

# EMERGENCY SLAUGHTER - UPDATE TO THE TRANSPORTATION OF ANIMALS PROGRAM

## Issue

In order to reduce food waste, and to keep beef stock off the black market, producers and licensed abattoirs need the ability to work with the Canadian Food Inspection Agency (CFIA) and veterinarians to assess both compromised and unfit animals for possible transport to slaughter facilities.

## Background

The health and welfare of all animals is of the utmost importance to all sectors of the meat producing industry. The Canadian Food Inspection Agency states "Protecting animal welfare in Canada is a shared responsibility between governments (federal, provincial, and territorial), and industry (producers, transporters and staff in registered slaughter establishments).<sup>1</sup> With this statement in mind, industry currently has a concern regarding the transportation requirements for compromised animals. With the current regulations in place that deem 'unfit' animals only available for transport to a veterinary establishment there is the potential for food waste, as well as undue costs being placed on producers to send these animals to the veterinarian.

Industry states that certain compromised animals can be humanely transported to a slaughter facility using specialized provisions for transport to ensure the animals do not incur any undue suffering, however this transport provision does not include animals deemed 'unfit' who are only allowed to be transported to a veterinary establishment. The CFIA "recognizes that some degree of suffering by all animals is inevitable"<sup>2</sup> and in these cases the animal would incur the same amount of discomfort being transported to a veterinary clinic as it would being transported to an approved slaughter facility, and would be treated with the same utmost care upon arrival. Federally inspected slaughter plants are already required to follow policies related to handling of non-ambulatory animals as referenced in the *Transportation of Animals Program Compromised Animals Policy*.

The 'Rationale' section of the Canadian Food Inspection Agency's *Transportation of Animals Program Compromised Animals Policy* states:

"Loading and unloading a non-ambulatory animal with the intent of providing veterinary diagnosis or treatment does not expose the animal to unjustified and unreasonable suffering. In fact, veterinary diagnosis or treatment has an associated animal welfare benefit for either the transported animal or the herd of origin.

In this regard, the suffering that the animal will endure is not undue. The Regulations refer to "undue suffering," recognizing that some degree of suffering by all animals is inevitable. The qualifier "undue" prevents the word "suffering" from being taken literally. Therefore, the loading of a non-ambulatory animal can be carried out in accordance with the Health of Animals Regulations to provide veterinary diagnosis or treatment."

With this rationale in mind, it can also be argued that transportation of an unfit animal to an approved slaughter facility does not cause 'undue suffering' as the animal will receive an ante-mortem inspection from a licensed

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<sup>1</sup> Canadian Food Inspection Agency  
<http://www.inspection.gc.ca/animals/terrestrial-animals/humane-transport/eng/1300460032193/1300460096845>  
Accessed June 1, 2016

<sup>2</sup> Canadian Food Inspection Agency  
<http://www.inspection.gc.ca/animals/terrestrial-animals/humane-transport/compromised-animals-policy/eng/1360016317589/1360016435110#aboutthecfia>  
Accessed June 1, 2016

inspector which will be beneficial to the producer and potentially the herd of origin, and the animal can be salvaged for processing which solves a food waste issue that is also of concern with compromised animals.

Current Health of Animals Regulations prohibit the movement of some compromised animals to an accredited slaughter facility, allowing these animals to only be transported for veterinary treatment. Part X11, section 138, point 2 states:

“(2) Subject to subsection (3), no person shall load or cause to be loaded on any railway car, motor vehicle, aircraft or vessel and no one shall transport or cause to be transported an animal:

(a) that by reason of infirmity, illness, injury, fatigue or any other cause cannot be transported without undue suffering during the expected journey;

(b) that has not been fed and watered within five hours before being loaded, if the expected duration of the animal’s confinement is longer than 24 hours from the time of loading; or

(c) if it is probable that the animal will give birth during the journey.

(2.1) For the purpose of paragraph (2)(a), a non-ambulatory animal is an animal that cannot be transported without undue suffering during the expected journey.

(2.2) Despite paragraph (2)(a), a non-ambulatory animal may be transported for veterinary treatment or diagnosis on the advice of a veterinarian.”

According to a CFIA guidance document entitled *Livestock Transport Requirements in Canada* certain compromised animals may be transported directly to an “appropriate slaughter establishment” if steps are taken to prevent additional injury or undue suffering; however this excludes animals that are deemed “unfit”. Excluding an entire section of animals from being transported to a slaughter facility, but allowing them to be transported to a veterinary establishment does not assist the animal from any suffering during transport. Unfit animals can be humanely slaughtered at an approved abattoir and not endure any more suffering than would be incurred being transported to a veterinarian.

Oftentimes an animal being transported to the nearest approved slaughter facility is the way to have the animal addressed as quickly and humanely as possible, and this is the ultimate objective when considering animal welfare.

## **Recommendations**

That the federal government:

1. Update and expand the *Health of Animals Regulations Act Part XII – Transportation of Animals*, to include transportation requirements for animals deemed ‘compromised’, animals deemed ‘unfit’, and animals deemed ‘non-ambulatory’ to remain consistent with definitions provided in the Canadian Food Inspection policy titled *Transportation of Animals Program Compromised Animals Policy*.
2. Work with the Canadian Food Inspection Agency to update all documents regarding the transportation of compromised animals including but not limited to the *Health of Animals Regulations, Transportation of Animals Program Compromised Animals Policy* and the guidance document *Livestock Transport Requirements in Canada* to include that compromised animals and unfit animals may be transported to a licensed abattoir if steps are taken to prevent additional injury or undue suffering of the animal, for humane euthanization and inspection of the meat product.

**SUBMITTED BY THE MEDICINE HAT & DISTRICT CHAMBER OF COMMERCE**