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Dr. G. Doonan
Chief, Humane Transportation of Animals
Canadian Food Inspection Agency
59 Camelot Drive
Ottawa, Ontario K1A 0Y9

RE: Regulations Amending the Health of Animals Regulations

Dear Sir:

On behalf of Farm Sanctuary, and its 100,000 members, I wish to comment on the "Regulations Amending the Health of Animals Regulations" posted in the *Canada Gazette* on December 18, 2004 (Vol. 138, No. 51). Farm Sanctuary is the largest U.S. based non-profit organization dedicated to the rescue and protection of farm animals.

Farm Sanctuary strongly supports the proposed regulation to prohibit the transportation of non-ambulatory animals and commends the Canadian Food Inspection Agency for taking this action to protect the welfare of farmed animals in Canada. Banning the transport of non-ambulatory or "downed" animals will lessen animal suffering. Due to their size and weight, it is very difficult to move a downed cow humanely. Non-ambulatory animals are frequently subjected to unnecessary pain and distress during movement from one location to another. This mistreatment often results in injuries ranging from bruises and abrasions to broken bones and torn ligaments. Because downers are immobile, they cannot get to food and water. They may lie for hours or even days without having their most basic needs met, and many die of gross neglect.

Banning the transport of downers also protects public health. Epidemiological research has documented an increase in the prevalence of two foodborne pathogens – E. coli and Salmonella – among sick, downed animals versus healthy, ambulatory ones. The California Dairy Quality Assurance Program notes that the highest foodborne bacterial levels are found in cull cows getting ready to go to slaughter. The Program further notes that transportation increases the shedding of these pathogens in the manure of sick animals, and that other animals' hides may become contaminated by this manure, providing an important method of entry for pathogens into a slaughter plant. Therefore, to

reduce the risk of foodborne illness, the California Department of Food and Agriculture, as well as the USDA Food Safety and Inspection Service, recommend that sick cows not be sent to slaughter. Moreover, banning the transportation of non-ambulatory animals eliminates a potential bio-terrorism risk.

A number of U.S. agriculture industry groups, including the American Farm Bureau, the American Meat Institute, the National Cattlemen's Beef Association, the Milk and Dairy Beef Quality Assurance Center, and the National Pork Producers Council, have recommended that non-ambulatory animals be euthanized on the farm and not transported to market. Unfortunately, voluntary industry compliance has been ineffective in dealing with the problem of downed animals, both in the U.S. and Canada. More than ten years after initial media exposure of the problem, and after numerous warning calls from within the industry to "clean up its act," the problem – and the suffering of thousands of farm animals – continues. For example, the incidence of downer pigs arriving at slaughter plants in the U.S. has actually increased significantly since the National Pork Producers Council adopted a policy against marketing non-ambulatory animals.

As you are no doubt aware, regulating the transport of downed animals, such as requiring veterinary certification, is difficult to enforce. What constitutes "fitness for transport" may be interpreted differently by individual veterinarians and industry and government officials involved in the handling of farm animals. A clear prohibition against the practice, as proposed in the amended regulations, will allow for increased compliance by the industry and improved enforcement by government inspectors.

The animal agriculture industry appears to appreciate that downed animals represent a "black eye" it can ill afford. Many in the industry are not opposed to ending commerce in downers because they recognize that such a move would have only a minor economic impact. In studying the slaughter of non-ambulatory cattle in California, Dr. Pam Hullinger of the California Department of Food and Agriculture found that, on average, only \$28.70 profit was realized for each downed cow leaving the farm. Prohibiting the transportation of non-ambulatory animals provides an economic incentive for better animal handling. Dr. Temple Grandin, U.S. livestock expert, has observed that 5-10 percent of the dairies are responsible for 90-95 percent of downed dairy cows. This implies that a vast majority of downers are preventable. In fact, Dr. Grandin has estimated that 75 percent of all downed cattle could be prevented by good management.

Thank you for providing Farm Sanctuary with the opportunity to comment on this issue of great importance to our members. We look forward to learning that the regulation has been finalized as proposed.

Sincerely,

Gene Bauston, President
Farm Sanctuary