

# Bulgarian Animal Programs Foundation

18 Janko Sofijski Vojvoda Str., 1164 Sofia :: [animalprograms.org](http://animalprograms.org) :: [pet@animalprograms.org](mailto:pet@animalprograms.org)

CEO: Emil D. Kuzmanov

31 August 2011

Open letter to:

Mr. Bojko Borisov, Prime Minister

Dear Prime Minister,

On 23 June 2011, you get the Animal Programs' report on scandalous animal shelter operations in Bulgaria. It suggest that your team should learn from best practice in animal shelter accountability. Regrettably, you did not reply. It seems so far you did not consider necessity of a transparent, fact-based and valuable stray animal control in order to curb the national pet population dynamics.

Instead, acting on behalf of the Council of Ministers, you proposed few draft amendments to the Animal Protection Act of 2008, news media announced. After checking the website of Ministry of Agriculture, I found the only proposed changes in the scope of pet population management - extending the term for neutering street dogs and then impounding all them until the end of 2015.

The draft proposes that during this transitional period municipalities to be allowed "to properly and successfully curb stray dog population" and "to construct sufficient animal shelter capacity to hold dog overpopulation." Obviously, that intentions are relying on the current requirements under Article 47, paragraphs 1, 3, and 4, and Article 55 of the Animal Protection Act providing only Catch-Neuter-Release approach and lifelong sheltering.

It should be noted that the dog overpopulation consists primarily of unwanted offspring of owned animals (or unwanted owned animals) and few native strays, i.e. it is not a separate population that is dependent on separate animal birth control and/or final removal. The excessive pet reproduction presents the major and permanent problem of both dog and cat populations in Bulgaria, because it is resulting in massive abandonment and roam of animals. From this, the relevant errors of current animal protection legislation in Bulgaria can be resumed in the next items:

(1) There are no institutional obligations provided to organize and carrying out information and educational programmes for discouraging excessive dog and cat breeding and encouraging pet neutering in disregard of the provisions under Article 14 of the European Council's Convention for the Protection of Pet Animals.

(2) There are no institutional obligations provided to organize and carrying out low-cost neutering schemes, i.e. accessible veterinary services to increase sterilization rate, in disregard of the provisions under Article 12 of the European Council's Convention for the Protection of Pet Animals.

(3) The law, however, obligates municipalities to fund ineffective Catch-Neuter-Release programmes involving unwanted dogs and/or "to impound such dogs at temporary animal shelters outside settlements." The new opened facilities of high capacity cannot present a realistic solution for the forthcoming permanent dog intake. Additionally, premises would be quickly overcrowded and that would cause distress and suffering of the impounded animals.

(4) The euthanasia of healthy unwanted pet animals is not allowed and no humane and effective decision for the fate of the routinely abandoned dogs pursued by people or dying as roadkills.

Generally, current narrow legislation and draft amendments could not reduce pet over-reproduction, pet population pressure, animal roam, and abusive treatment of roaming animals. This approach would not contribute to improving welfare of unwanted animals. It would disregard the public interests again and would assist only the untransparent disposition of shelter animals.

Using the stated order of above noted faults, I am drafting appropriate textes in the relevant articles and paragraphs listed below that must be revized and amended, as follow:

Article 4: "Every Municipal Council shall organize, fund and carry out information-educational programme involving students and university students that are focused on:

1. the need of restriction of the unplanned pet breeding;
2. the benefits of pet sterilization;
3. the risk of the irresponsible acquisition of pets that is leading to growing count of the unwanted and abandoned animals."

Article 36: "(3) Every Municipal Council shall organize and fund low-cost pet sterilization services that are easily accessible to the animal owners.

(4) Every Municipal Mayor has obligation to offer all qualified local veterinarian surgeons participation in the low-cost sterilization schemes under third paragraph.

(5) The Ministry of Agriculture shall provide mobile sterilization clinics and trained veterinary teams for carrying out low-cost sterilization under third paragraph in the remote places that are not regularly served by trained veterinary surgeons."

Article 47: "(1) Every Municipal Mayor has the obligation to provide immediate sheltering in a municipal or private shelter for every newly appearing roaming dog, with exception of the already neutered and released ones.  
(2) The impounded animals that are not claimed by owners can be adopted by citizens after surgical sterilization, desinfestation and anti-rabies immunization, under condition that will be handled as companions under provisions of Article 37.  
(3) The repeated catching and sheltering of sterilized animals under first paragraph is forbidden, except in cases under the Article 16.  
(4) After [date of entry into force], it is forbidden to release back outside the dogs under first paragraph.  
Paragraphs 5, 6 and 7 shall be revoked.

Article 51: "(1) Every non-government organization under point (2) of sixth paragraph of Article 42 has the right to take any animal admitted to a municipal shelter that is not reunited with owner or adopted within a 14-day period.  
(2) Every municipal and private shelter manager has the right to euthanize any animal admitted to the same shelter that is not reunited with owner or adopted within a 14-day period."

Article 55 shall be revoked.

Finally, seven years after ratification of the European Council's Convention for the Protection of Pet Animals, Bulgarian authorities did nothing to reduce pet population birth rate, the suffering of unwanted animals and the animal shelter system's shady practices, including pet theft. While serving as Sofia Mayor between 2005 and 2009, you failed to introduce best practice in managing local dog population. Now I am begging you to fight decisively the major pet population management issues at national level. Today I am also sending you the true and comprehensive Bulgarian language version of the International Companion Animal Coalition's "Humane Dog Population Management Guidance."

Emil D. Kuzmanov, Founder and CEO, acting on  
behalf of the Bulgarian Animal Programs Foundation