

ANIMAL PROCEDURES COMMITTEE

January 2012

**APC COMMENTS: ON OPTIONS FOR TRANSPOSITION OF ANNEX III OF
DIRECTIVE 2010/63/EU - AREAS IN WHICH HIGHER UK STANDARDS
APPLY**

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General comment

The APC believes that higher standards should be maintained in the UK. In reaching this conclusion, we have drawn on evidence specifically related to each issue, as well as principles from the literature on animal behaviour and welfare. This shows that animals benefit from having sufficient space to perform a range of species-specific behaviours, including social behaviour and exercise, and that they benefit from environmental enrichment – which also requires adequate space. All of this makes a strong case for retaining higher standards with respect to enclosure dimensions (with enrichment provided as appropriate). Retaining higher standards might also reassure the public that the UK is committed to good laboratory animal welfare.

Recognition of public concerns about animal care and use is presumably why Lord Henley¹ stated in October 2011 that he could give "an absolute and categorical assurance that we will not be dropping our standards in any way whatever"² and that "the Government are strongly committed to ensuring the best possible standards of animal welfare and protection for animals used in scientific procedures"³. This commitment was repeated by the Home Office Minister, Lynne Featherstone MP, in an adjournment debate in the House of Commons the following month⁴.

On the basis of the literature, and in the spirit of "ensuring the best possible standards", the APC believes that the appropriate course of action is to retain UK standards that are higher. Our species-specific comments are set out in the rest of this document.

Rats

The APC agrees that current UK standards should be maintained, and agrees with the reasoning in the Home Office summary of provisional conclusions.

The Directive requires Member States to ensure that 'any restrictions on the extent to which an animal can satisfy its physiological and ethological needs are kept to a minimum' (Article 33.1b). Rats of all ages frequently rear upright (e.g. Waki et al. 2009, Büttner 1993), so holding them in home cages that do not permit this behaviour would constitute restricting a physiological and ethological need.

¹ The then Parliamentary Under Secretary of State and Government Spokesperson in the House of Lords for the Department for Environment, Food and Rural Affairs

² HL Deb, 4 October 2011, c1013. <http://tinyurl.com/7zkteaa>

³ HL Deb, 24 October 2011, c630. <http://tinyurl.com/79modyx>

⁴ HC Deb, 7 December 2011, c371. <http://tinyurl.com/6shl3o9> all last viewed 30 January 2012

Although large, adult rats will not be able to stand in either 18 or 20 cm, it stands to reason that growing rats will be able to rear upright for longer in a 20 cm cage than an 18 cm one. There is thus a welfare benefit in retaining the higher cage sizes.

Gerbils

The APC disagrees with the recommendation to adopt Annex III cage height and recommends that the current height of 20 cm for breeding animals be retained for gerbils in breeding establishments and on procedures. We agree that the Code of Practice should emphasise the provision of deep litter.

As cited in the Home Office document, Sørensen et al. (2005) recommend that gerbils be housed with at least 18 cm of head room. However, there is also a requirement for deep litter which is not taken into account. If gerbils are to be provided with at least 3 to 5 cm of wood chip litter, which is good practice as recommended by Waiblinger and König (2004), cages will need to be at least 19 to 20 cm high both to accommodate sufficient litter and permit upright rearing.

Hamsters

The APC agrees that current UK standards should be retained. As with rats, the higher standard still does not permit upright rearing in adult animals, which is unacceptable in the view of many members. However, a higher cage will at least allow juvenile animals, who are more active, to rear for longer, so any increment in height is to be preferred.

Rabbits

The APC agrees that current UK standards should be retained.

This is important for both health and welfare reasons; the literature on exercise and bone strength in rabbits clearly justifies the provision of adequate space. In this respect, the higher UK standards for rabbits are still small. For example, they do not compare favourably with the Australian New South Wales guidelines, which have been designed so that rabbits can take at least 3 hops in any direction and state that a minimum area of 2.0 m² be provided, with a minimum length in one direction of 2.0 m. The minimum area in the UK Code of Practice is less than a third of this. The Australian guidelines also point out that adult New Zealand White rabbits have been measured travelling 1.5 to 2.0 m in three 'normal' hops (i.e. when the animal is not startled) (ARRP 2003).

A study on companion rabbits that evaluated behaviour in pens of size 8,800 cm², 16,800 cm² and 33,500 cm² reported that rabbits were more active, and interacted more with resources, in larger pens. There was also a 'rebound effect' in both activity and rearing when rabbits were moved from smaller to larger pens, all of which suggests that smaller pens can jeopardise rabbit welfare (Dixon et al. 2010). Note that the smallest pen in this study was 1.6 times the size of the largest enclosure in the current UK Code of Practice.

Dogs

The APC agrees that current UK standards of a minimum area of 4.5 m² should be retained for users and breeders. However, the APC does not agree with the proposal to allow the provision of 4.0 m² with a platform.

In our view, a space allowance of 4.5 m² (e.g. 2.0 m x 2.25 m) for large, active animals such as dogs is already extremely small, and reducing this by 11 % would be a significant step. This would mean that dogs in user and breeder establishments would have less space than those in UK quarantine kennels (6.9 m²) or boarding kennels (4.67 m²). The logic and fairness of this is highly questionable when one considers that quarantine and boarding kennels are only intended to provide temporary accommodation, whereas dogs may spend years in the laboratory. Stereotypies and other behavioural abnormalities have been observed even in the current UK pen sizes of 4.5 m² (Hubrecht et al. 1992, Hubrecht 1995), which should indicate that reducing this by 11 % would present a significant risk to the welfare of the dogs.

The consultation document correctly states that raised platforms and areas of restricted visibility benefit dogs, but this does not justify reducing the pen space available for the provision of other enrichment and the performance of normal behaviours, including social behaviour. It is true that the Joint Working Group on Refinement report states that pen size should be considered in relation to opportunities to exercise and socialise out of the pen, but this was with at least the legal minimum pen size in mind. To be realistic, most laboratory dogs are never going to spend more than half an hour a day outside their pens (and then not every day), so the fact that they spend relatively short periods out of the pen does not justify confining dogs to very small spaces for the majority of their lives.

Note that the Royal Society/UFAW guidelines that were used as a basis for the original ASPA Code of Practice allowed part of the minimum area to be provided as shelf space for cats, but did not make the same suggestion for dogs. While various guidelines have recommended providing platforms for dogs as enrichment, it is not clear how the platform area ended up becoming included in the total floor space. In practice, a poorly sited platform could end up presenting an impediment for the animals, further reducing the already small pens.

The Home Office consultation document suggests seeking agreement of a binding SOP on social and environmental enrichment. However, this has already been done and was published as Appendix D to the 1998 APC report (APC 1999). This could and should form part of the new Code of Practice for dogs. It could also be argued that it looks odd to set out a binding SOP for good husbandry practices that (i) are supposed to be in place anyway and (ii) should not be traded off against providing basic living space.

Non-human primates

The APC agrees with the proposal to maintain the higher UK standards for marmosets.

Cattle

The APC finds it strange that the proposal is to adopt Annex III trough spaces for *ad lib* feeding, when ‘virtually all’ respondents agreed that higher UK standards should be retained.

The discussion in the consultation document also makes a good case for cattle having adequate trough space so that they can all feed at the same time. As noted in our response to the Codes of Practice, examples of ‘measures to be taken to ensure all animals are able to access sufficient food without either aggression in the feed area or other factors which might effectively reduce the feed intake of animals low in the dominance hierarchy’ are essential in order to decide whether reducing trough space would be acceptable. If these involve purchasing specific designs of trough, or using automated feeders activated by collars with chips, or additional human intervention, it would surely be cheaper simply to provide a longer trough.

Sheep/goats

The APC believes that the current, higher UK standards for enclosure size should be retained. As with dogs, even the ‘high’ UK minimum enclosure sizes are small areas for animals to spend their entire lives in, and the very small EU areas for lambs fly in the face of current thinking about providing proportionately more space for active, juvenile animals. For example, a lamb under 20 kg could have a space allowance of just 100 cm by 70 cm with no mandatory provision for additional exercise. ‘Virtually all’ respondents agreed that the UK Code should be retained where it exceeds Annex III so that is what should happen in our view.

With respect to the trough sizes, our comment is the same as for cattle above.

The APC agrees that the welfare of sheep will be improved without a requirement for partitions.

Pigs/minipigs

The APC’s comments regarding enclosure size, floor area per animal and trough space are the same as for cattle and sheep, above. DEFRA suggests water flow rates (<http://www.defra.gov.uk/publications/files/pb7950-pig-code-030228.pdf> (last viewed 30 January 2012, page 20)).

Equines

The APC believes that the higher UK standards should be retained, regardless of the amount of exercise and grazing provided. The Annex III guidelines do not allow for rolling, an important comfort activity that equines should be able to perform in the stable.

Animal Procedures Committee
31 January 2012

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