



Steve Troxler
Commissioner

North Carolina Department of Agriculture
and Consumer Services
Veterinary Division

Doug Meckes, DVM
State Veterinarian

December 4, 2014

To: Licensed Certified Euthanasia Technicians and Registered Animal Shelters

Re: The Policy Statement on Euthanasia by Carbon Monoxide

Enclosed please find the Euthanasia by Carbon Monoxide Policy Statement. The North Carolina Department of Agriculture and Consumer Services has not changed its rules and requirements for the use of carbon monoxide (CO) in registered animal shelters. Those rules are contained in Title 02 North Carolina Administrative Code Section 52J .0400. In these rules, the Department adopts by reference the recommendations issued by the American Veterinary Medical Association, the Humane Society of the United States, and the American Humane Association.

HSUS and AHA do not approve of the use of CO for the euthanasia of dogs and cats. However, until 2013, the AVMA did approve with conditions the use of CO for the euthanasia of companion animals. Therefore, under our rules, CO for companion animal euthanasia was acceptable with conditions. The 2013 AVMA Euthanasia Guidelines changed that acceptance with this statement:

Consequently, CO is acceptable with conditions for use in institutional situations where appropriately designed and maintained equipment and trained and monitored personnel are available to administer it, but it is not recommended for routine euthanasia of cats and dogs. It may be considered in unusual or rare circumstances, such as natural disasters and large-scale disease outbreaks."

The Animal Welfare Section of the Department has reviewed the most current guidelines of all three organizations noted in 02 NCAC 52J .0401 and finds that none of the three organizations approve of the use of CO for the routine euthanasia of dogs and cats. Therefore, under our existing statutes and rules this method is no longer acceptable for the routine euthanasia of dogs and cats.

If a rare or unusual circumstance, natural disaster or large-scale disease outbreak necessitates the use of CO to euthanize a dog or cat, it should be documented on the disposition sheet for that animal.

As all registered shelters should already be using EBI for the euthanasia of certain animals, Certified Euthanasia Technicians ("CETs") should not require any additional training, and no forms should need revision. Consequently, and in light of the AVMA changes, the Department expects all licensed shelters and CETs to immediately start following the attached policies and have them implemented by no later than February 15, 2015.

Should a facility anticipate that they will be unable to come into full compliance by February 15, 2015, they may submit a request for an extension. The extension request must be written and must include the following:

- 1) The reason(s) why the facility cannot achieve full compliance by February 15, 2015;
- 2) The plan of action the facility will undertake in order to come into full compliance;
- 3) The expected date of completion for each step of the action plan; and
- 4) The final date in which the facility will be in full compliance with this policy.

The request for an extension must be received by this office by January 7, 2015. The Director of the Animal Welfare Section will review each extension request on a case-by-case basis. The Director will notify the facility as to the approval or disapproval of the request in writing. Any extension request granted by the Department will be a one-time extension only. In the absence of an approved extension request all facilities will be expected to be in full compliance by February 15, 2015.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Patricia Norris', with a long horizontal flourish extending to the right.

Patricia Norris, DVM,
Director, Animal Welfare Section,
Veterinary Division, NCDA&CS

Carbon Monoxide Euthanasia Policy Statement

Animal Welfare Section; Veterinary Division; NCDA&CS

The North Carolina General Assembly enacted General Statute section 19A-24(5) to regulate animal euthanasia in animal shelters, pet shops and boarding kennels:

§ 19A-24. Powers of Board of Agriculture.

(a) The Board of Agriculture shall:

(5) Adopt rules on the euthanasia of animals in the possession or custody of any person required to obtain a certificate of registration under this Article. An animal shall only be put to death by a method and delivery of method approved by the American Veterinary Medical Association, the Humane Society of the United States, or the American Humane Association. The Department shall establish rules for the euthanasia process using any one or combination of methods and standards prescribed by the three aforementioned organizations. The rules shall address the equipment, the process, and the separation of animals, in addition to the animals' age and condition. If the gas method of euthanasia is approved, rules shall require (i) that only commercially compressed carbon monoxide gas is approved for use, and (ii) that the gas must be delivered in a commercially manufactured chamber that allows for the individual separation of animals. Rules shall also mandate training for any person who participates in the euthanasia process.

Subsequently, the Board adopted a rule that adopts by reference the provisions for euthanasia in the manuals and written policies recommended by the three named organizations:

02 NCAC 52J .0401 ADOPTION BY REFERENCE

A person required to obtain a certificate of registration pursuant to G.S. 19A, Article 3 may use any method of euthanasia approved by the American Veterinary Medical Association (AVMA), the Humane Society of the United States (HSUS), or the American Humane Association (AHA) which are hereby incorporated by reference, including subsequent amendments and editions. Copies of these documents may be obtained as follows:

- (1) AVMA Guidelines on Euthanasia may be accessed at no cost on their website at www.avma.org.
- (2) The HSUS Euthanasia Training Manual can be purchased through their website at www.hsus.org at a cost of nineteen dollars and ninety-five cents (\$19.95).
- (3) The AHA publication, Euthanasia by Injection, can be purchased through their website at www.americanhumane.org at a cost of ten dollars (\$10.00).

Currently euthanasia using carbon monoxide is approved for use for cats and dogs only under the AVMA's Guidelines on Euthanasia, and only when specific requirements and conditions are satisfied. The Department, by virtue of having adopted that publication by reference, deems the method, CO, to include the AVMA's directions for both how and when to use it to be part of its rule. Thus, all certified euthanasia technicians must use CO only as the AVMA recommends:

Carbon monoxide—Carbon monoxide can be used effectively for euthanasia when required conditions for administration (see detailed discussion in Inhaled Agents section of the Guidelines) can be met. These conditions can be challenging and costly to meet on a practical basis, and there is substantial risk to personnel (hypoxia) if safety precautions are not observed. Consequently, CO is acceptable with conditions for use in institutional situations where appropriately designed and maintained equipment and trained and monitored personnel are available to administer it, but it is not recommended for routine euthanasia of cats and dogs. It may be considered in unusual or rare circumstances, such as natural disasters and large-scale disease outbreaks. Alternate methods with fewer conditions and disadvantages are recommended for companion animals where feasible.

P. 45, AVMA Guidelines for the Euthanasia of Animals: 2013 Edition.

Thus, no licensee, registered animal shelter or CET should be using CO as the routine method of euthanasia for dogs and cats. The Department recommends that CET record the unusual or rare circumstances, natural disaster or large-scale disease outbreak which necessitated the use of CO in the animal's disposition record.

The Department will deem CO to have been used in a manner consistent with the AVMA Guidelines when:

- a) The facility is in full compliance with 02 NCAC 52J Section .0400, Euthanasia Standards; and
- b) The reason for the use of CO meets the standard of "unusual or rare circumstance, natural disaster, or large-scale disease outbreak."

The Director of Animal Welfare will determine whether the reason given constitutes a natural disaster, large-scale disease outbreak, or other unusual or rare circumstances that, consistent with sound principles of public health, indicate that CO is appropriate for euthanasia. Therefore the Animal Welfare Section strongly encourages any licensee or registered animal shelter that operates a CO chamber to consult with the Director before using the CO chamber to euthanize a cat or dog. Advance consultations will ensure that the CET is using the CO chamber in compliance with the laws and rules.