

National Organic Standards Board (NOSB) Livestock Committee

PROPOSED ORGANIC ANIMAL WELFARE GUIDANCE AND STANDARDS

Animal Health and Living Conditions

DISCUSSION DOCUMENT

March 10, 2009

Introduction

The humane treatment of livestock in organic systems is an integral part of the expectations of organic consumers. Accredited certification agencies are charged by USDA NOP to enforce the regulations. Annual inspections or others if deemed necessary are conducted by the ACA. However, inspectors need to have straight forward assessment guides in order to make sure that animal welfare goals are met with objectivity. This is critical since animal welfare evokes strong subjective responses from different people. The current regulations are vague in regards to performance metrics within the organic livestock production system. As the conventional livestock industry develops animal welfare standards, the organic livestock industry must meet and exceed those set by the conventional industry. In short, all species of animals and birds must be assessed for body condition, lameness, neglected health problems, coat/feather condition, and cleanliness. These five animal based measures are core criteria that are the outcomes of problems with animal management. Numerical scoring should be done to arrive at a final number from which a passing or failing grade can be issued. If failing, remedies will need to be instituted and the operation reassessed.

Background

At the November 2007 NOSB meeting, Dr. Kathleen Merrigan of Tufts University and Margaret Wittenburg of Whole Foods Market each gave a short presentation to the Board prior to public comment. Dr. Merrigan, the primary author of the Organic Foods Production Act of 1990, spoke of how the time is right to more fully describe improved health and living conditions for organic livestock, since soil and crop issues were the initial focus of organic agriculture.

Indeed, the regulations in livestock sections 205.238 and 205.239 lack specificity in outcome measurements for livestock on organic farms. For instance:

§ 205.238 Livestock health care practice standard

205.238 section (a) states: The producer must establish and maintain preventive livestock health care practices, including

205.238 (a)(2) requires a feed ration sufficient to meet nutritional requirements; yet does not state how the animals look (appear visually as assessed by body condition score) – are they too skinny or are they too fat?.

205.238 (a)(3) requires the establishment of appropriate housing, pasture conditions, and sanitation practices to minimize the occurrence and spread of diseases and parasites; however, there is no objective frame of reference regarding animal appearance for the inspector to measure compliance. Objective assessment of hair coat condition for external parasites and cleanliness of legs and body would be appropriate.

205.238(a) (4) provision of conditions which allow for exercise, freedom of movement, and reduction of stress appropriate to the species; however, if an animal is significantly lame these provisions cannot be fulfilled.

205.238 (a)(5) performance of physical alterations as needed to promote the animal's welfare and in a manner that minimizes pain and stress; how is this inspected? Are records monitored to make sure that individual animals undergoing physical alterations are individually identified and the associated pain relief recorded?

205.238 section (c) states: The producer of an organic livestock operation must not:

(7) Withhold medical treatment from a sick animal in an effort to preserve its organic status. All appropriate medications must be used to restore an animal to health when methods acceptable to organic production fail. Livestock treated with a prohibited substance must be clearly identified and shall not be sold, labeled, or represented as organically produced.

When asked how is it possible that animals are treated humanely when they are sick and antibiotics are prohibited, representatives of the organic industry will often times cite 205.238(c)(7) to illustrate that the law requires all appropriate medications to be used to restore an animal to health. However, the complete picture is that if a prohibited material such as an antibiotic is used, the animal must then be permanently removed from organic production. The reality then becomes whether or not all appropriate medications were used and, perhaps more importantly, when in the course of illness were they instituted? Withholding treatment is clearly illegal – how is an inspector to evaluate such instances? And if the instances construe a systemic method of management by neglect, how is the inspector to report this? Additionally, the inspector should be able to visually assess all individual animals in the herd for signs of un-treated or neglectful health management.

§ 205.239 Livestock living conditions.

(a) The producer of an organic livestock operation must establish and maintain livestock living conditions which accommodate the health and natural behavior of animals, including:

(1) Access to the outdoors, shade, shelter, exercise areas, fresh air, and direct sunlight suitable to the species, its stage of production, the climate, and the environment; in the case of poultry, what kind of access to the outdoors and what areas have direct sunlight?

(2) Access to pasture for ruminants; are the actual laneways to the pasture causing lameness due to poor construction or management? How many animals are lame? This is important both for producer and consumer since animals must be able to get to the pasture and then walk around to effectively graze.

(3) Appropriate clean, dry bedding. If the bedding is typically consumed by the animal species, it must comply with the feed requirements of § 205.237; however, this does not indicate whether or not the animal is actually clean, just that the bedding is. And - is there enough clean, dry bedding? Therefore, an inspector may see clean, dry bedding on the day of inspection but the animals are obviously not clean. How can this be addressed? Objective assessment of cleanliness would seem appropriate.

DISCUSSION

The Livestock Committee needs to discuss how best to deal with some of the vague statements shown above. One way would be to recommend a rule change in the simplest terms. Suggested additions as Rule changes are underlined in the following examples. Notice these are short and show end points/goals.

1) For example, in 205.239(a)(3), “appropriate clean, dry bedding that results in clean animals”

Then, in a Guidance Document, standard Cleanliness Scoring can be a guide from which ACAs and inspectors can work.

Cleanliness Scoring – All animals and birds would be scored for cleanliness except pigs which are given access to mud wallows. A 4 point scoring system will be used for both animals and birds.

Score 1. The entire animal or bird is clean except its feet and lower half of the legs. Animals on lush green pastures often have soiled lower legs.

Score 2. Both the upper and lower legs are soiled and the body/breast and sides are clean.

Score 3. Both the legs and belly/breast are soiled.

Score 4. The legs, belly/breast and sides of the body are soiled.

Animal experts suggest that ninety-five percent of the animals or birds should have a cleanliness score of 1 or 2.

2) For example in 205.238(a)(2), “ Provision of a feed ration sufficient to meet nutritional requirements, including vitamins, minerals, protein and/or amino acids, fatty acids, energy sources, and fiber (ruminants) that results in appropriate body condition;”

Then, in a Guidance Document, standard Body Condition Scoring can be a guide from which ACAs and inspectors can work

Diagrams and photos will be needed for each species.

For dairy animals, the stage of lactation needs to be taken into account when looking at body condition.

Body Condition Score 1. Emaciated with both the ribs and the spinal vertebrae clearly visible. There should be 0% score 1 animals on a farm.

Body Condition Score 2. The animal is thin and in poor condition. Maximum of 5% of the animals.

Body Condition Score 3. Ideal body condition. Ribs and spinal vertebrae are not visible.

Body Condition Score 4. Slightly overweight animals.

Body Condition Score 5. An obese animal. This condition is also not acceptable.

Body Condition of Dairy Cattle – Insert diagrams and photos

Body Condition of Beef cattle – Insert diagrams and photo

Body Condition of Swine – Insert diagrams and photos

Body Condition of Sheep – Insert diagrams and photos

Body Condition of Goats – Insert diagrams and photos

Animal experts suggest that there must be no animals with emaciated body condition score of 1, when a 5 point scale is used to score body condition. There needs to be a cut off level for the percentage of skinny body condition score 2 animals that would be allowed. A maximum of 5% of the animals with a skinny score of 2 when a 5 point scale is used could be the limit.

3) For example, in 205.238 (a)(3) requires the establishment of appropriate housing, pasture conditions, and sanitation practices to minimize the occurrence and spread of diseases and parasites that results in full coats of hair or feathers.

Then, in a Guidance Document, standard Coat Condition Scoring can be a guide from which ACAs and inspectors can work.

Score 1. Normal coat or feathers. Shedding of hair and molting of feathers is a normal process and should be classified as a normal coat.

Score 2. Untreated parasites. On cattle, a single bald spot of more than one bald spot with a total bald area larger than a 6-inch diameter circle would be classified as untreated parasites. Scoring systems will need to be determined for sheep and birds.

Animal experts suggest that 95% of the animals should have normal coats or feathers.

4) For example, in 205.238(a) (4) provision of conditions which allow for exercise, freedom of movement, and reduction of stress and lameness appropriate to the species; and 205.239(a)(2) Access to pasture for ruminants;

Lameness – For all mammals, 95% of the animals should walk with no obvious limp. To simplify assessment of farms, the certifiers should classify animals as either lame or not lame. On a 5 point lameness scoring system, animals that score as 3, 4, or 5 would be classified as lame.

Score 1. Completely normal walking

Score 2. No obvious limp, but may have slight gait abnormalities. Do not classify as lame for regulatory purposes.

Score 3. Classify as lame all animals that walk with an obvious limp. Animals with a score 3 are able to keep up with their herd or flock mates when the group is walking.

Score 4. Classify as lame all animals that walk with an obvious limp and refuse to bear their full weight on one or more legs. Score 4 animals are not able to keep up with their herd or flock mates when the group is walking.

Score 5. Classify as lame all animals that have great difficulty walking. Score 5 animals are barely able to walk. Classify as non-ambulatory all animals that are not able to walk.

For broiler chickens, lameness (gait scoring) should be done at the end of the growing period, preferably within 48 hours before transport to the slaughter plant. A simple 3 point scoring system should be used.

Score 1. Birds walk evenly for 10 paces

Score 2. Classify as lame birds that walk with an uneven gait for 10 paces.

Score 3. Classify as lame or non-ambulatory, birds that are not able to walk 10 paces.

Animal experts suggest that to pass on lameness scoring, a farm must have 5% or less lame animals. Lame animals are defined as score 3,4,5 on a 5 point lameness scale. For birds, lameness is defined as score 2 and 3 on a 3 point scale.”

5) For example in 205.238 (a)(5) performance of physical alterations as needed to promote the animal’s welfare and in a manner that minimizes pain and stress with dates and methods recorded in individual animal health records and

205.238 (c): The producer of an organic livestock operation must not:

(7) Withhold medical treatment from a sick animal in an effort to preserve its organic status. All appropriate medications must be used to restore an animal to health when methods acceptable to organic production fail. Livestock treated with a prohibited substance must be clearly identified and shall not be sold, labeled, or represented as organically produced. Animals seen on inspection to be chronically ill as evidenced by obvious ocular damage, lameness, ill-thrift, poor body condition, poor coat condition, feather damage and loss, large abscesses and other visually objectionable conditions are grounds for major non-compliance and must be corrected by the next inspection. Individual animal health records in auditable format where appropriate quantities can be verified upon inspection and to ascertain whether all appropriate medications were used.

Producers will need time to correct situations and minor non-compliances should be issued. Items noted for 205.238(c)(7) should trigger a major non-compliance,. Producers shall be re-inspected within 6 months time (to allow for affects of ration change, seasonal change, ordering of bedding, etc.).

Farms with filthy, lame and skinny animals should receive a major non-compliance by an ACA.

Motion to Post for Discussion: Hue Karreman, Second: Rigo Delgado

Committee Vote:

Yes – 7

No – 0

Absent – 0

Abstain – 0