

Animal Welfare & Control (including the Draft Animal Welfare (Jersey) Law 202-) Review

Submission: The Conservation Grazing Group

Dated: 15th January 2025

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 has made an independent submission to the draft Animal Welfare Law consultation through 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 Draft Animal Welfare Law and the Dogs (Jersey) Law Amendment Regulations 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 Draft Animal Welfare Law needs 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.

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, including Ecological Sites of Special Interest 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.