Dear Dr. Egrie:

The AVMA appreciates the opportunity to provide comments on the following animal welfare-related document extracted from the report of the February 2014 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 each 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.

Animal Welfare and Dairy Cattle Production Systems (Chapter 7.X)

a. TEXT: Article 7.X.3.1, Commercial dairy cattle production systems, Housed. “The type of the housing will depend on the environment, climatic conditions and management system.”
b. CHANGES & REVISIONS SUGGESTED: The type of housing will depend on the environment, climatic conditions and management system.
c. RATIONALE: Editorial suggestions.

a. TEXT: Article 7.X.4, Criteria (or measurables) for the welfare of dairy cattle. “Consideration should also be given to the design of the system and stockmanship.”
b. CHANGES & REVISIONS SUGGESTED: Consideration should also be given to the design of the system and stockmanship.
c. RATIONALE: Sentence is redundant with language in the preceding paragraph: “These criteria can be considered as a tool to monitor impact of design and management, given that both of these can affect animal welfare.”

a. TEXT: Article 7.X.4.2, Morbidity rates, “Mastitis, lameness, reproductive and metabolic diseases are also particularly important animal health problems for adult dairy cows. Scoring systems, such as body condition, lameness scoring and milk quality, can provide additional information.”
b. CHANGES & REVISIONS SUGGESTED: Mastitis, lameness, reproductive and metabolic diseases are also particularly important animal health problems for adult dairy cows. Scoring systems, such as body condition, lameness scoring and milk quality, can provide additional information.
c. **RATIONALE:** Editorial suggestions. Because these issues are already mentioned, the first sentence is explanatory, rather than new information as suggested by “also”.

a. **TEXT:** Article 7.X.4.8, Complications from common procedures, “..and treatment of certain conditions e.g. disbudding, hoof trimming, displaced abomasum.”

b. **CHANGES & REVISIONS SUGGESTED:** “..and treatment of certain conditions (e.g., disbudding, hoof trimming, displaced abomasum).

c. **RATIONALE:** Editorial suggestion to clarify that the examples apply to the three previously listed bases for performance, rather than simply to “treatment of certain conditions”.

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, Associate Director, International and Diversity Initiatives (esabin@avma.org; 800-248-2862, ext 6711) or Dr. Gail Golab, Director, Animal Welfare Division (ggolab@avma.org; ext 6618).

Sincerely,

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

WRD/GCG