



# Animal Care Task Force Recommendations for Version 5.0 of the FARM Animal Care Program: Public Comment Period Summary

## January 2023

### PURPOSE, OBJECTIVES, & BACKGROUND

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Implementation of Version 4 of the National Farmers Assuring Responsible Management (**FARM**) Animal Care Program is well underway. Keeping in line with the goal of striving for continuous improvement, the National FARM Animal Care Program is looking ahead to potential areas of improvement for Version 5 of the program, which is due to be released in 2024. Throughout 2022, the FARM Animal Care Task Force (**ACTF**) and NMPF Animal Health and Well-Being Committee (**AHWP**) has worked diligently to develop recommendations for Version 5 of the FARM Animal Care Program based on many hours of discussion, scientific literature review, and data analysis.

While preparations for Version 5 will continue into 2023, the FARM program felt it was important to receive public comment and sentiments on the current recommendations for the new iteration of the program. In the fall of 2022, the FARM ACTF and AHWP released their proposed recommendations for public comment via an electronic survey that was shared on various public platforms to encourage participation. The survey was available from September 12 – November 1 and then briefly re-opened from November 14 –30 to allow for additional responses.

A total of 475 survey submissions were recorded; however, of those submissions, 302 included responses to at least one survey question. Only those 302 submissions were kept for further review, as only those submissions with at least one question answered were retained for analysis. In addition to the electronic survey submissions, 6 written submissions were received from 5 organizations and 1 farmer. The organizations that submitted a written response included the Animal Welfare Institute, Food Armor Foundation, Professional Dairy Producers (**PDPW**) Board, Saputo, and Dairy Farmers of America (**DFA**). Members of DFA did not respond to the public comment survey individually. Their responses to 9 proposed revisions were polled independently and shared with the FARM team for inclusion in this survey. Those votes (n = 113) are reflected within the summary below. Sentiment votes and comments from all written submissions, as well as the electronic survey, are collectively summarized below. Please note, as not all survey respondents answered every question, the total number of responses to each question varies. Additionally, selecting “unsupportive” or “neutral” as sentiment to the recommendations below did not necessarily indicate that the individual was against the proposed recommendation, but rather that there were differing views (e.g., seeking clarity, additional stringency, etc.) from what was proposed. Some of the current Version 4 standards and proposed recommendations listed below are associated with corrective actions. Standards resulting in a Mandatory Corrective Action Plan (**MCAP**) have a resolution time of 9 months, whereas Continuous Improvement Plans (**CIP**) allow for 3 years to resolve the corrective action.



| Current V4 Standard   | Proposed Recommendation<br>(# of people that voted)   | Votes & Sentiments   |  |
|---|---|--|--|
|   |   | Supportive   | Neutral / Unsupportive   |
| <b>Topic 1: Animal Care</b>   |   |  |  |
| <b>Body Condition Scoring:</b><br>99% or more of each age class of animal (pre-weaned calves, post-weaned heifers, dry cows, and lactating cows) observed have a body condition score of 2 or greater on FARM Body Condition. (CIP) | Maintain the current BCS scoring system for all age classes of animals.<br><br><b>(n = 292)</b>   | <b>81%</b> <ul style="list-style-type: none"> <li>A more detailed scale is more valuable</li> <li>Farmers are familiar with this</li> <li>Agreement with the rationale provided</li> <li>3-point scale is too limiting</li> <li>Supportive of the recommendation and would like to see the standard elevated to an MCAP</li> </ul> | <b>14% / 5%</b> <p>BCS In Practice:</p> <ul style="list-style-type: none"> <li>BCS is subjective and interpreted differently by each evaluator</li> <li>Concern over implementation/rounding down</li> <li>Concern over healthy/high producing score 1 cows</li> </ul> <p>Preferences for Different Score:</p> <ul style="list-style-type: none"> <li>Preferences for both 5- and 3-point scales</li> <li>Request to include 0.25 increments</li> </ul> <p>Sampling:</p> <ul style="list-style-type: none"> <li>Herds of less than 100 are disproportionately penalized</li> </ul>   |
|   | Update standard to evaluate sufficient quantities of feed for maintenance, health, growth, and vigor criteria using BCS. <b>(n = 264)</b> | <b>61%</b> <ul style="list-style-type: none"> <li>Agreement with the rationale provided</li> <li>BCS will show quantity and quality of feed</li> <li>The previous wording was subjective, this change provides clarity</li> <li>BCS shows a more complete picture</li> </ul>   | <b>25% / 14%</b> <p>Confusion &amp; Personal Preference:</p> <ul style="list-style-type: none"> <li>Confusion over what change is being proposed</li> <li>No need for change</li> </ul> <p>BCS In Practice:</p> <ul style="list-style-type: none"> <li>Cannot be evaluated accurately &amp; too subjective</li> <li>BCS does not evaluate vigor, nutritional wellness, feed quality, or growth</li> <li>BCS determined by too many factors</li> </ul> <p>A Desire for More:</p> <ul style="list-style-type: none"> <li>Feed should be evaluated for quality</li> <li>Farmers should be able to demonstrate this in multiple ways – i.e. feed, calories, BCS, etc.</li> </ul> |

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| <b>Topic 1: Animal Care</b>  |  |  |   |
| <p><b>Lameness:</b><br/>95% or more of the lactating cows observed score 2 or less on the FARM locomotion scorecard. (CIP)</p>   | <ol style="list-style-type: none"> <li>1. Establish a moderate lameness (score 2) benchmark of no more than 15%</li> <li>2. Establish a Continuous Improvement Plan (CIP) for the moderate lameness (score 2) benchmark of no more than 15%</li> <li>3. Maintain current benchmark of no more than 5% for severe lameness (score 3)</li> </ol> <p>In total, 80% or more of the cows observed must score 1, no more than 15% of cows observed score 2, and no more than 5% of cows observed score 3. <b>(n = 367)</b></p> | <p><b>43%</b></p> <ul style="list-style-type: none"> <li>• Agreement with the rationale provided</li> <li>• The current requirement for 5% score 3 should be elevated to an MCAP</li> <li>• This will be a positive change</li> <li>• Lameness is a critical issue for the industry</li> <li>• Much-needed step toward continuous improvement</li> </ul> | <p><b>28% / 29%</b></p> <p>Evaluation Concerns:</p> <ul style="list-style-type: none"> <li>• Not accurately assessed on all farms (e.g., tie-stalls)</li> <li>• Evaluating lameness is too difficult to do consistently</li> </ul> <p>Farm Size Concerns:</p> <ul style="list-style-type: none"> <li>• Difficult for small farms to meet</li> </ul> <p>A Desire for More:</p> <ul style="list-style-type: none"> <li>• This standard is not strict enough, lameness is a huge welfare concern</li> <li>• 5% severe lameness should be an MCAP</li> <li>• 15% moderate lameness is too high</li> <li>• Start at 20% moderate lameness</li> </ul> <p>Personal Preferences:</p> <ul style="list-style-type: none"> <li>• Do not change the standard</li> </ul> |
| <p><b>Hygiene:</b><br/>90% or more of pre-weaned calves (&gt;2 days old), post-weaned heifers, pre-fresh heifers/dry cows and lactating cows observed score 2 or less on the FARM hygiene scorecard.</p> | <p>Maintain current standard for hygiene (no applied CIP if the benchmark is not met).<br/><b>(n = 250)</b></p>  | <p><b>71%</b></p> <ul style="list-style-type: none"> <li>• Agreement with the rationale provided</li> <li>• Hygiene is impacted by many external variables, so this recommendation makes sense</li> <li>• Supportive of not elevating this standard</li> <li>• Well thought out rationale</li> </ul>   | <p><b>20% / 9%</b></p> <p>Consistency:</p> <ul style="list-style-type: none"> <li>• External variables affect hygiene making it difficult to evaluate</li> <li>• Weather is a challenge but hygiene should still be managed in all conditions</li> <li>• Evaluation is too subjective</li> </ul> <p>An Alternate Approach?</p> <ul style="list-style-type: none"> <li>• SCC says more about hygiene</li> <li>• Difficult for small farms</li> </ul> <p>A Desire for More:</p> <ul style="list-style-type: none"> <li>• This standard should be elevated to a CIP</li> <li>• Why measure if no action is being taken?</li> </ul>   |

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|--|---|--|---|
|  |   | Supportive   | Neutral / Unsupportive  |
| <b>Topic 1: Animal Care</b>  |   |  |   |
| <p><b>Tails:</b><br/>95% or more of lactating cows observed do not have broken tails. (CIP)</p> <p>The facility complies with the ban on routine tail docking. (IAP)</p> | <p>Maintain benchmark at 95% of lactating cows do not have broken tails, maintain CIP, and update guidance in scoring approach.</p> | <p><b>37%</b></p> <ul style="list-style-type: none"> <li>A reasonable solution to finding the root cause of the problem</li> <li>Agreement with the rationale provided</li> <li>More guidance is well received</li> <li>Recognition that broken tails is a concerning problem</li> </ul> | <p><b>29% / 34%</b></p> <p>Consistency &amp; Application:</p> <ul style="list-style-type: none"> <li>Concerns over scoring system – score the whole herd</li> <li>Evaluators are inconsistent and the scoring guidance just changed</li> <li>Concerns about smaller farms being affected</li> </ul> <p>A Desire for No Change or Less:</p> <ul style="list-style-type: none"> <li>Current standard is fine</li> <li>Lower the benchmark (suggestions of 50% - 90% unbroken)</li> <li>Might be unachievable for some</li> </ul> <p>A Desire for More:</p> <ul style="list-style-type: none"> <li>Raise the benchmark (suggestions of 99% - 100% unbroken)</li> <li>Should be an MCAP</li> </ul>  |
|  | <p>Maintain current stance on tail docking, with updated definition. (n = 240)</p>  | <p><b>57%</b></p> <ul style="list-style-type: none"> <li>Agreement with the rationale provided</li> <li>Tail docking is unnecessary</li> <li>Scientific literature supports this stance</li> <li>Allowance of tail docking only if medically necessary is supported</li> </ul>           | <p><b>19% / 24%</b></p> <p>Questioning the Science:</p> <ul style="list-style-type: none"> <li>Studies on this topic do not reflect reality of farming</li> </ul> <p>Concern Over Prescriptive Expectation:</p> <ul style="list-style-type: none"> <li>Allow farmers to make the choice</li> </ul> <p>Justifying the Practice:</p> <ul style="list-style-type: none"> <li>Tails cause injuries</li> <li>Tail docking allows for cleaner cows and a safer environment; tails increase SCC</li> <li>Tail docking can be done humanely and should be allowed</li> <li>Other species allow tail docking</li> </ul> <p>Record Keeping Burden:</p> <ul style="list-style-type: none"> <li>Should not have to record medically necessary tail docking</li> </ul> |

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| <b>Topic 2: Painful Procedures</b>  |  |  |  |
| <b>Pain Mitigation:</b><br>Pain mitigation for disbudding is provided (CIP)<br><br>Pain mitigation for branding is provided<br><br>Pain mitigation for castration is provided | Maintain standard on pain mitigation for all disbudding and dehorning procedures and update action plan to MCAP. (n = <b>344</b> )   | <b>47%</b> <ul style="list-style-type: none"> <li>Agreement with the rationale provided</li> <li>Pain mitigation should be defined as well</li> <li>Glad to see progress in this area</li> <li>Adds urgency to the situation</li> <li>Other animal welfare programs are even more stringent</li> <li>Reflects the continuous improvement goal of the program</li> <li>Important for industry image and important to consumers</li> </ul> | <b>26% / 27%</b><br><br>Questioning the Science: <ul style="list-style-type: none"> <li>Science is flawed and not consistent on this topic</li> <li>Paste does not require pain control</li> <li>Young calves don't require pain control</li> </ul> Veterinarian Inconsistency: <ul style="list-style-type: none"> <li>Veterinarians are not aligned on this topic, therefore it shouldn't be required</li> <li>Should be up to veterinarians to recommend</li> </ul> Concerns Over Access/Options: <ul style="list-style-type: none"> <li>Concerns about the availability of drugs and drug options in general</li> <li>Concerns about organic farms</li> </ul> Level of Corrective Action: <ul style="list-style-type: none"> <li>Keep as a CIP</li> </ul> |
|   | Maintain stance on not specifying appropriate (or unacceptable) pain mitigation methods for disbudding or dehorning. The decision should be left to the Veterinarian of Record to decide what is appropriate for the farm. (n = <b>226</b> ) | <b>69%</b> <ul style="list-style-type: none"> <li>Agreement with the rationale provided</li> <li>Agree that it should be left up to the vet of record</li> <li>Agreement but concern over veterinarians that do not prescribe pain medication</li> <li>Appreciate the decision being left up to the VOR and the farmer</li> </ul>  | <b>22% / 9%</b><br><br>Veterinary Access & Inconsistency: <ul style="list-style-type: none"> <li>Some veterinarians don't support/recommend pain control</li> <li>Some producers don't have easy access to a VOR</li> </ul> Desire for More: <ul style="list-style-type: none"> <li>Should be more prescriptive &amp; require methods that are proven to be effective</li> <li>Minimum local anesthetic and NSAID should be required</li> <li>Use AABP standards to be consistent</li> <li>Too subjective</li> </ul>   |

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| <b>Topic 2: Painful Procedures</b>  |  |   |  |
| <b>Disbudding:</b><br>All calves are disbudded before 8 weeks of age (MCAP) | Maintain standard around disbudding calves within 8 weeks of age. <b>(n = 226)</b>   | <b>71%</b> <ul style="list-style-type: none"> <li>Agreement with the rationale provided</li> <li>No reason to wait longer than 8 weeks</li> <li>Positive response around standards that support scientific evidence and help to move the industry forward</li> </ul>      | <b>19% / 10%</b> <p>Concern Over Inflexibility:</p> <ul style="list-style-type: none"> <li>Cases where there is horn regrowth or missed horns (e.g., polled calves)</li> <li>Exceptions need to be made for misses, mistakes, etc.</li> </ul> <p>Misalignment with Farm/Advisor Preferences:</p> <ul style="list-style-type: none"> <li>Moving/weaning calves at 8 weeks is already stressful</li> <li>Some vets don't want to dehorn before 12 weeks</li> </ul>   |
|   | Update standard for acceptable methods of disbudding of calves less than 8 weeks of age to be caustic paste and cautery only. <b>(n = 338)</b> | <b>61%</b> <ul style="list-style-type: none"> <li>Agreement with the rationale provided</li> <li>The 2 suggested methods are effective and useful</li> <li>Consistent with AABP guidelines</li> <li>Supportive of the standard and feel that it is appropriate</li> </ul> | <b>25% / 14%</b> <p>Inflexibility:</p> <ul style="list-style-type: none"> <li>Need a method to deal with missed horns/regrowth</li> <li>May not be accessible for Amish/Mennonite farms (no cautery)</li> </ul> <p>Concern Over Prescriptive Expectation:</p> <ul style="list-style-type: none"> <li>This should be left up to farmers and their VOR</li> </ul> <p>Need for Support:</p> <ul style="list-style-type: none"> <li>Farmers need training in these methods and education on the pros/cons of each</li> </ul> |

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| <b>Topic 2: Painful Procedures</b>  |  |  |  |
| <p><b>Castration (if conducted at the facility):</b><br/>Bulls being raised as dairy steers are castrated at the earliest age possible</p> <p>Pain mitigation for castration is provided</p> <p>The written herd health plan includes an effective written protocol for castration</p> <p><b>Branding (if conducted at the facility):</b><br/>Cattle are branded at the earliest age possible</p> <p>Pain mitigation for branding is provided</p> <p>The written herd health plan includes an effective written protocol for branding</p> | <p>Update standard to CIP If pain mitigation is not provided, and/or if a protocol is not present, for castration or branding.</p> <p><b>(n = 336)</b></p> | <p><b>38%</b></p> <ul style="list-style-type: none"> <li>• Agreement with the rationale provided</li> <li>• Support for pain control for these practices</li> <li>• Desire to move towards eliminating branding</li> <li>• Good progress for the industry</li> <li>• Logical and reasonable expectation</li> </ul> | <p><b>35% / 27%</b></p> <p>Regulatory Expectations:</p> <ul style="list-style-type: none"> <li>• Branding is state law</li> </ul> <p>Concern Over Prescriptive Expectation:</p> <ul style="list-style-type: none"> <li>• Should be left up to farmer and vet</li> </ul> <p>Questioning the Science &amp; Impact:</p> <ul style="list-style-type: none"> <li>• Branding/castration early does not require pain control</li> <li>• Pain control isn't effective for these procedures</li> <li>• This is unnecessary - animals don't feel pain the way humans do</li> </ul> <p>Desire for More:</p> <ul style="list-style-type: none"> <li>• Branding should be banned</li> </ul> |

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| <b>Topic 3: Calf Management</b>   |  |   |   |
| <p><b>Water Provision:</b></p> <p>All pre-weaned calves (heifers and bulls) have access by day 3 to clean, fresh water appropriate for climatic conditions. (MCAP)</p>  | <p>Maintain existing standard to require provision of water for all pre-weaned calves by day 3. <b>(n = 219)</b></p> | <p><b>67%</b></p> <ul style="list-style-type: none"> <li>• Agreement with the rationale provided</li> <li>• Water is important for calf health</li> <li>• The consistency in age with day 3 is well received</li> </ul>   | <p><b>20% / 13%</b></p> <p>Practicality/Flexibility:</p> <ul style="list-style-type: none"> <li>• Calves do not drink water this young</li> <li>• Water freezes in the winter – this is not practical</li> <li>• Should be 5-7 days</li> </ul> <p>Clarity:</p> <ul style="list-style-type: none"> <li>• Too vague – clarify if access is required 24/7</li> </ul> <p>Scope:</p> <ul style="list-style-type: none"> <li>• What about calves on trucks for 2-3 days without water?</li> </ul>   |
| <p><b>Calf Nutrition:</b></p> <p>All pre-weaned calves (heifers and bulls) receive volume and quality of colostrum or colostrum replacer within 6 hours after birth, even if immediately transported off the farm. (MCAP)</p> <p>All pre-weaned calves (heifers and bulls) receive a volume of milk or milk replacer to maintain health, growth and vigor until weaned or marketed. (MCAP)</p> <p>All pre-weaned calves (heifers and bulls) are offered fresh, palatable starter feed by day 3 to maintain health, growth and vigor. (MCAP)</p> | <p>Maintain standard requiring colostrum within 6hrs <b>(n = 220)</b></p>  | <p><b>72%</b></p> <ul style="list-style-type: none"> <li>• Agreement with the rationale provided</li> <li>• Preference for additional guidelines on amount of colostrum to feed based on calf size</li> <li>• Extremely important for calves</li> <li>• 6hrs is a reasonable timeframe</li> <li>• Colostrum is critical in a timely manner</li> <li>• Requests for guidelines around assessing quality</li> </ul> | <p><b>16% / 12%</b></p> <p>Practicality/Flexibility</p> <ul style="list-style-type: none"> <li>• Calves on dam</li> <li>• Small farms can't meet 6hrs</li> </ul> <p>Evaluation Concerns:</p> <ul style="list-style-type: none"> <li>• Morbidity/mortality is a better measure</li> <li>• How is this evaluated/enforced/verified?</li> </ul> <p>Personal Preference:</p> <ul style="list-style-type: none"> <li>• Should be based on VOR recommendation</li> <li>• Not needed</li> </ul> <p>A Desire for More:</p> <ul style="list-style-type: none"> <li>• Should be 2hrs</li> <li>• Should be more stringent</li> </ul> |

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|   |   | Supportive  | Neutral / Unsupportive  |
| <b>Topic 3: Calf Management</b>   |   |   |   |
| <p><b>Freedom of Movement:</b><br/>All age classes of animals have housing that allows for the ability to easily stand up, lie down, adopt normal resting postures and have visual contact with other cattle without risk of injury.</p> <p>All age classes of animals have a method of daily exercise (weather permitting, if outdoors).</p>   | <p>Affirm that the standard around daily exercise and housing applies to pre-weaned calves. In addition, the piece specifying that calves can “turn around” encompasses adequate space for calves housed in all housing types. <b>(n = 330)</b></p> | <p><b>56%</b></p> <ul style="list-style-type: none"> <li>• Agreement with the rationale provided</li> <li>• This is important for calf welfare</li> <li>• The clarity is useful</li> </ul>  | <p><b>31% / 14%</b></p> <p>Clarity &amp; Consistency:</p> <ul style="list-style-type: none"> <li>• Define exercise</li> <li>• Subjective and difficult to evaluate</li> <li>• Should also apply to cows in tie-stalls</li> </ul> <p>Flexibility:</p> <ul style="list-style-type: none"> <li>• Visual contact not possible when individually housing to prevent disease</li> <li>• Shouldn't apply to pre-weaned calves, hutches, or tie-stalls</li> </ul> <p>Desire for More:</p> <ul style="list-style-type: none"> <li>• Should be a CIP or MCAP</li> </ul> |
| <p><b>Calf Housing:</b><br/>All age classes of animals have housing that allows for the ability to easily stand up, lie down, adopt normal resting postures and have visual contact with other cattle without risk of injury.</p> <p>All age classes of animals have a resting area that is clean, dry, provides traction at all times when away from the milking facility and does not pose risk of injury.</p> <p>All age classes of animals have a method of daily exercise (weather permitting, if outdoors).</p> | <p>Maintain housing neutrality - no inclusion of size specifications for calf housing in a standard. <b>(n = 213)</b></p>   | <p><b>78%</b></p> <ul style="list-style-type: none"> <li>• Agreement with the rationale provided</li> <li>• Using outcomes-based measures is important for assessing calf housing</li> <li>• Sufficiently addressed with calf movement standard for turning around</li> </ul> | <p><b>18% / 4%</b></p> <p>Clarity:</p> <ul style="list-style-type: none"> <li>• Language is vague – define exercise</li> <li>• Examples would be helpful</li> <li>• Designate which groups are included in the standard</li> </ul> <p>Desire for More:</p> <ul style="list-style-type: none"> <li>• Should have a minimum requirement for size</li> <li>• Encourage less restrictive housing</li> <li>• Should be an MCAP</li> </ul>  |

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| <b>Topic 4: Treatment Records</b>  |   |  |   |
| <p>The written herd health plan includes an effective written protocol for vaccinations that specifics: Age(s) when vaccination given, product used, dosage administered, route of administration, withdrawal times.</p> <p>The facility has permanent (written or electronic) treatment records for the treatment of the facility's common diseases. Records include: date of treatment, animal treated identification, name of treatment used, disease/condition being treated, dosage administered, route of administration, duration of the treatment, specified withdrawal times for milk and meat to ensure food safety (CIP).</p> <p>Each animal is permanently identified.</p> | <p>Add "withhold" in addition to "withdrawal" to the vaccine protocol standard. <b>(n = 209)</b></p>  | <p><b>60%</b></p> <ul style="list-style-type: none"> <li>• Agreement with the rationale provided</li> <li>• Minor update that will provide clarity</li> <li>• This is an important concept and the update is welcomed</li> </ul>   | <p><b>29% / 11%</b></p> <p>Clarity:</p> <ul style="list-style-type: none"> <li>• Unclear if vaccines are in treatment record</li> </ul> <p>Record-Keeping Burden:</p> <ul style="list-style-type: none"> <li>• Not necessary, recording too much detail</li> <li>• Information is available on the label – recording this duplicates efforts</li> </ul> <p>Questioning Relevance:</p> <ul style="list-style-type: none"> <li>• Not relevant to animal health and creates more work for farmers</li> </ul> |
|  | <p>To adopt treatment definition as: <i>Therapeutic drug use is defined as the administration of a drug (not including vaccines or hormones) that has an identified withdrawal/withhold time, requires a prescription and/or veterinary feed directive, and/or is associated with a milk or meat violative residue.</i> <b>(n = 207)</b></p>  | <p><b>63%</b></p> <ul style="list-style-type: none"> <li>• Agreement with the rationale provided</li> <li>• Useful to prevent farms from being penalized for not knowing/forgetting something</li> <li>• Clarifications are welcomed</li> <li>• Desire for more - hormones, supplements, etc. should also be recorded</li> </ul> | <p><b>27% / 10%</b></p> <p>Clarity:</p> <ul style="list-style-type: none"> <li>• Questions about what is included</li> </ul> <p>Record-Keeping Burden:</p> <ul style="list-style-type: none"> <li>• Complicates things and creates more work for farmers</li> </ul> <p>Desire for More:</p> <ul style="list-style-type: none"> <li>• Non-FDA should be recorded</li> <li>• Hormones, vaccines, should be included</li> <li>• Anything considered a "treatment" should be included</li> </ul>              |
|  | <p>Clarify expectations for the master protocol. The master protocol can include: treatment name, disease/condition being treated, recommended dose and duration, specified withdrawal/withhold time, route of administration. Cow-specific information should be located on cow-specific treatment record (animal ID, date treated, name of treatment, disease/condition being treated). Dosage, duration, disease/condition, withdrawal/withhold time should be specified if deviating from master protocol. <b>(n = 208)</b></p> | <p><b>55%</b></p> <ul style="list-style-type: none"> <li>• Agreement with the rationale provided</li> <li>• Much appreciated clarification</li> <li>• Offers flexibility for veterinarians and producers</li> <li>• Reduces confusion and simplifies</li> </ul>  | <p><b>33% / 12%</b></p> <p>Clarity:</p> <ul style="list-style-type: none"> <li>• Define permanent</li> <li>• Confusion around what is changing/what is being added</li> </ul> <p>Record-Keeping Burden:</p> <ul style="list-style-type: none"> <li>• More time consuming for farmers</li> <li>• Treatment protocols on organic farms are already a challenge</li> <li>• Unnecessary, repetitive, onerous</li> <li>• Too much paperwork</li> </ul>   |

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| Current V4 Standard   | Proposed Recommendation<br>(# of people that voted)  | Votes & Sentiments  |   |
|---|--|---|---|
|   |  | Supportive  | Neutral / Unsupportive  |
| <b>Topic 5: Written Protocols</b>   |  |   |   |
| All written protocols are translated into languages understood by family and non-family employees with animal care responsibilities. (MCAP)   | Clarify expectation to only translate protocols for roles that employees have responsibilities for. Keep language of the standard as is but include the guidance as only those protocols for which a given employee has responsibilities must be available in a language that is understood. (n = 203) | <b>65%</b> <ul style="list-style-type: none"> <li>Agreement with the rationale provided</li> <li>Good clarification</li> <li>Important and logical</li> </ul>   | <b>25% / 11%</b> <p>Concern Over Application</p> <ul style="list-style-type: none"> <li>Many employees are illiterate &amp; need verbal training</li> <li>Overcomplicated and impractical</li> </ul> <p>Need for Support:</p> <ul style="list-style-type: none"> <li>Resources for translation should be provided</li> <li>Need support in creating training materials</li> </ul> <p>Desire for More:</p> <ul style="list-style-type: none"> <li>All protocols should be in native languages, not just applicable ones</li> </ul> |
| <b>Topic 6: Continuing Education</b>  |  |   |   |
| <p>All family and non-family employees with animal care responsibilities have an <b>annually signed cow care agreement</b>. (MCAP-Non-family; CIP-Family)</p> <p>All family and non-family employees with animal care responsibilities have <b>documented annual continuing education in proper stockmanship</b> (animal handling and restraint for all age classes of animals). (MCAP-Non-family; CIP-Family)</p> <p>All family and non-family employees with pre-</p> | Maintain no continuing education standard for antimicrobial stewardship be established. (n = 201)  | <b>73%</b> <ul style="list-style-type: none"> <li>Agreement with the rationale provided</li> <li>Already happening on farms and covered in the VCPR</li> <li>Should be left up to the farmer and the vet</li> <li>Not in the responsibilities of the farmer native languages, not just applicable ones</li> </ul> | <b>24% / 3%</b> <p>Desire for More:</p> <ul style="list-style-type: none"> <li>Farmers and vets should be educated on this</li> <li>AMU needs to be reduced and training should be required</li> </ul>  |

**National Dairy FARM Program**



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|---|--|---|--|
| <p>weaned calf management responsibilities <b>have documented annual continuing education on the written pre-weaned calf management protocol</b> (MCAP-Non-family; CIP-Family)</p> <p>All family and non-family employees with non-ambulatory animal management responsibilities <b>have documented annual continuing education on the written non-ambulatory animal management protocol.</b> (MCAP-Non-family; CIP-Family)</p>   | <p>Place guidance in the animal care manual that advises farmers that best practice is to request that service providers sign a Cow Care Agreement and have CE on services that are provided on the farm but not establish a standard to that effect. <b>(n = 201)</b></p> | <p><b>43%</b></p> <ul style="list-style-type: none"> <li>• Agreement with the rationale provided</li> <li>• Agree that this is important and should be a recommendation but not a requirement</li> </ul>                                      | <p><b>42% / 15%</b></p> <p>Desire for More:</p> <ul style="list-style-type: none"> <li>• All individuals having contact with animals should sign a cow care agreement</li> <li>• Should be required</li> </ul> <p>Clarity:</p> <ul style="list-style-type: none"> <li>• Confusion over what was being proposed</li> </ul>  |
| <p>All family and non-family employees with euthanasia responsibilities have <b>documented annual continuing education on the written euthanasia protocols, identification of animals that are to be euthanized and proper euthanasia techniques.</b> (MCAP-Non-family; CIP-Family)</p> <p>All family and non-family employees with determination of fitness to transport responsibilities have <b>documented annual continuing education on the written protocol for fitness to transport.</b> (MCAP-Non-family; CIP-Family)</p> | <p>Update action plan for family and non-family employees to receive an MCAP for not meeting CE requirements. <b>(n = 312)</b></p>   | <p><b>44%</b></p> <ul style="list-style-type: none"> <li>• Agreement with the rationale provided</li> <li>• Equal expectations for family and non-family is preferred and less confusing</li> <li>• Follows continuous improvement</li> </ul> | <p><b>30% / 26%</b></p> <p>Clarity:</p> <ul style="list-style-type: none"> <li>• Define “family”</li> <li>• Provide examples and clarity around what constitutes CE</li> </ul> <p>Concerns Over Implementation / Burden:</p> <ul style="list-style-type: none"> <li>• Unnecessary and offensive to lifelong farmers</li> <li>• Difficult for small farms and Amish/Mennonite</li> <li>• Family employees already know the protocols</li> <li>• Adds unnecessary work for farmers</li> </ul> <p>Preference for No Change:</p> <ul style="list-style-type: none"> <li>• CIP is enough</li> </ul> |

**National Dairy FARM Program**



| Current V4 Standard  | Recommendation<br>(# of people that voted)   | Votes & Sentiments   |  |
|--|--|--|--|
|  |  | Supportive   | Neutral / Unsupportive   |
| <b>Topic 7: Fitness to Transport</b>   |  |  |  |
| <p>All family and non-family employees with determination of fitness to transport responsibilities have documented annual continuing education on the written protocol for fitness to transport. (MCAP-Non-family; CIP-Family)</p> <p>The facility has an effective written protocol for fitness to transport that includes the definition of animals that are eligible to be marketed and outlines adherence to milk and meat withdrawal times. (MCAP)</p>  | <p>“All age classes” will be added to the standard for Fitness to Transport. (n = 197)</p>   | <p><b>68%</b></p> <ul style="list-style-type: none"> <li>• Agreement with the rationale provided</li> <li>• This is an improvement and a positive clarification</li> <li>• Very important area of animal care</li> <li>• Industry spotlight on this topic</li> </ul> | <p><b>21% / 10%</b></p> <p>Challenges Evaluating:</p> <ul style="list-style-type: none"> <li>• Subjective</li> </ul> <p>Impact of Changes:</p> <ul style="list-style-type: none"> <li>• May increase euthanasia</li> <li>• Unfit animals should be allowed to transport for specific instances</li> </ul> <p>Record-Keeping Burden:</p> <ul style="list-style-type: none"> <li>• Too many protocols - becoming redundant</li> </ul> <p>Desire for More:</p> <ul style="list-style-type: none"> <li>• Concerns about long shipping timelines for young animals</li> <li>• Request for specific requirements for fitness to transport</li> <li>• Should be MCAP</li> </ul> |
| <b>Topic 8: Non-Ambulatory Animals</b>   |  |  |  |
| <p>The written herd health plan has a written protocol for non-ambulatory animal management that includes language specific to areas of non-ambulatory animal management</p> <p>Non-ambulatory animals are moved using proper methods, including the use of special equipment. (MCAP)</p> <p>Non-ambulatory animals are provided prompt medical care. (MCAP)</p> <p>Non-ambulatory animals are provided access to feed, water, protection from heat and cold for typical climatic conditions, isolation from other ambulatory animals and protection from predators. (MCAP)</p> <p>Facilities are designed to have a location to segregate weak, sick or injured animals</p> <p>The location for weak, sick or injured animals provides animals with: feed, water, protection from heat and cold for typical climatic conditions, isolation from other ambulatory animals and protection from predators.</p> | <p>Clarification that forks with a supportive base can be used but lifting a cow only with forks (i.e., no supportive base) is unacceptable. (n = 196)</p> | <p><b>75%</b></p> <ul style="list-style-type: none"> <li>• Agreement with the rationale provided</li> <li>• Good clarification</li> <li>• Additional clarification and/or training would be useful</li> </ul>  | <p><b>18% / 7%</b></p> <p>Adds Unnecessary Complication:</p> <ul style="list-style-type: none"> <li>• Complicates simple tasks</li> </ul> <p>Potentially Prohibitive:</p> <ul style="list-style-type: none"> <li>• Can be impractical depending on how the cow is positioned</li> <li>• Will save the animal any way that they are able</li> <li>• May increase instances of euthanasia</li> </ul>   |

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|--|---|--|---|
|  |   | Supportive   | Neutral / Unsupportive  |
| <b>Topic 9: Euthanasia</b>   |   |  |   |
| <p>All family and non-family employees with euthanasia responsibilities have documented annual continuing education on the written euthanasia protocols, identification of animals that are to be euthanized and proper euthanasia techniques. (MCAP-Non-family; CIP-Family)</p> <p>The written herd health plan has a written protocol for euthanasia that includes language specific to areas of euthanasia.</p> <p>Criteria for identification of animals to be euthanized are established. (MCAP)</p> <p>Euthanasia techniques follow the approved methods of AABP and/or AVMA. (MCAP)</p> <p>Carcass disposal is conducted using the appropriate method in accordance with applicable local ordinances (MCAP)</p> | <p>The dairy farm must list primary provider for euthanasia as well as a secondary provider in the case that the primary is not available within the euthanasia protocol. If an off-farm service provider will be used to provide euthanasia services, someone on farm must be trained in euthanasia. (n = 310)</p>   | <p><b>55%</b></p> <ul style="list-style-type: none"> <li>Agreement with the rationale provided</li> <li>Euthanasia is seen as a risk to dairy farm reputation, so this is useful</li> <li>Thought to be a good idea</li> <li>Critical for farms</li> </ul> | <p><b>28% / 17%</b></p> <p>Clarity:</p> <ul style="list-style-type: none"> <li>Small farms will have trouble meeting this (i.e. sole producer)</li> <li>More guidance is needed</li> <li>Unclear how it is being implemented</li> </ul> <p>Record-Keeping Burden:</p> <ul style="list-style-type: none"> <li>Too much paperwork</li> <li>Perceived as unnecessary</li> <li>Overreaching, redundant</li> </ul>   |
|  | <p>Euthanasia protocol standard to add “confirmation of death” to read as: “Does the written herd health plan include a written protocol for euthanasia that includes language specific to euthanasia method and confirmation of death that aligns with the approved guidelines from AABP and/or AVMA”. (n = 307)</p> | <p><b>60%</b></p> <ul style="list-style-type: none"> <li>Agreement with the rationale provided</li> <li>Critical need</li> <li>Risk to the industry if not done</li> <li>More training materials on this would be useful</li> </ul>                        | <p><b>26% / 14%</b></p> <p>Clarity:</p> <ul style="list-style-type: none"> <li>Unclear on how this should be done</li> <li>Undefined, confusing, vague</li> </ul> <p>Perceived as Unnecessary:</p> <ul style="list-style-type: none"> <li>Current criteria are sufficient</li> <li>Not necessary if properly trained in euthanasia</li> <li>Farmers should be trusted to operate on their own farm</li> <li>Minimize the number of MCAPs issued for euthanasia-related practices</li> </ul> |

**National Dairy FARM Program**



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|---|---|---|--|
|   |   | Supportive  | Neutral / Unsupportive   |
| <b>Topic 10: Facilities</b>   |   |   |  |
| All age classes of animals have a method of daily exercise (weather permitting, if outdoors). | No change to existing daily exercise standard (n = 189)   | <p><b>70%</b></p> <ul style="list-style-type: none"> <li>Agreement with the rationale provided</li> <li>Keeps the program facility neutral &amp; non-prescriptive</li> <li>Definition of daily exercise would be useful</li> </ul>    | <p><b>20% / 10%</b></p> <p>Clarity:</p> <ul style="list-style-type: none"> <li>Questions about how this is to be implemented on tie-stall facilities</li> <li>Define exercise and weather permitting</li> <li>Should apply to all facilities, including tie stall facilities</li> </ul> <p>Desire for More:</p> <ul style="list-style-type: none"> <li>Cows should have pasture access</li> <li>This is a critical ask and the expectations should be updated</li> </ul> |
|   | No standard established around stocking density (n = 193) | <p><b>69%</b></p> <ul style="list-style-type: none"> <li>Agreement with the rationale provided</li> <li>Using animal based measures to assess this is a better assessment</li> <li>Should be left up to the farmer and vet</li> </ul> | <p><b>17% / 14%</b></p> <p>Desire for More:</p> <ul style="list-style-type: none"> <li>This issue should be addressed and explored further</li> <li>Stocking density is a huge industry problem and should require a standard</li> <li>Overstocking has adverse animal health and welfare effects</li> <li>A standard is necessary and supported by science</li> <li>This is a risk area for the industry</li> </ul>   |
|   | No standard modification for water access (n = 191)       | <p><b>76%</b></p> <ul style="list-style-type: none"> <li>Agreement with the rationale provided</li> <li>Currently, no good animal based measures to assess this in a better way</li> </ul>  | <p><b>16% / 7%</b></p> <p>Challenges to Implement:</p> <ul style="list-style-type: none"> <li>3 days is too early, calves don't drink water at day 3</li> <li>Already covered under calf standards</li> <li>Difficult for many farms</li> <li>Challenging in winter</li> </ul> <p>Desire for More:</p> <ul style="list-style-type: none"> <li>Should be enforced from day 1</li> </ul>   |

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|--|---|--|---|
|  |   | Supportive   | Neutral / Unsupportive  |
| <b>Topic 11: Handling</b>  |   |  |   |
| <p>All family and non-family employees with animal care responsibilities have an annually signed cow care agreement. (MCAP-Non-family; CIP-Family)</p> <p>All family and non-family employees with animal care responsibilities have documented annual continuing education in proper stockmanship (animal handling and restraint for all age classes of animals). (MCAP-Non-family; CIP-Family)</p> | <p>Guidance to be included regarding acceptable stockmanship and handling approaches. (n = 191)</p> | <p><b>63%</b></p> <ul style="list-style-type: none"> <li>• Agreement with the rationale provided</li> <li>• More information/guidance is helpful</li> <li>• Can be useful for continuing education</li> <li>• Requests for short videos in multiple languages &amp; guidance on using tails to move animals</li> </ul> | <p><b>27% / 10%</b></p> <p>Clarity:</p> <ul style="list-style-type: none"> <li>• How will this be evaluated?</li> <li>• The current standard is sufficient</li> <li>• What is considered appropriate training?</li> </ul> <p>Perceived as Unnecessary:</p> <ul style="list-style-type: none"> <li>• Annual renewals are unnecessary</li> <li>• These skills come with experience</li> <li>• Should not be expected of experienced farmers</li> <li>•</li> </ul> |

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|--|---|--|--|
|  |   | Supportive   | Neutral / Unsupportive   |
| <b>Topic 12: Program Management</b>  |   |  |  |
| <p><b>Animal Observation Scoring:</b><br/>≤ 100 animals in any age category: score all animals</p> <p>&gt; 100 animals in a given age category, score 100 animals from as few pens as possible</p> | Sampling protocol will not be adjusted (n = 189)  | <p><b>61%</b></p> <ul style="list-style-type: none"> <li>Agreement with the rationale provided</li> </ul>  | <p><b>26% / 12%</b></p> <p>Farm Size Concerns:</p> <ul style="list-style-type: none"> <li>Disproportionately unfair to small farms</li> <li>100 animals is not representative of large farms</li> </ul> <p>Clarity:</p> <ul style="list-style-type: none"> <li>Unsure the reasoning behind the sampling protocol</li> </ul> <p>Desire for More:</p> <ul style="list-style-type: none"> <li>Should assess all pens to be more representative</li> <li>Should use percentage to be facility size neutral</li> </ul>  |
| <p><b>Action Plan Timelines:</b><br/>Immediate Action Plan- max 48 hours</p> <p>Mandatory Corrective Action Plan- max 9 months</p> <p>Continuous Improvement Plan- max 3 years</p>                 | Existing timelines for corrective actions to be maintained. (n = 191)   | <p><b>66%</b></p> <ul style="list-style-type: none"> <li>Agreement with the rationale provided</li> <li>Timelines work well</li> <li>Evaluators have the discretion to adjust if needed</li> </ul>   | <p><b>27% / 7%</b></p> <p>Evaluator Authority:</p> <ul style="list-style-type: none"> <li>Evaluators should not be able to shorten timelines</li> </ul> <p>Proposed Timeframe Changes:</p> <ul style="list-style-type: none"> <li>MCAP: suggestions from 3 to 9 months</li> <li>CIP: suggestions from 1 to 3 years</li> <li>IAP: suggestions from 48hrs to 7 days</li> </ul> <p>Focus on Risk:</p> <ul style="list-style-type: none"> <li>Corrective action timelines should be risk based</li> </ul>  |
|  | Farms that have significant issues will be flagged for further investigation into a discovery of what is happening in that situation. This will not automatically trigger a Willful Mistreatment Protocol. The point at which the discovery process is triggered is yet to be determined by an established working group. (n = 192) | <p><b>47%</b></p> <ul style="list-style-type: none"> <li>Agreement with the rationale provided</li> <li>Agreement that this is useful &amp; protects animals and farmers</li> <li>Useful in eliminating grey areas for evaluators</li> </ul> | <p><b>39% / 14%</b></p> <p>Clarity:</p> <ul style="list-style-type: none"> <li>Unclear what this will look like, so many were uncomfortable giving clear sentiment on the issue</li> <li>General agreement with this but more details are requested</li> </ul> <p>Desire for Less and More:</p> <ul style="list-style-type: none"> <li>Should be handled between the farm and their co-op, evaluator, and advisors</li> <li>Should trigger more than a conversation (e.g., immediate action plan, willful mistreatment protocol, decertification)</li> </ul> |

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