

MERCY FOR



ANIMALS

**Mercy For Animals
Pre-budget 2018 Submission**

August 4, 2017

About: Mercy For Animals is an international animal protection organization dedicated to preventing cruelty to farmed animals and promoting compassionate food choices and policies.

Mercy For Animals would like to thank the Standing Committee on Finance for the opportunity to participate in the consultation in advance of the 2018 Budget.

Introduction: Humane Transportation of Animals

Canadian laws governing the transportation of farmed animals are arguably the worst in the Western world. Transportation exposes animals to unique stressors that severely compromise their well-being. In 2015, more than 9 million farmed animals arrived at Canadian federally inspected slaughterhouses dead or so sick or injured that they were declared unfit for human consumption. According to the regulatory impact analysis accompanying the proposed regulations on animal transportation, roughly 14 million farmed animals experience undue suffering each year during transport, with about 1.59 million dead on arrival.

These bleak facts stand in stark contrast to the expectations of the Canadian public regarding the government's obligation to ensure humane treatment in all phases of animal agriculture. A survey commissioned by MFA in 2015 documents that 97 percent of Canadians believe Canada's transport regulations must be updated to ensure farmed animals are transported in a safe and humane manner and that 81 percent believe humane transport is *extremely* or *very important*. Ninety-five percent of Canadians surveyed agree that even if protecting farmed animals from weather extremes and providing them with food, water, and rest during transport mean higher costs for livestock producers, transport companies, and consumers, ensuring animals are treated humanely is still important.

While the government continues to focus on food safety, food poverty, and food policy, there is a disconnect between promise and practice in terms of implementing policies and processes that would allow for efficient transportation of farmed animals while addressing animal welfare and decreasing food waste.

How does Canada compare to the world?

Canada's current Health of Animals Regulations concerning transportation of animals reflect that they were last updated 40 years ago. Animal welfare science, livestock genetics, and technology have changed tremendously in the past four decades. Given the infrequency of updates to these regulations, the proposed changes must substantially improve animal welfare and make Canada a leader on the world stage. As proposed by the Canadian Food Inspection Agency, the regulations would hinder Canada in becoming the example of humane animal transportation and allow other nations to advance in this area. As we strengthen our economic and social justice ties with other nations and engage in trade agreements with the EU through CETA, it is imperative that our trade partners see Canada as an equal regarding humane animal transportation.

The CFIA proposes to reduce the maximum time an animal may be without feed, water, or rest from more than 52 hours to a still-lengthy 36 hours. The EU has enforced regulations in place that do not allow transport of animals without feed and water for longer than eight hours. Even outdated regulations in the United States (passed in 1873) limit journey duration to 28 hours. The EU requires transporters to keep onboard temperatures within the enforceable limits of 5°–30°C and to monitor onboard temperatures using thermometers and a driver alert system. The CFIA fails to enforce any temperature regulation by simply asking that the industry self-police and not transport animals when those animals are likely to suffer, become injured, or die as a result of weather. There is no requirement that drivers monitor the temperatures on board the

truck. Given the variable nature of onboard temperatures, this proposed regulation creates dangerous transport conditions for animals.

As to stocking densities, while the EU imposes strict, species-specific, science-based guidelines regarding the number of animals who can be loaded on a truck, the CFIA seeks to “improve” its regulation by simply prohibiting overcrowding that causes injury or death. To be enforceable before animals suffer or die, the CFIA regulation must set clear limits on stocking densities.

Available throughout Europe is a program to train local police agencies and transporters, as government supervision is often understaffed or ineffective. Watchdog group Eyes on Animals offers training courses on EU legislation and animal welfare to highway police in different countries; encourages international livestock companies to offer drivers animal welfare workshops; works with other animal welfare organizations and political parties; organizes a taskforce of international experts and veterinarian inspectors to share and exchange experiences; and engages in constructive discussions with livestock drivers, farmers, and managers of livestock markets and slaughterhouses to promote best practices for better animal welfare. Unfortunately, the CFIA does not have the resources or government programs to support local police agencies or ensure drivers for transport companies have the appropriate training to prepare contingency plans or recognize unfit or compromised animals and the conditions that could lead animals to become unfit or compromised.

Canadian Regulations

The CFIA is responsible for animal welfare during transport as specified in the Health of Animals Regulations Part XII: Transportation of Animals, which governs humane transportation of animals in Canada. In December 2016, amendments to the regulation governing transportation of animals, CG1: Health of Animals Regulations Part XII: Transportation of Animals-Regulatory Amendment, were published. CG2 is expected later this year, which will apply a one-year grace period for implementation.

CG1 offers regulatory amendments regarding training of “each person involved in and responsible for operating a conveyance with live animals on board,” stating that each person “must be trained and know how loading, protecting, preparing, monitoring and driving affect animals during transport” and that each person must have “the appropriate skills to drive the conveyance with an animal load in a way to minimize the negative effects on the animals.” Training topics are addressed in sections 138 through 140 of the Regulations Amending the Health of Animals Regulations.

Training and skills development of everyone involved in transportation of animals are imperative to adoption of the proposed amendments. This includes police and peace officers who inspect transport trucks.

To enforce these amended regulations, police service and peace officers must be trained to both understand the regulations and identify cases of inhumane transport. To establish and maintain Canada’s competitiveness regarding international standards, training for police services and transporters must be species-specific, occur annually, and reflect evolving research and development in animal welfare science and industry practice. This training program must be developed by the CFIA for both transport companies and enforcement agencies.

Recommendation: MFA recommends that the government of Canada implement and enforce an annual mandatory training program, per sections 138 through 140 of the Health of Animals Regulations Part XII, to be provided by transport companies to all employees, regardless of previous knowledge or skillset. Companies must update their training annually to include species-specific advancements in transportation of animals. In conjunction, we recommend that the government of Canada work with provincial and municipal governments to create and implement a program that trains police and peace officers on the regulations and ways to identify inhumane animal transportation practices.

Training

Transportation: Knowledge and Skills / Training / Contingency Plans

Much of the cruelty and abuse inflicted on farmed animals is the result of inadequate training and supervision of transport workers. Also, the regulations do not take into account the innovations in humane animal transportation in both equipment and practices. These should be shared and adopted by the industry, as is standard practice in the EU, on a yearly basis. Because animal welfare science is constantly evolving, annual trainings as outlined below should 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.

Drivers must obtain an annual certificate of competence indicating training in and understanding of animal physiology, drinking and feeding needs, animal behavior and stress, ways to reduce handling stress in animals, driving methods that uphold high welfare of transported animals, emergency care, euthanasia methods, and a contingency plan in case of unexpected delays. Training must be species-specific, as different livestock require different conditions to ensure humane transport.

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

Enforcement: Knowledge and Skills / Training / Contingency Plans

Currently, the CFIA enforces Part XII of the Health of Animals Regulations with the assistance of the Canada Border Services Agency. Provincial police, the Royal Canadian Mounted Police, and other peace officers may also be called to provide assistance. The Criminal Code can also be applied in situations where animal abuse occurs. MFA recommends a training program be developed by the CFIA for provincial police, the Royal Canadian Mounted Police, and other peace officers that would provide them with the knowledge and skills required to recognize transport of an unfit animal or transportation conditions that do not adhere to the regulations set forth in Part XII of the Health of Animals Regulations.

Cost-Benefit

The costs associated with training transporters would apply to about 1,252 businesses in Canada, including the following:

- Commercial carriers transporting livestock (pigs: 480 businesses, horses: 96 businesses, cattle: 470 businesses, sheep/goats: 71 businesses)
- Commercial carriers transporting poultry (135 businesses)

Employees would receive skills training that would enable them to perform their jobs more effectively and humanely. Certification for each species would be updated annually to ensure that transporters received training on new advancements in the industry and that the industry as a whole remained up-to-date, compliant, and competitive with our international trading partners.

MFA proposes that this become a federal government-led program, in conjunction with the CFIA's current mandate. Currently, training programs such as the Canadian Livestock Training (CLT) program provide drivers with required competencies referred to in the amended Health of Animals Regulations and are referenced for training costs as follows: A driver's training course costs \$235, an annualized value of \$26,953 for all affected stakeholders.

There are no programs in Canada that train police in humane transportation of animals. The CFIA has allotted 12 months for implementation of the proposed regulations, however, which would allow federal and provincial enforcement agencies to adopt educational programs that would train police and peace officers in species-specific transportation practices.

Conclusion

The Canadian government is responsible for ensuring humane treatment of farmed animals. This expectation of the Canadian public must be honoured and the competitiveness of Canadian agriculture ensured. To uphold the modernized regulations under the Health of Animals Regulations Part XII, training programs must be adopted and enforced for both industry and police services. Through the creation and enforcement of these programs, not only will industry have the power and knowledge to improve its practices, but the men and women of Canada's police forces will have the knowledge and tools required to uphold the law.

The question is not whether the federal government should act to address animal suffering during transport; it has already chosen to take action. The question is whether that action will be based on sound policy and evidence-based recommendations, whether it will be future-looking, and whether it will actually protect animals from cruel treatment.

Without a government-led training program for police services and an annual species-specific training program applied by transportation companies, the attempt to modernize Canada's transportation regulations and practices will dissolve.