



Animal Welfare Institute

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March 10, 2011

Ohio Livestock Care Standards Board
Ohio Department of Agriculture
8995 E. Main Street
Reynoldsburg, OH 43068

RE: Proposed Standards – Beef Cattle

Dear Members of the Board:

I am writing on behalf of the Animal Welfare Institute (AWI) to offer comments regarding the proposed standards for on-farm treatment of beef cattle. We understand that the Ohio Livestock Care Standards Board (OLCSB) is currently addressing this issue.

Since its founding in 1951, AWI has been alleviating suffering inflicted on animals by people. Major goals of the organization include supporting high-welfare family farms and achieving humane slaughter and transport for all animals raised for food. In 2006 AWI launched a high-welfare food labeling program called Animal Welfare Approved (AWA). As part of this program AWA collaborates with scientists and farmers to set animal care standards. The program employs a highly trained field staff to audit farms for compliance with these standards, and communicates regularly with hundreds of family farmers in dozens of states, including Ohio. The program covers the full lives of the animals from birth through slaughter.

Background

Beef cow welfare can be improved significantly by changing a few key practices that are considerably detrimental to beef cattle well-being, as well as being unnecessary in the industry. Unfortunately, the Ohio Livestock Care Standards Board is squandering an opportunity and responsibility to eliminate unnecessary and inhumane practices that ultimately hurt both the perception of the industry as well as the well-being of the animals the beef industry relies on.

Addressing the Proposed Standards

Disbudding/Dehorning: Methods and Analgesia

AWI is disappointed in the OLCSB proposed standards regarding disbudding and dehorning. The “standard” fails to be a standard at all, meaning that farmers are provided no guidance regarding the method of disbudding or dehorning, the age at which to perform the procedure, or the use of pain medications. The standards require the procedures to be performed in “a humane manner,” yet fail to define the term humane. Similarly, the proposed standards require the use of pain management with dehorning, yet fail to describe how to successfully manage pain.

The proposed standards also allow disbudding without any pain management. However, disbudding and dehorning are *both* painful and stressful procedures and effective pain prevention is essential. A heated disbudding iron applied over the horn buds in young calves aged up to about two months (the age being determined by the size of the horn bud) is much *less* painful than dehorning, but the immediate pain can be reduced using a local anesthetic to provide a nerve block – this procedure has been used safely for decades and costs just pennies a shot.

The OLCSB’s proposed standards fail to take into account the policy position of the AVMA, which recognizes a need to reduce and eventually eliminate the need to dehorn due to the pain it causes the animals. The AVMA states, “minimizing pain associated with disbudding and dehorning is important to limiting the pain-stress-distress cascade that creates altered behavioral and physiologic states. Pre-emptive analgesia can be accomplished with sedation, general anesthesia, local anesthesia, pre- and postoperative administration of NSAIDS.” The AVMA also advises choosing polledness in selection indexes and long term breeding strategies.¹ However, the OLCSB so roughly outlines standards for current on-farm practices; it is not surprising that sound long term recommendations are left out entirely.

Housing

The housing “standards” fail in much the same ways as the issues above. Rather than outlining hard standards with specific stocking densities, stall sizes/measurements, bedding quantity and type, etc., the proposed standards lack details and guidance for housing, despite major welfare concerns.

Tie stalls, for instance, are a major welfare concern because they preclude normal cow behavior, such as grooming, socializing with other cows, and walking around. Even getting up and lying down behaviors are altered due to the cows being tied in stalls. Cows in tie stalls with minimal outdoor access have higher rates of lameness, skin injuries around the hock, and callosities at the carpal joints than cows in tie stalls with regular outdoor exercise or cows in loose housing with regular outdoor exercise. However, the OLCSB has failed to outline standards that would create a better housing system, such as renovating old tie-stall barns into free-stall barns over a phase-out period, and create economic gains in addition to improved animal welfare.

The proposed standards require that indoor housing of beef cattle in tie stalls “must be provided with the opportunity for exercise, weather permitting;” but, again, the OLCSB fails to create a standard with minimum units of time that cattle must be exercised, and outlining weather conditions that would make the exception to exercise.

Finally, regarding indoor housing stocking density, the OLCSB makes the provision that during indoor housing cattle are able to lie down and stand up, but fails to include the basic welfare provision that cattle also be able to turn around. The OLCSB should create standards that outline hard standards with specific stocking densities, stall sizes/measurements, bedding quantity and type, etc.

¹ AVMA, Reference. Backgrounder: Welfare Implications of the Dehorning and Disbudding of Cattle. Jan. 28, 2010.

Conclusion

AWI appreciates the opportunity to comment on the OLCSB's Proposed Standards for beef cattle, and urges the Board to make standards that include specific guidelines and descriptions of the practices that would be the minimum standard, rather than codifying the status quo, which is in fact not to have detailed or specific standards.

The OLCSB **must** create minimum standards that strive to increase, not decrease, the well-being of animals on the farm. It should be noted that AWI does not view compliance with the above recommendations as constituting humane treatment of farm animals, but merely as providing improved animal care. Please do not hesitate to contact me by phone at 202-446-2148 or email at elissa@awionline.org if you have any questions or require additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Elissa Sosland".

Elissa Sosland, M.S.
Farm Animal Program Associate