



Animal Welfare Institute

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June 14, 2023

Dr. Rosemary Sifford
Deputy Administrator Veterinary Services and Chief Veterinary Officer
U.S. Department of Agriculture
1400 Independence Ave., SW
Washington, DC 20250-3700

Dear Deputy Administrator Sifford:

I am writing on behalf of the Animal Welfare Institute (AWI) regarding the Animal and Plant Health Inspection Service's enforcement of its animal export regulations, 9 C.F.R. pt. 91. AWI was founded in 1951 as a nonprofit public interest organization dedicated to reducing animal suffering and promoting the welfare of animals, including those used in agriculture. AWI has addressed issues of animal transport for decades and seeks to minimize the negative impacts of transportation on the welfare of animals.

Through the Freedom of Information Act, AWI regularly monitors animal export operator reports submitted pursuant to 9 C.F.R. pt. 91.12(f). We have previously sent two letters to the USDA regarding our concerns about a significant number of calving related deaths on a vessel transporting pregnant heifers from Delaware to Qatar in the spring of 2020. As you are aware, animals exported from the United States must be fit to travel. Animals considered unfit to travel include pregnant livestock in the final 10 percent of gestation at the planned time of unloading and those that are sick, injured, weak, disabled, or fatigued. 9 C.F.R. § 91.7. If animals are deemed unfit to travel, the APHIS veterinarian is to reject the animals for export. *Id.*

As noted in our previous letter, the high rates of calving (38 or 1.7%), calving-related deaths (17 or 0.76%), and lame and/or downed cattle (91 or 4.0%) reported during the spring 2020 journey suggest these animals may have not been properly evaluated with regard to fitness-to-travel.

Records recently received by AWI again show mortality due to calving on vessels carrying pregnant heifers. First, during a 32-day journey on the MV *Shorthorn Express*, which left Galveston, TX bound for Karachi, Pakistan on February 7, 2022, 54 of the 2239 heifers aboard (2.4%) died of "Pre/Post Partum Illness." Shortly after, on another journey from Galveston to Karachi leaving February 25, 2022, 11 of the 2,624 pregnant heifers (0.42%) died "due to calving and abortions" during their 40-day voyage aboard the *Queensland*.

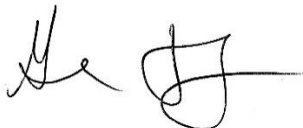
These mortality rates far exceed what is reported in the literature as “average” mortality rates for cattle undergoing voyages of long duration (0.14-0.17%).^{1,2} In addition, since neither of these operator reports reported any live calves being discharged at the destination port, it appears that the true mortality rate for both voyages might have been higher, had the deaths of any calves born alive been included in the total number of deaths.

Possible explanations for these high calving- and pregnancy-related deaths include (1) poor enforcement of fitness for transport requirements, allowing export of pregnant cattle whose expected calving date is less than 28 days after the planned date of unloading, (2) failure to account for the fact that heifers typically have a shorter gestation length than multiparous cows, (3) livestock owners or brokers providing inaccurate information about breeding dates, (4) outbreak of disease causing late-term abortions, or (5) prolonged stressful conditions on-board leading to early parturition and/or a higher incidence of pregnancy-associated diseases. In other words, it appears that either some of the loaded cattle should have been deemed unfit for travel or conditions aboard were deleterious enough to severely harm animal health and welfare.

We request that APHIS Veterinary Services (VS) conduct a thorough investigation of both incidents to determine and rectify the underlying cause of these high mortality rates. We also encourage APHIS VS to review Fitness to Travel requirements with cattle exporters, APHIS inspectors, and private USDA-accredited veterinarians who certified these animals for export. Finally, in light of this trend, we request that APHIS VS provide AWI with any protocols used by APHIS inspectors to confirm that pregnant animals slated for export will not be within the last 10% of their pregnancy at the time of unloading.

Thank you in advance for your consideration; we look forward to your response. Please feel free to contact me at Gwendy@awionline.org or (202) 446-2153 to arrange a meeting with AWI to discuss this issue further.

Sincerely,



Gwendolen Reyes-Illg, DVM, MA
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¹ Moore, S. J., O'Dea, M. A., Perkins, N., Barnes, A., & O'Hara, A. J. (2014). Mortality of live export cattle on long-haul voyages: pathologic changes and pathogens. *Journal of veterinary diagnostic investigation : official publication of the American Association of Veterinary Laboratory Diagnosticians, Inc.*, 26(2), 252–265. <https://doi.org/10.1177/1040638714522465>

² Moore, S. J., Madin, B., Norman, G., & Perkins, N. R. (2015). Risk factors for mortality in cattle during live export from Australia by sea. *Australian veterinary journal*, 93(10), 339–348. <https://doi.org/10.1111/avj.12355>