



JSPCA Submission: Scrutiny of Proposed Amendments to the Dogs (Jersey) Law 1961

Executive Summary

The Jersey Society for the Prevention of Cruelty to Animals (JSPCA) welcomes the opportunity to contribute to the Scrutiny Panel's review of the proposed amendments to the Dogs (Jersey) Law 1961. While we fully support measures designed to promote public safety and responsible dog ownership, we have serious concerns about the inclusion of breed-specific restrictions - particularly in relation to XL Bully dogs - and the lack of consultation with key stakeholders.

Public and political responses to serious dog bite incidents are often driven by fear and emotion. These cases can attract intense media attention and calls for immediate action. Under such pressure, governments in other jurisdictions have turned to breed-specific legislation (BSL) as a quick, visible response, providing the community with a false sense of security while failing to address the underlying causes of aggression. Whilst we do not have robust data for Jersey dog attacks, evidence from other jurisdictions indicates that the majority of dog bites occur within the home or on private property, demonstrating that the real solution lies in prevention, education, and responsible ownership rather than breed bans.

As an animal welfare organisation, we believe that any amendments must be evidence-based, welfare-led, and practically enforceable. We therefore urge the Government of Jersey and the Scrutiny Panel to pause implementation of breed-specific measures until a full consultation with relevant agencies, including the JSPCA and the States of Jersey Police, has been undertaken.

1. Lack of Consultation

The JSPCA notes with concern that we were not consulted during the drafting of these proposed amendments. Given our extensive experience in handling, rehabilitating, and assessing dogs, our exclusion represents a missed opportunity to inform evidence-based policymaking. We understand that the States of Jersey Police were also not formally consulted. Their operational insight, alongside ours, would have been invaluable in assessing the enforceability and welfare implications of the proposals.

2. Current Practical Challenges

There are currently no trained or licensed dog handlers within the JSPCA or the States of Jersey Police who are able to deal with dangerous dogs. Likewise, neither organisation has suitable facilities to house or safely care for such animals. While we are working collaboratively with the States Veterinary Officer and the Police to establish a Memorandum of Understanding (MoU) and clear protocols to address this, no viable on-island solution exists at present. Any legislative changes that enable seizure or long-term kennelling of “dangerous” dogs must therefore account for these practical realities. Without appropriate facilities, enforcement could pose safety, welfare, and resource challenges for all parties involved.

3. Dangerous Dogs: A Behavioural Approach

The JSPCA recognises and shares public concern about dangerous dogs and the need to protect people and animals from harm. We are already strengthening internal protocols to protect staff and the public and support a coordinated island-wide approach.

Our experience shows that genuinely dangerous dogs can arise across a wide variety of breeds. The key determinant of aggression is not genetics alone, but a complex combination of environment, socialisation, handling, and owner responsibility. A comprehensive study of dog bite-related fatalities found that most incidents were characterised by coincident, preventable factors; breed was not one of these.ⁱ An effective policy must therefore target behaviour rather than breed - focusing on prevention, education, and enforcement against irresponsible ownership.

4. Concerns Regarding Breed-Specific Legislation (BSL)

The JSPCA does not support breed-specific legislation. Evidence from the UK and internationally demonstrates that BSL has not reduced the incidence of dog bites or improved public safety. In some cases, bite incidents have even increased following its introduction. In the UK, hospital admissions for dog bites rose by 154% between 1999 and 2019 — even with some breeds already banned.ⁱⁱ

Breed-based restrictions are discriminatory, difficult to enforce consistently, and ineffective at improving public safety. They risk stigmatising responsible owners and non-aggressive dogs while failing to address the root causes of dangerous behaviour. Dogs should be assessed on individual behaviour and temperament, not physical appearance or measurements.

Our position on breed-specific legislation aligns with that of leading UK animal welfare and veterinary organisations, including the RSPCA, Dogs Trust, Blue Cross, Battersea Dogs & Cats Home, the British Veterinary Association, and The Kennel Club.

5. Evidence from Other Jurisdictions

Our stance is supported by comprehensive evidence and expert opinion from multiple countries where BSL has been introduced. These studies consistently demonstrate that breed-specific approaches do not improve public safety and can, in some instances, worsen animal welfare outcomes.

Importantly, several countries that initially implemented BSL have since repealed or amended such laws after reviewing the evidence and concluding that they were ineffective in reducing dog bite incidents or improving public safety.ⁱⁱⁱ This trend reinforces the growing international consensus that breed-specific controls are not the solution and that a behaviour-based approach is both more effective and ethical.

We respectfully encourage the Panel to review the following key reports, which clearly articulate the same evidence-based position that the JSPCA holds:

- **Australian Veterinary Association (AVA) – *Dangerous Dogs: A Sensible Solution (2012)***:^{iv} Demonstrates the ineffectiveness of BSL and outlines behaviour-based alternatives that combine responsible ownership, registration, education, and accurate data reporting.

- **RSPCA (UK) – A Dog’s Dinner: Breed-Specific Legislation:**^v Reviews data from the UK’s Dangerous Dogs Act, concluding that BSL has failed to reduce dog bites or enhance safety, while causing unnecessary euthanasia and enforcement difficulties.
- **RSPCA (UK) – Written Evidence to the UK Parliament on the Dangerous Dogs Act:**^{vi} Highlights the lack of scientific justification for BSL, issues with breed identification, and the benefits of behaviour-focused approaches.

These reports, alongside the JSPCA’s own operational experience, form a strong and consistent evidence base supporting a shift towards a proportionate, behaviour-led framework for Jersey.

6. The XL Bully Proposal

We are particularly concerned about the proposal to include XL Bully dogs under breed-specific restrictions. In the UK, there have been cases where litters of puppies born from breeds determined as ‘type’ have been split, with some dogs deemed to meet “type” measurements and euthanised, while others from the same litter were exempt.^{vii viii}

Determining risk based on physical characteristics rather than behaviour is unfair, risks inconsistent application, and does not reflect how a dog’s temperament develops or presents in practice.

To date, there have been no fatalities or serious attacks involving XL Bully dogs in Jersey. The JSPCA has extensive experience managing dogs that have exhibited genuinely dangerous behaviours and, at times, posed a risk to life. However, none of these cases have involved XL Bullies. While we acknowledge that any large, powerful dog has the potential to cause harm, this risk is not unique to the XL Bully breed type. We believe that targeting this breed specifically is discriminatory, ineffective, and does not address the genuine issue of dangerous dogs on the island.

7. Animal Welfare and Ethical Implications

The welfare implications of long-term kennelling are significant. Confinement, isolation and uncertainty can lead to chronic stress, frustration, anxiety, behavioural deterioration, and even self-harm. We have witnessed this first-hand in previous cases. For example, “Mr Bronx,” a dog seized under suspicion of being a Pit Bull, was kennelled under restrictions

for many months. Despite best efforts, his welfare and behaviour declined severely over time, and the experience was deeply distressing for staff responsible for his care.

Under the current proposals, if an XL Bully's owner can no longer keep their dog, the transfer of ownership would be prohibited. Without a clear and guaranteed exemption mechanism, this could result not only in situations where euthanasia is the only lawful outcome, but also where prolonged kennelling causes such a deterioration in welfare that euthanasia becomes the only humane outcome. Such an outcome would be ethically unacceptable and contrary to the principles of animal welfare.

8. Recommendations for a Proportionate and Welfare-Led Framework

The JSPCA believes that Jersey has an opportunity to take a progressive, evidence-based approach to dog legislation that prioritises both public safety and animal welfare. We respectfully recommend that:

1. A formal consultation is undertaken with the JSPCA, the States of Jersey Police, and other relevant stakeholders before legislative changes proceed.
2. Behaviour-based assessment frameworks are considered in place of breed-based restrictions.
3. Investment in appropriate facilities and specialist training is prioritised to enable the humane, safe, and sustainable management of dogs that pose a genuine risk.
4. Public education and awareness campaigns on responsible ownership, socialisation, and training are implemented to prevent incidents at source.

Jersey can lead the way with a proportionate, evidence-led framework that keeps Islanders safe while safeguarding animal welfare. The JSPCA stands ready to work collaboratively with the Government of Jersey, the States Veterinary Officer, and community partners to help develop such policies.

About the JSPCA

Founded in 1868, the Jersey Society for the Prevention of Cruelty to Animals is the island's oldest and largest animal welfare organisation. Our mission is to prevent cruelty, promote knowledge, and provide care for the lost, aged, sick, and unwanted animals of Jersey. Through rescue, rehabilitation, and education, we work every day to protect animals and promote responsible ownership across the island.

References

Additional references: American Bar Association: [ABA Due Process Breed](#)

ⁱ Patronek, G.J., Sacks, J.J., Delise, K.M., Cleary, D.V. & Marder, A.R. (2013). Co-occurrence of potentially preventable factors in 256 dog bite-related fatalities in the United States (2000–2009). Journal of the American Veterinary Medical Association, 243(12), 1726–1736.

ⁱⁱ [End Breed Specific Legislation | BSL Dogs | RSPCA - RSPCA - rspca.org.uk](#)

ⁱⁱⁱ National Canine research Council - Worldwide failure of breed specific legislation
<https://www.fairdog.dk/elements/documents/research/world-wide-failure.pdf>

^{iv} Australian Veterinary Association (AVA) – [Dangerous Dogs: A Sensible Solution \(2012\)](#)

^v 4. RSPCA (UK) – A Dog’s Dinner: [Breed-Specific Legislation BSL_Report.pdf](#)

^{vi} [DDL0229 - Evidence on Dangerous Dogs: Breed Specific Legislation](#)

^{vii} [End Breed Specific Legislation | BSL Dogs | RSPCA - RSPCA - rspca.org.uk](#)

^{viii} [DDL0314 - Evidence on Dangerous Dogs: Breed Specific Legislation](#)