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Chair

Mr. Pat Finnigan

Standing Committee on Agriculture and Agri-Food

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• (1100)

[English]

The Chair (Mr. Pat Finnigan (Miramichi—Grand Lake, Lib.)): Welcome, everyone, to our meeting on amendments to the health of animals regulations regarding humane transportation.

Today we have with us for the first hour, Mr. Jaspinder Komal, executive director and deputy chief veterinary officer, animal health directorate, Canadian Food Inspection Agency.

I believe you have a five- to seven-minute presentation, so we'll give you the floor.

Dr. Jaspinder Komal (Executive Director and Deputy Chief Veterinary Officer, Animal Health Directorate, Canadian Food Inspection Agency): Thank you, Mr. Chairman, and good morning.

[Translation]

My name is Jaspinder Komal and I am the executive director of the animal health directorate at the Canadian Food Inspection Agency.

[English]

It is a pleasure to be here. I appreciate the opportunity to participate in this study and to provide you with an update on the CFIA's work on proposed changes to part XII of the health of animals regulations.

[Translation]

As this committee is aware, the CFIA is a science-based regulatory agency dedicated to safeguarding plants, animals, and food. Our work promotes the health and well-being of Canada's people, environment and economy.

[English]

With respect to animal welfare, I would like to emphasize that in Canada this responsibility is shared among federal, provincial, and territorial governments, industry, and the public.

First and foremost, the responsibility for animal welfare automatically lies with whoever has care and custody of the animals. However, provincial and territorial governments have the primary regulatory responsibility for protecting the welfare of on-farm animals. Federally, the requirements for humane transportation of animals in Canada are specified in the health of animals regulations. The CFIA is responsible for establishing and enforcing these regulations, which were developed in 1977, and few amendments have been made since then.

The CFIA has recognized for some time that updates are needed to reflect today's science and industry practices and to better align with international standards. For the past 10 years, the CFIA has been consulting with stakeholders, such as transporters, producers, processors, animal welfare organizations, and the general public, on how best to amend the regulations.

In 2006, the CFIA began consulting on proposed amendments. Industry groups and the public were invited to provide comment on parts of the regulations that were being considered for modification. These consultations indicated that the majority of stakeholders largely agreed to the proposed changes.

In the fall of 2013, the CFIA further consulted on the proposed amendments to reconfirm stakeholders' expectations regarding the same elements presented in 2006. The CFIA also sought additional input on specific proposals to amend the regulations regarding such things as time intervals during which animals can be transported without access to food, water, and rest. In addition, the CFIA distributed two questionnaires in 2013 and 2014 that consulted businesses to collect data on the potential economic impacts of the proposed amendments. The first questionnaire targeted commercial transporters. The second one was very broad and reached over 1,000 stakeholders, including producers organizations, auction markets, assembly yards, processors, and those involved in commercial animal transportation.

In May 2015, the CFIA sent out a questionnaire to be completed by those who responded to the economic impact surveys to validate the data. These efforts led to the publication of the proposed amendments in part I of the *Canada Gazette* on December 3, 2016. The public comment period closed on February 16, 2017.

The changes being proposed to the health of animals regulations are intended to improve the well-being of animals during transportation, address public concerns, and better align Canada with major trading partners and international standards. Let me explain a bit further.

The proposed amendments would reduce the total time intervals during which animals can be transported without access to food, water, and rest. They would establish clear end results so that industry and transporters could better understand the requirements, and they would better reflect animals' needs and current industry practices and better align with standards set out by Canada's international trading partners and the World Organisation for Animal Health, also known as OIE.

•(1105)

The proposed amendments would provide clarification by adding clear definitions, such as those for compromised and unfit animals. As there are diverging views on animal transportation, we do not expect all stakeholders to support the proposed amendments. The CFIA's objective is for the regulations to strike a balance among the needs of animals during transport, the realities of transporting animals in Canada, and public concerns about animal welfare.

We have made real progress here, but there is more work to do. Since February 16, CFIA officials have been analyzing all the comments received to evaluate any potential changes to the draft amendments before the final regulations are published. I am pleased to report that the CFIA received input from close to 11,000 respondents, and the individual comments number in the tens of thousands. The comments come from many areas of expertise and interest, including academia, researchers, animal welfare organizations, industry groups, producers, transporters, government, veterinary associations, and individual Canadians.

I would like to note here that, while no mechanism exists to extend the comment period once it has concluded, the CFIA welcomes any recommendations that this committee may wish to provide on the issue before May 1. As part of implementation, the CFIA is proposing that the final regulations come into force 12 months after they are published in part II of the *Canada Gazette*. This will provide regulated parties with sufficient time to adjust to the new requirements.

Before I close, I want to point out that, while the CFIA plays an enforcement role, it also plays an educational one. The CFIA works closely with all interested parties to educate them about animal welfare during transportation. To this end, the CFIA has published an interpretive guidance document that accompanies the amended regulations to provide further direction and information to the regulated parties. The CFIA is committed to the humane treatment of animals during transport and takes the issue of animal welfare very seriously.

I would like to thank you again for this opportunity to provide an update on the CFIA's work with regard to part XII of the health of animals regulations. Thank you.

•(1110)

The Chair: Thank you so much, Mr. Komal.

Now we will proceed with the questions.

Mr. Anderson, you have six minutes.

Mr. David Anderson (Cypress Hills—Grasslands, CPC): Thank you, Mr. Chair.

Thank you for being with us today. We look forward to this study.

I'd just like to ask you a bit about the consultation process in the last year and a half. You mentioned that up to 2015 there was some discussion for almost eight or nine years, but it seems to me when talking to people in industry that they were surprised by the fact that this was dropped on them in November, that people didn't have a lot of knowledge that this was coming, or whatever. Then there was a fairly short comment period.

Actually I think the committee was caught by surprise as well, and of course we had our Christmas break and this was as soon as we could have hearings on this issue. Can you tell me what the process was in the last year or year and a half in terms of industry and the interest groups that might have been involved?

Dr. Jaspinder Komal: As I said, we've been consulting for the last 10 years, and there are various ways to consult with our stakeholders. Normally we would meet with our stakeholders whenever we have a chance to meet with them, and we inform them at my level and levels above me. We always have meetings with our industry partners from time to time, either in a formal or informal setting. But as I said in my opening remarks, we also sent questionnaires to our stakeholders from time to time. We have been meeting and collecting data from them. Of course, these questionnaires and surveys are voluntary, so we get them back and we try to collect information and analyze it. Also, when folks are here in Ottawa, we find a chance to meet with them and educate them.

We have consulted with them quite a bit, but since 2013-14, as I said, we distributed more than 11,000 surveys to 1,100 stakeholders to determine the economic implications of the proposed amendments, and we then went back to validate that survey in 2015 to look at what we got, what they said. Of course, as I said, certain parts of the industry will respond more than others.

Mr. David Anderson: I have a concern then. This isn't the first time that we're seeing decisions at committee that have been made suddenly without industry participation. Even in your answer you haven't talked about the last year, year and a half, other than some sort of voluntary participation in a survey or whatever. I hope you understand that this leaves industry on the outside looking in. It makes some of us wonder how these decisions are being made, how much co-operation and how much science is involved in them, and how much political decisions are playing a role in these kinds of things.

One of the major things these have done is suggest that we need some time intervals changed. How do you determine time intervals, and specifically, do you think that the international standards, particularly those out of Europe, are useful for a country that's as diverse as Canada?

Dr. Jaspinder Komal: Thank you again, Mr. Anderson.

I want to go back to your previous comment. We have consulted in the last year and a half, two years, but we have been talking to the industry for the last 10 years, so it's not that they weren't aware that these changes would be coming at some point.

Mr. David Anderson: They sit for seven or eight or nine years, and nothing has changed. Then there's a dead period, and then, all of a sudden, something's dropped on them. Do you understand how that might be an issue for industry, giving rise to a concern about whether they're being consulted on these issues?

• (1115)

Dr. Jaspinder Komal: I take your point, but I think we always said that these changes would be made whenever we have an opportunity to make them. We have been updating the industry on our progress from time to time. We have taken the value chain round table, for example, as a forum to talk to the industry on a one-to-one basis.

Mr. David Anderson: Can I just ask about the specific changes? You're saying that the industry should have known that what you proposed here was what they were going to have to deal with at some point. Is that what you're saying?

Dr. Jaspinder Komal: Yes. They were aware of the changes we were making with respect to the food, water, and rest intervals of the time prescription. We start with the science on this, as I said. Since 1977 more science has been available on the welfare of animals and how animals behave when they are transported. The transportation of animals is a very stressful environment for animals, and these animals are transported a number of times during their lives.

We start with science and then we look at what our international partners are doing. We also look at the international standards set by the World Organisation for Animal Health and then we also look at the geographical realities of Canada and the interests of different stakeholders on both sides of the ledger. That's how we came up with it. Before the consultation, we had proposed some times. We did consultations and we adjusted our times before *Canada Gazette*, part I, and now we have received upwards of 11,000 submissions from different stakeholders. We're doing an analysis, and we'll see if we need to further—

The Chair: Thank you, Mr. Komal.

Thank you, Mr. Anderson.

[Translation]

Mr. Breton, you have the floor for six minutes.

Mr. Pierre Breton (Shefford, Lib.): Thank you, Mr. Chair.

Mr. Komal, thank you for being here with us today.

I would like to pick up on the issue raised by my colleague, Mr. Anderson, regarding the changes to be made to time intervals. You touched on the European Union's standards. As you know, however, we draw on international standards.

What can you tell us about your comparison with Europe? One just has to think of time intervals, the animals' access to water or food during transit, or to ventilation systems. I think these are still the public's concerns regarding the treatment of animals.

Dr. Jaspinder Komal: Thank you for your question, sir.

As I said, we looked at all these factors, along with the standards in Canada, Europe, the United States, Australia, and New Zealand.

In the past, the Health of Animals Regulations were very prescriptive. Now the focus is more on results, but the regulations still set out the travel times.

Canadian standards differ from European ones because animals are transported over greater distances owing to our geography. In any case, we have reduced travel times. We have also examined industry needs and determined the maximum travel times that people transporting animals must comply with. If something unexpected arises before or during transit, the people looking after the animals should decide to reduce the travel time based on the animals' health.

So the regulations set out the travel times. Canada's standards in this regard are similar to those in the United States, Australia, and New Zealand. The standards in Europe are much stricter than ours. In Europe, however, the distances are much shorter than they are in Canada.

We evaluated all these factors and arrived at these standards for Canada.

• (1120)

Mr. Pierre Breton: Okay.

What about training for people in the industry? Do the regulations impose training requirements on people in the industry? There are many details. It would be useful for these people to get training, and for it to be provided by the government or accredited consultants. Do the regulations address that?

Dr. Jaspinder Komal: Thank you for your question.

A provision was in fact added to the regulations requiring everyone who looks after these animals to receive training, as stipulated in international standards.

From the time they leave the farm, the animals go through many hands: they are loaded onto trucks, transported, and then shown at markets for sale, and so forth. The regulations will henceforth require that all the handlers involved, including the truck drivers, be trained to know how each species of animal will react under the more stressful transit conditions. If something unexpected arises, the person will know what has to be done to make sure the animals are well treated, fed and watered.

In addition, as I said in my presentation, there will be a guide to help people in the industry interpret the rules. The CFIA will continue to train all the handlers to make sure the animals are well treated.

Mr. Pierre Breton: Thank you, Mr. Komal.

The Chair: Thank you, Mr. Breton.

Ms. Brosseau, you have six minutes.

[English]

Ms. Ruth Ellen Brosseau (Berthier—Maskinongé, NDP): Thank you, Chair.

Thank you, Mr. Komal, for your presentation and for your participation in this study.

You've talked about Europe having very strict standards. As we compare the U.S. with Canada, can you elaborate on what is done in the States and how that applies compared with Canada?

Dr. Jaspinder Komal: Thank you again for your question. The U.S. has standards for times. It has one standard, I think it is about 28 hours, but it also has provisions in its standard to move a little bit up and down so, for instance, if somebody says there are unforeseen circumstances that have come up, he or she can actually get permission to adjust the times.

We have prescribed standard times for different species based on the available science, based on the welfare of different species of these animals. Also we wanted to make sure that the industry has targets that it can actually comply with, so it is better from a compliance point of view, it's better efficiency from CFIA's inspection point of view, to provide those times for different species. In terms of making sure that we are on the same standard as the U.S., because there is a lot of trade of animals between the U.S. and Canada, I think that in the species and the sectors in which we trade with the U.S., we are pretty much in line with them.

Ms. Ruth Ellen Brosseau: Transporting animals is stressful, especially when they're young. It's the first time, they're being weaned, and they're taken away from their mothers. When they're transported.... I was speaking to farmers this morning and one of the concerns that was brought up was that sometimes maybe stopping and unloading them, giving them water when they haven't had water before—it takes a while for an animal, a young one, to be accustomed to drinking water—was more stressful than just getting the job done as quickly as possible. I would like to hear your comments on that.

Canada is a very big country. We have seasons. We have heat in the summer and extreme cold. I was wondering if we could get your comments on that one. When we hear that, maybe just getting it done in one shot and not stopping, can you talk about how those interval times will actually help improve animal health?

• (1125)

Dr. Jaspinder Komal: It's a very good question. Yes, as I said, the transportation of these animals is a very stressful event for them. Animals in Canada are transported many times in millions of numbers. For young animals, we have a prescribed time, which is very tight, very short, shorter than for adult animals. For cows, for example, we have prescribed the time of less than 12 hours, so this is in one shot. If they have to be stopped, they have to stop over for feed, water, and rest for eight hours at least to rest.

It's the same thing for other animals. For cattle, for example, it's 36 hours, because traditionally, historically, cattle are transported east to west, and we want them to be rested if the travel goes longer than 36 hours.

It's very akin to human beings travelling. If we travel a long distance, we are in the plane for a longer period of time, we tend to get dehydrated, even if we keep drinking or eating. It's a very similar condition for animals. If you just leave them to transfer for 70 hours, 72 hours, or 80 hours, I think the research has shown that there's a deterioration of their physiological system and pathological conditions start setting in, animals get sick, and then ultimately the

product that we derive from these animals is not good quality and not safe for humans.

As I said previously, we started with the science, then we adjusted based on the geographical environment in Canada. We still think that by reducing these times from the previous standards in 1977 it's going to be much better. Are we perfect? I think we are not, but it's good progress, and as the science evolves we will continue to make further progress.

Ms. Ruth Ellen Brosseau: Can you maybe talk to us about the transport of compromised animals now? In the *Canada Gazette* regulations amending the health of animals, it says "N/A" current hours for compromised animals, and now there are 12 hours proposed for a compromised animal. Can you maybe talk to us and elaborate a little more on that, please?

Dr. Jaspinder Komal: In the current regulations, the regulations that were published in 1977, there's no distinction. In the proposed regulations, we have tried to make it clear to the animal handlers or the industry what "compromised" means and what "unfit" means. We have tried to prescribe that in the regulations because it's very difficult to do an assessment of an animal if you don't have professionals.

The Chair: Thank you, Mr. Komal. I'll have to change.

[*Translation*]

Thank you, Ms. Brosseau.

[*English*]

We'll have to move to Ms. Lockhart and perhaps you can finish your thoughts.

I'm not suggesting you use your time, Ms. Lockhart, but you might have a chance later on.

Mrs. Alaina Lockhart (Fundy Royal, Lib.): I appreciate that, Mr. Chair, and I'd be happy to have you finish your thought.

Dr. Jaspinder Komal: Okay, thank you. I will try to finish it.

We have clearly defined the regulations for the unfit and for compromised animals. We have defined the conditions for making them travel if they become compromised or if they're compromised before they're put on a transportation vehicle. Whereas if the animal is unfit, then we are saying you cannot make that animal travel at all. That is the distinction we're making.

• (1130)

Mrs. Alaina Lockhart: As we work through this and the amount of time for transportation, could you touch on the context as we look at slaughterhouses across Canada? There seems to be more stress on these regulations, as a tremendous number of slaughterhouses have been closed over a period of time. I know that's a significant issue in my province of New Brunswick. Are we seeing those travel times increase dramatically because of that?

Dr. Jaspinder Komal: There's been a lot of adjustment ever since these regulations were first published in 1977. For example, we had upwards of 400 slaughterhouses across Canada, and I think currently the number of federally registered establishments may be less than 100. That is not to say that animals cannot go to provincial plants or municipal plants, but in order for food to be traded internationally and interprovincially, those animals go to the federally registered establishments.

These animals travel longer distances than before, and because of that it is very important to make sure that these animals are taken care of. That's why we prescribed the definite times for travel in addition to—

The Chair: Sorry, to interrupt, Mr. Komal. We just had notice that there will be a vote in half an hour. We can go a while longer if you wish, but I would need full consensus to continue.

Are we good with 15? Can we make it there?

A voice: Yes.

The Chair: Okay, we're good with 15. Go ahead. Sorry about that.

Dr. Jaspinder Komal: For this part of the regulations, we are prescribing the time, but we're saying that it's also the outcome. If during the transport time animals become distressed or sick, or if something else happens, the transporter has to assess and maybe reduce the intervals for travelling.

Mrs. Alaina Lockhart: Sorry, I didn't hear that last part. You said, "And maybe...."

Dr. Jaspinder Komal: And maybe reduce that interval of the time for travelling these animals. Instead of travelling them for 36 hours, if the trucker thinks that animals are getting sick, that the temperature's not very good, or that it's too cold or too hot, they need to make an assessment of how far they can go. That's why the training is very important for these people who are handling the animals.

Mrs. Alaina Lockhart: During your consultations, have you heard from producers in Atlantic Canada about increased stresses or challenges in transportation? What are you hearing?

Dr. Jaspinder Komal: Yes, we have heard from all stakeholders including producers. We were at a meeting a couple of weeks ago where we had Atlantic producers. They are concerned about the animals travelling farther and farther, and they are concerned about the distance. As I said previously, however, if we keep these animals travelling for long distances, there's more stress than if we make them stop and take some rest for seven or eight hours before they continue.

Mrs. Alaina Lockhart: I guess I'm just looking at it from the perspective of the producers. They don't have as many local options for slaughterhouses, and at the same time they're feeling the pinch on the other side. It is a balancing act, as you've already alluded to, but there are some realities on the ground that we need to be sensitive to as well. I just want to make sure that in your evaluation those are being considered.

Clearly, I'm more familiar with eastern Canada. I know it's a much smaller scale than the rest of Canada, but I think there are some significant challenges there as well.

Dr. Jaspinder Komal: Yes. We also have the data within CFIA for the travel of these animals, because our inspectors collect that data. We did the analysis of the data, and we think that close to 98% of these shipments will already be compliant with these transport times.

Mrs. Alaina Lockhart: That's a very good piece of data to have. My next question was going to be about the compliance, so thank you for that.

Thank you, Mr. Chair.

• (1135)

The Chair: Thank you.

Mr. Longfield, you have six minutes.

Mr. Lloyd Longfield (Guelph, Lib.): Thanks, Mr. Chair.

Mr. Komal, thank you for being here.

Thinking of innovation, things have changed a lot since 1977. I remember 1977. Disco was in, and cows all had Afros.

Voices: Oh, oh!

Mr. Lloyd Longfield: I'm wondering about the transportation systems themselves and whether those are keeping up with the changing situations, as Ms. Lockhart put out there in terms of the reduced number of slaughterhouses. Is the transportation technology changing in any way to try to keep up with the changes at slaughterhouses?

Dr. Jaspinder Komal: Yes. A lot has changed since 1977. In 1977 animals mostly travelled by rail. Currently lots of animals travel by trucks, so that has changed.

Industry has also adjusted quite a bit. Industry has done a lot of good work. That includes producers, transporters, and everybody else. Industry has developed codes of practice for animals on the farm and also for transportation. In fact, industry is developing a transportation code. They're just waiting for these regulations to be passed so that they can adjust their code accordingly.

There is a lot of innovation in the transport system, although not as much as we would like to see. There is a lot more in Europe. In Europe they have trucks equipped with water and feeders and a lot of other things, but here in Canada I think there's a lot of innovation in terms of protecting animals from frostbite and what they need to do if the centre of the truck gets too warm. The training of these handlers will further enhance that innovation, I think.

Mr. Lloyd Longfield: With regard to the all-government approach that we looked at in an earlier study, having innovation included in maybe upgrades that might be needed in terms of the new regulations coming in, I'm also thinking of the connections to the Canada Border Services Agency and what happens with delays at the border. Could you speak to that in terms of how CBSA works with CFIA in monitoring delays at the border, if those occur?

Dr. Jaspinder Komal: Yes. We are very well connected. CBSA delivers services on behalf of CFIA. We have an understanding with CBSA. They are very well aware of the truckloads of animals that are moving. Millions and millions of animals move back and forth, especially in western Canada. There is a mechanism to pre-inform the Canada Border Services Agency that these loads are coming and they shouldn't be waiting long in the queue at the border. That understanding is there.

Mr. Lloyd Longfield: In the House two weeks ago, we were talking about pre-clearance and changing some of the regulations about clearing shipments of goods and people to the United States. Does that impact on this discussion?

Dr. Jaspinder Komal: Yes, definitely. We are also working on our side to do innovation, such as the electronic exchange of information with our colleagues at the USDA. We have implemented a pilot in western Canada at four different crossings where we can just exchange electronic signatures. We are working very closely with the USDA APHIS, the animal and plant health quarantine service in the U.S., to ensure that these things are happening. Yes. This will be very helpful to us for pre-clearance.

Mr. Lloyd Longfield: One of the challenges we all face is communications. People go on the assumption that nothing is being done and wonder how the communications rolls out to industry and who's picking up the cost for some of the changes that have to be done to keep up with technology. What's being done through your consultation process? I think Mr. Anderson asked, "Is this another surprise?" It sounds like the industry has been very well informed along the way. Is that your evaluation or do you see communications as a challenge?

Dr. Jaspinder Komal: I think we have done a great amount of consultation and communication. Of course, we can do more. One of the things we are doing is—and I should have actually included it in my response before—we will delay the implementation date for one year after we have the final regulation because that will allow the industry to adjust. That may also allow the industry to work with our colleagues on the department side of Agriculture and Agri-Food Canada, if they need any help to make any adjustments. As an example, if they need more rest stations along the way, there will be an adjustment and we are allowing the time to make those adjustments.

•(1140)

Mr. Lloyd Longfield: Thank you very much. In the 20 seconds left, I could share my time with—

The Chair: Thank you.

I think we will end it. If it's a normal vote and it takes a normal amount of time, maybe we could at least come back to hear some of the witnesses.

Do you have something to add, Mr. Anderson?

Mr. David Anderson: I think we should go, but I would like to reserve the right to ask Mr. Komal to return again to the committee and finish his testimony.

The Chair: That would be okay, if we have time.

We will suspend.

•(1140)

_____ (Pause) _____

•(1225)

The Chair: We shall resume our meeting on the transport of animals.

On this panel, we have the Association québécoise des transporteurs d'animaux vivants, with Alain Manningham. From the Canadian Federation of Agriculture, we have Mr. Bonnett. Once again, welcome to our meeting.

We also have, from the Canadian Federation of Humane Societies, Toolika Rastogi, policy and research manager.

I apologize for the shortened time we have, but we'll give you your full time to present, and then we'll see. We might have a short round of questions.

We'll start with the Association québécoise des transporteurs d'animaux vivants, Mr. Manningham. Go ahead.

[*Translation*]

Mr. Alain Manningham (President, Association québécoise des transporteurs d'animaux vivants): Thank you, Mr. Chair.

Hello, everyone. Thank you for this opportunity to appear before you.

First of all, I would like to thank my MP, Jacques Gourde, for inviting me to appear before the committee today. We are very grateful for the opportunity to convey our concerns to the government about the current regime for the transportation of live animals.

We are here to talk about a real and glaring problem that is getting worse and worse. I am referring to the system of administrative monetary penalties or AMPs, specifically as regards the transportation of unfit animals.

Before delving into the issue, let there be no mistake that animal welfare is very important to our association and to our members. Moreover, we were the first to fight for compliance with the highest ethical standards relating to the transportation of animals.

Animals are our livelihood. This reality sometimes escapes the people with whom we discuss this. It is thanks to animals that we can put food on the table.

You must also understand that we have every monetary reason to protect animals. An animal who dies in transit is a straight loss for us. If too many animals die in transit, it becomes a problem for our clients.

In short, we have every reason to protect animals from ill treatment, and that is what we do. We do not need legislation to force us to protect animals. We scrupulously comply with the law .

What the current system provides, however, is something different. Allow me to read an excerpt from a unanimous Federal Court of Appeal decision from 2009, in the Doyon case:

In short, the Administrative Monetary Penalty System has imported the most punitive elements of penal law while taking care to exclude useful defences and reduce the prosecutor's burden of proof. Absolute liability, arising from an *actus reus* which the prosecutor does not have to prove beyond a reasonable doubt, leaves the person who commits a violation very few means of exculpating him- or herself.

That is strong language. These are the most punitive elements of criminal law, without the defences, but with a reduced burden of proof. The worst part of criminal law is kept, and the burden of proof on the prosecutor, the CFIA, is reduced to almost nothing, and all the elements of defence of the alleged offender are removed. How could our MPs have passed such a law? We have to wonder.

That said, we will not be calling for a criminal procedure today or for the usual burden of proof, or talk about a 50% discount, all points that could be problematic. We are willing to deal with all the imperfections of this law since Parliament enacted it. We do, however, demand the right to a defence.

We simply want to talk about the innocent party's right to plead their innocence, a right that is the foundation of our legal system.

Subsection 18(1) of the Health of Animals Act excludes due diligence. Yet this defence is present in nearly all Canadian legislation. It means pleading that every reasonable measure was taken to avoid the violation, or that one sincerely and reasonably believed something that was proven false.

To illustrate further, even if the transport company hired a veterinarian to examine the shipment, it could still receive a notice of violation. So if an animal had a completely undetectable condition, the transporter could still be fined.

In short, innocent parties are being found guilty. We want to stress this point. If the defence of due diligence is allowed, negligent transporters will still be found guilty. The only difference between allowing and not allowing the due diligence defence is finding people guilty who have done nothing wrong. Why should innocent parties be found guilty?

• (1230)

Let me give you an example of something that happens on a regular basis when animals are transported. When animals are being loaded, often there is not much time to examine them. They are loaded in all kinds of conditions. In the winter, for example, it is very cold. There are some animals that should not be loaded, but that are still in the shipment, either because certain producers did not understand the regulations correctly or because they decided to hide them in the group. When we get to the plant, the people there examine the animals and find that some should not have been transported.

In many cases, we transport swine or cattle. For swine, the transportation cost is \$3 per head, while the animal could be worth \$150 or \$200. If an animal is hidden in a group without our knowing

it and we have not noticed its condition, we are fined \$7,000. We transport a lot of head of cattle every year. We are considered repeat offenders if there are too many such cases. The fine imposed on repeat offenders increases each time. It can rise to \$12,000 and then \$20,000. I don't know if you are aware, but that is how it works.

In closing, I would like to share a few statistics.

Of 10 countries with AMPs, including England, Spain, Germany, and Portugal, Canada is the only one that does not allow this defence. This defence is not allowed in just one third of the nine AMP systems in the country.

Let me quote another statistic. In criminal law, for the same charges, fewer than half result in payment; for AMPs, the rate is over 98%. Are there more offenders in criminal law? Certainly not. These are the same offences. The difference is that, in the case of AMPs, people are not given the opportunity to defend themselves. This huge difference means that innocent parties are often found guilty.

• (1235)

The Chair: I will have to stop you there, Mr. Manningham. Your presentation time is up.

Mr. Alain Manningham: That's fine, I was finished.

The Chair: Thank you.

[English]

Now, Mr. Bonnett, you have seven minutes.

Mr. Ron Bonnett (President, Canadian Federation of Agriculture): Thank you for giving me the opportunity to present to the committee.

Most of you know who CFA is and who we represent, so I don't think there's a lot of use in going through that explanation, but I would say that CFA represents all agricultural producers, because of the membership we have.

I'll be speaking to some high-level concerns and recommendations that Canadian producers have, and I encourage you to continue to reach out to commodity-specific organizations on how these proposed regulations would affect individual species. They are better informed to provide specific examples from within their industry and to address some of the species-specific concerns and requirements set out within the proposed regulations.

Overall, the transport of farm animals is an area in which Canadian producers have a very strong interest in maintaining high care standards. The thorough and hard work accomplished through the National Farm Animal Care Council, of which CFA is a member, continues to play a strong role in providing sound scientific guidance for the best practices of assuring animal care outcomes for producers and during transport.

The National Farm Animal Care Council brings together producers, the value chain, animal welfare scientists, and NGOs with an interest in farm animal care to collaboratively develop codes of practice for the industry to follow. These multi-stakeholder approaches provide the best process for developing the needed authoritative guidance to a continuous improvement approach to animal care.

There's no doubt that maintaining high standards of care during transportation is a matter of public trust and something that the industry has come under scrutiny for in the past. From the producer's perspective, poor animal care outcomes during transport open up the industry to increased public criticism, the likelihood of increased regulation, and also a lower price received due to shrinkage or a compromised animal. It is clearly in the best interest of industry to look to continuously improve our standards of animal care, and a component of this is the regulatory backbone to the system. We've also recognized that bringing Canadian regulation up to international standards set by OIE is an important component.

Overall, we'd like to thank the department for moving towards regulatory language that is outcome-based rather than prescriptive. This enables regulation to better keep up with rapid technological and market changes. That being said, there are a number of concerns that we'd like to raise regarding the proposed regulations.

As Canada is geographically very large, some components of agricultural production rely on shipping animals over large distances for domestic production, especially for breeding and processing. Over the past number of decades, we've seen declining numbers of processing facilities, so there's been no choice for producers but to ship animals further.

Similarly, as one of the few countries in the world that exports food, Canadian producers ship live animals to many countries, and therefore, stand to be impacted by the lowering of intervals that animals can spend in transit without access to feed, water, and rest. This is compounded by the additional requirement to attain reasonable expectations that sufficient care will be provided throughout the length of a journey, once the animal has left Canada.

While every effort is made to ensure animal care standards are achieved and exceeded once the shipment leaves Canada, this is easier with known businesses and countries than with new ones. Therefore, there is some concern that this requirement could act as a disincentive to grow new markets or expand current ones by working with new business partners in new countries. We support the requirement in principle, but would like to see clear guidance for how the industry would comply with this requirement and address potential hindrances in market development.

I'd like to encourage the committee to closely assess the potential impact of lowering the maximum intervals based upon the testimony of national commodity organizations. With immense diversity within industry from species to species, the intervals should remain at different levels based on the best science. We have therefore asked CFIA to revisit the proposed intervals and regulatory impact analysis statement to more carefully consider the impact on the full value chain for all types of farm animal transport.

Overall, we'd recommend a four-hour extension for all categories, to cover unforeseen circumstances that rarely, but inevitably, arise. This allows for those transporting animals to adequately respond in rare situations that are simply not foreseen in a contingency plan. We would also like to ensure that the requirement of a contingency plan does not require a written plan. In many cases, for experienced transporters, routes are well known and issues that could cause significant delays can be mitigated through experience.

● (1240)

Increased focus on offering training to those actually transporting the animals would improve outcomes as people begin to better understand the animals and the regulatory requirements.

Producers and those who transport animals all strive to reduce the potential stress and suffering for animals during transport. Differences in breeds and how animals have been raised, coupled with unobservable conditions, will mean that some animals are more used than others to transportation, confinement, and being with other animals, resulting in different stress levels depending on many factors. The regulation should be clearer to determine the extent of undue, unwarranted, disproportionate, and unjustified suffering. By doing so, the regulations would be able to support improved animal care outcomes and current legal interpretations with consistency and clarity.

Additionally, the term "visibly observable" should be included as it relates to those responsible for loading, unloading, and transport of compromised and unfit animals. There are many potential conditions that could lead to an animal being determined as compromised or unfit, but these are not always visibly observable to those who hold the responsibility for transport. No one responsible for transport wants to unknowingly transport compromised or unfit animals. Without this term, confusion around whether people would be held liable for a situation in which they did not reasonably have access to information or visible indication that an animal was compromised or unfit could cause problems.

We also recommend that CFIA pursue a flexible implementation option to allow smaller businesses the time needed to ensure that operators receive appropriate training. It is expected that with the coming into force of these regulations there would be a significant demand for training, and allowing more time to phase that in would be beneficial to both employers and employees.

The agriculture industry requires strong yet workable regulations to guide the humane transport of farm animals in order to maintain and build public trust while providing guidance to the industry. Once the regulations have been updated, we remain committed to working with the National Farm Animal Care Council to develop and continuously update codes of practice and share information across commodities.

The Chair: Mr. Bonnett, I'm going to have to—

Mr. Ron Bonnett: Just a quick addition....

Last night, the issue was raised by people transporting fowl that the definition of transport time has been changed. The transport time from leaving the farm to getting to the processing facility is now extended to include the time off feed and water. It was explained that in a chicken barn, for instance, it may take four hours to load the truck, so all of a sudden you've lowered the time. I think you have to consult with some of the sector-specific—

The Chair: Maybe some of the questions will deal with that, Mr. Bonnett. Thank you so much.

Ms. Rastogi, go ahead for seven minutes, please.

Ms. Toolika Rastogi (Policy and Research Manager, Canadian Federation of Humane Societies): Thank you very much for the opportunity to present to the committee.

In my oral statement today I'm going to address three different areas. First, I'll let you know a little about the sector we represent. Secondly, I'll speak to proposed amendments to the health of animals regulations, and thirdly, the importance of animal welfare in public trust.

The Canadian Federation of Humane Societies, or CFHS, is the only national organization representing humane societies and SPCAs in Canada. We drive positive, progressive change nationally to end animal cruelty, improve animal protection, and promote the humane treatment of all animals through the enactment of effective legislation, among other means.

CFHS was formed in 1957 out of concern for the welfare of farm animals and was influential in the introduction of the federal Humane Slaughter of Food Animals Act in 1959. As a founding member of the National Farm Animal Care Council, CFHS advocates for continual improvement to the standards of farm animal care in Canada's agriculture industry codes of practice.

Humane societies and SPCAs, or what we refer to as the humane sector, make up one of the oldest social movements in Canada. Canada's first animal cruelty law was established in 1857, and Canada's first SPCA was established in 1869.

The humane sector is a key contribution to Canada's community social safety net. The sector is made up of 115 humane societies and SPCAs located in every province and territory, in urban and rural communities, and acting at local and provincial levels. Forty per cent of humane societies and SPCAs have enforcement authorities for provincial and federal legislation pertaining to animal cruelty and abuse. The sector employs almost 2,000 full-time employees.

I would now like to turn to the proposed amendments to the health of animals regulations.

More than 700 million farm animals are raised in Canada each year and the majority of them are transported for slaughter. Transportation creates a high risk of both animal suffering and disease. Overall, we feel that raising and slaughtering animals in close proximity better meets sustainable development objectives of reducing environmental impact, improving health outcomes and social conditions, more efficient and equitable economic conditions, and improved animal welfare than a system of agriculture that relies upon long-distance transportation.

As proposed, the revised transportation regulations would compromise animal welfare in at least four areas.

Firstly, the length of time that animals are allowed to be transported and must go without food, water, and rest is still far too long in the proposed regulations. The longer animals travel, the more likely it is that there will be negative animal welfare outcomes, and there are scientific studies to that effect. For example, Gonzalez and colleagues published on the transport conditions for cattle.

Overall journey lengths from initial preparation to final destination, in total, the whole process, must be shortened. For example, rather than the proposed 36 hours for cattle and 28 hours for horses and pigs, we would recommend eight hours as per the European Food Safety Authority's independent scientific panel on animal health and welfare.

Secondly, transportation presents significant animal welfare challenges for healthy animals. However, the proposed regulations allow many so-called "compromised" animals that are already suffering from poor animal welfare due to other injuries and conditions to be transported for significant durations, and this is not acceptable. These animals should actually be listed in the regulations as unfit for transport.

Thirdly, the draft regulations do not provide sufficient safeguards to ensure that animals are not subjected to extreme environmental conditions while in transport. These conditions further challenge their physiology on top of the stress they're experiencing due to transport itself. Transportation should not be permitted in extreme environmental conditions. Vehicles should be designed with equipment to provide insulation and appropriate bedding; and ventilation systems and monitoring of conveyance conditions should be made mandatory to prevent overheating and frostbite. Since 2009, the European regulations have required that all road vehicles used for long-distance journeys be fitted with such systems.

The fourth area is loading densities. Loading density itself is an essential variable that must be controlled during transportation. Therefore, clear rules, including maximum loading densities, must be provided in the regulations and checked during inspections. We recommend space allowances as laid out by the European Food Safety Authority's independent scientific panel.

• (1245)

These are four key areas I wanted to raise to let you know of our concerns regarding the current proposed regulations. For the final minute or two, I'd like to touch on the importance of animal welfare in rebuilding public trust.

Public trust in the agriculture sector is vital to its success and to the livelihoods of many producers and communities. In 2016, Canada's federal, provincial, and territorial ministers of agriculture issued the Calgary Statement, their consensus view on the priorities to develop for the next ag policy framework. One of the six priority areas they identified was public trust. In this context, ministers specifically acknowledged changing consumer preferences in food and that consumers expect transparency from industry and assurance that food is produced in safe, sustainable, and responsible ways. Given the link between animal welfare and food safety, responsible, sustainable, and safe production must include humane production.

Another point they made that is particularly relevant to today's session is that ministers reaffirmed their support for continued review and modernization of science-based regulations for food safety, animal health and welfare, and plant health. This commitment surely includes the adoption of revisions to the long-outdated regulations for transport to bring them in line with the current science and other international jurisdictions.

Public confidence relies on strong, effective regulations and their enforcement. Given how long the amended regulations may be in force before being updated in the future—and it's worth noting that the current regulations have been in place for over 40 years—the most current animal welfare knowledge must be considered and the most progressive provisions included to ensure that the regulations remain relevant for years to come.

Animal welfare concerns among the public are at an all-time high and are evolving rapidly. Therefore, it is essential that governments support producers in transitioning to systems that—

- (1250)

The Chair: I'll ask you to conclude, if you can.

Ms. Toolika Rastogi: Okay.

They must be supported to be able to provide for this demand for humane products.

Canadians expect to make decisions on food choices based on their own household budgets but assume that all the products on their grocery shelves have been produced humanely and that the government is overseeing that, so we would—

The Chair: Thank you, Ms. Rastogi.

Ms. Toolika Rastogi: Thank you very much.

The Chair: We have time for short questions from each side.

[*Translation*]

Mr. Gourde, you have six minutes.

Mr. Jacques Gourde (Lévis—Lotbinière, CPC): Thank you, Mr. Chair.

I would like to thank the witnesses for being here today.

My question is for Mr. Manningham.

When an animal leaves the farm and is loaded onto one of your trucks, does it become entirely your responsibility?

Mr. Alain Manningham: The animals are entirely our responsibility. We are willing to assume that.

Mr. Jacques Gourde: When you get to the slaughterhouse and start unloading the animals, if there is a problem with an animal, are you fined by the CFIA that same day or reasonably soon thereafter, or is it not until weeks or months later?

Mr. Alain Manningham: We typically receive a letter saying that a file has been opened for that animal and describing what happened. It is then transferred to the CFIA.

Mr. Jacques Gourde: How long after the events do you receive the letter?

Mr. Alain Manningham: It takes from 15 to 18 months before we receive a document saying that we are guilty, that we committed a violation.

Mr. Jacques Gourde: So you are not called the day the shipment is unloaded, when the CFIA took pictures of the animal and produced a report. The officials did not ask you to go back to see them and check with them.

Mr. Alain Manningham: No, no.

Mr. Jacques Gourde: Have you been able to request a second opinion from a veterinarian that you have paid for yourself in order to defend yourself?

Mr. Alain Manningham: We cannot do that at all. Once the animal has been declared unfit, it is slaughtered and we cannot revisit the matter, it is closed. On the other hand, we do not receive the documents until later on.

Mr. Jacques Gourde: Are you the only one who is fined? If it is discovered that the problem might come from the farm, is the fine divided up or are you entirely responsible?

Mr. Alain Manningham: Both parties are fined, the farmer and the transporter. I have no power over that. If it is decided that the animal should not have been transported, the fine is automatic.

Mr. Jacques Gourde: You talked about a \$7,000 fine for a first violation, for an animal that is worth about \$200. That is 35 times the animal's value. For a second violation, it is 60 times its value, and the third time, 100 times its value. Are these fines excessive?

Mr. Alain Manningham: Yes, they are very excessive.

Mr. Jacques Gourde: Do you know of any companies in your sector that have stopped transporting animals after receiving such fines because they could no longer take the financial and competitive risks? That also places tremendous pressure on the company and on the transporters, those who load the animals onto the trucks, because it is their responsibility to determine whether or not the animals should be loaded onto the trucks.

Mr. Alain Manningham: There are companies that have had to close their doors. The directors were of a certain age, were about to throw in the towel, and that gave them a good reason to do so. This situation can also cause additional problems for new companies wanting to start up in this field. It is becoming increasingly problematic.

Mr. Jacques Gourde: Do you have trouble hiring people to drive the trucks?

They are responsible for loading the animals and delivering them to the slaughterhouse. They also have to decide, together with the farmers, whether to load the animals or not. There is always some uncertainty.

Is that becoming problematic?

Mr. Alain Manningham: In terms of hiring people, it is very problematic. The employment rate is very high. The employees are responsible for doing their job well. We give them the same responsibilities as the company has. As a company, I am responsible for my employees. Some of them can put the company at risk if they do not do their job well. Since there is no defence, a company cannot defend itself when it is determined whether or not it is at fault and whether or not it has to pay a fine. An employee who is unhappy because his employer did not give him a raise, for instance, can cause problems.

• (1255)

Mr. Jacques Gourde: As to the training of these employees, does it take a long time to get them up to a level to be able to avoid problems?

Mr. Alain Manningham: We sink a lot of money into training. The slaughterhouses that buy the animals require that our staff be trained. That is the case in the area where I make deliveries, in any case. A great deal of time is invested in training. We have been required to train our staff for a few years now.

Mr. Jacques Gourde: If there is a problem at a slaughterhouse, would it be fair and reasonable for the CFIA to call the transporter so you can get a second opinion?

Mr. Alain Manningham: That would be fair.

Mr. Jacques Gourde: Thank you.

[English]

The Chair: Now I think you will split your time, Monsieur Drouin.

[Translation]

Mr. Francis Drouin (Glengarry—Prescott—Russell, Lib.): Yes, I will share my speaking time with Mr. Peschisolido.

[English]

I'll have just one statement and a question following this. Mr. Bonnett, you actually touched on it with regard to chickens being transported.

I know that in Europe, according to chapter V of the European Council's regulation on the protection of animals during transport and related operations, it states that the maximum time that chickens cannot have access to feed and water is 12 hours, but that doesn't include loading and unloading time. The reason they did this is that the most stressful time for an animal is when you load them and unload them. They didn't want to put the onus on the transporter to meet that deadline. On average, it takes three to four hours to load and unload chickens, and we keep hearing that Europe is the perfect example we should follow. My question is open to all three of you just to comment on.

Also, we know that they've withdrawn their feed and water eight to 12 hours prior to transport, so now you're above 30 hours in Europe. In Canada, we want to go below 30 hours and we don't have

the same infrastructure in place. I want to encourage you to comment on this, because it is often cited that Europe is the example we need to follow. Europe is similar to Canada after all. They just don't count like we do.

Ms. Rastogi, Mr. Bonnett, and Monsieur Manningham, can you comment?

Mr. Ron Bonnett: Go for it.

Ms. Toolika Rastogi: Thank you.

I would remind the committee that the current regulations stipulate that broiler chickens and laying hens cannot be without food, water, and rest for more than 36 hours. The interval you are speaking about in Europe is 12 hours. My understanding is that the journey times are typically shorter and that if in the conveyances there are provisions for, for example, water to be provided on the truck, these provisions can be quite helpful in allowing for longer transportation. The journey times absolutely must include the entire process, because the science tells us that animal welfare is compromised if the total length of time without food, and water in particular, is greater.

Mr. Ron Bonnett: I touched on it at the end of my presentation. Last night, there was an event with chicken farmers there, and they said that was a concern, including the time off feed and water. Maybe not so much the time off water, but off feed. That's why I said in the presentation that you have to be species-specific when you're talking about transport times. I'd encourage the committee to engage on the different species, because there can be unique situations where there may have to be some allowances made to ensure that the best thing is done.

One of the things I'd like to comment on, as well, is on the presentation from the humane society, which was recommending eight hours as a maximum time. I'm actually a livestock producer, a cattle guy—don't hold that against me—but if I think of eight hours, if you're within a couple of hours of your destination, loading and unloading those cattle puts a lot of stress on those animals.

I think we have to take a look at the overall animal care and animal welfare outcome rather than sometimes getting tied in so tight. If you get this target of eight hours and you know that an hour and a half down the road you can unload them at their final destination, why would you spend all that time running those cattle off a truck and getting them into a pen? Even though they have a rest period, they're not going to be too happy about getting back on that truck after that's done.

I think it's that outcome-based approach to the regulatory system, looking at what is best for the animal.

● (1300)

[Translation]

Mr. Alain Manningham: I would say, as Mr. Bonnett did, that the animals are under the greatest stress when they are unloaded. Ranchers and farmers today are very aware of the concept of biosafety. We have not talked about this, but biosafety is a concern when we are loading the animals, especially livestock, more so than for animals destined for the slaughterhouse. There is a high risk of illness being transmitted when animals are unloaded into enclosures. If those illnesses reach the farms, there are financial losses. As Mr. Bonnett said, it should be judged on the basis of the distances to be covered. I think the concept of biosafety should be applied, given the high demand among our clients.

As to the small animals that are transported, such as 6-kilo piglets, it is best to load and unload them just once. Their handling should be kept to a minimum, because the small animals do not have a lot of water. It is better to transport them in a single trip than in several stages. It is better for the animals.

Mr. Francis Drouin: Thank you.

[English]

The Chair: That's about all the time we have. Sorry about that.

[Translation]

Ms. Brosseau, you have six minutes.

Ms. Ruth Ellen Brosseau: Thank you very much, Mr. Chair.

Thanks to the witnesses for their presentations about the transportation of animals and their proposed changes.

Mr. Manningham, can you tell us about the training for truck drivers? I suppose there is some training since they have to get the animals into a truck and transport them for a period of time. They have the big responsibility of caring for those animals. Can you tell us about the expertise of those truck drivers and workers?

Mr. Alain Manningham: We currently have two choices in terms of transportation training. There is the American training, TQA or Transport Quality Assurance, which is very good. In Canada, there is also the Canadian Livestock Transport certification program. These two programs focus on animal well-being. They cover various aspects, such as procedures in the event of an accident, as well as legislation. Transporting animals is all well and good, but you have to know the laws in order to comply with them. Increasingly, meat processing plants are requiring that we take that training, since there is a demand from their clients, to whom animal welfare is very important. So the plants require the transporters to be trained.

Ms. Ruth Ellen Brosseau: Is it mandatory currently?

Mr. Alain Manningham: It is not mandatory for all plants, but it would be under the new regulations proposed by the CFIA.

Ms. Ruth Ellen Brosseau: Suppose we wanted to modify the trucks to have heating, more ventilation and air circulation, or equipment to water the animals. Do you have any idea how much those changes would cost? I know there are adapted trucks in Europe. In Canada, additional equipment is installed in trucks that transport animals over long distances to animal shows. Approximately how much would it cost to make those changes for livestock that is transported?

● (1305)

Mr. Alain Manningham: I could not give you an exact figure.

I will say though that Europe does not have the same climate as we do. With regard to Europe, people are often talking about England and France, which do not have our nordic climate.

There are certainly swine being transported to Mexico, for example, and some transporters have the necessary equipment to water the animals. That equipment is turned off in the winter, though, or else it would freeze. I would say those systems are quite expensive.

[English]

Ms. Ruth Ellen Brosseau: Madam Rastogi, can you talk to us about the consultation period? We know that the law was brought into place in 1977. Now, so many years later, there's been a consultation period of 10 years. Can you talk to us about your dealings with CFIA and the consultation?

Ms. Toolika Rastogi: Yes. Thank you very much.

The consultation process has been in place for a long period of time. There have been several different iterations of the agency presenting or going out to stakeholders as a whole on different proposals. There have been opportunities where we have provided our views from a science-based perspective on what animal welfare and animal health science show is important for the animals to have during that transportation period. We've reiterated them time and again, and typically, we find that those perspectives don't seem to be held as strongly in subsequent consultation processes as the industry viewpoint, which has been a little bit disappointing.

In particular, the last set of revisions that came out regarding the food, water, and interval times were a little bit more acceptable than the proposed regulations that came out in the *Canada Gazette*, but we were still quite disappointed with that.

Ms. Ruth Ellen Brosseau: I've been speaking with farmers this morning and the gentleman brought up the fact that we all know it's stressful for the animals to transport, but sometimes loading and unloading the animals and trying to get them to eat or to drink water, especially when they're younger, can be more stressful than just trying to keep them on the trucks and get them there as fast and as reasonably as possible. Do you think maybe if we made modifications to the trucks, like adding water or certain things, that would be a better option than stopping and having to unload?

Also, Alain brought up biosecurity. That is a huge issue too, but maybe that would be an option or compromise.

Ms. Toolika Rastogi: I think those are really important points, but it comes down to the length of transport that we're starting from. If we're starting with shorter transportation times, there's less of a crisis situation that would need to be addressed by providing that water and feed. Similarly, there would be a reduced need for handling of the animals. Again, it's these extremely long journeys that put food security at risk, through handling or disease transmission, or risks to the animals themselves during unloading and loading. I fully agree that loading and unloading are the most stressful aspects, so outcome-based are good measures to use, but within the context of a reasonable length of transportation.

Having provisions on trucks is an excellent approach to use and we would recommend that, even if the industry isn't necessarily able to do that immediately upon the regulations passing. If we're so fortunate as to have them pass in the short term, then I think that, as they are coming into force, a delay could be implemented for certain

provisions to allow the industry time to put in place the technological requirements needed to provide food and water for these animals.

The Chair: Thank you, Ms. Rastogi.

Unfortunately, that's the time we have and I do want to apologize again to the committee for this shortened version, but I guess that's the reality.

[*Translation*]

Thank you, Mr. Manningham.

[*English*]

Mr. Bonnett, thank you again. Ms. Rastogi, thank you for coming here today.

The meeting is adjourned.

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