

Moshe Shalev, MSc, VMD, Column Editor

USDA revises policies on veterinary care and submission of annual reports

In August 2006, the Animal Care (AC) department of the United States Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS) announced revisions of Animal Care Policies #3 and #17. In essence, AC revised Policy #3 to restrict the use of declawing and tooth removal in wild/exotic carnivores or nonhuman primates (NHPs) and changed Policy #17 to stress the importance of providing accurate information in annual reports on animals used for research, experiments, tests, or teaching purposes¹.

Policy #3 revision

To protect handlers and other animals, exotic and wild cats are often declawed in captivity; similarly, NHPs may have their canine teeth removed or cut. These procedures have the potential to cause pain, discomfort, and chronic health problems. To address this, the revision of Policy #3 released on 18 August 2006 now no longer considers declawing or removal of the canine teeth in wild/exotic carnivores or NHPs to be appropriate veterinary care. The revised policy forbids Attending Veterinarians from performing these procedures unless warranted by specific medical conditions of the paws or teeth, or when the procedure is required as part of IACUC-approved research^{2,3}.

The newly revised policy applies to regulated NHPs and captive wild/exotic carnivores, including big cats, canid species, and bears kept by Animal Welfare Act (AWA) licensees. The policy change is in line with the American Veterinary Medical Association's stated position on this issue⁴.

Policy #17 revision

The AWA and Animal Welfare Regulations require research facilities to submit an annual report (APHIS Forms 7023 and 7023-A)

to the responsible AC regional office by 1 December of each year⁵. The revised Policy #17 now requires each research facility to "certify that the animal usage information submitted is true, correct and complete⁵." Further, it recommends "[t]hat every facility develop an animal accounting method sufficient to support this submission⁵," asserting that "USDA inspectors will verify the accuracy of these numbers during their inspection⁵."

The revised policy also includes updated information on the distribution process for the annual report form packages and clarifies the instructions for completing the APHIS forms and optional electronic submission process.

Some of the highlights from the revised Policy #17 include detailed explanations for entries in Column E of the APHIS Form 7023. At a minimum, these entries should address the following:

- "A complete description of the procedure(s) producing pain and/or distress in the animal(s). For Federally mandated testing, this explanation should include, as appropriate, the name of the agency and specific reference citation from the Code of Federal Regulations or

other relevant guidelines.

- "A complete explanation for withholding drugs for relieving pain and/or distress. For example, provide scientific justification that such drugs would adversely affect the test/study results, or cite all regulation(s) and/or Federal Agency policies that prohibit the use of these drugs.

- "An optional "Column E Explanation" form is included in the packet. Research facilities may find it useful to complete this form to provide the necessary information⁵."

1. Gipson, C. APHIS Animal Care Stakeholder Update on Revised Policies 3 and 17. <http://www.aphis.usda.gov/ac/stakeholder/stakeholder6.pdf>.
2. USDA APHIS AC. Information Sheet on Declawing and Tooth Removal. (August 2006). http://www.aphis.usda.gov/ac/publications/declaw_tooth.pdf.
3. USDA APHIS AC. Animal Care Policy #3. Veterinary Care. (18 August 2006). <http://www.aphis.usda.gov/ac/publications/policy/policy3.pdf>.
4. AVMA. Removal or Reduction of Canine Teeth in Captive Nonhuman Primates or Exotic and Wild (Indigenous) Carnivores. (June 2005). http://www.avma.org/issues/policy/animal_welfare/teeth_removal.asp.
5. USDA APHIS AC. Animal Care Policy #17. Annual Report (Revised). (25 August 2006). <http://www.aphis.usda.gov/ac/publications/policy/policy17.pdf>.