



RECOMMENDATIONS Q3 (2021)

5 (OF 15) RECOMMENDATIONS
PRESENTED TO HON ANTON REFALO
(MINISTER FOR AGRICULTURE, FISHERIES,
FOOD SAFETY AND ANIMAL RIGHTS)

BY

THE OFFICE OF THE COMMISSIONER
FOR ANIMAL WELFARE

This is the third set of recommendations being presented, following the first 5 recommendations that were presented in March 2021 and the second 5 recommendations that were presented in June 2021.

COMMISSIONER'S NOTE



As I head towards the end of a turbulent year as Commissioner for Animal Welfare, I write this with mixed and equal feelings of achievement, triumph, disappointment, and frustration.

Over the past months, I've witnessed a lot of goodwill, hard work, and commendable initiatives from many stakeholders. I've also witnessed important communication channels (which were previously severely blocked) becoming open for discussion.

However, many practical changes that need to be implemented for a real and tangible change in this sector, remain excruciatingly slow to come through.

In fulfillment of The Animal Welfare Act CAP 439 Art 44A(2e) I've so far submitted ten recommendations to the Minister for Agriculture, Fisheries, Food and Animal Rights, Hon. Anton Refalo.

I am hereby submitting another five recommendations in this report, to make it a total of 15 recommendations. Since the main contributor of suffering is the sheer explosive number of cats and dogs, this set of recommendations focuses on humanely reducing the dog and cat populations in Malta and Gozo.

In addition to these 15 recommendations, a series of changes to the Animal Welfare Act (CAP 439) have also been suggested and are awaiting implementation.

A handwritten signature in blue ink, appearing to read 'Alison'.

Alison Bezzina
Commissioner for Animal Welfare



RECOMMENDATION 11

A state-funded national neutering campaign for dogs and cats

RECOMMENDATION 12

Better, stricter and enforced regulations on the breeding of dogs

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Electronic Microchipping of pet cats

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Improving and increasing dog-friendly beaches

RECOMMENDATION 15

A central online portal to kick start all adoptions



RECOMMENDATION 11

A state-funded national neutering campaign for dogs and cats

Current Situation:

In the span of just seven years, more than 500 puppies and 5000 kittens can be born from one unspayed female and her offspring. Over the past years, we've seen relatively small-scale attempts at neutering and spaying strays but never a nation-wide campaign.

The Problem:

- Puppies and kittens are unscrupulously abandoned every day.
- Dog and cat shelters are always full.
- Rescuing abandoned and injured dogs and cats aggravates the issue of space.
- Cat colonies are growing at such a fast rate that cat feeders cannot keep up.
- Every kitten season, hundreds of cats suffer and die.
- Such a large population of cats is a threat to the islands' bio-diversity.

Commissioner's Recommendation:

A concentrated state-funded nationwide neutering campaign for both dogs and cats should be launched without further delay. A campaign to safely neuter as many dogs and cats as possible, through the process of TNR (Trap, Neuter, Release) that is run in collaboration between NGOs, Local Councils, Volunteers, Feeders and the Animal Welfare Directorate. The campaign should provide a smooth process via different vets in different locations on the island, as well as recovery options for different scenarios. This effort should also include an educational campaign to dispel the myth that neutering dogs and cats is detrimental to their health, or that allowing them to give birth once is in any way beneficial. Ultimately, the greater good of controlling the stray cat and dog population is of utmost importance to avoid more suffering. The campaign should be held within a concentrated period of time to avoid the vicious cycle of new dog litters and another overwhelming kitten season. The educational effort should also extend to owned cats and dogs that are left roaming freely in the streets and fields.



RECOMMENDATION 12

Better, stricter and enforced regulations on the breeding of dogs

Current Situation:

The current legislation SL437.101 which regulates the breeding of dogs is very vague and very loose making it almost impossible to enforce. This gives lots of leeway for irresponsible breeders to take advantage of the situation for financial gains and puts responsible breeders in a bad light. Facebook, Maltapark and other portals are flooded with posts of dogs for sale with most advertisers being unregistered unlicensed breeders.

The Problem:

As per current legislation, anyone breeding up to 4 litters a year (dogs) does not need to be registered or licensed. This means that a household of three adults can legally breed and sell 24 puppies each, that's more than 70 puppies a year with no legal regulatory framework. In addition, DNA testing is not obligatory, which makes inbreeding and exploiting the same bitch easier. This often results in genetic defects and lifelong suffering both for the animals affected and their owners.

Commissioner's Recommendation:

The Animal Welfare Council has proposed various changes and improvements to the existing law on breeding. My recommendation is that these are implemented without further delay and proactively enforced via a collaboration with the two local dog clubs. An educational campaign should also kick off before the law comes into effect to give current unregulated breeders a chance to adjust,

I believe that among other changes being proposed by the Animal Welfare Council, these four will make a big difference in the current scenario are:

1. Anyone selling even one puppy/animal should be registered and regulated.
2. Parental DNA testing should become obligatory for the sale of any pure breed dog.
3. The sale and purchase of any animal should be taxed accordingly.
4. Tighter controls or a temporary pause on the breeding and importation of Pitbulls and Pitbull mixes. This breed makes up one of the highest percentages of dog breeds in shelters and are the hardest to home.



RECOMMENDATION 13

Electronic Microchipping of pet cats

Current Situation:

Whilst dog owners are legally obliged to microchip their dogs (SL437.101), to date it is not obligatory to microchip pet cats. The possibility has been on the discussion agenda for years, but to date, it is still not a legal obligation. To exacerbate the situation, it is very common for cat owners to allow their cats to roam outside their property making it even more important to be able to identify cats through electronic microchipping.

The Problem:

Our experience with dogs has proven beyond any doubt that electronic microchipping is the only permanent method of identifying pets, the best way of ascertaining ownership and the most effective way of curbing abandonment. With electronic microchipping not being a legal obligation for cat owners, when cats get lost or injured it is almost impossible to trace their owners. It also makes it very easy for an owner to abandon their cat, and in some cases, feeders are stopped from neutering stray cats by people who claim ownership without proof.

Commissioner's Recommendation:

Compulsory microchipping of cats has been introduced in different parts of Europe and Australia. The UK also introduced the microchipping of pet cats as a legal obligation in May of this year (2021). My recommendation is for this to also be introduced in Malta as part of a bigger action plan for animal welfare and curbing the overpopulation of cats. Microchipping is safe, effective and lasts a lifetime. It also encourages responsible ownership and helps cats reunite with their owners when lost or injured.



RECOMMENDATION 14

Improving and increasing dog-friendly beaches

Current Situation:

There are 10 official dog-friendly beaches - 8 in Malta and 2 in Gozo. These are the only ones approved and certified by Environmental Health. But many of these beaches are not ideal for dogs to swim in, are hard to reach and are inaccessible even for people with slight mobility issues. The problem is especially severe in Gozo. In addition, in most of these beaches there are no signs indicating that they are dog-friendly, and no dog litter bins in sight. Whilst dogs can also be taken to other areas that are not official bathing zones, the rules and regulations around this are too complex and too vague for dog-owners to be held responsible should they 'get it wrong,' yet, the penalty for doing so is astronomical - as per SL465.09 Art 19, breaking this law the first time carries a fine of between €232 and €4658 and/or not less than six months imprisonment. On second conviction the fine goes up to a minimum of €465 and a maximum of €11,646 and/or not less than two years imprisonment.

The Problem:

It is becoming increasingly difficult and risky for dog owners to take their dogs to the beach with them. Whilst we encourage and educate treating pets like family members, making it so difficult for dog owners to have their dogs accompany them to the beach is counterproductive and contradictory. The main issue of the matter is water quality and beach profiles and whilst the upkeep of all this is extremely important for the Maltese Islands, a better balance needs to be struck. It is to be noted that dogs are legally allowed on all rocky beaches (except Blue Flag ones), but if the area happens to be a bathing zone, they are not allowed to swim. The main health concern is that dogs might defecate or urinate whilst in the sea. Needless to say, that whilst not impossible, this is highly unlikely occurrence because of the anatomical nature of dogs.



RECOMMENDATION 14...CONTINUED

Improving and increasing dog-friendly beaches

Commissioner's Recommendation:

1. Install clear signage on all 10 existing dog-friendly beaches.
2. Clarify the 'no dogs' signs on rocky beaches - on rocky beaches that are bathing zones, dogs ARE allowed on the rocks, but not in the water. In many of these locations, however, the signs just say 'no dogs.' This gives the impression that dogs are not allowed on the rocks either which is misleading.
3. Install ramps and handrails to make accessing the water easier for humans and dogs alike.
4. Install dog litter bins in clear sight and signs for owners to be responsible.
5. Increase the number of official dog-friendly beaches around the island by identifying non-bathing zones and proposing them to the Environmental Health Directorate and the Superintendence of Public Health for their approval. A few potential beaches have already been identified by my office. These are: St. Peter's Pool in M'Xlokk | Manoel Island | Marsamxett in Valletta, Ta' Xbiex Promenade and Marsalforn (Tal Menqa), Gozo.
6. In highly populated areas that have many official bathing zones consider removing a bathing zone and turning it into a dog-friendly beach. Two areas identified through public feedback are Qawra/Bugibba and Gozo where dog owners many of whom move to these areas for the summer months, claim to have nowhere to take their dogs down for a dip.



RECOMMENDATION 15

A central online portal to kick start all adoptions

Current Situation:

Currently, people interested in adopting an animal, mainly dogs, and cats, need to contact the different sanctuaries separately, ask if they have animals that match their requirements, make arrangements to visit the sanctuaries, and hope to find a good match. In the case of dogs, this involves four sanctuaries at different ends of the island and many more locations for cats. This situation is so daunting that sometimes people wanting to adopt a dog or a cat end up giving up before they've even started. Some put their wish on social media and usually, they are quicker contacted by individuals or breeders, than by the sanctuaries.

The Problem:

As much as it is in the interest of all sanctuaries to get their animals adopted out, all sanctuaries are very busy with operational tasks, so much so that sometimes their response time is very slow. Spending time on the phone responding to adopters' requests is also time-consuming. This makes the initial steps towards adoption very frustrating for potential adopters. Facing so much difficulty at the start of the adoption process is counter-productive and not encouraging adoption at all. Sadly this contributes to the problem of overcrowding in sanctuaries and encourages people to buy rather than adopt a pet.

Commissioner's Recommendation

Create a central online portal (website) on which sanctuaries can upload the animals that are available for adoption. Apart from having photos and videos of the animals, the sanctuaries would also mark different key variables to describe the animal (eg. Age, gender, size/weight, temperament, medical needs, good with kids, good with cats/dogs etc). In turn, potential adopters visiting this portal would also mark their preferred variables (eg. size, age, etc), and the system would automatically match them with available animals that match their criteria. The system should allow a 'no preference' option and a free comment field for potential adopters to add their comments.

A simple example of such a portal can be found here:

<https://www.freshfields.org.uk/freshfields-residents/>

The portal would be just the first step in the adoption process, which would then be followed by physical checks, home assessments, and trials run by the sanctuaries themselves, as is the current normal process. The portal will not in any way replace the human intervention required to match a pet with a family but will simply kick start the process efficiently thus eliminating the daunting experience that potential adopters are currently facing when they start to look to adopt.

The portal can be run by an NGO or by Animal Welfare but the matching and approval of adoptions remain with the individual sanctuaries.



FINAL NOTE

When I was first appointed Commissioner in November 2020, The Animal Welfare Directorate was in dire need of additional resources, especially human resources. Since then, quite a few improvements have been implemented but the main concern, the one thing that will make the biggest difference - an adequate number of appropriate human resources - is still lacking

Whilst some key posts have been filled and the process of recruitment for other posts has been kickstarted, the mere length of the process continues to contribute to animal suffering.

Whilst good governance and thoroughness are admirable, anything that contributes to animal suffering goes against the Animal Welfare Act - the very act my Office has been entrusted to uphold.

I, therefore, cannot stress enough, the importance of accelerating the recruitment process for essential roles such as carers, inspectors, and customer care agents. All three are so fundamental for the basic running of the Animal Welfare Directorate, that despite all good intentions from management, without proper recruitment, both the enforcement and rescue operations of the Directorate are being set up to fail.



Alison Bezzina
Commissioner for Animal Welfare

