



# AMERICAN HUMANE

*Protecting Children & Animals Since 1877*

June 30, 2008

*Sent via Federal eRulemaking Portal*

**Comment On: [APHIS-2006-0024-0001](#)  
Minimum Age Requirements for the Transport of Animals**

On behalf of the American Humane Association, an organization with over 130 years of protecting animals and children from cruelty and maltreatment, and our national membership, we offer these comments on the Department of Agriculture Animal and Plant Health Inspection Service (APHIS) Proposed Minimum Age Requirements for the Transport of Animals regulations, published in the Federal Register, Vol. 73, No. 91, May 9, 2008.

American Humane commends APHIS for addressing the Animal Welfare Act's (AWA) currently incomplete treatment of all young animals shipped for transport. As currently written, Section 2.33 does not include species other than domestic dogs and cats in its eight-week threshold. Extending this threshold to all other species transported in commerce is a critical step toward improving animal welfare. Despite this critical step, however, American Humane believes APHIS must create a more comprehensive and species-specific protocol in lieu of a standard eight-week minimum.

Depending on the species and the particular circumstances of the individual animal and its physical and mental requirements, the eight-week minimum may be a wholly inadequate measure of its successful chances of survival. At the other end of the spectrum, there may be species for which the eight-week minimum is unnecessarily restrictive. To assure an animal's welfare is not compromised during commercial transport, the animal must be fully weaned or nutritionally supplemented through the weaning process, adjusted physiologically and socially independent.

Consideration of the immunological health is important in all species given the stress of transport. Our experience indicates that puppies should not be transported before 14 to 16 weeks of age due to greater incidence of parvoviral infections and presumably other puppy related diseases in animals shipped at eight weeks of age (and sometimes younger in spite of the current rule). Attention to proper vaccination sequence and a look at the timing of transport should be examined as well in all species where vaccination protocols are established.

Natural weaning is a gradual and stressful process for many species, especially captive primates. Primate infants bred for commercial purposes are usually weaned at an age significantly younger than biologically natural. This compromises not only animal welfare, but sound science, which ideally is dependent on healthy and well-adjusted animals. Primates separated from their mothers at an early age—such as eight weeks—suffer from abnormal behavior, sleep deprivation, and long-lasting physical trauma.<sup>1</sup>

Findings suggest the better protocol is to allow infant primates to be naturally-weaned and socialized before they are transported for commercial purposes. The International Primatological Society

recommends “[t]he young monkey should not normally be separated from its mother at an early age but should remain in contact for one year to 18 months, in most species.”<sup>2</sup> More specifically, the average chimpanzee is weaned at five years, and spends another 7 to 10 years traveling with its mother in order to learn how to survive and socialize on its own.<sup>3</sup>

Premature transportation also has extremely traumatic and potentially fatal consequences for foals and mares. Pre-weaning stress results in reduced immunity to disease, injurious and self-destructive behavior, and panic. For this reason, foals are typically weaned when they reach at least four to six months of age.<sup>4</sup> However, the exact timing of weaning depends on the foal’s physical maturity, emotional independence, and general health. According to the UC Davis School of Veterinary Medicine, distressed mares and foals can suffer from a life-threatening loss of protective T-cells.<sup>5</sup> “Weaning should encourage maximum health of the mare as well as optimum growth and positive mental attitude of the foal . . . There is no single best answer as to exactly when to wean a foal.”<sup>6</sup>

While early transport of any young animal poses inherent physical and adjustment health risks in all species, on the other side of the spectrum are species for which the eight-week minimum may be unnecessarily restrictive. For example, the spiny mice species are typically weaned and fully independent at 4-5 weeks,<sup>7</sup> whereas the average sow may be weaned at less than 4 weeks.<sup>8</sup> Examination of the animal’s weight, physical and adjustment health, as well as its social independence are factors that must be employed in lieu of examination of the animal’s age.

In cases where weaning occurs before the normal range of weaning by that species there must be a supplementation plan in place, developed by an animal nutritionist, meeting the animal’s normal nutritional requirements in preparation for shipment.

For these reasons, we strongly urge APHIS to adopt the more preferred method of assessment: Upon allowing them to be transported in commerce, it is preferred that all animals be allowed to nurse or be nutritionally supplemented until their weaning age. Individual species physical and social maturity must be the paramount considerations.

Thank you for considering our comments today.

Sincerely,

Allie Phillips, J.D.  
*Director of Public Policy*

Tracy Coppola, J.D.  
*Legislative Analyst*

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<sup>1</sup> Hau, Jann., Schapiro, Steven J., *The Welfare of Non-Human Primates*. The Welfare of Laboratory Animals (Springer Netherlands, 2004, p. 291-314).

<sup>2</sup> Reinhardt, V., *Artificial Weaning of Old World Monkeys: Benefits and Costs* (Animal Welfare Institute, p. 3). See also [www.awionline.org/Lab\\_animals/biblio/jaaws6.html](http://www.awionline.org/Lab_animals/biblio/jaaws6.html).

<sup>3</sup> Fulk, R., M. Loomis and C. Garland, *Nutrition of Captive Chimpanzees*, *The Care and Management of Chimpanzees in Captive Environments: Chimpanzee Species Survival Plan – Husbandry Manual*. (Fulk, R. & C. Garland, Eds.) (American Association of Zoos and Aquariums, 1992, p. 8). See also <http://www.nagonline.net/Diets%20pdf/Chimpanzee%20Nutrition.pdf>.

<sup>4</sup> Kline, Kevin H., *Reducing Weaning Stress in Foals*, (University of Illinois, 2005, p. 1). See also [www.livestocktrail.uius.edu/horsenet](http://www.livestocktrail.uius.edu/horsenet).

<sup>5</sup> Siegal, M., UC Davis School of Veterinary Medicine *Book of Horses: A Complete Medical Reference Guide for Horses and Foals* (UC Davis School of Veterinary Medicine, 1996). See also <http://www.infohorse.com/foalweaning.asp>.

<sup>6</sup> Meadows, D.G., Henton, J.E., *Weaning Management for Foals* (University of Tennessee Agricultural Extension Service). See <http://www.utextension.utm.edu/publications/animals/EquineFacts/TNH3004.pdf>.

<sup>7</sup> Andersin, T., Ahlfors, L., Kattilakoski, K. *Weaning & Selling Ages*, <http://www.hiiret.fi/eng/spiny/breeding2.html>.

<sup>8</sup> Main, R.G., Dritz, S.S., Tokach, M.D., Goodband, R.D., Nelssen, J.L., *Increasing Weaning Age Improves Pig Performance in a Multisite Production System* (Journal of Animal Science, 2004). See <http://jas.fass.org/cgi/content/abstract/82/5/1499>.