Submission to the House of Commons Standing Committee on Health (HESA)

Re: Bill C-293, Pandemic Prevention and Preparedness Act

Melissa Matlow, Canadian Campaign Director, World Animal Protection

Dear Chair and Committee Members,

World Animal Protection is an international animal welfare charity with offices in 12 countries and more than 300,000 supporters across Canada. We work with governments, corporations, and communities to develop sustainable evidence-based solutions that help people and animals alike. We have General Consultative Status with the UN, a formal working relationship with the World Organization of Animal Health (WOAH) and are members of the National Farm Animal Care Council (NFACC).

World Animal Protection supports Bill C-293 because it takes a One Health approach to pandemic prevention, requiring government to address the underlying causes of pandemics.

75% of new or emerging infectious diseases over the past decade originated from animals; principally from wildlife (e.g., Mpox, Ebola, SARS, MERS, HIV/AIDS, Avian Flu, Swine Flu, West Nile, Nipah, Zika, COVID-19).[i] Our mistreatment of animals and nature is increasing the frequency and severity of disease outbreaks and the likelihood of the next pandemic.

The wildlife trade (both illegal and underregulated legal trade), live animal markets and industrial animal agriculture have been identified as top drivers of pandemic risk and biodiversity loss in reports by United Nations Environment Programme (UNEP), International Livestock Research Institute (ILRI)[ii] and the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES)[iii]. These drivers are also named in the current draft of the World Health Organization (WHO) 'Pandemic Treaty'[iv] and acknowledged in Bill C-293.

We support the current wording of the bill but if it is to be amended at Committee, there are three important aspects of the bill that we urge you to retain and where possible, strengthen:

(1) It is important that the bill retains its reference of a One Health approach and that this refers to the interconnectedness of the health and welfare of animals, people, and the planet.

The Bill requires the Minister of Health or ministers referred to in subsection (2) 'use a multisectoral and multidisciplinary collaborative approach, known as a One Health approach, that focuses on the human, animal, plant and ecosystem health and welfare interface'. This language should be retained.

Western notions of One Health were long preceded by traditional forms of knowledge, including Indigenous ways of knowing, which recognizes and respects the interconnectedness among all beings. A recent paper published in the Canadian journal, FACETS speaks to this history and the 'groundswell of One Health initiatives' in Canada and the need for a One Health paradigm shift.[v] One Health has been identified in many international documents, including as part of the IHR core capacities[vi], the One Health Joint Plan of Action and the recent Kunming-Montreal Global Biodiversity Framework, and is an important part of Canada's actions to pandemic prevention, preparedness and response.

Improving animal welfare is a central part of applying a One Health approach to preventing pandemics. When animals are kept in poor welfare conditions, it can negatively impact their health. Animal immune systems are compromised when they are kept in crowded, unsanitary and stressful conditions and this creates an ideal environment for the emergence, mutation and spread of infectious diseases that can then be transmitted to humans. Free roaming wild animals can also be stressed. For example, research has found that bats shed more Hendra virus after being stressed by food shortages, which have increased because of habitat destruction. And while research like this can help predict when spillovers will happen, preventing future pandemics, scientists struggle to obtain funding for this important work.[vii]

Animal welfare solutions can have many other co-benefits for human health and environmental health. For example, when farm animals are raised in higher welfare conditions, this can reduce the need for prophylactic antimicrobials and preserve the effectiveness of those drugs for human medicine. Policies that help transition away from intensive farming practices can also protect our environment by decreasing pollution. Our research has found antimicrobial-resistant material in waterways downstream from intensive livestock operations in Canada and other countries.[viii]

(2) The bill must retain an adequate focus on prevention, including pre-outbreak measures to prevent pathogen spillover at the human-animal-environment interface.

We believe Bill C-293 places appropriate emphasis on prevention in Section 4 which outlines what needs to be considered in a national Pandemic Prevention and Preparedness Plan.

This is important because prevention of pandemics is significantly less costly than responding to pandemics once they have emerged. The IMF has estimated that the COVID-19 pandemic will cost the global economy more than $12.5 trillion by 2024.[ix] It is estimated that prevention costs less than 5% of the response.[x] Furthermore, it's been calculated that investments to prevent tropical deforestation and restricting the wildlife trade would cost as little as 2% of the economic costs of responding to the COVID-19 pandemic.[xi]

Prevention cannot just be about improving surveillance. Surveillance alone is insufficient to prevent pandemics - it cannot always fully identify new pathogens, detect asymptomatic animals, or prevent pathogen mutation and emergence.

(3) The bill must retain an acknowledgement of the top pandemic drivers and the requirement that government address these.

Section 4 (2) (l) of the bill identifies measures the Minister of Agriculture and Agri-Food and the Minister of Industry and provincial governments should take to reduce pandemic risk including by addressing antimicrobial resistance, regulating and/or phasing out industrial animal agriculture and commercial activities that involve high-risk species and by promoting commercial activities that reduce pandemic risk including the production of alternative proteins. We highly recommend that high welfare farming be added in Section 4 (2) (l) (iii) as another commercial activity to promote to reduce pandemic risk.

Section 4 (2) (m) of the bill identifies measures the Minister of Environment should take including to reduce the risk associated with the commercial wildlife trade in Canada and abroad and measures to regulate or phase out live animal markets. This language should be retained

as it acknowledges the need to address the top pandemic drivers identified in the UNEP/ILRI and IPBES reports and referenced in WHO's draft 'Pandemic Treaty'.

Particular attention needs to be paid to the following key drivers:

The commercial wildlife trade

The bill should recognize the role of the commercial wildlife trade in driving pandemic risk. It is widely acknowledged that a wildlife market in Wuhan, Hubei Province, China and the wildlife farms that supplied it, played a significant role in the COVID-19 outbreak.[xii] This market had a section which sold many live and dead wild animals including snakes, hedgehogs, crocodiles and raccoon dogs. The 2002 SARS outbreak was also linked to a wildlife market, in this case the sale of Himalayan palm civets.[xiii] The risk of disease outbreaks increases significantly at every step of the supply chain[xiv] as animals are exposed to a wider variety of other wildlife species and endure prolonged stressful and often unsanitary conditions which impacts their immune system resulting in environments where diseases can develop, mutate, and thrive.

This is why scientists and parliamentarians around the world have called for the closure of wildlife markets and associated trade. Germany, Netherlands, China, and Italy have already taken important steps to curb the domestic trade in wild animals and wild animal products. For example, the Netherlands has expedited a permanent ban on fur farming to prevent further COVID-19 outbreaks and the German Federal Parliament has agreed to reduce the trade in wild animals for pets, ban the sale of wild caught animals and set up a centralized trade register. [xv]

Canada should follow suit. More than 1.8 million wild animals were imported into Canada between 2014 and 2019 and 93% were seemingly not subject to any permits or pathogen screening.[xvi] The majority of these animals are being traded to supply the exotic pet trade.

Intensive animal farming

Agricultural intensification is responsible for over 50% of infectious diseases from animals since 1940.[xvii] Many of the most recent zoonotic disease outbreaks, such as avian flu and swine flu, are associated with intensive poultry and pig production systems with poor animal welfare and animal husbandry standards.[xviii]

Intensive farming forces stressed animals into tightly packed sheds, increasing the risk of diseases like swine flu or bird flu that can jump to humans. Animals kept in poor conditions, including during transport, are more susceptible to disease infection, mutation and spread.

In an open letter to the WHO published in The Lancet, over 200 medical and scientific experts identified industrial animal agriculture as a significant pandemic threat and major contributor to antibiotic resistance, stating "Industrial animal farming contributes to the rise of antibiotic resistance and pandemic threats in two major ways: first, through the widespread "low-dose" use of antibiotics on farms; and second, by rapidly expanding deforestation in order to supply grazing and feed land for cattle, which brings human beings in closer contact with wild animals that may carry emerging zoonotic disease."[xix]

Antimicrobial resistance

The WHO calls the rise in antimicrobial resistance the invisible or silent pandemic and one of the top ten global health threats facing humanity this decade. Nearly five million people died because of AMR in 2019.[xx]

In 2019, 78% of all antibiotics sold and distributed in Canada were for farm animals, contributing to the rise to antimicrobial resistant superbugs.[xxi] Farmers often administer antibiotics not merely to treat infections, but to help prevent infections that are facilitated by keeping animals in poor conditions such as over-crowding. These conditions also facilitate the spread of new viruses. The EU has banned prophylactic antibiotics in farming as of 2022. Denmark, Sweden, Finland, Norway, Iceland, and the Netherlands had already done so. There is strong support from NGOs, scientists, and Canadians for government action on this issue: 89% of Canadians believe the overuse of antibiotics in farm animals is wrong and 82% believe antibiotics should only be used to treat sick animals.[xxii]

Government must do everything it can to try to prevent future pandemics from happening and animal health and welfare play a critical role in this. This was also confirmed at the latest UN Biodiversity COP (COP15) in Montreal where Canada alongside all other signatories agreed to the world's biodiversity goals for the next 10 years, and where Targets reference the interconnectedness of people, animals and our shared environment.

In closing, World Animal Protection urges Committee Members to pass a strong bill that retains recognition of the need for a One Health approach to pandemic prevention, recognizing the important role of animal welfare in this approach and the need to regulate and/or phase-out high-risk animal activities that drive pandemic risk, including live animal markets, the commercial wildlife trade, intensive animal farming practices and antimicrobial resistance.

Thank you for your consideration.

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[i] Jones KE, Patel N, Levy M, et al. Global trends in emerging infectious diseases. Nature 2008; 451:990-94.
[ii] United Nations Environment Programme, & International Livestock Research Institute (2020). *Preventing the Next Pandemic: Zoonotic Diseases and how to Break the Chain of Transmission*. https://wedocs.unep.org/20.500.11822/32316.
[iii] Intergovernmental Platform on Biodiversity and Ecosystem Services (IPBES). 2020. IPBES workshop on biodiversity and pandemics: executive summary. https://www.ipbes.net/pandemics
[iv] https://apps.who.int/gb/inb/pdf_files/inb4/A_INB4_3-en.pdf
[v] Samira Mubareka, et al;. 2023. Strengthening a One Health approach to emerging zoonoses. *FACETS*. **8**(): 1-64. https://doi.org/10.1139/facets-2021-0190
[vi] WHO Joint external evaluation of IHR core capacities of Canada: mission report, 11-20 June 2018. WHO-WHE-CPI-2019.62-eng.pdf
[vii] https://www.propublica.org/article/funding-scientists-pandemic-prevention-spillover
[viii] https://www.worldanimalprotection.ca/news/deadly-superbugs-found-waterways-next-cruel-factory-farms
[ix] https://www.reuters.com/business/imf-sees-cost-covid-pandemic-rising-beyond-125-trillion-estimate-2022-01-20/
[x] Bernstein et al. (2022) *The costs and benefits of primary prevention of zoonotic pandemics* https://www.science.org/doi/10.1126/sciadv.abl4183
[xi] https://science.sciencemag.org/content/369/6502/379
[xii] https://www.science.org/doi/10.1126/science.abp8715
[xiii] https://science.sciencemag.org/content/302/5643/276.full
[xiv] Nyguyen Quynh Huong *et al.*; Coronavirus testing indicates transmission risk increases along wildlife supply chains for human consumption in Viet Nam, 2013-2014. Posted June 17, 2020. https://www.biorxiv.org/content/10.1101/2020.06.05.098590v3
[xv] https://dip21.bundestag.de/dip21/btd/19/253/1925345.pdf
[xvi] Data obtained from CBSA and CFIA through Access to Information Requests in 2020. The actual number of wild animals imported is likely higher as some importation numbers were recorded as unknown and only electronic records could be provided due to COVID-19.

[xvii] https://www.unep.org/resources/report/preventing-future-zoonotic-disease-outbreaks-protecting-environment-animals-and
[xviii] UN Nutrition. 2021. Livestock-derived foods and sustainable healthy diets. https://www.unnutrition.org/wp-content/uploads/UN-Nutrition-paper-Livestock-derived-foods_19may.pdf (accessed 24th September 2021)
[xix] https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(17)31358-2/fulltext
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