



P.O. Box 150 Watkins Glen, NY 14891 607-583-2225
P.O. Box 1065 Orland, CA 95963 530-865-4617

November 9, 2005

Honorable Mike Johanns, Secretary
United States Department of Agriculture
Rm 200-A, Whitten Federal Building
12th and Jefferson Dr., SW
Washington, DC 20250

RE: Strategies for Managing Avian Influenza

Dear Secretary Johanns:

Last week the White House and the Department of Health and Human Services released plans to address the US response to the threat posed by high pathogenic avian influenza (“bird flu”). These plans focus primarily on the prevention and treatment of a potential flu pandemic in the human population.

We have not been able to locate any plans from the US Department of Agriculture for the management of high pathogenic avian influenza in US bird populations. As the largest non-profit organization dedicated to the rescue and protection of farmed animals in the US, Farm Sanctuary is concerned that the USDA has not developed a strategy to prevent introduction of the disease to this country, or to minimize the need for mass killing of birds should the disease be detected here.

Farm Sanctuary would appreciate answers to the following questions regarding the USDA’s strategy for managing a potential outbreak of high pathogenic avian influenza in the US:

1. The risk of introducing avian influenza to the US can be minimized by changes to current policy, including a ban on the importation of all live birds, wild or domestic. What steps are being taken to reduce the risk of introduction of the disease?
2. The risk of spread of avian influenza can be minimized by policy changes, including the closing of live animal markets and restrictions on the transportation

- and commercial shipment of wild and domestic birds. What plans are being made to reduce the risk of transmission of the disease within the US?
3. The World Organization for Animal Health (OIE) and animal welfare scientists have suggested that vaccination may play an effective role in managing avian influenza outbreaks and help to reduce the number of birds killed. Does the USDA intend to make use of bird vaccinations and, if so, under what conditions?
 4. Last spring the OIE, to which the US belongs, adopted guidelines for the humane killing of animals for disease control purposes. Is the USDA committed to complying with these standards in the event of future bird depopulation programs for disease control?

As you are aware, the USDA has conducted relatively large bird depopulation programs in recent years to control outbreaks of low pathogenic avian influenza and exotic Newcastle disease. During these programs animal advocates were informed that the USDA-Veterinary Services follows the guidelines of the American Veterinary Medical Association (AVMA) and uses only AVMA-accepted killing methods. Since that time, however, the OIE has adopted guidelines for the humane killing of animals for disease control. The AVMA and OIE guidelines differ in several regards (refer to attached table). The AVMA guidelines are outdated and based on limited scientific evidence, and in addition, the AVMA guidelines list as "acceptable" or "conditionally acceptable" methods considered inhumane, such as the use of cervical dislocation in conscious birds.

During previous USDA bird depopulation programs animal protection organizations received reports from veterinarians, producers and the public, expressing concerns regarding the humaneness of the methods used. Witnesses to the killing reported birds being bludgeoned to death with bats and ax handles, suffocated with vehicle exhaust or suffering a prolonged death from untrained personnel attempting cervical dislocation or decapitation. During gassing procedures, gas was sometimes pumped directly on birds, causing painful burning, and the gassing compartments were not adequately sealed and gas flow rate inadequately controlled, resulting in a prolonged time to loss of consciousness.

When mass killing of animals is undertaken for disease control purposes, speed of killing is usually the priority, with little consideration given to the humaneness of the process. Killing sentient beings by methods that cause pain and distress is never acceptable, even when carried out on a broad scale to protect public health. Moreover, the slaughter of large numbers of animals can be considered unethical, especially when human health implications are questionable and preventative measures, such as those mentioned above, have not been taken.

Secretary M. Johanns: "Bird Flu"
Page 3 of 3

Therefore, Farm Sanctuary asks that the USDA develop a detailed plan to address strategies for managing avian influenza in US bird populations, including strategies for preventing the introduction and spread of the disease and strategies for minimizing the number of birds that must be killed in order to control an outbreak. We also request the USDA develop a written policy for bird depopulation consistent with the globally recognized standards for humane killing for disease control adopted by the OIE. In addition, we ask that such a plan be released to the public during the drafting stage for comment.

Farm Sanctuary would be happy to meet with members of your staff to discuss this very important matter. Thank you for your attention, and please contact me at 607-583-2225 if I may answer any questions or provide further information.

Sincerely,

Gene Bauston
President, Farm Sanctuary

cc: Ron DeHaven, DVM, Administrator, USDA-APHIS
John Clifford, DVM, Deputy Administrator, USDA-Veterinary Services

Attachment

Euthanasia Methods for Poultry:

Comparison of AVMA and OIE Guidelines

<u>Method</u>	<u>AVMA*</u>	<u>OIE**</u>
Barbiturate Injection	Acceptable	Acceptable
Captive Bolt – Non-Penetrating	Not Acceptable	Acceptable (Adults Only)
Carbon Dioxide/Air Mixture	Acceptable	Acceptable
Carbon Monoxide Gas	Acceptable	Not Acceptable
Cervical Dislocation	Conditionally Acceptable	Not Acceptable in Conscious Poultry
Decapitation	Conditionally Acceptable	Not Acceptable in Conscious Poultry
Electrical	Conditionally Acceptable	Acceptable (Adults Only)
Nitrogen &/or Argon Gas	Conditionally Acceptable	Acceptable
Thoracic Compression	Conditionally Acceptable for Free-Range Birds	Not Acceptable

* American Veterinary Medical Association, 2000 Report of the AVMA Panel on Euthanasia.

** World Organization for Animal Health, Guidelines for the Killing of Animals for Disease Control Purposes, May 2005. (Note: OIE guidelines do not make use of the terms “Acceptable” and “Not Acceptable.”)