



CANADIAN VETERINARY
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Speaking notes submitted by
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on behalf of the

Canadian Veterinary Medical Association (CVMA)

To the House of Commons Standing Committee on Agriculture and Agri-Food
On Amendments to the Health of Animal Regulations (Humane Transportation)
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Representing The Canadian Veterinary Medical Association

Mr Chairman and Committee members, thank you for the opportunity to appear before your committee.

The Canadian Veterinary Medical Association (CVMA) provides a national and international forum for over 5500 veterinarians working in all of Canada's provinces and territories as private general and specialist practitioners, researchers, educators and public servants. Veterinary practitioners provide services to owners of pets, livestock and other animals.

The veterinary profession uses its scientific knowledge and skills for the benefit of animals and society in general.

Veterinarians promote animal health and welfare, strive to relieve animal suffering and protect public health.

Advances in animal health and welfare provide economic benefits to industry through:

- improved productivity (e.g. ensuring better animal welfare often means more meat, milk and fibre for producers to sell) enhanced product quality (for example, optimal transport conditions produce better quality meat)
- trade and consumer confidence (the public and international trading partners now more than ever take animal welfare into account when making decisions about what to buy and from where)

Veterinarians provide unique expertise on the health and welfare of all types of animals and have a professional obligation to ensure the welfare of animals

- We have specific expertise in animal health and disease
- Knowledge and understanding of the biology of domesticated animals
- Practical experience and understanding of the care and management of animals
- Practical experience in the recognition of the signs of suffering in animals

The CVMA seeks to promote animal welfare by:

- developing position statements on animal welfare issues
- participating in the National Farm Animal Care Council (NFACC) and their Scientific and Code of Practice Development Committees
- discussions and exchanges of information with relevant bodies, and by
- advocating for regulatory amendments, such as the Health of Animals Regulations on Transportation.

Animal welfare advocacy is a strategic priority for the CVMA

I am a member of the CVMA Animal Welfare Committee and a Professor at the Atlantic Veterinary College, University of Prince Edward Island where I hold a Chair in Animal Welfare. My main area of research is the transportation of animals.

The importance of animal welfare to society and our understanding of how animals respond to management practices, such as transportation, has increased considerably since the existing Health of Animals Regulations were written. They are in urgent need of revision.

As you will already have heard in the evidence presented, both transportation and animal welfare are complex issues, and different stakeholders adopt different positions on the regulatory amendments.

Scientific research on animal welfare has clearly demonstrated that mammals and birds have the capacity to suffer and that aspects of transportation can place animals at risk of suffering.

The role of legislation is to

- provide stakeholders with a framework of essential practices to adopt to reduce the risk of animal suffering
- provide commercial conformity when delivering these essential provisions, and
- provide a mechanism for dealing with non-compliance with these essential practices.

The good news is that if care is taken over the fitness of animals, the quality of the journey and the associated handling and management of the animals, many animals can be transported without experiencing severe welfare issues. However, situations are rarely ideal, and different types of animals are more susceptible to aspects of transportation than others.

Unfortunately, some animals experience suffering, and others die as a result of transportation.

There are patho-physiological and emotional aspects to suffering associated with transportation.

- Handling, loading and unloading, vehicle movement and interactions with other animals can cause injury, pain and discomfort.
- Restriction of feed and water during long journeys can result in hunger, weakness, exhaustion of body energy reserves, thirst and dehydration.
- Exposure to thermal extremes due to an inability of the transport arrangements to protect the animals from harsh external conditions, both hot and cold, and from the build-up of heat and moisture within the vehicle can cause thermal distress and death.
- Animals can experience fear and distress by exposure to novel factors and can develop fatigue during long journeys.
- Animals that are weak or suffering from disease or injury are
 - most likely experiencing welfare issues, such as pain and sickness before they are transported
 - likely to experience increased suffering because transportation will exaggerate pre-transport issues
 - less able to cope with challenges such as getting on and off of the vehicle, maintaining stability, avoiding fatigue, and coping with feed and water restriction and extreme thermal environments, and
 - likely to deteriorate during the journey and more likely to die in transit, become non-ambulatory or be euthanized on arrival than those that are healthy.

The regulations need to address these issues by defining how the management of the animals during transport can reduce the risk of suffering.

Unfortunately, the proposed amendments to the Health of Animals Regulations do not fully reflect international standards, scientific research and veterinary understanding of the implications of transporting animals.

Our main comments on the proposed regulatory amendments can be summarised as follows:

1. Fitness of animals for transportation

a. The CVMA believes that the proposed conditions listed in the “compromised” animal category should be re-considered and that many of these conditions should be placed in the “unfit for transport” category.

b. The CVMA generally supports the wording used in relation to “compromised animals” in the CFIA *interpretive guidance documentation for regulated parties*. However, it is the CVMA’s opinion that proposals that would permit the transport of animals for up to 12 hours with the types of conditions listed under the “compromised animal” category would result in considerable suffering.

2. Intervals that animals may be transported without feed, water and rest

a. The CVMA *strongly* supports the reduction in the time intervals that animals may be transported without feed, water and rest. However, it is the CVMA’s opinion that the proposed maximum intervals for animals are still longer than they should be to reduce the risk of suffering. In some situations, scientific research can provide evidence that indicates deterioration in animal welfare after a specific journey length. However, in most situations, the responses are linear and do not indicate a clear “cut-off-point”. Research on this and associated topics is under review by the NFACC Transportation Code Scientific Committee.

3. Suffering in animals during transportation

The CVMA believes that multiple approaches are required in the regulations to ensure that, even though an animal arrives at a destination “alive”, suffering has not occurred along the way.

In addition to proposed outcome-based measurements, the CVMA believes that weight must also be given to research evidence, professional advice, and opinion of veterinarians with respect to the assessment of suffering and the enforcement of Regulations. The CVMA *strongly* supports the removal of the term “undue suffering” from the current regulations and endorses its replacement with the word “suffering”. The CVMA considers that suffering occurs when an animal perceives pain or some other negative affect that is prolonged and that suffering can be associated with both physical and emotional disorders.

In addition, we made a number of detailed suggestions to various sections of the proposed regulations.

The CVMA encourages the federal government to dedicate the necessary resources for enforcement, training and research in order to implement and sustain the new Regulations so as to achieve the desired animal welfare outcomes.

The CVMA wishes to express its support for the general direction being taken by the proposed Regulations. However, the CVMA is strongly of the opinion that modifications are necessary to ensure that the new Regulations are effective and meaningful in strengthening the humane treatment of animals during transport. We look forward to working with the various stakeholders to develop solutions to the challenges of transporting animals, bringing to the table our knowledge, skills and experience as veterinarians.