



1931 N. Meacham Rd.
 Suite 100
 Schaumburg, IL
 60173-4360
 phone 847.925.8070
 800.248.2862
 fax 847.925.1329
 www.avma.org

April 5, 2005

Dr. Debra Beasley
 USDA-APHIS-VS
 NCIE/Sanitary International Standards Team
 Unit 33
 Riverdale, MD 20737

Dear Dr. Beasley:

The AVMA appreciates the opportunity to provide comments on the OIE draft **Guidelines for the Humane Killing of Animals for Disease Control Purposes, Guidelines for the Slaughter of Animals for Human Consumption, Guiding Principles for the Land Transport of Animals, and Guiding Principles for the Transport of Animals by Sea**. Our comments are formulated as requested, unless questions of interpretation are involved that do not lend themselves to the desired format for recommendations. Because we were uncertain as to the degree of editorial revision that would be welcome, we have refrained from such suggestions with the exception of where editorial revision has the potential to substantially improve readability or accuracy, or where we are already recommending substantive revision(s). There are a number of typographical and grammatical errors throughout the texts that should be addressed during a careful final review of each. Suggested deletions are ~~struck through~~, suggested additions are underlined.

Regarding **Guidelines for the Humane Killing of Animals for Disease Control Purposes...**

Article 3—Responsibilities and competencies of the specialist team

“Veterinarian,” bullet 5, under “Responsibilities”—Appears to imply that the team leader could not be the veterinarian? Until this point in the guidelines, it appears that having the veterinarian be the specialist team leader, although not a requirement, is an option.

Article 4—Operational guidelines

Bullets 8 and 10, under “Planning the humane killing of animals”—Although these bullets point to biosecurity and environmental impact, it appears that these are “must” situations, rather than “should” situations as indicated in the introductory paragraph for this section. Specialist teams must develop official contacts with local governmental offices to ensure that biosecurity precautions are appropriate and disposal methods are compatible with geographic composition (e.g., soil type, water tables). Both biosecurity and environmental considerations may affect decisions to bury, burn, or transport carcasses out of the area.

Article 5—Species-specific recommendations

General comment— Humane killing of horses does not appear to be addressed by this document. Their omission is of concern to us, because in the United States, federal law (and some state law) includes equids in its definition of livestock. We would be pleased to assist the workgroup by providing appropriate information on preferred methods of

euthanasia for this species. An applicable reference is the *2000 Report of the AVMA Panel on Euthanasia*, which may be accessed at: www.avma.org/resources/euthanasia.pdf.

Poultry—Cervical dislocation is not included as a humane method of euthanasia, unless birds are first rendered unconscious. This conflicts with the recommendations of the *2000 Report of the AVMA Panel on Euthanasia*. Failure to include this inexpensive method of euthanasia, which is considered by the members of the Panel to be humane when properly performed by trained personnel, may create situations where individuals in countries with limited resources may not choose any of the remaining methods and, instead, resort to burying birds alive or setting them on fire. This has already been observed to happen as poultry facilities attempt to deal with outbreaks of H5N1. We recommend including cervical dislocation in the tabular summary as a method requiring restraint and with the following animal welfare concerns: “requires excellent technical competence, nonlethal injury.”

Article 6—Free bullet

Add as second bullet under “Requirements for effective use”—“Appropriate vision and hearing protective devices should be worn by all involved personnel.” Protective gear is an important part of both operator and observer safety that should be specifically identified.

Article 7—Penetrating captive bolt

Introduction—Because a properly administered blow from a penetrating captive bolt may result in immediate death without the need for additional pithing or bleeding, we suggest the text in the last sentence of the second paragraph be amended to read: “...may result in death. However, in the case of a questionable or improperly administered blow from a penetrating captive bolt, pithing or bleeding should...”

Article 8—Captive bolt–nonpenetrating

Figure 5—Words appear to be missing from the figure caption.

Bullet 7, under “Requirements for effective use”—In our opinion, bleeding is a “must” requirement for the use of the nonpenetrating captive bolt on non-neonatal animals, not a “should.” According to the *2000 Report of the AVMA Panel on Euthanasia*, “A nonpenetrating captive bolt only stuns animals and should not be used as a sole means of euthanasia.” We therefore suggest this bullet be modified as: “...bleeding ~~must~~should be performed as soon as possible after stunning.”

Article 12—CO₂/air mixture

“Method 2,” bullet 3 under “Requirements for effective use in a poultry house”—Suggest revision to end of sentence to clarify and improve readability: “...when birds are housed at their maximum stocking density at the highest level of birds.”

Article 15—Lethal injection

Bullet 3 under “Requirements for effective use”—“Intravenous administration is preferred, but intraperitoneal or intracardiac administration may be appropriate, especially if the agent is non-irritating.” The AVMA believes that intracardiac injection is only acceptable when performed on heavily sedated, anesthetized, or comatose patients. Intraperitoneal administration of a nonirritating euthanasia agent is acceptable, provided the drug does not contain neuromuscular blocking agents. Intramuscular, subcutaneous, intrathoracic, intrapulmonary, intrahepatic, intrarenal, intrasplenic, intrathecal, and other nonvascular injections are not acceptable methods of administering injectable euthanasia

agents. We therefore suggest the following replacement for bullet point 3: “Intravenous administration is preferred. Intracardiac injection is only acceptable when performed on heavily sedated, anesthetized or comatose patients. Intraperitoneal administration of a nonirritating euthanasia agent is acceptable, provided the drug does not contain neuromuscular blocking agents. Intramuscular, subcutaneous, intrathoracic, intrapulmonary, intrahepatic, intrarenal, intrasplenic, intrathecal, and other nonvascular injections are not acceptable methods of administering injectable euthanasia agents.”

Additional bullet under “Disadvantages”—“Care should be taken to avoid environmental contamination while disposing of the carcasses of animals killed using high doses of anesthetic and sedative drugs.” Some drugs may persist in the carcass and may cause sedation or even death of animals that consume the body.

Article 17—Killing methods in unconscious animals

“Method 1, Cervical dislocation (manual and mechanical),” under “Conclusion”— See previous comments. Although we recognize that data suggest that electrical activity in the brain persists for 13 to 14 seconds following cervical dislocation, more recent studies and reports indicate that this activity does not infer the ability to perceive pain. Therefore, the members of our Panel on Euthanasia advise that cervical dislocation can be a humane choice for euthanasia of conscious animals, if performed properly by skilled personnel. We recommend the conclusion be modified to read: “...is suitable for killing unconscious poultry, provided it is performed properly by trained personnel.” Our panel members drew the same conclusion regarding decapitation (Listed as Method 2 under article 17).

“Method 3, Pithing,” under “Introduction”—Use of a penetrating captive bolt can result in immediate death (i.e., pithing is not always necessary). For this reason, we suggest the following revision: “...pithing is a method of killing animals when use of a penetrating captive bolt has not resulted in immediate death.~~which have been stunned by a penetrating captive bolt.”~~

“Method 4, Bleeding,” under “Advantages”—The text in the single bullet appearing in this section seems to imply that pithing is always the primary choice for killing after stunning. This may not always be a valid conclusion.

Comments that apply to both **Guiding Principles for the Land Transport of Animals** and **Guiding Principles for the Transport of Animals by Sea...**

General Comment—Both documents require Competent Authorities to do numerous things. In Article 1, these include: 1) establishing minimum standards for animal welfare, 2) setting standards for the competence of drivers, animal handlers and managers, 3) establishing an accreditation system or interaction method to implement the standards, and 4) monitoring and evaluating the use of veterinary medications. In Article 2, these include creating an independent body, accredited by the Competent Authority, to assess compliance of animal handlers and to issue certificates of competence. It appears that in the United States, several different authorities will need to address these duties (e.g., item 4 may be a state veterinary board, rather than USDA)? The AVMA is somewhat uncomfortable with this expansion of authorities. Certainly, this could become quite onerous for USDA?

Article 6—Loading

There is a difference between the two documents in this section. The sea transport document allows use of unmuzzled dogs: “The use of well-trained dogs to help with the loading of some species may be acceptable.” The document on land transport, however, requires the dogs to be muzzled? These documents need to be harmonized or the reason for the difference clarified.

Specific comments regarding **Guiding Principles for the Land Transport of Animals...**

Article 3—Planning the journey

Bullet 1, sub-bullet 7, under “Nature and duration of the journey”—“driving quality” should not be a factor in determining the maximum duration of a journey because driving skills should always be required to be high. We suggest deleting the phrase “driving quality” from the sub-bullet.

Bullet 4, under “Space allowance”—We suggest the wording of this bullet be changed to: “...adopt a balanced position as is appropriate for the environment and species being transported. ~~without body contact with other animals~~” Excessive space for animals can be as detrimental as insufficient space. For example, in cold weather, more birds may need to be placed in a coop to ensure good thermoregulation.

Bullet 2, under “Other considerations”—“...transportation during the night may reduce ~~heat~~thermal stress...”

Article 6—Loading

Bullet 2, under “Experienced supervision”—Would it not be more accurate to state: “Loading should be supervised and/or conducted by animal handlers”?

Article 7—Travel

Bullet 4, under “Sick, injured and dead animals”—Verbiage refers to “products,” when it appears that what is really meant is “waste products.” We suggest revision as: “...or the waste products of the transported animals...”

Article 8—Unloading and post-journey handling

Bullet 2, under “General”—“Unloading should be supervised and/or conducted by an animal handler...”

Bullet 1, under “Cleaning and disinfection”—Disease control should always be a concern. We therefore suggest the following revision to the last sentence of this bullet: “This should be followed by disinfection. ~~when there are concerns about disease transmission~~”

Specific comments regarding **Guiding Principles for the Transport of Animals by Sea...**

Article 1—Responsibilities

Sub-bullet 1, bullet 5—Suggest revision to: “...available for loading, unloading, and caring for animals...”

Sub-bullet 1, bullet 11—This text indicates that the veterinarian should meet with the Master, Chief Officer and the senior animal handler on a daily basis. As far as we can

determine, nothing in the text prior to this required the veterinarian to be on-board the vessel?

Article 2—Competence

Sub-bullet 5, under bullet 3—Suggest revision to: “...including cleaning and disinfection.”

Article 3—Documentation

Sub-bullet 1, under bullet 3—Suggest revision to: “...disinfection of the vessel and equipment/containers/crates.”

Article 4—Planning the journey

Sub-bullet 3, under bullet 2 of “General”—Clarification is needed as to what is meant by the “nature” of the journey?

Article 5—Pre-journey period

Bullet 1, under “General”—Suggest revision to: “...thoroughly cleaned and disinfected (treated for animal and public health purposes), ...”

Article 7—Travel

Bullet 2, under “Inspections”—The text seems to require that stocking densities be adjusted within 48 hours of departure. Why? If stocking densities are appropriate, why is it necessary to make adjustments?

Bullet 4, under “Sick and injured animals”—The statement is made that “All drugs and products should be used in accordance with the manufacturer’s recommendations.” This statement will preclude extralabel use and will create problems, particularly for minor species. We suggest the following remedy: “...used in accordance with the manufacturer’s or veterinarian’s recommendations.”

Regarding **Guidelines for the Slaughter of Animals for Human Consumption...**

Preface

The approach to religious slaughter taken by this document may be inconsistent with approaches in US federal and state statutes. It is our understanding that if shackling and hanging is considered part of religious preparation, inspectors in the United States cannot interfere with that process or request preslaughter stunning.

Article 1—General principles for slaughter

Paragraph 3, under “Animal behavior”—Reference is made to “no flight zone” for animals reared in close proximity to humans. It seems more reasonable that every animal has a flight zone, although that zone may be considerably smaller for animals with early and regular exposure to human handlers. We suggest alternate wording as “...i.e., tame, may have ~~no~~ a small flight zone, whereas...”

Article 5—Management of fetuses during slaughter of pregnant animals

Bullet 4—Text suggests the use of a captive bolt to kill the fetus should consciousness be in question. Would appropriately sized captive bolts be readily available for this purpose?

Article 7—Stunning methods

Bullet 1, under “Stunning”—There appears to be a reference to footnote 1, but we could not identify that footnote in the text.

Sheep diagram—The optimum position diagrammed for sheep in the figure implies the intersection of two imaginary lines (as described for cattle), but the accompanying figure caption does not use this approach (i.e., the caption appears to be more in line with the diagram for the pig).

Article 8—Summary of acceptable stunning methods and the associated animal welfare issues

The comment box for “electrical” indicates that “Where cardiac arrest occurs, the carcass may not be suitable for Halal.” It is not clear to us that this is acceptable for Kosher either? If not, then this should also be referenced in the comment box.

The comment boxes for “gaseous” indicate that these methods may not be suitable for Halal. Again, is gaseous acceptable for Kosher? If not, then Kosher should also be referenced.

Once again, we very much appreciate the opportunity to respond. Should you have questions or require additional information, please do not hesitate to contact me. I may be reached at the phone number as provided in the letterhead (ext. 6618), or you may contact me on my direct line at 847-285-6618 or via e-mail at ggolab@avma.org.

Sincerely,

A

Gail C. Golab, PhD, DVM
Assistant Director, Communications
Staff Consultant, Animal Welfare