



Chicken Farmers of Canada

Standing Committee on Health



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Chicken Farmers of Canada Submission to the House Standing Committee on Health Bill C-293, *An Act respecting pandemic prevention and preparedness*

The job of Canada's 2,800 chicken farmers is first and foremost to guarantee fresh, safe chicken raised with care for Canadians. Every single day, Canadian chicken farmers monitor their flocks for bird comfort and signs of disease, while following strict biosecurity standards to keep pathogens out of the barn.

The *Raised by a Canadian Farmer* On-Farm Food Safety Program is a mandatory, third-party audited program of which 100% of Canadian chicken farmers across every province are certified. This means that farmers follow program protocols for best practices in biosecurity and disease prevention on the farm. The Program has received federal, provincial, and territorial government recognition, including full recognition by the Canadian Food Inspection Agency.

Chicken Farmers of Canada (CFC) supports the notion of ensuring that the government and the Canadian public is prepared for a pandemic as outlined in Bill C-293, *An Act respecting pandemic prevention and preparedness*. Many of the elements and reporting initiatives outlined in Bill C-293 are seen to provide visibility on the level of preparedness and insight into initiatives that the government is undertaking in this area.

While C-293 seeks pandemic prevention and preparedness, the Bill includes content which goes beyond being prepared for a pandemic, and includes a negative, biased angle towards animal husbandry. CFC's concerns with C-293 relate to the type of language used to describe animal agriculture, the focus on agriculture in the context of antimicrobial resistance instead of using a One-Health lens, and the jurisdictional overlap of provincial governments on agriculture production.



While the majority of the Bill uses overarching language to describe the work of the Advisory Committee on pandemic response (as appointed by the Minister of Health) and the content of their reports, Section 4 (2) (1) is very specific in its intent to promote alternative proteins, regulate animal agriculture and phase out high-risk species.

Section 4 (2) (1) is a departure from the remainder of the Bill which is seen as allowing the Advisory Committee the flexibility to “assess”, “include” or “summarize” areas of importance whereas Section 4 (2) (1) is written in a top-down, heavy approach to “regulate” and “phase out”.

As a result, this Bill has already made the decision for the Advisory Committee that these areas are in need of regulation and has removed the ability for any assessment or summarization. In fact, the wording of this Bill only allows the Advisory Committee to provide measures for regulation and phasing out, otherwise they have not performed their role as required in the Bill.

CFC believes that the basis of this section makes a judgment call that animal agriculture is the cause of pandemics – a notion that is not supported and does not represent the cause of diseases listed in the preamble of the Bill. This premise is tied to the initiative of promoting the production of alternate proteins, which is a specific example not seen elsewhere in the Bill. Initiatives to promote alternative proteins in a Bill on pandemic prevention and preparedness is misplaced and misaligned with the Bill’s objectives. CFC believes that Section 4 (2) (1) is too limiting in its direction and in turn could distract the Advisory Committee from more beneficial areas of work.

In addition, the areas put forth under 4 (2) (1) only pertain to the Minister of Agriculture and Agri-Food, whereas (i) antimicrobial resistance is not an issue solely contained to agriculture.



In using the One-Health approach as discussed in the Bill, antimicrobial resistance is an issue that needs to be tackled from the human, animal and environmental perspective. If the intent of 4 (2) (1) (i) is to remain in the Bill, it should be re-worded and be inclusive of the One-Health approach.

Recommendation 1: CFC’s recommendation is that Section 4 (2) (1) be removed to allow the Advisory Committee the flexibility to undertake its mandate and to focus its attention on pandemic prevention and preparedness.

Recommendation 2: CFC’s recommendation is that Section 4 (2) (1) be removed, or that the wording of the Bill be altered to reduce its focus on animal agriculture and the promotion of alternate proteins, and that the use of “regulate” and “phase out” be changed to consistently use “assess” or “summarize” throughout the Bill so that the Advisory Committee can be flexible in undertaking its mandate.

Antimicrobial Use and Resistance – One Health Approach Case Study

Government and industry are working collaboratively from a One-Health Approach as it pertains to Antimicrobial Use and Resistance (AMR). During the development of the Pan-Canadian Action Plan on AMR, several cross-sectoral meetings were held with human and agricultural representatives to help inform the process.

On the agriculture side, the Canadian Food Inspection Agency (CFIA), Health Canada (HC) and the Public Health Agency of Canada (PHAC) have actively worked with industry to ensure responsible antibiotic use and a continued focus on resistance.

As a result of these interactions, CFC’s *Responsible Antimicrobial Use Strategy* works in direct



collaboration with the Pan-Canada Action Plan on AMR. In supporting the responsible use of antimicrobials that have been approved by the Veterinary Drugs Directorate of Health Canada, CFC's *Responsible Antimicrobial Use Strategy* has been founded on the key elements of reduction, surveillance, stewardship, research and innovation to meet consumer expectations, to protect the health and welfare of birds, and to preserve effective treatment options.

A major initiative of CFC's strategy has been the elimination of the preventive use of Category I and II antimicrobials – those antimicrobials of greatest importance to human medicine. The effectiveness of these policies on reduced antibiotic use and reduced antibiotic resistance in targeted bacteria has been demonstrated by PHAC's Canadian Integrated Program for Antimicrobial Resistance Surveillance (CIPARS) program.

CFC's strategy has been strengthened by Health Canada's initiatives to eliminate over-the-counter sales, to require veterinary oversight of medically important antimicrobials and to remove growth promotion claims from antibiotics of medical importance to humans.

Together, sector-specific and government regulatory and policy initiatives promote responsible use, giving confidence to consumers about the use of antibiotics, and working collectively from a One-Health Approach.