



Animal Welfare Institute

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The Animal Welfare Institute (AWI) is pleased to submit the following comments on OIE Terrestrial Animal Health Code draft chapters “Animal Welfare and Broiler Chicken Production” and “Animal Welfare and Beef Cattle Production Systems”.

I. Background

Since its founding in 1951, AWI works to reduce the sum total of pain and fear inflicted on animals by people. We seek to achieve humane husbandry, handling, transport and slaughter for all animals raised for food. AWI’s Animal Welfare Approved (AWA) certification program has the most rigorous standards for farm animal welfare currently in use by any United States organization. The premise of AWA standards is that animals must be allowed to behave naturally, and the standards allow animals the opportunity to perform natural and instinctive behaviors essential to their health and well-being. Provisions are made to ensure social interaction, comfort, and physical and psychological well-being. AWA standards have been developed in collaboration with scientists, veterinarians, researchers and farmers across the globe to maximize practicable, high-welfare farm management. The following proposed language and general comments are based on AWA standards and technical papers and are consistent with the OIE mandate to “take the lead internationally on animal welfare.”

II. AWI Comments on “Animal Welfare and Broiler Chicken Production”

Commercial Broiler Production Systems

Proposed Language:

Birds must not be kept in cages or on wire, mesh or slatted floors.

Confinement systems, in-house or field-based pens or cages, are prohibited.

Animal Health Management/Preventative Medicine/Veterinary Treatment

Proposed Language:

Each farm must have a health plan addressing: avoidance of physical, nutritional or environmental stress, climatic considerations, vaccinations and other methods to cope with prevailing disease challenges, bio-security measures, nutrition, environmental impacts including manure management and run-off, ranging and foraging management, exclusion of predators and control of rats and mice and euthanasia.

Vaccines must be used where appropriate to decrease the incidence or risk of disease on farm. Any sick or injured birds on the farm must be treated immediately to minimize pain and distress. This must include veterinary treatment if required.

If alternative treatments are not suitable or not effective or if a veterinarian has recommended antibiotic treatment, this must be administered. Withholding treatment in order to preserve a bird or flock's eligibility for market is prohibited.

A safe place must be provided for sick or injured birds to recover, free of competition. Injured birds must only be kept separate from the flock until such time they can rejoin the flock without adversely affecting either the health or welfare of the individual or the flock. The non-therapeutic use of antibiotics to control or prevent disease or promote growth, or any other kind of substances as growth promoters is prohibited.

Thermal Environment

Proposed Language:

Structures housing birds must be well-insulated with internal temperature and humidity controls, either natural or mechanical.

Lighting

Proposed Language:

In housing, birds must not be subjected to dim and/or continuous lighting or kept in permanent darkness. Housing must be kept at an average of at least 15 lux in daylight hours. Shelters and housing must be constructed with windows or openings that allow natural daylight and circulation of air and allow the birds to experience natural light patterns. Use of artificial light is permitted as long as it does not exceed a maximum day-length of 16 hours. Artificial light must be distributed evenly. Lighting may not be kept artificially dim or bright.

Air Quality

Proposed Language:

Shelters and housing must be well ventilated and allow fresh air to enter.

Nutrition

Proposed Language:

Chickens must have constant, free access to clean, fresh water at all times. Food and water must be distributed in such a way that it minimizes competition. There must be a written chicken feeding plan that will guarantee a varied, well-balanced and wholesome nutritional regime that meets the optimal nutritional requirements of the age, breed and size of the birds on the farm. Birds must always have access to insoluble grit. Birds must be able to pass the grit into the gizzard. Feeding chickens eggs, avian and/or mammal protein or other animal by-products is prohibited.

Flooring, bedding, resting surfaces (litter quality)

Proposed Language:

Litter must be provided from placement of chicks. In stationary and mobile housing bedding must be available to chickens at all times. Bedding must be kept in a dry, mold-free, friable condition and replenished as necessary.

Stationary housing and shelters must have solid floors. Floors may be natural – the surface of the ground or pasture – or artificial. Existing mesh or slatted flooring areas may be covered to create the equivalent of a solid surface.

Mobile housing may have wire mesh or slatted flooring for laying hens, as long as hens are only confined to the house when perching at night.

Social Environment

Proposed Language:

The indoor and outdoor environment must allow the birds to exhibit their normal physical and social behaviors including self-isolation and must enable positive social interaction among the birds.

All chickens must have access to dust baths and areas of retreat both in the house and out on range. Meat chickens must have access to raised areas from four weeks of age.

Stocking Density

Proposed Language:

Birds must be maintained in stable groups of a suitable size to uphold a well-functioning hierarchy. Introduction of new birds to a group should be avoided, but if necessary, it must be carefully managed and supervised. Chickens kept together must be carefully monitored to minimize fighting, feather pecking and other negative behaviors, and necessary steps must be taken to protect birds from harm.

Chickens should not be kept in flocks of more than 500 birds. Flock size is a factor that has been shown to affect the occurrence of negative behaviors such as feather pecking and cannibalism.

Shelter and housing must be sufficiently spacious to allow all birds to move freely, stretch their wings and engage in natural behaviors. Chickens must at all times have adequate space to socialize, fly, walk, stretch, look for food and water, scratch the ground, and dust bathe.

The following space allowances are recommended.

Minimum indoor area:

Type of bird: Space per bird

Meat chicken: 1 sq. feet/0.1 sq. meters

Pullet: 1 sq. feet/0.1 sq. meters

Breeder: 1.75 sq. feet/0.16 sq. meters

Outdoor Areas

Proposed Language:

In weather that does not pose a risk to bird health, chicks and pullets must have outdoor access from four weeks of age. Rodenburg *et al* (2004) showed that the earlier birds are introduced to the range the better they use the range in later life. Structures and outdoor areas must encourage birds to go outside in the hours of daylight. There must be more than one entry and exit open at any time to allow birds free access to outside. Openings must be large enough to allow at least two birds to pass without touching. There must be no obvious obstructions that would prevent birds from seeing the exits.

Chickens over the age of four weeks must only be excluded from ranging and foraging areas in emergency situations or extreme weather conditions where the welfare of the birds would otherwise be affected. If disease threat or inclement weather requires hens in mobile houses to be confined during the day, any mesh or slatted flooring aside from that directly around drinking

areas must be covered. When chickens are excluded from ranging and foraging areas at times of disease risk or inclement weather, they must be provided with vegetative material so that they can engage in foraging behavior.

The amount of outdoor area must be such that the health of the birds as well as range and vegetation quality is maintained. The ranging and foraging area must be well drained and clean. A ranging and foraging management plan must be in place that addresses the specific farm site. It must demonstrate that paddocks are an appropriate size and layout to ensure that: chickens have access to growing green vegetation on the range whenever conditions allow, the composition of the ranging and foraging areas does not inadvertently create health problems for chickens, ranging and foraging areas are not denuded by overuse and other management techniques, the location of water, shelter, and feeders is addressed, non-point pollution and other local environmental standards are being met and ranging and foraging areas that have been used, worn out or denuded are restored.

Sufficient ranging and foraging area must be provided such that the bird's activities do not lead to more than 20% of the range being denuded. The birds must be able to scratch and seek nutrition from the range. The ranging and foraging area must provide birds with access to a rich variety of vegetation and green plants that are rich in calcium and other vitamins. Clean drinking water must be continuously available to birds on range. Areas of retreat or cover must be available close to the birds and provided in a manner that encourages ranging behavior and ensures maximum use of the ranging and foraging areas available.

Protection From Predators

Proposed Language:

The roof and sides of housing and shelter must provide a barrier to predators. On range, birds must be protected from the immediate threat or fear of aerial predators.

In the event that exclusion is unsuccessful and predation remains an issue, live trapping may be used. Live traps must be checked twice daily. All other forms of traps are prohibited. All snares and leg hold traps are prohibited. The use of poisons against predators is prohibited. If live trapping is not possible or is not successful, lethal control of specific animals may be carried out. All lethal control/euthanasia of predators must result in instantaneous irreversible unconsciousness and death. If a predatory animal has been euthanized to protect the animals on the farm, there must be records kept of the species in question, number of animals, and euthanasia method.

Genetic Selection

Proposed Language:

Birds who have undergone genetic selection to the point that their welfare is negatively affected should not be kept. Birds must be chosen with consideration of their ability to thrive in the prevailing climatic conditions of the farm. When averaged of their entire lives, the rate of growth of birds allowed to grow naturally on an optimum ration must not exceed 0.075 lbs (34 g) per day. Birds derived from standard, pure breeds are recommended as are the use of dual purpose breeds so that male chicks can be raised as meat type birds and female chicks can be raised as laying hens. Cloned or genetically engineered birds, breeding stock and semen are prohibited.

Painful Interventions

Proposed Language:

Farmers must proactively manage birds so they do not express unnatural behaviors resulting from confinement and the inability to express natural behaviors. Researchers have shown that good use of range can help to avoid welfare issues such as feather pecking and feather pulling.

Physical alterations are prohibited including: de-beaking (beak clipping, tipping and trimming), de-clawing, de-spurring, de-toeing, hole punching, pinioning, notching, wattle trimming, comb trimming and castration (caponizing) of chickens. The use of goggles is prohibited.

Individual identification may be undertaken provided that the method used does not cause injury to the bird.

Handling and Inspection

Proposed Language:

All birds must be thoroughly inspected at least twice per 24 hours. During this inspection, the welfare of each bird must be observed. In any chicken is not in a state of well-being, the bird must be cared for immediately and corrective measures must be taken. During a time of increased risk to health and welfare, inspection must be increased as necessary to protect the bird's well-being. Actions must be taken to treat lameness and to remove any causes of lameness. Inspection of chickens must be possible at any time day or night. Throwing chicks or mechanical moving of chicks from delivery containers is prohibited. Individual birds may be caught in daylight for required treatments or inspections.

On Farm Harvesting

Birds should have constant access to water. Birds must be caught in darkness. Birds must be caught with a minimum of chasing. Birds must be carried upright with support under them. Birds must not be picked up or carried by their legs. Handling and catching must only be done by competent persons able to complete these actions without causing injury or undue stress. Hired catching teams must have completed training on humane methods of chicken handling.

In the event a chicken suffers accidental injury during catching, the bird must receive individual treatment to minimize pain and suffering immediately. Sick, injured and/or suffering birds discovered during the catching process who are not expected to recover must be euthanized.

Humane Killing

Proposed Language:

Birds experiencing pain or suffering from which they are unlikely to recover must be immediately and humanely euthanized on the farm. Euthanasia must be carried out in a manner that renders the bird immediately insensible to pain. Euthanizing birds in a way that poses unnecessary pain or suffering is prohibited. Prohibited methods include: Suffocation and blow to the head by blunt instrument (this should not preclude the use of percussive poultry killers that are specifically designed for the humane slaughter of birds).

When local or national authorities order the killing of a flock of birds or if any large-scale euthanasia is about to take place to eradicate disease the event must be supervised by a veterinarian, government authority and/or poultry expert to ensure that the proper euthanasia

protocol and humane handling procedures are being followed. Using two-stage or non-aversive Controlled Atmosphere Killing (CAK) is strongly recommended.

General Comments

OIE's draft chapter on "Animal Welfare and Broiler Chicken Production" is incompatible with OIE's "Guiding principles for animal welfare" contained in Chapter 7.1 of the Terrestrial Animal Health Code. Furthermore, the draft chapter fails to satisfy the "Five Freedoms" on numerous counts. With few exceptions, the proposed guidelines are essentially synonymous with industrial broiler production and entrench the status quo. Standards for chickens raised for meat which aim to promote animal welfare and well-being must ensure that the animals be allowed to behave naturally. OIE should promulgate standards that allow chickens the opportunity to perform natural and instinctive behaviors essential to their health and well-being and include provisions to ensure social interaction, comfort, and physical and psychological well-being. Considering the worldwide implications of OIE guidance and to achieve OIE's priority of animal welfare, the draft standards need to be significantly strengthened prior to adoption.

III.AWI Comments on "Animal Welfare and Beef Cattle Production Systems"

Animal Health Management

Proposed Language:

It is recognized that proper health and management planning increases both positive welfare and productivity. A health plan emphasizing prevention of illness or injury must be prepared in consultation with the farm's veterinarian to promote positive health and limit the need for treatment. It must address: avoidance of physical, nutritional or environmental stress, climatic considerations, vaccinations and other methods to cope with prevailing disease challenges, bio-security measures, nutrition, environmental impacts, including manure management and run-off, pasture management, exclusion of predators and euthanasia.

All animals must be thoroughly inspected at least once per 24 hours. During this inspection, the welfare of each animal must be observed. If any cattle or calf is not in a state of well-being, the animal must be cared for immediately and corrective measures must be taken. During a time of increased risk to health and welfare, inspections must be increased as necessary to protect the animal's well-being.

Vaccines must be used where appropriate to decrease the incidence or risk of disease on farm. Any sick or injured animals on the farm must be treated immediately to minimize pain and distress. This must include veterinary treatment if required. If a veterinarian has recommended antibiotic treatment it must be administered. Withholding treatment in order to preserve an animal's eligibility for market is prohibited.

Cattle and calves must not be kept in isolation unless briefly required, for veterinary procedures or to recover from an illness or injury. A safe place must be provided for sick or injured animals to recover, free of competition. Injured animals must only be kept separate from the herd until such time they can rejoin the herd without adversely affecting either the health or welfare of the individual or the herd. The primary enclosure for temporarily single-housed cattle must be of such a size to allow the animals to comfortably turn around, stand up and lie down fully without touching the enclosure. Temporarily single-housed cattle should have visual and auditory

contact with other cattle. At minimum, pens used for the treatment of sick animals must be cleaned between each use.

The non-therapeutic use of antibiotics, or any other medicines, to control or prevent disease or promote growth, is prohibited. Implanted or injected growth hormones or the use of any other substances promoting weight gain are prohibited. Routine use of substances to induce estrus (heat) is prohibited.

Regular pasture rotations and proper bedding management and removal must be the primary method of preventing parasitological infestations. If prevention has not been effective, medicine regimens must be implemented to effectively control worms, lice, mange and any other parasites.

Environment

Proposed Language:

Shelter may be provided by natural features such as shade, trees, or by buildings. Housing may also be used as shelter. Cattle and calves must have continuous access to housing or shelter that protects them from weather extremes, including high winds, sleet and heavy snows, and sun in climatic regions where high temperatures may negatively impact their welfare.

Shelters and housing must have solid floors. Floors may be natural or artificial. Cattle at all times must have an area available that provides dry footing so they are not forced to stand in mud or manure. Manure must be removed from housing or shelters on a regular basis. The house or shelter must be monitored to avoid odor, dampness and mold. Liquefaction of manure and liquefied manure handling systems are prohibited. Any close confinement in crates or tethering is prohibited. Temporary close confinement, which may be required for vaccination, weighing, feeding, marking or veterinary procedures, is permitted as long as the animal is not confined for more than a half hour.

Lighting

Proposed Language:

Shelters and housing must allow natural light to enter.

Air Quality

Proposed Language:

Shelters and housing must be well ventilated and allow fresh air to enter.

Nutrition

Proposed Language:

Cattle and calves must have free access to clean, fresh water at all times. Cattle and calves must have a feeding plan that will guarantee a varied, well-balanced and wholesome nutritional regime appropriate for their age. Food and water must be distributed in a way that minimizes any competition. A significant and consistent roughage component must be provided in the diet through all stages of an animal's life to ensure proper rumen function. The minimum requirement is 70 percent long fiber roughage/forage on a daily dry matter basis from weaning onwards. Any changes in diet must be carried out gradually to minimize rumen problems. A pasture management plan and nutritional regime must take into account the added nutritional requirements of lactating cattle. Feeding meat or animal by-products is prohibited.

Feedlots and other types of confinement feeding operations are prohibited. Where finishing systems involve grain feeding for the final fattening stage, access to pasture for cattle to engage in normal foraging and grazing behaviors and sufficient dry matter forage in the diet to maintain proper rumen function are required.

Calves must be provided with colostrum within the first six hours of birth. Milk replacer containing antibiotics, growth promoters and/or any animal by-products aside from milk protein, is prohibited. All calves must have continuous access to high quality forage from seven days of age onwards. Access is recommended from day one. Any bunk feed provided must take into account the growing use of the feed by calves as they mature.

Flooring, bedding, resting surfaces (litter quality)

Proposed Language:

In housing, bedding must be available to cattle and calves at all times. Bedding must be clean, dry, and mold-free and replenished as needed. Bedding must be provided in sufficient quantities to ensure the comfort of cattle and calves. All flooring used by the cattle must provide good traction, be well drained, and kept clean and free of ice in the wintertime.

Stocking Density

Proposed Language:

Housing or shelter must provide: sufficient space for all animals in the herd to lie down and move around without touching each other if they choose and find shelter at the same time, a means for feeding cattle and providing water in a sheltered environment in extreme weather and entrances sufficiently large that animals can exit and enter at will without the risk of dominant animals stopping lower ranking individuals from using the house or shelter.

In housing and shelter the following space requirements are recommended.

Minimum indoor bedded lying area:

Calves up to 220lbs (100kg): 16 sq. feet/1.5 sq. meters

Cattle between 220-440lbs (100-200kg): 27 sq. feet/2.5 sq. meters

Cattle between 440-770lbs (200-350kg): 43 sq. feet/4.0 sq. meters

Cattle between 770-1100lbs (350-500kg): 54 sq. feet/5.0 sq. meters

Cattle over 1100lbs (500 kg): 11 sq. ft per 100kg live weight/1.0 sq. meters per 100kg live weight

Minimum additional loafing area – that need not be under cover or bedded:

Calves up to 220lbs (100kg): 12 sq. feet/1.1 sq. meters

Cattle between 220-440lbs (100-200kg): 20 sq. feet/1.9 sq. meters

Cattle between 440-770lbs (200-350kg): 32 sq. feet/3.0 sq. meters

Cattle between 770-1100lbs (350-500kg): 40 sq. feet/3.8 sq. meters

Cattle over 1100lbs (500 kg): 8 sq. ft per 100kg live weight/0.75 sq. meters per 100kg live weight

Outdoor Areas

Proposed Language:

Continuous outdoor pasture access is required for all cattle and calves. Both extensive grazing and rotational grazing systems are permitted. The amount of outdoor area must be such that the health of the cattle and calves and pasture quality is maintained. A pasture management plan

must be in place that addresses the specific farm site. It must ensure that: the nutritional requirements of the animals can be adequately met through grazing and appropriate supplementation, the composition of the pastures does not create health problems for cattle, cattle and calves are able to graze fresh, clean pasture that has not become polluted with manure, pastures are not denuded by overgrazing and other management techniques, appropriate paddock size and grazing frequency is assured, the location of water, shelter, and feeding bunks is addressed, non-point pollution and other local environmental standards are met and pasture areas on which cattle have been out-wintered or that are otherwise worn out or denuded are restored.

Cattle grazing pasture with high levels of clover and other legumes must be managed to avoid bloat. Cattle and calves must have access to a rich variety of vegetation including green plants that are rich in calcium and other minerals. Cattle and calves must have unobstructed access to land that is well drained, clean, varied and has properly managed vegetation and species-suitable herbaceous matter so that the herd's food-seeking behaviors can be satisfied. The animals must be able to explore the ground and their natural environment, as well as be able to exercise and engage in social interactions. The application of pesticides and herbicides on areas being grazed by cattle is prohibited.

Cattle who have been properly selected for the specific climate conditions will voluntarily choose to go outdoors in all but the most extreme weather. Therefore, a properly designed system for out-wintering cattle must be in place. Such a system must have the following components: Cattle must be fed from bunks, hay feeders, or uncontaminated groundcover on pasture lands or in a sheltered area, in all but the most severe weather conditions. Sufficient access to the feeding area must be provided to allow group feeding and availability to all members of the herd, in the absence of natural barriers for providing protection from the wind, an artificial wind break must be provided around the feeding bunks, the feeding area must be rotated around the out-wintering paddock to prevent damage to the pasture and ensure a safe and hygienic turf for cattle standing around the bunk and the paddock will be left unpopulated the season after being used for out-wintering to allow the pasture to recover or be reseeded if it was damaged.

Cattle may only be removed from pasture and housed in an emergency situation or extreme weather conditions when their welfare would otherwise be affected. Cattle may be housed in an emergency with no pasture access for a maximum of 28 days. If local climatic conditions mean that cattle are likely to be housed with no access to pasture for more than 28 days, the farmer must have a plan for their management that applies from day one of housing. It includes: triggers for housing such as temperature, precipitation or soil condition, space available to each housed animal, facilities available to house the animals. These must include laying areas, loafing areas, feeding areas and space to enable animals to fulfill their behavioral needs and triggers for cattle to be returned to pasture. If temporarily kept indoors, cattle and calves must not be subjected to dim and/or continuous lighting or kept in permanent darkness. In the daytime, the animals must always be able to see each other, their food and water sources, as well as their surroundings clearly.

Protection from Predators

Proposed Language:

Cattle and calves must be protected from predators. The roof and sides of housing and shelter must provide a barrier to predators. In the event that exclusion is unsuccessful and predation

remains an issue, live trapping may be used. Live traps must be checked twice daily. All other forms of traps are prohibited. All snares and leghold traps are prohibited. The use of poisons against predators is prohibited. If live trapping is not possible or is not successful, lethal control of specific animals may be carried out. All lethal control/euthanasia of predators must result in instantaneous irreversible unconsciousness and death.

Management

Proposed Language:

Action must be taken to treat lameness and to remove any causes of lameness. All classes of cattle must be kept in stable groups; mixing animals from different groups should be avoided. All groups of animals must be age, size, and behaviorally sorted to ensure the welfare of less dominant animals. All cattle and calves must be maintained at body score 4 or above on a 1-9 scale or body score 2 or above on a 1-5 scale. Breeding cows and bulls must not exceed body score 7 on a 1-9 scale or body score 4 on a 1-5 scale. Heifers must not calve before the age of two years.

Outdoor calving on pasture is recommended where weather conditions permit. When indoor calving is necessary, a clean environment with proper bedding and sufficient space must be provided. Bedding must be provided if calving occurs anywhere else but on non-denuded pasture. A competent person must be available at calving time to assist if problems are anticipated at delivery.

When a bull is kept separately from cows he should either be kept with at least one other compatible animal or share a common fence with other cattle with which he can have at least nose-to-nose contact. When temporarily not on pasture, bulls must be kept in housing or shelter of sufficient size to accommodate their resting and exercise needs. Housing used for accommodating bulls must be bedded with sufficient bedding to provide a dry clean area for the bull to lie on and must open onto a well-fenced in pasture to which bulls have access. Lying areas in accommodation for bulls of average size should be at least 180 sq. feet (16.72 sq. meters) and for bulls weighing 2000 lbs (909.09 kg) or more, 225 sq. feet (20.90 sq. meters). For bulls who must be accommodated for a longer period or if cows are serviced in the bull accommodation, an exercise/service area should be provided that is at least twice the size of the lying area.

Genetic Selection

Proposed Language:

Cattle who have undergone genetic selection to the point that their welfare is negatively affected are prohibited. Cattle must be chosen with consideration of their ability to thrive in the prevailing climatic conditions of the farm, in pasture-based, free range, outdoor systems. The ability to successfully calve independently must be taken into account in modifications over time to herd genetics. Cloned or genetically engineered animals, breeding stock, semen and/or embryos are prohibited. Selection for double-musled animals that require routine caesarean sections is prohibited.

Weaning

Proposed Language:

It is highly recommended that calves remain in the herd with their mothers until weaning occurs naturally. In cases where natural weaning is not practical, weaning methods must be designed to

cause as little stress as possible to the calf and the cow. The average weaning age of calves in the herd must be eight months. Weaning calves less than six months of age is prohibited unless the health and welfare of the calf or the cow would be otherwise compromised. After separation, cows and calves must either be kept in adjacent pens where they can see, hear and sniff/lick each other or be completely out of sight and hearing of each other in order to reduce stress. Newly weaned calves should be kept in groups of familiar animals.

Painful Husbandry Procedures

Proposed Language:

Castration must be carried out by a competent person. If calves are castrated using rubber rings or bands, these must be applied only to calves that are one week old or less. Castration of calves after two months of age must be accompanied by sedation and appropriate anesthetic. Physical castration is the only acceptable method.

Tail docking is prohibited. Dehorning is prohibited. Horns may be tipped as long as the living tissue inside the horn is not being cut. Spaying of heifers is prohibited. Disbudding of calves after two months of age is prohibited. Calves, two months or younger, may be disbudded using hot iron cauterization by a person who is proficient in the process. Hot iron cauterization must be preceded by administration of a sedative (xylazine) and local anesthetic. Caustic paste may be used to disbud calves who are no older than seven days. The paste must be applied by a person who is proficient in the process. Choosing polled breeds, which avoids the need to disbud animals, is recommended.

The recommended method for permanent identification is Sub-Cutaneous Radio Frequency Identification. The recommended method of temporary identification is non-toxic paints or dyes. Ear tagging and tattooing are permitted methods of identification. Ear-marking by cutting/notching the ears with a knife or cutting of dewlaps is prohibited. Hot branding and freeze branding are prohibited.

Handling and Inspection

Proposed Language:

The use of hot prods or electric shocks is prohibited. All cattle must be moved in a calm and consistent manner. Stress from loud noises and rapid movements must be minimized. All chutes and other facilities for loading cattle must be designed to minimize stress to the animal and ensure that animals can breathe normally as they proceed through the loading process. All flooring used by the cattle must provide good traction, be well drained and kept clean and free of ice in the wintertime.

Inspection of cattle and calves must be possible at any time day or night.

Emergency Plans

Proposed Language:

A plan to care for or house animals in emergency situations must be prepared and be understood by all of those working with the cattle and calves. The plan must consider the welfare of the animals during a fire. In shelters or housing with restricted access (a single door or doorways), a fire plan must be established with escape routes to the outdoors, available from the interior of the shelter, to allow all animals to be evacuated quickly. In shelters or housing with restricted access, a method to extinguish the fire (fire extinguisher, water source) must be readily accessed.

Animals must be kept from direct access to electrical wiring and heat sources as a fire prevention measure

Humane Killing

Proposed Language:

Cattle and calves experiencing pain or suffering from which they are unlikely to recover must be immediately and humanely euthanized on the farm.

Euthanasia must be carried out in a manner that renders the animal immediately insensible to pain. Euthanizing cattle and calves in a way that poses unnecessary pain or suffering is prohibited. Prohibited methods include: electrocution, suffocation, exsanguinations without prior unconsciousness and blow to the head with a blunt instrument.

When local or national authorities order the killing of a herd of cattle or calves or if any large-scale euthanasia is about to take place to eradicate disease the event must be supervised by a veterinarian, government authority and/or cattle expert to ensure the proper euthanasia protocol and humane handling procedures are being followed.

General Comments

OIE's draft chapter on "Animal Welfare and Beef Cattle Production Systems" is incompatible with OIE's "Guiding principles for animal welfare" contained in Chapter 7.1 of the Terrestrial Animal Health Code. Furthermore, the draft chapter fails to satisfy the "Five Freedoms" on numerous counts. With few exceptions, the proposed guidelines are essentially synonymous with industrial beef production and entrench the status quo. Standards for cattle raised for meat which aim to promote animal welfare and well-being must ensure that the animals be allowed to behave naturally. OIE should promulgate standards that allow cattle the opportunity to perform natural and instinctive behaviors essential to their health and well-being and include provisions to ensure social interaction, comfort, and physical and psychological well-being. Considering the worldwide implications of OIE guidance and to achieve OIE's priority of animal welfare, the draft standards need to be significantly strengthened prior to adoption.

Thank you for the opportunity to comment on *OIE* Terrestrial Animal Health Code draft chapters "Animal Welfare and Broiler Chicken Production" and "Animal Welfare and Beef Cattle Production Systems". With our recommendations, AWI seeks to help strengthen the draft chapters. We look forward to seeing our concerns addressed prior to adoption of the chapters.

Respectfully submitted,

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