



FARM Animal Care Public Comment Period Feedback Response



Notes

- All public comments were reviewed by FARM Farmer Advisory Council, Technical Writing Group, NMPF Animal Health and Well-Being Committee and NMPF Board of Directors
- Comments were summarized into broader categories as outlined
- Any topic commented upon but not directly addressed in the following slide deck, it can be assumed that no change in the standard was made.

Summary of Public Comment



Topic	Producer	Veterinarian	FARM Participant	Other	Total
<i>General</i>	21	3	22	9	55
<i>Antibiotic Stewardship</i>	8	25	11	9	53
<i>Veterinarian Involvement</i>	9	0	16	3	28
<i>Culling and Transportation</i>	3	1	7	4	15
<i>Daily Exercise</i>	3	1	9	7	20
<i>Animal Care Continuing Education</i>	6	0	22	4	32
<i>Facility Management</i>	5	2	9	7	23
<i>Non Ambulatory & Euthanasia</i>	0	0	5	2	7
<i>Animal Observation</i>	3	1	10	3	17
<i>Animal Management</i>	2	0	7	5	14
<i>Pain Management & Calves</i>	14	24	16	9	63
<i>Water Access</i>	6	1	19	2	28
<i>Tail docking</i>	15	0	2	0	17
Total	95	58	155	64	372
Percentage	25.5%	15.6%	41.7%	17.2%	

Antibiotic Stewardship

Producer	Veterinarian	Program Participant	Other
VCPR to be more robust: to be used as opportunity to document CE credentials of veterinarian	VCPR to be more robust: to be used as opportunity to document CE credentials of veterinarian	Residue standards wording to be clarified	VCPR to be more robust: to be used as opportunity to document CE credentials of veterinarian
Residue standards wording to be clarified		Electronic treatment records should be considered acceptable	Pleased with veterinarian oversight and heightened awareness on drug treatment records.
Milk quality/SCC integration		Unnecessary based upon FDA/PMO regulations	Greater accountability needed for antibiotic stewardship initiatives

Antibiotic Stewardship

- Continuing Education for Veterinarian Community
 - **Decisions:**
 - Supportive of introducing the concept in Version 4.0
 - Supportive of highlighting and referencing the available CE programs
 - Remain conscious of not overstepping veterinarian licensing requirements
- Drug Treatment Records
 - **Decisions:**
 - Electronic and written records will be accepted
 - Permanent ID definition:
 - USDA and FDA definitions of permanent ID supported

Veterinarian Involvement

Producer	Veterinarian	Program Participant	Other
Relationship between veterinarian and producer should be valued		VCPR should be inclusive of all areas requiring veterinarian signature and review	VCPR should be inclusive of all areas requiring veterinarian signature and review
		Need further engagement with the veterinarian community	

Veterinarian Involvement

- ***Decisions:***
 - Supportive of comprehensive document to encompass VCPR, Treatment Record review, Herd Health Plan review, etc. so one signature required.
 - Working group establishment of veterinarians to identify further opportunity of engagement of veterinarian community

Culling and Transportation

Producer	Veterinarian	Program Participant	Other
Submitting culling protocols unnecessary	Supportive of written culling protocol	Top 11 Considerations poster should be considered acceptable protocol	Top 11 Considerations poster should be considered acceptable protocol
		Consistency of protocol and training needs	Clarity on training and protocol application to haulers
		Clarity on training and protocol application to haulers	Reduce risk of transportation to slaughter

Culling and Transportation

- ***Decisions:***
 - Acknowledge the intent of a culling protocol was misinterpreted and therefore, culling and transportation protocol changed to:
 - **Fitness to Transport protocol**
 - Assign as a corrective action for consistency between continuing education and protocol expectation
 - Top 11 Poster will satisfy protocol requirement
 - Continuing education to Top 11 Poster will need to be documented for those responsible for animals culled
 - Removed expectation/standard of training and protocol for transportation
 - Supportive BQA Transportation training
 - Packing plants will be requiring those arriving with animals for processing to provide evidence of training

Animal Management & Daily Exercise

Producer	Veterinarian	Program Participant	Other
Clarification on feed management for calves	Definition of daily exercise	Definition of daily exercise; Supportive	Definition of daily exercise; Supportive
Definition of daily exercise		Clarification for feed management of calves	Broader definition of proper movement of calves
		Clarification of maternity area standards and movement	Consideration for different housing types and meeting daily exercise standard

Animal Management & Daily Exercise



- ***Decisions:***

- Standard: All age classes of animals have a method of daily exercise (weather permitting, if outdoors)
 - Animals of all age classes are able to fully turn around or locomote daily.
 - If exercise is provided outdoors, no expectation of daily exercise if weather prohibits.
- No action plan generated for not meeting standard

Continuing Education

Producer	Veterinarian	Program Participant	Other
Stockmanship training is essential but need resources to satisfy requirement		Define who needs to be trained more clearly (i.e. 3 rd party vendors)	Define who needs to be trained more clearly (i.e. 3 rd party vendors)
Define who needs to be trained more clearly		Resources for training must be highlighted for ease of implementation	Resources for training must be highlighted for ease of implementation to ease potential tension
		Exemption consideration for family employees	

Continuing Education

- ***Decisions:***
 - Supportive of training expectation for non-family and family employees
 - Family employees continuing education applies to:
 - Any family member 18 years or older with animal care responsibilities
 - Family unit continuing education acceptable
 - Resources to identify qualifying continuing education will be heavily marketed

Facility Management

Producer	Veterinarian	Program Participant	Other
Protection from heat and cold clarification	Protection from heat and cold clarification	Clarification of facility standards to ensure facility neutrality and proper evaluation	Protection from heat and cold clarification; basic needs
Overcrowding standard desired	Overcrowding standard desired		Clarification of facility standards to ensure facility neutrality
			Biosecurity to be based from SMS resources

Facility Management

- **Decisions:**
 - **Standard:** All age classes of animals are protected from heat and cold for typical climatic conditions.
 - Protection/abatement from heat and cold provided for all age classes
 - Overstocking
 - Non-supportive of any measurement related to overstocking. Continue to rely upon animal based, outcomes based measures

Non-Ambulatory & Euthanasia

Producer	Veterinarian	Program Participant	Other
		Additional resources needed to support producers to execute BMPs	Euthanasia criteria to emphasize reduction of pain and suffering
		Definition of prompt and timely	Greater clarity on proper movement methods of non-ambulatory animals
		Critical welfare issue-should trigger Willful Mistreatment	

Non-Ambulatory & Euthanasia

- Handling of dead animal consideration
 - **Decision:** Heightened focus in Reference Manual regarding appropriate carcass disposal and handling of dead animals

Animal Observations

Producer	Veterinarian	Program Participant	Other
Sampling protocol should be fair across herd sizes	Lameness benchmark is too moderate	Supportive of broken tail observation addition	Greater focus on lameness desired
Competent evaluators are necessary to accurately determine benchmarks		Further clarity sought on other animal observation scoring	Supportive of broken tail observation addition
Broken tails to be properly assessed			

Animal Observations

- ***Decisions:***
 - Revised sampling protocol
 - Reduce the likelihood of bias
 - Ensure herd size neutrality

Pain Management for Disbudding



Producer	Veterinarian	Program Participant	Other
Prioritize veterinarian relationship	Pain management should be standard of practice and mandatory	Pain management should be mandatory requirement	Pain management should be required across industry as standard of care
Define pain mitigation		Pain management not fully embraced by vet and producer community	
Not making mandatory will be a step backwards for industry		Consideration for other painful procedures?	

Pain Management for Disbudding



- Letters of support received from AABP & FDA
- Clarification around if any exemption for different types of methods
 - **Decision:** No exemption regardless of method of disbudding
- **Standard Decision:** Pain management for disbudding required within 3 years of the facilities' evaluation date
 - Continuous Improvement Plan if no pain management used for disbudding

Water Access



Producer	Veterinarian	Program Participant	Other
24/7 Access to water is not realistic	Consideration for what truly should trigger neglect regarding water access	Consideration for what truly should trigger neglect regarding water access	Consistency of expectations/accountability measures across calf standards
Consideration for hydration vs. water access		Define water access	
		Cold weather management of water access	

Water Access

- ***Decisions:***

- **Standard:** All age classes of animals have access to clean water appropriate for climatic conditions.
 - Access defined as offered routinely. In freezing climatic conditions; access is defined as offering appropriate water as outlined in protocol
 - Calves are expected to have water access by day 3