

The logo for World Animal Protection is a circular emblem. It features a white center with the text "WORLD ANIMAL PROTECTION" in black, bold, sans-serif font. The center is surrounded by a thick black ring. At the top and bottom of the ring are small orange triangles pointing towards each other.

WORLD  
**ANIMAL**  
PROTECTION

A close-up photograph of a cow's face, showing its eye, ear, and nose. The cow has black and white patches. The background is a blurred barn interior.

# Milking the cow

The fate of Canadian cull dairy cows



# Introduction

There are almost 10,000 dairy farms in Canada with an average size herd of 96 cows per farm.<sup>1</sup> Over 32% of dairy cows (about 198,000 cows) are removed (“culled”) from dairy herds each year in Canada.<sup>2</sup>

“Culling” refers to the process of removing an animal from the herd due to health or reproductive problems, or reduced milk production. Culling may be “voluntary” (economic) – if a cow is no longer productive – or “involuntary” (biological) – in the case of illness or injury. The latter may include lameness, general sickness, or other painful conditions such as mastitis (infection of the udder) or injury to the udder or teats. Government of Canada records indicate these are the most common reasons cows are removed from the herd, in addition to reproductive problems and low milk production, which could themselves be caused by a systemic health issue.<sup>2</sup> Some aspects of dairy production may increase the prevalence of certain health problems that lead to culling such as cows being bred for high milk production and/or lack of pasture access, the latter being associated with a higher incidence of lameness.<sup>3</sup>

Once the decision is made to cull a cow, she will be sent to slaughter either through an auction to be sold (the most common route) or shipped directly to the slaughter plant. In North America, limited local slaughter options means cull cows are typically sent to slaughter via transport to an auction or sales barn where they are bought by abattoir representatives and transported to slaughter from there. Some may be sent to multiple auctions or assembly yards, or simply wait for days at an auction where the environment can be noisy, animals are roughly handled, and food and water are scarce. Lactating cows are not milked, a necessity for preventing engorged, painful udders. It could be days from the time an animal leaves the farm to when she arrives at a slaughter plant.<sup>4</sup> Researchers from the University of British Columbia (UBC) found, on average, cows spent 82 hours – about 3.5 days – in the system before being slaughtered.<sup>5</sup> In some cases, the time from farm to slaughter is as much as 7-10 days.<sup>6</sup> For a fragile cull dairy cow, it is likely she will deteriorate substantially with no intervention or treatment taking place during this period.<sup>7,8</sup> Research shows cull cows from Newfoundland are being slaughtered in Ontario – a distance of 2,500 km, and cull cows from Quebec have been identified in British Columbia slaughterhouses – a distance of 4,500 km.<sup>9,10</sup>



**Top photo:** Cows in transport, Ontario.  
Credit: Louise Jorgensen / Animal Sentience Project / We Animals Media  
**Bottom photo:** Cows from Quebec auction.  
Credit: Existence / We Animals Media



Many cull cows from Canadian farms are also shipped to slaughter plants in the U.S.<sup>6</sup> Freedom of Information (FOI) records from the U.S. government indicate there are 18 slaughterhouses in the U.S. that take Canadian cull cows for slaughter, some as far away as Texas (United States Department of Agriculture, Email, July 31, 2021 and Email, August 13, 2021).

Transportation is a particularly stressful time for all cattle, regardless of their health status.<sup>11</sup> Given the geographic size of Canada and the United States, the duration cull dairy cows

may be transported is long and an important risk factor that contributes to their deterioration. Once they leave the farm, cull cows are at increased risk of suffering from compromised health or becoming unfit (non-ambulatory, lame, wounded or dying) when transported on multiple journeys or for long-distances, as is often the case in Canada given the structure of the marketing system for cull cows and the limited or specialized options for slaughter.<sup>6</sup> Studies have shown that the most prominent risk factors for many of these outcomes are lengthy shipping times (>30 h), long distances (>400 km), ambient temperatures above 20 Celsius, and high-stocking density.<sup>9,12,13</sup> Even short journeys can have severe consequences for these vulnerable animals. A study of cull dairy cow transport in Denmark found relatively short journeys of less than eight hours resulted in the animals' health significantly deteriorating as indicated by increased lameness and wounds, and reduced body condition (thinness).<sup>11</sup> The routes in this study did not include any stops at auctions and were much shorter compared to the distances most Canadian cull cows are transported.

Upon arrival at an auction, cows will be exposed to novel environments, mixed with unfamiliar animals, segregated in a sales ring, experience handling by unknown people, and may wait extended periods before being sent to slaughter.<sup>7,9</sup> In Canada, markets rarely provide food and water for the animals passing through. These circumstances can be stressful and can contribute to a decline in the health and fitness of cull cows from farm to slaughter, leading to unnecessary suffering. For these reasons, the use of livestock markets is declining in the European Union but remains common in the United States and Canada.<sup>14,15</sup>

Best practice mandates that producers assess animals for 'fitness for transport', meaning animals should be healthy enough to withstand the stress of transport without deteriorating or becoming compromised on the journey. In many cases, cull dairy cows are either not fit for transport or only fit enough to withstand short journeys. If a cow's condition is advanced, a more appropriate and humane option is on-farm emergency slaughter (OFES), euthanasia or local slaughter.<sup>16</sup> These options, however, are not usually considered, and, as research indicates, cows are often shipped when they are compromised suggesting many farmers poorly assess animals for 'fitness for transport'. A mitigating factor may be that most farmers are not aware of the long-distance journey involved in getting their animals to slaughter.<sup>7,17</sup>

Numerous studies have reported a high prevalence (more than 20%) of health conditions (moderate to severe lameness, mastitis, poor body condition) among cattle observed at auction yards in the United States and Canada,<sup>5,7,17,18</sup> suggesting decision-making around fitness for transport at the farm level needs improving.<sup>7</sup> A 2018 University of Guelph study found cows were being transported and sold at Ontario auctions in "less than optimal condition" – 40% of cows were thin or emaciated, 72% had difficulty walking and 27% had severe hock injuries.<sup>18</sup> Similarly, research at UBC found that 10% of the cows were very thin (Body Condition Score BCS ≤2), 7% were severely lame (locomotion score ≥4), 13% had engorged or inflamed udders and 6% had other "quality defects" including abscesses, injuries, and signs of sickness (e.g., pneumonia). The compromised cows in these studies were shipped against industry best practices.<sup>7</sup>

At the time of these studies, federal regulations prohibited the transport of animals that are sick or injured, but the regulations lacked clear definitions and interpretive guidance. In 2022, changes to the federal regulations now provide definitions for 'compromised animals', prohibiting them from being transported except for veterinary care or directly to a location where they will be humanely killed.<sup>19</sup> The new regulations also provide guidance on assessing animals for transport, requiring producers and transporters to consider whether an animal can withstand the challenges of transport and all that it entails (multiple stops, loading and unloading, exposure to unfamiliar animals, exposure to unknown people). However, it remains to be seen if the updated regulations will improve the welfare of cull cows. Government of Canada inspection reports received from 2018 and 2019 suggest inspections are infrequent and indicate inconsistent enforcement, shoddy record-keeping and staffing challenges.<sup>10</sup> Moreover, gaps in legislative oversight, such as animal welfare protections for animals at auction and sales barns in most provinces, mean many animals will continue to suffer in the system.

Unless otherwise noted, photos are  
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Cover photo: Cow at a Quebec auction.  
Credit: Julie LP / We Animals Media



**Photo:** Emaciated cow in transport  
Credit: Louise Jorgensen / Animal Sentience Project /  
We Animals Media

## Executive summary

Cull dairy cows are those animals removed from the milking herd and sent to slaughter. Many cows are afflicted with painful health conditions or injuries that compromise their welfare. Farmers are encouraged to assess animals for ‘fitness for transport’ before being shipped but research indicates many animals are being sent to slaughter in a compromised condition. Inspection reports obtained from the Canadian Food Inspection Agency (CFIA) also indicate regular occurrences of the inappropriate shipment of compromised or ‘unfit’ animals, with 24% of the vehicles inspected containing cull dairy cows with animal welfare concerns, including “downed” (non-ambulatory), lame and emaciated animals.<sup>10</sup>

The current marketing system for cull cows in Canada means many animals will be sent to auction to be sold and then further transported, sometimes long distances, to slaughter. Many animals will be sent to the U.S. as Canada has a limited number of slaughter plants that will accept cull dairy cows. Cows may languish at auctions for days with painful conditions, where they receive little if any, food, and water, and may

not be milked if they are lactating, leading to painful udder engorgement. Transport is a stressful time for all farm animals, even those that are strong and healthy. Because cull dairy cows are vulnerable animals, their welfare often deteriorates from the time they leave the farm to the time they reach the slaughter plant, especially given the lengthy time many spend in the system.

Increased actions are needed to prevent the suffering of dairy cows which include proactive culling, short journeys, local or on-farm slaughter options, euthanasia, improved regulations and enforcement, education initiatives and creating incentive and disincentive regimes. In recent years, efforts from the dairy industry to educate producers on the benefits of proactive culling, and the CFIA’s strengthening of the federal transport regulations are positive steps forward. Better enforcement of the regulations and other interventions will also be needed to ensure cull dairy cows are protected from needless suffering.



# Legislation and gaps in farm animal protection

Laws governing the treatment of cull dairy cows and other farm animals are a patchwork of federal and provincial statutes. Oversight for animals in transport is the responsibility of the federal government (CFIA) under the Health of Animals Regulations.<sup>19</sup> Protection of animals on farms falls to provincial governments, each of which has its own animal protection legislation. Six provinces have minimum standards for farm animal care that align with the requirements in the Codes of Practice.<sup>20</sup> The Codes of Practice are developed by multi-stakeholder committees under the National Farm Animal Care Council (NFACC). The updated draft Dairy Code of Practice released in 2021/2022 included a requirement that producers assess an animal's fitness for transport before she is loaded onto a transport truck. While the final code has not yet been released, this is likely to be included when the final Code is released in 2023.

The Canadian Food Inspection Agency (CFIA), through the *Health of Animals Regulations (HAR), Part XII (Transport of Animals)* regulates the treatment of animals during transport in Canada.<sup>21</sup> The regulations were updated in 2019 and went into force on February 20, 2022. In addition to shortening the 'food, water and rest' (FWR) intervals, there are now stricter rules for the transport of unfit and compromised animals, and the regulations include a 'Transfer of Care' (TOC) requirement, meaning anyone transporting animals for commercial purposes must keep records related to the movement of the animals (ID number, name, and address of the producers, last time the animal was given food & water, etc.) The TOC requirement intends to increase responsibility and accountability for an animal's welfare across all parties along the transport route since the responsibility for each animal is passed along as the animal changes hands. This is important since the CFIA inspection reports presented later in this report indicate that 'passing the buck' for the responsibility of animals found to be sick or injured was common.



**Photos:** Dairy cows with full udders at Ontario auction  
Credit: Louise Jorgensen / Animal Sentience Project / We Animals Media

The new regulations also provide an extensive list of conditions that would deem animals 'unfit' or 'compromised' and contain special provisions for transporting 'compromised' and 'unfit' animals. These provisions limit the transport of compromised animals without FWR to 12 hours and require that they be sent directly to slaughter. Unfit animals are not permitted to be transported except to receive care if recommended by a veterinarian. Compromised animals may be transported to the nearest place to receive care or be humanely killed and must not be sent to auctions or assembly yards. The regulations also contain rules for animals that become compromised or unfit during transport, stating that, "reasonable measures must be taken to prevent unnecessary suffering" and must be "transported to receive care, be humanely killed, or euthanized on the conveyance."

A contributing factor in the deterioration of cull cows during transport to slaughter is that most are sold through auctions. Except for Ontario and Quebec, there are few, if any, regular inspections at auctions and sales barns. Ontario is the only province that has a veterinary inspection system at auctions that is administered by the provincial ministry of agriculture.<sup>22a</sup> Within this system, animals that are sick or injured may be euthanized, or tagged for local slaughter, and the owner and/or trucker may be subject to investigation and fines related to the transport of compromised animals, but this practice does not exist in other provinces.<sup>22b</sup>

The revised HAR should help to reduce the transport of compromised or unfit animals once they leave the farm. The extent to which the regulations are or will be enforced remains a question. There is limited publicly available

information on the frequency of inspections conducted by CFIA regarding compliance with the HAR. Despite repeated attempts, information from the CFIA on the frequency and nature of inspections for humane transport was not forthcoming. For example, in response to an email query, the CFIA stated that inspections are conducted on a "risk-based frequency", but this was not defined (CFIA, Email, April 8, 2022). The CFIA also stated inspections occur at auctions and assembly yards, but this information has not been confirmed or validated by a third party. Reports received over a two-year period from an ATIP request presented in this report contained no records of inspections that had taken place at auctions or assembly yards.

Since activity on farms is outside CFIA's jurisdiction, the new regulations will have limited value in preventing producers from shipping compromised or unfit animals unless inspections are conducted or there is follow-up through the TOC documentation. Although the updated draft Dairy Code of Practice (to be released in 2023) included a requirement that producers assess animals'fitness for transport', it will be incumbent upon the dairy industry to ensure this requirement is being followed. Currently, the extent to which and how many producers follow the code is not known, nor is information about penalties for non-compliance, as this information is not publicly available.

The multi-jurisdictional nature of regulations and laws governing farm animal welfare and the gaps in oversight present a challenge and contribute to the poor welfare often experienced by cull dairy cows.<sup>9</sup> As a result of these issues, many animals that should not be sent to auction or transported, will fall through the cracks and will continue to deteriorate and suffer on the journey.

# Access to Information and Privacy requests – overview

World Animal Protection requested, via the *Access to Information and Privacy Act*, all inspection reports and forms concerning the welfare of cull dairy cows during transport and slaughter in 2018 and 2019 from the CFIA. The CFIA is the regulatory agency of the Canadian government responsible for safeguarding the welfare of animals during transport and slaughter and inspections are conducted with a view to enforce the HAR. The CFIA reports that it conducts inspections of animals arriving at slaughter plants in addition to auctions and random road checks (CFIA, Email, April 8, 2022).

The records received may not be the total number of inspection reports in the CFIA possession relating to cull dairy cows. Since the CFIA’s mandate is food safety first, animal welfare related transport inspections represent a small percentage of those conducted. Thus, it is likely there are many more violations than are reported here since inspections conducted by the CFIA are relatively infrequent. These documents are intended to provide a snapshot of the welfare problems experienced by cull dairy cows once they leave the farm.

As many end-of-life dairy cows are shipped to the U.S. for slaughter (there are currently 18 plants in the U.S. that accept cull cows), documents relating to the United States’ importation, interstate movement, and slaughter of Canadian cull dairy cows were also requested from the Animal and Plant Health Inspection Service (APHIS), an agency of the U.S. government, for the period January 1, 2016, to December 31, 2020. However, the only documents provided by APHIS were those records from 2019 and 2020 documenting trucks with live animals that were denied entry into the U.S. from Canada because animals were deemed unfit for slaughter. No information was provided to indicate if the vehicles denied entry was exhaustive or just a sample. It is likely a sample list only was provided given that information on just 49 vehicles in 2019 and 2020 were received. Inspection documents were also provided by the U.S. government but were not useful as most of the information contained on the forms was redacted.

## U.S. slaughter plants taking cull dairy cows from Canada

<b>ABF Packing</b>	Stephenville, TX
<b>American Beef Packers</b>	Chino, CA
<b>American Foods Group – Cimpl’s Inc.</b>	Yankton, SD
<b>American Foods Group – Gibbon Packing</b>	Gibbon, NE
<b>American Foods Group – Green Bay Dressed Beef</b>	Green Bay, WI
<b>American Foods Group – Long Prairie Packing</b>	Long Prairie, MN
<b>Cargill Beef Packers</b>	Fresno, CA
<b>Cargill Taylor Beef</b>	Wyalusing, PA
<b>Caviness Packing</b>	Hereford, TX
<b>Central Valley Meat Company</b>	Hanford, CA
<b>FPL Foods LLC</b>	Augusta, GA
<b>H&amp;B Packing</b>	Waco, TX
<b>JBS Green Bay</b>	Green Bay, WI
<b>JBS Omaha</b>	Omaha, NE
<b>JBS Plainwell</b>	Plainwell, MI
<b>JBS Souderton</b>	Souderton, PA
<b>JBS Tolleson</b>	Tolleson, AZ
<b>Lone Star Beef</b>	San Angelo, TX

# Description of documents received from the CFIA

The Canadian government sent World Animal Protection 276 documents: 86 Humane Transportation forms from 2018 and 190 from 2019 each representing inspection of a single vehicle (“consignment”), which could contain multiple animals. In some cases, the Humane Transportation forms had additional documents attached, including veterinary reports, Fitness for Transport forms, Inspection Non-Compliance Reports (INCR) and ante-mortem inspection cards linked to the same vehicle. Other documents received include 39 more Fitness for Transport forms (11 from 2018 and 28 from 2019), one Certificate of (carcass) Condemnation and two official inspectors’ statements. These appear to be associated with different vehicles than the

276 inspection reports. A Fitness for Transport form is filled out by a veterinary inspector only when an issue of non-compliance is observed regarding an animal’s fitness. In total, 318 documents were received.

It was not stated if the documents received accounted for all those inspections completed during the 2018-2019 period or only a selection of inspection reports. Surprisingly, no information about consignments in Nova Scotia, Newfoundland, and New Brunswick were received, which suggests only a sampling of inspection reports were provided.

## Summary of types of forms received from the CFIA

Unique consignments	2019	2018	Total
Humane Transportation Forms <i>(including supplemental documentation attached to the same consignment)</i>	190	86	276
Fitness for Transport Forms	28	11	39
Certificates of Condemnation	0	1	1
Official letters	0	2	2
<b>TOTAL CONSIGNMENTS</b>	<b>218</b>	<b>100</b>	<b>318</b>

Some identifying information on the forms was redacted, such as the names of the transport companies, the names of the slaughterhouses and their corresponding addresses. Unfortunately, photos of violations made by the inspectors or veterinarians or vet diagnoses, were almost always left out, though some photos were provided alongside the reports.





**Photo:** Dairy cow with full udder at Ontario livestock auction  
Credit: Louise Jorgensen / Animal Sentience Project / We Animals Media

### Inspection forms and reports have been classified under four categories:

- 1 **Acceptable** (no violations or problems)
- 2 **Acceptable, but with welfare problems**
- 3 **Unacceptable with follow-up action**
- 4 **Unacceptable without follow-up action**

All consignments that had an INCR, a Fitness for Transport form, an official inspector's statement or a Condemnation form were filed under category 3 'unacceptable with follow-up action'. If one of these three forms was completed, it indicated that action was, will or should be taken. Completion of these forms also means that the incident was filed. However, it does not necessarily imply that a penalty was issued, such as a monetary fine, suspension of licence or prosecution.

### Summary of findings from the federal inspection reports

Animal welfare inspections are documented on a Humane Transportation Form. On this form, the consignment must be rated "acceptable", "pending", "incomplete" or "unacceptable". Forms marked "unacceptable" and "incomplete" often had an INCR form attached.

Of the 276 Humane Transport forms, 261 (95%) were rated as 'Acceptable'. However, in 20 (7%) of these "acceptable" cases, the CFIA inspector had noted down one or more animal-welfare concerns. Most of these concerns were about the presence of a compromised cow onboard, trucks with an insufficient amount of bedding and cows that arrived "down" (meaning they

were unable to rise due to illness or injury). In some of these consignments, the welfare concerns noted were serious, yet the CFIA inspector still filed the case as "acceptable".

It is worth noting that the journey times indicated in the records only correspond to the last leg of the journey (e.g., from an auction or assembly yard to the slaughterhouse). In most cases, the total journey time, or time an animal spends in the system, is unknown. Thus, it is rarely known if the animal deteriorated on the journey or if she was shipped in a compromised state from the farm.


# Examples of consignments marked 'acceptable' with welfare concern

Below are examples of cases rated as "acceptable" along with the corresponding welfare concerns noted down by the inspector.


<p>Case 1 <b>One cow down, another dead and a third one collapsed</b></p> <p>Place of loading: Quebec auction</p> <p>Place of unloading: slaughterhouse in Ontario</p> <p>Journey time: 16 hours</p>	<p>Load of 32 cows. There was one downer cow that could not get up. A final attempt was made to get the downed cow up but its front legs were too weak and it was unable to rise. It was then euthanized. Another cow was dead on arrival. A third cow went down shortly after getting off the scale. She was euthanized after a check by the vet. The bedding was sufficient in quality, but in the top belly there were splashes of dry blood. Calculated that there was no overcrowding. It was decided that this incident would not proceed to an INQR.</p>
<p>Case 2 <b>Downer with heart murmur, drooling and heavy breathing</b></p> <p>Place of loading: unknown</p> <p>Place of unloading: slaughterhouse in Prince Edward Island</p> <p>Journey time: 3.5 hours</p>	<p>One cow was down on the trailer upon arrival but got up on her own within ~20 minutes. She was segregated in the front compartment and the driver was told by the farmer she had a heart murmur. Upon ante-mortem inspection, she appeared to be breathing heavily and drooling. She was stiff when she rose up but walked off the trailer on her own.</p>
<p>Case 3 <b>Cows with prolapse and bloody coats</b></p> <p>Place of loading: unknown</p> <p>Place of unloading: slaughterhouse in Prince Edward Island</p> <p>Journey time: 2 hours</p>	<p>One cow exited the trailer with a rectal prolapse and two other cows had blood on their coats. The cow with a prolapse was not segregated. I explained that a cow with a prolapse falls under the 'Compromised Animals Policy' and should only be transported with special provisions and should be segregated.</p>
<p>Case 4 <b>Lame cow not segregated</b></p> <p>Place of loading: unknown</p> <p>Place of unloading: slaughterhouse in Prince Edward Island</p> <p>Journey time: 2 hours</p>	<p>One cow was lame on left hind foot and was only slightly weight bearing. When standing still she was continuously holding that foot in the air. I spoke to the driver about requirement to segregate compromised animals when transporting them. I reiterated that this was the law, and he would be expected to segregate compromised animals in the future.</p>
<p>Case 5 <b>Two downers at arrival</b></p> <p>Place of loading: Ontario</p> <p>Place of unloading: slaughterhouse in Ontario</p> <p>Journey time: 2 hours</p>	<p>Two cows were down when the driver was unloading. There was no evidence that the two downers were compromised.*</p> <p>* From the Humane Transportation form, it is unknown if these animals were able to finally get up or what happened to them.</p>

# Examples of consignments marked 'unacceptable' with INCR

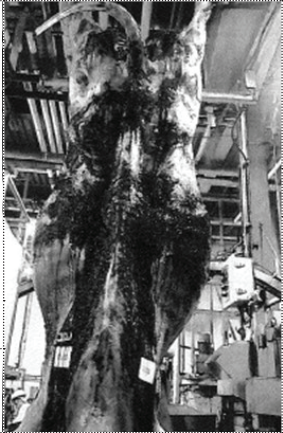
Twelve (4%) of the 276 consignments were marked 'unacceptable'. In nine of these 12 (75%), an Inspection Non-Compliance Report (INCR) was completed and attached to the Humane Transport form. In some cases, it was clear that a penalty was issued, but the details were absent from the documentation and thus the outcome remains unknown.

<p>Case 6</p> <p><b>Transport of severely emaciated downers</b></p>		<p>Cows all lying down at arrival. Two are severely emaciated (all bones are protruding) and weak. The whole carcass of one is condemned. Post-mortem inspection shows that the organs show signs of prolonged starvation. Concerns are raised about the farm where they came from.</p>
Place of loading:	unknown	
Place of unloading:	slaughterhouse in Quebec	
Journey time:	unknown	
<p> <b>Penalty/Action taken:</b></p>		None or unknown



<p>Case 7</p> <p><b>Downer covered in manure and shivering</b></p>		<p>Three culled dairy cows with six fat Angus cattle that were significantly heavier (500 pounds more) transported together without segregation as required by law. One culled cow (the smallest one) is in lateral recumbency trying to get up. She is covered in liquid manure and shivering. Her temperature is 35 degrees (38 is normal). I explained to the driver that the trailer should have been bedded as to properly soak up urine and loose manure. After approximately 45 minutes the downer cow did not get up and she was euthanized on the trailer. One of the other culled cows had a double pinched nerve and bloody scrape on her front hind leg, just above the hoof, causing her to be a compromised animal.</p>
Place of loading:	unknown	
Place of unloading:	slaughterhouse in Prince Edward Island	
Journey time:	2.5 hours	
<p> <b>Penalty/Action taken:</b></p>		Checked if the driver had a history of non-compliance, which he had. Details of any penalty are not known.




<b>Case 8</b> <b>Severe skin lesions due to limited headspace</b>		<p>Truck was over the maximum weight. Seven cows were transferred to another truck where the headspace was not adequate, resulting in their backs touching the ceiling. Five cows had severe skin lesions along the spine, hips and pins. All were slaughtered the same day of arrival.</p>	
Place of loading:	Quebec		
Place of unloading:	slaughterhouse in Prince Edward Island		
Journey time:	19.25 hours		
<b>Penalty/ Action taken:</b>		Fine of \$9,490 was levied. Company has a history of violations	

<b>Case 9</b> <b>Transport of severely emaciated cows</b>		<p>In a group of 13 cows, four were identified as emaciated with a body condition score of 15/9 and one with a body score of 2/9. All were retained for veterinary examination. All four cows were condemned ante-mortem due to emaciation. Another cow was condemned post-mortem for mastitis and septicemia.*</p> <p>* From the forms it is not clear if they were euthanized or passed through the slaughter process. Driver was interviewed and said he was "not aware of federal transport regulations."</p>	
Place of loading:	unknown		
Place of unloading:	slaughterhouse in Western Manitoba		
Journey time:	1.75 hours		
<b>Penalty/ Action taken:</b>		Letter of non-compliance was sent	

<b>Case 10</b> <b>Bloated and shaking downer cow with breathing difficulties</b>		<p>The animal was lying in left lateral recumbency. The animal seemed bloated because her legs were stretched and breathing was heavy. The animal was shaking and was stressed. Respiratory distress was observed.</p>	
Place of loading:	British Columbia		
Place of unloading:	slaughterhouse in Alberta		
Journey time:	21.75 hours		
<b>Penalty/ Action taken:</b>		Unknown	

# Consignments marked 'unacceptable' without INCR

In three of the 12 cases (25%) that were marked as 'unacceptable', the inspector did not complete an INCR.

Case 11 <b>Dead cow on board</b>		Cow was found dead on the back compartment of the trailer. Cow was moderately bloated. It is an average looking cow with a body condition score of 25/5.
Place of loading:	unknown	
Place of unloading:	slaughterhouse in Southwest Ontario	
Journey time:	3 hours	
 <b>Penalty/ Action taken:</b>		Further investigation in case to be conducted
Case 12 <b>Lame cow cannot get up</b>		Downer in belly compartment. Loading density calculated and no overcrowding. Cow was laying in sternal recumbancy with hind legs apart, and was making no attempts to rise even with encouragement. Was euthanized on the truck.
Place of loading:	unknown	
Place of unloading:	slaughterhouse in Ontario	
Journey time:	2 hours	
 <b>Penalty/ Action taken:</b>		Further investigation by veterinarian to be conducted

# Consignments marked 'incomplete' on the Humane Transportation form

Two (1%) of the 276 transport-consignments were marked 'incomplete'. However, both had an INCR completed.



<p>Case 13 <b>Four downers on bare floor</b></p>		<p>On board were 28 cows of which four were downers on a bare floor (no litter). Despite trying to stimulate them to get up they were incapable. The employees of the slaughterhouse in Quebec euthanized (shot with a stun gun) all four. The cows came from an auction in Quebec where they had been sold the day prior to arriving at the slaughterhouse.</p>
Place of loading:	auction in Quebec and regrouped first at assembly centre in Quebec	
Place of unloading:	slaughterhouse in Quebec	
Journey time:	3.25 hours	
<p><b>Penalty/ Action taken:</b> Due to understaffing this case was left incomplete</p>		

<p>Case 14 <b>Lame cows not segregated</b></p>		<p>Two compromised (lame) cows were not separated on board and thus suffered additionally during loading, transport and unloading. The injuries were old and did not happen during transport. First cow had swelling at the level of the hock-joint and could not put weight on the right back leg. The second one had an infection of the hoof and also could not bear weight on it. They were unfit for transport in a large group as compromised animals like to be able to lie down and mixing them with stronger animals puts them at risk for trampling. The cows had been bought at auctions in Quebec, regrouped at a farm and then brought as a large consignment to the slaughterhouse in Quebec.</p>
Place of loading:	auction in Quebec	
Place of unloading:	slaughterhouse in Quebec	
Journey time:	3.25 hours	
<p><b>Penalty/ Action taken:</b> Unknown</p>		



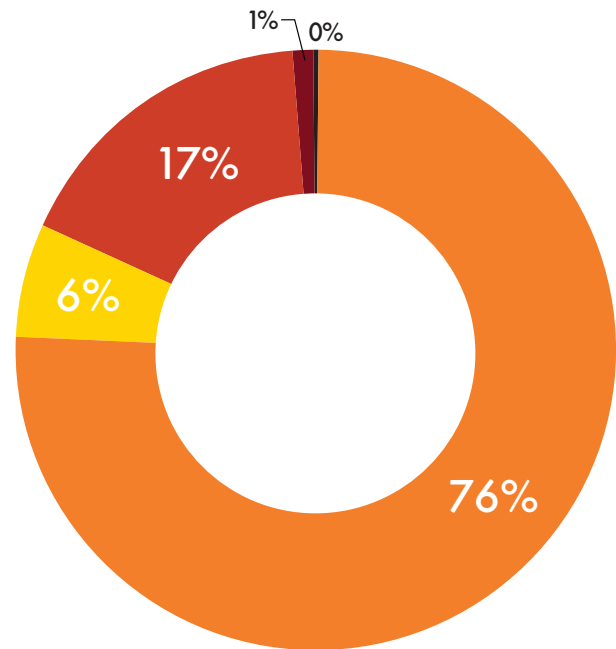
# Fitness for transport forms

Fitness for Transport forms were received for 39 consignments. Below are examples of some extreme cases. The time of unloading and loading and follow-up actions are not recorded on these forms.

<p>Case 15</p> <p><b>Downer cow with open wounds and swollen joints in severe pain due to transport</b></p>	<p>Swelling of right hock joint and presence of open wounds on right hock and right knee made the cow vulnerable to joint strain and severe pain. This got aggravated by motion during transportation trying to maintain balance and causing falling and further trauma. There was no bedding in the trailer compartment and the compromised cow was accompanied by two healthy cows in the same compartment. No special provisions were taken to prevent undue suffering. The animal was reluctant to get up or move due to pain in her joints."</p>	
<p>Place of loading:</p>	<p>Alberta</p>	<p>* It was not indicated on the form whether the cow was euthanized. However, since the inspector who was present confirmed that the cow was not able to rise on her own, euthanasia would be required in compliance with the HAR.</p>
<p>Place of unloading:</p>	<p>slaughterhouse in Alberta</p>	
<p>Case 16</p> <p><b>One cow was a downer and another one became a downer after she slipped on the ramp</b></p>	<p>Holstein cow became downer. There were no injuries, fractures or trauma to the cow. Was alert and responsive. Euthanized humanely in my presence. Another Holstein cow slipped on the ramp while coming out from the lower belly and could not get up. Euthanized humanely in my presence.</p>	
<p>Place of loading:</p>	<p>unknown</p>	
<p>Place of unloading:</p>	<p>slaughterhouse in Alberta</p>	
<p>Case 17</p> <p><b>Two downers in belly compartment</b></p>	<p>Two cows were down in the belly trailer. No injury or fracture was observed. The health of the cows was good. They were humanely euthanized.</p>	
<p>Place of loading:</p>	<p>unknown</p>	
<p>Place of unloading:</p>	<p>unknown</p>	

# Evaluation of inspection reports

In 24% (76 consignments) of the vehicles containing cull dairy cows, an animal welfare concern or violation was detected. In 25 of these consignments, the problem concerned more than one animal.



## Type of animal-welfare problems

Of the 318 consignments, 76 (24%) of them had one or more violations or welfare concern despite most of them being noted as "acceptable" by the inspector. Of these 76 consignments, 12 had more than one problem or violation. The most frequent problems involved downers, injured and sick cows, DOAs (dead on arrival) and poor transport conditions.

## Penalties and fines

Despite the number of consignments containing cows that were compromised or unfit, a monetary fine was issued for only one of the 318 consignments. The fine was likely issued because the transport company had a history of previous violations. In a second consignment marked as non-compliant, a warning letter was issued. In the remaining consignments, no further actions were reported or the information about further action was not included.

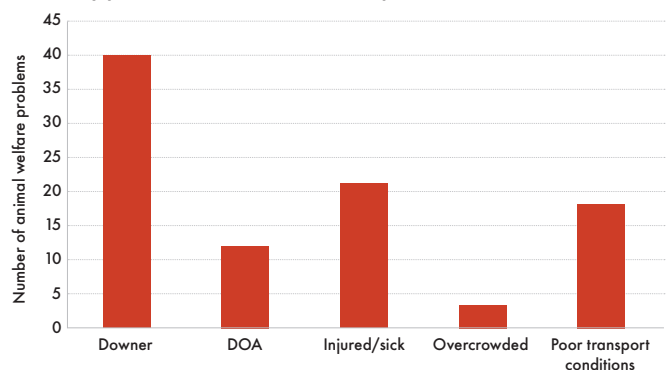
## Culled-cow transport categories

- Acceptable (no violations or problems)
- Acceptable, but with welfare problems
- Unacceptable with follow-up action
- Unacceptable without follow-up action
- N/A

## Excuses too often tolerated

Many veterinary inspectors wrote similar comments on the Fitness for Transport forms regarding animals arriving as downers or dead. Most of them reported that, due to a lack of information about the history of the cow and a lack of any obvious signs of injuries and diseases, they could not prove that the animal was unfit at the beginning of the journey and should never have been loaded. Drivers almost always (35 out of 36) claimed the animal arriving as a downer or dead at the slaughterhouse was in good condition during loading and there had been no issues.

## Types of animal welfare problems documented





Photos: Injured cow in transport  
Credit: Louise Jorgensen / Animal Sentience Project / We Animals Media

### Examples of excuses given by drivers

According to the driver, "the cow was fit at the time of loading and there were no concerns during transport and stop over. He only noticed that she was downer at the time of unloading."

According to the driver, "there was no issue while loading and during checks at breaks. He had only seen the downer during unloading."

In response to the inspector informing the driver that compromised animals must be segregated, the driver said, "the cows had been bought at a livestock market and brought to his own assembly centre. Almost all culled cows are lame and he could not isolate them, so he isolated just those who were the most seriously lame."

### Examples of statements from veterinarian inspectors

As per driver, "the cow was fit at the time of loading and became downer during unloading. There were no issues noticed by him during transportation."

"History of animal before transport is not available. Unable to comment further. Animal is in good body condition. No signs of disease, injury, fatigue, prolapse etc visible. Animal DOA (death on arrival). No signs of trampling. Trailer in good condition."

"History not available. Animal was bright alert and reactive but downer. There was no signs of disease, pathological condition or injury. 3/5"

"One cow was dead in the belly of the trailer. No injury or fracture was observed. Would have been in good health."



## Highlights from the Federal Inspection Reports

The federal inspection reports highlight several systemic issues that contribute to and exacerbate the poor welfare of cull dairy cows during their journey en route to slaughter. Records show gaps in information such as distance travelled, time spent at sales barns and auctions, and condition of animals at different points in the journey, pointing to limited accountability of any one person for the deterioration and poor conditions of animals. This includes:



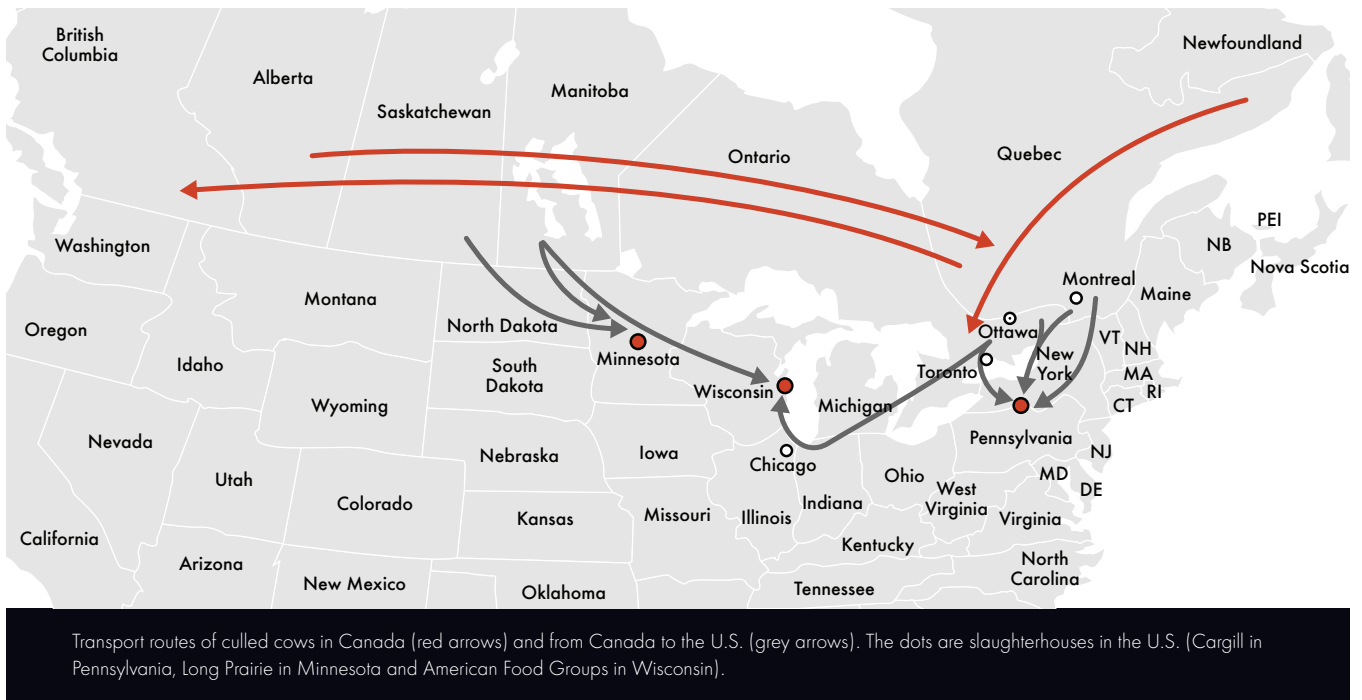
**Photos:** Cows on transport truck awaiting slaughter, Ontario  
Credit: Trev Miller / Animal Alliance of Canada

- 1 Unacceptable numbers of animals are experiencing poor welfare during transport to slaughter, including severely lame, sick and emaciated animals that are transported in contravention of the Health of Animals regulation
- 2 Poor condition of animals suggest many should not have been loaded in the first place
- 3 Animals experiencing prolonged suffering when they should have been euthanized
- 4 Suboptimal transport conditions (crowding, no bedding, animals not segregated)
- 5 Inconsistent and poor record-keeping
- 6 Enforcement and penalties for infractions are inconsistent and insufficient
- 7 Lack of accountability and traceability
- 8 Staffing challenges (documented in one case)
- 9 No or limited knowledge of the federal transport regulations (stated explicitly in one case)

## Results of U.S. FOI request

Although limited information was provided by APHIS on the transport of cull dairy cows from Canada once they cross the border into the U.S., the documents detailing the conditions under which vehicles were refused at the border highlight the poor condition of cull dairy cows being sent to slaughter.<sup>23</sup> Like the CFIA inspection reports, the point of origin indicated on the documents is the last stop of the journey, meaning the total time animals were in the system is not known. In all cases, the vehicles departed from an auction, further evidence that most dairy cows are sold through the auction system, and

are thus subjected to lengthy wait times and other stressors, likely contributing to their deterioration, before being shipped long-distances to the U.S. The longest time in transport according to the FOI documentation indicated a journey of almost 31 hours within Canada. The longest journey shown on documentation for animals from Canada heading for slaughter in the U.S. was 1,424 km, from Saskatchewan to Long Prairie, Minnesota. The locations of the U.S. slaughter plants processing cull cows from Canada suggest journeys could be substantially longer.

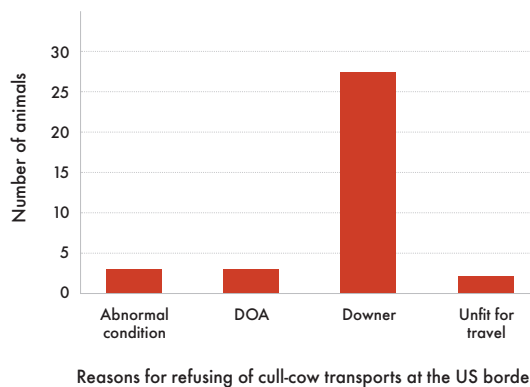


Vehicles were refused at the U.S. border for the following four reasons:

- 1 Downer
- 2 DOA (dead on arrival)
- 3 Abnormal condition
- 4 Unfit for travel

In most of the cases (77%), the presence of downers on board the vehicle was the reason the vehicle was refused entry into the U.S.

### Reasons for refusal at U.S. border



An important finding here is the lack of cooperation and transparency from the U.S. government to provide details on the fate of cull dairy cows coming from Canada and moving through the U.S. to slaughter. Aside from those refused at the border, the condition and fate of the cows is not known.

# What needs to happen now?

## Efforts to improve cull dairy cow welfare in Canada

End-of-life management of dairy cows has drawn industry and scientific attention in recent years. In 2017, Animal Health Canada (AHC) (formerly 'National Farm Animal Health and Welfare Council') published a report based on an expert consultation, which reflected the ongoing concerns of poor health and compromised welfare experienced by many cull dairy cows because of poor culling decisions, the current marketing system for cull cows and/or long-distance transport.<sup>6</sup> The consultation identified factors contributing to the reduced welfare experienced by these animals and made eight recommendations, which included:

- 1 The need for research to better understand cull cow management practices and movement of cows from farm to slaughter
- 2 The need for industry to raise awareness among producers and herd veterinarians about the potentially long journeys for cull cows so that this is considered when culling decisions are made
- 3 The need for training materials to educate producers on the importance of proactive culling
- 4 The importance of considering the animal's condition when culling decisions are made and that industry develop a decision tree to aid producers
- 5 Increased efforts be made to enable local slaughter and shorten transport times for cull cows
- 6 Making other slaughter options available for compromised animals such as OFES, direct to slaughter designations and mobile slaughter
- 7 That euthanasia be promoted as an acceptable and viable option for cull cows, and that producers and auctions should have the tools and training needed to perform euthanasia
- 8 Increased enforcement and harmonization of rules and regulations such that animal welfare is prioritized

The Canadian Veterinary Medical Association (CVMA) also published a position statement in 2018 opposing the long-distance transport of compromised cull dairy cows with recommendations for an on-farm management plan to prevent illness and injury resulting from multiple journeys and/or long-distance transport.<sup>24</sup>

Research undertaken in recent years at the University of Guelph, University of British Columbia and outside Canada highlighted earlier in the report has contributed to greater awareness of the risk factors impacting cull cow welfare. This has led to stronger requirements in the revised draft Dairy Code of Practice and educational resources developed by the Dairy Farmers of Canada to help producers better understand the cull cow marketing system, the value of making proactive culling decisions, and the economic benefits of culling healthy, fit cows.<sup>8,25</sup>



# Key recommendations

**Improving the welfare of cull dairy cows requires a multi-stakeholder approach. Building on the above-mentioned initiatives and recommendations made in AHC’s expert consultation report, World Animal Protection recommends implementing or strengthening measures in the following areas: regulations and standards, including enforcement; educational initiatives; localized and on-farm slaughter, as well as euthanasia options; incentive and disincentive programs; private sector involvement and accountability; and on-farm management practices.**

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## Regulatory measures and enforcement

The AHC’s expert consultation called for “consistent enforcement of relevant regulations to address animal welfare problems and to create public confidence”.<sup>9</sup> It states that the failure of authorities and regulatory bodies to do this creates an incentive for compromised animals to be sent to locations where few inspections are known to take place.<sup>9</sup> Another challenge are the gaps in legislative oversight. The fractured regulatory system means many animals fall through the cracks, failing to receive adequate protection. Indeed, recent research and the federal inspection reports described in this report confirm that there are many problems with the current regulatory systems and their weak enforcement. The recent updates to the HAR, such as the *Transfer of Care* requirements and the stronger rules pertaining to the transport of compromised and unfit animals, should provide more protections to cull dairy cows, but this is dependent on adequate inspections and consistent enforcement from the CFIA and the dairy industry to ensure compliance.

## Recommendations

- 1 Minimum standards with enforcement must be required at auctions and assembly yards to ensure the protection of animals being bought and sold, including:
  - Permanent access to fresh, clean water
  - Permanent access to roughage
  - Comfortable and quiet resting pens for compromised animals
  - Employee training in low-stress, humane handling techniques
  - Employee training in body condition scoring and to recognize behavioral signs of pain and distress
  - Bans on electric prods
  - Having mobile milkers on site so cows in lactation can be milked at the auction
  - Having low-density and comfortable group pens with non-slip floors
  - Having a stun-gun or vet present for emergency euthanasia of animals
- 2 Legislative and regulatory measures for auctions in all provinces must be implemented and include inspections and enforcement.
- 3 Regulatory and enforcement models should be harmonized, and inspections at all provincial auctions must be implemented.
- 4 Increased inspections and better enforcement of the HAR are needed and should include:
  - Thorough record-keeping by inspectors including the TOC documentation
  - Appropriate and strong penalties for violations
  - Training of inspectors in completing documentation, and assigning responsibility for unfit and compromised animals
  - Increased staffing

## Education and training initiatives

The expert consultation highlighted the need to increase awareness among producers and herd veterinarians on ‘fitness for transport’, journey times and the higher economic value of animals shipped in good condition.<sup>9</sup> Research indicates most producers are not aware of the lengthy journeys and delays to slaughter that are commonly experienced by most cull cows.<sup>17</sup> The implications of this mean some producers may make different culling decisions if they knew their animals would not be slaughtered within a reasonably short amount of time. Producers are rarely given feedback on the condition in which their animals arrive at the slaughter plant and there are minimal to no penalties for shipping compromised animals.<sup>7,26</sup> Lastly, awareness around the increased purchase price for cull cows in good health and body condition is not well-known by many producers – a potential incentive for shipping animals in good condition.<sup>26</sup> Efforts to make producers aware of the benefits of other slaughter options when animals are too sick or injured to be sent through the usual marketing systems would also improve animal welfare. Recent research shows there is still some concern and reluctance from producers about OFES. In summary, education in the following areas is needed:

- The lengthy journey times that are typical for most cull cows
- Factors influencing the condition of cows during transport
- The economic value of shipping cows in good condition
- Humane slaughter options such as local or mobile slaughter, OFES and euthanasia.

## Incentives and disincentives

There is little disincentive to farmers that ship compromised animals. Shipping compromised animals may yield less purchase value but saves producers the cost of euthanasia and carcass disposal expenses.<sup>27</sup> Euthanasia is an option rarely considered because of the loss of income and costs involved.<sup>26</sup>

Creating incentives and disincentives for producers and others involved in the transport and sale of cull dairy cows has the potential to motivate behavior change and reduce inappropriate culling and transport decisions. The dairy industry has an opportunity to play a more active role by instituting

a penalty system to discourage producers from shipping compromised animals. On the flipside, they could also work with other industry stakeholders to incentivize producers to make proactive culling decisions. For example, a premium could be paid to producers by processors/buyers who consistently ship fit, healthy cows.

Research suggests some producers do not recognize the value of cull dairy cows as a beef source, but they are an important part of the beef meat market.<sup>28</sup> Approximately 22% of beef comes from dairy cows in Canada and 19% in the U.S. (Email, July 25, 2022). The economic value given to cows is dependent on several factors and evidence indicates that culling cows at the appropriate time is beneficial for both cow welfare and cow value.<sup>26</sup> Cows are visually inspected at auction and the slaughter plant for health status (e.g., signs of injury or sickness such as lameness, body condition and age).<sup>26</sup> This is a critical educational opportunity to motivate farmers to pro-actively cull their animals as animals’ economic value is higher when they are healthier and fit.<sup>26</sup> Moorman et al’s<sup>18</sup> research evaluating the price of cull cows sold at Ontario auctions found cows in poor body condition (<2 on a 5-point scale) and those with an abnormal gait, sold for \$117 and ~\$32 less per cow than cows without these problems. Similarly, Stojkov et al<sup>7</sup> found price paid for cows were strongly dependent on body condition and “quality defects” such as those with injuries, abscesses, or signs of sickness. In this study, the price of cows was also influenced by the presence of lameness and udder condition.

A mitigating economic factor in the condition of cows at the time of culling is the demand and price of milk.<sup>7,27</sup> Research also suggests that milk demand and milk price influences culling decision, whereby periods of increased milk demand or higher purchase price can result in a decision to keep a cow in production longer, even if she is in a compromised state, thereby risking her deterioration before she is sent to slaughter. Again, the dairy industry should play a more active role. As a supply managed commodity, dairy industry associations, through the Milk Marketing Board (MMBs), could levy fines for producers that ship compromised animals and do not adhere to the ‘fitness for transport’ rules as laid out in the HAR and the Dairy Code of Practice. Reducing the quota for producers found to be repeat offenders would be a powerful disincentive that could increase compliance.



**Photos:** Cows on transport truck awaiting slaughter, Ontario  
Credit: Trev Miller / Animal Alliance of Canada



## Slaughter options and euthanasia

Animal auction markets are still customary in Canada as places to buy and sell farm animals and most cull dairy cows are sold through auctions. But the most humane end-of-life management option would be to send animals directly to a local slaughter facility. If this is not possible or if animals are compromised, mobile slaughter, OFES or euthanasia would be the best option. Expert opinion recommends these as preferred options for cull dairy cows given that many are compromised or vulnerable to becoming sick or injured on the journey to slaughter.<sup>7,24</sup>

In Europe, an animal advocacy organization whose mandate is focused on the welfare of animals during transport – Animals Angels – recently called upon the European Union to ban the sales of cull dairy cows from auction markets because of their fragility and proneness to extreme suffering.<sup>29</sup>

The expert consultation highlighted the challenges with the current slaughter system for cull dairy cows, most notably the lack of local slaughter options resulting in lengthy delays and long-distance travel.<sup>9</sup> No doubt the collaboration and cooperation among stakeholders required to change the existing marketing and slaughter system for cull cows would be challenging but the recommendation to move to a system of local 'direct-to-slaughter' options, along with other viable end-of-life options for cull dairy cows, would vastly improve the welfare of these animals.

## Increased private sector involvement and accountability

Many businesses (meat and dairy processors, retailers, restaurants) purchasing dairy products and/or meat from cull cows may have little knowledge about the cull cow welfare or the history of the animals from whom the meat they purchase comes from. For example, on one large processors' website, the company claims cows do not travel more than eight hours from the point of origin to the packing plant. However, this time only accounts for the final leg of the journey and does not account for the time in transit to the auction or sales barn, or the time waiting at the auction to be purchased and re-loaded for transport.

Buyers of cull cow meat such as retailers and quick-service restaurants should have more awareness and involvement concerning the animals' providing food to their customers. Improvements in farm animal welfare in the past decades have come in large part because of consumer pressure on businesses to change industry practices, indicating they have expectations from companies to ensure the humane treatment of animals in their supply chains. The treatment of cull dairy cows is no different. A parallel example is the increasing pressure from consumers and the advocacy community on restaurants to source only chicken meat from animals that have been slaughtered using 'controlled atmosphere stunning', a more humane method of slaughter for chickens. Restaurants and processors must work with other stakeholders to better understand the treatment of animals supplying food in their supply chains to set strong animal welfare policies, including instituting incentive and disincentive programs such as those outlined above.





**Photos:** Cow looking through fence at auction  
**Credit:** Julie LP / We Animals Media

## Conclusion

Over the past few decades, awareness, and concern about the treatment of farm animals by consumers and the public has grown and led to important welfare improvements. Historically, the dairy industry has not been the focus of animal advocacy campaigns or public demands to change its practices to the same extent as other animal agriculture industries. However, in recent years, the industry is coming under more scrutiny. Certain practices are found to be objectionable or inhumane, namely, cow-calf separation and confinement or restrictive housing (tie stalls and/or no pasture access). The industry is thus under growing pressure to address these concerns. Although the public is less familiar with end-of-life management for dairy cows and the welfare issues associated with this subset of the dairy cow population, as awareness grows, the industry and other stakeholders will likely come under public pressure to improve practices and ensure the welfare of cull dairy cows is protected during this last phase of their lives. Prioritizing the needs of cull dairy cows over convenience and the modest economic value received from these animals is essential to improve their welfare.

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**Photos:** Cows on transport truck awaiting slaughter, Ontario  
Credit: Trev Miller / Animal Alliance of Canada

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