



Animal Welfare Institute

900 Pennsylvania Avenue, SE, Washington, DC 20003

August 27, 2021

The Honorable Thomas Vilsack
Secretary of United States Department of Agriculture
1400 Independence Ave., SW
Washington, DC 20250-3700

Dear Mr. Secretary:

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.

In a letter to the USDA in June 2020, AWI expressed concerns regarding high mortality and births on some cattle shipments from the United States. AWI recently received a response to a Freedom of Information Act request for animal export operator reports. We would like to commend APHIS for requesting that the shipping company provide an assessment and description of preventative actions in response to a report of high mortality (207 deaths, or 9.28% of animals shipped) on the vessel *Holstein Express* during a February/March 2020 journey from Wilmington, Delaware, to Qatar.

However, the records suggest that the USDA may have been able to prevent a significant proportion of the mortality on that shipment. According to the inspection regulations, animals should not be approved for export unless fit to travel, which excludes 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.*

The high rates of calving (38), calving-related deaths (17), and lame and/or downed cattle (91) reported during this journey suggest that fitness-to-travel criteria for these animals may not have been properly evaluated by the port veterinarian. It may also indicate that the condition of some of the animals was compromised at the time of loading.

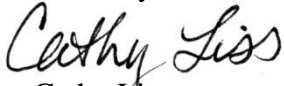
For example, it appears that dozens of heifers were in the final stages of pregnancy when loaded onto the *Holstein Express*. The shipper's report indicates that by day 21, over 27 calves had been born, and by the end of the journey, 38 calves had been born. Additionally, it was noted that 20 fewer heifers were loaded onto the vessel than originally chartered due to their size, another indication of advanced pregnancy. These facts strongly suggest that heifers were certified for export despite not meeting fitness-to-travel criteria. Given the potential impact of the port

veterinarians' inspection, APHIS should ensure that its staff are making appropriate fitness-to-travel determinations.

Further, given the large number of animals that perished on this shipment due to heat stress (46 deaths, or 2% of cattle on board), APHIS may wish to consider revisions to existing regulations and guidance, such as lowering stocking densities, to better provide for animal health and welfare. Since this level of mortality occurred in the milder months of February and March, and without substantial deviation from existing USDA requirements, the regulations may not be adequate to prevent adverse consequences of higher temperatures and/or humidity.

Thank you for your consideration. If you have any questions or would like to arrange a virtual meeting, please contact me via email at cathy@awionline.org or by phone at 202-446-2121.

Sincerely,

A handwritten signature in black ink that reads "Cathy Liss". The signature is written in a cursive, flowing style.

Cathy Liss
President

Attachment

cc:

Mr. Kevin Shea, Administrator, USDA-APHIS