

Secretary Proceso J Alcala
Department of Agriculture
Elliptical Road
Quezon City
Philippines

20th April 2011

Dear DA Secretary Alcala,

Re: Use of 'Tambucho' for euthanasia of dogs and cats

I am writing to you on behalf of the World Society for the Protection of Animals (WSPA), the world's largest alliance of animal welfare organisations. Through partnership with more than a thousand organisations we strive to create a world where animal welfare matters and animal cruelty ends. WSPA is committed to improving the animal welfare of companion animals in the Philippines and we are working with our partners, including the Philippine Animal Welfare Society (PAWS), Compassion and Responsibilities for Animals (CARA) and Palawan Animal Welfare Association (PAWAI), as well as the Gates-funded Rabies Elimination project of the Visayas, to advocate for humane methods of euthanasia.

We were very pleased to learn that the use of 'Tambucho' (vehicle exhaust fume-gassing) for euthanasia was recently debated within the Committee for Animal Welfare (CAW) and that on August 24th 2010 the CAW voted in favour of the deletion of 'Tambucho' from the Administrative Order on euthanasia (AO 13, previously AO21).

However, we are disappointed to hear that at the CAW meeting on April 12th 2011, the issue was brought up for voting again, and this time the committee voted to retain the use of 'Tambucho' within AO13. We strongly believe that this runs counter to the principles of AO13.

In the AO13, 'euthanasia' is defined as "*the process inducing humane and painless death to animals*", and the general principles of euthanasia under Section 5 states that "*killing shall be done through humane procedures at all times which shall mean the use of the most scientific methods available as may be determined and approved by the Committee on Animal Welfare.*"

The use of 'Tambucho', which allows the use of gasoline-powered engines as the source of carbon monoxide, is against the principles mentioned above and all internationally acceptable definitions of 'humane'. In WSPA's document 'Methods for the Euthanasia of Dogs and Cats', euthanasia through inhalation of carbon monoxide (CO) is not an acceptable method for the following reasons:

- It is slow acting.
- The highly variable time taken to lose consciousness and can take up to two minutes at 6% concentration
- Death by hypoxia.
- Vocalisations and agitation observed in dogs and this may occur while they are still conscious.
- Distressing side effects observed in cats during induction.
- Animals <4 months of age and sick or injured animals may have some resistance to hypoxia caused by exposure to CO.
- Requires specially constructed chambers that are diligently maintained and are operated to safeguard animal welfare and human safety.
- Requires a pure source of CO such as cylinder gas.
- Sufficient animal welfare and human safety concerns that this method cannot be recommended for euthanasia.

Our document further states that carbon monoxide from exhaust fumes from petrol engines is not acceptable for euthanasia due to the reasons mentioned above, and, in addition, because the fumes are hot and contain irritant impurities. This document is attached for your reference.

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There are several other international euthanasia guidelines which oppose the use of exhaust fumes as a source of carbon monoxide for euthanasia purposes. These include the guidelines by the American Veterinary Medical Association (AVMA) and the World Organisation for Animal Health (OIE), of which the Philippines are an active member.

We therefore respectfully appeal to you to accept the decision of the CAW on August 24th 2010 to remove the 'Tambucho' as an acceptable euthanasia method or consider a moratorium for its implementation and in so doing uphold the purpose of the Animal Welfare Act of 1998, and its stated aim in Section 1 *"to protect and promote the welfare of all animals in the Philippines..."*

Thank you for your consideration.

Yours sincerely,



Dr Kevin Vang
Director
WSPA South and Southeast Asia

c.c.

PAWS
CARA
PETA-Asia Pacific
PAWAI

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