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Dog Control Unit
Department of Rural and Community Development
Government Offices, Castle Rd
Abbeyhalfquarter
Ballina, Co. Mayo, F26 E8N6

6th September 2019

Re: Public Consultation on a review of measures relating to the control of dogs in Ireland

Dear Sir/Madam

Mountaineering Ireland welcomes the current public consultation on a review of measures relating to the control of dogs in Ireland, and the Department's interest in having an approach in place for the effective control of dogs in Ireland. The consultation paper seems not to take cognisance of some aspects of dog control, for example in relation to dog fouling, sheep worrying and disturbance of wildlife. In the context of outdoor recreation activities, the control of dogs, on both public and privately-owned land is of growing concern.

This review presents a once-in-a-decade opportunity to ensure we have effective legislative measures in place related to the control of dogs in Ireland; it is important that all relevant issues are addressed.

Mountaineering Ireland is the representative body for hillwalking and climbing on the island of Ireland and as such is recognised as the governing body for the full spectrum of mountaineering activities by both Sport Ireland and Sport Northern Ireland. Mountaineering Ireland has a total of 13,180 members made up of 186 clubs and 1,520 individual members (as at 31st October 2018).

Mountaineering Ireland contributed to, and endorses, the consultation response submitted by the Dublin Mountains Partnership (DMP).

In this submission we outline additional points, focused mainly on dog control in the context of walking and climbing activity on privately-owned land in upland areas. This submission should be read in conjunction with the DMP response. The bulk of the submission response probably fits best under **Consultation Question 4: *Are there other initiatives that should be taken in this area?*** Responses to other questions are identified separately.

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Current situation

Mountaineering Ireland's position in relation to dog control is that dogs in the countryside should be kept on a lead, and that dogs should only be taken onto hill land with the landowner's permission to do so.

This position is influenced by our desire to maintain the goodwill of landowners who we depend upon for access for our activities (whilst there is a tradition of private landowners allowing access for recreational activity, there is no legal right of access to land in Ireland). It is also protect wildlife and to help maintain a healthy upland environment.

Despite signage in various places and regular messaging by Mountaineering Ireland and others, a minority of people continue to take dogs onto hills and other rough grazing land, and in some cases clearly do not have their dogs under effective control. This causes concerns for landowners, especially where livestock are present, it discourages landowners from allowing people onto their land and presents a threat to continued access.

Signage and other messages to prevent people taking dogs on hill land are not working, with the exception perhaps of the MacGillycuddy Reeks where there has been a concerted effort involving large signs, media activity and at certain times people on the ground speaking with visitors. Poor behaviour by a minority is restricting the freedom of responsible people and causing inconvenience, and in certain cases, loss for farmers.

The extent to which uncontrolled dogs are responsible for the disturbance of wildlife is largely unknown, however at the Bull Island in Dublin the fact that hares are no longer breeding has been found to be related to the presence of dogs, and each summer BirdWatch Ireland actively manages a number of sites to prevent predation of tern nests by dogs.

Numbers participating in walking and other outdoor recreation activities in Ireland are increasing. The majority of people engaged in these activities are not part of a club or any organised body. Communicating with such a fragmented audience is difficult.

How this review could improve the situation (mainly in response to Question 4)

It is Mountaineering Ireland's position that this consultation presents an opportunity to focus on developing a **culture of responsible dog ownership in Ireland, supported by appropriate legislation.**

Mountaineering Ireland supports the DMP's call to **consolidate, or at least connect, all relevant legislation**, so as to make implementation easier and more effective.

As proposed in the DMP submission, legislation should be enabling and should allow for the appointment of **authorised officers** to allow public land managers (e.g. Gardaí, NPWS, Coillte, local authorities) to more effectively address poor dog control.

The dog licence database and the registration of micro-chips should be combined. Authorised officers should be issued with small **hand-held chip-readers** so they can check if a dog is licensed and micro-chipped, and if it



is isn't, or if the dog is not under effective control, they should be empowered to issue **on-the-spot fines**. Failure to keep one's dog under effective control should have **consequences**; currently the only consequence would appear to be greater restriction on the freedom of responsible dog owners.

Increased purchase of **dog licences** has the potential to generate revenue to assist in efforts to achieve more effective dog control.

There is an overarching need to build acceptance that **owning a dog is a responsibility**. Building awareness and understanding of the **potential impacts** of dogs on people, farm animals, wildlife, is part of this.

In relation to the **worrying of livestock** by dogs, the legislation should make clear what constitutes 'worrying'; this in turn then needs to be communicated to the public. It should be noted that farmers involved with the Wicklow Uplands Council have acknowledged that sheep worrying is more often due to local dogs, rather than those brought by recreational visitors to the Wicklow uplands.

Clear information is also required on the dangers of **dog foul** and good practice advice as to how best to manage and dispose of this.

The designation of **dog-friendly areas** on both public and privately-owned land should be encouraged. The desire for people to have places to go with their dogs is evident from the number of blogs and social media pages sharing information on this topic. It is also an issue for visitors travelling from Britain with their dogs who are accustomed to a legislative framework that is more welcoming of dogs in the outdoors. The designation of dog-friendly areas can also **assist habitat and species conservation** by concentrating dog activity in less sensitive locations.

It may be best to approach the objective of achieving the effective control of dogs in Ireland from a position of recognising **the many physical and mental health benefits associated with dog ownership**.

The use of **positive language** will help achieve greater public engagement. Most people taking their dogs into the outdoors love their dogs and may not engage with signage or other communications that present dogs as a problem.

It is Mountaineering Ireland's position that this requires a **national awareness campaign**, across conventional and social media channels, developed with input from a multi-stakeholder working group (similar to what the Dublin Mountains Partnership assembled, including expertise on dog behaviour).

Mountaineering Ireland is a member of **Comhairle na Tuaithe**, the national advisory body on outdoor recreation, which also comes under the Department of Rural & Community Development. The membership of Comhairle includes the main farm representative bodies as well as tourism and recreation interests. Comhairle could provide a useful sounding board for further discussion on this aspect of your review.

Finally, a programme of **research into matters related to dog control** should be instigated. There are many topics where knowledge is required, e.g. in relation to the risks associated with dog foul, disturbance of wildlife by dogs, the benefits of dog ownership etc. This information should guide the development of initiatives to encourage positive and responsible behaviour, and ultimately effective dog control.

Question 3: Should neutering be (a) encouraged more or (b) required

Neutering should definitely be encouraged, so as to reduce the proliferation of new dogs. Consideration should also be given as to whether a licence should be required for dog breeding.

Question 5: Should the requirement that all dogs be kept under 'effectual control' be made more specific? If so, what should this be changed to?

Mountaineering Ireland believes that for legislation to enable effective control of dogs in Ireland it is necessary to clarify what is 'effectual control'. In our view this is keeping a dog on a lead, or a dog returning to heel immediately on command.

A centralised register for micro-chipping affords the opportunity to introduce a requirement for all dog owners to undergo training with their dog which would include a demonstration of effective control. This could then be recorded on the dog's micro-chip (and checked by authorised officers with chip-readers as described above).

Mountaineering Ireland trusts that you will take our views into account in your further work on this important and timely review. Should you have any questions arising from our submission, please do hesitate to get in touch.

Yours sincerely

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