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VIA E-MAIL ONLY

Dear Dr. Egrie:

The AVMA appreciates the opportunity to provide comments on the following five (5) animal welfare-related documents extracted from the report of the September 2011 meeting of the OIE Terrestrial Animal Health Standards Commission (TAHSC). As requested, when we have comments on revised or proposed text, our responses are formulated for this Chapter as follows:

- a. identification of the text, as written in the TASHC report, on which we are commenting;
- b. description of the changes we believe should be made to the text, to include suggested language, if any, to implement those changes; and
- c. scientific justification or rationale for such changes; or comments if no specific changes are suggested.

When language revisions are suggested under “b.,” we assumed that any changes proposed by the TASHC will be accepted. Thus, our recommended deletions are indicated as ~~struck through~~ text and additions as underlined text.

SECTION 1—CURRENT CHAPTERS WITH CHANGES RECOMMENDED BY THE CODE COMMISSION (COMMENTS ALLOWED ONLY ON OIE CHANGES INDICATED)

1. Use of Animals in Research and Education

- a. TEXT: Preamble, Paragraph 5—The OIE recognizes that the use of live *animals* in research and education is a legitimate activity and, as a consequence, domestic and international transport of *animals* is essential to maintaining progress in advancing human and animal health.
- b. CHANGES & REVISIONS SUGGESTED: The OIE recognizes that the use of live *animals* in research and education is a legitimate activity and, as a consequence, domestic and international transport of *animals* is essential to maintaining progress in advancing human and animal health and animal welfare.
- c. RATIONALE: Because the focus of the chapter is welfare, it would seem appropriate that good welfare be indicated as a desired outcome (i.e., research involving animals often directly or indirectly provides information that can result in improvements in animal welfare [including but not limited to animal health]).
 - a. TEXT: Article 7.8.1, Definitions—Laboratory animal means an *animal* that is intended for use in research. In most cases, such *animals* are purpose-bred to have a defined physiological, metabolic, genetic or pathogen-free status.
 - b. CHANGES & REVISIONS SUGGESTED: None

- c. COMMENTS: The AVMA respectfully seeks clarification regarding this definition proposed by the TAHSC. Is the expectation that this definition addresses animals used in both controlled settings and field research? The preamble of this chapter defines ‘research’ as basic and applied research, and the latter may be conducted under field conditions as well as in controlled settings. Article 7.8.2., which describes the scope of this chapter, does not appear to effectively address this ambiguity. Clarification may be helpful for some users.
- a. TEXT: *Article 7.8.7, Source of animals. First sentence, paragraph 8. Transport, importation and exportation—Animals should be transported under conditions that are appropriate to their physiological and behavioral needs and microbiological pathogen free status, with care to ensure appropriate physical containment of the *animals* as well as exclusion of contaminants.*
- b. CHANGES & REVISIONS SUGGESTED: *Animals should be transported under conditions that are appropriate to their physiological and behavioral needs and microbiological pathogen-free status, with care to ensure appropriate physical containment of the *animals* as well as exclusion of contaminants.*
- c. RATIONALE: The AVMA does not support the proposed change because, potentially, animals may not be pathogen-free, but rather pathogen-rich. While transport of pathogen-rich animals may be less likely in the United States than in less developed countries, the AVMA believes that the potential for disease or parasite transmission needs to be considered to ensure appropriate physical containment. Although this is discussed in subsequent paragraphs within this article, the point addressed by paragraph 8 is sufficiently broad that we do not believe it can be ignored.
- a. TEXT: *Article 7.8.10, Transportation, introductory paragraph, second sentence—Therefore, every precaution should be taken to avoid unnecessary stress through inadequate ventilation, exposure to extreme temperatures, lack of feed and water, long delays, etc. In addition, *animals* should be transported under conditions and in *containers* that are appropriate to their physiological and behavioural needs and pathogen free status, with care to ensure appropriate physical containment and safety of the *animals*.*
- b. CHANGES & REVISIONS SUGGESTED: *Therefore, every precaution should be taken to avoid unnecessary stress ~~through~~ caused by inadequate ventilation, exposure to extreme temperatures, lack of feed and water, long delays, etc. In addition, *animals* should be transported under conditions and in *containers* that are appropriate to their physiological and behavioural needs and ~~pathogen-free~~ microbiological status, with care to ensure appropriate physical containment and safety of the *animals*. In the event of a delay, a contingency plan should be in place and the name of an available emergency contact person should be prominently displayed on the transportation container.*
- c. RATIONALE: See previous comments regarding ‘pathogen-free status.’ Irrespective of best practices, delays may occur and a contingency plan should be required to address delays. Remaining suggestion is an editorial clarification.

2. Introduction to the Recommendations for Animal Welfare

- a. TEXT: *Article 7.1.4., General principles for the welfare of animals in livestock production systems, number 1—Genetic selection should promote the health and *welfare* of *animals*. Breeds of *animals* should be introduced only into environments to which they are genetically suited.*
- b. CHANGES & REVISIONS SUGGESTED: *Genetic selection should promote the ~~health and~~ *welfare* of *animals*. ~~Breeds of *animals*~~ *Animals* should be introduced only into environments to which they are genetically suited.*
- c. RATIONALE: Health is part of what contributes to the welfare of animals, as per the definition of *animal welfare* adopted by the OIE. Therefore, it is not necessary to identify health separately. In addition, not only do breeds result from genetic manipulation, so do types and strains. Deletion of ‘breeds of’ generalizes the statement to include other types of genetic classifications.
COMMENT: As far as the AVMA was able to determine, ‘environment’ is not defined within the OIE *Codes*. It may be of value to clarify that ‘environment’ encompasses both natural environments and man-made facilities.
- a. TEXT: *Article 7.1.4., General principles for the welfare of animals in livestock production systems, number 2—The physical environment, including the substrate (walking surface, resting surface, etc) should be suited to the species so as not to cause injury or transmit *diseases* or *parasites* to *animals*.*
- b. CHANGES & REVISIONS SUGGESTED: *The physical environment, including the substrate (walking surface,*

resting surface, etc) should be suited to the species so as ~~not to cause~~ minimize injury or and the risk of transmission transmit of diseases or parasites to *animals*. In addition, the physical environment should protect animals from predators.

- c. RATIONALE: Environments often have trade-offs in terms of benefits and deficits for welfare. For example, pastures are ideal environments for grazing animals, but they also increase risks of parasitism so must be managed to reduce those risks. Furthermore, the statement as recommended by the TAHSC may be taken to imply that associated risks should be reduced to zero (ie, "...so as not to cause..."), which is not practicable. Protection from predators is also an important environmental consideration in maintaining good welfare. Other revisions are editorial for technical accuracy.
- a. TEXT: *Article 7.1.4., General principles for the welfare of animals in livestock production systems, number 3*—The physical environment should allow comfortable resting, safe and comfortable movement, including normal postural changes, and the opportunity to perform types of natural behavior that animals are motivated to perform.
- b. CHANGES & REVISIONS SUGGESTED: The physical environment should allow comfortable resting~~;~~ safe and comfortable movement, including normal postural changes~~;~~ and the opportunity to perform types of natural behaviour that animals are motivated to perform and that contribute to their well-being.
- c. RATIONALE: Although it is important to provide opportunities for expression of natural behaviours, consideration must be given to whether those behaviours contribute to an animal's well-being within a given environment.
- a. TEXT: *Article 7.1.4., General principles for the welfare of animals in livestock production systems, number 8*—Where painful procedures cannot be avoided, the resulting pain should be managed as much as available methods and economic constraints allow.
- b. CHANGES & REVISIONS SUGGESTED: Where painful procedures cannot be avoided, the resulting pain should be managed as ~~much well~~ as available methods ~~and economic constraints~~ allow.
- c. RATIONALE: The AVMA recognizes that economics may impact what techniques are used to manage pain. However, there are other factors that also impact what techniques are used and, therefore, it seems inappropriate to single out economics in this bullet point.
- a. TEXT: *Article 7.1.4., General principles for the welfare of animals in livestock production systems, number 9*—The handling of animals should foster a positive human animal relationship and should not cause injury, panic, lasting fear or avoidable stress.
- b. CHANGES & REVISIONS SUGGESTED: The handling of *animals* should foster a positive human-animal relationship and should ~~not cause~~ strive to minimize injury, panic, lasting fear or avoidable stress.
- c. RATIONALE: The absolute as indicated in this statement (ie, "should not cause") may not be possible, given some practices currently necessary to manage animals in production systems. Hyphenation of 'human-animal' is an editorial suggestion that is consistent with current use of the term.

3. Animal Welfare and Beef Cattle Production Systems

- a. TEXT: *Article 7.x.4, Criteria or measurables for the welfare of beef cattle, number 1*—Behavior: Certain behaviours could indicate an animal welfare problem. These include anorexia, increased respiratory rate or panting (assessed by panting score), and the demonstration of stereotypic behaviors.
- b. CHANGES & REVISIONS SUGGESTED: Certain behaviours could indicate an animal *welfare* problem. These include anorexia, increased respiratory rate or panting (assessed by panting score), vocalization and postural changes, and the demonstration of stereotypic behaviors.
- c. RATIONALE: Vocalization and postural changes are important behavioral indicators of welfare and should be included in the list of examples.
- a. TEXT: *Article 7.x.4, Criteria or measurables for the welfare of beef cattle, number 2*—Morbidity rates: Morbidity rates, such as disease, lameness, post-procedural complication and injury rates, above recognized thresholds can be direct or indirect indicators of the animal welfare status. Understanding the aetiology of the disease or syndrome is important for detecting potential animal welfare problems. Scoring systems, such as lameness scoring, can provide additional information.
- b. CHANGES & REVISIONS SUGGESTED: None.

- c. COMMENT: The term ‘recognized thresholds’ is somewhat subjective and, in addition, ‘normal’ and what is ‘acceptable’ may not always be equivalent. As such, this criterion may not be clear as written by the TAHSC. How will information be provided to users of the Code to ensure that the standard of ‘recognized thresholds’ is met? Scoring systems may likewise vary across OIE member countries and, again, expectations to meet this criterion may not be clear.
- a. TEXT: *Article 7.x.4, Criteria or measurables for the welfare of beef cattle, number 4—Changes in weight gain and body condition score: In growing animals, weight gain could be an indicator of animal health and animal welfare. Poor body condition score and significant weight loss could be an indicator of compromised welfare in mature cattle.*
- b. CHANGES & REVISIONS SUGGESTED: In growing animals, weight gain could be an indicator of animal health and animal welfare. Poor body condition score and significant weight loss could be ~~an~~ indicators of compromised welfare in young and mature cattle.
- a. RATIONALE: Poor body condition score and unintended weight loss are indicators compromised welfare in cattle of any age. The remaining suggestion is editorial
- a. TEXT: *Article 7.x.4, Criteria or measurables for the welfare of beef cattle, number 6—Physical appearance, final bullet point: Depression*
- b. CHANGES & REVISIONS SUGGESTED: Delete ‘depression’ from this list and add it to Article 7.x.4, Criteria or measurables for the welfare of beef cattle, bullet point 1—Behavior.
- c. RATIONALE: ‘Depression’ is a behavioral assessment, not a physical appearance. As such, it should be included in the examples of behaviors that can be used as criteria or measurables to assess the welfare of beef cattle.
- a. TEXT: *Article 7.x.4, Criteria or measurables for the welfare of beef cattle, number 8—Routine procedure management and rate of post-procedures complications, second and third sentences: ...However, if these procedures are not performed properly, animal welfare can be compromised where complications occur at levels above expected thresholds. Indicators of such problems could include:*
- b. CHANGES & REVISIONS SUGGESTED: ...However, if these procedures are not performed properly, animal welfare can be compromised where complications occur at levels above expected thresholds. ~~Indicators of such~~ Such problems could include: ...
- c. RATIONALE: Editorial suggestion. ADDITIONAL COMMENT: Similar references are made to ‘expected thresholds’ as in previous text. Again, users of the Code may need assistance/clarification from the OIE as to what information can be used to demonstrate acceptable ‘expected thresholds.’
- a. TEXT: *Article 7.x.5., Recommendations, number 1—Biosecurity and Animal Health, section a) Biosecurity and disease prevention, subsection ii): other animals*
- b. CHANGES & REVISIONS SUGGESTED: ii) other domestic and wild animals
- c. RATIONALE: Although the AVMA recognizes that “animal” is defined in the *Code* as meaning mammals, birds or bees, the revision suggested here may help emphasize that there are risks to biosecurity presented both by other domestic animals as well as by wild animals.
- a. TEXT: *Article 7.x.5, Recommendations, number 1—Biosecurity and Animal Health, section b) Animal health management, first sentence: Animal health management is a means a system designed to optimise the physical and behavioural health and welfare of the cattle herd. It includes the prevention, treatment and control of diseases and conditions affecting the herd, including the recording of illnesses, injuries, mortalities and medical treatments where appropriate. ~~prevent diseases occurring in cattle herds and also providing treatments for animals when disease occurs.~~*
- b. CHANGES & REVISIONS SUGGESTED: Animal health management means a system designed to optimise the physical and behavioural ~~health and~~ welfare of the cattle herd. It includes the prevention, treatment and control of diseases and conditions affecting the herd, including the recording of illnesses, injuries, mortalities and medical treatments where appropriate.
- c. RATIONALE: Health is a part of animal welfare, not separate from it. This is acknowledged in the OIE’s own definition and, therefore, references to both health and welfare in the same statement are redundant.

- a. TEXT: *Article 7.x.5, Recommendations, number 1—Biosecurity and Animal Health, section b) Animal health management, seventh paragraph, third sentence: ... Such Non-ambulatory animals should be moved—movement should be done very carefully using acceptable methods such as a sled, low-boy trailer or in the bucket of a loader....*
- b. CHANGES & REVISIONS SUGGESTED: ...Such movement ~~shoud~~ should be done carefully using acceptable methods such as a sled, low-boy trailer or in the bucket of a loader. ...
- c. RATIONALE: Correction of typographical error.
- a. TEXT: *Article 7.x.5, Recommendations, number 2—Environment, section c) Air quality, second paragraph, final sentence: ...The ammonia level in enclosed housing should not exceed 25 ppm.*
- b. CHANGES & REVISIONS SUGGESTED: ...The ammonia level in enclosed housing at animal level should not exceed 25 ppm. ...
- c. RATIONALE: Because gases stratify, it is important that concentrations be measured at animal level. In addition, although we do not have recommended language, it may add clarity to provide some parameters as to how ammonia concentrations should be measured (eg, frequency, descriptions of any averaging).
- a. TEXT: *Article 7.x.5, Recommendations, number 2—Environment, section e) Nutrition, third paragraph, final sentence: ...In times of severe drought, steps should be taken to avoid starvation of animals wherever possible—, including supplementary feeding, slaughter, sale or relocation of the animals, or humane killing.*
- b. CHANGES & REVISIONS SUGGESTED: ...In times of feed shortage, including but not limited to severe drought, steps should be taken to avoid starvation of animals wherever possible, including supplementary feeding, slaughter, sale or relocation of the animals, or humane killing.
- a. RATIONALE: Feed shortages may be caused by a variety of factors, including but not limited to severe drought. The recommendations should address any prolonged shortage of feed for any reason.
- a. TEXT: *Article 7.x.5, Recommendations, number 2—Environment, section e) Nutrition, penultimate paragraph, final sentence: ... All cattle need adequate supply and access to palatable water that ~~also~~ meets their physiological requirements and free from contaminants ~~potentially~~ hazardous to cattle health.*
- b. CHANGES & REVISIONS SUGGESTED: ...All cattle need adequate supply and access to palatable water that meets their physiological requirements and is free from contaminants hazardous to cattle health...
- c. RATIONALE: Editorial suggestion.
- a. TEXT: *Article 7.x.5, Recommendations, number 2—Environment, section f) Flooring, bedding, resting surfaces and outdoor areas, eighth paragraph: In straw or other bedding systems, the bedding should be maintained to provide ~~allow~~ animals a dry and comfortable place in which to lie.*
- b. CHANGES & REVISIONS SUGGESTED: In straw and other bedding systems, the bedding should be maintained to provide animals a dry and comfortable place in which to lie. Bedding must not only be dry on the surface, but pressure from the animals’ weight must not result in wetness.
- c. RATIONALE: A cursory inspection may suggest that bedding is suitably dry; however, a more careful inspection is required to ensure that moisture does not lie below the surface.
- a. TEXT: *Article 7.x.5, Recommendations, number 3—Management, section e) Painful husbandry procedures, subsection i) Castration, third paragraph: ... Methods of castration used in beef cattle include surgical (knife) removal of the testes, ischaemic methods (banding or ringing), and crushing and disruption of the spermatic cord (Burdizzo operation).*
- b. CHANGES & REVISIONS SUGGESTED: ...Methods of castration used in beef cattle include surgical (knife) removal of the testes, ischaemic methods (banding or ringing), and crushing and disruption of the spermatic cord (~~Burdizzo operation~~ emasculatome use). ...
- a. RATIONALE: Burdizzo is the name of a company that manufactures, among other things, a device generically known as an ‘emasculatome.’ There are other manufacturers and incorporation of ‘Burdizzo’ in the *Code* could be construed as an endorsement of this particular device. Such endorsement may not be appropriate, and the AVMA respectfully suggests using the generic term ‘emasculatome’ rather than ‘Burdizzo operation.’
- a. TEXT: *Article 7.x.5, Recommendations, number 3—Management, section e) Painful husbandry procedures, subsection i)*

Castration: Table

- b. CHANGES & REVISIONS SUGGESTED:
- i. Replace 'Burdizzo' with 'emasculator' throughout the table.
 - ii. In the column headed "Comments," do not selectively delete the statement indicating that a veterinarian should be consulted on how to control pain, because the AVMA believes a veterinarian should be consulted on how best to control pain for all procedures.
 - iii. In the explanation of the 'rubber ring method', the word 'grommet' should be replaced with 'metal clamp' under the column headed "Specific Method."
- c. RATIONALE: See previous comments regarding use of 'Burdizzo.' Note that elastrator rubber banding techniques have been associated with increased chronic pain; the AVMA accordingly believes these techniques should be discouraged. High tension-banding systems may be used with appropriate veterinary supervision and/or training in those situations where surgical castration may predispose animals to postsurgical complications.
- a. TEXT: *Article 7.x.5, Recommendations, number 3—Management, section e) Painful husbandry procedures, subsection ii) Dehorning: Table*
- b. CHANGES & REVISIONS SUGGESTED: For all procedures, a veterinarian should be consulted on how best to control pain, so this statement should not be selectively deleted for certain procedures in the column headed "Comment."
- c. RATIONALE: Pain management is a basic tenet of good animal welfare. Veterinary advice should always be sought on how to best prevent and control pain.
- a. TEXT: *Article 7.x.5, Recommendations, number 3—Management, section e) Painful husbandry procedures, subsection iii) Ovariectomy (Spaying), Table, third statement in column headed "Comments" for the specific method of ovarian removal by flank incision: Administration of local anaesthetic where applied may produce less complications than epidural block for per vagina method.*
- b. CHANGES & REVISIONS SUGGESTED: Flank ovariectomy performed without anesthesia is inhumane. Administration of local anesthetic where applied may produce less fewer complications than epidural block for per vagina method.
- c. RATIONALE: Flank ovariectomy is an inherently painful procedure and therefore anesthesia is required. Remaining revisions recommended are editorial.
- a. TEXT: *Article 7.x.5, Recommendations, Recommendations, number 3—Management, section b) Emergency plans, second paragraph, third sentence... In drought, animal management decisions should be made as early as possible and these should include a consideration of reducing cattle numbers.. ...*
- b. CHANGES & REVISIONS SUGGESTED: ...In times of feed and water shortages (including, but not limited to, drought), animal management decisions should be made as early as possible and these should include a consideration of reducing cattle numbers. ...
- c. RATIONALE: There may be multiple causes of feed and water shortages and resulting welfare issues must be addressed, irrespective of cause.

4. Slaughter of Animals

- a. TEXT: *Article 7.5.7, Stunning methods, number 5—Electrical stunning, section b) Electrical stunning of birds using a waterbath, Table titled: Minimum current for stunning poultry when using 50Hz*
- b. CHANGES & REVISIONS SUGGESTED: None
- c. COMMENT: The table provides currents ranging from 100-150 milliamperes per bird. However, these currents are substantially higher than those used in most of the world other than the European Union. Moreover, these currents (100-150 milliamperes per bird) are intended to kill, rather than simply stun, birds via cardiac arrest. The EU currently applies 105 milliamperes per bird; however these requirements are due to increase in 2012. This amount of current is not necessary for an effective stun, and concern has been expressed about welfare impacts because of wing/shoulder damage using this level of current. In addition, this level of current will result in substantial carcass damage and loss of acceptable product (impacts on the wings and pulley bone, as well as blood spatter and spots in breast meat). Most facilities outside of the EU are stunning birds, using 25 to 40 milliamperes of current per bird while maintaining acceptable bird welfare. If stunned birds are

appropriately exsanguinated, they will not regain sensibility before becoming unconsciousness due to blood loss. Applicable studies showing humane results achieved with lower currents have been conducted by Simmons Engineering in cooperation with researchers at multiple universities.

ADDITIONAL COMMENTS ON UNMODIFIED TEXT IN CHAPTER 7.5.:

- a. TEXT: *Article 7.5.6 and 7.5.9: Tables*
 - b. CHANGES & REVISIONS SUGGESTED: None
 - c. COMMENT: Rabbits appear to be missing as a species from “Summary analysis of handling and restraining methods and the associated animal welfare issues” and “Summary analysis of slaughter methods and the associated animal welfare issues,” although rabbits are mentioned in the text.
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- a. TEXT: *Article 7.5.7, Stunning methods, number 5—Electrical stunning, section b) Electrical stunning of birds using a waterbath, sixth paragraph:* Waterbaths for *poultry* should be adequate in size and depth for the type of bird being slaughtered, and their height should be adjustable to allow for the head of each bird to be immersed. The electrode immersed in the bath should extend the full length of the waterbath. Birds should be immersed in the bath up to the base of their wings.
 - b. CHANGES & REVISIONS SUGGESTED: Waterbaths for *poultry* should be adequate in size and depth for the type of bird being slaughtered, and their height should be adjustable to allow for the head of each bird to be immersed. ~~The electrode immersed in the bath should extend the full length of the waterbath.~~ Birds should be immersed in the bath so that their heads and necks are in the water up to the base of their wings.
 - c. RATIONALE: Requiring the electrode to extend the full length of the water bath appears to exclude some of the AC/DC combination units that have two separate stunning zones. Poultry veterinarians familiar with the practical application of these units indicate they appear to function well; therefore, it seems inappropriate to exclude the adoption of such technology. In addition, the stunner should be set so that only the head and neck of the birds are in the water. If the bases of the wings are in the water, shoulder and wing injury can occur. With proper control for bird uniformity, the head and most of the neck of large birds will be in the water, and smaller birds’ heads will still be in contact with the water so that they are effectively stunned.
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- a. TEXT: *Article 7.5.7, Stunning methods, number 5—Electrical stunning, section b) Electrical stunning of birds using a waterbath, ninth paragraph, first sentence:* The shackle-to-leg contact should be wetted preferably before the birds are inserted in the shackles....
 - b. CHANGES & REVISIONS SUGGESTED: The shackle-to-leg contact should be wetted by applying a fine spray of water to the feet/shackle/guide bar as birds enter the stunner ~~preferably before the birds are inserted in the shackles.~~
 - c. RATIONALE: Ensuring that the area of contact between shackle and leg is wet is good operating procedure; however, it is likely to be more effective, less stressful for the birds, and will conserve water if a fine spray is applied to the feet as birds enter the stunner rather than attempting to dampen the contact prior to the birds being shackled.
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- a. TEXT: *Article 7.5.7, Stunning methods, number 5—Electrical stunning, section b) Electrical stunning of birds using a waterbath, twelfth paragraph*
 - b. CHANGES & REVISIONS SUGGESTED: None
 - c. COMMENT: The following statement is made in paragraph 12: “When higher electrical frequencies are used, higher currents may be required.” However, an earlier table describing “Minimum current for stunning poultry when using high frequencies” has been deleted from this version of Chapter 7.5.. If the recommendations in the table have been determined to be inappropriate, then this reference in the text should either be removed or further explanation provided regarding the application of higher frequencies.
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- a. TEXT: *Article 7.5.7, Stunning methods, number 5—Gas stunning (under study), section c) Gas stunning of poultry, subsection ii) Requirements for effective use, second bullet point:* Gas mixtures should be humidified.
 - b. CHANGES & REVISIONS SUGGESTED: ~~Gas mixtures should be humidified.~~
 - a. RATIONALE: The AVMA is unaware of published data suggesting gas mixtures used to stun poultry should be humidified.

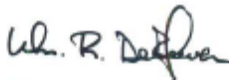
SECTION 2—NEW CHAPTERS (COMMENTS ALLOWED ON ALL TEXT)

5. Model Veterinary Certificate for International Trade in Laboratory Animals

- a. TEXT: *Article 5.13.2, Notes for guidance on the use of the veterinary certificate, number 3—Part II, Classification of pathogen-free status.*
 - b. CHANGES & REVISIONS SUGGESTED: None
 - c. COMMENT: This portion of the certificate presumes that animals known to be infected (or infested) with pathogens will not be transported. Although this may be the case in the United States, the AVMA is not clear whether is true internationally. If it is not true (ie, if infected/infested animals are transported), then the *Code* should provide guidance by adding additional information to the certificate about affected animals. The AVMA was not clear as to whether such information is already included in the section of the model certificate on zoosanitary information (number 4, Part III). If it is, then it may not need to be addressed in this section of the certificate.
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- a. GENERAL COMMENT REGARDING THIS CHAPTER: Contingencies must be addressed; however, it does not seem that there is a place to add emergency contact information to the certificate. The AVMA believes it may be appropriate to require the name/contact information of an emergency contact person to be prominently displayed on the certificate and transport container. Please also refer to our comments on document 1 (Chapter 7.8.); specifically, our final comment regarding Article 7.8.10.

As always, we appreciate the opportunity to provide input. Should you have questions or require additional information about our comments, please do not hesitate to contact Dr. Beth Sabin, International Coordinator and Assistant Director in our Education and Research Division (esabin@avma.org; 800-248-2862, ext 6675) or Dr. Gail Golab, Director, Animal Welfare Division (ggolab@avma.org; ext 6618).

Sincerely,



W. Ron DeHaven, DVM, MBA
Executive Vice President and CEO