



September 2, 2015

Dr. John Clifford
Deputy Administrator, Veterinary Services
Animal and Plant Health Inspection Service
U.S. Department of Agriculture
1400 Independence Ave SW
Washington, DC 20250

RE: Ventilation shutdown as suggested poultry kill method in the event of a reoccurrence of avian influenza

Dear Dr. Clifford,

Compassion in World Farming is concerned to learn that it has been suggested to the USDA to use ventilation shutdown as a method for killing poultry in the event of a recurrence in the fall of the highly pathogenic avian influenza virus.

Ventilation shutdown is not a method permitted by the OIE standards on killing for disease control purposes. Indeed, ventilation shutdown appears to breach the requirement in the OIE standards on killing for disease control that where "loss of consciousness is not immediate, induction of unconsciousness should be non-aversive or the least aversive possible and should not cause avoidable anxiety, pain, distress or suffering". It is important for the U.S. to respect international standards to which it has agreed. The OIE standards can be found at http://www.oie.int/index.php?id=169&L=0&htmfile=chapitre_aw_killing.htm.

Compassion in World Farming, as the leading global farm animal welfare charity, is also firmly opposed to ventilation shutdown. It would cause substantial suffering and distress to birds and does not guarantee rapid unconsciousness. Ventilation shutdown is not an acceptable killing method; death could be slow and protracted, with the birds suffering over an extended period of time.

Ventilation shutdown involves switching off the automated ventilation system, or sealing off the natural ventilation of poultry housing. The intended consequence is that, without ventilation, the temperature in the house should rise such that the birds are killed as a result of hyperthermia causing organ failure. Heat may need to be introduced into poultry houses to achieve a lethal rise in temperature in certain circumstances.

We strongly urge the USDA not to permit the use of ventilation shutdown as a killing method in the event of a recurrence of avian influenza.

In our view the most appropriate method for emergency killing of poultry for disease control purposes is the anoxia technique. This involves applying >98% Nitrogen, packed in high expansion foam to poultry. Trials show that anoxic foam has the potential to be a reliable and relatively humane method of emergency killing for poultry. We would stress that this method is fundamentally different from low expansion fire fighting foam which in our view is highly aversive and cannot be recommended. .

Harm Kiezebrink, the researcher leading these trials, is based in Germany at [The Friedrich-Loeffler-Institute for Animal Welfare and Animal Husbandry](http://www.fli.de/en/institutes/institut-fuer-tierschutz-und-tierhaltung/) (<http://www.fli.de/en/institutes/institut-fuer-tierschutz-und-tierhaltung/>), a Government research institute and OIE Collaboration Centre in Celle. He is happy to discuss

this issue with you and your team to outline the efficacy, humaneness and human health & safety features of the foam anoxia method. He can be contacted directly at harm.kie@gmail.com.

Thank you for considering these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Leah Garcés". The signature is fluid and cursive, with the first name "Leah" and last name "Garcés" clearly distinguishable.

Leah Garcés
USA Director
Compassion in World Farming
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