

Proposal for new animal transportation regulations under *The Health of Animals Act*

*Prepared by Animals' Angels and Canadian Coalition for Farm Animals
for the Canadian Food Inspection Agency*

Introduction

Virtually all animals raised for food in Canada are transported at least once during their lives, and often several times. Transportation can be a traumatic experience, especially for animals unfamiliar with previous transport experiences. It is one of the most stressful situations animals must endure, and can result in exhaustion, dehydration, injury, illness or even death.

Live transport is associated with a wide variety of stressors, including heat and cold, hunger, thirst, humidity, overcrowding, mixing with unfamiliar animals, fatigue, motion sickness, noise and vibration, and inadequate ventilation. Such stressors often result in poor welfare, a state in which the efficiency of the body defense systems including the immune system can be compromised.

Animals should not be transported if it can be avoided, and journeys should be as short as possible. Since the welfare of animals generally gets worse with the duration of the journey, Animals' Angels and Canadian Coalition for Farm Animals (CCFA) advocate short journeys. A carcass trade is recommended in place of long journeys.

Existing animal transportation regulations in Canada leave much to be desired. For example, ruminant animals may be transported 52 hours in Canada without water, food or rest. Mono-gastric animals may be transported 36 hours without water, food or rest. These standards allow long, arduous journeys for animals.

Fortunately, Canadian Food Inspection Agency officials recognize the inadequacies of existing regulations, and are in the process of revising the standards. **The purpose of this paper is to provide input to that process, toward attaining the best possible transport standards for Canada, with a focus on the well-being and health of animals as well as sanitation and control of the spread of disease.** The proposals for regulatory changes are based on science and experiences on the road, plus suggestions from the police and animal transport companies.

Although the focus of this paper is animal transport regulations, CCFA and Animals Angels would like the reader to consider other issues. Enforcement of animal transport standards in Canada is currently inadequate, the result of insufficient resources and a seeming lack of commitment. Though Canada is the second largest country in the world, there are only 60 official blitz highway inspections of animal transportation conducted annually by the Canadian Food Inspection Agency.

Due to lack of adequate inspections and enforcement, there is little available data about accidents, infractions and imposed penalties. Despite lack of data, violations of animal transport standards evidently occur regularly, as shown by surveillance of animal transport vehicles in Canada by Animals' Angels. Their inspectors trailed randomly-selected vehicles on long-distance journeys across Canada and the United States, including Hawaii. Their findings provide evidence of violations of allowable driving times, dirty vehicles and rough handling of animals during loading, unloading and upon arrival at slaughter plants.

Another problem facing Canadian animals is the loss of Canadian jurisdiction when they leave the country, leaving animals at the mercy of countries which do not have animal transportation standards or inspections. This is not acceptable. Since Canada and the USA are important trading partners in live animals, CFIA and the USDA need to meet to develop international standards protecting the animals that are transported across their common border.

Note: Canadian Coalition for Farm Animals and Animals' Angels recognize the transportation code of practice as a useful resource, though not always agreeing with its recommendations. Its voluntary status renders it a less effective tool than if it were regulated.

Below are **recommended standards** advocated by Canadian Coalition for Farm Animals and Animals' Angels for inclusion in the revised animal transport regulations, Section XII, Regulations under the *Health of Animals Act*.

1. Maximum transport journey times from a farm for further fattening or reproduction

(ALL animals must have had access to feed within 5 hours of transport and to water up until the very point of loading- this pertains to private farms as well as markets and all other points of loading animals for transport. To prevent colic in horses one can LIMIT the amount of water provided to the horses before transport to just several liters, but water must still be offered)

Ruminants: maximum 24 hours.

Mono-gastric(except for poultry and rabbits): maximum 16 hours (Stull)

Poultry and rabbits: 12 hours

After this, all animals must either arrive at their point of destination or must be fed and watered and rested for 18 hours minimum at an approved staging point before continuing on a second and FINAL phase of transport.

Except:

Animals (namely cattle) in lactation: maximum 12 hours and then must be immediately milked at point of destination.

Calves, piglets and other still-suckling young: maximum 6 hours and then must arrive at final point of destination.

When weaning coincides with transportation, the journey is more difficult for the animals. Shipping fever is a common cause of morbidity and death among calves following transportation, particularly in beef calves transported to feedlots in North America. (Eurogroup)

Young animals that are still suckling should never be transported more than six hours because they need milk and it is impossible to care for them properly on-board a truck. Young calves, less than four weeks of age, are not well adapted to cope with transport and marketing, and often suffer high mortality rates. The younger the calves, the higher the mortality. (Eurogroup) Animals should never be transported longer than these maximums because research shows it is at this point animals start having muscle fatigue, dehydration and the trailer accumulates higher ammonia

levels. The presence of straw or litter bedding also increases ammonia levels (Stull). The solution is not to transport animals without bedding, but to restrict transport times so the ammonia level in the bedding does not reach critical levels.

During extreme temperatures, animals suffer. They must use more energy to sweat or keep warm, and thus are more quickly prone to exhaustion and collapse. Thus, we strongly recommend the above maximum journey times because longer journeys cause a dramatic decrease in animal welfare.

2. Maximum transport journey times for culled animals destined for slaughter.

(ALL animals must have had access to feed within 5 hours of transport and to water up until the very point of loading- this pertains to private farms as well as markets and all other points of loading animals for transport. To prevent colic in horses, water can be LIMITED to just several liters right before loading)

Ruminants: 8 hours

Mono-gastric (including poultry and rabbits): 8 hours

Calves, piglets and other still-suckling young: 6 hours

3. Maximum transport journey times to and from a livestock auction

(ALL animals must have had access to feed within 5 hours of transport and to water up until the very point of loading- this pertains to private farms as well as markets and all other points of loading animals for transport. To prevent colic in horses one can LIMIT amount of water offered right before loading).

Ruminants: decrease maximum allowed transport time by 6 hours

(Culled ruminants in a weak state should NOT be brought to an auction as the chance of them surviving the trip without suffering is low).

Eg. If a cow is culled and the destination is undoubtedly the slaughterhouse but the owner wants to first ship her to market, she can only be transported 2 hours to a market and after being sold transported again 2 hours.

All mono-gastric species: decrease maximum allowed transport time by 6 hours

(Culled mono-gastric animals in a weak state should NOT be brought to an auction as the chance of them surviving the trip without suffering is low).

Eg. If a good quality sturdy feeder steer is brought to market to go for further fattening, he can be shipped 18 hours to the market and after being sold another 18 hours, provided that the market first feeds and waters the animals before being reloaded.

Animals in lactation: these animals should not be brought to a livestock auction.

Calves, piglets and other still-suckling young: these animals should not be brought to a livestock auction.

If the animals come from a market or are going to a market, the normal maximum journey times should be decreased since they will spend many hours without water and food, and in a stressful environment at the market.. Because animals in lactation need to be milked at least every 12 hours, and suckling young need milk, these animals should never be brought to a livestock auction. Auctions are not set up to adequately care for them, or assure they are in a state to endure further transport.

Animals should not be transported from market to market. An animal should visit a market only once before being sent to slaughter or for further fattening. Animals' Angels has observed animals being moved from one market to the next in Ontario. This is done to make a small profit, but it does not justify the suffering caused to the animals.

4. Staging points (food and water stations)

The purpose of staging points is to provide a safe and comfortable environment for animals to be unloaded and rested during journeys longer than the legal maximum time. They are also a place to unload animals that have become sick or injured during the journey and are in need of veterinary care, rest, or to be humanely killed. **Facilities should be CFIA-approved and inspected. This includes staging points where Canadian animals are rested en route in a foreign country. This includes facilities such as, for example, Pacific Livestock Ranch in California, where Alberta pigs are rested.**

-Staging points are to be used only once during long distance transport. Therefore animals can be transported during the maximum transport time, rested at a staging point and then continue for a second phase of maximum journey time but at the end of the second phase of transport the animals must arrive at their point of destination.

-Staging points are to consist of a building with clean, well ventilated pens. This includes ample litter on the floor to assure the comfort of the animals. There must be enough room for animals to stretch and walk around easily. There must be permanent access to water. The building must be equipped with automatic ventilators and heaters to protect animals from adverse climatic effects. Old ship containers are NOT suitable to be used as a resting station, nor are railway carriers, trailers and so on.

-There must be at least three official staging points per province (except PEI) that are routinely inspected by CFIA inspectors.

-The person responsible for the staging point must sign the transport plan papers (discussed below), confirming the animals were indeed unloaded, watered, fed and rested for the required time.

-A livestock market may ask to become a registered staging point, but must prove it satisfies all the requirements of a staging point, and is prepared to sign legal documents. To guarantee their environment is calm and with low noise, resting animals in transit must be kept in a separate area from the auction and animals being sold.

5. Fitness for travel

-Young suckling animals should NEVER be transported to market, but only to a slaughterhouse or a fattening farm.

- Animals in lactation should NEVER be transported to a market; they must first be dried up before going to market.

At markets, cows in lactation cannot be milked, and even when market authorities say they have the capability, Animals' Angels has NEVER seen it occur or the equipment used. It is completely impractical and will not be respected in practice if allowed. Having full udders causes pain to cows, and cows sometimes spend hours and even days at a market. Once on the truck it is impossible to prove how long they have been at a market and therefore how long since their last milking. Therefore it is impossible to enforce a rule.

-Female animals within the last 10% of their pregnancy cannot be transported.

Transport of pregnant animals remains a huge problem because it is often difficult to predict whether an animal is likely to give birth during the journey. Sometimes it is difficult to determine whether an animal is even pregnant (for example, unshorn sheep). The regulations must be specific and practical to enforce and respect. Ideally, pregnant animals would be accompanied with a certificate stating the date of impregnation. However, this is only possible for cattle and horses. Most other animals breed naturally in the pasture and the date of impregnation is not known. Animals within the final 10% of pregnancy should not be transported.

-An animal with a high-centre of gravity (horses, cattle, bison, ostriches) which cannot put full pressure on all legs is not apt for transport and must either be treated or humanely killed.

-An animal of low center of gravity (pigs, sheep, chickens, rabbits etc...) that has an injury (including a light case of foot rot, arthritis, swollen joints, torn muscles etc.) which would cause pain if rubbed against other animals or the ramp or sides of the truck, cannot go on a long distance journey, but instead to the nearest slaughterhouse which must be under 150 km. In the case where there is no slaughterhouse within 150 km, the animal must be humanely killed on site.

-Non-ambulatory animals or an animal with a broken leg cannot be transported.

It is not possible to assure good animal welfare during transport if the animal is unfit, lame or weak, Emaciated animals (e.g., cull dairy cows) are not fit for transport. (Grandin)

-Very young animals cannot be transported.

The exact age largely depends on the species, for example chicks can be transported at hatching, but calves should be a minimum of 14 days of age, and pigs 50 days of age, etc.

6. Training and training certificate regulations/driving issues

-MANDATORY training on humane animal handling, easy loading techniques and animal transport legislation is required for all livestock drivers.

-Truck drivers must have a certificate of competence with them at all times to prove they have successfully passed the training course.

- Education programs may be industry-led with approval by CFIA, but exams are to be independent of industry.

-Driver certification can be withdrawn, as well as that of transporters, on evidence of infringement of standards.

-Both the transport company and the driver are responsible for the animals' welfare during transport and loading/unloading.

Animal welfare can be greatly improved through education of persons involved in handling or moving animals, loading and unloading animals, driving animal-transport vehicles, auction market and feedlot personnel, producers, and persons responsible for assessing animals as fit for transport.

A procedures manual on handling and hauling livestock is necessary, to be developed by the federal government or industry. This would include information on provincial and federal transportation legislation, handling cull animals, allowable journey times, appropriate driving speeds, good driving practices (such as cornering, careful braking, and conditions for vulnerable animals), and border-crossing information.

Payment to drivers which encourages rapid handling and fast driving usually results in poor animal welfare. Insurance against mortality during journeys or against downgrading of carcasses should not be permitted.

7. License and authorization of vehicles/transport company obligations

-All livestock trucks must be licensed, which includes demonstrating the trailer or truck is fit for transporting animals in a safe and comfortable manner. Renewal will be every two years.

-For all transport longer than 12 hours, two drivers are mandatory. *Animal transport journeys are made even longer when the driver stops to sleep. Animals should be transported without unnecessary delays to their destination. Therefore two drivers are mandatory. As well, two drivers are better able to respond to an emergency or problem.*

-Drivers MUST respect their resting and working hours. Log books are not fool proof; taco graphs must instead be used.

8. Required documentation

-For all transport journeys greater than 500km, an official veterinarian must be present AT THE TIME OF LOADING. The veterinarian is to sign the sanitation papers confirming the animal-transport truck is in acceptable condition, it meets regulatory requirements, and the animals are all fit for transport. The veterinarian must also sign the transport plan and ensure the chosen staging point is CFIA-inspected and registered. The veterinarian signing papers at point-of-loading must confirm Canadian animal transport regulations will protect the animals during the ENTIRE planned voyage, including the route in a foreign country.

-For all journeys there must be a transport plan and manifest. The point of origin and destination, as well as departure and estimated arrival times are required on the transport plan. Also included are the planned resting break at a staging point (should the length of journey require one), and type and number of animals on board. Should the journey be 500 km or longer, the veterinarian who inspected the loading of the animals and approved the vehicle must also approve and sign the transport plan.

-Information from the manifests is to be compiled and entered into a computerized database which permits tracing animal movements and sales. This includes ownership, when the animals were bought and sold, where the animals originated and their movements.

-Assurance of the provision of this information will be enforced by CFIA.

9. Physical requirements of vehicle

-All livestock trucks must be equipped with a tacho graph to better control driving times and to ensure the driver's resting breaks and staging-point breaks for the animals are respected.

-Dividers must be in place to create compartments for small numbers of animals, preventing trampling, fighting etc. These dividers must be solid from the truck floor to the height of the animal to prevent a fallen animal getting his or her legs caught under the divider, and to prevent an animal from attempting to climb over the divider.

-Horses cannot be transported in two-tiered trailers, as research shows the percentage of injured horses was greater for two-tiered pot-belly trailers compared with straight deck trailers. (*Stull*)

-The back door of trailers transporting horses must be the full width of the trailer to prevent horses becoming trapped while rushing out. Research shows trailers with loading doors only one-third the width of the trailer cause injuries to horses (also observed in pigs). Animals should be unloaded in a calm manner without being rushed. This also reduces injuries when the animals squeeze through narrow unloading doors.

-A fixed means of lighting should be provided inside the vehicle.

-A thermometer must be installed in the trailer so the driver can easily monitor the inside temperature. Pigs should never be in conditions over 30 C, for example, and baby pigs never less than 20 C. The driver is responsible for checking and regulating the temperature inside the livestock trailer.

-Trucks are to be equipped with automatic ventilation systems.

In the EU, ventilation systems have been shown to prevent ammonia levels and temperatures from becoming too high. The ventilation system must be turned on whenever the truck is stationary (e.g., during heavy traffic or when drivers stop to eat). The ventilation system must be designed and maintained so there is no possibility the animals get hurt.

Pigs have a poor thermo-regulatory ability and many pig deaths during transport are due to heat. High temperatures combined with humidity can be fatal. Temperature and ventilation inside vehicles must therefore be carefully controlled, especially in hot weather. (Eurogroup)

-Every truck is to be equipped with emergency water troughs that can easily be attached to the sides of the trailer and filled with water in case the animals become over-heated or dehydrated due to an unforeseen emergency (traffic jam, truck break-down, broken ventilation system etc.). These water troughs must be designed according to the species on board (horses need larger troughs than, for example, sheep or pigs) and there must be enough to properly water ALL animals on board.

-No matter the journey distance, all trucks must have a layer of bedding thick enough to absorb urine and manure during the entire journey.

Bedding is important because it provides animals with a comfortable material to lie on, as well protect animals during cold weather.

-Minimum height of 20cm above the withers of the tallest animal is absolutely necessary.

(Broom) *If not, severe bruising occurs, as seen on carcasses in slaughter plants.*

-Ensure minimum height of cages for hens, chickens and turkey and rabbits so all animals can stand upright in a comfortable and natural position.

-Ensure easy driver-access to animals aboard trucks.

Emergency doors along the sides of trailers are necessary to check on the animals in the front compartment, or to unload an injured animal.

-Specify maximum inclination of ramps.

Ramps must provide good gripping so animals do not slip or become frightened during loading. The provision of straw on ramps eases the loading process. The ramps must be equipped with foldable side panels to prevent animals from falling off the ramp during loading and unloading.

-Ensure ALL animals are protected from cold weather and developing frost bite.

In the winter months animals have arrived with severe cases of frost bite on their ears, nose etc...

Pigs are particularly vulnerable. There must be an adequate number of slats on the side of the trucks to limit the amount of cold wind coming through but without causing poor air quality inside the truck.

Extra bedding, particularly on the parameters of the inside flooring of the truck must be provided. In the winter time, there must be enough bedding that once an animal lies down, the bedding pops up around its body.

10. Loading density and loading conditions

Precise loading densities are to be created.

Animals' Angels recommends density figures similar to the EU, but with added space for sheep, cattle and horses. Many official veterinarians say the EU figures are still too dense, so Canada should offer slightly more space than the EU, both for the animals and the interest of industry.

In the summer months, pigs must also receive adequate space to enable them to control their body temperature (enough space to lie out flat on side without being touched by others).

*As a general principle, the more space per animal the better, as long as the driving is good.
(Eurogroup)*

Contrary to public perception, studies have shown falls are rarely observed in low stocking densities, but are more frequent when stocking density was high. Falls are often triggered by driving events and by animals struggling to change position. After falling, cattle were unable to get up again. Fallen animals are trampled and this causes other animals to lose their footing. (Eurogroup)

-Lower density levels are required during hot summer months, (e.g., 15% additional space when temperature outside is above 25 C).

There must also be a difference in density between wool and shorn sheep (in Germany +5% space allowance is required if the fleece is more than two cm).

-Dividers must be in place at all times to create smaller groups of animals and prevent trampling.

Recommended maximum group size of one horse (except in the case of young horses raised together, max. five/group), eight adult cattle, 15 calves, 15 slaughter pigs or young sows, 32 piglets, 32 sheep or goats. The creation of small groups also prevents more aggressive or hyper individuals from disturbing others on the truck.

-Electric prods are absolutely forbidden.

The heart rate of pigs rises with rough handling and use of harmful handling aids such as sticks. Electric goads cause distress and panic rather than facilitating movement. (Eurogroup, Gonyou)

-No hitting on face, private areas, udder, hip bones, vertebrae or legs during loading.

Transportation of cattle results in bruising caused by rough handling and poor driving, and is exacerbated by high stocking densities, long journey times and repeated loading and unloading. Use of a stick for driving cattle increases bruising. (Eurogroup)

11. Enforcement of regulations

-An increase in person power is necessary to properly enforce standards for animal transport, and at sales barns and auctions in Canada. Enforcement includes assurance of driver certificates, registration of transporters, hours of driving, condition of trucks, manifests and post-journey follow-up (including logs and numbers of animals arriving dead or unfit).

-Improved reporting and documentation of animal mistreatment is needed across Canada. Strict enforcement of the AMPS system is needed, to include statistics made public via the Internet. Prosecutions should be undertaken by CFIA for serious or repeat infractions.

-Livestock trucks require priority at border crossings (either via special lane or escort to the front) and through construction areas and other road bottlenecks.

-Better communication is needed among international enforcement agencies, especially the U.S. Customs and Border Protection Service and the U.S. Department of Agriculture.

-A best-practices document for cross-border animal transport is needed. The Animals' Angels brochure provides a useful guide for U.S.-Canada border information.

-Truckers are still overloading for American weights and having to shift their load at the border when using a push axle. (Alberta transport report)

-A means to gain legal access to U.S.-bound sealed trailers is needed in case of a downed animal.

-CFIA veterinarians need authority to euthanize animals in distress at the border, or order it be carried out.

-Penalties for infractions should be specified in the regulations.

-Animal transportation standards need to be harmonized between the provinces and federal jurisdictions, as well as between Canada and the USA. Canadian animals must be protected by Canadian animal transport regulations during their entire voyage, not just on Canadian soil. (See Animals' Angels investigation of Alberta pigs to Hawaii 2004, or Alberta pigs to Jim's Farm Meat Slaughterhouse in Atwater, California 2003).

-Ideally, CFIA will involve the RCMP, provincial police and SPCA officers in enforcement duties to ensure more comprehensive oversight of animal transport, markets and auctions barns.

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