



**DOSO**

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**Vedr.: Høring over kapitler vedr. dyrevelfærd til OIA's Terrestrial Animal Health Code**

DOSO recognise OIE's efforts to introduce animal welfare round the world. In that spirit we point out that the choice of words and definitions in OIE's Terrestrial Animal Health code and other writings may counteract OIE's efforts by creating associations about animals as things. We find it proved that a careful use of language might ease the introduction of animal welfare all over the world by creating associations about animals as living creatures and by focusing on the single individual.

Chapter 7.1

Art. 7.1.2

5) *That the use of animals in agriculture, education and research, and for companionship, recreation and entertainment, makes a major contribution to the wellbeing of people.*

Comment: '*makes a major contribution to the wellbeing of people*' should be erased as that sentence provides unwarranted legitimacy to all sorts of behaviour against animals that can easily be disputed – and should be.

8) *That equivalent outcomes based on performance criteria, rather than identical systems based on*

Comment: Unclear text.

Chapter 7.8

Art. 7.8.10.

Transportation

'There may be a justifiable reason to transport animals whose welfare is compromised as a consequence of scientific procedures which the animals are under-going or for which they are intended. In such cases, every precaution should be taken to avoid further stress.'

Comment: Should read: '*animals whose welfare is compromised as a consequence of scientific procedures which the animals are under-going or for which they are intended should only undergo transport in order to receive curative, therapeutic treatment*'.

'*Justifiable reasons*' to transport injured animals may result in a lot of stress and pain due to efforts to reduce the number of animals involved/used and not enough consideration for the individual animal.



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Chapter 7.9.

Art. 7.9.5.

i) Cattle that are kept tethered should, as a minimum, be able to lie down, and if tethered outdoors, turn around and walk.

Comment: Cattle should never be kept tethered

Draft Chapter 7.x.  
Animal welfare and  
**Broiler chicken production systems**

Art. 7.x.1.

Definitions:

'Harvesting' should not be used to describe a procedure related to live animals.' 'Catching and loading' of birds should be called exactly that.

Animal welfare is about live animals and about recognition of the individual animal and its needs.

The use of the word 'harvesting' is denigrating and disrespectful as it signals a perception of the birds ('broilers') as things rather than living creatures.

Such a perception is less that useful in the attempt to enhance animal welfare.

Art. 2.x.3.

1. Also the mortality rate within expected ranges could reflect animal welfare problems.
2. Broilers are not susceptible to a variety of infections and non-infectious musculoskeletal disorders. Birds raised for meat are inflicted with a number of disorders through breeding and through living conditions. In other words, those disorders can be dealt with from this moment. Scientific evidence in abundance is available.

Art. 7.x.4.

q) Define 'excessive' feed withdrawal.

Animal handlers should be given instructions in handling and animal welfare.

Catching of birds for transport to slaughter should be done in a way to allow the handlers to observe and discover injured birds.

Draft chapter 7.x.  
**Animal welfare and dairy cattle**  
Production systems

2. Recommendation on stockman ship and animal management

g) Only a trained veterinarian should perform embryo transfer and the animal should be under epidural or other anaesthesia.



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m) ii) Tail docking.

Tail docking should be strongly discouraged as the tail is of major importance to the welfare of the animal. The tail can gently be held aside while milking and will not represent a hygiene hazard.

Med venlig hilsen

**DOSO**

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