

Public Workshop for Proposed Animal Care Standards

General Standards Workshop Minutes

February 16, 2012, 3:30 – 5 PM

Scope of Workshop:

The purpose of the workshop was to discuss the general animal care standards for all animals and to address pets other than dogs or birds. The first draft of the standards does not contain specific rules about other pet species. The goal of this meeting was to answer questions and hear public comments on the general care standards and in particular how they might apply to pets other than dogs and birds. A draft of the general care section is at the end of these minutes. Comments or questions were from participants unless noted as DEC responses. Five people participated with the DEC staff, Moderator David Lowell, State Veterinarian Dr Robert Gerlach, and Assistant state Veterinarian Dr Jay Fuller.

1. Introductions, ground rules, and scope of workshop.
2. Questions and comments were taken on each section of the general care standards. The general standards draft can be viewed at the end of these minutes.
 - (a) - Seems very appropriate for the intent.
 - (b) - No body condition scoring system chart has been found for cats as has been proposed for dogs.
 - University of California at Davis may have such a chart and Tufts University has published one for dogs.
DEC Comment: We will review the Tuft's chart for possible use. (OPEN)
 - Regarding the physiologic state of animals, do any charts address hydration?
DEC Comment: No, just overall weight and body condition. Hydration is assessed by the veterinarian during physical examination using skin turgor, sunken eyeballs, lethargy, dry mucous membranes, and capillary refill time.
 - The standards seem pretty ordinary and understandable. Are the standards meant to increase food animal production or to ensure humane care?
DEC Comment: The purpose of the standards is to ensure humane care. Routine accepted animal husbandry practices are not prohibited.
 - (c) - Rabbits or other livestock may be judged differently by different veterinarians. What about having a specialized person to assess specific types of animals?
DEC Comment: State Law requires only that a "licensed veterinarian" render a professional opinion on whether an animal is being properly cared for. We recognize that some vets may have more or less experience with certain species of animals. Veterinarians who have testified in previous meetings have all stated that they felt competent to apply the basic principles drafted in these proposed regulations. No veterinarian would be forced to consult on a case if they did not want to do so. One primary goal of the standards is to clarify some areas of animal

care with more objective criteria where possible, but also to allow professional judgment where more appropriate. Within the veterinary profession, there are formal specialty boards, such as surgery, ophthalmology, internal medicine, etc, but they do not exist for specific animal species. Veterinarians are all trained in medicine for all major species.

- What about people feeding the wrong type of food, i.e. dog food to cats, table scraps only to cats, etc?

- Wrong food might be difficult to categorize. Also consider spoiled food, unpalatable food, non-food items.

- Animal Control Veterinarian: Based on court experience, if a rule gets too complicated it becomes easier for defense lawyers to refute by "poking holes in it".

- We should also consider spoiled, infested, and other types of "bad" food.

- A general statement that is not too specific might be a good approach.

DEC Comment: We will research other state regs for possible approaches to "non-useful" food. It could become cumbersome and possibly counterproductive to try and overly define "wrong" food. Poor health and/or body condition can be used as evidence of non-useful food.

(d) – Like the clause.

(e) – What constitutes humane euthanasia?

DEC Comment: The draft regulations reference the American Veterinary Medical Association guidelines for humane euthanasia. These guidelines address most types of animals, with accepted methods for each species.

(f) – How will transport be addressed? What about need for hydration, etc?

- Another participant also shares that concern.

- Veterinarian: We need a temperature reference for housing and transport. Title 17 (Federal Code) has some very general verbiage about being detrimental to an animal's health. Being exposed to feces/urine for a long time may not cause obvious skin disease.

- Regarding using ammonia levels as a measure of unsanitary conditions, ammonia testing and ventilation:

-- Courts (defense attorneys) tend to raise questions about the competency of the person reading the equipment. Many small pocket pets in one spot may be living in a very high ammonia level atmosphere but the ammonia meter may not show that very well. There are pros and cons to using high ammonia level readings in court. When using objectionable odor as evidence of an unhealthy or unsafe environment for pets, in really serious cases, personnel must don respirators and protective clothing to enter a premise. They then cannot truly comment on the level of the bad smell in a place.

-- An objective measurement of ammonia would seem better than a subjective description, although ammonia is certainly very offensive.

DEC Comment: We will research possible inclusion of ammonia levels measurements. Some states do use this standard for various types of animals. It would not be practical to make high ammonia levels as measured the only standard for objectionable odor, if we include some clause on odor. We will also consider possible verbiage on transportation with regard to ventilation and temperature. These issues are addressed by other states as well.

(g) --Would this section apply to all species?

DEC Comment: Yes.

3. Open forum: No further comments

Excerpts from current draft of general standards (applies to all animals):

18 AAC 36.560. General care standards. (a) All animals must have daily access to water in sufficient quantity and quality to satisfy the animal's physiologic needs as evidenced by the animal's hydration status.

(b) Animals with body conditions lower than standards may be permitted for a reasonable period of time if stage or level of production, physiologic conditions, or other factors result in such an appearance, during which time the animal's management is being altered to improve the condition. For purposes of assessing body condition, "a reasonable period of time" means the amount of time it would be expected to take to restore an animal to an acceptable condition, using diligent efforts to do so.

(c) All animals must have adequate feed to maintain a healthy body condition as determined by a veterinarian licensed under AS 08.98 or peace officer in consultation with such a veterinarian. No animals should be deprived of feed or water for over 24 consecutive hours, except:

(1) Animals being transported may not be deprived of feed/water for over 28 consecutive hours.

(d) Sick or injured animals shall be promptly treated utilizing available medical care or humanely euthanized.

(e) When necessary, euthanasia must be administered in a humane manner that conforms to the American Veterinary Medical Association guidelines. A copy of these guidelines may be obtained from the OSV or online at http://www.avma.org/issues/animal_welfare/euthanasia.pdf. In cases where gunshot is the only practical euthanasia method to prevent possible human exposure to rabies, and it is necessary to preserve the brain for laboratory testing, the gunshot may be to the heart area rather than the head.

DEC Note: To allow for full exploration of this topic, we plan to address humane euthanasia as a separate agenda item at a future meeting. During this meeting we can allot 10 minutes maximum, unless there is time at the end of the meeting for more comments or questions.

(f) Animals must be transported or housed in an area with adequate drainage and sanitation to prevent excessive build up of feces, urine, or water. "Excessive" is defined as adequate to cause visible skin or hoof disease.

DEC Note: This clause has been discussed at both previous dog meetings. There are several possible approaches to sanitation, with the endpoint of skin disease being one possibility. Such endpoint measured limits may not act as a preventive and, of course, require that the animal be adversely affected before anything can be done to improve its health and safety. Identification of skin disease can be difficult for the layperson or anybody from a distance due to hair coats. Other possible approaches to sanitation include statements about the percentage of useable clean space that the animal has or simply requiring that it be able to escape its own excrement within its living space. Living space minimums have also been discussed and they are necessarily linked to sanitation. Other states approach this problem in many ways, with living space minimums, daily cleaning requirements for caged dogs, or general statements. Without any further definition by these standards, Alaska Law leaves the determination of healthy environment completely up to the veterinarian who is consulted. This would normally be the animal control veterinarian or the Office of the State Veterinarian.

(g) Nothing in these rules shall prohibit owners from providing medical care and treatment to their own animals provided it is performed in a sanitary manner, in such a way as to minimize pain, and in compliance with all local, state, and federal laws.