



Submission

**DAIRY FARMERS OF CANADA'S PRESENTATION TO THE HOUSE OF COMMONS STANDING COMMITTEE
ON AGRICULTURE AND AGRI-FOOD**

Bill C-205, An Act to Amend the Health of Animals Act

June 4th, 2021

Dairy Farmers of Canada (DFC) is the national policy, advocacy and promotional organization representing Canadian dairy producers. Canadian dairy farmers are an integral part of our national food supply as they produce safe, nutritious, high-quality milk under some of the world's most stringent standards and practices. This milk is then transformed by dairy processors into thousands of dairy products consumers know and love.

This important work of feeding the nation would not be possible without the animals under our care. Cows are the foundation of what we do, and their treatment is of utmost importance. Canadian dairy farmers work to uphold the highest standards in animal care and ensure the health of their herds.

That is why we support Bill C-205, *An Act to Amend the Health of Animals Act*.

Strict biosecurity measures are in place at every Canadian dairy farm to mitigate the risk of exposure to potentially dangerous diseases or toxic substances that are capable of affecting the health of dairy cattle. The implementation of strict entry protocols is one of the most crucial aspects of these biosecurity requirements – when those protocols are not followed, animals are put unnecessarily at risk.

Current Canadian legislation does not adequately ensure the protection of farm animals against the unauthorized entry of individuals, into enclosed places in which they are kept - particularly individuals who are not well informed of the robust on-farm biosecurity measures and procedures. Such unauthorized incursions on farms can expose animals to severe health risks, with potentially devastating effects. Bill C-205 would offer enhanced protections to deter such actions.

Our submission describes the high standards followed on Canadian farms, with particular emphasis on the areas of animal care and biosecurity, and discusses the potential risks of unauthorized entry into places where animals are kept.

The proAction® Initiative: Ensuring High Standards of Practice on Canadian Farms

The Canadian dairy sector is committed to upholding the highest standards and providing transparency into our practices. This is why the sector established the comprehensive proAction® program. The proAction® initiative provides an efficient and co-ordinated national quality assurance framework for dairy farmers to demonstrate and document best practices in six key areas, including animal care, biosecurity and cattle traceability.

proAction® builds on robust federal and provincial regulations, instilling confidence that every drop of Canadian milk was produced with care under some of the world's most stringent standards.

Mandatory for all Canadian dairy farms, proAction® continually evolves to reflect the latest best practices. Dairy Farmers of Canada is continuously investing in research to ensure our dairy farming practices stack up to the science. Our research budget surpasses \$2 million per year, including funding for animal science research and milk production research, which contribute to identifying new best practices.

The proAction® program underpins DFC's iconic Blue Cow logo, which is found on thousands of milk and dairy products made with 100% Canadian milk and milk ingredients. The Blue Cow reassures consumers of the high Canadian standards behind our milk.

Implementing Best Practices in Cow Health, Comfort and Care: The Animal Care Module

Providing excellent animal care is one of the most important job requirements when you are a Canadian dairy farmer. Under proAction, Canadians can be confident that the milk they enjoy was produced by farmers who are dedicated to the well-being of their cattle.

Under proAction, all farms implement animal care practices based on the requirements in the *Code of Practice for the Care and Handling of Dairy Cattle* published by the National Farm Animal Care Council (NFACC). This science-based, nationally developed guideline contains both requirements and best practices for dairy cattle care and handling. It was developed with input from the scientific community and a wide range of stakeholders, including farmers, technical experts, veterinarians, animal welfare organizations, food processors, governments, retailers and foodservice providers.

Some of the on-farm practices required under proAction® include:

- Comfortable, clean housing
- Top quality feed and water for optimal health and growth
- Medical care, when needed, and pain control for necessary animal health practices
- Special care for vulnerable animals and careful end-of-life management
- Quiet, calm animal handling
- Pre-transport decision making

Staff trainingAnimal care is a top priority for Canadian dairy farmers, as they know that it leads to a healthier and more productive herd. Farmers use science-based indicators and work with experts to continuously monitor and improve the comfort and health of their herds and record their performance.

In addition, cattle assessments are completed every two years through a partnership with Holstein Canada, allowing farmers to monitor their herds' results over time and compare their progress against established benchmarks and the progress of their peers.

Investing in research to improve dairy animal health, comfort and care

Separate but related to proAction®, DFC has also invested extensively in animal care research since 1996. Animal health and welfare is one of the four major priority areas targeted in DFC's National Dairy Research Strategy and is allocated approximately 25% of research investments. These investments are leading to important advances in dairy animal comfort and care practices.

Mitigating Risk: The Biosecurity Module

The health of the herd is a top priority for Canadian dairy farmers. Maintaining a rigorous and credible program is important to preserving and improving herd health and limiting the potential spread of disease. As such, the underlying premise behind proAction's biosecurity module is the old adage that 'an ounce of prevention is worth a pound of cure.' Farmers focus on managing risks and preventing the introduction of disease into and its spread within a herd. Every aspect is designed animal health, maintain farm efficiency and the high quality of Canadian milk.

Dairy Farmers of Canada worked with the Canadian Food Inspection Agency (CFIA) to develop national standards for biosecurity on Canadian dairy farms. The *Standard and Producer Planning Guide* were first published in 2013.

One of the most important aspects of biosecurity is controlling traffic and visitors. Authorized farm visitors, like veterinarians and service providers understand that pathogens can be introduced and spread by contaminated footwear, clothing, and hands, as well as vehicles, farm machinery and other equipment, and they must take action to prevent such introduction or spread of contamination.

In addition to closely monitoring the movement of visitors, biosecurity requirements under proAction® include segregating new animals introduced onto the farm for disease detection, biosecurity signage, and maintaining clear records of diseases on the farm. Dairy farmers clean and disinfect equipment used on the farm, ensure that protective equipment is worn by visitors when necessary and make certain that the driveways to their barns are kept clean to minimize accidental propagation of bacteria from, or to, other farms. Animals are regularly tested, vaccinated and, if necessary, treated.

Additionally, farms must conduct a Biosecurity Risk Assessment Questionnaire with their herd veterinarian every two years and implement clearly documented Standard Operating Procedures (SOP) related to biosecurity.

As with all modules of the proAction® program, continuous learning and improvement are values that are fostered at every stage.

Unauthorized Incursions on Farms put Animals at Risk

An individual entering a farm without permission may not be aware of or may not respect biosecurity requirements, which are critical to preventing the introduction and spread of disease. Failure to respect entry protocols or previous exposure to other animal sites could have severe implications on the health of farm animals.

Unauthorized entry or interference on farms is often linked with organizations experienced in protesting and there have been several instances where trespassers took aggressive actions against producers and other agricultural stakeholders.

Entering a farm without permission creates a gap in the sophisticated traceability (contact-tracing) chain in place in the agri-food sector which helps ensure our food is safe for consumption.

DFC believes in democracy and fundamental rights of citizens to protest and disagree in a public space. However, farms are private spaces. Actions that threaten the health, safety and well-being of people and animals on farms or anywhere in the food supply chain should be prohibited and those responsible for such actions should have consequences. Biosecurity protocols are not intended to restrict access to farms or transparency into our practices, but to ensure that animal health is not compromised. The unlawful entry of a person or a group of people compromises all the biosecurity efforts of farmers. The essence of the *Health of Animal Act* is to ensure that any individual or tool that penetrates farm ground can have all its movement traced back and traced forward to equally protect all animals, farmers and Canadians across the country.

Biosecurity is not the only risk of unlawful entries, as inappropriate interactions with the animals can cause them undue stress. Intruders can also knowingly or unknowingly damage farming facilities and equipment and cause serious stress in the life of humans who are proud to feed the Canadian population.

Furthermore, we believe the wording of the bill could be strengthened in order to offer an even better protection to farm animals. As it currently reads, an individual who unlawfully enters a building or other enclosed place in which animals are kept is only liable for exposing or contaminating animals if he or she did so knowing that, or being reckless as to whether entering such a place could result in the exposure of the animals to a disease or toxic substance that is capable of affecting or contaminating them. It is in our opinion that the requirement of knowledge or recklessness should be removed to ensure the bill fulfills its intended purpose, which is to protect animals from dangerous toxic substances and pathogens as well as undue stress.

In addition, we believe the bill should explicitly protect animals against any person who aids another to contravene to the act, as unauthorized entry or interference on farms is often linked with organizations or unofficial group of people indifferent to any negative repercussions caused by their indirect involvement.

Conclusion

The need for domestic food security has never been more evident than during the COVID-19 pandemic as the food supply chains have been greatly disrupted and we, as a country, must do more to protect the access to nutritious Canadian products. An important component of this food security protection is ensuring that farm animals are healthy and not exposed to substances or pathogens that are capable of affecting or contaminating them.

Dairy Farmers of Canada strongly urges the government and all political parties to support Bill C-205 as it will ensure all farm animals, including dairy cows, are protected from unauthorized entry on farms and mitigate the risk of dangerous diseases and toxic substances. The passage of this bill would align with the measures already taken by dairy farmers to ensure health of the animals under the proAction® program.

Further, we believe the bill could be strengthened by removing the knowledge or recklessness element and by extending it to apply to those who aid others to contravene the act.

Therefore, DFC recommends the following:

- 1- That the Government support Bill C-205 and the following amendments to its wording :

ORIGINAL:

“Exposure of animals to disease or toxic substance

9.1. *No person shall, without lawful authority or excuse, enter a building or other enclosed place in which animals are kept knowing that or being reckless as to whether entering such a place could result in the exposure of the animals to a disease or toxic substance that is capable of affecting or contaminating them.”*

AMENDED:

“Exposure of animals to disease or toxic substance

9.1.(1) *No person shall, without lawful authority, enter a building or other enclosed place in which animals are kept, to prevent the exposure of the animals to a disease or toxic substance that is capable of affecting or contaminating them.*

(2) Any person who aids or abets another to contravene paragraph (1) shall be considered a party to that contravention."

- 2- *That the Government make every effort to protect farm animals from unauthorized entry of individuals into the enclosed place in which they are kept.*