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To the attention of
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Consultation on the Draft concerning Control of Dog Population in Montenegro

Dear Director Dakovic

Introduction:

Fiona Sawney shared your Draft for a National Strategy concerning the Stray Dog Population in your country with me. Allow me some comments as a Swiss NGO specialized only on Stray Dog Population Control – an NGO that has led in the last 5 years strategic programs in Kosovo and with other NGOs in Albania to reduce the Stray Dog Population in certain Municipalities and is currently leading a project in Niksic.

First of all let me congratulate you for the fact, that Montenegro as first state on the South Balkan implemented the registration of dog owners, breeders and chipping of dogs. This step is extremely important to control the dumping of dogs in the streets.

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Important is a general CNVR (catch-neuter-vaccinate-release) Program as well as preventive sterilization of owned dogs that are allowed to roam free. Therefore we recently started a program with DVM Nebojsa Gorasevic in Niksic, up to now mainly preventive spaying/neutering owned dogs for free, if an owner cannot afford to pay for this treatment. We want also to spay/neuter stray dogs in this region, with the knowledge of the Municipality, and have informed the Mayor. Only our aims are different from OIE.

OIE is a French based Veterinary Organisation, which is not supported by animal activists and Animal Welfare NGOs, as they accept Euthanasia and Killing of healthy dogs. France kills dogs, Spain and Belgium do the same in their shelters as soon as they need more space. All other northern European Countries as well as Italy do not allow to kill healthy dogs. The NGOs all fight “death camps” for dogs and this movement is growing. It is unethical to kill healthy dogs and it is not supporting the trust in the veterinary skills and know how in a country.

The problem of Euthanasia occurs as a state starts building shelters and removes roaming dogs from the streets, as parts of Municipalities in MNE are practicing. Building shelters is an invitation for citizens to get rid of their dogs and make the state responsible to keep them. Shelters are expensive, the amount of sheltered dogs is growing continuously – and as soon as a Municipality cannot afford to care for the dogs and feed them, they start to kill them to reduce costs – a very unpopular measure in modern society, unethical and cruel.

Specially Tourist countries – and Montenegro is a growing tourist country – will get protests concerning “Death camps” for dogs – Berane is known for their cruel treatment of dogs. Ulcinj is killing dogs in the state shelter. A well know Liechteinstein Foundation of a rich entrepreneur wanted years ago invest in good shelters in MNE, and their general secretary found out they were killing dogs – and never invested in your country.

Conclusions:

We consider it is critical and in favor of a good image of your country to **delete the last point of your list** – try to get a no kill country, you have done the best

step with the controlled dog ownership this year. All other mentioned points from OIE else are good or acceptable – but we will add a critic concerning sheltering in General for the moment. As soon as the control of dog owners functions, the stray dog population will slowly reduce and from then on shelters are an option – if adoptions work out in your country.

Comments to your proposal in red:

- Education and legal framework that encourages responsible ownership; **Very good!**
- Establishment of a dog identification and registration system; **Perfect! Needs control by police and veterinary services.**
- Control of breeding dogs for sale; **Important!**
- Control of unscheduled dog reproduction; **Offering free or cheap spaying/neutering to owned dogs that are allowed to roam – foreign NGOs will help.**
- Establishment of human trapping services and establishment of shelters for abandoned animals in accordance with the standards laid down by the competent authority; **Not yet! Stop building shelters, make Transitory Care Centers (Animal Clinics for ambulatory treatment of street dogs) like Kosovo.**
- Municipal waste control; **Of course!**
- Prescribing measures on the movement and keeping of dogs and obligations of owners; **Good – Education of kids and continuous information of citizens how to keep animals and where to treat them, vaccinate, sterilise – we are ready to help with our kid-booklets.**
- Dog Movement Control (International); **Would be very nice if you would join Traces.**
- Euthanasia. **Only of sick and suffering dogs with Pentobarbital (no T61 – because often used without anaesthetics) – and very aggressive dogs that cannot be released.**

Sheltering versus Community dogs:

As you see, we consider AT THIS MOMENT the CNVR Method with release instead sheltering as the only practicable way to reduce the stray dog population in a country, where adoptions are rare and abandoning is regular. But that means that the street dogs must be accepted as Community dogs, a model practiced for example in Italy, where it is forbidden to kill healthy dogs

– and practiced in Kosovo, where we work since 5 years. But Kosovo Veterinary Administration does not care enough for CNVR and had only a state program last year, nothing this year. Kosovo has no program for responsible dog ownership, so only the regions where we work with our partner veterinarians have good looking and healthy community dogs. The dogs should stay outside and not be put in shelters. We opposed up to now every shelterbuilding in Kosovo or any country with the practice of dumping unwanted dogs. The state of Kosovo promotes in its regulation the **TCC = Transitory Care Center**. Actually Prishtina is building one. Albania on the other hand is far away from any regulations and a dog killing country.

A **Transitory Care Center** is led by a veterinarian and in cooperation with colleagues they treat, vaccinate, deworm and sterilize stray dogs. After 5 to 7 days later they release them on the spot where they were caught and survived. Once Kosovo has a controlled dog ownership, there will be less abandoning and the TCCs can be transferred to shelters – if the adoption system in the country works. The same we try in Niksic, where we will build a small treatment place for stray dogs with our veterinarian – at the moment only a temporary place - to find out, if the model of CNVR works out in this Municipality.

Also OIE accepts Euthanasia **ONLY if it is the only option and there are no other ways to let a dog alive**. As long as citizens are informed and trained to care for COMMUNITY DOGS, this is the best way in combination with responsible dog ownership. Community dogs that are cared for by neighborhood can live healthy and are not a danger to citizens.

This practice is followed by all real and not state influenced Animal Protection NGOs, they do not accept killings. So for a country that invests in tourism it is inevitable that visitors will get to know about *Death camps” for dogs and many tourists will protest like Spain as soon as they get aware of this practice.

So why not follow the Croatian Animal Welfare Concept – or the models of huge International Animal Protection NGOs that all work with CNVR to reduce the stray dog population, sterilizing as a prevention method owned dogs as well?

Shelter Building should be stopped – shelters converted to TCCs for the moment, some shelters kept because dogs that lived long in a shelter cannot be released again. And if possible the Community dog Model should be implemented.

A last Point: Registration, Chipping and Controlling are an important step to reduce the stray dog population down to Zero. But there is another important measure to take: Every person that abandons willingly a dog should be punished hard. We have no stray dogs in Switzerland and northern EU Countries, but we punish dumpers:

SWISS REGULATION contains punishment of maltreaters and people that abandon:

Under the Animal Protection Ordinance, training is required for certain animal husbandry units and in particular for the commercial handling of animals. The compulsory training provides knowledge and practical skills which are necessary for the proper housing and careful handling of an animal.

Chapter 5: Criminal Provisions⁹ Article 26

Maltreatment of animals

1 Anyone who wilfully a. mistreats or neglects an animal, unnecessarily overworks it or in any other way disregards its dignity; b. deliberately and without provocation kills an animal in a manner that causes it suffering; c. organises fights between or with animals in which animals are tormented or killed; d. inflicts pain, suffering or harm on an animal or induces anxiety in it during the course of experiments, unless this is unavoidable for the purpose of the experiment; e. **abandons or leaves behind** an animal that is kept in the house or on the farm with the intention of disposing of it **is liable to a term of imprisonment or a fine**

2 If the offender acts through negligence, he is liable to a term of detention or a fine of up to **20,000 francs**.

https://www.zuerchertierschutz.ch/fileadmin/user_upload/Tierschutzthemen/pdf/Tierschutzgesetz_e.pdf

Finally and once more: OIE is a Veterinary Organisation, purely reduced to health of animals, food health and the veterinary professions. But in modern legalization of Animal Welfare NGOs should be heard and respected, as they have other more humane methods to treat animals. And Euthanasia is not acceptable in a modern Society. So please reconsider this point. Your perfect suggestion is: **identification and registration, control of breeding and sale of dogs, control of breeding and promotion of responsible ownership and effective penal policy. – just ban euthanasia and killing of healthy dogs.**

I hope you accept the comments of our Swiss Foundation that has only recently started a prevention program in your country. Thank you for reading and hopefully considering our concerns.

Sincerely

Dr. Helen Wormser
President of Foundation

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