



American Veterinary Medical Association  
Attn: Dr Janet D. Donlin, Executive Vice President and CEO  
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April 22, 2020

Dear Dr. Donlin

**Reference: Urging AVMA to address cruel depopulation methods**

We are writing to urgently request a conversation about two methods currently permitted in the AVMA Guidelines for the Depopulation of Animals, 2019 Edition, and the need for these inhumane methods to be immediately removed from the guidelines.

Ventilation shutdown (VSD) and water-based foam should never be used to cull or 'euthanize' farmed animals. Both methods are inhumane as they fail to ensure immediate unconsciousness and insensibility or immediate death without distress. Instead, they cause distress and extreme suffering via prolonged heat stress or conditions for suffocation and often further delays with practical complications.

Stressful conditions and management of animals can increase shedding and spreading of infectious agents. It is in the best interest of disease control to conduct humane practices that include low stress, minimal or efficient animal handling, and a rapid and painless death.

As producers in the U.S. face numerous current and potential disruptions including the following: processing shutdowns that inhibit the slaughter of grown animals for the food supply, as seen in the case of Delmarva Poultry; avian flu outbreaks, such as the one in South Carolina earlier this month; the risk of African Swine Fever entering the U.S. hog industry; as well as additional disease risks exacerbated by intensive confinement conditions. It is imperative that they employ only humane methods of depopulation.

Given that the industry looks to the AVMA for guidance, there is an obligation to publicly oppose the use of VSD and water-based foam to signal to industry and government that these methods should be prohibited. The World Organisation for Animal Health (OIE) guidelines<sup>1</sup> for killing for disease control do not permit either method, and the AVMA should strive to align with international precedent wherever possible.

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<sup>1</sup> World Organisation for Animal Health, Article 7.6.10, available at [https://www.oie.int/index.php?id=169&L=0&htmfile=chapitre\\_ow\\_killing.htm](https://www.oie.int/index.php?id=169&L=0&htmfile=chapitre_ow_killing.htm).

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We were known as **WSPA**  
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Protection of Animals)



We ask that the AVMA immediately revise its guidelines or issue a public statement recommending against the use of VSD and water-based foam for livestock depopulation, and to provide instruction to farmed animal producers on the humane depopulation methods that must be practiced instead, before further mass culling occurs in response to current or predicted labor shortages or animal disease outbreaks.

Specifically, we request that the AVMA:

- Remove ventilation shutdown (VSD) from the list of "Permitted in constrained circumstances" depopulation methods for all relevant species from the AVMA Guidelines for the Depopulation of Animals. In VSD, the animals die of hyperthermia, usually suffering from heat stress. The process is distressing and painful, and it can take hours for animals to die. There is scientific consensus that VSD (with or without accelerating inputs) causes serious negative welfare impacts.<sup>2</sup> And there is no evidence to support the effectiveness to depopulate whole house poultry or swine. Even after prolonged exposure to high temperature, the efficacy of causing death is still not guaranteed, and modeling has shown that some chickens can still be alive after more than three hours from the start of VSD.<sup>3</sup>
- Remove water-based foam from the list of "Preferred" and list of "Permitted in constrained circumstances" depopulation methods for all relevant species from the AVMA Guidelines for the Depopulation of Animals. Water-based foam obstructs the animal's airway, which is extremely stressful and similar to drowning or suffocation.<sup>4</sup> Research on the efficacy and welfare implications of water-based foam is limited, though one study documented a time to death of more than ten minutes for ducks.<sup>5</sup>
- Make the removal of these methods public through either a revision of the guidelines or official statement and recommend against their use by producers moving forward.
- Reinforce for producers that humane depopulation methods are available that should be followed when depopulation is absolutely necessary. In particular, World Animal Protection and OIE support the following when humane handling protocols are followed:
  - For pigs:
    - Penetrating Captive Bolt (PCB)
    - Free bullet

<sup>2</sup> Keegan, D. Mass depopulation. 2018. Advances in Poultry Welfare. DOI: <http://dx.doi.org/10.1016/B978-0-08-100915-4.00017-8>

<sup>3</sup> Zhao, Yang, Hongwei Xin, and Lihua Li. "Modelling and validating the indoor environment and supplemental heat requirement during ventilation shutdown (VSD) for rapid depopulation of hens and turkeys." *biosystems engineering* 184 (2019): 130-141.

<sup>4</sup> See <https://awionline.org/sites/default/files/uploads/documents/FAAWI-Comment-birdfluEA-Oct2015.pdf> citing Raj ABM, Smith C, and Hickman G. 2008. Novel method for killing poultry in houses with dry foam created using nitrogen. *Veterinary Record*, 162: pp. 722-723.

<sup>5</sup> See <https://awionline.org/sites/default/files/uploads/documents/FAAWI-Comment-birdfluEA-Oct2015.pdf> citing Benson, ER et al. 2009. Use of water-based foam to depopulate ducks and other species, *Poultry Science*, 88: pp: 904-910.



- Two-stage electric stunning (Three second to the head followed by three second to the heart)
- Mixed gasses that include Nitrogen or Argon in addition to CO<sub>2</sub>
- Pharmaceutical-grade euthanasia agents
- For poultry:
  - CO<sub>2</sub> or mixed gasses in partial houses (for chicken only)
  - Electrical water bath
  - Nitrogen-filled high expansion foam
  - Poultry-suitable captive bolt (for large species, e.g., turkey)
- For cattle:
  - All OIE recommended procedures are acceptable
- Support specific research into the suitability of nitrogen-filled high expansion as a humane depopulation method for the U.S. hog and poultry industries. This method rapidly reduces the oxygen in the atmosphere to below two percent, which is proven to be effective in creating a non-aversive anoxia state and rapid death of the animals. Case studies have shown this method to be practical for large, floor-reared broiler farms, and current developments are exploring container customization to enable on-farm use for larger animals.

We request a meeting at your earliest convenience to discuss all of the above methods in further detail and strategies for ensuring that depopulation of farmed animals, when necessary, is managed using humane handling and killing methods only.

We look forward to hearing from you.

Sincerely,

Alesia Soltanpanah  
Executive Director  
World Animal Protection US

CC:

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