



NATIONAL ASSOCIATION
OF REGIONAL GAME COUNCILS

Ferbane Business & Technology Park, Ballycumber Road, Ferbane, Co Ofaly.

Tele: 090 654 3623;

Fax: 090 645 3697

Email: nargc@nargc.ie

19/11/2013

Mr Simon Coveney TD,
Minister for Agriculture Food and the Marine,
Agriculture House,
Kildare Street,
Dublin 2

Re: Animal Health & Welfare Act 2013 and Tail Docking

Dear Minister,

The National Association of Regional Game Councils (NARGC) was formed in 1968 and since then has grown to be the largest organisation on the island of Ireland involved in game hunting and conservation. It has 27,000 club members spread throughout 984 clubs – a club in almost every parish. It is also a Seanad Nominating Body. NARGC has been the lead organisation in the shaping of many of the legislative changes affecting hunting, shooting and wildlife over the past 20 years. It is the only hunting Association which has taken the Government and Government agencies to the courts to ensure proper compliance with wildlife, firearms and hunting policy and the legislative provisions pertaining. Among the many changes which the Association has been responsible for are the Firearms (Non Residents) Act, the firearms amendments in the Criminal Justice Act 2006, the inclusion of Section 36 in the Wildlife (Amendment) Act 2000 to regulate the activities of tourist shoot promoters and their clients, to mention but a few. In more recent times the NARGC, in conjunction with the Food Safety Authority of Ireland, has developed a course which is accredited by City & Guilds to meet the Trained Person requirements of Regulation (EC)853(2004). This regulation has significant consequences for deer hunters who place game meat into the food chain. Hunters who successfully pass the course are certified as

Trained Persons under the Regulation and may sign the statutory declaration when placing game meat into the food chain certifying that the meat has passed the field ante and post mortem inspection. This creates for the first time a traceability framework for meat harvested in the wild which is destined for the consumer foodchain. The Association maintains a fulltime office and staff at its headquarters in the Ferbane Business & Technology Park, Ferbane, Co Offaly. As can be deduced from the foregoing, we are a large, professional and responsible organisation.

NARGC represents the single largest group of dog owners in the country with all of our members keeping at least one working dog, but most keeping an average of three. It is important to emphasise that all our members' dogs are working breeds, Springer Spaniels, Labradors, Setters, Pointers, Retrievers and Terriers in the main. We therefore have a very distinct and earnest interest in the above captioned Act and the issue of the docking of dogs' tails and removal of dew claws to prevent unnecessary injury occurring to certain of the breeds which work in heavy cover. Docking of tails and dew claw removal within the first four days of birth is a very minor procedure which can be confidently carried out by any lay person with training and significantly, without the need for anaesthetic. This is in stark contrast to the painful, invasive and traumatic procedures which have to be carried out later in the dog's life when injury occurs. I can attest to this personally, being the owner of a Springer Spaniel which snagged its dew claw on barbed wire while hunting some years ago.

At present, we are aware that you are coming under severe pressure from Veterinary Ireland, the Dogs' Trust and a variety of anti-hunting organisations not to sign the Statutory Instrument which would give effect to regulations allowing a restricted exemption to the general ban on tail docking for certain working breeds. It is not insignificant that none of the organisations seeking a total ban on this issue have sought to meet with or hear the views of the largest owner group in the state – NARGC. But we have become used to this from such groups.

NARGC is very concerned that animal welfare in Ireland is at a high standard and the Association supports sensible measures designed to achieve that. This should not be confused with fundamentalist idealism and opportunistic politicking which simply debases the entire concept of animal welfare and achieves nothing. The Minister should be aware that NARGC members spend almost €6m annually on their dogs and their care (*Socio Economic impact of Hunting Activities in the Republic of Ireland, Dr David Scallan, NUI Galway*). Animal welfare costs money and hunting people who value their dogs very highly have never been found wanting in being responsive to their dogs' needs, irrespective of cost.

In the progress of the Animal Health & Welfare Act earlier this year, NARGC took the opportunity to support the new legislation and to take the lead on delivering improvements in animal welfare legislation. This was set against the background where:

- a. Literally **any** person, irrespective of age, could dock a dog's tail.
- b. Under the existing legislation such persons could dock the tail of **any** dog.
- c. Such docking could occur at **any** time in the dog's life.

Far from not seizing the opportunity to improve animal welfare legislation, as has been alleged by some groups, the NARGC, balancing the requirements of its own members with better welfare for dogs, has lobbied for and supported legislation which:

- Restricts those people who may carry out the procedure of tail docking and dew claw removal to trained persons.
- Restricts the breeds to which this applies to only three of the working breeds (Spaniels, Pointers and Terriers) and,
- Restricts the procedure to taking place within four days of birth.

To ignore or fail to acknowledge these very significant improvements is simply to encourage hunting people to ask the question *“Why bother supporting legislation at all or making any effort if the improvements we support are to be effectively belittled?”* There were of course others who held a “no surrender” attitude to any concessions, but as a responsible organisation, it is our job to be persuasive and bring these people with us and we have done that. In essence, the practice of tail docking now moves from being unregulated into a regulated legislative structure and this is supported by hunting groups. For anyone to suggest that this is not a major improvement is to ignore the facts.

It should also be noted that both Northern Ireland and the UK have already adopted exemptions from a total ban for similar working breeds.

The vets’ professional body, which is campaigning hard for a total ban on docking, is threatening severe sanctions on vets who carry out the procedure, which inevitably would threaten their livelihoods. On the one hand, Veterinary Ireland refuses to allow vets to provide the service and on the other they object to trained non vets doing it. In other words, they want it both ways. But if there is a total ban, the outcome will be as follows:

- d. Tail docking will undoubtedly continue and will be carried out for ROI owners in another jurisdiction, Northern Ireland.
- e. Alternatively, and most probably, it will be driven completely underground where no standards will apply,
- f. There will be no possibility of enforcement,
- g. There will be no legal structure to govern training, the age limits for docking or the breeds affected,
- h. A large group (NARGC) which is supportive of animal welfare and which also represents the largest group of dog owners in the country i.e. hunting people, will be unnecessarily alienated with likely negative consequences for co-operation when it comes to compulsory micro-chipping.
- i. A total ban will in fact achieve the very opposite to what is intended and will leave matters much worse than the present situation. This will be a very bad outcome for animal welfare.

It is also worth noting that:

- We have been informed by some vets within our ranks that Veterinary Ireland did not consult with its vet members prior to making the decision to sanction them for carrying out these procedures.
- Not all vets agree with Veterinary Ireland's stance on this issue. But that is the nature of opinion in a democracy.
- Veterinary Ireland, the Dogs' Trust and other anti-hunting organisations seem to believe they have a monopoly on being right on this and every other animal issue while ignoring the biggest dog owner group in the country.
- We do not expect universal agreement but at least let us agree on the actual facts of what is the current situation and how that situation will be changed under the new legislation and on the consequences of a total ban

We urge you to sign the intended Statutory Instrument giving effect to allowing restricted tail-docking in accordance with the proposed training, restricted breeds and restricted age requirements as a sensible compromise which represents a major animal welfare step forward from the current situation and which is workable.

Should you or your officials have any queries or matters you wish to discuss with us, we are available to assist you in any way we can.

Yours sincerely,

Desmond Crofton,
National Director.