

AVA Submission:

Animal Welfare Codes of Practice - Breeding Dogs and Cats, and Animals in Pet Shops

To the Department of Primary Industries

Submission from the Australian Veterinary Association Ltd



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Prevention of cruelty to animals (breeding dogs and cats and animals in pet shops) standards and guidelines

Submission from the Australian Veterinary Association Limited

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About us

The Australian Veterinary Association is the national organisation representing veterinarians in Australia. Our 9000 members come from all fields within the veterinary profession. Clinical practitioners work with companion animals, horses, farm animals, such as cattle and sheep, and wildlife. Government veterinarians work with our animal health, public health and quarantine systems while other members work in industry for pharmaceutical and other commercial enterprises. We have members who work in research and teaching in a range of scientific disciplines. Veterinary students are also members of the Association.

Executive summary

The AVA's NSW Division has reviewed the discussion papers relating to the draft Standards and Guidelines - Breeding Dogs and Cats, and Animals in Pet Shops, and has provided the following feedback according to the question feedback form.

We thank the department for giving us the opportunity to provide comment into this process.

Recommendations

Discussion paper on draft Prevention of Cruelty to Animals (Breeding Dogs and Cats) Standards and Guidelines.

1. Definitions

Disease agent: suggest change “and” to “or” and add “capable of causing disease.”

6. Required numbers of staff

Standard Part 2, Section 6 states that during all hours of operation of a facility, the person in charge should ensure a minimum of one staff member per twenty animals with a mother and litter being considered the equivalent of two animals. The staff member duties are to feed and clean the housing and to provide social interaction and enrichment for the animals. The AVA is of the opinion that this ratio may not be appropriate for a dog and/or cat breeding facility.

There is no interpretation in the Standard as to when a mother and litter is no longer considered two animals and can be classified as individual animals. Hypothetically 20 animals in a breeding establishment may equate to 10 breeding units. The workload required to care, feed and clean in addition to providing social interaction and enrichment would be greater for a breeding unit than for 2 individual animals, especially as the young animals grow and become more active and independent of their mother for feeding.

Puppies up to 5 weeks of age have greater dependence on their mother for nutrition and interaction. Puppies older than this age can feed independently, are more inquisitive and boisterous and there is an increased cleaning requirement for housing, water and feed utensils. The mother will leave the pups for longer periods at this time and she should be allowed to express this behaviour in a breeding establishment and not kept constantly confined with the puppies.

The AVA considers that a mother and litter of puppies less than 5 weeks of age equate to two animals. Puppies 5 weeks of age and older should be considered individual animals for the calculation of staffing requirements.

7. Staff training register

Standards states “the person in charge of the facility must ensure that each staff member is provided with regular opportunities to up-date their qualifications and experience” – we believe that the timing of this continuing professional development (CPD) should be clarified, as “regular” is not adequately specific. We suggest biannual or triannual sessions with minimum hours specified, e.g. 7 hours at each session.

8. Directory of information about dog and cat systems

We suggest that information identifying animals, when they were fed and toileted, and when the cage was cleaned should be clearly visible on the cage.

The requirement for data entry is significant, therefore we suggest provision of compliant software.

12. Writing operating procedures

We suggest that there is the opportunity for establishments to have some guidance in drafting SOPs, for example availability of sample SOPs, support in writing these or a review system.

16. Temperature of dog and cat housing

This states that dogs and cats should be protected from extremes of temperature, but the stated range may be dangerous to some animals; for example brachycephalic dogs may be at severe risk of brachycephalic obstructive airway syndrome in temperatures within this range, e.g. 30 degrees.

Brachycephalic breeds should be listed in the definitions so there is no confusion. They may be treated like “very old and very young animals which are more sensitive to others”. Please provide a definition of what constitutes very old and very young.

Being a breeding establishment, it would be expected that many of the animals would be very young with impaired temperature regulation because of their level of physical maturity. The temperature humidity index would have greater impact than temperature alone. If the standards are adhered to, there shouldn't be very old animals as part of this trade.

Dog and cat treatment room

It is clear at the end of this section that the treatment/isolation room can be located at the veterinary hospital, but it could be clearer at the beginning.

21. Suggest change to “take animals from the facility of having an infectious disease” to “for” or “with” an infectious disease.
29. General standards of care for dogs and cats

Standards state that animals should have at least 5 minutes of direct handling, please reword to “at least five minutes of positive handling”.

Need to have an interpretation for ‘positive handling’.

30. Food and water requirements

We support the maximum interval of 12 hours between feeds.

33. Monitoring health status of dogs and cats

Suggest add frequency, e.g. if a dog or cat is not eating/urinating/defecating/drinking at least once per day.

34. Arrangements with a veterinary practitioner

Suggest reword “Standards: the person in charge of a facility must ensure veterinary services must be available at all times” to “must ensure veterinary services are available a t all times”.

35. Veterinary treatment of dogs and cats

Suggest modify:

- b) – or signs of “cat flu”
- f) or if diarrhoea persists for >48 hours
- w) wounds, including bite wounds

37. Control of parasites

We support the requirement that “pest control programs for a facility must be managed separately to programs that prevent and control internal and external parasites in animals.”

38. Isolation of infectious dogs and cats

Our concern is that while a veterinary practitioner may give “written assurance that it is appropriate to house dogs and cats with other dogs and cats”, no guarantees can be given. This exposes veterinarians to liability.

This is an issue with pounds and boarding establishments where behaviourally it is not appropriate to house a dog with another dog or with a cat. In some cases, it can be appropriate. This needs a behavioural assessment of the animals to determine what is appropriate.

39. Requirements for dogs and cats to be sold

Standards require that an animal has had at least one veterinary practitioner exam, we suggest that written evidence is provided of such an exam.

41. Considerations for conditions at proposed new home

We suggest that it will be very difficult for staff to establish the capacity of an owner to care for an animal, and further guidance may be required.

42. Information and advice to new owners

We suggest that sample information is developed that can be adapted by establishments so that owners are given consistent and quality information. Organisations such as the ANKC, RSPCA and Cat Protection Society could develop this information.

Independently developed advice important since in house advice may constitute ‘folklore’ and not scientific fact. Reference to advice from specific reputable organisations such as Dogs NSW, RSPCA,

etc. is important.

52. Who may perform humane destruction

The AVA is of the opinion that humane destruction of a dog or cat in a breeding facility or in a pet shop must only be performed by a registered veterinarian, and that the appropriate method is by intravenous administration of barbiturate solution. Euthanasia is a technical skill and can cause immense suffering if performed incorrectly, incompletely or incompetently.

There is concern regarding the phrase 'except in emergency situations' and we would query why such situations would arise in a facility which must have an association with a veterinarian. The requirement that, if a veterinarian cannot attend, a veterinarian be contacted to instruct a person in the euthanasia of the animal, infers that intravenous barbiturate will not be used and another possibly less humane method would be used. We have significant concerns if the operator is not adequately trained in the method, for example the use of a firearm.

Under the NSW *Poisons and Therapeutic Goods* legislation, barbiturate euthanasia solution is restricted to use by veterinarians or authorized persons (employees of local government or specified animal welfare organisations). This does not include breeding facilities and pet shops of course.

We submit that the person in charge of the breeding facility should consult with their veterinarian to devise an emergency plan if an 'emergency situation' should arise and the specified veterinarian cannot attend. This could include the attendance of an alternative veterinarian, or supervised directions for palliative care until a veterinarian can attend. The opportunity for the creation of a 'loophole' that can be exploited by persons wishing to avoid the expense of veterinary consultation must not occur, as the use of alternative methods of euthanasia by lay personnel could result in very poor animal welfare outcomes.

Discussion paper on draft Prevention of Cruelty to Animals (Animals in Pet Shops) Standards and Guidelines.

6. Required numbers of staff

Standard Part 2, Section 6 states that during all hours of operation of a pet shop facility, the person in charge should ensure a minimum of one staff member per twenty animals (dogs and cats) with a mother and litter being considered the equivalent of two animals.

The main intent of a pet shop is to trade dog and cats - not to conduct breeding or rear young animals. The hours of operation would be insufficient to result in acceptable animal welfare for both activities.

The AVA recommends that only individual animals be exhibited in pet shops, that is dogs and cats that are truly independent of their mother and are aged 8 weeks or older. Therefore, the proviso that a mother and litter be considered the equivalent of two animals should be removed. It should be clarified that it is not appropriate to keep nursing mothers and dependent young in pet shops.

With regard to staffing required for other animals held in pet shops for sale, the AVA believes that there should be an average time calculated for the care of rabbits, guinea pigs, rats, mice, birds, fish and reptiles. The AVA can assist with provision of this information if required, through our Unusual Pet and Avian Veterinarian (UPAV) special interest group.

7. Staff training register

We believe that a minimum number of required training hours should be stipulated to provide consistency.

19. Isolation facilities

We strongly support standards requiring persons to take animals suspected of having an infectious

disease to a veterinarian. We would add that animals showing signs of illness should be taken off display.

21. Special animal housing requirements

Housing should be predator and escape proof.

Reptiles are subject to thermal burns. A species-appropriate thermal gradient should be provided in reptile housing.

25. General standards for the care of animals

We strongly support the addition of appendices for the care of rabbits, guinea pigs, rats, mice, birds, fish and reptiles, as these species have very different husbandry requirements to dogs and cats. The Australian Veterinary Association can assist with this information if required, through our Unusual Pet and Avian Veterinarian (UPAV) special interest group.

26. Food and water requirements

We support the maximum interval of 12 hours between feeds.

27. Cleanliness and hygiene requirements

Whilst we believe that most enclosures should be cleaned daily, there are species exceptions. For example, daily cleaning may be very disruptive to rats and mice.

We suggest that handling of animals is conditional on washing of hands; thus members of the public may only handle animals if they wash their hands before and after handling, to reduce the risk of transferring infectious disease to animals, and to reduce the risks of zoonotic disease. Handling animals may also cause stress to the animals, and this should be minimized and species-appropriate.

30. Arrangements with a veterinary practitioner

In the discussion paper this sentence appears incomplete. It states that "It is important that the person in charge has procedures" but does not specify for what. We presume it would continue "for determining when veterinary intervention is required"?

31. Veterinary treatment of animals

The standard currently reads that, when a severe illness or death occurs, "veterinary treatment or advice must be sought as necessary." We believe that severe illness or death necessitates investigation, thus we suggest that when a severe illness or death occurs, "appropriate veterinary treatment must always be sought".

40. Special requirements for rabbits, rats, mice and guinea pigs

Discarding rat and mouse bedding daily may cause stress. We suggest this is amended in discussion with the AVA's UPAV special interest group.

42. Special requirements for birds

c) we suggest change the term "specialised knowledge" to "experienced".

45. Method of humane destruction

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situations would arise in a facility which must have an association with a veterinarian. The requirement that, if a veterinarian cannot attend, a veterinarian be contacted to instruct a person in the euthanasia of the animal, infers that intravenous barbiturate will not be used and another possibly less humane method would be used. We have significant concerns if the operator is not adequately trained in the method, for example the use of a firearm.

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47. Humane destruction recommended by a veterinary practitioner

We are concerned about the use of the word "impractical" here, as it implies that non-veterinarians can euthanase animals if treatment is "impractical" – which may be because it costs money, is inconvenient, the store is about to close, or other trivial or unjustified reasons. We suggest removal of clause 47 and also argue that only veterinarians should perform euthanasia for animal welfare reasons (see above).