

## **VETERINARY IRELAND MEDIA RELEASE (Wednesday 13th November 2013)**

### **Veterinary Ireland expresses shock that tail docking and dew claw removal of dogs will be permitted**

Commenting on behalf of Veterinary Ireland, Alan Rossiter, veterinary practitioner in Greystones, Co Wicklow and immediate past-President of the organisation said:

"Tail docking and dew claw removal of puppies cause pain and risk. They confer no welfare benefit to the animal and therefore there is no good reason to do them."

"For these reasons vets have been quite correctly told by our regulator the Veterinary Council of Ireland that we cannot do these procedures as they are unethical. If we do perform them we could be struck off."

"I am quite shocked at the proposals we have seen in these draft regulations. Aside from the fact that these procedures are not necessary, the allowing of non-vets to do these surgical procedures, using no anaesthesia or pain relief, is appalling and will send us to the bottom of the European welfare league. Their allowance will in fact remain the only block to joining with 22 other European states in ratifying the Council of Europe's European Convention on Protection of Pet Animals"

Veterinary Ireland, along with the ISPCA and Dogs Trust have written a joint letter to the Minister on this matter and have sought an urgent meeting.

"We have for years called for these procedures to be made illegal. As a true proponent of animal welfare we do not believe it was ever Minister Coveney's intention for this new and excellent Act to be used to allow anyone perform unnecessary and painful mutilations on animals and we are confident he will ensure the regulations are amended before he signs them, thus ensuring these procedures are prohibited."

**>>Ends<<**

For comment and interviews please contact Alan Rossiter MVB, immediate past-President of Veterinary Ireland

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#### **Notes to editors**

**Please find attached to this e-mail an open letter and briefing document from Veterinary Ireland, the ISPCA and Dogs Trust to the Minister for Agriculture, Food and the Marine, Mr. Simon Coveney T.D.**

Tail docking and dew claw removal of dogs is the removal of some or all of a healthy and normal tail or the inside digit of a dog.

Section 16 of the Animal Health and Welfare Act 2013, once commenced in the coming weeks, will prohibit any procedure that interferes with or the removal of the sensitive tissue or bone structure of an animal unless the specific procedure is for veterinary treatment (i.e. performed by a registered veterinary practitioner for therapeutic reasons to treat existing illness or injury) or is specifically permitted by way of a Ministerial regulation.

The Act itself, if left unfettered, would therefore prohibit tail docking and dew-claw removal of dogs. However draft regulations seen by Veterinary Ireland have revealed that these procedures will be permitted by non-vets using no anaesthesia or pain relief.

Section 16 of the Act completely prohibits any procedures performed for cosmetic reasons, as well as the showing of any animals that have any prohibited procedure performed upon them. A Ministerial regulation cannot be introduced to allow for the performance of a cosmetic procedure, to do so would be in contravention of Section 16 the Act itself. Veterinary Ireland believes that dew claw removal and tail docking are cosmetic procedures.



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Minister Simon Coveney T.D.,  
Department of Agriculture, Food and the Marine,  
Agriculture House,  
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12 November 2013

**An open letter to Minister Simon Coveney from Veterinary Ireland, Dogs Trust and the Irish Society for the Prevention of Cruelty to Animals regarding tail docking and dew-claw removal**

Dear Minister Coveney,

The latest drafts that we have seen of the regulations to be made under Section 16 and 17 of the Animal Health and Welfare Act 2013 allow for tail docking and dew claw removal of dogs, and that they may be performed by non-registered persons (i.e. persons other than Registered Veterinary Practitioners) using no anaesthesia or pain relief.

These are procedures that are done for cosmetic reasons. Their performance causes unnecessary short and long-term pain and suffering. Independent unbiased scientific studies show they do not confer any welfare protection to the animals on which they have been performed, including 'working dogs'.

For these reasons Veterinary Ireland, the Irish Society for the Prevention of Cruelty to Animals and Dogs Trust in Ireland call for removal of these provisions from the regulations.

In this regard we mirror the stance of the Veterinary Council of Ireland who, aside from asking for these procedures to be prohibited, have also ruled that Registered Veterinary Practitioners must not perform these procedures as they are unethical.

The performance of surgical procedures for cosmetic reasons is prohibited in Section 16 of the Act. To cause unnecessary pain and suffering is in contravention of Section 12 specifically, as well as the spirit of the Act generally. We therefore believe that these two procedures cannot be allowed for by way of regulation as to do so would be in contravention of the Act itself.

Finally most European countries - at least 22 - prohibit these procedures. Any regulation allowing for their performance will become the only bar on Ireland from being the 23<sup>rd</sup> European state to ratify the Council of Europe's *European Convention for the Protection of Pet Animals*.

Accompanying is a briefing document we are making available to the members of the Oireachtas.

As an avowed proponent of animal welfare we very much trust that you will reconsider the provisions of the current drafts, and you can be assured of our absolute and full public support should you do so.

Yours sincerely,

**Alan Rossiter MVB**

Veterinary Ireland

**Barbara Bent**

Chairperson,  
Irish Society for the Prevention  
of Cruelty to Animals

**Mark Beazley**

Executive Director,  
Dogs Trust in Ireland



## **Briefing document for members of the Oireachtas: Tail docking, dew-claw removal**

### **1. What is tail docking and dew-claw removal?**

These are the removal of some or all of the healthy tail of a dog and of the inside claw – the equivalent of the thumb – respectively.

### **2. What are the provisions in the draft regulations?**

To allow non-vets to perform these procedures on animals up to 4 days of age without any requirement for anaesthesia (general or local) and pain-relief.

There are provisions to limit tail docking to certain breeds or crosses of these breeds, associated to hunting organisations, but it is clear that apart from making no scientific sense this section of the regulation will be unenforceable.

### **3. Why is there a provision in the draft regulations to allow non-vets to do these procedures?**

Frankly we do not know.

### **4. Who currently does these procedures and how?**

Vets cannot do them as they are unethical as they have been shown to confer no benefit to the dog.

They are generally performed by the breeder, or sometimes ‘the docking-man’, using a knife or blade, using no anaesthesia or pain relief. Sometimes rubber rings are used, sometimes nail clippers.

### **5. Are the people that do them trained to do so?**

These person have received no formal training, and they are not subject any regulation.

There are no training courses to show someone how to do these surgical procedures (apart from a five year degree course in veterinary medicine).

### **6. Are these procedures painful?**

In a recent survey 98.8% of the Irish veterinary profession were of the view these procedures in young animals cause pain.

### **7. What problems are caused by them being done?**

Apart from the pain inflicted at the time of the procedure, these procedures can cause infections, bleeding, wounds that will not heal and, in the case of tail docking, damage to the spinal cord.

A large proportion – half if not more – of tail injuries seen by vets are actually due to complications following tail docking done by non-vets.

## **8. Why are they done?**

They are performed for cosmetic reasons, to make an animal look better.

If there is any doubt that the reason for performance of these procedures is anything but cosmetic can we quote from an article in the Sunday Times of 10<sup>th</sup> November 2013: *“Sources at the (Irish Kennel) Club say most show dog enthusiasts are keen to ensure the practice continues as it makes animals look more attractive in the ring.”* (Article 16 of the Act makes it an offence to show dogs that have been mutilated.)

## **9. Why do vets not perform them?**

Vets will not and can not perform cosmetic procedures, and are indeed prevented from doing so both by legislation (Article 16 of the Animal Health and Welfare Act) as well as rulings by the Veterinary Council of Ireland that these procedures are unethical.

In short vets can only operate on an animal when there is a good reason to do so, and until such time as there is scientific proof that these procedures benefit the animal then vets cannot do them.

## **10. If these are surgical procedures - “procedures that form part of the practice of veterinary medicine” - how can it be legal for a non-vet to do them?**

The draft regulations have invoked Section 54A of the Veterinary Practice (Amendment) Act 2012 to render it lawful for non-vets to do these surgical procedures.

This amendment to the Veterinary Practice Act 2005 was introduced to codify and regulate non-veterinary service providers such as farriers, equine dental technicians and animal physiotherapists.

We believe it was never the intention of the Oireachtas for this provision to be used in this way, to permit non-vets to perform a surgical procedure that vets will not do, and indeed are not permitted to do, on ethical grounds.

## **11. Why are Veterinary Ireland, Dogs Trust and the ISPCA requesting removal of these provisions in the draft regulations?**

These procedures have been shown to cause short and long-term pain. They expose the animal to undue risk of infection or bleeding. Tail docking can cause long-term spinal cord damage. They confer no benefit to the animal, only pain and risk. They are therefore mutilations – removal of healthy tissue for no good reason.

To permit these surgical procedures to be done by non-vets using no anaesthesia or pain relief will cause unnecessary pain and suffering.

Also it is our belief that it is actually in contravention of the Act to allow by regulation any procedure that is performed for cosmetic procedures or that will cause unnecessary pain and suffering.

## **12. The Council of Europe has a Convention regarding these procedures?**

Article 10 of the Council of Europe’s *European Convention for the Protection of Pet Animals* specifically prohibits these procedures as they are considered mutilations. 22 countries have ratified this Convention, thus demonstrating that at least 22 European countries have prohibited these procedures.

The commencement of Ireland’s new Animal health and Welfare Act – the envy of Europe – should have opened the way to Ireland being the 23<sup>rd</sup> country to ratify this Convention. However if the regulations allow for these procedures then we cannot ratify it. These two procedures will be the final and only bar to us doing so.

### **13. What about working dogs? Is it not better that they are docked to prevent future tail injuries sustained in the course of hunting?**

This is a valid question to ask.

There is a belief held by some that the incidence of tail injuries suffered by some breeds of full tailed working dogs is high enough to say that their long-term welfare would be enhanced by being preventatively docked as pups.

We have examined this thesis with an open mind and with these animals' short and long-term welfare being our only concern. Based on all the published studies we have available to us we do not subscribe to the view that docking all dogs of a cohort is of net benefit to that population of dogs.

In essence studies have demonstrated that the incidence of tail injuries in working dogs is not significantly greater than in non-working dogs of the same breed – docking therefore is not justified.

We will of course examine any new scientific evidence in a professional and objective manner and if the science dictates we will re-examine our policies.

However it always needs to be borne in mind that every dog that has been docked suffers a tail injury in the act of docking, thus the lifetime incidence of tail injury in any full tailed dog needs to be higher than 100% to justify docking it initially.

#### **Some final facts & figures**

- In no other state where tail docking is prohibited has there been a decision made to re-introduce it.
- Cats suffer far more tail injuries than dogs. However any request to allow for the docking of kittens' tails by a non-vet using no anaesthesia or pain relief would of course be refused.
- The incidence of tail injuries is 0.2% in undocked dogs – 1 dog in 500 injures its tail in its life.
- Thus you would have to dock 500 tails to prevent 1 tail injury
- 100% of dogs that have been docked have suffered a tail injury (by being docked)
- The incidence of tail injuries could thus be reduced by 99.8% just by not docking them.
- c. 50% of the tail injuries seen by vets are due to complications of tail docking by non-vets.
- 93% of tail injuries seen by vets are caused by reasons other than working/hunting.

#### **To conclude**

100% of docked dogs have suffered tail injuries –docking causes more injuries that it could ever prevent

It is clear therefore that our opinions, the opinions of the Veterinary Council of Ireland and indeed those of at least 22 other European states and the Council of Europe are not based on dogma. They are based on the science of what is best for the short and long-term welfare of the individual animal.

All the evidence says that these animals will suffer more by having these painful procedures performed upon them, not less, and therefore there is no good reason to allow them to be performed. This is the reason vets refuse to do them, and why welfare organisations want them prohibited.

To ignore the ethical considerations of the veterinary profession and the experience of the State's major animal welfare organisations and to instead allow these procedures to be done by non-vets using no anaesthesia or pain relief is misguided and would drive us to the bottom of the European welfare league.