



*Canadians for
Ethical Treatment of Food Animals*

**SUBMISSION ON THE
REVISED DRAFT DAIRY CODE OF PRACTICE
FEBURARY 9, 2009**

Introduction

CETFA applauds the National Farm Animal Care Council, the Dairy Farmers of Canada and all partner organizations involved in developing the revisions to the Recommended Codes of Practice for Dairy Cattle. We find the revisions progressive and responsive to current research findings and are pleased to see that the many facets of cattle welfare including physical, physiological and psychological needs have been considered.

While we are pleased with the draft we do have some recommendations for further ensuring best practices for these animals, which we hope you will consider. Our recommendations are based on investigations across Canada, the US and Europe. These experiences have given us a view of current practices on farms, during loading and unloading, on transport, at livestock auctions and in slaughterhouses.

Our recommendations are in **bold** text. Thank you.

1. Accommodation, Housing and Handling Facilities

1.1.1 Unweaned Calves

RECOMMENDATION

Housing must allow calves to easily stand up, lie down, turn around, adopt normal resting postures, have visual **and physical** contact with other calves.

1.1.2 Heifers, Milking Cows and Dry Cows

RECOMMENDATION

Tie-stalls must be phased out.

3. Health and Welfare Management

3.7 Lameness

RECOMMENDATION

Lame cows must be diagnosed and treated early.

All cows must have their hooves trimmed twice/year.

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3.8 Mastitis

RECOMMENDATION

Mastitis must be diagnosed and treated early.

Blocked or infected teats must never be cut off.

Cows with chronic recurring mastitis that impedes walking must be euthanized on-farm and never transported to a livestock auction. Acceptable methods of euthanization of adult cows include and are limited to:

- **free bullet (.22 long rifle)**
- **penetrating captive bolt followed by bleeding; or**
- **injection with barbiturates and other drugs (administered by a licensed vet)**

3.11 Sick, Injured, And Cull Animals

RECOMMENDATION

Approved methods of euthanasia include and are limited to:

- **free bullet (.22 caliber for calves, .22 long rifle for cows, high-powered rifle for bulls)**
- **penetrating captive bolt followed by bleeding; or**
- **injection with barbiturates and other drugs (administered by a licensed vet)**

The insertion of a knife into a cow's vagina to cut open the uterus for internal bleed-out is not a humane form of euthanasia and is never to be used.

4. Husbandry Practices

4.1 Handling, Moving, Restraining, and Treating Animals

RECOMMENDATION

Electric cattle prods must never be used on cows or calves.

4.2 Disbudding and Dehorning

RECOMMENDATION

Sedatives, local anesthetics and analgesics must be provided for all dehorning or disbudding.

The use of polled breeds should be phased in.

4.3 Identification and Branding

RECOMMENDATION

Sedatives, local anesthetics and analgesics must be provided for all branding.

4.4 Castration

RECOMMENDATION

Sedatives, local anesthetic and analgesics must be provided for castration.

4.4 Tail Docking

RECOMMENDATION

Dairy cattle must not be tail docked.

4.5 Teat Removal

RECOMMENDATION

Only supernumerary teats may be removed. Blocked, diseased or injured teats must not be removed for the purpose of milking.

4.9 Hoof Trimming

RECOMMENDATION

Hooves must be trimmed twice annually.

5.0 Transportation

5.1.1 Fitness for Transport

RECOMMENDATION

Non-ambulatory animals must never be transported. They must be humanely euthanized where they lie. Acceptable methods of euthanization include and are limited to:

- **free bullet (.22 caliber for calves, .22 long rifle for cows, high-powered rifle for bulls)**
- **penetrating captive bolt followed by bleeding; or**
- **injection with barbiturates and other drugs (administered by a licensed vet)**

Unfit animals with the following general conditions must never be transported, except for veterinary treatment (means of loading must be approved by the receiving veterinarian): fractured limbs; fractures to the pelvis; total blindness (due to a reversible condition such as pink eye); large, deep wounds; severe bleeding; severely compromised general condition such as emaciation; animals that have given birth in the preceding 48 hours; uterine prolapse; hernia that impedes movement, is painful on palpation, touches the ground or has an open skin wound, ulceration or obvious infection; and severe chronic pain that would be aggravated by transportation.

5.1.2 Preparing Cattle for Transport

RECOMMENDATION

Lactating cows must be milked out immediately before being transported.

Lactating cows must be dried off before shipment to auction. If this is not feasible, still-lactating cows must be milked before loading onto the truck and taken directly to slaughter.

Calves must not be transported to auction markets until seven days of age.

5.2 Loading and Receiving

RECOMMENDATION

Electric prods must never be used in the loading and/or unloading of cows and calves.

6. Euthanasia

6.1 On-Farm Euthanasia

RECOMMENDATION

Cattle with untreatable conditions, not responding to treatment, or not fit for transport must be euthanized promptly. Acceptable methods of euthanization include and are limited to:

- **free bullet (.22 caliber for calves, .22 long rifle for cows, high-powered rifle for bulls)**
- **penetrating captive bolt followed by bleeding; or**
- **injection with barbiturates and other drugs (administered by a licensed vet)**

6.2 Methods

RECOMMENDATION

The method to kill cattle must only be of the three following methods:

- **free bullet (.22 caliber for calves, .22 long rifle for cows, high-powered rifle for bulls)**
- **penetrating captive bolt followed by bleeding; or**
- **injection with barbiturates and other drugs (administered by a licensed vet)**

6.3 Evidence of Death

RECOMMENDATION

Death must be confirmed by a lack of corneal reflex.