

Dr. Nancy Halpern  
State Department of Agriculture

Dr. Halpern:

Having read the proposed standards for the humane treatment of domestic livestock it is the opinion of this organization that the guidelines are extremely lax. Some of the proposals may even put animals at risk rather than protect them. The following points are of the utmost concern to our staff:

1. Shelter regulations are completely inadequate, trees should hardly be considered adequate especially where small animals or small numbers of horses or cattle are concerned.
2. Minimum scores for all animals are deplorable. A 2.0 score for horse is much too low, and market scores of 1.0 are nothing short of outrageous.
3. Transport and holding times with out food and water for all animals are entirely too long and pose a great danger to some. Horses for example will be susceptible to colic if kept without grazing for 28 hours. If market animals are as low as a 1.0 and the further compromised by these transport and holding times, they will certainly suffer a serious threat.
4. Pasture feeding guidelines are too vague for court proceeding purposes, as other food sources will not be required.
5. Poultry can be mailed?
6. Sharp objects in pastures and pens must be more than minimized, they must be removed.

The list could continue but it is very clear that these guidelines will severely limit the ability of our organization to protect our livestock. We sincerely hope that these proposed standards will not be passed as currently written.

Sincerely,

Beverly J Greco  
Dir. of Cruelty Investigations  
Cumberland County SPCA