

1 **Slaughter considerations for cull dairy cattle**

2 Lacey Alexander<sup>1</sup> and Lily Edwards-Callaway<sup>2</sup>

3 <sup>1</sup>Beef Welfare Lead, Cargill, 825 E Douglas Ave, Wichita, KS 67202

4 <sup>2</sup>Associate Professor, Colorado State University, Campus Delivery 1171, Fort Collins, CO 80523

5 **Abstract**

6 Dairy cattle are culled from the herd for multiple reasons and an evaluation of their condition is  
7 crucial in deciding their subsequent management (i.e., transport, euthanasia). When making  
8 decisions about the appropriate course of action for culled dairy cows, we need to consider the  
9 animals' ability to withstand the rigors of transport, to pass ante and postmortem inspection, and  
10 to ambulate on their own accord throughout the slaughter process. It is crucial to understand and  
11 acknowledge the conditions that cull dairy cattle must endure once they leave the dairy  
12 farm. Veterinarians play a critical role in guiding on-farm decisions about fitness for transport,  
13 ensuring the welfare of culled dairy cattle is prioritized throughout this critical period.

14 **Key Words**

15 antemortem inspection, cull cow, fitness for transport, plant

16 **Introduction**

17 Ensuring animal welfare is a critical component of all livestock production systems  
18 including both how animals are raised and how they are processed at the end of their lives. The  
19 welfare of cull (i.e., market) dairy cattle as they transition from milk production to meat  
20 production has been identified as a high-risk challenge area for the industry<sup>1-3</sup>. Studies utilizing  
21 expert consultation to identify areas of opportunity in cull cow management have indicated that  
22 cull cow condition warrants further attention and amelioration<sup>4-5</sup>. As a dairy cow ends her  
23 production on the dairy, sending her to the slaughter plant is a suitable option if she is in the

24 appropriate condition to withstand the journey and the associated processes at the slaughter plant.  
25 While the majority of culled cows sold for slaughter are in good condition, data from  
26 observations at auction markets and slaughter plants suggest that a portion of the cull cow  
27 population are in poor condition<sup>6-8</sup> suggesting that across the supply chain, we, as an industry, are  
28 not always making decisions that prioritize cull cow welfare at this important juncture in a dairy  
29 cow's life. Making end-of-life decisions for dairy cattle is not simple and there are many  
30 competing factors (i.e., economic incentives, human-animal bonds, awareness/knowledge)<sup>1,5,9</sup>  
31 that make some of these decisions challenging to make. Despite the difficulty around these  
32 critical decisions, it is important that everyone involved have knowledge about both the journey  
33 that the cow needs to make to get to the terminal market once she leaves the farm and the  
34 consequences of these decisions on cow welfare. The objective of this paper is to review  
35 considerations for fitness for transport, the journey, and the in-plant processes as they relate to  
36 cull cow welfare.

### 37 **Fitness for transport**

38 All stakeholders that interact with cull dairy cattle (i.e., dairy owners and caretakers,  
39 auction market employees, transporters, slaughter plant employees, etc.) should understand the  
40 phrase "fitness for transport." Fitness for transport is the animal's ability to withstand  
41 transportation without compromising its welfare. Keeping fitness for transport considerations in  
42 mind should help individuals make good decisions when loading cattle for transport. Industry  
43 animal care guidelines for both beef and dairy cattle, both emphasize the importance of fitness  
44 for transport and provide examples of what makes an animal unfit for transport<sup>10-11</sup>. Additionally,  
45 the Beef Quality Assurance Transportation (BQAT) program<sup>12</sup>, which is a training program for  
46 transporters used by the beef and dairy industries, includes factors that one should consider when

47 assessing fitness for transport. Some of the primary conditions that would make a cull cow unfit  
48 to be transported are the following: severe lameness, poor body condition score (less than 2),  
49 exhaustion/dehydration, fractures of limbs, spine injuries, open wounds, unreduced prolapses,  
50 calving, suspected nervous system disorders, and non-ambulatory animals. The National Beef  
51 Quality Audit (NBQA) is a survey that is conducted every 5 years and is funded by the Beef  
52 Checkoff administered by the National Cattlemen’s Beef Association. In the 2022 NBQA, when  
53 assessing cull cattle at the slaughter plant, the following visible defects were found: full bag, calf  
54 in pen, retained placenta, bottle teats, mastitis, failed suspensory ligaments, swollen joints, foot  
55 abnormalities, and lumpy jaw in the sample population. Borders et al.<sup>7</sup> reported the results of the  
56 2022 NBQA and indicated that less than a quarter (21.2%) of dairy cows had no defect which  
57 was less than all other animal type categories (66.0% of beef cows, 79.9% of beef bulls, and  
58 78.4% of dairy bulls had no defects).

### 59 **Journey to slaughter**

60 When assessing fitness for transport, we also must take into consideration what we are asking  
61 of the animals once they leave the farm. Will the animals be able to withstand the rigors of  
62 transport if:they going directly to slaughter?,they going to a sale barn or buying station?, it is  
63 hot?, it is cold?, or if the journey is long?There is only one law in the United States that dictates  
64 the length of time animals can be in transit without feed, water, and rest (FWR); the Twenty  
65 Eight Hour Law<sup>13</sup>states if livestock are being transported for longer than 28 consecutive hours,  
66 they must be offloaded for at least 5 consecutive hours to get FWR. The Food Safety Inspection  
67 Service (FSIS) Directive 6900.2 Rev 3<sup>14</sup>states that if livestock arriving at a federally inspected  
68 establishment appear to be exhausted or dehydrated, inspection are to ask the establishment  
69 management if the truck driver stopped to provide the livestock FWR within the preceding 28

70 hours. If it is found that the animals were deprived of FWR, FSIS inspection will alert Animal  
71 and Plant Health Inspection Service (APHIS) so that APHIS can conduct an investigation. The  
72 2022 NBQA reported that on average culled animals traveled 6.3 hours to the plant from their  
73 last place of origin<sup>7</sup>; this may not represent total travel time if they came from an auction market  
74 and not directly from a dairy. Additionally, the NBQA data showed that the maximum time in  
75 transit prior to arrival at the plant was 24 hours. Although these are falling within the federal  
76 regulation, these are still considerable distances for culled cattle to travel particularly if they are  
77 in poor condition.

#### 78 **At the slaughter plant**

79 Once livestock arrive at the plant, their welfare is considered the slaughter plant's  
80 responsibility. The Federal Meat Inspection Act (FMIA)<sup>15</sup> mandates inspections to ensure meat  
81 safety, while the Humane Methods of Slaughter Act (HMSA)<sup>16</sup> requires that animals be handled  
82 and slaughtered humanely. At the plant, the United States Department of Agriculture Food Safety  
83 Inspection Service (FSIS) inspection will perform a task called ante mortem inspection before  
84 animals can be slaughtered. During ante mortem inspection, livestock are evaluated in motion  
85 and at rest for the following conditions: sickness, possibility of being treated with antibiotics  
86 (potential residue), may pose a threat to the health of workers, may have a reportable disease,  
87 may pose a slaughter floor contamination threat, or are otherwise unfit for human consumption<sup>17</sup>.  
88 During ante mortem inspection, the disposition of each animal is determined and the decision is  
89 made to either (1) pass the animal for slaughter, (2) slaughter it as a suspect, or (3) condemn it. If  
90 an animal is determined to be healthy and fit for human consumption, it is passed for slaughter. If  
91 the animal is unhealthy and unfit for human consumption, it is condemned. The decision to  
92 condemn an animal is made if it is: dead, clearly shows signs of a disease that would be

93 condemned on the slaughter floor, has a central nervous system disorder, fever, or is non-  
94 ambulatory, or has a severe injury<sup>17</sup>. It should be noted that all non-ambulatory disabled cattle  
95 and calves must be condemned according to federal regulation. Animals that physically present  
96 with a questionable condition upon ante mortem inspection, and in the opinion of the inspector,  
97 may pose a potential human consumption threat, may also be deemed U.S. suspect. These  
98 animals are segregated and tagged for special post mortem inspection.

99 Visible defects that are commonly observed at plants that slaughter cull cows include but are  
100 not limited to: cancer eye, lump jaw, surgery, abscess, prolapse, arthritis, severely lame, and poor  
101 udder condition. The HMSA<sup>16</sup> require plants to handle animals with minimum excitement and  
102 discomfort. It is necessary to consider that animals with the aforementioned conditions (and may  
103 not have been fit for transport) can often be a challenge to handle putting the plant at risk when  
104 having to deal with compromised animals. Additionally, it is important to remember, in  
105 accordance with FSIS Directive 6100.1 Rev 3<sup>17</sup>, once livestock arrive to slaughter, they must  
106 ambulate without assistance throughout the slaughter process. Upon arrival at the slaughter  
107 plant, cattle are expected to walk to a lairage pen. These pens have variable flooring and may  
108 have unfamiliar animals. Cattle remain in lairage for a large range of time, usually around a  
109 minimum of 2 hours. During this time cattle will also need to go through antemortem inspection;  
110 animals must be observed at rest and in motion meaning they will need to be handled during that  
111 time. Then animals will be moved out of the lairage pen, through the facility to the stunning area;  
112 this distance is highly variable. If cattle become recumbent and refuse to rise, they will be  
113 humanely euthanized and condemned. In short, upon arrival at the plant, culled dairy cattle will  
114 endure a holding period which includes multiple handling events prior to slaughter and must be  
115 able to withstand all pre-slaughter processes.

## 116 **Conclusions - Getting involved as a veterinarian**

117 Cull dairy cows have multiple jobs; when they are done producing milk, they enter the  
118 beef supply chain. While it is widely understood that economics is the bottom line in any  
119 business model, our commodity is an animal that can feel pleasure and pain. These cows have  
120 worked hard for us; it is our responsibility to do what's right for them. Culling management  
121 should take into account an animal's ability to withstand the journey from farm to slaughter  
122 without compromising welfare. Are we being realistic about the likelihood of her  
123 recovery? Why are we culling her? Is she injured? Is she exhausted? Once the trailer leaves to  
124 farm, where is she going? Is it hot? Is it cold? Will she be able to walk off the trailer? Will she  
125 pass ante mortem and post mortem inspection? Is she strong enough to walk through the plant  
126 process? In conclusion, fitness for transport can be correlated to timely culling and appropriate  
127 end of life decisions.

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