



1931 N. Meacham Rd.
Suite 100
Schaumburg, IL
60173-4360
phone 847.925.8070
800.248.2862
fax 847.925.1329
www.avma.org

July 2, 2004

Dr. Debra Beasley
USDA-APHIS-VS
Sanitary International Standards Team
Riverdale, MD

Dear Dr. Beasley:

The AVMA appreciates the opportunity to provide comments on the OIE draft **Guidelines for the Slaughter of Animals for Human Consumption**. As requested, our comments are formulated for each section as a general statement, followed by suggested revised language where appropriate. Because we were uncertain as to the degree of editorial revision that would be welcome, we have refrained from such suggestions with the exception of where editorial revision has the potential to substantially improve readability or accuracy, or where we are already recommending substantive revision(s).

Regarding **Introduction to the OIE Guidelines for the Welfare of Animals...**

Article 1—Guiding principles for animal welfare, Article 2—Scientific basis for guidelines, and Article 3—Ethical basis for guidelines

We understand that revised language for articles 1, 2, and 3 was adopted (during the 72nd General Session of the OIE May 23-28, 2004) as part of a new Chapter that summarizes the **Guiding Principles for Animal Welfare**. In addition, the AVMA provided comments on the draft version of these articles in February of 2004. For these reasons, we are submitting no additional comments on this section of the document.

Article 4—Definitions

No comments.

Regarding **Guidelines for the Slaughter of Animals for Human Consumption...**

General comment...although these guidelines indicate that they are to apply to ratites and poultry (in addition to cattle, buffalo, sheep, goats, deer, horses, and pigs), there is little guidance provided regarding the unique needs and concerns associated with these species.

Article 1—General principles for slaughter

Personnel—"For this reason, there should be a sufficient number of personnel, who should be patient, considerate, competent, and familiar with the provisions in these guidelines and in the applicable legislation." Our understanding is that the OIE provides governments with its recommendations for action and that individual member states determine how to best apply these recommendations and through what programs (e.g., voluntary, legislative, or regulatory). The expectation is that personnel would be familiar with provisions in guidelines and regulations implemented by the member states, rather

than familiar with principles as issued by the OIE? We suggest the following revision
(deletion indicated by strikethrough, additions by underline): *For this reason, there should be a*

sufficient number of personnel, who should be patient, considerate, competent, and familiar with provisions in these guidelines and in the member state's applicable guidelines, legislation, and regulations.

Animal behavior—“In free-moving animals, to exploit herding and following behavior, animals for slaughter should be kept to the extent possible in the groups in which they were reared.” The meaning of ‘free-moving animals’ is not clear to us. Does this refer to species, such as cattle or hogs, which move relatively independently through passageways/races in comparison to poultry, which involve more direct transfer and handling by personnel? Or is this a reference to less facility-intensive approaches to production and slaughter? Clarification would be helpful. Assuming the prior meaning, we all know that in the United States cattle buyers often gather large groups of animals and ship them to slaughter. Therefore, retention of the phrase “to the extent possible” will be important if this point is expected to be applicable to US operations.

From a formatting standpoint, it also appears as though parentheses are missing around ‘i.e., tame’ in the last paragraph on page 5.

Article 2

Moving and handling animals—Bullet 7, which states “In the case of quadrupeds, manual lifting by a person should only be used in young animals or small species, and in a manner appropriate to the species; grasping or lifting such animals only by their wool, hair, feet, neck, ears or tails causing pain or suffering should not be permitted, except in an emergency where animal welfare or human safety may otherwise be compromised,” appears to conflict with bullet 1 of the section on “Methods for restraining and containing animals,” which states “Methods of restraint causing avoidable suffering, such as the following, should not be used in conscious animals: suspending or hoisting animals (other than poultry or rabbits) by the feet or legs.” The exception provided for poultry or rabbits in bullet 1 should also be provided in bullet 7.

Article 3—Lairage design and construction

Design—We believe that ‘level’ may be a more appropriate word choice than ‘horizontal’ in the last sentence of bullet 7. The suggested verbiage is: *Races should be ~~horizontal~~ as level as possible, but where there is a slope, they should be constructed to allow the free movement of animals without injury.*

Construction—Although flooring surfaces are addressed, there is no mention that bedding, if provided, must be maintained.

Article 4—Care in lairages

Much of the information in this section appears to duplicate that found in other parts of the guideline (e.g., bullets 1, 2, 4, 5, and 7). Perhaps the ad hoc working group could consider consolidating this information with the related information in articles 2 and 3?

Bullet 8—Veterinary treatment of animals that are “sick, weak, injured, or showing visible signs of distress” should be considered as an alternative to immediate killing. In addition, an option should be provided to allow animals that are exhausted or overheated to rest or cool before they are moved to slaughter or euthanatized. We suggest the following language: *Animals that are exhausted or overheated, but that are not in extreme distress, should be given an opportunity to rest or cool before they are moved to slaughter or killed. Other animals which that are sick, weak, injured, or showing visible signs of distress should be promptly treated by a veterinarian or killed immediately.* We note that, in general, the document does not appear to address many specifics associated with the management of ‘downer’ animals (other than to indicate that conscious animals should not be dragged).

This section contains a statement that indicates “Recommendations for specific species are described in detail in Appendices XXX.” It does not appear that these detailed descriptions have been provided for comment?

Article 5—Management of fetuses during slaughter of pregnant animals

Bullets 3 and 4—Recommendations regarding how much time should pass between the maternal neck or chest cut and opening of the uterus to remove the fetus are not consistent between these two bullets (i.e., bullet 3 recommends 15 to 20 minutes, whereas bullet 4 seems to find 5 minutes acceptable).

Bullet 5—We believe this statement is intended to be declarative (i.e., ‘if’ should be deleted so that the statement reads: *A living foetus removed from the uterus must be prevented from inflating its lungs and breathing air.*

Bullet 6—This bullet makes reference to a ‘captive bolt firearm,’ but does not distinguish between ‘penetrating’ and ‘nonpenetrating’ captive bolts. According to the expert advice of the members of the AVMA’s Panel on Euthanasia (as provided in their most recent report, the *2000 Report of the AVMA Panel on Euthanasia*, which is available at www.avma.org/resources/euthanasia.pdf), “The nonpenetrating captive bolt must not be used a sole method of euthanasia.” We recognize the panel’s report primarily addresses adult animals, whereas the guideline addresses neonates; however, we do believe it would be appropriate for the ad hoc working group to discuss whether it would be preferable to specify use of a ‘penetrating’ captive bolt.

The guideline, as written, also appears to suggest that a blow to the head is an acceptable means of euthanasia for neonates of all species covered by the guideline. This, too, contradicts advice provided by our euthanasia panel: “Euthanasia by a blow to the head must be evaluated in terms of the anatomic features of the species on which it is to be performed. A blow to the head can be a humane method of euthanasia for neonatal animals with thin craniums, such as young pigs, if a single sharp blow delivered to the central skull bones with sufficient force can produce immediate depression of the central nervous system and destruction of brain tissue. When properly performed, loss of consciousness is rapid. The anatomic features of neonatal calves, however, make a blow to the head in this species unacceptable.” We request that the ad hoc working group clarify its recommendation of ‘blow to the head’ by including appropriate species-specific information.

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.

Sincerely,

Gail C. Golab, PhD, DVM
Assistant Director, Communications
Staff Consultant, Animal Welfare Committee