

Animal Welfare Institute

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August 9, 2022

David Millstein, Chief National Fire Data Center U.S. Fire Administration 16825 S. Seton Ave. Emmitsburg, MD 21727

Dear Mr. Millstein:

I am writing on behalf of the Animal Welfare Institute (AWI) regarding the issue of barn fires in the United States and the need to increase our understanding of the frequency of these events and the impact they have on farming operations through data collection.

AWI was founded in 1951 as a nonprofit public interest organization dedicated to reducing animal suffering and promoting the welfare of animals, including those used in agriculture. As part of our efforts to protect animals on farm, AWI has monitored the prevalence of barn fires across the country that impact hundreds of thousands of farm animals each year. As a member of the National Fire Protection Association's (NFPA) Technical Committee on Animal Housing Facilities, AWI has worked with experts to make improvements to the NFPA 150, Fire and Life Safety in Animal Housing Facilities Code that will better protect animals on commercial livestock and poultry operations. We have also published two comprehensive reports on the impacts of barn fires on farm animals (enclosed is the most recent edition of this report for your reference).

For several years, AWI has relied on media reports to develop an understanding of the issue of barn fires and the number of animals killed by them each year. In doing so we have determined that over 6 million animals have died in over 950 barn fires since 2013. These statistics represent a conservative estimate, as complete information on the number and species of animals killed in fires is not always available. Additionally, because reporting requirements generally don't exist, especially for barn fires and livestock losses specifically, it is entirely possible that there are fires and animal deaths that remain unaccounted for.

While local reporting of these incidents has allowed AWI and the public to recognize fires occurring on animal agriculture operations as a serious problem, relying on this mechanism as the only option for monitoring this issue provides an incomplete picture and hinders the ability of fire officials to fully understand the scope of the problem and respond accordingly. Thus, it is critical that the U.S. Fire Administration create a mechanism for uniform recording in a

centralized location of the number of animal fatalities resulting from fires and any other information deemed appropriate.

AWI recommends doing so through the National Fire Incident Reporting System (NFIRS), which currently does not seem to enable or encourage tracking of animal fatalities, but it can and should under section "H₁ Causalities" of the current module. To illustrate the problem and learn more about the nature of past barn fires, AWI submitted a public records request through the Freedom of Information Act for 48 incident reports submitted to NFIRS that involved barn fires on large operations—defined as those that killed 1,000 or more birds, 250 or more pigs, or 100 or more cows—between 2018 and 2020. Of the 21 incident reports that were provided, just 2 mentioned animal fatalities. Even in instances where 250,000+ animals were killed, there was no mention of fatalities in the incident report.

We acknowledge that reporting to NFIRS is voluntary, so this change may not fill in the informational gaps completely, but it would certainly be an improvement and increase understanding of the problem. Doing so may not only improve animal welfare, but also prevent a huge financial burden for farmers. According to the NFPA, between 2014 and 2018, barn fires caused an average of \$48 million in property damage annually.

Thank you in advance for your thoughtful consideration of our recommendation. Please do not hesitate to contact me at 202-446-2139 or allie@awionline.org if I can answer any questions or provide additional information.

Sincerely,

Allie Granger

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Policy Associate, Farm Animal Program