

JSPCA Response: Draft Dogs Law (Jersey) Amendment Regulations 202 - (P.63/2025 & P.63/2025.Amd)

Thank you for inviting the JSPCA to provide further clarification following the States Assembly debate on the proposed amendments to the Dog (Jersey) Law, and for ensuring that our concerns were brought into the Chamber. We welcomed the acknowledgement from Members that behaviour and ownership are central to reducing risk, and we recognise that the resource requirements of such a framework contributed to a desire to have “something” in place urgently should the worst happen.

Despite this, our fundamental concerns remain, and the debate did not resolve or clarify several key issues that are critical to effective public and animal safety.

Clarifications

Engagement and Consultation

During the debate, several references suggested that the JSPCA had been consulted or directly involved in developing this legislation. To clarify our position, the JSPCA was not formally consulted at any stage. The only interactions on this topic were informal, off-the-record conversations which did not constitute consultation, and therefore generated no official documentation. To date, we have not had any meeting with the Connétable on this subject.

Provisions for seizing dogs:

The JSPCA’s stray dog contract covers the collection and housing of stray dogs for up to seven days and has no relevance to the housing or management of seized dogs under existing or proposed legislation.

To note, the JSPCA also have a contract in place with the States Vet department for quarantine facilities. These facilities are suitable for the short-term housing of dogs, and would not be a viable potentially long-term solution for housing any dog including XL bully-types.

While Article 11 allows for the seizure of dogs dangerously out of control, our understanding is that there are currently no on-island facilities or resources to carry out such seizures. This represents a significant gap in provision and presents a clear risk, leaving a critical public-safety function effectively unusable.

Breeding and Risk Across Breeds

Reference was made to the breeding purpose of XL-type dogs as justification for the proposed restrictions. However, several other breeds commonly bred for guarding, herding or security work — including German Shepherds, Malinois and Rottweilers — are also capable of inflicting life-changing injuries or fatalities, particularly to children, yet these breeds are not included. Risk cannot reasonably be restricted to such a limited breed-type.

Concerns

Effectiveness

Our core concern - that breed-specific legislation is ineffective in preventing serious incidents – remains unaddressed.

Our original submission referenced extensive evidence from multiple jurisdictions evidencing its ineffectiveness and subsequent retraction in many countries. As highlighted in the debate, the UK's dangerous dog act continues to be widely regarded as ineffective and problematic; serious dog attacks have increased across the UK despite the introduction of breed-specific restrictions.

Many fatal incidents occur indoors and involve exempted or registered dogs. The death of the 9-month-old baby in Wales, repeatedly cited in the debate, occurred inside the home and involved an exempted dog and would not have been prevented by this legislation. This case alone demonstrates that legislation of this type cannot prevent the very incidents motivating its introduction.

Behaviour and Welfare

Risk is directly linked to ownership and unmet needs. While some members stated that “most dog owners are fully responsible”, we must emphasise that this is unfortunately not reflected in what we see daily. Jersey continues to see high numbers of dogs with poor socialisation, reactivity and behavioural issues.

Restricting dogs based on appearance and breed-type is likely to reduce exercise, limit socialisation, and increase stress, unmet needs and reactivity. These factors elevate risk within households and may also contribute to stigma or mistreatment of dogs perceived to fit the XL conformation.

These welfare concerns were not meaningfully addressed in the legislation or the debate.

Risk to Children

The claim that “all children will be positively impacted” is not supported by evidence. Most child fatalities occur in the home, where this legislation has no effect. Many other breeds are capable of inflicting fatal injuries and a welfare-compromised, restricted dog may increase risk to children inside the home.

Definitions and Practicality

The measurements and descriptors underpinning the legislation do not reliably align with risk and are unlikely to prevent the continued presence or breeding of other large, powerful dogs on the island. The legislation risks creating an impression of action without addressing the underlying causes of dog-related harm.

Enforcement and Resourcing

We remain concerned about enforcement and resourcing. There are currently no facilities or capacity for seizure, no clarity around assessment or handling, and no funding identified for these functions. References to an unnamed “local trainer” raises further concern, as canine behaviour and training is an unregulated industry, and without knowing the individual’s qualifications, accreditation or methodology, it is impossible to be assured of welfare-centred or evidence-based practice.

We are concerned that the likelihood of non-compliance continues to be underestimated. The JSPCA has already been contacted by XL-type dog owners seeking financial assistance for neutering, and there has been no uptake in our muzzle-training offer. These early indicators suggest compliance cannot be assumed and that real-world barriers exist that were not acknowledged in the debate.

We believe a behavioural and ownership-based framework remains the more effective, evidence-led and enforceable option. While the debate acknowledged that such a framework has resource requirements, the same is true of the proposed legislation, which mirrors many of the limitations experienced in other jurisdictions.

Questions for Clarification

We would welcome clarification on the following:

1. Which behavioural or ownership-based frameworks were considered before the current proposal was put forward.
2. The estimated resource and cost requirements of those alternatives, compared with the resources required to enforce the proposed legislation.
3. Whether any current XL-type dogs known to the States Veterinary team display behaviour that would be considered a risk to the public.
4. Statistics or evidence of fatal attacks involving XL-type dogs in the home compared to public attacks, given the legislation only applies outside the home.
5. The qualifications and experience of the trainer or handler referenced in the debate.
6. How owners unable to afford neutering will be supported to comply.
7. What facilities, personnel and resources are currently available to support seizure, assessment and enforcement.

Conclusion

This legislation risks creating a false sense of security by focusing on appearance rather than behaviour and by overlooking the environments in which the most serious incidents occur. There is a significant risk that adopting this limited measure will delay progress toward a more effective, evidence-based and welfare-focused framework that would provide meaningful public protection. The JSPCA remains committed to supporting the development of such an approach.