



Animal Welfare Institute

900 Pennsylvania Avenue, SE, Washington, DC 20003

January 20, 2022

American Veterinary Medical Association
1931 North Meacham Rd., Suite 100
Schaumburg, IL 60173-4360

Re: Animal Welfare Institute comment on AVMA's policy on "Contingency planning for animal emergencies"

Dear American Veterinary Medical Association:

Thank you for the opportunity to comment on the American Veterinary Medical Association's (AVMA) Policy on "Contingency planning for animal emergencies." I am submitting these comments as a long-standing AVMA member, a practicing veterinarian, and veterinary advisor for the Animal Welfare Institute (AWI) Farm Animal Program.

AWI was established in 1951 to reduce the suffering caused by humans to all animals, including those raised for meat, milk, and egg products. In furtherance of its mission, AWI works to advance policy efforts that improve conditions for animals used in agriculture while on the farm, during transport, and at slaughter. This includes ensuring the welfare of farm animals during emergencies, including recent situations that have presented unique challenges that ultimately had negative impacts on animal welfare.

We commend the AVMA for its extensive work on ensuring the veterinary community as well as producers are prepared in the wake of disasters and hope AVMA's policy will continue to stress the importance of proactive disaster preparedness. We urge the AVMA to explicitly include "animal welfare" as a chief consideration when it comes to contingency planning for animal operations. In addition, there are specific areas where the AVMA could enhance its work on preventing and addressing large scale animal emergencies.

AWI recognizes that AVMA's Emergency Preparedness and Response Guide provides a fact sheet on fire safety, focused on preventing and responding to fires within the home.¹ While this is very important information, AWI encourages the AVMA to expand on both these resources and its contingency planning policy by emphasizing the importance of fire safety and prevention on animal agricultural operations, particularly on large-scale confinement operations and within animal housing. AWI has conducted research which demonstrates that fires are a huge risk to animal safety. Between 2018 and 2021 alone, nearly 3 million animals were killed in barn fires.²

¹ American Veterinary Medical Association, *Emergency Preparedness and Response Guide*, (April 2012) https://ebusiness.avma.org/files/productdownloads/emerg_prep_resp_guide.pdf

² Animal Welfare Inst., *Barn Fires: A Deadly Threat to Farm Animals*, (January 2022) available at https://awionline.org/sites/default/files/publication/digital_download/22-Barn-Fire-Report.pdf.

These often-preventable incidents not only affect the animals, but undoubtedly the producers and veterinarians tasked with caring for them as well. As such, the AVMA contingency planning policy should make clear it encompasses fire safety and prevention for animal housing facilities, including those on animal agriculture operations. AWI also urges the AVMA to endorse adoption of National Fire Protection Association's Fire and Life Safety in Animal Housing Facilities Code, also known as NFPA 150. NFPA 150 provides minimum requirements for the design, construction, operation, and maintenance of facilities where animals are housed.³

Extreme weather also kills a staggering number of farm animals annually and is becoming increasingly common. For example, in 2018, 5.5 million poultry and pigs perished in hurricanes Florence and Michael and, in 2021, nearly half a million chickens died during a deep freeze in Texas. Given that there are currently no federal requirements for producers to provide animals with basic protections from extreme weather or to have written disaster preparedness plans, many opportunities to prevent animal suffering are missed. AWI encourages the AVMA to work with those in animal agriculture to take proactive measures to protect farm animals from extreme temperatures, severe storms, flooding, and other extreme weather events.

In addition to operational hazards and natural disasters, the COVID-19 pandemic has demonstrated that events outside the realm of our traditional thinking of "emergencies" can have severe impacts on animal welfare.⁴ For example, supply chain disruptions due to COVID-19 led to severe overcrowding and eventual depopulation of millions farm animals, in some cases via methods that caused significant and prolonged suffering.⁵ By emphasizing the need to prioritize animal welfare considerations during contingency planning, the AVMA can help decrease the risk of future depopulations and ensure that more humane euthanasia and depopulation methods, such as those classified as "preferred" in AVMA Guidelines, are readily accessible in the future.

Please see the Appendix below for the changes we recommend to the current policy on Contingency Planning for Animal Emergencies.

Thank you for the opportunity to provide input and for consideration of our comments. Please feel free to contact me at GwendyDVM@gmail.com or (305) 803-0211 should you have any questions.

Sincerely,



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³ NFPA 150. (*Fire and Life Safety in Animal Housing Facilities Code*, ed. 2022. Available at: <https://www.nfpa.org/codes-and-standards/all-codes-and-standards/list-of-codes-and-standards/detail?code=150>)

⁴ Grandin, Temple. "Methods to Prevent Future Severe Animal Welfare Problems Caused by COVID-19 in the Pork Industry." *Animals: an open access journal from MDPI* vol. 11,3 830. (Mar. 2021) available at <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8002123/>

⁵ Baysinger, A., Senn, M., Gebhardt, J., Rademacher, C., & Pairis-Garcia, M. "A case study of ventilation shutdown with the addition of high temperature and humidity for depopulation of pigs." *Journal of the American Veterinary Medical Association*, 259(4), 415–424. (2021) available at <https://doi.org/10.2460/javma.259.4.415>

Appendix 1

Recommended Changes to Policy Statement

Contingency planning for animal emergencies

The AVMA urges all appropriate agencies and stakeholders to develop, implement, and maintain contingency plans and resources to facilitate a rapid and effective coordinated response for all hazards and all species animal emergencies. **Protecting animal welfare through adequate planning, careful preparation, and conscientious implementation should be a priority.** The AVMA recommends all industries and stakeholders regularly assess and employ means of preventing or mitigating future animal emergencies, including adoption of NFPA 150, Fire and Life Safety in Animal Housing Facilities Code.