



October 7, 2016

Mr. Bruce Archibald
President
Canadian Food Inspection Agency
1400 Merivale Road Tower 1, Floor 6, Room 100
Ottawa, Ontario K1A 0Y9

Dear Mr. Archibald,

Re: Proposed changes to livestock transportation rules under the Health of Animals Act

On behalf of the Beef Farmers of Ontario (BFO) and our producer members, I am writing to you today to express our concerns with the proposed changes to livestock transportation rules under the *Health of Animals Act*. BFO represents 19,000 beef producers in Ontario by advocating in such areas as policy planning, industry development and research, animal health and care, environment and food safety.

Transportation is a critical component of the beef production system in Canada. Minimizing stress and preventing injury of animals during transport is of utmost importance to farmers, livestock transporters, the broader industry and the general public. When concerns involving the welfare of animals during transport are identified, BFO acknowledges its responsibility to consider and offer its perspective to all stakeholders having an interest in the welfare of animals. BFO is respectful of the leadership roles of the government agencies charged with monitoring animal welfare and regulating and enforcing livestock transportation laws in Canada.

In the spring of 2016, the Canadian Food Inspection Agency (CFIA) presented proposed changes to livestock transportation rules under the *Health of Animals Act* to the Beef Value Chain Roundtable.

Under the proposed changes that were presented to industry, the maximum number of hours that cattle could be on a conveyance without food, water or rest (FWR) would be reduced from 48 to 36 hours with no additional grace period. The current regulations allow for the transport of cattle without FWR for an additional 4 hours if the trip can be completed within 52 hours. In addition, the presented proposal also included an increase in the minimum number of hours that cattle must be fed, watered and rested after reaching the maximum conveyance time without FWR, from 5 to 8 hours.

BFO is not opposed to changes to cattle transport regulations provided they are based on sound, science-based evidence that clearly demonstrates how the changes would irrefutably improve animal welfare, with all considerations taken into account, and that ultimately provide the highest percentage of positive outcomes for transported animals.



Current statistics on cattle transport in Canada confirm that over 99% of all cattle arrive at their destination safely and without incident.¹ Any proposed changes must therefore demonstrate how the amended regulations will actually reduce stress on transported animals without increasing the incidents of injury. In other words, the regulations must be outcome based, not prescriptive. For example, unloading and reloading cattle is viewed to be more stressful for the animals under certain conditions than extending the amount of time in transit without FWR. Further research is needed to better understand the relationship between loading, unloading and reloading animals and the associated animal welfare outcomes among different classes of animals. It would be premature for government to initiate changes to cattle transport rules before these critical questions are addressed.

It must also be stated that BFO does not agree with CFIA's assertion that previous national consultations in 2014 found that *"the reduction of time from 52 to 36 hours did not appear to add additional burden to the cattle industry."* While it may be true that the majority of cattle transported in Canada spend less than 30 consecutive hours in transit, a disproportionate amount of those that do spend more than 30 hours in transit are destined for Ontario feedlots and Ontario processing facilities. As Canada's 2nd largest feeding and processing jurisdiction, more than 300,000 animals from Western Canada and the Maritimes are imported into Ontario on an annual basis. As such, BFO is concerned about the impact the proposed changes will have on the competitiveness of the Ontario beef industry and views the proposed reduction in maximum transport times as problematic for several reasons:

- Applying a single maximum travel time to all classes of cattle is inappropriate. Research by Schwartzkopf-Genswein, Faucitano, Dadgar, Shand, Gonzalez and Crowe (2012) found that *"adverse effects of transportation on welfare vary by animal type"* (p.231).² Any change in the maximum allowable time in transport without FWR must recognize the needs of various classes of animals. Australia's cattle transport regulations, for example, differentiate maximum transports times based on age and type of cattle being transported. Canada should explore similar policies.
- Focusing solely on maximum transport times is also inappropriate. As Schwartzkopf-Genswein et al., (2012) argue, stocking densities, trailer microclimate and transport management factors have as significant an impact on animal welfare outcomes as does maximum time in transport.³ These additional animal welfare metrics must be incorporated into any discussion regarding regulatory changes.
- The Canadian cattle industry's geography, markets and climate are much different from other cattle jurisdictions, such as the European Union's, which BFO believes has limited applicability in the Canadian context. Discussions surrounding maximum cattle transport times must incorporate these factors into consideration and address the practical realities of the Canadian beef industry.
- A reduction in the maximum number of hours that cattle can be transported without FWR from 48 to 36 hours with no additional grace period will create logistical problems for feedlots, processors and other beef businesses importing cattle into Ontario. Currently, there is a lack of

¹ Schmid, K. (2016). Make the right choice in transport. Retrieved September 19, 2016 from the Alberta Beef Producers website, http://www.albertabeef.org/uploads/ABGrassRoutes_AprilMaycroppedpdf-541.pdf

² Schwartzkopf-Genswein, K.S., Faucitano, L., Dadgar, S., Shand, P., Gonzalez, L.A., & Crow, T.G. (2012). Road transport of cattle, swine and poultry in North America and its impact on animal welfare, carcass and meat quality: A review. *Journal of Meat Science*, 92(3), 227. doi:10.1016/j.meatsci.2012.04.010

³ *Ibid.*



suitable rest stations between Western Canada and Ontario. Reducing maximum transport times without the necessary infrastructure in place along major shipping routes will invite non-compliance and discourage long-haul transport and trade into Ontario.

As Flint, Schwartzkopf-Genswein, Bateman, and Haley (2014) argue, “further research is required to assess how well cattle are coping with long-distance transport under current regulations and industry practices” (p.63).⁴ Relevant research on animal welfare outcomes under the current regulatory framework for transport must be completed before changes to the transport regulations are considered.

Any change to the maximum number of hours that cattle can be transported without FWR should maintain a grace period, currently set at 4 hours, to account for unexpected delays in transport due to weather, traffic, mechanical failures, etc. Without the maintenance of the existing 4-hour grace period, we do not believe the proposed 36-hour maximum transport window to be feasible for Ontario from a commerce perspective.

While BFO will not oppose any changes to cattle transport regulations that are based on sound, science-based evidence that clearly demonstrates how the changes would improve animal welfare and that ultimately provide the highest percentage of positive outcomes for transported animals, we cannot accept any transport window less than 40 hours (be that a hard 40-hour window or a 36-hour maximum with a 4-hour grace period to account for transport delays) without enduring negative effects to the Ontario beef industry.

In the spirit of the Canada-United States Regulatory Cooperation Council’s mandate, BFO also recommends that CFIA and AAFC work with their counterparts at Global Affairs Canada to investigate the feasibility of livestock trucks traveling between Western Canada and Ontario being rerouted through the United States in order to avoid the longer northern route around the Great Lakes. Lengthy trips around the northern region of the Great Lakes add a significant amount of time to long-distance hauls across Canada, but this could be partially mitigated through an allowance to seal livestock trucks for short-term export and re-entry into Southern Ontario, with the help of the United States.

On behalf of the Beef Farmers of Ontario we thank you for your attention to this important matter. We would be pleased to meet with you or members of your staff at your convenience to discuss our comments and recommendations in further detail.

Yours sincerely,



Matt Bowman
President

cc: Hon. Lawrence MacAulay, AAFC
Oliver Anderson, AAFC
Mike Conlin, OCFA

Dan Darling, CCA
John Masswohl, CCA
Jim Clark, OCFA

Larry Schweitzer, NCFA
Casey Vanderploeg, NCFA
James Crawford, CFIA

⁴ Flint, H.E., Schwartzkopf-Genswein, K.S., Bateman, K.G., & Haley, D.B. (2014). Characteristics of loads of cattle stopping for feed, water and rest during long-distance transport in Canada. *Animals*, 4(1), p.62-81. doi:10.3390/ani4010062

