

Brief on Federal Bill C-205

I am a citizen residing in Regina, Saskatchewan and I am deeply concerned about [Bill C-205](#), *An Act to Amend the Health of Animals Act*. My concerns are the following:

1. This bill does not address the root cause of threats to biosecurity. The most significant threat to biosecurity on farms is farming practices, not trespassers. There is not a single documented case of an animal advocate introducing a biosecurity threat onto a farm in Canada based on investigations by the Canadian Food Inspection Agency (1). In contrast, disease outbreaks are usually caused by sharing equipment, workers or vehicles transferring viruses from other farms or wild animals, or in the case of COVID-19 on mink farms in British Columbia, just the workers themselves who transferred it to the mink (2). Once a disease occurs, it spreads quickly because of the extreme conditions that animals on most farms are living in. Most farm animals are kept in crowded cages and warehouses under stressful conditions, which is a breeding ground for outbreaks.

Furthermore, research has shown that many Canadian farms are not adhering to voluntary biosecurity protocols that would prevent such outbreaks, such as limiting visitors, changing clothing and footwear, handwashing and other sanitary measures (3, 4, 5). Visitors are only a risk if they had recently been to another animal agriculture facility, which is very unlikely (6). Therefore, it is the farm and slaughterhouse owners, operators and staff who are the primary source for biosecurity threats on farms, and these risks are not covered by this bill.

2. It is already a legal offence to trespass and deliberately harm animals and therefore, this bill is unnecessary.
3. Provinces have jurisdiction over trespassing laws. Therefore, this bill is intruding on provincial legislation.

My recommendations are:

1. Base any further legislation on biosecurity threats using evidence-based information.
2. Introduce animal welfare regulations protecting animals while they are living on farms. Regulating transport and slaughter is not enough. Improving the conditions of farmed animals will reduce the risk of biosecurity threats.
3. Introduce proactive monitoring of animal welfare conditions on farms. The reason people trespass on farms is because of the lack of transparency and oversight in animal agriculture. The Canadian public needs to be able to make informed choices about where their food comes from.

Sincerely,
Dr. Jennifer St. Onge

References

1. Animal Advocacy or Animal Agriculture? Disease Outbreaks & Biosecurity Failures on Canadian Farms. (2021, May 13). Animal Justice. <https://animaljustice.ca/wp-content/uploads/2021/05/Disease-Outbreaks-Biosecurity-Failures-on-Canadian-Farms-May-202021.pdf>
2. Canadian Press. (2021, December 24). COVID-19 has made its way to second B.C. mink farm, but no workers reported sick. National Post. <https://nationalpost.com/news/canada/canadian-press-newsalert-mink-on-second-bc-farm-test-positive-for-covid>
3. Denis-Robichaud, J., Kelton, D.F., Bauman, C., Barkema, H.W. (2019) Biosecurity and herd health management practices on Canadian dairy farms. Journal of Dairy Science. 2019 July 102(10).https://www.researchgate.net/publication/334660417_Biosecurity_and_herd_health_management_practices_on_Canadian_dairy_farms
4. Kylie, J., Brash, M., Whiteman, A., Tapscott, B., Slavic, D., Weese, J.S., Turner, P. V. (2017) Biosecurity practices and causes of enteritis on Ontario meat rabbit farms. Canadian Veterinary Journal. 2017 Jun; 58(6): 571-578. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5432143/>
5. Racicot, M., Venne, D., Durivage, A., Vaillancourt, J. (2011) Description of 44 biosecurity errors while entering and exiting poultry barns based on video surveillance in Quebec, Canada. Preventative Veterinary Medicine. 2011 July 1;100(3-4): 193-9. <https://pubmed.ncbi.nlm.nih.gov/21605922/>
6. Canadian Food Inspection Agency. (2013, July 22). National Farm-Level Biosecurity Planning Guide Proactive Management of Animal Resources. Government of Canada