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January 24, 2006

Michael David, MS, VMD, MPH  
 Debra Beasley, VMD  
 USDA-APHIS-VS  
 Sanitary International Standards Team  
 Riverdale, MD

Dear Drs. David and Beasley:

The AVMA appreciates the opportunity to provide comments on the September 2005 amendments to the May 2005-adopted OIE Guidelines on Animal Welfare, including the **General Definitions, Guidelines for the Transport of Animals by Land, Guidelines for the Transport of Animals by Sea, Guidelines for the Slaughter of Animals for Human Consumption, and Guidelines for the Killing of Animals for Disease Control Purposes**. As requested, our comments are formulated for each section as a general statement, followed by suggested revised language where appropriate. Suggested deletions are ~~struck through~~, suggested additions are underlined.

#### Chapter 1.1.1, General Definitions

Animal handler—The directive in the last sentence “Their competence should be demonstrated through independent assessment and accreditation” seems prohibitively difficult for member countries to implement and enforce (with respect to the United States, the number of individuals that would need to be certified is daunting). In addition, this is redundant with the guideline in Article 3.7.3.2, Competence 2 of “Guidelines for the Transport of Animals by Land” and Article 3.7.2.2, Competence 1 of “Guidelines for the Transport of Animals by Sea,” and could present oversight problems should one part of the document be changed and the other inadvertently overlooked. We recommend deletion of this sentence and editorial modification so that the definition reads: “A person with a knowledge of the behavior and needs of animals ~~which~~ who, with appropriate experience and a professional and positive response to an animal’s needs, contributes to results in effective management and good welfare.”

Journey—We do not understand the rationale behind the 48 hour criterion. There appears to be no corresponding restriction on journey length or duration requirement for rest periods specified in the Guidelines for the Transport of Animals by Land or Guidelines for the Transport of Animals by Sea. Is this criterion proposed in anticipation of future additional guidance and, if so, what is its basis? If no rationale can be provided, we recommend the following modification to the definition: “An animal transport journey commences when the first animal is loaded onto a *vehicle/vessel* or into a *container* and ends when the last animal is unloaded. ~~and includes any stationary resting/holding periods of less than 48 hours. The same animals do not commence a new journey until after a period of over 48 hours for rest and recuperation, with adequate feed and water.~~” If additional criteria regarding journeys are deemed to be necessary, we believe these are more appropriately placed in the actual guidelines for transport.

Lairage—We wonder whether specifying water, feed, and rest in the definition implies that all of these things must be provided in lairage? Provision of feed may not be appropriate in certain situations, such as lairage prior to slaughter. We therefore recommend the following modification to this definition: “Pens, yards and other holding areas used for accommodating animals in order to give them necessary attention ~~(including water, feed, rest)~~ before they are moved on or used for specific purposes including slaughter.”

Stunning—We were unsure of when stunning would be performed with the expectation that an animal would recover. Animals destined for slaughter are typically stunned using physical means (i.e., mechanical or electrical methods) or controlled atmospheric stunning (chemical). Other chemical approaches to loss of consciousness that are employed with the expectation of recovery are more appropriately referred to as anesthesia. We therefore recommend the following modification to this definition: “Any mechanical, electrical, chemical or other procedure ~~that which~~ causes immediate loss of consciousness; when used before slaughter, the loss of consciousness lasts until death from the slaughter process; ~~in the absence of slaughter, the procedure would allow the animal to recover consciousness.~~”

Transporter—This term only appears once within the sets of guidelines (Article 3.7.3.7, Travel 7). We noted that although “transport company” also appears in the document, it is not defined.

#### Guidelines for the Transport of Animals by Land

Article 3.7.3.1, Responsibilities 4d—We are concerned about inconsistencies in assignment of responsibility for fitness to travel. This Article states that fitness to travel should be determined by drivers, and if in doubt, the animal should be examined by a veterinarian. In other words, primary responsibility for determining fitness is assigned to the driver. In Article 3.7.3.2, Competence 3e, responsibility is assigned to the handler and, in Article 3.7.3.5, Pre-journey 5a, responsibility is jointly assigned to the handler and the veterinarian. In Article 3.7.3.4, Documentation 3a, “fitness to travel” is identified as part of the veterinary certification. The intent appears to be that a requirement for veterinary examination to determine fitness is the exception rather than a mandate; therefore, we believe this should be consistently stated throughout the document. Our suggested adjustments to the language of related provisions are the following: Article 3.7.3.4, Documentation 3a, delete provision; Article 3.7.3.5, Pre-journey 5a, revise to read “Each animal should be inspected by ~~a veterinarian or~~ an *animal handler* to assess fitness...”

Article 3.7.3.1, Responsibilities 8—Editorial revision. “The receiving *Competent Authority* should report back to the sending *Competent Authority* on significant animal welfare problems ~~that which~~ occurred during the journey.”

Article 3.7.3.3, Planning the journey 2b—Editorial revision. (delete period, insert comma and lower case p). “...are likely to be less fearful of being loaded and transported, - Ppeople handling animals...”

Article 3.7.3.3, Planning the journey 6f—Editorial revision. “...should be varied to, where possible, accommodate already established groups of animals while avoiding group sizes ~~that which~~ are too large...”

Article 3.7.3.3, Planning the journey 9d—We are concerned about the requirement to obtain permission from the importing country prior to administration of medication used

for therapeutic purposes. This requirement may unnecessarily delay treatment of ill animals to the detriment of animal health and welfare. We ask that the proposed amendment be deleted from the document, so that the guideline reads: “Medications used prophylactically or therapeutically should only be administered by a veterinarian or other person who has been instructed in their use by a veterinarian. ~~and agreed by the Veterinary Authority of the importing country.~~”

Article 3.7.3.5, Pre-journey period 1c—We agree that previous transport experience, training and conditioning can affect animals’ responses to transport. Such effects, however, can be positive or negative depending on the nature of that experience. For this reason, we recommend the following modification to the stated guideline: “Consideration should be given to an animal’s previous transport experience, training and conditioning, if known, as these may affect ~~reduce~~ fear and stress in animals.”

Article 3.7.3.5, Pre-journey period 1e—Editorial revision. “When animals are to be provided with a novel diet or method of feed or water administration, ~~provision during or after transport~~, an adequate period of adaptation should be planned.

Article 3.7.3.5, Pre-journey period 5cvi—Editorial revision. “Pregnant animals that ~~which~~ would be in the final 10% of their gestation period...”

Article 3.7.3.5, Pre-journey period 5cvii—Editorial revision. “Females ~~traveling without young which that~~ that have given birth within the previous 48 hours and are traveling without young”

#### Guidelines for the Transport of Animals by Sea

Article 3.7.2.3, Planning the journey 2a—Editorial revision. “When animals are to be provided with a novel diet or unfamiliar methods of supplying ~~of~~ feed or water, ...”

Article 3.7.2.3, Planning the journey 3a—Editorial revision. “When possible and agreed to by the *Veterinary Authority of the importing country*,...”

Article 3.7.2.4, Documentation 3b—See previous comments regarding Article 3.7.3.1, Responsibilities 4d under “Guidelines for the Transport of Animals by Land.” Suggested revision is deletion of statement 3b.

Article 3.7.2.5, Pre-journey period 1biii—Editorial revision. “When animals are to be provided with a novel diet or unfamiliar methods of supplying ~~of~~ feed or water, they should be preconditioned.”

Article 3.7.2.5, Pre-journey period 3a—See previous comments regarding Article 3.7.3.1, Responsibilities 4d under “Guidelines for the Transport of Animals by Land.” Suggested revision is: “Animals should be inspected by ~~a veterinarian or an animal handler~~ to assess fitness to travel.”

Article 3.7.2.6, Loading 2c—Editorial revision. “Artificial ~~lightening~~ lighting may be required.”

#### Guidelines for the Slaughter of Animals for Human Consumption

Article 3.7.5.1, General principles 1—Question. We note the absence of a reference to rabbits, which are commonly slaughtered for human consumption. Was this an oversight

or is there intent to address these outside the scope of references to “other animals” in future versions of the guidelines?

Article 3.7.5.1, General principles 2—We again question the practicality of implementing the requirement for demonstrating competence via “a current certificate from an independent body accredited by the *Competent Authority*.”

Article 3.7.5.2, Moving and handling animals 1m—Question. The guideline indicates that “lifting...by body parts such as their...limbs” should not be permitted. Does this imply that poultry may not be caught by their legs and lifted so as to be shackled prior to stunning? Or are poultry classified as “small animals,” in which case manual lifting would be permitted? We assume that it’s the latter, since Article 3.7.5.2, Moving and handling animals 3i specifically excludes poultry from restrictions on restraint.

Article 3.7.5.3, Lairage design and construction 2i—Editorial revision. “Unloading ramps should be designed and constructed so as to permit animals to be unloaded from vehicles on the same level or at the minimum...”

Article 3.7.5.4, Care of animals in lairages 11—Editorial revision. “Under normal circumstances, animals ~~that~~ ~~which~~ are expected to give birth during a journey...”

Article 3.7.5.7, Stunning methods 4—We express our support for OIE’s clear indication that the guidelines provided for gas stunning are still under study.

#### Guidelines for the Killing of Animals for Disease Control Purposes

Article 3.7.6.1, General principles 1—Again, this amendment to the guidelines calls for competence to be demonstrated by a certificate to be obtained from an independent body accredited by a *Competent Authority*. Establishing such certification processes is likely to be very time-consuming and we are not clear that USDA wishes to or has the required resources to become involved in such activities?

Article 3.7.6.12—Again, we express our support for OIE’s indication that guidelines pertaining to these methods are under study.

Article 3.7.6.12, CO<sub>2</sub>/air mixture 2ci—Editorial revision. “The need for a properly designed container or apparatus.”

Once again, we very much appreciate the opportunity to respond. Should you have questions or require additional information, please do not hesitate to contact me. I may be reached at the phone number as provided in the letterhead (ext. 6618), or you may contact me on my direct line at 847-285-6618 or via e-mail at [ggolab@avma.org](mailto:ggolab@avma.org).

Sincerely,

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