



Animal Welfare Institute

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Mr. Ryan Ruppert
Senior Director, Beef Quality Assurance
National Cattlemen's Beef Association
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Dear Mr. Ruppert:

We write on behalf of the Animal Welfare Institute (AWI) regarding the National Cattlemen's Beef Association's (NCBA) *Cattle Industry's Guidelines for the Care and Handling of Cattle and Beef Quality Assurance Manual*.

Since its founding in 1951, AWI has sought to alleviate the suffering inflicted on animals by people, and a major goal of our organization is to improve the welfare of animals raised for food. AWI monitors animal agriculture quality assurance programs, and we also regularly participate in the animal welfare standards-setting process of the World Organization for Animal Health ("OIE") through comments submitted to the US Department of Agriculture, Veterinary Services.

After reviewing NCBA's Beef Quality Assurance (BQA) program, AWI has determined that US beef industry guidelines are not in compliance with OIE standards in a number of instances. As you are aware, OIE is the intergovernmental organization dedicated to improving animal health worldwide. Its animal welfare standards are developed through expert scientific working groups and comments from its 178 member countries. It is our understanding that representatives of NCBA are currently participating in a process coordinated by the International Organization for Standardization ("ISO") to facilitate the international adoption of OIE animal welfare standards. Yet, it appears that NCBA itself has not adopted the OIE standards.

As you may know, last year the Canadian Cattlemen's Association published a new *Code of Practice for the Care and Handling of Beef Cattle*, which incorporates many provisions of the OIE chapter on beef cattle welfare. A committee of Canadian scientists reviewed relevant scientific research on a number of priority issues related to beef cattle welfare, and this information was used in the drafting of the Code of Practice. We encourage NCBA to undertake a similar process.

Below are examples of BQA cattle welfare standards that are inconsistent with scientific research and the international standards of the OIE. In many cases, the BQA standards are also inconsistent with the animal welfare policies of the American Veterinary Medical Association (AVMA).

1. Castration of cattle

BQA guidelines recommend that castration be performed prior to 4 months of age or when calves weigh less than 500 pounds. This exceeds the OIE recommended cut-off of three months. Additionally, unlike the OIE standards, BQA does not recommend that producers seek guidance from veterinarians on pain control (see attached standards comparison table). AVMA's *Literature Review on the Welfare Implications of Castration of Cattle* notes that all methods of castration "induce pain and physiologic stress in animals of all ages." Therefore, AWI encourages NCBA to revise its guidelines to recommend castration be performed before the age of three months, with analgesia and/or anesthesia as recommended by a veterinarian.

2. Dehorning of cattle

BQA guidelines for dehorning recommend that the procedure be performed by four months of age, before the diameter of the horn base grows to one-inch in diameter or more. AVMA policy recommends that dehorning be done at the earliest age practicable, and its *Literature Review on the Welfare Implications of Dehorning and Disbudding Cattle* recommends minimizing the pain associated with the procedure. However, BQA guidelines do not recommend that a veterinarian be consulted for providing pain management, as specified in the OIE standards and recommended by AVMA policy (see attached comparison table). Therefore, AWI urges NCBA to revise its guidelines to recommend that cattle undergo the dehorning at the earliest age possible, with analgesia and/or anesthesia as recommended by a veterinarian.

3. Hot-iron branding of cattle

Current BQA guidelines do not acknowledge that pain and stress are associated with hot-iron branding, and they also do not indicate a preference for alternative methods of identification. However, the AVMA policy on livestock identification recommends that "a high priority be placed on using alternatives to hot-iron branding," and OIE standards state a preference for "ear-tagging, ear-notching, tattooing, freeze branding and radio frequency identification devices" as permanent methods of identifying cattle (see attached comparison table). Therefore, AWI asks that NCBA revise its guidelines to recommend that alternatives to hot-iron branding be used for identification of cattle.

4. Tail docking of cattle

BQA guidelines do not acknowledge the practice of tail docking of beef cattle. However, AWI is aware that some beef producers in upper-Midwest states are docking the tails of animals who are being housed indoors at high densities on slatted floors. Both OIE and AVMA have taken a position in opposition to routine tail docking of cattle (see attached comparison table), based on research showing no benefit to the animal and additional research showing that increasing the space per animal and proper bedding are effective in preventing tail tip necrosis in cattle (see attached AWI fact sheet, *Routine Tail Docking of Beef Cattle*). *Canada's Code of Practice for the*

Care and Handling of Beef Cattle prohibits tail docking, except on the advice of a veterinarian, and recommends reducing stocking density in slatted-floor facilities to reduce tail injuries. In addition, cattle welfare experts Dr. Temple Grandin of Colorado State University and Dr. Dan Thomson of Kansas State University have told AWI that they oppose routine tail docking of beef cattle. Therefore, AWI urges NCBA to revise its guidelines to strongly recommend against tail docking and the practice of housing cattle indoors at high densities on slatted floors.

5. Protecting cattle from cold stress


BQA guidelines include actions to prevent or reduce heat stress in cattle, but protection from extreme cold is not addressed. While excessive heat may represent a greater threat to cattle welfare, excessive cold should not be ignored. OIE standards recommend animal handlers institute an emergency action plan during extreme cold conditions to provide cattle with shelter and appropriate feed and water (see attached comparison table). Moreover, Canada's Code of Practice for beef cattle recommends bedding to insulate against bare ground and to reduce mud and manure buildup on hides, which can increase heat loss. Therefore, AWI requests that NCBA revise its guidelines to include actions to address conditions of extreme cold.

In conclusion, AWI finds current NCBA's Beef Quality Assurance guidelines to be inadequate in providing an acceptable level of welfare for cattle raised for meat in the United States. We encourage NCBA to make the revisions described above to provide improved welfare for cattle and to better comply with domestic and international animal health and welfare standards.

Sincerely,



Dena Jones, M.S.
Farm Animal Program Manager



Kenneth Litwak, D.V.M., Ph.D.
Veterinary Advisor

Cc: Dr. Kathy Simmons, NCBA Chief Veterinarian

Attachments (2)