



Animal Welfare Institute

900 Pennsylvania Avenue, SE, Washington, DC 20003
awionline.org phone: (202) 337-2332 fax: (202) 446-2131

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Submitted via Regulations.gov

RE: Docket No. APHIS-2021-0061; Proposed Framework for Advancing Surveillance for SARS-CoV-2 and Other Emerging Zoonotic Diseases through the American Rescue Plan

To Whom It May Concern:

The Animal Welfare Institute (AWI) Farm Animal Program submits these comments in response to the Animal and Plant Health Inspection Service's (APHIS) proposed American Rescue Plan Surveillance Program: Strategic Framework. AWI was established in 1951 to reduce the suffering caused by humans to all animals, including those raised for meat, poultry, and egg products. In furtherance of its mission, AWI works to advance policies that protect the welfare of animals used in agriculture, which also includes advocating for the use of acceptable and humane methods of killing animals on-farm for disease control purposes.

AWI welcomes this opportunity to provide comments on the strategic framework, especially as it relates to farm animals who serve as potential sources of disease and infection that can be transferred to humans and other animals. We appreciate the agency's attention to critical elements of addressing emerging diseases, including prevention, detection and investigation; however, a major piece of the puzzle when it comes to response and controlling spread—the killing of infected animals that pose a disease risk—has been entirely glossed over in the strategic framework. Any framework that seeks to help agencies identify and respond to the emergence of zoonoses in order to prevent the spread of disease must take into consideration the animals that are involved in these scenarios and how they can be killed humanely, if needed.

Though not an animal disease event, the supply chain disruptions caused by the COVID-19 pandemic provided a glimpse of what it would entail to depopulate animals, particularly pigs, at a large scale should there be a mass disease outbreak that has the potential to spill over to humans, as well as infect other animals. During this scenario, depopulation occurred on multiple operations using a number of different methods. Of particular concern was the use of extreme, inhumane methods of depopulation that resulted in immense animal suffering, including ventilation shutdown and ingestion of the chemical compound sodium nitrite. In order to ensure these methods are avoided in the future, APHIS must work with State and industry partners to ensure producers have access to more humane depopulation methods, particularly those categorized as “preferred” under the American Veterinary Medical Association's Guidelines for the Depopulation of Animals.

Ensuring humane depopulation of animals when disease is detected aligns closely with the “Investigate and Control Spread” focus area of APHIS's proposed strategic framework. One of

the listed objectives under this focus area is to “Ensure that the National Veterinary Stockpile has the necessary disinfectants, personal protective equipment, and other supplies needed to protect investigation teams from zoonotic transmission risks and prevent spillover events.” In addition to ensuring the NVS contains these very important supplies, APHIS should also prioritize the procurement and availability of supplies and equipment needed to humanely depopulate animals if needed to control the spread of a disease. Doing so is critical based on lessons learned from the COVID-19 supply chain crisis, during which the NVS was deployed to help producers with depopulation, but its supplies proved to be insufficient for the scope of the demand.

The need to improve the NVS by obtaining additional equipment and supplies for depopulation has also been recognized by the United States Animal Health Association (USAHA). In October of 2020, USAHA approved a resolution urging APHIS to “utilize the results of current and future research to critically review, increase, and update the available resources within the USDA National Veterinary Stockpile to support rapid response to mass depopulation crises involving swine and other farmed animal species.”¹ Additionally, several Members of Congress recently advocated for additional funding for the NVS to increase the availability of depopulation equipment.² While this request was made in the context of preparing for a potential outbreak of African Swine Fever—a virus that does not pose a risk to humans—it nevertheless demonstrates the need to increase APHIS’ capacity to assist with depopulation of large farm animals.

Thank you for the opportunity to provide input and for consideration of our comments.

Respectfully submitted,



Allie Granger
Policy Associate, Farm Animal Program
Animal Welfare Institute

¹ Letter from Members of Congress, to Nancy Pelosi, Speaker of the House, (Sept. 16, 2021) (on file with author).

² U.S. Animal Health Ass’n, Res. 1, 10, & 18: *National Veterinary Stockpile Resources for Mass Depopulation of Animals*, (Oct. 2021) (on file with author).