



Animal Welfare Institute

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February 23, 2011

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

RE: Dairy Cattle On-Farm Standards

Dear Members of the Board:

I am writing on behalf of the Animal Welfare Institute (AWI) to offer recommendations regarding the setting of standards for on-farm treatment of dairy cattle. We understand that the Ohio Livestock Care Standards Board 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

Dairy cow welfare can be improved significantly by changing a few key practices that are considerably detrimental to dairy cow well-being, as well as being unnecessary in the industry. The Ohio Livestock Care Standards Board has 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 dairy industry relies on. Establishing minimum standards in the dairy industry will not only improve animal welfare, but dairy farm profitability and the morale of people working with the animals.

An important factor for industry experts and the Board to consider is that making standards that reflect improvements for animal welfare takes into account the desires of the current and future dairy consumers. In a 2004 survey conducted by researchers at the Ohio State University, 92% of Ohioans agreed that it is important that farm animals are well-cared for, and 81% said the well-being of farm animals is just as important as the well-being of pets.¹ Those in the dairy industry should be mindful of customers' concerns. The Ohio Livestock Care Standards Board has an important opportunity to self-

¹ Rauch A & Sharp JS, *Ohioans Attitudes about Animal Welfare*, The Ohio State University, Social Responsibility Initiative, January 2005. http://ohiosurvey.osu.edu/pdf/2004_Animal_report.pdf.

regulate welfare concerns. AWI has identified the following key areas with recommended standards regarding particularly inhumane practices.

Recommended Standards

Tail Docking

Scientific literature does not support any evidence that tail docking is a beneficial practice, for the animal, worker, or milk product. With no benefits to the milk quality as a result of tail docking and clearly no benefit to the cow herself, then, the welfare of the cow is compromised essentially as a trade-off for the milker's comfort. Tail docking can cause chronic pain when continued growth of damaged nerve axons may result in the formation of a mass of tangled axons (neuroma). Tetanus and gangrene have been reported after tail docking, since the necrotic tissue on the distal tail is prone to infection with pathogens. Fly avoidance behaviors are increased in docked cattle and there can be long-term behavioral effects. Problems with flies can cause increased stress, reduced milk production and weight gain, disrupted grazing, and reduced growth. Observed fly avoidance behaviors include stomping, kicking the trunk, tail swishing, skin twitching, head and ear motion, and taking flight.

Many in the industry who dock cite cow cleanliness as a primary reason for implementing the practice, yet results from a 2007 survey of dairy farmers across the nation, conducted by the United States Department of Agriculture, actually show that farms that dock tails have dirtier cows than those who keep tails intact.² Dairy farmers must heed these findings and alter practices accordingly by prohibiting the practice of tail docking in on-farm standards. Additionally, the American Veterinary Medical Association (AVMA), American Association of Bovine Practitioners (AABP), and National Milk Farmers (NMF) already have policy positions against the practice of tail docking.³ Further, the New Jersey Supreme Court ruled that tail docking is not a humane practice. This ruling came as a result of a challenge to the New Jersey Department of Agriculture's failure to set appropriate on-farm care standards by exempting all "routine" husbandry practices from review and deeming them all humane.⁴

- AWI recommends **prohibiting** tail docking of dairy cattle.
- In the remote case where a tail must necessarily be docked to save an animal's life or relieve an animal's pain, the tail **must** be docked only by a licensed veterinarian, and pain relief through local anesthesia and analgesia **must** be used.

² U.S. Department of Agriculture. National Animal Health Monitoring Service. Dairy 2007.

³ AVMA, Policy: Tail Docking of Cattle, April 2009; AABP Opposes Routine Tail Docking, JAVMA News, June 1, 2010; National Milk Producers Federation, National Dairy Farm Program: Animal Care Manual, 2009, p. 17.

⁴ New Jersey Society for the Prevention of Cruelty to Animals, et al. v. New Jersey Department of Agriculture, et al. Decided July 30, 2008. 196 N.J. 366, 955 A.2d 886. "Although we recognize the considerable expertise that the Department brought to bear in reaching its decision to include tail docking within its list of permitted practices, it is difficult to find in this record any support for this particular practice, and none that meets the requisite standard of our review. The record amply demonstrates that, far from being humane, this practice is specifically disparaged by both the AVMA and the CVMA as having no benefit and as leading to distress. The only scientific evidence that even suggests that the practice might have some possible benefit is inconclusive at best."

- Seasonal switch trimming may be promoted as a humane and viable alternative to tail docking.

Housing

Tie stalls 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. Mammary infections and/or teat injuries have been found to be more common in cows kept in tie stalls compared to cows kept in free stalls or straw yards. Studies show increased prevalence of mastitis-associated environmental streptococci with tie stall use. Tied cows have been shown to have more need for disease treatment overall and a higher culling rate, with increased occurrences of parturient paresis, bloat, and hoof and leg disorders. 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.

- AWI recommends that tie stalls be **prohibited** for all new construction of dairy housing.
- Where tie stalls already exist, methods **must** be implemented to increase cow comfort, such as increased bedding to make it easier for cows to lie down and get up.
- Free-stall barns allow cows freedom of movement, socialization, and the ability to lie down where they want. Therefore, producers should be encouraged to remodel older tie stall barns and turn them into free stall barns.
- All cows **must** be allowed outdoor access, except during extreme weather conditions, for a minimum of 2 hours per day.
- Calves, whether housed in hutches or pens, **must** be provided enough space to stand up, lie down, turn around, rest and groom themselves without hindrance. Crates or individual stalls that do not allow performance of these behaviors are **prohibited**.

Disbudding/Dehorning: Methods and Analgesia

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, where the horns are cut off with a saw, horn shears or cutting wire and the exposed blood vessels cauterized to prevent hemorrhage. Disbudding with a hot iron is preferable to dehorning.

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 AVMA 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.⁵

- AWI recommends that disbudding be performed within the first week of life by hot iron disbudding. Scooping should be **prohibited**. Caustic paste may be used on calves under 7 days of age.
- Disbudding performed after 2 months of age **must** be done with local anesthesia and analgesia.
- Post procedure analgesia: Pain can persist 24 hours or more; this longer-lasting pain can be reduced using non-steroidal anti-inflammatory drugs. Providing calves a sedative before the procedure can reduce handling stress and make the procedure easier to carry out.
- Dehorning **must** be carried out only by a licensed veterinary surgeon and only when deemed essential. It should not be a routine procedure. If dehorning must be performed, analgesics **must** be used in addition to local anesthesia.

Conclusion

AWI appreciates the opportunity to offer recommendations on farm animal care standards for Ohio, and appreciates your consideration of our comments as you prepare proposed regulations for on-farm treatment of dairy cattle. 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 are interested in additional information.

Sincerely,



Elissa Sosland, M.S.
Farm Animal Program Associate

⁵ AVMA, Reference. Backgrounder: Welfare Implications of the Dehorning and Disbudding of Cattle. Jan. 28, 2010.