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Changing the World for Animals

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Submitted via email to humaneendings@avma.org, jarce@avma.org, jdonlin@avma.org, and cjohnson@avma.org

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Dear Dr. Arce, Dr. Donlin, and Dr. Johnson,

On behalf of Animal Outlook (AO), I write to provide video recordings of ventilation shutdown (“VSD”) and ventilation shutdown plus (“VSD+”) experiments conducted on hens at North Carolina State University. As the Panel on Animal Depopulation (“the Panel”) is currently considering a pending resolution urging the American Veterinary Medical Association (“AVMA”) to classify VSD and VSD+ as “Not Recommended,”¹ we offer these videos as firsthand evidence of the magnitude of suffering inflicted on animals subjected to these methods. For the reasons discussed herein, we encourage the AVMA to swiftly adopt the pending resolution and label all methods of VSD as “Not Recommended.”

The videos linked below and discussed in a recent media [story](#) include approximately 10 hours of content taken as part of a North Carolina State University research experiment conducted in 2016. These videos depict individual hens attached to electrodes used to measure biological data, placed in a sealed chamber equipped with a viewing window through which researchers observed their suffering, and then subjected to varying combinations of suffocation, heat, and carbon dioxide.

¹ Resolution #8-2021, Regular Winter Session, American Veterinary Medical Association, <https://news.vin.com/apputil/image/handler.ashx?docid=10017798> (last visited Mar. 23, 2022).

Video Access

- An abbreviated, 16-minute compilation of these videos can be accessed [here](#) using the password: qJ0#5iakwFvu
- The full set of videos can be accessed and downloaded [here](#)

The images below provide representative context on the methods used in these experiments.



I. The AVMA Guidelines for the Depopulation of Animals sanction various forms of VSD for both poultry and pigs.

The AVMA presents itself as the “trusted leader” of the veterinary profession,² and as such, its endorsement of various methods of VSD allows the animal agriculture industry to subject millions of animals to unimaginable suffering in reliance on AVMA guidance. Currently, the AVMA Guidelines for the Depopulation of Animals: 2019 Edition (“the Guidelines”) endorses and supports variations of VSD for both poultry and pigs.

A. Poultry

According to the Guidelines for poultry, “[v]entilation shutdown alone is categorized as not recommended.”³ However, “Ventilation shutdown plus heat, VSD plus CO₂, and VSD plus heat and CO₂ applied in a manner that will produce a 100% mortality rate meets the classification category permitted in constrained circumstances.”⁴

² *Vision, mission, and values*, AMERICAN VETERINARY MEDICAL ASSOCIATION, <https://www.avma.org/about/vision-mission-and-values> (last visited Mar. 23, 2022).

³ AVMA Guidelines for the Depopulation of Animals: 2019 Edition, American Veterinary Medical Association, <https://www.avma.org/sites/default/files/resources/AVMA-Guidelines-for-the-Depopulation-of-Animals.pdf>, p.62 (last visited Mar. 23, 2022).

⁴ *Ibid.*

B. Pigs

The Guidelines are less clear when it comes to VSD for pigs. While the AVMA has publicly stated that “VSD is not listed in the AVMA guidelines as an option for pigs,”⁵ the wording of the Guidelines is ambiguous and suggests that VSD alone (i.e. without additional heat or CO₂) may be acceptable in certain instances. The Guidelines state:

The [Panel on Depopulation] recommends that VSD only be used in facilities with the capability to adequately increase air temperature to a level that causes the generation of latent heat that results in a > 95% death rate in < 1 hour. The goal of any depopulation is 100% mortality, and this remains true for VSD. To achieve this goal, additional heat sources or the addition of CO₂ may be needed.⁶

Thus, the Guidelines seem to sanction VSD in the event a certain rate of death is achieved but indicate that VSD+ may need to be used to achieve such a result.

II. Disturbing videos of VSD experiments conducted at North Carolina State University reveal that chickens exposed to VSD and VSD+ suffered horrifically.

The North Carolina State University videos depict profound and prolonged suffering. Given the AVMA’s stated focus on the “well-being of animals”⁷ and its commitment to acting with “integrity, honesty, and respect,”⁸ the Panel must confront this suffering in deciding the pending resolution.

As captured in the videos, hens exposed to VSD and VSD+ manifested their suffering in numerous graphic ways, including:

- Extreme gasping, panting, and labored breathing;
- Desperately searching wide-eyed—and always futilely—for a means to escape the sealed experimentation chamber;
- Jumping, charging, and kicking at the walls and plastic observation panel to escape;
- Flailing and thrashing wildly, often becoming entangled in the wires connected to their skulls;
- Slumping and falling to the wire grate, in many cases with brownish liquid draining from their beaks into pools on the floor of the experimentation chamber; and
- Convulsing violently, trembling, and becoming rigid.

The images below depict isolated instances of these agonized reactions:

⁵ *HOD recommends depopulation policy sent to expert panel for further consideration*, JOURNAL OF THE AMERICAN VETERINARY ASSOCIATION NEWS, <https://www.avma.org/javma-news/2021-09-15/hod-recommends-depopulation-policy-sent-expert-panel-further-consideration> (last visited Mar. 24, 2022).

⁶ AVMA Guidelines for the Depopulation of Animals: 2019 Edition, AMERICAN VETERINARY MEDICAL ASSOCIATION, <https://www.avma.org/sites/default/files/resources/AVMA-Guidelines-for-the-Depopulation-of-Animals.pdf>, p.45 (last visited Mar. 23, 2022).

⁷ *We are AVMA*, AMERICAN VETERINARY MEDICAL ASSOCIATION, <https://www.avma.org/about> (last visited Mar. 24, 2022).

⁸ *Vision, mission, and values*, AMERICAN VETERINARY MEDICAL ASSOCIATION, <https://www.avma.org/about/vision-mission-and-values#> (last visited Mar. 24, 2022).



The suffering endured by these hens is particularly troubling in light of the fact that the Guidelines rely on North Carolina State University depopulation studies, including potentially the very studies that are the subject of these videos. The Guidelines state:

The Response Guide states that the temperature of the house must be raised to 104°F or higher as quickly as possible and preferably within 30 minutes, maintaining a temperature of between 104°F and 110°F for a minimum of three hours. Recent research conducted at *North Carolina State University* and the USDA Response Guidance indicate that VSD alone may not achieve this outcome and that supplemental heat may be needed to achieve this standard. While the USDA guidelines do not recommend the addition of supplemental CO₂, the *North Carolina State University research* demonstrates that VSD with the addition of supplemental heat, CO₂, and heat plus CO₂ were equally beneficial in decreasing time to 100% mortality. Ventilation shutdown with the addition of heat ensures the temperature standard is met. The obvious goal is a 100% mortality rate in as short a time as possible.⁹

In addition to the obvious suffering depicted in the videos, past concerns have been raised about the scientific legitimacy of the North Carolina State University studies upon which the AVMA relies. These concerns include potential reporting and mathematical errors, lacking definitions, improper reliance on Heat Shock Protein as a measure of “humaneness,” and failure to report length of time unconscious.¹⁰ The irrefutable suffering reflected in the videos combined with the dubious scientific legitimacy of the studies raises grave concerns as to the AVMA’s reliance on them and its subsequent endorsement of various forms of VSD.

The videos obtained by Animal Outlook are not the only evidence of graphic suffering associated with VSD, however. In May 2020, another animal protection organization obtained undercover video of VSD being used on pigs at an Iowa farm.¹¹ These videos—just as the North Carolina State

⁹ AVMA Guidelines for the Depopulation of Animals: 2019 Edition, American Veterinary Medical Association, <https://www.avma.org/sites/default/files/resources/AVMA-Guidelines-for-the-Depopulation-of-Animals.pdf>, p.61-62 (last visited Mar. 23, 2022).

¹⁰ Letter to Jose Arce, American Veterinary Medical Association, Animal Welfare Institute, <https://awionline.org/sites/default/files/uploads/documents/AWI-Letter-AVMA-Depopulation-Panel-Oct-2021.pdf> (last visited Mar. 23, 2022).

¹¹ *Hidden Video and Whistleblower Reveal Gruesome Mass-Extermination Method for Iowa Pigs Amid Pandemic*, THE INTERCEPT, <https://theintercept.com/2020/05/29/pigs-factory-farms-ventilation-shutdown-coronavirus/> (last visited Mar. 23, 2022).

University videos portray for chickens—document the acute suffering of pigs subjected to this AVMA-approved method, including their “sustained screams of distress and agony.”¹²

If the AVMA’s commitment to the “well-being” of animals is to mean anything, it must not recommend any form of VSD. We urge the AVMA to swiftly adopt the pending resolution and classify all forms of VSD as “Not Recommended.”

III. Our request adds to the voices of thousands of veterinarians who have already asked the AVMA to classify any form of VSD as “Not Recommended.”

Across the country, veterinarians have been urging the AVMA to denounce the practice of VSD in all of its forms. As stated above, dozens of veterinarians signed a petition in January 2021 urging the AVMA to adopt a resolution and classify all forms of ventilation shutdown as “Not Recommended” for poultry and pigs.¹³ In August 2021, the AVMA House of Delegates voted overwhelmingly to refer the resolution to the AVMA Board of Directors for consideration by this Panel¹⁴ where it now resides.

The January 2021 resolution followed the outcry of thousands of other veterinarians urging the AVMA to take the same action. In December 2020, more than 2,900 veterinary professionals signed a petition also asking the AVMA to classify all methods of VSD as “Not Recommended.”¹⁵ Similarly, in October 2021, dozens of veterinarians published an open letter to the AVMA denouncing its endorsement of this cruel practice.¹⁶

We offer these videos in the hope that the Panel will view them, acknowledge the suffering inherent to this cruel practice, and acknowledge the voices of its members by adopting the pending resolution and formally classifying VSD and VSD+ as “Not Recommended.”

If you have any questions regarding this matter, please contact me at (804) 307-4102 or wlowrey@animaloutlook.org. We appreciate your consideration.

Sincerely,



Will Lowrey
Counsel
Animal Outlook

¹² *Ibid.*

¹³ Resolution #8-2021, Regular Winter Session, American Veterinary Medical Association, https://www.avma.org/sites/default/files/2021-07/2021S_Resolution8_VSD.pdf (last visited Mar. 23, 2022).

¹⁴ *Depopulation policy sent to expert panel for further consideration*, AMERICAN VETERINARY MEDICAL ASSOCIATION, <https://www.avma.org/journals/convention-newspaper/depopulation-policy-sent-expert-panel-further-consideration> (last visited Mar. 23, 2022).

¹⁵ *More than 2,900 Veterinary Professionals & Advocates Call on AVMA to Prevent Brutal Ventilation Shutdown on Farms*, PR NEWSWIRE, <https://www.prnewswire.com/news-releases/more-than-2-900-veterinary-professionals--advocates-call-on-avma-to-prevent-brutal-ventilation-shutdown-on-farms-301194387.html> (last visited Mar. 23, 2022).

¹⁶ *Veterinarians respond to AVMA’s inaction on Ventilation Shutdown*, OUR HONOR, <https://www.ourhonor.org/blognew/avmavsd> (last visited Mar. 23, 2022).