Dear Oregon State Senators,

Regarding SB 976 that proposes non- veterinarians be legally allowed to perform bovine pregnancy diagnosis and equine dentistry:

It has come to our attention that you will be reviewing SB 976 this week. The Oregon State University Carlson College of Veterinary Medicine's Student Chapter of the American Association of Equine Practitioners (SCAAEP) would like to share with you our concern for animal welfare and express opposition to what this bill proposes.

We have listed our main concerns in the tables below.

Relating to both the diagnosis of pregnancy in cattle and dentistry in equids:

There is currently no regulation of the education or practice for either pregnancy diagnosis in cattle nor equine dentistry certification without a veterinary license. Veterinarians are liable to the Oregon Veterinary Medical Examining Board (OVMEB) and clients can make a direct request for audit of individuals who falter from the law. Under this proposed bill no such regulatory body exists.

The bill proposed does not include any requirement for medical record keeping for either procedure.

With either pregnancy diagnosis of cattle or dentistry of equids there is an increased risk of zoonotic exposure. Zoonotic diseases are not a common topic that is appropriately covered in non- veterinary education.

Both having a veterinarian diagnose pregnancy in cattle or perform dentistry in an equine establish a Veterinary- Client- Practice Relationship (VCPR) as stated by the Veterinary Practice Act. This will allow the producer/ owner to be able to call upon the veterinarian to discuss health issues, reportable disease risk or identification, and to be eligible to receive emergency care from that veterinary practice.

Relating the diagnosis of pregnancy in cattle:

Most diagnosis of pregnancy in cattle takes place at the producer's property. A veterinarian who is visiting may be able to identify herd health problems before they cause welfare issues for other animals or the general public.

When a veterinarian diagnoses pregnancy, they can identify and diagnose anything that may cause issues at the time of parturition. This can lead to discussion of a treatment plan with the producer and in some cases saving the life of the mother cow and her calf. Any person who is not a veterinarian may not diagnose any animal according to the Oregon Veterinary Practice Act.

Ultrasound is the best way to assess fetal health, this information cannot be fully attained by palpation alone. It takes extensive training and expensive equipment to be able to use and accurately interpret ultrasound images.

If done improperly, palpation for pregnancy diagnosis can cause death and/ or abortion of the fetus. If the fetus dies but is not aborted, the mother will perish.

Open cows (those who are not pregnant) are often shipped to slaughter. If they are misdiagnosed as open, this may cause the unnecessary death of both the mother and her unborn calf.

If many cows are misdiagnosed as open, the bull will often also be shipped to slaughter, causing his unnecessary death.

Relating to dentistry in equids:

A physical examination should be completed on any horse prior to a dental procedure. This can identify potential concerns for the horse including heart murmurs, tumors/ masses, neurologic abnormalities, welfare concerns, etc. that can then be discussed with the owner. This cannot be legally accomplished by a person without a veterinary license according to the Veterinary Practice Act.

During a dental procedure, the horse's mouth is examined and lesions of concern (cancer, abscess, etc.) can be identified, diagnosed, and treated by a veterinarian. This cannot be legally accomplished by a person without a veterinary license according to the Veterinary Practice Act.

Sedation is required in most cases to maintain the best welfare of a horse receiving dental care. Should the horse panic or begin to move their head too much they are at a drastically increased risk of morbidity or mortality. Any person without a veterinary license cannot legally carry, prescribe, or administer sedative drugs.

Many veterinary drugs are at a high risk for abuse when they fall into the wrong hands. Among these are some of the drugs that are commonly used to safely complete equine dentistry (Xylazine, Butorphanol, Detomidine, etc.). Allowing these drugs into more people's hands may increase the risk for abuse and illegal diversion of these drugs from their intended use.

After some dental procedures, the horse's welfare is in dire jeopardy if they cannot receive analgesics (pain medication). A person without a veterinary license cannot prescribe these horses any pain medication.

Most horses will need a tooth extracted at some point in their life, this is a surgical procedure. If completed improperly it is possible to damage the skull to the point of breaking which will likely cause the horse to be euthanized. Analgesia (pain medication) is also essential for every horse who has a tooth is extracted.

After some dental procedures, a horse will need to be placed on a course of antibiotics to avoid major morbidity/ mortality. A person without a veterinary license cannot prescribe antibiotics and has not had the appropriate level of training to identify which antibiotics to use or to be mindful of preventing antibiotic resistance.

Non- veterinarians lack the proper education and drugs to handle a crisis that may occur during or as a result of a dental procedure (hemorrhage, anaphylaxis, etc.).

Aside from the dentistry taking place many other client education topics, public health concerns, and other medical questions from the owner can be answered/ relayed at the same appointment. Many horse owners may not otherwise see a veterinarian in the year and could miss education and information critical to the horse's welfare.

We would like to thank you for your time spent reviewing this document and your consideration of our concerns. We again would like to strongly urge you to deny SB 976 from moving forward in the interest of maintaining the welfare of our Oregon equine and bovine populations.

Sincerely,

The Student Chapter of the American Association of Equine Practitioners (SCAAEP) at Oregon State University's Carlson College of Veterinary Medicine.