



Animal Welfare Institute

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February 23, 2011

Ohio Livestock Care Standards Board
Ohio Department of Agriculture
8995 E. Main Street
Reynoldsburg, OH 43068

RE: Sheep On-Farm Standards

Dear Members of the Board:

I am writing on behalf of the Animal Welfare Institute (AWI) to offer recommendations regarding the setting of standards for on-farm treatment of sheep. We understand that the Ohio Livestock Care Standards Board is currently addressing this issue.

Since its founding in 1951, AWI has been alleviating suffering inflicted on animals by people. Major goals of the organization include supporting high-welfare family farms and achieving humane slaughter and transport for all animals raised for food. In 2006 AWI launched a high-welfare food labeling program called Animal Welfare Approved (AWA). As part of this program AWA collaborates with scientists and farmers to set animal care standards. The program employs a highly trained field staff to audit farms for compliance with these standards, and communicates regularly with hundreds of family farmers in dozens of states, including Ohio. The program covers the full lives of the animals from birth through slaughter.

Background

Generally speaking, the welfare of sheep is good, as a large percentage of sheep are farmed extensively and are allowed to engage in natural behaviors. However, a few key practices that apply to both extensive and intensive rearing of sheep cause significant welfare problems that can be ameliorated. The Ohio Livestock Care Standards board has an opportunity and responsibility to eliminate unnecessary and inhumane practices that ultimately hurt both the perception of the industry as well as the well-being of the animals that the sheep industry relies on.

An important factor for industry experts and the Board to consider is that making standards that reflect improvements for animal welfare takes into account the desires of the current and future sheep industry consumers. In a 2004 survey conducted by researchers at the Ohio State University, 92% of Ohioans agreed that it is important that farm animals are well-cared for, and 81% said the well-being of farm animals is just as important as the well-being of pets.¹ Those in the sheep industry must not neglect the statistics that convey its customers' concerns. The Ohio Livestock Care Standards Board has

¹ Rauch A & Sharp JS, *Ohioans Attitudes about Animal Welfare*, The Ohio State University, Social Responsibility Initiative, January 2005. http://ohiosurvey.osu.edu/pdf/2004_Animal_report.pdf.

an important opportunity to self-regulate welfare concerns. AWI has identified the following key areas with recommended standards regarding particularly inhumane practices.

Recommended Standards

Tail Docking/Short Tail Docking/Extreme (Ultra-short) Tail Docking

The AVMA recognizes that pain is involved in tail docking of lambs and is therefore a welfare concern.² Tail docking is not necessary to maintain the health and welfare of lambs. Furthermore, Northern-European short-tail breeds, as well as Fat-tailed sheep, do not require docking. Hence, AWI recommends planning long-term selective breeding strategies that incorporate choosing genes associated with short tails so the docking practice can be eliminated.

Furthermore, when tail docking is done, standards should set a strict minimum tail length to preclude short and extreme tail docking. The American Veterinary Medical Association, American Association of Small Ruminant Practitioners, and American Sheep Industry Association recommend that tails be removed no shorter than the distal end of the caudal tail fold. Tails docked shorter than this may result in an increased incidence of rectal prolapse due to damage caused to the muscles and nerves used by the lamb's anus. The tail is also needed to protect the lamb's vulva and udder from weather extremes. Additionally, in 2003 Ohio State University, along with four other universities, studied the effect of short docking on the health of sheep; they found an increased risk of rectal prolapse and concluded that the practice "compromises the health and well-being of sheep. The practice should be abandoned."³

Generally, tail docking should not be carried out unless there is an unavoidable and high risk of suffering due to fly strike.

- Short and extreme tail docking is **prohibited**. The minimum length at which the tail may be docked is at the end of the caudal tail fold.
- Tail docking should be done by rubber ring (or band) method from 24 hours after birth until the lamb is 7 days old.
- Hot docking iron should be used if the lamb is older than 1 week, up to 8 weeks of age.
- Local anesthetic should be applied to reduce pain. Local anesthetic is **required** if the tail docking procedure is delayed beyond 8 weeks of age.
- Tail docking for show purposes is **prohibited**.

² AVMA, Policy. Welfare Implications of Tail Docking of Lambs. Feb. 18, 2010.

³ Thomas, et al. (2003) Length of docked tail and the incidence of rectal prolapse in lambs. J. Anim. Sci. 81: 2725-2732. http://ag.arizona.edu/pima/4-h/projects/sheep/tail_docking_rectal_prolapses.pdf

Castration

- Castration should be performed from 24 hours after birth up to 7 days old. Prior to 48 hours is an ideal time to castrate as pain receptors are not fully responsive.
- Rubber rings are acceptable when castration is performed by trained on-farm personnel, because it is a simpler method than surgery with less potential for complications and infection.
- If castration is performed after 3 months of age, the procedure **must** be performed by a veterinarian.
- Local anesthetic and analgesia **must** be used to reduce pain if surgical castration is performed.

Conclusion

AWI appreciates the opportunity to offer recommendations on farm animal care standards for Ohio, and looks forward to seeing our views incorporated in the proposed regulations for on-farm treatment of sheep and lambs. It should be noted that AWI does not view compliance with the above recommendations as constituting humane treatment of farm animals, but merely as providing improved animal care. Please do not hesitate to contact me by phone at 202-446-2148 or email at elissa@awionline.org if you have any questions or require additional information.

Sincerely,



Elissa Sosland, M.S.
Farm Animal Program Associate