



President of the Republic of Kazakhstan Kassym-Jomart K. Tokayev Executive Office of the President Mangilik Yel st. 6 Astana City Kazakhstan

Thursday, 27th of February 2025

Management of stray animals in Kazakhstan - Considerations on amending the law

Dear Mr. President,

As representatives of major animal welfare organizations and on behalf of several million animal rights activists in Europe, please allow us to address you with an important animal welfare issue.

We are concerned about the current considerations¹ to change the handling of stray animals, especially dogs, in Kazakhstan. Not only is any responsibility for pet owners, who hand over their animals or their offspring to animal shelters to be abolished and the rabies vaccination for stray animals to be waived. But in addition, stray animals are to be caught and allowed to be killed after a period of 15 days. We urge you to prevent this change in the law which would cause a significant deterioration in the situation for stray animals in Kazakhstan! Therefore, we would like to outline scientific evidence in line with our own experience of sustainable and animal welfare-friendly methods in dog and cat population management.

The only sustainable and humane method for solving the problem of stray animals is the principle of "trap, neuter, vaccinate, release". Every habitat provides the resources for a certain number of animals of the same species (the so-called "holding capacity"). The size of a population relies directly on how many resources (food, water, shelter) are available to the animals on the street. These external factors can hardly be influenced and an equilibrium (steady state) is established within the respective habitat: The available resources determine how many animals survive in an area. If animals migrate or are removed from the population, the remaining resources are used by newborn or migrating animals. Therefore, the size of the stray animal population remains the same. By removing animals in order to place them in new households, take them into shelters, euthanize them or send them abroad, humans interfere with this balance.

Due to the fact that it is not possible to catch all dogs from the street and because the animals, that are still free-roaming reproduce unhindered, caught animals are replaced by new ones. These animals have a good chance of survival as they can find sufficient water, food and shelter that were previously occupied by the now partially captured stray population. Dogs that have been abandoned or have previously lived elsewhere also migrate into the area until the original number of animals (holding capacity) is reached

¹ https://mazhilis.parlam.kz/ru/all-bill/539 , retrieved on 30.01.2025

again. For these reasons, capturing the stray dogs would be a continuous endeavor that cannot lead to a solution regarding the stray animal problem. This also explains why capturing and killing operations, which are still common in many countries today, are not only cruel but also ineffective. We would also like to quote the Global Alliance for Rabies Control (GARC) at this point "Culling has been irrevocably shown through robust scientific evidence to be entirely ineffective at sustainably managing the dog population. Furthermore, culling is not only ineffective as a means to eliminate rabies but can in fact, make the disease situation worse."

Furthermore, the main cause of the problem are unneutered pets that free-roam or are abandoned and thus contribute to the reproduction of animals living on the streets.

The following measures (for dogs and cats) should therefore be taken to solve the problem in the only way that is sustainable and in line with animal welfare, using the principle of trap, neuter, vaccinate and release (TNVR):

1. Long-term reduction of the stray animal population through TNVR. Optical identification of neutered dogs by means of ear clips (for cats e.g. ear notches or tattoos)

2. Setting up fixed feeding stations

3. Implementation of mandatory neutering, identification and registration of pets through subsidized state neutering programs conducted by practicing veterinarians. Changing the function of current animal shelters away from simply sheltering animals and towards neutering animals with the aim of releasing them back into the wild or placing them via adoption.

According to our experience and scientific studies, the measures listed here have proven effective many times over. We have compiled an overview of our own successes with TNVR programs and the scientific evidence in the appendix.

Therefore, we call on the Republic of Kazakhstan to use the intentions to amend the legislation as a basis for implementing a sustainable and animal welfare-oriented solution to the street animal problem in Kazakhstan in line with the measures described above. A change in the law to the detriment of an animal welfare friendly dog population management in Kazahkstan would also have far-reaching negative influence on the external perception of the country. In the interests of all stray animals, we we ask you to act in your position as President of the Republic of Kazahkstan to stop the proposed change in the law.

We are at your disposal for further questions or technical support at any time.

On behalf of all organisations and in the hope of your support in this important matter, we remain sincerely yours

Thomas Allriche

Thomas Schröder President, German Animal Welfare Federation

Appendix: Overview of the TNVR principle's own and scientific successes

Successes of the "trap, neuter, release" principle

- In Pitesti (Romania), the number of street dogs was reduced from over 30,000 animals to 4,000 over the period 2007-2013 through 20,058 castrations in the Smeura of Tierhilfe Hoffnung e.V. (Animal Aid Hope).
- In the Odessa Animal Welfare Center (Ukraine) of the German Animal Welfare Federation, the stray dog population was reduced from the original 70,000-80,000 (2005) animals to around 3,000-4,000 (2019) within around 15 years.
- Lega pro Animale (Italy) has been able to sustainably solve stray animal problems with trapneuter-release (TNR) through several projects in cities and municipalities of different sizes around and in Naples, e.g.

 \rightarrow Work of Lega pro Animale in and around Naples: Around 5,000 dogs were killed in Naples every year without solving the street animal problem. After a change in the law in 1991, it became illegal to kill healthy and friendly dogs. From 1994, Lega pro Animale stepped up its work to trap, neuter and release dogs. As a result, the number of dogs in the animal welfare center was greatly reduced, so that from the previous 500 dogs, only 70-80 dogs are now kept in the center on average.

- Study by Rinzin², 2015 Bhutan (Asia): In 2009, a program to trap, neuter, vaccinate and release (TNVR) stray dogs was launched in Bhutan. By 2015, 65,000 dogs had been neutered and vaccinated. At the same time, the population was educated. More people felt safer knowing that dogs with a notch in their ear were vaccinated against rabies and neutered. Since the introduction of the program, the number of deaths from rabies in humans has decreased and the number of animals infected with rabies has also fallen. The number of conflicts between dogs and humans has also decreased due to better interaction, which in turn has improved the relationship between humans and dogs.
- WSPA-PSPCA study³, Stray dog and cat control practices in Europe, 2007: the management of stray dog populations was assessed in several countries. It was found that a combination of neutering, owner education, animal identification and cooperation between associations and authorities had a positive effect on controlling the stray dog population in the UK. In Switzerland and Sweden, the problems do not occur to the same extent due to strict legislation, and in Slovenia the problem is not the same as in other countries due to legislation and the low demand for dogs.

There are also many other projects and studies that underpin the success of TNVR.

² Rinzin, K. (2015): "Population dynamics and health status of free-roaming dogs in Bhutan", PhD thesis, Murdoch Universi-ty, <u>https://researchrepository.murdoch.edu.au/id/eprint/27867/</u>, status: 06.07.2020 ³ WSPA, RSPCA (2007): "Stray Animal Control Practices (Europe). A report into te strategies for controlling stray dog and cat populations adopted in thirty-one countries", <u>http://www.stray-afp.org/nl/wpcontent/uploads/2012/09/WSPA-RSPCA-International-stray-control-practices-in-Europe-2006-2007.pdf</u>, status: 06.07.2020