



**AKVMA**  
E | [info@akvma.org](mailto:info@akvma.org)  
T | 907.205.4272

November 30, 2020

**Re: Mat-Su proposed ordinance change “OR 20-102” re: regulation euthanasia changes  
24.15.080 EUTHANASIA**

Dear Mat-Su Borough Assembly Members,

Thank you for the opportunity to comment on the proposed Mat-Su Borough euthanasia regulation changes. These comments are on behalf of the Alaska State Veterinary Medical Association (AKVMA). The AKVMA is committed to helping protect the health, safety, and welfare of Alaskans, advocating for veterinarians to provide safe, competent professional veterinary services to consumers, and supporting scientifically based regulations that support these goals.

**The AKVMA is opposed to the proposed changes.** Veterinary practice encompasses veterinarians who pride themselves on a thorough physical exam, diagnostic testing, treatment plans, surgical intervention, and in some situations, humane euthanasia. When humane euthanasia becomes an option, know that veterinarians have considered many factors, from the animal’s physical exam, to prognosis and pain. Euthanasia is the act of producing a humane death in an animal and should not be taken lightly. Veterinarians have been trained to recognize when it is appropriate, what techniques to use, and to perform them correctly in order to minimize stress, pain, and anxiety for both owners and the animal.

The AKVMA finds the removal of a veterinarian in the decision-making process for a health-related euthanasia alarming. Shelters have a veterinarian on staff that has the ability to perform a physical exam and appropriate diagnostics in order to make an informed decision in regard to the animal’s health and welfare. For occasions when the veterinarian is not present on-site, and an animal whose health or physical condition requires euthanasia for humane reasons, the on-call staff veterinarian should be available or consultation/examination with a local and or emergency veterinarian. The AKVMA does not feel that it is appropriate for an animal care or regulation officer, even though trained and certified to perform the euthanasia itself, to examine an animal and make a determination as to the treatability of the animal’s conditions without communication with a licensed veterinarian. Allowing an animal control officer or shelter worker to euthanize an animal without communicating with a veterinarian may be considered practicing veterinary medicine without a license (diagnosing and treating an

animal, or in this case, diagnosing an animal with an untreatable condition and declining to treat but rather to euthanize), which is contrary to current Alaska statutes and regulations.

The decision to euthanize an animal due to a poor medical prognosis should be made by a licensed veterinarian or an animal care and regulation officer in consultation with a licensed veterinarian. Veterinarians are qualified and took an oath to use their scientific knowledge and skills to benefit society through the protection of animal health and welfare, and the prevention and relief of animal suffering. The proposed changes are not in the best interest of the public, nor the animals in their care when shelter workers make medical decisions on behalf of an animal without consultation with a veterinarian.

Sincerely,

A handwritten signature in black ink, appearing to read 'McKayla Dick', with a large, sweeping flourish above the name.

**McKayla Dick, DVM**  
**President**  
**Alaska Veterinary State Veterinary Medical Association**

***“Promoting excellence and professionalism of Alaska Veterinarians in advancing the health and well-being of animals and the public.”***