



**Submission to the Review of Measures Relating to the Control of Dogs in Ireland  
August 2019**

**1. Wicklow Uplands Council**

Wicklow Uplands Council (WUC) is an independent voluntary organisation which represents over 50 diverse member groups and individuals in the Wicklow Uplands. The organisation works to support the sustainable use of the Wicklow Uplands through consensus and partnership with those who live, work and recreate there. WUC believes that the people who live, work and enjoy the uplands must be provided with opportunities to participate in the various local, regional and national decision making processes affecting the area.

**2. Introduction**

WUC welcomes the review of measures relating to the control of dogs in Ireland and the opportunity to submit its views. The consultation paper issued by the Department of Rural and Community Development (the Department) is welcome, however WUC feels it important to stress and reiterate the serious issues that uncontrolled dogs pose which is not reflected in the paper.

Dog control is a major issue in upland and rural areas right across the country. Many dog owners are not aware of the problems that their dog can create, not just for farmers and landowners, but also to other members of the general public and those who enjoy the uplands. Uncontrolled dogs in the countryside and environmentally sensitive areas create disturbances to ground nesting bird and other wildlife. Increasing recreational use in the uplands and associated issues with uncontrolled dogs in areas traditionally used for hill sheep farming has resulted in tension between farmers and recreational users. Wicklow has been at the forefront of opening up private land for recreational use but the growing presence of uncontrolled dogs is threatening existing access agreements as well as future trail developments in the county.

**3. The Issues**

Uncontrolled dogs are a serious threat to the livelihood of upland farmers. Dogs loose on the hills cause anxiety within a flock of sheep often causing them to be displaced and get stuck in rough ground and vegetation. This can lead to broken bones or starvation if the animal is not discovered in time. One of the impacts that many people are unaware is that sheep worrying can lead to the early abortion of lambs in pregnant ewes. In the very worst case scenarios, uncontrolled dogs directly attack sheep causing them severe injury or death. This is not just a problem for the landowner in terms of their livelihood but it is also a serious animal welfare issue. The problem is not limited to walker's dogs with damage often being caused by local dogs which stray from neighbouring properties and their owners are unaware of their whereabouts.

Dog owners also need to be aware of other people walking or recreating in the hills. Whether it is tourists, locals or visitors to the area, many people are genuinely frightened of dogs. It can become very unpleasant to be confronted by a dog especially if they bark or come too close to people. A

large dog can easily knock a child or older adult if they jump on them, even in a playful manner. There are also growing reports of dogs directly attacking each other while on walking trails. Small dogs have been seriously injured and in some cases the dog owners have been bitten as they try to separate them. Again this demonstrates that this is a serious animal welfare issue.

Dog fouling is a growing problem. While there is some awareness of dog fouling being an issue in urban areas, many people are unaware of the importance of clearing up dog fouling in the countryside. Dog fouling in the countryside can cause infections in people or wildlife and can cause serious illness, early abortion and death in livestock. Neosporosis, passed from infected dogs can result in abortion in cattle. Coenuriasis or 'Gid', a fatal disease attacking the brains of sheep is transmitted through worms passed in dog faeces. The parasite *Toxocara canis*, which is found in dog faeces, can cause blindness. Children are particularly at risk. This is also of great concern to the mountain biking community as faeces lodged in bike wheels can become dislodged and thrown into the air. Direct contact between faecal matter and the eye greatly increases the risk of blindness.

In general, private landowners welcome responsible recreational use of the Wicklow hills and central to this is responsible dog ownership. WUC has been working with the stakeholders to address this escalating problem.

#### **4. Wicklow Uplands Council Policy for Dog Control on Private Lands in the Wicklow Uplands**

It is the policy of WUC that dogs should be prohibited on private lands where livestock are present in the Wicklow Uplands<sup>1</sup>. In February 2013, Wicklow Uplands Council in conjunction with Wicklow IFA and the Wicklow Cheviot Sheep Owners Association initiated a campaign to erect signage on private lands in the Wicklow Uplands advising that dogs are prohibited. The signs were erected to alleviate the negative impacts of uncontrolled dog's, particularly at key visitor hotspots. A consistent message is promoted which request that, recreational users respect grazing animals, wildlife and other recreational users and to leave dogs at home. This message is in keeping with the policy of Mountaineering Ireland and Department of Defence lands in Glen of Imaal, the main access route on the western approach to Lugnaquilla.

Despite the erection of this signage there are those that continue to ignore the wishes of the landowners. Farmers acknowledge that most dog owners are responsible and leave dogs at home or keep them on a leash where permissible; however poor behaviour by a minority can threaten existing access agreements. Dog owners need to respect the wishes of landowners who do not want dogs on their land, either on or off a leash.

Current legislation which states that dogs 'need to be under effectual control' is not specific enough. Many dog owners think that their dog would never do any harm and subsequently let them run freely in the uplands. Legislation must be more specific as many dog owners will claim their dog is under effectual control when that is clearly not the case. Dogs in the countryside should be on a leash or at heel.

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<sup>1</sup> <http://www.wicklowuplands.ie/policy/dog-control/>

## **5. Response to Specific Questions in Consultation Paper**

WUC will respond to those questions which are of most relevance to the interests of our organisation

### **Q1. Should the legislation be amended to include notices, similar to those that are in place in Scotland and Northern Ireland?**

Yes. Such notices would assist in enforcing responsible dog control where there are issues with specific dogs. This would greatly assist in tackling problem dogs in a locality which are prone to wandering freely, causing nuisance or attacking livestock. It is worth noting that many local authorities are limited in terms of resources for the enforcement of dog control i.e. 2/3 dog wardens per county. Legislation should be enabling to ensure that such notices and existing legislation can be enforced effectively by relevant officers outside of the existing dog warden service.

**Q2. N/A**

**Q3. N/A**

### **Q4. Are there other initiatives that should be taken in this area?**

There needs to be much greater enforcement of the existing dog licencing system. Current records state that there were 208,098 dogs licenced in Ireland in 2018<sup>2</sup>. However some sources estimate that there are up to 400,000 dogs in Ireland<sup>3</sup>. While the document states that this responsibility lies with local authorities, legislation needs to be enforced effectively by all relevant authorities.

The current situation with two government departments responsible for dog control i.e. the Dept Rural and Community Development and the Department of Agriculture, Food and the Marine is not effective. Dog licencing and microchipping should be dealt with by one government department. One department dealing with this would all streamline the current system and would support better enforcement of the current systems.

Tackling irresponsible dog owners is a huge issue and involves education and enforcement of legislation. This could involve a national campaign or programme to create greater awareness of the issues and to encourage those that are responsible.

### **Q5. Should the requirement that all dogs be kept under 'effectual control' be made more specific? If so, what should this be changed to?**

Yes, 'Effectual Control' needs to be more specific as the term is open to interpretation. Many dog owners think they can keep their dog under effectual control, however in the presence of livestock or other wildlife, the natural instinct of the dog to chase kicks in.

As stated above, it is the policy of WUC that dogs should be prohibited on private lands where livestock are present in the Wicklow Uplands.

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<sup>2</sup> <https://assets.gov.ie/19614/2de55f5380054e5eb0032ee4e8ff4099.pdf>

<sup>3</sup> <https://dogsfirst.ie/do-you-have-a-license-for-your-dog/>

WUC acknowledges that some landowners do allow dogs on their lands but those that do request that they are kept on a leash to minimise disturbance. Therefore WUC suggests that legislation should state that dogs should be kept on a leash while in the countryside.

However there must also be exceptions to this. For example a working sheepdog, a rescue dog, gun dog or other working dog obviously needs to work at long distances from its owner. These dogs are highly trained and remain under the full control of their owner even at long distances.

**Q6. Should this Department carry out any additional work regarding the sale of dogs to reinforce or supplement the work being carried out by DAFM?**

As above, both Departments should be working together to ensure current dog control legislation is enforced effectively. While it is the DAFM that is responsible for microchipping legislation, the current legislation only allows for prosecution for failure to microchip. To date there have been no prosecutions for failure to microchip. It would be more effective to introduce fines for unchipped dogs.

**Q7 – Q10 Breed Specific Questions**

While some dog breeds are more dangerous than others it is often suggested that the owners of these restricted dogs breeds can be part of the problem. While there is currently a list of 'restricted' breeds, anyone over the age of 18 can buy and licence a restricted breed without any restriction or checks to determine if they are indeed a suitable owner or have a suitable premises to house them. Random checks on those registering a restricted breed by a dog warden could help to ensure that the dog is being treated correctly and help deter dangerous behaviour