

CFIA Trucking Regulations

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■ Introduction

The Canadian Food Inspection Agency (CFIA) plays an important role in providing protection for animals used in food production. The Canadian Food Inspection Agency's responsibility for farm animal welfare is science-based, seeks to reflect contemporary societal attitudes, and relates to two distinct areas of the Canadian Food Inspection Agency mandate: transportation and slaughter. As part of the Canadian Food Inspection Agency's Animal Health Program, the transportation of animals is regulated to prevent undue pain or suffering in animals. Part XII of the Canadian Food Inspection Agency's *Health of Animals Regulations* defines conditions for the humane transportation of all animals in Canada by all modes of transport.

As a federal agency, the Canadian Food Inspection Agency serves all Canadians and "Animal transportation" has a much wider focus than food animals. Canadian companies are successful in international trade with domestic and exotic animals, offering travel and relocation services for household pets, and supplying the medical and scientific communities. Canadian performance horses travel regularly to events nationally and across the world. Our concern for the welfare of animals and the belief that all animals should be protected from suffering reflects the shared views of industry and the public.

■ Why Regulations?

Legislation is necessary to ensure a minimum standard; what is the minimal acceptable and tolerable to society. It is not "Regulation" that makes certain behaviour acceptable or unacceptable. "Acceptable" or "unacceptable" are largely determined by our society. Decisions on animal welfare, including during transportation, reside with society at large based on a moral philosophy

on the level of care perceived to be acceptable. Regulations provide authority to prohibit unacceptable practices, which in turn protects the majority from unfair competition from the minority who would cut corners and give the industry a bad name. Voluntary standards can aim for the high ground and are more easily updated. A blend of federal regulations and national voluntary standards is the best path to success. Concerning the transportation of animals, the goal is to minimize potential adverse effects of transportation on animal health and welfare that will result in undue suffering or injury to the animals. In the case of food animals, we also recognize the link between animal health, animal welfare and food safety.

The Canadian Pork industry has a proven track record concerning animal care and has demonstrated its continued commitment to animal welfare through the development of various industry led initiatives such as the Canadian Pork Council (CPC) Animal Care Assessment tool.

■ Why Change? Smart Regulation

The need to update regulation does not mean that industry is doing a bad job. The current regulations were created in 1970s and lack current context:

- Long distance transport has become more common than previously.
- Regulations insufficiently address the needs of all species.
- When regulations were created, they primarily addressed cattle.
- Today, a broad range of species, including exotics, are routinely transported.
- The science regarding animal physiology, welfare and health has evolved making certain current requirements inadequate.

Modernization of regulations will ensure that Canada keeps pace with international standards. Standards for the transportation of animals by land and sea have now been established by the World Organization for Animal Health (OIE). Canada's current regulations need to be aligned. Canadian regulations are consistent with OIE Standards. However, some areas of the Canadian regulations need improvement such as those pertaining to feed / water / rest intervals and loading density.

■ What We Proposed

In order to maintain transparency and allow ample time to respond, an advance notification to all Canadians was published, in April 2006, inviting comments on the existing regulations and areas that are being considered for

modification before a proposal is drafted and published in Canada Gazette, Part I. Information was sent out to organizations, groups and individuals representing the following sectors: Producers (or equivalent)Livestock Transporters or Forwarders, Processors, Federal and Provincial Governments, Animal Protection Organizations, Veterinarians/Veterinary Associations, Researchers, Livestock Specialists, Retail/Consumer Groups.

The following is a summary of the proposed changes.

1. Definitions

Clarify terms and provide additional detail.

2. Compromised and non-ambulatory animals

Provide more practical descriptions of the conditions that render compromised animals unfit for transport.

3. Feed, water and rest intervals

Consideration is given to define these intervals to better reflect animal needs related to water, food and rest.

4. Transport of animals at sea

Changes in ship construction and industry practices, such as the use of roll-on/roll-off ferries, need to be reflected in the regulations.

5. Segregation

Improve the current requirements.

6. Need for staff training

Adding such a requirement has the goal of increasing the likelihood for a positive transport outcome.

7. Loading density standards

Consideration is being given to capping the maximum number of animals that can be put on a given floor space (loading density) for certain species or classes of animals.

8. Consistency in enforcement

CFIA strives towards a Canada-wide consistent application of the regulations in its day-to-day inspection activities.

■ What You Told Us

A large number of participants submitted comments, despite the fact that the call for submissions constitutes informal, voluntary communication in advance of any regulatory process. Those arguments presented by respondents that addressed food safety, animal health and animal welfare support the continuing regulation of animal transport. The bandwidth of stakeholders that are either regulated by the Health of Animals Regulations, Part XII or have a significant interest in a positive outcome of animal movements throughout Canada is wide.

Most of the areas that CFIA had identified as being in need of modernization did not cause significant controversy amongst the respondents. These topics included updated definitions, sea transport, compromised animals and consistency in enforcement.

Perhaps predictably, topics such as the requirement to train staff that handle live animals and the idea of prescribing maximum loading densities prompted more diverse responses.

The most contentious issue was re-defining time periods animals – notably food animals - can be transported without feed, water and rest

As result of comments received, the CFIA is modifying the regulatory amendment to convert the prescriptive food water and rest intervals to outcome-based standards.

■ Challenges

Certain challenges to good transportation practices must be addressed, regardless of whether the current regulations or the proposed amendments are in force. CFIA inspection records show that even the minimum standards set out in the current regulations are regularly contravened. Per fiscal year, CFIA issues approximately 200 administrative penalties, with or without fines, for transportation-related contraventions. Evidence of non-compliance is not correlated with the activities of one single regulated party, a particular industry or a particular geographical area of Canada. Consistently lower levels of compliance and many undesirable transport outcomes occur with lower-value animals that are no longer useful for production.

One of the challenges we are facing includes the use of very large transport vehicles and stressed hogs.

The use of very large transport vehicles does increase efficiency. However, it does not equate to increased animal welfare. Quite to the contrary the use of large multilevel transports creates a twofold problem. It forces the hogs to navigate several ramps that often exceed the recommended angles for the species, resulting in an increase in animal injuries and stress. Secondly, it is difficult and unsafe for handlers to get in to the pens on the trailer (for lack of head room) and consequently hogs end up being unloaded with electric prodding from “outside” the trailer.

The arrival of stressed hogs at federally registered slaughter establishment is a growing concern. Studies have shown that transportation factors play a crucial role in the development of this condition. Studies also suggest that this condition can be prevented by taking care to reduce stress during transportation. In fact, a recent study conducted by the CFIA (unpublished) shows a statistical correlation between the use of these large pot bellied transports and the occurrence of stressed hogs (Table 1).

Table 1a. Use of Pot Loads for Trucking Pigs in Regions of Canada

	Atlantic	Quebec	Ontario	West
% of loads using pot trucks (n=1210)	16	43	87	60

Table 1b. Categorical Risk Factors of Pot Loads for Trucking Pigs

Categorical Risk Factors:	Odds Ratio:	Interpretation	95% Confidence Interval	P-value (Chi-square test)
% of pot loads with stressed hogs vs. other trucks (n=1210)	4.2	Tandem and Triaxle Pots are 4.2x more likely to be stressed	2.4, 7.5	<0.0001

Observations from CFIA study (unpublished) on use of Pot-bellied transport trucks vs. other truck types:

- Contained more hogs per load, spend more time on the truck and had a higher temperature (all statistically significant differences)
- Loading was 1.6 times (95% CI: 1.1, 2.4) as likely to rate as poor/fair in pot trucks compared to other forms of transport (P=0.024).
- 8.6 times (95% CI: 6.4, 11.5) as likely to use a prod as compared to other forms of transport (P<0.001).
- There was a tendency for hogs that loaded in pot trucks to have a warmer mid-truck temperature (P=0.054)
- No association between prod use and ease of loading (P>0.2).
- The number of hogs was not related to the ease with which the hogs loaded (P>0.2).

■ Conclusion

The resulting proposed regulations are based on clear and concise directions, which allow the regulated parties the flexibility to adapt to changing conditions and new technologies. A balance of performance based, goal based and prescriptive regulatory elements should allow for flexibility, good judgment and experience to achieve desirable transportation outcomes.

The Canadian Pork Council (CPC) is commended for taking a lead role in promoting national animal welfare expectations that are monitored from within industry. The CFIA encourages industry to lead animal welfare initiatives. Challenges will continue to be encountered and CFIA wants to continue working in collaboration with the Canadian pork industry to achieve our shared goals of improved animal welfare.

NOTE: an update on status of regulatory amendment will be given during the presentation in January 2008

■ Website for Update Information

<http://www.inspection.gc.ca/english/anima/heasan/transport/notavie.shtml>