



**Mercy For Animals' Recommendations for a Mandatory
Animal Transport Training Program**

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Introduction

Canadians are increasingly conscious of the ethical and moral obligations inherent in raising animals for food.¹ Animals who are raised for food are sentient beings; they can experience fear, stress, pain, and even joy.² Accordingly, animal welfare is an important consideration for consumers when making food purchases. The Canadian Food Inspection Agency (CFIA) has recognized the importance of animal welfare to consumers, and in an effort to update the existing 40-year-old regulations, in December 2016 the CFIA proposed amendments to the Health of Animals Regulations, part XII, concerning animal transport.

The Health of Animals Regulations

Given that transport is undoubtedly one of the most stressful times in a farmed animal's life, highly skilled personnel are critical to upholding high animal welfare standards during transport. A positive human-animal interaction, which follows from good husbandry skills, can increase an animal's ability to tolerate stressors.³ Good husbandry skills are achieved through careful selection of workers and through quality training programs.⁴ The importance of the human-animal interaction in animal welfare is undeniable;⁵ thus, it is widely recognized that transporter training is an essential component of humane animal transport. Therefore, the CFIA has incorporated mandatory training into its recently proposed amendments to the Health of Animals Regulations, part XII. While the regulations have not been finalized, the final version is highly likely to include at least what was provided for in the original:

138 (1) Every commercial carrier shall train, or ensure that training is received by, its employees and agents or mandataries who take part directly in the loading, transportation or unloading of animals or who take part in decision making or advising the person operating the conveyance in respect of the loading, transportation or unloading of animals, so that they have the necessary knowledge and skills to conduct those activities in compliance with this Part.

(2) The training must cover the following subjects in respect of the species of animals being transported:

- (a)** animal behaviour;
- (b)** animal handling, restraint, loading densities and transportation methods;
- (c)** the contingency plans referred to in section 139; and
- (d)** the risk factors set out in section 140.

(3) Training of an employee or an agent or mandatory is not required if the commercial carrier verifies that the person already has the necessary knowledge and skills.

While the inclusion of mandatory training is indeed a step forward, Mercy For Animals recommends that the Canadian government oversee the creation of species-specific training programs that are mandatory for all livestock transporters regardless of experience level and require annual competence certification. This training must be mandatory for not only commercial carriers but all persons transporting any farmed species on a public road or highway, regardless of the size of vehicle used. To ensure enforcement of the transport regulations and to better distribute oversight, the CFIA must establish a training program for local law enforcement agencies regarding animal welfare during transport. This program will provide law enforcement with a thorough understanding of the animal transport regulations and train officials to identify animals who are not fit to travel and conditions that are not compatible with good welfare and to recognize animal suffering. These training programs will allow Canada to reflect the regulatory practice adopted in the European Union, which is supported through training for transporters and law enforcement by independent, nonprofit organizations such as [Eyes on Animals](#).

Knowledge and Skills / Training / Contingency Plans

Much of the needless cruelty and abuse inflicted on farmed animals is the result of inadequate training and supervision of factory farm, transport, and slaughterhouse workers. While the proposed regulations address these important issues, they do not go far enough.

Annual trainings as outlined below must be provided to **all employees** who have any direct contact with live animals. **No exceptions should be made**, however knowledgeable or skilled an employee may be.

Livestock drivers must obtain an annual certificate of competence indicating training in and understanding of animal physiology, drinking and feeding needs, animal behaviour and stress, ways to reduce handling stress in animals, driving methods that uphold high welfare of transported animals,⁶ emergency care, euthanasia methods, a contingency plan in case of unexpected delays, and all other factors set forth in the proposed regulations, sections 138, 139, and 140.⁷

Transport companies must demonstrate sufficient and appropriate staffing and training, and they must provide supporting documentation to the CFIA upon request.

Transport Training in Canada

A nationwide training program should reflect the effective training programs that are currently in use by our trading partners. The CFIA has several cases to analyze and use as best practices to implement an effective and impactful training program that allows Canada to uphold animal welfare while providing skills

development for workers involved in the transport of animals. The CFIA must also consider Canadian organizations that have recognized the importance of appropriate training, to both the animal and the worker, and assist these organizations in making appropriate training a mandatory activity across the country. When creating a countrywide animal transport training program, the CFIA can conduct a deep analysis of effective training programs worldwide and then use that information to augment the training programs already used by the animal agriculture industry.

Transport Quality Assurance (TQA)⁸ training is required for transporters and handlers of pigs who are hauled into most, but not all, processing plants. The TQA course is species-specific and includes training on pig behaviour; handling; facilities and equipment; loading, unloading, and transportation; fitness of the pig; biosecurity; emergency response; and laws, regulations, and audits. Key components of the course include training on recognizing when a pig is fearful, loading and unloading pigs in a way that causes the least amount of stress, optimizing pig comfort depending on temperature, assessing fitness for transport, and understanding the key issues that cause pigs to die during transport. To optimize welfare through this training program, training specific to journey length, including food and water needs, should be added. TQA training does not include any hands-on training component.

A quality-assurance transporter training [program](#) exists for poultry transporters in Ontario and is supported by the **Poultry Service Association**.⁹ The program includes training on humane handling; biosecurity; preparing birds for transport and fitness for transport; impacts of weather and stocking density; specific transport needs of pullets, breeders, layers, broilers, and turkeys; signs of overheating, chilling, and lack of oxygen during transport; and emergency preparedness. As with the other programs mentioned, this educational program is deficient in certain areas, such as animal behaviour and impact of journey duration.

Finally, the **Canadian Livestock Transport (CLT)**¹⁰ certification [program](#) has both online and classroom species-specific training modules for cattle, sheep, hogs, horses, and poultry. Topics include preloading, loading, transit time, animal welfare, regulations, handling and behaviour, environmental considerations, equipment, and emergency response.

To ensure full retention of information, hands-on training should be included for all people who interact with animals.

Transport Training Around the World

Additional animal transport training materials are available in other countries. The following are exemplary resources for building better animal welfare training programs for the transport of live animals in Canada:

In the United States, **Beef Quality Assurance**¹¹ is a similar training program for beef cattle, which can be taken [online](#). The training includes information on biosecurity, animal handling, loading and unloading,

weather, and truck and trailer maintenance. It is essential that training programs for transporting cattle include training on appropriate loading densities.

Detailed information on animal transport training has been compiled by the European Commission and Wageningen University in the Netherlands and can be found [here](#). These documents¹² contain information vital to a well-informed animal transport training program.

MFA Recommendations

Species

Training should be prescribed according to species. If a transporter carries more than one species, he or she must receive training and annual certification for each species.

Training Program Areas for Transporters and Animal Handlers

The areas that should be covered in the mandatory training are as follows:

1. Animal Behaviour: Species-specific training in animal behaviour is arguably the most important part of transport training and should be featured in all topics covered. Animals exhibit stress very differently from humans; stress is often exhibited through panting or vocalizations, but sometimes indicators of stress are far less overt. Livestock transporters must be able to understand how animals communicate with humans, which is best achieved through a good understanding of animal behaviour.
 - The European Commission's pig transport guide¹³ illustrates how training in animal behaviour must be included throughout all transporter training topics, including handling; monitoring pigs during transport; and assessing the impact of journey length, environmental conditions, and stocking density.
 - In addition to including animal behaviour education throughout the training protocol, the most recent TQA handbook¹⁴ includes a separate section on behaviour, and even places it at the beginning of the training program. The handbook includes valuable education on how pigs communicate with humans through behaviour (e.g., pigs showing mild fear raise their heads and ears; see figure 1 in appendix). No transporter should handle animals without a clear understanding of this critical knowledge.
2. Animal Handling and Restraint: Loading and unloading are the most stressful parts of transport. Animal handlers need to understand how to work with an animal's flight distance, point of balance, and herding instinct to calmly and safely move animals onto and off trucks. Science tells us that loud noises are distracting, and evidence supports

the need to ban electric prods. For poultry, handlers need to understand how to catch, load, and unload birds in a way that reduces stress.

- The European Commission's guide for transporting poultry¹⁵ illustrates how poultry should be caught and placed into transport crates, stressing that "Appropriate handling does not stress or injure the animals" (figure 2 in appendix). See pages 29-32 of the guide.
3. Loading Densities: This section will be updated once the final regulations have been promulgated and we have a better understanding of the training necessary to determine appropriate stocking densities.
 4. Journey Duration: This section will be updated once the final regulations have been promulgated and we have a better understanding of the training necessary to determine the impact of journey duration. If the proposed regulations are accepted, it will be necessary to create information in the training programs that is specific to short versus long journeys.
 5. Environmental Conditions: This section will be updated once the final regulations have been promulgated and we have a better understanding of the training necessary to determine how different weather conditions impact on-board environment.
 6. Ramp Slope: This section should include training on the slopes outlined in the regulations, the animal welfare impacts of ramps that are too steep, and how ramp slope affects animal behaviour and animals' willingness to be loaded or unloaded.
 - The TQA handbook¹⁴ illustrates how to determine ramp angles to ensure that equipment meets necessary specifications (figure 3 in appendix).
 7. Fitness for Transport: In order to avoid intense animal suffering and high numbers of animals dead on arrival, it is essential that transporters have expert knowledge on this topic. Transporters need to understand how to assess the status of a compromised or unfit animal, how to determine whether an animal can be loaded, and what to do if an animal becomes compromised or unfit during transport. A veterinarian should be consulted if any uncertainty exists or if the animal exhibits difficulty walking.

- While both TQA¹⁴ and the European Commission¹³ address fitness for travel, neither training program addresses this topic with the necessary weight or detail. Furthermore, the proposed Health of Animals Regulations go into extensive detail regarding the definition of both compromised and unfit animals. Such detail will need to be included in this section of the countrywide training program.
8. On-Board Food and Water: This section will be updated once the final regulations have been promulgated and we have a better understanding of the training necessary to determine when animals need food and water.
 9. Emergency Preparedness: Transporters must be trained in contingency planning as well as how to respond to unexpected circumstances.
 - While the TQA program¹⁴ has an informative section on emergency preparedness, we also recommend that transporters fill out a mandatory contingency plan prior to travel, similar to the form required in the United Kingdom (figure 4 in appendix).¹⁶ This form should be presented to the CFIA or law enforcement at any time during or after travel.

Training Program Areas for Law Enforcement

While it is not imperative that law enforcement officials receive the full training program outlined above, effective enforcement of the regulations is contingent upon law enforcement officials who fully understand the animal transport regulations, are able to identify animals who are not fit to travel, are able to identify conditions that are not compatible with good welfare, and can recognize animal suffering. To distribute enforcement oversight, MFA recommends that the CFIA create a law enforcement training program to be administered to all RCMP and work with the provinces to administer the program to provincial law enforcement. [Eyes on Animals](#) is a nonprofit organization that has trained law enforcement officials across Europe and can be a source of guidance for the CFIA in creating a program capable of ensuring regulatory enforcement nationwide.

Conclusion

MFA acknowledges the importance of agriculture to Canada's economy and applauds the government for updating the long-outdated transport regulations. But change will only occur if those who transport animals are provided with the skills and training that reflect the modernized regulations.

It is now time to ensure that the individuals who drive these transport trucks are properly trained and licensed and that there are dissuasive fines and penalties for noncompliance with the standards laid out in the regulations. In the same way that the government requires special licensing for cars, trucks, and motorcycles, the government must also require special licensing for livestock transporters. A nationwide species-specific training program that is updated on an annual basis will not only create a labour force that reflects Canadians' changing attitudes toward farmed animals, but help the government achieve its stated goal of developing skills and updating the workforce, allowing Canada to better compete on the global stage.

Given that 77 percent of Canadians believe that transporters should receive specialized, species-specific training regarding the humane transport of farmed animals,¹⁷ it is imperative that the government act now to provide transporters with this training. The Canadian government has the opportunity to provide transporters and law enforcement with the training and tools necessary to address domestic concerns about animal welfare while exceeding the standards set by our trading partners—allowing Canada to become a leader in the humane transport of animals. As Canada continues to negotiate and implement new trade agreements, such as the Comprehensive Economic Trade Agreement with the European Union, our legislation with regard to animal transport must move from voluntary guidelines to regulated and enforceable training that reflects the standards of our trading partners and ensures that Canada's exports reflect domestic and international concerns regarding animal welfare during transport.

Supporting Information

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9. *Poultry Handling and Transportation Manual*. (Poultry Service Association).
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13. *Guide to good practices for the transport of pigs*. (European Commission, 2017).
14. *Transport Quality Assurance Handbook*. (Pork Checkoff, National Pork Board, 2014).
15. *Guide to good practices for the transport of poultry*. (European Commission, 2017).
16. *United Kingdom Animal Transport Certificate and Contingency Plan Template for a Specific Journey*. (Animal & Plant Health Agency, Department for Environment, Food and Rural Affairs, Scottish Government, Welsh Government, 2017).
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Appendix

Figure 1. Understanding pig communication through behaviour. The Transport Quality Assurance Handbook, version 5, page 8.

Pigs can communicate their level of fear with their heads, eyes, ears and body movements. Signs of increasing fear when we are moving pigs:

Pigs that are calm:

- Able to stay a safe distance from the handler and get release from handler's pressure
- Head and ears low, body relaxed
- Moving at a walk or trot, (or exuberant outbursts if excited but not scared)
- Attention mostly forward
- Any vocalizations are low pitched

Pigs showing mild fear or defensiveness:

- Handler is getting too close / not giving enough release from pressure
- Heads and ears rising
- Still moving away but with increasing attention towards the handler
- Flight zone is expanding
- Possible brief increase in speed
- If you release pressure the animal will calm down
- If you maintain or increase pressure, the animal may become fearful or defensive

Pigs showing heightened fear or defensiveness:

- Handler is too close / using too much pressure and animal is unable to get release
- Full attention is on the handler
- Pig's efforts to move away aren't working so it switches to alternative tactics: stop, back up, turn back, try to get past the handler or...
- Shut down and refuse to move – a defensive response different from being too tame or fatigued
- If you release pressure the animal will calm down but may require some time to do so
- If you maintain or increase pressure, it may escalate to extreme fear
- Bunching up and difficult to sort or separate

Pigs showing extreme fear or defensiveness:

- Panic
- Willing to run under, over, or through handlers and obstacles
- Scrambling, out of control movement
- High pitched vocalization
- Possibly leading to severe stress symptoms including death
- Bunching up and difficult to sort or separate

Figure 2. Better catching and handling practices for chickens. The European Commission's poultry transport guide, page 29.¹⁵



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Figure 3. Determining ramp slope for loading and unloading. The Transport Quality Assurance Handbook, version 5, page 22.

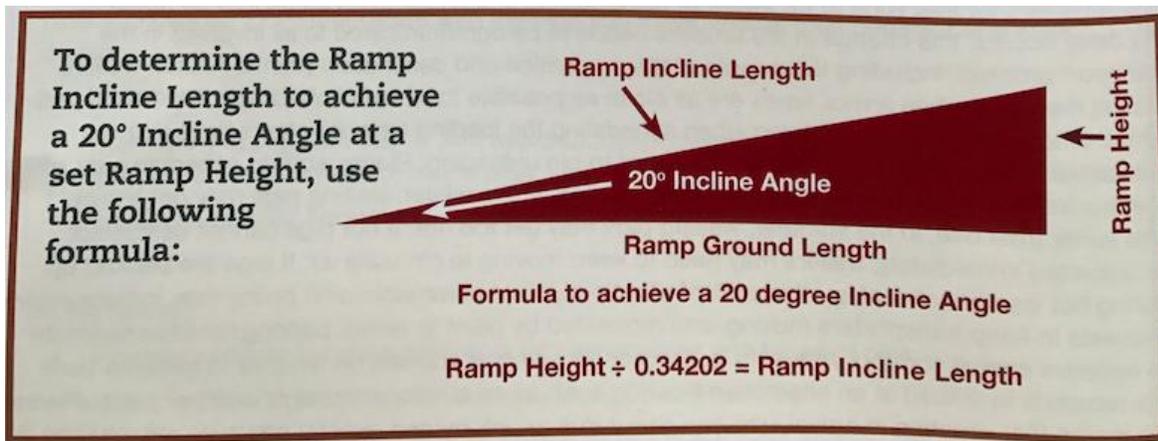


Figure 4. United Kingdom Animal Transport Certificate and Contingency Plan Template for a Specific Journey.

Department for Environment, Food and Rural Affairs
 Scottish Government
 Welsh Government

Council Regulation (EC) 1/2005



United Kingdom Animal Transport Certificate and Contingency Plan Template for a Specific Journey

Please complete this Animal Transport Certificate and Contingency Plan for all animal movements as part of an economic activity on journeys over eight hours in duration (except where a Journey Log is required).

Section 1 – Animal Transport Certificate Article 4 of Council Regulation (EC) 1/2005

1. Full name and address of transporter*
 [Text box]
 Postcode [Text box]
 Telephone No. [Text box]
 Fax No. [Text box]

2. Full name and address of owner of animals* (if different to section 1)
 [Text box]
 Postcode [Text box]
 Telephone No. [Text box]
 Fax No. [Text box]

3. Registration number of vehicle and trailer
 [Text box]

4. Species of animals [Text box]

5. Number of animals [Text box]

6. Health status of animals (please tick health status that applies)
 Slaughter Production/Fattening Breeding Other (please specify)

7. Full address of place animals loaded* (if different to section 1 or 2)
 [Text box]
 Postcode [Text box]

8. Full address of final destination*
 [Text box]
 Postcode [Text box]

9. Date of loading [Text box]

10. Time first loaded [Text box]

11. Date and time of departure* [Text box]

12. Estimated duration of journey* [Text box]

13. Time(s) and place(s) where rest stops taken, including if the animals were offered liquid and/or fed
 [Text box]

14. Date last animal unloaded [Text box]

15. Time last animal unloaded [Text box]

*Mandatory information

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Section 2 Contingency Plan Article 11 1.b (iv) of Council Regulation (EC) 1/2005

Please provide Contact Details and Telephone Numbers for:

1	Ferry companies if the journey involves sea crossings	
2	Local APHA office for the departure premise	
3	Local APHA office at the exit point from the UK	
4	Veterinarian at the departure premises	
5	Local Authority at the departure premises	
6	Local Authority at the exit point from the UK	
7	Police	
8	RSPCA and Scottish SPCA or other organisations that may be able to assist in the event of an emergency	
9	For transporters reliant on additional modes of transport (e.g. ferry, air and/or rail), the name and address/es of contingency premises to be used in the event of delay	
	Transporter Signature	
	Name in BLOCK LETTERS	Date

FAIR PROCESSING NOTICE

Defra, the Scottish Government, the Welsh Government and the Food Standards Agency are Data Controllers in Common in respect of personal data processed by the Animal and Plant Health Agency (APHA). For the purposes and usage of the data by APHA and the data sharing arrangements, please see the APHA Personal Information Charter on GOV.UK. A hard copy of this can be provided if required; please contact your local APHA Field Service office. APHA will not permit any unwarranted breach of confidentiality or act in contravention of their obligations under the Data Protection Act 1998. APHA is an Executive Agency of the Department for Environment, Food and Rural Affairs and also works on behalf of the Scottish Government, Welsh Government and Food Standards Agency.

Notes

- Article 4 of Council Regulation (EC) 1/2005 requires that the information relating to the journey as indicated by an asterisk in the form overleaf is provided for all journeys. Farmers are exempt from carrying documentation stating this information when transporting their own animals in their own means of transport on journeys up to 50km (31.25 miles) from their holding, or as part of seasonal transhumance.
- This form is offered as an option if you are transporting any vertebrate animals **other than** Cattle, Sheep, Goats, Pigs and Unregistered domestic Equidae on journeys over eight hours between EU Member States or between EU Member States and Third Countries and for which contingency plans are also required by the Regulation. You may record the information in any other format (e.g. on a delivery note or an Animal Movement Licence).
- The information at note 1 above must be made available to an inspector on demand who must be allowed to take a copy.
- Information not marked with an asterisk is voluntary and not required by law. However, its completion is designed to help demonstrate that the journey and, in particular contingencies, have been planned in accordance with the Regulation.
- This form (or the required information if kept in another format) must be retained by transporters for six months after completion of the journey.
- It is an offence to provide false information.
APHA is an Executive Agency of the Department for Environment, Food and Rural Affairs and also works on behalf of the Scottish Government, Welsh Government and Food Standards Agency to safeguard animal and plant health for the benefit of people, the environment and the economy.