



# Animal Welfare Institute

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April 25, 2023

Emily Yeiser Stepp  
Executive Director  
National Dairy FARM Program  
National Milk Producers Federation  
2107 Wilson Blvd., Suite 600  
Arlington, VA 22201

## **Via email and USPS**

Dear Ms. Yeiser Stepp:

I am writing on behalf of the Animal Welfare Institute (AWI) regarding the recent fire that occurred at South Fork Dairy in Dimmitt, Texas—reportedly killing 18,000 cows—and to once again encourage the National Dairy FARM Program to strengthen its standards on fire prevention and safety within its animal care guidelines.

AWI was founded in 1951 as a nonprofit organization dedicated to reducing animal suffering and promoting the welfare of animals, including those used in agriculture. For the past decade, AWI has tracked barn fire incidents in the United States, which have killed over 6.4 million animals during this time. We have published two comprehensive reports documenting the extent of the issue (the most recent version of which is provided for your reference) and contributed to a Fire Protection Research Foundation study on fires in animal housing facilities. We also currently serve on the National Fire Protection Association (NFPA) technical committee on animal housing, where we have worked with experts to make improvements to the *NFPA 150: Fire and Life Safety in Animal Housing Facilities Code*.

By our records, the South Fork Dairy fire is the deadliest fire involving cattle in the past 10 years, but certainly not the first. Over 7,300 cattle have been killed in other barn fires since the start of 2013. On dairy operations, at least 14 such fires have killed 100 or more cattle at once. The South Fork Dairy fire and the catastrophic fires before it speak to the failure of many agriculture operations that house large numbers of animals to properly implement fire prevention measures and suppression mechanisms. While we understand that not all accidents can be avoided, more can be done to reduce their likelihood and to save lives when they do occur.

We recognize that the FARM Program animal care standards require producers to have a written emergency plan that is expected to address fires. However, this recent incident clearly

demonstrates that this expectation alone is insufficient. During the last two cycles in which the FARM Program standards were up for revision, AWI argued for requiring additional fire safety measures—including that the standards require producers to undergo annual inspections, install smoke or heat detection systems, and place fire extinguishers at every exit. It appears these recommendations were not implemented.

In order to reduce the likelihood of future barn fires within the industry, we strongly encourage the FARM Program to revisit these recommendations and, at a minimum, require compliance with NFPA 150 going forward. Additionally, based on what was revealed in the aftermath of the South Fork Dairy incident, we recommend requiring evacuation plans for animals housed indoors (accompanied by routine drills),<sup>1</sup> establishing tighter limits on the number of animals housed in one building, and encouraging installation of fire suppression systems (e.g., sprinkler systems) in animal housing areas.

The magnitude of this event and the sheer number of animals involved has rightfully caught the attention of national media outlets and the public at large. It also prompted the Texas Department of Agriculture to issue a statement vowing to make the results of the investigation public so that lessons can be learned. It is critical that the industry is similarly willing to heed the warnings of this incident and do more to lessen the likelihood of another major fire. Many lives are at stake.

Thank you for your time; we hope that you will give our recommendations serious consideration. If you require additional information or clarification, please contact Allie Granger by phone at (202) 446-2139, or by email at [allie@awionline.org](mailto:allie@awionline.org).

Sincerely,

A handwritten signature in blue ink that reads "Susan Millward". The signature is fluid and cursive, with a small flourish at the end.

Susan Millward  
Executive Director

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<sup>1</sup> See Diel, Florian, et al. "Exploring the Evacuation of Dairy Cattle at Night in Collaboration with the Fire Brigade: How to Prepare Openings for Swift Rescue in Case of Barn Fire." *Animals* 12.11 (2022): 1344.