



Draft Small Mammal codes of practice in the ACT

- Code of Practice for the Keeping and Breeding of Ferrets in the ACT
- Code of Practice for the Keeping and Breeding of Guinea Pigs in the ACT
- Code of Practice for the Keeping and Breeding of Rabbits in the ACT
- Code of Practice for the Keeping and Breeding of Rats and Mice (Rodents) in the ACT

Submission of the
Australian Veterinary Association Ltd

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The Australian Veterinary Association (AVA)

The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. The AVA consists of members who come from all fields within the veterinary profession. Clinical practitioners work with companion animals, horses, farm animals, such as cattle and sheep, and wildlife. Government veterinarians work with our animal health, public health and quarantine systems while other members work in industry for pharmaceutical and other commercial enterprises. We have members who work in research and teaching in a range of scientific disciplines. Veterinary students are also members of the Association.

The AVA thanks the ACT Animal Welfare Advisory Committee (AWAC) for the opportunity to provide comment on four newly proposed Small Mammal Codes of Practice including:

- the Keeping and Breeding of Ferrets in the ACT;
- the Keeping and Breeding of Guinea Pigs in the ACT;
- the Keeping and Breeding of Rabbits in the ACT; and
- the Keeping and Breeding of Rats and Mice (Rodents) in the ACT.

We note the committee aims that the newly proposed codes address an identified gap in the current legislation and supporting instruments and that the outcomes of consultation with stakeholders will help inform the Committee's review of the Small Mammal Codes of Practice.

The AVA has consulted with the [ACT Division Committee](#) and the [Unusual Pet and Avian Veterinarians \(UPAV\) Executive Committee](#) to seek expert member input to inform this submission on the proposed new Small Mammal Code of Practice (CoP). Members of the AVA ACT Division Committee and the UPAV Executive Committee who have extensive expertise and experience in this area have been the contributors to this feedback.

The AVA feedback has been structured in the following way, the grey boxes are the proposed wording for the CoP and AVA comments related to that specific wording is immediately below in the white boxes.



AVA Comments:

Code of Practice for the Keeping and Breeding of Ferrets in the ACT

<p>1. General guidelines</p>	<p>The <i>Code of Practice for the Sale of Animals in the ACT other than Stock and Commercial Scale Poultry (2021)</i> requires that a person rehoming an animal, whether by sale or otherwise, must provide the new owner with relevant information on the care of the animal rehomed.</p>
<p>Clarification required: That the above is observed in the breach rather than by compliance, with little regulation.</p>	
<p>2. Environment and housing Mandatory standards</p>	<p>S2.2 - Ferrets do not have well-developed sweat glands, and can experience heat stress and exhaustion. To avoid heat stress and exhaustion, ferrets must be kept in a cool area and must not be exposed to high temperatures. It is recommended ferrets are maintained in the temperature range of 15 °C to 24 °C.</p>
<p>Suggest that as the section in yellow is explanatory it should not be in the mandatory standards. Suggest: Escape proof housing should be in mandatory standards to protect wildlife and the ferret from harm.</p>	
<p>2. Environment and housing Guidelines</p>	<p>G2.4 Ferrets require daily exercise. Ferrets living in a small hutch should have access to an exercise area that is safe and can be left in for at least two hours each day. If ferrets roam in the house or backyard they must be supervised as they can chew and swallow hazardous objects.</p>
<p>Suggest rewording to: Ferrets require daily exercise. Ferrets living in a small hutch should have access to an exercise area that is safe and in which they can be left for at least two hours each day. If ferrets roam in the house or backyard they must be supervised to prevent them chewing and swallowing hazardous objects.</p>	
<p>2. Environment and housing Guidelines</p>	<p>G2.5 If you have more than one ferret, which is recommended, then you need to factor that in when deciding on the appropriate size of the enclosure. The recommended minimum size is 2m² or more. This will accommodate two (2) ferrets. The enclosure should also allow the ferret to reach up to the full length of their body and climb. A larger cage is recommended wherever possible.</p>
<p>Suggest rewording to: If you have more than one ferret, which is recommended, then you need to meet social needs and to provide stimulation and to factor that that in when deciding on the appropriate size of the enclosure. The recommended minimum size is 2m² or more. This will accommodate two (2) ferrets. The enclosure should also allow the ferret to reach up to the full length of their body and climb. A larger cage is recommended wherever possible.</p> <p>OR</p> <p>Ferrets need social contact and stimulation, and therefore it is recommended to keep at least two, compatible, ferrets. An enclosure for two ferrets should be at least 2 m² and be tall enough that they can reach to their full body length, and climb. Larger cages are required to house more than two ferrets, and are preferable for smaller numbers.</p>	
<p>2. Environment and housing Guidelines</p>	<p>G2.11 Ferrets benefit from a normal day/night cycle and can be stressed if kept in an area which is continually exposed to light conditions. Ferrets also prefer having areas where they can hide in low light which will minimise stress.</p>
<p>It would be worth stating that ferrets are crepuscular, so that new owners have a reasonable expectation of their times of activity and rest, and meet the ferrets needs in respect of this.</p>	



<p>3. Handling</p>	<p>S3.4 Ferrets must never be tethered. This means not securing an animal to an object or running line by means of a leash, chain, rope or other material. An animal fighting against a fixed tether can suffer serious injuries that can result in death.</p>
<p>Should have a note to say tethering is not harness and lead walking with an owner.</p>	
<p>3. Handling</p>	<p>How to handle a ferret: Ferrets benefit from regular and confident (gentle but firm) handling. It is important to handle ferrets often, especially when they are young. The best way to pick up a ferret is to hold them around and under their front shoulders, while supporting their hind legs with the other hand.</p>
<p>As opposed to their "back shoulders" - needs rewording. Suggest: Ferrets should be picked up with two hands one under the chest with the fingers and thumb enclosing the front legs, and once supporting the hind quarters</p>	
<p>3. Handling Guidelines</p>	<p>G3.3 - Ferrets should be allowed to familiarise themselves with any new experience or environment. They should also be socialised with other ferrets, ideally of the same litter (see environment and housing) and humans when it is safe to do so. <i>Note: Family, friends and children may need to be shown how to interact and properly handle ferrets.</i></p>
<p>"of the same litter" is not mentioned in environment and housing - these should be structured better. Suggest that the note section would be better stated as all visitors must/should be instructed in and supervised while interacting with and handling ferrets.</p>	
<p>4. Hygiene</p>	<p>Hygiene is important for the health of your ferret and you as the owner/carer. Ferrets can harbour disease that can be passed onto humans and other animals, so it is important to maintain high levels of hygiene to minimise the risk of disease.</p>
<p>Introduction should advise that ferrets are also at risk of disease, particularly respiratory diseases, from humans not just the ferrets giving diseases to humans.</p>	
<p>4. Hygiene Mandatory standards</p>	<p>S4.1 (a) Regularly washing the ferret's food and water bowls;</p>
<p>Need to be more specific about how often.</p>	
<p>4. Hygiene Mandatory standards</p>	<p>S4.2 A person responsible for a ferret must properly groom and maintain the ferret.</p>
<p>How do you maintain a ferret? Suggest rewording to: A person responsible for a ferret must properly groom and maintain the hygiene /cleanliness of the ferret.</p>	



<p>4. Hygiene Guidelines</p>	<p>G4.5 Cleaning and disinfecting agents should be chosen on the basis of their suitability, safety and effectiveness. Bleach or chlorine-based disinfectants are effective against common ferret pathogens. Manufacturers' instructions for the use of cleaning and disinfecting agents should be followed, overly diluted a solution may be ineffective and too concentrated a solution may be toxic to animals. All disinfectants should be thoroughly rinsed away with water following application.</p>
<p>Can this be changed to "An overly dilute" or "overly diluting a"</p>	
<p>4. Hygiene Guidelines</p>	<p>G4.7 Litter trays should be large enough for the ferret to turn around comfortably, have sides low enough for the ferret to easily hop in and out and a minimum of 5 centimetres of litter.</p>
<p>Suggest rewording to: Should be easy to enter and exit, allow the ferret to turn around, and contain at least 5 cm depth of litter.</p>	
<p>4. Hygiene Guidelines</p>	<p>G4.10 Substrate should be completely changed at least weekly, ideally after the cage has been washed. If stocking density is high then more regular replacement will be required. Higher quality substrate allows ferrets to turn over the litter so that the top remains dry and the soiled moist bedding is underneath.</p>
<p>Specify this means cage substrate, not litter.</p> <p>When the cage is washed (don't wash the cage then change the substrate - they must happen together).</p>	
<p>4. Hygiene Guidelines</p>	<p>G4.12 If substrate or nesting material becomes wet i.e. from a leaky water container, it must be replaced quickly to minimise the risk of the ferrets suffering from hyperthermia and mould growing in the cage.</p>
<p>Clarification required: Do you mean hypothermia due to wet bedding? Or hyperthermia due to excess humidity?</p>	
<p>4. Hygiene Guidelines</p>	<p>G4.13 Soiled cage bases should be cleaned separately from water and food containers.</p>
<p>This is already stated in G4.8, and perhaps would be better combined into a single statement/recommendation.</p>	
<p>5. Nutrition Guidelines</p>	<p>G5.1 Ferrets are obligatory carnivores, which means they eat only meat. Specially formulated commercial ferret dry and wet food is available.</p>
<p>Guidelines should include a point to say that raw food diets must be very carefully balanced as they are often deficient in some nutrients and too high in others and advice should be sort from an appropriately trained veterinarian or nutritionist.</p> <p>Don't believe a specially formulated commercial ferret wet food exists in Australia (non-raw/small scale)</p>	



<p>5. Nutrition Guidelines</p>	<p>G5.2 The amount of food a ferret consumes and the ferret's body condition should be monitored to ensure the ferret is neither overeating nor undereating.</p>
<p>Suggest rewording: the ferrets body condition (and body weight should be monitored - overweight animals require less food; underweight animals may require more food, but may also need veterinary intervention to diagnose and treat. Owners should also monitor access to food (ensure a bully is not consuming the majority of the food)</p>	
<p>6. Health Mandatory standards</p>	<p>S6.2 A person responsible for a ferret must provide ongoing health care to maintain the good health of the ferret.</p>
<p>New standard -all ferrets must be vaccinated by a veterinarian against Distemper Virus using an appropriate vaccine and dose.</p>	
<p>6. Health Mandatory standards</p>	<p>S6.3 Ferrets can develop conditions with their reproductive system which can be fatal. Female ferrets who are not bred from may develop health concerns related to recurring heat cycles (hyperoestrogenism). For this reason, non-breeding female ferrets must be desexed at a young age.</p>
<p>We feel that this is a little too specific when there are various options for "desexing" ferrets and a blanket desexing from a young age Mandatory standard is an issue.</p> <p>Suggest replacing with - "all female ferrets must be desexed or have their reproductive cycles managed in conjunction with a veterinarian."</p> <p>Hormone implants are used for ferrets who would never be bred but are using these instead of desexing to try to reduce the risk of desexing related diseases.</p> <p>New Standard - Ferrets must not have their anal sacs removed unless because of infection or tumour.</p>	
<p>6. Health Guidelines</p>	<p>G6.4 Ferrets should be desexed around 6 months of age. Ferrets who are desexed will not produce unwanted litters, are less aggressive and have a milder scent.</p>
<p>The old guidelines are out of date as newer, reliable hormone contraception implants are available. Can add Deslorelin implants into the reliable section. Or if aiming to keep the act usable into the future as more research is done, I would leave the specifics of reliable or not out and advise to discuss with an experienced veterinarian.</p>	
<p>7. Behavioural and Social interactions Mandatory standards</p>	<p>Additional point to be added.</p>
<p>Should include a point to state that humans with respiratory infections should put extra hygiene practices in place to avoid infecting the ferret such as hand washing and wearing masks.</p>	
<p>7. Behavioural and social interactions Guidelines</p>	<p>G7.4 Males will be less likely to fight each other if introduced at a young age. Females and males can be prone to fighting amongst each other so make sure you accustom new ferrets</p>



	with each other in a supervised environment or through a mesh fence before they live together.
<p>"amongst each other "is not necessary. Suggest new sentence - Ferrets being introduced must be supervised carefully and separated when direct supervision is not possible. Advice on socialising (helping animals become accustomed to each other) should be sought from a veterinarian or experienced ferret keeper.</p>	
8. Identification, lost and unwanted ferrets	Mandatory standards
Suggest microchipping of ferrets should be mandatory.	
8. Identification, lost and unwanted ferrets Guidelines	G8.1 Ferrets should be micro-chipped by a suitably qualified person such as a veterinarian specialising in the care of ferrets. Details of the microchip should be registered on the relevant database.
<p>It is problematic to use the phrase "specialising in" as the word "specialist" has a legal meaning of someone recognised by a State or Territory Veterinary Practitioner's Board as a Specialist in a certain field. While the phrase "specialising in" is not the same, it would be preferable to use "experienced in or with" (throughout the document).</p> <p>A relevant database be replaced with - A national microchip database.</p> <p>This should be a "must" statement. Without registration on a database (a national database with ready access by all relevant parties), the microchip is useless.</p>	
8. Identification, lost and unwanted ferrets Guidelines	G8.4 Keepers should provide information about their lost ferret to animal welfare shelters or organisations and private veterinarians in the area.
<p>Include DAS,RSPCA, any ferret rescue groups, and Canberra Lost Pet Database Canberra Lost Pet Database https://www.facebook.com/CanberraLostPetDabase/</p>	
8. Identification, lost and unwanted ferrets Guidelines	G8.5 Persons finding a lost domesticated ferret should attempt to find the usual carer. This could include taking the ferret to a local veterinary practice to be scanned for a microchip and contacting organisations that keepers of lost pets may have already contacted.
How would the finder know who the owner may have tried to contact? Better to list the places the finder should investigate.	
9. Breeding Mandatory standards	<p>S9.2 Potential breeding animals must be:</p> <p>b) not have any known heritable defects such as malocclusion or splayed legs.</p>
Feel that the examples would be better suited under the guidelines.	
9. Breeding Guidelines	<p>G9.1 Potential breeding animals should be:</p> <p>a) Checked by a veterinarian experienced in ferrets for sound health and physical maturity; and</p> <p>b) an appropriate weight to avoid added risks of dystocia,</p> <p>c) vaccinated; and</p> <p>d) wormed.</p>



<p>AVA advice for vaccinating Ferrets Canine distemper vaccine for ferrets 1) Dose: One quarter to one sixth of the canine dose which will vary with the manufacturer of the vaccine. 2) Site: Subcutaneous injection 3) Frequency: 1) 6-12 weeks of age – two doses 4 weeks apart and repeat annually 2) Over 12 weeks of age – single dose and repeat annually https://www.ava.com.au/policy-advocacy/policies/unusual-pets-and-avian/vaccination-of-rabbits-and-ferrets/ Worming is probably not necessary - although round, hook and tapeworms are possible, they are considered rare. Dipylidium caninum may occur if the animal is infested with fleas. Ear mites and fleas are relatively common, and can be managed with topical ecto-parasiticides like Revolution or Advocate under veterinary advice. Ferrets can suffer from protozoal parasites like Coccidia, Giardia, Toxoplasma and Cryptosporidium, some of which can be transmitted to humans or other pets. Sick ferrets should be examined by a veterinarian. https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7152190/ https://pubmed.ncbi.nlm.nih.gov/24768317/</p>	
<p>10. Transport</p>	<p>S10.4 Transportation must be undertaken in the shortest time possible. If transported for longer than six hours, drinking water must be provided in a water vessel securely fixed to the side of the container. If in transport for 12 hours or longer, provision must be made for food to be provided. Animals under the age of three months and pregnant females must not be fasted for more than four hours.</p>
<p>We strongly feel that six hours without drinking water and 12 hours without food is far too long for a ferret and serious complications could arise. We suggest 2 hours without water and 4 hours without food being the maximum.</p>	
<p>10. Transport</p>	<p>Guidelines</p> <p>G10.1 If transporting a ferret, the mode of transport will be determined in part by the distance to be travelled, the familiarity of the animal with travel, and its health status. When transporting a found or injured animal there may not be time or opportunity to follow all the suggestions included in these guidelines.</p> <p>Note: If transporting animals beyond the ACT the owner should check the legislation and requirements of other states and territories. It is illegal to keep ferrets as pets in some Australian states.</p>
<p>For example, Queensland.</p>	
<p>11. Ending a ferret's life</p>	<p>S11.2 If a person responsible for a ferret chooses (in accordance with Standard 11.1) to have the ferret euthanised: a) the person must engage a registered veterinary surgeon.</p>
<p>Suggest rewording to "A ferret may only be euthanised by a registered veterinarian".</p>	



AVA Comments:

Code of Practice for the Keeping and Breeding of Guinea Pigs in the ACT

<p>Introduction</p>	<p>This Code is a mandatory code of practice approved under section 23. Sections 24A and 24B of the Animal Welfare Act 1992 provide that it is an offence to fail to comply with a mandatory code of practice. Compliance with this Code is compulsory for all pet guinea pigs in the ACT. For penalty units see Legislation Act 2001, section 133.</p>
<p>Suggest insert after for: the owners of all pet guinea pigs in the ACT.</p>	
<p>Relation to other Codes</p>	<p>A number of Codes of Practice for animal welfare have been published over time by the ACT Government. Taken together, the Codes create a matrix of animal welfare provisions that provide guidance on most of the acute animal welfare issues in the ACT. The Codes are subject to reviews and updates and additional codes may be developed as industries, technologies, attitudes and best practice animal welfare evolves.</p>
<p>Acute means recent in onset, of immediate import -it refers to time frames. The codes should and do refer to the whole of the animal's life, so acute is not an appropriate word. Suggest replacing with the word "critical", "crucial" or "important".</p>	
<p>Overall welfare objectives</p>	<p>Animal welfare considerations are essential in the keeping of animals. This Code is based on established experience and current scientific knowledge and is open to future review as appropriate. Animal welfare in a modern context describes how an animal is coping both mentally and physically. Achieving good animal welfare relies on recognising the five domains of welfare for animals.</p>
<p>Suggest rewording to: Animal welfare in a modern context describes how well an animal is both mentally and physically . We are aiming for more than 'coping'.</p>	
<p>1. General guidelines</p>	<p><i>The Code of Practice for the Sale of Animals in the ACT other than Stock and Commercial Scale Poultry (2021)</i> requires that a person rehoming an animal, whether by sale or otherwise, must provide the new owner with relevant information on the care of the animal rehomed. In the case of a guinea pig for whom a new home has been found, that information should cover diet, accurate sex of the guinea pig, when to desex, grooming, housing, identification and general health care. Providing this Code to the new carer is advisable.</p>
<p>Suggest adding accurate identification of sex of the guinea pig,</p>	



<p>2. Environment and housing <i>Mandatory standards</i></p>	
<p>Under mandatory standards – Requires a stronger emphasis on having a minimum of 2 guinea pigs. In some countries this is a legal requirement.</p>	
<p>2. Environment and housing <i>Mandatory standards</i></p>	<p>S2.1 e) Safety from predators, this includes not living in close proximity to predators such as dogs and cats.</p>
<p>Suggest rewording to: Safety from both the physical risks and the fear of predators, this includes not living in close proximity to predators such as dogs and cats.</p>	
<p>2. Environment and housing <i>Guidelines</i></p>	<p>G2.7 Guinea pigs may be either housed in outdoor hutches or enclosures, or live indoors where they can be trained to use a litter tray. Litter trays should be lined with wood or paper-based litter; other types can be harmful if ingested by guinea pigs.</p>
<p>Hay and straw are also appropriate litter.</p>	
<p>2. Environment and housing <i>Guidelines</i></p>	<p>G2.8 Sleeping areas, whether indoors or outdoors, should include bedding material in the form of straw or hay with an underlay of absorbent substrate such as wood shavings that is kept clean and dry, and is replaced regularly. Textile style beds such as those used for dogs and cats may not be suitable for guinea pigs as they may chew and eat them, potentially obstructing the gut.</p>
<p>This is not clear - better to say "bedding made of fabric" or similar.</p>	
<p>3. Handling <i>Guidelines</i></p>	<p>G3.2 Some owners may wish to exercise their guinea pig with a harness and a lead. Before taking a guinea pig outdoors or into a public space, the guinea pig should be trained to accept a harness. The lead should be attached to a harness and not to a collar.</p>
<p>Suggest rewording to: The lead should be attached to a harness and collars must not be used.</p>	
<p>4. Hygiene <i>Guidelines</i></p>	<p>G4.1 Regular grooming of guinea pigs assists with the detection of some diseases and parasite problems. Semi-long-haired and longhaired guinea pigs should be groomed twice per week. Shorthaired guinea pigs may need grooming only once per fortnight.</p>
<p>It would be good to provide some brief description of how GPs are groomed -brushing (what kind of brush?), bathing? (with what?)</p>	
<p>4. Hygiene <i>Guidelines</i></p>	<p>G4.7 Litter trays (or toileting area) should be large enough for the guinea pig to turn around comfortably, have sides low enough for the guinea pig to easily hop in and out, and contain a minimum depth of 5 centimetres of litter.</p>



<p>This seems very deep and may cause issues with the height of the litter tray, many GP litter trays are not this tall as the GP couldn't climb over the edge.</p>	
<p>5. Nutrition <i>Mandatory standards</i></p>	<p>S5.3 Guinea pigs must be provided with adequate Vitamin C to maintain good health. Guinea pigs are unable to synthesise vitamin C (ascorbic acid) and require a daily and reliable dietary source of vitamin C. A combination of fresh leafy greens and small amounts of citrus fruit or kiwi fruit each day are reliable sources of vitamin C. Vitamin C supplements placed in drinking water or included in pelleted feeds are less reliable as the vitamin quickly degrades when exposed to organic matter or when it comes into contact with metal.</p>
<p>The list of Vit C containing foods is very small in this. As it is a mandatory section the list should be increased or at least mention that other high vitamin C foods are available.</p> <p>Some of the foods on the do not feed list are incorrect. There is no mention that seed based diets cause illness and should not be fed.</p>	
<p>5. Nutrition <i>Guidelines</i></p>	<p>G5.3 To ensure the guinea pig's gastrointestinal tract remains healthy, a fresh supply of roughage (e.g. meadow hay, oaten or Timothy hay) should always be available and should make up 80-90% of the diet. Preferably roughage should be provided in a suspended net or rack to avoid contamination with urine and faeces. Dry roughage should be provided even when guinea pigs have access to fresh grass.</p>
<p>Grass clippings can be fed but must be fresh (fed same day only) rather than "should not be fed as they ferment".</p> <p>G5.3 and G5.4 and the associated comments have significant overlaps and should be restructured.</p>	
<p>5. Nutrition <i>Guidelines</i></p>	<p>G5.8 A guinea pigs' diet may be supplemented with fresh vegetables such as bok choy, broccoli, parsley, pumpkin, celery, carrot tops and cabbage.</p>
<p>Replace may with should.</p>	
<p>5. Nutrition <i>Guidelines</i></p>	<p>G5.9 Fresh produce can be associated with parasitic and bacterial infections and should be washed prior to feeding.</p>
<p>This statement "can be associated with parasitic and bacterial infections " refers to a low risk in practice and may discourage an owner from using this valuable / necessary resource for GPs. It should be deleted (or moved to a smaller comment/note)</p>	
<p>6. Health <i>Mandatory standards</i></p>	<p>S6.3 Overgrown or broken teeth must be treated by a veterinarian as they may impact upon the guinea pigs ability to feed properly and can cause serious pain.</p>
<p>Suggest rewording to " are highly likely to cause pain and difficulty eating leading to malnutrition and weight loss.</p>	



<p>6. Health Guidelines</p>	<p>G6.2 Guinea pigs should be desexed not only to prevent unwanted offspring but also to reduce stress levels driven by hormones, which make guinea pigs more prone to fighting and displaying other territorial behaviour.</p>
<p>Suggest rewording to: G6.2 Guinea pigs should be desexed not only to prevent unwanted offspring but also to reduce stress associated with high levels of hormones, which make guinea pigs more prone to fighting and displaying other territorial behaviour.</p>	
<p>6. Health Guidelines</p>	<p>G6.4 A guinea pig's teeth, including the incisors (front teeth) and cheek teeth (molars) grow continually and should be checked monthly to ensure they are wearing correctly.</p>
<p>Add an additional sentence: This should be performed by a veterinarian or experienced GP owner until the carer is competent to assess the teeth.</p>	
<p>7. Behavioural and social interactions Guidelines</p>	<p>G7.2 Guinea pigs should equally have time to rest and the opportunity to hide from contact with other animals and people should they choose to do so.</p>
<p>A section should be provided discussing/advising on environmental enrichment - see https://awionline.org/content/environmental-enrichment-guinea-pigs-discussion-laboratory-animal-refinement-enrichment-foru#:~:text=%22Hay%20is%20the%20perfect%20environmental,also%20nibble%20and%20eat%20it Oit AND https://kb.rspca.org.au/knowledge-base/what-exercise-and-environmental-enrichment-do-guinea-pigs-need/#:~:text=Provide%20them%20with%20foraging%20opportunities,things%20like%20ramps%20and%20boxes.</p>	
<p>8. Identification, lost and unwanted guinea pigs Guidelines</p>	<p>G8.1 Guinea pigs should be micro-chipped by a suitably qualified person such as a veterinarian specialising in the care of guinea pigs. Details of the microchip should be registered on the relevant database.</p>
<p>Suggest rewording to: Guinea pigs should be micro-chipped by a veterinarian with knowledge of care of guinea pigs. Details of the microchip should be registered on national database.</p>	
<p>8. Identification, lost and unwanted guinea pigs Guidelines</p>	<p>G8.5 Persons finding a lost domesticated guinea pig should attempt to find the usual carer. This could include taking the guinea pig to a local veterinary practice to be scanned for a microchip and contacting organisations that keepers of lost pets may have already contacted.</p>
<p>How does the finder know who the keeper may have already contacted? Instead, provide examples of shelters (RSPCA, DAS) and, for example, the Canberra Lost Pets database.</p>	
<p>9. Breeding Guidelines</p>	<p>G9.1 Potential breeding animals should: a) be checked by a veterinarian for sound health and physical maturity; and b) not be obese, to avoid added risks of dystocia (difficulty giving birth).</p>
<p>It may be helpful to give definitions of obesity in guinea pigs, see suggestion here: https://www.oxbowaustralia.com/wp-content/uploads/2022/03/Guinea-Pig-Score-Card-2022-Website-Version.pdf</p>	



<p>9. Breeding Guidelines</p>	<p>G9.8 A varied semi-solid diet should be available to pups within hours of birth to ensure they become accustomed to eating a range of food.</p>
<p>Feel that this is unclear, what does this mean for a GP, examples should be provided.</p>	
<p>9. Breeding Guidelines</p>	<p>G9.9 Large open water containers are not ideal for pups as they can drown or become soaked and cold, encouraging pups to use a sipper water bottle is ideal. Ensure it is low enough for pups to reach from birth.</p>
<p>Suggest replacing not ideal with not appropriate.</p>	
<p>9. Breeding Guidelines</p>	<p>G9.12 Allowing sows to mate again soon after birth is not ideal as it does not allow the sow time to recover and improve her condition.</p>
<p>Suggest rewording to: Sows should not be allowed to mate until the pups have been weaned and the sow has regained normal body weight and condition. Keep boars separate until mating is appropriate and planned.</p>	
<p>9. Breeding Guidelines</p>	<p>G9.15 The person in charge is responsible for finding suitable homes for all pups produced by their guinea pigs, including pups of any unintended breeding or pups with no commercial value.</p>
<p>Suggest adding such as the owner of the guinea pigs.</p>	
<p>9. Breeding Guidelines</p>	<p>G9.16 Pups are best raised where they have extensive contact with their carer to ensure that they will be well conditioned as pets. Pups should be trained to use a toilet tray, to accept grooming, to relate to other guinea pigs, and to respond positively to humans. Longhaired and semi-long-haired pups should be groomed daily from 3 weeks of age to accustom them to grooming.</p>
<p>Conditioned refers to body condition. Suggest using socialised instead.</p>	
<p>9. Breeding Guidelines</p>	<p>G9.17 A person should only permanently remove a pup from their mother if the pup has reached 3 weeks of age. This might not apply if the person has veterinary advice recommending the pup be removed before they have reached 3 weeks of age.</p>
<p>Suggest rewording to: A person should only permanently remove a pup from their mother if the pup has reached 3 weeks of age, except under veterinary advice.</p>	
<p>10. Transport Mandatory standards</p>	<p>S10.4 Transportation must be undertaken in the shortest time possible. If transported for longer than one hour, drinking water must be provided in a water vessel securely fixed to the side of the container. If in transport for 12 hours or longer, provision must be made for food to also be provided.</p>
<p>We strongly feel that six hours without drinking water and 12 hours without food is far too long for a GP and serious complications could arise. We suggest 2 hours without water and 4 hours without food being the maximum.</p>	



<p>Suggest adding and additional comment: Sufficient moisture may be provided with soft food such as boiled pumpkin, fruits etc, avoiding spillage of water.</p>	
<p>11. Ending a guinea pig's life Mandatory standards</p>	<p>S11.1 Euthanasia must only occur if justified and with a good reason. A person must not without a good reason choose to have a guinea pig euthanised. This applies to guinea pigs in general, including unwanted guinea pigs and trapped guinea pigs.</p> <p>S11.2 If a person responsible for a guinea pig chooses (in accordance with Standard 10.1) to have the guinea pig euthanised: a) the person must engage a veterinary surgeon; or b) if the guinea pig is in acute and unrelievable pain, and engaging a veterinary surgeon is not practicable or possible, the person may use the most humane means available to end the guinea pig's life.</p>
<p>S11.1 - and with good reason is the same as justified so would remove. S11.2 - If this statement is made, then an appropriate method or methods should be listed.</p>	



AVA Comments:

Code of Practice for the Keeping and Breeding of Rabbits in the ACT

<p>Structure of the Code Guidelines</p>	<p>In this Code of Practice, Guidelines are recommended practices to achieve desirable animal welfare outcomes. The guidelines complement the mandatory standards and should be used as guidance for all owners. Guidelines use the word 'should'. Non-compliance with one or more guidelines will not in itself constitute an offence under law but may be used to help inform decision-makers of what is considered appropriate care in the event of prosecution.</p>
<p>Suggest keeping the use of quotes consistent: used above 'must", used here 'should'.</p>	
<p>Relation to other Codes</p>	<p>A number of Codes of Practice for animal welfare have been published over time by the ACT Government. Taken together, the Codes create a matrix of animal welfare provisions that provide guidance on most of the acute animal welfare issues in the ACT. The Codes are subject to reviews and updates and additional codes may be developed as industries, technologies, attitudes and best practice animal welfare evolves.</p>
<p>Not sure what acute animal welfare issues are. Perhaps the wording could be changed to: primary, pre-eminent, most important, most significant.</p>	
<p>1. General guidelines</p>	<p>Rabbits are considered prey animals and as such will often hide signs of injury or illness so as not to appear weak. Thorough daily checks of an animal's wellbeing and becoming familiar with their normal behaviour is critical in identifying any issues early as changes are often hidden and therefore subtle. It is important that anyone keeping rabbits as pets can identify the signs of fear and distress. Acute signs may include freezing, distress vocalisation, rapid shallow breathing, trembling, biting, scratching and foot thumping and lunging in rabbits. Longer term, fear and distress may manifest into health issues such as weight loss, dehydration, failure to nest, overgrooming, failure to groom, increased aggression towards humans and fighting with other animals in their environment. It is important that the person in charge monitors their animals closely and takes the appropriate action to ensure fear and distress is minimised by: providing safe hiding places, gradual introductions to new people,/ handling, /environments and /cage mates, reducing noise, minimisation and avoiding the sight, smell and sound of potential predator species e.g., keeping cats and dogs away.</p>
<p>Suggested rewording to: Rabbits are considered prey animals and as such will often hide signs of injury or illness so as not to appear vulnerable. Thorough daily checks of an animal's wellbeing and becoming familiar with their normal behaviour is critical in identifying any issues early as changes are often hidden and therefore subtle. It is important that anyone keeping rabbits as pets can identify the signs of fear and distress. Acute signs may include freezing, distress vocalisation, rapid shallow breathing, trembling, biting, scratching and foot thumping and lunging in rabbits.</p>	



<p>Longer term, fear and distress may manifest as health issues such as weight loss, dehydration, failure to nest, overgrooming, failure to groom, increased aggression towards humans and fighting with other animals in their environment. It is important that the person in charge monitors their animals closely and takes the appropriate action to ensure fear and distress is minimised by: providing safe hiding places, gradual introductions to new people, handling, environments and cage mates, reducing noise, and avoiding the sight, smell and sound of potential predator species e.g., cats and dogs.</p> <p>Person in charge - Can this be defined, and / or referred to consistently throughout the document? Also referred to as keeper, carer, owner, etc. throughout the document.</p>	
<p>2. Environment and housing Mandatory standards</p>	<p>S2.1 All rabbits must be provided with a living environment that minimises stress and provides the following: c) Mental stimulation through the provision of enrichment such as varied diet, gnaw blocks, toys and play with a keeper or carer;</p>
<p>Person in charge? See comment above. Should be consistent throughout.</p>	
<p>2. Environment and housing Mandatory standards</p>	<p>S2.2 Rabbits housed outdoors must have protection from extremes of weather including by providing appropriate shade, and shelter, but also allowing access to sun in colder months.</p> <p>S2.3 Rabbits are prone to heat stress; during summer and warmer temperatures enclosures must not be positioned in direct sunlight or in warm areas where they cannot seek respite from the heat. Rabbits must be moved indoors, or extra provision made for managing temperatures in extremely hot or cold conditions.</p>
<p>Suggest rewording to: Rabbits are prone to heat stress. During summer and warmer temperatures enclosures must not be positioned in direct sunlight or in warm areas where rabbits cannot seek respite from the heat. Rabbits must be moved indoors, or extra provision made for managing temperatures in extremely hot or cold conditions.</p>	
<p>2. Environment and housing Guidelines</p>	<p>G2.1 b) Minimise the impact of the rabbit on wildlife and the environment through de-sexing and the implementation of appropriate control and/or containment; and d) Provide a level of hygiene that supports good health and prevents minimises the risk of illness and disease</p>
<p>b) Clarification needed: Does this mean by keeping the rabbit contained appropriately, on the owner's property? (e.g. similar to cats). If so, maybe state this. d) Provide a level of hygiene that supports good health and minimises the risk of illness and disease</p>	
<p>2. Environment and housing Guidelines</p>	<p>G2.3 Unrelated female rabbits or desexed rabbits can be housed together but should be monitored closely to ensure they are not fighting or dominating feeding, hiding and sleeping spaces and ensure they bond with each other.</p>
<p>Suggest this could be reworded: and determining if the rabbits are bonding. The bonding issue is important, so it is worth covering here or in G2.6.</p>	



<p>2. Environment and housing Guidelines</p>	<p>G2.5 Rabbits are social animals, and their wellbeing is greatly increased if they can be housed with other compatible rabbits. Rabbits should not be housed with guinea pigs as rabbits can asymptotically harbour the disease Bordetella bronchiseptica that is potentially fatal to guinea pigs. Rabbits may also physically harm guinea pigs and dominate the living environment. *</p>
<p>Suggest adding – and have different dietary requirements.</p>	
<p>2. Environment and housing Guidelines</p>	<p>G2.11 Rabbits should be given regular opportunity to roam and run freely in large spaces.* If the large space is outside, the area should be escape-proof and protected from predators, or rabbits will need to be supervised. Persons responsible should be mindful that rabbits can dig under fences.</p>
<p>Suggest adding, as described in G2.12.</p>	
<p>2. Environment and housing Guidelines</p>	<p>G2.12 Outdoor enclosures or hutches should be large enough to allow rabbits to stand upright on their hind limbs, turn around while jumping in the air (binky), lie down in a full stretch and perform 10 hops in a straight line. Enclosures should also:</p> <ul style="list-style-type: none"> a) provide an enclosed waterproof area (ideally raised off the ground) with only a small opening, where the rabbit can hide, nest, keep dry, warm or cool; b) be sturdy and secure to protect rabbits from predators such as cats, dogs, foxes and birds; c) prevent escape; and d) be covered with insect proof mesh to protect rabbits from insects that can spread disease to rabbits, such as mosquitos that can infect rabbits with myxomatosis.
<p>10 hops is considerable for a medium to large rabbit (at full hop). It is also quite subjective and owners might not be sure what 10 hops looks like for their rabbit.</p> <p>Rabbits should also be kept out of direct (for example, nose to nose) contact with wild rabbits, to reduce the transmission of rabbit fleas which can also transmit Myxomatosis.</p>	
<p>2. Environment and housing Guidelines</p>	<p>G2.13 The position of the hutch should be changed regularly to rest the ground and allow grass to recover; this also provides enrichment for the rabbit and allows for removal of faecal matter.</p> <p>Table 1. Floor space requirements for pet rabbits agriculture.vic.gov.au/pets/other-pets/rabbits/guidelines-on-keeping-pet-rabbitsd be covered with insect proof mesh to protect rabbits from insects that can spread disease to rabbits, such as mosquitos that can infect rabbits with myxomatosis.</p>
<p>Note, these guidelines are adopted from the VIC government guidelines. (Guidelines for keeping pet rabbits Rabbits Other pets Animal Welfare Victoria Livestock and animals Agriculture Victoria) which reference the Victorian minimum standard for lab animal housing guidelines (Code of Practice for the Housing and Care of Laboratory Mice, Rats, Guinea Pigs and Rabbits Victorian codes of practice for animal welfare Prevention of Cruelty to Animals (POCTA) Act Animal Welfare Victoria Livestock and animals Agriculture Vi).</p>	



<p>There is more detail in the document that is worth mentioning here:</p> <p>* The animal weight provides an indication of the age and activity of the rabbits which is the important determinant of space requirements.</p> <p>** Minimum area includes the area of any shelving in the animal enclosure that doesn't reduce the total available area. Enclosures must be wide and long enough to permit rabbits to lie fully outstretched – minimum of 80cm clear space in at least one direction, and to provide a clear area to facilitate 1 to 3 complete hops for normal exercise requirements.</p> <p>*** The minimum height must refer to a cage/pen high enough for rabbits to stand upright unhindered (with ears not touching the roof).</p>	
<p>3. Handling Mandatory standards</p>	<p>S3.4 Rabbits must never be tethered. This means not securing a rabbit to an object or running line by means of a leash, chain, rope or other material. A rabbit fighting against a fixed tether can cause itself serious injuries that can result in death.</p>
<p>Please add clarification that tethering is not the same as harness and lead walking.</p>	
<p>3. Handling Mandatory standards</p>	<p>How to handle a rabbit: Techniques used to safely pick up a rabbit include: a) picking up the scruff while fully supporting the hindquarters, taking care to keep the rabbit close to the handler's body;</p>
<p>Suggest remove or reword this. The way it is currently written starting with 'picking up the scruff' is not clear. Rabbits should not be held in a weight bearing fashion by their scruff. Suggest either elaborate on this section, or remove it. Too little information with no picture may be difficult for rabbit owners to interpret.</p>	
<p>3. Handling Guidelines</p>	<p>G3.3 While rabbits do not require obedience training, they should be allowed to familiarise themselves, or be given appropriate training, with any new experience or environment. They should also be socialised with other rabbits, animals and humans when it is safe to do so. *</p>
<p>Suggest adding a section: Rabbits can easily fracture their own spines by struggling when restrained. Perhaps this should be above the Mandatory section.</p>	
<p>4. Hygiene Mandatory standards</p>	<p>S4.2 A person responsible for a rabbit must properly groom and maintain the rabbit.</p>
<p>Suggested rewording to: A person responsible for a rabbit must properly groom and maintain the hygiene/cleanliness of the rabbit.</p>	
<p>4. Hygiene Guidelines</p>	<p>G4.1 Regular grooming of rabbits assists with the detection of some diseases and parasite problems. Semi-long-haired and longhaired rabbits should be groomed twice per week. Shorthaired rabbits may need grooming only once per fortnight.</p>
<p>Rabbits will need to be groomed more frequently when moulting, to avoid knots and clumps of fur.</p>	



<p>4. Hygiene Guidelines</p>	<p>G4.5 Cleaning and disinfecting agents should be chosen based on their suitability, safety and effectiveness. Bleach or chlorine-based disinfectants are effective against common rabbit pathogens. Manufacturers' instructions for the use of cleaning and disinfecting agents should be followed; overly diluting a solution may be ineffective, and too concentrated a solution may be toxic to animals. All disinfectants should be thoroughly rinsed away with water following application.</p>
<p>Suggest rewording to: Cleaning and disinfecting agents should be chosen based on their suitability, safety and effectiveness. Bleach or chlorine-based disinfectants are effective against common rabbit pathogens. Manufacturers' instructions for the use of cleaning and disinfecting agents should be followed; including dilution rates and contact time. All disinfectants should be thoroughly rinsed away with water following application.</p> <p>Chlorine-based: This is not an exhaustive list and other cleaning chemicals are also suitable. Suggest clarifying or remove explicit mentions.</p>	
<p>5. Nutrition Guidelines</p>	<p>Additional guideline to be added</p>
<p>Suggest an additional guideline to incorporate enrichment to allow rabbits to express foraging behaviours while feeding.</p>	
<p>5. Nutrition Guidelines</p>	<p>Note: Roughage also helps to maintain the health of teeth and prevent behavioural problems related to boredom such as hair pulling and barbering. A rabbit's teeth grow continually, chewing prevents teeth from overgrowing. Grass clippings should not be fed to rabbits as they ferment quickly and can cause serious health problems.</p>
<p>Adequate dietary fibre is also critical to gut function and health.</p>	
<p>5. Nutrition Guidelines</p>	<p>G5.2 The diet should be based on roughage (e.g. hay), a good quality commercial dry pelleted food that contains a minimum of 15% crude fibre, fresh grass and or fresh greens. Pelleted feed should be provided in a container that prevents spoilage (e.g. a hopper slightly suspended on the side of the enclosure).</p>
<p>Suggest rewording to: The diet should be based on roughage (e.g. Timothy, meadow or oaten hay), a good quality hay-based pelleted food that contains a minimum of 15% crude fibre, fresh grass and/or fresh greens. Pelleted feed should be provided in a container that prevents spoilage (e.g. a hopper slightly suspended on the side of the enclosure). Note: In general, Lucerne Hay should not be fed to rabbits.</p>	
<p>5. Nutrition Guidelines</p>	<p>Note: A guide to the amount of pellets to feed daily is 25 grams per kilo of bodyweight per day. Old, mouldy, wet or contaminated pellets should never be fed and should be removed from the enclosure to prevent illness.</p>
<p>This seems high, e.g. desexed or sedentary/inadequate option to exercise rabbits probably require less. Suggest a measurable unit, e.g. 1 tablespoon/kg/day (with hay/grass and vegetables making up the rest of the diet). It is easier for owners to measure in scoops as not all have scales.</p>	



<p>5. Nutrition Guidelines</p>	<p>G5.6 A rabbit's diet may be supplemented with fresh vegetables such as bok choy, broccoli, parsley, celery, and kale.</p>
<p>Offer a variety of low calcium leafy greens such as Asian green vegetables, broccoli, celery leaves, etc. Avoid parsley, kale and spinach every day as they are high in calcium. Can be used as a treat food.</p>	
<p>5. Nutrition Guidelines</p>	<p>G5.6 A rabbit's diet may be supplemented with fresh vegetables such as bok choy, broccoli, parsley, celery, and kale.</p>
<p>Suggest rewording to: Food containing seed or muesli, or labelled for guinea pigs, should be avoided.</p>	
<p>5. Nutrition Guidelines</p>	<p>G5.9 The amount of food a rabbit consumes, and the rabbit's body condition should be monitored to ensure the rabbit is neither overeating nor under eating. This is important if more than one rabbit is being fed in the same area.</p>
<p>Suggest more emphasis should be placed on recognising obesity. About 1/3 of rabbits presenting to practice in one study are obese (in Chitty 2023 In Practice; this article cites other reports). This can have many flow on effects for health and welfare. Reducing rabbit BCS could offer good 'bang for buck' for mitigating welfare impacts on pet rabbits. Possible link to: Rabbit Size-0-Meter UK Pet Food</p>	
<p>6. Health Guidelines</p>	<p>G6.1 Disease prevention should be discussed with a veterinarian. At a minimum, vaccination against Calicivirus is required every 6-12 months or as advised by a veterinarian, and an effective flea and worm control program with approved products for use on rabbits.</p>
<p>Suggest annual health check with veterinarian to detect issues early. Suggest vaccination is a separate point.</p>	
<p>6. Health Guidelines</p>	<p>G6.2 Rabbits should be desexed not only to prevent unwanted offspring but also to reduce stress levels driven by hormones, which make rabbits more prone to fighting and displaying other territorial behaviour. *</p>
<p>Suggest rewording to: Rabbits should be desexed to prevent unwanted offspring and reduce undesirable behaviours, such as destructive burrowing (through carpets etc), fighting and displaying territorial behaviour. Suggest adding addition sentence: Undesexed female rabbits are also at a very high risk of diseases such as cancers and uterine bleeding which lead to significant illness and even death.</p>	
<p>6. Health Guidelines</p>	<p>G6.3 Rabbits who over groom themselves may develop gastric trichobezoars (hair balls in the stomach) which can cause discomfort and a blockage in the stomach. This condition should be treated by a veterinarian as rabbits are unable to vomit and cannot clear the obstruction themselves. Over-grooming should be prevented by ensuring the rabbit is not bored or stressed, has an appropriate high fibre diet, fresh water and adequate exercise.</p>
<p>Suggest drawing the reader's attention to monitoring food intake and being aware of a rabbit that is not eating. The owner should contact a veterinarian as a priority if the rabbit is not eating.</p>	



<p>8. Identification, lost and unwanted rabbits <i>Guidelines</i></p>	<p>G7.1 Compatible companions should preferably be of the same species wherever possible.</p>
<p>Suggest rewording to: Rabbits should be micro-chipped by a suitably qualified person or a veterinarian. Details of the microchip should be registered on a national microchip database.</p> <p>Note: It is problematic to use the phrase "specialising in" as the word "specialist" has a legal meaning of someone recognised by a State or Territory Veterinary Practitioner's Board as a Specialist in a certain field. While the phrase "specialising in" is not the same, it would be preferable to use "experienced in or with" (throughout the document).</p>	
<p>8. Identification, lost and unwanted rabbits <i>Guidelines</i></p>	<p>G8.2 Keepers who lose a rabbit should act promptly to attempt to locate their lost pet for the rabbit's safety and to minimise the time the rabbit may be in distress.</p>
<p>This should be a "must" statement. Without registration on a national database with ready access by all relevant parties), the microchip is useless. Include DAS,RSPCA, any rabbit rescue groups, and Canberra Lost Pet Database https://www.facebook.com/CanberraLostPetDabase/</p>	
<p>9. Breeding <i>Mandatory standards</i></p>	<p>S9.5 If a doe does not feed her kittens within a few hours of birth then veterinary advice must be sought as hand rearing may be necessary. Prompt advice should be obtained as the kittens are at risk of death if they do not feed shortly after birth.</p>
<p>Not sure about this. BSAVA Rabbit manual states the following key points: 'the doe will feed the kits once or sometimes twice daily....it is very common for owners to think that a litter has been abandoned if they do not see the doe with her kits...it is unusual to observe a doe suckling her kits and it can be difficult to determine whether kits have been fed for the first 48 hours'. My concern is this mandatory standard may over-state the roll of hand-rearing, which BSAVA states: '(Hand rearing) should only be taken as a last resorthand-reared newborn kits rarely survive to become fit, healthy adults'.</p> <p>Suggestion for revision of this standard, perhaps if owner is concerned about kitten health, to discuss with veterinarian 1) methods for assessing kitten health; and 2) options for providing extra support to kittens without necessarily opting for hand reading. BSAVA has ideas on this, but they probably too detailed for this standard.</p> <p>Final statement from BSAVA on hand rearing: 'Kits should only be completely hand reared if the doe dies, is too unwell to care for them or is damaging them'.</p>	
<p>9. Breeding <i>Mandatory standards</i></p>	<p>S9.6 A kitten must not be permanently removed from its mother until it is 8 weeks of age and eating solid food, unless on veterinary advice.</p>
<p>See comment below G9.16 re. weaning.</p>	
<p>9. Breeding <i>Guidelines</i></p>	<p>G9.6 From about 15 days post mating extra nesting material such as hay and straw should be provided, the doe may also pull fur from her chest, belly, flanks and forelegs to line the nest. Once nest building commences, the nesting area should not be disturbed until after young can leave the nest</p>



	(approx. 3 weeks). An exception to this is if the doe excessively urinates and defecates in the nest in the lead up to the birth, or the nest becomes wet or infested with vermin .
Uncertain of meaning - Vermin as in cockroaches, rabbit mites, etc? Suggest remove or clarify.	
9. Breeding Guidelines	G9.10 Kittens are born hairless and blind and obtain everything they require from the doe.
This is a statement not a guideline. Perhaps could use this point to explain that does feed their kittens once or twice a day and the owner may not observe this happening.	
9. Breeding Guidelines	G9.15 Kittens should be raised with extensive contact with their carer to ensure that they will be well conditioned as pets. Kittens should be trained to use a litter tray, to accept grooming, to relate to other rabbits, and to respond positively to humans. Longhaired and semi-long haired kittens should be groomed daily from 5 weeks of age to accustom them to grooming.
Suggest rewording to: Kittens should be raised with regular interaction with their carer (but not handled unnecessarily immediately after birth) to ensure that they will be well socialised as pets. Kittens should be trained to use a litter tray, to accept grooming, to relate to other rabbits, and to respond positively to humans. Longhaired and semi-long haired kittens should be groomed daily from 5 weeks of age to accustom them to grooming.	
9. Breeding Guidelines	G9.16 Kittens should be weaned, vaccinated (at five weeks) and wormed prior to re-homing. This might not apply if the person has veterinary advice recommending the kitten be removed before the rabbit has reached 8 weeks of age or is eating solid food. Kittens need to be at least 6 weeks old before leaving their mother to facilitate physical, immunological, behavioural, social and mental development in the young animal.
This statement of 6 weeks seems to conflict with the mandatory guideline (S 9.6) of minimum age of 8 weeks for time before removal from mother. 6 weeks is adequate (BSAVA Manual of Rabbit Medicine states 'weaning takes place at 4-6 weeks' but doesn't explicitly indicate if the kittens should have a period of time with their mother post-weaning).	
10. Transport Mandatory standards	S10.4 Transportation must be undertaken in the shortest time possible. If transported for longer than one hour, drinking water must be provided in a water vessel securely fixed to the side of the container. If in transport for 12 hours or longer, provision must be made for food to also be provided.
We strongly feel that 12 hours without food is far too long for a rabbit and serious complications could arise. We suggest 2 hours without water and 4 hours without food being the maximum.	
10. Transport Guidelines	G10.6 Rabbits are best transported singularly as transport containers do not allow enough space for them to move away from each other and the risk of stress and injury increases . G10.7 Advice should be sought from the shipping, airline or railway or coach service when transporting a rabbit interstate or overseas. International transport will be required to adhere to the Department of Agriculture, Fisheries and Forestry and



	International Air Transport Associations (IATA) standards and requirements.
G10.6 - This section mixes up transport by an owner (e.g. for vet care) with shipping unaccompanied. Labels are not required for a trip to the vet.	
G10.7 - This department changes name from time to time. Can this be generalised, so the COP doesn't date? 'Relevant Australian Government Agriculture Agency' or similar?	
11. Ending a rabbit's life Guidelines	G11.2 Circumstances in which it might be reasonable to euthanise an unwanted rabbit include, but are not limited to, where the keeper has been unable to rehome the rabbit despite having made a reasonable effort as set out in Guideline 8.1 of this Code.
Guideline 8.1 is about microchips. We believe the reference should be to Standard 8.1 (not G8.1)	



AVA Comments:

Code of Practice for the Keeping and Breeding of Rats and Mice (Rodents) in the ACT

<p>2. Environment and housing Guidelines</p>	<p>G2.1 In addition to providing for the rodent's needs, a keeper or carer has a responsibility to:</p> <p>a) Protect them from direct risk of harm, such as being attacked by other animals or humans;</p> <p>b) Minimise the impact of the rodent on wildlife and the environment through appropriate control and/or containment; and</p> <p>c) Provide the animal with adequate and appropriate food and water to maintain the animal's good health and comfort; and</p> <p>d) Provide a level of hygiene that supports good health and prevents illness and disease.</p> <p>*additional point to be added</p>
<p>e) Provide a sturdy shelter that will protect the animal/s from the elements should they be housed outside (noting that rats and mice are nocturnal). This should be able to with stand strong winds, heavy rainfall, keep them all dry, and provide shade and protection in the hottest parts of the day.</p>	
<p>4. Hygiene Guidelines</p>	<p>G4.10 Nesting material should be discarded and replaced once per week (unless there are young pups in the nest in which case it is important not to disturb the nest). *additional point to be added</p>
<p>Additional: ventilation should be sufficient to prevent the build-up of dusts, infectious agents, humidity, and ammonia.</p>	
<p>5. Nutrition Mandatory standards</p>	<p>S5.1 Clean water must always be available; water must be checked daily and topped up as necessary. Rats require up to 50ml of water daily, or more if the diet is dry. Mice require up to 5ml per day each.</p>
<p>Should this be in mL/kg/day to account for variation in rodent weights?</p>	
<p>5. Nutrition Guidelines</p>	<p>G5.3 Mice require 5-10g of food per day, rats require 15-20g of food per day. A complete pelleted diet assists in ensuring rodents receive their nutritional requirements in the small quantity required.</p>
<p>Mice require 5-10g (again, should this be in g/kg/day? Or even kcal ME/BWkg^{0.75}/day. See National Research Council 'Nutrient Requirements of the Mouse' which suggests an estimated maintenance daily ME of 160 kcal/BWkg^{0.75}/day) of food per day, rats require 15-20g (as above) of food per day.</p>	
<p>5. Nutrition Guidelines</p>	<p>G5.9 Diets containing birdseed should only be fed occasionally as a treat.</p>
<p>Recommend changing to: "Diets containing seed are inappropriate and contribute to obesity and poor health. They should not be fed birdseed".</p>	
<p>5. Nutrition Guidelines</p>	<p>G5.15 Water should be replaced daily; it should be kept clean and out of direct sunlight and should be thawed or replaced if frozen.*</p>
<p>Suggest rewording to: Water should be replaced daily; it should be kept clean and out of direct sunlight and should be thawed or replaced if frozen or contaminated.</p>	



<p>6. Health Guidelines</p>	<p>G6.2 Healthy, short-haired rodents do not require grooming. However, some fancy breeds with longer hair are likely to require regular grooming. *</p>
<p>Suggest rewording to: Healthy, short-haired rodents do not require grooming given this is an important behavioural phenotype of the rodent. However, some exotic? breeds with longer hair are likely to require regular grooming. Lack of grooming or overgrooming may be a sign of moderate arousal or high stress states that elicit freezing, flight, or fight responses (Song C, Berridge, K.C, and Kalueff, A. V, 2016 Nat Rey Neurosci).</p>	
<p>6. Health Guidelines</p>	<p>Additional guideline should be added.</p>
<p>Please add another guideline stating that "Desexing of rats, particularly females, is strongly recommended to reduce risk of reproductive based diseases and hormonal aggression. Mice can be desexed but this is usually performed only when required for an individual animal's health or wellbeing."</p>	
<p>8. Identification, lost and unwanted rodents Guidelines</p>	<p>Note: It is unusual to microchip a mouse due to the size of the microchip however it is possible for rats, usually under anaesthesia by a veterinarian.</p>
<p>It was mentioned above that rodents should not wear collars, and that it is unusual for them to be microchipped. Given this is the case, what are the best means for identification? This should be listed here as an alternative.</p>	
<p>10. Transport Guidelines</p>	<p>S10.4 Transportation must be undertaken in the shortest time possible. If transported for longer than one hour, drinking water must be provided in a water vessel securely fixed to the side of the container. If in transport for 6 hours or longer, provision must be made for food to also be provided.</p>
<p>6 hours off food is likely to cause illness in rats and mice. It is recommended that they be transported with food and water except for very short journeys of less than 1 hour. S10.5 is not needed as the above should be adopted. Should quarantine period be added in this section?</p>	



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