

April 11, 2018

## **Subject**

The Vermont Livestock Care Standards Advisory Council (Council) is pleased to provide feedback to the Legislature and to the Secretary of Agriculture, at the request of the House and Senate Committees on Agriculture, on H.310, Agriculture; crimes; livestock; adequate shelter. H.310 proposes to define adequate natural shelter, adequate constructed shelter, and adequate ventilation for the management of livestock animals. In addition, the bill would require livestock animals confined in enclosed areas to be provided adequate exercise, and if on a leash, rope, or chain to be affixed in a manner that prevents the livestock animal from becoming entangled or injured while allowing the livestock animal access to adequate shelter, adequate food, and adequate water.

## **Background**

While H.310 is an improvement over previous analogous bills, its overall ability to ensure livestock well-being is limited due to its focus on indirect measures of animal well-being (resource-based and management-based) rather than direct welfare measures (animal-based). The Council recommends the use of animal-based direct measures in legislation dictating animal well-being standards because “Animal-based measures reflect the outcome of resource inputs and management practices so they provide an integrative and direct measurement of the welfare state of animals.”<sup>i</sup>

Animal-based measures of well-being include parameters such as body condition score; fleece/haircoat cleanliness; lameness; and behavior. These parameters provide the evaluator with information needed to gauge “how an animal is coping with the conditions in which it lives”, which is the definition of animal welfare provided in the Terrestrial Code of the World Organisation for Animal Health.<sup>ii</sup> Although H.310 defines resource-based measures (adequate shelter, food and ventilation) and management-based measures (required turn-out and tethering restrictions), H.310 inadequately relates these measures to the direct measures that an evaluator should use to gauge livestock well-being.

## **Recommendation**

At a minimum, any indirect measures referenced in H.310 should be clearly linked to direct animal-based measures and preferably to species-specific measurable outcomes, thereby de-emphasizing indirect measures. State legislation that utilizes animal-based direct measures for evaluation of livestock well-being allows humane officers to apply consistent species-specific standards in every context, regardless of the season, terrain or management style pertinent to the situation the officer is evaluating.

## **Rationale**

The Vermont Legislature has demonstrated support for national livestock well-being programs, including FARM™ (National Milk Producers’ Federation - <http://www.nationaldairyfarm.com/about-farm>) and Animal Welfare Approved™ (AGW - <https://animalwelfareapproved.us/>), all of which incorporate direct animal-based measures into their standards. It is important that livestock well-being laws enacted in Vermont comport with measures that allow for evaluation to maintain transparency and accountability for producers, humane officers and the public. The use of direct animal-based outcome measures ensures consistent usability of statutory mandates in all circumstances encountered across the State.

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<sup>i</sup> Munoz C, Campbell A, Hemsworth P, Doyle R. 2018. Animal-Based Measures to Assess the Welfare of Extensively Managed Ewes. *Animals: An Open Access Journal from MDPI*, 8(1), 2. <http://doi.org/10.3390/ani8010002>

<sup>ii</sup> Anonymous. 2017. Introduction to the Recommendations for Animal Welfare, Chapter 7.1 Terrestrial Animal Health Code. World Organisation for Animal Health.  
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