

# DOGS NEW ZEALAND

Proposed Animal Welfare Regulations  
on Significant Surgical Procedures  
Submission 24 July 2019



## **Proposed animal welfare regulations on significant surgical procedures**

### **Submission by Dogs New Zealand**

*The Ministry for Primary Industries (MPI) is seeking feedback about proposed regulations on significant surgical procedures on animals (Proposed Animal Welfare Regulations: Significant surgical procedures. MPI Discussion paper No: 2019/01).*

Dogs NZ thanks MPI for the opportunity to comment and appreciate the time that was put aside to speak with Canine Health & Welfare Chair and Officer of DOGS NZ

Dogs NZ was established in 1886 originally under the name of the New Zealand Kennel Club. It maintains a database which traces the genealogy and pedigree of New Zealand Dogs as well as progression of sports associated with Canine which include breed clubs, obedience, agility, working trials, Black Hawk canine good citizen™ New Zealand young kennel club to name just a few. Dogs NZ has a strong focus on canine health and welfare enacted by its Canine Health & Welfare Committee, Officer and Assistant. Dogs NZ has over 300 societies affiliated to the organisation and works closely with many external stakeholders whilst maintaining the biggest membership base of dog breeders and owners in New Zealand.

Dogs NZ would like to comment on the following sections of the Proposed Regulations.

#### **18. All animals – freeze branding**

Dogs NZ does not support the proposal as written.

Dogs NZ has the opinion that this is an unnecessary procedure which does not confer any welfare benefit to the dog and has the potential to cause significant pain and distress if done without pain relief and sedation.

There are many other suitable immediate identification methods available including microchips, electronic GPS, collars, vests and noting colouring and markings of individual dogs.

If the procedure is to be continued, then it should be done with pain relief and under anaesthesia to reduce the animal welfare compromise.

#### **20. All animals – surgical reproductive procedures**

Dogs NZ supports the proposal in principle.

Surgical artificial insemination by laparotomy (surgical incision into the abdominal cavity) is commonly performed on dogs by veterinarians in New Zealand. This is always done by a veterinarian under general anaesthetic and with pain relief and there are no exceptions to this.

The use of imported frozen semen is, considering New Zealand's geographic isolation, extremely important to increase genetic material and improve genetic traits of dogs. It is costly and difficult to

import live dogs to New Zealand due to our location and strict biosecurity requirements. Frozen semen makes it possible to introduce superior genetics into our breeds.

Dogs NZ is very concerned that the VCNZ and NZVA will restrict or prohibit this procedure deeming it cosmetic or unnecessary to the individual bitch and therefore not allow veterinarians to perform it. Our members have experienced this recently with what has effectively become a ban on the removal of front and articulated hind dew claws when it was deemed a procedure that was veterinarian only but still allowed to be done for any purpose. The Veterinary Council and NZ Veterinary Association have subsequently instructed its members that removal of a digit unless already diseased or injured will be a breach of the Code of Professional Conduct (COP). Dogs NZ is rightly concerned about the need for careful wording to protect this procedure which has become critical for genetic diversity and the health of our breeds.

The alternative method for intra-uterine insemination (trans-cervical) is not widely available in NZ. Additionally, there are situations where the technique is unable to be performed due to anatomic difficulties in the bitch and other various breed anomalies. In these situations, surgical AI is the only viable option for the use of frozen-thawed semen. Hollinshead 2017, showed that over a study period, in 7 bitches ( 4 Golden Retriever and 3 Bernese Mountain Dogs) it was not possible to catheterise the os cervix and those bitches had to be then surgically inseminated .

The viability of frozen-thawed semen is approximately 12-24 hours verses approximately 5 days for fresh semen which means that if intra-vaginal insemination was performed it would not survive the time taken to reach the fertile eggs. Fosberg 1999 and Fontbonne 1993 have showed that vaginal insemination of frozen semen has an extremely poor success rate.

Dogs NZ strongly believes that the continued use of surgical AI is critical to the health and welfare of pedigree dogs in New Zealand and needs to be protected to enable the options available to both the breeder and their veterinarian.

### **34. Dogs – prohibit ear cropping**

Dogs NZ supports this proposal.

## **Appendix 5 – Procedures for which no regulations are proposed at this time**

### **I. All animals – inserting drains.**

Dogs NZ agrees that insertion of drains meets criteria of a SSP and due to its nature should be a veterinary-only procedure and does not require regulation.

### **II. All animals - abscesses**

Dogs NZ agrees that the variety of abscesses makes regulation extremely difficult. Treatment of abscesses should be done by, or with guidance from a veterinarian.

### **IV. All animals – stitching up wounds**

Dogs NZ agrees that regulation is not required as it meets the criteria of a SSP and offenses can be dealt with under the Act.

### **V. All animals – non-surgical reproductive procedures**

Dogs NZ does not agree with taking trans-cervical insemination of dogs off the list of regulations for consideration.

Dogs NZ view trans-cervical insemination (TCI) as meeting criteria of an SSP and believe that there should be regulation enabling a competent person to perform the technique. Veterinary technicians commonly perform TCI overseas.

Dogs NZ strongly wishes to keep the use of frozen semen an option for dog breeders in New Zealand. By allowing a competent person to perform this then should the veterinary profession ever deem the procedure against their COP, the option will still be available to breeders by using a competent person.

TCI was first described by Wilson in 1993. TCI can be learnt with persistence and care however it is a technique where care must be taken to maximise results and minimise risk of harm to the bitch. TCI results in semen deposition into the uterus by advancing the rigid endoscope through the vagina up to the cervical os, a catheter is then advanced through the cervical os and semen is deposited directly into the uterus.

The TCI procedure is typically done with the bitch standing and restrained on a table. The bitch normally tolerates the procedure well, only occasionally requiring sedation (Hollinshead 2017). A rigid endoscope (figure 1) is introduced at a steep angle to the vulva then raised to a horizontal plane once over the pelvic rim. Several anatomic landmarks are used to identify the position in the reproductive tract until the cervical tubercle is identified. When the external cervical os is identified, the rigid endoscope will be approximately 10 – 30 cm inside the bitches reproductive tract, sitting dorsal to abdominal organs such as the bladder, intestines and liver, and ventral to the spine and kidneys (depending on breed size) (figure 2).

If intra-uterine insemination is performed in diestrus there is an increased risk of inducing cystic endometrial hyperplasia/pyometria (Nomura, 1999). It is therefore important that the operator has sufficient knowledge and training of the method and technique being used (TCI) in order to reduce risk of harm to the bitch. It is important that the person be competent in the procedure.

If TCI is performed in diestrus or anoestrus there is an increased risk of perforation of the vaginal wall as its much thinner at these times. Perforation can occur after sudden movement of the bitch, or excessive pressure from the person performing the technique (Romagnoli 2014).

Meeting the definition of a SSP, TCI:

- Has the potential to cause significant pain or distress if the reproductive tract is perforated, the risk of this increases at certain stages in the bitches heat cycle.
- There is a risk of infection and/or haemorrhage from incorrect use of the equipment and lack of knowledge of the procedure.
- Has the potential to cause serious or lasting harm and loss of function (including reproduction) if not performed by a competent person
- AND
- The nature of the procedure involves a procedure within the abdominal cavity of a dog and physically interferes with sensitive soft issue.

- The rigid endoscope is placed at least 10-30cm within the reproductive tract of the bitch to facilitate catheterisation of the cervix. There is significant risk of damage when performing this technique if the person is not suitably trained.



Figure 1 The canine cystourethroscope and ureteroscope (Romagnoli et al)



Figure 2. Performing an EIU in a bitch. The cervix can be seen clearly catheterized by the TCI (Mason et al)

## **XII. Restrictions on devoicing unless in the best interests of the animal.**

Dogs NZ agree that this does not require regulation.

Dogs NZ would like to note that the reasons for a dogs barking can be beyond that of behavioural deficits. It can also be situational, breed specific (terriers) or environmental (Siniscalchi 2018). Debarking should always be done as a last resort; however, the procedure should be available if required if it confers a net animal welfare benefit to the animal.

## **XX – restrictions on desexing**

Dogs NZ agrees that this does not require regulation and is a veterinary only procedure.

Desexing in New Zealand is carried out mostly for the benefit population control, not to improve the health and welfare of the individual animal and is therefore an elective procedure. There is growing scientific evidence to suggest that keeping a dog entire, or delayed de-sexing is beneficial to the individual dog depending on its size and other factors (Torres 2013, Duval 1999).

In Northern Europe, particularly Sweden, Norway and Denmark surgical neutering is seen as a ‘mutilation’ and must only be done for medical reasons which does not include population control. If a vet performs surgical neutering in these countries for purposes other than disease, then they will be found guilty of professional misconduct. In these countries, chemical castration in male dogs using deslorelin (Suprelorin) is commonly used and the product sale ranks first in Virbac sales in Denmark (Virbac 2013).

## **XXI – Scaling of dog and cat teeth**

Dogs NZ agrees this does not require regulation as does not meet the requirements of an SSP.

It is common for animal owners, groomers and other persons involved in routine dog husbandry to brush a dogs’ teeth, or remove gross tartar using finger nails or simple dental instruments.

Dogs NZ would like to see educational material provided to those currently performing scaling above the gingival line, to provide guidance when to refer for further veterinary investigation of dental disease.

Dogs NZ would also like to point out that dogs that are regularly sent to a groomer or boarding facility will have also regularly seen their veterinarian due to vaccination requirements for admittance into their facilities. Veterinarians and groomers will always do a teeth check as part of their service and make recommendations if required.

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