



Veterinary Association for Farm Animal Welfare

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July 28, 2024

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www.VAFAW.org

AVMA Animal Welfare Committee Members
American Veterinary Medical Association
1931 North Meacham Rd., Suite 100
Schaumburg, IL 60173-4360

Re: Comment on AVMA's Policy on Pregnant Sow Housing

Dear Members of the AVMA Animal Welfare Committee,

On behalf of the Veterinary Association for Farm Animal Welfare (VAFAW) and our members, I am pleased to submit comments on the AVMA Pregnant Sow Housing Policy. VAFAW is a nonprofit organization that advocates for animals used in food and fiber production by providing a veterinary perspective grounded in animal welfare and ethics.

VAFAW shares the commitment of the members of the Animal Welfare Committee (AWC) to advancing high standards of animal welfare, informed by scientific research and ethical considerations. The AVMA calls on the Committee to “seek information pertaining to animal welfare from groups internal and external to the AVMA.”¹ AVMA policies are frequently consulted by veterinarians, policymakers, business leaders, and the public and thus have tremendous influence. We greatly appreciate the time and effort committee members devote to the collaborative process of developing and revising them.

As you know, animal welfare science has progressed rapidly in the past decade since the AVMA's policy on pregnant sow housing was last revised, with developments in key areas such as porcine behavior and cognition, the impact of sows' gestation housing on their offspring, practices for protecting welfare in group-housing systems, and precision farming technologies that can mitigate lameness risk when sows are housed in groups. On a global scale, animal welfare standards mandated by laws, regulations, and consumer demand are being enforced and strengthened. In our own country, the Supreme Court upheld the

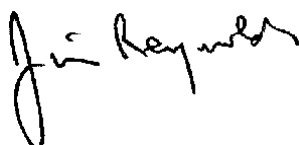
¹ AVMA. (n.d.). Animal Welfare Committee. <https://www.avma.org/about/councils-committees-task-forces-and-trusts/animal-welfare-committee-awc>

constitutionality of state laws banning close confinement housing of sows and gilts, a decision supported by several amicus briefs filed by veterinarians.^{2,3,4} We encourage the AWC to consider these developments as they update the Pregnant Sow Housing Policy and associated references.

VFAFW has developed a position statement on Sow and Gilt Gestation Housing, and we offer it for consideration by the Animal Welfare Committee in updating the AVMA's policy. Our position statement is included below.

Thank you for considering these comments and for your commitment to advancing animal welfare. We would be happy to discuss this feedback further if it is helpful to the committee's deliberations and to serve as a resource on issues in the future. For follow-up, I can be reached at jimrey@pacbell.net.

Sincerely,



Jim Reynolds, DVM, MPVM, DACAW
Board Member, Veterinary Association for Farm Animal Welfare
Lifetime Member, American Veterinary Medical Association
AVMA Animal Welfare Committee (Member 2003–2009; Chair 2009)
Recipient, AVMA Animal Welfare Award, 2007

² Brief of Donald Broom, Elena Contreras, Gwendolen Reyes-Illg, James Reynolds, and 374 Additional Animal-Welfare Scientists and Veterinarians as Amici Curiae in Support of Respondents, National Pork Producers Council, et al. v. Karen Ross, (2022) (No. 21-468). https://www.supremecourt.gov/DocketPDF/21/21-468/233565/20220815174931670_Broom%20et%20al.%20amicus%20brief%20-%20Natl%20Pork%20v.%20Ross%20-%20No.%2021-468.pdf

³ Brief of American Public Health Association, Infectious Diseases Society of America, Center for Food Safety, et al. as Amici Curiae in Support of Respondents, National Pork Producers Council, et al. v. Karen Ross, (2022) (No. 21-468). https://www.supremecourt.gov/DocketPDF/21/21-468/233519/20220815153028184_21-468_Amicus%20Brief.pdf

⁴ Brief of Jim Keen, DVM, PhD and Thomas Pool, MPH, DVM as Amici Curiae in Support of Respondents, National Pork Producers Council, et al. v. Karen Ross, (2022) (No. 21-468). https://www.supremecourt.gov/DocketPDF/21/21-468/233485/20220815135548169_21-468_Amicus%20Brief.pdf



Position Statement

Sow and Gilt Gestation Housing

Based on animal welfare science, the Veterinary Association for Farm Animal Welfare (VAFAW) recognizes that sows and gilts are social and intelligent animals who experience physical harm and psychological distress when denied the opportunity to express species-typical behaviors. Sows and gilts are unable to fully express these behaviors in intensive confinement.

VAFAW supports group housing systems during breeding and gestation that maximize welfare as outlined by the Five Domains Model:

NUTRITION: VAFAW supports housing systems that minimize inter-sow competition to ensure all animals have access to appropriate feed and clean water. We encourage the implementation of management methods to reduce hunger caused by feed restriction, such as the provision of straw and diets that promote satiety.

PHYSICAL ENVIRONMENT: VAFAW supports housing systems that encourage the expression of species-typical environmental engagement, such as exploration, foraging, and rooting; this includes the provision of synchronously accessible enrichment. We encourage outdoor access for all animals to facilitate these natural behaviors. Housing designs should enable sows to divide space into distinct functional zones; this includes opportunities to separate areas of rest



from those established for elimination and opportunities to thermoregulate based on temperature gradients. The housing system must provide environmental conditions that maximize sow comfort and health, including appropriate temperature, air quality, sanitation, and ambient noise levels. Production management must maintain flooring to prevent injury, and provide clean, dry, bedded areas for rest.

HEALTH: VFAFW supports management protocols that promote disease prevention, timely disease detection and treatment, and pain mitigation. Production management must train workers to detect animal pain, disease, and injury and intervene as needed. Designated hospital pens must be provided for animals that require enhanced monitoring or treatment.

BEHAVIORAL INTERACTIONS: VFAFW supports facility designs and management protocols that reduce inter-sow aggression and promote positive social engagement, including appropriate stocking densities, opportunities to escape unwanted interactions, and methods of grouping that mitigate social stress. Production management must provide worker training in stockmanship based on an understanding of sow behavior that ensures appropriate animal handling and movement to minimize fear, distress, and injury.

MENTAL STATE: VFAFW supports housing systems that enhance sow psychological welfare by implementing housing design features and management protocols that mitigate boredom, anxiety, frustration, and stress and promote positive affective states. This includes providing an appropriate quantity and quality of space based on a sow's behavioral needs. VFAFW also emphasizes the importance of agency in enhancing psychological welfare; facilities should provide sows with opportunities for choice through the ability to regulate social engagement and seek enrichment and physical comfort.

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The Veterinary Association for Farm Animal Welfare (VFAFW) is a non-profit organization and has filed for 501c(3) status. VFAFW advocates for animals used in food and fiber production by using a veterinary perspective grounded in animal welfare and ethics.

For more information, visit www.VFAFW.org or email info@VFAFW.org.