Introduction to the U.S. Cattle Industry Feedyard Audit

D. Sjeklocha, DVM Merck Animal Health, Topeka, KS 66617

Abstract

Beef consumers want to know more about the beef they eat. They are interested in how the animals are raised, how they are treated on farms, ranches and feedyards, and they want to be assured that the beef they put on their table comes from operations that use good animal welfare and husbandry as their guiding principle. The U.S. Cattle Industry Feedyard Audit recently received PAACO certification and is in the process of being utilized across the cattle feeding sector. The NCBA Feedyard Welfare assessment served as the basis for the Feedyard Industry Audit. Since there is also an NCBA Stocker Assessment and an NCBA Cow-calf Assessment, one could surmise that those segments will soon have an audit as well. Veterinarians should take advantage of this opportunity to help their clients develop a robust animal welfare program.

Key words: feedyard, welfare, audit

The U.S. Cattle Industry Feedyard Audit was developed because consumers want to know that the beef animal has been properly cared for as it was being raised. There's also been growing demand both from our consumers and from inside the industry for a true third-party audit. This audit also verifies the feedyard's activities and protocols that are used in raising cattle. There are other audits in the industry including the Tyson Farm Check, which is actually going to move to the U.S. Cattle Industry Feedyard Audit. Another example is the Progressive Beef Audit, which is privately owned and currently used by Tyson and Wendy's, for example.

The U.S. Cattle Industry Feedyard Audit tool is owned by the National Cattlemen's Beef Association (NCBA) and was developed under the direction of the Cattle Health and Well Being Committee of NCBA. Authors of this audit include feedyard owners and managers, veterinarians, animal scientists, packers, extension agents and trade association representatives. This is a free tool to be utilized by any organization and the only cost to using this tool is associated with having a third-party audit conducted. All auditors must be Professional Animal Auditor Certification Organization (PAACO)-certified and Beef Quality Assurance (BQA)-certified. This audit in its entirety can be found at https://www.ncba.org/feedyardaudit.aspx.

The scope of this audit includes all feedyards, independent of size, housing type, breed or geographical location. It covers the cattle from the time they are received through the time they are shipped. The audit itself includes a review of records, protocols, animal observations, processing and facilities.

The audit should be conducted when the feedyard is operating under normal conditions. In other words, it should not be conducted during a snowstorm or any severe weather event, for example. When an audit is conducted the feedyard will be contacted ahead of the audit and will be informed of the preferred dates and times to conduct the audit. The feedyard can negotiate those dates and times. There is a preparation checklist for the feedyard in the appendix of the audit tool, so the feedyard can prepare ahead of time. One of the major concerns of having an auditor on site is if the auditor is well-versed in the daily activities as a feedyard. PAACO feedyard-certified auditors must undergo feedyardspecific training through PAACO. Certified auditors must also be BQA-certified.

There are several factors or issues that could result in audit failure. These include *Willful Acts of Abuse and Egregious Acts of Neglect*. It's important to understand what constitutes willful acts of abuse and egregious acts of neglect. Willful acts of abuse would include:

- Dragging of conscious animals by any part of their body except in the rare case where a non-ambulatory animal must be moved from a life-threatening situation,
- Deliberate application of electric prods to an animal that has no place to go,
- Deliberate electric prodding of animals multiple times in an egregious manner,
- Deliberate application of electric prods to sensitive parts of the animals such as the eyes, ears, nose, anus, vulva, udder or testicles,
- Deliberate slamming of gates on cattle unless it's for human safety,
- Malicious hitting or beating of an animal which includes forcefully striking an animal with a closed fist, foot, and/ or handling equipment such as a sorting paddle or sorting stick,
- Deliberate driving of ambulatory cattle on top of one another,
- Tail docking unless on the advice of a licensed veterinarian,
- Abdominal surgery conducted by an unqualified or untrained person without anesthetic or analgesia, rectal, vaginal, or uterine prolapse replacements with suture or amputations without anesthetic and analgesia,
- Euthanasia by means other than approved methods covered under BQA guidelines,
- During euthanasia by gunshot failing to immediately deliver additional shots if the first shot does not render the animal insensible and then dead,
- During euthanasia by gunshot using a caliber that is not appropriate for the class of animal as per BQA guidelines,
- Any live animal observed on the dead stock pile,
- An unchecked dog biting cattle in the chute with cattle having nowhere to go,
- Finding a live animal frozen to the ground,
- Branding wet cattle,
- Loading cattle unfit for transport as per BQA transportation guidelines.

Egregious acts of neglect include:

- Failing to follow veterinary protocols related to timely euthanasia of critically ill, distressed or injured animals,
- Failing to euthanize a chronically diseased or injured animal with a body condition score less than 2,
- Failing to follow veterinary protocol related to timely treatment of an injured animal,
- Failing to provide daily feed to cattle within a 24-hour period,
- Failing to provide ad libitum water to cattle in home feeding pens,
- Failing to provide water to non-ambulatory animals,
- Failing to assist a known calving heifer in a timely manner,
- Failing to assist a newborn calf in distress,
- Failing to immediately assist and provide medical care to a non-ambulatory animal,
- Failing to provide immediate medical assistance to a compromised animal unloaded from a livestock truck as per BQA transportation guidelines,
- Loading a compromised animal without special transport provisions as per BQA transportation guidelines.

Any willful or egregious acts of abuse witnessed by the auditor are grounds for immediate audit failure.

The audit requires feedyards to develop written protocols and procedures. Where applicable, if the feedyard does not have a documented protocol, but an interviewed employee can demonstrate how a protocol is implemented, partial credit can be awarded. Also, where applicable, if the feedyard does not have documented records that verify a particular protocol is being implemented, but an interviewed employee can demonstrate how a protocol is implemented, partial credit can be awarded. Records for the last 2 years must be made available for review by the auditor.

One of the requirements of the audit is that the feedyard must do a self-assessment by completing the BQA Feedyard Welfare Assessment within the last 3 years of the audit date. Other requirements include that the feedyard manager or key employees must be certified in Beef Quality Assurance. Feedyards must also be able to document an employee training program and that all employees have signed a Commitment to Animal Welfare Policy.

The feedyard must be able to demonstrate that a veterinarianclient-patient relationship (VCPR) exists between the feedyard and the veterinarian of record. A VCPR form must be used to verify that this relationship exists. There must also be records available at verify a VCPR in some capacity. These records could include documentation such as veterinary visit reports, billing records or other proof documents. There are a host of protocols that must be written and available for inspection. It is important to know that each protocol must be backed up by documentation that the protocol is being implemented. **Required protocols are as follows:**

- Routine Animal Care Protocol (feed delivery, pull records, etc.),
- Herd Health Management Protocol (developed in consultation with a veterinarian) that includes the vaccination program, parasite prevention program, nutrition program,
- Observation and Disease Identification Protocol,
- Treatment protocol for specific diseases common to the feedyard,
- Hospitalization and Sick Pen Management and Monitoring Protocol,

- Disease-specific treatment protocols,
- Surgical Procedures Protocol (developed in consultation with a veterinarian),
- Antibiotic Stewardship Protocol (developed in consultation with a veterinarian),
- Calving Heifer and Newborn Calf Care and Management Protocol (along with records available of calves born on site being moved to locations off site). This protocol is not required if the feedyard can show proof that they do not feed any heifers.
- Cattle Health Product Management Protocol that includes receiving, handling, storage and inventory of all animal health products. These records must include the product name, its manufacturer, the number of doses or mls, the lot/serial numbers, and expiration dates,
- Cattle Health Product Disposal Protocol which includes the process of evaluating cattle health product expiration dates and cattle health product disposal,
- Compromised Cattle Evaluation Protocol,
- Non-ambulatory Cattle Handling Protocol,
- Euthanasia Protocol,
- Documentation showing who are the primary personnel responsible for euthanasia decision-making, documentation also showing the secondary or additional personnel responsible for euthanasia decision-making,
- Documentation showing what the primary euthanasia tool is,
- Documentation showing what the secondary euthanasia tool is,
- Records showing maintenance and functionality checks of each euthanasia tool,
- Cattle mortality records,
- Feedyard Carcass Disposal Protocol,
- Feed Quality Protocol,
- Documentation showing no ruminant-derived proteins were received or fed,
- Medicated Feeds Protocol,
- Unloading Protocol,
- Receiving and Processing Protocol,
- Inclement Weather Protocol,
- Broken Needle Protocol,
- Shipping Protocol,
- Loading Protocol,
- Pen Surface Maintenance Protocol, and
- Emergency Action Plan.

It is important to reiterate that the auditor will ask for proof or documentation that these protocols are actually being implemented.

Most likely, the bulk of the requirements of this audit are already in place, but they have not been documented. Cattle packing plants have been subjected to animal welfare audits for years. Now, we have a feedyard audit that is PAACO-certified, and that audit is heavily based on the NCBA Feedyard Welfare Assessment. Currently, there is also a Stocker Welfare Assessment and a Cow-calf Welfare Assessment, so it stands to reason that those assessments will be developed for PAACO-certified audits as well. Veterinarians should help to prepare their clients now for the audits to which they will eventually be subjected by utilizing the assessments currently available.

