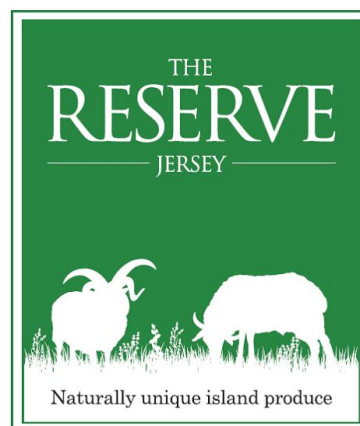


Scrutiny Submission

On proposed changes to the Animal Welfare Law



Dear Scrutiny Panel,

I write on behalf of *The Reserve*, the island's conservation grazing initiative and its largest sheep enterprise. Our work, carried out in partnership with the National Trust for Jersey and the Environment Department, is rooted in a simple belief: that the animals entrusted to us deserve safety, dignity, and the highest standards of care. Every day, our team works to protect both the landscapes we manage and the animals whose grazing sustains them.

It is with genuine sadness that I submit this letter. Farmers and animal-keepers across the island share a deep commitment to the welfare of the animals in their care. Strong, effective legislation should be a cornerstone of that commitment. Yet this review has not delivered the targeted, evidence-based protections needed to address the most serious and preventable threats faced by livestock in Jersey.

For several years, we have raised concerns with the States Veterinary Team about the urgent need for clearer, stronger safeguards. There is widespread acknowledgement that the current overlap between laws leaves a critical gap—one that directly affects the safety of animals. Despite this, neither the present draft nor the recent amendments to the Dogs Law attempt to resolve the issue. The result is a framework that continues to leave animals vulnerable where they most need protection.

I want to express sincere thanks to the Scrutiny Panel and its officers for their willingness to listen, and to the many organisations and individuals who have offered their support. Their involvement reflects a shared truth: people across Jersey care deeply about animal welfare. That such a broad coalition of experienced, compassionate voices has been set aside is troubling. It suggests a process that has not fully embraced the collaborative spirit required to safeguard the animals who cannot speak for themselves.

The consequences of this omission are not theoretical. On the island's largest sheep farm, we face the greatest threat to our animals without the legal tools required to prevent harm. It is distressing, avoidable, and fundamentally at odds with the values that Jersey holds regarding the treatment of animals.

Our aim has never been to criminalise. What we seek is the ability to educate, to intervene early, and to prevent suffering before it occurs. These are the foundations of good animal welfare. Without them, we are left responding to harm rather than preventing it—and the animals pay the price.

I respectfully urge the Panel to recognise the seriousness of this gap and to recommend the necessary amendments before the legislation progresses further. Jersey's animals deserve better protection, and the island's reputation for high welfare standards depends on a system that reflects both compassion and common sense.

Yours sincerely,

Aaron Le Couteur
Founder and Director

Encl: *Appendix A: Project Brief-Dog Worriing 2025*
Appendix B: 6 July 2025 The Reserve Submission to States Vet
Appendix C: 8 July 2025 JFU Submission to the States Vet
Appendix D: 10 July 2025 Grazing Partners Submission to the States Vet

Tackling the increasing incidence of Livestock Worrying in Jersey



In partnership with the National Trust for Jersey and the Land and Resource Management Team we actively manage over 1,000 verges of the island's most important sites for wildlife. In 2025, the direct value of the project (not including biodiversity net gain or natural capital calculations) to the island will be in excess of £450,000.

The project is now in its 16th year and death and injury caused by dog attacks is by far and away our greatest welfare issue and its increasing frequency and severity poses an existential threat to our project and livestock keeping in the island more generally.

The increasing incidence and impact of dog worrying is a problem shared and acknowledged by our neighbouring jurisdictions. Both the UK and Guernsey are suffering from the same issue but are taking proactive steps to address the issue.

In the UK the [Dogs \(Protection of Livestock\) \(Amendment\) Bill 2024-25](#) is currently in train and in the most recent Action Plan for Animal Welfare stated:

“We are aware that dog attacks on livestock are a serious and growing concern to rural communities, police forces and farmers. Livestock worrying can cause much emotional distress, to all who see the aftermath and can be economically catastrophic to the livelihoods of our farmers.”

Throughout the life of the project we have made numerous attempts to resolve and mitigate the impact of dog attacks, but have now exhausted all non-judicial routes. As both the Animal Welfare (Jersey) Law 2004 and the Dogs Law (Jersey) 1961 are subject to review it's imperative this issue is finally given the impetus it deserves whilst these laws are being considered.

We have committed ourselves to farming in the public eye and for the public benefit and we now need support from lawmakers to keep this valuable project viable.

Our main proposal is very simple, and mirrors existing UK legislation to allow farmers and landowners to mandate the use of leads on certain sites, providing a suitable legal vehicle (with appropriate accompanying fines) to match the legislation that already exists for our beaches and public parks. This will allow us to proactively prevent the vast majority of attacks from happening and will help bring our outdated legislation in line with that of the UK and help provide the island's livestock with the degree of legal protection they need and deserve.





The Problem

The leading UK authority on this subject is the National Sheep Association (NSA) who run annual campaigns and collect statistics on the subject. [The most recent report](#) highlights that **“sheep attacks by dogs are becoming more severe with a greater level of injuries”** and also cite an increasing concern for farmer welfare when having to deal with these incidents.

Guernsey is also witnessing the same increasing issues as highlighted by an [article in the Guernsey Press](#) in April 2025 in which Guernsey Farming President stated:

“During Covid and post-Covid there seemed to be a steep rise in dog ownership and we’ve certainly seen a significant increase in incidents. Being a small island we’re very close to communities and that probably exacerbates the problem”

In 2024, the NSA also surveyed UK Police Forces, who considered that:

“Dogs off lead and not under control was the main cause of attacks, followed by lack of responsibility, education and disrespect for livestock/farming.”

The significant reduction in the number of livestock farms in Jersey may have mitigated the issue to some degree, but as the island’s largest organic farm and only sustainable non-dairy livestock enterprise our animals are suffering as a direct result of poor legislation, inconsistency and the lack of effective enforcement of existing legislation.

However, it’s not only our wildlife project that’s suffering as a result. The [JEP recently reported](#) on ongoing issues on an area of the north coast that has led to the death of a cat and ongoing serious issues for the landowner, which may ultimately result in access being revoked for all islanders.



Figure 1: JEP report from 26th April 2025

I would politely encourage you to read the full JEP article linked above to get a good understanding of the consistent issues being faced across the island due to the growing number of irresponsible dog owners.

Families and responsible dog owners are also being impacted by these incidents. We are regularly petitioned by the owners of nervous, young or reactive dog owners who are looking for sites that they can use where they can guarantee all other dogs will be on leads, but unfortunately due to the lack of legislation few such sites exist and many of these owners are forced to walk their dogs in unsociable locations or during unsociable hours. I have also received numerous complaints from families hoping to use some of the islands beautiful sites (including the sand dunes) for picnics or other family activities, only to be forced away by unruly dogs and irresponsible owners.

We have suffered hundreds of cases of dog incidents throughout the life of the project, ranging from minor incidents where the owner was able to regain control of their pet relatively quickly to a number of times where multiple animals have been chased to their death, more often than not with no sign of those missing animals until they start washing up on beaches a few days later. Throughout all those cases, enforcement of the existing legislation has been imperfect and the overlapping legislation (both the Animal Welfare Law and the Dogs Law) appears to cause confusion with the SOJP and the States Veterinary Officers.

Impacts on Animal Welfare

In cases of injury and death, which are unfortunately common, there is the obvious impact on the affected animals. These can range from relatively minor skeletal-muscular injuries to death, all of which cause totally unnecessary and preventable suffering.

In cases of injury, [only 20% of the time will the dog owner contact the authorities or keeper](#), meaning that in 80% of cases animals are left to suffer due to an irresponsible dog walker. This is obviously unacceptable, and so something must be done.

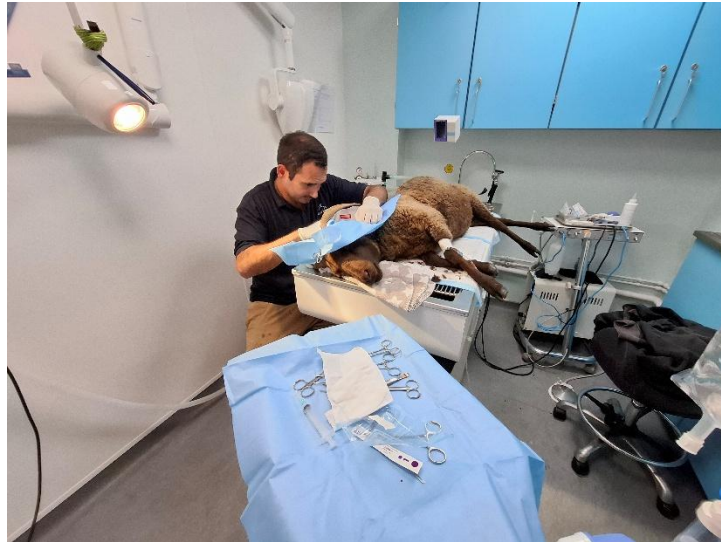
In addition to direct injury, livestock chasing is also a huge problem. Our rare breed sheep graze some of the island's most important wildlife sites and in order to have a positive impact they need to remain free from anxiety. Regular dog worrying by irresponsible dog owner's reduces the amount of time our sheep have each day to graze and impacts our ability to manage these special places for the benefit of all islanders.



The above images show a recent and separate case where our breeding ewes were chased for an extended period of time on private property where no public access is permitted. An irresponsible dog owner watched as her dog chased the pregnant sheep backwards and forwards across a brook until they were exhausted to the point of collapse, resulting in a number of miscarriages. There was an eye witness who stepped in to try and stop the attack and two independent witness accounts but the SOJP (and States Veterinary Officers) felt the attack did not meet the current threshold of a welfare offence.

Economic Impact

Another consideration is the major economic impact on the project. Some of these can be clearly defined, such as another case in November 2024 where a dog attacked a mob of our breeding ewes in a private enclosed meadow near Hamptonne Museum (separate to all those attacks above). The owner of the dog did not make contact with either ourselves or the authorities and the animal was left to suffer. When found we rushed the ewe for emergency surgery (pictured below) which cost £945.06 for emergency surgery. Our thanks go to the diligent professional staff at New Era for their continued assistance in these horrible cases.



In addition to Veterinary costs we incur other additional costs every time an incident occurs as we have to conduct extra post-incident welfare checks as well as round-ups and additional post-veterinary care. Depending on the site and the incident, this can take many hours and prevents us from doing other critical non-preventable work.

Other Impacts

Worrying also impacts the behaviour of the flock, where in many instances repeated dog worrying will cause the flock to avoid vast tracts of our sites, meaning they are not able to be managed as prescribed.

Attempting to educate and inform members of the public who choose to run their dogs off lead around livestock are increasingly escalating into confrontation (both for ourselves and concerned members of the public). We consistently deal with this growing minority of dog owners in a calm and professional manner, but as we have no recourse when people refuse to comply with a polite request to put their animal on a lead we are powerless to prevent attacks from happening.

These confrontations now occur on a daily basis, and while some of these dog walkers will reluctantly put a lead on their dog when engaged with, many will simply refuse to.

These aggressive individuals are increasingly impacting our small team and we should not have to be subject to any degree of verbal abuse, but when we have no legal right to ask an owner to comply the sense of responsibility and helplessness combined is greatly exacerbated.

Ultimately, these sites are an incredible asset to the island. This includes their value to tourism, biodiversity, islander's wellbeing and farming not to mention the many hobbies and recreational uses that we enjoy from flying gliders to the annual island walk. Unless something is done to redress the balance a small minority of irresponsible dog owners

may well ultimately lead to many of these sites (including many of the island's reservoirs) being closed to the public.

Proactive History

We have not come to the conclusion that legislative fixes are necessary lightly. We began in 2009 by mirroring the legislation and simply requiring that dogs are kept 'under control' at all times. Unfortunately over the first 5 years of the project it became clear that this term was far too loose and that people's definition of 'under control' varied greatly.

We then went on to request all dogs be on leads whilst on our sites, but this polite request is now being blatantly, flagrantly and regularly ignored as well as having our signs forcibly removed and fences and gates being vandalised and wedged open.

Despite this, incidents continued to increase in both severity and frequency. [The article below from 2017](#) illustrated a case where an owner with two dogs allowed his dogs to chase five of our sheep (including a prized rare ram) to their deaths, the rescue of the remaining sheep was only thanks to the expertise and professionalism of the Jersey Fire and Rescue Service, to whom we are incredibly grateful.



Unfortunately, the owner was already known to SOJP and had been accused of causing "injury and distress" to another dog on the beach at Greve de Lecq months earlier. Unfortunately, the SOJP were of the opinion there was insufficient evidence to prosecute our case despite the owner being identified, having admitted to losing control of his dogs and my witnessing the immediate aftermath of the attack. This failure to prosecute led to a further case where these same dogs killed a further three animals.

This case highlights the problems being encountered by the current state of legislation and guidance and illustrates quite clearly that more must be done.

Throughout the history of the project we have engaged multiple methods of public and private engagement, many of which we feel have been very successful. We have offered free training and awareness courses, publicised incidents for their cautionary impact, worked with individual stakeholder groups and have consistently erected signage.

Unfortunately those proactive actions and appeals can only go so far. The reasons for that are two-fold. Firstly there will always be a small minority of people with a lack of social conscience or understanding, some of which have even stated that their dog frantically chasing sheep is “just having fun”. Unfortunately these people fail to respond to rational argument and often become aggressive.

The second, and harder demographic to manage, are the growing number of inexperienced owners. Our estimates are that this group is responsible for approximately 80% of the dog attacks that our livestock suffer and in these cases the owner is universally mortified and upset once the dog has been caught or restrained, often so mortified they do nothing to intervene but simply stand watching events unfold. The most common message from these inexperienced owners is ‘I never thought my dog would do that’ whilst accepting fully that they knew livestock were in the area, in addition at least two of these dogs have fallen to their death while attacking our livestock. The legislation we are seeking is as much to help these unconditioned owners ensure they take the reasonable steps necessary to prevent these issues occurring as it is to protect our livestock.

Next Steps

There are a number of necessary steps that must be taken to address this growing issue. These are summarised below, but we believe that meaningful consultation with stakeholders including land owners, dog owners, site stakeholders, veterinary practices and livestock keepers should be set in train to ensure the resulting outputs are fit for purpose.

A singular point of contact and lead authority

First and foremost we need a single island authority to take ownership of this issue which as stated is the single greatest threat to our animal’s welfare. I understand that it is an unpopular subject matter but professional guidance is desperately needed to ensure the issue is dealt with consistently and fairly across the island, including acknowledging the severity of the issue and creating guidance notices to allow the two laws to work effectively together as was intended in their drafting (*N.B. Article 30 of the Animal Welfare (Jersey) Law 2004 specifically allows the court to cancel an owner’s dog*

licence whilst Article 4 specifically cites worrying and terrifying livestock as ‘Cruelty and unnecessary suffering’).

Mandating leads in livestock areas

The main legislative requirement is the mirroring of existing provisions in both the **Policing of Beaches (Jersey) Regulations 1959** and the **Policing of Parks (Jersey) Regulations 2005** to provide the same legislative mandate for beaches and parks to be extended to grazing sites across the island where animal welfare is at risk. This will also go some way towards equalising the protections we have for livestock in Jersey compared to that available in the UK.

Improvements to Existing Legislation

As well as mandating leads in certain areas there are a number of deficiencies in current legislation that should be addressed to ensure the extant legislation can work as intended. These are complex issues, so again meaningful consultation will be necessary to ensure these historic legislative issues are effectively resolved.

Our initial thoughts on extant legislation are as follows:

Dogs (Jersey) Law 1961

- Include the ability to mandate dogs on leads in livestock areas with appropriate penalties and offences for repeat offenders.
- Redefine ‘agricultural land’ and ‘public place’ to ensure dogs can be seized on agricultural land and that all land in Jersey is protected
- Remove the ability of a centenier to receive a fine of twice the fee in lieu of a prosecution or increase the level of the fine to act as a suitable deterrent.
- Remove the need to have an address on the dogs collar, but replace it with their licence number.
- Make it an offence to allow a dog to stray or to be out of sight of the owner unless under specific circumstances.
- Provide parish officials with the ability to endorse dog licences with the need for dogs to be on a lead at all times whilst away from the home.
- Create provisions for immediate restrictions to be imposed on dogs that have allegedly worried livestock up to the time the case is heard.
- Introduce appropriate offences for anyone that fails to report an incident.
- Remove ‘worrying’ to instead focus on simply chasing or disturbing livestock. Remove livestock worrying from the legislation to ensure that it is dealt with appropriately under existing animal welfare legislation.
- Define ‘fit and proper’ in regards to those persons given charge of a dog by the owner

- Expand on the definition of ‘kept under proper control’ in court orders (Article 11B) to include the mandated use of a lead and/or muzzle whilst in public.
- Increase the fine being able to be levied by a Centenier under Article 13A from £400 to £1,500, and apply the said fines to the benefit of the parish authority (as per Article 10 of the Policing of Parks (Jersey) Law 2005).

Animal Welfare Law (Jersey) 2004

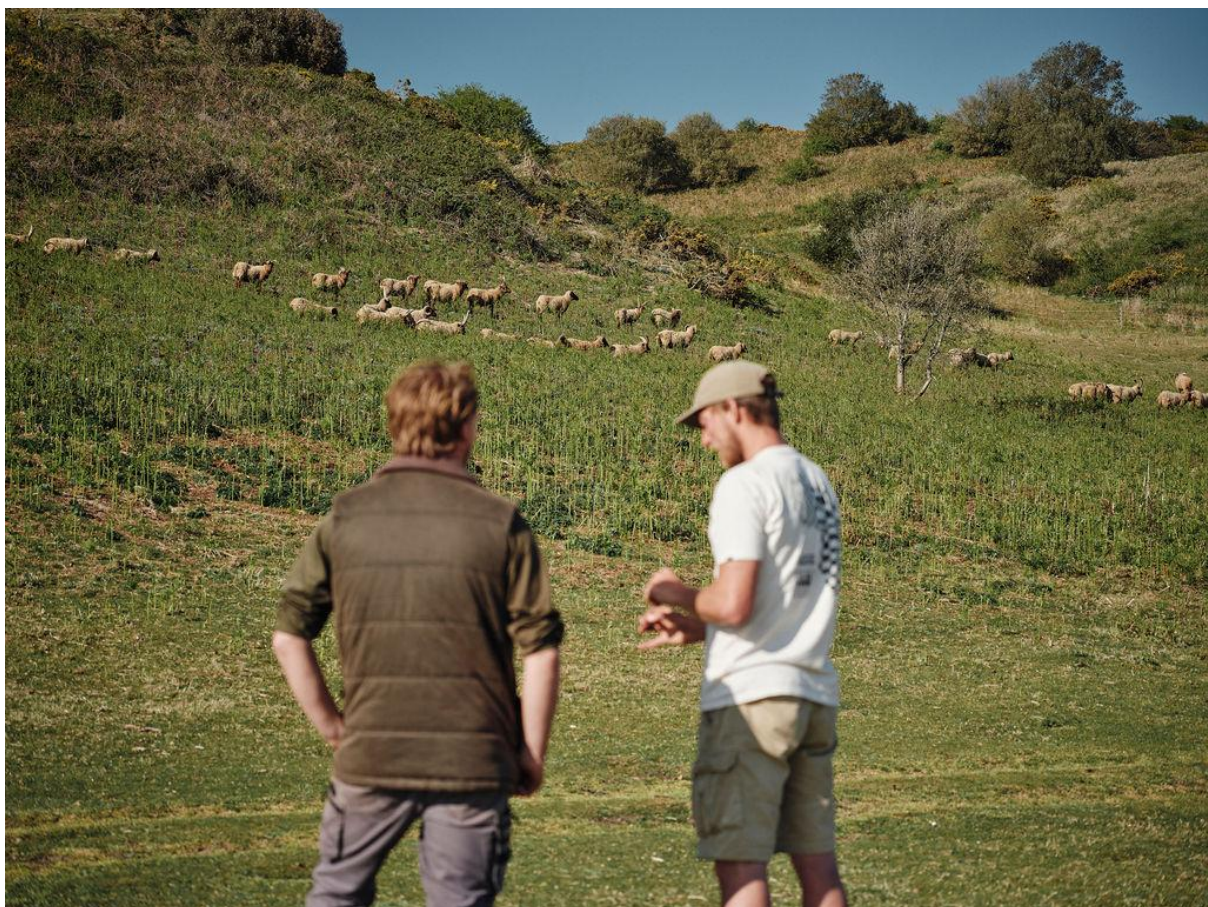
- Clearly define ‘livestock worrying’ and make it clear that omitting to control a dog in your care is an offence under Article 4 (as currently covered in Article 8).
- Increased penalties including the ability for the victim to recover both external and internal costs.
- Include professional ‘dog walking’ as a licensable activity
- Introduce appropriate offences for anyone that fails to report an incident.
- Introduce permanent penalties for offences such that a dog that has caused injury or worrying to sheep must be on a lead whilst in public.
- Provide ability for landowners and occupiers to lawfully collect covert surveillance footage (in limited circumstances).

Conclusion

This document aims to summarise the issues we face and make positive constructive suggestions that would alleviate the issues. Whilst we cannot expect these incidents not to happen at all, the current lack of support for these issues is undoubtedly having a negative impact on the welfare of our animals and failure to address these issues now will have long lasting effects.

What many people may fail to see is just how heart-breaking and futile our current situation is. It's not only unfair by affording inadequate protection for the island's animals but it also has a dramatic effect on livestock keepers. Farming is an incredibly tough industry and constant concerns for the welfare of our livestock on an island where there is no effective legal recourse to protect them has long term psychological effects as well as the clear financial, administrative and resource burden that comes with dealing with these cases.

The problem is a perfect and apt example of a 'tragedy of the commons', and therefore clearly requires the appropriate engagement by the States Veterinary Officers and Constables before sites are closed or grazing livestock in the island becomes unviable.



From: Aaron Le Couteur
Sent: 06 July 2025 18:12
To: rva@gov.je
Subject: AWL Consultation Response

To whom it may concern,

Please find below an abridged consultation response to the planned revisions to the Animal Welfare Law (AWL).

My first concerns arise as to the nature and breath of this consultation. The consultation period was short (just three weeks) and in the busiest time of the year for livestock keepers. On top of this I find the very narrow list of consultees concerning. I know the JFU were consulted after they actively engaged the department first but as the islands largest sheep farmer I am very surprised this consultation wasn't sent out to keepers such as myself. In addition, I find the lack of consultation with the professional veterinary industry here concerning, as I am sure these professionals would have appreciated an input into what they consider are the strengths or weaknesses of such a pivotal law, which in turn would have ensured the output was well researched and evidenced.

As it stands I'm afraid I have some serious concerns with the proposed draft. Outside of the legislation to protect human health I believe this is one of the most fundamental pieces of legislation in a society, and it's certainly true to say that the welfare of animals is one of the few issues that resonates strongly across our society. With that being the case I'm afraid the drafting has failed to address what, in my professional opinion, is the biggest welfare concern on the island by a wide margin, and that is dog attacks. I have petitioned the SVO a number of times as to the importance of creating provisions in the AWL to protect our livestock from this ongoing and increasing threat and yet there is nothing in this legislation to address that in anyway. I am aware that a dogs law exists, but when attacks clearly and regularly threaten the welfare of our animals there must be provision in this law to protect them and us.

Whilst dog attacks, which are responsible for at least 10 animal deaths and numerous worrying events each year are ignored, new provisions to target farmers who are unable to afford the replacement of derelict fence lines has been added. My major concern with the articles on 'straying animals' is how far out of sync it is with the modern reality of farming, and how completely at odds it is it with supporting the industry. When a farmer has an animal out it creates a very stressful event and requires he or she drops everything and attends immediately. This new provisions does nothing to help that but adds increased pressure to that keeper who in 99% of cases will work diligently and tirelessly to improve that fencing to ensure it doesn't happen again. That being said livestock escapes are an unfortunate reality and prosecuting farmers for it on an island like Jersey is unconscionable.

In addition, we operate numerous open access sites where people often wedge gates open or trample fence lines (I've even had an airplane knock down a fence), and so this legislation could unwittingly stop either that public access or grazing as a management tool on these important sites. As a service provider for both the National Trust and Government of Jersey, we graze many sites for which we are not responsible for the fencing, and so we cannot be held liable for the fencing, or for the actions needed to rectify them. We do the best we possibly can with what limited resources we have. Finally when it comes to 'straying livestock', there are a number of sites in Jersey (as there are in almost all other jurisdictions) in which livestock on certain roads are an indispensable part of site management. Sites such as Noirmont, Plemont, Grosnez, Egypt, La Coupe are all sites that could benefit from conservation grazing or 'rewilding' including allowing stock access to certain roads by way of a cattlegrid or other means. This poorly thought out legislation would prevent that and dramatically impact conservation grazing or any rewilding provisions over the next 50 years.

I am also concerned that this primary legislation sets some very wide ranging order making powers. While I wholeheartedly believe much more needs to be done for animal welfare in Jersey I'm afraid my concerns with the direction of this draft translate into concerns with what other poorly considered articles may find their way into subordinate orders. I am also concerned that there is no mention of standards of competence for officers and that there is no objective way to challenge the newly created references to an inspectors 'opinion'.

I have struggled in farming for 16 years and now have the privilege of being responsible for the island's largest organic farm and largest sheep enterprise. In failing to address the growing impact dog attacks are having on our animals, our livelihood and our wellbeing whilst simultaneously persecuting us for doing what we can with what we've got is extremely demoralising, and such increasing liabilities will be yet another reason for young people to turn away from the industry.

I implore you to meaningfully engage with industry on this legislation, including local vets and keepers such as ourselves,

Kind regards,

Aaron

Aaron Le Couteur

BSc(hons), MRSB

The Reserve

Bramble Farm, La Rue de Crabbe, St. Mary, JE3 3AD

Mobile: 07797 789202





8th July 2025

Susana Ramos, DVM, MVPH, MRCVS
States Veterinary Officer
Natural Environment Department
Howard Davis Farm
Route de la Trinité
Trinity
JE3 5JP

Dear States Vet

Thank you for your letter of 16th June regarding the new draft Animal Welfare Law.

We have been disappointed that the consultation has been launched at the busiest time of the year for farmers, with very little notice and giving little time to make a submission.

The JFU is in dialogue with the dairy industry in the Island and we are in step with their comments on the draft Animal Welfare Law.

We are concerned that the new Animal Welfare Law will give the Minister the power to make Orders, which will not be subject to overview by the States Assembly or Scrutiny. These Orders could be wide ranging and we are concerned about what they may contain and how they could have a big impact on farmers.

Our office has been contacted by Aaron Le Couteur who has raised some very valid points about the draft Animal Welfare Law. We hope that the points mentioned in his submission are taken on board.

Yours sincerely

A handwritten signature in black ink, appearing to be "Douglas Richardson".

Douglas Richardson
President

aaron_le_couteur@hotmail.com

From: Marc Woodhall <m.woodhall@gov.je>
Sent: 10 July 2025 13:08
To: Susana Ramos; Ashley Pinel
Cc: Alan Le Maistre; Henry Glynn; Louise Whale; Tim du Feu; Tim Liddiard; Tim Wright; Tina Hull; Aaron Le Couteur; William Peggie
Subject: Submission to the draft Animal Welfare Law consultation

Dear Susana/Ashley,

Please find below a brief submission to the consultation from partners working under the umbrella of the Jersey Conservation Grazing Project. Those partners include Government's Land Resource Management Team, The National Trust for Jersey and The Reserve Jersey.

I know that the official deadline for submission has passed but I understand Tim du Feu spoke to you recently about accepting an additional submission.

Kind regards
Marc

Marc Woodhall MCIEEM
Environment Manager – Enhancement
Land Resource Management

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Mobile +44 (0)7797 779434

Government of Jersey
Howard Davis Farm | Trinity | Jersey | JE3 5JP



Infrastructure, Housing
and Environment

SUBMISSION TO THE CONSULTATION ON THE DRAFT ANIMAL WELFARE LAW - 10.07.25

Dear Susana,

We write to you as a joint working group that coordinates the delivery of conservation grazing across large areas of semi-natural and ecologically important land. This work is critical. Manx Loaghtan sheep are used to reverse the deterioration of many parts of the island's countryside, especially the hard-to-reach areas along the island's coastal slopes and sand dunes.

Our conservation grazing group consists of the Government's Land Resource Management team, The National Trust for Jersey and The Reserve Jersey. The group has been established for a number of years and now operates under an SLA for the delivery of conservation grazing to both supplement and replace land management activity for the benefit of the Island's rich natural environment.

We are aware that The Reserve Jersey (through Aaron Le Couteur) has made an independent submission to the draft Animal Welfare Law consultation (and also had their views endorsed by a submission from the JFU) and we are seeking to provide a similar level of endorsement through this short submission because we feel that there are issues that could further enhance the value of our existing partnership and what it brings to the Island.

From our perspective we would like to re-iterate two main points (made in other submissions) as part of our response to the consultation:

- Our view that there is currently insufficient provision for the welfare of livestock through protection from dogs and their owners
- The possible difficulties that may be faced as a result of proposals relating to fencing and straying livestock

Our group has seen a long-term and steadily increasing rise in the number of incidents involving dogs and livestock (which for us specifically refers to sheep).

We acknowledge the discussions that have been had about revisions of both the Animal Welfare Law and the Dogs (Jersey) Law and believe there may be opportunity under both sets of legislation to improve the situation as regards conflict or otherwise between dogs and livestock and its implications. Ultimately, we believe that provisions in the Animal Welfare Law need to secure clear and enforceable legislation to protect the health and welfare of sheep within this critical work (and include other livestock types, should our activities expand).

Specifically;

1. The draft legislation in its current format does not, in our view, respond to the increasing threats we've seen to livestock and their welfare, under the umbrella of this project. Sheep and cattle involved in conservation grazing are inherently exposed more to dog worrying/ attacks than when grazing on conventional farms. The livestock are on sites which are very popular for walking dogs, mostly off the lead, and not within the confines of a farm environment where dog owners are likely to pay closer attention to their dog(s). We believe that revisions to the Animal Welfare and Dogs (Jersey) Laws should consider this difference between grazing systems and balance the need for increased control of dogs in the open countryside. [Signage will be used at car parks and paths leading towards any areas under grazing to alert the public so that appropriate measures can be taken to bring their dogs under control].

It may be that the intent of revision is to deal with these issues in secondary legislation or through Orders, but without that clarity and recognising the concerns of other submissions such as those coming from the JFU, we would suggest additional safeguards or commitments are presented within this review.

As highlighted we understand that the Dogs (Jersey) law is also under review although that's not running concurrently with this review and there are no clear timeframes or intent yet as to how that review may

unfold. We do plan to engage with the Committee des Connetables on the review of the Dogs (Jersey) Law but we do not see that as the only vehicle that is needed to address these concerns.

It's also incumbent on us at this stage to state that without sufficient consideration in law, associated issues such as staff and public welfare will not be addressed, although we accept these aren't a direct component of this legislation.

2. The second issue that raises some questions and concerns for us, relates to livestock fencing and straying animals and the provisions being proposed to address this using the revised Law. The partners within our group are seeking to operate conservation grazing across large areas of Jersey, many of which are in high quality, and not easily accessible landscapes. Furthermore, to facilitate management of these extremes landscape types, the primary livestock breed we are working with across sites is the Manx Loaghtan. Aside from the practical and resourcing issues associated with maintaining and renewing typical stock fencing, we are also seeking to deploy technology that replaces physical structures. Combining various livestock control measures is a direct response to landscape, biodiversity, livestock welfare, entrenched public attitudes and behaviours and a growing understanding of the value of this type of land management activity in a world where habitat change is being driven by multiple factors, many of which are out of our control.

Add to that the inherent behavioural attributes of livestock type and breed then we feel there are always liable to be instances where trying to comply with the proposals in the Law may prove difficult and ultimately jeopardise the objectives and success of the conservation grazing project. None of the partners within this group are interested in facilitating livestock straying and the project takes its responsibilities very seriously, but we believe there needs to be a level of pragmatism reflected in the wording of future legislation to address our concerns and likely those of other livestock owners and managers.

3. We recognise that provision is made in the Law to license professional organizations such as professional dog walkers. These groups use both Public and National Trust land, causing deterioration, including but not limited to dog mess/bins. We would ask that any consideration of the cost of such licenses reflect the extra work needed in this regard.

4. Greater understanding of our position and clarity around future operational responses to any revised legislation would be welcomed by ourselves.

We thank you for the opportunity to submit our views with you and would be happy to discuss them further should you feel that was helpful.

Kind Regards

Submitted on behalf of
The Conservation Grazing Group
(comprised of Government of Jersey Land Resource Management Team, The National Trust for Jersey, The Reserve Jersey)

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