

Comments on the Draft administrative instruction No XX/2022

Russikon, 07-11-2022

StrayCoCo Foundation is a registered Foundation in Switzerland, controlled by the state and taxfree.

Our Foundation promotes Small Animal Medical Care in countries where the pet service has not reached yet a good standard, we invest in start ups (in Kosovo pet clinics Gjakova, Vushtri and Drenas) and do in 4 regions continuous CNVR programs. Our partner Veterinarians are furthermore obliged to teach in schools. We care for animal laws, promote responsible ownership and do awareness campaigns from time to time. We work in Kosovo since 1.1.2015 and have invested over 1 Mio Euro in start ups and pet treatments.

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Our contribution

In general, we consider the construction of shelters in Kosovo at this time as much too early, given the amounts of stray dogs. CNVR should be applied in all places continually until the straydog population has reduced. Furthermore the chipping/registration program should start everywhere and be done for 3 -5 years until all dogowners are under control and will be punished for abandonment of their dog or irresponsible keeping, which leads to accidents with citizens.

We do not comment the details of the technical conditions and requirements, we think the regulation is much to detailed, overregulated and does not leave enough space for creative other models – thinking for example about the model in Costa Rica which is dog friendly, like <https://www.territoriodezaguates.com/> Important is that the dogs needs for movement and wellbeing during their stay in a shelter is guaranteed.

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Art. 23/ 3 and 4

We agree with the proposal that animals from §2 are euthanized humanely. Sick animals suffer and aggressive animals cannot be released in the street neither given for adoption. We want to emphasize that aggressive owned dogs should be confiscated and euthanized as well, as they are the biggest risk for your citizens.

We do not agree with the proposal to euthanize formerly owned healthy and not aggressive dogs that have been caught in the street. Healthy dogs should be released in their territory, as we see every day that even owned dogs adapt to the street life and no one knows at the time of catching, since when the dog lived roaming free without disturbing anyone. Adoptions do not work out in Kosovo! And

there is no reason to keep those dogs longer than any other straydog in a shelter. The TCC regulation from 2017 is relevant, all healthy dogs should be released to their territory.

Justification of our comments

- Shelters are NOT a solution to humanely reduce the stray dog population. The concept of Community dogs as applied in some cities of South Italy is at the moment for Kosovo the best solution if treated. (See Michele Minunno https://www.youtube.com/watch?v=N48lpg_MXDw&t=16s)
- Shelters in a modern society can never be allowed to kill healthy dogs. Croatia is a good example, until they joined EU killing in shelters was allowed, now it is no longer. Kosovo should follow the good examples and not join countries like Serbia, Romania, BH or Montenegro, where dogs are regularly killed in the shelters!

<https://www.mdpi.com/2076-2615/9/12/1020/htm>

“National law in some countries (e.g., Bulgaria [59], Italy [60], and Kosovo [61]) prohibits the killing of dogs for the purpose of population control.” The World Health Organization published guidelines in 1990 discouraging the use of culling and recommending alternative methods (e.g., registration and identification, vaccination, public education, and sterilization) [58].

- We are well aware that this regulation pretends that the Art. 23/4 has nothing to do with mass culling. But if the registration program works out, most roaming dogs will be in the near future owned dogs. That will lead to mass euthanasia!
- It is not understandable why formerly owned dogs that can be identified as such, should be euthanized. It is not logical. Those dogs are often less shy, friendly (if not kept on a chain) to people and healthy as they have seen a veterinarian before. They are not a risk for the health of people.
- As WHO recommended already 1990 it is important to wait first for the results of registration, identification, sterilization also of owned dogs and public education. All those as humane considered measures have not been done up to now in Kosovo. But those programs must be implemented before even shelters can be built. At the moment the TCC-regulation (Transitory care centers for CNVR) from 2017 allows the temporary care for dogs found in the streets and that is the most humane solution – besides the urgently needed dog owner control!
- We consider another point as very relevant: The moment Kosovo decides to kill healthy dog in shelters, the international animal protection NGOs will react, and the export from Kosovo and import of dogs into EU, mainly Germany, will raise. Shelters that kill healthy dogs will create a movement of adoptions abroad additional to the already ongoing hundreds of imports out of Romania, Serbia, Bosnia-Herzegovina, Albania, Spain! We want to point out, that OIE made in June 2014 a roadmap for Balkan stray dogs. One of the main speakers from UK was also recently a consultant in the EU group in Kosovo! Only 2 years later RSPCA showed itself “shocked at staggering numbers of animals trafficked into UK from EU” – “Commercial and noncommercial imports from Romania in 2015 rose by a staggering 88% from the previous year. The country is the largest exporter of dogs to

the UK, with 10'8000 coming into the country last year." – because mass euthanasia took place in death shelters!

Owned dogs, Art. 23/4 Proposal:

4. Animals that are caught on the street and ownership is verified, the shelter contacts the owner and return to the owner is decided. In cases where it is not returned to the owner the regulation 04/2017 is applied and the dog released after treatment to his former territory.

Last remarks:

Last but not least I want to point out, that though we are the only NGO in Kosovo investing in startups of modern pet clinics and sanctuaries, investing in continuous CNVR in certain regions since 8 years, promoting responsible dog ownership that would help to reduce the straydog population, that I as a lawyer am very familiar with Swiss dog laws and regulations, I was not invited to the meetings of AUVK, and was not heard by the EU commission. The consultation group consisted of members from countries which all apply euthanasia and all have stray dogs more or less – Switzerland, Germany and Netherlands have none! Members of countries that do not kill healthy dogs (although the law would allow it under special circumstances) were not admitted in this consulting group! Already 2007 WSPA and RSPCA reported on page 32 of their Stray Animal Control Practices study that Switzerland is unique in its legal requirement for all dog owners to be educated in dog behavior, training and responsible pet ownership. Kosovo could be the same.

<https://www.rspca.org.uk/documents/1494939/0/Stray+dog+and+cat+control+practices+in+Europe+%28WSPA-RSPCA2007%29.pdf/ca537209-64e2-881a-b36d-6abd3795679d?t=1556901393627>

We work as a Swiss NGO since 2015 in Kosovo every day and have from our country the background to know how to solve the stray dog problem. Kosovo is four times smaller than Switzerland – the stray dog problem is manageable without killing of healthy dogs, just following consequently the WHO recommendations since 1990!

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President of Foundation

