

STATES OF JERSEY



DRAFT DOGS LAW (JERSEY) AMENDMENT REGULATIONS 202- (P.63/2025):COMMENTS

**Presented to the States on 21st November 2025
by the Environment, Housing and Infrastructure Scrutiny Panel**

STATES GREFFE

COMMENTS

The Environment, Housing and Infrastructure Scrutiny Panel (hereafter the ‘Panel’) previously lodged Comments on 29th September 2025 ([P.63/2025.Com](#)) and 7th October 2025 ([P.63/2025.Com.\(2\)](#)) regarding the *Draft Dogs Law (Jersey) Amendment Regulations 202-* ([P.63/2025](#)) (the ‘Proposition’). In those Comments, the Panel recommended that the Comité des Connétables (the ‘Comité’) provide a clear justification for its chosen policy direction on dangerous dogs and set out the extent and nature of consultation undertaken with relevant enforcement and welfare bodies prior, or during, the debate on the Proposition.

During the debate on 12th November 2025 (the ‘Debate’), the principles of the Proposition were adopted; however, the Panel subsequently called in the Proposition for review, as the concerns identified in its Comments remained unaddressed by the Comité.

Following this, the Panel requested written submissions from the Jersey Society for the Prevention of Cruelty to Animals (the ‘JSPCA’), the States of Jersey Police (the ‘Police’), and the States Veterinary Officer to clarify the issues that remained unaddressed, as well as further concerns raised by States Members during the Debate.

Specifically, the Panel asked the JSPCA whether the concerns raised in its written submission dated 6th November 2025 had been addressed; the Police about consultation, enforcement capacity, and current practice; and the States Veterinary Officer what alternative, non–breed-specific approaches were considered during the development of the Proposition and their relative merits.

The written submissions received were highly informative, and the Panel wishes to thank each organisation for its cooperation. The Panel has organised the key information arising from this evidence into thematic sections, as set out below.

Policy Rationale

The States Veterinary Officer provided clarification on the rationale for a breed-specific approach. While it was acknowledged that a behavioural/owner-based model would address root causes of risk, it would require significant resource and a different regulatory structure: concluding that the proposed breed-specific measures were a pragmatic compromise, albeit not a definitive solution.

The States Veterinary Officer also noted that the UK XL-Bully is not a recognised breed, but a type of dog with substantial variation and no definitive breed standards, which poses definitional and enforcement challenges.

Consultation Failures

Both the JSPCA and the Police confirmed to the Panel that they were not consulted in the development of the proposed amendments relating to dangerous dogs, despite the Police holding statutory enforcement responsibilities and the JSPCA having a central operational role in stray dog management and kennelling.

The Police explicitly stated that they only became aware of the Proposition “by chance” in an unrelated meeting with the JSPCA, and that no formal engagement occurred prior

to the Proposition being lodged. The JSPCA has similarly stated that no formal consultation occurred.

This directly contradicted assurances given during the Public Hearing held with the Comité on 24th October 2025 (the ‘First Public Hearing’) that the Police had been consulted and were supportive. It has now been made clear that engagement was limited, reactive, and did not constitute formal policy consultation: falling substantially short of what is expected when legislation imposes new enforcement powers or operational duties.

Enforcement and Operational Capacity

The Panel was also provided with unequivocal confirmation from both the Police and the JSPCA that Jersey currently has no facilities, no trained personnel, no kennelling capacity and no operational infrastructure to seize, hold or assess dangerous or dangerously out of control dogs.

The Police have further confirmed that they recently had to fly a specialist UK officer into the Island to seize a dog that was dangerously out of control at public expense, due to the absence of any local capability. The JSPCA has clarified that its quarantine facilities are not suitable for seized dangerous dogs and cannot be used for medium or long-term holding in high-risk cases.

Under the current Dogs (Jersey) Law 1961, the Police are already responsible for seizing dogs that are dangerously out of control. However, the Proposition amends Article 11 to extend this duty further by requiring Police Officers to seize dangerous dogs as well. Given the absence of trained personnel or facilities, there is significant concern that these powers cannot be exercised in practice.

Definitions & Scope of the Proposition

The Police also raised concerns that the Proposition does not clarify whether Honorary Police Officers fall within the definition of “Police Officer”. The JSPCA further noted that most child fatalities involving dogs occur in private homes, where the legislation would have no effect.

Public Hearing Findings

Given the information gathered, the Panel deemed it appropriate to schedule a further Public Hearing with the Comité and States Veterinary Office, which was held on 20th November 2025 (the ‘Second Public Hearing’). The Panel’s questioning focused on the concerns raised both during the Debate and the written submissions received from stakeholders.

During the Second Public Hearing, the Panel learnt that the Comité had held a “roundtable” meeting with the JSPCA and Police following the Debate and the Panel referring the legislation for further scrutiny. As a result, the Comité explained that the Police were intending to formalise arrangements with a UK police force to provide specialist support for seizing dangerous or dangerously out-of-control dogs, and that discussions had begun with a private on-Island provider regarding kennelling facilities to hold seized dogs.

The Comité addressed concerns regarding the procedure for unwanted, abandoned or unclaimed dangerous dogs, noting that rehoming would first be explored with close relatives or persons known to the owner, but that beyond this, no further operational options are currently possible other than reliance on existing kennelling arrangements.

The Comité also concurred with the JSPCA's concern that the Proposition would have no effect on reducing attacks or potential attacks that occur within the home.

Finally, accepting the Panel's concern as to the lack of legislation on the matter, the Comité also advised that it proposed to introduce legislation relating to businesses providing dog-walking services within the period of the current Assembly.

Conclusion

The Panel's examination of the Proposition has highlighted significant shortcomings in the consultation and policy-development process undertaken by the Comité. The absence of early, formal engagement with principal organisations affected by the Proposition has resulted in a scrutiny process that was both unsatisfactory and unnecessarily convoluted.

The Panel is satisfied that the substantive issues raised by States Members during the Debate, and by stakeholders in their written submissions, were addressed to a reasonable degree during the Second Public Hearing on 20th November 2025. The Comité provided clarification on the policy intent, the limitations of breed-specific controls, and the practical handling of unwanted or unclaimed dangerous dogs. These explanations have resolved several of the uncertainties that prompted the Panel referring the legislation for further scrutiny.

However, the Panel remains firmly of the view that, in its current state, the amended Law cannot be enforced from the date of commencement. Jersey presently has no trained personnel, no kennelling capacity and no operational mechanism to seize, detain or assess dangerous dogs. The Panel notes the Comité's confirmation that arrangements are being pursued with a UK police force for specialist assistance, and that discussions with a private provider regarding kennelling facilities have begun. While these steps are welcome, they remain preliminary, have not been costed, and currently lack the formal structure required to underpin an enforceable statutory regime.

Therefore, the Panel considers the practical effectiveness of the Proposition to be entirely dependent on the Comité securing:

- a formal Memorandum of Understanding between the States of Jersey Police and appropriate UK police force to provide specialist seizure capability; and
- contracted kennelling facilities suitable for holding seized dogs.

The Panel urges the Comité to put these arrangements in place as a matter of priority so that the legislation can be implemented as intended.

Although the Proposition identifies financial and staffing implications relating to the States Veterinary Officer's administrative duties and Parish licence-system upgrades, it does not account for the substantial operational costs now known to be necessary for enforcement. In the Panel's view, the financial and staffing implications set out in the Proposition no longer reflect the realities of implementing the amended Law.

Finally, the Panel's scrutiny of the Proposition since its lodging on 19th August 2025 has highlighted that the current legislative framework governing dogs and wider animal-related matters is fragmented and lacks cohesion. The Panel will therefore be undertaking a wider review, as part of its scrutiny of the forthcoming *Draft Animal Welfare (Jersey) Law 202–*, to examine dog-related provisions across all relevant legislation, including but not limited to the *Dogs (Jersey) Law 1961* and the *Policing of Beaches (Jersey) Regulations 1959* and the *Policing of Parks (Jersey) Regulations 2005*.