



Billy Montgomery  
DARDNI  
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10 February 2012

Dear Billy

As President of the North of Ireland Veterinary Association (NIVA) I am writing in response to your invitation to comment on the draft codes of conduct for the welfare of non-human primates, horses and rabbits.

NIVA has consulted with colleagues from the Association of Veterinary Surgeons Practising in Northern Ireland (AVSPNI) and, where appropriate the relevant local and national specialist divisions, in particular BSAVA(NI) and BEVA. Between them, NIVA, AVSPNI and BSAVA(NI) represent vets working in all areas of the profession in Northern Ireland, and as such we are well placed to provide a consensus view on issues of concern to veterinary surgeons. NIVA is also a territorial division of The British Veterinary Association (BVA) which is the national representative body for the veterinary profession in the United Kingdom and represents over 13,000 members.

In close liaison and with the full support of the BVA we would like to state our broad support for the codes.

#### **Draft code of conduct for the welfare of non-human primates**

We believe the Code is an important tool in educating owners about their responsibilities for the health and welfare of their pets and the legal duty of care they have for their animals. With that in mind we are concerned by the use of the term 'keeper' throughout the draft as this does not provide complete clarity regarding those responsibilities. In its current wording, we are concerned that owners may infer that prosecution under the Animal Welfare Act could be avoided by blaming an employed keeper for any breaches of the Act. We are pleased that the draft code for primates discusses aspects of natural and untypical behaviour in some detail, as well as addressing practical aspects of primate care

In addition, we would like to express our concern that by issuing a code of practice for the welfare of non-human primates, DARDNI could be seen to be encouraging, or at the very least endorsing, the keeping of non-human primates as pets by the general public. Primates are long-lived, intelligent, socially-complex animals and we can think of no circumstances where a primate would benefit from being kept privately as a pet. We do, however, very much welcome the proposed guidance for the keeping of primates in professionally managed centres and for species conservation.



Finally, in order to realise the code's objective of improving animal welfare it should be accessible and easy to understand. We found the format of the document confusing to follow as it was not structured in the same way as the other Codes, including the Codes for the welfare of dogs and cats which were consulted on at the end of last year.

### **Draft code of conduct for the welfare of horses**

We understand that the draft Code for the welfare of horses was intended to be straightforward and brief in order to be clearly understood by lay persons, perhaps with limited background knowledge of horse welfare requirements. We believe that this has been achieved and is an appropriate approach given that more comprehensive information is readily available for those who wish to delve further (eg the National Equine Welfare Council Compendium which is frequently referred to in legal proceedings).

Following consultation with colleagues at the British Equine Veterinary Association we are content that the Code is, on the whole, fit for purpose and we particularly welcome the identification of a responsible body for horse welfare, namely Local District Councils.

Regarding the detail of the Code:

- Page 7: The advice that "Electric fences should be designed, installed and maintained so that contact with them does not cause momentary discomfort to the horse" should be amended to "...so that contact with them does not cause *more* than momentary discomfort"
- Page 8: The advice that "It is better to feed horses off the ground with the use of a hay net" should be amended to "It is better to feed horses off the ground *than* use a hay net".
- Page 9: regarding tethering, the advice both suggests that water should be made available frequently and regularly, and also that it should be available continuously. This advice seems to be slightly contradictory. The Code should make clear whether water should be available constantly, or frequently.
- Page 11: The advice states that "Feeding in excess of energy expenditure on a long-term basis leads to obesity, which can result in health and welfare problems. Obesity is a serious welfare concern as it can lead to many health-related problems" This appears to be repetition and the paragraph could be shortened without compromising clarity.
- Page 27: regarding passports, the Code states that the purpose of a horse passport is to record all medicines that a horse receives and implies that it is the duty of the veterinary surgeon to record that information in the passport. VMD guidelines state that there is no statutory requirement for medicines, other than vaccines, to be recorded for a non-food producing horse. For a horse that has not been signed off from the food chain, records must be kept but there is no obligation for this to be on the medicines page of the passport, but it is acceptable if it is the preference of the owner/keeper. We understand that the requirements may differ in Northern Ireland and it is important that this is thoroughly checked before the publication of the Code. The draft as it stands places an obligation on the vet to record medicines in the horse passport and we are concerned that this may not be correct.



We understand that colleagues from BEVA will be supplying DARDNI with a document developed by the Equine Establishment Working Party which outlines specific procedures for equine establishments. The document covers responsibilities for yard/grazing managers and keepers such as insurance, health plans, worming programmes, written arrangements with owners, fire and other health and safety issues. We believe that the intention is for the advice to be included as an Annex to the Codes for England, Wales, Scotland and Northern Ireland. We would encourage DARDNI to review it in full once it becomes available and, if appropriate, give consideration to its inclusion.

With an increase in abandoned or welfare-compromised horses - largely due to the recession and over-breeding - comprehensive advice on the owning and caring for horses as set out in the draft code is timely and we hope the Code will go far in helping owners understand their horse's welfare needs.

### **Draft code of conduct for the welfare of rabbits**

We are extremely pleased to see that DARDNI has followed the lead of the Welsh Government by drafting a code of practice for the welfare of rabbits. BVA has previously expressed disappointment that Defra had no plans to do so when vets are seeing more and more husbandry-related problems with these popular pets. Dental disease and obesity are two of the most common problems we encounter and both are directly linked to inappropriate diets. Another issue of concern is inadequate space for exercise - but perhaps the most neglected of all the welfare needs is a lack of companionship for these very social animals.

We are pleased that DARDNI is taking the opportunity to educate owners about responsible rabbit ownership and improve the health and welfare of the UK's third most popular pet.

Regarding the detail of the Code:

- **Cover page:** the rabbit hutch pictured on the cover of the Code does not appear to meet the recommendations regarding a suitable environment as outlined within the Code, in particular the proposed minimum size of 'three hops' from end to end. We would suggest that the cover picture is replaced with an example showing an environment at least equivalent to the minimum requirements.
- **Clause 1.3 – 1.4:** the recommended minimum accommodation requirements appear to discuss the needs of single rabbits despite later referring to the need for suitable companionship. The guidance produced by the Welsh Government regarding the welfare of pet rabbits includes the requirement to ensure that minimum accommodation needs are met for all rabbits kept, stating "If you keep more than one rabbit together, there should be enough space so that each adult rabbit can behave like this. There should also be safe hiding places where each rabbit can choose to be alone if it wants to." We believe that DARDNI guidance should include similar clarification.
- **Clause 1.3:** we believe that further detail is required in this section explaining that the environment should include a large living area and a secure shelter where the rabbits can rest, feel safe and protected from predators, extremes of weather and noise. All areas of the environment should be well ventilated,



dry and draught free as damp, poorly ventilated, hot or dirty environments can cause illness.

- **Clause 1.4:** we support the proposed 'three hop' minimum size, however, we feel it should be made clear that this is an absolute minimum. We are also conscious that the definition of 'three hops' may not be well understood and may be commonly underestimated. As three hops for a medium sized rabbit can cover 6 feet we feel that additional clarification is needed.
- **Clause 1.7:** it should be made clear in this section that all welfare needs must still be met when keeping rabbits indoors. There may also be additional safety requirements including the need to prevent access to electrical cables which rabbits may chew through. It should also be stressed that rabbits are prone to heat stroke and that central heating can cause health problems.
- **Clause 2.5:** we believe it should be made clearer that *all* fruit should be regarded as a treat item and fed in limited quantities only. Fruit is high in sugar and can lead to gastro-intestinal disturbance as well as the more obvious dental problems. This section should also state that high-fat or high-carbohydrate foodstuffs should be avoided completely including commercial 'treats', bread, milk, breakfast cereal, nuts, seeds and chocolate.
- **Clause 3.3:** the importance of socialisation with people and other rabbits should be extended to include socialisation with other animals
- **Clause 4.1:** this should be amended to read "*some parts of* this section may not apply if you are planning to breed from your rabbit"
- **Clause 5.8** the table listing the recommended daily health checks to perform on rabbits should also include a check on the mouth/chin as signs of dribbling can indicate problems with overgrown teeth. The recommended check on rabbits' bottom should also be for signs of urine staining in addition to diarrhoea.
- **Clause 5.9:** this section relating to the dangers of fly strike should also recommend checking rabbits daily for wounds or injuries.

Notwithstanding the suggested additions and amendments to the draft Codes, DARD must be applauded for creating these opportunities to provide detailed guidance on responsible ownership of rabbits and horses as well as the keeping of primates.

Best wishes

Bert Allison  
President NIVA