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November 15, 2010

Bryan Poynter, Chairman The Indiana Natural Resources Commission Indiana Government Center North 100 North Senate Avenue, Room N501 Indianapolis, Indiana 46204

Dear Chairman Poynter:

The undersigned licensed Indiana veterinarians urge the Natural Resources Commission to vote down the proposal to regulate fox and coyote pens in Indiana. The proposed regulations will not allow for proper welfare of the penned wildlife and some of the provisions requiring veterinary care are simply unethical for a veterinarian to perform. From a care and suffering standpoint, the ethical choice is not to subject wildlife to fox and coyote pens in the first place.

However well intentioned, requiring veterinary care for penned foxes and coyotes is impractical. Due to their natural stress responses, wild animals require special handling for care. A very limited number of veterinarians will be able and willing to appropriately handle these animals. Bite wounds in particular are very difficult to heal. The wounds require daily treatments for which a wild animal would need to be sedated. It is unlikely that due to the level of care required and the cost of doing so, that any injured animal will receive proper care. These regulations are also unenforceable, as a Department of Natural Resources officer would have to be present in each pen constantly to obtain basic understanding of compliance.

Finally, requiring that the foxes and coyotes be spayed and neutered prior to being placed in the pen is entirely inappropriate and unethical from a veterinary stand point. First, this regulation will not remove the threat of spreading wildlife disease and will not allow law enforcement to monitor the number of wildlife within the pen. Artificially stocking animals in high numbers in an enclosed area, subjecting them to constant stress through dog pursuit and hand-feeding them are ideal conditions for the spread of wildlife disease. Additionally, an officer already may not ascertain the source and number of animals within the pen unless constantly present to monitor animal stockings.

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Spaying or neutering an animal is a major surgical procedure, which requires general anesthesia and consistent post-operative care. Most veterinarians would consider putting a wild animal through this stress to be entirely inappropriate. Subjecting these animals to a major surgery and returning them to an individual who will immediately put them in an outdoor, fenced area to be pursued by dogs would be contrary to the ethics of our profession, and quite frankly nothing less than disturbing to most. Additionally, because these are wild animals, many of the animals would simply not survive the stress and trauma of the transport, procedure and post-operative recovery.

We urge the Natural Resources Commission to abandon this impractical and unethical rule proposal to regulate fox and coyote pens.

Sincerely,

Dr. Janet Houghton, past Chairman of the Board, Indiana Veterinary Medical Association

Dr. Jeryce Boucher

Dr. Lauren Bowling

Dr. Shari Hughes

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Dr. Rachael Jones

Dr. Christopher Keeley

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