

Humane Transportation of Animals

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July 28, 2006

Dear Dr. Doonan:

On behalf of the Ontario Cattlemen's Association (OCA) and the Ontario Cattle Feeder's Association (OCFA) please find following comments responding to CFIA's advance notice of possible changes to Animal Transportation regulations in Canada.

OCA is a producer organization advocating on behalf of 21,000 beef farmers in the province. OCFA is a producer organization representing feedlot operators. Following the initial posting of CFIA's consideration for changes to the transportation regulations, OCA and OCFA received significant feedback from both our membership and other industry stakeholders.

In response, OCA established a Transportation Committee composed of representatives from the OCA, OCFA, Ontario Livestock Trucker's Association and the Canadian Cattlemen's Association (CCA).

OCA had previously provided input and subsequent endorsement of the CCA submission to your office. Find following Ontario-based comments that compliment the CCA submission. However, these comments are provided as general in nature, and do not address specific details regarding loading densities and transit time. It is our view that Canadian-based research to appropriately assess current and proposed regulation changes is currently unavailable.

To address this research gap, OCA is commissioning a three year study from the University of Guelph that will provide regionally accurate information on transportation practices and also consider factors that may influence both animal care and industry economic impacts. We recognize the study will not be near completion if in fact regulation changes are approved and gazetted. However, approval of such a study indicates industry's commitment to gathering real and defensible data on Canadian-based transportation practices and protocols.

In response to some of the specific areas highlighted within the CFIA consultation document OCA and OCFA offer the following comments:

Definition of Loading Densities

- Need to allow flexibility for distance, age and season
- Any changes to status quo should be based on validated research

Segregation

- Producer, owner and driver should determine safety of co-mingling animals particularly for cull cow and bulls from the same herd

Transit Time

- Ontario beef industry stakeholders are interested in time restrictions as a result of the routine east/west movement of cattle across Canada. For cattle coming to Ontario from points west of Manitoba, Thunder Bay is considered the rest spot. However, based on the experience of

producers who have shipped multiple loads of cattle, quick recovery time is largely the result of conscientious driving with appropriate on truck rest stops during the cooler times of day. Loading and unloading of cattle can often cause unnecessary stress on cattle. Normal producer practice would be to feed and water cattle if in transit for over 36 hours.

- Transit time should be timed when cattle are moving on the truck.
- OCA and OCFA support a clearer definition of travel times.

Definition of Competent Persons

- Following the BSE crisis a number of truck drivers exited the industry. In our opinion those remaining drivers are fully committed to livestock trucking.
- Competency should refer to persons skilled and knowledgeable, either through training or experience, in the care and transport of animals and in the laws with respect to animal transport
- If training is required it must be meaningful and include both individuals that also may load/unload livestock.

Animal Owner/Agent/Carrier Responsibilities

- To ensure appropriate due diligence, responsibility for proper livestock handling and transportation must be equally applied to drivers, owners/agents and buyers/receivers of cattle.
- Currently the regulations are unclear that owners or agents are also liable for the care of animals in transport.

Responsible transport of cattle is not only an animal care issue but one of economics. Changes to transportation regulations should not place producers at a competitive disadvantage. Canada is well-established as an agricultural leader on animal production, animal care and welfare issues. Globally our reputation speaks for itself; we should be cautious of making changes to policy unnecessarily.

On behalf of the OCA and OCFA, thank you for the opportunity to comment.

Sincerely, Sincerely,

Ian McKillop, OCA President
Curtis Royal, OCFA President