



Animal Welfare Institute

900 PENNSYLVANIA AVENUE, SE, WASHINGTON, DC 20003 · 202-337-2332 · AWIONLINE.ORG

May 2, 2023

Observatory Programme
World Organisation for Animal Health
12, rue de Prony
75017 Paris, France
observatory@woah.org

Dear WOAHO Observatory members,

We write on behalf of the Animal Welfare Institute, a nonprofit organization based in the United States dedicated to reducing animal suffering and promoting the welfare of animals, including those used in agriculture.

AWI is a member of the International Coalition for Animal Welfare (ICFAW). At a recent ICFAW meeting, the WOAHO Observatory presented the key findings of its annual report and invited members to send feedback on the objectives of thematic studies chosen for 2023, including on the topic of long-distance transport.

AWI has worked on animal transportation issues for decades, and, through lobbying of regulatory bodies, seeks to minimize the negative impacts of transportation on the welfare of farmed animals. To that end, we would like to bring to your attention the routine transportation of young, unweaned calves long distances from Canada to the US and within the US. The structure of dairy production systems in the US and Canada, where producers or facilities that raise “surplus” and replacement dairy calves are located long distances from origin farms, has led to significant numbers of very young calves being transported long distances.^{1,2}

While the US has adopted fitness to transport standards into its regulations covering international animal export, there are currently no regulations that address the fitness of animals transported into or within the country. The only law in place protecting animals during transport provides a maximum road transport time of 28 hours. However, through extensive public records requests, AWI has discovered that there is little to no enforcement of this law, despite evidence that it is regularly violated.³

Through public records, AWI has also discovered the regular shipment of tens of thousands of very young calves, as young as 1-2 days, around the continental US for feeding—with journeys over 1000 miles and up to 2200 miles (1600-3500km) frequently occurring. The length of these journeys, given the distance and the laws governing the hours-of-service of truck drivers, undoubtedly extend beyond 28 hours. A

¹ Creutzinger et al. (2021) Perspectives on the Management of Surplus Dairy Calves in the United States and Canada. *Frontiers in Veterinary Sci.* 8:661453.

² Wilson et al. (2020) Hot Topic: Health and welfare challenges in the marketing of male dairy calves—Findings and consensus of an expert consultation. *J. of Dairy Sci.* 103:11628; Creutzinger et al. (2021).

³ Animal Welfare Institute, *A Review: The Twenty-Eight Hour Law and Its Enforcement* (2022) (available at <https://awionline.org/sites/default/files/uploads/documents/22-Twenty-Eight-Hour-Law-Report.pdf>).

large proportion of these calves are also too young for their navels to have healed,⁴ as recommended by WOAHP Chapter 7.3 *Transport of Animals by Land*. AWI has good reason to believe that these calves are neither unloaded nor fed at any point during the journey.

Additionally, in the past few years the number of imports from Canada of “bob calves” under 21 days old has increased, possibly in response to new Canadian transport regulations that limit the duration of travel and set a minimum age for calves transported and/or sold at auction.⁵ This increase in shipments prompted the United States Department of Agriculture’s Animal and Plant Health Inspection Service (APHIS) to implement a pilot program to facilitate easier import procedures for these calves.⁶ Public records of these imports obtained by AWI give no indication that APHIS officials inquire how long the calves have been in transit nor how much longer they will be in transit after entering the country. These calves appear to be sent primarily to livestock auctions within the US, from which they are then transported again to grower operations.

AWI suggests that WOAHP Observatory focus its in-depth study in part on the health, welfare, and disease control implications (including impact on antibiotic use) of long-distance transport of these calves. Also, to the extent it is within its purview, the committee should also inquire into the possibility that these transports are in contravention of both WOAHP guidelines, as most calves are too young to have healed navels, and of US and Canadian laws covering transport duration.

We appreciate your attention to this issue that affects particularly vulnerable animals. Please don’t hesitate to contact us at adrienne@awionline.org, gwendy@awionline.org, or (202) 446-2153 if you have any questions.

Sincerely,



Adrienne Craig, Esq.
Staff Attorney, Farmed Animal Program



Gwendolen Reyes-Illg, DVM, MA
Veterinary Advisor, Farmed Animal Program

⁴ Roccaro, M. et al. (2022) Navel Healing and Calf Fitness for Transport. *Animals*, 12(3):358.

⁵ In 2020, Canada amended its *Health of Animals Regulations* to prohibit the sale of calves 8 days of age or less through auctions or assembly points, and to prohibit unweaned calves of any age from being transported for more than 12 hours. Canadian producers have acknowledged that the new regulations significantly affect their normal practices in disposing of surplus dairy calves. See Wilson et al. (2020) *supra*.

⁶ Animal Plant Health Inspection Service, USDA, *Update: Import Alert: Pre-Shipment Approval and Destination Inspection for Calf-Only Shipments from Canada* (Feb. 28, 2022) (available at <https://content.govdelivery.com/accounts/USDAAPHIS/bulletins/30c5ab0>)