Cull Dairy Cow Expert Consultation: Consensus Statement

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This document was prepared by the National Farmed Animal Health and Welfare Council. The Council was formed in 2010 to advise governments and all other stakeholders in animal agriculture on matters of the health and welfare of farmed animals in Canada. The Council is funded jointly by non-government organizations with an interest in animal agriculture and federal, provincial and territorial governments. Council members are designated by their constituency because of broad expertise in animal health and welfare, public health and an interest in approaching topics and developing advice in the context of One Health.

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“Cull” animals, especially in the dairy, beef, swine and egg sectors, are recognized as needing special forms of management. As a first step in facilitating a pro-active approach to the management of cull animals, the National Farmed Animal Health and Welfare Council convened an expert consultation on the management of cull dairy cows to provide guidance on future actions, policy and research in the area. The meeting, held on March 23-24, 2016, brought together experts (listed on intro page) from dairy farming, dairy processing, veterinary medicine, animal transportation, animal auctions, slaughter, provincial regulation, federal regulation, and animal welfare science. The expert consultation resulted in a “consensus statement” of key observations and recommendations which are captured in this report. ¹

1. The need for information and analysis. Currently about 40% of dairy cows (roughly 350,000 animals) are removed from dairy herds each year in Canada. Some of these are healthy animals that are culled because of low production, failure to breed or simply to rejuvenate the milking herd, but many are culled because of compromised health. Moreover, because the market for these animals is somewhat specialized, some slaughter plants do not accept them. As a result, animals that may be in compromised health can be transported significant distances from farm to slaughter. In addition, the management of cull dairy cows in Canada varies widely depending on the location. Where the option exists, some producers ship their cows directly to a nearby slaughter plant and the animals are slaughtered promptly. More often, cows are sent to a livestock auction from where they may be shipped to a plant, possibly some distance away, or bought by dealers who may re-sell them one or more times in a process that may involve repeated handling and lengthy transportation. As examples, some cull dairy cows from Newfoundland are slaughtered in Ontario; some cull cows from Quebec have been identified in British Columbia; and cows from several provinces are commonly slaughtered in the United States. Experts considered that the time from farm to slaughter could be as much as 7-10 days in some cases.

The consensus of the meeting was that research/investigation is needed, using the various available sources of information, to better characterize cull cow management and movement from farm to slaughter, and the factors that lead to long delays before slaughter.

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2. **The need for awareness.** In many cases, producers and herd veterinarians are not aware of the extent of the transport and delay that may occur when they make culling decisions. For example, some may assume that cattle sent to a livestock auction will have relatively little delay until slaughter, whereas the reality may be very different.

The consensus was that communication is needed to make producers and herd veterinarians aware of the potential for long travel distances and delays so that this information can be taken into account when culling decisions are made.

3. **Pro-active culling.** In many cases, pro-active culling can prevent cattle from developing significant health and welfare problems such as emaciation and serious lameness that reduce animal welfare and the commercial value of the animal. This might be promoted by providing training materials to both producers and herd veterinarians, by including the herd veterinarian in culling decisions, and by promoting greater recognition among producers that they are producing a valuable meat product as well as milk and hence that cattle should be shipped before losing their value for slaughter.

The consensus was that training materials on the benefits of early culling decisions should be developed and provided to producers and veterinarians, that early culling criteria should be part of every herd health program, and that producers should consider including the herd veterinarian in culling decisions, so that pro-active culling of non-compromised animals becomes the norm.

4. **Animal condition.** Cows that are culled for health reasons vary widely in their condition, with varying degrees of lameness, mastitis, metritis, displaced abomasum, pneumonia and emaciation. The condition of the animal, together with the potential delays to slaughter, need to be considered when culling decisions are made. Compromised cows can quickly deteriorate when exposed to transport conditions. As examples, a cow that is “off feed” may have a displaced abomasum that will cause significant threat to animal welfare if many days elapse before slaughter, and cows may develop mastitis if they are not dried off before long-duration handling and transportation. Each animal’s fitness for the longest potential journey should be assessed before the animal is loaded.

The consensus was (1) that a decision-tree, which includes both the animal’s condition and the potential delay to slaughter, needs to be made available across the country, (2) that the herd veterinarian play an active role in guiding producers on determining fitness for transport, and (3) that personnel involved in transport and auctions need to be trained to recognize and handle compromised cattle, including awareness of appropriate criteria for deciding to load animals for the potential journey.
5. **Opportunities for local slaughter.** Some long distances and lengthy delays occur because of a lack of opportunities for local slaughter, either because plants are not available or will not accept cull dairy cows.

*The consensus was that efforts must be made to identify more local options for the slaughter of cull dairy cows, perhaps through agreements between producer organizations and slaughter plants, to make short transport distances and timely slaughter the norm for all cull cows, with priority given to those that are at high risk of animal welfare problems.*

6. **Options for management of compromised animals.** Provincial legislation creates different management options to protect the welfare of cull dairy cows.

- A “direct to slaughter” designation is available in Ontario. This involves a compromised animal that is received at an auction and tagged by a provincially appointed veterinarian to proceed directly to a nearby slaughter plant and not go through the normal marketing process that may delay slaughter and pose a risk to welfare.
- On-farm emergency slaughter can be performed in some provinces. In this case, the animal receives ante-mortem veterinary inspection on the farm, is then killed and bled on the farm, and is transported to a slaughter plant for post-mortem inspection and (if appropriate) entering the food system.
- Mobile slaughter is a potential option, especially in Alberta. This allows the entire slaughter process to occur without transporting the animal, and (pending suitable inspection) possibly enter the food system.

The different options have potential advantages and disadvantages in terms of animal welfare, food safety and economics.

*The consensus was that the various options need to be investigated thoroughly so that they can be considered for possible adoption in all provinces and jurisdictions.*

7. **Euthanasia.** In some cases, on-farm euthanasia is the only acceptable option as the animal cannot be shipped and would suffer if kept alive for other options such as on-farm emergency slaughter. Producers need to have training in making decisions about euthanasia, plus either suitable training and tools to perform euthanasia or ready access to euthanasia services including carcass disposal. Veterinarians need suitable training so that they can support effective and humane on-farm practices.

*The consensus was that all dairy farms and auctions should have the training and tools needed for prompt, effective euthanasia, or access to euthanasia services, and that a euthanasia protocol should be part of every herd health program.*
8. Enforcement. Consistent enforcement of the relevant regulations could help to address animal welfare problems and create public confidence. In contrast, inconsistent enforcement could lead to animal welfare problems if it creates an incentive for compromised animals to be sent to locations where inspection is less frequent or less rigorous. Moreover, enforcement can be complicated if the animal changes ownership repeatedly between farm and slaughter so that different people are involved in judging fitness to travel. At present, enforcement related to the management of cull dairy cows involves a number of agencies and is handled in somewhat different ways in different provinces.

- Throughout Canada the CFIA is responsible for enforcing the federal regulations governing the humane transportation of animals, made under the Health of Animals Act. To this end, CFIA staff are present at slaughter plants, and periodically at auctions, assembly yards and other locations, to determine compliance with the regulations.
- Provincial officials are responsible for various provincial regulations depending on the province. Frequency of inspection varies among provinces. In Ontario, for example, the Livestock Community Sales Act requires that provincially appointed inspectors are present at auction markets on any day that auction is being conducted, whereas inspection is periodic or complaint-based in some provinces.
- In some provinces, SPCA inspectors enforce animal welfare/cruelty laws and may attend auction or assembly yards, typically on a complaint basis.
- In some provinces, provincial inspectors are authorized to monitor compliance with the federal Health of Animals Regulations Part XII Transportation of Animals, in order to achieve more efficient inspection and sharing of information between federal and provincial authorities.
- In some provinces, producer organizations are formally involved in certain corrective actions; for example, Dairy Farmers of Ontario does follow-up with producers who are found to have shipped compromised animals.

The consensus was that the different models of enforcement should be examined with a view to recommending the widespread and harmonized adoption of practices deemed best for the protection of animal welfare, and that enforcement authorities consider a memorandum of understanding to facilitate inter-jurisdictional sharing of information related to non-compliance.

9. Age verification for shipment to the US. In addition to the normal handling of cattle at auction yards, cows intended for shipment to the US are subjected to additional handling through a chute to verify that they were born on or after March 1, 1999. The additional handling imposes increased risk of stress and injury. The probability of a dairy cow being aged more than 17 years is negligible.

The consensus was that federal authorities should negotiate with their US counterparts to allow other means of age verification, for example from health records, and to negotiate a date when additional age verification can be discontinued.