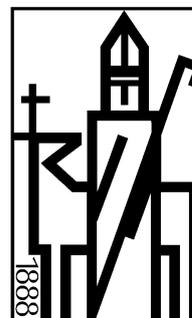


# Den norske veterinærforening



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J.nr. 1054/14/EB/Ark.nr. 0.114/Oslo 12.12.2014

## **Høring: Forslag til ny forskrift om ikke-kommersiell forflytning av kjæledyr og endring og oppheving av forskrifter som omfatter inn-og utførsel av dyr, sæd, egg og embryoer**

Den norske veterinærforening (DNV) har fått ovennevnte høring til uttalelse.

DNV er oppmerksom på at høringen dreier seg om implementering av rettsakter i forhold til forpliktelsene etter EØS-avtalen, og at forslag til materiellmessige endringer ikke vil bli vurdert i denne omgang.

Norge har en svært god helsesituasjon når det gjelder kjæledyr sammenlignet med store deler av resten av Europa. Innførsel av kjæledyr har vært økende til Norge de siste årene, både når det gjelder ordinær innførsel av egne dyr og eierløse dyr som importeres fra diverse "shelters" av dyrevernhensyn, samtidig med at ulovlig handel med kjæledyr fra andre land også er relativt omfattende. DNV mener derfor at norske myndigheter bør arbeide for å få særskilte bestemmelser om strengere regler for innførsel enn det som gjenspeiles i det generelle EU regelverket.

Konkrete forslag vil være å kunne kreve særskilte tilleggsgarantier for import av hunder fra land med endemiske sykdommer som vi ikke har i Norge, slik ordningen er når det gjelder produksjonsdyr. Foreløpig dreier det seg om Rabies og Echinococcus Granulosus, men listen bør relativt enkelt kunne utvides på bakgrunn av kartlegging her i landet.

Norske myndigheter bør også arbeide for at opprinnelige eierløse dyr (for eksempel løshunder) i utgangspunktet kan nektes innført.

Til slutt bør Norske myndigheter arbeide aktivt for at det opprettes et system med en felles tilgang til alle databaser over merkede og registrerte hunder i EU-landene, slik at det blir enkelt å sjekke identitet.

Vedlagt denne høringsuttalelsen følger til orientering et utkast til "position paper" fra FECAVA og FVE med DNVs kommentarer til dokumentet.

Med hilsen

A handwritten signature in black ink, appearing to read 'Ellef Blakstad'.

Ellef Blakstad  
Fagsjef, Den norske veterinærforening

1 vedlegg

# FECAVA - position paper

## FECAVA and FVE position paper on stray dogs in Europe - 2014

The presence of stray dogs<sup>1</sup> in large numbers is a reality in many European cities. Roaming animals in the streets pose serious risks for animal health and welfare, as well as for public health and welfare. The social, economic and political consequences of this phenomenon can only be tackled through the effective management of the stray dog population.

Currently there is no common European legislative framework to address this issue. It is the responsibility of each Member State of the European Union to put in place appropriate legislation with respect to stray animal prevention and the management of existing stray populations. Additionally, the level of enforcement of any legal requirements differs significantly from country to country.

The veterinarian has a key role in ensuring animal health, animal welfare and the prevention of zoonotic diseases. FECAVA and FVE are of the opinion that the long-term control of stray dog populations requires a combined approach, aiming both at preventing new stray animals and the effective management of existing populations. However a humane, long-term and integrated plan requires the collaborative effort of many stakeholders and the authorities.

### Why stray dogs must be controlled?

The risks for the health and welfare of the abandoned animals on the streets are easy to comprehend.

Nevertheless, homeless straying animals directly or indirectly compromise the health and welfare of humans and other domestic animals. They act as a source of many pathogenic and zoonotic agents, such as rabies, echinococcus, leishmania, giardia, toxoplasma, etc. and their bites can be particularly harmful, resulting in human injuries and occasional deaths, as well as exposure to potentially dangerous zoonotic infections. Stray animals are also commonly involved in or cause road traffic accidents.

### Integrated approach:

An integrated approach aimed at controlling stray dogs in a country should include a combination of some or all of the following strategies.

#### 1. Education on Responsible Ownership:

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<sup>1</sup> Stray dog: There is no statutory definition of a stray dog. However, any dog found in a public or private place, or where it should not be, which appears to be without its owner and is not under the control of its owner or a person representing them, may be considered as stray. The term encompasses various free-ranging loose categories including wild dogs, street dogs, village dogs, as well as dogs allowed to come and go freely by their owners.

45 Preventive measures to avoid new animals becoming homeless are  
46 indispensable. Responsible Ownership aims at maintaining a good level of  
47 animal health and welfare, to maximize physical and psychological benefits for  
48 humans and to minimize the potential risk that pets may pose to the public,  
49 other animals, or the environment<sup>2</sup>.

51 Responsible Ownership must be encouraged by education, incentives and/or  
52 legislation. It has to be addressed in national and European legislation  
53 together with the regulation of the breeding and trade of companion animals -  
54 including Internet trade. Harmonisation within the EU and close collaboration  
55 of the Member State Authorities could be very helpful in restricting stray  
56 animals in a country.

58 Education of the public - both children and adults - about responsible  
59 ownership is the cornerstone. Responsible ownership campaigns should  
60 become an integral part of primary education, establishing a long-term solution  
61 to the problem, where ideally no shelters are needed and all companion  
62 animals are looked after by a caring owner.

64 2. Mandatory permanent identification and mandatory registration

65 Mandatory permanent identification and mandatory registration of all dogs in  
66 Europe is essential when it comes to control of the dog population. There is a  
67 need for a central database or to improve the sharing of information between  
68 the existing registration databases. At the present time, FECAVA and FVE feel  
69 that identification of animals using transponders offers the most advantages  
70 for a pan-European system and is the method of choice.

72 3. Ensure health status of homeless animals

73 Vaccination against rabies and other important diseases, as well as  
74 antiparasitic treatment of all animals, mainly against echinococcus, should be  
75 ensured; this is integral part of the responsible ownership principles. When it  
76 comes to stray animals, authorities should also guarantee the health of the  
77 public and other domestic animals through the implementation of appropriate  
78 health plans, which include, at least, basic vaccination.

80 4. Ensure minimum quality standards for shelters

81 Shelters should meet at least minimum standards (see Shelter Quality) and  
82 have a contract with a veterinary practitioner to provide regular care to the  
83 shelter animals. All shelters should be registered and inspected on a regular  
84 basis by the competent authority. All dogs and cats entering shelters should  
85 receive a health visit, ensuring they have a transponder implanted, are  
86 sterilised and vaccinated against rabies and other important diseases.

88 In cases where the health and welfare of both humans and other domestic  
89 animals can be severely compromised, euthanasia should be considered. This  
90 measure should be applied as required by the law, i.e. in case of severe  
91 zoonotic risk or other risks, like rabies, aggression, etc. or in cases of very  
92 poor health status making the animal unable to acquire, utilise and meet it's

deleted: could

<sup>2</sup> CALLISTO Strategy Report II Cycle:

[http://www.callistoproject.eu/joomla/attachments/callisto\\_strategy\\_report\\_II\\_cycle.pdf](http://www.callistoproject.eu/joomla/attachments/callisto_strategy_report_II_cycle.pdf)

94 | own daily requirements for nutrition and therefore, do not have a minimum  
95 | quality of life. Euthanasia should be performed by a veterinary surgeon in a  
96 | humane way and in line with the OIE guidelines.

S1ettet: not allowing

S1ettet: the animal to

98 | 5. Adoption

99 | Adoption within a country should be facilitated and promoted. Cross border  
100 | adoption should be avoided due to the concerns of zoonotic disease control  
101 | and the spread of other infectious and/or parasitic diseases.

S1ettet: could be considered,  
but

S1ettet: preferably

S1ettet: as a long term tool

103 | 6. Catch, neuter, vaccinate and release

104 | Catch, neuter, vaccinate and release should be considered in the initial stages  
105 | of a dog population management program or where shelter capacity for all  
106 | stray animals is limited. The fact that the dogs are back on the street after their  
107 | 'treatment' is not ideal. However, since reproduction stops immediately, over  
108 | time it will result in a huge reduction in stray animal numbers, if there is no  
109 | significant movement of strays from other areas.

S1ettet: However in cases where cross border rehoming is considered, it should be practised solely under veterinary supervision with full compliance to the Pet Passport scheme where applicable. The Competent Authorities in both jurisdictions should be consulted and their agreement sought before any cross-border rehoming occurs. All sides should undertake a risk analysis on the zoonotic and animal health implications before any cross-border rehoming.

110 | The animals should be caught in a humane way by trained professionals.  
111 | Veterinary surgeons - aware of their high ethical principles and  
112 | professional duties- should examine, vaccinate and neuter the animals  
113 | with minimal stress and by using proper anaesthesia and analgesia. The  
114 | animals should only be released when sufficiently recovered from the  
115 | procedure.

118 | If the animals health and welfare conditions cannot secure acceptable quality  
119 | of further life, they should be euthanized by a veterinary surgeon.

123 | Stray dogs in large numbers are a reality in many European countries. To address  
124 | stray dog populations, an integrated approach aiming at long-term population control  
125 | in Europe can only be successful through a common European legislative framework.

127 | Therefore, FECAVA and FVE consider it necessary that:

- 129 | • The European Commission, supported by the European Parliament and all  
130 | Member States put forward a Community Animal Welfare Law which includes  
131 | companion animal welfare issues
- 133 | • The European Commission, the European Parliament and all Member States  
134 | agree upon a common EU stray dog policy together with regulation for the  
135 | breeding and trade of companion animals - including Internet trade.
- 137 | • all Member States introduce mandatory Identification & Registration for dogs  
138 | from 2018.

142 | **References:**

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