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December 30, 2010

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### OIE's Terrestrial Animal Health Code – September 2010 – Guidance on Development of Animal Welfare Standards and Poultry Chapters

Dear Dr. David:

As requested, when we have comments on revised text, our responses are formulated for each document as follows:

- a. identification of the text on which we are commenting;
- b. description of the changes we believe should be made, to include suggested language, if any, to implement the changes we believe should be made; and
- c. scientific justification or rationale for such changes.

When language revisions are suggested, recommended deletions are ~~struck through~~, and recommended additions are underlined. Language revisions suggested by the AVMA are also **highlighted** to differentiate from revisions included in the original documents.

#### SECTION 1—GUIDANCE FROM THE ANIMAL WELFARE WORKING GROUP TO AD HOC GROUPS ON THE DEVELOPMENT OF ANIMAL WELFARE STANDARDS

##### **Paragraph 4, Sentences 3 and 4**

- a. TEXT: These can include both qualitative and quantitative elements, as in: (1) If more than 2% of birds arrive at slaughter plants with broken wings, catching crews should be re-trained to catch birds in ways that are less likely to cause injuries. (2) In months where hot weather is expected, stocking density should be reduced so that birds have enough space to perform wing-stretching unimpeded.
- b. CHANGES & REVISIONS SUGGESTED: These can include both qualitative and quantitative elements, respectively, as in: (1) If more than 2% of birds arrive at slaughter plants with broken wings, catching crews should be re-trained to catch birds in ways that are less likely to cause injuries. (2) (1) In months where hot weather is expected, stocking density should be reduced so that birds have enough space to perform wing-stretching unimpeded, and (2) if more than 2% of birds arrive at slaughter plants with broken wings, catching crews should be re-trained to catch birds in ways that are less likely to cause injuries.

- c. RATIONALE: The order of numerical items should be reversed so there is internal consistency in the statement (i.e., although the beginning of the statement refers first to qualitative then quantitative information, the existing order of [1] and [2] reflects quantitative then qualitative information). The revised language also includes editorial suggestions.

**SECTION 2—DRAFT CHAPTER: ANIMAL WELFARE AND BROILER CHICKEN PRODUCTION  
(COMMENT ONLY ON REVISIONS)**

**Article X.X.2.2**

- a. TEXT: Semi intensive systems
- b. CHANGES & REVISIONS SUGGESTED: Semi-intensive systems
- c. RATIONALE: Editorial suggestion.

**Article X.X.4 Criteria or measurables for the welfare of broilers, Paragraph 2**

- a. TEXT: It would be impractical at this time to assign numeric values to measurables (e.g. to specify a certain mortality rate as ‘acceptable’ or ‘optimum’, due to the large variations in the commercial production systems used by OIE Members.
- b. CHANGES & REVISIONS SUGGESTED: It would be impractical at this time to assign numeric values to measurables (e.g. to specify a certain mortality rate as ‘acceptable’ or ‘optimum’), due to the large variations in the commercial production systems used by OIE Members.
- c. RATIONALE: Insert missing closed parenthesis.

**Article X.X.4.1. Criteria or measurables for the welfare of broilers, Mortality (dead, culled) and morbidity**

- a. TEXT: Any abrupt increase in the daily mortality or morbidity rate not connected to a specific *disease* could reflect an animal welfare problem.
- b. CHANGES & REVISIONS SUGGESTED: Any abrupt increase in the daily mortality or morbidity rate not connected to a specific *disease* could reflect a **different** animal welfare problem.
- c. RATIONALE: Connections between animal health and welfare have been stated as one reason for the OIE’s assuming responsibility for setting international animal welfare standards. In contrast, the text provided implies that disease problems are distinct from welfare problems. By the OIE’s definition of ‘animal welfare,’ poor health, including the presence of disease, is a welfare problem. Therefore, if disease is ruled out, then we are looking at a different animal welfare problem.

**Article X.X.4.3. Criteria or measurables for the welfare of broilers, Contact dermatitis, Sentence 1**

- a. TEXT: Contact dermatitis affects skin surfaces which have prolonged contact with litter or other flooring surfaces, the food pad, rear surface of the hock and, when severe, the breast area.
- b. CHANGES & REVISIONS SUGGESTED: Contact dermatitis affects skin surfaces **which that** have prolonged contact with litter or other flooring surfaces, **including** the food pad, rear surface of the hock and, when severe, the breast area.
- c. RATIONALE: Editorial suggestions.

**Article X.X.4.3. Criteria or measurables for the welfare of broilers, Contact dermatitis, Sentence 3**

- a. TEXT: If severe the foot and hock lesions may contribute to lameness or serve as a portal of entry for secondary *infections*.
- b. CHANGES & REVISIONS SUGGESTED: If severe the foot and hock lesions may contribute to lameness or serve as a portal of entry for secondary **infections pathogens**.

- c. RATIONALE: 'Infection,' as defined by the OIE, "means the entry and development or multiplication of an infectious agent in the body of humans or animals." Infections, however, do not enter lesions; infections are the result of pathogens that enter lesions. An alternative to 'pathogens' may be 'infectious agents.'

**Article X.X.4.7. Criteria or measurables for the welfare of broilers, Abnormal behaviour – feather pecking and cannibalism**

- a. TEXT: Feather pecking is the pecking or pulling of the feathers of other broilers, and can result in significant feather loss.
- b. COMMENT: Feather pecking can include self-pecking (self-mutilation) or pecking of others (allopecking) with different causes. Should a distinction between these two problems be acknowledged?

**Article X.X.5.2.13 Recommendations, Environment and management, Handling and inspection, Paragraph 2, sentence 1.**

- a. TEXT: Inspection should be done in such a way that ~~birds~~ broilers are not unnecessarily disturbed, for example ~~personnel~~ animal handlers should move quietly and slowly through the flock.
- b. CHANGES & REVISIONS SUGGESTED: Inspection should be done in such a way that ~~birds~~ broilers are not unnecessarily disturbed, for example ~~personnel~~ animal handlers should move quietly and slowly through the flock.
- c. RATIONALE: We assume the intent was to replace 'personnel' with 'animal handlers,' but in the version provided for comment, both terms are struckthrough.

We thank you for your consideration of our comments.

Yours sincerely,



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Assistant Executive Vice President