

Hunting with Dogs Bill (NI) Call for Evidence

Countryside Alliance Ireland quick-reference response guide

This guide condenses Countryside Alliance Ireland's suggested response into short bullet points, following the same question order and format as the full call-for-evidence template.

Suggestions for those taking time to respond:

- You do not need to answer every question in detail, even a few bullet points against a question carries evidential weight.
- Where a suggested answer (e.g. "Disagree" / "Yes" / "No") is shown, this reflects CAI's recommended position, feel free to adopt it or put it in your own words.
- Personalise your response where you can: name your own trade, sector, farm, hunt, or local example. Personal testimony carries particular weight with the Committee.
- You are not required to use every bullet point below, pick the ones most relevant to your own experience.
- The Call for Evidence closes on 24 August 2026.

Questions 1–5. Name, email, organisation, privacy notice, publication preference

- Provide your full name and preferred email address.
- State your organisation/business name in full, if responding on its behalf.
- Confirm you have read the Assembly Committee's Privacy Notice (required).
- Choose how you would like your submission published, in full, or redacted of personal/identifying details.

Question 6. Do you agree or disagree with the overall aim of the Bill to prohibit hunting wild mammals with dogs?

Suggested answer: **Disagree**

- The only legitimate reason to ban hunting with dogs would be on the grounds of animal welfare. The need to manage wild mammal populations is accepted. Hunting with dogs is one of several methods used to cull wild mammals and unless it is worse in welfare terms than the alternative methods then a ban on hunting cannot be justified. The Burns Inquiry did not find that hunting was measurably worse in welfare terms than the alternatives and that the alternatives could be worse in welfare terms.
- The fact that unjustifiable bans on traditional hunting exist in other parts of the UK is not an argument for Northern Ireland to do the same.
- Mr Blair says he wants to ban hunting for sport but not for pest control. This is a false distinction, but even if it was a valid distinction the Bill does not distinguish between pest control and sport but bans hunting for any reason. It also bans the use of a dog below ground and trail hunting.
- The Bill would make the use of dogs in conservation, land management, species management and for livestock protection impossible.
- John Larkin KC (former NI Attorney General) has pointed out that the Bill could expose an ordinary dog walker to criminal liability if their dog unexpectedly chases a rabbit or squirrel. The same would be true of those using dogs in connection with shooting activities.
- The Bill's reach extends well beyond the hunting community to all those who own dogs. As Mr Larkin notes: *"Put simply, it seems to me that dog ownership would be made more burdensome if not dangerous if this Bill were to be enacted."*

Question 7. Please highlight any sectors that may be positively and/or negatively affected by the Bill

- No sector benefits from a ban. The rural economy is a single interconnected structure and harm to one sector impacts negatively on the others. The scope of the Bill is so wide that it will negatively affect a very broad range of activities and associated businesses.
- Sectors at risk include: farriers, veterinary practices, feed merchants/suppliers, horse trainers, livery yards, haulage/transport firms, cattle and sheep farmers (fallen-stock disposal, livestock protection), hunt clubs and staff, sporting estates, gamekeepers, conservation organisations, tack shops/equestrian retailers, rural tourism and hospitality, saddlers, and seasonal rural employment.
- *Suggestion: name your own sector or business connection specifically - concrete, local examples strengthen the evidential value of your response.*

Question 8. Do you consider the definition of "participation" in hunting activities to be clear and appropriate?

Suggested answer: **No**

- The explanation of the scope and effect of clause 1 in the Call for Evidence is inaccurate and misleading. It has simply been copied from the Bill's Explanatory notes. Dog walking is impacted by the Bill, as is any activity involving dogs. As John Larkin KC has noted: "The treatment of clause 1 in the Explanatory and Financial Memorandum appears to me to be misleading".
- The notes state that "participating also includes following an artificial or human scent where a dog then hunts a wild mammal". In fact, the Bill says that "*participation includes a reference to participation in another activity (such as pursuit by a dog of an artificial or human scent) in the course of which a dog hunts a wild mammal*". Pursuit of an artificial or human scent is only an example of another activity. If a dog hunts a wild mammal in the course of any other activity – dog walking, shooting, search and rescue using dogs etc – then a person has committed an offence of participating in hunting. It is irrelevant whether the person participating is responsible for controlling any dog and hunting includes searching for and pursuing. It is not necessary for a wild mammal to be killed.
- Unanswered questions: does merely observing count? At what proximity? Does viewing video footage count? Does unknowing/inadvertent involvement count?
- John Larkin KC has warned that participation could expose a dog walker to liability for their dog's actions alone, and someone accompanying a dog walker even where there was not direction given to the dogs or intention to hunt.
- For an offence to be committed it matters not "*whether or not the person is responsible for controlling any dog used*". Mr Larkin states: "*...the breadth of the concept of participation...means that persons who have no intention of hunting or who cannot be considered reckless; persons, indeed, who may be vigorously opposed to hunting with packs of dogs, can be exposed to criminal liability...In this sense the Bill may be said to provide for a species of strict liability.*"
- Criminal offences require a high degree of legal certainty so people can know what does or does not constitute criminal activity. This Bill does not provide that legal clarity.

Question 9. Do you consider the definition of "wild mammal" to be clear and sufficient?

Suggested answer: **No**

- While the definition adopted is the same as that in the Hunting Act 2004 it lacks clarity, especially given the vastly expanded scope of offences in this Bill compared to other legislation in Scotland and in England and Wales. The definition in the Hunting with Dogs (Scotland) Act 2023 is different.
- The definition is non-exhaustive. The definition includes, but is not limited to, the four categories listed. The definition creates a real risk that someone could still be prosecuted where an animal falls outside all four categories.
- How can an animal bred or tamed for a purpose be considered "wild"?
- A domesticated cat could fall within the definition, as could another dog.

Question 10. Are there any terms within this clause that require further clarification or amendment?

Suggested answer: **No**

Question 11. Do you agree with making it an offence to hunt wild mammals using dogs?

Suggested answer: **No**

- The need to manage wild mammals is generally accepted. The only justification for banning hunting with dogs would be if the evidence existed that it was less humane (animal welfare positive) than the alternatives.
- The Burns Inquiry found no evidence that hunting with dogs causes greater suffering than the alternatives (shooting, lamping, trapping).
- The Bonomy Review (Scotland) supported Burns's welfare conclusions.
- Alternative methods carry their own welfare costs: shooting can wound rather than kill cleanly and can leave dependent young to starve. Lord Soulsby, a leading vet and member of the Burns Inquiry team has stated: "...there is a major concern that, were there to be a ban on hunting, there is strong evidence that the alternatives to control in many cases are certainly less 'welfare positive' than hunting. Shooting has been mentioned by a number of speakers; and poisoning, trapping and other means of control are much more insensitive in terms of welfare than the death of the prey at the end of a hunt."
- The Bill would also make the use of dogs unlawful in connection with shooting. Larkin KC's opinion states the Bill as drafted could also criminalise lawful shooting of wild mammals for food wherever a dog plays any part in the process.
- *Ask the Committee: what new evidence has emerged since Burns and Bonomy that justifies departing from their conclusions?*

Question 12. Do you consider the scope of the offence (including organising or permitting hunting) to be appropriate?

Suggested answer: **No**

- As John Larkin KC has noted: "the use of the formula "organise or participate" in clauses 2 and 4 suggests a lack of awareness of Part IV of the Criminal Attempts and Conspiracy (Northern Ireland) Order 1983". As he notes, what is "meant by the word "organise"?" How does this differ from the existing offence of conspiracy? There are also other common law offences of enabling criminal activity – aiding, abetting etc?
- There is a serious risk that landowners who grant access to their land in good faith (to pest controllers, conservation volunteers, neighbouring farmers, etc.) could face

prosecution as a result of the conduct of others they neither permitted nor knew about.

- The risk of a "chilling effect" on the willingness of landowners to permit legitimate countryside management, conservation work, or pest control should not be underestimated, especially given the unprecedented scope of the Bill's offences.

Question 13. Do you agree with the prohibition of trail hunting as set out in the Bill?

Suggested answer: **No**

- Trail hunting involves no live quarry, a pre-laid scent is followed, so no wild animal is pursued, captured or harmed. If a wild mammal is involved then it is, by definition, not trail hunting.
- To ban an activity on the grounds that it might be used as a "smokescreen" for unlawful activity is extraordinary.
- Drink driving is an offence, but we do not ban driving because some people continue to drink and drive. As Baroness Hoey observed in the House of Lords: *"If a couple of Peers behave badly, we get rid of them; we do not get rid of the whole House of Lords"*.
- There is no reason to single out trail hunting for a ban. If hunting with dogs is banned then the issue is proper enforcement of that ban, not criminalising a separate and unrelated activity.

Question 14. Do you consider the definition of "trail hunting" and "animal-based scent" to be clear and workable?

Suggested answer: **No**

- The notes that accompany this question in the Call for Evidence replicate those from the Explanatory Memorandum. In doing so they contrast trail hunting with drag hunting and define drag hunting as being; "where dogs are given the scent of human runners and the hunt chases those humans". This is simply wrong. This is a description of clean boot hunting and not drag hunting. This is perhaps illustrative of the lack of knowledge and understanding behind this ill-conceived, unnecessary and damaging Bill.
- "Animal-based scent" covers anything that "mimics, replicates or resembles" a wild-mammal scent, including partly artificial ones, with no specific chemicals or compounds identified. A subjective "resemblance" test provides no reliable way to determine compliance, especially given continually evolving synthetic scent-replication technology.
- The offence would prohibit the use of dogs in the management of rodents, such as mice and rats.
- No person using dogs could rely of the exemptions under the Bill without committing an offence of trail hunting. The drafter of the Bill seems to have failed to recognise that the Bill creates a number of offences other than the main hunting offence.
- The use of dogs in connection with rough shooting (hares, rabbits etc), deer stalkers, pest controllers (including farmers), those following up wounded animals, all would be committing the offence of trail hunting.
- John Larkin KC states: *"...the effect of the Bill is to ban all hunting of wild mammals whether for recreation or food if a dog is used, even if the dog is never used to kill the hunted animal. While it will still be permitted to shoot birds using a dog, it will not be permitted to shoot deer or rabbits for recreation or for the purposes of eating them or for a combination of both of these purposes...If this Bill is enacted, "Shooting for the pot" is, if a dog is used, rendered unlawful."*

Question 15. Do you agree with the prohibition of terrier work?

Suggested answer: **No**

- Terrier work is a specialist, often irreplaceable tool for livestock protection, conservation, land management and predator control.
- The evidence of the Glenwherry Hills Regeneration Partnership Project (CAFRE, RSPB, Irish Grouse Conservation Trust) demonstrates that predator control, including terrier work, has been vital to support recovery of red-listed Irish grouse and breeding waders including curlew.
- The Scottish legislation passed in 2023 is described by Mr Blair as being “the most robust framework anywhere in the UK” but ignores the fact that the Scottish legislation allows for the continued use of a dog below ground. There is also an exemption for terrier work in the 2004 Act in England and Wales.
- As Lord Bonomy found: “... *Were the use of terriers below ground to be prohibited, then a significant proportion of the fox control work of mounted and foot hunts would be wasted effort. The fox having been located, the terrier is seen as part of the team to be deployed when otherwise the fox would escape to cause more damage...The fox can cause considerable loss to country enterprises through predation on poultry, game and livestock, particularly lambs. There is a powerful argument for completing the fox control exercise by digging out the fox once it has been located...The material presented to the Review is persuasive of the need for the use of terriers to ensure the despatch of a fox gone to ground...*”.
- In Scotland the 2023 Act also recognises the importance of terriers to locate injured or dependent foxes so as to relieve suffering. This provision was included in the original 2002 legislation with the support of the Scottish Society for the Prevention of Cruelty to Animals.

Question 16. Do you consider the definition of terrier work to be appropriate?

Suggested answer: **No**

- The definition of terrier work is so broad that it would not simply preclude the use of a dog below ground but also prohibit dogs in barns, buildings and outhouses and dogs above ground in any enclosed space.
- Mr Blair has stated: “*The term “enclosed space” is a generic but inclusive term...It could be a barn, a cave, a hole in the ground or a shed...it is a catch-all option*”.
- A farmer or pest controller using dogs to locate rats or mice or any wild mammal using dogs is not only guilty of trail hunting but also in many situations of terrier work.
- The definition of terrier work would make reliance on the exemption for the management of wild mammals above ground (Clause 7) problematic in many situations where dogs end up flushing from an enclosed space above ground such as a pile of stones, a drainpipe or stack of bales.
- As Mr Larkin KC has noted: “*A farmer who had a problem with vermin in barns or outhouses would be seriously impeded in his or her ability to protect his property...a farmer could not, without exposing himself to liability under that provision, encourage his dog or dogs to follow the scent of rats who were devouring his grain with a view to a dog finding the rats and destroying them*”.

Question 17. Do you foresee any unintended consequences for land management or pest control if a ban on terrier work is introduced?

Suggested answer: **Yes**

- The Bill makes it impossible to undertake pest control below ground or enclosed spaces such as barns, and in many situations above ground. It will make effective

pest control impossible for farmers and land managers and professional pest controllers.

- AERA Committee site visit to Glenwherry Hills, 3 July 2025: gamekeeper Merlin Becker said terrier work is core to his fox-control programme, especially in the denning season, and losing it "would greatly affect my work in the spring"; curlew conservation would become "such a more difficult job" without it.
- Mr Blair has stated: *"The term 'enclosed space' is a generic but inclusive term...It could be a barn, a cave, a hole in the ground or a shed...it is a catch-all option"*. The use of dogs, especially terrier work, is supported by wider conservation research showing sustained predator management improves nesting success in curlew, lapwing and golden plover.
- The Bill represents a major threat to effective wildlife management in Northern Ireland and risks the future of the Irish red grouse, one of the few genuinely native species.

Question 18. Do you agree that the proposed penalties are appropriate?

Suggested answer: **No**

- The penalties for offences under the Bill exceed those for the wildlife offences under the current Wildlife (Northern Ireland) Order 1985, into which the Bill inserts the various groups of offences under the hunting, terrier work and trail hunting clauses.
- The Bill creates the absurd situation that someone who commits a wildlife offence under the 1985 order can only be imprisoned for a maximum of six months on summary conviction but a person who "participates" in hunting or uses and follows an animal-based scent (trail hunts) can face 12 months on summary conviction or on indictment up to five years in prison. The penalty for the activity of trail hunting where no wild mammal is involved is greater than for offences such as taking or killing protected wild animals. There is a similar discrepancy with fines, which can be imposed instead of, or in addition to, custodial sentences.
- It seems following an animal-based scent is more heinous than the actual unlawful killing of wildlife.

Question 19. Do you agree with the exemption for the hunting of rats and mice?

Suggested answer: **Yes**

- Control of rats and mice is important but so is the control of rabbits, foxes, stoats, weasels and other wild mammals. If hunting is no worse than other methods of control then why single it out for a ban?
- As a matter of logic, rats and mice are no less sentient than other mammals covered by the Bill and the exemption exposes an inconsistency in the Bill's claimed welfare basis.
- The exemption suggests species are being distinguished based on public sympathy rather than evidence-based welfare science.
- Poison remains lawful for rats/mice despite causing prolonged suffering, while a rapid method (dogs) is proposed to be banned for other species.
- In any case, the Bill would make use of dogs in the management of rats and mice largely impossible due to the nature and scope of the offences created.

Question 20. Do you agree with this exemption for the management of wild mammals above ground?

Suggested answer: **Unsure**

- The exemption should be unnecessary as there is no justification for a ban on the traditional use of dogs in wildlife management.
- The inclusion of the exemption is explicit recognition of the need for controlling wild mammals. It therefore highlights that banning traditional hunting in the absence of evidence that it is worse in welfare terms is unprincipled and illogical. It also demonstrates that hunting cannot be classified as cruel, legally defined as the causing of “unnecessary suffering”. Controlling wild mammals is necessary and any suffering is no worse than the alternatives that would replace hunting. Indeed, in welfare terms hunting is often preferable in welfare terms to the alternatives.
- The attached conditions suggest very limited input from practitioners. The two-dog limit ignores the findings of the Bonomy Review and peer reviewed research that is recognised in the 2023 legislation in Scotland that enables packs of dogs to be deployed for effective pest control.
- Merlin Becker's evidence to the AERA Committee (3 July 2025) confirmed the two-dog model "doesn't work" in practice. This is also the view of the League Against Cruel Sports and Lord Bonomy.

Question 21. Do you consider the stated purposes (e.g. preventing damage, disease control etc) to be appropriate and sufficient?

Suggested answer: **No**

- The permitted purposes fail to account for game birds, or other property as included in the Hunting Act 2004.
- It is unclear whether the exemption allows for the protection of foodstuffs for human consumption.
- The exemption also fails to account for the use of birds of prey to despatched flushed wild mammals or for the use of dogs to flush wild mammals for human or animal consumption.
- In England and Wales and Scotland the legislation is drafted so that falconry, game shooting and deer stalking remain lawful. As John Larkin KC has noted: *“...the effect of the Bill is to ban all hunting of wild mammals whether for recreation or food if a dog is used, even if the dog is never used to kill the hunted animal. While it will still be permitted to shoot birds using a dog, it will not be permitted to shoot deer or rabbits for recreation or for the purposes of eating them or for a combination of both of these purposes... If this Bill is enacted, “Shooting for the pot” is, if a dog is used, rendered unlawful”.*
- The offence of hunting participation offence would also leave those using dogs in connection to the shooting of birds at serious risk of prosecution.

Question 22. Do you consider the conditions (e.g. use of no more than two dogs, provision to control dogs) to be appropriate?

Suggested answer: **No**

- The two dog limit in the exemptions in the Bill would mean that farmers and keepers would be unable to manage foxes with resulting harms to kept animals and wildlife. There never has been any rational basis for a two dog limit since it was arbitrarily imposed in England and Wales. Since then, peer-reviewed research has shown that it increases the time before a fox is flushed to be shot and that fewer foxes are flushed. The result is ineffective pest control and increased periods of pursuit. Those opposed to hunting argue that the chase is welfare negative. If so, a two dog limit increases any period of pursuit and according to their own arguments must therefore be less favourable in welfare terms than using a pack.

- Douglas Batchelor, then Chief Executive of the League Against Cruel Sports, stated in August 2005 with reference to the Hunting Act in England and Wales: *"The gun packs have realised that pairs of dogs are utterly useless in flushing to guns..."*.
- Lord Bonomy rejected the argument for a two dog limit outright: *"...I am persuaded by the submissions and such other evidence as there is, in particular that of the experience of those who work with packs, the scientific study paper by Naylor and Knott (taking full account of its limitations and the criticisms made of it) , and the fact that in England and Wales hunts do not generally flush to guns using two dogs, not only that searching and flushing by two dogs would not be as effective as that done by a full pack of hounds, but also that imposing such a restriction could seriously compromise effective pest control in the country, particularly on rough and hilly ground and in extensive areas of dense cover such as conifer woodlands..."*
- Merlin Becker's evidence to the AERA Committee was clear: *"It's two hounds per pack which essentially doesn't make it, it doesn't work... I would be breaking the law if my two German Pointers and my Springer Spaniel chased a rabbit."* He also noted Perthshire gamekeepers abandoned legal control under the Scottish model, and local curlew populations "are just gone."

Question 23. Do you agree with this exemption for relieving the suffering of injured wild mammals?

Suggested answer: **Unsure**

- There should be no need for an exemption as there is no justification for banning hunting and restricting the current use of dogs.
- No exemption that is supposed to be concerned with relieving suffering should include a limit of two dogs. Limiting the number of dogs that can be used risks extending the time before a wounded/injured animal is found and in many instances will mean they are never found.
- Requiring dispatch "other than by using a dog" excludes the method recognised as delivering the most rapid, certain death, risking prolonging rather than relieving suffering. In some cases it may be impossible to despatch the injured animal even if it can be located.
- The general prohibition on terrier work precludes the finding of injured animals gone to ground or orphaned animals. The 2023 Scottish legislation makes provision for these situations.
- In practice the exemption cannot be relied upon. Anyone relying on the exemption would still be liable under the offences created by the Bill.

Question 24. Should any additional conditions be included?

Suggested answer: **No**

- Existing conditions are already complex enough. The conditions prevent the relief of suffering in the quickest and most welfare positive way. They simply confirm that the Bill is more interested in judging and regulating human activity than ensuring the most humane management of wildlife according to best practice.
- The Bill will simply see increased numbers of wounded animals that are either never found or cannot be despatched in the most humane way possible, if at all.
- The Bill will only increase animal suffering which could be avoided. The Bill will cause unnecessary suffering, the legal definition of cruelty.

Question 25. Do you agree with this exemption to search for dead wild mammals?

Suggested answer: **Unsure**

- The exemption should be unnecessary as there is no justification for a ban on the traditional use of dogs in wildlife management.
- A dog searching open ground cannot reliably distinguish a carcass scent from a live animal's scent, risking unintended pursuit of live wildlife.
- The "reasonable steps" requirement is vague and open to inconsistent enforcement as in the other exemptions.
- In practice the exemption cannot be relied upon. Anyone relying on the exemption would still be liable under the offences created by the Bill.

Question 26. Are the conditions referred to in 23H (2) clear and appropriate?

Suggested answer: **No**

- The two-dog limit appears arbitrary for searching already deceased animals. There is no clear safety or welfare rationale.
- Terms like "under control" and "reasonable steps" remain open to interpretation as they do throughout the Bill.

Question 27. Do you agree with this exemption for training dogs?

Suggested answer: **Unsure**

- The exemption should be unnecessary as there is no justification for a ban on the traditional use of dogs in wildlife management.
- Scent training underpins the training of working dogs for legitimate everyday purposes - e.g. police dogs.
- Imposing restrictions on this activity, especially where no wild mammal is present, is neither reasonable nor justified.
- The exemption would not protect a person from prosecution under other offences in the Bill.

Question 28. Are the conditions attached to this exemption clear and appropriate?

Suggested answer: **Unsure**

- The exemption should be unnecessary as there is no justification for a ban on the traditional use of dogs in wildlife management.
- The exemption is copied from the Scottish legislation but fails to account of the very different construction of the offences in that Act.
- Conditions seem to replicate those in the other exemptions without regard to context e.g. a restriction on dogs forming a "pack of more than two" has no clear relevance to training.
- Applying the same catch-all conditions throughout the Bill does not produce clear, workable legislation.

Question 29. Do you consider the proposed enforcement powers to be appropriate?

Suggested answer: **No**

- Enforcement should be for the police and courts and not extended to wildlife inspectors.
- The penalties prescribed are disproportionate compared to the other offences under the 1985 Order.

Question 30. Do you foresee any operational challenges for enforcement authorities?

Suggested answer: **Yes**

- Vague, catch-all terms throughout the Bill will force officers into situational, ill-informed judgement calls rather than clear, consistent policing.
- Neither PSNI nor the courts have provided costings for enforcement, despite existing financial pressure on the justice system.
- The scope of the offences means that there is no clarity for the ordinary citizen as to what amounts to an offence and the police will face similar uncertainty.
- Criminal law should be clear. Undefined terms like "participation", "under control", "organising", "reasonable steps" and "induced" undermine that certainty.
- It is wrong to expect those with responsibility for enforcement and prosecution to have to determine on a subjective basis who to prosecute or not. Relying on the restraint of prosecuting authorities is contrary to the fundamental principles of good law. It also fails to account for private and vexatious prosecutions.

Question 31. Do you agree with the proposed review frequency of at least every five years?

Suggested answer: **No**

- If hunting is to be banned to advance animal welfare, then that welfare benefit should be clearly established before any legislation is passed.
- If legislation is passed, contrary to the evidence, then it should be monitored to show what it has, or has not, achieved in welfare terms.
- It will also be important to assess the impact of banning hunting and use of dogs on shooting, farming, conservation and wildlife and rural businesses and communities. Current evidence shows the impact would be entirely negative.
- Given the damaging impact of this proposed Bill on animal welfare, conservation, land management and species management an initial review should be undertaken within two years of commencement.

Question 32. Are there any specific factors that should be considered in any future review?

Suggested answer: **Yes**

- On the available evidence the Bill should not proceed.
- If this flawed Bill were passed then it will also be important to assess the impact on shooting, farming, conservation, wildlife, rural businesses and communities. Current evidence shows the impact would be entirely negative.

Question 33. Do you agree that the proposed commencement period (6 months after Royal Assent) is appropriate?

Suggested answer: **No**

- Six months is insufficient time for farmers, hunt members, dog owners, shooters and land managers to understand the new law, take legal advice, and adjust practices.
- The police will also need time to prepare for enforcement and the additional costs involved, especially given the lack of clarity throughout the Bill.
- Suggest a minimum commencement period of twelve months.

Question 34. Do you agree with the short title of the Bill?

Suggested answer: **No**

- The title does not honestly reflect the Bill's reach which extends well beyond hunting with dogs (e.g. to dog walkers and lawful shooting for food where a dog plays any part).
- This is not a Hunting with Dogs Bill but a dog control bill that threatens the future of all activities involving dogs and leaves vast numbers of people open to prosecution who have nothing to do with traditional hunts.

Question 35. Please provide any additional information or comments on any aspect of the Bill that you feel is relevant

- The Call for Evidence has adopted, seemingly without question, the Explanatory Notes to the Bill. Those responding to the Call for Evidence will naturally assume these notes are a true reflection of the impact and scope of the Bill's clauses when in fact they are erroneous or misleading on key points.
- This must also raise the concern that some will be responding to the questions on the basis of a false understanding of the Bill. Some, dog walkers etc, will be reassured that the Bill will not affect them when in fact it does.
- John Larkin KC's conclusions are clear about the risk to dog walkers, to lawful shooting for food, to deer stalking etc, as well as the problems with the Explanatory Notes. These concerns should be duly considered.
- No Rural Needs Impact Assessment has, to date, been published, despite the statutory duty under the Rural Needs Act (Northern Ireland) 2016.
- There is a serious question as to whether the Bill is compatible with the ECHR. As Mr Larkin KC notes: *"I consider that there are, at the very least, serious doubts about the compatibility of clauses 1, and 3 of the Bill with Article 7 ECHR and the compatibility of clauses 3 and 4 with Article 1 of the First Protocol ECHR"*. This also raises the question as to whether the Bill is in whole, or part, within the legislative competence of the Assembly under the Northern Ireland Act.