



Consultation on Proposals to Prohibit Trail Hunting in England and Wales

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Please find below my individual response to the consultation to oppose the trail hunting ban:

Q 7: Do you agree with this proposed definition of “trail hunting”?

Yes. As the government consultation document acknowledges, trail hunting is an activity that is “an alternative to hunting wild mammals” that has “grown in popularity” and does not involve wild mammals. Were it to do so then it would not be trail hunting, but an illegal activity that is already banned. To ban a lawful recreational activity enjoyed by thousands across the country in this way is unjust and draconian. This is ill-thought out and the damaging consequences will be felt across the country. If the government is to ban trail hunting, then the definition of trail hunting as the following of an animal-based scent trail with dogs (hounds) is consistent with that adopted elsewhere. Any other definition would risk banning or restricting activities such as drag and clean boot hunting, which the government has pledged will remain lawful. A ban on trail hunting is unnecessary and unjustified. A ban will have huge economic and social impacts, further damaging the rural economy.

Q 8: What types of conduct should be covered by ‘engagement’ or ‘participation’ in trail hunting?

The proposed ban is unnecessary and unjustified. However, if it is introduced, then engagement or participation should not cover mere presence. To do otherwise would lead to a chaotic approach across the countryside.

Q 9: In relation to offences or conduct which would assist unlawful trail hunting to take place, we intend that it should be an offence for the owner or occupier of land to knowingly cause or permit another person to engage or participate in trail hunting on that land. Do you agree?

No. The proposed ban is unnecessary and unjustified. New secondary offences risk widening the scope of the impact of the ban on other lawful activities in the countryside – such as equestrian sports, drag hunts or dog exercising. There are already plenty of common law offences available that would support the enforcement of a ban without the need to introduce controversial and complex new offences.

Q 10: In relation to offences or conduct which would assist unlawful trail hunting to take place, we intend that it should be an offence for the owner or

person responsible for a dog to knowingly cause or permit another person to use the dog for trail hunting. Do you agree?

No. The proposed ban is unnecessary and unjustified. New secondary offences risk widening the scope of the impact of the ban on other lawful activities in the countryside – such as equestrian sports, drag hunts or dog exercising. There are already plenty of common law offences available that would support the enforcement of a ban without the need to introduce controversial and complex new offences.

Q 11: Are there any other forms of conduct which should be considered as possible offences in relation to offences or conduct which would assist unlawful trail hunting to take place?

No. No comment.

Q 12: Do you consider that any other legislative changes are necessary to ensure that a ban on trail hunting is effective?

No. The creation of any new offence will simply increase pressure on the time and resources of already stretched local police forces.

Q 13: Do you think that it is possible for dogs to be appropriately trained for specific purposes other than trail hunting without the use of either animal based scents or artificial scents which mimic an animal based scent?

No. If a ban is introduced then there must be an exemption allowing the use of animal-based scents, or scents which mimic animal-based scents, to train dogs. The importance of allowing this has been recognised elsewhere and is essential for the training of gun dogs, the use of dogs in wildlife management, and the retrieval of injured or wounded animals, especially deer. It is therefore also important in terms of animal welfare. There is no viable alternative to the use of animal-based scents, or artificial scents which mimic animal-based scents, for training such dogs. The proposed ban is unnecessary and unjustified and there should be no need to consider exemptions. The economic and social impacts will be felt across every rural constituency and there must be consideration given to these impacts. Thousands of people, not just those who undertake trail hunting but those who rely on hunting for their way of life will be affected.

Q 14: Do you think that it should remain lawful, in certain circumstances, for animal based scents, or scents which mimic animal based scents, to be used in training dogs for certain purposes?

Yes. The ability to use animal-based scents, or scents which mimic animal-based scents, to train dogs is essential. The importance of allowing this has been recognised elsewhere and is essential for the training of gun dogs, the use of dogs in wildlife management, and the retrieval of injured or wounded animals, especially deer. It is therefore also important in terms of animal welfare. The proposed ban is unnecessary and unjustified and there should be no need to consider exemptions. The economic and social impacts will be felt across every rural constituency and there must be consideration given to these impacts on thousands of people, not just those who undertake trail hunting, but those who rely on hunting for their way of life will be affected.

Q 15: We understand that drag hunting is an equestrian sport where an artificial non-animal based scent trail, which does not mimic an animal based scent, is laid along a pre-determined route for hounds to follow. Do you agree that this is an accurate description of drag hunting?

Yes. The proposed ban is unnecessary and unjustified but if the government insists on a ban on trail hunting, then the definition above is an accurate description of drag hunting, with the exception that it is not exclusively an equestrian activity and is also conducted on foot.

Q 16: Do you think that there is a risk that dogs engaged in drag hunting will deviate from the pre-laid trail by the scent of a wild mammal and then pursue the wild mammal?

Do not know. The proposed ban is unnecessary and unjustified. Dogs (hounds) trained to hunt an animal-based or artificial scent will rarely deviate from the pre-laid line. As any dog owner will know, the possibility of dogs pursuing a wild mammal can never be wholly excluded but this is already covered under existing legislation.

Q 17: We understand 'clean boot' hunting is an activity where hounds hunt human runners who neither wear nor drag any form of artificial scent enhancement. Do you agree that this is an accurate description of 'clean boot' hunting?

Yes. No comment.

Q 18: Do you think there is a risk that dogs engaged in clean boot hunting will deviate from their pursuit of human runners to the pursuit of wild mammals?

Do not know. The proposed ban is unnecessary and unjustified. As any dog owner will know, the possibility of dogs pursuing a wild mammal can never be wholly excluded but this is already covered under existing legislation.

Q 19: Do you think that a new law to ban trail hunting would need to include any additional provisions in relation to drag hunting or clean boot hunting?

No. No comment.

Q 20: Are there any equestrian activities other than drag hunting, for example point to pointing, which you think are at risk from being affected by the proposed ban on trail hunting?

Yes. The proposed ban is unnecessary and unjustified. The consequences of banning an important recreational activity will be far-reaching, impacting communities, dogs (hounds) and horses, businesses and the well-being of individuals. Trail hunting is not just an equestrian activity and a ban would also impact foot packs. Horses are kept for multiple purposes but a ban on trail hunting will mean that many will give up horses and the wider impact on equestrian activities such as point to pointing, racing and team chasing will be huge. Put simply, without trail hunting, point to pointing will dwindle as hunts are no longer available to support.

This important facet of rural life will simply fade away. Evidence to date of this is already clear.

Q 21: How do you think the introduction of a ban on trail hunting will affect dogs used for trail hunting? For example, will they be able to be re-directed to other activities?

No. The proposed ban is unnecessary and unjustified. The impact on over 12,000 dogs (hounds) that have been trained to trail hunt cannot be overstated. Dogs (hounds) cannot just be re-purposed to some other activity. These dogs (hounds) are pack animals and are used to living and working together and would be hard to domesticate. By banning trail hunting there are few options to redirect hound activity which would meet the needs of those dogs. It is notable that the Animal Welfare Act 2006 states that the needs of an animal include “its need to be able to exhibit normal behaviour patterns” and “any need it has to be housed with, or apart from, other animals”. Any proposed legislation must take account of this and ensure that hound welfare is taken into consideration.

Q 22: Do you think that there should be a transition period following the introduction of a ban on trail hunting and if so, how long should that period be?

Do not know. The proposed ban is unnecessary and unjustified. There should be no need to consider any transition period. No amount of transition period would mitigate against the economic and social impact of this ban, nor would it avoid the consequences that may result for the over 12,000 hounds as a result of this government's unjustified proposal. However, if there is a ban, then it should not take effect in the middle of any trail hunting season and time must be allowed for hound re-training and transition, given the profound impact a ban will have on the future of hounds, horses, businesses and individuals. Police would also need time to reallocate resources, away from other priorities, to be in a position to enforce these proposals.

Q 23: Do you think that the proposed legislation to ban trail hunting in England and Wales will affect people and/or communities more widely?

Yes. Trail hunting is a lawful recreational activity enjoyed by thousands of people across the country. The hunts are an integral part of local communities and make an important contribution to the rural economy. The loss of trail hunting threatens an entire community and way of life. A Countryside Alliance survey has also found that 97% of hunting participants believe the activity benefits their physical and mental health. A ban on trail hunting therefore runs contrary to the government's policy to promote better physical and mental health.

Q 24: How do you think the proposed ban on trail hunting might affect the income and activities of the hunts currently involved in this activity?

A ban on trail hunting is unnecessary and unjustified. As the consultation document acknowledges, it is an activity that is “an alternative to hunting wild mammals” that has “grown in popularity” and does not involve wild mammals. The loss of trail hunting will have a profound impact on hunt numbers and may leave hunts

financially unviable. I would note again that this consultation fails to recognise that trail hunting is not just an equestrian activity but is also undertaken by foot packs. It is also attractive to those who follow, whether on foot or by car, and who enjoy watching hounds working.

Q 25: How do you think the proposed ban on trail hunting might affect the income and activities of businesses directly linked with hunts which currently engage in trail hunting?

Trail hunting sits at the heart of a web of businesses that supply the hunt and those that support and follow trail hunting. These include publicans, charities, farriers, saddlers, vets and feed merchants. For example, many farmers rely on hunts to collect fallen stock, which if trail hunting is banned, would see a significant increase in cost to those affected farmers at a time when they are facing rapidly increasing cost pressures. Thousands of charities also benefit from the support of the trail hunting community.

Q 26: Do you think that the proposed ban on trail hunting in England and Wales might affect other businesses not directly linked with hunts?

Yes. The British Hound Sports Association's recent socio-economic survey found that hunting contributes £100m to the rural economy each year. In addition to businesses directly associated with the care of dogs (hounds) and horses by hunts and those engaged in trail hunting, there is a wider economic contribution. A ban on trail hunting would financially impact farmers who rely on the fallen stock service provided by hunts. It would also impact local hospitality businesses, livery yards that care for hunt horses or hire horses for trail hunting, plus ancillary businesses including electricians, plumbers and builders.

Q 27: How do you think that the proposed ban on trail hunting could affect the environment or wildlife?

Unless dogs can be trained using animal-based scents, or those which mimic animal-based scents, then it will become impossible to train dogs used for shooting, for following up injured or wounded animals, especially deer, and those used in environmental species management and wider land management. There would be serious implications for animal welfare, biodiversity and nature recovery. The hunting community plays a proactive part in the stewardship of the countryside and this ban puts at risk that organised volunteer activity.

Q 28: Are there any other matters, including possible alternatives to primary legislation, which you feel should be taken into account in developing the legislation to ban trail hunting?

Do not know. No comment.

Q 29: Is there any other evidence you would like us to consider?

A ban on trail hunting is unnecessary and unjustified. Trail hunting does not involve wild mammals as an activity. If it were to do so, then it would not be trail hunting but unlawful hunting under the Hunting Act 2004 and can be prosecuted as such.

The Hunting Act was the result of 700 hours of debate and was what hunting opponents wanted. Hunts adapted and adopted trail hunting, which is what the supporters of the ban on traditional hunting said they should do. There have been thousands of days of lawful hunting activity since the Hunting Act was enforced and only a handful of convictions of registered hunts. The government should think again and recognise that there is no case to ban trail hunting and to cause such unnecessary socio-economic harm to communities across England and Wales cannot be justified. This would undermine its own objectives of economic growth and healthy, sustainable communities. This is yet another assault on the rural way of life.