enacted bears that out, but also points to a possible, but modest, increase in court activity.

Moreover, additional annual costs in Scotland, excluding licensing were estimated at £28,216 to £126,972. Including licensing, the range increased to £57,716 to £244,972: making licensing the largest estimated cost pressure for Scotland under its similar legislation in this area. However, it is important to recognised that the introduced Bill does not include a Scottish-style licensing regime, meaning Scottish licensing costs are indicative rather than directly transferable to Northern Ireland.

Applying the Scottish experience to the Northern Ireland Bill present uncertainties because enforcement arrangements, prosecution levels and sentencing outcomes may differ. Nonetheless, potential implications would depend on the number of complaints, investigations, prosecutions and convictions arising under the new offences, that would be created by this Bill, if enacted and implemented as introduced, as well as any custodial sentences that would be imposed. Available evidence reveals prison costs in Northern Ireland would be higher than the Scottish comparator, given the available figures for 2024/25 – those were £57,180 per prisoner place for Northern Ireland compared to £38,213 per year in Scotland (based on 2020 data) .

Evidence from England and Wales reveals that fine income from hunting offences has been relatively low; however, the offences, penalties and rural population profile are different to Northern Ireland. In any event, fine income would be paid into the Consolidated Fund for Northern Ireland and the Bill does not provide a mechanism for the DAERA or the DoJ to directly use that income to offset implementation or enforcement costs.

Annex 1:

Number of individuals proceeded against, convicted and sentenced in England and Wales under 2004 Act (2004 to 2025)[51]

	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	Total
Proceeded against	**2**	**11**	**62**	**44**	**92**	**49**	**72**	**84**	**110**	**64**	**92**	**57**	**49**	**44**	**46**	**24**	**78**	**49**	**26**	**20**	**25**	**1,100**
Convicted	**2**	**5**	**48**	**33**	**59**	**36**	**56**	**48**	**56**	**35**	**45**	**31**	**22**	**21**	**17**	**16**	**43**	**21**	**14**	**14**	**18**	**640**
Conviction rate	100%	45%	77%	75%	64%	73%	78%	57%	51%	55%	49%	54%	45%	48%	37%	67%	55%	43%	54%	70%	72%	58%
Sentenced:	**2**	**5**	**48**	**33**	**59**	**36**	**56**	**48**	**56**	**35**	**45**	**31**	**22**	**21**	**17**	**16**	**43**	**21**	**14**	**14**	**18**	**640**
Absolute Discharge	-	-	-	1	2	-	4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	**7**
Conditional Discharge	-	-	6	7	4	2	6	2	9	-	5	1	-	1	1	-	-	2	-	-	-	**46**
Fine	2	5	41	25	53	33	45	46	47	35	39	26	22	20	16	16	43	19	14	14	17	**578**
Total Community Sentence	-	-	1	-	-	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	**2**
Suspended Sentence	-	-	-	-	-	-	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	**1**
Total Immediate Custody	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	**0**
Compensation (primary disposal)	-	-	-	-	-	-	-	-	-	-	1	4	-	-	-	-	-	-	-	-	-	**5**
Total Otherwise Dealt With	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	**1**

[51] Compiled using Ministry of Justice Criminal Justice Statistics quarterly: December 2025, December 2017, December 2016 and December 2015

Average fine (£)	-	380	283	278	279	135	278	351	224	312	239	298	231	380	283	436	359	568	375	454	460	-
Total fine income (£000s)	**-**	**1.90**	**11.6**	**7.0**	**14.9**	**4.5**	**12.5**	**16.1**	**10.1**	**10.9**	**9.3**	**7.7**	**5.1**	**7.9**	**4.5**	**7.0**	**15.4**	**10.8**	**5.2**	**6.4**	**7.8**	**176.7**

Source: Ministry of Justice (2026)