



July 18, 2011

Submission by the Vancouver Humane Society to:

Lindsay Kislock  
Chair, BC Sled Dog Standards of Care Working Group  
Assistant Deputy Minister  
Ministry of Agriculture

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## **Introduction**

In a previous submission dated February 25, 2011 the Vancouver Humane Society expressed its opinion that nothing short of a ban on the sled dog industry was acceptable. Nothing that we have subsequently learned has changed that opinion – we still believe that it is impossible to adequately enforce a standard of care to ensure proper care of the dogs used in sled dog touring or racing businesses. This is primarily due to the businesses' remote locations and the lack of public scrutiny for the majority of the time.

It is also our opinion that there is no difference between the needs of a companion dog and those of a working dog; sled dogs are entitled to the same standard of care as are companion animals who live in the city as valued and beloved members of their families. We believe that this opinion is shared by most people in our society. However, as impossible as this is to accomplish for dogs under any business model, it is more so where dozens, if not hundreds, of dogs find themselves under the oversight of a minimal number of caretakers. In fact, time after time it has been shown that when animals are used as a revenue source, their welfare is compromised, often severely, when financial difficulties become a reality.

At the same time, we are grateful to the Sled Dog Industry Task Force for its recommendations and to the Province of British Columbia for accepting those recommendations and acting quickly to establish a working group to develop a sled dog 'standard of care'. We are hopeful that the standards set the bar high, sending a strong message to this industry that it cannot use animals as throwaway items to be discarded when no longer useful. We also hope that the attention to this issue will move society closer to a future where all animals are treated with respect and attention to their needs by those on whom they depend for their very lives.

We hope that you will take the following comments and suggestions into consideration.

**Standards of care** must ensure:

- Sterilization of all dogs to avoid fighting and frustration;
- Planning for care during the low season;
- A high ratio of caretakers to dogs to ensure proper socialization, care, feeding and exercise;
- Regular, high-quality and appropriate food, ensuring that dominant dogs are not getting more than their share;
- Regular veterinary care, especially when medically necessary;
- Zero tolerance for ‘culling’ puppies, other than for medical or quality of life issues;
- Regular and appropriate exercise to meet their needs; avoiding being confined on a regular basis for long periods, or exposed to extreme exercise;
- A ban on tethering, except when necessary for specified periods when away from the home base;
- A ban on ‘cutting’ (amputating) canine teeth in sled dogs;
- Shelter appropriate to conditions, i.e. heated shelter in winter and relief from heat in summer;
- Safe, secure and ventilated transportation in which dogs can stand or sit with comfort;
- Planning, beginning at birth and including socialization and training, for retirement and/or re-homing for animals that will no longer be used;
- When euthanizing is necessary due to illness or old age, it be carried out by a veterinarian;
- A prohibition on shooting, beating or slashing of dogs as accepted methods of euthanizing.

**The regulatory authority** must:

- License sled-dog businesses and include a fee which should be used to fund unannounced, third-party inspections by animal welfare organizations such as the BC SPCA which are entrusted with enforcement of animal welfare legislation;
- Ensure adequate funding of such agencies;
- Guarantee anonymity to whistleblowers;
- At all costs, avoid establishing a ‘conflict of interest’ situation, where industry is regulating itself.

## **Additional commentary**

### Tethering

The U.S. Department of Agriculture issued a statement in the July 2, 1996 Federal Register against tethering:

“Our experience in enforcing the Animal Welfare Act has led us to conclude that continuous confinement of dogs by a tether is inhumane. A tether significantly restricts a dog’s movement. A tether can also become tangled around or hooked on the dog’s shelter structure or other objects, further restricting the dog’s movement and potentially causing injury.”

[http://www.humanesociety.org/issues/chaining\\_tethering/facts/chaining\\_tethering\\_facts.html#Who\\_says\\_tethering\\_dogs\\_is\\_in\\_humane](http://www.humanesociety.org/issues/chaining_tethering/facts/chaining_tethering_facts.html#Who_says_tethering_dogs_is_in_humane)

The BC SPCA recommends that you never tether a dog, since dogs are social and crave and thrive on companionship and interaction with people and other dogs. Tethering frustrates these needs and can cause them to become aggressive, anxious and neurotic.

<http://www.sPCA.bc.ca/assets/documents/welfare/Tethered-Dogs/10-questions-about-tethered.pdf>

According to the Humane Society of the United States ([www.humanesociety.org](http://www.humanesociety.org)) a tethered dog is nearly three times as likely to bite as dogs who are not tethered.

### Culling

Culling is common practice among mushers. “Killing unwanted sled-dog puppies is part of doing business” (Anchorage Daily News, October 6, 1991) Mushers also cull dogs who are injured, old but otherwise healthy, or any dog who is not wanted for any reason. “They (the big racing outfits) can’t keep a dog who’s a mile an hour too slow”. (Currents, Fall, 1999)

<http://www.helpsleddogs.org/faq.htm#7a>

## **Position Statements**

### *Humane Society Yukon*

“At Humane Society Yukon, we firmly believe that the same standards should apply to the care of ALL dogs. These standards include adequate food and shelter, minimal tethering, lifelong commitment by animal owners and safe, secure transportation when dogs must ride in motor vehicles.”

<http://humanesocietyyukon.ca/positionstatements.html#dogcarestandards>

## *Canadian Veterinary Medical Association*

“The Canadian Veterinary Medical Association (CVMA) is opposed to the practice of cutting canine teeth in dogs.”

### Background

“The cutting of sled dog teeth to reduce the severity of bite wounds, especially in children, has been proposed as an alternative to responsible pet ownership. This disarming technique poses a serious animal welfare concern.

“The actual procedure involves manual restraint, the use of a mouth gag, and breaking off the four canine teeth near the gum line using metal snippers (large bolt or wire cutters). Typically, neither anaesthetic nor analgesic is used during the Cutting, and no care is provided to the dog following this extremely painful procedure. Infection and chronic pain are the major complications arising from this procedure. The procedure conducted in this manner is inappropriate and inhumane. Disarming sled dogs could only be considered humane if current veterinary dental techniques (such as crown amputation and partial pulpotomy), anaesthetic and analgesics are used.

“Proper management of dogs, such as proper housing and restraint, would reduce the risk of bite wounds. For example, reducing child exposure to dogs may be accomplished by housing dogs in areas inaccessible to children. (Revised July 2003)”

### Conclusion

We hope that the B.C. Sled Dog Standards of Care Working Group will formulate strong standards of care for sled dogs in British Columbia and that some effective way is found to enforce those standards. It remains troubling that had a claim for post-traumatic stress not been filed with WorkSafe BC, no one would be the wiser regarding this brutal event.