



Animal Welfare Review Dairy Audit Standards

Validus audits are based on science, industry standards and best management practices. The objectives of the audit program are to (1) conduct an independent, third-party verification of on-farm animal welfare practices and (2) show continual improvement of animal care practices on-farm. The auditor conducts a comprehensive walk-through of the operation including both animal and personnel observation. Personnel may be interviewed as to their daily animal care duties, responsibilities, and training. This audit addresses the management, employees, and animals at the physical location of the dairy based on the premise identification. All structures and facilities that house animals on the premises will be observed as part of the audit process. As the auditor moves through the dairy, the management team will be expected to provide information regarding the biosecurity or flow of the operation. Validus auditors will follow the plan identified by the producer regarding biosecurity of the operation (Example: youngest to oldest).

The audit will consist of the following:

- Entrance Interview – Review of expectations and interview with farm manager
- Document Review – Review of records, standard operating procedures
- Caretaker Observations and Interviews – Individual or group interviews to verify standard operating procedures. Employees could be interviewed and/or observed in the areas of: animal handling, processing, euthanasia and/or transport (demonstration/describe process). Minimum of at least 1 random observation of each event occurring during the audit. If an issue is suspected, the auditor will expand their caretaker observations and interviews.
- Facility Observations – Observe facilities for benchmarks
- Animal Observations – Observe animals for benchmarks
- Exit Interview – Discuss observations with the manager (or management representatives) that will be included in the audit report

The number of animals to be observed will be based on a statistical sampling process to ensure that areas are evaluated thoroughly and accurately. Animals are observed in key risk groups (pre-weaned calves, heifers, dry cows, lactating cows). Throughout the audit, any animal identified with an issue outside of the sample observation (i.e., any physical issue attribute that is causing a detriment to the animal's health) will be noted as an out-of-scope observation (an animal not part of the random animal observation process). The out-of-scope observations will not be calculated as part of the benchmark percentage, but all observations will be discussed at the exit interview and will be included in the audit report notes.

With the focus of this audit being on improving the welfare of the animals on the dairy, an increased emphasis has been placed on this aspect. Points on animal welfare criteria have been doubled on the audit tool, therefore placing a larger emphasis on animal welfare criteria. (Refer to Page 12 for examples)

As the program has continued to grow and with achieving additional third-party certifications, Validus auditors will be observing/discussing additional areas. Some of those areas include: using professional advice when building or remodeling existing facilities regarding animal health and well-being, focus on the type of lighting to be used so that animals are not discomforted. Also observe the type of equipment that is used within the facility to maintain and minimize noise.

Animal breeding, welfare and health concerns should be a part of the genetic selection. Genetic selection may include selecting animals that are best suited for the region and area where the dairy is located. The dairy should review historical information on the breeding background of the cattle purchased and bred at the facility to make sure that traits are selected that are best suited for the region.

Examples include but are not limited to: avoiding any potential health and disease issue, calving ease, temperament, body confirmation, and any other desired traits. Mixing horned and non-horned animals should not occur at the facility. Considerations by the producer need to be made regarding the age and stage of the animals so that they can be grouped together within their hierarchies. Aggressive animals (express excessive agnostic behavior) need to be observed and managed to avoid animal and employee injury. If aggressive cattle are identified, then employees need to be trained to respond to the situations and remove animals from these pens, if needed.

Contractors or employees working in the breeding program on the dairy, should be properly trained to be able to complete the task without causing distress or harm to the animals. The selected individuals should understand the dairy's animal welfare policy and have signed off on this document. If embryo transfer or *in vitro* fertilization occurs on the dairy, it should be completed by a veterinarian or a trained competent individual.

Willful Acts of Abuse or Neglect

Willful acts of abuse and neglect will result in an automatic failure of the audit. The audit will continue, but egregious Acts and Critical Failures (as highlighted in red throughout the standards) must be stopped immediately. A corrective action plan must be submitted within 24 hours of the audit. A verification audit will be completed within 30-60 days of the audit date. Listed below are willful acts of abuse and/or neglect.

- Intentionally applying prods to sensitive parts of the animal such as eyes, ears, nose, genitals or rectum
- Malicious hitting/beating of an animal. This includes forcefully striking an animal with closed fist, foot, handling equipment (sorting board, rattle paddle, etc.) or other hard/solid objects that can cause pain, bruising or injury.
- Moving animals to cause them to fall
- Dragging of conscious animals by any part of their body except in the rare case where a non-ambulatory animal must be moved from a life-threatening situation
- Purposefully dropping or throwing animals
- Failure to provide food, water and care that results in significant harm or death to animals

Critical Non-conformances (Failure items if not met):

- Care is provided to non-ambulatory animals (including pain management, pest control, protection from predators, protection from weather) similar to that provided to other animals requiring hospitalization (Critical issue regarding the ability to provide adequate feed and water in a daily manner and has access to shelter)
- Non-Ambulatory animals are given adequate feed and water daily in a manner that encourages consumption (animals must be able to reach feed/water provided)
- Animals in extreme distress (the situation is determined to be irreversible) are euthanized in a timely manner (no longer than 4 hours from making the decision to euthanize)
- Protocol for terminally sick or severely injured (and not treatable) calves includes being euthanized in a timely manner (no longer than 4 hours)
- Animals identified as severely lame (4 or 5) in the general population by the auditor
- Tail docking is prohibited from being practiced on the dairy or on owned or purchased replacements
- Animals in confinement longer than 2 hours (except in the parlor holding area) have access to water
- Heifer calves receive at least 4 quarts or 10% of body weight of colostrum or equivalent colostrum replacer within 12 hours of birth
- Bull calves either receive at least 4 quarts or 10% of body weight of colostrum or equivalent colostrum replacer within 12 hours of birth or are humanely euthanized at birth
- Calves have access to feed (solid feed at day 3) and water (day 1)
- Electric prods are not used to drive calves

Major Non-conformances:

Issues that directly affect animal well-being (Examples- Animal observations, employee observations, body condition, locomotion, leg lesions, etc.). Items identified with an asterisk are major non-conformances. These items must be addressed within 10 days of the audit report. A verification audit/desk audit will be performed within 30-60 days of receiving the corrective action plan.

Minor Non-conformances:

Issues that have an indirect effect on animal well-being (Examples- Standard operating procedures, records, documentation, etc.). These items must be addressed within 30 days of the audit report. These items will be verified at the time of the next audit.

Validus Audit Standards

1. MANAGEMENT

- a. Facility has a written animal welfare policy
 - 1. Policy includes a zero tolerance of willful abuse and neglect
 - 2. Policy includes directive that any occurrence of willful abuse or neglect must be reported immediately to their respective supervisor, or hotline number is applicable for reporting observed abuse/neglect
 - 3. Caretakers have been trained to policy and are aware of consequences
 - 4. Records verify caretakers have signed and dated statements, prior to the start of work, that they will refrain from willful and intentional abuse and report any observed abuse
 - 5. Caretakers are aware of consequences for willful and intentional animal abuse.
 - 6. Policy is posted in worker's native language in a prominent location (break room, locker room, lunchroom, etc.) to be continually visible for all animal caretakers or handlers to view
 - 7. Policy is reviewed at least annually by all caretakers
 - 8. There is a documented record of the animal welfare policy/Cow Care Agreement signed and dated by the caretaker(s) prior to start of work at the respective site.
 - 9. Management has a written protocol/process for how to respond to a documented case of animal abuse and a protection process to protect those who report any abuse.
- b. Written training records verify caretaker (**employee or family member**) training, including date of training, training topic, trainer and signature of trainee
 - 1. Animal handling procedures
 - a. Process to follow when introducing newly delivered animals into the dairy
 - 2. Milking techniques
 - 3. Calf care
 - 4. Hospital area management (applicable caretakers)
 - 5. Non-ambulatory animal management
 - 6. Euthanasia program (applicable caretakers)
 - a. If a contracted service (renderer) is hired and conducts euthanasia on the dairy, there must be documentation to show that the individuals have been trained on proper euthanasia techniques. Records are to be provided to the dairy.
 - 7. Emergency procedures
- c. Annual training for all animal caretakers includes animal welfare
- d. Farm protocols and SOP's are accessible and written in a language that employees understand
- e. Farm has a Permanent animal identification plan in place to be able to track animals
- f. Farm has a written farm plan consisting of standard operating procedures for emergencies, facilities repair, and maintenance.
- g. Farm has a written Emergency Contact Sheet that is posted and readily accessible by employees, including:
 - 1. Key farm contact names
 - 2. Local emergency personnel
 - 3. Herd veterinarian
 - 4. Farm location and directions (full address of the property or 911 addresses)
 - 5. Map of the facility

- h. Farm has a written Emergency Action Plan and employees are trained
 - 1. Plan needs to include the following: major weather events for the area (examples include: tornado, blizzard, hurricane, extreme heat, etc.),
 - 2. Fire
 - 3. Power outage
 - 4. Catastrophic mortality loss
 - 5. Emergency Warning systems and generators are tested and recorded monthly
- i. Farm has an emergency action system for confined housing (cross ventilated and tunnel ventilated)
- j. Internal checks (audits) are completed at the dairy regarding animal observations (body conditioning, hygiene, and locomotion scores) on an annual basis

2. HEALTH

- a. Farm has a written, current herd health plan consisting of standard operating procedures including, but not limited to, biosecurity, nutrition, non-ambulatory animal management, euthanasia, culling and transportation, daily observation, newborn and milk-fed dairy calf management, vaccinations, diseased and injured animal management, treatment of common diseases, parasite, pest, and fly control (and implemented), lameness prevention, pain management, maternity cow management, needle tracking (appropriate use and disposal, protocol for actions if needle breaks off into animal, etc.) and a milking process/routine.
- b. The herd health plan is reviewed regularly (minimum of annually) by management and the herd veterinarian for effectiveness of treatment protocols and herd morbidity issues (records reviewed may include hospital, calving, fresh cow, calf health, foot health, mastitis, etc.). Record the date of the last review.
 - 1. Organic Herd Health Plan
 - a) Records are kept to confirm treatments are occurring on any animals that need to receive conventional medical attention.
 - b) Products used must provide treatment (Dull-IT not approved for program)
- c. Pain intervention is included in the HHP for animal illness, injury, surgery, dehorning, or any pain-inducing processes (addressing **both** calves and cows)
- d. Extra label medications have directions for use on them per prescribing veterinarian and workers are trained on them
- e. Workers are trained on administering each medication.
- f. Veterinarian-Client-Patient-Relationship (VCPR) can include: employee training by the herd veterinarian on animal treatments and procedures (hospital protocols, dehorning, pain management), prescriptions, or documentation from the veterinarian of a recent visit to the dairy
 - 1. VCPR is signed by the farm owner/management and the veterinarian
 - 2. The VCPR is updated annually or more often as needed
- g. Farm has a documented process for Veterinary Feed Directives (VFD) if applicable
- h. Facility has a written foot care protocol that includes:
 - 1. Use of a trained hoof trimmer using a chute to evaluate animal feet
 - 2. Directive that no hot irons are to be used for cauterizing during trimming (record process only if hot irons are used by herd vet with pain blocks.)
 - 3. Communication chain for an animal observed to be limping or questioned in pain by the employee to be attended in a timely manner
 - 4. Daily observations, evaluation, and care of cows being treated for foot problems (wrap evaluation, wound evaluation)

5. Preventive trimming
 6. Training of personnel in handling and treating lame animals
 7. Use of managed footbaths (if needed as part of their foot care protocol)(when used, verify that they are cleaned and maintained to be effective)
 8. Designated pen for chronic and severe lame cows (closest to milking facilities)
 9. Directive for all animals scoring a 4 or 5 on a lameness score to be placed into the hospital pen, treated, and receive pain alleviation (blocks, wraps, extra bedding, medications)
 10. Holding areas (including the chute) for cattle in the trimming process provide a non-slip surface for cattle to stand on.
 11. Holding areas for cattle being trimmed provide water if the animals are held for more than 4 hours.
- i. The herd health plan includes a protocol for minimizing animal discomfort (therapeutic care, extra bedding, fly/pest control, isolation) and optimizing animal recovery in animals following surgery (Displaced Abomasum's, C-Sections) or injury
 - j. Animal health products require proper storage based on instructions located on the label or according to veterinarian recommendations.
 1. Animal health products are stored in their original containers bearing the product label.
 2. If animal health products are stored in another container, the container must be clearly marked and labeled with product name and expiration date.
 3. Animal health products must not be expired. Outdated materials are properly disposed.
 4. Sharps are contained and disposed of properly
 - k. Use of recombinant bovine somatotropin (rBST) hormones are not allowed.

3. HOSPITAL MANAGEMENT

- a. * Facility provides a clean, dry environment in the hospital area
- b. Health records are updated daily (or as needed depending on animals being treated) and accessible for caretakers involved with health treatments
- c. Animals in hospital pens are monitored daily
- d. * Surgical techniques (Displaced Abomasum's, C-Sections) are done by a veterinarian or personnel that have been trained by a veterinarian (and undergo refresher training at least annually) Personnel are overseen by the veterinarian and the veterinarian is available for consultation if issues arise.
- e. Personnel are trained (interview or record) to move non-ambulatory animals
- f. * Proper equipment (equipment must be large enough for animals that might have to be moved and does not allow body contact with the ground while being moved) is available to move non-ambulatory animals of all sizes
- g. Care is provided to non-ambulatory animals (including pain management, pest control, protection from predators, protection from weather) similar to that provided to other hospitalized animals (Critical issue regarding the ability to provide adequate feed and water in a daily manner and has access to shelter) **CRITICAL**
 - 1. Non-ambulatory animals are given adequate feed and water daily in a manner that encourages consumption (animals must be able to reach feed/water provided) **CRITICAL**
- h. Euthanasia plan is written and includes:
 - 1. Euthanasia is done by an AVMA (American Veterinary Medical Association) acceptable method (gunshot, captive bolt with a secondary method if necessary, or needle injection of euthanasia solution by a veterinarian)
 - a) If gunshot (rifle) is used and it is a .22 magnum caliber or greater, the shell must be a solid point bullet (AVMA/AABP recommendation with an insensibility check)
 - 2. Written protocol includes confirmation of insensibility (no eye reflex) and confirmation of death (lack of a heartbeat, lack of respiration)
 - 3. Written euthanasia protocol includes the decision (and the euthanasia process itself) is to be made in a timely fashion (a daily review of sick animals and if the animal is not responding to treatment within 3 days, treatment is altered, or animal is considered for euthanasia).
 - 4. Written protocol for terminally sick or severely injured (and not treatable) calves includes being euthanized in a timely manner (no longer than 4 hours from the time of the decision to euthanize) **CRITICAL**
 - 5. Equipment is in good working order (written record of cleaning and usage)
 - b) Euthanasia equipment is stored and locked (only those trained have access)
 - 6. Animals in extreme distress (the situation is determined to be irreversible) are euthanized in a timely manner (no longer than 4 hours) **CRITICAL**
- i. Treatment records are current and accessible to employees involved in animal treatments
 - 1. Record of medication use and treatment that includes animal identification, date of treatment, drug administered, dosage, route of administration, withdrawal time, and initials of individual treating animal.
- m. Mortality records are recorded and reviewed by management annually (or as needed if problems arise).
 - 1. Adult animals <8%
 - 2. Weaned calves <2%
 - 3. Pre-weaned calves (24 hrs. to weaning) <5%

4. Records are to identify **as either euthanized** vs. natural causes **or animals culled** and to be available for management review (calves, heifers, and cows)
5. If there is a spike in mortality, records need to be recorded of this incidence and the reason for the spike (i.e., disease, weather, etc.) and steps taken in the future to prevent against this issue.
- n. Mastitis- Removal of a teat due to mastitis is not acceptable unless for a medical reason and completed by the direction of a licensed veterinarian.
 1. **The use of disinfectants in the identified quarter with mastitis is also unacceptable. (CRITICAL)**
- o. A written process is in place for the animals that are determined as severely lame (4 or 5) and are located in the hospital pen, (treat, cull, euthanize).
 1. **Animals identified as severely lame (4 or 5) in the general population by the auditor (CRITICAL)**
 2. Animals identified as severely lame must have housing that is clean, dry, and must be in a loose housing facility (bed pack, pastures, sand) and must be located close to a milking facility.

4. ANIMAL OBSERVATIONS (Note: close up cows defined by the dairy)

- a. * Herd locomotion:
 - <5% of lactating cows score ≥ 3.0 on observation
 - <5% of close up dry cows score ≥ 3.0 on observation (group housing only)
 - <3% of cattle (weaning to breeding) score ≥ 3 on observation
 - <3% of cattle (breeding to calving) score ≥ 3 on observation
- b. * Body condition score:
 - <3% of lactating cows score <2.0 on observation
 - <10% of lactating cows score >4.0 on observation
 - <3% of close up cows score <2.0 on observation
 - <10% of close up cows score >4.0 on observation
 - <3% of calves (birth to weaning) score <2.0 on observation
 - <10% of calves (birth to weaning) score >4.0 on observation
 - <3% of calves (weaning to breeding) score <2.0 on observation
 - <10% of cattle (weaning to breeding) score >4.0 on observation
 - <3% of cattle (breeding to calving) score <2.0 on observation
 - <10% of cattle (breeding to calving) score >4.0 on observation
- c. * Herd hygiene:
 - <8% of lactating and close up dry cows score >2.0 on observation
 - <10% of calves (birth to weaning) >2.0 on observation
 - <10% of cattle (weaning to breeding) score >2.0 on observation
 - <10% of cattle (breeding to calving) score >2.0 on observation
- d. * Leg lesions:
 - <2% of lactating cows observed score a 3.0 on observation
 - <2% of close up dry cows observed score a 3.0 on observation
 - <2% of calves (birth to weaning) score a 3.0 on observation
 - <2% of cattle (weaning to breeding) score a 3.0 on observation
 - <2% of cattle (breeding to calving) score a 3.0 on observation
- e. Tail docking is prohibited from being practiced on the dairy or on owned or purchased replacements **(CRITICAL)** Switch trimming is allowed.

5. NUTRITION MANAGEMENT-

- a. * Feed is available to lactating cows at least 20 hours per day
- b. * Feed is available to calves, heifers and dry cows at least one time in a 24-hr period
- c. Feed ration meets the National Research Council (NRC) requirements for dairy cattle for each age and stage of animal (verify through documentation from the nutritionist)
- d. * Water is positioned throughout the dairy to allow ad lib access to drinking water
- e. * Water flow matches consumption (animals are not standing around an empty trough)
 - 1. Water tanks are cleaned on a regular basis and provide clear drinking water
 - 2. Average score of water troughs cleanliness observed across facility is 2 or less
 - 3. Water tanks are the proper height for age/size of animals using them
 - 4. * Water tanks are protected from freezing
 - a) Calves provided with water (in individual buckets) must have access to drinkable water at least twice per day during freezing weather
 - 5. * Water is available to cows at the parlor exit (dry lot facilities)
 - 6. Animals in confinement longer than 2 hours (except in the parlor holding area) have access to water **CRITICAL**

6. FACILITIES

- a. * General facilities (gates, fences, flooring, stall loops, shade, headlocks, feed/water troughs, fence lines, drainage lines, etc.) are maintained to prevent animal injury
 - 1. Ensure chutes and headlocks (quick release) are properly functioning to reduce potential animal or operator injury.
- b. * Electric fences must be designed, maintained and used so that contact with them does not cause injury
- c. * Electric backing/crowd gates must be designed, maintained and used so that contact with them does not cause injury
- d. * Non-slip footing is provided throughout the facility
 - 1. <1% of cows observed fall
 - 2. <3% of cows observed slip
 - 3. <1% of heifers observed fall
 - 4. <3% of heifers observed slip
- e. * Facility provides lighting in the treatment/special needs and feed mixing areas for observation, examination and movement of cattle
- f. * Pest control program (flies, birds, rodents, etc.) appears to be effective in minimizing signs of pests
- g. * Housing air flow controls moisture (condensation), odor and ammonia at <25ppm
- h. * Additional cooling is provided in the holding pen (enough fans for the size of the pen for air movement)
- i. * Process viewed regarding minimizing cross-contamination (from feed to manure, manure to feed, use of different equipment)
- j. * **All animals have access to shade no matter the area or region that the dairy resides** (50 sq. ft. for 800 lbs. plus animals; 25 sq. ft. for younger)
 - a. Animals evaluated for signs of heat stress (i.e., open mouth breathing).
- k. * Where winter conditions dictate, shelter (e.g., windbreaks, mounding) is required
- l. * Animals giving birth outdoors must have shelter and protection from adverse weather conditions and area is well drained.

- m. Signs throughout the facility are posted to control visitor entry (farm gate signs or signs with directions to the office)
1. Stanchion/Tie stalls are not accepted in this program. Tie stalls do not allow for animals to express their normal behaviors. **CRITICAL**
 2. * Free stalls
 - a) Animals can stand up and lie down easily within the stall (without hitting hip bones, brisket, or head when getting up).
 - b) Stall mattresses are maintained (Edges are not pulled up to trip animals, bedding is maintained daily)
 - c) Stalls are bedded (Proper bedding amount equates to leg lesion observations)
 3. * Dry lots or pastures
 - a) Lot surfaces, traffic lanes, and dry lot/pasture mounds are maintained to prevent animal injury
 - b) Traffic lanes are maintained (groomed)
 - c) Animals housed in dry lots and pastures have access to dry areas during inclement weather
 4. *Compost-bedded pack barns
 - a) 100 square foot per Holstein sized cow
 - b) 85 square foot per Jersey sized cow
 - c) Bed pack material must be dry (not sticking to animal) and comfortable to the cow
- n. * Stocking rates provide a minimum of 18 inches per cow at feed bunk to ensure that all animals have healthy eating/ruminating patterns (Batchelder, 2000; DeVries et al., 2004; DeVries and von Keyserlingk, 2006); Grant & Albright, 2001; Huzzey et al., 2006; Metink and Cook, 2006)*see footnote/references
- Two-row barns: <120% (1.2:1) animal: stall ratio
 - Three-row barns: <100% (1:1) animal: stall ratio
 - Dry lot pens: <1.2:1 animal:headlock ratio
- (Freestalls, headlocks, and feed bunk space are measured during the audit for stocking rates, but animal based outcome measures such as Body Conditioning Scores, Hygiene, Locomotion, and Hock/Leg Lesion observations must be met and not exceed 120% stocking density in order to verify meeting the standard.)
- If body condition scores, and locomotion scores, indicate that animals have quality resting time/area, then this area can be marked as “acceptable” if animals are not competing for feed, water, and places to lie down

7. PARLOR MANAGEMENT

- a. Milking equipment has been tested and documented (in the past 6 months)
- b. * Wait times in the parlor/holding pen are less than 5 hr./pen/24 hr. (If a site has two parlors on the same premise location, then the auditor will observe 2 turns per parlor to determine timing)
- c. * Animals are calm through the milking process; parlor behavior is ≤ 2.0
- d. * Cows are evaluated (visually, palpation, stripping) for mastitis as part of milking routine
- e. * Teats are treated (dipped or sprayed) post-milking
- f. * Rapid exit: if used, there is adequate room for cows to exit without being hit by stalls
- g. * Crowd gate: if used, caretakers are trained to use the gate sensibly and not aggressively
- h. * Crowd gate: if used, cows are calm in holding pens
- i. * Robotic milking systems
 - 1. There is a process in place for animals to be monitored when using a robotic system for animal observations (lameness, BCS, etc.) to ensure animals are entering the robotic system.
 - 2. There is a system in place if the robotic system malfunctions or not properly working.
 - Producer is able to identify cows that have not been milked if the system is not working properly and has a system to milk cows until robotic system is fully functioning.

8. HANDLING & TRANSPORT

- a. Employees trained in animal handling and appropriate tools for movement (flags, gates, flight zones)
- b. Employees are specifically trained on or supervised when using moving or restraint devices (halters, hip clamps, headlocks, chutes)
 - 1. Nose tongs are not to be used as part of this program as an acceptable moving device.
- c. Non-employees (contractors, consultants, foot trimmers, breeders, and drivers) on the farm are given the same expectations in writing regarding animal handling and care and sign an animal care protocol form.
- d. * Animals move calmly throughout facility during the audit
- e. Written animal handling protocol gives clear directives to NOT break tails or ear twisting when moving animals. (Proper tail use for movement is to release the tail once the animal moves forward. The tail is not continuously twisted).
- f. Only handling tools that are approved by management (and caretakers have been trained on proper use) are used during loading and unloading
- g. * Prods (Battery powered and NOT AC powered) are used only in emergencies to move animals and are **never** to be used in sensitive areas (eyes, ears, nose, rectum, or genitals) on any age or class of livestock
- h. Animals are evaluated for their ability to survive a haul without problems prior to being loaded on truck for shipping include: animal walks easily, animal is healthy with no residue, animal has a BCS of 2.0 or better, animal is not blind in both eyes, animal scores a locomotion score of 3 or less and the animal is not exhibiting signs of severe pain; animals with questionable survival chances are to be euthanized (including calves)

1. Any animal transported from the dairy is the responsibility of the dairy management team. The team must ensure that anyone involved with handling and transportation are aware of their responsibilities.
 - i. Written protocol clearly directs that animals in question of surviving the haul are NOT to be shipped, but returned to the hospital pen for further treatment or euthanized
 - j. * Holding pens used to retain animals prior to transport must provide feed (if held more than 4 hours) and water (if held more than 2 hours)
 - k. * Loading facilities (gates, chutes) are maintained to be safe for livestock and caretakers
 - l. * Loading facilities have non-slip footing (grooving, non-skid mats, sand, bedding) and with measures to prevent animals falling off or getting their legs trapped
 - m. * Trailers used to haul calves <2 week are bedded
 - n. * Calves that are injured or too weak to stand are not transported, but given therapeutic care or humanely euthanized
 - o. Hired transporters have received their Beef Quality Assurance certification in order to haul cull dairy cows to the plant. (Information gathering in 2022)
 - p. Drivers are following the USDA 49 USC Sec. 80502 – 28 Hour Law when hauling dairy cows and calves (distance from farm to the next destination is under 28 hours). (Information gathering in 2022)
 - q. Distance that calves travel from dairy to next destination (Information gathering in 2022)

9. CALVES AND HEIFERS

- a. Written protocol for colostrum management includes: testing for antibody amount; monitoring calves for successful passive transfer; monthly review of the colostrum program; and passive transfer monitoring by herd veterinarian or management
 1. Exception for colostrum program only if calf is left on the cow for 24-48 hours
 2. Monitoring calves for successful passive transfer is still needed
- b. Heifer calves receive at least 4 quarts or 10% of body weight of colostrum or equivalent colostrum replacer within 12 hours of birth **(CRITICAL)**
- c. Bull calves either receive at least 4 quarts or 10% of body weight of colostrum or equivalent colostrum replacer within 12 hours of birth **or** are humanely euthanized at birth **(CRITICAL)**
- d. * Neonatal calves being held for transport directly to slaughter ("bob veal") must be provided at least 4 quarts of milk or milk replacer each day and provided housing and medical care similar to other calves
- e. * Calves are born in a clean, dry environment
- f. * Calf navels are dipped to avoid infection
- g. Calves have access to feed (solid feed at day 3) and water (day 1) **(CRITICAL)**
- h. * Calf housing is dry, clean, comfortable bedding, and adequately ventilated
- i. * Calf pens are dry, clean, comfortable bedding, and adequately ventilated
- j. * Individual calf housing allows the calf to turn around
- k. * Calf housing provides calf protection from the elements
- l. * Calves are observed daily for health issues
- m. Written protocol exists for flagging (or communicating with management or personnel) to treating sick calves
- n. * Calves are vaccinated according to veterinarian or industry recommendations
- o. * Supernumerary teats are not to be removed unless it interferes with the teat cup at milking. If removed due to issues with the teat cup, this procedure must be done by 4 months of age; if older, anesthetic is used

- p. * Calves are castrated according to AVMA recommendations (banding, scalpel, up to 4 days of age); veterinary supervision and training; herd health plan defines protocol including pain alleviation
- q. * Calves disbudded up to 4 days of age; if disbudded or dehorned after day 4, anesthesia (lidocaine) and analgesia (such as aspirin, flouxin, meloxicam, ketoprofen) is used as determined in the herd health plan; medications provided as extra-label use by the herd veterinarian have directions for use on them; workers are trained on administering of each medication
- r. Electric prods are not used to drive calves **(CRITICAL)**
- s. Electric shock devices (electric prods) are to be used only by those that have been trained by the herd veterinarian or herd manager. (records of training need to be provided).
- t. Branding is prohibited in States that do not require it. Branding is only acceptable if required by state law (hot or freeze branding) **(CRITICAL)**
- u. * Calves will be moved to group housing within at least 70 days of birth
 1. Include in the Herd Health Plan processes for calves that need more attention and the process for keeping the identified calves out of group housing

Validus Audit Process

The Validus process includes an annual audit (per calendar year). Dairies must score $\geq 80\%$ and no critical issues identified on the day of the audit to retain certification. Any item identified in the audit report that is a non-conformance will need to have a corrective action plan developed for the steps to be taken to address the non-conformance.

- The action plan developed by the client will be reviewed by Validus and potentially any supplier/retailer that is purchasing product from the producer in order to see that steps are being taken to address the non-conformances
- Action plans will be reviewed to ensure that there is a timeline in place to complete the non-conformances
- Any action item that is not addressed within the timeline set forth will result in a major non-conformance with the potential that the certification will be held until completed/addressed based on the action plan
- Certification will not be issued unless the corrective action plan is submitted, reviewed, and approved by Validus

The Validus Animal Welfare Review-Dairy committee reviews the standards on an annual basis to make changes and improvements. The committee is made up of the following individuals: Dr. James Reynolds, Dr. James West, Dr. Wendell Cole, Dr. Jan Shearer, and Dr. Rick Tubbs.

Animal Welfare point changes examples:

- Audit question-
 - Less than 3% of lactating cows observed score less than 2.0 BCS (note percentage)- Changed from 10 to 20 points
 - Less than 2% of lactating & close up cows observed score 3 on observation (note percentage)- Changed from 10 to 20 points

Validus auditor background

- Validus utilizes auditors that have a degree and 5 years' experience in the industry or a minimum of 15 years of experience within the industry.
- All auditors are required to go through classroom and on-farm shadows before completing on-farm audits.
- Validus auditors go through annual trainings and are subject to an oversight inspection.
- Auditors sign a "Code of Conduct" to ensure that there is no previous or current conflict of interest working relationship between the auditor and the dairy producer.

Footnote

Stocking rates may be exceeded for reasons such as a herd expansion and new buildings falling behind in construction. If stocking rates are exceeded for short periods of time, management can compensate to minimize the effect on the animals (increasing the frequency of feeding, barn cleaning, stall bedding, etc.). The more dominant animals may not suffer any consequences; however, the younger, smaller or more timid animals may become subject to reduced feeding times, reduced feed intake, reduced lounge time in the stalls, etc. These changes in their normal behavior time budgets can affect their health and comfort. If stocking rates are exceeded for short periods of time and management compensates as described above, direct animal observations (hygiene, locomotion, hock and knee lesions, and body condition) and herd implications (mortality rates, etc.) may not be seen. In these cases, overstocking the barns for a period of a few months may not be considered detrimental to animal health and welfare. However, if the overcrowded conditions result in dirty cows, increased lameness, increased hock and knee lesions, reduced body condition, or increased mortality rates, the situation must be corrected (lower stocking rates) quickly. In both cases, the overcrowding will be handled as an audit non-conformance. But the entire scenario will be considered when evaluating corrective action plans from the producer and the timeframes allowed for addressing the situation.

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