



Animal Welfare Institute

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April 8, 2011

Ms. Patricia Atkins
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Avenue, SW
Room 2646-So, Ag Stop 0268
Washington, DC 20250-0268

Re: AMS-NOP-11-0014; NOP-11-05; Meeting of the National Organic Standards Board

Dear Ms. Atkins:

I am writing on behalf of the Animal Welfare Institute (AWI) to offer comments on several animal welfare-related topics currently under discussion by the National Organic Standards Board's (NOSB) Livestock Committee. These topics include several issues in the Proposed Recommendation for Animal Handling, Transport, and Slaughter.

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 covers the full lives of the animals from birth through slaughter. At present a number of AWA-certified farmers also participate as certified producers under the National Organic Program (NOP).

AWI applauds NOP's effort to outline program standards to ensure better animal welfare, but would like to see improvements to the proposal that ensure good animal welfare as the priority, and not try to "fit" animal welfare to conventional practices.

Handling and Transport

AWI appreciates the inclusion of general handling and transport guidelines in the proposed NOP animal welfare standards.

Fitness for Transport

AWI commends the NOP's recommendation to adopt guidelines on fitness to transport. However, we believe the discussion guidelines declaring young animals as unfit for transport if they are "less than 48

hours old” is too broad to cover the needs of various species and sets the minimum age of transport much too low.

The proposed standards state, “(1) calves must have a dry navel cord and be able to stand and walk without human assistance if they are being transported to a slaughter or auction facility.” We agree that young, unweaned animals have special needs and are far more susceptible to transport-related stresses than mature animals. Calves MUST be able to walk easily without human assistance; otherwise there are severe welfare problems with transporting these animals. AWI recommends that a time period be specified in addition to the current proposed language so that “calves of less than 10 days of age” are prohibited from transport, unless it is for medical purposes to treat or save the animal. Consequently, we recommend that the length of transport be clarified, and that limits be placed on the transport of young pigs and sheep as well as young calves.

Pigs of less than 3 weeks of age, lambs of less than one week and calves of less than 10 days of age shall not be transported, unless the distance traveled is less than 50 miles.¹

Transport Time

The proposed standards recommend, “(4) Arrangements for water and organic feed must be made if transport time exceeds twelve hours.” AWI commends NOP for proposing more stringent transport standards than the woefully inadequate federal Twenty-Eight Hour Law. However, a lower maximum transport time must be set for poultry.

For birds, the time between the start of loading at the farm and the completion of unloading of transport trays at the slaughter establishment must be less than 6 hours.

Use of Prods

The proposed standards allow for the use of electric prods “for medical use only, i.e., in an effort to save down animals.” Because prods should only be used when an animal has the ability to avoid them, it is difficult to use a prod humanely to “save down animals.”

Any animal who cannot stand or walk easily is not fit for transport. Non-ambulatory animals should not be sent to market or slaughter and should only be transported in order to be treated or humanely euthanized. Additionally, down animals should be humanely euthanized if they become non-ambulatory during transport.

Slaughter

Slaughter guidelines should be strengthened by prohibiting the slaughter of any animal unable to stand and walk.

¹ Standard is consistent with the European Union regulation on transport. See Council Regulation (European Commission) No.1/2005 of 22 December 2004, *The Protection of Animals During Transport and Related Operations* (Annex I, Chapter I, Fitness for Transport).

All animals unable to stand and walk upon arrival at a slaughter establishment, or who become nonambulatory while on the premises of the slaughterhouse, must be promptly and humanely euthanized.

Making these modifications will lessen animal suffering and help bring organic standards closer to what consumers expect of the label. The Livestock Committee's goal of making the organic seal "the gold standard" for humane treatment is commendable but can only be realized if the current recommendations are strengthened.

Conclusion

AWI commends the NOSB's Livestock Committee for taking the initiative to improve NOP's animal welfare standards. While AWI is far from satisfied with the proposed recommendations, we understand that clarifying all relevant welfare issues will take time and believe that the discussion document is a good start.

We are aware that NOSB reviewed several existing sets of standards, including AWI's Animal Welfare Approved program, in drafting its recommendations. However, the various programs reviewed represent quite a broad range in terms of the quality of these standards. We view the concept of organic production as being consistent with the standards of the Animal Welfare Approved program, and as being above the baseline level of welfare set by the American Humane Certified and Certified Humane programs. Accordingly, we urge NOSB to adopt the recommendations described above. AWI would like to see NOP recommend rulemaking action for these standards.

Thank you for considering our comments.

Sincerely,

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

Elissa Sosland, M.S.
Farm Animal Program Associate