



RAAD VOOR DIERENAANGELEGENHEDEN

Dilemmas in Wildlife Rescue and Rehabilitation

Caring for wild animals in need of help

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Procedure

This advisory report from the Council on Animal Affairs was prepared by a working group of Council members comprising Prof. J.J.M. van Alphen (chair of the working group), W.T.A.A.G.M. van den Bergh, D. van Gennepe, J. Staman, LL.M., and Young RDA member S.A.M. van der Hoeven, MSc. The working group was supported by a focus group from the RDA, comprising the members A.G. Dijkhuis, LL.M., F.E. Rietkerk, C.W. Ripmeester, LL.M., Prof. T.B. Rodenburg, Prof. G.R. de Snoo, R.A. Tombrock, F.A.L.M. Verstappen and Young RDA member M.A.A.M. van Gerwen MSc. The advisory report is a product of the Council as a whole.

The group held seven meetings for the purpose of preparing the report. The working group received assistance in its work from Secretary M.H.W. Schakenraad and Deputy Secretary R.L. van Oudheusden from the RDA team. This advisory report was prepared by the Council at the request of the Minister of Agriculture, Nature and Food Quality.

Structure of the report

Chapter 1 consists of an introduction, which sets out the key question, cause, guidelines and scope for this advisory report. Chapter 2 reflects on the question of whether a wild animal in need of help should be helped and looks at the legal duty of care and moral responsibility of people for the welfare of animals. An important question addressed in this chapter is what it means to 'be in need of help' and when animals are or are not considered to be in need of help their adaptability is impaired. The social context, dilemmas and perplexities relating to the rescue and rehabilitation of animals are also covered in this chapter. Chapter 3 focuses on how animals in need can best be helped and the challenges identified by the RDA in the current practice through interviews with the sector. Chapter 4 looks at who should help animals in need of help and what duties, responsibilities and needs various parties have in relation to wildlife rescue. Finally, Chapter 5 presents the conclusions arising from this advisory report. The RDA also makes several recommendations to the Minister of Agriculture, Nature and Food Quality (LNV) to implement improvements in animal assistance, in consultation and collaboration with the sector, with a focus on the welfare of the animals.

Summary

On 20 August 2020, the RDA was asked by the Minister of Agriculture, Nature and Food Quality whether and how a wild animal in need of help should be helped, and by whom.

Wild animals in need of help should be helped, based on a requirement in the Animals Act (*Wet dieren*; Chapter 2, Paragraph 1, Section 2.1 Cruelty to animals, subsections 6 and 7): "6) *Everyone must provide the necessary care to an animal in need of help.* 7) *Subsections 1 to 6 also apply to animals other than captive animals.*"

The Explanatory Memorandum to the Animals Act contains a reference to this section on page 82: "*The obligation to provide the necessary care to animals in need of help also applies to wild animals*".

In previous advisory reports, the RDA examined the ways in which people fulfil their moral responsibility for the welfare of animals (including wild animals) in practice. This responsibility was referred to using the term 'duty of care', which includes all degrees of care (RDA, 2012; RDA, 2017). Animals are living, sentient beings and have intrinsic value. Directly or indirectly, humans have an impact on the ability of individual animals and animal populations to adapt to the prevailing conditions. That does not mean that all animals should be helped in all circumstances. Intervention is required "*If the animal's ability to adapt has been exceeded **and** intervention is physically/technically possible **and** there are no human or animal interests that outweigh the compromise of animal welfare **and** the intervention/measures are socially acceptable or the suffering is socially unacceptable*" (RDA, 2017).

In nature, animals get into trouble, become weak, suffer and die as a result of disease, predators or other causes. This is part of the circle of life in the ecological system. The Nature Conservation Act (*Wet natuurbescherming*) and the Animals Act do not aim to address the suffering of wild animals in natural situations in a general sense. The Nature Conservation Act states that everyone must take sufficient care for animals living in the wild and their immediate habitat and, in principle, should generally refrain from actions with potentially adverse consequences.

Providing care for wild animals is thus included in the legislation in different ways. Because of these differences, the RDA considers that the central question is when an animal is or is not in need of help.

Whether an animal is in need of help or can take care of itself depends on the ability of the animal to adapt to a specific situation. Humans and animals are coming into contact with each other with increasing frequency, and it is becoming harder to distinguish between animals' natural habitats and human living environments. Consequently, when suffering animals are found by people in an urban context, assessing this distinction is difficult; citizens often find it hard to determine whether an animal's ability to adapt has been exceeded.

When considering the various factors and deciding whether or not to intervene (and if so, how), expert assistance (from a veterinarian or biologist) is often necessary.¹

Animals that are injured or contaminated (from oil, waste, etc.) are in need of help; they can no longer take care of themselves and can no longer adapt to the situation. In the case of weakened, exhausted and sick animals, specific consideration of a range of factors is required, not only at the level of the individual animal, but also because of the effect on the population and ecosystem to which the animal belongs. Young animals and over-fatigued animals such as migratory birds are usually not in need of help and are still able to adapt to the situation.

Initially, animals in the wild should be left alone wherever possible. When someone encounters a living animal that does not react when they approach, or makes feeble attempts to flee, fight or threaten the person, it should be assumed that this animal can no longer function without help. In such a situation, even an ordinary citizen is expected to provide help. This help consists of what we call 'a duty to seek expert assistance': calling an animal ambulance or other emergency service, or calling 144 for advice on the extent to which the animal is in need of help and suggestions on how to provide whatever help is needed. In terms of the duty to seek expert assistance, it is important that citizens know what actions they can take by themselves when they find a wild animal in need of help and where they can turn to for information and expert assistance (which they should do first). In other words, they do not have to catch and transport animals by themselves, and they certainly do not have to care for the animals themselves. The best form of help for an animal in need of help is best determined by a specialist/expert. This is to ensure not only the welfare of the animal, but also the safety of the person who found the animal. In some cases, capable citizens can move animals themselves, but in case of doubt, expert help or advice should be sought.

The duty of care applies to everyone, but not everyone has the same responsibility. People have empathy for animals in need of help and feel a sense of urgency to provide help, but they often lack the knowledge and experience to assess whether and what help is required. It is best to provide people with general information in advance about the need to seek assistance from an expert, who can assess each situation and make the right decision. How a wild animal in need of help should be helped depends on the circumstances. Every situation is unique and requires a specific assessment of the best form of help. This requires experience. The provision of help to wild animals involves a chain of care providers, such as the 114 call centre, wildlife sanctuaries, animal ambulance services and veterinarians, with various decision-making stages.

¹ "Saving" birds with bird flu, for example, can be hazardous to human health. By contrast, botulism victims can be helped.

Proper care can involve of alleviating suffering or nursing an animal back to health if there is a prospect of returning to life in the wild. To ensure proper care, the RDA believes that the provision of help to wild animals in need must be improved and that all animals, everywhere, should be able to receive help at the same basic level of quality. Finding sufficient funding and thus securing a long-term future and ensuring continuity of care and assistance for wild animals in need of help is a major problem that wildlife sanctuaries claim they cannot solve on their own. By imposing a statutory duty of care on citizens, it is reasonable to expect that the government would provide the resources to facilitate the execution of the duty of care, to ensure sufficient uniformity and continuity of wildlife rescue and rehabilitation. In view of the regional function of wildlife sanctuaries and provincial authorities' responsibility for nature conservation, it is at this level that support should be provided. The RDA has identified areas for improvement, including a leading role for the government, and accordingly prescribes the following recommendations.

In the interests of the welfare of wild animals, the RDA recommends that the Minister, in consultation and collaboration with the sector and other public authorities, should focus on the following three areas to improve the help given to animals:

1) Ensure continuity: long-term funding for wildlife rescue and rehabilitation

- The RDA calls on the central government to enter into dialogue with other public authorities and make agreements about their respective responsibilities in the rescue and rehabilitation of wild animals in need of help, including structural financial support from government for wildlife rescue and rehabilitation in the Netherlands.
- Because the regional function of wildlife sanctuaries and the responsibility for nature conservation and granting exemptions to wildlife sanctuaries lies with provincial authorities, making provincial authorities responsible for ensuring structural funding seems like the obvious solution. Provincial authorities could join forces with municipal authorities, a number of which are becoming committed to wildlife rescue and rehabilitation.
- Wildlife sanctuaries have good examples and new ideas of ways in which structural funding could be used (such as a conservation contribution, a professionalisation contribution, costs per animal or a fund). Work with them on the concrete implementation and shaping of the support structure, based on common interests.

2) Ensure a basic level of quality of help throughout the country

- The central government has a leading role to play in facilitating a national network for uniformity, continuity and a basic level of quality with regard to providing help to animals.
- National policy rules and quality requirements for animal assistance should not be limited to wildlife sanctuaries but should also be established for those involved in animal transport and other care providers within the chain.. Private certifications and quality initiatives for animal ambulance services should be encouraged and potentially even recommended, including rules on nationwide coverage and acceptable response times, so that expert help is accessible for all animals in the country.

- The government should play a supervisory role to prevent the proliferation of unprofessional sanctuaries in the sector. This can be achieved by establishing clear rules, defining an ethological, veterinary, legal, and ethical framework, and ensuring proper supervision. Regarding animal ambulances, quality improvements can be made by following the previously mentioned recommendations, through supervision and by adopting a publicly transparent approach.
- An umbrella organisation should be established and should conduct regular consultation with wildlife sanctuaries about the necessary expertise and level of training and ensure continuous monitoring and improvement of help from an animal welfare perspective.

3) **Ensure good provision of information and encourage research and the exchange of knowledge**

- Citizens should be informed about when an animal is or is not in need of assistance, what actions they can take when encountering an animal in need, and where to find expert help. The government should facilitate proper education and information. This can be done by supporting the animal assistance sector in their communication efforts or by providing information directly. Through broader and repeated communication, people can be better informed. Information should be integrated at all levels of the chain. Accurate and specific information should also be available at emergency hotline 144 and triage call centers to provide specialist advice, including guidance for follow-up actions.
- If the government facilitates stability and continuity in the sector, the sector will have more scope to give attention to informing, educating and contributing to research. Potential research topics include trends in arriving animals, the causes of those trends, success percentages of released animals, and animal diseases and their spread. In addition, better data collection by the 144 call centre could add value.

The RDA regards harmonisation to occur within the sector important and that no significant inequality should exist or arise due to regional differences in terms of the help given to animals. The Council considers that a round-table discussion with public authorities and the sector would be a good next step. Such a discussion could include examples of best practices and examine the additional value of drafting a practical handbook (most important dos and don'ts) for citizens to increase the 'learning effect'.

1. Introduction

1.1 Reason for the report and key question

On 20 August 2020, the RDA received the following request, including a letter of explanation, from the Minister of Agriculture, Nature and Food Quality (see Annexes 1 and 2):

Request from the Minister to the RDA

"... I request that you produce an advisory report on the question of whether and how a wild animal in need of help should be helped, and by whom."

The Minister's question is central to this report, "*whether and how a wild animal in need of help should be helped, and by whom*". The request to the RDA was announced to the House of Representatives and came in response to various motions (see Annexes 1 and 2).

1.2 Starting point and scope

The purpose of this advisory report is to answer the Minister's question. In preparing the advisory report, the RDA started with current legislation, particularly the Animals Act and the Nature Conservation Act. The advisory report concentrates on the process and decision-making relating to wild animals in distress.

In the request to the RDA, the Minister indicated what she meant by 'wild animals': "*Here, the term 'wild animals' is used to mean animals of a species that occurs naturally in the Netherlands*" (see Annex 1). The Minister did not indicate which animals do not fall within her definition. In this advisory report, where relevant, the RDA will discuss categories of animals for which it is not clear whether they fall within this definition or not. The RDA stresses that the distinction between 'wild' and 'not wild', as well as between 'naturally' and 'not naturally' occurring in the Netherlands, is not always clear, and even the 144 call centre, ambulance services and sanctuaries cannot always make such a black-and-white distinction. Consider, for example, captive animals whose owner is unknown, such as an escaped ornamental bird or house cat, feral animals and exotic species. The Animals Act and the Nature Conservation Act draw a distinction between different categories of animals and in terms of the degree of protection. This distinction does not relate to animals in need of help. The Animals Act (Chapter 2, Paragraph 1, Section 2.1 Cruelty to animals, subsections 6 and 7) states:

"6) *Everyone must provide the necessary care to an animal in need of help.*

7) *Subsections 1 to 6 also apply to animals other than captive animals.*"

The rescue and rehabilitation of seals are not explicitly included in this advisory report, since the Seal Rehabilitation Agreement (*Zeehondenakkoord*) was signed with the sector in 2020. Agreements were made between the parties involved in the rescue and rehabilitation of seals.

The working group recognises the ambivalence of trying to respond to the feelings of people who want to help animals while at the same time saying that nature and the animals that live there must be left alone (both statements flow from requirements in various statutes).

For this advisory report, to obtain background information about the current situation on the ground in the Netherlands, 10 interviews were conducted with parties working in the field of wild animal rescue and rehabilitation. Various sanctuaries, selected to ensure a range of sizes and locations across the Netherlands, as well as staff from the 144 call centre, the Dutch Society for the Protection of Animals and the Dierenlot Foundation, were approached for these interviews. The information was used to obtain an up-to-date picture of everyday practice in wildlife rescue and rehabilitation. Information from the interviews is included in the annexes. Nature managers, conservationists and ecologists whose tasks are primarily focused on the management of nature reserves and the preservation of populations were not approached for interviews.

Information about wildlife rescue and rehabilitation was also obtained from municipal and provincial authorities during interviews for another RDA advisory report, 'The Role of Local and Regional Authorities in Relation to Animal Welfare'. That

2. WHETHER we should help wild animals in need

The short answer: Yes, for two reasons. Wild animals in need of help must be helped based on a legal requirement in the Animals Act (2.1) and due to the widely held view among citizens that they have a moral responsibility for the welfare of animals (2.2). Because of the basic principle that animals in the wild should be left alone wherever possible, it is important to know when animals are and are not in need of help and whether the animal's ability to adapt has been exceeded. This can often only be assessed by an expert.

2.1 Laws and regulations

- In relation to caring for a sick or injured animal, the following points from Section 2.1 of the Animals Act (the section on cruelty to animals) apply:
 - *Subsection 1: "It is prohibited to cause an animal pain or injury or to harm the health or welfare of the animal without good reason or in excess of what is acceptable for this reason."*²
 - *Subsection 6 "Everyone must provide the necessary care to an animal in need of help."*
 - *Subsection 7 "Subsections 1 to 6 also apply to animals other than captive animals."*

Section 2.1 of the Animals Act applies to all animals, regardless of whether they are captive or live in the wild.³ The Explanatory Memorandum to the Animals Act contains two relevant references:

- *"The obligation to provide the necessary care to animals in need of help also applies to wild animals"* (page 82). The memorandum continues: *"This requires human intervention, which may conflict with the 'hands-off' principle mentioned elsewhere. Careful consideration is therefore required."* The explanation addresses the relationship with the now-obsolete Flora and Fauna Act (*Flora- en faunawet*) (which dealt with the protection of animals belonging to species that live in the wild), which was later incorporated into the Nature Conservation Act.
- *"However, what is meant by 'necessary care' may differ for animals living in the wild and captive animals"* (page 100). This is followed by a reference to another section in the Explanatory Memorandum, which in turn refers to the Animal Welfare Policy Memorandum (*Nota Dierenwelzijn*).

² In 2021, the House of Representatives added an amendment: *"In any event, a 'good reason' does not include being able to keep animals in a certain husbandry system or a certain housing method"* (Parliamentary Paper 35 398, no. 23). The explanation for the amendment calls for it to take effect on 1 January 2023. Source: Letter to the House of Representatives, 2020b.

³ The recognition of the intrinsic value of animals in the Animals Act likewise applies to all animals, whether captive or non-captive, and whether wild or domesticated.

- Nature Conservation Act, Section 1.11:
 - Subsection 1 *"Everyone must take sufficient care with respect to Natura 2000 areas, special national nature reserves, animals and plants living in the wild and their immediate habitats."*
 - Subsection 2 *"The care referred to in subsection 1 means, at a minimum, that everyone who knows or has reasonable grounds to suspect that their actions or omissions could have harmful consequences for a Natura 2000 area, special national nature reserve or animals and plants living in the wild:*
 - *must refrain from such actions; or*
 - a. if refraining from those actions cannot reasonably be required, must take the necessary measures to prevent such consequences; or*
 - b. insofar as the consequences cannot be prevented, must limit or remedy them as much as possible.*

This section instructs everyone in the Netherlands to take sufficient care with respect to animals living in the wild. This mainly means refraining from actions that could have harmful consequences for animals living in the wild.⁴

In other words, the Nature Conservation Act mainly tells us to make sure that animals do not get into trouble. In relation to caring for a sick or injured wild animal, the Explanatory Memorandum to the Nature Conservation Act refers to the Animal Health and Welfare Act (*Gezondheids- en welzijnswet voor dieren*), which has now mostly been integrated into the Animals Act (Parliamentary Paper, House of Representatives, 2008).

To be allowed to rescue and rehabilitate wild animals in need of help, an exemption under the Nature Conservation Act is required, including in relation to Section 3.5, which bans the killing and capture of animals, and Section 3.24, which covers the 'holding' of animals. The granting of exemptions was previously handled by the central government but is now largely within the purview of provincial authorities, due to the devolution of nature policy to the provinces, with some exceptions (Netherlands Enterprise Agency, 2020). Exemptions for the rescue and rehabilitation of wild animals are subject to minimum conditions and requirements (see Annex 5 for a list). In addition, sanctuaries must comply with the requirements set out in the schedule to the Policy rules on the quality of rescue and rehabilitation of animal species.⁵

This document contains rules and quality requirements about objectives, practices, accessibility and collaboration with other sanctuaries. The quality rules try to meet the needs of the animal/species. The welfare of the animal and the possibility of returning it to the wild are the key principles in this document (Policy rules on the quality of rescue and rehabilitation of animal species, 2017).

⁴ The Explanatory Memorandum to the Nature Conservation Act states that this 'duty of care' is intended to apply to citizens, public authorities and businesses (Explanatory Memorandum, page 66 and other places).

⁵ These are currently being updated and also apply to exemptions under Section 2.2(1) of the Animals Act.

2.2 Moral responsibility and duty of care

The intrinsic value of animals is recognised in the Animals Act, Section 1.3. There is a widely shared feeling in society that people have a moral responsibility for the welfare of animals.⁶ Animals are living, sentient creatures. Directly or indirectly, humans have an impact on the ability of individual animals and animal populations to adapt to the prevailing conditions. In previous advisory reports, the RDA examined the ways in which people fulfil their moral responsibility for the welfare of animals (including wild animals) in practice. This responsibility was referred to as a 'duty of care', a term that includes all degrees of care (RDA, 2012; RDA, 2017). The RDA believes that the 'duty of care'⁷ refers to the way in which we can and must fulfil our moral responsibility for the welfare of animals in practice (RDA, 2012). This is related to a context, namely the situation the animal is in, and is partly determined by the degree of human control⁸ over that situation and the extent to which the animal is restricted in its ability to adapt to the conditions of its current surroundings.

In 2017, the RDA answered the general question "When is intervention required?" in its advisory report 'Weighing Wildlife Welfare': *"If the animal's ability to adapt has been exceeded **and** intervention is physically/technically possible **and** there are no human or animal interests that outweigh the compromise of animal welfare **and** the intervention/measures are socially acceptable or the suffering is socially unacceptable"*.

Only when the ability of an animal (or group of animals) to adapt is exceeded does the duty of care require an assessment to be made of the situation and, ultimately, measures to be taken to prevent unacceptable suffering. Such measures must always be related to the animal's ability to adapt or be focused on eliminating the restrictive conditions in the animal's surroundings.

2.3 When is an animal in need of help?

In this advisory report, the Council would like to address the following points:

- the need for help in the context of the Animals Act;
- the ability of wild animals to adapt;
- assessing whether wild animals need help and identification of categories;
- reasons why an animal may be in need of help

⁶ In this advisory report, as well as in its previous advisory reports, such as Weighing Wildlife Welfare (2017) and Duty of Care, Naturally (2012), the RDA adheres to this statement: "Our moral responsibility for the welfare of animals transcends context (i.e. it does not depend on the situation) and applies to captive, non-captive and semi-captive animals alike. This moral responsibility is separate from the question of how we interpret and implement it through our duty of care."

⁷ "This duty of care may also entail a duty NOT to intervene. This is often referred to as a 'hands-off' duty" (RDA, 2012).

⁸ The duty of care may be restricted by physical/technical limitations, human or animal-oriented interests that outweigh the compromise of animal welfare or the social acceptability of intervention measures/suffering. For further elaboration, see RDA, 2012 and RDA, 2017.

2.3.1 The need for help in the context of the Animals Act

In the context of the need for help, the Animals Act talks about 'an animal in need of help'. That means an individual, not a population. Accordingly, the focus in this advisory report is likewise on the individual in need of help. An animal that is dependent, in need of help and unable to physically save itself from the situation it is in may need support so that it does not die or suffer unnecessarily.

2.3.2 The ability of wild animals to adapt

In nature, animals can get into trouble, become weak, suffer and die, due to the actions of predators or otherwise. This is part of the life cycle in the ecological system; suffering is not always problematic. The Nature Conservation Act and the Animals Act do not aim to address this type of suffering of animals in natural situations in a general sense. Nature managers intervene only in exceptional circumstances, such as fire, drought and floods, and only when the ability of the animals to adapt is exceeded. Wild animals in their natural surroundings should be left alone wherever possible, as intended by the Nature Conservation Act (reflected in the requirement not to disturb nests and habitats). This management philosophy is broadly, indeed globally, supported.

From an ecological perspective, the natural way in which populations sustain themselves is extremely important. The prevailing view is that humans have only a marginal role to play, which is primarily that of mitigating or remedying disruptions caused by humans. The suffering of animals in the wild, due to starvation, for example, is thus seen as normal and inevitable.

Moral issues often arise when natural adaptation mechanisms are blocked or destroyed by humans. There is a difference between the ability of an individual to adapt and the ability of a population to adapt. Helping weaker individual animals may have a negative impact on the population, which would result in more individuals being in trouble.

2.3.3 Assessing whether wild animals need help

Assessing whether wild animals need help is not always easy. Sometimes it is clear: if an animal is hit by a car and injured, if a bird is found submerged in oil on a beach or if an animal is tangled in a net or fence; in these cases, help is needed. But sometimes it is more difficult. The natural environment of animals is close to human living environments. The impact of humans on that natural environment is far reaching. We come in contact with each other with increasing frequency, and it is becoming harder to distinguish between the two environments. People also encounter healthy animals that appear to need help, such as fawns or young birds that have just left the nest. In spite of the fact that these animals can often look after themselves, people feel a moral and emotional urge to help what are, in their view, 'helpless' animals. In the often urban context in which suffering animals are found by people, it is difficult for citizens to assess the situation, and they find it hard to determine whether the animal's ability to adapt has been exceeded. Such an assessment may be subject to the human urge to meddle (and our arbitrary natures). In that sense, the ability of animals to adapt in an urban context will often be limited (due to the presence of people, traffic, human activities, etc.).

When weighing up the various factors and deciding whether or not to intervene (and if so, how), expert assistance (from a veterinarian or biologist) is often necessary.⁹

If someone encounters a living animal that does not react when they approach, or makes feeble attempts to flee, fight or threaten the person, at first glance it will (or should) be assumed that this animal can no longer function without help and – if left to itself – will die. In such a situation, even an ordinary citizen is expected to provide help. The aim of this help is to ensure that the animal receives appropriate assistance, for example by calling 144, an animal ambulance or other emergency service, and not by people caring for, catching or transporting the animal themselves. The same applies to non-wild/captive animals that are left unattended (such as a dog in an overheated car or an injured feral cat) or wild or non-wild animals that get hit by a vehicle. This assessment will not always be correct: hedgehogs that appear to need help but are actually hibernating or young birds that look helpless but have only just left the nest and are still being cared for by their parents.

The best form of help for an animal in need of help is best determined by a specialist/expert (who forms one link in the chain of animal assistance). This means that citizens should actually seek help from specialists pretty quickly, by calling 144 or another hotline, a veterinarian or a wildlife sanctuary. This is to ensure not only the welfare of the animal, but also, very often, the safety of the person who found the animal in need of help. It is important to be aware that helping animals can be hazardous for people, due to physical challenges (the animal may still attack/injure the person; a heron, for example, could take someone's eye out), safety in traffic or infectious diseases that can also affect humans, known as zoonotic diseases (when handling a bird with bird flu, for example). Incorrect handling can lead to an animal experiencing considerable stress. In some cases, capable citizens can move animals themselves, but in case of doubt, expert help or advice should be sought.

⁹ "Saving" birds with bird flu, for example, can be hazardous to human health. By contrast, botulism victims can be helped.

So who is an expert?

The next few chapters of this advisory report deal extensively with how and who it is best to contact in what situations and who should do what in the chain of assistance for animals in need of help. Because the word 'expert' (or specialist) is used frequently, the RDA wishes to emphasise that it is not referring to a single type of expert or specialist. Because the rescue and rehabilitation of animals takes place within a chain, a different type of expertise is required at each stage for the assessment that is needed at that time. It is expressly not our intention to narrowly define an 'expert' as being solely a veterinarian, biologist or paid coordinator. At certain stages of the chain, trained and/or experienced volunteers (in a call centre, ambulance or sanctuary) can also be experts. In this respect, there is no such thing as 'the' expert. Each stage requires its own expertise. Naturally, conditions and requirements may be imposed on that expertise. This will be discussed in more detail in subsequent chapters.

As mentioned earlier, assessing whether wild animals need help is not always easy (and also not always possible on initial contact). In the table below, by way of illustration, the RDA attempts to show the distinction between different categories of animals. For each category, it is stated whether the animals are considered (by the RDA) to be in need of help. In addition, the location where the animal is found may affect the assessment of whether it needs help; a weakened animal in an urban environment might be assessed differently to the same animal in a nature reserve. Help might also mean doing nothing, leaving it alone or euthanasia (see also 3.1). The categorisation is not intended to be a black-and-white set of distinguishing criteria but to show that the assessment of whether an animal needs help is complex and requires the balancing of a variety of factors. For example, sick or injured animals cannot always be kept apart, and animals may be injured or contaminated to a greater or lesser degree.

Category (see also Section 2.3.4).	Needs help yes/no	Explanation
Injured animals (accident, traffic, wind turbines, high- voltage power lines, caught by pets, etc.)	Yes	Animals that can no longer look after themselves and are not being cared for by others in the population (e.g. parents or group members). Consequently, these animals are in need of help. They can no longer adapt to the situation.
Contaminated animals (e.g. oil spill victims, animals tangled in waste)	Yes	
Weakened and exhausted animals	Yes, but all factors must be considered.	Animals that are weakened and emaciated after a period of food scarcity could be considered to be in need of help ¹⁰ because their condition can be addressed/improved. As well as making a decision about the individual animal, experts must also consider the impact of that decision on the population and the environment in which the animal is present. ¹¹
Sick animals	All factors must be considered.	Sick animals form a separate group. If the disease is caused by a parasite or pathogen, it could be an indication that these animals have a weak immune system. As well as making a decision about the individual animal, it is also necessary to consider the impact of that decision on the population and the environment in which the animal is present. ¹² If the animal is sick because it was poisoned with pesticides, it is in need of help.
Young (not independent) animals that have not yet developed adequate motor skills	Possibly (though usually not), depending on the situation and context	These animals usually do not need help. They can either take care of themselves again after resting for a while or are probably still being cared for by their parents. They can adapt to the situation.
Animals that are over-fatigued (such as migratory birds that have just completed a long flight)	Possibly (though usually not), depending on the situation and context	There are exceptions, but they should be left to the judgement of a specialist (possible exceptions include a young stork that has been blown out of the nest or ducklings whose mother has been run over).

¹⁰ The Nature Conservation Act contains specific provisions about feeding large wild animals (it is banned in principle, unless a provincial authority issues a decision in the context of weather conditions, etc.).

¹¹ Unrestrained population growth as a result of helping these animals will lead to increasingly weak and emaciated animals in the future; giving help now increases the risk for the future. Providing help to emaciated animals can inhibit natural selection. On the other hand, it may sometimes be desirable.

¹² If it has a hereditary basis, helping such an animal would prevent natural selection and thus have a negative impact on the welfare of the population (e.g. lungworm in hedgehogs).

In practice, the majority of rescued animals are birds. The sanctuaries that the RDA spoke to mentioned percentages of 80% birds and 20% mammals. Of the mammals, a significant percentage are hedgehogs; some sanctuaries said that 60–70% of the mammals they deal with are hedgehogs.¹³

2.3.4 *Reasons why an animal may be in need of help*

An animal in need that requires help may have ended up in that situation due to human or natural causes. To illustrate this point, the annexes contain a number of examples, and several possible scenarios were listed in the previous section. In terms of giving help to animals, does it matter how the animal came to be in need? To shed light on the underlying discussions, this section will examine the various debates around this issue.

The first debate that emerges is ambivalence: the fact that the factors considered in relation to an individual animal may be different to those in relation to the population (other individuals) of the same species, of other species or of the ecosystem. An animal in the wild does not exist in isolation. It may function as part of a population, as a predator or prey in an ecosystem or as a source of food or nutrients for other animals and the environment. Sick and weakened animals can also play an important role for other animals. That is why an expert assessment is important in every situation.

Another debate is about whether it makes a difference for our moral duty of care as humans whether an animal is in trouble due to human activity. Should humans always provide care, or only when humans have caused an animal's problems? Or should we provide extra care when we are to blame or pay more for that care? The ability to intervene is also limited by physical and technical circumstances, such as hard-to-reach places and areas, and sometimes by financial possibilities, due to the extremely high cost of a complex operation to rescue an animal. From a moral standpoint, it could be argued that we should not refrain, or should rarely refrain, from intervening for reasons of feasibility – financial or otherwise – when the injury has a human cause.

Setting aside the fact that the animal does not care how it came to be in need of help, it is open to debate whether any 'additional' responsibility and obligations exist when human actions were the cause of the problem. In a similar vein to the 'polluter pays' principle, there could be a 'perpetrator pays' principle. Liability and culpability can theoretically be defended; whoever caused the damage (if clearly present) should pay for the cost of rescue and care for the animal in need of help.¹⁴ At the same time, in practice, it is often difficult to determine how an animal got into trouble. Well-meaning people can also cause problems for animals (e.g. baby birds or hares, when people think they need help).

¹³ This advisory report primarily relates to vertebrates, but the duty of care can also apply to invertebrates: such as a moth on a window pane that has been disorientated by a house's artificial light and needs to be relocated to a dimly lit wooded area.

¹⁴ See also Annex 2.

The RDA has raised several possible moral and other considerations in this report, without itself taking a position. Such a method of thinking about the issue would conflict with the perspective of the animal: for the suffering animal, how it came to be injured or in need of help is irrelevant. Likewise, the reason for the injury is irrelevant for veterinarians and other professionals. The duty of care for animals in need of help (under the Animals Act) indicates that we must help an animal in need, regardless of any human cause of the need. However, the Council wonders whether it would not be better to put more effort into preventative measures (to keep animals from getting into trouble due to human actions). We will return to this issue in Chapter 3.

2.4 The social role and function of rescue and rehabilitation

The role of animal rescue and rehabilitation can be considered both from the animal's perspective and from various human perspectives. The RDA will briefly explain both sides here, to illustrate the background debates around this issue. From the animal point of view, rescue and rehabilitation have an impact on individual animals; they are spared further suffering. A significant number of the animals taken to a veterinary clinic or wildlife sanctuary are euthanised soon after arrival (see also Section 3.3.5). The suffering and death of individuals is prevented, and animals get a second chance if they are returned to the wild. If rehabilitation is not feasible, it is worth wondering whether the welfare of the animals would be too badly compromised if they were rescued/taken to a sanctuary (see also the Policy rules on the quality of rescue and rehabilitation of animal species) and whether leaving them alone or performing euthanasia on site would be appropriate.

Tension may arise, since what is good for the individual is not necessarily good for a population or ecosystem, and vice versa (see also Section 2.4.2). In addition to the debate around whether rescue is desirable from a nature perspective, there is also discussion about whether sanctuaries can contribute to population conservation. When disease outbreaks or disasters occur, animal sanctuaries can contribute to preserving a population. This has happened in the past with seals or following an oil spill. This impact is up for debate (among ecologists). The sanctuaries we interviewed have different views on the issue; some say yes, some no and others that it depends on the species. Some consider themselves as making a direct contribution to preserving populations, while others only see themselves as having an indirect contribution through their role of educating citizens on how to interact with wild animals.

According to sector organisations themselves, one important function they have is keeping a finger on the pulse in terms of monitoring animal diseases and nature management (for hedgehogs, for example). They can report diseases and monitor their spread. As they say, this can also be relevant for zoonotic diseases. Sanctuaries can gauge changes in terms of the animals that are being brought in: are more hedgehogs being brought in because there are so many of them, or is something else going on?

Sector organisations also believe that they make an indirect contribution to respect for and understanding of animals and greater engagement among citizens. They promote attention and support for animals and nature by providing information, education and advice. The aim of such activities is to make people aware of when animals should be left alone and when they should not be approached, such as young hares, fawns and baby birds. For the most part, people want to do the right thing, want to help animals, want to improve animal welfare and want to keep animals from suffering unnecessarily. According to some of the parties that work in the field, the role and function of animal rescue and rehabilitation is not always recognised (particularly by public authorities). In their view, sanctuaries in particular are often dismissed as 'hobby clubs' or 'animal huggers'. They believe that this does not do justice to all of the knowledge and professionalism involved in animal rescue and rehabilitation. Recognition and appreciation, including from the government, is important to the sector. In their own view and in the eyes of citizens, they do a lot of good. In addition to helping animals, many sanctuaries perform a community and social function through voluntary work, daytime activities and offering the possibility of rehabilitation.

2.5 Dilemmas and perplexities

From the interviews with sanctuaries and the conversations with elected officials in the context of the RDA advisory report 'The Role of Local and Regional Authorities in Relation to Animals', a range of dilemmas and perplexities emerged. These are briefly described in this section. The RDA considers ambivalence to be the greatest dilemma, specifically the ambivalence of responding to the desire to help animals while at the same time saying that nature and the animals that live there must be left alone.

Other dilemmas that relate to the 'whether' question of the rescue and rehabilitation of animals in need of help are mentioned below.

In the debate about helping animals in need, 'audience dilemmas' often arise. There are always different opinions in society about the need for intervention. These may arise from ideological views, moral considerations or professional standards. For example, what a citizen thinks is necessary may be different from what a professional knows is necessary or what is best from the animal's point of view. Expectations about the possibility of assistance do not always match up with an animal's perspective. Not all animals can be helped, and it is sometimes better to do nothing, to leave animals alone or to put animals down on welfare grounds.

Next comes the paradox experienced by sanctuaries, that individual sanctuaries or professionals do their very best to patch up animals that are later shot or controlled. This is a dilemma for public authorities too: as a society, should we be investing in both help and control in relation to the same animals? This applies not only to 'native' species that may cause damage but also to exotic species that may be in need of help but are a threat to native species and non-protected animals.

According to the sector, the rescue and rehabilitation of animals is largely treating the symptoms rather than addressing the cause of animal suffering. Is it a waste of time; would it not be better to invest in tackling the causes? It would be better to take a broader view, by protecting habitats and preventing animals from needing help at all (remember the 'hands-off duty', which could be interpreted as 'humans should not interfere/should interfere as little as possible with nature and wild animals').

Other dilemmas mentioned relate to the killing of animals, the feeding of animals, how to deal with animal pests in sanctuaries, animal diseases and zoonotic diseases, and exotic and non-native animals. There is also an issue regarding how 'cuddly' various organisations are, which can give rise to competition between them. A sanctuary for small mammals such as baby hares may enjoy more public sympathy than a bird sanctuary. This creates competition for grants and donations. Sanctuaries are then forced to draw up 'revenue models'.

3. HOW a wild animal in need of help should be helped

In the previous chapter, we outlined whether and when we should help wild animals in need of help. The next question is: how should we do that? This depends on a range of factors. Every situation is unique and requires a specific assessment of the nature and scale of the problem and the help that can best be provided. This requires knowledge and skills. People have empathy for animals in need of help and feel a sense of urgency to provide help, but they lack the knowledge and experience to establish the nature and scale of the problem and assess what help is required. It is best to provide people with general information in advance about the need to seek assistance from an expert, who can assess each situation and decide what the best help would be. A number of areas of concern have been identified in current practice, and these will be addressed in this chapter.

3.1 Different stages and ways of helping

As mentioned in the previous chapter, providing help to animals in need can be looked at from the perspective of humans (what do humans want to happen?) or from the perspective of animals (what does the animal need?). The answer to the question 'how should an animal be helped?', seen from the perspective of the animal, depends on a range of factors:

- its species and stress resilience;
- the severity of the injuries;
- the animal's degree of suffering, short-term versus chronic suffering;
- the extent to which its welfare will be compromised while help is being provided and the likelihood that it could be released back into the wild;
- the situation: the location and circumstances on the ground;
- the proximity of the sanctuary and the travel and waiting time.

Nearly all situations are unique. However, by categorising what it means to be in need of help, as described in Chapter 2, it is possible to clarify the various patterns of help.

In principle, help should always be provided as quickly as possible, in accordance with the situation. Helping wild animals in need involves multiple stages. It starts with an initial consideration of the factors and the response by the person who finds the animal. Animals in need are usually discovered by citizens. It is therefore important that citizens be well informed and aware of how to act when they find an animal in need of help, partly because it is stressful for the animal to be approached by humans. Next comes the initial report, often made by telephone, for example to the 144 call centre or an animal ambulance service, and an initial assessment and response by these organisations (which may or may not include taking action). In these situations, citizens may also call the police, fire service (emergency services) or animal ambulance services or make

a direct call to a sanctuary, veterinarian, public authority or inspection service. After the initial report, if the organisation in question decides to take action, an expert care provider visits the scene, assesses the situation (field triage) and decides what should happen with the animal (whether or not it should be treated and whether it can be released back into the wild). Next comes the transport stage, followed by triage/assessment by sanctuary staff or a veterinarian. This is when decisions about euthanasia or treatment are made, in view of the animal's welfare and the odds of a successful return to the wild. It is a chain of animal assistance with several decision-making stages.

At each of these stages, help can mean different things, to be determined by someone with knowledge and skills. This includes an initial assessment by telephone, advice about seeking specialist help, visiting the location to free a trapped animal, releasing or moving the animal, calling on others for help, rescue, care, permanent shelter or ending an animal's suffering (euthanasia, handling and transport). An expert may also decide that it would be best to **do nothing**. That can also count as help, in terms of the welfare of the animal in question or other animals, or in the interests of the population or ecosystem. That means leaving an animal in need alone, leaving it to die or giving it the opportunity to try to recover on its own; not catching or transporting it, which could cause further stress. Once it reaches the door of the sanctuary, every animal is (usually) taken in. The experts on site then decide on the most appropriate next steps to take. Based on the welfare of the animal and the likelihood of recovery, they weigh up the factors and decide on further treatment or euthanasia. Sanctuaries indicate that many animals die within 24–48 hours of arrival.¹⁵

3.2 Duty to seek expert assistance

From the above, it is clear that people feel a sense of urgency to provide help out of empathy for animals in need and that caring for wild animals in need of help is enshrined in laws and regulations. It is important to always take into consideration the emotions of people who want to help. However, they need to be aware of what they should do in such a situation. Refraining from 'harmful actions' is the general principle, with the specific exception of wild animals in need of help. Providing help is a legal obligation, but it is not permitted to care for wild animals or to catch them without an exemption, knowledge and skills (see also Chapter 2). As a layperson, you may not care for a wild animal in your home.

Accordingly, people should be educated in advance by an expert that they should not touch or move a wild animal in need of help and should instead contact someone with knowledge and skills. By doing so, they immediately fulfil their legal duty of care under the Animals Act. We call this the 'duty to seek expert assistance'. It means not providing unqualified help yourself and instead helping to ensure that the animal receives whatever help is appropriate at that time.

¹⁵ The sanctuaries we interviewed indicated that they keep records of such events.

In the first instance, that means calling the right institutions and potentially sending a photo. The institution will have experts or trained volunteers on hand to help with the next step. The advice may also be to carefully move the animal, so that it can die in peace. Animal ambulance services often ask people to catch animals in need themselves and hold them ready for collection. This is partly out of practical considerations relating to the safety of both people and animals and also based on ambulance capacity. It is also based on the thinking that, if an animal cannot be caught, there is probably not much wrong with it. This is a kind of initial selection for the assessment of whether an animal is in need of help. However, catching an animal yourself is not usually desirable, because it is stressful for the animal and because of the risk that an animal could cause disease or injury; it is also not always possible. Whether this is the best solution depends on a range of factors. Experts can help a citizen to make the right decision in each situation. In some cases, capable citizens can move animals themselves, but in case of doubt, expert help or advice should be sought.

In terms of the 'duty to seek expert assistance', it is important that citizens know what actions they can take by themselves when they find a wild animal in need of help and where they can turn for information and expert assistance (what they should do first).

This means that repeated communication about this duty is important to raise people's awareness. There are several ways to do this, but at the same time, it is important to realise that the provision of information, even if done frequently, has limitations. This, too, will be discussed in more detail in the next chapter.

3.3 Issues in current practice

Annex 5 contains a brief description, based on the interviews conducted, of the current system in the Netherlands for providing help to wild animals. It also sets out the issues that arise in current practice and people's experiences of them. Based on this description, the RDA has identified the following areas of concern.

Exemptions, protocols and quality

- The downside of the necessary professionalisation of the sector is additional requirements and expenses.
- The responsibility for issuing exemptions to sanctuaries now lies with provincial authorities, which means there is a risk of differences between provinces in terms of requirements and quality of rescue and rehabilitation.
- There are no legally established rules for animal ambulance services, nor is 'animal ambulance' a protected phrase. Around the country, there are many differences in terms of the visions and actions of the organisations behind the various ambulance services.

Reporting and follow-up

- For citizens, it is not always easy to work out where to report what. Not everybody knows about the 144 hotline. Citizens do not usually differentiate between captive and non-captive animals, or between pets and wild animals.
- Providing proper information to citizens 'at the front end' of animal assistance, about the need to take action or to do nothing, prevents problems further along the chain due to unnecessary interventions in respect of animals that do not

need help. The RDA believes that it is important to identify the right moments to provide such information throughout the animal assistance chain.

- The RDA believes that not collecting data at all stages of the animal assistance chain is a missed opportunity, as it could provide a picture of the nature and scale of problems. Such data could help to detect disasters, animal diseases, zoonotic diseases and a sudden decline in natural populations.

Transporting animals

- There are risks in terms of quality, knowledge, skills and approach due to the lack of quality requirements and policy rules for transporting animals in animal ambulances.
- Due to the differences mentioned above, citizens do not always know whether they can depend on an animal ambulance service.

Rescue, treatment and funding

- The long-term future of wildlife sanctuaries and the continuity of care and help for wild animals are under threat due to insufficient funding.
- There is tension between nature and animal welfare with regard to animals in need of help.
- There is a great deal of uncertainty in the animal rescue sector about which level of government is responsible for the rescue and rehabilitation of wild animals in need of help.
- The government and some parties in the sector consider it a problem that the wildlife sanctuary sector cannot speak with one voice, for example via an alliance or umbrella organisation.
- There is a widespread need for wildlife sanctuaries to do a better job of communicating and collaborating with each other. Not only in terms of exchanging information, knowledge and experience about the care and treatment of animals in need of help, but also in terms of working together to seek funding.

4. WHO should help a wild animal in need of help?

Wild animals belong to nobody and to all of us. Everyone should provide the necessary care to an animal in need of help, but there are different levels of responsibility. By imposing a statutory duty of care on citizens, it is reasonable to expect that the government would provide the resources to facilitate the execution of the duty of care. In this chapter, we set out parties' obligations, responsibilities, expectations and needs.

4.1 Obligations, division of responsibilities and expectations

In the previous chapters, we identified whether and how wild animals in need of help should be helped and the areas of concern that the RDA has observed in current practice. Of course, the HOW must be linked to the WHO. Who should do what? Who is responsible for what? What expectations do parties have of each other? The table below summarises the findings from the previous chapters in relation to these questions.

Party	Responsibility	Obligation	Expectations
'Everyone' ¹⁶	Animals in the wild belong to nobody, and therefore belong to all of us (<i>res nullius</i>). Even though animals are nobody's property or possessions, there is still a responsibility towards them due to the duty of care/duty to provide help.	'Everyone' in the Netherlands is required to provide the necessary care to animals in need of help. 'Everyone' must take sufficient care with respect to Natura 2000 areas, special national nature reserves, animals and plants living in the wild and their immediate habitats.	Responsibilities for animal welfare and animals in the wild lie with various parties. What can we expect from uninformed/unqualified citizens acting in situations where animals are in need? This determines which system is the most appropriate for helping animals, how it should function and be funded and what facilitation is required.

¹⁶ 'Everyone' means both citizens and the government.

Party	Responsibility	Obligation	Expectations
Citizens	Duty to seek expert assistance	<p>The legal obligation cannot go beyond what people can reasonably manage.</p> <p>After the initial help, the duty of care is fulfilled. Then another person or organisation takes over the duty from the citizen. This is something that must be arranged by all of us, as a community. We cannot insert a duty of care in a statute and then collectively do nothing about it.</p>	Citizens must be informed about the best way for them to assist animals in need of help (and also what they must NOT do).
Government	<p>Animal welfare primarily lies with the Minister of Agriculture, Nature and Food Quality. Responsibility for nature policy and for the wild animals who live in natural areas primarily lies with the provinces. Provincial authorities also usually handle permits and exemptions for sanctuaries. Under the Civil Code, municipal authorities have an obligation to look after stray animals that are found (by placing them in shelters). They often have agreements with animal ambulance services about transporting animals, including wild animals in need of help that have been found.</p>	By imposing a statutory duty of care on citizens, it is reasonable to expect that the government would provide the resources to facilitate the execution of the duty of care.	<p>The state has imposed a legal obligation. Better facilitation (organisation of finances, institutional arrangements) and/or funding is required.</p> <p>The government must inform its citizens about how wild animals in need of help should be helped.</p>
Experts (reporting, transport, rescue, treatment)	Helping animals from the point of view of the welfare of the animal and the possibility of returning it to the wild.	Meeting the requirements for the rescue and rehabilitation of wild animals. Complying with the Policy rules on the quality of rescue and rehabilitation of animal species.	<p>Citizens expect that animals in need of help will be helped.</p> <p>Experts are required to have professionalism, knowledge and experience.</p> <p>Experts expect support from the government.</p>

What is in the best interests of the animal?

Does the animal care who helps it? Not in terms of which person or party. The individual animal benefits from the prevention of suffering and from receiving proper care. In this regard, the following are important:

- the future prospects for the animal – its quality of life after being rescued;
- receiving the best care;
- professionalism, knowledge and expertise;
- national coverage and uniformity (basic level of quality), regional spread and response times;
- the provision of information to citizens.

4.2 Needs of the parties

The previous chapters showed that there are significant differences in both animal transport and animal rescue and rehabilitation services. However, these services all share a need for:

- more funding, including structural funding;
- mutual collaboration and exchanges;
- unambiguous quality requirements (which, again, depends on the financial picture).

The needs of each party are set out below.

Party	Need	What is required for this, and from whom?
Citizens	<ul style="list-style-type: none"> • Being able to help an animal • Being able to do 'something good' • Acting based on their engagement and feelings 	<ul style="list-style-type: none"> • Local and regional accessibility and availability of animal transport and rescue services • Information about what 'proper help' is and when an animal should not be helped
Experts (reporting, transport, rescue, treatment)	<ul style="list-style-type: none"> • Recognition of role and social function • Sharing of professionalism, knowledge and expertise; collaboration (triage, role and connecting links). • Clarity around funding: a secure long-term future, stable payment structure • More training opportunities • Time for providing care instead of worrying about survival • Sufficient capacity, permanent staff vs volunteers • Options for action in terms of medical procedures • Provision of clear information to citizens 	<ul style="list-style-type: none"> • A good, strong network of sanctuaries and transport services – difference of opinion about whether animals are better helped with a few large sanctuaries or with an intricate network of smaller sanctuaries. • Clarity around responsibilities and government funding. • Setting up a collaboration structure for sharing knowledge and information. • Information campaign for citizens • Medical treatment options

5. Conclusions and recommendations

5.1 Conclusions

The Minister of Agriculture, Nature and Food Quality asked the RDA to answer the question of 'Whether and how a wild animal in need of help should be helped, and by whom'.¹⁷ The advice of the RDA is as follows:

Yes, a wild animal in need of help should be helped, for a variety of reasons. We must help wild animals in need of help on the basis of a legal requirement in the Animals Act (Section 2.1) that states that everyone must provide the necessary care to an animal in need of help. The explanation for this section in the Explanatory Memorandum indicates that this also applies to wild animals. In addition, there is a widely held view among citizens that they have a moral responsibility for the welfare of animals. In previous advisory reports, the RDA examined the ways in which people fulfil their moral responsibility for the welfare of animals (including wild animals) in practice. This responsibility was referred to using the term 'duty of care', which includes all degrees of care (RDA, 2012; RDA, 2017). Animals are living, sentient creatures and have intrinsic value. Directly or indirectly, humans have an impact on the ability of individual animals and animal populations to adapt to the prevailing conditions. That does not mean that all animals must be helped in all circumstances. In nature, animals get into trouble, become weak, suffer and die, due to the actions of predators or otherwise. This is part of the life cycle in the ecological system. The Nature Conservation Act and the Animals Act do not aim to address the suffering of wild animals in natural situations in a general sense. The Nature Conservation Act states that everyone must take sufficient care for animals living in the wild and their immediate habitat and, in principle, should refrain from actions with potentially adverse consequences. In their natural surroundings, wild animals should be left alone wherever possible. The key consideration here is when an animal is actually in need of help and when an intervention is necessary.

If someone encounters a living animal that does not react when they approach or makes feeble attempts to flee, fight or threaten the person, it should at first glance be assumed that this animal can no longer function without help. Whether an animal is in need of help or can take care of itself depends on the ability of the animal to adapt to a specific situation. This can often only be assessed by an expert (in the chain of reporting, transport and rehabilitation of animals). As a rule, animals that are injured or contaminated (from oil, waste, etc.) are in need of help; they can no longer take care of themselves and can no longer adapt to the situation. In the case of weakened, exhausted and sick animals, specific consideration of a range of factors is required, not only at the level of the individual animal but also in terms of the effect on the population and the ecosystem.

¹⁷ Specific answers to the Minister's additional questions can be found in the annexes.
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Young animals and over-fatigued animals such as migratory birds are usually not in need of help and are still able to adapt to the situation. From the point of view of a suffering or other animal, the reason why it is in need of help is irrelevant. The likelihood of a successful return to the wild is critically important.

The duty of care applies to everyone, but not everyone has the same responsibility. Even an ordinary citizen is expected to provide help to an animal that needs it. This help usually consists of what we refer to as 'a duty to seek expert assistance': calling an animal ambulance or other emergency service or calling 144.

In terms of the duty to seek expert assistance, it is important that citizens know what actions they can take by themselves when they find a wild animal in need of help and where they can turn for information and expert assistance (which they should do first). They do not have to catch and transport animals by themselves, and they certainly do not have to care for the animals themselves. The best form of help for an animal in need of help is best determined by a specialist/expert (in the animal assistance chain). This is to ensure not only the welfare of the animal but also the safety of the person who found the animal in need of help. In some cases, capable citizens can move animals themselves, but in case of doubt, expert help or advice should be sought.

By imposing a statutory duty of care on citizens, it is reasonable to expect that the government would provide the resources to facilitate the execution of the duty of care. People have empathy for animals in need of help and feel a sense of urgency to provide help, but they often lack the experience to assess whether and what help is required. It is best to provide citizens with general information in advance about the need to always seek assistance from an expert (often a veterinarian) who can assess each situation and decide what the best help would be.

How a wild animal in need of help should be helped depends on a range of factors. Every situation is unique and requires a specific assessment of the best form of help. This requires experience. Although the various parties that play a role in the chain of assistance for wild animals in need of help have different obligations, responsibilities, expectations and needs, the RDA believes that the central focus should be on the animal. Proper care, a prospect of returning to live in the wild, quality of life and prevention of suffering: these are the things that are important to individual animals. To meet these needs, the RDA believes that the provision of help to wild animals must be improved and that all animals, everywhere, should be able to receive help at the same basic level of quality. There are several hurdles to achieving this aim in current practice, which means animals cannot always receive proper care everywhere in the country. In terms of securing a long-term future and ensuring continuity of care for wild animals in need of help and of the various social roles played by sanctuaries, the RDA has identified two key areas for improvement (from the perspective of animals):

1) The provision of help to wild animals in need of help must be improved

The welfare of the animal and its prospects of returning to the wild must be the central focus. The transport, rescue and rehabilitation of wild animals are carried out by increasingly professional organisations, which are evolving in terms of the quality of their help and care for animals. Citizens need to be aware of what actions they can take by themselves if they find a wild animal in need of help and when an animal actually is in need of help. This means that proper information and education must be provided, either by the government or by an umbrella organisation. It is important for the government to prevent the proliferation of unprofessional sanctuaries in the sector. It can do this through transparency, by defining an ethological, veterinary, legal and moral framework and by organising supervision. The provision of help to animals to fulfil the statutory duty of care must be facilitated by the state. Expertise costs money, for both permanent staff and well-trained volunteers. Policy rules and the quality of provision of help to animals should not be limited to wildlife sanctuaries and should also apply to those who transport animals.

2) All animals, everywhere, must be able to receive the same quality of help

The generally applicable duty of care in the Animals Act applies to all wild animals in the Netherlands. Expert help must be accessible for all animals throughout the country. Differences in vision and approach between regions or due to local levels of commitment can result in unequal help for animals. In such a situation, the place where an animal is found determines whether the animal receives proper assistance, which is undesirable. The existing autonomy and specialisation of sanctuaries in terms of animal species has its advantages, but at the same time, the government should facilitate nationwide coverage and acceptable response times. Citizens should be made aware of where they can find expert help. Broader, repeated communication on this matter will result in greater public awareness. In this communication, it must be made clear when you should and should not help an animal. That can be complex; helping animals is strongly driven by emotion. However, providing some information is better than providing no information. When they find an animal in need of help, many people will search on the Internet to find out what they ought to do. Having accurate information on relevant websites and social media or apps could certainly help. Drawing up a list of dos and don'ts for citizens ('what can I do, what should I do, what should I definitely not do, what is the best way to help an animal') provides information on the actions they can take.

Finding sufficient funding and thus securing a long-term future and ensuring continuity of care and assistance for wild animals in need of help is a major problem that wildlife sanctuaries say they cannot solve on their own.

The central government should facilitate sufficient uniformity and continuity of wildlife rescue and rehabilitation. In view of the regional function of wildlife sanctuaries and provincial authorities' responsibility for nature, it is at that level that support should be provided. Proper enforcement of national conditions and rules is important.

With regard to these areas for improvement, the RDA considers that the government should play a leading role, and it accordingly has the following recommendations to make.

5.2 Recommendations

In the interest of the welfare of wild animals, the RDA recommends that the Minister, **in consultation and collaboration with the sector**, focus on the following three areas to improve the help given to animals:

1) **Ensure continuity: long-term funding for wildlife rescue and rehabilitation**

- The RDA calls on the central government to enter into dialogue with other public authorities and make agreements about their respective responsibilities in the rescue and rehabilitation of wild animals in need of help, including structural financial support from government for wildlife rescue and rehabilitation in the Netherlands.
- Because the regional function of wildlife sanctuaries and the responsibility for nature conservation and granting exemptions to wildlife sanctuaries lies with provincial authorities, making provincial authorities responsible for ensuring structural funding seems like the obvious solution. Provincial authorities could join forces with municipal authorities, a number of which are becoming committed to wildlife rescue and rehabilitation.
- Wildlife sanctuaries have good examples and new ideas of ways in which structural funding could be used (such as a conservation contribution, a professionalisation contribution, costs per animal or a fund). Work with them on the concrete implementation and shaping of the support structure, based on common interests.

2) **Ensure a basic level of quality of help throughout the country**

- The central government has a key role to play in facilitating a national network for uniformity, continuity and a basic level of quality with regard to the help provided to animals.
- National policy rules and quality requirements for the provision of help to animals should not be limited to wildlife sanctuaries and should also be drawn up for those transporting animals and other care providers in the chain. Private certifications and quality initiatives for animal ambulance services should be encouraged and potentially even required, including rules on nationwide coverage and acceptable response times, so that expert help is accessible for all animals in the country.
- The government should play a supervisory role to prevent the proliferation of unprofessional sanctuaries in the sector. It can do this by facilitating transparent rules, defining an ethological, veterinary, legal and moral framework and organising supervision. In relation to animal ambulances, quality improvements can be made by following the above recommendations, through supervision and by adopting a publicly transparent approach.

- An umbrella organisation should be established and should conduct regular consultation with wildlife sanctuaries about the necessary expertise and level of training and ensure continuous monitoring and improvement of help from an animal welfare perspective.

3) Ensure good provision of information and encourage research and the exchange of knowledge

- Citizens need to be aware of when an animal is or is not in need of help, what actions they can take by themselves if they find a wild animal in need of help and where expert help can be found. The government should facilitate the provision of proper information and education. It can do so by supporting the animal rescue sector with its communications or by providing the necessary information itself. Broader, repeated communication on this matter will result in greater public awareness. The provision of information must have a place at all levels in the chain. In addition, accurate and specific information must be present at the 144 call centre and 'triage' control centres to be able to provide specialist advice, including during the follow-up stage.
- If the government facilitates stability and continuity in the sector, the sector will have more scope to give attention to informing, educating and contributing to research. Potential topics for research include trends in arriving animals, the causes of those trends, success percentages of released animals, and animal diseases and their spread. In addition, better data collection by the 144 call centre could add value.

The RDA believes that it is important for harmonisation to occur within the sector and that no significant inequality should exist or arise due to regional differences in terms of the help given to animals. The Council considers that a round-table discussion with public authorities and the sector would be a good next step. Such a discussion could include examples of best practices and examine the additional value of drafting a practical handbook (most important dos and don'ts) for citizens to increase the 'learning effect'.

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Annex 1 Request for advice concerning the duty of care for and rescue and rehabilitation of wild animals

 **Ministerie van Landbouw,
Natuur en Voedselkwaliteit**

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Datum **20 AUG. 2020**
Betreft Adviesaanvraag betreffend de zorgplicht voor en opvang van wilde dieren

Ons kenmerk
DGNVLG-S / 20210333

Geachte heer Staman,

Zoals aangekondigd in de onlangs verstuurde brief aan de Tweede Kamer over de uitvoering van enkele moties en toezeggingen met betrekking tot de opvang van wilde dieren¹ (kenmerk 2020D30659), verzoek ik uw raad om een zienswijze uit te brengen met betrekking tot de vraag of en hoe een hulpbehoevend wild dier moet worden geholpen en door wie. Ambtelijk is hierover reeds met u en uw secretaris van gedachten gewisseld.

Ik wil u vragen om mij de zienswijze uiterlijk het eerste kwartaal van 2021 te doen toekomen.

Voor verdere informatie kunt u contact opnemen met mevrouw Sandra van der Graaf (s.vandergraaf@minlnv.nl) van het Directoraat-Generaal Natuur, Visserij en Landelijk Gebied / Natuur.

Hoogachtend,



Carola Schouten
Minister van Landbouw, Natuur en Voedselkwaliteit

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¹ De term "wilde dieren" wordt hier gebruikt voor dieren behorend tot een van nature in Nederland voorkomende diersoort.

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Annex 2 Letter to the House of Representatives, reference 2020D30659

House of Representatives of the

2

2019–2020 Session

**33
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**Nature
policy**

No.

**LETTER FROM THE MINISTER OF AGRICULTURE,
NATURE AND FOOD QUALITY**

To the President of the House of Representatives of the
States General, The Hague, 28 July 2020

In December 2019, two motions were passed that related to the duty of care for and rehabilitation of wild animals.^{1,2} In addition, during the general consultation debate on animal welfare on 12 December 2019 (Proceedings II 2019/20, No. 36, Item 4), two commitments were made to the House regarding this subject.^{3,4} I am writing to inform the House of the steps taken in response to these motions and commitments.

Shortly after the debate in question, I contacted the bird sanctuary in Naarden with regard to its situation. Following on from that, in December 2019, an initial meeting took place between the Ministry of Agriculture, Nature and Food Quality and a number of wildlife sanctuaries to discuss structural solutions to the issues they were experiencing. These meetings continued in 2020, with animal welfare organisations also being present. It emerged from the meetings that, in addition to financial difficulties, wildlife sanctuaries are also experiencing other issues, such as ambiguities in the regulations.

Below, I inform the House of the steps that I have taken, in consultation with the wildlife sanctuaries and animal welfare

¹ Motion by Members Graus and Wassenberg (Parliamentary Papers 28 286, no. 1079), calling on the government to enter into dialogue with the Association of Netherlands Municipalities and relevant members of provincial executives about their obligation to fulfil their duty of care to wild and/or feral animals.

² Motion by Members Wassenberg and Graus (Parliamentary Papers 33 576, no. 182), calling on the government to develop, in collaboration with municipal authorities, provincial authorities and stakeholders, uniform national guidelines regarding remuneration for local and regional wildlife sanctuaries.

³ My commitment during the general consultation debate on animal welfare on 12 December 2019, to consult with the bird sanctuary and the Netherlands Food and Consumer Product Safety Authority (NVWA) about the case in question.

⁴ My commitment during the general consultation debate on animal welfare on 12 December

I refer to 'wild animals' in this letter, I am talking about animals of a species that occurs naturally in the Netherlands.

1. Duty of care for wild animals and responsibility for the welfare of wild animals

The motion by Members Graus and Wassenberg called on the government to enter into dialogue with the Association of Netherlands Municipalities (VNG) and relevant members of provincial executives about their duty of care to wild animals. Over the past few months, I have held meetings with these parties.

Both the Nature Conservation Act (*Wet natuurbescherming*) and the Animals Act (*Wet dieren*) contain a duty of care with regard to wild animals. In both Acts, the duty of care is imposed, not on a public authority, but on 'everyone'. The duty of care in the Nature Conservation Act (Section 1.11) calls on everyone to take sufficient care with respect to animals living in the wild and to either refrain from actions that could have harmful consequences for animals living in the wild or take steps to prevent the consequences of those actions. In other words, the Nature Conservation Act primarily calls on us to ensure that animals do not get into trouble. In relation to caring for a sick or injured wild animal, the Explanatory Memorandum to the Nature Conservation Act refers to the Animal Health and Welfare Act (*Gezondheids- en welzijnswet voor dieren*), the predecessor of the Animals Act. Of particular note is Section 2.1 of the Animals Act, which applies to all animals, regardless of whether they are captive or live in the wild. In accordance with the first subsection of this section, it is prohibited to cause an animal pain or injury or to harm the health or welfare of the animal without good reason, or in excess of what is acceptable for this reason. In accordance with the sixth subsection of the same section, everyone is required to provide the necessary care to animals in need of help.

In 2012, in its advisory report 'Duty of Care, Naturally',⁵ the Council on Animal Affairs (RDA) considered the questions of what responsibility people and society should have for the welfare of non-captive animals and how that should be defined in practice. The report provided tools to ensure that responsibilities for the welfare of wild animals are consistently defined. According to the RDA, the central question is whether an intervention is necessary at all; this must be answered before considering what action to take. The assessment framework and the accompanying flow chart were primarily intended as a tool for policymakers and land managers who have to make decisions about animals in the wild. This approach is well suited for diligent, measured decisions made in advance but is not suitable for ad hoc decision-making. Accordingly, the advisory report does not answer the question of whether and how a wild animal in need of help should be helped, and by whom. For this reason, I agreed with the wildlife sanctuaries, the VNG, the IPO (Association of Provinces of the Netherlands) and animal welfare organisations that I would ask the RDA to produce a supplementary advisory report focusing on this issue. This request has already been made, and I expect the results early next year. I will share the results with the House.

⁵ <https://www.rda.nl/publicaties/zienswijzen/2012/11/12/rda-zienswijze-zorgplicht-natuurlijk-gewogen>

2. Guidelines on remuneration for wildlife sanctuaries

The Wassenberg/Graus motion² called on the government to develop, in collaboration with municipal authorities, provincial authorities and stakeholders, uniform national guidelines regarding remuneration for local and regional wildlife sanctuaries.

Based on meetings and an inventory of all wildlife sanctuaries, it appears that there are significant differences between sanctuaries, in terms of size, professionalism and the animal species they look after, as well as in relation to expenses and sources of income. This wide variation means that customisation is necessary with regard to the need for and purpose of funding. For this reason, no uniform guidelines can be formulated. Many sanctuaries do require ongoing assistance to secure a long-term future. Accordingly, I encourage municipal and provincial authorities to engage in dialogue with local wildlife sanctuaries to determine what assistance they need. This might not always be a financial contribution; it could be help with raising funds or recruiting volunteers or help with making sustainable investments that could reduce operating costs.

Together with provincial authorities, I have encouraged wildlife sanctuaries to set up a well-organised umbrella organisation to represent the interests of the sanctuaries. Such an organisation could act as a central point of contact for the government, help improve the exchange of knowledge and experience between sanctuaries and strengthen their position. I have also recommended to the wildlife sanctuaries that they work together to provide an insight into the cost of the rescue and rehabilitation of wild animals. It would help provincial and municipal authorities and other financial backers if there were a clear picture of the overall costs of the rescue and rehabilitation of wild animal species. I wholeheartedly support the animal rescue sector taking the initiative to set up a knowledge platform for the sharing of knowledge and information. I will make sure that the outcomes of the actions taken by my ministry are shared with this platform.

3. Additional actions

In addition to financial problems, sanctuaries are experiencing other issues. Together with my dialogue partners, I have identified the actions that I can take in this regard. My intention is to provide sanctuaries with a better and clearer foundation on which to base their activities.

3.1 Amending the policy rules

Under the Nature Conservation Act, sanctuaries need an exemption from a provincial authority to hold protected wild animals. The 'Protocol for the rescue and rehabilitation of non-designated animal species and protected animal species',⁶ which is part of the 'Policy rules on the quality of rescue and rehabilitation of animal species', is currently applied in almost all provinces as a set of requirements for an exemption. In my meetings with sanctuaries, it emerged that what is included in this protocol does not always align with practice. Following this observation, my ministry has identified where the issues lie. The sanctuaries and a couple of provincial authorities are actively working on solutions.

⁶ <https://wetten.overheid.nl/BWBR0037263/2017-01-01-01#Bijlage>

Based on these solutions, I am working on an amendment to the Policy rules on the quality of rescue and rehabilitation of animal species and the associated Protocol. I am doing this in close consultation with the provincial authorities, with the intention that they will refer to the new policy rules when they grant exemptions. I expect to be able to provide the House with information about the timetable for this amendment in the autumn.

3.2 Freedom of sanctuaries to act

In response to the case of the Naarden bird sanctuary, there were many questions from sanctuaries about their freedom to act on their own versus actions that they must always ask a veterinarian to perform. In consultation with the Royal Dutch Veterinary Association (KNMvD) and the wildlife sanctuaries, the ministry has identified those veterinary procedures that are currently reserved for veterinarians. The KNMvD is currently working with sanctuaries and other stakeholders on a proposal for an exception to allow sanctuaries to perform a small number of veterinary procedures under certain conditions, in line with the arrangements for farmers. I expect to be able to provide the House with more information on this subject in the autumn.

The meetings I held with sanctuaries, provincial authorities and other stakeholders were pleasant, informative and constructive. I am confident that the above actions by all parties will contribute to improving the rescue and rehabilitation of wild animals and provide more clarity for sanctuaries.

Annex 3 Equality of animals

Are all animals equal, or are some animals more equal than others?

The working group had a debate, based on fundamental principles, about whether a distinction should be made in this advisory report with regard to the nature of the animals in need of help being discussed. This discussion cropped up in several places in the advisory report but was not given extensive consideration in the final report. Accordingly, by way of illustration, this annex will briefly outline the perspectives that were raised.

Should we restrict any meaningful, concrete action plan to certain animals, such as vertebrates? Or does it also apply to reptiles, fish and even insects? The RDA decided that an attempt to find an answer to this question would be a theoretical, philosophical exercise that, in this advisory report, would not add much to the existing situation in practice. It turns out that, in practice, 99% of rescued animals are vertebrates. Although the question 'what is the definition of an animal' must precede the question 'when is an animal in need of help', the answer would add little to this advisory report.

However, the question is interesting at a higher level, because studies are increasingly finding that the cognitive skills of animals are greater than we had previously thought. Does the distinction between animals make a difference to the extent of help provided? Either at the species level or between individuals within a species? Can we, should we and do we want to draw a line somewhere, and how would that work in terms of the law? In these discussions, there are often other factors involved, such as the rarity of animals, the weighing up of the competing interests of individuals and populations, the 'usefulness' or 'harmfulness' of animals and whether this matters in terms of whether or not we provide help to animals. However, although intrinsically interesting, these questions were not included in this advisory report. As far as the RDA is concerned, whatever the distinction, it makes no difference to the individual suffering animal.

Next comes the question of why we should help animals. The moral, legal and social reasons have already been discussed, but here, too, we can ask ourselves other, more philosophical questions that might be raised in public debate or political discourse. From a historical perspective, helping animals is related to the feelings people have when they find animals in need of help ('a matter of common decency', 'public morality', suffering animals being a 'disturbing sight'). The sense of obligation to help suffering animals can also arise from feelings of guilt, because we may have been the cause of the suffering or because we believe that humans have disrupted nature over a long period of time and that said disruption is the reason why animals need help. Or it may be that we feel genuine compassion for animals and feel emotional at the sight of animals suffering. The same compassion lies behind the current commitment to nature and nature conservation.

There are also people who say that suffering is part of nature. Eating and being eaten. But that usually only applies to the wild and untouched natural areas in which we humans have little part. There, the hands-off duty very much applies, but wild animals in an environment where people play a role automatically become part of our human world.

Annex 4 Reasons why an animal may be in need of help, and liability

Reasons (examples)	
Natural	Food or food shortage, weather conditions, shrinking habitat, fighting, being prey and natural abandonment by parents
Human	Land take, barbed wire, shipping and oil spills, injuries in seals and sperm whales from coming into contact with ship propellers, fishery and the fate of by-catch, wind turbine victims (birds and bats), the transport of electrical energy via high-voltage power lines and birds that collide with these lines, lighthouses that disrupt the behaviour of migratory birds, agriculture: hares and young meadow birds caught in lawnmowers, the poisoning of raptors and other victims of pesticides, road construction and traffic, amphibians, badgers, otters, deer and wild boar that cannot make essential movements or contact with the population to which they belong without crossing a road, birds that collide with traffic or window panes, bites from dogs and cats.

This advisory report by the RDA is primarily about helping wild animals, if they are in need of help. However, the working group also had extensive discussions about fundamental principles, which were not always fully incorporated into the final advisory report. Accordingly, by way of illustration, this annex will briefly outline the perspectives raised during these discussions, concerning the best assistance for animals and the role of preventative measures versus curative measures.

Are animals better served by being given help when they are in need of help – in other words, through curative measures? Perhaps it would be better to invest in preventing them from needing help in the first place, by applying prevention and pre-emptive measures? Which is more expensive: providing care or applying prevention? Consider the investment required for preventative measures, such as building tunnels, wildlife crossings or fences, or changing the design and use of the landscape. This is neither easy nor straightforward. In principle, 'an ounce of prevention is worth a pound of cure'. But what is the best form of prevention, and how far should we go with preventative measures? What can we expect from them? After all, we cannot prevent all suffering, no matter how hard we try. What is required for a natural situation and a properly functioning ecosystem?

Other questions relate to who should pay for which aspect of preventative measures and how poor designs should be corrected. The working group also discussed how sectors that cause suffering on a structural basis (such as electricity companies, wind turbines, owners of oil tankers, roads managed by provincial authorities/the Directorate-General for Public Works and Water Management (RWS), the agricultural sector, etc.) could contribute to assistance for animals in a structural way, which may or may not be sector specific. They could do this through financial measures, such as road and other taxes, innovation funds, insurers, agreements with public authorities or self-regulation with covenants or a fund. This raises the question of whether such companies are 'guilty' or whether public authorities should be asked to impose rules.

At the same time, a wild animal is not your property, or anyone's property, in a way that would give rise to a legal claim. Duty of care, ownership, possession and where the animal was found could also play a role here. The working group thought about whether landowners (manager/owner) could act as a 'temporary carer' of the animal (e.g. in the management and control of shared resources – the 'commons' mentioned in the writings of E. Ostrom). Citizens would then have to inform the landowner. However, the animals concerned are often in public spaces or nature areas, which, as a basic principle, belong to no one. A truly wild animal has no owner, keeper or possessor.

Of course, it is usually known where the animal was found and whose land it was on (and the land is often public property). But it seems quite absurd from a legal standpoint to let landowners claim expenses for animals that do not belong to them. In practice, it is often not determined who caused the suffering. Constantly having to work out who is to blame and on whose land the animal was found could be difficult, particularly for citizens, and give rise to a great deal of finger-pointing and paperwork (not to mention lawsuits, etc.).

Annex 5 Brief description of the current situation regarding the rescue and rehabilitation of wild animals

Exemptions, protocols and quality

To be allowed to rescue and rehabilitate wild animals in need of help, an exemption is required (under the Nature Conservation Act). The granting of exemptions was previously handled by the central government but is now largely within the purview of provincial authorities, due to the devolution of nature policy to the provinces. They are now (largely) responsible for permits and exemptions relating to nature, with a number of exceptions (marine mammals, non-native animal species and exotic species are the responsibility of the Netherlands Enterprise Agency). However, the Ministry of Agriculture, Nature and Food Quality still has a working group on the rescue and rehabilitation of wild animals.

Exemptions for the rescue and rehabilitation of wild animals are subject to minimum conditions and requirements. To obtain an exemption, the following requirements normally apply:

- ...The sanctuary must be a foundation or association.
- ...The goal must be to provide temporary shelter, care and rehabilitation for protected animal species.
- ...The goal must be to return the animals to the wild as quickly as possible.
- ...While in the sanctuary, the animal must be able to behave as naturally as possible.
- ...The sanctuary must have a qualified animal keeper.
- ...The sanctuary must keep a register of every animal or group of animals.
- ...The sanctuary must also have a goal of providing education and discouraging the keeping of protected animal species as pets.

Sanctuaries must comply with the requirements set out in the schedule to the Policy rules on the quality of rescue and rehabilitation of animal species (2015). This document contains rules and quality requirements about objectives, practices (intake policy, housing, care, hygiene, training requirements, the killing of animals, etc.), accessibility and collaboration with other sanctuaries. The quality rules try to meet the needs of the animal/species. For example, because of the stress response, predators should not be housed close to prey animals, and animals in a sanctuary must be given sufficient shelter. The welfare of the animal and the possibility of returning it to the wild are the key principles in the Policy Rules.

In the interviews conducted by the RDA with a number of sanctuaries, it was mentioned a number of times that the establishment of the Policy Rules in 2015 led to an improvement in quality in what was then the 'wild west' of wildlife sanctuaries. The policy rules required a level of professionalism that at the time not everyone was able to meet; as a result, some sanctuaries closed down. According to the people we interviewed, the downside of improving professionalisation is that tightening the rules means more requirements, both practical and administrative. This in turn increases expenses.

Because responsibility for exemptions now lies with the provinces, the interviewees believe there is a risk that differences could arise in terms of the way in which exemptions are issued. This could also result in differences in quality. Previously, the central government was able to obtain an overall picture of sanctuaries in the Netherlands; now, it is more fragmented. Provincial authorities do not always have contact with other provincial authorities to coordinate which and how many sanctuaries are desirable and necessary in their regions. However, the policy rules are often included in the exemption conditions.

It emerged from the interviews that, because there are no legally established rules for animal ambulance services, and because 'animal ambulance' is not a protected phrase, there are many differences around the country in terms of both the practical actions and the visions of the organisations behind the ambulances. There are differences in the quality requirements for each type of ambulance, and there are a number of certifications issued by various organisations, with differences in approach, expertise and level of training. As a result, there is no real unity. In addition, it is not clear to the RDA why wildlife sanctuaries must comply with the government's policy rules and quality requirements, while the government imposes no minimum requirements on animal ambulance services, leaving them to pursue self-regulation through private certification. However, seen from an animal welfare perspective, capture and transport can cause a great deal of tension and stress, and incorrect handling can lead to unnecessary harm to animals. According to the interviewees, there are no general rules or minimum requirements in terms of the level of training; as a result, injured animals are sometimes handled incorrectly. This can include incorrect transport of animals with broken body parts, despite the best of intentions.¹⁸

All of the sanctuaries the RDA spoke to keep a register of incoming and sheltered animals. There are differences in the methods and comprehensiveness of the record-keeping, but it is possible to find out, anywhere in the country, how many animals of what species are taken to sanctuaries each year, what treatment is administered with what drugs and what the outcomes of that treatment are (death, euthanasia, recovery or return to the wild). Most sanctuaries publish annual reports on their websites that include some of these statistics.

Reporting and follow-up

Reports about animals in need of help are received by various organisations in various ways. When someone finds an animal in need, the first step is often to report it. This is usually done by telephone, but reports can also be made using digital methods (for example, via report forms or social media). Telephone reports are made by calling 144 Save an Animal, the national police hotline for reporting animal suffering and animal abuse. However, a citizen/person who finds an animal may instead make direct contact with an animal ambulance service, sanctuary or veterinarian.

¹⁸ Due to the lack of a protected status for the phrase 'animal ambulance', it could, in theory, be misused.

Reports may also be made to other bodies that provide assistance, such as the fire service or Rijkswaterstaat (water management), or reports may be forwarded from 112, the NVWA or the Dutch Society for the Protection of Animals (LID). Other institutions such as nature and animal organisations also receive reports. Miserable birds in boxes are sometimes taken to the reception desk of the national bird protection organisation in Zeist. The organisation has good contacts with local sanctuaries that can provide these birds with further care.

For citizens, it is not always easy to work out where to report what. Citizens do not always differentiate between captive and non-captive animals, or between pets and wild animals, so organisations receive reports about both categories. Depending on the report and the urgency of the situation, reports will be forwarded to the most relevant organisation. This will often be an animal ambulance service, but it may also be the Dutch Society for the Protection of Animals or a specialist sanctuary. For citizens, it is not always easy to work out where to report what. Fortunately, most organisations know how to contact each other.

When should you **not** call 144?

- When you find small dead animals (such as birds and hedgehogs), call your municipality's Environment department.
- When you find dead pets, call the local animal ambulance service and/or your municipality's Environment department.
- When you find large dead wild animals, call 0900-8844.
- For animal nuisance (barking dogs, etc.), call your local police department via 0900-8844.
- For stray cats (whether causing a nuisance or not), call the local branch of the Dutch Society for the Protection of Animals.
- For lost/found pets: call the local animal ambulance service.

The 144 hotline receives around 100,000 calls each year. No statistics are kept on the reports, so it is not known what percentage are about wild animals in need. When someone calls 144, they speak to an operator. The operator has completed in-house training in advance, is connected to a mentor and also undergoes training at the police academy. It takes operators a year to become fully trained, but even once they complete their training, they continue to train and practise in in-house training sessions, when they think extra training is needed to further improve quality. Around 32 people work at the 144 call centre (staff numbers have grown from 11 to 25 FTEs). It is part of a joint call centre, so they work alongside staff answering calls on the 112 hotline and investigation tipline. 144 operators tend to work in the 144 call centre for a long time (longer than 112 operators); some of them have been there since the hotline was launched. In the past, people were hired to work on the 112 hotline first, before being allowed to transfer to 144. Now, people are specifically hired to work on the 144 hotline, and some of them later transfer to 112.

The 144 operator creates a report and forwards it to the appropriate organisation. The operator uses a matrix to determine where to forward the report to. All partners in the chain have agreed on who will take care of what and how a case will be routed; these are internal agreements. The operator completes a report form and sends it to the appropriate party for follow-up. This may be the police (acute cases or criminal offences), the NVWA (agricultural and production animals), the LID (deprivation-of-welfare cases) or an animal ambulance service (small wild animals). If the report concerns a large wild animal, the 144 operator will forward the report to the police operations centre, the police control room or a regional police service centre. For wild animals, animal ambulance services and the police are the only collaborating partners.

The purpose of 144 is not to provide information to citizens, it is to forward reports to the right organisation. It is up to the party following up on the report to record what the report is about, what kind of animal is involved and what follow-up action is taken. If the 144 call centre forwards a report to an animal ambulance service, it does not state in the report whether it relates to a wild or non-wild species. How the report is resolved is also not recorded. The call centre did check how the problem was resolved in one case, but that is not standard practice. Once it has issued the report, its job is done. As with 112 calls, 144 operators only receive notifications; the call centre is not involved in follow-up. It applies the URGENT, NOW, LATER methodology. URGENT means within 15 minutes, NOW means within half an hour and LATER means it can wait until tomorrow. A sheep on its back is an example of an URGENT/NOW report. Animals on roads are a threat to public order; they can create a hazard or obstacle for traffic. Such reports are sent straight to the operations centre. With an URGENT report, there is a warm transfer from the 144 operator to the operations centre.

The Dutch Society for the Protection of Animals has its own call centre. This centre receives tens of thousands of telephone calls per year (75,000 in 2020): some forwarded from 144 and some received directly from citizens. Most calls (60–70%) concern non-captive animals: mainly birds, but also hares, rabbits, hedgehogs and, to a lesser extent, squirrels, mustelids and foxes (in that order).

Amsterdam Animal Ambulance is (at a local level) one of the largest ambulance services in the country. It is an independent organisation and has high name recognition among Amsterdam residents: 93–94% of the citizens of Amsterdam know how to contact it directly. In other regions, there may be multiple ambulance services, and it is not always clear who you should call. Amsterdam Animal Ambulance receives 40,000–50,000 telephone calls per year.

Animal ambulance services and wildlife sanctuaries keep all kinds of data about numbers of animals, what comes in, the nature of the need, possible treatment and the success percentage of animals returned to the wild. By contrast, the 144 call centre keeps statistics about reports but does not know, for example, what percentage of those reports concern wild animals. The RDA believes that not collecting data at all stages of the animal assistance chain is a missed opportunity, as it could provide a picture of the nature and scale of problems. Such data could help to detect disasters, animal diseases, zoonotic diseases and a sudden decline in natural populations.

The people we interviewed believe that providing information to citizens is crucial to ensure animals get the help they need but also to prevent unnecessary interventions in relation to animals such as young hares, fawns and baby birds. Providing proper information 'at the front end' prevents problems further along the animal assistance chain. The RDA believes that it is important to identify the right moments to provide such information at every link in the chain. For example, at present, the purpose of 144 is not to provide information to citizens, it is to forward reports to the right organisation. It is up to the party following up on the report to record what the report is about, what kind of animal is involved and what follow-up action is taken.

Transporting animals

After a report about an animal in need has been made, if the person who found the animal is unable to provide help themselves (or it would not be appropriate for them to do so), the next step is for the animal to be collected for treatment/handling. This can be done on site (freeing a trapped animal, catching and releasing) or in a suitable institution such as a wildlife sanctuary or veterinary clinic (care, treatment, euthanasia). Sometimes, private individuals take animals to a veterinary clinic or sanctuary themselves (estimated in interviews at 20–50% of cases), but wild animals in need are mainly transported by animal ambulances (estimated in interviews at 50–80%).

There are very few legally established rules for animal ambulances, and 'animal ambulance' is not a protected phrase. Many ambulance services are registered with the Chamber of Commerce. You can get a valid exemption simply by putting the words 'animal ambulance' on your vehicle. There are also many different animal ambulance services in the country, which differ in terms of both actions and vision. As a result, there is no real unity. The various ambulance services include:

- the Dutch Society for the Protection of Animals (with approximately 180¹⁹ of its own vehicles);
- the Dutch Federation of Animal Ambulances (FDN), with 30 affiliated animal ambulance services;
- (other ambulance services (run by individuals, associations and foundations)).
- Of the numbers cited above, 150 are sponsored by the Dierenlot Foundation.

There are differences in the quality requirements for each type of ambulance, and there are a number of certifications, with differences in approach, expertise and level of training. The FDN, with which a small number of ambulance services are affiliated, sets quality requirements and criteria for its members, such as being available seven days a week. Several different certifications are available for animal ambulances. Some are more focused on hygiene and the safety of the vehicle, but there are also certifications that take animal welfare aspects into account. How far ambulance services want to go to obtain certification primarily depends on the goodwill of the service concerned. There are also no rules relating to the transporting of patched-up native animals being released back into the wild. Many FDN ambulances have '*Stichting Dierkeur*' certification (initiated by the Dutch Society for the Protection of Animals, an independent foundation).

¹⁹ A total of 25–28 was given in a previous interview, but this was later corrected.

Obtaining this certification means meeting requirements relating to level of training, all aspects of staff safety, hygiene and knowledge of all kinds of animals from birds to reptiles. There are no requirements that must be met for the certification of Dierenlot vehicles. The Dierenlot Foundation is a fundraising organisation that provides materials, money and knowledge to its supporters, which are primarily smaller organisations in the Netherlands. The Dierenlot Foundation is not affiliated with the FDN. Some FDN members drive Dierenlot vehicles. Ambulances operated by the Dutch Society for the Protection of Animals (vehicles + logo) adhere to the Society's own quality standard. The Society supports the FDN with donations but is not itself a member of the FDN.

Funding differs widely from one ambulance service to another. They charge different prices, which can vary from 15 to 75 euros per trip. Animal ambulance services receive payments from a variety of sources. Many municipal authorities have contracts with animal ambulance services (either the Dutch Society for the Protection of Animals or local parties) based on their obligation to look after found animals that are presumed to have an owner (under the Civil Code, they are obliged to hold them for two weeks). Some municipal authorities pay for or subsidise the transport (and sometimes rescue and rehabilitation) of injured wild animals, as an 'extra service' provided by animal shelters, which they see as fulfilling their duty of care. Some municipal authorities mainly provide support by way of grants, some only make verbal agreements and others prefer not to pay anything for this service. There is generally a large portion of costs that are not covered by the government. There are various other types of financial support as well, such as support from citizens, grants, income from sponsors, donations and bequests.

The potential risks from the lack of clear policy rules and quality requirements set by the government for animal ambulances are also set out in Section 3.3.1. Something else that can affect the quality of animal transport, according to the people we interviewed, is the many differences in funding and assistance with expenses. There is generally a large portion of costs that are not covered by the government. Municipal authorities that do have contracts often do not set requirements. According to some interviewees, there are differences in quality, and the parties that are contracted do not always have the same knowledge and expertise, or scope to improve their knowledge. They also do not all have the same opportunities to improve their knowledge, according to some of the people we interviewed. The sector fundamentally comprises volunteer organisations, apart from a few exceptions such as the Dutch Society for the Protection of Animals. According to some interviewees, these organisations are often made up of people who are motivated by passion and have sometimes been driving animal ambulances for 20–30 years. According to some of the people we interviewed, there is not always scope for new insights in the areas of the provision of help to animals, self-reflection and the handover of animals. In one of the interviews, it was suggested that the government could exercise greater control by asking pertinent questions, such as 'How do you train your people?', 'What equipment do you use?', 'What are your onboarding procedures?' and 'How do you ensure worker safety at night – do they head out on their own or in pairs, and what do they do when problems arise?'.

The interviewee believes that asking the right questions can help to build up a clear picture of an organisation, separate from up-to-date knowledge about helping animals, covering such topics as personal protection for workers and things that they are doing well or are not yet doing.

According to several interviewees, these differences can lead to differences in approach. For example, one animal ambulance might go out day and night for every animal, with such a high level of professionalism that it can also provide first aid to people (carrying AEDs and oxygen); meanwhile, another might travel only infrequently, and only for 'cute' animals or a very specific group of animals (a handful fit into this category). Citizens do not always know whether they can count on the latter type of ambulances.

Entry to a sanctuary and treatment

When animals arrive at a wildlife sanctuary or veterinary clinic, the decision-making focuses on whether it will be possible to return the animal to the wild and takes into account the welfare of the animal in the short term (during treatment and rehabilitation) and the longer term (after release). Which animals are promising, and which are not? Providing long-term care for animals that cannot be relocated, that have no species conservation value and whose welfare is compromised by the sanctuary (not intentionally, but as a consequence of being kept there) is not desirable: neither from the perspective of the animal, nor from the perspective of the sanctuary or the law.

In the Netherlands, around 70 sanctuaries are involved in the rescue and rehabilitation of animals taken from the wild. There is a great deal of variety among these sanctuaries, including in terms of:

- **size** – ranging from small sanctuaries that only take a few animals per year to large sanctuaries that take as many as 11,000 animals per year;
- **specialisation and expertise** – some sanctuaries specialise in certain species, such as hedgehogs, squirrels or bats, while other sanctuaries take in animals of multiple species;
- **knowledge, skills and professionalism** – some sanctuaries can draw on many years of experience and ongoing development of that experience, while others are just getting started and are still finding their way;
- **regional spread** – some regions are well served by multiple sanctuaries, resulting in rapid response times for animals, while other regions are less well endowed or have no options at all in the vicinity (Maastricht, for example, collaborates with a sanctuary across the border);
- **history** – some sanctuaries have been around for decades, have a long history, have grown over time and are well known by citizens in their region, while other sanctuaries are newer;
- **organisation** – some sanctuaries have a number of permanent staff members and a large pool of volunteers, while other sanctuaries are completely reliant on a group of volunteers;
- **training requirements for workers** – from comprehensive in-house training to 'learning on the job';
- **financial basis and stability** – as with transport, the sources of funding and financial breakdown are different for each sanctuary, but not a single sanctuary has had a stable financial structure for longer than a year/a few years. Most sanctuaries do not know whether they will still exist next year;
- **contribution to research** – all sanctuaries record information about the

animals that come in and what happens to them. Some record basic information, while others try to keep more detailed records to contribute to research objectives and inform citizens about what happened to 'their' animals. They usually lack the time and capacity to do any kind of research themselves into their recorded data. For example, several sanctuaries said in the interviews that they also keep a record of causes. By way of illustration, here are the numbers for one sanctuary:

- In 2020, 1/3 of incoming animals had been orphaned.
- In 2020, 1/3 of incoming animals were sick (botulism/bird flu).
- In 2020, 1/3 of the animals were injured (windows, dogs, cats).

The sanctuaries know how to contact each other in relation to the treatment of particular animals or exceptional cases. Everyone knows that you go somewhere different for water birds than for birds of prey. They exchange knowledge and information, but also animals. They call each other with questions, have contact via apps and app groups and do not try to reinvent the wheel for new cases. Some consult each other on a regular basis.

There is currently no umbrella organisation for wildlife sanctuaries. A number of attempts have been made in the past to set one up. For example, VOND (the Association for the Rescue and Rehabilitation of Non-domesticated Animals) was founded in 1998; among other things, it drafted quality protocols, contributing to the safeguarding of animal welfare, rehabilitation and returning to the wild, and the professionalism and accountability of sanctuaries. In addition, the BVVN (Dutch Bird Sanctuary Advocacy Group) was founded in 2014 and dissolved in 2017. According to the people we interviewed, these types of initiatives 'bled to death due to a lack of funding' or because they 'were imposed from outside'. The 'stubbornness' of the sector was also mentioned several times. The interviewees consider both themselves and other sanctuaries to be stubborn in terms of their ideas about and approach to the rescue and rehabilitation of wild animals. Everyone has their own ways of feeding, caring for and treating animals and has had successful experiences by following those methods. Every sanctuary cherishes its own identity and usually respects the identity of other sanctuaries, even when they do things very differently.

Wildopvang.nl is a new initiative that became a foundation in 2021. Since 2016, it has been trying to bring wildlife sanctuaries together, by improving contact, maintaining relationships and organising ad hoc initiatives to build trust between sanctuaries. The foundation has an online platform, where, for example, sanctuaries can exchange information on bird flu in a closed group. There is also a group for the government.

The larger animal organisations, such as the Dutch Society for the Protection of Animals and the Dierenlot Foundation, are engaged in wildlife rescue and rehabilitation in different ways. The Society runs two sanctuaries and several animal ambulances; it also has its own call centre. The Dierenlot Foundation helps independent sanctuaries with funding and support, in terms of both costs and resources. Every year, it organises a national conference and a nationwide meeting on providing help to animals (both companion animals and wild animals). The Dutch Society for the Protection of Animals and the Dierenlot Foundation keep in touch with each other and hold regular meetings.

In the interviews, some sanctuaries mentioned – although this is certainly not recognised by all sanctuaries – that a transition is taking place, from an ‘older generation’ to a ‘newer generation’ of rescue and rehabilitation. The older generation are the pioneers who have been in the business for 20–30 years and who have ‘survived’ the improvement in quality triggered by the policy rules in 2015. The ‘oldies’ prefer to operate like solitary islands and have little interest in collaboration. The newer generation are more open to widespread collaboration, new/scientific developments in the world of wildlife rescue and rehabilitation, best practice and learning from foreign professional experts and organisations and are more eager to learn in general.

At present, subsidies for wildlife sanctuaries are scarce. The central government contributes nothing. There are three provinces that provide financial support to sanctuaries in their region: North Holland (100,000 euros per year, for 2020 and 2021), Limburg (covers the cost of transport to a sanctuary in Belgium) and Utrecht (50,000 euros per year from 2020, of which 10,000 euros is an emergency fund and the rest is dedicated to professionalisation and improvements). In the past, the province of North Brabant also provided financial support for a while to an alliance of sanctuaries that had banded together to seek funding. Contributions from municipal authorities vary greatly: from no contribution at all, to financial support for a sanctuary in the municipality, to agreements and contractual arrangements between sanctuaries and various municipal authorities on whose behalf they shelter animals. Most sanctuaries provide assistance to animals from multiple municipalities, and not all of those municipalities contribute. According to the interviewed parties, most municipal authorities make no contribution.

Finding sufficient funding and thus securing a long-term future and ensuring continuity of care and assistance for wild animals in need of help was cited in the interviews as the biggest problem sanctuaries face. The RDA discovered in the interviews that none of the sanctuaries it interviewed had had a stable financial structure for longer than a year, or sometimes a few years. Most sanctuaries do not know whether they can continue to exist.

In the interviews, there was a lot of discussion about who should do what in terms of support from public authorities for wildlife sanctuaries. Wildlife sanctuaries often stress their regional function and suggest that provinces, which are responsible for animals in the wild and for exemptions for sanctuaries, have and should take more responsibility than is currently the case. For sanctuaries, the fact that the task is taken care of is more important than who does it and who pays for it. According to the interviewees, in terms of responsibility and funding, municipal authorities frequently point the finger at provincial authorities and vice versa; provincial authorities themselves do not always consider the rescue and rehabilitation of wild animals to be their responsibility, since, in their view, it does not contribute to their responsibility for the survival of populations and species. In the view of the RDA, there is tension in terms of ideas about nature and animal welfare. Animal welfare is not always the same thing as species protection, and vice versa. Some sanctuaries agree that they do not directly contribute to population conservation, but others see added value in the rescue, rehabilitation and release of animals. However, they all agree that the rescue and rehabilitation of wild animals indirectly contributes to increasing the knowledge and understanding of citizens around wildlife and nature. In this way,

people become involved with animals that live nearby and, in their view, can actively contribute.

According to most of the people we interviewed, the independence of the individual wildlife sanctuaries sometimes makes it tricky to speak with one voice as a sector. Most sanctuaries are not comfortable with another organisation claiming to speak on behalf of all sanctuaries. Wildlife sanctuaries need to do a better job of communicating and collaborating with each other. Not only in terms of exchanging information, knowledge and experience about the care and treatment of animals in need of help, but in terms of working together to seek funding. When sanctuaries have joined forces at a local/regional scale to get government grants, it generally seems to have been successful. According to the interviewees, sanctuaries appear to be working together more often than in the past, but they are still mainly working on the issues of the day. "That's not surprising if you don't know whether you will still exist tomorrow, and every day, there are new animals on your doorstep for you to deal with" (quote from an interviewee). As a result, alliances rapidly fall apart. A single director or umbrella organisation was suggested in the interviews, who could help sanctuaries to look beyond their day-to-day affairs. A good structure would have to be sought to ensure that such an organisation respects the individual identity of the sanctuaries. For the interviewees, the exchange of substantive knowledge and information would be a particularly important reason to participate in such an organisation.

Euthanasia, release and permanent shelter

The rescue and rehabilitation of wild animals is always temporary and focused on releasing them back into the wild. Permanent shelter is not an option for wild animals, and sanctuaries therefore always take the odds of successful release into account in their triage. For some animals (such as hedgehogs), it is important that they be released into a known area, while for other animals (such as birds) that are better able to choose a home for themselves, it does not matter as much. In any event, animals are always released into safe locations where the animal has the best chance of recovery.

The different sanctuaries that the RDA spoke to mentioned various percentages for successful treatment and odds of release. Overall, the following numbers emerged:

- one in three animals are taken to a sanctuary by animal ambulance, and two in three die or are euthanised.
- In sanctuaries, 30% of animals that are taken in die within 24 hours/in the first few days (by themselves or through euthanasia). Percentages of 33 to 50% were mentioned for overall mortality.
- Most sanctuaries estimate that 33 to 50% of animals are returned to the wild. One was an outlier, at 60–70%. Other sanctuaries consider that such high numbers are simply not possible (or only in specific cases, for sanctuaries dealing with specific species) and doubt that this figure is correct.

When the odds of recovery or successful release are nil, euthanasia is considered. The relevant factors may be weighed at different times, particularly during every successive triage (from finding and reporting to arrival at the sanctuary and treatment). The aim of euthanasia is always to prevent further suffering or a life without dignity on the part of the animal.

Little was said during the interviews about the removal of cadavers, except that it is sometimes a shame that animals are not allowed to be used as food for other animals.

In terms of euthanasia, it is important that it be performed by an expert with sufficient knowledge and experience. In practice, sanctuaries sometimes struggle with this requirement. According to the rules, a veterinarian must be present for each euthanasia, but that is difficult to achieve in practice, given the huge numbers of animals received at each sanctuary. The difficulties relate to both capacity and cost. In addition, most animal-friendly solutions involve more costs. Unskilled and improper methods must be avoided at all times. The Minister requested a separate advisory report from CenSAS on this subject. In 2021, a report was published on suitable methods for the killing of animals by non-veterinarians in wildlife sanctuaries (CenSAS, 2021). The RDA assumes that difficult issues were sufficiently covered in this report and will not discuss them further here.

Composition of the Council

The Council on Animal Affairs (RDA) is an independent council of experts that gives solicited and unsolicited advice to the State Secretary for Economic Affairs and Climate Policy on multidisciplinary issues in the field of animal welfare and health. The RDA comprises scientific experts and professional practitioners, who serve on the Council in a personal capacity, independently and without outside influence.

The draft advisory report was submitted to the entire Council for assessment. As such, this advisory report is a product of the Council as a whole.

Reference suggestion: Council on Animal Affairs (RDA) (2022). Dilemmas in Wildlife Rescue: Caring for wild animals in need of help. The Hague, the Netherlands. 47 pages.

As at 1 April 2022, the RDA had the following members:

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