A close-up photograph of a small, light-colored puppy with dark brown patches around its eyes and ears. The puppy is looking through a silver chain-link fence, with its front paws visible, gripping the metal mesh. The background is blurred, showing green foliage.

# WHITE PAPER ON **STRENGTHENING PROTECTIONS FOR ANIMAL WELFARE**

**A Joint Submission by**

Animal Concerns Research and Education Society (ACRES)  
Society for the Prevention of Cruelty to Animals (SPCA) Singapore



# **WHITE PAPER ON STRENGTHENING PROTECTIONS FOR ANIMAL WELFARE**

## **Introduction**

In 2012, the Animal Welfare Legislation Review Committee (AWLRC) was formed to conduct a comprehensive review of Singapore's animal welfare legislation and policies. The AWLRC comprised representatives from Members of Parliament, community leaders, and industry representatives.

Following a year-long study and consultations, the AWLRC released a paper with 24 recommendations for improving welfare. The recommendations covered the four areas of: (a) ensuring reasonable care and welfare of animals, (b) increasing deterrence and stepping up action against wrongdoers, (c) fostering greater responsibility in industry, and (d) fostering greater responsibility among pet owners and greater community awareness.

The AWLRC's work led to the tabling of a Private Member's Bill to amend the Animals and Birds Act. The AWLRC also led to the formation of the Multi-Stakeholder Collaboration Committee (MSCC) for animal welfare to develop Codes of Animal Welfare that provide standards and guidelines on care and interactions with animals. The work done by the MSCC ultimately contributed to the Code of Animal Welfare (for pet owners) and the Code of Animal Welfare (for the pet industry).

Over a decade later, it is necessary for another comprehensive review of our animal welfare legislation and policies. This White Paper sets out 15 recommendations in four areas: (a) animal welfare education, (b) general animal welfare legislation and policies, (c) companion animal protection, and (d) wildlife protection.

The recommendations in this White Paper were developed by a Committee led by former Member of Parliament Louis Ng, comprising animal welfare groups, legal academics, and lawyers. The Committee's work was based on public feedback from a dialogue session with animal welfare groups on 27 June 2024, the VOICE Conference held by the Society for the Prevention of Cruelty to Animals (SPCA) Singapore from 20 to 22 June 2024, and the Nee Soon Public Forum on Animal Welfare Policies held on 14 July 2024.

This White Paper is jointly submitted to the Ministry of National Development by the Animal Concerns Research and Education Society (ACRES) and the SPCA Singapore.

**June 2025**

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STRENGTHENING PROTECTIONS FOR ANIMAL WELFARE

**AREA 1**

**STRENGTHEN ANIMAL  
WELFARE UNDERSTANDING  
AMONG THE GOVERNMENT  
AND THE PUBLIC**



**Recommendation 1:**

**Establish Animal Welfare Expert Advisory Panel to advise the government on animal welfare**

1. The Committee recommends that the government establish an **Animal Welfare Expert Advisory Panel (“AWEAP”)** to advise on animal welfare matters in all aspects of government policymaking and action and drive the development of a National Animal Welfare Strategy.

**Introduction to Recommendation 1**

2. Recommendation 1 aligns with the global animal welfare strategy articulated by the World Organisation for Animal Health (WOAH)<sup>1</sup>:

“Animal welfare is a complex, multifaceted, international and domestic public policy issue with scientific, ethical, economic, legal, religious and cultural dimensions plus important trade policy implications. It is a responsibility that must be shared between governments, communities, the people who own, care for and use animals, civil society, educational institutions, veterinarians and scientists. Mutual recognition and constructive engagement among parties are necessary to achieve sustained improvements to animal welfare.”

3. Several countries have implemented a national strategy for animal welfare, including New Zealand<sup>2</sup> and Malaysia<sup>3</sup>. Notably, Malaysia has formulated a National Animal Welfare Strategic Plan 2021–2030.<sup>4</sup>
4. The proposed AWEAP would lead the development of a National Animal Welfare Strategy based on four key focus areas:
  - a. Develop animal welfare standards
  - b. Facilitate legal enforcement
  - c. Coordinate and communicate government policies
  - d. Promote humane education
5. Animal welfare experts and advocates should comprise at least two-thirds<sup>5</sup> of the AWEAP and should include veterinarians, behaviourists, trainers, lawyers with expertise in animal law, government officials involved in animal welfare policymaking, representatives from animal welfare groups, and animal researchers.
6. AWEAP members should be competent in providing insights on a range of animal welfare issues regarding, but not limited to, companion and community animals, wildlife, farmed animals, and animals used in research and the food industry.

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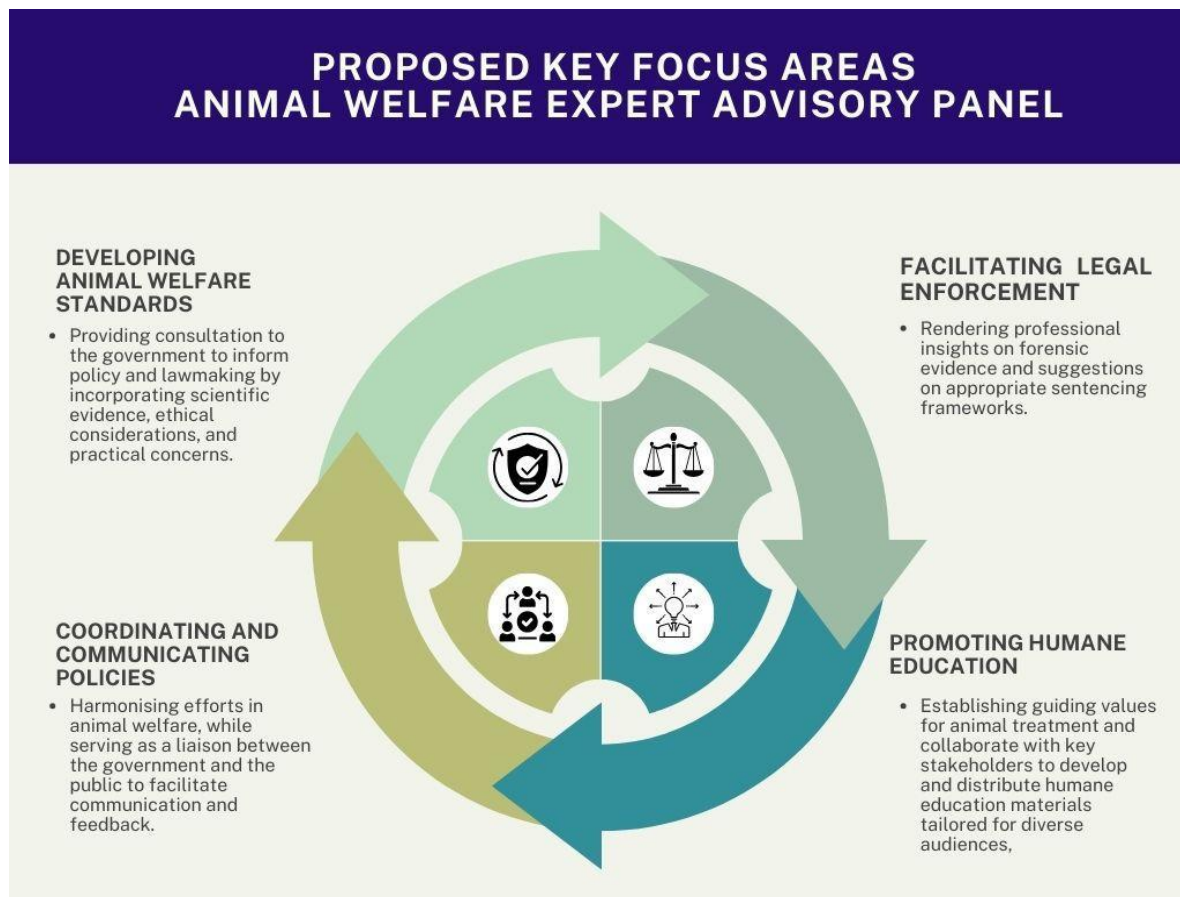
<sup>1</sup> World Organisation for Animal Health. (2017, May). *OIE Global Animal Welfare Strategy*. <https://www.woah.org/app/uploads/2021/03/en-oie-aw-strategy.pdf>

<sup>2</sup> Ministry for Primary Industries. (2013, May). *Animal welfare matters: New Zealand Animal Welfare Strategy*. <https://www.mpi.govt.nz/dmsdocument/3963-Animal-Welfare-Matters-New-Zealand-Animal-Welfare-Strategy>

<sup>3</sup> Department of Veterinary Services Malaysia. (2014). *National Animal Welfare Strategic Plan 2012-2020. Second edition*. [https://www.dvs.gov.my/dvs/resources/user\\_1/DVS%20pdf/Kebijakan%20Haiwan/Buku\\_Pelan\\_Strategik\\_English1\\_\(3\).pdf](https://www.dvs.gov.my/dvs/resources/user_1/DVS%20pdf/Kebijakan%20Haiwan/Buku_Pelan_Strategik_English1_(3).pdf)

<sup>4</sup> World Organisation for Animal Health. (2024, February). *RAWS Newsletter*. [https://rr-asia.woah.org/app/uploads/2024/03/animal-welfare-newsletter-february-2024\\_opt0305\\_3.pdf](https://rr-asia.woah.org/app/uploads/2024/03/animal-welfare-newsletter-february-2024_opt0305_3.pdf)

<sup>5</sup> This proportion is consistent with the Laws & Regulations Database of The Republic of China (Taiwan). (2021, May 19). *Animal Protection Act*. <https://law.moj.gov.tw/ENG/LawClass/LawAll.aspx?pcode=M0060027>



**Fig. 1:** Proposed key focus areas of the Animal Welfare Expert Advisory Panel.

***The panel will prioritise four key focus areas (KFA), the outcomes of which will inform and shape the development of the National Animal Welfare Strategy.***

7. Under **KFA #1, Developing Animal Welfare Standards**, the panel will provide consultation to the government on policies and laws regarding animal welfare issues.
  - a. The combined expertise of the panel will ensure thorough consideration of the scientific evidence (e.g. best practices, humane measures to reduce suffering), ethical issues, and practical concerns. It would also put Singapore on the map as a rising leader in animal welfare by aligning with international benchmarks.
  - b. The panel's collective knowledge can provide consultation and review the evidence and rationale for depopulation efforts involving any animal species in Singapore (including those exempted from other legal frameworks). This will include cases where animals are culled for reasons unrelated to depopulation.
  - c. A working group could further advise stakeholders on animal welfare practices within the food industry. This includes guidance on areas such as transportation, facility design, religious rituals, slaughter processes, holding facilities, husbandry, breeding, and housing for display or

- slaughter. The recommendations would aim to ensure the elimination or reduction of unnecessary pain or suffering, whether physical or mental, promoting the uptake of humane practices as far as possible.
8. Under **KFA #2, Facilitating Legal Enforcement**, the panel will assist the court in animal welfare cases by offering expertise to:
    - a. Render professional insights to determine matters such as cause of death, extent of suffering, and if the animal's poor state of health is externally inflicted or due to an inherent health condition
    - b. Provide inputs on minimum standards for evidence collection and forensic examination in animal cruelty and welfare cases
    - c. Suggest sentencing frameworks according to the level of harm to the animal and cost of life, culpability, and punitive measures
  9. Under **KFA #3, Coordinating and Communicating Policies**, the panel will:
    - a. Work closely with local and international organisations to enhance coordination, avoid duplication of effort, and establish mutually recognised and consistent standards in niche areas of animal welfare
    - b. Conduct periodic reviews on the effectiveness of existing legislation on animal welfare
    - c. Serve as an intermediary between the government and people by facilitating feedback on animal welfare concerns and conveying policies to the public
  10. Under **KFA #4, Promoting Humane Education**, the panel will:
    - a. Determine the values that guide animal treatment in Singapore which would feed forward into the planning and delivery of enhanced humane education. The panel will work with key stakeholders to develop and disseminate materials for a range of learners (e.g. as young as preschoolers, for new pet owners, those in animal care roles).

***Recommendation 1 will foster collaboration and strengthen public confidence.***

11. It leverages the credibility of panel members — who work on the ground and have public support — in disseminating important policies that concern animal welfare to safeguard our biodiversity, public safety, and health. By virtue of their extensive grassroots work, panel members are uniquely positioned to nuance communications in a way that is easily understood and positively received by the public.
12. In serving as a neutral intermediary, the panel would keep the government apprised of public sentiments on animal welfare and steer the feedback into solution-oriented conversations. The panel may assist in conducting focus group discussions and public consultations, thereby allowing the government to optimise resources to focus on compliance and governance. This complementary function is especially important, given the surge in animal cruelty cases and the manpower constraints imposed by public service attrition rates.<sup>6</sup>

***Recommendation 1 will assist in determining more appropriate sentencing options and ensuring greater compliance with the Animals and Birds Act.***

13. In animal cruelty and welfare cases, arriving at a commensurate sentence is often challenging due to the subjectivity of “unnecessary pain and suffering” (mentioned but not defined in the Animals and Birds Act) and the inability of animal victims to advocate for themselves. This is especially crippling in situations where the animal does not sustain any injury or illness but was nonetheless placed in a situation that would reasonably lead to adverse wellbeing, as in *PP v Ling Chung Yee Roy*.<sup>7</sup> In such cases, a panel could provide expert opinions that inform the court’s decision. In *PP v Ling*, veterinarians and a dog behaviour specialist were instrumental in defining unnecessary suffering and securing a conviction under Section 42(1)(e) of the Animals and Birds Act.
14. The establishment of the panel will facilitate a direct line of communication for animal welfare groups to appeal and advocate for fairer sentences that are more aligned with existing legislation. Given the recent increase in breaches of the Animals and Birds Act, there is a need to send a stronger deterrent message to persistent offenders. For example, in January 2024, a critically endangered native Sunda pangolin was poached and sold twice on Telegram. The NParks Prosecution sought a fine of S\$8,000 to S\$10,000, which is 10% of the maximum penalty under the Wildlife Act for offences such as the unauthorised taking, possession, and sale of a protected species, as well as failing to provide adequate water and suitable food. Despite ACRES and eight other local organisations submitting an appeal along with a comprehensive Species Victim Impact Statement for the Sunda pangolin to the AGC, there was no official response, and the final sentence was probation for the offender.
15. By formally recognising the panel as an official resource, there would be greater opportunities for the panel to contribute their expertise to support the courts in making more informed decisions on such critical cases.

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<sup>6</sup> Public Service Division. (2022, February 15). *Oral reply to Parliamentary Question on attrition in the Public Service*. <https://www.psd.gov.sg/newsroom/pq-replies/attrition-in-the-public-service/>

<sup>7</sup> *Public Prosecutor v Ling Chung Yee Roy* [2013] SGDC 252.



***Recommendation 1 also contributes more broadly to our national goals.***

16. Recommendation 1 will contribute to our national goals in the following ways:
- a. **Reaffirm Singapore's commitment** as a member of the World Organisation for Animal Health (WOAH) to optimising the health of its people, animals, and the environment. The WOAH has animal welfare as one of its key mandates.
  - b. **Augment Singapore's One Health framework** which currently consists of the Ministry of Health, National Environment Agency, National Parks Board, Singapore Food Agency, and Singapore's National Water Agency. Introducing an explicit focus on animal welfare beyond animal management would add value by representing concerns and presenting solutions from an animal-centred perspective.
  - c. **Contribute to Singapore's "30 by 30" goal in food sustainability** by ensuring that both public and animal safety are held to high standards in any food production.
  - d. **Enrich Our Singapore Conversation** by including animals in a way that is naturally compatible with Singaporeans' priorities. For example, Singaporeans would like a society that takes care of the disadvantaged, is anchored in values (compassion was cited), and where government and the people have a more collaborative relationship.<sup>8</sup> Animals are undeniably a vulnerable population who deserve our compassion, and developing a national strategy would organically involve grassroots efforts to identify priorities and emerging issues in animal welfare.

***Recommendation 1 (Animal Welfare Expert Advisory Panel and National Animal Welfare Strategy) has successful precedence in animal welfare and other areas.***

17. The panel will build on the positive outcomes that have been achieved locally through a consultative process for animal welfare. For example:
- a. **The Multi-Stakeholder Collaboration Committee** (which consisted of MPs, members of the community, animal welfare groups, the pet industry, veterinary professionals, and AVS) was launched in 2013. The committee drafted the Code of Animal Welfare (for pet owners and the pet industry) which specifies the minimum standards for animal housing, management, and care, and was eventually issued by the former AVA.
  - b. **The Animal Welfare Legislative Review Committee** (comprising MPs and representatives from animal welfare groups, the pet industry, and the veterinary profession) was instrumental in driving the Animals and Birds (Amendment) Bill that was passed in Parliament in 2014.
  - c. **The Rehoming and Adoption Workgroup** included representatives from animal welfare groups, the pet industry (e.g. dog trainers), and the veterinary profession. It was set up in 2020 and led to the development of guidelines on dog rehoming, adoption, training, and rehabilitation.

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<sup>8</sup> OSC Secretariat. (n.d.) *Perspectives arising from Our Singapore Conversation*. <https://isomer-user-content.by.gov.sg/27/92e8bf18-edac-4fd4-9836-24a21e9d06c2/12perspectivesarisingfromoursingaporeconversationsofar.pdf>

- d. In 2011, a taskforce was convened to study cat ownership in HDB estates, culminating in the **Community and Pet Cat Management Framework** which was rolled out on 1 September 2024. It reverses a 34-year ban on cats in HDB flats and includes a mandatory licensing scheme to promote the welfare and traceability of pet cats, as well as a Trap-Neuter-Rehome/Release-Manage (TNRM) programme for community cats.
  - e. In 2022, the Urban Wildlife Working Group launched “**Our Wild Neighbours**” (OWN) in collaboration with various nature and conservation organisations to promote coexistence with Singapore's wildlife and to educate the public.
18. Outside of animal welfare, local advisory boards have provided a source of strategic advice in areas such as community development (e.g. the Community Improvement Projects Committee under MND), healthcare (e.g. the Drug Advisory Committee and Medical Technology Advisory Committee under MOH) and bioethics (e.g. the Bioethics Advisory Committee).
  19. Establishing an Animal Welfare Expert Advisory Panel could well support positive change for animals by sending a subtle yet consistent message that animal welfare is taken seriously in Singapore. Over time and in tandem with other efforts, this would elevate the perceived status of animals in our society and encourage society to treat them with kindness and respect.
  20. In other countries, similar panels have been well-established such as the Animal Welfare Board of India (1962), the Scottish Animal Welfare Commission (2006), the Animal Welfare Advisory Group in Hong Kong (1997), the Animal Welfare Advisory Council in New South Wales, Australia (ratified in 2021), and the Animal Welfare Committee in the UK (inaugurated as the Farm Animal Welfare Council in 1979). Singapore may take reference from these countries to ensure that the ambit of the Animal Welfare Expert Advisory Panel is comprehensive yet complementary with the government's purview.

***Recommendation 1 will enhance Singapore's crisis response and management in addressing the threat of zoonoses and the spread of infectious diseases.***

21. Since 2021, the One Health Coordinating Committee and Working Group has been actively engaged in preventing the introduction or escalation of infectious diseases of public health concern, including zoonoses, and in preparing for coordinated response efforts.
22. The prevention of zoonoses extends beyond public health, encompassing animal welfare as an important component that can reduce the risk of disease emergence and transmission.<sup>9</sup>
23. With its emphasis on veterinary expertise and animal welfare, the panel can provide critical support to the government in managing crises, particularly in areas such as identifying the causes of zoonotic diseases, implementing humane measures for managing or destroying infected animals to prevent disease spread, and formulating new policies to mitigate future outbreaks. A panel study had been commissioned by the National Parks Board to study the risk of zoonoses in collaboration with the National University of Singapore Saw Swee Hock School of Public Health. Such efforts can be streamlined through the establishment of this panel.

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<sup>9</sup> Racciatti, D. S., Wiemeyer, G. M., González Gracia, L. A., Blanco, C., Szmec, A., & Orozco, M. M. (2023). Links between animal welfare and "One Health": Perception and implementation in Latin America. *Frontiers in Animal Science*, 4, 1–21. <https://doi.org/10.3389/fanim.2023.1242917>

24. In this capacity, the panel will complement and enhance the ongoing efforts of the One Health Coordinating Committee.

***Conclusion on Recommendation 1***

25. Recommendation 1 involves low barriers to entry, given successful precedence both locally and in other countries. There are also existing animal welfare experts and advocates in Singapore who may be convened as panel members.
26. Implementing a national animal welfare strategy would align Singapore with global developments, facilitate greater coordination between the government and its people, and increase cross-sector partnerships to support the government's work.
27. Under the national animal welfare strategy, the panel's activities would contribute to enhanced humane education and greater legal rigour in animal cruelty and welfare cases. Education and legislation are principal levers for change.

**Recommendation 2:**

**Strengthen MOE curriculum on animal welfare**

1. The Committee recommends that the government review how students are educated on animal welfare by:
  - a. Broadening the current curriculum to include important animal welfare topics
  - b. Strengthening partnerships with animal welfare groups

***Recommendation 2a involves broadening MOE's current curriculum to include important animal welfare topics.***

2. Students currently undergo two face-to-face lessons, on responsible pet ownership and kindness towards animals.<sup>10</sup>
3. MOE has actively recognised the importance of animal welfare education and its role in developing a caring society. Academic consensus supports MOE's decision to place importance on animal welfare education as part of Character and Citizenship Education (CCE), finding that such lessons instil empathy and respect for all life forms at a young age. Research shows strong correlations between animal welfare education and increased cognitive competence, empathy, reduced hyperactivity, greater self-control, and improved reading skills.<sup>11</sup>
4. Despite MOE's education efforts, over the past three years, Singapore has seen a number of high-profile animal abuse cases committed by youths.<sup>12,13,14</sup> Strikingly, the SPCA noted a rising trend in the number of such cases.<sup>15</sup> Moreover, some studies show that up to 44% of children may have abused animals at one point or another in their childhood. These trends suggest there is room to further enhance animal welfare education to address these behaviours effectively and foster greater empathy towards animals from an early age.
5. Research indicates that early involvement in animal abuse is often linked to more serious offences later in life, including domestic violence.<sup>16</sup> A more comprehensive curriculum can address harmful behaviours early and promote empathy.
6. The Committee believes that there is room to enhance the curriculum to cover other important aspects of humane education, particularly in key topics such as (but not limited to) preventing animal cruelty and opportunities to further contribute to animal welfare.

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<sup>10</sup> From consultations with the SPCA Singapore.

<sup>11</sup> Ngai, J. T. K., Yu, R. W. M., Chau, K. K. Y., & Wong, P. W. C. (2021). Effectiveness of a school-based programme of animal-assisted humane education in Hong Kong for the promotion of social and emotional learning: A quasi-experimental pilot study. *PLoS One*, 16(3), 1–21. <https://doi.org/10.1371/journal.pone.0249033>

<sup>12</sup> Tang, L. (2023, July 28). *Boy who threw cat off HDB block issued stern warning after completing rehabilitative programme*. Channel News Asia. <https://www.channelnewsasia.com/singapore/boy-threw-cat-hdb-stern-warning-avs-rehab-programme-3660596>

<sup>13</sup> Chin, H. S. (2023, April 11). *Boy who allegedly committed obscene act on cat arrested*. The Straits Times. <https://str.sg/i4Aj>

<sup>14</sup> Incident recorded by the SPCA Singapore in 2022/23, of a youth abusing community cats.

<sup>15</sup> Chin, H. S. (2023, May 27). *SPCA enhances youth programmes amid rising concerns of animal abuse cases by young people*. The Straits Times. <https://str.sg/iJzV>

<sup>16</sup> Mota-Rojas, D., Monsalve, S., Lezama-Garcia, K., Mora-Medina, P., Domínguez-Oliva, A., Ramírez-Necoechea, R., & de Cassia Maria Gardia, R. (2022). Animal abuse as an indicator of domestic violence: One Health, one welfare approach. *Animals*, 12(8), 977. <https://doi.org/10.3390/ani12080977>

7. A more comprehensive curriculum covering these topics would enhance animal welfare outcomes by equipping students with the knowledge to prevent both intentional and unintentional harm to animals. Secondly, it would cultivate empathy in children towards all sentient beings by helping them understand the broader consequences of their actions.
8. It is proposed that MOE include a third structured lesson, on preventing animal cruelty.
  - a. “Preventing animal cruelty” will teach students how to recognise fear and stress in animals, and what to do if they suspect or witness animal cruelty.
  - b. This lesson will acknowledge that animal cruelty encompasses both acts (intentional harm), and omissions (neglect of animals). It will also cover foundational understandings of how to prevent unintentional harm, e.g. through improper feeding and handling of community animals.
  - c. This lesson will help students understand the prevalence of animal abuse cases in Singapore and emphasise the potential penalties for animal cruelty, creating a deterrent effect. This also enriches the pre-existing curriculum on responsible pet ownership since issues of neglect are discussed.
9. Research shows that more frequent, longer-term interventions correlate with better outcomes.<sup>17,18</sup> Including a third lesson will increase the frequency with which students are educated on animal welfare. This could improve the effectiveness of animal welfare education and, more broadly, moral education.
10. In addition to adding a third lesson, another way to increase the number and frequency of interventions is to expand existing efforts to integrate animal welfare concerns into other subjects (e.g. English, Science). These can serve as “refreshers” for crucial content and introduce contemporary cases.
11. If there are concerns about adding to teachers’ workloads, the Student Learning Space (SLS) online platform could be used to deliver this lesson. Content co-curated with animal welfare groups can provide interactive and relevant activities, including real-life case studies in a digital format that is easy to implement.

***Recommendation 2b involves strengthening partnerships with animal welfare groups.***

12. Partnerships with animal welfare groups can enrich students’ educational experiences in several ways through Values-in-Action (VIA) projects, guided interactions with animals, and collaborative initiatives such as an Animal Welfare Day.
13. In secondary schools, learning about animal welfare is often voluntary and takes the form of VIA projects. The Committee supports providing more animal welfare VIA opportunities, as these projects help nurture future custodians of our society’s animals. By building partnerships with animal welfare groups, MOE can enable students to undertake meaningful community projects under the guidance of subject matter experts, fostering both knowledge and passion.

<sup>17</sup> Malcarne, V. (1983). Evaluating humane education: the Boston study. *Humane Education*, 7, 12–13.

<sup>18</sup> Coleman, G. J., Hall, M. J., & Hay, M. (2008). An evaluation of a pet ownership education program for school children. *Anthrozoös*, 21, 271–284.



14. Live interactions with animals can make learning more impactful, but they must be conducted in the right way, under the supervision of experienced and trained handlers. Animal welfare groups can facilitate these carefully guided interactions to complement classroom and online learning. Such interactions, including learning journeys in collaboration with MOE schools, can help students develop empathy and a deeper understanding of animal welfare.
15. Other potential partnerships that Singapore could consider based on best practices from other countries' government interactions with animal welfare groups include:
  - a. **Austria and Tierschutz macht Schule (TmS).** The animal welfare education curriculum in Austria is devised by animal welfare groups through a government subsidy. This takes the form of engaging pre-planned activities involving both students and teachers.
  - b. **Taiwan.** Animal welfare education in Taiwan is co-created between academia and NGOs, which were part of a dedicated working group.
  - c. **Scotland.** The SPCA in Scotland provides learning materials, modules, and courses for students in primary and secondary school. Animal Welfare messaging is infused into the curriculum under Health and Wellbeing, Language education, Religious and Moral education, Social Studies, Sciences, Community Learning and Development, Mathematics, Community Resilience, and Technologies. Materials include card games, group projects, workshops, and e-learning courses.<sup>19</sup>
  - d. **Hong Kong.** The SPCA in Hong Kong has been involved in the creation of a humane education package for students, including a downloadable or DVD package with lessons, activities, and worksheets for students, covering topics including pet care, wildlife treatment, and animal protection laws.<sup>20</sup> They also conduct a six-session programme from Grades 2–3 under the CARing Kids programme.<sup>21</sup>
16. The Committee recommends MOE to partner with animal welfare groups to recognise an annual "Animal Welfare Day" in schools, potentially in conjunction with World Animal Day (4 October).
  - a. **Best Practices of the United Kingdom.** This is similar to the animal welfare month which some schools in the UK recognise, as an extension of the official National Pet Day (11 April). During animal welfare month, students, staff, and family can enjoy activities related to animal welfare.
  - b. Given research on the importance of frequent and long-term interventions, an annual animal welfare day can provide a refresher on the key concerns relating to animal welfare, thereby boosting its effectiveness.
  - c. Animal welfare groups can co-curate learning and activity materials with schools.

<sup>19</sup> Scottish SPCA. (n.d.). *Scottish SPCA and the Curriculum for Excellence*. <https://www.scottishspca.org/wp-content/uploads/2024/11/Curriculum-for-Excellence.pdf>

<sup>20</sup> The Hong Kong SPCA. (n.d.). *Humane Education Package*. <https://www.sPCA.org.hk/what-we-do/outreach/education/humane-education-package/>

<sup>21</sup> Ibid.

***Conclusion on Recommendation 2***

17. The Committee believes education to be a crucial long-term effort in an animal welfare strategy. NParks has acknowledged the importance of education and youth involvement, as inferred from its 2024 Annual Report emphasising collaborative efforts with MOE and celebrating the achievements and passion of its Youth Stewards of Nature. The Committee hopes that, similarly, animal welfare education will be refined by MOE.
18. With the efforts outlined in Recommendation 2, the Committee envisages a generation of empathetic Singaporeans with the knowledge and moral courage to be kind to all, including the life forms amongst us who cannot speak for themselves.



STRENGTHENING PROTECTIONS FOR ANIMAL WELFARE

**AREA 2** GENERAL ANIMAL WELFARE  
LEGISLATION AND POLICIES



### **Recommendation 3:**

#### **Introduce principles on animal welfare in the Animals and Birds Act and the Wildlife Act**

1. The Committee recommends inserting the following principles on animal welfare in the Animals and Birds Act and the Wildlife Act to guide the interpretation of the legislation in relation to any act done or decision made under the legislation relating to an animal:
  - a. An animal should have opportunities to access unrestricted, sufficient, species-specific, balanced, varied, and clean food and water.
  - b. An animal's environment should provide comfort through temperature, substrate, space, air, odour, noise, and predictability.
  - c. An animal should be kept in good health, and illnesses and injuries should be prevented or treated immediately and appropriately.
  - d. An animal should be able to express a full range of natural behaviours such as exploration, foraging, bonding, playing, and retreating.
  - e. An animal's positive mental states such as pleasure, comfort, or vitality should be strived towards, and negative states such as fear, frustration, hunger, pain, or boredom should be reduced.
  - f. An act done or a decision made under this Act, for or in relation to an animal, should be in accordance with the recognition that animals are sentient.
  - g. Replace the current exemption/limitation in the Animals and Birds Act (Section 42) for animals in the food industry, through establishing a code of animal welfare for animals in the food industry.

#### **Introduction to Recommendation 3**

2. Currently, the purposes of the Animals and Birds Act include “for measures pertaining to the general welfare and improvement of animals, birds or fish in Singapore”. Acknowledging animal sentience in legislation reflects a nation’s commitment to the intrinsic value and wellbeing of animals. It affirms that animals are capable of experiencing pain and suffering, as well as positive emotions like pleasure and joy.
3. While it is often said that the purpose of the animal protection laws of Singapore is to prevent cruelty to animals, prevention is achieved only indirectly through the deterrence effect of punishments meted out to cruelty perpetrators.<sup>22</sup> Because unnecessary suffering is a legal requirement (either explicitly or implicitly), the mechanism for legal protection is only triggered after the animal has already suffered from cruelty. An exception is the offence of abandonment under Section 42(1)(b) of the Animals and Birds Act,<sup>23</sup> which requires only proof that the act of abandonment is likely to cause unnecessary suffering or distress to the animal.

<sup>22</sup> See, A. W. L. (2014). Challenges in the enforcement of animal protection laws in Singapore. *Research Collection Yong Pung How School of Law*, 1–14. [https://ink.library.smu.edu.sg/sol\\_research/1304/](https://ink.library.smu.edu.sg/sol_research/1304/)

<sup>23</sup> Animals and Birds Act 1965 (2020 Revised Edition). <https://sso.agc.gov.sg/Act/ABA1965>

4. Thus, the legislation should go beyond minimising suffering and shift the perspective to acknowledging animal sentience and promoting positive wellbeing of animals in Singapore, i.e. expand those duties by requiring human caregivers to also offer animals opportunities to experience positive states.<sup>24</sup>
5. The Animals and Birds Act and the Wildlife Act set out a broad-ranging legislative framework for the protection of animals, birds, fish, and wildlife in Singapore. Articulating guiding principles for interpreting both laws will support more consistent and harmonious application of the law.
6. Principles have been enshrined in other legislation and subsidiary legislation in Singapore. These include the Children and Young Persons Act 1993, the Mental Capacity Act 2008, and the Rules of Court 2021. Notably, all three pieces of legislation relate to highly fact-specific cases where competing interests complicate the application of more general provisions. The incorporation of principles is a legal mechanism to ensure consistent and principled application of the laws across all cases.
7. Similarly, the laws under the Animals and Birds Act and the Wildlife Act are broad provisions, intended to apply to an extremely broad range of living beings. The Animals and Birds Act defines an “animal” as “any mammal (other than man) or fish and includes any other living creature that is prescribed as an animal for the purposes of this Act or that falls within a class of animals that is prescribed for those purposes”. The Wildlife Act defines an “animal” as “any mammal, bird, reptile, amphibian, fish or invertebrate, whether of a wild nature or otherwise”.
8. Scientific progress means that the scope of animals and the extent of our understanding of the animals covered under both laws continue to evolve. The provisions of the Animals and Birds Act and the Wildlife Act cannot prescribe with precision or in granular detail how the provisions are to apply to each and every species of animal covered under the laws. Accordingly, articulating broad principles for interpreting the provisions will support the consistent application of the laws across cases which may involve a very broad range of animals.
9. The principles which the Committee proposes to codify in both the Animals and Birds Act and the Wildlife Act are not novel. The principles are based on the Five Domains model of animal welfare and the recognition of animal sentience.

***Recommendation 3 aims to introduce the Five Domains model of animal welfare to the Animals and Birds Act and the Wildlife Act.***

10. The Five Domains model is a framework for assessing and ensuring the wellbeing of animals, considering both their physical and psychological needs. David Mellor and Cam Reid first conceived the Five Domains model in 1994 as a tool for assessing welfare compromise in sentient animals used in research, teaching, and testing. The Five Domains model has been updated from time to time to reflect advances in welfare science. Since its inception, the model has been applied to welfare assessment in a broad range of contexts, including research animals, farmed livestock, companion animals, and captive and free-living wildlife.

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<sup>24</sup> Sentient Animal Law Foundation. (n.d.). *The 3-word law reform advocated by SAL*. <https://www.sentientanimallaw.org/3-word-law-reform>



11. The model comprises five domains that focus on specific factors or conditions that may impact an animal's welfare. These include four physical/functional domains (nutrition, physical environment, health, and behavioural interactions) and a fifth mental/affective state domain.
  - a. **Nutrition:** This domain focuses on the animal's access to an appropriate, balanced diet that meets their nutritional needs. It ensures that the animal is free from hunger, thirst, and malnutrition, which is essential for maintaining health and wellbeing. Proper nutrition also supports the animal's ability to grow, reproduce, and perform normal biological functions.
  - b. **Environment:** This domain addresses the animal's physical surroundings, which must provide shelter, comfort, and safety. It includes factors such as temperature, humidity, ventilation, and access to appropriate resting areas. A well-maintained environment prevents discomfort and allows animals to express natural behaviours, enhancing their overall welfare.
  - c. **Health:** The health domain ensures that animals are free from injury, disease, and illness. It emphasises not only the treatment of existing health problems but also the prevention of future issues through good veterinary care, hygiene, and management practices. A healthy animal is better able to engage in natural behaviours and experience positive mental states.
  - d. **Behaviour:** This domain recognises the importance of providing animals with opportunities to express natural behaviours. It includes access to suitable social interactions (with conspecifics or humans), exercise, play, and exploration. Allowing animals to perform behaviours that are characteristic of their species contributes to their mental wellbeing and reduces frustration and boredom.
  - e. **Mental State:** The fifth domain integrates the other four physical domains to assess the animal's overall emotional and psychological welfare. It focuses on the animal's subjective experiences, including feelings of pain, distress, pleasure, and contentment. Ensuring positive mental states, such as security, comfort, and the ability to experience joy or satisfaction, is key to enhancing an animal's quality of life.
12. The Five Domains model has been incorporated into legislative frameworks such as the New Zealand's Animal Welfare Act 1999, the United Kingdom's Animal Welfare Act 2006, Australia's Model Codes of Practice for the Welfare of Animals and specific state laws such as the Animal Welfare Act 1992 (ACT), Sweden's Animal Welfare Act 2018, the Netherlands' Animals Act 2011, Germany's Animal Welfare Act (Tierschutzgesetz), Ontario's Provincial Animal Welfare Services Act 2019, Switzerland's Animal Welfare Act, and Finland's Animal Welfare Act.

***Recommendation 3 aims to recognise animal sentience in legislation.***

13. Scientific research in the last four decades has led to a review of the definition of animal sentience<sup>25</sup> and policies related to recognising animal sentience. In their Global Animal Welfare Strategy, the World Organisation for Animal Health (WOAH) recognises animal sentience in establishing their international standards for the welfare of working animals, companion animals, for production of food, fibre, and other animal products, and for scientific and educational purposes.<sup>26</sup>

<sup>25</sup> Duncan, I. J. H. (2006). The changing concept of animal sentience. *Applied Animal Behaviour Science*, 100(1–2), 11–19. <https://doi.org/10.1016/j.applanim.2006.04.011>

<sup>26</sup> World Organisation for Animal Health. (2017, May). *OIE Global Animal Welfare Strategy*. <https://www.woah.org/app/uploads/2021/03/en-oie-aw-strategy.pdf>

14. Welfare-aligned sentience recognises the capacity to consciously perceive negative or positive sensations, feelings, and emotions, and other subjective experiences that are significant to the animal. Negative and positive affective experiences can respectively compromise and enhance welfare, and both have significance in animal welfare.<sup>27,28</sup>
15. Sentience is defined as having a capacity to **consciously** perceive by the senses, or a capacity to **consciously** feel or experience subjectively.<sup>29</sup>
16. The legal recognition of animal sentience is essential to ensure comprehensive protection for animals, acknowledging their capacity to experience pain, suffering, and emotions. Many countries have taken positive steps in this direction, enacting laws that recognise animals as sentient beings deserving of care and protection.
17. Countries such as Colombia, Peru, and Chile have laws explicitly acknowledging that animals are sentient beings deserving protection. For instance, Colombia's Law 1774 (2016) recognises animals as sentient and provides legal protections against suffering, while Peru's Animal Protection and Welfare Law 30407 acknowledges the sentience of vertebrates. Similar legislative advancements have been made in Chile, where Law 20380 (2009) recognises animals as sentient.
18. In Europe, countries like the Netherlands, Sweden, France, and Austria have also recognised animal sentience through comprehensive legislation. The Netherlands' Animals Act 2011 formally recognises sentience and protects animals' intrinsic value, while Sweden's Animal Welfare Act (2018) mandates that animals be allowed to perform natural behaviours, recognising their wellbeing. In France, animals are acknowledged as sentient under the Civil Code (amended in 2015). Similarly, Austria's Animal Welfare Act (2004) recognises animals as "fellow creatures".
19. In New Zealand, the 2015 amendment to the Animal Welfare Act explicitly includes sentience, covering a broad range of animals. Other countries in the Asia-Pacific, such as India, Thailand, Malaysia, and the Philippines, have implicitly recognised animal sentience.
  - a. India's Prevention of Cruelty to Animals Act (1960) prohibits unnecessary pain and suffering, both physical and mental.
  - b. Thailand's Prevention of Animal Cruelty and Provision of Animal Welfare Act (2014) recognises the capacity of animals to suffer, both physically and mentally.
  - c. Malaysia's Animal Welfare Act (2015) recognises animals' capacity to feel pain and suffer.
  - d. The Philippines' Animal Welfare Act (1998), amended in 2013, prohibits causing unnecessary pain, fear, and distress to animals, thereby acknowledging their capacity to suffer.

<sup>27</sup> Hemsworth, P. H., Mellor, D. J., Cronin, G. M., & Tilbrook, A. J. (2014). Scientific assessment of animal welfare. *New Zealand Veterinary Journal*, 63(1), 24–30. <https://doi.org/10.1080/00480169.2014.966167>

<sup>28</sup> Mellor, D. J. & Beausoleil, N. J. (2015). Extending the 'Five Domains' model for animal welfare assessment to incorporate positive welfare states. *Animal Welfare*, 24(3), 241–253. <https://doi.org/10.7120/09627286.24.3.241>

<sup>29</sup> Mellor, D. J. (2019). Welfare-aligned Sentience: Enhanced Capacities to Experience, Interact, Anticipate, Choose and Survive. *Animals*, 9(7), 440. <https://doi.org/10.3390/ani9070440>

***Recommendation 3 incorporates the Five Domains model and animal sentience as principles in legislation.***

20. Incorporating principles based on the Five Domains of animal welfare into Singapore's legislation would align with the broader approach of embedding key principles into legal frameworks, as seen in existing laws such as the Children and Young Persons Act, the Mental Capacity Act, and the Rules of Court.
21. The Mental Capacity Act provides a useful precedent for introducing such guiding principles. Under this Act, individuals are presumed to have capacity unless proven otherwise, and decisions made on their behalf must be taken in their best interests. This principle of respecting autonomy while ensuring protection where needed is similarly relevant in animal welfare. Animals, as sentient beings, cannot make decisions regarding their own welfare, and the law should ensure that their best interests are the primary concern.
22. The Children and Young Persons Act includes two guiding principles — that the parents of the child or young person have the primary responsibility for the care and welfare of the child or young person, and that they should discharge their responsibilities to promote said welfare.
23. The Rules of Court contain ideals which guide parties and the court in the conduct of civil proceedings.
24. By enshrining guiding principles within the legislation, the Court and enforcement authorities are provided with guidance on the intended spirit of the legislation. This allows for the provisions of the Animals and Birds Act and the Wildlife Act to be interpreted in a manner that is consistent with these overarching principles. Importantly, as these principles are not intended to be applied in a formulaic manner, they are flexible enough to encompass the different ways in which the legislation may apply to different animals covered under the laws.
25. Furthermore, in *Public Prosecutor v Ling Chung Yee Roy* (2013),<sup>30</sup> the judge decided that:  
  
**“I am of the view that unnecessary suffering is not the same as the dog was sick or physically injured. I agree with PW7’s view that the welfare of the dog is not dependent on whether the dog is healthy or not.** This is consistent with the preamble of the said Act which is to provide for among other things, the prevention of cruelty to animals and for measures pertaining to the general welfare. My view is also consistent with the opinion expressed by the various veterinarians that testified on behalf of the Prosecution. Dr Kang Nee (PW9), a certified dog trainer and a specialist in dog behaviour, **stated clearly that the dog can be stressed by being exposed to the elements for a long time...I think any reasonable person would no doubt conclude that this constitutes suffering and it is unnecessary.**” (Our emphasis in bold)
26. In *PP v Ling Chung Yee Roy*, the judge acknowledged that mental suffering raised by both veterinarian witnesses were sufficient to constitute suffering by the dog. To acknowledge an animal’s capacity to emotionally and mentally suffer in this case serves as a good foundation for recognising sentience in animal welfare legislation.

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<sup>30</sup> *Public Prosecutor v Ling Chung Yee Roy* [2013] SGDC 252.

#### **Recommendation 4:**

#### **Increase penalties for offences under the Animals and Birds Act on neglect of and cruelty to animals**

1. The Committee recommends increasing the penalties for the following offences under the Animals and Birds Act:
  - a. Importing or transshipping an animal without a licence – Section 8(1)
  - b. Failure by animal owners to meet the duty of care – Section 41C
  - c. Cruelty to animals – Section 42(1)
2. The Committee also recommends considering long-term rehabilitation plans to provide alternative sentencing options where increased penalties alone may not effectively deter animal abuse and cruelty.

#### **Introduction to Recommendation 4**

3. In November 2014, the Animals and Birds Act was amended to reflect growing concern for animal welfare. Then-MP Yeo Guat Kwang (Ang Mo Kio) stated<sup>31</sup>:
 

“Cases are also growing in complexity, and shifting away from the black and white of clear-cut acts of cruelty to increasingly grey areas of neglect or infringements of animal welfare. Challenges in enforcement also have emerged, as it is currently difficult to actually take action – be it punishment or prevention – without strong evidence of cruelty and witnesses who are willing to come forward to testify in Court. **To strengthen the legislation in line with a socially gracious and harmonious society, we need to move the regulatory controls upstream.**” (our emphasis in bold)
4. Following this statement, the amendments to the Animals and Birds Act introduced several key changes. These included stricter penalties for animal cruelty offences, clearer definitions of what constitutes neglect, and expanded powers for authorities to intervene in cases where animals are at risk.
5. By moving regulatory controls upstream, the government sought to create a more robust framework for both preventing cruelty and addressing the more nuanced cases of neglect that had become increasingly prevalent.
6. From 2019 to 2023, the AVS consistently received about 1,250 cases of alleged animal cruelty each year, including feedback from the SPCA. Between 2019 and 2022, an average of about 60 cases per year, or 5% of the total, were found to be related to animal cruelty.<sup>32</sup>
7. It was also acknowledged that there were challenges in investigating cases, such as a lack of eyewitnesses or direct evidence which may pose difficulties in prosecution.
8. Separately, the SPCA investigated a total of 915 cases in 2023 and 511 cases in 2022:

<sup>31</sup> Parliament of Singapore. (2014, November 4). *Animals and Birds (Amendment) Bill*. Second reading bills. <http://sprs.parl.gov.sg/search/#/sprs3topic?reportid=bill-125>

<sup>32</sup> Parliament of Singapore. (2023, February 22). *Proposal for enforcement powers under Animal and Birds Act to be given to selected non-government animal welfare groups*. Oral answers to questions. <https://sprs.parl.gov.sg/search/#/sprs3topic?reportid=oral-answer-3079>

- a. **Welfare and neglect:** 61.2% (558 cases)
  - b. **Abuse and cruelty:** 38.8%
  - c. **Abandonment:** 137 cases, involving 285 animals
9. Given the spike in animal cruelty and welfare cases (likely to reach a 12-year peak in 2024)<sup>33,34</sup> and a 10-year window since the Animals and Birds Act was last reviewed, it is timely to revisit the penalties to assess if they serve as sufficiently strong deterrents.
10. The Committee proposes these amendments:

Offence	Current Penalty in the Animals and Birds Act <sup>35</sup>	Proposed Amendment
<b>Under Section 8(1)</b>		
First-time offenders who illegally import animals	Fine not exceeding \$10,000 and/or imprisonment not exceeding 12 months	Increase to a fine not exceeding \$50,000 per specimen of the species (but not exceeding \$500,000 for, or the market value (at the material time of the offence) of, all the specimens of that species, whichever is higher) and/or imprisonment not exceeding 4 years.  This aligns with the Endangered Species (Import and Export) Act 2006 Section 4(1).
Recalcitrant offenders who illegally import animals	N.A.	Introduce penalties to serve as a strong deterrent. Consider barring foreigners who repeatedly import animals across borders.
Buyers of pets from illegal sources	N.A.	Introduce penalties to disrupt the demand
<b>Under Section 41C</b>		
Pet owners	For a first offence, fine not exceeding \$10,000 and/or imprisonment not exceeding 12 months.	Increase the fine and jail sentence

<sup>33</sup> Tan, J. (2024, June 20). *Battling crimes against animals is a marathon, not a sprint: SPCA executive director*. The Straits Times. <https://str.sg/p8pW>

<sup>34</sup> Woon, W. (2024, January 23). *Over 30 cases of pet animal, wildlife smuggling detected in 2023*. The Straits Times. <https://str.sg/gpDm>

<sup>35</sup> Animals and Birds Act 1965 (2020 Revised Edition). <https://sso.agc.gov.sg/Act/ABA1965>



	For a second or subsequent offence, fine not exceeding \$20,000 and/or imprisonment not exceeding 2 years.	
Pet businesses	<p>For a first offence, fine not exceeding \$40,000 and/or imprisonment not exceeding 2 years.</p> <p>For a second or subsequent offence, fine not exceeding \$100,000 and/or imprisonment not exceeding 3 years.</p>	Increase the fine and jail sentence
<b>Under Section 42(1)</b>		
Individual offenders	<p>For a first offence, fine not exceeding \$15,000 and/or imprisonment not exceeding 18 months.</p> <p>For a second or subsequent offence, fine not exceeding \$30,000 and/or imprisonment not exceeding 3 years.</p>	Increase the fine and jail sentence
Pet businesses	<p>For a first offence, fine not exceeding \$40,000 and/or imprisonment not exceeding 2 years.</p> <p>For a second or subsequent offence, fine not exceeding \$100,000 and/or imprisonment not exceeding 3 years.</p>	Increase the fine and jail sentence

**Table 1:** Proposed amendments to penalties under the Animals and Birds Act.

**Breaches of welfare standards harm animals and create significant costs for society.**

**Under Section 8(1):**

11. Offences against animals such as illegal importation and neglect pose serious threats to public health and safety. These include the transmission of zoonotic diseases (e.g. rabies, the filovirus haemorrhagic fevers, tuberculosis, and highly pathogenic avian influenza), especially if the animals are smuggled precisely because they have been banned from trade due to known health risks.<sup>36</sup>
12. Furthermore, many illegally imported animals originate from Malaysia, categorised as a Schedule III country in Singapore's rabies risk categorisation.<sup>37</sup> If they carry the rabies virus, this will undo Singapore's efforts to stay rabies-free since 1953, exposing both humans and local animals to widespread infection.
13. Offences can be of a large magnitude since many animals are impacted within a single shipment.
14. For example, in October 2022, 26 dogs and a cat were smuggled from Malaysia to Singapore.<sup>38</sup> They were placed in boxes, containers, and laundry bags stowed in various compartments of a lorry. One dog died from asphyxiation, while 18 others died from a highly contagious virus that can cause gastrointestinal disease. The offender admitted to smuggling an average of seven to 27 animals into Singapore twice or thrice a month,<sup>39</sup> which would amount to a monthly upper limit of 81 animals. Based on the payment of \$75 for each successfully smuggled live animal, and assuming one year of operations as the offender was first recruited sometime in 2021 and caught in October 2022, he would have earned \$36,000 even if half the animals had perished. The maximum penalty of \$10,000 pales in comparison and, without subsequent restrictions on border entry, the offender may resume his smuggling operations once any jail term (maximum of 12 months) has been served.
15. Considering the suffering inflicted on the animals and the potential costs to society, illegal importation should be met with higher penalties. These must exceed the profits from smuggling and be commensurate with the number of animal victims in order to be effective. Together with tighter enforcement (e.g. more frequent random checks and mandatory border screening of known past offenders), would-be smugglers are more likely to be deterred by the high chance and cost of being caught.
16. In addition to targeting illegal importation at the point of supply, it is crucial to arrest the demand for smuggled animals by imposing penalties on the buyers. This would cast a wider enforcement net by covering both sides of the transaction.

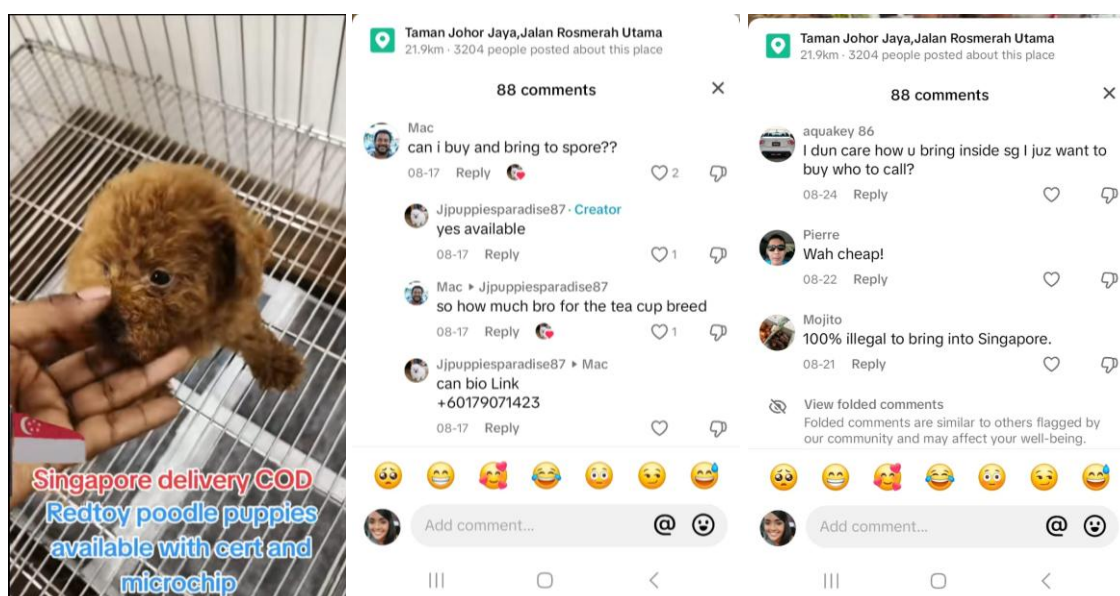
<sup>36</sup> Pavlin, B. I., Schloegel, L. M., & Daszak, P. (2009). Risk of importing zoonotic diseases through wildlife trade, United States. *Emerging Infectious Diseases*, 15(11), 1721–1726. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2857234/>

<sup>37</sup> Animal & Veterinary Service, NParks. (n.d.). *Preparing to bring dogs and cats into Singapore*. Retrieved August 23, 2024, from <https://www.nparks.gov.sg/avs/pets/bringing-animals-into-singapore-and-exporting/bringing-in-and-transshipping-dogs-and-cats/preparing-to-bring-dogs-and-cats-into-singapore>

<sup>38</sup> Chua, N. (2023, April 24). *Lorry driver who smuggled animals from Malaysia into S'pore gets jail; 19 dogs died*. The Straits Times. <https://str.sg/ioJM>

<sup>39</sup> Public Prosecutor v Gobysuwaran Paraman Sivan [2023] SGMC 23.

17. There has also been a growing trend of pet shops in Malaysia exclusively advertising to Singaporean buyers. What is of even greater concern is that these shops promote false information, misleading potential buyers by suggesting that the animals are legal for purchase simply because they are microchipped, thereby allaying any concerns about the legality of their acquisition.
18. These videos attract numerous potential pet buyers who may unknowingly purchase pets from illegal sources. To address this, it is also crucial to intensify public education and awareness efforts. This could involve increasing social media outreach to inform the public about the risks and legalities of cross-border pet purchases, displaying posters that highlight the illegality of buying animals without proper quarantine checks, and enhancing collaboration with social media platforms to include warning notices that these actions may be illegal.



**Fig. 2:** Example of puppies being sold online, with the offer of being transported from Johor Bahru (Malaysia) to Singapore. Screenshot from TikTok [@jipuppiesparadise87](https://www.tiktok.com/@jipuppiesparadise87).

#### Under Sections 41C(2) and 42(1) for pet businesses:

19. The number of pet owners in Singapore has grown tremendously.<sup>40</sup> This has led to a booming pet industry where supply and demand have outstripped the regulations governing such businesses.
20. Stricter penalties are needed to hold the pet industry sufficiently accountable. These would deter businesses from providing unsafe or unproven services and punish them for breaching animal welfare standards through negligence or abuse.

<sup>40</sup> Lee, L. (2023, June 16). *The Big Read: 'Part of the family' — the rising status of pets among households and what it means for society*. TODAY. <https://www.todayonline.com/big-read/big-read-singapore-pets-family-status-society-2194571>

**Under Sections 41C(2) and 42(1) for pet owners or individual offenders:**

21. When animals are neglected or abused, the cost of their care — such as shelter, medical treatment, and rehabilitation — is often borne by animal welfare groups. For example, the SPCA requires about \$4 million annually (up from \$3 million in 2021), coinciding with the increase in animals being surrendered or abandoned with pre-existing health conditions requiring medical attention. Imposing stricter penalties on the offending pet owners or individuals would hold them to greater accountability, and perhaps defray the increased financial burden placed on the organisations that undertake the care of these animals.
22. The current penalties for failure in duty of care or cruelty to animals may not adequately reflect the transferred burden of care. The following are examples of costs incurred in neglect or cruelty cases:
  - a. **Neglect.** In March 2024, a man was given a composition fine of \$1,000 for leaving his dog's maggot-infested wound untreated.<sup>41</sup> This was revised upwards to \$4,500 only because he did not pay the first fine. It is notable that the penalty for not paying the initial fine exceeded the penalty for neglecting his dog. The initial fine of \$1,000 also scarcely covered the veterinary fee of \$4,000 borne by an animal welfare group to treat the maggot infestation, and the dog went on to birth eight puppies who were taken in by the animal welfare group and incurred further costs.
  - b. **Neglect and abandonment.** In July 2024, a 10-year-old Shih Tzu was rescued by the SPCA after being found in extremely poor condition (completely blind, poor skin, and chronic heart disease needing regular fluid draining to reduce laboured breathing). The Shih Tzu was not microchipped, and no owners came forward to claim her. Medical procedures included an x-ray, echocardiogram, and thoracenteses which could cost up to \$2,750 depending on the specific clinic and the presence of any complications. It excludes hospitalisation, medication, and daily care.
  - c. **Hit-and-run.** In August 2024, a community dog at Tuas sustained fractures to his face after a hit-and-run.<sup>42</sup> The veterinary fees were estimated at \$20,000, with Causes for Animals calling for donations to fund the amount.

***By better reflecting the costs to animals and society, Recommendation 4 will set up a stronger deterrent against animal neglect, cruelty, and illegal importation.***

23. The pressing need for a strong deterrent becomes apparent when considering the implications of our animal protection laws, as laid out in (a) to (c) below. Given that the punishments are retrospective and that the current state of animal-related licensing makes it easy for offenders to evade the law, the perceived costs of getting caught must be significantly higher to offer tangible deterrence.
  - a. "... prevention is achieved only indirectly through the deterrence effect of punishments meted out to cruelty perpetrators. **Because unnecessary suffering is a legal requirement (either**

<sup>41</sup> Tham, A. (2024, May 17). *Man fined after failing to send Pulau Ubin dog with maggot-infested wound to vet for treatment*. Channel News Asia. <https://www.channelnewsasia.com/singapore/man-fine-ban-pets-unnecessary-pain-pulau-ubin-dog-animal-abuse-4343976>

<sup>42</sup> Ong, N. (2024, August 13). *Stray dog at Tuas suffers fractures to face after alleged hit-&-run, donations needed for S\$20,000 treatment*. Mothership. <https://mothership.sg/2024/08/da-bai-dog-tuas-hit-and-run/>

**explicitly or implicitly), the mechanism for legal protection is only triggered after the animal has already suffered from cruelty.”<sup>43</sup> (our emphasis in bold)**

- b. “Sir, the existing Animals and Birds Act focuses on preventing cruelty to animals. However, punishment is usually meted out only after cruelty has been done and there is little the authorities can do beyond advising better care or warning potential offenders – before such acts are committed. Much emphasis is also placed on the Government to be the sole protector of animal welfare, when it really should be a shared social responsibility. **The key guiding principles in our legislative review were therefore to make the legislation more responsive and preventive, in addressing the welfare of the animals in the way that they are cared for, as well as to instil responsible and appropriate behaviour in all stakeholders who play a part in an animal's life cycle.”<sup>44</sup> (our emphasis in bold)**
  - c. In *Public Prosecutor v Lu Meihua* (2017), “AVA submitted that they took cases of abandonment of animals very seriously. They submitted that in 2016 there had been 13 reported cases of abandonment of animals of which only three were able to proceed to a prosecution. There was a marked increase in 2017 as in the first six months, there had been 25 reported cases of abandonment of animals and only five had proceeded to prosecution. **They submitted that these offences were very difficult to detect and that there was a need for strong deterrent message to be sent to the public that offences of this nature would not be tolerated.**”<sup>45</sup> (our emphasis in bold)
24. Furthermore, one of Singapore’s sentencing principles is deterrence, both against reoffending and against the commission of similar offences by others.<sup>46</sup> Such a proactive approach has been articulated in cases involving animal victims:
- a. “It is therefore clear that the principle of sentencing would be one of deterrence, to ensure that no one treats animals in such a manner.”<sup>47</sup>
  - b. “Cruelty to animals, especially where extreme pain and suffering have been caused should be met with the strongest disapprobation from the Courts. There is no place for such behaviour in our civilised society.”<sup>48</sup>
25. Considering international benchmarks, there is reasonable leeway for Singapore to revise its penalties upward to better reflect the costs of animal mistreatment without seeming excessive. For example, the penalties may range up to \$500,000 in fines and up to five years of imprisonment in countries that lead in animal protection (e.g. Australia, New Zealand, Canada, United States, Europe, and Hong Kong).<sup>49</sup>

<sup>43</sup> See, A. W. L. (2014). Challenges in the enforcement of animal protection laws in Singapore. *Research Collection Yong Pung How School of Law*, 1–14. [https://ink.library.smu.edu.sg/sol\\_research/1304/](https://ink.library.smu.edu.sg/sol_research/1304/)

<sup>44</sup> Parliament of Singapore. (2014, November 4). *Animals and Birds (Amendment) Bill*. Second reading bills. <http://sprs.parl.gov.sg/search/#/sprs3topic?reportid=bill-125>

<sup>45</sup> *Public Prosecutor v Lu Meihua* [2017] SGMC 57, at [8].

<sup>46</sup> Ministry of Home Affairs & Ministry of Law, Singapore. (n.d.) *Sentencing in Singapore*. <https://www.mha.gov.sg/docs/default-source/cc-doc/guide-on-sentencing-in-singapore.pdf>

<sup>47</sup> *Public Prosecutor v Yeo Wee Soon* [2020] SGDC 18, at [20].

<sup>48</sup> *Public Prosecutor v Yeo Poh Kwee* [2017] SGMC 72, at [39].

<sup>49</sup> Parliament of Singapore. (2014, November 4). *Animals and Birds (Amendment) Bill*. Second reading bills. <http://sprs.parl.gov.sg/search/#/sprs3topic?reportid=bill-125>



26. There is also local precedence as Singapore, with compelling reasons, amended its Animals and Birds Act in 2014 to include higher fines for first-time offenders (from \$10,000 to \$30,000), longer jail terms for first-time offenders (from 12 months to 3 years), and harsher penalties for repeat offenders (up to \$100,000 and a maximum jail term of 10 years). Compelling reasons have once again emerged due to the changing nature of human-animal interaction, increase in cost of animal care, and the rising number of animal mistreatment cases.
27. In areas beyond animal welfare, strict laws and robust enforcement have been credited for keeping crime low in Singapore, as in the case of drug offences.<sup>50</sup> The situation for our animals may similarly improve with such measures.

***Inclusion of alternative sentencing options to offer long-term rehabilitation where appropriate***

28. However, it is important to note that heavy punishment does have its limits, and it has been acknowledged that “we will have to explore more plausible solutions stemming from a moral conscience rather than solely from a legal perspective”.<sup>51</sup>
29. In fact, it is arguable that simply increasing the penalties for animal abusers across the board alone will not necessarily deter such behaviour either.<sup>52</sup>
30. Beyond the imposition of fines and jail terms, it is important to consider other options that offer greater long-term rehabilitative prospects, while also providing immediate protection for other animals such offenders may come across.
31. Disqualification orders are discussed in **Recommendation 5**.
32. Mandatory Treatment Orders (MTOs) are generally issued where the accused is suffering from a psychiatric condition which contributed to the offence(s). The condition must be susceptible to treatment. In relation to animal abuse offences, limited MTOs have been ordered by the Court<sup>53</sup>:

Year	Number of MTOs
2018	1
2019	1
2020	0
2021	0
2022	1

**Table 2:** Number of MTOs ordered by the Court from 2018 to 2022.

<sup>50</sup> Chua, N. (2021, December 7). *Tough laws, death penalty pivotal in keeping number of drug abusers low: PM Lee*. The Straits Times. <https://str.sg/3xRU>

<sup>51</sup> Parliament of Singapore. (2014, November 5). *Animals and Birds (Amendment) Bill*. Second reading bills. <https://sprs.parl.gov.sg/search/#/sprs3topic?reportid=bill-126>

<sup>52</sup> Kahan, D. M. (1997). Social influence, social meaning, and deterrence. *Virginia Law Review* 83(2), 349–395. <https://www.ojp.gov/ncjrs/virtual-library/abstracts/social-influence-social-meaning-and-deterrence>

<sup>53</sup> Parliament of Singapore. (2023, March 20). *Mandatory Treatment Orders issued in animal cruelty and abuse cases*. Written answers to questions. <https://sprs.parl.gov.sg/search/#/sprs3topic?reportid=written-answer-13079>

33. There have been calls for increased use of MTOs in relation to animal abuse cases for sustained and long-term intervention.<sup>54,55</sup> However, MTOs are not without limitations:
- a. Where clinical treatment for mental issues appears to be limited, an MTO may not be useful. This was observed in the case of *Public Prosecutor v Hooi Yin Wang David* (2006):
    - i. “As pointed out by the prison psychologist the accused’s intellectual functioning is within the “extremely low” to “borderline” range **and there is a real risk that the accused may engage in cruel acts of animal abuse in the future.** Clinical treatment for such behaviour is said to be limited. In the circumstances, **where possible, animal welfare organisations and public-spirited volunteers who have special interest in the welfare and care of animals may wish to constructively engage the accused, upon his release from prison, in their activities and programs that may help him to overcome his behaviour towards animals.**”<sup>56</sup> (our emphasis in bold)
    - ii. However, it raises the question of whether the responsibility of managing such cases should fall to animal welfare organisations or public-spirited volunteers who may not possess the necessary expertise to handle the rehabilitation of an individual with intellectual disability.
  - b. Lack of motivation to comply with treatment is another limiting factor.
    - i. In *Public Prosecutor v Yeo Wee Soon* (2020), the Court considered the appropriateness of various punishments, including an MTO, because the accused “had been diagnosed to be suffering from obsessive compulsive disorder and alcohol use disorder.”<sup>57</sup>
    - ii. However, it was found that an MTO would not be suitable as “the Accused **had displayed lack of motivation to be in treatment for his problems** with alcohol abuse as he tried to attribute it to conflict with his parents and neck pain. Dr Guo also found that his parents are unlikely to be able to ensure his compliance with treatment due his disobedient behaviour. As such, Dr Guo found that the Accused was not suitable for a MTO.”<sup>58</sup> It was also stated that “the Accused **had shown some resistance to counselling** and all sorts of case management by Singapore Association for Mental Health (“SAMH”) and it was difficult to engage him due to his personality, mental illness and alcoholism. However, the Accused would call SAMH occasionally to discuss his problems. The DRO report identified his risk factors as his thinking supportive of crime, alcohol dependency, poor coping skills in dealing with stress and strained relationship with his parents.” (our emphasis in bold)
34. However, as an alternative in cases where an accused may not qualify for an MTO, a similar type of rehabilitation plan may still be made available where counselling and therapy are thoughtfully

<sup>54</sup> Parliament of Singapore. (2020, March 25). *Wild Animals and Birds (Amendment) Bill*. Second reading bills. <https://sprs.parl.gov.sg/search/#/sprs3topic?reportid=bill-436>

<sup>55</sup> Parliament of Singapore. (2022, November 9). *Including Mandatory Treatment Order in sentencing options for animal cruelty and abuse cases*. Written answers to questions. <https://sprs.parl.gov.sg/search/#/sprs3topic?reportid=written-answer-12067>

<sup>56</sup> *Public Prosecutor v Hooi Yin Wang David* [2006] SGDC 204, at [23].

<sup>57</sup> *Public Prosecutor v Yeo Wee Soon* [2020] SGDC 18, at [28].

<sup>58</sup> *Public Prosecutor v Yeo Wee Soon* [2020] SGDC 18, at [32].

used in tandem with other non-custodial and financial orders. In *Public Prosecutor v Yeo Wee Soon* (2020), the accused was found suitable to undergo a Day Release Order and a Community Service Order. Reasons for this included the accused's attempts to comply with treatment and counselling for the "last several years", and the caveat that "the DRO regime will require him to continue with mental health treatment as well as counselling with National Addictions Management Services for his alcohol dependency."<sup>59</sup>

***Beyond protecting our animals, Recommendation 4 would also have positive spillover effects into human welfare.***

35. Research has established an indisputable link between animal cruelty and other behaviours of concern. In a systematic review of 32 studies from 1995–2017,<sup>60</sup> animal cruelty by non-institutionalised persons was correlated with shoplifting, harassment, forcing sexual acts, and serious violence (e.g. vandalism, serious property offences, and robbery). For institutionalised adults with a history of chronic animal cruelty, this was often followed by repeated acts of interpersonal aggression.
36. The same review found that children and adolescents who were cruel to animals tended to also be embroiled in peer problems, sexual abuse experiences, bullying, and delinquency. When the first instance of animal abuse occurred at a younger age, this was associated with greater recurrence of interpersonal violence.
37. Cases in Singapore have demonstrated a link between animal cruelty and human-directed violence:
  - a. Tan Pwee Sin (aged 70+) has served multiple jail terms since his early 30's. His offences include fatally slashing a neighbour's cat, making death threats to a child, harbouring stolen property, and culpable homicide for killing an elderly neighbour with a metal bar.<sup>61</sup>
  - b. Rico Wong was aged 30 when he, out of anger at his wife, threw their kitten against the cupboard and floor, then disposed of the bleeding and motionless body down 11 floors in the rubbish chute. He later robbed a teenager at knifepoint, adding to his history of snatch theft and domestic violence.<sup>62</sup>
  - c. Ralph Wee was a teenager at 19 years old when he made the news by doing a backflip in a rhino pen at the Singapore Zoo. His other offences include drug and alcohol abuse, running away from home, reoffending while on bail, and using frogs as targets on a foosball table (he then cut up one of the deceased frogs and threw the remains away).<sup>63</sup> He was expelled from several schools when younger and did not respond to any interventions.

<sup>59</sup> *Public Prosecutor v Yeo Wee Soon* [2020] SGDC 18, at [36].

<sup>60</sup> Longobardi, C. & Badenes-Ribera, L. (2019). The relationship between animal cruelty in children and adolescent and interpersonal violence: A systematic review. *Aggression and Violent Behavior*, 46, 201–211. <https://doi.org/10.1016/j.avb.2018.09.001>

<sup>61</sup> The Straits Times. (2017, August 29). *Man once jailed for culpable homicide, admits to threatening boy, killing neighbour's cat.* <https://str.sg/3bgZ>

<sup>62</sup> Lam, L. (2020, Oct 22). *Jail, caning for man who threw kitten down rubbish chute, robbed teen at knifepoint.* Channel News Asia. <https://www.channelnewsasia.com/singapore/man-threw-kitten-down-rubbish-chute-robbed-teen-971621>

<sup>63</sup> Lam, L. (2021, December 20). *Teen gets reformative training for crimes including rhino pen trespass and frog killing.* Channel News Asia. <https://www.channelnewsasia.com/singapore/teen-ralph-wee-trespass-rhino-kill-frog-cannabis-reformative-training-2391036>

38. Given that animal cruelty frequently co-occurs with other offences and may even be an early indicator (or rehearsal) of troubling behaviour, it may be remiss to maintain the legal status quo despite such clear trends. Increasing the penalties not only safeguards our animals but can also arrest criminal behaviour upstream by sending a firm and consistent signal that animal mistreatment is not tolerated.

***Increasing the penalties for animal cruelty aligns with other laws that seek to protect vulnerable groups and enforce accountability.***

39. Penalties for human-directed offences have been strengthened in recent years, such as the Criminal Law Reform Bill passed in 2019 to better protect vulnerable victims amid emerging crime trends.<sup>64</sup> Elevating the consequences for animal cruelty would ensure that our legal system consistently upholds the principle of safeguarding all sentient beings, especially as animals are becoming an integral part of society.
40. Harsher penalties for animal neglect will also discourage the cavalier purchase of pets and protect vulnerable animals from irresponsible pet ownership.

***Conclusion on Recommendation 4***

41. Recommendation 4 proposes increased penalties for breaches in animal welfare standards as they relate to the importation or transshipping of animals without a licence, failure by owners to meet the duty of care, and cruelty to animals.
42. Beyond safeguarding our animals, stricter penalties would better reflect the significant costs to society if the respective welfare standards were breached, offer a stronger deterrent against animal mistreatment, and bring our animal welfare laws into greater alignment with other laws that seek to protect vulnerable victims.
43. Offering long-term rehabilitation plans as alternative sentencing options would complement stricter penalties by addressing animal mistreatment upstream.
44. There would also be positive spillover effects into human welfare, given the frequent co-occurrence of animal cruelty with other types of troubling behaviour.

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<sup>64</sup> Ministry of Home Affairs. (2019, May 6). *Parliamentary speeches. Second Reading of Criminal Law Reform Bill – Speech by Mr K Shanmugam, Minister for Home Affairs and Minister for Law.* <https://www.mha.gov.sg/mediaroom/media-detail/second-reading-of-criminal-law-reform-bill---speech-by-mr-k-shanmugam-minister-for-home-affairs-and-minister-for-law>

**Recommendation 5:**

**Increase disqualification period for owning an animal or carrying out an animal-related business in cases of non-compliance with the Animals and Birds Act**

1. The Committee recommends lengthening the disqualification period for owning animals or carrying out animal-related businesses in cases of non-compliance with the Animals and Birds Act.
2. This includes:
  - a. Expanding the range of disqualification periods to better reflect the severity of the offences
  - b. Introducing a permanent disqualification order for recalcitrant offenders who have repeatedly inflicted serious harm on animals

***Introduction to Recommendation 5***

3. A disqualification order under Section 43B of the Animals and Birds Act prohibits an individual from owning, keeping, or working with animals for a specific period. It aims to protect animals by preventing a person who has mistreated or neglected them from having further contact with them.
4. Courts are empowered to impose disqualification orders for up to 12 months for serious cases of animal abuse/neglect. Failure to comply with these orders can result in a fine of up to \$5,000 and/or imprisonment for up to 6 months.
5. The Committee believes that this is incongruent with the seriousness of animal abuse cases where disqualification orders are issued. Furthermore, it may not provide sufficient time for meaningful reform and behavioural change.
6. The Animals and Birds Act<sup>65</sup> outlines the enforcement provisions for acts of animal cruelty in Section 43B. The relevant sections are:
  - a. **Section 41C**, which outlines the duty of care that every animal owner must uphold, including providing essential needs such as food, shelter, and water. Owners must not subject animals to unnecessary pain or suffering, protect them from injury and disease, avoid abandonment, and ensure their care is in accordance with prescribed codes of animal welfare.
  - b. **Section 42**, which prohibits causing physical or psychological harm to animals. This includes acts of physical abuse, using animals for labour, and involving them in animal fights.
  - c. **Section 43 (1)**, which mandates that any person carrying out an animal-related business must not employ or engage individuals to perform any activity relating to animals unless the individuals hold qualifications or complete relevant training that is specified by the Director-General.

***Limitations of the current disqualification order in reflecting the severity of cases***

7. Deterrence may be broken down into two aspects:

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<sup>65</sup> Animals and Birds Act 1965 (2020 Revised Edition). <https://sso.agc.gov.sg/Act/ABA1965>



- a. Specific deterrence intended to deter the offender from committing similar offences in future
  - i. In *Public Prosecutor v Lu Meihua* (2017), where the accused had abandoned her dog, the Court found that a “deterrent sentence was necessary to serve as a warning to Ms Lu, that whilst she would not be precluded from owning animals in the future, she had to ensure that she curbed any inhumane behaviour towards animals”. It further found that “if she chose to own pets in the future then she had to realise that she had a legal responsibility to provide proper care for the pets” and that “a sufficiently high fine coupled with a short disqualification from owning any pets would deter Ms Lu from repeating this offence”.<sup>66</sup>
  - ii. In addition to the deterrent effect of a short disqualification order, the Court found that a disqualification order would allow the offender “time to reflect and be more circumspect when getting a pet in the future”.<sup>67</sup>
  - iii. In the context of businesses, it carries an additional retributive element. It “also seeks to punish the [accused] for [their] negligence, protect other animals and their owners by disqualifying [the accused] from being a person in charge of any animal in the course of [their] employment with any animal-related business for a period of time”.<sup>68</sup>
- b. General deterrence intended to signal to the public that these types of offences will attract the disapproval of the court
  - i. This concept was again addressed in *Public Prosecutor v Lu Meihua* (2017) at [16]: “I accepted the Prosecution’s submission that there was an increase in the abandonment of pets between 2016 and 2017. In fact there was almost a two-fold increase in the number of abandonment cases in the first six months of 2017 when compared to the whole of 2016. It was also clear that the AVA had a lot of difficulty in prosecuting these cases as only one fifth of the cases had resulted in prosecutions. This was precisely one of the issues that was highlighted by the Member of Parliament during the Second Reading of the Animals and Birds Amendment Bill. Therefore, **I found that there was clearly a need for general deterrence to send a message to the public that abandonment of pets would not be tolerated.** Again I found that a high fine coupled with a short disqualification order would meet the needs of general deterrence.”<sup>69</sup> (our emphasis in bold)
  - ii. Deterrence is also intended to apply to businesses which, as stated above, may be considered to have a greater responsibility to maintain a standard of care for the animals left in their charge: “The imposition of a disqualification would also send an effective signal to others involved in animal-related businesses of the standards with which they have to maintain in the industry... **The imposition of a disqualification serves as a general deterrence to persons involved in animal-related businesses**

<sup>66</sup> *Public Prosecutor v Lu Meihua* [2017] SGMC 57, at [15].

<sup>67</sup> *Public Prosecutor v Lu Meihua* [2017] SGMC 57, at [22].

<sup>68</sup> *Sabrina Sim Xin Huey v Public Prosecutor* [2022] SGHC 240, at [27].

<sup>69</sup> *Public Prosecutor v Lu Meihua* [2017] SGMC 57, at [16].

**who may be tempted to be lackadaisical in their standard of care of animals left in their charge.”<sup>70</sup> (our emphasis in bold)**

8. Generally and according to the statute, disqualification orders are deemed appropriate in any case and there is no requirement for them to be meted out only “in the most serious cases of animal abuse”.<sup>71</sup>
9. Given that it can be applied for a wide range of offences, it has been acknowledged that the duration of a disqualification order “should increase in tandem with the severity of the offence, whether or not it is also accompanied by a substantial fine”.<sup>72</sup>
10. The government decided against having lifetime disqualification orders because “people should be given a second chance”.<sup>73</sup> However, there is no provision for an increase in the disqualification period where offenders are recalcitrant or where longer terms of imprisonment are imposed for serious cases. Given the limited disqualification period, judges who may wish to express their disapproval of the offenders’ actions are limited to just 12 months.
11. This may be problematic for the following reasons:
  - a. First, the maximum disqualification period of 12 months means there is limited scope to differentiate severe offences from minor offences.
  - b. Second, a longer disqualification period may encourage the development of greater structure through sentencing frameworks, which may become more relevant with a wider sentencing range.
    - i. There is no discernible pattern in the length of disqualification periods ordered. The short sentencing range may hinder the courts’ ability to effectively calibrate the severity of the offence and the length of the disqualification order.
    - ii. This was noted in *Public Prosecutor v Sabrina Sim Xin Huey* (2022): “The maximum length of disqualification provided under section 43B(1)(a)(ii) of the Animals and Birds Act is 12 months. The Prosecution sought the maximum term of 12 months; Defence pleaded for the Court not to impose any term of disqualification. **The case precedents tendered (most of which were unreported), showed a general range of disqualification terms of 6 to 12 months. For the cases which were reported, there was no discernible pattern in respect of the length of the disqualification imposed, although the maximum term of disqualification appeared to be imposed in serious cases of animal abuse.**”<sup>74</sup> (our emphasis in bold)
    - iii. In *Public Prosecutor v Yeo Poh Kwee* (2017), the accused himself asked for the Court to impose a life ban, which the Court could not and refused to do: “The Prosecution further applied for a 12-month disqualification from owning any animal upon your

<sup>70</sup> *Public Prosecutor v Sabrina Sim Xin Huey* [2022] SGDC 151, at [20].

<sup>71</sup> *Sabrina Sim Xin Huey v Public Prosecutor* [2022] SGHC 240, at [18] and [20]-[23].

<sup>72</sup> *Sabrina Sim Xin Huey v Public Prosecutor* [2022] SGHC 240, at [28].

<sup>73</sup> Parliament of Singapore. (2014, November 4). *Animals and Birds (Amendment) Bill*. Second reading bills. <http://sprs.parl.gov.sg/search/#/sprs3topic?reportid=bill-125>

<sup>74</sup> *Public Prosecutor v Sabrina Sim Xin Huey* [2022] SGDC 151, at [22].

release from prison. The Accused had asked the Court to impose a life ban. Whilst that may be fitting, section 43B(1)(b) of the ABA provides that the maximum period of disqualification is 12 months. I had accordingly imposed the maximum period of 12 months' disqualification on the Accused."<sup>75</sup>

- iv. In *Public Prosecutor v Tan Guowei Edwin* (2017), the accused was given a 6-month disqualification order for an "egregious" offence under Section 41C(1)(a)(iv) involving eight dogs of whom two died. This was accompanied with the reasoning that "as the Accused was a first offender, the maximum disqualification period of 12 months' was excessive".<sup>76</sup> However, in the same year, in *Public Prosecutor v Lu Meihua* (2017), the accused was given the very same disqualification period for abandoning one dog under Section 41C(1)(b), found in otherwise healthy condition. Indeed, this disqualification period was described as "a short disqualification of six months".<sup>77</sup>
12. Sentencing frameworks are generally helpful to ensure consistency, transparency, and fairness. A standardised approach creates a more just, predictable, and effective system through which the principles of deterrence and retribution can be effectively applied.
  13. There are additional examples of cases where a longer disqualification order may have been warranted considering the severity of cruelty or the recalcitrance of the offender:
    - a. In the case of *Public Prosecutor v Yeo Wee Soon* (2020), the accused was disqualified from owning any pets for the maximum duration of 12 months. This decision followed his conviction for brutally beating his two-month-old poodle, hitting the poodle against his bathtub twice, placing the poodle in ice water, and then putting the deceased pet into a pail and dropping it into the river along Delta Avenue.<sup>78</sup>
    - b. In the case of *Kok Zhin Oi Gerald*, who admitted to four of seven charges of mistreating his ex-girlfriend's pet poodle in 2016, he was disqualified from owning animals for 12 months from the date of his release. The mistreatment involved hitting the dog approximately 10 times with a sofa cushion over a span of 15 minutes, striking the dog with a plastic clothes hanger, and violently flinging the dog three times into the corner of a bed, leading to the dog's death.<sup>79</sup>

***Recommendation 5 will provide courts with the necessary flexibility to impose penalties that match the gravity of each case.***

14. Expanding the range of disqualification periods will enable a more accurate alignment of penalties with the severity of the offence, ensuring they are proportionate and effective in preventing future harm.
15. This approach will be consistent with practices in several countries where legal systems either implement a wider range of disqualification periods, or grant courts the discretion to determine the duration of disqualification orders. Some examples include:

<sup>75</sup> *Public Prosecutor v Yeo Poh Kwee* [2017] SGMC 72, at [53].

<sup>76</sup> *Public Prosecutor v Tan Guowei, Edwin* [2017] SGMC 44, at [15].

<sup>77</sup> *Public Prosecutor v Lu Meihua* [2017] SGMC 57, at [15], [16], and [22].

<sup>78</sup> *Public Prosecutor v Yeo Wee Soon* [2020] SGDC 18.

<sup>79</sup> Chong, E. (2018, February 8). *Man gets 12 weeks' jail, banned from owning any animal after killing dog*. The Straits Times. <https://str.sg/ULkr>

- a. **United Kingdom.** Section 34(1) of the Animal Welfare Act<sup>80</sup> allows the Court to impose a disqualification order for a period deemed appropriate based on the offence's severity and the offender's circumstances.
  - b. **Germany.** Section 20(1) of the Animal Welfare Act<sup>81</sup> stipulates that the Court can impose a disqualification order ranging from one to five years. If the offender poses a risk of recidivism, the disqualification can be made permanent.
  - c. **New Zealand.** Section 169(3) of the Animal Welfare Act<sup>82</sup> permits the Court to impose a disqualification order for any period it deems fit.
  - d. **Canada (Ontario).** Provincial Animal Welfare Services Act, 2019, S.O. 2019, c. 13<sup>83</sup> provides for a lifetime disqualification from owning, having custody or care of, or living with any animals.
  - e. **Austria.** Under Section 39(1) of the Animal Welfare Act,<sup>84</sup> the Court is authorised to prohibit individuals convicted of animal cruelty from keeping animals for a certain period or permanently.
16. Expanding the range of disqualification orders to include a lifetime disqualification would also enable the legal system to more effectively address recalcitrant offenders.
  17. A comparable system is seen in the Road Traffic Act (Section 67),<sup>85</sup> which employs a graduated approach for drink-driving offences, imposing different disqualification periods for first-time and repeat offenders, with the possibility of a lifetime ban. The minimum disqualification for drink-driving is set at two years, even in the absence of injury, as a strong deterrent. In contrast, animal cruelty offences often involve actual injury, serious harm, or even death of animals.
  18. Animals are sentient beings deserving of protection. Hence, the ability to legally own a pet should be considered a privilege rather than a right.<sup>86</sup> This privilege should be revocable if an individual demonstrates an inability to responsibly care for animals.
  19. The permanent disqualification order should be reserved only for the most serious cases where individuals demonstrate an inability to reform or possess a severe disregard for animal welfare.

***Recommendation 5 improves social deterrence through extended disqualification and lifetime bans.***

<sup>80</sup> Animal Welfare Act 2006 (UK). <https://www.legislation.gov.uk/ukpga/2006/45/section/34> (Section 34).

<sup>81</sup> Tierschutzgesetz (Germany). [https://www.gesetze-im-internet.de/tierschg/\\_20.html](https://www.gesetze-im-internet.de/tierschg/_20.html) (Section 20).

<sup>82</sup> Animal Welfare Act 1999 (New Zealand). <https://www.legislation.govt.nz/act/public/1999/0142/latest/whole.html>

<sup>83</sup> Ministry of the Solicitor General, Ontario. (2024, August 9). *Animal welfare*. <https://www.ontario.ca/page/animal-welfare>

<sup>84</sup> Animal Welfare Act (Austria). <https://info.bml.gv.at/en/topics/agriculture/agriculture-in-austria/animal-production-in-austria/animal-welfare-act.html>

<sup>85</sup> Road Traffic Act 1961 (2020 Revised Edition). <https://sso.agc.gov.sg/Act/RTA1961>

<sup>86</sup> American Veterinary Medical Association. (n.d.). *Guidelines for responsible pet ownership*. Retrieved August 25, 2024, from <https://www.avma.org/resources-tools/avma-policies/guidelines-responsible-pet-ownership>

20. Classical deterrence theory<sup>87</sup> suggests that individuals evaluate the potential gains and losses before engaging in illegal activities and are deterred from offending if the perceived losses outweigh the gains. The severity of punishment is believed to play an important role in fostering law-abiding behaviour.
21. In the case of *Public Prosecutor v Sabrina Sim Xin Huey* (2022), the Court noted that “a disqualification order does not merely serve the ends of specific deterrence” but it combines three sentencing objectives — punishment, protection of the public, and deterrence (at [26]).<sup>88</sup>
22. A longer disqualification period would support these sentencing objectives by:
  - a. Strengthening punishment with a more substantial loss of privileges based on the offence committed
  - b. Protecting public interest, including animals and their owners, by preventing pet businesses that have demonstrated an inability to responsibly care for animals from operating and providing services for a duration deemed appropriate by the court
  - c. Improving deterrence by adopting a more stringent stance that both dissuades the individual from reoffending and serves as a stern warning to others about the consequences of committing similar offences

***Longer disqualification periods ensure that adequate time is allocated for meaningful reflection, rehabilitation, treatment, and reskilling.***

23. Animal cruelty is frequently associated with behavioural and psychiatric disorders, reflecting a complex interplay of psychological motivations, individual risk factors, and social settings.<sup>89</sup> For instance, the Diagnostic and Statistical Manual of Mental Disorders (DSM-V)<sup>90</sup> includes animal abuse as a diagnostic criterion for conduct disorder.
24. Therefore, extending the duration of disqualification orders is important to allow sufficient time for first-time offenders to undergo necessary rehabilitation and treatment before allowing them to safely own pets again. This extended period ensures that individuals are better prepared to responsibly care for pets, thereby increasing the chances of preventing future incidents of animal cruelty.
25. The duration of treatment for psychiatric disorders can vary widely based on factors such as the severity of the disorder, the individual's response to therapy, and any co-occurring conditions. Consequently, the length of a disqualification order may also differ significantly from person to person.

<sup>87</sup> Abramovaite, J., Bandyopadhyay, S., Bhattacharya, S., & Cowen, N. (2022). Classical deterrence theory revisited: An empirical analysis of Police Force Areas in England and Wales. *European Journal of Criminology*, 20(5), 1663–1680. <https://doi.org/10.1177/14773708211072415>

<sup>88</sup> *Public Prosecutor v Sabrina Sim Xin Huey* [2022] SGDC 151.

<sup>89</sup> Longobardi, C. & Badenes-Ribera, L. (2019). The relationship between animal cruelty in children and adolescent and interpersonal violence: A systematic review. *Aggression and Violent Behavior*, 46, 201–211. <https://doi.org/10.1016/j.avb.2018.09.001>

<sup>90</sup> American Psychiatric Association. (n.d.). *Diagnostic and Statistical Manual of Mental Disorders (DSM-5-TR)*. <https://www.psychiatry.org/psychiatrists/practice/dsm>



26. By expanding the disqualification period range, the Court can more flexibly and effectively determine the length of disqualification based on each individual's circumstances and progress in rehabilitation. This provides individuals sufficient time to address any underlying issues and ensures that they are in a better position to responsibly care for animals, ultimately promoting better outcomes for both the individuals involved and the welfare of the pets they seek to own.
  - a. For example, a longer disqualification period would provide individuals with alcohol-use disorder a longer remission phase, thereby reducing the risk of relapse and enhancing their ability to responsibly care for animals under their supervision.
  - b. For individuals with chronic psychiatric disorders who exhibit resistance to treatment or rehabilitation, or who lack the capacity for empathy or remorse, lengthening the disqualification period might not be sufficient. Given the high rates of recidivism and limited treatment options, a lifetime ban is deemed necessary to protect animals from future harm.
  - c. In cases where psychiatric disorders are associated with an individual's interest in animals (e.g. hoarding or compulsions to keep pets), a longer or permanent ban on pet ownership may function as a critical safeguard. It provides a long-term solution to prevent the individual from re-engaging in behaviours that could harm animals. It also ensures that the individual is protected from the stress and potential dangers associated with pet ownership.
27. An extended disqualification order also allows adequate time to implement measures such as additional training and improvements among individuals carrying out animal-related businesses. This ensures that businesses have the opportunity to address deficiencies and strengthen their operational capacity, leading to better adherence to animal welfare standards.
28. For example, following the tragic incident where a Maltese died from hanging when groomer Boon Regine Vienna left the dog unattended,<sup>91</sup> Boon expressed her intentions to enrol in a grooming course. The Judge remarked, "I hope that the accused will take this time to... upskill and upgrade herself such that she will return to this pet industry confidently."

***Recommendation 5 will ensure animal-related businesses uphold high standards and remain accountable.***

29. Animal-related businesses, such as groomers, breeders, and pet stores, have a greater impact on animal welfare due to their larger-scale operations. Non-compliance with standards set by the Code of Animal Welfare can affect the quality of care and safety of multiple animals, rather than just a single pet. For instance, the owner of Prestige Grooming Academy, Low Chong Kiat, was found to have abandoned 18 dogs over two days in 2016.<sup>92</sup>
30. Pet businesses also play a key role in public perception of animal welfare as pet owners "look to people working in the pet industry to provide expert advice on pet care".<sup>93</sup> Ensuring that these businesses adhere to regulations will improve public trust and confidence in the integrity of the

<sup>91</sup> Low, Y. (2023, May 3). *Dog groomer fined after maltese died from hanging off its own leash as she took smoke break*. TODAY. <https://www.todayonline.com/singapore/fine-dog-groomer-smoking-break-maltese-hanged-leash-2163851>

<sup>92</sup> Hussain, A. (2016, September 23). *Pet grooming school owner gets 6 weeks' jail for abandoning 18 dogs*. The Straits Times. <https://str.sg/3zLk>

<sup>93</sup> Animal & Veterinary Service (formerly Agri-Food & Veterinary Authority of Singapore). (2016). *Code of Animal Welfare (for the pet industry)*. [https://www.nparks.gov.sg/avs/-/media/avs\\_-caw-pet-industry-full-\(eng\).pdf](https://www.nparks.gov.sg/avs/-/media/avs_-caw-pet-industry-full-(eng).pdf)

industry, while having a positive spillover to how people view animal treatment and care. Hence, these businesses have a duty to uphold higher standards of animal care.

31. Implementing a more substantial penalty for these businesses may enhance compliance as it would have a greater impact on the livelihoods of individuals involved by affecting their ability to operate and generate income. This provides a clear and strict warning to other businesses about the serious consequences of committing similar offences.
32. Although Boon Regine Vienna was disqualified from operating any animal-related business for nine months, this disqualification order did not sufficiently deter similar incidents, as evidenced by an incident that occurred in 2024 when a corgi, left leashed on a grooming table while three staff members took a break for over 30 minutes, fell off the table and died under nearly identical circumstances.<sup>94</sup> Between December 2023 and July 2024, the SPCA recorded 5 cases of groomers not adhering to professional standards,<sup>95</sup> ultimately causing harm to animals under their care. A longer disqualification period, coupled with other preventive measures to improve the industry, may enhance the likelihood of pet businesses' adherence to the Animals and Birds Act.
33. In 2022, dog trainer Sabrina Sim, who had been fined \$8,000 and disqualified from carrying out any animal-related business for eight months, unsuccessfully appealed against her disqualification,<sup>96</sup> likely wanting to return to the industry sooner. Longer disqualification periods would compel individuals who may view the profession as a long-term career to carefully consider their actions and take the necessary precautions to prevent mishaps in the first place.

### **Conclusion on Recommendation 5**

34. Recommendation 5 would provide more consistency in how disqualification orders are issued.
35. Recommendation 5 will provide courts greater discretion to ensure penalties reflect the gravity of each case. This ensures that both minor and severe offences are appropriately addressed, offering a proportionate response that aligns with the circumstances of each situation.
36. Extending disqualification periods and introducing lifetime bans for severe or repeated offences will strengthen deterrence, ensuring pet owners and animal-related businesses alike adhere to higher standards.
37. Longer disqualification periods allow sufficient time for offenders to undergo meaningful rehabilitation and treatment, particularly in cases involving underlying behavioural or psychiatric disorders. This will improve the likelihood of successful reintegration into the animal care industry and reduce the risk of future incidents of cruelty, promoting better outcomes for both offenders and animals.

<sup>94</sup> Martens, H. (2024, July 25). *Pet corgi dies after groomers in S'pore shop left it alone, CCTV shows it hanging by the neck*. Mothership. <https://mothership.sg/2024/07/corgi-dies-left-unattended/>

<sup>95</sup> SPCA Singapore. (2024). *Case files*. Unpublished internal document.

<sup>96</sup> Lim, J. (2022, September 27). *Trainer loses appeal against disqualification order after death of 2 dogs in car boot*. The Straits Times. <https://str.sg/wmr>

**Recommendation 6:**

**Impose obligations on online service providers to prohibit the sale (or offering for sale) of companion animals, wildlife, and scheduled species without a licence**

1. The Committee recommends imposing obligations on online service providers to prohibit the sale (or offering for sale) of live animals via online material without a licence.
2. This involves:
  - a. Inserting a new section in Part 4 of the Animals and Birds Act 1965 (“**ABA**”) to make it an offence to sell, offer, expose, advertise for sale, or display to the public any animal who is not intended for consumption in the course of an animal-related business without a valid licence under Section 48 of the Act, and
  - b. Including an exemption which specifies that in this section, “animal-related business” excludes the operation of any animal rescue, welfare organisation, or facility (“**New ABA Section**”)
  - c. Amending the First Schedule of the Online Criminal Harms Act 2023 to include the New ABA Section, Section 8 of the Wildlife Act, and Section 4 of the Endangered Species (Import and Export) Act 2006
  - d. Amending the Second Schedule of the Online Criminal Harms Act 2023 to include the New ABA Section, Section 8 of the Wildlife Act, and Section 4 of the Endangered Species (Import and Export) Act 2006

**Introduction to Recommendation 6**

**Rise in illegal sales through online platforms**

3. Singapore is a major hub for illegal wildlife trade.<sup>97</sup> Over the years, through the combined efforts of animal welfare groups and the authorities, the sale of prohibited wildlife and their parts in physical stores has declined drastically. However, with the global pandemic and the ubiquity of e-commerce, the illegal wildlife trade has shifted to the online space, and the law has not caught up with this trend.
4. ACRES has been monitoring the online illegal wildlife trade since 2010. ACRES, together with the enforcement personnel from the then Agri-Food and Veterinary Authority (AVA), conducted a sting operation which resulted in the seizure of tiger skin pelts and live animals such as hedgehogs and Indian star tortoises.<sup>98</sup> These were advertised for sale online.
5. In 2016, ACRES conducted an undercover investigation into the online illegal pet trade and found 156 advertisements touting exotic animals as pets.<sup>99</sup> The six-month investigation involved monitoring six online platforms: Gumtree, Locanto Classifieds Singapore, ST701, Carousell,

<sup>97</sup> TRAFFIC. (2020, February 19). *Southeast Asia: At the heart of wildlife trade*. <https://www.traffic.org/publications/reports/renewed-game-plan-needed-to-tackle-southeast-asias-massive-wildlife-trafficking-problem/>

<sup>98</sup> Wild Singapore. (2010, September 30). *ACRES sting operation: Seizure of alleged tiger skins*. ACRES press release. <https://wildsingaporenews.blogspot.com/2010/09/acres-sting-operation-seizure-of.html>

<sup>99</sup> The Straits Times. (2015, December 21). *ACRES finds 156 online advertisements touting illegal pets*. <https://acres.org.sg/wp-content/uploads/2017/05/Acres-finds-156-online-advertisements-touting-illegal-pets-21st-Dec-2015.pdf>

Adpost, and ChaosAds. ACRES contacted 17 sellers who each had multiple advertisements, of whom 14 responded. The investigation culminated in joint sting operations with AVA, where animals such as sugar gliders and an Asian Leopard Cat were seized.

6. After the domestic trade ban on elephant ivory was implemented in September 2021, a 76% drop in total listings was observed as per a study conducted by NParks.<sup>100</sup> However, 1,010 unique elephant ivory and lookalike listings were found online after the implementation of the domestic trade ban.<sup>101</sup>
7. In 2021, a report by TRAFFIC, a non-governmental organisation (NGO), found that 3,354 live birds were offered for sale in 44 Singapore-based Facebook groups from December 2018 to April 2019.<sup>102</sup> NParks and Facebook collaborated to close groups and remove posts involved in illegal wildlife trade, with NParks also issuing advisory letters to sellers. However, the researchers conducted another survey in April 2021, which found that 36 out of 44 groups initially surveyed were still active and had grown in membership. They continued making daily sales posts, except using disguised wording. While 13 groups had been shut down, five were re-formed under similar names, highlighting the persistent efforts of traders and buyers to bypass regulations and the ongoing role of online platforms in Singapore's live bird trade.
8. The situation is no different with the illegal sale of companion animals. These animals are either smuggled into Singapore from other countries or bred locally by unlicensed breeders. In December 2024, NParks prosecuted a purchaser for abetting animal smuggling. The smuggled dog and other animals were bred in Malaysia, advertised for sale on a Telegram group chat, and smuggled into Singapore.<sup>103</sup> In 2022, NParks removed 19 dogs from a couple who were breeding them illegally at home. NParks advised prospective pet owners not to purchase pets from unknown sources, including online platforms.

### Gaps in the law

9. Existing laws prohibit the advertising for sale of wildlife or wildlife parts and scheduled species, and the keeping of animals in captivity for sale. Section 8(1) of the Wildlife Act 1965 states that a person “must not offer for sale, sell or export any wildlife (whether alive or dead), or any part of a wildlife” without approval from the Director-General. Section 4(1) of the Endangered Species (Import and Export) Act 2006 makes it an offence if anyone “sells, or offers, exposes or advertises for sale, or displays to the public, any scheduled species” without a valid permit. The Animals and Birds Act 1965 does not have a section that expressly prohibits the advertising of companion animals for sale without a licence, but Section 48 of the Act prohibits persons from keeping animals in captivity for sale in any place which has not been licensed, and this section has been used to prosecute unlicensed breeders.
10. These laws only hold accountable the **individuals** involved in the advertising, buying, or selling of these animals. They do not hold **online service providers** responsible for publishing these illicit

<sup>100</sup> Yeo, H. H. T., Ng, S. J. W., Lee, J. S. R., Soh, M. C. K., Wong, A. M. S., Loo, A. H. B., & Er, K. B. H. (2023). A systematic survey of the online trade in elephant ivory in Singapore before and after a domestic trade ban. *Oryx*, 58(1), 48–55. <https://doi.org/10.1017/S0030605323000728>

<sup>101</sup> Ibid., [p. 51].

<sup>102</sup> Chiok, W. X. & Chng, S. (2021, December). *Trading faces: Live bird trade on Facebook in Singapore*. TRAFFIC. <https://www.traffic.org/publications/reports/trading-faces-live-bird-trade-on-facebook-in-singapore/>

<sup>103</sup> Alkhatib, S. (2024, December 5). *Dog buyer fined \$7k, first time NParks has prosecuted purchaser over animal smuggling*. The Straits Times. <https://str.sg/rPQS>

advertisements or impose any obligations on the online service providers to monitor and remove such content.

11. Further, without any legislation to serve as a minimum standard for online service providers, each platform has developed their own policies as a form of self-regulation. This has resulted in a variance of standards in platform policies and enforcement efforts across different platforms.
12. For example, many platforms — such as WhatsApp, Facebook, Instagram, TikTok, Lazada, Shopee, AliExpress, Taobao, Amazon, and Carousell — have policies prohibiting open sale of live animals, but their enforcement efforts are inadequate. This can be seen from the numerous advertisements of live animals for sale on their platforms. A study on China's Taobao platform showed that over 70,000 live parrots and turtles (totalling 46 and 49 protected species, respectively) were sold over 150 days on the platform.<sup>104</sup> Only one platform, Lazada, required sellers to upload their pet shop licence details during registration.<sup>105</sup> Even if users flag advertisements in which live and prohibited animals are offered for sale to the platform, these advertisements are often only removed several days after reporting, by which time transactions may have been concluded.

### Consequences

13. If left unchecked, the illegal wildlife trade may lead to the extinction of species that are already recognised as endangered under the International Union for Conservation of Nature (IUCN) Red List of Threatened Species. It can also lead to the spread of zoonotic diseases such as rabies and salmonellosis from animals to humans, compromised animal welfare arising from unsuitable living conditions, poor diet, and pet owners' lack of knowledge of the proper care for the animal, animals dying during the risky smuggling process, and abandonment.<sup>106</sup>
14. Likewise, NParks has warned that the smuggling and illegal trade of pets pose a threat to public health and compromise animal welfare.<sup>107</sup>

***Recommendation 6 will bridge the current gaps across all animal-related legislation in Singapore.***

15. The proposed amendments to the Animals and Birds Act are to:
  - a. Insert a new section in Part 4 of the Animals and Birds Act 1965 ("**ABA**") to make it an offence to sell, offer, expose, advertise for sale, or display to the public any animal who is not intended for consumption in the course of an animal-related business without a valid licence under Section 48 of the Act, and
  - b. Include an exception which specifies that in this section, "animal-related business" excludes the operation of any animal rescue, welfare organisation, or facility ("**New ABA Section**")

<sup>104</sup> Ye, Y-C., Yu, W-H., Newman, C., Buesching, C. D., Xu-Y-L., Xiao, X., Macdonald, D. W., & Zhou, Z-M. (2020). Effects of regional economics on the online sale of protected parrots and turtles in China. *Conservation Science and Practice*, 2(3), 1–9. <https://doi.org/10.1111/csp2.161>

<sup>105</sup> Lazada Seller Help Centre. (n.d.). Policy updates, agreement and guidelines: Product registration / license / certificate. [https://sellercenter.lazada.sg/helpcenter/s/fag/knowledge?categoryId=1000028220&m\\_station=BuyerHelp&questionId=1000145716](https://sellercenter.lazada.sg/helpcenter/s/fag/knowledge?categoryId=1000028220&m_station=BuyerHelp&questionId=1000145716)

<sup>106</sup> ACRES. (November 2023). Online illegal wildlife trade on Telegram in Singapore. <https://acres.org.sg/wp-content/uploads/2023/12/Telegram-Report-2023-FOR-PRINT.pdf> (page 9)

<sup>107</sup> Alkhatib, S. (2024, December 5). Dog buyer fined \$7k, first time NParks has prosecuted purchaser over animal smuggling. The Straits Times. <https://str.sg/rPQS>



16. As mentioned above, unlike the Wildlife Act and the Endangered Species Act, the Animals and Birds Act does not have a section that expressly prohibits the advertising of companion animals for sale without a licence. The insertion of the New ABA Section fills this gap and aligns the Animals and Birds Act with the Wildlife Act and the Endangered Species Act.
17. The carveouts prevent the proposed amendments from adversely affecting food businesses and animal welfare groups. Animal welfare groups, in particular, need to be exempted because they facilitate the fostering and adoption of companion animals.

***Recommendation 6 will bring alignment in the legal approach towards illegal trade in animals.***

18. The recommendation proposes the inclusion of the following to the Online Criminal Harms Act 2023 (“OCHA”) First and Second Schedules’ List of Specified Offences:
  - a. The proposed New ABA Section,
  - b. Section 8 of the Wildlife Act, and
  - c. Section 4 of the Endangered Species (Import and Export) Act 2006
19. The First Schedule of the OCHA defines the specific offences covered under the Act in two parts. Part 1 Specified Offences include offences under the Singapore’s Penal Code and other legislation that involve harms committed online, such as fraud, harassment, or abuse.
20. The amendments to the First Schedule of the OCHA will allow the authorities to issue directions to online service providers and other entities or individuals to limit the reach of these online activities, while the amendments to the Second Schedule of the OCHA will impose obligations on online communication service providers and e-commerce service providers to implement appropriate systems, processes, or measures to detect and take action against these specified offences.
21. In August 2024, the Organised Crimes Act (“OCA”) listed the Endangered Species (Import and Export) Act under its schedule,<sup>108</sup> emphasising its importance in combating wildlife-related offences.
22. The illegal wildlife trade is known to be closely linked to organised crime syndicates, which often engage in other illicit activities such as drug trafficking, money laundering, and smuggling.<sup>109</sup> These syndicates exploit similar routes and mechanisms to transport illegal goods, including wildlife and companion animals, creating a nexus between animal trafficking and broader criminal enterprises. The recent amendment to the OCA rightfully recognised the need to focus on empowering Singapore’s enforcement agencies to dismantle financial networks and disrupt the economic incentives. This is key to enabling the enforcement agencies to deliver a stronger deterrent against organised criminal engagements.
23. Therefore, to effectively address serious offences both physically and on online platforms, it is essential to include the illegal sale of live animals in the OCHA’s Schedule’s List of Specified Offences. By omitting the illegal online sale of animals from the OCHA, enforcement agencies face a fragmented approach to tackling these interconnected crimes.

<sup>108</sup> Chua, N. (2024, August 29). *Wildlife trade offences considered serious offences under Organised Crime Act from Aug 30: MHA*. The Straits Times. <https://str.sg/vhcd>

<sup>109</sup> UNODC Regional Office for Southeast Asia and the Pacific. (n.d.). *Wildlife and forest crime: Overview*. <https://www.unodc.org/roseap/en/what-we-do/toc/wildlife-overview.html>

24. In conclusion, this recommendation will allow for consistent treatment of animal-related crimes across legislation and enhance the effectiveness of enforcement by obligating online platforms to detect, report, and mitigate such illegal sales of live animals online.

***Recommendation 6 will empower enforcement agencies to tackle the challenging and rampant online animal trade in Singapore.***

25. Under the OCHA Part 2, online platforms are required to take several actions and implement measures to mitigate criminal activities, including:
- a. Establishing systems and processes to detect criminal activities, such as illegal content or fraudulent transactions, as specified under the Act
  - b. Providing mechanisms for users to report illegal content. Upon notification, platforms must investigate and remove such content promptly.
  - c. Adopting proactive measures, such as random checks, to prevent the recurrence of criminal activities and ensure compliance with the law
  - d. Cooperating with government directives, providing information, records, or technical assistance to facilitate investigations and enforcement actions
  - e. Implementing accountability measures, including maintaining transaction records and ensuring traceability of users involved in specified offences
26. Monitoring, investigations, and enforcement of online crimes against animals has been a resource-intensive and challenging endeavour due to the nature of transactions, the scale of trade, encryption, and constantly evolving keywords.<sup>110</sup> Hence, robust regulatory framework with clear guidelines for online platforms and e-commerce services will empower enforcement agencies in key ways:
- a. Mandating online platforms to detect, remove, and report unlicensed animal sales reduces the burden on enforcement agencies by providing pre-verified leads for investigation
  - b. A regulatory framework provides legal clarity and standardisation for the online platforms on measures to be put in place for proactive detection and action
  - c. A regulatory framework provides clarity for enforcement agencies to take decisive action against offenders and platforms that fail to comply with these obligations
  - d. The guidelines can potentially foster partnerships among online platforms, enforcement agencies, and animal welfare groups, creating a united front against the online live animal trade

***Recommendation 6 will acknowledge the harms caused by the illegal animal trade.***

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<sup>110</sup> Mohamed Yusof, Z. (2023, August 7). *Illegal wildlife trade 'thriving' in virtual world; NParks monitoring marketplaces*. The Straits Times. <https://str.sg/i5Jk>

27. **Parliamentary Discourse on OCHA Schedule and illegal trade in animals.** During the second reading of the Online Criminal Harms Bill,<sup>111</sup> former Member of Parliament Mr Louis Ng asked if the government would consider including offences under the Animals and Birds Act, Wildlife Act, and the Endangered Species (Import and Export) Act in the Second Schedule of the OCHA. The government's reply was that the Bill focuses on criminal offences pertaining to national security, national harmony, and individual safety, but they are open to considering his suggestion in future reviews of the OCHA.
28. Illegal trade in live animals has been highlighted as a threat to public safety and national security through many international reports and studies:
- The February 2017 Executive Order on Transnational Criminal Organizations (TOC)<sup>112</sup> aims to strengthen federal enforcement by targeting illegal activities that pose threats to public safety and national security. The list of such activities includes illegal wildlife trade alongside human-, weapon-, and drug-trafficking, financial crimes, cybercrimes, and corruption.
  - The World Wildlife Crime Report (2020)<sup>113</sup> highlights that illegal trafficking in wild animal species can increase the transmission of diseases from animals to humans. It clearly states that, "Trafficked wild species — pangolins, birds, turtles, tigers, bears and many more — and the resulting products offered for human consumption, by definition, escape any hygiene or sanitary control, and therefore pose even greater risks of infection."
  - Recognising the threats presented by illegal trade in animals, the UNODC aims to end trafficking of protected species as part of the UN sustainable development goals.<sup>114</sup>
  - The 2022 ASEAN Strategy<sup>115</sup> for preventing zoonotic diseases from wildlife trade strongly recommended harmonising wildlife trade related laws and conducting reviews as a focus area to tackle wildlife trade and prevent zoonoses spread in the ASEAN region.
  - The Kunming-Montreal Global Biodiversity Framework and the World Health Organisation Pandemic Agreement<sup>116</sup> emphasise zoonotic spillover prevention from trade in animals, underscoring the interconnected health of people, animals, and ecosystems.
  - The illegal online sale of live animals often involves animals with unknown origins, health conditions, or exposure to pathogens. These animals may serve as vectors for zoonotic diseases, posing significant risks to public health.<sup>117</sup> By requiring online platforms to implement

<sup>111</sup> Parliament of Singapore. (2023, July 5). *Online Criminal Harms Bill*. Second reading bills. <https://sprs.parl.gov.sg/search/#/sprs3topic?reportid=bill-647>

<sup>112</sup> The World Bank. (2019, October). *Illegal logging, fishing, and wildlife trade: The costs and how to combat it*. <https://thedocs.worldbank.org/en/doc/482771571323560234-0120022019/original/WBGRReport1017Digital.pdf>

<sup>113</sup> UNODC. (2020). *World wildlife crime report: Trafficking in protected species*. [https://www.unodc.org/documents/data-and-analysis/wildlife/2020/World\\_Wildlife\\_Report\\_2020\\_9July.pdf](https://www.unodc.org/documents/data-and-analysis/wildlife/2020/World_Wildlife_Report_2020_9July.pdf)

<sup>114</sup> Weston, P. (2024, May 13). *Global wildlife crime causing 'untold harm', UN report finds*. The Guardian. <https://www.theguardian.com/environment/article/2024/may/13/global-wildlife-crime-untold-harm-un-report-unodc-aoe>

<sup>115</sup> ASEAN Senior Officials on Forestry. (2022). *ASEAN strategy for preventing transmission of zoonotic diseases from wildlife trade*. <https://asean.org/wp-content/uploads/2023/01/15-ASEAN-Strategy-for-Preventing-Zoonotic-Diseases-Transmission-from-Wildlife-Adopted.pdf> (page 16)

<sup>116</sup> World Health Organization. (2024, March 13). *Revised draft of the negotiating text of the WHO pandemic agreement*. [https://apps.who.int/gb/inb/pdf\\_files/inb9/A\\_inb9\\_3-en.pdf](https://apps.who.int/gb/inb/pdf_files/inb9/A_inb9_3-en.pdf)

<sup>117</sup> Wildlife Conservation Society. (n.d.). *Wildlife trade*. <https://oneworlddonehealth.wcs.org/Initiatives/Wildlife-Trafficking.aspx>

systems to detect and act against unlicensed sales, the proposed amendments help mitigate the following risks:

- i. The inadvertent movement of pathogens due to the wildlife trade is not limited to human pathogens but also affects pathogens of domestic animals and native wildlife.
- ii. Illegally sourced animals come from suboptimal or horrendous welfare conditions where animals of multiple species are housed in crowded conditions, resulting in stress. This amplifies the risk factors for emergence of new pathogens,<sup>118</sup> shedding, and transmission to different species including humans and companion animals.
- iii. The illegal trade in companion animals, such as cats and dogs, is treated as a lucrative transnational organised crime in the EU, evading taxes and ethical breeding standards. It has been recognised to pose significant risks to human and animal health,<sup>119</sup> prompting stronger EU-wide and national legislation to tackle unregulated commercial trade in companion animals.<sup>120</sup>

***Recommendation 6 will support the delivery of Singapore's commitments to CITES.***

29. As a party to CITES, Singapore has proven its commitment through heightened enforcement efforts — establishing a centre for wildlife forensics as Asia's first CITES-recognised laboratory<sup>121</sup> and launching the app Fin Finder<sup>122</sup> to aid enforcement — and has been awarded the CITES certificate of commendation for exemplary enforcement action in 2017.<sup>123</sup>
30. CITES Conf. Resolution 11.3 on compliance and enforcement,<sup>124</sup> regarding wildlife crime on the Internet (VII, 16), recommends that parties to the CITES:
  - a. Engage the online platforms to introduce and publish policies to address and prevent the use of such platforms for illegal trade in wildlife, including measures to ensure compliance with such policies,
  - b. Ensure that such policies are presented clearly and visibly, and
  - c. Encourage them to inform their users about wildlife crime linked to the Internet, by using targeted alerts and other technology to make users aware of relevant laws and website policies

<sup>118</sup> Keats, L. & Wildlife Conservation Society. (2022, November 7). *A One Health approach to wildlife trade and policy in Vietnam*. Panorama. <https://panorama.solutions/en/solution/one-health-approach-wildlife-trade-and-policy-viet-nam>

<sup>119</sup> Ingram, D. J., Morcatty, T. Q., El Bizri, H. R., Poudyal, M., & Mundy, E. (2024). Urgent actions needed by digital services platforms to help achieve conservation and public health goals. *Conservation Letters*, 17(4), 1–4. <https://doi.org/10.1111/conl.13023>

<sup>120</sup> European Commission. (2018, August 16). *Commission recommendation of 16.8.2018 on a coordinated control plan for the official controls on online sales of dogs and cats*. [https://food.ec.europa.eu/system/files/2019-09/aw\\_other\\_euccp\\_recommend\\_2018-5488-f1\\_987143.pdf](https://food.ec.europa.eu/system/files/2019-09/aw_other_euccp_recommend_2018-5488-f1_987143.pdf)

<sup>121</sup> Acuerdo de Cooperación Ambiental Chile-Canadá. (2023). *Singapore's enforcement efforts against illegal wildlife trade*. <https://acuerochilecanada.mma.gob.cl/wp-content/uploads/2023/05/1.4-Xie-Renhui-Singapore.pdf>

<sup>122</sup> National Parks Board. (2022, July 8). *Singapore develops Asia's first AI-based mobile app for shark and ray fin identification to combat illegal wildlife trade*. <https://www.nparks.gov.sg/news/news-detail/singapore-develops-asia's-first-ai-based-mobile-app-for-shark-and-ray-fin-identification-to-combat-illegal-wildlife-trade>

<sup>123</sup> Ministry of Foreign Affairs, Singapore. (2017, July 27). *AVA awarded CITES certificate of commendation for exemplary enforcement action, 27 July 2017*. [https://www.mfa.gov.sg/Overseas-Mission/Geneva-WTO/Mission-Updates/2017/07/press\\_20170727](https://www.mfa.gov.sg/Overseas-Mission/Geneva-WTO/Mission-Updates/2017/07/press_20170727)

<sup>124</sup> Resolution Conf. 11.3 (Rev. CoP19). <https://cites.org/sites/default/files/documents/COP/19/resolution/E-Res-11-03-R19.pdf>

- d. Most importantly, the resolution recommends that Parties establish, at the national level, a unit dedicated to investigating and monitoring such cybercrimes.
31. Hence, this recommendation will support having a legislative framework and policy to reinforce NParks' efforts in tackling the illegal live animal and prohibited wildlife parts trade online in Singapore, further fulfilling our commitments to CITES as a party.

***The online trade in live animals is regulated to certain degrees in some countries, setting a precedent that Singapore can take reference from.***

32. In other jurisdictions, the European Union has included the illegal sale of live animals in the definition of “illegal content”<sup>125</sup> and placed obligations on online platforms to “make reasonable efforts to randomly check whether the products or services offered have been identified as being illegal”,<sup>126</sup> include “notice and action” mechanisms for users to report illegal content,<sup>127</sup> and take action when notified of such illegal content.<sup>128</sup>
33. Brazil’s environmental regulatory agency fined META USD 2 million for failing to remove thousands of flagged posts advertising illegal wildlife sales.<sup>129</sup> This case highlights the critical need to hold platforms accountable for user-generated content that facilitates environmentally destructive activities, such as wildlife trafficking, emphasising that platform immunity should not shield them from accountability.
34. In India, the definition of a “pet shop” under the Prevention of Cruelty to Animals Act (Pet Shop Rules)<sup>130</sup> includes online platforms in addition to physical premises, hence applying the licensing requirements as well.

### **Conclusion on Recommendation 6**

35. The prevalence of online advertisements for the sale of companion animals, wildlife, and scheduled species in Singapore shows that more needs to be done to disrupt the illegal sale of these animals via online material. Recent analyses<sup>131</sup> have concluded that it is not feasible in the long term to rely solely on citizen action programmes (such as the Cyber Spotter Program<sup>132</sup>) and that detection and removals of illegal advertisements by tech companies have had limited success,<sup>133</sup> emphasising the need for regulation of the online platforms. ACRES’s 2023 report on the rampant sale of

<sup>125</sup> Digital Services Act. [https://www.eu-digital-services-act.com/Digital\\_Services\\_Act\\_Preamble\\_11\\_to\\_20.html](https://www.eu-digital-services-act.com/Digital_Services_Act_Preamble_11_to_20.html) (preamble 12)

<sup>126</sup> Digital Services Act. [https://www.eu-digital-services-act.com/Digital\\_Services\\_Act\\_Preamble\\_71\\_to\\_80.html](https://www.eu-digital-services-act.com/Digital_Services_Act_Preamble_71_to_80.html) (preamble 74)

<sup>127</sup> Digital Services Act, Article 16. [https://www.eu-digital-services-act.com/Digital\\_Services\\_Act\\_Article\\_16.html](https://www.eu-digital-services-act.com/Digital_Services_Act_Article_16.html)

<sup>128</sup> Digital Services Act, Article 23. [https://www.eu-digital-services-act.com/Digital\\_Services\\_Act\\_Article\\_23.html](https://www.eu-digital-services-act.com/Digital_Services_Act_Article_23.html)

<sup>129</sup> Morcatty, T. Q., Peters, G., Nekaris, K. A. I., Cardoso, P., Fukushima, C. S., El Bizri, H. R., & Nijman, V. (2022). Tech companies liable for illegal wildlife trade. *Science*, 377(6607), 721. <https://doi.org/10.1126/science.ade0843>

<sup>130</sup> Prevention of Cruelty to Animals (Pet Shop) Rules, 2018.

<https://awbi.gov.in/uploads/regulations/163310021561Pet%20Shop%20Rules%202018%20-%2027%206%202019%20English.pdf>

<sup>131</sup> Ingram, D. J., Morcatty, T. Q., El Bizri, H. R., Poudyal, M., & Mundy, E. (2024). Urgent actions needed by digital services platforms to help achieve conservation and public health goals. *Conservation Letters*, 17(4), 1–4. <https://doi.org/10.1111/conl.13023>

<sup>132</sup> TRAFFIC, World Wildlife Fund, & International Fund for Animal Welfare. (2020). *Offline and in the wild: A progress report of the coalition to end wildlife trafficking online*. <https://www.ifaw.org/international/resources/offline-and-in-the-wild-report>

<sup>133</sup> Venturini, S. & Roberts, D. L. (2020). Disguising elephant ivory as other materials in the online trade. *Tropical Conservation Science*, 13, 1–8. <https://doi.org/10.1177/1940082920974604>

prohibited wildlife and companion animals on Telegram in Singapore,<sup>134</sup> and its 2022 report on the online sales of birds,<sup>135</sup> have highlighted the rising trends despite enforcement efforts by NParks.

36. This Committee urges the government to implement the proposed legislative amendments or mechanisms similar to the approach taken by the European Union to combat the illegal online trade of companion animals, wildlife, and scheduled species in Singapore.

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<sup>134</sup> ACRES. (November 2023). *Online illegal wildlife trade on Telegram in Singapore*. <https://acres.org.sg/wp-content/uploads/2023/12/Telegram-Report-2023-FOR-PRINT.pdf>

<sup>135</sup> ACRES. (2021, December). *Report: Survey into pet shop welfare conditions for birds in Singapore and recommendations*. <https://acres.org.sg/wp-content/uploads/2022/02/2022-Bird-report.pdf>



## Recommendation 7:

### Strengthen powers of animal welfare groups to perform rescue functions

1. The Committee proposes supporting animal welfare organisations in their efforts to perform rescue operations more effectively, by granting them powers to assist the authorities.

#### Introduction to Recommendation 7

2. The Animal & Veterinary Service (AVS), a division of NParks, is the main government agency responsible for enforcing animal protection laws. Under Section 3 of the Animals and Birds Act, the Director-General of the AVS has the authority to appoint authorised officers to administer and carry out the provisions of the Act.<sup>136</sup>
3. The Industry Standards and Regulatory division of the AVS cluster is responsible for ensuring compliance with minimum standards and licensing conditions, investigating animal cruelty and neglect cases, and escalating these cases for prosecution. Between 2019 and 2023, AVS received approximately 1,250 cases of alleged animal cruelty. On average, 60 cases resulted in enforcement action annually.<sup>137</sup>
4. With a rise in pet ownership,<sup>138</sup> the number of cases of poor animal welfare and cruelty have correspondingly increased. In 2023, the SPCA reported a 79% spike in animal cruelty and welfare cases, marking the highest figure in 11 years.<sup>139</sup>
5. The recent announcement permitting cats to be kept in HDB flats<sup>140</sup> is expected to lead to an increase in this number.<sup>141</sup> This is likely to impact the AVS's operations and may strain their ability to allocate resources towards addressing every reported case.
6. Animal welfare groups (AWGs) currently have a long-standing proven track record of assisting the authorities and safeguarding the health and welfare of animals. Codifying assistive powers granted to established AWGs, such as the SPCA and ACRES, can ensure an expedited response to incidents, e.g. providing immediate assistance and nourishment to an animal in an emergency situation and increasing the efficiency with which cases that threaten the welfare of animals are responded to. Established AWGs are familiar with the situation on the ground, possess the necessary expertise and certifications, and can prove an invaluable resource in assisting the authorities. Calling upon AWGs will streamline workflow, increase efficiency, and send a strong message to the public that the AVS takes animal welfare and health seriously.
7. The concept of conferring assistive powers on an animal welfare organisation has precedent. On 27 March 1876, the Society for the Prevention of Cruelty to Animals (SPCA) was established in

<sup>136</sup> Animals and Birds Act 1965 (2020 Revised Edition). <https://sso.agc.gov.sg/Act/ABA1965>

<sup>137</sup> Kwok, J. (2024, March 8). *Forum: AVS looking at strengthening penalties for animal cruelty*. The Straits Times. <https://str.sg/eQyk>

<sup>138</sup> Lee, L. (2023, June 16). *The Big Read: 'Part of the family' — the rising status of pets among households and what it means for society*. TODAY. <https://www.todayonline.com/big-read/big-read-singapore-pets-family-status-society-2194571>

<sup>139</sup> Cheng, I. (2024, January 31). *Animal cruelty and welfare cases surge 79% in 2023, highest in 11 years: SPCA*. The Straits Times. <https://str.sg/hkkW>

<sup>140</sup> Animal & Veterinary Service, NParks. (n.d.). *Cat ownership limits. Keeping cats in HDB flats and private premises*. <https://www.nparks.gov.sg/avs/pets/cat-management-framework/cat-management-framework/cat-ownership-limits>

<sup>141</sup> AsiaOne. (2024, March 5). *More cats abandoned after owners misunderstand new rules*. <https://www.asiaone.com/singapore/more-cats-abandoned-after-owners-misunderstand-new-rules>

Singapore under the leadership of D.F.A. Hervey, the Second Police Magistrate and a Malay language scholar.<sup>142</sup>

8. The primary function of the then-SPCA's leadership was to assist the police in enforcing existing laws related to animal welfare. SPCA officers were compensated \$20 per month for their services. Edward Burton, who was appointed as an SPCA officer, served as a liaison between the police and the public on matters of animal welfare. This included initiating legal proceedings against instances of "everyday cruelty", with the SPCA publicising imposed fines to serve as a deterrent.<sup>143</sup>
9. With the assistance of the SPCA, approximately 20 cases of animal cruelty were prosecuted in Singapore's courts each month. This arrangement continued until 1901, when the responsibility for prosecuting animal cruelty cases was transferred to the Municipal Commissioners.
10. The current proposal seeks to revive and modernise this approach to enable animal welfare organisations to carry out their rescue duties effectively, while alleviating the burden on government resources.
11. Empowering AWGs to assist the authorities may be achieved by inserting the following provisions in the Animals and Birds Act and the Wildlife Act as follows:

#### **Animals and Birds Act**

To insert under Section 2:

"'appointed representatives' means any person appointed under Section 3A by the Director-General or an authorised officer to be an appointed representative."

To insert a Section 3A:

#### **"Authorised officers' assistants"**

**3A.** (1) The Director-General or an authorised officer may be accompanied or assisted by persons necessary for the exercise of the Director-General or authorised officer's powers under this Act.

(2) The Director-General or an authorised officer may appoint representatives from selected animal welfare organisations for the purpose of assisting the Director-General or any authorised officer in administering and carrying out the provisions of this Act.

(3) Appointed representatives may exercise powers under Section 50, 51, or 52A(1)(a).

(4) For the purpose of investigating any offence under this Act, appointed representatives may issue advisories on compliance with the Act or any Code of Animal Welfare issued by the Director-General pursuant to Section 41A of the Act to any person.

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<sup>142</sup> SPCA Singapore. (n.d.). *Who we are*. Retrieved August 18, 2024, from <https://spca.org.sg/who-we-are/>

<sup>143</sup> Barnard, T. P. (2019). *Imperial creatures: Humans and other animals in colonial Singapore, 1819–1942* (pp. 122–133). National University of Singapore Press.

(5) When exercising powers under Section 51, appointed representatives may take into custody any animal or bird for the purposes of providing care to the animal or bird.

(6) A document prepared by an appointed representative on any matter or thing in connection with the administration or enforcement of, or any investigation carried out under this Act, is admissible as evidence in any proceedings under this Act.”

### **Wildlife Act**

To insert under Section 2:

“‘appointed representatives’ means any person appointed under Section 11D by the Director-General or an enforcement officer to be an appointed representative.”

To insert a Section 11D:

### **“Appointed representatives**

**11D.** (1) The Director-General or an enforcement officer may appoint representatives from selected animal welfare organisations for the purpose of assisting the Director-General or any enforcement officer in administering and carrying out the provisions of this Act.

(2) Appointed representatives may exercise powers under Section 10A, 11A, 11B, or 12A.

(3) For the purpose of investigating any offence under this Act, appointed representatives may issue advisories on compliance with the Act to any person.

(4) When exercising powers under Section 11B, appointed representatives may take into custody any wildlife for the purposes of providing care to the wildlife.

(5) A document prepared by an appointed representative on any matter or thing in connection with the administration or enforcement of, or any investigation carried out under this Act, is admissible as evidence in any proceedings under this Act.”

12. In gist, the proposed assistive powers would allow appointed representatives to enter and examine premises, seize and care for any animal, issue advisories to suspected offenders, and allow the documentary evidence recorded by them to be used by AVS and NParks in their enforcement efforts.
13. The powers outlined have been carefully curated and evaluated by the SPCA and ACRES to maximise their assistive potential. The implementation of Recommendation 7 will augment AVS’s work in the enforcement of existing legislation.

***Recommendation 7 will augment AVS’s work in the enforcement of existing legislation.***

### **A. AWGs have a proven track record of successfully assisting the authorities**

14. Established AWGs have a proven track record over the years of successfully assisting the AVS and relevant authorities in safeguarding the health and welfare of animals, both domesticated and

wildlife. Codifying the assistive powers outlined in Recommendation 7 will significantly enhance operational legitimacy by formally recognising the authority and expertise of animal welfare personnel. This recognition fosters greater accountability and trust among stakeholders, including the public, and ensures that collaborative efforts are carried out with clear legal backing. Such legitimacy also minimises operational ambiguities, allowing smoother coordination between the authorities and AWGs and reducing unnecessary bureaucratic hurdles. With a well-defined framework in place, joint operations can achieve greater efficiency, effectiveness, and consistency, ultimately strengthening Singapore's commitment to safeguarding animal welfare.

15. These organisations work regularly with the AVS and have maintained confidentiality and neutrality when handling cases or details of a sensitive nature. They have on multiple occasions rendered swift assistance to the enforcement authorities by providing valuable camera footage, evidence, and testimonies.
16. Collaborations with AWGs have yielded success in numerous project initiatives:

#### **A1. Companion Animals**

17. One such example is the Trap-Neuter-Rehome/Release-Manage (TNRM) programme. Launched in 2018, the AVS-led project, in partnership with four AWGs, successfully trapped and sterilised more than 4,022 free-roaming dogs.<sup>144</sup> Historically, such responsibilities fell under the AVS's mandate. However, by partnering with AWGs, the programme exceeded its initial 70% sterilisation target.
18. The SPCA serves as a lead partner for the programme, taking on key responsibilities such as following up on sightings of unsterilised free-roaming dogs and mediating conflicts arising from the presence of these animals or their feeders.
19. The SPCA has consistently supported AVS's rehoming efforts by taking in animals who are survivors of the illegal cross-border pet trade or confiscated following investigations into neglect or cruelty. Every measure is taken to ensure these animals are responsibly rehomed, while maintaining strict confidentiality regarding their origins. On average, the SPCA has taken in 20 or more animals annually to help the AVS make space for other animals in need.
20. In a recent case involving a domestic helper who fatally abused a dog,<sup>145</sup> the SPCA supported the investigation by liaising with the dog's owner, thoroughly reviewing CCTV footage, and alerting AVS to critical forensic evidence, such as bone remains, to aid in the investigation.
21. On average, the SPCA escalates 25 to 30 cases to AVS each month, providing verified information and as much supporting evidence as possible to assist with further investigations.

<sup>144</sup> Channel News Asia. (2023, November 10). *80% of free-roaming dogs sterilised since introduction of neutering programme in 2018: Desmond Lee*. <https://www.channelnewsasia.com/singapore/free-roaming-dogs-80-cent-sterilised-tnrm-programme-was-introduced-3912076>

<sup>145</sup> Chiu, C. (2024, February 27). *Maid under probe for allegedly beating employer's dog to death*. The Straits Times. <https://str.sg/jAUE>

## A2. Wildlife

22. As Singapore's first dedicated wildlife rescue facility, ACRES is the expert animal welfare group to turn to in cases involving wildlife. Their history with local enforcement dates back over two decades, and ACRES has successfully assisted NParks in various areas of enforcement from the rescue of wildlife to the investigation of the illegal wildlife trade involving live animals, animal parts, and derivatives. Their consistent collaboration with the authorities<sup>146</sup> has yielded much success for local enforcement over the years, clamping down on the illegal wildlife trade and poaching.
23. Successful cases of prosecution not only result in the rescue of critically endangered and protected species but also serve as a strong deterrent against would-be offenders:
  - a. In 2019, ACRES investigated and conducted a trap purchase of a False Gharial, a type of endangered crocodile.<sup>147</sup> Evidence was submitted to AVA, and the culmination of investigations revealed that the trader regularly sold exotic animals as pets and he confessed to trading hedgehogs, Pacman frogs, geckos, and frozen mice. Three hedgehogs were also seized from the trader's home. From the joint efforts of AVA and ACRES, the trader was prosecuted and brought to justice. Reported in news outlets, this case of successful enforcement serves as a deterrent to would-be offenders.
  - b. In response to a tip-off by the public, in 2019, ACRES and NParks collaborated on a joint operation that saw the rescue of two critically endangered Asian Leopard cats (Singapore's last remaining wild cat) who were being kept as pets in an HDB flat.<sup>148</sup> The joint operation was lauded by NParks as a "victory against poachers and the illegal wildlife trade". The animals were rehabilitated by Mandai Nature and safely repatriated back to Malaysia by ACRES in 2020.
  - c. In 2022, acting on a tip-off, ACRES investigated the case of a man illegally keeping wildlife in his possession.<sup>149</sup> Investigation findings were submitted to NParks, and the man was subsequently arrested and fined. The man had been keeping a Sunda slow loris, a protected wildlife species in Singapore, a green iguana, and two sugar gliders.
24. ACRES also conducted in-depth investigations into the trade of animal parts, providing the authorities with precious information to combat the illegal sale of wildlife in Singapore:
  - a. From 2009 to 2010, ACRES embarked on an investigation into the illegal trade of tiger parts in Singapore.<sup>150</sup> The investigation found that 59 out of 134 jewellery and antique shops in Singapore carried alleged tiger parts such as tiger claws, tiger teeth, and tiger

<sup>146</sup> OECD. (2019). *The illegal wildlife trade in Southeast Asia: Institutional capacities in Indonesia, Singapore, Thailand and Viet Nam*. Illicit Trade, OECD Publishing, Paris. <https://doi.org/10.1787/14fe3297-en>

<sup>147</sup> Tang, L. (2020, March 11). *Man fined for trying to sell endangered crocodile, keeping hedgehogs as pets*. TODAY. <https://www.todayonline.com/singapore/man-fined-trying-sell-endangered-crocodile-keeping-hedgehogs-pets>

<sup>148</sup> Chandra, A. (2020, February 7). *2 endangered Asian leopard cats rescued from HDB flat to be returned to wild in Malaysia*. TODAY. <https://www.todayonline.com/singapore/2-endangered-asian-leopard-cats-rescued-hdb-flat-be-retained-wild-malaysia-nparks>

<sup>149</sup> Low, Y. (2022, December 8). *Man gets S\$7,000 fine for keeping critically endangered Sunda slow loris, sugar gliders at his office*. TODAY. <https://www.todayonline.com/singapore/man-gets-s7000-fine-keeping-critically-endangered-sunda-slow-loris-sugar-gliders-his-office-2066421>

<sup>150</sup> ACRES. (2010, February). *An investigation into the illegal trade in tiger parts in Singapore*. <https://acres.org.sg/wp-content/uploads/2015/05/An-Investigation-into-the-Illegal-Trade-in-Tiger-Parts-in-Singapore-2010.pdf>

skin. The evidence from this investigation, which includes an in-depth, thirty-page report with photographs, discussion with storekeepers, and more, was submitted to the AVA for further investigation.

- b. In 2010, ACRES conducted three trap purchases which resulted in the seizure of an allegedly complete tiger skin, three pieces of alleged tiger skin, and one hedgehog.<sup>151</sup> The animal and animal parts were immediately handed over to the AVA who commenced a thorough investigation.
  - c. In 2010, ACRES was tipped off by a member of the public regarding the sale of an alleged bear gall bladder at the Singapore Food Expo.<sup>152</sup> ACRES responded and its investigators arrived at the scene within 30 minutes of the call. ACRES conducted a trap purchase, which led to the seizure of the alleged bear gall bladder by AVA who then commenced investigations.
  - d. In 2015, ACRES investigated over 156 advertisements across six different online platforms for the sale of illegal wildlife as pets and conducted joint sting operations with AVA.<sup>153</sup> The operation, which took over six months, culminated in the seizure of exotic animals such as the critically endangered Asian Leopard Cat (Singapore's last remaining wild cat) and sugar gliders.
25. Apart from enforcement, ACRES has also been a reliable and irreplaceable support to AVS's efforts, offering critical repatriation services to the endangered wildlife seized by authorities. The numerous successful cases of collaboration highlight ACRES's dependability:
- a. In 2004, a vervet monkey and a rhesus macaque, two illegally kept pets, were confiscated during a joint raid with the AVA and were repatriated to their native country of origin (Zambia and India, respectively) through efforts and funds raised by ACRES.<sup>154,155</sup> It is worth noting that ACRES also worked together with the Singapore Zoo in the case of the rhesus macaque.
  - b. In 2015, a tip-off to ACRES resulted in a joint raid with AVA and confiscation of an endangered pig-tailed macaque kept illegally at an industrial estate in Singapore. ACRES facilitated and transported the pig-tailed macaque back to the wild in Malaysia.<sup>156</sup>

<sup>151</sup> ACRES. (2010, September 30). *Sting operations result in seizure of alleged tiger skins and a live animal*. [https://acres.org.sg/wp-content/uploads/2015/05/30\\_sep\\_10\\_sting\\_operations\\_result\\_in\\_seizure\\_of\\_alleged\\_tiger\\_skins\\_and\\_a\\_live\\_animal.pdf](https://acres.org.sg/wp-content/uploads/2015/05/30_sep_10_sting_operations_result_in_seizure_of_alleged_tiger_skins_and_a_live_animal.pdf)

<sup>152</sup> ACRES. (2010, June 2). *Seizure of alleged bear gall bladder at Singapore Food Expo*. [https://acres.org.sg/wp-content/uploads/2015/05/2\\_jun\\_10\\_seizure\\_of\\_alleged\\_bear\\_gall\\_bladder\\_at\\_singapore\\_food\\_expo.pdf](https://acres.org.sg/wp-content/uploads/2015/05/2_jun_10_seizure_of_alleged_bear_gall_bladder_at_singapore_food_expo.pdf)

<sup>153</sup> The Straits Times. (2015, December 21). *ACRES finds 156 online advertisements touting illegal pets*. <https://acres.org.sg/wp-content/uploads/2017/05/Acres-finds-156-online-advertisements-touting-illegal-pets-21st-Dec-2015.pdf>

<sup>154</sup> ACRES. (2004, May 4). *First ever repatriation of a confiscated pet primate*. [https://acres.org.sg/wp-content/uploads/2015/05/4\\_may\\_04\\_first\\_ever\\_repatriation\\_of\\_a\\_confiscated\\_pet\\_primate.pdf](https://acres.org.sg/wp-content/uploads/2015/05/4_may_04_first_ever_repatriation_of_a_confiscated_pet_primate.pdf)

<sup>155</sup> ACRES. (2006, May 19). *Confiscated pet primate journeys to sanctuary in India*. [https://acres.org.sg/wp-content/uploads/2015/05/19\\_may\\_06\\_confiscated\\_pet\\_primate\\_journeys\\_to\\_sanctuary\\_in\\_india.pdf](https://acres.org.sg/wp-content/uploads/2015/05/19_may_06_confiscated_pet_primate_journeys_to_sanctuary_in_india.pdf)

<sup>156</sup> AsiaOne. (2015, August 24). *Endangered pig-tailed macaque rehomed in Malaysia*. <https://acres.org.sg/wp-content/uploads/2017/05/Endangered-pig-tailed-macaque-rehomed-Aug-24th-2015.pdf>



- c. From 2017 to 2019, seven rescued trafficked turtles (one Malaysian giant turtle,<sup>157</sup> four Asian pond turtles, together with two elongated tortoises<sup>158</sup>) who were cared for at ACRES were repatriated back to the wild in Malaysia, through collaboration with AVA and the Perhilitan, the Malaysian Wildlife Department.
  - d. In 2018, ACRES carried out a landmark repatriation for the first time from Singapore, where a batch of 51 Indian star tortoises were repatriated back to the wild in India, followed by a year-long monitoring project.<sup>159</sup>
  - e. In 2020, a tip-off from ACRES resulted in the confiscation of two Asian Leopard cats by NParks. ACRES collaborated with NParks and Mandai Zoo to provide care for the leopard cats, eventually transporting them to Perhilitan for release back into the wild.<sup>160</sup>
  - f. In 2023, ACRES received one black marsh terrapin from NParks and repatriated this turtle, along with two critically endangered turtles from the illegal wildlife trade, back to the wild in Malaysia.<sup>161</sup>
26. While animal welfare organisations such as the SPCA and ACRES have demonstrated expertise and operational readiness in rescuing animals in distress, providing medical care, and advocating for improved animal welfare standards, their ability to enforce these standards remains limited.

#### **B. AWGs would be able to offer specialised support to AVS in key areas**

27. Recent legislature amendments aim to provide effective deterrents and set a benchmark for the humane and respectful treatment of animals. While AVS and NParks safeguard animal health and welfare on a broad and national level, AWGs supplement these efforts with specialised knowledge in their areas of expertise. Although the AVS takes every effort to investigate all cases reported to them, AWGs such as the SPCA and ACRES typically manage a broader range of issues in their areas of expertise and are equipped with the knowledge to address cases falling within their respective scopes. For example, the SPCA specialises in domestic animal cruelty, neglect, and abandonment cases, while ACRES is the go-to for matters concerning wildlife, in particular the illegal wildlife trade, trapping, and poaching.
28. By granting appointed representatives from AWGs assistive powers, the AVS will be able to overcome multiple challenges<sup>162</sup> that currently impact enforcement efficiency. These include a lack of eyewitnesses and direct evidence, delays in case reports, or superfluous information from public reports. With more personnel on the ground, cases can be responded to swiftly, with representatives from AWGs gathering relevant and critical evidence to support investigations.

<sup>157</sup> Khew, C. (2017, February 2). *Wildlife rescue group Acres sends Malaysian giant turtle back home*. The Straits Times. <https://str.sg/3Xza>

<sup>158</sup> Koh, E. (2018, April 16). *Acres repatriates four giant turtles, two endangered elongated tortoises back to Malaysia*. The Straits Times. <https://str.sg/UeT2>

<sup>159</sup> TODAY. (2018, November 26). *Wildlife rescue group sends 51 smuggled star tortoises home to India*. <https://www.todayonline.com/singapore/wildlife-rescue-group-sends-51-smuggled-star-tortoises-home-india>

<sup>160</sup> Chandra, A. (2020, February 7). *2 endangered Asian leopard cats rescued from HDB flat to be returned to wild in Malaysia*. TODAY. <https://www.todayonline.com/singapore/2-endangered-asian-leopard-cats-rescued-hdb-flat-be-returned-wild-malaysia-nparks>

<sup>161</sup> Tan, J. (2023, July 18). *Critically endangered turtles rescued by Acres make their way home to Malaysia*. The Straits Times. <https://str.sg/iwtB>

<sup>162</sup> Animal & Veterinary Service, NParks. (n.d.). *Animal cruelty and welfare cases*. <https://www.nparks.gov.sg/avs/animals/animal-welfare/animal-and-pets-welfare/animal-cruelty-and-welfare-cases>

29. Given their knowledge and experience in animal welfare cases, appointed representatives would be able to assess the evidentiary value of factors discovered at the scene of a suspected offence and record critical information that a layperson might overlook. Such information may include the unique identifiers and body condition of an affected animal, including relevant aspects of their living conditions. This would be extremely relevant in cases involving wildlife, where a witness would need to possess a high degree of specialised knowledge and experience. Not only would such relevant and detailed documentation assist NParks in their investigative efforts, but it would also support prosecution efforts against offenders.
30. As previously mentioned, pet ownership is on the rise,<sup>163</sup> and the number of cases of poor animal welfare and cruelty have correspondingly increased. In 2023, the SPCA reported a 79% spike in animal cruelty and welfare cases, marking the highest figure in 11 years.<sup>164</sup> The recent announcement permitting cats to be kept in HDB flats<sup>165</sup> is also expected to lead to an increase in this number.<sup>166</sup>
31. When it comes to wildlife, Singapore has declared its commitment to the global fight against illegal wildlife trade. Singapore has been a signatory to the Convention on International Trade in Endangered Species of Wild Fauna and Flora since 1986. More recently, Singapore opened its Centre for Wildlife Forensics, recognised as a CITES Reference Laboratory in June 2022.<sup>167</sup> Senior Minister of State for National Development Mr Tan Kiat How has also recognised and espoused the importance of Singapore's regulatory and enforcement tools in the fight against the illegal wildlife trade.<sup>168</sup>
32. Codifying the empowerment of AWG personnel to aid AVS would only strengthen AVS's enforcement powers, bolstering Singapore's dedicated efforts against acts and offences that threaten the welfare and health of our animals. Timely updates to the legislature to address pressing issues such as neglect will not only enhance enforcement mechanisms but also demonstrate Singapore's commitment to animal welfare, ensuring the continued relevance and effectiveness of Singapore's legislation.

### C. AWGs would be able to alleviate the growing strain on the authorities

33. With growing awareness of animal welfare in Singapore, members of the public are increasingly reporting cases of alleged animal neglect and cruelty in their neighbourhood. From 2019 to 2023, AVS consistently received about 1,250 cases of alleged animal cruelty each year.<sup>169</sup> As most of these incidents involve pet animals kept inside homes, feedback providers may report concerns without sight of the animal. It is common for the SPCA's inspectors to attend to cases of this nature

<sup>163</sup> Lee, L. (2023, June 16). *The Big Read: 'Part of the family' — the rising status of pets among households and what it means for society*. TODAY. <https://www.todayonline.com/big-read/big-read-singapore-pets-family-status-society-2194571>

<sup>164</sup> Cheng, I. (2024, January 31). *Animal cruelty and welfare cases surge 79% in 2023, highest in 11 years: SPCA*. The Straits Times. <https://str.sg/hkkW>

<sup>165</sup> Animal & Veterinary Service, NParks. (n.d.). *Cat ownership limits. Keeping cats in HDB flats and private premises*. <https://www.nparks.gov.sg/avs/pets/cat-management-framework/cat-management-framework/cat-ownership-limits>

<sup>166</sup> AsiaOne. (2024, March 5). *More cats abandoned after owners misunderstand new rules*. <https://www.asiaone.com/singapore/more-cats-abandoned-after-owners-misunderstand-new-rules>

<sup>167</sup> Parliament of Singapore. (2022, July 4). *Endangered Species (Import and Export) Amendment Bill*. Second reading bills. <https://sprs.parl.gov.sg/search/#/sprs3topic?reportid=bill-582>

<sup>168</sup> Ibid.

<sup>169</sup> Kwok, J. (2024, March 8). *Forum: AVS looking at strengthening penalties for animal cruelty*. The Straits Times. <https://str.sg/eQvk>

only to discover that there is no breach of the Animals and Birds Act or the Code of Animal Welfare. A similar sentiment was reflected in a forum response by Group Director, AVS, Ms Jessica Kwok:

“For the remaining cases, our investigations showed that most arose from disputes or disamenities caused by pets or community animals, or involved the deaths of community animals, which could be due to non-cruelty-related reasons such as accidental falls from height, fights among community animals or road traffic accidents.”<sup>170</sup>

34. Between 2019 and 2022, only an average of 5% of reports related to genuine animal cruelty.<sup>171</sup> Appointed representatives from animal welfare organisations can serve as first responders, assessing the likelihood of an offence. The SPCA already practises this by updating the AVS’s investigation unit of cases where no violations are found. 73 such cases with no breaches were recorded in 2023.
35. However, when the SPCA encounters an uncooperative pet owner who refuses entry to inspect the animal, the SPCA is left with no choice but to escalate the case to the AVS for their further investigation. This limits the SPCA’s ability to perform a thorough and accurate assessment for the benefit of AVS.
36. In cases involving community and urban animals, AWGs such as the SPCA and ACRES typically have a strong grassroots network of volunteers, community feeders, and caregivers whom they work with on a regular basis. AWGs regularly leverage these networks to track happenings to the community and urban animals, enabling them to collect evidence and investigate a report of animal cruelty thoroughly.
37. There are also instances where an animal’s wellbeing can be improved without resorting to enforcement measures. In such situations, mediation or advising the owners about proper pet care has proven to be sufficient, and AWGs can alleviate the strain on the authorities by counselling the potential offenders and closing the case. With assistive powers, representatives from AWGs can see the case from beginning to end by investigating, assessing, and counselling such cases to a satisfactory closure.
38. Assistive powers would also lend appointed representatives from the AWGs some authority in the eyes of pet owners, offering the much-needed push that may turn the tides of a case from requiring enforcement action to being settled via counselling and mediation.
39. The SPCA has encountered several instances where their advice has helped ensure immediate improvement in the subject animal’s condition:
  - a. On 19 January 2023, a pet cat was reported as being frequently seen sitting on the ledge at an HDB unit in Anchorvale. The SPCA’s inspectors visited the owner and provided them with advice. The owner fully cat-proofed their home.
  - b. On 27 January 2023, there were concerns escalated to the SPCA about two terrapins kept in a dirty tank without a platform at the common corridor of an HDB unit at Yishun Ring Road. The SPCA’s inspectors advised the owner to rehome their terrapins if they were unable to

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<sup>170</sup> Ibid.

<sup>171</sup> Ibid.

provide the necessary care and keep them indoors. The terrapins were rehomed by the owner and, on a follow-up visit to the rehomed residence, the SPCA's inspectors found them to be kept in satisfactory living conditions.

- c. On 4 April 2023, a dog was reported to be left unattended for two days at an HDB unit in Punggol East. The owner requested the SPCA's assistance as the family could no longer commit to the dog's care. To prevent a recurrence of neglect, the SPCA took the dog into their custody for rehoming.
40. Granting assistive powers to appointed AWG personnel would allow AVS to optimise their resources and concentrate on critical areas of enforcement, such as cases of severe cruelty and neglect or animal-related businesses.

#### **D. Real cases where AWGs could have provided support to AVS**

41. Established AWGs such as the SPCA and ACRES are powered by skilled personnel with years of experience and can be considered professionals in their respective fields. Leveraging this expertise and presence on the ground would expedite investigative, enforcement, and mediatory measures, ensuring a more coordinated response to cases where animal welfare is threatened.
42. The SPCA has maintained its inspectorate function since its founding, with two full-time inspectors and a Head of Operations. In its 2023 Annual Report (ending 30 June 2023), the SPCA reported that its inspectorate had investigated over 800 cases of animal cruelty and had rescued 1,892 animals through their rescue services.<sup>172</sup> This decorated history serves to show not only the SPCA's efforts at safeguarding animal welfare even without assistive enforcement powers, but also their expertise in managing animal cruelty and animal rescue situations.
43. These are some examples extracted from the SPCA's case files that demonstrate how having assistive powers could have helped AVS and animals in distress more expediently:
  - a. On 26 October 2021, the SPCA reported to AVS a case of three dogs being left under the hot sun in dirty cages. This case had been the subject of multiple reports from 7 May 2019 and, each time, the SPCA had confirmed the neglect. On 5 January 2022, AVS officers informed the SPCA that the house had been vacated by the time they had visited. Had the SPCA been equipped with the assistive powers outlined in this Recommendation 7, they could have rescued the three dogs and prevented needless suffering.
  - b. On 31 March 2023, the SPCA was alerted to a case of alleged animal neglect at a rental unit in Ang Mo Kio.<sup>173</sup> Over 40 cats were left in the flat after the family had vacated the unit, a clear case of abandonment and neglect. Although the SPCA attempted to work with the owner to rehome the cats and provide veterinary assistance, minimal progress was made without assistive powers. It is uncertain whether the cats have since received the required veterinary care. Had the SPCA been equipped with the assistive powers outlined in this Recommendation 7, they would have taken the cats for veterinary care and sterilisation, preventing further breeding and needless suffering. The SPCA has its own non-profit community animal clinic and

<sup>172</sup> SPCA Singapore. (2023). *Annual Report 2023*. <https://spca.org.sg/downloads/SPCA%20FY22-23%20Annual%20Report%20&%20Audited%20Finances.pdf>

<sup>173</sup> Tan, J. & Koh, S. (2023, August 7). *Housewife accused of hoarding cats in rental flat says she and rescuers working to rehome felines*. The Straits Times. <https://str.sg/i5Uy>

would have been able to take immediate action to safeguard the welfare and health of these 40 lives. As hoarding cases increase,<sup>174</sup> assistive powers will enable AWGs like the SPCA to take much-needed immediate action.

- c. On 9 September 2023, the SPCA and Cat Welfare Society (CWS) were alerted to a case of animal neglect at a rental unit in Bukit Merah.<sup>175</sup> 20 cats spent eight days without food and water in the flat after a sewage pipe had burst, forcing the unit's occupants to leave the premises. While the occupant had permitted the AWGs to remove the cats, both the SPCA and CWS lacked the authority to enter his premises as the owner did not come down to the unit. As a result, a rescue operation that could have been completed in four hours was extended to 12 hours as the AWGs had to await the arrival of authorised officers from the AVS and their third-party trappers. While all 20 cats had survived in this instance, there have been similar cases of neglect where animals have perished.<sup>176</sup> Delays in intervention can result in prolonged suffering, worsening medical conditions, or even death.
44. Similarly, ACRES has a well-documented legacy of investigation efforts against wildlife trapping, poaching, trade, and rescue. ACRES has operated an investigations unit since 2016, with three full-time staff. In its 2022 annual report (ending March 2022), ACRES reported that they had investigated 299 animal crime cases and rescued 4,544 wild animals.<sup>177</sup> Furthermore, The Centre for Urban Greenery and Ecology (CUGE), a division of NParks, developed the Animal Management Certification Programme (AMCP) to develop a professional, competent, and core group of animal management specialists equipped to mitigate human-wildlife incidents while ensuring public and personnel safety and animal welfare. Key individuals in ACRES possess this certification.
  45. Since 2015, ACRES has investigated 427 cases related to possession and abandonment of prohibited wildlife and 228 cases of poaching in Singapore. With their personnel's knowledge and experience, ACRES conducts site visits to verify the presence of a wildlife trap or the keeping of a prohibited animal. Thereafter, without enforcement powers, ACRES prepares a detailed report and submits only verified information to AVS/NParks.
  46. While NParks employs their best efforts to follow up on these cases, they are often able to send investigative officers only weeks after the report is first made. Due to this delay, traps may have been removed by the time of NParks' visit, or the suspect may no longer be around or is not at home, and the case is deemed cold for lack of leads and closed.
  47. In the years 2015–2023, ACRES recorded 92 cases of poaching activity where they verified poaching was ongoing and witnessed the placement of active animal traps within public places, HDB compounds, and private property. These 92 cases were referred to AVA and NParks. However, of these 92 cases, 41 were deemed cold by NParks for lack of leads and closed. At 44%, that is almost half of all poaching cases that were not able to be investigated thoroughly due to operational difficulties.

<sup>174</sup> Liew, I. (2023, June 17). *More than 400 cats found in cases of pet hoarding so far in 2023, as rescuers plead burnout*. The Straits Times. <https://str.sg/i39e>

<sup>175</sup> Hamzah, A. (2023, September 7). *AVS probing alleged animal neglect after 20 cats rescued from Bukit Merah flat*. The Straits Times. <https://str.sg/iTxX>

<sup>176</sup> Tan, J. (2023, June 6). *Two cats rescued from cage after being abandoned in rental flat, skeletal remains of others found*. The Straits Times. <https://str.sg/i3xK>

<sup>177</sup> ACRES. (2022). *Annual Report. Financial year ending March 2022*. <https://acres.org.sg/wp-content/uploads/2023/04/ACRES-Annual-Report-FY-2021-2022.pdf>

48. Of the 92 cases, ACRES could have assisted AVA/NParks by attending to 71 of these reports, or 77% of the total number of verified poaching reports. With the assistive powers outlined in this Recommendation 7, ACRES would have been able to collect admissible evidence in the form of videos, photos, and identification records of the alleged poachers at the time of visit and submit all information to NParks for follow-up action. This would not only reduce the initial workload on the authorities but also give them a concrete starting point for their investigations and potential enforcement action, reducing the number of cold cases. Two examples illustrate the point:
  - a. In 2014 and 2015, ACRES received and responded to multiple reports of poaching attempts to trap Oriental magpie robin birds at Ridley Park, a landed estate. ACRES made several visits to the location and came into contact with the alleged poacher. ACRES took photos and videos of the attempted trapping and submitted them to the AVA, but without the legislative legitimacy of codified assistive powers, such photos and videographic evidence were deemed non-utilisable by the AVA. Despite coming into contact with the suspected poacher, ACRES was also unable to document any of his information for follow-up action. Without sufficient evidence, the case became a cold one.
  - b. Between May 2015 and April 2016, ACRES received and responded to multiple reports of poaching attempts to trap protected wild bird species such as spotted doves and Oriental magpie robins at the landed estate on Linden Drive. ACRES made more than four on-site visits and took several photos of the poaching, as well as documented the suspected poacher's vehicle licence plate number. This information was submitted to the AVA. AVA responded that they were unable to take action as they found no poaching activity when they visited. Despite extensive documentation of the poaching incidents by ACRES, AVA's response was that action could not be taken unless AVA was able to catch the poacher red-handed. If ACRES had had the assistive powers outlined in this Recommendation, their documentation could have supported AVA's investigations. Furthermore, ACRES personnel could have removed the wildlife trap and prevented the further trapping of protected wildlife.
49. All wildlife traps set without the Director-General's written approval contravene Section 5C of the Wildlife Act and constitute an offence. With the assistive powers outlined in this Recommendation, appointed representatives would be empowered to disable, dismantle, or destroy wildlife traps immediately. Being trapped spells not only needless suffering for an animal but may also lead to the animal's death, as in the case of a wild boar in 2019.<sup>178</sup> The death is a painful one, with animals often suffering from stress, dehydration, and injury from efforts to escape.
50. Another case where such an assistive power would have prevented the needless suffering of an animal took place in 2020, where ACRES witnessed an active bird trap hanging from a tree with an attached pulley system. ACRES immediately informed NParks but, before NParks could send a team down, a protected species of wild bird got trapped. The suspected poacher thereafter removed the trap and brought it and the wild bird home. ACRES could only watch as, despite being witnessed, the poacher successfully trapped and brought home a protected species of bird.
51. Being able to issue advisory letters would not only build awareness and education but also cultivate enforcement presence. Should a suspected offender be on-site, ACRES may note down their details and immediately issue them an advisory letter informing them that their actions may

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<sup>178</sup> Ng, H. (2019, March 6). *Wild boar found dead in illegal trap at Lim Chu Kang cemetery a victim of poaching, says Acres*. The Straits Times. <https://str.sg/oRSJ>



contravene the provisions of the Wildlife Act. Such an expedient, on-the-ground response sends a strong deterrent message to would-be offenders that the authorities are keeping a watchful eye to ensure compliance with Singapore's laws.

52. As poaching cases are on the rise,<sup>179</sup> legislation and enforcement action must keep up.
53. The assistive powers would also supplement the authorities' efforts to clamp down on the illegal wildlife trade. As outlined more particularly in Part A2 of this Recommendation, the AWGs are willing and able to perform on-the-ground investigations and submit detailed reports to the authorities. Legitimising this evidence would only smoothen operational difficulties and allow the authorities to use this information in their investigation of cases.
54. Between April 2021 and December 2022, ACRES investigated and confirmed the possession of prohibited wildlife at six different residential locations. ACRES submitted this information to NParks. However, NParks was unable to commence investigations until August 2023. As at November 2024, five of these cases are still pending investigation.
55. Although enforcement action is a complex process that requires thorough investigation, with the assistive powers, ACRES could have rescued the entrapped wildlife. While enforcement action against any person should rightly follow only after thorough investigation, the rescue of a protected species can and should be expedient. ACRES could also have completed the first step of the investigation by collecting information from the relevant residents. Notably, it is suspected that at one of the locations, illegal breeding of a prohibited species of wildlife is taking place. Breeders typically breed to sell. In such instances, a delay in seizure of the animal has a direct correlation with the perpetuation of the illegal wildlife trade in Singapore.

***The scope of Recommendation 7 is sufficiently narrow and limited to prevent an abuse of power.***

56. Recommendation 7 proposes that only the Director-General and authorised officers be empowered to appoint representatives from selected AWGs to assist the authorities in their work. There are several safeguards in place to ensure that the AWG personnel use their powers responsibly.
57. First, the AWG personnel appointed to assist the AVS will be chosen by the Director-General and authorised officers. This ensures that the chosen personnel meet a minimum standard of competence and screening. As outlined in this Recommendation, established AWGs have a long-standing history of successful collaboration with the authorities. The authorities would have a level of familiarity with the AWGs and be able to choose representatives most fit for appointment.
58. Second, there are in place robust certification programmes by CUGE. The Director-General may be guided by the certifications obtained by the AWG personnel in determining the skillset, expertise, and value-add of the AWG personnel.
59. Third, the assistive powers this Recommendation proposes are limited by two key factors. The first is that the use of such powers is limited to assisting the Director-General and enforcement officers. The second is the limitation requiring the use of the assistive powers, aside from issuing advisories,

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<sup>179</sup> TODAY. (2020, September 17). *Two bird trappers fined as prosecutor cites increase in bird poaching.* <https://www.todayonline.com/singapore/two-bird-trappers-fined-prosecutor-cites-increase-bird-poaching>

to be only for the purpose of ascertaining whether any animal is suffering from disease or whether any offence under the relevant Act has been or is being committed.

60. Fourth, the AVS may implement a strict set of regulations that could include but may not be limited to:
  - a. Conducting security background screenings for all appointed representatives
  - b. Providing identification cards that must be carried at all times by the appointed representatives when employing their powers
  - c. Ensuring that authorised animal welfare organisations agree to insure themselves and their representatives, thereby undertaking the risks and liabilities involved in carrying out their work
  - d. Mandating that all appointed representatives adhere to a strict code of conduct
  - e. Carrying out regular audits of the appointed representatives to ensure compliance with the said code of conduct
61. To further safeguard the integrity of the appointed representatives' scheme, the authorities may take reference from the Republic of the Philippines. In the Philippines, pursuant to the Republic Act No. 9147, the Secretary and various law enforcement groups may deputise wildlife enforcement officers from non-government organisations, citizen groups, community organisations, and other volunteers who have undergone the necessary training for this purpose.<sup>180</sup> These wildlife enforcement officers are empowered with full authority to seize illegally traded wildlife and to arrest violators of the Republic Act No. 9147.
62. The Philippines has taken some measures to ensure these wildlife enforcement officers do not abuse their power. Singapore can take similar measures, such as:
  - a. Publishing a public list of the appointed representatives. This ensures transparency and accountability on the part of the appointed representatives.
  - b. Publishing a set of standards and protocols. After conducting consultation workshops with law enforcers, non-government organisations, and other stakeholders, as well as expert peer reviews, the Philippines has published a Wildlife Law Enforcement Manual of Operations.<sup>181</sup> This manual establishes guidelines for monitoring wildlife transport and trade, conducting surveillance, raiding establishments suspected of illegally possessing/selling/displaying wildlife for sale, confiscating illegally possessed/traded/displayed wildlife species, prosecuting cases against wildlife law violators, and related legal concerns.
  - c. Robust training programmes. In 2016, the Palawan Council for Sustainable Development trained and deputised wildlife enforcement officers from local police, local government employees, non-governmental organisations, and volunteer groups. This partnership led to the

<sup>180</sup> Wildlife Resources Conservation and Protection Act (Republic Act No. 9417), Philippines. <https://www.wipo.int/wipolex/en/legislation/details/9575> (Section 30, deputation of wildlife enforcement officers)

<sup>181</sup> Republic of the Philippines. Department of Environment and Natural Resources-Protected Areas and Wildlife Bureau. (2010). *Wildlife Law Enforcement Manual of Operations*. <https://faolex.fao.org/docs/pdf/phi186219.pdf>

apprehension of some of the major wildlife crimes in Palawan.<sup>182</sup> Training can and should be provided in the areas of guidance on the relevant laws, taking photographic evidence, proper investigation and surveillance procedure, and investigation report writing.<sup>183</sup>

63. Many countries worldwide have enlisted the help of non-governmental officers to safeguard animal welfare. With proper management and training, these programmes see success.

***Cases such as Recommendation 7 have seen success both domestically and worldwide.***

64. Similar benchmarks have been set internationally where non-governmental animal welfare organisations have been provided considerably more extensive powers than proposed by this Recommendation. These organisations have complied with regulations and exercised their powers responsibly.
65. The Scottish SPCA's inspectors are granted the authority to enter and search properties with a warrant, seize animals, and issue Animal Welfare Notices. Although the organisation has the power to prosecute, this is considered a last resort. In 2022, the Scottish SPCA prosecuted 90 individuals, resulting in 88 convictions.<sup>184</sup>
66. Member states of the RSPCA Australia (with the exception of Darwin) have the authority to enforce state and territory animal welfare legislation. Between 2022 and 2023, they investigated 58,923 cruelty cases with 237 successful prosecutions.<sup>185</sup>
67. SPCA New Zealand's inspectors are appointed by the Ministry for Primary Industries and have the legal power to remove animals from their owners. Between 2022 and 2023, they received 13,439 welfare reports. While many of these cases did not necessitate legal action, 54 prosecution charges were filed in court, and 27 of these prosecutions have resulted in convictions.<sup>186</sup>
68. In Singapore, the success of the Volunteer Special Constabulary (VSC) programme<sup>187</sup> offers a practical model for this Recommendation. By integrating trained volunteers into policing duties, the VSC has fortified the police force, particularly during critical periods like COVID-19 where they helped with critical operations. With a long history of successful collaborations with the authorities, appointed AWG personnel will be able to augment Singapore's efforts in animal protection.

***Conclusion on Recommendation 7***

69. Recommendation 7 proposes empowering trusted, experienced and skilled personnel from established animal welfare groups with assistive powers to collaborate with the authorities in a more effective manner. With a proven track record of successful collaborations, animal welfare

<sup>182</sup> Republic of the Philippines. Department of Environment and Natural Resources. (2020). *WildLEAP Wildlife Law Enforcement Action Plan 2018–2028*. [https://elibrary.bmb.gov.ph/elibrary/wp-content/uploads/2023/05/dao2020-13\\_wildleap.pdf](https://elibrary.bmb.gov.ph/elibrary/wp-content/uploads/2023/05/dao2020-13_wildleap.pdf)

<sup>183</sup> Republic of the Philippines. Palawan Council for Sustainable Development. (n.d.). *PCSDS capacitates wildlife enforcement officers, wildlife trafficking monitoring unit officers*. <https://pcsd.gov.ph/pcsd-capacitates-wildlife-enforcement-officers-wildlife-trafficking-monitoring-unit-officers/>

<sup>184</sup> Scottish SPCA. (2022, December 31). *Annual report and consolidated financial statements for the year ended 31 December 2022*. <https://www.scottishspca.org/sites/default/files/2023-06/annual-report.pdf>

<sup>185</sup> RSPCA Australia. (n.d.). *RSPCA Australia*. Retrieved August 15, 2024, from <https://www.rspca.org.au/>

<sup>186</sup> SPCA New Zealand. (2023). *SPCA year in review 2022–2023*. [https://www.spcanewzealand.org.nz/downloads/assets/907235/1/spca\\_year-in-review-2022-23\\_3-nov\\_spread-small.pdf](https://www.spcanewzealand.org.nz/downloads/assets/907235/1/spca_year-in-review-2022-23_3-nov_spread-small.pdf)

<sup>187</sup> Tan, S-A. & Chia, O. (2023, October 21). 'The best of both worlds': Volunteer officers celebrate 75 years of assisting the police. The Straits Times. <https://str.sg/3cDh>

groups are a reliable source of expertise and support for the authorities. Codifying assistive powers would enhance operational legitimacy and overcome practical challenges on the ground. Appointed representatives would be able to take swift action in urgent, time-sensitive situations, ensuring animals in need receive prompt care.

70. Recommendation 7 will also strengthen the AVS's capacity to enforce animal welfare laws. By alleviating the burden on the authorities and leveraging the specialised expertise of animal welfare groups, enforcement efforts become more streamlined and efficient. With more personnel on the ground, more cases can be investigated thoroughly and the issuance of advisories would build awareness, spelling a stronger enforcement presence in society and deterring would-be offenders.
71. Established animal welfare groups are already being consulted for their expertise and entrusted with the care of animals for rehabilitation and repatriation. The value-add provided by the specialised experience of animal welfare groups is widely recognised, and codifying the assistive powers would only enhance Singapore's overall strategy for safeguarding animal welfare.

**Recommendation 8:**

**Introduce mandatory licensing conditions for pet groomers and trainers**

1. The Committee recommends introducing mandatory licensing conditions for pet groomers and trainers.
2. These licensing conditions should govern the standards of conduct for individuals undertaking such businesses, including animal care and handling, prerequisite and ongoing professional development, and penalties for non-compliance.

***Introduction to Recommendation 8***

3. The aim of licensing legislation is to ensure that activities are carried out safely, ethically, and in accordance with established standards.
4. In Singapore, licensing of animal-related businesses falls under the purview of the AVS and currently extends to pet shops, animal exhibitions, dog breeders, and pet boarders. These licensing conditions are reviewed from time to time.
5. Failure to comply could result in the revocation of licences and may be treated as a violation of the Animals and Birds Act, necessitating further enforcement actions.
6. The lack of licensing for pet groomers and trainers constitutes a critical gap. Beyond missing an important mechanism to hold these businesses accountable, it also prevents members of the public from being able to verify the qualifications of those entrusted with the care of their pets, leaving them vulnerable to unregulated and potentially harmful practices.

***Pet groomers and trainers exert influence on animal welfare comparable to currently licensed businesses and should be held similarly accountable.***

7. The Five Freedoms (since expanded into the Five Domains Model) is an internationally recognised evidence-based framework cited extensively in the development of animal welfare standards.<sup>188</sup> It includes freedom from hunger and thirst, discomfort, pain, injury, disease, fear and distress, and the freedom to express normal behaviour.
8. These freedoms should apply to pet grooming and training, which involve placing animals in situations they may not be comfortable with, inhibiting their ability to express usual behaviours, and conducting procedures that could cause pain and injury if not done prudently.
9. Currently, the accountability of pet groomers and trainers extends only as far as:
  - a. Recommended minimum standards and best practices for groomers, set forth in the Code of Animal Welfare (for the pet industry)

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<sup>188</sup> RSPCA Australia. (2021, May 18). *What are the Five Freedoms of animal welfare?* <https://kb.rspca.org.au/knowledge-base/what-are-the-five-freedoms-of-animal-welfare/>

- b. Opt-in accreditation of dog trainers under the AVS-Accredited Certified Dog Trainer (ACDT) Scheme. This highlights the more reliable trainers but is not equivalent to licensing and does not ensure minimum standards.
10. On a conceptual level, there is misalignment in the professional demands placed on groomers and trainers versus the rest of the pet industry. But on a practical (more concerning) level, lack of licensing opens the door to errant practices and breaches of animal welfare standards that can have serious consequences.

***Errant practices by pet groomers and trainers have led to serious consequences for animal welfare and undermined public faith in the industry/system.***

11. While cases involving dereliction of duty by pet groomers and trainers are not new, recent incidents have shocked the public and led to calls for regulation.
12. Some examples of offences by pet groomers:
  - a. In the case of PP v Sun Hu (DAC 56995, 2009),<sup>189</sup> the groomer responded to a dog's bite attempt by fatally hitting the dog's head with a metal clipper. He was sentenced to a two-week imprisonment.
  - b. In 2016, Low Chong Kiat was sentenced to six weeks in jail for abandoning 18 pedigree dogs.<sup>190</sup> Low owned a pet grooming school and had kept 30 dogs in the basement where they were used by students of the grooming school. There was also evidence of dog breeding. When the authorities served notice that Low did not have a dog boarding licence and was not allowed to keep the dogs overnight, he abandoned 18 of the dogs over two days.
  - c. In 2017, yet another case surfaced where illegal operations were carried out behind the facade of a pet grooming shop.<sup>191</sup> Desmond Phua had housed unlicensed dogs at the shop and sold them without a pet shop licence.
  - d. In 2024, six dogs were left unattended for more than 30 minutes, with one dog slipping off the grooming table and being fatally strangled by her leash.<sup>192</sup> This case is all the more jarring given that a similar tragedy occurred in 2023, where a dog died under almost identical circumstances when the groomer left for a seven-minute smoke break.<sup>193</sup> The groomer was fined \$8,000 and barred from running any animal-related business for nine months.
  - e. Pet cats have also fallen victim to grooming mishaps such as clipped ears (requiring stitches), cut whiskers, abrasions, and a broken leg from alleged mishandling.<sup>194</sup> Importantly, these

<sup>189</sup> PP v Sun Hu (DAC 56995/2009) cited in Public Prosecutor v Yeo Wee Soon [2020] SGDC 18.

<sup>190</sup> Hussain, A. (2016, September 23). *Pet grooming school owner gets 6 weeks' jail for abandoning 18 dogs*. The Straits Times. <https://str.sg/3zLk>

<sup>191</sup> Koh, V. (2017, November 15). *Pet grooming shop owner faces charges for selling, housing dogs*. TODAY. <https://www.todayonline.com/singapore/pet-grooming-shop-owner-faces-charges-selling-housing-dogs>

<sup>192</sup> Jumadi, L. (2024, July 25). *Dog found hanging from leash after being left alone at pet groomer; NParks investigating*. Channel News Asia. <https://www.channelnewsasia.com/singapore/corgi-dog-dies-pawkins-pet-grooming-hung-leash-nparks-sPCA-4504236>

<sup>193</sup> Low, Y. (2023, May 3). *Dog groomer fined after maltese died from hanging off its own leash as she took smoke break*. TODAY. <https://www.todayonline.com/singapore/fine-dog-groomer-smoking-break-maltese-hanged-leash-2163851>

<sup>194</sup> Loh, R. (2024, August 4). *Dog's death at groomer: Pet owners want stricter rules, noting errant salons can close down, reopen under new name*. Channel News Asia. <https://www.todayonline.com/features/pet-groomers-errant-regulation-certification-2469516>



physical injuries could have long-term effects on the pet's mental wellbeing. For example, the owner of one cat victim said that her "once independent and fearless young feline [had] become incredibly needy and skittish, refusing to go to sleep without her at night".

- f. LèPawtory (a grooming and daycare business) purports to offer pet dental scaling with no sedation or general anaesthesia. Their groomers are said to "[possess] years of experience in dental scaling for all [ages] and sizes", although no mention is made of any veterinary training (see screenshots below). This would be in serious contravention of the Singapore Veterinary Association's position statement on veterinary dentistry<sup>195</sup>:

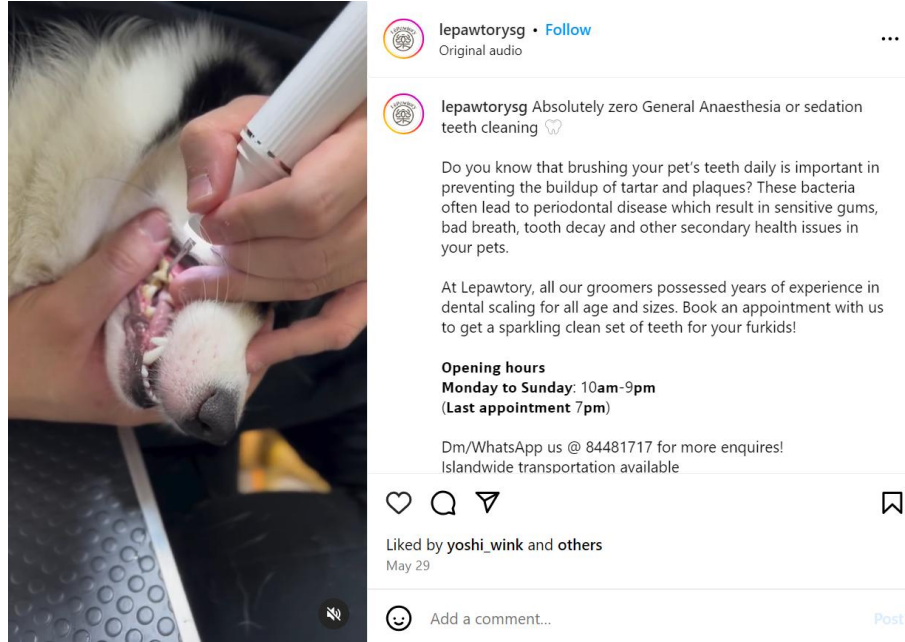
**"The practice of veterinary dentistry should be performed by AVA-licensed veterinary surgeons (or trained veterinary technicians/ nurses under direct veterinary supervision) at AVA licensed premises or veterinary establishments.** The veterinary surgeon will be responsible for the welfare of the patient and all treatments performed on the patient.

**Professional veterinary dental procedures require anaesthesia. To ensure safe anaesthesia, the animal patient should be evaluated by a veterinary surgeon for general health prior to the procedure,** with continual monitoring of the pet during the procedure. Although anaesthesia may never be 100% risk-free, modern anaesthetic techniques, proper patient evaluation and patient care can minimise the risk." (our emphasis in bold)



**Fig. 3:** Example of dental scaling being offered by a pet grooming business. Screenshot from [https://www.instagram.com/p/C\\_UYi0pSf1I/](https://www.instagram.com/p/C_UYi0pSf1I/) (Instagram @lepawtorysg).

<sup>195</sup> Singapore Veterinary Association. (2019, February 24). *SVA position statement on veterinary dentistry by non-veterinarians and veterinary dentistry without anaesthesia*. <https://sva.org.sg/news/veterinary-dentistry/>



**Fig. 4:** Example of a pet grooming business offering teeth cleaning with no anaesthesia or sedation. Screenshot from <https://www.instagram.com/p/C7iY-oHyMMO/> (Instagram @lepawtorysg).

13. The above cases, amongst others, have prompted fervent calls by both pet owners and industry veterans to raise the barriers to entry into the grooming business and to impose harsher penalties when there is non-compliance.<sup>196,197</sup>
14. Some examples of offences by trainers:
  - a. In 2020, professional dog trainer Sabrina Sim left two of her client's dogs in the car boot for an hour and a half, during which the dogs died from heat stress. She was fined \$8,000 and disqualified from being in charge of any animal or class of animals in the course of employment with any animal-related business for six months.<sup>198</sup>
  - b. In 2021, 3Dogs Academy came under scrutiny when their trainers were filmed forcing dogs on a pack-walk into compliance by tugging on their leashes (making a dog yelp) and allegedly kicking one of the dogs.<sup>199</sup>
  - c. In 2022, Matthew Ng of K9 Connection subjected a leashed dog in a kennel to acts of intimidation.<sup>200</sup> He was recorded telling the dog, "Welcome to hell, my friend. Four weeks of

<sup>196</sup> Loh, R. (2024, August 4). *Dog's death at groomer: Pet owners want stricter rules, noting errant salons can close down, reopen under new name*. Channel News Asia. <https://www.todayonline.com/features/pet-groomers-errant-regulation-certification-2469516>

<sup>197</sup> Cil, R. (2024, August 2). *Letter of the week: Impose stricter laws and heavier penalties to regulate pet grooming industry*. The Straits Times. <https://str.sg/dc6s>

<sup>198</sup> Sabrina Sim Xin Huey v Public Prosecutor [2022] SGHC 240.

<sup>199</sup> Chew, H. M. (2021, September 22). *AVS looking into alleged mishandling of dogs by animal trainers in online video*. Channel News Asia. <https://www.channelnewsasia.com/singapore/dogs-pets-training-choke-video-avs-nparks-2194341>

<sup>200</sup> Chan, R. (2022, July 15). *AVS investigates case of dog abuse after video of incident at training centre K9 Connection*. Channel News Asia. <https://www.channelnewsasia.com/singapore/avs-investigates-dog-abuse-video-training-centre-k9-connection-2812291>

hell.” This was followed by shouting in Mandarin and the use of expletives, after which Ng approached the dog with a metal hook and bowl and struck the dog with the bowl.

- d. In 2024, trainers from Xavian & Pack forced a pack of dogs to undergo a photo taking session by pushing one of the dogs into a sitting position and hitting another dog on the head and back.<sup>201</sup> Not long after, a trainer from K9 Matters was seen slapping the side of a dog’s muzzle on a pack-walk.<sup>202</sup>
15. The SPCA has also encountered cases of trainers, and even pet owners, using aversive training devices (e.g. shock or prong collars) on their dogs. This is alarming in light of robust research which shows the ineffectiveness and damaging effects of aversive training on animal behaviour and welfare.<sup>203</sup>

***Pet groomers and trainers are in a privileged position with respect to their earning power and niche (but necessary) services, putting pet owners at a significant disadvantage if these service providers fall short of standards.***

16. Grooming and training are indispensable aspects of pet welfare. They respectively contribute to hygiene and comfort, and to confidence and adjustment.
17. With the recent spate of grooming incidents, some pet owners have elected to groom their pets by themselves. However, vets caution that expert services may still be needed for some breeds such as ragdolls and poodles.<sup>204</sup> Similarly, evidence-based training goes beyond what a layperson can acquire by reading up on the Internet. Even if they build up basic grooming and training skills, not all pet owners have the time or confidence to fully undertake these responsibilities. Their recourse would then be to entrust their pets to commercial groomers and trainers.
18. In sending their pets for grooming and training, owners are not only entrusting their care but also trusting the information that is provided to them. For example, they rely on pet businesses to share accurate information about the grooming procedures and training methods used. In the absence of regulations, businesses are not duty bound to engage in full disclosure and questionable practices may only come to light after a tragedy has occurred, by which time it is too late.
19. The earning power of groomers and trainers has also gone up tremendously. Dog licences have increased from about 70,000 in 2019 to 87,000 in 2022, while the pet cat population was about 94,000 in 2023 (a 10% increase from 2019). Crucially, it is not only pet ownership but also pet attachment that has grown such that owners are spending more on their animal companions.<sup>205</sup> Given the rise in income for groomers and trainers, it seems only reasonable to hold them to higher standards.

<sup>201</sup> Ching, S. J. (2024, January 16). 'Disgustingly inappropriate': Dog trainer suspends staff who were filmed hitting dogs in public. AsiaOne. <https://www.asiaone.com/singapore/disgustingly-inappropriate-dog-trainer-suspends-staff-who-were-filmed-hitting-dogs-public>

<sup>202</sup> Mazliana, S. (2024, April 5). S'pore dog trainer caught on video hitting Labrador's muzzle, SPCA escalating case to authorities. Mothership. <https://mothership.sg/2024/04/trainer-hit-dog-sPCA-spore/>

<sup>203</sup> Ziv, G. (2017). The effects of using aversive training methods in dogs – A review. *Journal of Veterinary Behavior*, 19, 50–60. <https://doi.org/10.1016/j.jveb.2017.02.004>

<sup>204</sup> Loh, R. (2024, August 4). Dog's death at groomer: Pet owners want stricter rules, noting errant salons can close down, reopen under new name. Channel News Asia. <https://www.todayonline.com/features/pet-groomers-errant-regulation-certification-2469516>

<sup>205</sup> Lee, L. (2023, June 16). *The Big Read: 'Part of the family' — the rising status of pets among households and what it means for society*. TODAY. <https://www.todayonline.com/big-read/big-read-singapore-pets-family-status-society-2194571>

20. In fact, as highlighted by the District Judge in PP v Sabrina Sim<sup>206</sup>:

“... the Accused is a professional dog-trainer, having undergone the requisite training to receive accreditation as a dog-trainer. **I agreed with the Prosecution that as a professional dog trainer, the duty of care expected of the Accused was higher than that of a regular person temporarily in charge of a dog.** The Accused had been entrusted with two dogs by its owner for boarding and training over a period of time and the incident could have been avoided if the Accused had established protocols or checks in place when bringing the dogs out. A disqualification, along with the appropriate fine, was necessary to impress that upon the Accused as she continued in her work as a dog-trainer.” (our emphasis in bold)

21. With some people choosing to keep pets over having children, and with an increasing proportion of owners regarding their pets as their babies, the demand for pet services will only rise. There is an urgent need to regulate the grooming and training industry, not just to safeguard animal welfare but also to protect human consumers.

***The pet grooming and training industries are regulated to certain degrees in some countries, setting a precedence that Singapore can take reference from.***

22. South Korea amended its Animal Protection Act in 2022 to require registration of animal grooming businesses,<sup>207</sup> while groomers in China need to hold a licence.<sup>208</sup>

23. In Malta, new legislation was passed in 2024 that require pet groomers to<sup>209</sup>:

- a. Operate only under a licence
- b. Have one individual who is certified in animal first aid
- c. Keep records of the animals groomed
- d. Install a CCTV system
- e. Have an emergency plan
- f. Have an animal health control programme which includes preventive care, nutrition, exercise, and routine veterinary care

24. In Germany, a permit is required for dog schools and anyone who trains dogs commercially or instructs dog owners on training.<sup>210</sup> The permit application involves not just documented proof of professional knowledge and skills, but also an interview by the municipal veterinary office comprising theoretical and practical exams.

25. Licensing conditions could additionally include the following, right from the outset or in a graduated manner as the pet grooming and training fields mature:

<sup>206</sup> Public Prosecutor v Sabrina Sim Xin Huey [2022] SGDC 151.

<sup>207</sup> Animal Protection Act (Republic of Korea). Wholly Amended by Act No. 18853, April 26, 2022. [https://elaw.klri.re.kr/eng\\_mobile/viewer.do?hseq=60704&type=part&key=25](https://elaw.klri.re.kr/eng_mobile/viewer.do?hseq=60704&type=part&key=25)

<sup>208</sup> Hosler, K. (2019, January 13). *Grooming around the globe*. <https://www.groomertogroomer.com/grooming-around-the-globe/>

<sup>209</sup> Ellul, D. (2024, June 28). *Pet groomers, sitters must have licence to operate as overdue rules unveiled*. Times of Malta. <https://timesofmalta.com/article/pet-groomers-sitters-licence-long-overdue-rules-announced.1094590>

<sup>210</sup> Stadt Rosenheim. (n.d.). *Permit requirement for professional training of dogs and dog schools*. <https://www.rosenheim.de/en/buergerservice/tiere-jagd/permit-requirement-for-professional-training-of-dogs-and-dog-schools/>

- a. Require business owners and employees to have a clean conduct with respect to animal cruelty (if re-entry after offending is allowed, the individual should be subject to a close monitoring system)
- b. Specify a caregiver-to-animal ratio for the service provided
- c. Stipulate a mandatory set of prerequisite and continuing education courses for any staff who work in the company for more than three months
- d. Require pre-health checks to ensure an animal is fit to undergo the respective grooming or training procedures, and to prevent the spread of any diseases if the grooming or training were to be conducted in a group setting
- e. Scheduled and random inspections by designated competent authorities

***Recommendation 8 will improve animal welfare and safety.***

- 26. The pet grooming and training industries have become more competitive amidst the burgeoning demand and low barriers to entry. More of such businesses are springing up in Singapore, although the lack of regulation means there are no official statistics on the number of service providers.
- 27. In the absence of a longer disqualification order, offenders can simply shutter their business and start a new one once they have served their penalties. Should the disqualification order remain a modest 12 months, the presence of licensing conditions and stricter penalties would be critical in protecting our animals.
- 28. Overall, the effect would be a rise in industry standards as licensing conditions facilitate the gatekeeping of those entering the industry, while stricter penalties deter practitioners from taking a cavalier approach to animal welfare.

***Recommendation 8 will protect pet owners and accord commensurate weight to the growing significance of human-animal relationships.***

- 29. In the absence of licensing, pet owners have scant information to rely on in deciding which groomer or trainer to engage. Where information is available, it may not always be credible. Yet, these services are crucial in maintaining the health and wellbeing of pets. The implementation of licensing conditions would not only signal which service providers have met the requisite standards but also build the capacity of pet owners to discern the fit between their pet's needs and what a business offers.
- 30. Pet ownership is surging worldwide, with many people opting to have pets over children and treating their pets like bona fide members of the family. Just as a parent would balk at the thought of their child being taught by an uncertified educator (or worse still, an educator with a history of child abuse), pet owners are similarly concerned about whom they entrust their pets to. By adjusting legislation in response to this change in dynamics, the system can evolve to recognise the growing significance of the human-animal bond and rejuvenate public confidence.

***Conclusion on Recommendation 8***

31. Recommendation 8 proposes introducing mandatory licensing conditions for pet groomers and trainers that govern their standards of conduct, including animal care and handling, professional development, and penalties for non-compliance.
32. It would bring the pet grooming and training industries into alignment with other animal-related businesses that are subject to licensing. This is important since pet groomers and trainers exert influence on animal welfare comparable to currently licensed businesses and should be held similarly accountable.
33. The need for accountability is underscored by recent errant practices which have had serious consequences for animal welfare and undermined public confidence. Furthermore, groomers and trainers are in a privileged position with respect to their earning power and niche (but necessary) services such that pet owners are at a significant disadvantage if these providers do not meet standards.
34. Recommendation 8 would not only improve animal welfare but also protect pet owners and recognise the growing significance of the human-animal bond.



### Recommendation 9:

#### Ban the declawing of cats and debarking of dogs

1. The Committee recommends amending the Animals and Birds Act and the Code of Ethics for Veterinarians to ban procedures for declawing cats and debarking dogs.
2. This recommendation is premised on two evidence-based research findings:
  - a. The harm that declawing and debarking may cause to the animal
  - b. The ineffectiveness of these procedures in permanently solving the issues they were meant to address

#### Definition of Terms

3. Declawing is a highly invasive surgical procedure that involves more than the removal of a cat's claws. It is anatomically analogous to amputating a human's fingers at the first joint. This elective surgery is primarily performed to prevent cats from scratching individuals or damaging property, serving human convenience rather than addressing a medical necessity for the animal.
4. Debarking involves the complete or partial removal of a dog's vocal folds to eliminate or reduce barking. Similar to declawing in cats, debarking is primarily done for human comfort such as to reduce noise and minimise disturbance from excessive barking.

#### Detriments to Animal Welfare

5. Declawing and debarking seriously impinge on animal welfare in at least three of the Five Domains<sup>211</sup> – the animal's health, behavioural interactions, and mental state. These welfare concerns have been documented by the American Veterinary Medical Association and are summarised in the points below.<sup>212,213</sup>
6. **Health.** Both declawing and debarking are essentially acts of mutilation, defined by Merriam-Webster as "an act or instance of destroying, removing, or severely damaging a limb or other body part of a person or animal".<sup>214</sup> Declawed cats may experience chronic pain, lameness, and reduced limb function. Debarked dogs are at risk of acute airway swelling, infection, and aspiration pneumonia. Due to development of scar tissue at the vocal folds where the surgery occurred, there is also substantial risk of glottis stenosis (throat narrowing) which leads to exercise intolerance, respiratory problems, collapse, and heat intolerance. In some affected animals, more surgeries are needed to cope with these complications which jeopardises their wellbeing even further.

<sup>211</sup> Mellor, D. J., Beausoleil, N. J., Littlewood, K. E., McLean, A. N., McGreevy, P. D., Jones, B., & Wilkins, C. (2020). The 2020 Five Domains model: Including human-animal interactions in assessments of animal welfare. *Animals*, 10(10), 1870. <https://doi.org/10.3390/ani10101870>

<sup>212</sup> American Veterinary Medical Association. (2019, July 23). *Literature review on the welfare implications of declawing of domestic cats*. [https://www.avma.org/sites/default/files/resources/declawing\\_bgnd.pdf](https://www.avma.org/sites/default/files/resources/declawing_bgnd.pdf)

<sup>213</sup> American Veterinary Medical Association. (2023, March 7). *Literature review on the welfare implications of canine devocalization*. <https://www.avma.org/sites/default/files/2023-08/avma-lit-review-canine-devocalization-0323.pdf>

<sup>214</sup> Merriam-Webster Dictionary. (n.d.). *Mutilation*. Retrieved December 2, 2024, from <https://www.merriam-webster.com/dictionary/mutilation>

7. **Behavioural interactions.** Declawed and debarked dogs are stripped of their ability to engage in natural behaviours. Cats are no longer able to scratch, an instinct which serves important functions such as territorial marking (visual and scent), self-defence, and stretching their large muscle groups. Debarked dogs lose their auditory means of communication (e.g. barking in play, as an alert or a greeting), leaving them with visual and postural cues which may not always be accessible.
8. **Mental state.** Pain and health complications from declawing or debarking would arguably result in a compromised mental state for the animal. There is also the likelihood of chronic stress arising from thwarted desires to engage in instinctual behaviours, especially since declawed cats still show similar frequency of scratching and debarked dogs are still motivated to bark. The only difference is that they are now unable to do so effectively. While studies on cats have yielded mixed findings, evidence suggests that declawed cats are significantly more likely to bite, over-groom (an obsessive-compulsive behaviour), and urinate or defecate inappropriately.<sup>215</sup> For debarked dogs, their needs continue to be unmet although they are now silenced.

### ***Singapore's Current Stance***

9. Proposals to ban debarking and declawing were first raised in Parliament by former MP Louis Ng in 2017<sup>216</sup> and 2019,<sup>217</sup> respectively. To date, NParks maintains that:
  - a. Declawing and debarking are not encouraged, and should only be pursued as an absolute last resort or as an alternative to euthanasia
  - b. The Code of Ethics for Veterinarians offers a framework to regulate declawing and debarking, with non-compliant vets being liable to enforcement action
  - c. There will be continued efforts to educate pet owners on the alternatives to declawing and debarking their pets
10. In 2021, former MP Louis Ng asked the Minister for National Development if they would consider a moratorium on declawing cats and debarking dogs to allow a study of the relationship between such practices and pet euthanasia rates.<sup>218</sup> This was declined by Minister Desmond Lee due to concerns that the moratorium might lead to unnecessary euthanasia of pets. He reiterated the use of declawing and debarking procedures as a last resort for owners to keep their pets, with enforcement action being taken against those who perform such procedures without due justification.

### ***Legal Precedents Across the World***

11. The following places have outlawed declawing and debarking as at 7 December 2023, with others taking steps towards similar bans:

<sup>215</sup> Martell-Moran, N. K., Solano, M., & Townsend, H. G. (2018). Pain and adverse behavior in declawed cats. *Journal of Feline Medicine and Surgery*, 20(4), 280–288. <https://doi.org/10.1177/1098612x17705044>

<sup>216</sup> Parliament of Singapore. (2017, September 11). *Proposal to ban debarking of dogs*. Written answers to questions for oral answer not answered by end of question time. <https://sprs.parl.gov.sg/search/#/sprs3topic?reportid=written-answer-na-3818>

<sup>217</sup> Parliament of Singapore. (2019, November 5). *Proposal to ban practices of declawing cats and debarking dogs*. Written answers to questions for oral answer not answered by end of question time. <https://sprs.parl.gov.sg/search/#/sprs3topic?reportid=written-answer-na-5419>

<sup>218</sup> Parliament of Singapore. (2021, February 26). *Study relationship between imposing moratorium on declawing cats and debarking dogs versus pet euthanasia*. Written answers to questions. <https://sprs.parl.gov.sg/search/#/sprs3topic?reportid=written-answer-7343>

- a. Declawing of cats is banned in 38 countries (except in cases of “severe injury or disease of the claw”), in two U.S. states and various cities of seven other states, and in eight of Canada’s 10 provinces<sup>219</sup>
  - b. Debarking of dogs is banned in several U.S. states, United Kingdom, European Union, New Zealand, Australia, and in four of Canada’s 10 provinces<sup>220</sup>
12. In 2022, former MP Louis Ng asked if the Ministry for National Development had studied the banning of declawing and debarking in other countries.<sup>221</sup> Minister Desmond Lee cited the laws in the U.S. (New Jersey, Massachusetts, Maryland), New Zealand, and Australia (Queensland, Victoria) which prohibit these procedures unless for medical or health reasons. He explained that NParks’ stance was aligned with the practices in these jurisdictions and offered owners an alternative to giving up or euthanising their pets.

### ***Debarking and Declawing May Be Spurious Solutions***

13. The evidence points to declawing and debarking as being superficial solutions rather than viable long-term alternatives to pet surrenders or euthanasia, even as a last resort.
14. Foremost, declawing and debarking may block the “symptoms” but they do not remove the root of the problem. Declawed cats and debarked dogs are no less reduced in their inclination to scratch or to bark, and their underlying needs continue to exist.
15. Declawing and debarking are deceptively reinforcing for pet owners, who may assume that the problem has been solved. In actual fact, they have only reduced the damage from scratching and the noise from barking, but not the motivation or behaviour. For example, excessive barking in dogs is usually linked to welfare and may be due to poor training, boredom, lack of socialisation, territoriality, and behavioural challenges such as anxiety<sup>222</sup> which require specific interventions for sustained management.
16. Without scratching and barking as outlets, the animal’s unmet needs could be redirected into other undesirable behaviours that owners must then manage:
  - a. Declawed cats may exhibit more biting, over-grooming (an obsessive-compulsive behaviour), and inappropriate elimination
  - b. Debarked dogs may find other means of expression, such as biting
17. Even assuming that declawing and debarking are effective in behavioural management, cats can experience claw regrowth and dogs may regain a near-normal bark within months of the debarking surgery. This makes the procedures unsustainable even as a last resort, as serious animal welfare

<sup>219</sup> PETA. (2023, December 7). *Cat-friendly cities, states, and countries where declawing is illegal*. Retrieved December 2, 2024, from <https://www.peta.org/blog/where-declawing-is-illegal/>

<sup>220</sup> BC SPCA. (2023, December 7). *Important update: BC SPCA calls for ban on dog debarking*. <https://spca.bc.ca/news/bc-sPCA-calls-for-ban-on-dog-debarking/>

<sup>221</sup> Parliament of Singapore. (2022, September 13). *Studies on why other countries have banned practice of debarking dogs and declawing cats*. Written answers to questions. <https://sprs.parl.gov.sg/search/#/sprs3topic?reportid=written-answer-11386>

<sup>222</sup> American Veterinary Medical Association. (2023, March 7). *Literature review on the welfare implications of canine devocalization*. <https://www.avma.org/sites/default/files/2023-08/avma-lit-review-canine-devocalization-0323.pdf>

concerns would be raised if a cat or dog were subjected to multiple declawing or debarking surgeries.

***Conclusion on Recommendation 9***

18. Declawing and debarking are not currently banned in Singapore as they are taken to be a better alternative to pet surrenders or euthanasia. However, evidence suggests that these procedures may not be viable (or justifiable) even as a last resort, given the harm they cause to animal welfare and their ineffectiveness in permanently solving the human inconveniences they were meant to address.
19. For these reasons, the Committee recommends amending the Animals and Birds Act and the Code of Ethics for Veterinarians to ban declawing and debarking except in cases of severe injury where a medical professional determines the procedure is necessary to save the animal's life.



A close-up, slightly blurred photograph of a light-colored cat, possibly a Ragdoll, looking directly at the camera. The cat has long, white fur with some light tan markings on its face and ears. Its eyes are a striking blue-green color. The background is a soft, out-of-focus grey.

STRENGTHENING PROTECTIONS FOR ANIMAL WELFARE

**AREA 3** COMPANION ANIMAL  
PROTECTION

**Recommendation 10:**

**Increase animal welfare standards in pet breeding farms**

1. The Committee recommends amending the Licensing Conditions for Pet Breeders, the Animals and Birds Act, and improving enforcement with the aim of increasing animal welfare standards in pet breeding farms. The new standards should be in line with minimum standards in the Code of Animal Welfare (for the pet industry), stakeholder feedback, public consultations, and international standards.
2. This includes:
  - a. Improving housing conditions within individual breeding lodges and The Animal Lodge (“TAL”)
  - b. Providing structured education for potential buyers
  - c. Proposing guidelines for the breeding process
  - d. Updating the training course for breeders and improving bookkeeping processes

***Introduction to Recommendation 10***

3. In 2022, in response to an increased number of reports on animal abuse in dog boarding and breeding facilities, AVS announced changes to the licensing conditions for pet boarders and breeders in Singapore. AVS also mentioned that the proposed revisions took reference from overseas standards such as the United Kingdom (UK).<sup>223</sup>
4. The new changes from 2022 aimed to improve the healthcare and wellbeing of animals, mandate daily and annual health checks for dogs and puppies, and provide better record-keeping on the condition of animals in the breeding facility. The changes also introduced requirements to improve animal socialisation and provide enrichment. These measures acknowledge animals' capacity for suffering and their need for mental wellbeing.
5. Since 2022, there have been improvements made in the animal welfare industry beyond Singapore. In March 2024, the UK introduced an Animal Welfare Bill, with Member of Parliament Selaine Saxby acknowledging that, “pets are more than just property; they are family. The Bill will ensure that pets are not sold or traded as objects.”<sup>224</sup> This new status of pets as family in the UK has marked a greater emphasis on pet welfare.
6. Furthermore, public consultations with stakeholders, AWGs, and breeders have revealed gaps in the implementation of current measures as well as other areas that require further attention.
7. Therefore, the following recommendations aim to match global developments in animal welfare legislation and respond to feedback from stakeholders consulted in the writing of this section.

***Recommendation 10 will help facilitate better housing conditions in pet breeding facilities and TAL.***

<sup>223</sup> Tan, F. (2021, July 8). AVS proposes new licensing conditions for dog breeders & pet boarders, open to public feedback till July 31. Mothership. <https://mothership.sg/2021/07/pet-licensing-conditions-avs/>

<sup>224</sup> UK Parliament. Hansard. (2024, March 15). *Animal Welfare (Import of Dogs, Cats and Ferrets) Bill*. Volume 747: debated on Friday 15 March 2024. Second reading. [https://hansard.parliament.uk/Commons/2024-03-15/debates/CD456FEB-9942-469A-9841-6A9224220284/AnimalWelfare\(ImportOfDogsCatsAndFerrets\)Bill](https://hansard.parliament.uk/Commons/2024-03-15/debates/CD456FEB-9942-469A-9841-6A9224220284/AnimalWelfare(ImportOfDogsCatsAndFerrets)Bill)



### For individual pet breeding facilities

8. Singapore's dog and cat licensing conditions currently stipulate guidelines in Section 2 that promote clean and ethical housing for the animals within breeding facilities. The licensing conditions were last updated in 2021 (for dog breeders) and in 2024 (for cat breeders). While cat licensing conditions have recently been updated, there have been further global developments in dog breeding legislation that warrant our attention.
9. In the European Union, dog breeders are required to prepare dogs and puppies to integrate into a community. This includes being able to socialise them with humans and other animals. While Section 2.7 of the Licensing Conditions for Dog Breeders in Singapore mandates that "without prejudice to Clause 2.6, breeding dogs and their puppies must be provided with secured areas for exercise, social interactions and enrichment amongst themselves at least once a day",<sup>225</sup> the guidelines provided in the licensing conditions are not as comprehensive.
10. These guidelines also contradict the minimum standards laid out in the Code of Animal Welfare Section 5.3.2, which states that "Animals must be allowed sufficient space and opportunity to exercise at least twice daily, or as appropriate to the species and health status of the animal."<sup>226</sup>
11. In the United States, the 117<sup>th</sup> Congress debated and passed the Puppy Protection Act of 2021<sup>227</sup> which stipulated new conditions for the housing environment for dogs. This includes temperature control, standardising the measurement of dogs to indoor space provided, and providing dogs with meaningful socialisation. While Singapore's guidelines focus on basic welfare standards, there is potential to refine them further.
12. In Singapore, members of the public, animal welfare organisations, and breeders have voiced concerns that existing measures remain insufficient. Reports from new pet owners and industry personnel highlight a troubling prevalence of puppies from local mills exhibiting signs of reactivity and aggression. These behavioural issues are often linked to inadequate exposure to environments beyond breeding lodges, disrupted circadian rhythms due to prolonged confinement in darkened rooms with artificial lighting, and poor socialisation, particularly during the critical 12- to 16-month developmental window. Additionally, numerous accounts describe puppies resorting to playing with or consuming their own faeces. According to dog trainers, this behaviour is attributed to the lack of toys and mental stimulation.
13. To update licensing conditions for housing and management of the environment according to the Code of Animal Welfare's minimum standards, breeder and stakeholder concerns, and in accordance with international guidelines, the Committee proposes the following additions to Section 2 of the dog breeding licensing conditions:
  - a. Licensees must ensure that dogs are kept at a temperature appropriate for the age, breed, and condition of each dog
  - b. Section 2.4 is to be amended by adding that grid-type or wire flooring should be banned

<sup>225</sup> Animal & Veterinary Service, NParks. (n.d.). *Terms and conditions for breeding*. <https://www.nparks.gov.sg/avs/-/media/avs/resources/farm/breeding-conditions.pdf>

<sup>226</sup> Animal & Veterinary Service (formerly Agri-Food & Veterinary Authority of Singapore). (2016). *Code of Animal Welfare (for the pet industry)*. [https://www.nparks.gov.sg/avs/-/media/avs-caw-pet-industry-full-\(eng\).pdf](https://www.nparks.gov.sg/avs/-/media/avs-caw-pet-industry-full-(eng).pdf)

<sup>227</sup> Puppy Protection Act of 2021 (United States). <https://www.govinfo.gov/content/pkg/BILLS-117s1385is/pdf/BILLS-117s1385is.pdf>

- c. Cages, enclosures, and/or kennels where dogs are kept should have access either to natural light or to an artificial lighting system that provides the full spectrum of natural white light for at least 10 hours per day, as well as a period of at least eight hours of darkness on a regular schedule. Moreover, “In constant photoperiods of 12 hours of light and 12 hours of darkness or 14 hours of light and 10 hours of darkness, estrous periods should occur with equal incidence throughout the year”,<sup>228</sup> meaning more regular and healthy breeding intervals in bitches.
  - d. Licensees must expose each dog to a variety of textures, flooring, lighting, domestic equipment, and furniture
  - e. Licensees must strictly comply with using only positive reinforcement when training or socialising an animal
  - f. Licensees must ensure that the caregiver to animal ratio is regulated<sup>229</sup>
  - g. Licensees must ensure that at least one trained personnel is in the breeding facility at all times
  - h. Licensees should ensure that enclosures provided have visual, auditory, and/or olfactory enrichment for dogs. Toys that are safe and regularly sterilised must be provided for dogs and rotated depending on the dogs’ interests.<sup>230</sup>
  - i. Licensees should avoid group housing for animals exhibiting reactivity
  - j. Licensees should avoid keeping puppies individually after being weaned, if possible
  - k. Licensees should avoid separating nursing puppies before 12 weeks old<sup>231</sup>
  - l. Cleaning products used must be non-toxic to dogs and the environment
14. In accordance with the shift in perception of animals from property to family, worldwide and in Singapore, the Committee proposes adding clauses that emphasise animal welfare principles into the licensing conditions for pet breeders. This includes the Five Domains of animal welfare, recognising animals’ sentience and ability to feel physical and mental suffering.

#### **Lack of freedom of movement and opportunities to exercise**

15. Clause 2.7 of the Licensing Conditions for Dog Breeders requires licensees to provide “secured areas for exercise, social interactions, and enrichment amongst themselves at least once a day”.

<sup>228</sup> National Research Council (US) Committee on Dogs. (1994). *Laboratory Animal Management: Dogs*. National Academies Press (US). <https://www.ncbi.nlm.nih.gov/books/NBK236596/>

<sup>229</sup> EU Platform on Animal Welfare. (2020, November 3). *Responsible dog breeding guidelines*. [https://food.ec.europa.eu/system/files/2020-11/aw\\_platform\\_plat-conc\\_guide\\_dog-breeding.pdf](https://food.ec.europa.eu/system/files/2020-11/aw_platform_plat-conc_guide_dog-breeding.pdf) (Section 4)

<sup>230</sup> Ibid., [Section 5.4, p. 23].

<sup>231</sup> Recommendation by the SPCA Singapore.

However, it does not specify the duration of these interactions or the standards for the “secured areas for exercise”.

16. During interactions with patrons at the Animal Lodge, several dog breeders mentioned dogs not being exposed to environments beyond the breeding lodge. These breeding facilities are usually dark, poorly ventilated, and do not provide suitable space for proper exercise.
17. In response to a parliamentary question posed by former MP Louis Ng on 27 February 2023 on “Dog Deaths at Dog Farms and Pet Shops and Top Three Causes”, Minister Desmond Lee responded that, “The number of dogs reported to have died at dog farms and pet shops since 2019 is in Table 1. The majority of the dogs in these premises died of chronic diseases, such as cancer, kidney disease and diabetes.”<sup>232</sup> The table is appended below:

Table 1: Number of Dogs that Died at Dog Farms and Pet Shops

Year	Dog Farms	Pet Shops
2019	134	14
2020	188	25
2021	546	24
2022	221	28

**Fig. 5:** Screenshot of Table 1 from parliamentary records showing dog mortality rates at dog farms and pet shops from 2019 to 2022 (<https://sprs.parl.gov.sg/search/#/sprs3topic?reportid=written-answer-12949>).

18. The main causes of death at breeding farms are ascribed to long-term health conditions. Scholars believe that such long-term health conditions are affected by both diet and exercise.<sup>233,234</sup>
19. Based on public consultation with TAL patrons, they were informed by some storeowners and breeders that their dogs eat complete, high-quality food from reputable kibble brands such as Fromm and Royal Canin. Most breeders also provide their dogs with varied whole foods, such as fish and vegetables, to supplement their kibble diet. The diet of dogs appears to be well-regulated and enforced among the farms.
20. However, kennels at TAL measure 4.8m by 1.7m, with up to around 10–15 dogs depending on size and breed. Some breeders choose to house dogs in smaller cages, with reported measurements of 50cm by 80cm. Many breeders are afraid for the biosecurity of their unvaccinated puppies, and puppies are consequently kept in these small cages for years before they are sold.

<sup>232</sup> Parliament of Singapore. (2023, February 27). *Dog deaths at dog farms and pet shops and top three causes*. Written answers to questions. <https://sprs.parl.gov.sg/search/#/sprs3topic?reportid=written-answer-12949>

<sup>233</sup> Rand, J. S., Fleeman, L. M., Farrow, H. A., Appleton, D. J., & Lederer, R. (2004). Canine and feline diabetes mellitus: Nature or nurture? *The Journal of Nutrition*, 134(8), 2072S-2080S. <https://doi.org/10.1093/jn/134.8.2072S>

<sup>234</sup> Batiari, L. (n.d.). *Diabetes in pets: Biggest risk factors to know*. Retrieved November 30, 2024, from <https://www.pawlicy.com/blog/diabetes-in-pets/>

21. Considering the lack of space to move around in the kennels, and the small outdoor space shared by the 20 lodges in the facility, there is currently more that can be done to give dogs greater freedom of movement and adequate exercise space to prevent such health conditions in the future.
22. Scientific literature has shown that exercise and environment are important to preventing diabetes and other long-term health conditions. Despite the healthy diet reported by breeders, the lack of access to adequate spaces for exercise, along with data on number of dog deaths and main causes of death, suggests a likely correlation between exercise and the statistics. Considering there are 22 dog farms in Singapore,<sup>235</sup> this is an average of at least 10 deaths a farm every year. The global progress on dogs' exercise regulations and the higher rates of dog sales in recent years indicate a pressing need to address freedom of movement and exercise at local mills.
23. Therefore, the Committee recommends adding a new clause to Sections 2 and 4 of the Licensing Conditions for Dog Breeders to include mandatory exercise and free roaming times for dogs, depending on age, diet, and health condition. Taking inspiration from German and American legislation on dog farms, dogs should be provided with a minimum of four hours of social interaction and/or enrichment a day. In other cases, the amount of enrichment and socialisation to be provided must be adequate for the dog's breed, age, and health condition.<sup>236</sup> Veterinary care does not contribute to the four-hour interaction time.<sup>237</sup> Dogs should be introduced to new enrichment gradually with positive reinforcement.<sup>238</sup> The Committee also advises that the exercise spaces comply with the recommendations made and, if possible, there should be mandatory outdoor exposure for both breeding dogs and puppies.

### **Housing conditions for breeding dogs**

24. The current Licensing Conditions for Dog Breeders stipulate the housing conditions for pregnant, whelping, and nursing dogs. Clause 8.5 ensures that dogs kept together minimally do not fight with one another. Clause 8.3 of the licensing conditions also gives the dimensions for housing dogs individually.
25. McMillan et al. (2011) studied the mental health of dogs formerly used as "breeding stock" in breeding farms. They found that breeding dogs housed individually with little socialisation "were reported to have developed long-term fears and phobias, compulsive behaviours such as circling and pacing, possible learning deficits, and are often unable to cope fully with normal existence".<sup>239</sup>
26. The Committee therefore recommends that no more than two adult dogs be kept together in the same kennel, and that enclosures must provide visual, auditory, and olfactory enrichment that are regularly sterilised and rotated depending on the dogs' interests.<sup>240</sup>

<sup>235</sup> Animal & Veterinary Service, NParks. (2024, July). *List of licensed dog & cat breeders*. <https://www.nparks.gov.sg/-/media/avs/resources/farm/list-of-licensed-dog-and-cat-breeders.pdf>

<sup>236</sup> Tierschutz-Hundeverordnung (Germany). <https://www.gesetze-im-internet.de/tierschhuv/BJNR083800001.html> (German Animal Welfare Dog Regulations, Clause 2).

<sup>237</sup> Puppy Protection Act of 2021 (United States). <https://www.govinfo.gov/content/pkg/BILLS-117s1385is/pdf/BILLS-117s1385is.pdf>

<sup>238</sup> Australian Veterinary Association. (2021, November 5). *The use of punishment and negative reinforcement in dog training*. <https://www.ava.com.au/policy-advocacy/policies/companion-animals-dog-behaviour/the-use-of-punishment-and-negative-reinforcement-in-dog-training/>

<sup>239</sup> McMillan, F. D., Duffy, D. L., & Serpell, J. A. (2011). Mental health of dogs formerly used as 'breeding stock' in commercial breeding establishments. *Applied Animal Behaviour Science*, 135(1–2), 86–94. <https://doi.org/10.1016/j.applanim.2011.09.006>

<sup>240</sup> SpiritDog Training. (n.d.). *Crating two dogs together*. <https://spiritdogtraining.com/behavior/crating-two-dogs-together/>

27. In line with Section D3.5 of the Code of Animal Welfare (for the pet industry),<sup>241</sup> the Committee also recommends that Section 2 of the Licensing Conditions for Dog Breeders mandate a whelping area designed to meet the needs of both mother and puppies. A whelping box should be provided for the breeding bitch at a height inaccessible to her puppies to provide her space away from the puppies, if needed.

### **Ensuring adequate exercise opportunities at TAL**

28. Constructed in 2017, TAL is a facility for animal shelters and businesses such as pet breeders and boarders. Currently, more than 20 establishments reside in TAL which is managed by AVS. NParks aims to use TAL to provide tenants and visitors a safe, clean, and enjoyable experience in breeding and buying animals.<sup>242</sup>
29. TAL was also constructed in line with the guidelines in the Licensing Conditions for Pet Breeders. This includes Section 2.1 where every dog must be provided an area that is sheltered and well-ventilated, Section 2.6 which stipulates that puppies and breeding dogs be separated from other animals on the premises, and Section 2.7 which provides breeding dogs and puppies with secured areas for exercise and enrichment.
30. However, during public interactions with patrons at TAL, many dog breeders admitted to not giving the dogs exposure to varied environments and stimuli that would better orientate them to life beyond the farm. Many dogs are also not given the opportunity for outdoor interaction and spend the majority of time in their cages or interacting with prospective buyers. This contradicts Section 2.7 of the licensing conditions for dog breeders. Breeders mentioned difficulties in meeting this guideline due to the small space available in TAL for exercise, social interaction, and enrichment. Since breeding dogs and puppies cannot come into contact with any other animal on the premises, the time that breeders can take dogs out into the exercise area must be staggered and limited. Most of the breeders do not use the turfed dog run for fear that unvaccinated dogs may contract diseases that would affect their stock. This directly infringes Section 5.3.2. of the Code of Animal Welfare's minimum standards that "animals must be allowed sufficient space and opportunity to exercise at least twice daily, or as appropriate to the species and health status of the animal".<sup>243</sup>

<sup>241</sup> Animal & Veterinary Service (formerly Agri-Food & Veterinary Authority of Singapore). (2016). *Code of Animal Welfare (for the pet industry)*. [https://www.nparks.gov.sg/avs/-/media/avs\\_caw-pet-industry-full-\(eng\).pdf](https://www.nparks.gov.sg/avs/-/media/avs_caw-pet-industry-full-(eng).pdf)

<sup>242</sup> Animal & Veterinary Service, NParks. (n.d.). *The Animal Lodge (TAL)*. [https://www.nparks.gov.sg/avs/who-we-are/our-centres/the-animal-lodge-\(tal\)](https://www.nparks.gov.sg/avs/who-we-are/our-centres/the-animal-lodge-(tal))

<sup>243</sup> Animal & Veterinary Service (formerly Agri-Food & Veterinary Authority of Singapore). (2016). *Code of Animal Welfare (for the pet industry)*. [https://www.nparks.gov.sg/avs/-/media/avs\\_caw-pet-industry-full-\(eng\).pdf](https://www.nparks.gov.sg/avs/-/media/avs_caw-pet-industry-full-(eng).pdf) (Section 5.3.2)



**Fig. 6:** Turfed dog run available in The Animal Lodge (TAL). Image from [https://www.nparks.gov.sg/avs/who-we-are/our-centres/the-animal-lodge-\(tal\)](https://www.nparks.gov.sg/avs/who-we-are/our-centres/the-animal-lodge-(tal))

31. The lack of opportunities to exercise has led to severe health consequences, as mentioned above.
32. Therefore, the Committee recommends that TAL's outdoor facilities be expanded and remodelled to allow for multiple lodges of dogs to enjoy outdoor exercise and interactions simultaneously, so that breeders can better comply with Section 2.7 of their licensing conditions.
33. To cater to breeders who are anxious about taking their unvaccinated dogs outside of the lodge, the Licensing Conditions for Dog Breeders can mandate a space with minimum size requirements to allow dogs room for exercise and play. This space should be sanitised before and after play and include a variety of toys, textures, and opportunities for socialisation.

#### **Ensuring adequate housing at TAL**

34. Patrons at TAL have reported that some thick-haired dogs presented with wet and matted fur and that most, if not all dogs, were housed in cages with grid floors. As most windows are tinted or blocked off, the dogs are not exposed to natural light and ventilation is limited. Patrons reported a strong faecal and urine smell. Dogs were also housed facing each other and, as shown in the images below, the meshed floors fail to support the weight of the animal, and the floors are not kept clean and dry. This is in direct contravention of Sections 2.1 and 2.6 of the licensing conditions, and of the minimum standards set out in the Code of Animal Welfare.





**Fig. 7:** Larger dogs being housed with grid flooring and lack of natural light and ventilation.

35. Poor ventilation in breeding lodges can have severe health consequences on humans on the premises, including dog breeders (long-term exposure to fumes) and vulnerable patrons such as children and the elderly. Fumes emitted from animal waste include ammonia, hydrogen sulphide, and volatile organic compounds such as benzene and acetaldehyde, which not only cause negative emotional reactions in humans and dogs but may also be carcinogenic and affect respiratory and nervous health in extreme cases.<sup>244</sup>
36. The government recognises this, stating in Sections A2.5 and A2.6 of the Code of Animal Welfare (for the pet industry) that dogs must be kept in an area that is “clean and kept sanitary” and “well ventilated but not draughty”.<sup>245</sup>
37. Therefore, the Committee recommends that TAL enforce the removal of obstructive materials on the windows of the lodge to allow natural light and better ventilation in the housing spaces. Obstructive materials include but are not limited to corrugated boards, cardboard, and closed windows. A new clause can also be added to the Code of Animal Welfare Section D and the Licensing Conditions for Dog Breeders prohibiting the obstruction of windows and vents.

#### **Addressing pest concerns at TAL**

38. Currently, Section 2.8 of the Licensing Conditions for Dog Breeders<sup>246</sup> states that breeders must ensure “An adequate pest control programme as well as daily sanitation and cleaning regime... to keep the facilities clean and free of pests at all times”. Section 3.2 stipulates that “Opened packets of dry food must be stored in a cool and dry environment with protection against pest infestation”. While the licensing condition makes an effort to protect both humans and pets from pests, breeders at TAL have reported difficulty in warding off pests like rats and cockroaches, despite abiding by Sections 2.8 and 3.2. It is difficult for breeders to discern if pests are entering their facilities from other lodges or from surrounding areas, and to properly address pest infestation problems.

<sup>244</sup> Cao, T., Zheng, Y., & Dong, H. (2023). Control of odor emissions from livestock farms: A review. *Environmental Research*, 225, 115545. <https://doi.org/10.1016/j.envres.2023.115545>

<sup>245</sup> Animal & Veterinary Service (formerly Agri-Food & Veterinary Authority of Singapore). (2016). *Code of Animal Welfare (for the pet industry)*. [https://www.nparks.gov.sg/avs/-/media/avs\\_caw-pet-industry-full-\(eng\).pdf](https://www.nparks.gov.sg/avs/-/media/avs_caw-pet-industry-full-(eng).pdf) (Section A2.5–A2.6)

<sup>246</sup> Animal & Veterinary Service, NParks. (n.d.). *Terms and conditions for breeding*. <https://www.nparks.gov.sg/avs/-/media/avs/resources/farm/breeding-conditions.pdf>

39. The Committee therefore recommends that NParks also carry out regular pest control programmes in public facilities at TAL.

***Recommendation 10 will promote structured education for potential buyers.***

**For individual buyers**

40. Existing measures to inform potential buyers about proper care for dogs and cats are limited to the mandatory Pet Ownership Course for Cat and Dog Owners, which involves a free 30-minute online course offered in English, Mandarin, Malay, and Tamil without any course assessment.<sup>247</sup> While this measure provides a safeguard against uninformed and irresponsible pet ownership, it may not be sufficient to educate potential buyers on the practical requirements for their pet of choice.
41. Singapore is comparatively relaxed in their education of potential buyers. For example, in Australia, the Responsible Dog Ownership Course consists of four sections on (1) Rights and responsibilities, (2) Dog welfare and management, (3) Dog behaviour, and (4) Dog training.<sup>248</sup> The Responsible Cat Ownership Course consists of three sections, namely, (1) Rights and responsibilities, (2) Cat welfare and management, and (3) Cat behaviour.<sup>249</sup> The pet ownership course is unique to the choice of pet, and all potential buyers must complete a mandatory test and receive at least a 90% grade to pass, in order to own a pet. In Germany, to walk a dog without a leash and/or own a registered dangerous breed, owners must register with an accredited dog school and take a theory and practical test to get a dog handling licence.<sup>250</sup>
42. The Committee therefore recommends an update of the structured education for potential buyers to, first, include modules specific to the animal they intend to purchase and, for dogs, specific modules for dog breeds listed in the Second Schedule. Second, include a testing component to ensure that sufficient attention is given to the course and that information is properly retained before giving potential buyers the ability to purchase and care for an animal. Ideally, the course should cover the Five Domains of animal welfare and specific instruction on how to properly handle animals, especially for families with young children.
43. Currently, there are no specific guidelines for dog breeders to prepare potential buyers for a new dog. Many breeders have been reported to recommend that people “reserve” or buy the animals before sitting the course, because the course is “short and easy”. Most breeders also do not keep in contact or request updates on the dogs sold to ensure that new owners are properly handling their dogs. On the other hand, there are breeders who create WhatsApp group chats with all their past customers to receive regular updates on the dogs, and to serve as a 24-hour hotline that buyers can reach out to for help with handling and training their dog. This is in line with the best practices for dog breeders in Section D3(f) of the Code of Animal Welfare and shows that breeders are willing to accept some responsibility to educate buyers on animal care and handling.

<sup>247</sup> Centre for Urban Greenery and Ecology (CUGE). (n.d.). *Pet ownership course*. <http://go.gov.sg/petownershipcourse>

<sup>248</sup> Animal Welfare Victoria. (n.d.). *Responsible dog ownership course*. <https://agriculture.vic.gov.au/livestock-and-animals/animal-welfare-victoria/community-and-education/responsible-dog-ownership-course>

<sup>249</sup> Animal Welfare Victoria. (n.d.). *Responsible cat ownership course*. <https://agriculture.vic.gov.au/livestock-and-animals/animal-welfare-victoria/community-and-education/responsible-cat-ownership-course>

<sup>250</sup> Bouliane, N. (2024, April 19). *Having a dog in Berlin*. <https://allaboutberlin.com/guides/dog-ownership>

44. The Committee recommends that a clause be added to the Licensing Conditions for Dog Breeders Section 9 to mandate that breeders ensure minimally that buyers complete the pet ownership course before reserving or buying a dog, and direct new owners to supplementary resources on pet welfare and handling. The Code of Animal Welfare could also be amended to make it a minimum standard to provide information to owners on pet care and handling.

### **Proper disclosures by pet shops**

45. With reference to Fig. 5, pet shops report an alarming number of dog deaths, many of which are from long-term health conditions. With public awareness of animal welfare rising in recent years, pet shops have greater incentive to transparently report their source of dogs to interested consumers.
46. To ensure that pet shops can make an informed decision on the quality of dogs purchased from local breeding farms, and better inform buyers about the way that their dogs are raised, the Committee recommends that Section 19 of the Pet Shop Licensing Conditions<sup>251</sup> be amended so that documentary proof on the source of animals at the shop is displayed for consumers and AVS at all times. The Code of Animal Welfare Section B could also be amended to include disclosing the shop's source for each animal as a minimum standard.

### ***Recommendation 10 will provide greater clarity on best practices for breeding.***

47. Section 8 of the current licensing conditions for dog breeders currently covers (1) the housing conditions of breeding dogs and their litters, (2) the types of dogs who can and cannot be bred, and (3) the microchipping and DNA sampling of dogs. This section expands on current breeding regulations by recommending regulation on forced breeding and Artificial Insemination (AI) breeding and adding to the list of dogs who cannot be bred.

### **Regulating forced breeding in dogs**

48. While Clause 8.5 of the licensing conditions points towards one sign of forced breeding in dogs, the Committee considers the act of forcefully breeding dogs who are incompatible with each other, or unwilling to be mated, to be a cruel act. The current clause only prohibits the breeding of dogs who “minimally do not fight with each other” or show signs of fighting. However, the temperament of dogs might affect their willingness and ability to fight with each other, and any reactivity could be redirected to the human caregivers instead.
49. Forced breeding of dogs is an unnatural and dangerous process, both for the dogs and their human caregivers. It is not uncommon for a dam to attack a stud dog who is not of her choosing, even if she shows signs of oestrus such as lordosis and flagging. If the breeding pair is left unattended and forced to breed, heightened aggression from breeding bitches might cause injury to the stud dog and caregiver.<sup>252</sup>
50. Notwithstanding the potential dangers of forced breeding to dogs and human caregivers, forced breeding is also an act of animal cruelty, where “Any forced breeding prioritises the non-moral

<sup>251</sup> Animal & Veterinary Service, NParks. (2019, April 1). *Pet shop licence conditions (1). Display and sale of dogs and cats.* [https://www.nparks.gov.sg/avs/-/media/\(1\)-pet-shop-licensing-conditions-\(dogs-and-cats\)\\_avs.pdf](https://www.nparks.gov.sg/avs/-/media/(1)-pet-shop-licensing-conditions-(dogs-and-cats)_avs.pdf)

<sup>252</sup> National Research Council (US) Committee on Dogs. (1994). *Laboratory Animal Management: Dogs*. National Academies Press (US). <https://www.ncbi.nlm.nih.gov/books/NBK236596/>

desires of consumers and producers over the autonomy of the animals, and such practices would therefore approach inappropriate commodification.”<sup>253</sup>

51. Therefore, the Committee recommends that the Licensing Conditions for Dog Breeders include a new clause prohibiting forced breeding, even in cases where dogs do not fight with each other.

### Regulating breeding by Artificial Insemination (AI)

52. AI is a viable alternative to natural mating,<sup>254</sup> especially in crossbreeding dogs of different sizes or where there are signs of aggression between mating partners.
53. In recent years, AI has been adopted by dog breeders in Singapore.<sup>255</sup> This is because AI allows dog breeders to attain a desired sire from a different region, helping to diversify the gene pool of many breeds in Singapore.<sup>256</sup> AI also reduces the spread of diseases like Brucellosis, canine herpes virus, and canine transmissible venereal tumour.<sup>257</sup>
54. However, when incorrectly done, AI can pose a huge ethical concern for the welfare of animals involved.<sup>258</sup> The process can cause unnecessary physical and psychological trauma and lead to complications and infections. Surgical AI, as a result, is a high-risk procedure. Moreover, if record-keeping for frozen semen is inadequate, there is a risk that undesirable semen specimens are used for a long period, creating more genetic issues in the breeding pool for a prolonged time.<sup>259</sup>
55. Hence, there is a rising need for better regulation of the AI process in dogs, which is currently lacking in the Licensing Conditions for Dog Breeders. In line with this need, the Committee recommends an amendment to the licensing conditions Section 8 to include a subsection detailing the requirements for AI procedures. Requirements could include that of insemination through fresh, chilled, or frozen semen, under the instructions provided by laboratories, involvement with veterinary professionals, and according to international scientific and ethical guidelines. The guidelines should also include clear limits on the number of breeding cycles allowed through AI to prevent abuse of the system.
56. To supplement the recommendations on better mating practices, the Committee recommends that AVS consider adding regulations on neonatal care and pup whelping in the Licensing Conditions for Dog Breeders.

<sup>253</sup> Fulfer, K. & Clipsham, P. (2022). Are animals always commodified in the context of business? In N. Thomas (Ed.), *Animals and Business Ethics. The Palgrave Macmillan Animal Ethics Series*. [https://doi.org/10.1007/978-3-030-97142-7\\_2](https://doi.org/10.1007/978-3-030-97142-7_2)

<sup>254</sup> National Research Council (US) Committee on Dogs. (1994). *Laboratory Animal Management: Dogs*. National Academies Press (US). <https://www.ncbi.nlm.nih.gov/books/NBK236596/>

<sup>255</sup> Goh, L. (2023, December 20). *How much effort and money goes into breeding dogs ethically?* Kettle Labradors. <https://www.kettlelabradors.com/post/how-much-effort-and-money-goes-into-breeding-dogs-ethically>

<sup>256</sup> Vet Practice Singapore. (n.d.). *Artificial insemination in dogs*. Retrieved November 30, 2024, from <https://vetpractice.com.sg/resources/artificial-insemination-in-dogs/>

<sup>257</sup> Witter, L. (2022, January 31). *Should artificial insemination be used in dogs?* VetHelpDirect. <https://vethelpdirect.com/vetblog/2022/01/31/should-artificial-insemination-be-used-in-dogs/>

<sup>258</sup> RSPCA Australia. (2024, August 1). *What is the RSPCA's view on canine artificial insemination?* <https://kb.rspca.org.au/knowledge-base/what-is-the-rspcas-view-on-canine-artificial-insemination/>

<sup>259</sup> Witter, L. (2022, January 31). *Should artificial insemination be used in dogs?* VetHelpDirect. <https://vethelpdirect.com/vetblog/2022/01/31/should-artificial-insemination-be-used-in-dogs/>

## Updating the list of dogs who should not be bred

57. Clause 8.8(c) in the Licensing Conditions for Dog Breeders currently prohibits the breeding of dogs “that displays or has been diagnosed with a heritable condition or produce litters that show congenital defects. Some examples of harmful heritable conditions are Brachycephalic syndrome, epilepsy, degenerative myelopathy, hip dysplasia, and urinary bladder stones”. This suggests that the government acknowledges the ethical concerns of breeding dogs for traits that might diminish the dog’s quality of life.
58. However, while dogs with certain health conditions are barred from breeding programmes, dogs with the potential of developing these health conditions are still allowed to breed. For example, a dog above 12 months old and eligible for breeding might only show signs of degenerative myelopathy and epilepsy later in life, and a flat-faced breed of dog might not be brachycephalic but carry the genes for brachycephaly. The Committee recommends that the list of dogs prohibited from breeding programmes include dog breeds that are more prone to such health conditions. These include bulldogs, boxers, terriers, and pugs who are prone to brachycephaly.
59. Moreover, since 2023, there has been a rising demand for teacup-sized dogs (weighing under 1.8kg) in Singapore, mostly due to a rise in supply from Japan imports. This may stem from a misperception that miniaturised dogs are more suitable for families with young children and are easier to care for in smaller apartments. As a result, puppies tagged as “mini” or “teacup” have been selling faster and at a higher price compared to standard-sized dogs of the same breed.<sup>260</sup> There are at least two breeding farms at TAL reported to have sold dogs marketed as miniature or teacup dogs.
60. Teacup dogs are widely known to have a lower quality of life compared to their standard-sized counterparts. They suffer from bone fragility, stunted bone growth, and soft spots on the head.<sup>261</sup> Teacup dogs are also at higher risk of inherited diseases, and many people who purchase them might not have the adequate knowledge to care for such dogs with special needs.<sup>262</sup>
61. Given the demographic of Singaporeans interested in purchasing teacup dogs (i.e. families with young children, and people who find teacup dogs cuter for their size), there are ethical concerns, backed by research, that the sale of teacup dogs increases the risk of irresponsible pet purchases and pet-keeping, resulting in issues of pet abandonment and abuse in the long run.<sup>263</sup>
62. With the rate of animal cruelty and welfare cases rising by 79% in 2023, and with many of the reported cases involving pet abandonment,<sup>264</sup> there is a current and pressing need to address issues that might exacerbate irresponsible pet-keeping and pet purchases, such as the increased supply of teacup dogs on the market.

<sup>260</sup> Lee, C. M. (2023, November 22). *Smaller, 'cuter' dogs gain popularity in Singapore despite potential health risks*. Channel News Asia. <https://www.channelnewsasia.com/singapore/smaller-cuter-dogs-crossbreed-teacup-miniature-health-problems-singapore-3933596>

<sup>261</sup> Farrell, L. L., Schoenebeck, J. J., Wiener, P., Clements, D. N., & Summers, K. M. (2015). The challenges of pedigree dog health: approaches to combating inherited disease. *Canine Genetics and Epidemiology*, 2(3), 1–14. <https://doi.org/10.1186/s40575-015-0014-9>

<sup>262</sup> Krylova, K. (2024). Pets of precarity: The agency of excessively cutified companion animals. *Society & Animals*, 1–18. <https://doi.org/10.1163/15685306-bja10208>

<sup>263</sup> Ibid.

<sup>264</sup> SPCA Singapore. (2024, January 30). *SPCA Animal Cruelty and Welfare Report 2023: 2023 was not a good year for animals*. Facebook. <https://www.facebook.com/spcasingsapore/posts/-spca-animal-cruelty-and-welfare-report-2023-was-not-a-good-year-for-animals-a-s/692767936350839/>

63. Therefore, the Committee recommends that litter runts and dogs with bone fragility, dwarfism, stunted bone growth, or soft head spots be added to the list of dogs prohibited from breeding, under Clause 8.8(c) of the Licensing Conditions for Dog Breeders.
64. The Committee also recommends that Clause 8.8 of the Licensing Conditions for Dog Breeders prohibit the use of dogs who show signs of aggression and reactivity for breeding. The best practice of breeding dogs with a balanced temperament could be converted to a minimum standard in Section D3 of the Code of Animal Welfare (for the pet industry).<sup>265</sup>
65. In a recent inspection that AVS conducted on the 22 dog farms in Singapore using canine DNA test kits, AVS flagged four farms for keeping inaccurate breeding records.
66. To ensure that the dog's progeny and genetics are well-documented and of high quality, the Committee recommends that Clause 8.11 be amended to mandate that all dogs be sent for genetic testing before being bred, and for the DNA information to be recorded for bookkeeping and inspections.

***Recommendation 10 will upskill the competencies of pet breeders and improve bookkeeping in breeding facilities.***

#### **Updating mandatory courses for pet breeders**

67. Pet breeders are currently expected to pass a mandatory "Pet Care and Management Course" and receive a certificate in order to operate a pet business.<sup>266</sup> The 2.5-day course offered by Temasek Polytechnic includes lectures on the Animals and Birds Act, animal housing, nutrition, communication and behaviour, grooming, physiology, health and diseases, occupational health and safety, and client education. It also includes workshops on animal handling and parasitology. The current list of modules in the mandatory course covers a diverse range of issues that supplement the recommendations made in this White Paper.
68. However, breeders have given feedback that the course materials are outdated. There is also currently no lecture or workshop on best breeding practices. The Committee believes that a breeder should undergo a mandatory course on breeding practices before being certified to operate a breeding business. This suggestion is in line with findings from a public consultation with breeders, who wish to see more updated and relevant course materials. In its current state, the course cannot help breeders attain adequate knowledge about good breed standards (the desired characteristics of the breed such as size, proportion, coat, colour, and temperament) and breed-specific genetic problems, a minimum standard mentioned in Section D2.7 of the Code of Animal Welfare (for the pet industry).<sup>267</sup>
69. The Committee recommends that new lectures and workshops be added to the Pet Care and Management course for pet breeders, on issues specific to breeding animals. This includes but is

<sup>265</sup> Animal & Veterinary Service (formerly Agri-Food & Veterinary Authority of Singapore). (2016). *Code of Animal Welfare (for the pet industry)*. [https://www.nparks.gov.sg/avs/-/media/avs\\_caw-pet-industry-full-\(eng\).pdf](https://www.nparks.gov.sg/avs/-/media/avs_caw-pet-industry-full-(eng).pdf)

<sup>266</sup> Temasek Polytechnic. (n.d.). *Pet care and management (companion animals)*. <https://www.tp.edu.sg/schools-and-courses/adult-learners/all-courses/short-courses/exe-petcare-lecture-workshop.html>

<sup>267</sup> Animal & Veterinary Service (formerly Agri-Food & Veterinary Authority of Singapore). (2016). *Code of Animal Welfare (for the pet industry)*. [https://www.nparks.gov.sg/avs/-/media/avs\\_caw-pet-industry-full-\(eng\).pdf](https://www.nparks.gov.sg/avs/-/media/avs_caw-pet-industry-full-(eng).pdf)



not limited to courses on selecting the right animal for breeding programmes, how to do genetic testing and appropriate record-keeping during the breeding process, how to care for animals during breeding and after, and modules emphasising the Five Domains of animal welfare. This module can be made open to pet breeders only and appended on top of the current curriculum.

70. The Committee also recommends that Section 5 of the Licensing Conditions for Dog Breeders be amended to mandate having at least one certified personnel on the breeding premises at all times, to ensure that bookkeeping, breeding, and animal handling are done according to the standards taught in the mandatory course.

### **Better bookkeeping through the use of CCTV**

71. The Licensing Conditions for Dog Breeders currently require dog breeders to keep full and complete records of the breeding animals and puppies on the farm, under Section 6. This includes records of death on the premises, information on breeding dogs and puppies, microchip numbers, movement of the dogs, and a visitor and personnel register.
72. However, in a recent inspection conducted by AVS in 2024, 19 of 22 licensed dog breeders were found to have breached their licensing conditions, majority of which was due to improper record-keeping.<sup>268</sup> An AVS spokesperson mentioned that many dogs are “removed” from the records when they die, are rehomed, or retired.<sup>269</sup> Current measures to enforce proper bookkeeping have failed to ensure that the majority of breeding facilities comply with the tightened regulations.
73. The Committee recommends that AVS mandate the installation of CCTV cameras in breeding facilities and outside, to be made available to AVS upon request. This better ensures that written and electronic records align with video footage and allows AVS inspections to happen more conveniently and remotely.

### **Conclusions on Recommendation 10**

74. In summary, Recommendation 10 proposes a wholesale reappraisal of the Licensing Conditions for Dog Breeders to ensure that Singapore’s welfare laws on dog breeding meet international precedence and anticipate local trends in the animal industry.
75. Through a holistic review of the current breeding conditions, Singapore can establish a framework that ensures animals receive proper care and breeders meet stricter compliance standards. This would create a foundation for Recommendation 10 to enhance enforcement mechanisms on breeding farms effectively. In doing so, Recommendation 10 also seeks to close existing gaps in regulatory measures, adapting to changes in the pet industry.

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<sup>268</sup> Tan, A. & Tan, J. (2024, June 18). *19 of 22 licensed dog breeders in Singapore found to have breached tightened rules*. The Straits Times. <https://str.sg/74jr>

<sup>269</sup> Ibid.

**Recommendation 11:**

**Impose a minimum age requirement of 16 years old to purchase all pets**

1. The Committee recommends extending the existing age restriction of 16 years and the conditions of sale (including pre-purchase declarations and screening processes for purchasing dogs, cats, and rabbits) to cover all legal pet species. This includes but is not limited to birds, chinchillas, fish, guinea pigs, hamsters, gerbils, mice, red-eared sliders, and other approved pets.
2. The current guidelines established by the Animal & Veterinary Service (AVS) stipulate that pet shops are prohibited from selling dogs, cats, and rabbits to individuals under the age of 16. Additionally, pet shops are required to complete a Pet Purchase Declaration (PPD) form<sup>270</sup> to ensure responsible pet ownership before finalising any sales of these animals.
3. However, this rule does not apply to the sale of all other animals, such as hamsters, guinea pigs, birds, or terrapins.
4. The Committee further suggests that pet retailers must ensure thorough screening processes and provide comprehensive species-specific pet care instructions to a potential buyer.

***Introduction to Recommendation 11***

5. In 2014, new licensing conditions<sup>271</sup> were introduced to prohibit the sale of certain species of pets (cats, dogs, and rabbits) to anyone under the age of 16, unless accompanied by a parent or guardian. Additionally, these conditions require pet retailers to conduct mandatory pre-sale screenings for all potential buyers. These conditions were implemented to ensure animal welfare and promote responsible pet ownership.
6. In 2016, it was reported that the 2013 regulations led to a 10% decrease in pet shop sales, reducing impulsive purchases.<sup>272</sup>

***Concerning rates of small animal neglect/abandonment warrant a more consistent approach.***

7. In its 2023 Animal Cruelty and Welfare Report, the SPCA highlighted that small animals — including rabbits, hamsters, guinea pigs, terrapins, and birds — accounted for nearly half of all pet abandonment cases.<sup>273</sup> Hamsters alone represented 27% of the abandoned animals, making them the second most commonly abandoned pets after cats.
8. Other animal welfare groups (AWGs) have also noted consistently high numbers of small animals being abandoned, surrendered, or rescued, as shown in Table 3:

<sup>270</sup> Animal & Veterinary Service, NParks. (2019, April 1). *Pet purchase declaration*. [https://www.nparks.gov.sg/-/media/avs/resources/pet-shop/pet-purchase-declaration-form\\_avs.pdf](https://www.nparks.gov.sg/-/media/avs/resources/pet-shop/pet-purchase-declaration-form_avs.pdf)

<sup>271</sup> Agri-Food & Veterinary Authority of Singapore. (2014). *AVA annual report 2013/2014: Think fresh*. <https://www.sfa.gov.sg/docs/default-source/publication/annual-report/avaar20132014thinkfresh.pdf>

<sup>272</sup> Lim, J. (2015, June 8). *Impulse buys of pets down with new pre-screening rules*. The Straits Times. <https://str.sg/3PPB>

<sup>273</sup> SPCA Singapore. (2024, January 30). *SPCA Animal Cruelty and Welfare Report 2023: 2023 was not a good year for animals*. Facebook. <https://www.facebook.com/spcasingapore/posts/-spca-animal-cruelty-and-welfare-report-2023-was-not-a-good-year-for-animals-a-s/692767936350839/>

AWG	2021	2022	2023
SPCA	110	90	147
ACRES	136	134	137
Guinea Pig Rescue Singapore	221	172	~208–260

**Table 3:** Number of small animals (excluding rabbits) abandoned, surrendered, and/or rescued. Data retrieved from internal case files of the SPCA, ACRES, and Guinea Pig Rescue Singapore.

9. Although the minimum age and pre-purchase screening regulations have not yet been extended to other pet species, it may now be timely to consider a broader application of these measures to better protect vulnerable small animals.

***Recommendation 11 will deter the abandonment and neglect of small animals by ensuring that potential pet owners are better informed and prepared.***

10. Due to their size and physiological characteristics, most small animals cannot be easily microchipped. This limits the ability to trace their owners and reduces accountability in abandonment cases.
11. Additionally, these animals are often difficult to sterilise. Given that many small animals are prolific breeders, there is a high risk of accidental breeding when they are improperly kept in pairs or groups. This leads to a higher probability of abandonment or neglect as the resources required for proper pet care become unmanageable.
12. Small animals are typically bred in captivity to be sold as pets. Many of them fall in the category of prey species and, as a result, their probability of survival when abandoned is exceedingly low.
13. In cases where terrapins are neglected or abandoned, the situation becomes especially critical as most animal shelters in Singapore are not equipped to accommodate this species. Without the availability of a suitable rehomer, and in instances where the owner remains uncooperative or fails to follow professional guidance, terrapins are often left to live out their lives in persistent conditions of neglect or are illegally released into reservoirs or other water bodies where they are at risk of traumatic injuries, even death.
14. Several news reports have covered the poor welfare of small animals kept in improper conditions:
  - a. In October 2020, the Hamster Society Singapore (HSS) rescued 129 hamsters from a pet hoarding case. The hamsters were surrendered by an owner who lacked knowledge about proper hamster care. Due to the lack of proper care and separation, many of the hamsters were sick or had just given birth.<sup>274</sup>
  - b. In June 2022, a severe case of hamster neglect was discovered in Hougang. Several hamsters were left for days without food or water. Dead and rotting hamsters were found caged alongside living ones. HSS volunteers reported finding maggot-filled carcasses and remains, with some

<sup>274</sup> Ishak, S. (2020, October 17). 129 hamsters in S'pore surrendered in pet hoarding case, most lack proper care & separation. Mothership. <https://mothership.sg/2020/10/129-hamsters-abandoned-hoarding/>

hamsters resorting to cannibalism. The extreme heat exacerbated the suffering of the animals, who lacked access to clean drinking water. The case was reported to the authorities, and the surviving hamsters were taken to a vet before being placed in foster homes.<sup>275</sup>

- c. On 9 February 2023, 15 guinea pigs were discovered abandoned in two thermal food delivery bags along Sungei Tengah Road.<sup>276</sup> Upon arrival, the SPCA officers found the guinea pigs drenched from the rain and suffering in the heat, with one already deceased. The surviving guinea pigs were taken to the SPCA's Community Animal Clinic for medical care. Although the case was reported to the authorities, there was insufficient evidence to identify the culprit.
  - d. On 12 March 2024, the SPCA responded to a hoarding case at a MacPherson flat where they found 51 Syrian hamsters, many housed in overcrowded and poor conditions leading to injuries among the animals. Of the 51 hamsters, 48 were rescued, with 24 requiring immediate medical attention. In addition to the hamsters, the SPCA observed several terrapins in the same household. However, the SPCA and other animal welfare groups were unable to rescue the terrapins due to a lack of appropriate housing facilities for them.<sup>277</sup>
  - e. On 13 May 2024, in an article discussing the deteriorating conditions at Punggol Point Park,<sup>278</sup> the Herpetological Society highlighted that the large population of terrapins, likely abandoned by their owners, was responsible for the pond's turbidity and foul odour.
  - f. At least 20 abandoned hamsters were found drenched and huddling under a shrub in Bedok Town Park on 18 June 2024. HSS was alerted by a member of the public at around 4:30pm and responded quickly to rescue the animals. The hamsters, including 10 babies measuring just 2 cm long, were found without food or shelter and some were injured. Witnesses reported that the hamsters had been dumped over two days.
15. Implementing mandatory pet purchase declarations and conducting thorough screenings of potential pet owners, coupled with providing education at the point of sale, will enable pet retailers to correct the misconception that these small animals are easy to care for.
  16. This will also help better prepare potential pet owners for the responsibilities and commitment involved.
  17. Several countries and states worldwide have enacted provisions to promote responsible pet ownership, including minimum age requirements for pet purchases.
  18. For example, the United Kingdom's Animal Welfare Act 2006<sup>279</sup> prohibits the sale of animals to individuals under 16 years old and mandates pre-purchase counselling by pet shops to ensure prospective buyers understand the responsibilities of pet care.

<sup>275</sup> Tan, A. (2022, June 5). *Neglected hamsters found with dead & rotting cagemates at common area of Hougang block*. Mothership. <https://mothership.sg/2022/06/hamsters-neglected-hougang-common-area/>

<sup>276</sup> Samsuri, S. (2023, March 14). *15 guinea pigs found abandoned in food delivery bags*. Channel News Asia. <https://www.channelnewsasia.com/singapore/spca-guinea-pigs-abandoned-food-delivery-bags-3343841>

<sup>277</sup> Tan, A. (2024, March 13). *SPCA rescues 48 hamsters from hoarder at MacPherson, now looking for fosterers*. Mothership. <https://mothership.sg/2024/03/spca-rescues-48-hamsters/>

<sup>278</sup> The New Paper. (2024, May 13). *Terrapin abandonment plagues Punggol Point Park*. <https://tnp.straitstimes.com/news/singapore/terrapien-abandonment-plagues-punggol-point-park>

<sup>279</sup> Animal Welfare Act 2006 (UK). <https://www.legislation.gov.uk/ukpga/2006/45/section/11> (Section 11).

19. Similarly, Germany's Animal Welfare Act<sup>280</sup> prohibits the sale of vertebrates to minors under 16 without parental consent.
20. In Taiwan, while there is no specific minimum age for purchasing pets, the Animal Protection Act<sup>281</sup> stipulates that ownership of a pet bought by a minor automatically transfers to the legal guardian, recognising the limited capacity of children to care for animals responsibly.

***Recommendation 11 will minimise impulse purchases of pets.***

21. Many small animals are sold at low prices, making them easily accessible for purchase, even by children, without necessitating parental permission. For example, the average cost of a red-eared terrapin ranges from S\$2 to S\$6, while the price of a hamster can vary from S\$5 to S\$250 depending on the breed.
22. These low costs may also contribute to the misconception that these animals have less value, leading to a reduced sense of responsibility for their care.
23. This accessibility is further exacerbated by the popularity of small animals among young children. Pet retailers often strategically market the appealing qualities of these animals to attract children and young families, along with aesthetically pleasing — and sometimes even hazardous — pet accessories, such as colourful cages and exercise balls.<sup>282</sup>
24. Additionally, preschool institutions often use animals like terrapins and hamsters to teach values of responsibility and compassion. While these lessons are valuable, they inadvertently create an interest and demand for these animals amongst young children.
25. Children may in turn persuade their parents to purchase these animals for them and, in some cases, without proper screening processes in place, they might even buy the animals without their parents' permission.
26. The likelihood of impulsive purchases is higher among children and adolescents than adults. Given that their prefrontal cortexes are still developing during adolescence, children and teenagers may struggle with making sound decisions regarding long-term commitments such as pet ownership.<sup>283</sup> Even if the pets are purchased with a parent's involvement, there is a high risk that the child may quickly lose interest in the animal.<sup>284</sup>
27. Children are also significantly influenced by popular cartoons that anthropomorphise small animals. This may lead to misconceptions about the specialised care these animals require. Anecdotal evidence from the SPCA's polls conducted during educational visits to their shelter revealed that

<sup>280</sup> Michigan State University. Animal Legal & Historical Center. (2010, October). *Animal Welfare Act (Germany)*. *Federal Law Gazette I*, p. 1094. <https://www.animallaw.info/statute/germany-cruelty-german-animal-welfare-act>

<sup>281</sup> Laws & Regulations Database of The Republic of China (Taiwan). (2021, May 19). *Animal Protection Act*. <https://law.moj.gov.tw/ENG/LawClass/LawAll.aspx?pcode=M0060027>

<sup>282</sup> Ontario Hamster Club. (n.d.). *Make PetSmart develop humane, safe cages for small animals*. Change.org. Retrieved September 3, 2024, from <https://www.change.org/p/petsmart-make-petsmart-develop-humane-safe-cages-for-small-animals>

<sup>283</sup> National Institute of Mental Health. (2023). *The teen brain: 7 things to know*. <https://www.nimh.nih.gov/health/publications/the-teen-brain-7-things-to-know>

<sup>284</sup> Birbili, M. & Tsitouridou, M. (2008). *Identifying children's interests and planning learning experiences: Challenging some taken-for-granted views*. In P. G. Grotewell & Y. R. Burton (Eds.), *Early Childhood Education: Issues and Developments* (pp. 143–156). Nova Science Publishers, Inc.

many primary school children mistakenly believe rabbits eat primarily carrots (like Bugs Bunny) and that terrapins will remain small throughout their lives, when in fact terrapins can grow to the size of a dinner plate and live up to 30 years.

28. AWGs and independent rehomingers in Singapore already implement a comprehensive adoption counselling process for all pet species. While this system does not completely eradicate the risk of abandonment or neglect, due diligence is exercised to ensure that all essential information is communicated to the adopter.
29. Furthermore, the processes in place ensure that children are never the sole guardians of pet animals and generally guards against rehoming pets to families who may be motivated solely by the desire to appease their children. Pet retailers should be held to similar standards of accountability.

***Recommendation 11 will safeguard the vulnerability of small animals.***

30. Due to their size, many small animals are particularly vulnerable to injury and trauma from improper handling.
31. The cerebellum, a key region of the hindbrain responsible for motor skill performance in humans, undergoes significant development and reaches its peak only between the ages of 12 (in females) and 16 years (in males).<sup>285</sup>
32. As a result, younger children, who are still developing these motor skills, may struggle with the safe handling of small animals. This increases their likelihood of accidents or mishandling, particularly when unsupervised by adults.
33. Specific handling risks are associated with different species, but in all instances the risk is heightened when they are cared for by young children, who may have less developed coordination and motor control:
  - a. Rats and mice are prone to degloving injuries if they are improperly grasped by their tails. The tail's skin can be pulled off, leaving the bone and tissues exposed, which is extremely painful and often requires immediate medical attention.<sup>286</sup>
  - b. Hamsters and guinea pigs are prone to traumatic injuries.<sup>287</sup> Squeezing them too tightly, rough handling, or accidentally dropping them could lead to broken bones or suffocation. Additionally, the unpredictable movements of children may cause the animals to panic, increasing the likelihood of wriggling free and falling which could result in fractures. The stress induced by such handling can also lead to health problems in hamsters and guinea pigs, such as wet tail, a potentially fatal condition.

<sup>285</sup> Tiemeier, H., Lenroot, R. K., Greenstein, D. K., Tran, L., Pierson, R., & Giedd, J. N. (2010). Cerebellum development during childhood and adolescence: A longitudinal morphometric MRI study. *NeuroImage*, 49(1), 63–70. <https://doi.org/10.1016/j.neuroimage.2009.08.016>

<sup>286</sup> Mitchell, M. A. & Tully, T. N. (Eds.). (2009). *Manual of exotic pet practice*. W.B. Saunders.

<sup>287</sup> O'Neill, D. G., Kim, K., Brodbelt, D. C., Church, D. B., Pegram, C., & Baldrey, V. (2022). Demography, disorders and mortality of pet hamsters under primary veterinary care in the United Kingdom in 2016. *Journal of Small Animal Practice*, 63(10), 747–755. <https://doi.org/10.1111/jsap.13527>



- c. Terrapins may suffer internal injuries, shell damage, or fractures if accidentally dropped. Terrapins are also prone to being mishandled in ways that can disrupt their natural behaviour, leading to stress. For example, excessive handling or rough play can cause a terrapin to become frightened or aggressive, which might lead to biting — a natural defensive behaviour that can harm both the child and the terrapin. Furthermore, there is the risk of children not maintaining proper hygiene after handling terrapins, which can expose them to potential bacterial infections such as Salmonella.
34. Some small animals such as rodents and rabbits are adept at concealing pain and discomfort, making it challenging even in a clinical setting to assess their wellbeing.<sup>288</sup> Behavioural changes in appetite or faecal output are commonly used to gauge pain and illness, but these changes are often subtle and may include unusual behaviours like bruxism (teeth grinding). Recognising these signs requires attentiveness and a level of perceptiveness that comes with age-related maturity.
35. Consequently, the natural instinct of these animals to hide their pain can make it more difficult for children and even adults who have not been provided the requisite knowledge to detect signs of illness in their pets.
36. These animals also require specific care considerations that differ from what is necessary for other species<sup>289</sup> such as cats and dogs. For instance, hamsters' teeth grow continuously, particularly their incisors, requiring the provision of appropriate chew items and regular dental care to prevent dental disease and abscesses.
37. Due to these unique needs, along with relatively low physical strength and dexterity and a reduced tendency to vocalise compared to cats and dogs, these animals are particularly vulnerable to lapses in care when their owners are not adequately empowered to care for them.

***Recommendation 11 will ensure that pet owners possess the necessary capacity to adequately care for a sentient being.***

38. According to Piaget's Stages of Cognitive Development,<sup>290</sup> cognition advances through four distinct stages in humans. It is only during the third stage, concrete operations (typically from ages 6 to 12), that children are learning to consider others' perspectives and develop empathy. Children at this stage still require direct, tangible experiences to understand abstract concepts.
39. As children of these ages are still developing empathy, their ability to understand complex emotional or physical states may be limited. If a pet's illness or discomfort is not immediately observable or if the child lacks prior experience with sick animals, they may struggle to recognise that the pet requires medical attention.
40. Laws in Singapore acknowledge that cognitive capacity in minors is limited, and several non-animal related laws already reflect this.

<sup>288</sup> Benato, L., Rooney, N. J., & Murrell, J.C. (2019). Pain and analgesia in pet rabbits within the veterinary environment: A review. *Vet Anaesthesia and Analgesia*, 46(2), 151–162. <https://doi.org/10.1016/j.vaa.2018.10.007>

<sup>289</sup> Pellett, S. & Mancinelli, E. (2017). Veterinary care of hamsters. Part 1: Husbandry and emergency care. *Companion Animal*, 22(11), 684–689. <http://dx.doi.org/10.12968/coan.2017.22.11.684>

<sup>290</sup> Piaget, J. (1971). The theory of stages in cognitive development. In D. R. Green, M. P. Ford, & G. B. Flamer (Eds.), *Measurement and Piaget* (pp. 1–11). McGraw-Hill.

41. For example, Section 35(1) of the Civil Law Act 1909<sup>291</sup> outlines the legal capacities and responsibilities of individuals under the age of 18, detailing the circumstances under which minors can enter into contracts and assume legal obligations.
42. The Mental Capacity Act 2008 recognises that individuals under the age of 21 may lack the capacity to fully comprehend information relevant to decision-making.
43. Purchasing a pet involves a significant commitment and legal responsibility, including the obligation to provide appropriate care, medical attention, and welfare in accordance with the Five Domains for the animal throughout life.
44. Individuals under the age of 16 may not possess the full capacity to comprehend the long-term responsibilities associated with pet ownership. Therefore, it is important to ensure that those who enter into social contracts for the acquisition of pets are sufficiently mature to understand and manage their obligations.
45. There are several case studies which demonstrate that young persons may not possess sufficient capacity to understand pain in animals or adequately care for them independently:
  - a. Panther was a community cat thrown from height by a young boy. The child in question was subjected to a discretionary programme by the AVS. During this programme, the boy expressed remorse, and it became evident to the officers that his actions were driven by curiosity and a lack of understanding of the pain inflicted on the animal.<sup>292</sup>
  - b. A primary school student was recorded on camera carrying a rabbit by the ears and handling the rabbit roughly. Upon investigation by the SPCA's inspectors, it was clear that the child did not understand the fragility of rabbits and the potential harm her actions could have caused.<sup>293</sup>
  - c. A student posted a TikTok video showing her repeatedly placing her pet cat on a ledge, unaware of the proper measures needed to ensure the cat's safety. After the SPCA intervened, the student's parents took corrective action by installing mesh on their windows to protect the cat.<sup>294</sup>
46. Children should be protected from responsibilities they are not yet equipped to handle, including the care of a pet. This is akin to restricting young children from consuming alcohol or cigarettes, as both involve long-term impacts that require a level of maturity and understanding that children have not yet developed. It will also prevent potential harm both to themselves and to the animals under their care.

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<sup>291</sup> Civil Law Act 1909 (2020 Revised Edition). <https://sso.agc.gov.sg/Act/CLA1909>

<sup>292</sup> Tang, L. (2023, July 28). *Boy who threw cat off HDB block issued stern warning after completing diversionary programme: AVS. TODAY.* <https://www.todayonline.com/singapore/boy-who-threw-cat-hdb-block-issued-stern-warning-after-completing-diversionary-programme-avs-2221496>

<sup>293</sup> From the SPCA Singapore's internal case files.

<sup>294</sup> From the SPCA Singapore's internal case files.

***Conclusion on Recommendation 11***

47. The differences in age restrictions for the purchase of dogs, cats, and rabbits as compared to other small animals might create a misleading impression that some animals are suitable for young children to purchase.
48. There are currently no safeguards in place to ensure that these small animals — usually offered at lower prices — are sold to responsible owners.
49. Combined with the challenges of sterilising or microchipping smaller animals, this means that they are exposed to significantly higher risks of being neglected or abandoned.
50. All animals deserve equal protection, and the same level of safeguards should be extended to all species. Standardising pet sale conditions can contribute to improved animal welfare and promote more consistent and responsible pet care practices.

**Recommendation 12:**

**Introduce more detailed guidance and safeguards for the euthanasia of healthy pets**

1. The Committee recommends amending the Code of Ethics for Veterinarians (“**Code of Ethics**”) to include more detailed guidance on the euthanasia of healthy pets, including requiring pet owners to declare what alternatives to euthanasia (such as rehoming and retraining) were attempted. The Code of Animal Welfare (for pet owners) should also be amended to introduce additional safeguards for pet owners seeking to euthanise their pets.

***Introduction to Recommendation 12***

2. The Code of Ethics<sup>295</sup> currently states under paragraph 14:  
  
“14.1 Humane euthanasia of animals is an ethical veterinary procedure. A veterinarian must consider the euthanasia of an animal to prevent unnecessary suffering, but prior to this, treatment options must be considered, as appropriate. Informed consent for euthanasia should be obtained in writing as far as possible.  
  
14.2 A veterinarian is entitled to refuse a request for euthanasia if he does not deem it necessary. A veterinarian whose recommendation of euthanasia is not accepted by the client is entitled to terminate the VCPR.”  
  
3. All veterinarians in Singapore must comply with the Code of Ethics, and failure to comply with the Code of Ethics can result in professional discipline for the veterinarian.  
  
4. The Minister for National Development has also restated in response to a parliamentary question on 5 June 2020 that the Code of Ethics requires all veterinarians to take into account public safety and animal welfare in deciding on the course of treatment for an animal, and that veterinarians must consider other treatment options prior to considering euthanasia.  
  
5. The Minister further stated that the Ministry will consider whether it should be compulsory for people seeking to euthanise their healthy dog or cat to produce documented proof that they have attempted to rehome the animal, or certification from an Animal & Veterinary Service-accredited trainer that the animal, if aggressive, is untrainable. The Minister also stated that the Ministry will consider whether it should be made compulsory for veterinarians to wait for a pre-determined length of time before euthanising the animal, during which the animal's details are published on websites of NParks and animal welfare groups to facilitate rehoming.  
  
6. It was stated that NParks will continue to work with the Singapore Veterinary Association on these matters and ensure that the Code of Ethics remains up to date with developments in the veterinary industry and international best practices.  
  
7. In October 2023, the Ministry of National Development announced that a council that aims to raise professional standards and practices in the veterinary sector will be established by 2025.

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<sup>295</sup> Singapore Veterinary Association. (2012, February 1). *Code of ethics for veterinarians*. [https://sva.org.sg/wp-content/uploads/2018/10/Code\\_of\\_Ethics\\_for\\_Vets.pdf](https://sva.org.sg/wp-content/uploads/2018/10/Code_of_Ethics_for_Vets.pdf)

8. However, the Code of Ethics has not been amended and there remains insufficient guidance on the circumstances under which physically healthy animals can be euthanised. While the Code of Ethics provides that euthanasia of an animal can be considered to prevent unnecessary suffering, it is silent on euthanasia in other circumstances, such as euthanasia of a physically healthy animal with aggression/behavioural issues. It is proposed that the Code of Ethics be amended to incorporate the following recommendations, in conjunction with the introduction of the council to oversee the veterinary sector. The Code for pet owners<sup>296</sup> should also be amended to introduce additional safeguards where pet owners seek to euthanise their physically healthy pets.

***Recommendation 12 will strengthen safeguards for pet owners seeking to euthanise their physically healthy pets.***

9. The Code for pet owners should require all pet owners to use best efforts to retrain or rehome their physically healthy pets before resorting to euthanasia. Pet owners who seek to euthanise their physically healthy pets must provide:
  - a. Evidence that the pet has been assessed by an AVS-accredited trainer and has been certified to be untrainable
  - b. Evidence that the owner has attempted to rehome the pet. This may include contacting animal welfare groups, independent rescuers, and other potential adopters, such as through online adoption forums.

***Recommendation 12 will provide veterinarians more guidance in responding to requests from pet owners seeking to euthanise their physically healthy pets.***

10. The Code of Ethics should be amended to include more safeguards and protocols, so as to ensure that euthanasia is a last resort for physically healthy pets with aggression/behavioural issues.
11. The Code of Ethics should require a veterinarian to take the following steps in relation to a euthanasia request for a physically healthy animal:
  - a. Request that the pet owner set out their reasons for euthanasia
  - b. Determine, during history taking, the origins of the pet and if an adoption agreement exists
  - c. Carry out and document his/her independent assessment of the pet's mental and physical wellness, and whether euthanasia is warranted to prevent unnecessary suffering
  - d. Request evidence that the pet has been assessed by an AVS-accredited trainer to be untrainable, as well as evidence that the owner has attempted to rehome the pet
  - e. If the evidence in (d) is unavailable, i.e. the owner has failed to satisfactorily establish that the pet has been assessed by an AVS-accredited trainer to be untrainable or that the owner has failed to rehome the pet despite best efforts, the veterinarian must do the following:

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<sup>296</sup> Animal & Veterinary Service (formerly Agri-Food & Veterinary Authority of Singapore). (2017). *Code of Animal Welfare (for pet owners)*. [https://www.nparks.gov.sg/avs/-/media/avs\\_caw\\_booklet-\(eng\).pdf](https://www.nparks.gov.sg/avs/-/media/avs_caw_booklet-(eng).pdf)

- i. If the pet was adopted from an AWG or independent rescuer, the veterinarian should reach out to the relevant AWG or independent rescuer. The pet will be removed from the pet owner, and the AWG or independent rescuer will take the necessary steps to assess the pet's behaviour to determine whether they are untrainable.
  - ii. If the pet was not adopted from an AWG or independent rescuer (for example, if the dog was purchased from a pet shop), the veterinarian should still contact AWGs or independent rescuers to check if any group is able to shelter the pet.
- f. If no AWG or independent rescuer is able to provide shelter to the pet and if the vet's assessment is that euthanasia is warranted to prevent unnecessary suffering, the euthanasia of the pet can proceed.
- g. If the pet owner is able to provide documented proof as set out in (d), and if the vet's assessment is that euthanasia is warranted to prevent unnecessary suffering, the euthanasia of the pet can proceed.

### **Conclusion on Recommendation 12**

12. Recommendation 12 will strengthen safeguards to prevent the unnecessary euthanasia of physically healthy pets. Importantly, it will also protect pet owners and veterinarians by ensuring that there is a paper trail of efforts and decisions made.
13. The euthanasia of Tammy<sup>297</sup> (a healthy seven-month-old puppy) in 2013 and of Loki<sup>298</sup> (a healthy dog turning three years old) in 2020 caused significant public outcry. The incidents led to public attention on the individuals and groups involved in the euthanasia, including the owners and the veterinarians. Both cases also led to threats of civil lawsuits.
14. Recommendation 12 may have prevented Tammy and Loki's euthanasia in the first place. Even if euthanasia was determined to be essential to prevent unnecessary suffering, Recommendation 12 would have ensured that owners and veterinarians who made best efforts and acted in good faith were protected by following a robust process before resorting to euthanasia.

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<sup>297</sup> Woo, S. B. (2014, February 16). *Euthanised puppy dispute: Parties involved have reached a settlement*. TODAY. <https://www.todayonline.com/singapore/euthanised-puppy-dispute-parties-involved-have-reached-settlement>

<sup>298</sup> Ng, M. (2020, September 15). *No breach by owners, vets who euthanised Loki the dog; no further action to be taken: AVS*. The Straits Times. <https://str.sg/JXG5>



**Recommendation 13:**

**Broaden the scope of the Code of Animal Welfare (for pet owners)**

1. The Committee recommends broadening the scope of the Code of Animal Welfare (for pet owners) to clearly distinguish between best practices and minimum standards.
2. Additionally, the Committee suggests setting higher standards of care when outlining best practices, encouraging pet owners to go beyond the minimum requirements to provide a more optimal environment for their pets.
3. This will allow the Code of Animal Welfare (for pet owners) to provide clearer guidance to pet owners and ensure better animal welfare.

***Introduction to Recommendation 13***

4. The Code of Animal Welfare (for pet owners),<sup>299</sup> herein referred to as the “**Code**”, was introduced in October 2016 with the intent to provide minimum standards for animal housing, pet care, and management.
5. The Code aims to educate pet owners on responsible pet ownership and duty of care to the animal. While not legally enforceable, failure to meet the minimum standards set out in this Code may be used as evidence of:
  - a. Failure to comply with one’s duty of care towards an animal
  - b. Animal cruelty
  - c. Any other offence committed under the Animals and Birds Act
6. Despite the presence of a Code of Animal Welfare, the SPCA continues to encounter numerous cases of pets living in compromised welfare situations. In 2023, 61.2% of the animal cruelty complaints received by the organisation were linked to poor welfare and neglect.<sup>300</sup>
7. Specifically, the SPCA documented 142 cases of caging and tethering pets that year and, alarmingly, 80 similar cases were reported in just the first half of 2024.
8. Revising the Code to offer clearer, more detailed guidelines and broadening its scope could help prevent pet neglect and ensure that pet owners effectively understand and implement good animal welfare standards.
9. As animals are sentient beings, their welfare involves more than just the absence of suffering — it also requires that they flourish. Therefore, responsible pet ownership should focus on both protecting them from unnecessary harm and ensuring that their needs are comprehensively met.

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<sup>299</sup> Animal & Veterinary Service, NParks. (n.d.). *Code of Animal Welfare (for pet owners)*. Retrieved September 6, 2024, from [https://www.nparks.gov.sg/avs/-/media/avs\\_caw-pet-owners\\_infographic-eng.pdf](https://www.nparks.gov.sg/avs/-/media/avs_caw-pet-owners_infographic-eng.pdf)

<sup>300</sup> SPCA Singapore. (2024, January 30). *SPCA Animal Cruelty and Welfare Report 2023: 2023 was not a good year for animals*. Facebook. <https://www.facebook.com/spcasingapore/posts/-spca-animal-cruelty-and-welfare-report-2023-was-not-a-good-year-for-animals-a-s/692767936350839/>

To achieve this, the Five Domains model<sup>301</sup> is widely used internationally. This model focuses on key aspects of wellbeing such as nutrition, environment, health, behaviour, and mental state.

10. The Code should be grounded in this model to ensure a comprehensive approach to the care and wellbeing of all animals.
11. It is further proposed that the Code be regularly updated (every three years) in consultation with AWGs to incorporate the latest best practices and reflect evolving attitudes towards pet animals.

***The Code combines minimum standards with best practices, blurring the line between basic and optimal care.***

12. The Code may lead to confusion as it presents minimum standards and best practices together. This juxtaposition of basic legal requirements with optimal care guidelines can blur the lines, making it unclear for pet owners to discern the exact level of care they are expected to meet.
13. In its attempt to cover a wide range of scenarios for pet owners, the Code may unintentionally endorse practices that are not ideal for animals. By presenting less beneficial options alongside best practices, the Code risks inadvertently encouraging negative behaviours, potentially lowering the overall standard of care.
14. This broad approach, while aiming to be inclusive, could lead to situations where pet owners feel justified in providing suboptimal care, believing they are still within acceptable guidelines.
15. As a result, there may be uncertainty over what is legally required versus what is recommended for achieving higher standards of animal welfare. Clearer distinctions between these sections could help avoid ambiguity and improve compliance.
16. For example, Section 2.2 is titled “Confinement” which may unintentionally suggest that confinement is a standard or acceptable practice for pet animals who generally thrive in a free-roaming environment, such as dogs, cats, and rabbits. It should be explicitly stated that confinement should only be considered for medical or safety reasons. Without this clear distinction, the Code may cause pet owners to mistakenly believe that regularly caging these animals is acceptable, despite their inherent need for freedom and space within the home.
17. The Committee also suggests renaming “Confinement” to “Pet Housing” to avoid a negative connotation. “Confinement” may imply a need for caging or restricting their freedom, which may not accurately reflect the intended guidelines for appropriate housing. By using the term “Pet Housing”, the focus shifts towards creating suitable, safe, and enriching environments for pets.
18. Section 2.3 is titled “Tethering” and does not mention the dangers associated with prolonged use of tethers. This may lead pet owners to mistakenly believe that tethering their dogs for extended periods, or even for their entire lives, is acceptable. The absence of guidance on limiting the duration of tethering could endorse harmful practices. Prolonged tethering can significantly impact

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<sup>301</sup> Mellor, D. J., Beausoleil, N. J., Littlewood, K. E., McLean, A. N., McGreevy, P. D., Jones, B., & Wilkins, C. (2020). The 2020 Five Domains model: Including human-animal interactions in assessments of animal welfare. *Animals*, 10(10), 1870. <https://doi.org/10.3390/ani10101870>

a dog's physical and psychological wellbeing, and clearer language on appropriate tethering practices, including time limits, would help promote more humane treatment.

19. Section 3.5 focuses on the care of pregnant animals and their offspring, which may inadvertently suggest that breeding animals at home is acceptable. It should mention the benefits of spaying and neutering. It should also highlight that while home breeding is not illegal, selling animals without a licence is, and clearly outline the legal consequences for doing so.
20. The Committee acknowledges the importance of providing pet owners with clear guidance that caters for a range of situations a pet owner may encounter.
21. As such, the Code should be revised to clearly differentiate between recommended practices and those that are less ideal, offering greater clarity. This could be presented through distinct sections or visual markers, such as separate headings or highlighted text, making it easy for readers to identify the difference between the legal minimum requirements and the best care practices that promote optimal animal welfare.

***The lack of specificity in the Code may lead to inconsistent levels of welfare for pet animals.***

22. The current guidelines outlined in the Code are vague, allowing pet owners significant discretion to determine best practices.
23. For example, it states that pets should be housed “in an area that is large enough for them to move around comfortably”. It also suggests that a bird’s “tether should be long enough to allow it to move about comfortably”.
24. However, the term “comfortably” is open to interpretation, leading to varying standards of care. In many cases handled by AWGs, pet owners confine large dogs to small, fenced spaces, depriving them of the necessary enrichment for their wellbeing.
25. To address this, the Code could benefit from more precise language, such as offering a minimum recommended ratio of space to size of the dog, ensuring that owners provide adequate environments that meet the animals' physical and psychological needs.
26. The current Code also does not sufficiently address species-specific information that is essential for the wellbeing of small animals. Different species have varied needs, especially for small animals like guinea pigs, gerbils, hamsters, and chinchillas, typically kept in cages for their entire lives.
27. Currently, the Code only suggests providing these animals with clean and dry bedding and designated areas for rest, feeding, exercise, and exploration. The proper setup of their enclosures, including cage design and the provision of appropriate enrichment, plays an important role in their welfare, helping to reduce stress and prevent injuries. The Code does not fully address the need for an enriching and adequately sized environment.
28. The Code also fails to address the minimum standards required for keeping terrapins. With low barriers to entry for purchasing terrapins as pets, they are among the most vulnerable pet species. This vulnerability is exacerbated by their long lifespans and their inability to visibly express pain or discomfort, making it difficult for pet owners to recognise when their needs are not being met.

29. The Code primarily focuses on fulfilling the basic requirements of the Animals and Birds Act but falls short in actively promoting the best practices needed to ensure a high quality of life for pets. Given that pet ownership is a privilege, not an inherent right, the Code should emphasise higher standards of care to reflect this responsibility.

***Beyond setting higher standards for animal welfare, Recommendation 13 will promote better neighbourliness.***

30. Strengthening the Code would not only benefit animal welfare but also improve community relations.
31. Through their 24-hour hotline, the SPCA has identified several common complaints from neighbours regarding pet animals. Broadening the scope of the Code of Animal Welfare to address some of these issues will help promote better neighbourliness.
32. The most frequently received complaints relate to:
  - a. **Caterwauling.** This refers to the loud vocalisations made by cats, often expressing frustration and unmet needs, particularly when they are in heat. Unsterilised cats may also mark territories by spraying, sometimes urinating outside neighbours' houses. Including a recommendation for sterilisation of pets in the Code can help reduce caterwauling in cats that arises from sexually driven behaviours.<sup>302</sup>
  - b. **Excessive barking.** With dogs, this often stems from negative emotions such as frustration and boredom. This may be alleviated by ensuring they receive adequate physical exercise and enrichment. Encouraging dog owners to walk their dogs at least twice a day for minimally 30 minutes each time may reduce barking.<sup>303</sup> Regular walks provide not only physical exercise but also mental stimulation and socialisation, thus enhancing the dog's overall wellbeing. Pet owners should be encouraged to approach dog trainers who are proficient in positive reinforcement methods to help them understand the root causes of excessive barking.
  - c. **Poor living conditions for pets.** This can lead to inconveniences for neighbours, with common complaints including strong odours, unhygienic environments, and pets being caged in ways that obstruct common pathways. Pet waste can generate unpleasant smells, spread disease, and attract insects. Clearer guidelines, such as recommending specific frequencies for changing litter or bedding and maintaining a clean living area, would help ensure that pet owners maintain adequate hygiene standards. Similarly, the Code should discourage pet owners from keeping their pets outside their houses in common pathway areas. As a preventive measure, the Code could provide information on hoarding situations.
33. Broadening the scope of the Code could also enhance public understanding of acceptable pet care, allowing individuals to more accurately determine if a pet is in distress due to inappropriate housing. This improved clarity may help prevent false accusations against pet owners, thereby reducing friction between neighbours.

<sup>302</sup> Animal & Veterinary Service, NParks. (n.d.). *Cat Management Framework: Frequently asked questions*. Retrieved September 6, 2024, from <https://www.nparks.gov.sg/avs/pets/cat-management-framework/cat-management-framework/frequently-asked-questions>

<sup>303</sup> Zilocchi, M., Tagliavini, Z., Cianni, E., & Gazzano, A. (2016). Effects of physical activity on dog behavior. *Dog Behavior*, 2(2), 9–14. <https://doi.org/10.4454/db.v2i2.34>

34. Concurrently, prospective pet owners could use the Code to better understand the full spectrum of responsibilities involved in keeping pets, enabling them to make more informed decisions about whether they are ready for the commitment. This would expand the Code's purpose, serving not only as a reference for existing pet owners but also as a comprehensive guide for prospective pet owners.

***Recommendation 13 will reinforce the standards outlined in the Animals and Birds Act and help ensure better compliance with animal welfare regulations.***

35. Offering more detailed guidelines for pet owners will help reduce the risk of accidental violations of the Animals and Birds Act due to limited knowledge about animal care standards.
36. Since the Code of Animal Welfare is not legally enforceable, including reminders of failure-to-act clauses set out in the Animals and Birds Act can serve as a reminder for pet owners to take the guidelines seriously. These clauses would emphasise the importance of adhering to the recommendations and underscore potential consequences of inaction.
37. Additionally, the Code should facilitate clear assessment and measurement of non-compliance with minimum standards, providing objective criteria for enforcement bodies. This approach would ensure consistency in case judgments, reducing reliance on subjective evaluation.

***Conclusion on Recommendation 13***

38. Revising the Code of Animal Welfare to clearly distinguish between minimum standards and best practices will provide pet owners with a clearer understanding of their responsibilities, ensuring they meet both the basic and optimal standards of care.
39. Incorporating more precise guidelines, species-specific guidelines, and addressing common neighbourhood concerns (such as excessive barking and poor hygiene) will enable the Code to promote higher standards of animal welfare and improve community relations.
40. Introducing failure-to-act clauses and objective criteria for measuring compliance will strengthen the Code's effectiveness, ensuring better alignment with the Animals and Birds Act and reducing the risk of accidental violations through clearer guidelines for pet owners.





STRENGTHENING PROTECTIONS FOR ANIMAL WELFARE

**AREA 4** WILDLIFE PROTECTION



**Recommendation 14:**

**Remove the exempted birds from the Wildlife (Exemption) Order 2020, or subject the exemption to conditions that persons must satisfy to utilise the exemptions**

1. The Committee recommends that Part 2 of the Schedule in the Wildlife (Exemption) Order 2020 (“**WE Order**”) be amended to remove all four birds (the “**Exempted Birds**”) from the exemption to Section 5C of the Wildlife Act 1965 (“**Wildlife Act**”) or, at the least, that the common myna be removed from Part 2 of the WE Order.<sup>304</sup>
2. Alternatively, the Committee recommends that the WE Order include a self-reporting requirement that, insofar as the Exempted Birds in Part 2 of the WE Order are concerned, the person making use of the exemption must be satisfied that:
  - a. On the evidence (i.e. scientific evidence such as ecosystem impact assessments, evidence of actual risks, and whether humane measures have been tried and did not work, hence the resort to depopulation), it is necessary for the person to kill, trap, or take the Exempted Birds
  - b. The methods the person intends to employ for killing, trapping, or taking the Exempted Birds prevent or reduce unnecessary animal suffering
  - c. These records should be kept by said person and thereafter be liable to be audited. If evidence arises of unnecessary suffering or needless culling, inadequate or unsatisfactory records could:
    - i. Form the basis of prosecution under Section 5C of the Wildlife Act itself, or
    - ii. Form the basis of an adverse inference drawn against a person who has failed to keep relevant records in a prosecution under Section 42 of the Animals and Birds Act
3. For avoidance of doubt, whether the Exempted Birds are removed from the WE Order, and if the Director-General (“**DG**”) in his discretion permits any depopulation exercises for public health concerns, or if the alternative proposal in paragraph 2 of this Recommendation is adopted, the person(s) conducting such depopulation exercises will also be subject to a post-exercise reporting mechanism where:
  - a. The effects on the population and behaviour of the Exempted Birds post-culling should be recorded, so as to analyse the effectiveness of such a culling exercise, and
  - b. The environmental impacts of such culling should be observed and set out in a report
4. The relevant history of the Wildlife Act and the WE Order is first discussed, before setting out a broad summary of the reasons for Recommendation 14. This is followed by an elaboration on the background of and scientific documentation on the four Exempted Birds, the problems they are said to cause, the present-day methods used to manage their populations, as well as the parliamentary discourse on the Exempted Birds. The Committee then explains why, in light of all that will be discussed, Recommendation 14 should be adopted.

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<sup>304</sup> To be clear, the Committee’s recommendation does not extend to an absolute prohibition of all culling exercises, but for any such exercise to be subject to the oversight of the Director-General, Wildlife Management.

### **History of the WE Order**

5. The WE Order came into force in June 2020. It provides for exemptions to Section 5C(1) of the Wildlife Act. Section 5C(1) of the Wildlife Act states that a person must not intentionally kill, trap, take, or keep any wildlife in any place unless the person has the DG's authority to do so.
6. The Schedule of the WE Order lists certain "pest" and non-threatened invertebrate species ("**Exempted Species**") for which this authorisation is not required. Consequently, actions such as culling and depopulating Exempted Species do not need DG's approval for large scale operations. The Schedule of the WE Order lists, inter alia, four wild birds — the house crow, feral pigeon, common myna, and white-vented myna.
7. The concept of setting out an exemption to a prohibition against the killing, trapping, taking, or keeping of wildlife subject to DG authority is not novel to the Wildlife Act.
8. The Wild Birds Protection Ordinance 1884 ("**1884 Ordinance**"), enacted on 10 June 1884, set out numerous penalties for, inter alia, the killing, wounding, and taking of wild birds, except for a list of around 31 species of birds listed in the Schedule of the 1884 Ordinance who were exempted from the protections of the 1884 Ordinance.<sup>305</sup> This appears to have been an adaptation of the English Wild Birds Protection Act 1880, which similarly included protections for birds except for specific species listed in a schedule.<sup>306</sup> Experts have subsequently criticised the approach of the 1884 Ordinance, pointing out that the "lack of liaison between the legislature and the natural scientist is apparent, as some birds named in the Order were either already extinct, non-existent or not found in Singapore".<sup>307</sup>
9. The 1884 Ordinance was replaced in 1904 by the Wild Animals and Birds Protection Ordinance 1904 ("**1904 Ordinance**") which expanded the legislation to protect wild animals as well. It also empowered the Governor in Council to make orders declaring certain periods to be closed season for the hunting of certain animals, or to prescribe the breeding season of any wild bird, prohibiting the netting, snaring, or taking by means of contrivance, of any wild bird.<sup>308</sup> Thereafter, orders were sporadically made via the 1904 Ordinance to extend protection to certain animals and birds. For example, January to May 1924 were declared as close season for seven species and birds. Between 1904 and 1974, the animals and birds listed in the schedule generally hovered between 30 to 40.<sup>309</sup>
10. The next significant change took place in 1974. All but one of the animals and birds listed in the schedule were removed. The only bird left on the schedule was the house crow (*Corvus splendens*).<sup>310</sup> Between 1974 and 1991, **all** wild animals and birds apart from the house crow were therefore protected under the Wild Animals and Birds Act (Cap 296, 1970 Rev Ed, and afterwards 1985 Rev Ed).

<sup>305</sup> Wild Birds Protection Ordinance 1884, Sections 2, 3, 4, and 7 read with the Schedule.

<sup>306</sup> Marchant, J. R. V. (2022). *Wild Birds Protection Acts, 1880–1896*. Chapter 5 at 56–57. R. H. Porter (London).

<sup>307</sup> Heng, L. L. (1991). Wildlife protection laws in Singapore. *Singapore Journal of Legal Studies*, 1991, 287–319. <https://www.jstor.org/stable/24865805> (at 293).

<sup>308</sup> Wild Animals and Birds Protection Ordinance 1904, Sections 2 and 3.

<sup>309</sup> Heng, L. L. (1991). Wildlife protection laws in Singapore. *Singapore Journal of Legal Studies*, 1991, 287–319. <https://www.jstor.org/stable/24865805> (at 293–294).

<sup>310</sup> Wild Animals and Birds (Amendment of Schedule) Notification, 1974. G.N. No. S 122/1974.

11. In December 1991, the schedule was amended to include five other birds than the house crow, marking the first time that the Exempted Birds of present concern appeared collectively within the legislation, together with the Philippine glossy starling and the purple-backed starling.<sup>311</sup>
12. These six birds remained on the schedule (the “**WABA Schedule**”) between 1991 and 2020. The legislative mechanism for the exemption remained similar to the 1884 Ordinance. Read with Sections 5 and 8(e) of the Wild Animals and Birds Act (Cap 351, 2000 Rev Ed) (“**WABA 2000**”), the WABA Schedule effectively excluded these listed birds from certain protections offered by the WABA 2000. For example, without a licence, it would generally be an offence under Section 5 to kill, take, or keep a non-WABA Scheduled wild animal or bird. However, these actions would not be considered offences if they involved a bird from the WABA Schedule, such as the purple-backed starling or common myna.
13. The Wildlife Act in its present form was enacted in 2020, after an extensive review by the Wild Animal Legislation Review Committee (“**WALRC**”) that formed the backdrop of the Wild Animals and Birds (Amendment) Bill (the “**WAB Bill**”), a Private Member’s Bill by former MP for Nee Soon, Mr Louis Ng. The WABA Bill renamed the Wild Animals and Birds Act (Cap 351, 2000 Rev Ed) (“**WABA 2000**”) to the Wildlife Act. The overarching intent of the Wildlife Act is to balance the maintenance of a healthy ecosystem while addressing public health and safety concerns.
14. During the second reading of the WAB Bill, former MP Mr Ng explained that the WALRC had initially proposed the complete removal of the WABA Schedule. However, due to public concerns at that time, it was decided that the possibility of a complete removal would be reviewed at a later stage.<sup>312</sup>
15. The Schedule was moved to subsidiary legislation with the enactment of the Wildlife Act. In particular, the Minister for National Development exercised his powers under Section 20 of the Wildlife Act<sup>313</sup> to enact the WE Order.
16. The WE Order, which came into force in June 2020, functions similarly to the WABA Schedule. However, whereas the WABA Schedule listed six wild birds, the Schedule of the WE Order lists only four wild birds — the house crow, feral pigeon, common myna, and white-vented myna — with the purple-backed starling and Philippine glossy starling removed.<sup>314</sup>
17. At this juncture, it should be noted that Section 42 of the Animals and Birds Act, which criminalises animal cruelty, remains applicable to the Exempted Species.<sup>315</sup>

<sup>311</sup> (1) House crow (*Corvus splendens*), (2) feral pigeon (*Columba livia*), (3) purple-backed starling (*Agropsar sturninus*), (4) Philippine glossy starling (*Aplonis panayensis*), (5) common myna (*Acridotheres tristis*), and (6) white-vented myna (*Acridotheres javanicus*).

<sup>312</sup> Singapore Parliamentary Debates. (2020, March 25). *Official Report vol 94*. Louis Ng Kok Kwang, Member of Parliament for Nee Soon GRC.

<sup>313</sup> Section 20 of the Wildlife Act gives the Minister for National Development powers to exempt any person, place, or wildlife, or any class of persons, places, or wildlife, from all or any of the provisions of the Wildlife Act, either generally or in a particular case and subject to any condition the Minister may impose.

<sup>314</sup> Compared to the WABA Schedule, the WE Order also includes a number of other species of rats, reptiles, and all species of invertebrates other than protected wildlife.

<sup>315</sup> “Animal” is defined at Section 41 of the Animals and Birds Act 1965 as including any beast, bird, fish, or reptile, whether wild or tame. The Wildlife (Exemption) Order 2020 does not offer an exemption from Section 42 of the Animals and Birds Act 1965.

### **Overview of Recommendation 14**

18. Recommendation 14 seeks to remove the Exempted Birds from the WE Order, thereby subjecting any decision regarding the killing, trapping, or taking of such Exempted Birds to the prior written consent of the DG. This returns the Exempted Birds to the purview of the Wildlife Act, creating an additional threshold to ensure that steps are taken to protect and preserve indiscriminate and unjustified depopulation.
19. There is presently no statutory provision in the Wildlife Act on how the DG is to exercise his discretion to provide his approval, or determine the conditions that an approval is subject to,<sup>316</sup> although given that the Wildlife Act is centrally concerned about ensuring a healthy ecosystem and public safety and health, it has been said that the DG, in his exercise of discretion, ought to “at least consider whether his decisions would advance these purposes”.<sup>317</sup>
20. The Committee therefore envisions that a framework to guide the DG’s exercise of discretion would be helpful. This framework should include the need to provide evidence or justification that the Exempted Birds should be killed, trapped, or taken, with scientific evidence such as ecosystem impact assessments, evidence of actual risks, maximum number and age-group of birds to be culled, period of culling, and whether non-lethal methods of population control or humane methods of killing, trapping, or taking the birds are feasible.
21. After each approved culling exercise is conducted, the DG shall be provided with the following details set out in the form of a report, elaborating on, in particular:
  - a. The reasons for the depopulation
  - b. The number and the species of animals killed, whether inadvertently or consciously in the course of the culling exercise
  - c. The stunning and killing methods used
  - d. A description of the difficulties encountered and, where appropriate, solutions found to alleviate or minimise the suffering of the animals concerned

### **Background to the four wild birds in the Schedule of the WE Order**

22. Recommendation 14 concerns four species of birds, each of which have given rise to different concerns and considerations over the years. To provide context on this recommendation, a brief history is provided on the four wild birds in the Schedule of the WE Order and their experience in Singapore, as well as past efforts at population control and the issues that have been raised.

#### **House crows**

23. House crows (*Corvus splendens*) are not native to Singapore. They were introduced to Peninsular Malaysia in the late nineteenth century as a biological control agent for caterpillars and thereafter

<sup>316</sup> Chun, J. (2020, July). *The Wild Animals and Birds (Amendment) Act (Act No 16 of 2020)*. APCEL Working Paper Series, No 20/05. <https://law1a.nus.edu.sg/apcel/publications/pdfs/APCEL-WPS-2005.pdf> (at p. 7).

<sup>317</sup> Ibid.

spread to mainland Singapore in the late 1930s or early 1940s. The crow population was estimated to be around 200–400 individuals in the late 1960s, expanding to over 4,500 in the mid-1980s, and eventually to more than 130,000 by the year 2000.<sup>318</sup>

24. During this time, the population of the house crow was managed by ad-hoc culling as and when it was safe and possible to do so.<sup>319</sup> Around 1,000 to 1,500 crows a month were killed between 1998 and 2000.<sup>320</sup> It was recognised that culling had to be done in conjunction with food reduction and pruning of dense foliage, as well as the cooperation of the public in the long run.<sup>321</sup> However, it appears from Parliamentary discourse that, at the time, the population of crows in Singapore had been underestimated to be around 6,000<sup>322</sup> when the actual number was more than 130,000.
25. Between February 2000 and February 2001 and in response to the drastic increase in population of house crows in Singapore, Brook et al. (2003) conducted a study funded by the Agri-food and Veterinary Authority of Singapore (“**AVA**”) to study the autecology<sup>323</sup> and behaviour of house crows to provide scientifically rigorous guidelines for managers, prior to the initiation of a large-scale control programme. The management goal was to determine the level of culling required to reduce crow density from its 2001 levels (190 birds / square kilometre) to <10 birds / square kilometre within a 10-year period (the “**2000 to 2001 Study**”). The results of this study were published in the *Journal of Wildlife Management* in 2003.<sup>324</sup>
26. Brook et al. (2003) found that past attempts at controlling the house crow population (such as via poisoning, shooting, and nest destruction) frequently ended in failure due to a consistent lack of informed scientific input, such that management actions were implemented laissez-faire, consequently reducing the chances of success. For example, a large-scale culling exercise that poisoned over 240,000 birds in Aden, Yemen over a two-year period was ultimately unsuccessful because a lack of comparable effort in neighbouring Yemeni cities meant that the migrating birds quickly replaced the losses.<sup>325</sup>
27. After studying the population abundance, density, and structure of the Singaporean house crow population, Brook et al. (2003) concluded that a **substantial, coordinated, and multifaceted effort** would be required to effectively suppress the house crow population on mainland Singapore, with 41,000 birds to be culled in the first year of the control programme, and approximately 250,000 birds within the next 10 years.<sup>326</sup>

<sup>318</sup> Brook, B. W., Sodhi, N. S., Soh, M. C. K., & Lim, H. C. (2003). Abundance and projected control of invasive house crows in Singapore. *The Journal of Wildlife Management*, 67(4), 808–817. <https://doi.org/10.2307/3802688> (at 809).

<sup>319</sup> Singapore Parliamentary Debates. (2000, November 13). *Official Report vol 72* at cols 1018–1019. Dr John Chen Seow Phun, Minister for National Development.

<sup>320</sup> Singapore Parliamentary Debates. (2000, March 13). *Official Report vol 71* at cols 1877–1878. Encik Sidek bin Saniff, Senior Minister of State for the Environment.

<sup>321</sup> Singapore Parliamentary Debates. (2000, November 13). *Official Report vol 72* at cols 1018–1019. Dr John Chen Seow Phun, Minister for National Development.

<sup>322</sup> Singapore Parliamentary Debates. (2000, March 13). *Official Report vol 71* at cols 1880–1881. Encik Sidek bin Saniff, Senior Minister of State for the Environment.

<sup>323</sup> A study to explain the distribution and abundance of a species.

<sup>324</sup> Brook, B. W., Sodhi, N. S., Soh, M. C. K., & Lim, H. C. (2003). Abundance and projected control of invasive house crows in Singapore. *The Journal of Wildlife Management*, 67(4), 808–817. <https://doi.org/10.2307/3802688> (at 809).

<sup>325</sup> *Ibid.*

<sup>326</sup> *Id.*, [814].

28. As the house crow population in Singapore is highly dependent on human food sources, Brook et al. (2003) went further to suggest that a substantial reduction in carrying capacity<sup>327</sup> could be achieved via the following measures<sup>328</sup>:
  - a. Minor adjustments to the design of existing bin centres (to prevent house crows from entering to forage)
  - b. Regular pruning of trees with larger and denser crowns to discourage nesting and roosting
  - c. Planting of alternative tree species that are less suitable for crow nesting and roosting
29. Brook et al. (2003) therefore advocated for **a multifaceted approach involving a substantial, coordinated culling effort**, coupled with a strategy of nest destruction and limitation of food supply and suitable nesting sites, to control the Singaporean house crow population. However, Brook et al. (2003) also warned of adverse side effects caused by the displacement of a previously abundant and established species. In particular, it suggested that the population of the white-vented myna might be held in check by the high population of house crows, such that the removal of the house crows might lead to an ecological “release” and an explosion in myna numbers.<sup>329</sup>
30. The proposed measures were undertaken, and by 2010 the house crow population had noticeably declined while the white-vented myna<sup>330</sup> population increased.<sup>331</sup>
31. A follow-up survey (the “**2010 to 2011 Study**”) was conducted by Chong et al. (2012) nine years after the 2000 to 2001 Study, between March 2010 and February 2011, to investigate the changes in the abundance of common urban bird species over the past decade by comparing numbers compiled in their field surveys with the numbers collected in the 2000 to 2001 Study. This study also sought to test if the decline in house crow abundance was in fact correlated with the increase in white-vented myna abundance, as cautioned in previous studies such as the 2000 to 2001 Study.<sup>332</sup>
32. The 2010 to 2011 Study found that, apart from the house crow and the common myna (whose populations each decreased significantly), most of the 20 most common species of birds increased significantly in abundance. There was no significant correlation between the decrease in house crow population and the increase in white-vented myna population.<sup>333</sup>
33. Chong et al. (2012) found that the control of house crows between 2000 and 2001 was largely successful with minimal or no negative impacts. While culling played a major role, other factors such as Singapore’s municipal waste management likely contributed.<sup>334</sup>

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<sup>327</sup> The maximum population size of a biological species.

<sup>328</sup> Brook, B. W., Sodhi, N. S., Soh, M. C. K., & Lim, H. C. (2003). Abundance and projected control of invasive house crows in Singapore. *The Journal of Wildlife Management*, 67(4), 808–817. <https://doi.org/10.2307/3802688> (at 815).

<sup>329</sup> Ibid.

<sup>330</sup> Referred to by Brook et al. (2003) as the Javan myna (*Acridotheres javanicus*).

<sup>331</sup> Chong, K. Y., Teo, S., Kurukulasuriya, B., Chung, Y. F., Rajathurai, S., Haw, C. L., & Tan, H. T. W. (2012). Decadal changes in urban bird abundance in Singapore. *The Raffles Bulletin of Zoology*, 25, 189–196. <https://lcnhm.nus.edu.sg/wp-content/uploads/sites/11/app/uploads/2017/06/s25rbz189-196.pdf> (at 190).

<sup>332</sup> Ibid.

<sup>333</sup> *Id.*, [192].

<sup>334</sup> Ibid.



34. In 2020, Singapore's nation-wide stay-home order between 7 April and 1 June 2020, referred to as the Circuit Breaker, restricted people from leaving their residence except for essential services and activities. Dining in at food establishments was also prohibited. This presented researchers with an unprecedented opportunity to examine the responses of invasive birds to an island-wide reduction in human traffic and food. Soh et al. (2021) therefore conducted a study (the "**Circuit Breaker Study**"), supported by NParks, to investigate the impact of a nationwide restriction on human activities on the abundance of feral pigeons, white-vented mynas, common mynas, and house crows.<sup>335</sup>
35. Soh et al. (2021) found that limiting human-provided food reduced the abundance of house crows, although not to the same extent as the drop in rock pigeon abundance.<sup>336</sup> The collective results of the Circuit Breaker Study advocated a food limitation approach to controlling the feral pigeon (as well as house crow) populations in Singapore.

### Feral pigeons

36. The feral pigeon (also referred to as the rock pigeon or *Columba livia*) is a non-native species. The earliest record of the feral pigeon in Singapore is of a group kept in the Singapore Botanic Gardens for exhibition at the turn of the 20<sup>th</sup> century. In the 1960s, there were a few hundred feral pigeons within Singapore's city centre. Tang et al. (2018) posits that it is likely that all feral pigeons in Singapore are descendants of the feral pigeons documented in the 1960s.<sup>337</sup> The population of feral pigeons, as at 2021, was estimated to be around 200,000.<sup>338</sup>
37. According to Tang et al. (2018), human activities and manmade structures play a significant role in the distribution and dispersal of feral pigeons. The distribution and dispersal of feral pigeons is best predicted by their level of exposure to mercy feeding by humans and the urban landscape they inhabit. Higher densities of pigeons are found near areas with food resources, especially in high-rise areas, with intentional feeding being a far better predictor of pigeon density than unintentional feeding (e.g. litter bins, grocery stores, fast food restaurants). High-rise landscapes are favourable for feral pigeons as they superficially resemble their natural habitats, i.e. rock faces, caves, and cliffs. Tall buildings allow the pigeons to roost and nest at their preferential heights of more than 20 metres above ground, to avoid predation and disturbances.<sup>339</sup>
38. The Circuit Breaker Study conducted by Soh et al. (2021) also produced similar results. The drop in human presence and reduction in feeding or food littering led to a drastic reduction of feral pigeons in urban spaces. Inter alia, the feral pigeon abundance in open food centres dropped by

<sup>335</sup> Soh, M. C. K., Pang, R. Y. T., Ng, B. X. K., Lee, B. P. Y-H., Loo, A. H. B., & Er, K. B. H. (2021). Restricted human activities shift the foraging strategies of feral pigeons (*Columba livia*) and three other commensal bird species. *Biological Conservation*, 253, 108927. <https://doi.org/10.1016/j.biocon.2020.108927>

<sup>336</sup> Ibid.

<sup>337</sup> Tang, Q., Low, G. W., Lim, J. Y., Gwee, C. Y., & Rheindt, F. E. (2018). Human activities and landscape features interact to closely define the distribution and dispersal of an urban commensal. *Evolutionary Applications*, 11(9), 1598–1608. <https://doi.org/10.1111/eva.12650> (at 1604).

<sup>338</sup> Soh, M. C. K., Pang, R. Y. T., Ng, B. X. K., Lee, B. P. Y-H., Loo, A. H. B., & Er, K. B. H. (2021). Restricted human activities shift the foraging strategies of feral pigeons (*Columba livia*) and three other commensal bird species. *Biological Conservation*, 253, 108927. <https://doi.org/10.1016/j.biocon.2020.108927> (at 2).

<sup>339</sup> Tang, Q., Low, G. W., Lim, J. Y., Gwee, C. Y., & Rheindt, F. E. (2018). Human activities and landscape features interact to closely define the distribution and dispersal of an urban commensal. *Evolutionary Applications*, 11(9), 1598–1608. <https://doi.org/10.1111/eva.12650> (at 1604, 1605).

more than half in less than two months due to the effects of reducing food supply.<sup>340</sup> The decreased food availability also meant that the feral pigeons spent significantly less time resting and more time moving and foraging, resulting in reduced reproductive capacity and population growth as well as an increase in nestling mortality.<sup>341</sup>

39. Soh et al. (2021) therefore recommended a food limitation approach to control the population of feral pigeons.<sup>342</sup>

#### White-vented myna and common myna

40. The white-vented myna (*Acridotheres javanicus*) is a non-native species that was most likely introduced to Singapore around 1924 via the pet bird trade. On the other hand, the common myna (*Acridotheres tristis*) extended its natural range from the Malay Peninsula to Singapore sometime around 1936<sup>343</sup> and is considered to be a native species.<sup>344</sup>
41. The 2010 to 2011 Study found that, as compared to 2001, the number of white-vented mynas had increased significantly while the common myna was found to have significantly decreased in abundance in that same period. Chong et al. (2012) attributed the increase in the white-vented myna population to increasing urbanisation instead, in particular, the occurrence of more private low-rise development and clearance of more spontaneous vegetation.<sup>345</sup>
42. As for the common myna, the significant decrease in abundance was hypothesised to be because the common myna is less capable at exploiting ephemeral food sources in urbanised landscapes compared to the white-vented myna.<sup>346</sup> This coheres with the status of the common myna elsewhere in the world. The common myna is generally strongly associated with the rural landscape and known to inhabit open woodland and grassland, and is a common commensal of humans in villages or suburbs. It has been suggested that the decline in population of the common myna in Singapore can be attributed to the gradual loss of its preferred habitat, agricultural land.<sup>347</sup>
43. A study conducted by Yap et al. (2002) found that tree canopy density was the most important factor for roost site selection by mynas, with the next most important factor being the proximity of roost sites to food centres since mynas rely on scraps of human refuse as a supply of food.<sup>348</sup> Yap et al. (2002) suggested that the management of roosting mynas must be approached from various

<sup>340</sup> Soh, M. C. K., Pang, R. Y. T., Ng, B. X. K., Lee, B. P. Y.-H., Loo, A. H. B., & Er, K. B. H. (2021). Restricted human activities shift the foraging strategies of feral pigeons (*Columba livia*) and three other commensal bird species. *Biological Conservation*, 253, 108927. <https://doi.org/10.1016/j.biocon.2020.108927> (at 7).

<sup>341</sup> Ibid.

<sup>342</sup> *Id.*, [8].

<sup>343</sup> Yap, C. A.-M., Sodhi, N. S., & Brook, B. W. (2002). Roost characteristics of invasive mynas in Singapore. *The Journal of Wildlife Management*, 66(4), 1118–1127. <https://doi.org/10.2307/3802943> (at 1118).

<sup>344</sup> Chong, K. Y., Teo, S., Kurukulasuriya, B., Chung, Y. F., Rajathurai, S., Haw, C. L., & Tan, H. T. W. (2012). Decadal changes in urban bird abundance in Singapore. *The Raffles Bulletin of Zoology*, 25, 189–196. <https://lcnhm.nus.edu.sg/wp-content/uploads/sites/11/app/uploads/2017/06/s25rbz189-196.pdf> (at 193). See also Wu, B. (2020). What's That (Black) Bird? NParks Buzz, 2.

<sup>345</sup> Chong, K. Y., Teo, S., Kurukulasuriya, B., Chung, Y. F., Rajathurai, S., Haw, C. L., & Tan, H. T. W. (2012). Decadal changes in urban bird abundance in Singapore. *The Raffles Bulletin of Zoology*, 25, 189–196. <https://lcnhm.nus.edu.sg/wp-content/uploads/sites/11/app/uploads/2017/06/s25rbz189-196.pdf> (at 195).

<sup>346</sup> *Id.*, [190].

<sup>347</sup> Lim, H. C., Sodhi, N. S., Brook, B. W., & Soh, M. C. K. (2003). Undesirable aliens: Factors determining the distribution of three invasive bird species in Singapore. *Journal of Tropical Ecology*, 19(6), 685–695. <http://dx.doi.org/10.1017/S0266467403006084> (at 692–693).

<sup>348</sup> Yap, C. A.-M., Sodhi, N. S., & Brook, B. W. (2002). Roost characteristics of invasive mynas in Singapore. *The Journal of Wildlife Management*, 66(4), 1118–1127. <https://doi.org/10.2307/3802943> (at 1125).

angles and has to be a sustained effort, by thinning the canopy of existing roosts, controlling refuse at food centres stringently, and complementing heavy pruning with the planting of suitable roost trees in areas where the impact of roosts on humans would be minimal.<sup>349</sup>

44. A study commissioned by the AVA and conducted by Low et al. (2018) on the population structure and history of the white-vented myna came to the conclusion that even with extraordinary effort and extreme cost, near-complete eradication of the white-vented myna population would “likely be followed by a re-bounding through an influx of reinvasions from the uncontrolled population in nearby peninsular Malaysia”.<sup>350</sup> Low et al. (2018) suggested that the Singapore authorities’ approach ought to “aim at mitigation of nuisance in areas that are especially problematic, coupled with a long-term program to curb the entire population by reducing nesting opportunities and food sources often provided by an unwitting public that is unaware of the negative effects of their well-meant actions”.<sup>351</sup>
45. The Circuit Breaker Study demonstrated that, like house crows, the white-vented myna population was sensitive to changes in food availability. Soh et al. (2021) therefore similarly recommended a food reduction approach to reduce the abundance of white-vented mynas. They noted that common mynas were less dependent on human food sources and, therefore, less affected by decreases in food abundance.<sup>352</sup>

#### ***Present-day culling methods and commentary***

46. Today, the approach that Singapore has taken has been described as, inter alia, “holistic”<sup>353</sup> and “science- and community-based” and appears to be exactly the multifaceted, coordinated approach<sup>354</sup> that the academic literature has unanimously endorsed. In particular, a combination of the following is employed<sup>355</sup>:
  - a. Habitat modification, involving the pruning of trees
  - b. Removal of nests
  - c. Community education and collaboration with food establishments on proper refuse management and enforcement of illegal bird feeding
  - d. Carrying out of studies to understand the roosting patterns and movements of birds

<sup>349</sup> *Id.*, [1126].

<sup>350</sup> Low, G. W., Chattopadhyay, B., Garg, K. M., Irestedt, M., Ericson, P. G. P., Yap, G., Tang, Q., Wu, S., & Rheindt, F. E. (2018). Urban landscape genomics identifies fine-scale gene flow patterns in an avian invasive. *Heredity*, 120, 138–153. <https://doi.org/10.1038/s41437-017-0026-1> (at 149).

<sup>351</sup> *Id.*, [150].

<sup>352</sup> Soh, M. C. K., Pang, R. Y. T., Ng, B. X. K., Lee, B. P. Y-H., Loo, A. H. B., & Er, K. B. H. (2021). Restricted human activities shift the foraging strategies of feral pigeons (*Columba livia*) and three other commensal bird species. *Biological Conservation*, 253, 108927. <https://doi.org/10.1016/j.biocon.2020.108927> (at 7).

<sup>353</sup> Singapore Parliamentary Debates. (2021, February 16). *Official Report vol 95*. Complaints about and methods to curb crow populations. Mr Desmond Lee, Minister for National Development.

<sup>354</sup> Brook, B. W., Sodhi, N. S., Soh, M. C. K., & Lim, H. C. (2003). Abundance and projected control of invasive house crows in Singapore. *The Journal of Wildlife Management*, 67(4), 808–817. <https://doi.org/10.2307/3802688> (at 815).

<sup>355</sup> **Crows:** Singapore Parliamentary Debates (2021, February 16). *Official Report vol 95*. Complaints about and methods to curb crow populations. Mr Desmond Lee, Minister for National Development. **Pigeons:** Singapore Parliamentary Debates. (2024, January 10). *Official Report vol 95*. Percentage of unresolved feeding complaints. Mr Desmond Lee, Minister for National Development. **Mynas:** Singapore Parliamentary Debates. (2018, August 6). *Official Report vol 95*. Solution to mynah nuisance along Upper Serangoon Road. Mr Lawrence Wong, Minister for National Development.

- e. Direct population control, which is said to be carried out in a “safe and humane” manner<sup>356</sup>
47. The importance of a coordinated approach has been repeatedly emphasised. As recently as November 2024, the NEA, NParks, and SFA have jointly stated that they “work together with Town Councils to raise public awareness about the negative impact of bird feeding and ensure measures are in place to manage the population of pigeons, crows, and mynas. These measures include reducing food sources for these birds.”<sup>357</sup>
  48. The adoption of a multifaceted and coordinated approach and the recognition of the importance of food source reduction is commendable. However, this Committee respectfully disagrees that the direct population control measures that have been adopted can be described as “safe and humane”.
  49. Presently, direct population control measures of the Exempted Birds mainly take the form of euthanasia by carbon dioxide.<sup>358</sup> Trapped pigeons, crows, mynas, and/or alpha-chloralose treated pigeons are placed in a bag. Carbon dioxide is then pumped into the bag, which suffocates the birds.
  50. This method raises significant ethical and welfare concerns, as outlined in veterinary guidelines like the American Veterinary Medical Association (AVMA) Guidelines for the Euthanasia of Animals.<sup>359</sup> Under these guidelines, CO<sub>2</sub> is considered humane only in **very specific circumstances** — CO<sub>2</sub> must be introduced gradually to prevent panic and distress. Sudden exposure to high concentrations of CO<sub>2</sub> causes severe discomfort and fear due to an immediate feeling of breathlessness before loss of consciousness.
  51. The current method employed in Singapore results in unnecessary suffering for the Exempted Birds as it lacks precise control over the flow rate and concentration of the CO<sub>2</sub>. AVMA’s guidelines dictate use of a purpose-built chamber with controlled CO<sub>2</sub> flow and gradual displacement of oxygen to induce loss of consciousness without distress, which a bag is unlikely to satisfy. Based on publicly available information, there is also no involvement of a veterinarian to ensure that the birds are clinically dead, potentially leading to situations where birds who have only been rendered unconscious regain consciousness when exposed to oxygen.
  52. Given that the current culling measures employed in Singapore do not appear to be aligned with AVMA guidelines, it is highly unlikely that these measures could be construed as “humane” or reasonable. While the Exempted Birds do not fall under the purview of the Wildlife Act, they are still subject to the protection under Section 42 of the Animals and Birds Act. It is imperative that even in situations where the Exempted Birds have to be culled, it should be done in a manner that does not inflict unnecessary suffering.

<sup>356</sup> Singapore Parliamentary Debates. (2022, August 1). *Official Report vol 95*. Feedback received on nuisances caused by crows and pigeons and effectiveness of measures taken. Mr Desmond Lee, Minister for National Development.

<sup>357</sup> National Environment Agency, NParks, & Singapore Food Agency. (2024, November 29). *Multi-pronged approach needed to tackle pest birds*. <https://www.nea.gov.sg/media/readers-letters/index/multi-pronged-approach-needed-to-tackle-pest-birds>

<sup>358</sup> Wong, E. (2024, June 25). *Pigeon control efforts to be stepped up in Ang Mo Kio, Bishan-Toa Payoh and Tanjong Pagar*. The Straits Times. <https://str.sg/mPrX>

<sup>359</sup> American Veterinary Medical Association. (2020). *AVMA guidelines for the euthanasia of animals: 2020 edition*. <https://www.avma.org/sites/default/files/2020-02/Guidelines-on-Euthanasia-2020.pdf>

53. Further, there is no public health emergency arising from the Exempted Birds that necessitates such drastic measures. Indeed, according to former MP Mr Louis Ng's speech in the second reading of the WAB Bill, the WE Order arose out of "public concerns". Per Chun (2020), this implies that the inclusion of, inter alia, the Exempted Birds in the WE Order was not based on evidence relating to the health of the ecosystem or public safety concerns.<sup>360</sup> There have been reports that culling exercises have been conducted because of complaints by residents that the birds' cawing and accumulated droppings are a "nuisance".<sup>361</sup> This Committee submits that the foregoing is insufficient justification for the culling of the Exempted Birds to be conducted via such inhumane methods, particularly when there are other humane alternatives (as discussed below).
54. To that end, the Committee recommends that the Exempted Birds should be removed from the WE Order for the following reasons:
- a. Recommendation 14 will prevent the adverse effects to the ecosystem arising from uncontrolled and unfettered depopulation of the Exempted Birds
  - b. Even if culling exercises are required for the Exempted Birds, subjecting such exercise to DG approval would facilitate a centralised, coordinated, and more effective approach
  - c. Removing the Exempted Birds from the WE Order will reduce unnecessary suffering for the birds.
55. Further to the above, and in any event, the common myna ought to be removed from the WE Order.

***Recommendation 14 aims to prevent the adverse effects to the ecosystem arising from unfettered depopulation of the Exempted Birds.***

56. While we recognise that these Exempted Birds (save for the common myna) are non-native to Singapore, studies have suggested that in the case of the feral pigeon, for example, their presence in our urban environment is a reflection of our environmental impact and can be used to monitor the environmental conditions.<sup>362</sup>
57. There is no systematic evidence to indicate that these three introduced non-native bird species (house crow, rock pigeon, and white-vented myna) have directly caused biologically significant decreases in native species populations. As per standardised definitions, they fall under introduced feral synanthropes<sup>363</sup> with preferential urban association but are viewed as a nuisance due to inconvenience caused to the public. In fact, the 2010 to 2011 Study conducted by Chong et al. (2012) found no significant correlation between all the bird abundances, although changes in bird

<sup>360</sup> Chun, J. (2020, July). *The Wild Animals and Birds (Amendment) Act (Act No 16 of 2020)*. APCEL Working Paper Series, No 20/05. <https://law1a.nus.edu.sg/apcel/publications/pdfs/APCEL-WPS-2005.pdf> (at p. 7).

<sup>361</sup> Ganesan, N. (2024, June 28). *CNA Explains: Singapore has a pigeon problem. What's being done about it?* Channel News Asia. <https://www.channelnewsasia.com/singapore/pigeons-culling-food-waste-illegal-feeding-cna-explains-4439146>

<sup>362</sup> Capoccia, S., Boyle, C., & Darnell, T. (2018). Loved or loathed, feral pigeons as subjects in ecological and social research. *Journal of Urban Ecology*, 4(1), 1–6. <https://doi.org/10.1093/jue/juy024>

<sup>363</sup> Francis, R. A. & Chadwick, M. A. (2012). What makes a species synurbic? *Applied Geography*, 32(2), 514–521. <https://doi.org/10.1016/j.apgeog.2011.06.013>

abundances were significantly associated with certain changes in the urban environment such as spontaneous or cultivated green cover.<sup>364</sup>

58. The Exempted Birds may also serve as important food sources for birds of prey.<sup>365</sup> In Singapore, there have been rare sightings of the peregrine falcon, whose preferred prey is pigeons.<sup>366</sup> This implies that these Exempted Birds play a crucial role in enhancing the biodiversity in Singapore, and indiscriminate culling (without scientific justification) may result in the decline of these species which may have an adverse impact on Singapore's ecological landscape. Predation and ingestion of poisoned birds from culling exercises can also lead to death of such rare migrant species.
59. In addition, the artificial removal of one species may introduce a vacuum, whereby the population of other "pest" or scavenger animals may increase as a result of the available food sources stemming from the mass removal of the Exempted Species. The Javan myna's diet, for instance, is an omnivorous urban diet of insects, maggots (from food waste/carrions), dead animal matter, cockroaches, human food waste, geckos, and other so called "pest species". Likewise, the presence of house crows performs an important ecological role to clean up waste such as carcasses or other decaying matter that may attract vermin and flies. Without proper analysis, scientific study, and targeted solutions, indiscriminate culling is likely to present more problems for urban waste management and may even lead to the population increase of other animals like rodents, who pose proven zoonotic risks in urban centres.
60. It is crucial to remember that each of these species play their own role in the ecosystem, like the house crow which was introduced to this region as a biological control agent for caterpillars. The house crow is also almost exclusively parasitised<sup>367</sup> by the Asian koel, and the decline in the house crow population may lead to the Asian koels potentially parasitising other native species,<sup>368</sup> such as the black-naped oriole. Unlike crows, black-naped orioles and other native birds are more solitary or in pairs, making them less equipped to deter brood parasitism effectively. Such delicate dynamics in our urban ecosystem requires careful planning to strike a balance in their populations naturally.
61. Furthermore, the culling of the Exempted Birds may pose devastating consequences for other non-exempted animals in the vicinity. In 2021, a white bellied sea-eagle, which had likely consumed a poisoned pigeon (as it regurgitated pigeon parts during the treatment, and ACRES had rescued poisoned pigeons at the same estate on the same night), collapsed outside the Supreme Court and had to be treated before being released back into the wild.<sup>369</sup> Between 2021 and 2022, ACRES also rescued 1,000 poisoned birds, including protected species such as spotted doves, koels, and black-naped orioles.

<sup>364</sup> Chong, K. Y., Teo, S., Kurukulasuriya, B., Chung, Y. F., Rajathurai, S., Haw, C. L., & Tan, H. T. W. (2012). Decadal changes in urban bird abundance in Singapore. *The Raffles Bulletin of Zoology*, 25, 189–196. <https://lcnhm.nus.edu.sg/wp-content/uploads/sites/11/app/uploads/2017/06/s25rbz189-196.pdf>

<sup>365</sup> Ibid.

<sup>366</sup> Capoccia, S., Boyle, C., & Darnell, T. (2018). Loved or loathed, feral pigeons as subjects in ecological and social research. *Journal of Urban Ecology*, 4(1), 1–6. <https://doi.org/10.1093/jue/juy024>

<sup>367</sup> Wee, Y. C. (2013, January 13). Less house crows... More Asian Koels... Bird Ecology Study Group. <https://besgroup.org/2013/01/13/less-house-crows-more-asian-koels/>

<sup>368</sup> Chong, K. Y., Teo, S., Kurukulasuriya, B., Chung, Y. F., Rajathurai, S., Haw, C. L., & Tan, H. T. W. (2012). Decadal changes in urban bird abundance in Singapore. *The Raffles Bulletin of Zoology*, 25, 189–196. <https://lcnhm.nus.edu.sg/wp-content/uploads/sites/11/app/uploads/2017/06/s25rbz189-196.pdf> (at 190).

<sup>369</sup> Haw, S. (2021, July 27). White-bellied sea eagle, likely to have eaten poisoned pigeon, collapses outside Supreme Court. Mothership. <https://mothership.sg/2021/07/poisoned-eagle-rescued/>



62. The removal of the purple-backed starling and Philippine glossy starling from the WE Order sets further precedent as to why the Exempted Birds should be removed from the schedule of the WE Order. Historically, the two species were included in the exempted bird species as they were considered to be an agricultural nuisance with gregarious feeding behaviours. However, there is no record of why these species in particular were removed from the WE Order. If their removal was for arbitrary reasons even if they were considered “nuisances”, all the more the Exempted Birds should be removed from the WE Order unless there is a compelling reason to retain them.
63. The implementation of a system whereby the DG’s approval is sought before such culling can be carried out would ensure that comprehensive studies are conducted on the impact of the culling exercise on the natural environment.
64. If the conclusion is that culling is absolutely necessary, Recommendation 14 introduces the element of accountability to the DG whereby the individual has to observe and report on the impact (whether positive or negative) of the culling exercise afterwards. This would facilitate the data collection and analysis of the relevant agencies or organisations to determine the effectiveness of the culling and whether there can be alternative solutions to address the public’s concerns while causing minimal disruption to the natural environment.

***Recommendation 14 will align with public sentiments and international consensus on ethical wildlife management practices.***

65. International studies<sup>370</sup> on human-wildlife conflict management practices acknowledge that these conflicts stem from human activities such as habitat alteration, food source creation, or species introduction, and should be addressed by modifying human behaviours and practices first. **International consensus principles on ethical wildlife control** developed after a two-day workshop with experts concluded that wildlife management practices should:
  - a. **Justify control measures with evidence** of significant harm to people, property, livelihoods, ecosystems, and/or other animals
  - b. Establish clear, achievable, measurable, and adaptable outcome-based objectives
  - c. Minimise animal welfare impacts by limiting harm to the fewest number of animals
  - d. **Incorporate community values** along with scientific, technical, and practical knowledge
  - e. Integrate measures into systematic, **long-term** management plans
  - f. Tailor actions to the specific situation, **avoiding negative labelling of species** (e.g. “pest” or “overabundant”)
66. The move away from culling as a wildlife management practice not only aligns with evolving ecological understanding but also resonates strongly with public sentiments in Singapore. During the 2018 public consultation on the Wild Animals and Birds Act (WABA) review, **61% of**

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<sup>370</sup> Dubois, S., Fenwick, N., Ryan, E. A., Baker, L., Baker, S. E., Beausoleil, N. J., Carter, S., Cartwright, B., Costa, F., Draper, C., Griffin, J., Grogan, A., Howald, G., Jones, B., Littin, K. E., Lombard, A. T., Mellor, D. J., Ramp, D., Schuppli, C. A., & Fraser, D. (2017). International consensus principles for ethical wildlife control. *Conservation Biology*, 31(4), 753–760. <https://doi.org/10.1111/cobi.12896>

**respondents expressed support for protecting all wild birds,**<sup>371</sup> including crows, mynas, and pigeons, from killing, keeping, or capturing without a permit. Respondents cited values of compassion, stating that "all life should be protected and respected". Some proposed that any such activities should require strict permitting to ensure humane and justified actions are taken. These findings reflect a growing recognition of ethical considerations in wildlife management among the public.

67. In 2021, when reports of mass poisoning of pigeons in Yishun was published,<sup>372</sup> involving nearly 30 pigeons found dead or dying near HDB blocks, it sparked widespread condemnation with residents describing the practice as "sad and inhumane". Similarly, in the 2015 ACRES survey,<sup>373</sup> **over 80% of respondents opposed the culling of stray animals** including wildlife, reflecting a preference for non-lethal, humane solutions to urban wildlife challenges.
68. Community initiatives illustrate the public's preference for humane treatment of wildlife. Residents have taken active measures, such as starting petitions and reaching out to media and Members of Parliament, advocating for humane approaches to urban bird population management.<sup>374,375</sup>

***Recommendation 14 will ensure coordination between persons conducting population control.***

69. From the discussion of the studies above (inter alia, the 2000 to 2001 Study, the 2010 to 2011 Study, and the Circuit Breaker Study), it appears to be a unanimously held view that culling exercises are not effective as a standalone practice. Rather, even in situations where culling has been acknowledged as an effective means of population control, they are generally effective only when employed as part of a **coordinated, multifaceted approach** along with other means of population control.
70. In other words, even if culling is ultimately necessary, Singapore's past experience, as well as the experience of other countries, makes it clear that **culling exercises significantly benefit from centralised coordination**. This is something that Parliament and the Minister for National Development have recognised on multiple occasions over the past decades.
71. The importance of coordination of any population control exercise for the Exempted Birds raises the question of **whether a specific exemption in the form of the WE Order is even necessary in the first place**, when the effect of such an exemption is to, quite literally, make it open season for the Exempted Birds indefinitely.
72. The Committee's view is that from an operational perspective, this is unnecessary, excessive, and counterproductive. The broad scope of the WE Order essentially means that any person can kill, trap, or take the Exempted Birds and face no consequence under Section 5C of the Wildlife Act, regardless of their reasons for doing so. However, a laissez-faire or ad-hoc approach to culling is not effective, as evidenced by the Yemeni Aden experience discussed by Brook et al. (2003), where

<sup>371</sup> National Parks Board. (2018). *Proposed amendments to the Wild Animals and Birds Act*. <https://www.reach.gov.sg/latest-happenings/public-consultation-pages/2018/proposed-amendments-to-the-wild-animals-and-birds-act>

<sup>372</sup> Feng, Z. (2015, April 6). *Only a minority of Singaporeans want stray animals to be culled: Survey*. The Straits Times.

<sup>373</sup> Koh, S. (2023, May 31). 'Sad and inhumane': Yishun resident finds nearly 30 pigeons, most of them dead, lying near HDB blocks. The Straits Times. <https://str.sg/iJti>

<sup>374</sup> Mohamed Ismail, S. R. (2021, May 4). *Protect our wildlife birds: Crows, pigeons, mynahs*. <https://www.change.org/p/acres-protect-our-wildlife-birds-crows-pigeons-mynahs>

<sup>375</sup> Lee, M. (2024, June 6). *Petition to implement humane pigeon population control measures in Singapore*. <https://www.change.org/p/petition-to-implement-humane-pigeon-population-control-measures-in-singapore>

a failure to coordinate a population control exercise between cities simply meant that the crow population in Aden was replaced by the crows from neighbouring cities. Singapore's efforts to control the population of crows between the 1970s and 2000s also evidence this. While the government had taken efforts to suppress the house crow population through shooting during this time, prior to the study carried out by Brook et al. (2003) and the implementation of the recommendations therein, the house crow population still increased thirty-fold from the 1970s to the year 2000 despite these efforts<sup>376</sup> due to a lack of coordination.<sup>377</sup>

73. The need for coordination in population control for the Exempted Birds, as well as direct population control, makes it particularly appropriate to subject culling exercises to DG approval.
74. **First**, such an approach would facilitate centralised coordination of pigeon control efforts. In June 2024, it was reported that NEA, SFA, and NParks would work with three adjacent Town Councils on a variety of measures to bring down the numbers of feral pigeons. As observed in a news article on these pigeon control efforts, "A more coordinated approach... would likely be more impactful. The pigeons don't respect town council boundaries – they'll move across all the nearby areas looking for food."<sup>378</sup>
75. In Parliament, it has frequently been said that NEA, NParks, and SFA work together with Town Councils to manage the populations of the Exempted Birds and carry out culling exercises. However, the effect of the WE Order is that there is really no obligation on Town Councils, or any other persons, to participate in this collaborative process. The same goes for the other stakeholders in this process, such as hawkers' associations, managing agents and operators of food shops, as well as cleaning contractors. Should any of these stakeholders decide not to cooperate with the NEA, NParks, and SFA, and instead resort to ineffective, inhumane, and uncoordinated culling efforts against the Exempted Birds, there would be little in their way.
76. It has been said in relation to NEA, SFA, and NParks' pilot study that began in June 2024 that the "results of the pilot will be assessed in early 2025. If found to be effective, it will be considered for islandwide implementation."<sup>379</sup> Should an island-wide programme for the population control of the Exempted Birds come to fruition, that would make the need for centralised coordination even more important.
77. **Second**, if all exercises involving the killing, trapping, or taking of the Exempted Birds were subjected first to DG approval, this would enable better data collection and tracking of population control efforts by the relevant authorities. Central oversight by the DG would allow for monitoring of culling activities including the methods used, the number of birds affected, and the specific locations of these activities. Such data is arguably invaluable for assessing the effectiveness of population control measures, understanding the impact on the ecosystem, and making informed decisions on future strategies, and would provide the relevant authorities with another data point to

<sup>376</sup> Chong, K. Y., Teo, S., Kurukulasuriya, B., Chung, Y. F., Rajathurai, S., Haw, C. L., & Tan, H. T. W. (2012). Decadal changes in urban bird abundance in Singapore. *The Raffles Bulletin of Zoology*, 25, 189–196. <https://lcnhm.nus.edu.sg/wp-content/uploads/sites/11/app/uploads/2017/06/s25rbz189-196.pdf> (at 190).

<sup>377</sup> Brook, B. W., Sodhi, N. S., Soh, M. C. K., & Lim, H. C. (2003). Abundance and projected control of invasive house crows in Singapore. *The Journal of Wildlife Management*, 67(4), 808–817. <https://doi.org/10.2307/3802688> (at 809).

<sup>378</sup> Wong, E. (2024, June 25). *Pigeon control efforts to be stepped up in Ang Mo Kio, Bishan-Toa Payoh and Tanjong Pagar*. The Straits Times. <https://str.sg/mPrX>

<sup>379</sup> Ibid.

base their decisions on. It would also reduce the risk of unintended consequences such as the disturbance of non-target species or habitats.

78. The sum of the above is that, even from an operational perspective, there is no compelling reason to have a specific carveout for the Exempted Birds in the form of the WE Order. The scientific literature and academic discourse have consistently advocated for a coordinated, multifaceted approach, which is best facilitated through the DG's oversight under the Wildlife Act.
79. The effect of the WE Order is arguably that persons can do as they please with the Exempted Birds, with no obligation to report or justify themselves to any authority. This appears to run contrary to the evidence-based, holistic, and scientific approach that has been extolled.

***Recommendation 14 is aligned with Recommendation 3 which aims to improve animal welfare and reduce unnecessary suffering.***

80. As set out above, it is not persuasive that culling should be resorted to as the primary means to control the population of the Exempted Birds. In the recent past, owing to public sentiment regarding the methods of culling and advocacy by animal welfare groups, there have been suggestions put forth regarding more humane methods of depopulation. Some of the more feasible proposals are set out below.
81. Removing the Exempted Birds from the WE Order will compel persons controlling their populations to ensure that the highest standards of animal welfare are adhered to and that there is minimum disruption to the surrounding ecosystem. This may include, inter alia, implementing the following humane approaches and principles when killing the Exempted Birds for disease control purposes or public health concerns:
  - a. Ensuring that all personnel involved have the relevant skills and competencies, which may be gained through formal training and/or practical experiences
  - b. Employing methods in accordance with established veterinary guidelines that would result in immediate death or immediate loss of consciousness lasting until death. When loss of consciousness is not immediate, induction of unconsciousness should be non-aversive or the least aversive possible and should not cause avoidable anxiety, pain, distress, or suffering in animals.
  - c. Killing infected animals first, followed by in-contact animals, and then the remaining animals
82. There have been other proposed methods of population control in place of culling exercises, some of which have already been implemented, such as food waste management and design by SFA and NParks. Some of these alternative proposals are set out as follows:
  - a. **Food waste management and design**

It is commendable that SFA and NParks have joined forces to better manage the food tray return stations in eateries.<sup>380</sup> However, more long-term effort is needed to ensure appropriate

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<sup>380</sup> Yap, Y. H. (2024, June 25). *Pigeon culling, food waste management to be stepped up under pilot action plan across 3 town councils*. Mothership. <https://mothership.sg/2024/06/pilot-pigeon-management-action-plan/>

user behaviour and stowage in an area away from where the birds can reach. Bin centres are frequented by crows, pigeons, and mynas, in addition to rats. Increasing cleaning frequency and ensuring that all bin centres are covered with bird proofing are also essential to minimise food sources to the rodents and these three bird species.

Design elements for all future eateries and those undergoing renovation should incorporate these measures<sup>381</sup>: (i) Placement of tray return shelf deeper inside the establishment and not in the periphery where birds have easy access, (ii) Exclusion measures such as netting/mesh to prevent entry to birds, (iii) Avoid perching beams in design or implement perch-deterrent elements such as slippery and sloped surfaces that prevent birds from perching and having vantage view of food sources, and (iv) Prevent nesting opportunities on aircon compressors, expressways, MRT tracks, and under bridges.

#### **b. Active egg swapping for pigeon lofts**

Establishment of carefully designed pigeon lofts can be piloted in selected estates by identifying suitable sites with minimal human traffic and preference by pigeons, such as terraces of multi-storey HDB carparks.

After trying several methods such as culling, exclusion, and others, in May 2024 a dovecote was opened on the roof of the City of Brno's Department of Urban Planning and Development on Kounicova.<sup>382</sup> This project was launched, supported by the success of other dovecotes in the city. Pigeon eggs will be removed and replaced with dummy eggs to contain their reproduction cycle, with the help of community and NGO volunteers.

In 2021, Zizkov district in Prague installed a pigeon loft to replace eggs and control the pigeon population in the city, in a bid to move towards humane pigeon management.<sup>383</sup>

For decades, Germany has implemented humane ways to control the pigeon population. The pigeon loft at Hamburg Central Station<sup>384</sup> currently accommodates 150 to 200 pigeons at a time, which resulted in 800 pigeon chicks not hatching in 2020.

#### **c. Oral contraception**

In 2015, AVA trialled the use of oral contraceptives to control the pigeon population at the Palmer Road Mosque. Reports in 2016 indicated a 60–70% decline in population, as the population of the 400 birds there dropped to between 120 to 160. No further reports were found on this pilot and, with the current multi-pronged approach by NParks, this is a suitable period to launch a pilot using oral contraception with a long-term monitoring study. Studies have overwhelmingly concluded that culling feral pigeons is ineffective as a method to reduce pigeon abundance in the medium- and long-term, despite an initial short-term reduction in

<sup>381</sup> Haag-Wackernagel, D. & Geigenfeind, I. Protecting buildings against feral pigeons. *European Journal of Wildlife Research*, 54, 715–721. <https://doi.org/10.1007/s10344-008-0201-z>

<sup>382</sup> Benigni, V. (2024, May 31). *Brno's first dovecote opens on roof of city's planning department building*. Brno Daily. <https://brnodaily.com/2024/05/31/brno/brnos-first-dovecote-opens-on-roof-of-citys-planning-department-building/>

<sup>383</sup> Fraňková, R. & Hroch, J. (2021, March 8). *Prague plans to install its first urban pigeon loft – and steal their eggs*. Radio Prague International. <https://english.radio.cz/prague-plans-install-its-first-urban-pigeon-loft-and-steal-their-eggs-8724787>

<sup>384</sup> Kantenwein, L. & Haßlberger, L. (2023, May 3). *Hamburg's long path to pigeon protection*. Kopfzeile Studierendenmagazin. <https://kopfzeilemagazin.com/2023/05/03/hamburgs-long-path-to-pigeon-protection-2/>

numbers.<sup>385,386,387</sup> Studies have also shown that pigeon culling strategies have a short-term effect as their recovery potential is strong, resulting in an increase in pigeon population in the long-term.<sup>388</sup> Hence, there is also an economic aspect — it may be the case that ad-hoc culling as a means of feral pigeon population control is not the most efficient use of public funds. Even though humane measures may involve an initial capital cost, due to the long-term nature of the impact on the pigeon population, funds are optimally utilised.<sup>389</sup>

In Barcelona, Spain, the management of feral pigeons was historically conducted through capture and elimination, a practice common in many urban areas. However, as this approach proved ineffective and public concern for animal welfare grew, the Barcelona City Council adopted a fertility control method using an adapted palatable version of a species-specific oral contraceptive in 2016. Over a three-year study,<sup>390</sup> this method successfully reduced pigeon numbers in treated colonies by 55.26%. These findings have been crucial in offering animal management organisations and businesses a humane, non-lethal protocol for controlling pigeon populations while addressing animal welfare considerations.

Oral contraceptives for pigeons are proven to be not only effective but also safe to other members in the ecosystem, compared to the currently used alpha-chloralose or rodenticides in the environment. To produce any toxic effects, non-target mammals (including humans) would have to consume large amounts of the product. Based on the rat acute oral LD50 toxicology data, to cause lethal effects in 50% of the population, an acute single ingestion for a 15kg child or a 10kg dog would have to exceed 60kg and 40kg of bait, respectively.<sup>391</sup>

The cost of implementing the fertility control method using Ovistop® to manage pigeon populations in urban areas during the study period totalled EUR 387,143 (approximately SGD 566,694). In comparison, the average yearly cost of the capture and elimination method previously used in Barcelona was EUR 90,000 (SGD 131,721) per year, amounting to EUR 270,000 (SGD 395,163) over the same three-year period.<sup>392</sup> While the capture and elimination method incurs ongoing annual expenses, the fertility control approach sees reduced costs over time as the number of pigeons requiring treatment declines. This makes fertility control a more sustainable and cost-effective solution in the long term. Due to lack of publicly available information on funds expended for culling of exempted species in Singapore, the Committee is unable to provide a cost benefit analysis for the local context.

Effective population management requires a combination of strategies rather than reliance on a single method. Lethal control alone has proven ineffective, as it often leads to increased

<sup>385</sup> Haag-Wackernagel, D. (1995). Regulation of the street pigeon in Basel. *Wildlife Society Bulletin*, 23(2), 256–260. <https://www.jstor.org/stable/3782800>

<sup>386</sup> Giunchi, D., Albores-Barajas Y. V., Baldaccini N. E., Vanni, L., & Soldatini C. (2012). Feral pigeons: Problems, dynamics and control methods. In M. L. Larramendy & S. Soloneski (Eds.), *Integrated Pest Management and Pest Control – Current and Future Tactics*. InTech. <https://www.intechopen.com/chapters/29607>

<sup>387</sup> Pigeon Control Advisory Service. (n.d.). *Why lethal bird control fails*. [http://www.picasuk.com/why\\_lethal\\_bird\\_control\\_fails.html](http://www.picasuk.com/why_lethal_bird_control_fails.html)

<sup>388</sup> Pellizzari, M. & Loughlin, D. (2017). Controlling urban pigeon populations humanely. In M. P. Davies, C. Pfeiffer, & W. H. Robinson (Eds.), *Proceedings of the Ninth International Conference on Urban Pests*. <https://www.icup.org.uk/media/42unjh30/icup1202.pdf>

<sup>389</sup> González-Crespo, C. & Lavín, S. (2022). Use of fertility control (nicarbazin) in Barcelona: An effective yet respectful method towards animal welfare for the management of conflictive feral pigeon colonies. *Animals (Basel)*, 12(7), 856. <https://doi.org/10.3390/ani12070856>

<sup>390</sup> Ibid.

<sup>391</sup> United States EPA. Office of Prevention, Pesticides and Toxic Substances. (2005, November). *Pesticide fact sheet: Nicarbazin*. [https://www3.epa.gov/pesticides/chem\\_search/reg\\_actions/registration/fs\\_PC-085712\\_01-Nov-05.pdf](https://www3.epa.gov/pesticides/chem_search/reg_actions/registration/fs_PC-085712_01-Nov-05.pdf)

<sup>392</sup> González-Crespo, C. & Lavín, S. (2022). Use of fertility control (nicarbazin) in Barcelona: An effective yet respectful method towards animal welfare for the management of conflictive feral pigeon colonies. *Animals (Basel)*, 12(7), 856. <https://doi.org/10.3390/ani12070856>



recruitment within the population and immigration from neighbouring groups. Integrating a reproductive inhibitor can reduce recruitment, limiting population recovery following lethal measures.<sup>393</sup> Additionally, reducing these birds' access to food is essential for lowering carrying capacity and increasing the effectiveness of baited reproductive inhibitors. A multifaceted approach that combines population reduction, reproductive suppression, and food restriction is key to long-term success.

83. Thus, the removal of the four birds from the Exemption schedule would improve their welfare, even if culling were to be used as a last resort for the purposes of the ecosystem and public health, by fiat of requiring the DG's approval and, by extension, the DG's oversight. This would also encourage a more scientific and evidence-based approach towards population management and especially culling of identified wildlife species, which forms the basis of a compassionate society navigating increasing human-wildlife conflicts amidst rapid urbanisation and global population increases (Ma et al., 2024).<sup>394</sup> Chun (2020) noted that during the parliament debate on the Wild Animals and Birds (Amendment) Act, it was discussed that "the exemption of pest bird species will be reviewed at a later stage".<sup>395</sup> Hence, this proposal argues that the removal of the birds from the Exemption schedule will represent a compassionate stance underpinned by a strengthened duty of care though the gatekeeping mechanism of the powers conferred upon the DG.
84. A concerted effort to ensure a more holistic, humane approach does not only benefit the Exempted Birds but also promotes the safety and wellbeing of those involved in culling exercises. Those who work in the pest and facilities management sector are often most at risk as they provide the cleaning services to remove pigeon faeces. Conducting proper training on welfare, humane treatment, and disposal is important, and subjecting the killing, trapping, or taking of the Exempted Birds to the prior written consent of the DG will ensure that, at the very least, the DG may oversee and ensure that those participating in such processes are properly trained.

***Even if the Exempted Birds cannot be removed from the WE Order, the WE Order should include a self-reporting mechanism for a person to qualify for the exemptions therein.***

85. Even if the Exempted Birds cannot presently be removed from the WE Order, the WE Order should include a self-reporting mechanism for any persons intending to utilise the exemptions concerning the Exempted Birds.
86. Specifically, any person or organisation engaging in the killing, trapping, or taking of the Exempted Birds must produce a report to the effect that they are satisfied that:
  - a. On the evidence (i.e. scientific evidence such as ecosystem impact assessments, evidence of actual risks, and whether humane measures have been tried and did not work, hence the resort to depopulation), it is necessary for the person to kill, trap, or take the Exempted Birds
  - b. The methods the person intends to employ for killing, trapping, or taking the Exempted Birds prevent or reduce unnecessary animal suffering

<sup>393</sup> Avery, M. L., Keacher, K. L., & Tillman, E. A. (2008). Nicarbazin bait reduces reproduction by pigeons (*Columba livia*). *Wildlife Research*, 35, 80–85. <https://doi.org/10.1071/WR07017>

<sup>394</sup> Ma, D., Abrahms, B., Allgeier, J., Newbold, T., Weeks, B. C., & Carter, N. H. (2024) Global expansion of human-wildlife overlap in the 21<sup>st</sup> century. *Science Advances*, 10(34), 1–8. <https://doi.org/10.1126/sciadv.adp7706>

<sup>395</sup> Singapore Parliamentary Debates. (2020, March 25). *Official Report vol 94*. Louis Ng Kok Kwang, Member of Parliament for Nee Soon GRC.

87. These records should be kept by the person or organisation and thereafter be liable to be audited by the relevant authorities. If evidence arises of unnecessary suffering or needless culling, inadequate or unsatisfactory records could form the basis for prosecution under Section 5C of the Wildlife Act itself, or form the basis of an adverse inference drawn against a person who has failed to keep relevant records in a prosecution under Section 42 of the Animals and Birds Act.
88. The Committee is not seeking an absolute prohibition against direct population control of the Exempted Birds, but that measures be taken to ensure that culling exercises against the Exempted Birds are grounded in scientific research, data, and necessity, rather than being arbitrary or reactionary measures. Where culling is absolutely necessary, it should be done in a humane and safe manner that prevents or reduces unnecessary suffering.
89. While the Committee is of the view that the removal of the Exempted Birds from the WE Order would be the most straightforward approach to effect these measures, if that is not possible, then the introduction of conditions and self-reporting requirements could provide a balanced approach that ensures both accountability and transparency from persons carrying out direct population control exercises against the Exempted Birds, and may similarly promote responsible management practices and the meticulous collection of data on the outcomes of culling exercises.
90. It may also encourage stakeholders to, at the very least, apply their minds to whether there are more humane and less extreme approaches to any issues related to the Exempted Birds.
91. In the circumstances, even if the four Exempted Birds cannot be removed from the WE Order, the Committee recommends that the WE Order be amended to include the self-reporting requirement set out above. This approach may also promote responsible and ethical wildlife management, ensuring interventions are necessary, justified, and carried out in a manner that minimises harm to both the animals and the ecosystem.

***The common myna should, in any event, be removed from the WE Order.***

92. Even if Recommendation 14 is not adopted in the main, the Committee recommends that the common myna should, in any event, be removed from the WE Order. There does not appear to be any scientific justification for the retention of common mynas in the WE Order, bearing in mind that they are a native species whose population has decreased substantially over the years and who have experienced a great loss of their preferred rural and agricultural habitat.

***Conclusion on Recommendation 14***

93. The WE Order is rooted in a concept that first arose in the 1884 and 1904 Ordinances, at a time when hunting seasons and unregulated wildlife exploitation were common. In the Committee's view, these historical frameworks have become an anachronism, at least in relation to the Exempted Birds. In today's context, such exemptions no longer appear consistent with the purposes of maintaining a healthy ecosystem while addressing public health and safety concerns.

**Recommendation 15:**

**Regulate the sale and use of glue traps**

1. The Committee recommends banning the sale and use of glue traps to catch rodents except by persons licensed to use rodent glue traps, in which case the licensed person would be subject to strict conditions for its use. Recommendation 15 entails, inter alia, the following:
  - a. Prohibiting the sale of rodent glue traps to the general public
  - b. Prohibiting the setting and use of rodent glue traps by the general public
  - c. Restricting the sale and use of rodent glue traps to registered Vector Control Operators (“**VCOs**”), licensed Vector Control Technicians (“**VCTs**”), and certified Vector Control Workers (“**VCWs**”)
  - d. Incorporating the present guidelines on responsible use of glue traps (“**Guidelines**”, dated 15 May 2024) as conditions for registration, licensing, and certification, or as regulations
2. This can be accomplished via three changes to legislation and policy:
  - a. Introduce a new section in the Control of Vectors and Pesticides Act 1998 (“**CVPA**”) prohibiting the use, sale, and purchase of rodent glue traps, except for use by, sale to, and purchase by registered VCOs, licensed VCTs, and certified VCWs, with the suggested wording:

**Prohibition of sale, setting, or use of rodent glue traps**

X. — A person must not —

- (1) advertise, sell, supply, or offer for sale or supply any glue trap to any person other than a registered vector control operator, licensed vector control technician, or certified vector control worker under this Act
- (2) set or use any glue trap unless the person is a registered vector control operator, licensed vector control technician, or certified vector control worker under this Act

- b. Add or amend the following definitions in Section 2 of the CVPA (amendments underlined):

- i. “vector control work” means any work carried out for the purpose of vector control, and includes the use<sup>396</sup> of rodent glue traps
- ii. “rodent glue trap” means a trap which is designed, or is capable of being used, to catch a rodent, and uses an adhesive substance as the means, or one of the means, of capture,<sup>397</sup> but does not include any glue trap for the purposes of capturing insects if the trap—
  1. has a cage or other protection which prevents any rodent from contact with the adhesive surface, or

<sup>396</sup> “Use” is defined in Section 2 of the CVPA as including “any act of handling, operating, dispensing, preparation, application, storage and disposal”.

<sup>397</sup> Takes reference from the definition of “glue traps” in the English Glue Trap (Offences) Act 2022. The use of the word “rodent” is intended to set an implicit size limit — glue traps that are intended for insects, and that are not large enough to capture a rodent, would be excluded from the intended definition of rodent glue traps.

2. is designed to prevent the capture of an animal<sup>398</sup>
- c. Incorporate the present guidelines to pest control operators on the responsible use of rodent glue traps (dated 15 May 2024) as:
  - i. Conditions for each of the regimes for the registration of VCOs, licensing of VCTs, and certification of VCWs, or
  - ii. Regulations pursuant to Section 60 of the CVPA

### ***Introduction to Recommendation 15***

3. Glue traps, or glue boards, are traps that consist of a tray or board with a highly sticky adhesive typically used to trap rodents, insects, snakes, and other small creatures. Glue traps typically have no active ingredients or insecticides applied to them. The mechanism is simple and self-explanatory.<sup>399</sup> Glue traps are typically placed in areas where rodent or insect activity is suspected and where rodents and insects are most likely to walk past. Bait can be placed on the glue traps. Rodents or insects walk on the glue traps and get stuck on them.
4. Glue traps are unsophisticated and can be easily homemade with nothing more than a flat board and strong glue. Rat glue (typically a strong viscous adhesive) is readily available both online and in physical hardware stores. It can be applied on any flat or board-like surface to create a glue trap.
5. Proponents of glue traps have noted its effectiveness in controlling rodent populations. That being said, in recent years, the inherent cruelty of glue traps has attracted significant attention both in Singapore and worldwide. Unless they are attended to, animals caught in glue traps typically remain there until they die of starvation, suffocation, or dehydration. Animals who get caught on the glue traps often cry out in pain, and the adhesiveness of the glue traps is generally strong enough that fur and skin may be ripped off if the caught animals struggle hard. Some animals have also been observed to gnaw off their limbs in an effort to escape from the glue traps.
6. The scale of the problem is dramatic. There are a few hundred pest control companies in Singapore, and the volume of glue trap usage and the suffering this can bring to rodents and non-target animals is significant. Even though rats are considered pests and public health and safety must be upheld, they have also been recognised to be intelligent sentient beings.<sup>400</sup> As a society which strives to be a City in Nature, with values like compassion and coexistence interwoven in the foreground, we must find ways to reduce animal suffering as best as we can.
7. In addition, glue traps are indiscriminate and cause significant collateral damage to non-target populations. According to data collected by ACRES, between the years 2014 and 31 December 2023, a total of 1,852 trapped wild animals have been rescued by ACRES from glue traps, as set out in the table below:

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<sup>398</sup> Takes reference from the Victorian Prevention of Cruelty to Animals Regulations 2019 and makes explicit exclusion of glue traps for insects.

<sup>399</sup> The Humane Society of the United States. *Glue boards*. <https://www.humanesociety.org/resources/glue-boards>

<sup>400</sup> Balcombe, J. P. (2010). Laboratory rodent welfare: Thinking outside the cage. *Journal of Applied Animal Welfare Science*, 13(1), 77–88. <https://doi.org/10.1080/10888700903372168> (at 74-75).

#### AREA 4: WILDLIFE PROTECTION

Year	Protected species (Reptiles)	Protected species (Mammals)	Protected species (Birds)	Non-protected species of Birds (Pigeons, Mynas, Crows)	Total/Year
2014	1	1	11	20	33
2015	1	0	9	50	60
2016	2	2	22	93	119
2017	5	3	25	101	134
2018	7	4	27	114	152
2019	1	3	34	139	177
2020	7	8	35	149	199
2021	19	12	55	235	321
2022	14	12	67	264	357
2023	13	2	38	206	259
Total/Category	70	47	323	1,371	1,852

**Table 4:** Number of trapped wild animals rescued by ACRES from glue traps between 2014 and 2023.

8. Of these 1,852 animals rescued by ACRES, only 43 were animals traditionally targeted by glue traps — eight geckos and 35 rats. Protected species amounted to 440 of the 1,852 animals, or about 23.7% of the animals rescued by ACRES from the glue traps.
9. According to data collected by ACRES from 1 May 2024 on glue-trapped animals from its rescue log, members of the public have been observed to use glue traps to intentionally trap a non-target species, sometimes for trivial reasons such as playing pranks.
10. It is important to bear in mind that the above number includes only animals rescued by ACRES and is likely to represent only a subset of the actual number of non-target wildlife caught in glue traps, as there is no available data from pest control operators or other wildlife rehabilitation facilities such as NParks and Mandai Nature. Up to 73% of cases each month are deemed inconclusive due to inadequate information<sup>401</sup> — the public availability of glue traps results in no transparency about who placed the traps or where they were placed. This often occurs when the caller finds only the affected animal, the animal was passed between people, or the trap was discovered in an open area with no identifiable source. Furthermore, the data excludes cases handled by the many pest

<sup>401</sup> Based on ACRES data since May 2024.

control operators in Singapore, other organisations like the SPCA and Mandai Nature, and veterinary clinics.

11. An outright ban on the sale and use of rodent glue traps by the general public would address poor public knowledge about the cruelty and risks of these devices. In ACRES's Public Perception Survey on Glue Traps of 1,000 residents in November 2023,<sup>402</sup> it was revealed that 40% of respondents claimed to have used glue traps before and 76% of respondents claimed to know what a glue trap is, with fewer than one in five being aware of its cons. Only 5% and 19% associated "indiscriminate" and "inhumane" with glue traps, respectively. 61% of the respondents would simply throw a live rat caught in the glue trap into the trash bin. Even if a non-target animal was caught, 48% would do the same and only 10% of the respondents would notify organisations like NParks, ACRES, or the SPCA.

#### **Present position and parliamentary discourse on glue traps in Singapore**

12. There is currently no prohibition against the use of glue traps in Singapore. Glue traps are readily accessible and freely sold to the general public, both in physical stores and online.
13. In 2012, the Agri-Food and Veterinary Authority ("**AVA**") first established guidelines on the responsible use of glue traps (the "**2012 Guidelines**"), developed in consultation with the pest control industry and the National Environmental Agency and issued to all pest management companies. Amongst other things, these guidelines specified the size of glue traps and the type of backing to be used to minimise the risk of trapping non-target animals.
14. The 2012 Guidelines subsequently underwent an update on or around 15 May 2024, after a revision by NEA, NParks, and the Singapore Pest Management Association. In its present iteration, the Guidelines set out, amongst other things, the following:
  - a. Glue traps should not be used in open areas or semi-open areas where there is concern that a non-target animal might be trapped. If a glue trap is used in an open area or semi-open area, there must be strong reasons to do so, such as the need to bring down the rat population quickly due to rat infestation, and an appropriate cover must be used over the glue trap to prevent a non-target animal from being trapped. Site assessment must be conducted and documented clearly to justify the need for deployment of glue traps.
  - b. The glue traps should not be larger than 35cm by 25cm in size and should not be deployed adjacent to one another in open/semi-open areas or where there is a concern that a non-target animal might be trapped.
  - c. The glue should be laid on a stiff backing to prevent the animal from being encased in the trap.
  - d. Once a glue trap is set, the pest control operator is to give specific written instructions to the client to notify them if an animal is caught and advise the client to check the trap daily. Upon notification, the pest control operator must collect or rescue any animal caught in the trap (both targeted and non-targeted) within **3 hours**.

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<sup>402</sup> Begum, S. (2024, May 21). *Glue traps for pests can't be used in outdoor areas where wildlife can get caught*. The Straits Times. <https://str.sg/oYahT>



15. Parliamentary discourse on glue traps in Singapore has generally tried to strike a balance between the effectiveness of glue traps and the cruelty that is inherent in these traps, by way of the Guidelines. This issue has been raised twice in Parliament between 2022 and 2024.
16. In the sitting on 4 April 2022, the Minister for Sustainability and the Environment was asked (a) whether glue traps for pests and rodents will be banned for use given the possibility of catching unintended targets after deployment, and (b) whether the Ministry will consider phasing out the practice of glue traps to catch pests and introducing nature-based biocontrols to tackle the problem.
17. The response by the Minister was that:

“When used responsibly and safely, glue traps are an effective tool for trapping and removing rodents. To minimise the risk of non-target animals being trapped by glue traps, NParks, in consultation with NEA and the Singapore Pest Management Association (SPMA), had issued guidelines to PCOs on the responsible use of glue traps.

NParks, NEA and SPMA will review these guidelines from time to time.”
18. In the sitting on 8 May 2024, immediately before the issuance of the updated Guidelines, the Minister for Sustainability and the Environment was asked whether the Ministry would consider regulating the use of glue traps and having measures in place to ensure that cats and wild animals are not caught in such traps.
19. The Minister’s response reiterated the efficacy of glue traps as a tool for trapping and removing rats when used responsibly and safely. In addition:

“The then-Agri-food and Veterinary Authority, in consultation with the National Environment Agency (NEA) and the Singapore Pest Management Association (SPMA), had issued guidelines to Pest Control Operators (PCOs) on the responsible use of glue traps. These include proper placement, limiting the sizes of traps and the appropriate response time for PCOs to attend to trapped animals.

The National Parks Board (NParks), NEA and SPMA are currently reviewing the guidelines in consultation with animal welfare groups to reduce the likelihood of non-target animals being trapped and to render quicker assistance should they be accidentally trapped. When ready, the revised guidelines will be issued to the PCOs and published online.”
20. As at September 2024, the Guidelines have been distributed to VCOs, but they have not been made available to the general public.

**Recommendation 15 has been adopted in numerous jurisdictions.**

21. The sale and use of glue traps has been banned or regulated in a number of jurisdictions including New Zealand, Wales, the United Kingdom, the state of Victoria in Australia, as well as numerous states in India such as Delhi,<sup>403</sup> Telangana,<sup>404</sup> and Arunachal Pradesh.<sup>405</sup>

**a. New Zealand**

In New Zealand, Section 32 of the Animal Welfare Act 1999 (“**AWA**”) generally provides the Governor-General with the power to, from time to time and on the advice of the Minister tendered after consultation with the National Animal Welfare Advisory Committee (“**NAWAC**”), declare any trap or device to be a prohibited or restricted trap or device, by way of an Order in Council.<sup>406</sup>

Pursuant to his powers under Section 32 of the AWA, the Governor-General enacted the Animal Welfare (Glueboards Trap) Order 2009 (“**AWGTO**”), an Order in Council declaring glueboard traps to be restricted traps.<sup>407</sup>

Commercial operators, Department of Conservation staff, boat operators to and from pest-free islands, and pest management staff at food processing premises were given a five-year phase out period between 1 January 2010 and 31 December 2014.<sup>408</sup>

Since 1 January 2015, no person may sell or use a glueboard trap unless the sale or use is pursuant to and in accordance with the conditions of an approval given by the Minister for the Ministry of Primary Industries (“**MPI**”). Applications must be made to the Director-General of MPI, and a case-by-case assessment will be undertaken.<sup>409</sup>

Ministerial approval is only granted when the sale or use of glueboards is in the public interest and there is no viable alternative. It may also be subject to conditions such as a specified duration, area, or number of traps, as well as the specified make, type, or size of the trap.<sup>410</sup>

A failure adhere to the AWGTO is an offence under Sections 34 or 35 of the AWA, punishable under Section 37 of the same Act<sup>411</sup>:

- In the case of an individual, to imprisonment for a term not exceeding 12 months or to a fine not exceeding \$50,000 or to both; and
- In the case of a body corporate, to a fine not exceeding \$250,000.<sup>412</sup>

<sup>403</sup> PTI. (2024, July 5). *Delhi markets stop sale of glue traps after PETA India's appeal*. The Indian Express. <https://indianexpress.com/article/cities/delhi/delhi-markets-stop-sale-glue-traps-peta-india-appeal-9435401/>

<sup>404</sup> Pandey, A. (2021, August 20). *Telangana govt prohibits manufacture, sale of glue traps for rodent control*. India Today. <https://www.indiatoday.in/india/story/telangana-govt-bans-manufacture-sale-glue-traps-for-rodent-control-1843323-2021-08-20>

<sup>405</sup> ET Online. (2023, September 3). *Arunachal Pradesh bans rat glue traps. Here's why*. The Economic Times. <https://economictimes.indiatimes.com/news/new-updates/arunachal-pradesh-bans-rat-glue-traps-heres-why/articleshow/103323855.cms?from=mdr>

<sup>406</sup> Animal Welfare Act 1999 (New Zealand). <https://www.legislation.govt.nz/act/public/1999/0142/latest/whole.html> (Section 32).

<sup>407</sup> Animal Welfare (Glueboard Traps) Order 2009 (New Zealand). <https://www.legislation.govt.nz/regulation/public/2009/0316/latest/DLM2439749.html> (Rule 4).

<sup>408</sup> Ibid, [Rule 5].

<sup>409</sup> Ibid, [Rules 8–10].

<sup>410</sup> Ibid, [Rule 8(3)].

<sup>411</sup> Ibid, [Rule 12].

<sup>412</sup> Animal Welfare Act 1999 (New Zealand). <https://www.legislation.govt.nz/act/public/1999/0142/latest/whole.html> (Section 37)

### Process of change

In New Zealand, Part 4 of the AWA established the NAWAC, a committee which, inter alia, advises the Minister on any matter relating to the welfare of animals in New Zealand, including legislative proposals.

According to a 2020 research report from Charity Entrepreneur, “there was never a formal campaign launched by animal advocacy groups. Instead, animal advocacy groups, including SAFE For Animals, made a submission against them when the National Animal Welfare Advisory Committee (NAWAC) was looking at these traps many years ago.”<sup>413</sup>

NAWAC recommended the banning of glue traps, and the Minister eventually acted on NAWAC’s advice of banning glue traps, although the entire process took almost a decade.

### Effectiveness

Evidence suggests that this approach in New Zealand has been very effective. Suppliers and distributors started trialling different kill trap options, including the use of remote monitoring to replace glue boards. The two biggest pest management companies that service most of NZ’s food supply chain commented that they have not had a requirement in 2021 to use glue boards at all, one saying they last used them in 2018.<sup>414</sup>

#### **b. Victoria, Australia**

The Australian state of Victoria has instituted a ban against the sale, setting, or use of glue traps, with a limited exception for glue traps for the purposes of capturing insects.

Section 42(1)(b) of the Prevention of Cruelty to Animals Act 1986 (“**Victorian PCAA**”) grants the Governor in Council the power to make regulations, amongst other things, with respect to traps, including but not limited to its nature, dimension, features, use, and purposes.

The Prevention of Cruelty to Animals Regulations 2019 (“**PCAR**”), enacted pursuant to Section 42 of the PCAA, came into operation on 14 December 2019. They replaced the previous Prevention of Cruelty to Animals Regulations 2008. Regulation 62 of the PCAR sets out a simple prohibition of the sale, setting, or use of glue traps:

#### **62 Sale, setting, or use of glue traps**

- (1) A person must not sell a glue trap capable of trapping an animal.
- (2) A person must not set or use a glue trap for the purposes of trapping an animal or that is capable of trapping an animal.
- (3) A person may sell, set, or use a glue trap for the purposes of capturing insects if the trap—
  - (a) has a cage or other protection which prevents any animal from contact with the adhesive surface, or
  - (b) is designed to prevent the capture of an animal

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<sup>413</sup> Cox, V. (2020, October). *Glue traps*. Charity Entrepreneur Research Report: Animal Welfare – Glue Traps 2020.

<sup>414</sup> Barry, P. (2021, August). *The glue board ban in New Zealand*. British Pest Control Association. <https://bpca.org.uk/test-news/ppc104-the-glue-board-ban-in-new-zealand/274397>

Glue traps are defined in the PCAR as “a trap that uses glue, adhesive material or any similar viscid substance as the mode of capture to trap an animal or insect”.<sup>415</sup>

The sale, setting, or using of traps that do not conform to Reg 62(3) of the PCAR are offences under Sections 15 and 15AB, respectively, of the Victorian PCAA, attracting a penalty of up to 240 penalty units or up to 2 years imprisonment for a natural person, and up to 1,200 penalty units in the case of a body corporate.<sup>416</sup>

### Process of change

According to a 2020 research report from Charity Entrepreneur, local NGO Animals Australia spent a number of years lobbying governments and advisory committees. At the time the PCAA came under review for any changes, stakeholders from a range of areas were permitted to make submissions regarding any area of the PCAA to Animal Welfare Victoria, the organisation that administers the PCAA. Recommendations were made to ban glue traps which were subsequently accepted by the Parliament.<sup>417</sup>

### Effectiveness

Since the ban on glue traps, it appears that the general public and pest control operators have now pivoted to using non-glue trap measures.

The Department of Health Victoria’s website now recommends non-glue trap rat control measures such as sanitation, exclusion, trapping (snap traps and multiple mouse-catching devices), and rodenticides.<sup>418</sup> The services provided by pest control companies include multiple types of baits used in each baiting programme to ensure there is no bait avoidance. These baits would appeal to different rodent tastes and make the overall treatment more palatable. Other pest control companies will use exclusive multi-dose bait which is applied in a powder form on top of exclusion measures. One company also suggested the use of natural ingredients such as onion peels and garlic.

### **c. Wales**

As at 17 October 2023, Wales has instituted an outright ban against the setting and use of glue traps. The enactment of this ban was achieved by way of an amendment to Section 11 of the Welsh Wildlife and Countryside Act 1981 (c. 69) (“**WCA**”).

Section 11 of the WCA originally set out prohibitions of certain methods of killing or taking wild animals, such as self-locking snares and the use of live mammals and birds as decoys.<sup>419</sup>

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<sup>415</sup> Prevention of Cruelty to Animals Regulations 2019. [https://content.legislation.vic.gov.au/sites/default/files/9cc60c2d-63c4-35b6-95ad-c39254a5d170\\_19-133sra%20authorised.pdf](https://content.legislation.vic.gov.au/sites/default/files/9cc60c2d-63c4-35b6-95ad-c39254a5d170_19-133sra%20authorised.pdf) [Reg 5].

<sup>416</sup> A penalty unit determines the quantum of the fine a person may receive as punishment. As at September 2024, the value of one penalty unit is AUD 197.69. See: Victoria State Government. (n.d.). *Penalties and values*. <https://www.justice.vic.gov.au/justice-system/fines-and-penalties/penalties-and-values>

<sup>417</sup> Cox, V. (2020, October). *Glue traps*. Charity Entrepreneur Research Report: Animal Welfare – Glue Traps 2020.

<sup>418</sup> Victoria Department of Health. (2023, February 16). *Rodents – pest control*. <https://www.health.vic.gov.au/environmental-health/rodents-pest-control>

<sup>419</sup> Wildlife and Countryside Act 1981 (2019 Rev Ed), UK, Section 11.

Via the Agriculture (Wales) Act 2023,<sup>420</sup> Wales introduced a number of extensive agriculture-related amendments, including the following amendments to Section 11 of the WCA (as well as other consequential amendments):

#### **46 Prohibition on use of snares and glue traps**

In Section 11 of the Wildlife and Countryside Act 1981 (c. 69) (prohibition of certain methods of killing or taking wild animals), in subsection (1)—

(a) after paragraph (b) insert—

...

(bc) sets in position in Wales any glue trap which is of such a nature and so placed as to be likely to catch any animal coming into contact with it;

(bd) uses in Wales for the purpose of killing or taking any animal any glue trap, whether or not of such a nature or so placed as aforesaid;”;

A person found guilty of using a glue trap can face imprisonment and/or an unlimited fine.

#### Process of change

The wholesale ban in Wales was enacted as a result of the Programme for Government commitment which conducted public consultations on the issue. In the lead-up to the ban, campaigns by animal welfare organisations and individuals saw large-scale support, with one Change.org petition reaching over 75,000 signatures. A YouGov poll in 2015 found that only 9% of respondents opposed a ban on glue traps.<sup>421</sup>

#### Effectiveness

Given the recency of the ban, there has not been significant data or information about the effectiveness of the ban thus far.

According to Welsh Rural Affairs Minister Lesley Griffiths, the use of snares and glue traps was “not compatible” with the expected standards of animal welfare in Wales. Together with other stakeholders and partners, they had been working towards this cause for a long time. She believes there are also many more humane ways to control rodents than through the use of glue traps. In her opinion, the banning of snares is about preventing inhumane methods being used and does not prevent predator control using other methods.<sup>422</sup>

That being said, the wholesale ban has drawn the harsh rebuke of the British Pest Control Association (BPCA).<sup>423</sup>

<sup>420</sup> Agriculture (Wales) Act 2023, UK. <https://www.legislation.gov.uk/asc/2023/4/contents>

<sup>421</sup> Llywodraeth Cymru (Welsh Government). (2022, November 29). *Summary of responses to targeted stakeholder consultation and call for evidence on glue traps*. <https://www.gov.wales/sites/default/files/publications/2022-12/targeted-stakeholder-consultation-glue-traps-summary-responses.pdf>

<sup>422</sup> Portillo, S. (2023, September 26). Animals to be 'spared suffering' as Wales bans snares and glue traps. South Wales Argus. <https://www.southwalesargus.co.uk/news/23811719-animals-spared-suffering-wales-bans-snares-glue-traps/>

<sup>423</sup> Professional Pest Controller. (2023, September 28). *BPCA pens open letter to the Minister for Rural Affairs ahead of the imminent Welsh glue board ban on 17 October*. <https://ppconline.org/features/bpca-pens-open-letter-to-welsh-minister-on-glue-board-ban>

d. **Indian states including Delhi, Telangana, and Arunachal Pradesh**

The manufacture, sale, and use of glue traps in India is a contravention of Section 11 of the Prevention of Cruelty to Animals Act 1960 ("**Indian PCAA**"), a general provision criminalising cruelty to animals similar to, but significantly more expansive than, Section 42 of Singapore's Animals and Birds Act.

The Animals Welfare Board of India ("**AWBI**") was instituted in 1962 pursuant to Chapter II of the Indian PCAA, for the promotion of animal welfare generally and for the purpose of protecting animals from being subjected to unnecessary pain or suffering. Its functions include (but are not limited to) keeping the law in force in India for the prevention of cruelty to animals under constant study and advising the Government on the amendments to be undertaken in any such law from time to time.

On or around 4 August 2011, AWBI issued a circular to the Chief Secretaries of all State and Union Governments, the Director General of Foreign Trade, and the Indian Pest Control Association (the "**2011 Circular**") setting out, inter alia, the following:

"Available evidence clearly suggests that the use of glue traps causes unnecessary pain and suffering to the rodents and is against the spirit of the Prevention of Cruelty to Animals Act 1960 specifically section 11 that deals with cruelty to animals generally, while there are many humane methods available to control the population of rats.

Therefore, the use of glue traps for controlling rats / rodents is in contravention of the provisions contained in the PCA Act 1960. Use of Glue traps is a cruel practice as such must be discontinued in favour of other humane methods / non invasive methods such as regulation rat traps.

I request the Director General of Foreign Trade to issue appropriate directions to ban the import of glue traps.

All State / Union Territory governments are requested to issue appropriate directions to prohibit the manufacture, sale and use of Glue traps for catching rats."

Given the AWBI's advisory role in the context of the Indian PCAA, the effect of the 2011 Circular was to render the use of glue traps a contravention of the Indian PCAA. That being said, the publication of this circular did not have immediate results.

Subsequently, on or around 16 November 2020, the AWBI reiterated its call for the issuance of directions to ban the use of glue traps by writing another letter to the Chief Secretaries of all State and Union Governments, the Director General of Foreign Trade, and the Indian Pest Control Association (the "**2020 Letter**"), requesting the issuance of appropriate directions to prohibit the manufacture, sale, and use of glue traps. The 2020 Letter provided, inter alia:

"... it has come to the knowledge of the AWBI that the Glue traps are still widely manufactured and sold across India. As requested in our circular dated 04.08.2011 no strict action has been taken to ban the import or stop the manufactures of this Glue traps and neither any such strong directions have been issued to restrains its manufacturing, use and sell.



3. In addition, it is stated that the use of Glue traps is a cruel reoccurring practice which is a continuing act by its user as they mostly use multiple traps and keep using them within a very short period for controlling rats/rodents which is in direct violation of Section 11 (1) of PCA Act, 1960 for which a person is liable to the punishment which may extend to one hundred rupees or with imprisonment for a term which may extend to three months, or with both for the second or subsequent offence, which in this case is almost always happening.”

This was followed up by an appeal from PETA India sometime before September 2023, which asked that advisories (viz. The 2011 Circular and the 2020 Letter) circulated by the AWBI against glue boards be implemented, and that the use of glue traps be prosecuted under Section 11 of the Indian PCAA.

Following this push from PETA India in 2023, at least 17 Indian states, including Delhi, Andhra Pradesh, Arunachal Pradesh, Chhattisgarh, Goa, Himachal Pradesh, Jammu and Kashmir, Karnataka, Ladakh, Lakshadweep, Madhya Pradesh, Meghalaya, Mizoram, Sikkim, Tamil Nadu, Telangana, Uttarakhand, and West Bengal, issued circulars requesting the immediate implementation of the AWBI's recommendation to ban the sale and use of glue traps.<sup>424</sup>

For a violation of the ban on glue traps, a first-time offender is punishable with a fine of between 10–50 rupees. A repeat offender (with previous offence committed within three years) is punishable with a fine of 25–100 rupees and/or up to three months' imprisonment.<sup>425</sup>

The implementation of the ban has had some immediate effect. PETA India appealed to Rajmandir Hypermarket, which runs 33 stores across Delhi, to stop the use of glue traps. It also called on all other retailers to do the same. In response, Rajmandir Hypermarket stopped buying and destroyed their stock of glue traps. They have also ceased the use, sale, and purchase of the glue traps. Following the government's direction and pressure from PETA India, e-commerce giants such as Amazon, Flipkart, and Meesho have also removed glue traps from their websites.<sup>426</sup>

#### e. United Kingdom

The United Kingdom enacted the Glue Trap (Offences) Act 2022 (“**GTOA**”) making certain uses of glue traps an offence. The GTOA also introduced a licencing regime for glue traps, authorising a pest controller to use glue traps, and granted constables and authorised representatives certain enforcement powers. Out of all the legislative approaches discussed in this section, the GTOA is the most comprehensive.

Section 1 of the GTOA makes the following an offence:

- The setting of glue traps in England for the purpose of catching rodents
- The setting of a glue trap in England in a manner that gives rise to the risk that a rodent will become caught in it

<sup>424</sup> Nandi, S. (2023, September 13). *Delhi government bans cruel glue traps in response to PETA India appeal*. PETA India. <https://www.petaindia.com/blog/delhi-government-bans-cruel-glue-traps-in-response-to-peta-india-appeal/>

<sup>425</sup> The Prevention of Cruelty to Animals Act, 1960, Section 11(1).

<sup>426</sup> Mid-Day Online Correspondent. (2024, July 5). *Delhi: Sale of glue traps stopped across markets after PETA India's appeal*. <https://www.mid-day.com/news/india-news/article/delhi-sale-of-glue-traps-stopped-across-markets-after-peta-indias-appeal-23360666>

It defines a “glue trap” as a trap which is designed, or is capable of being used, to catch a rodent, and uses an adhesive substance as the means, or one of the means, of capture.<sup>427</sup>

Section 1(5) also creates a positive obligation on any person who finds a glue trap in England that has been set in a manner which gives rise to a risk that a rodent will become caught in the glue trap and, without reasonable excuse, fails to ensure it no longer gives rise to such a risk.

Section 2 gives the Secretary of State the power to grant a glue trap licence authorising pest controllers to use glue traps for the purpose of preserving public health or public safety.

The GTOA does not make it an offence to buy or sell glue traps per se.<sup>428</sup>

### ***Commentary on the present Guidelines in Singapore***

22. Turning back to Singapore and the Guidelines concerning the use of glue traps by VCOs, it is important to note that the Guidelines do not have force of law per se. Per [3] of the Guidelines, which provides that failure to closely observe the Guidelines “**may result in** enforcement actions against the company or staff for animal cruelty” (our emphasis in bold), it appears that non-compliance with the Guidelines **could be** construed as “cruelty to animals” within the meaning set out in Section 42 of the Animals and Birds Act 1965.
23. The Committee makes several observations about the efficacy of the Guidelines.
24. First, while the Guidelines suggest that a failure to comply with the Guidelines may result in enforcement actions for animal cruelty (under Section 42 of the Animals and Birds Act), it cannot guarantee this and in fact adds nothing to further such an interpretation:
  - a. The modal verb “may” only goes as far as expressing a possibility and does not go as far as saying that a failure to adhere to the Guidelines will result in prosecution.
  - b. In India, the AWBI (the body tasked with advising in the context of the Indian PCAA) has made express pronouncements about the status of glue traps as “in direct violation of section 11(1) of the [Indian PCAA]” and these pronouncements have been adopted and enforced by State Governments. However, there is no such equivalent body in Singapore, and no similar source of legislative guidance expressly stating that a prohibition of glue traps is permissible under Section 42 of the Animals and Birds Act. While the Guidelines suggest that the failure to adhere to the Guidelines may amount to “cruelty to animals” under the Animals and Birds Act, the Guidelines are, in fact, unlikely to be considered extrinsic material of which reference is permissible under Section 9A of the Interpretation Act 1965, for the purposes of interpreting the Animals and Birds Act.
  - c. This is significant, bearing in mind that there is nothing in the Animals and Birds Act or any local precedent interpreting “cruelty to animals” to include the indiscriminate use of glue

<sup>427</sup> Glue Traps (Offences) Act 2022 (UK). <https://www.legislation.gov.uk/ukpga/2022/26> [Section 1(11)].

<sup>428</sup> Humane Society International. (2024, July 31). *England bans public use of inhumane rodent glue traps but animal charity warns consumers against accidental law breaking, as traps still available for purchase in shops.* <https://www.hsi.org/news-resources/england-bans-public-use-of-inhumane-rodent-glue-traps-but-animal-charity-warns-consumers-against-accidental-law-breaking-as-traps-still-available-for-purchase-in-shops/>

traps.<sup>429</sup> Section 11(1) of the Indian PCAA is also of little assistance in interpreting Section 42 of the Animals and Birds Act, as the former is significantly more expansive.

25. Second, on a plain reading of Section 42 of the Animals and Birds Act, what is being prohibited is actual animal cruelty.
26. Section 42 makes it an offence if one:
  - a. Cruelly beats, kicks, ill-treats, over-rides, over-drives, over-loads, tortures, infuriates, or terrifies any animal
  - b. Causes or procures or, being the owner, permits any animal to be so used
  - c. By rashly or unreasonably doing or omitting to do any act, causes any unnecessary pain or suffering or, being the owner, permits any unnecessary pain or suffering to any animal
  - d. Employs or causes or procures or, being the owner, permits to be employed in any work of labour, any animal which in consequence of any disease, infirmity, wound or sore, or otherwise, is unfit to be so employed
  - e. Causes, procures or assists at the fighting or baiting of any animal, or keeps, uses, manages, or acts or assists in the management of any premises or place for the purpose, or partly for the purpose, of fighting or baiting any animal, or permits any premises or place to be so kept, managed or used, or receives or causes or procures any person to receive money for the admission of any person to the premises or place
27. It is difficult to see how the mere installation of glue traps alone could fall under any of the subsections listed above. On a plain reading, Section 42 requires that there be an animal who is the subject of cruelty.
28. In other words, a plain reading does not support the act of placing a glue trap alone constituting an offence — there must be an animal who has suffered as a result. It is only if an animal has already been caught in the glue trap that a Section 42 offence may potentially be made out.
29. This creates several unintended consequences and difficulties in enforcement, primarily that the Guidelines do not add much in terms of preventing animal cruelty but rely on post-facto evidence of suffering for enforcement:
  - a. The act of indiscriminately placing glue traps is not considered criminal per se. It becomes criminal only when an animal is actually caught in the trap. This drastically reduces any window for enforcement.
  - b. VCOs who indiscriminately use glue traps but do not wish to face legal consequences may simply dispose of any trapped animals before any enforcement action can be taken.

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<sup>429</sup> A strong argument could be made that the cruelty inherent in glue traps renders indiscriminate use to be “cruelty to animals” but, even so, such a result is derived from first principles, and the Guidelines do not assist this exercise in any significant regard.

- c. By tying enforcement actions to the actual suffering of an animal, the Guidelines inadvertently create a loophole where the **significant potential for cruelty is not addressed**. Only when the risk the Guidelines aim to mitigate — such as unnecessary suffering or unintended capture of non-target animals — has actually transpired may enforcement **potentially** come into play.
30. Third, that the Guidelines are directed at VCOs and not even made available to the general public means that there is an imbalance in the treatment of glue trap use between VCOs and the general public. VCOs are subject to stricter scrutiny and higher compliance costs to ensure that their use of glue traps adheres to the Guidelines. Conversely, the general public faces little to no restrictions in their use of glue traps and can simply buy and use glue traps as they please. The stringent requirements on VCOs contrast with the public's freedom, creating a situation where glue traps are more acceptable when used by non-professionals, even though the potential for animal suffering remains the same.

***How Recommendation 15 should be enacted in Singapore***

31. The present position on the sale and use of glue traps in Singapore is one that recognises the efficacy of glue traps as a tool for trapping and removing rodents, but one that also recognises the inherent cruelty and risks that come with glue traps.
32. For the reasons set out above in the commentary on the Guidelines, this White Paper posits that the present Guidelines do not satisfactorily strike a balance between the efficacy of glue traps and the cruelty and risks.
33. At the same time, an outright ban such as that instituted in India and Wales may not, at least for the time being, accurately reflect Singapore's views on glue traps.
34. Given the nuanced considerations surrounding the efficacy and cruelty of glue traps, this White Paper proposes that any regulatory approach must be clear and practical while reinforcing a commitment to animal welfare.

**Prohibition of sale, setting, or use of rodent glue traps**

35. The Committee proposes a refined framework that ensures stringent control and responsible use of glue traps across VCOs and the general public, without going as far as imposing an outright ban:
- a. The sale of rodent glue traps to the general public is to be prohibited
  - b. The general public is to be prohibited from setting and using rodent glue traps (the general public may still use glue traps for control of vectors smaller than rodents)
  - c. Allowance of sale and use of rodent glue traps only by registered VCOs, licensed VCTs, and certified VCWs
  - d. For the Guidelines to be incorporated as conditions for registration, licensing, and certification, or as regulations

36. The CVPA is an act intended to, inter alia, consolidate and amend the law relating to the destruction of vectors and to provide for the registration, licensing, and certification of persons engaged in vector control work, and for matters connected therewith.
37. The use of rodent glue traps being a method of vector destruction, it would be appropriate for any legislative mechanisms for the regulation of rodent glue traps to be placed within the CVPA. The CVPA is also the Act concerned with the registration of VCOs, licencing of VCTs, and certification of VCWs.
38. That being said, the elementary nature of rodent glue traps is such that it does not neatly correspond to any of the existing parts of the CVPA. While Part 3 of the CVPA provides for a comprehensive regime for the control of pesticides and vector repellents, rodent glue traps are neither a pesticide nor vector repellent. They do not contain any active ingredient.
39. It therefore does not appear that a prohibition of the sale, setting, and use of rodent glue traps by the general public can be achieved by amending extant legislation. Such a prohibition is likely to require the enactment of new sections within the CVPA. The following phrasing is suggested:

**Prohibition of sale, setting, or use of rodent glue traps**

- X. — A person must not —
- (1) advertise, sell, supply, or offer for sale or supply any rodent glue trap to any person other than a registered vector control operator, licensed vector control technician, or certified vector control worker under this Act
  - (2) set or use any rodent glue trap unless the person is a registered vector control operator, licensed vector control technician, or certified vector control worker under this Act
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40. It is also recommended that Section 2 of the CVPA be amended as follows to make it clear that the use of rodent glue traps is reserved for VCOs, VCTs, and VCWs:
    - a. “vector control work” means any work carried out for the purpose of vector control, and includes the use of rodent glue traps
    - b. “rodent glue trap” means a trap which is designed, or is capable of being used, to catch a rodent, and uses an adhesive substance as the means, or one of the means, of capture, but does not include any glue trap for the purposes of capturing insects if the trap—
      - i. has a cage or other protection which prevents any rodent from contact with the adhesive surface, or
      - ii. is designed to prevent the capture of a rodent
  41. The definition of “rodent glue trap” takes reference from the definition set out in the English GTOA. While the term defined in the English GTOA is “glue trap” and the term defined here is “rodent glue trap”, the subject of the definition is substantively similar. The reference “rodent” is intended to set an implicit size limit — glue traps that are intended for insects, and that are not large enough to capture a rodent, would be excluded from the intended definition of rodent glue traps. Defining the term as “rodent glue trap” is intended to prevent confusion, as glue traps for the purposes of capturing insects would remain legal under the proposed legislation.
  42. Further, “use” is defined in Section 2 of the CVPA as including “any act of handling, operating, dispensing, preparation, application, storage and disposal”. This would enable the prohibition to

cover any homemade traps, given the rudimentary nature of glue traps and the ease of assembling one.

### **Regulation of VCOs, VCTs, and VCWs**

43. As for the regulation of VCOs, VCTs, and VCWs, there appear to be two routes open to the Director-General.
44. First, Section 29(3)(a) and (6) of the CVPA grant the Director-General the power to make the grant (or provisional grant) of the registration (of VCOs), licence (for VCTs), or certificate (for VCWs) subject to any conditions that the Director-General thinks fit.
45. This provides an avenue for the Director-General to give the Guidelines the status of conditions that the registration, licence, or certificates of VCOs, VCTs, and VCWs are respectively subject to.
46. For extant VCOs, VCTs, and VCWs who already have registrations, licences, and certificates, Section 29(7) of the CVPA grants the Director-General the power to vary the conditions presently imposed or impose new conditions at any time.
47. Where a VCO, VCT, or VCW fails to abide by such conditions, Section 31(1)(b)(ii) gives the Director-General the power to suspend or cancel a registration, licence, or certificate.
48. Second, Section 60 of the CVPA, inter alia, 60(2)(f) and (h), grants the NEA the power to, with the approval of the Ministry of Sustainability and the Environment, make regulations for the purposes of carrying out the CVPA, including regulations:
  - a. Prescribing the duties and obligations of registered VCOs, licensed and provisionally licensed VCTs, and certified and provisionally certified VCWs
  - b. Prohibiting, controlling, or regulating the carrying out of any type of vector control work or the use of any type of pesticide for the purpose of vector control
49. On the basis that “vector control work” as defined in the CVPA is broad enough or has been amended to encapsulate the use of rodent glue traps, Section 60 may be used to give regulatory force to the Guidelines, such that any breaches of the Guidelines may be punished with a fine (of not more than S\$10,000).<sup>430</sup> This would allow for more proportionate regulatory responses to non-compliance by VCOs, VCTs, and VCWs, compared to the significantly more drastic suspension or cancellation that the imposition of the Guidelines as conditions to registration, licensing, or certification may bring.

**June 2025**

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<sup>430</sup> Control of Vectors and Pesticides Act 1998 (2020 Revised Edition). <https://sso.agc.gov.sg/Act/CVPA1998> [Section 60(3)].