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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 amendments proposed during the October 2006 meeting of the Terrestrial Animal Health Standards Commission (TAHSC) to the **General Definitions, Guidelines for the Transport of Animals by Sea, and Guidelines for the Transport of Animals by Land** of the OIE Terrestrial Animal Health Code. As requested, our responses are formulated for each amendment as comment/rationale, followed by suggested revised language where appropriate. Recommended deletions are ~~struck through~~, recommended additions are underlined.

Chapter 1.1.1, General Definitions

Animal handler—The last sentence of the definition has been amended to state that “Competence should be gained through ‘formal’ training and/or practical experience.” We do not believe it is necessary to specify that training must be ‘formal’ (i.e., adequate training can be provided informally, such as on-the-job training), but we do believe that verification of training and experience is reasonable and appropriate. We suggest revision of this sentence as follows: “Competence should be gained through ~~formal~~ training and/or practical experience, and should be verified.”

Competent Authority and Veterinary Authority—The amendments add ‘and guidelines’ to the definitions. This will cause the two authorities to assume responsibility for ensuring or supervising implementation of ‘guidelines’ (which to date have been treated as Appendices to the Code chapters), in addition to previously assigned responsibilities of ensuring or supervising implementation of animal health ‘measures’ and ‘standards.’ This will blur the OIE distinction between standards and guidelines and appears to increase the authority given to the animal welfare appendices. We recommend clarification on the intent of this amendment be sought by the US representatives to the OIE and that, pending such clarification, the phrase ‘and guidelines’ be struck from the amended definitions. On a related note, a review of the documents on the OIE Website reveals variation in the use of “Appendix” and “Chapter” in reference to the animal welfare guidelines. See, for example, Web page www.oie.int/eng/normes/mcode/en_titre_3.7.htm, which references Chapters, and Web page www.oie.int/eng/normes/mcode/en_sommaire.htm, which references Appendices. This may be an editorial issue and, if so, it should be brought to the attention of the appropriate staff at the OIE.

Appendix 3.7.2, Guidelines for the Transport of Animals by Sea

Article 3.7.2.1.bis.1., Animal behaviour—Although the preamble specifically refers to cattle, buffalo, deer, camelids, sheep, goats, pigs, and equids, it indicates the guidelines “may also be applicable to other domesticated animals.” Domesticated animals would include poultry, but most descriptors within the guidelines appear to be more appropriate for other livestock. For example, paragraphs six and seven address invasion and management of the flight zone and point of balance and are not applicable to standard methods of catching poultry. Poultry could be accommodated by including the following statements at the end of paragraph six: “Poultry are handled and caught either by hand or machine, and invasion of the flight zone and some degree of crowding is necessary and unavoidable. Care should be taken to avoid overcrowding to the extent that injury results.”

Article 3.7.2.2.2.a.ii, Responsibilities, Specific considerations—Amended point 2 (a) (ii). Ensuring that medication is provided as appropriate for the species and the journey requires a plan to address common conditions that might be encountered during a journey if a veterinarian is not traveling with the vessel. We therefore suggest the following amendment to this point: “ensuring that equipment and medication are provided as appropriate for the species and the journey, including a plan for administration of medication for common conditions to be expected during a journey if a veterinarian is not traveling with the vessel.”

Article 3.7.2.2.2.c and d, Responsibilities, Specific considerations—Amended point 2 (c) states: “The responsibilities of the owners of the animals include the selection of animals that are fit for travel based on veterinary recommendations.” Amended point 2 (d) states: “The responsibilities of the business or buying/selling agent include: i) selection of animals that are fit to travel based on veterinary recommendations...” Articles 3.7.2.3.2.e, 3.7.2.6.1.c, and 3.7.2.6.3.a, however, require examination by a veterinarian only when an animal handler has doubt as to the animal’s fitness to travel. Inconsistency in the guidelines appears to create an ambiguity regarding the veterinarian’s degree of involvement in animal selection. We encourage the US representatives to seek appropriate amendment of the text by the OIE to ensure clarity and consistency.

Article 3.7.2.2.2.k, Responsibilities, Specific considerations—Suggested additional amendment to point 2 (k). As has been done in the Guidelines for the Transport for Animals by Land, a new responsibility of the Competent Authority of the importing country should be added to give animal consignments priority to allow them to unload and continue to their final destination without unnecessary delay. We suggest the addition of point 2 (k) (vii) as follows: “Giving animal consignments priority to allow import procedures to be completed without unnecessary delay.”

Article 3.7.2.8.2.b, Travel, Sick or injured animals—Point 2(b). The amendment requires all drugs to be used in accord with manufacturer’s instructions. This interferes with the professional judgment of a veterinarian for off- or extra-label use. Because availability of veterinary pharmaceuticals is limited, particularly for minor species, off- or extra-label use of drugs is necessary for appropriate treatment of animals. As an alternative to the proposed amendment, we recommend a slight modification of the original statement as follows: “All drugs and products should be used in accordance with the manufacturer’s instructions or veterinarian’s recommendations.”

Article 3.7.2.8.2.d, Travel, Sick or injured animals—Point 2 (d). The amended text requires that a veterinarian ensure that euthanasia, when necessary, is carried out

humanely. If a veterinarian is not present on the vessel, he or she cannot be expected to meet this requirement. We therefore suggest the following revisions to the amended text: “When euthanasia is necessary, ~~the veterinarian~~ animal handlers must ensure that it is carried out humanely. Recommendations for specific species are described in Appendix 3.7.6 on killing of animals for disease control purposes. Veterinary advice regarding the appropriateness of a particular method of euthanasia should be sought as necessary.”

Appendix 3.7.3, Guidelines for the Transport of Animals by Land

Article 3.7.3.1.bis, 1. Animal behaviour—Although the preamble specifically states these guidelines apply to poultry, just as in the Guidelines for the Transport of Animals by Sea, many descriptors appear to be more appropriate for other livestock. Once again, paragraphs six and seven address invasion and management of the flight zone and point of balance, and are not applicable to standard methods of catching poultry. Poultry could be accommodated by adding the following statements to paragraph six: “Poultry are handled and caught either by hand or machine, and invasion of the flight zone and some degree of crowding is necessary and unavoidable. Care should be taken to avoid overcrowding to the extent that injury results.”

Article 3.7.3.2.4.c, Responsibilities—Amended point 4 (c) assigns responsibility to transport companies, vehicle owners and drivers for “ensuring adequate competency of the driver in matters of animal welfare for the species being transported in case a separate animal handler is not assigned to the truck.” Assigning responsibility for driver competence to the driver him/herself seems inappropriate. This does seem like an appropriate responsibility for transport companies and vehicle owners.

Article 3.7.3.4.4.a, Planning the journey, Vehicle and container design and maintenance—Suggested additional amendment to point 4 (a). Grammatical suggestion; delete ‘the’ in second sentence. “Special attention should be paid to avoid ~~the~~ injury to animals...”

We recognize that comments were only requested on the TAHSC’s proposed amendments; however, during our review of the amended documents, we noted other related areas of concern.

Additional Comments on Appendix 3.7.2

Article 3.7.2.3.1, Competence—As indicated in our comments on the amended definition of *animal handler*, we believe competence may be gained through formal training, informal (e.g., on-the-job) training, or practical experience. Should our recommended revision to the definition be accepted, consistency requires that the same amendment be applied to this article as follows: “Competence may be gained through ~~formal~~ training and/or practical experience, and should be verified.”

Article 3.7.2.4.1.b.vii, Planning the journey, General considerations—Point 1 (b) (vii). As indicated for amended Article 3.7.2.2.2.a.ii, appropriate administration of medication requires a plan to address common conditions that might be encountered during a journey if a veterinarian is not traveling with the vessel. Should our recommended revision to Article 3.7.2.2.2.a.ii be accepted, Article 3.7.2.4.1.b.vii should also be modified as follows: “provision of appropriate equipment and medication for the numbers and species carried, including a plan for administration of medication for common conditions to be expected during a journey if a veterinarian is not traveling with the vessel.”

Article 3.7.2.4.7.b and d, Planning the journey, space allowance—Points 7 (b) and (d). We are aware the requirement that “Each animal should be able to assume its natural position

for transport (including during loading and unloading) without coming into contact with the roof or upper deck of the vessel” may be problematic for transport of poultry, particularly if the international expectation is that OIE guidelines will be met for domestic transport as suggested in the first paragraph of Article 3.7.2.2, “These guidelines may also be applied to the transport of animals by water within a country.” Most poultry in US broiler operations are transported for relatively short distances and times (although there are exceptions, especially for breeding stock and spent fowl) and tend to remain seated for almost the entire trip. Broiler coops in the United States typically allow birds to stand, but the requirement that the bird not come into contact with the roof will generally not be met.

Additional Comments on Appendix 3.7.3

Article 3.7.3.4.6.e, Planning the journey, Space allowance—Point 6 (e). As for Articles 3.7.2.4.7.b and d, the requirement that “Each animal should be able to assume its natural position for transport (including during loading and unloading) without coming into contact with the roof or upper deck of the vehicle” may be problematic for transport of poultry.

Once again, we very much appreciate the opportunity to provide input. 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.

Sincerely,

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Gail C. Golab, PhD, DVM
Associate Director, Animal Welfare