

Dr. Nancy Halpern, Director
Division of Animal Health
New Jersey Department of Agriculture,
P.O. Box 330,
Trenton,
New Jersey 08625-0330

25th June 2003

Dear Dr. Halpern,

I have heard that the New Jersey Department of Agriculture (NJDA) is legally required to produce standards for the humane treatment of farm animals. I am very concerned that NJDA fails to acknowledge that many routine animal production practices are not humane. By accepting these practices, NJDA will be condoning cruel and inhumane treatment of farm animals - the very thing it is trying to outlaw. It is my hope that by giving you a few examples of current practices that are, without doubt, inhumane, you will reconsider your standards.

Forced molting of laying hens is a practice whereby hens at the end of a laying year are forced into molt by depriving them of food for up to 14 days. It is claimed that this mimics what happens in nature. Nothing could be further from the truth. This is a barbaric practice which doubles mortality in the flock while it is going on and leads to great suffering in all the hens involved. Forced molting by food deprivation has been banned in Europe and should be banned elsewhere. Anyone inflicting such treatment on any other species e.g. dogs or cats would immediately be prosecuted under cruelty to animals legislation.

De-beaking or beak trimming of laying hens is routinely carried out to prevent feather pecking and cannibalism. However it has been shown (by me and by others) to cause both acute and chronic pain and should not be allowed to be carried out routinely. It has been banned in some European countries and they have shown that it is possible to keep hens without de-beaking them.

Battery cages for laying hens have been shown (by me and by others) to cause extreme frustration particularly when the hen wants to lay an egg. Battery cages are being phased out in Europe and other more humane husbandry systems are being developed. New Jersey should take the lead in the U.S. and phase out battery cages in favor of more humane systems.

"Dry sow stalls" is the common way to keep gestating sows in North America. This husbandry system leads to enormous suffering in sows in terms of frustration and boredom. Sows are highly intelligent animals with a desire to explore their environment and engage in a rich repertoire of social interactions. All this is denied them when they are kept in stalls. Europe has decided to phase out sow stalls on welfare grounds; NJDA should do the same.

The routine method of producing veal from calves is to keep them in crates without bedding and to feed them a milk or milk substitute diet until they reach slaughter weight at about 16 weeks of age. This again is extremely cruel. The calves are marginally anemic throughout their lives because their diet is deficient in iron. This causes suffering and leads them to develop depraved appetites. Because they are not allowed access to roughage, the development of the rumen is impaired and this leads to suffering. All young animals have a need to explore their environments, play, and engage in social interactions. All this is denied veal calves kept in crates and causes great suffering.

These are just a few examples of "routine animal agriculture practices" that are cruel and inhumane and should be banned or phased out. I urge you to reconsider your standards and draw up new ones that really do protect the welfare of the animals involved.

I should tell you that I am a long-established animal welfare scientist. I started carrying out research into the welfare of laying hens kept in battery cages in 1965 at the Poultry Research Centre in Edinburgh and can therefore be considered as the first person to investigate animal welfare in a scientific way. I worked for over 20 years at the Poultry Research Centre (now the Roslin Institute, home of Dolly the cloned sheep) on various aspects of welfare in domestic fowl. In 1989 I emigrated to Canada and hold the oldest Chair in Animal Welfare in North America. I have continued to carry out research at the University of Guelph into the welfare of farm animals for the past 14 years. I have published more than 150 papers in scientific journals on the topic of farm animal welfare.

Yours sincerely,

Ian J.H. Duncan
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Chair in Animal Welfare
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