

January 18, 2017

Dr. Cornelius F. Kiley
National Manager
Animal Welfare, Biosecurity and Assurance Programs Section
Canadian Food Inspection Agency
59 Camelot Drive, 3rd Floor East, Room 231
Ottawa, Ontario
K1A 0Y9

Dear Dr. Kiley,

Re: *Canada Gazette*, Part I, Regulations Amending the Health of Animals Regulations, Dec.3, 2016

As an organization dedicated to the humane treatment of animals, the Vancouver Humane Society (VHS) would like to provide feedback on behalf of our 6,000+ supporters on the recently proposed amendments to the "[Health of Animals Regulations](#)". We commend you for bringing this important issue forward and appreciate the opportunity to provide input.

Canada's farmed animal transport regulations are among the most outdated in the Western world and a recent [poll](#) suggests the vast majority of Canadians support stronger rules to ensure farmed animals are transported safely and humanely.

It's unacceptable then that the Canadian Food Inspection Agency's (CFIA) long awaited amendments continue to fall short of protecting farmed animals from suffering, injury and death during transport. According to the CFIA, "98% of all shipments are already in compliance with the proposed amendments", meaning that very little will change for the 700 million farmed animals who undergo transport every year in Canada; 14 million of whom become sick or injured in the process and 1.5 million of whom die en route.

It's our opinion that your self-stated objectives, such as clarifying expectations, better reflecting new science, aligning Canada's requirements with those of other jurisdictions and satisfying Canadian societal expectations regarding the responsible care of farm animals and the humane treatment of animals during transport will not be met by your proposed changes to the Health of Animals Regulations in any meaningful way.

Key concerns, listed below, are not sufficiently addressed in these proposed amendments. We've included our recommendations for your consideration.

- **Lengthy transport times:** The draft rules continue to allow farmed animals to be transported for unacceptable durations without food, water or rest – including up to 24 hours for broiler chickens, spent egg-laying hens and rabbits; 28 hours for horses and pigs; 72 hours for day-old chicks, and 36 hours for all other animals. VHS recommends a maximum transport time of 8 hours without food, water and rest for all species. This would bring Canada in line with European Union requirements.

The draft rules propose that "compromised" animals be transported for up to 12 hours without food, water and rest. VHS recommends that at the very least, compromised animals be

transported no longer than the above suggested eight hour maximum. It is essential that special consideration be given to spent hens and cull dairy cows, given that by the nature of their physical condition at the end of their “productive” lives, they will be more prone to suffering, injury and death during transport. VHS feels strongly that regulations concerning “compromised” animals should automatically include all spent hens and all cull dairy cows. In the case of both species, efforts must be made to identify closer options for slaughter in order to reduce the transportation distance and prioritize these animals, who are at severe risk for further suffering.

- **Improper ventilation and exposure to extreme weather:** The draft rules fail to address the issue of poorly-ventilated transport trucks and exposure to the elements that can result in significant suffering, injury and death for farmed animals during transport. VHS recommends Canada follow the lead of the European Union in requiring temperature-controlled systems that not only ensure trucks are properly heated, cooled and ventilated, but also independently record this data for record-keeping purposes. VHS also recommends that animals not be transported during extreme weather.
- **Overcrowding:** The draft rules fail to provide specific space requirements that will prevent overcrowding. VHS recommends measurable loading densities to be outlined in the regulations, to bring Canada in line with European Union requirements.
- **Loading methods:** The use of electric prods, along with handling techniques that are likely to cause suffering, injury and death (e.g. carrying/tossing birds by their legs/wings) should be prohibited. VHS recommends technology, such as hydraulic lift systems, be prioritized in order to reduce additional stress during loading.
- **Tusk removal:** The draft rules continue to allow the de-tusking of boars prior to transport. This process involves cutting the animals’ nerve-filled teeth down to the gum line without the use of painkillers. VHS recommends boars be transported separately, as is done in the European Union, and the practice of de-tusking be prohibited.
- **Driver & transport company training/certification:** In order to ensure industry-wide consistency, VHS recommends that a third party training and certification process be required in order to properly train drivers and companies in animal welfare, safe handling and driving.
- **Record-keeping:** There remains no method for substantiating transport records, which are currently self-reported by the commercial carrier, the shipper of the animals and the receiver. VHS recommends an independent electronic system be required that can verify important details, including travel times, temperatures, speeds, distances and opening/closing of loading door. This will help ensure compliance with regulations.
- **Enforcement:** It’s crucial that the updated transport regulations be paired with stronger enforcement and appropriate penalties in order to effectively discourage violations

We understand that these suggested changes will require an expenditure of time, effort and money on the part of producers. Therefore, we realistically would expect there to be phase-out periods to allow for the replacement of equipment, phase-in of new standards, etc.

It's time Canada's transportation regulations align with the values of today's society. Through scientific research, we are discovering the depth of animal sentience and the public is increasingly concerned with the humane treatment of animals.

Thank you for your consideration of these recommendations and for providing the opportunity for feedback.

Sincerely,

Debra Probert
Executive Director
Vancouver Humane Society