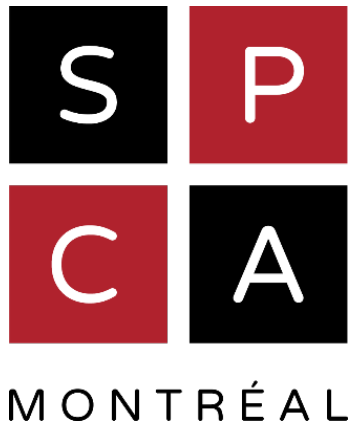


# Detailed recommendations for better oversight of the sled dog industry in Quebec

November 2024



In order to address systemic animal welfare issues within the sled dog industry, the Montreal SPCA believes that the provincial government must put in place a specific regulatory framework for this industry by enacting mandatory, sector-specific standards of care that would complement the general regulatory requirements currently in place<sup>1</sup>. Furthermore, to ensure that these new mandatory standards translate into a real improvement in the welfare of sled dogs, we consider it critical that they be rigorously enforced as detailed below.

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<sup>1</sup> Currently, sled dog facilities are only subject to the *Regulation Respecting the Welfare and Safety of Domestic Companion Animals and Equines* (RLRQ, c. B-3.1, r. 0.1), which provides a general framework for the treatment of dogs in Quebec. There is no framework specific to the sled dog industry in Quebec, unlike in British Columbia, for example.

## RECOMMENDED MANDATORY STANDARDS:

### Conditions for the keeping of dogs

- Prohibition of tethering as the primary housing method<sup>2</sup>.
- Group housing for compatible animals (maximum of 6 dogs per group<sup>3</sup>).
- Specification of minimum enclosure sizes. These minimum sizes must allow dogs to express species-typical behaviours and maintain adequate social distances, as well as provide adequate space for feeding, resting, urinating and defecating<sup>4</sup>.
- Compliance of the doghouse with the following requirements:
  - o The roof must be insulated<sup>5</sup>;
  - o The floor of the doghouse must be covered with clean, dry litter at least 10 cm thick<sup>6</sup>, such as straw or untreated wood shavings.
  - o A plastic barrel must not be considered a compliant doghouse.

### Food and water

- Dogs must not be fed meat that is spoiled or unfit for consumption<sup>7</sup>.
- Access to liquid water at all times<sup>8</sup>.

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<sup>2</sup> The *Regulation Respecting the Welfare and Safety of Domestic Companion Animals and Equines* (*ibid.*) currently allows a dog to be kept chained 23 hours a day. Tethering is prohibited as a primary confinement method in the Canadian Veterinary Medical Association's *Code of Practice for Canadian Kennel Operations* (2018) (p. 9).

<sup>3</sup> This is the maximum number recommended in the *Sled Dog Code of Practice*, published by the British Columbia government (2012, p. 10).

<sup>4</sup> Ontario regulations enacted under the *Provincial Animal Welfare Services Act, 2019* (S.O. 2019, c. 13) set minimum sizes for dog enclosures (*Standards of Care and Administrative Requirements*, Ontario Regulation 444/19, s. 4.4).

<sup>5</sup> Mandatory in Ontario (*Standards of Care and Administrative Requirements, ibid.* s. 4.2(1)(c)).

<sup>6</sup> Mandatory in Ontario (*Standards of Care and Administrative Requirements, ibid.* s. 4.2(1)(h)).

<sup>7</sup> In Ontario, dogs must be fed meat that is fit for consumption and not spoiled (*Standards of Care and Administrative Requirements, ibid.*, s. 4.1(3)).

<sup>8</sup> Mandatory in Ontario (*Standards of Care and Administrative Requirements, ibid.*, s. 4.1(4)).

## Care

- Minimum daily care time of 30 minutes per dog<sup>9</sup>.
- Daily check-up of each animal's health and well-being, including a Body Condition Score (BCS) assessment by palpation<sup>10</sup>.
- Mandatory veterinary consultation if the BCS is below 3 or above 7<sup>11</sup>.
- Mandatory working relationship with a veterinarian<sup>12</sup>.
- Complete veterinary examination, including dental examination, for each dog, at least annually<sup>13</sup>.
- Mandatory annual vaccination and regular parasite control for all dogs<sup>14</sup>.

## Management of breeding

- A maximum of 50 animals per person or facility<sup>15</sup>.
- Systematic sterilization of dogs not intended for breeding<sup>16</sup>.

## Retirement program

- Retirement program to place retired dogs in adoptive homes. The placement program should not depend on shelters or animal rescue organizations, which are already oversaturated in Quebec.
- Obligation to find an adoptive home before considering euthanasia, and to document the steps taken<sup>17</sup>.

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<sup>9</sup> 15 minutes per dog is the minimum required by the *Code of Practice for Canadian Kennel Operations* (*supra*, note 2, p. 34).

<sup>10</sup> Mandatory in Ontario (*Standards of Care and Administrative Requirements*, *supra*, note 4, s. 4.1(5)); recommended in the *Mush with P.R.I.D.E Sled Dog Care Guidelines* (Revision 4-2, 2021, p. 62-63).

<sup>11</sup> Mandatory in British Columbia (*Sled Dog Standards of Care Regulation*, B.C. Reg. 21/2012, s. 13(2)); recommended in *Mush with P.R.I.D.E Sled Dog Care Guidelines* (*ibid.*, p. 63).

<sup>12</sup> Recommended in the *Sled Dog Code of Practice* (*supra* note 3, p. 10) and the *Mush with P.R.I.D.E Sled Dog Care Guidelines* (*ibid.*, p. 58).

<sup>13</sup> Recommended in the *Sled Dog Code of Practice* (*supra* note 3, p. 10) and the *Mush with P.R.I.D.E Sled Dog Care Guidelines* (*ibid.*, p. 70).

<sup>14</sup> Recommended in the *Sled Dog Code of Practice* (*supra* note 3, pp. 10-11) and the *Mush with P.R.I.D.E Sled Dog Care Guidelines* (*ibid.*, pp. 68-69).

<sup>15</sup> The *Regulation Respecting the Welfare and Safety of Domestic Companion Animals and Equines* (*supra*, note 1) sets a maximum limit of 50 animals per facility only for commercial breeders; no limit is imposed on sled dog facilities that do not practice commercial breeding.

<sup>16</sup> Recommended in the *Sled Dog Code of Practice* (*supra* note 3, p. 15).

<sup>17</sup> Mandatory in British Columbia (*Sled Dog Standards of Care Regulation*, *supra*, note 11, s. 21).

- Creation of a life-cycle plan for each dog, including the following components<sup>18</sup> :
  - o Principal activity for which the dog is kept and suitability for this activity;
  - o Annual budget for care, covering such costs as housing, feeding, grooming, socialization activities, health care, sterilization, training, equipment, retirement placement and euthanasia, if applicable. The budget must be updated annually;
  - o Socialization plan that is adapted to the dog's needs through all stages of life (puppyhood to retirement age);
  - o If the dog is intended for breeding, reasons for breeding and a plan to manage breeding to avoid unwanted litters;
  - o If the dog is not intended for breeding, plan for sterilization;
  - o Retirement plan and measures taken to ensure the dog is placed in an adoptive home.

#### Exercise, enrichment and socialization

- Establishment of an exercise program, including for the summer season.
- Establishment of an enrichment program.
- Establishment of a socialization program that meets the dogs' needs, reduces the risk of developing behavioural problems and promotes adoptability, i.e., maximizes the chances of successful adoption in a home upon retirement<sup>19</sup>.

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<sup>18</sup> In British Columbia, sled dog facilities must find adoptive homes for each retired dog before considering euthanasia, and must document their efforts to do so (*Sled Dog Standards of Care Regulation, supra*, note 11, s. 23).

<sup>19</sup> Recommended in the *Sled Dog Code of Practice (supra*, note 3., p. 20).

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### Training, equipment and working conditions

- Prohibition on using training methods that cause dogs fear or pain<sup>20</sup>.
- Harnesses and other equipment must be properly designed and adjusted to ensure comfort and prevent injury<sup>21</sup>.
- Prohibition on dragging or otherwise forcing a dog to work who does not seem willing to work<sup>22</sup>.
- Prohibition on working a dog in situations where they are likely to suffer from hypothermia, hyperthermia, frostbite, dehydration or any other illness or injury caused by adverse weather conditions<sup>23</sup>.
- Prohibition on working a dog suffering from an illness or injury, except in accordance with the instructions of a veterinarian<sup>24</sup>.
- Prohibition on administering or causing to be administered to a dog any drug or substance of any kind, including analgesics and anti-inflammatories, for the purpose of improving the dog's performance or making them work beyond their natural capabilities<sup>25</sup>.

### Records, plans and protocols

- The following information must be recorded for each dog<sup>26</sup>:
  - o information relating to health and veterinary examinations (including annual examinations, vaccination, parasite treatments, any injury or illness, surgery or other medical intervention, and any medication prescribed or administered);
  - o reproductive information (sterilization, mating and whelping);
  - o for deceased dogs, the cause of death and, for dogs who have been euthanized, the reason for euthanasia, as well as any adoption efforts made prior to euthanasia, if applicable.

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<sup>20</sup> Recommended in the *Sled Dog Code of Practice* (*supra*, note 3., p. 30)

<sup>21</sup> Recommended in the *Sled Dog Code of Practice* (*supra*, note 3., p. 32)

<sup>22</sup> Dragging or otherwise forcing a dog to work is prohibited in British Columbia (*Sled Dog Standards of Care Regulation, supra*, note 11, s. 15(1)).

<sup>23</sup> Such a provision exists in the British Columbia regulation (*Sled Dog Standards of Care Regulation, supra*, note 11, s. 15(3)).

<sup>24</sup> Such a provision exists in the British Columbia regulation (*Sled Dog Standards of Care Regulation, supra*, note 11, s. 16(1)).

<sup>25</sup> Such a provision exists in the British Columbia regulation (*Sled Dog Standards of Care Regulation, supra*, note 11, s. 16(2)).

<sup>26</sup> Mandatory in British Columbia (*Sled Dog Standards of Care Regulation, supra*, note 11, ss. 21(2), 22).

- Establishment, in conjunction with the facility's veterinarian, of a health management plan that includes the following components<sup>27</sup>:
  - annual veterinary examination plan, including dental examination;
  - vaccination and parasite control protocols;
  - protocols for health monitoring and detection of disease and injury;
  - sterilization plan;
  - breeding plan;
  - socialization protocol;
  - plan for end-of-life decisions, including a plan for euthanasia, along with a plan for emergency euthanasia;
  - emergency plan, including an evacuation plan in the event of a natural disaster.

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<sup>27</sup> Recommended in the *Sled Dog Code of Practice* (*supra*, note 3, p. 32).

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**RECOMMENDED ENFORCEMENT POLICY:**

- Increase in the frequency of inspections: Sled dog facilities should be subject to several unannounced inspections per year, including at least one visit during the summer season.
- Use of the license as a coercive tool<sup>28</sup> : the obtainment, renewal and validity of a license should be conditional on compliance with the mandatory standards. In the event of non-compliance, the license should be suspended or revoked.
- Removal of animals from the premises should be prioritized when their welfare is at risk: the gradation of coercive measures should be reviewed so that animals can be promptly seized when their welfare is jeopardized.

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<sup>28</sup> The *Animal Welfare and Safety Act* (RLRQ, c. B-3.1) requires a license for anyone having ownership or possession of 15 or more dogs (s. 16).