

## **Summary of Submissions of the Consultation on the Animal Welfare Strategy 2018**

In September, 2018, DAFM circulated a consultation document on the New Animal Welfare Strategy and sought responses from the public and stakeholders. DAFM welcomed 24 submissions from organisations and individuals which covered a variety of inputs, ranging from technical observations about welfare measurement issues to very specific policy recommendations. DAFM would like to express its gratitude to every individual and organisation who took time to contribute their time and expertise.

On the issue of the strategic approach and the level of ambition, there was a broad welcome for the position taken on the consultation document. A number of submissions stressed that our strategic ambitions should see Ireland as a world leader and at the forefront best practice in animal welfare.

Generally the OIE definition was seen as a good baseline to work with some respondents urging an ambitious strategic approach that goes beyond that the OIE animal welfare standards. In this context the need for international benchmarking was raised by a number of respondents.

Some respondents stressed that in addition to animal owners and keepers bearing responsibility for animal welfare that the Government has a responsibility to ensure that animal welfare is protected. Further submissions suggested that stronger penalties could bring about a change behaviour. Respondents also advised that education could change culture around animals, underpinned by developing education and awareness early.

In relation to minimum acceptable standards, respondents advised that the term should not equated to the acceptance of low standards. This was in keeping with the ambitions of the proposed new Strategy in terms of going beyond what is legally mandated.

The Life Worth Living concept was widely welcomed by respondents with submissions advising that the Strategy should be mindful of implementing the concept with regards to intensive systems of farming, especially for pigs and poultry.

In relation to stakeholder engagement there were suggestions received that the Strategy should incorporate as wide a diverse a stakeholder grouping as possible including the participation of small welfare groups in recognition of their important frontline work. Some respondents suggested the formation of a Non-Farm FAWAC equivalent for companion animals and equine incorporating input from experts in these areas.

Regarding the implementation of the Strategy, respondents stressed the importance of including targets as a measurement of effectiveness. To the end respondents also identified the need for both objective and subjective measurements. A further suggestion was the establishment of an executive body to provide oversight, set objectives and measure compliance.

On Enforcement, while the concept Codes of Practice was generally welcomed, some respondents expressed a preference for legislation or some form of compulsion or penalty with some submissions calling for more detail in the legislation. Some respondents called for mandatory bans for all welfare offences (it will be recalled that a number of individuals had been banned from keeping animals

under the Animal Health and Welfare Act, 2013. Integration with the gardai pulse system was also suggested. There were also requests to increase the number of Authorised Officers and expansion of the status of these Officers to NGO's and small rescue organisations.

Respondents suggested better enforcement in relation to equine ID and access to land register details so that land owners can bare more responsibility for horses abandoned on their land. There were suggestions received in relation to the regulation of pet shops and online sales of animals with a ban on the sale of primates also suggested. Clarity on single point of contact to report issues was also sought with one respondent suggesting a single Government Department to deal with all welfare issues.

The Education element of the proposed Strategy received wide support from respondents. There were suggestions that animal welfare should be on the school curriculum with a further suggestion that the judiciary and legal professions should receive training. There were further suggestions in relation to training DFAM employees and the Gardai. Respondents also advised on the need for training for those running animal sanctuaries and that training should be mandatory for all individuals who profit from animals. Further suggestions involved an education campaign on selective breeding and educational consolidation with the Control of Horses Act.

DAFM received a variety of recommendations and suggestions in relation to the Research element of the Strategy. One respondent suggested a focus on behavioural outcomes in puppy farms linked to dog biting and sheep worrying. There was a suggestion for a study in birth control versus euthanasia for horses and stallion licensing. A research study in relation to criminologists on the link with crime and early childhood was put forward. One respondent requested research into the indicators of welfare in relation to complex interaction behaviour, psychological and cognitive. Research on feral cats in order to get a clearer picture on the scope of the problem was also suggested in order to regulate breeding. A dog population study was also recommended. A further suggestion was a study on Welfare of animal in other countries in order to measure Equivalent standards. One respondent recommended a high welfare food labelling scheme.

A number of respondents outlined specific actions in relation to the banning of fur farming and coursing with further suggestions in relation to hunting. There was a request to ratify the European Convention for the Protection of Pet Animals. A white list for the exporting of greyhounds was also recommended.

There were a number of recommendations by respondents relating to companion animals and the regulation of puppy farms. A ban on shock collars was recommended as was a review and extension of the current tail docking prohibitions. A ban on euthanasia in pounds was requested as was the standardisation of all Local Authority pounds. There was a further suggestion of a restriction on breeding of dangerous breeds.

While this summary of responses received attempts to cover many of the main elements of the advice, recommendations and suggestions gratefully received by DAFM as part of the consultation process it has not been possible to include all of the input received into this section. However, respondents are advised that all the elements of these submissions were carefully scrutinised considered and have formed an important role into the development of the Strategy.