

February 6, 2019

The Honourable Lawrence MacAulay
Minister of Agriculture and Agri-Food
House of Commons
Ottawa, Ontario
Canada
K1A 0A6

To the Hon. Lawrence MacAulay,

We, the undersigned, call on the Ministry of Agriculture to immediately release improved amendments to the *Health of Animals Regulations (Humane Transportation)*.

Canada's animal transport regulations are severely outdated, having been last updated in 1977. Farm animals can legally be transported for up to three days without food, water or rest, or adequate protection from inclement weather. The result is that approximately 14 million farm animals arrive dead, dying or injured at federally inspected slaughterhouses each year because transport conditions are so poor.

The draft amendments released by your ministry in December 2016 only offer minor improvements to the existing regulations. Investigations into the Canadian Food Inspection Agency's (CFIA) internal review process revealed that the proposed amendments were directly influenced by livestock industry representatives who strongly oppose any changes to the regulations. For example, meat, poultry and egg producers have lobbied vigorously to ensure that maximum allowable transportation times are not reduced. Alarming, even though internal briefings show that CFIA staff recognize shorter transport times (eight to 12 hours) are better for animals, the times in the proposed amendments were increased to up to 36 hours, directly as a result of industry lobbying.

It is unacceptable for the regulations to prioritize economic interests over animal care. Our national animal transport regulations should reflect the vast body of scientific evidence concerning animal well-being as well as Canadian societal values that oppose the needless suffering of non-human animals. They should also be aligned with the standards of our international trading partners and the World Organisation for Animal Health.

Further, the proposed regulatory framework is largely outcome-based, which is vague and very hard to enforce. The new regulations must be predominantly prescriptive in outlining clear, specific requirements for the provision of food, water and opportunities to rest, protection from the elements, in-transport space allowances, and appropriate handling techniques. Where specific, prescriptive measures are not possible, outcome-based measures must be accompanied by adequate surveillance and enforcement to ensure compliance.

We urge you to ensure the amended regulations are evidence-based and driven by science. The updated regulations are a chance to reduce needless animal suffering during transport and establish Canada as a leader, not a laggard, in adopting the best available research into regulation. It is a chance we cannot afford to miss.

Signed,

Humane Society International/Canada
Montreal Society for the Prevention of Cruelty to Animals

Humane Canada
 Canadian Coalition for Farm Animals
 Animal Justice
 Mercy For Animals
 Vancouver Humane Society
 Edmonton Humane Society for the Prevention of Cruelty to Animals
 Winnipeg Humane Society
 Canadians for Ethical Treatment of Farmed Animals
 Animal Alliance of Canada
 Animal Protection Party of Canada
 Canadians Against Live Export – YYC
 Canadian Horse Defence Coalition
 Born Free USA
 Voice For Animals
 Foundation of Animal Welfare Issues
 The Save Movement
 Toronto Pig Save
 Toronto Chicken Save
 Toronto Cow Save
 Edmonton Animal Save
 The Responsible Animal Care Society (TRACS)
 Elizabeth May, M.P., Leader of the Green Party of Canada
 Nathaniel Erskine-Smith, M.P., Liberal Party of Canada, Beaches — East York
 Maureen Harper, D.V.M., M.Sc.
 Judith Samson-French, D.V.M., M.Sc., Banded Peak Veterinary Hospital, Alberta, Canada
 Moira Drosdovech, D.V.M.
 Michael Lavroff, D.V.M.
 Jean-Jacques Kona-Boun, D.V.M., M.Sc., Diplomate American College of Veterinary Anesthesia and Analgesia

