



CANADIAN VETERINARY
MEDICAL ASSOCIATION
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April 21, 2017.

Richard Arsenault
Executive Director
Domestic Food Safety Systems and Meat Hygiene Directorate
Canadian Food Inspection Agency
1400 Merivale Road, Tower 1
Ottawa, Ontario, K1A 0Y9

Re: Proposed Safe Food for Canadians Regulations
Canada Gazette Vol. 151, No. 3 — January 21, 2017

Dear Dr. Arsenault,

The Canadian Veterinary Medical Association (CVMA) is the national and international voice for Canada's veterinarians. The CVMA facilitates the development of unified viewpoints on issues for which the veterinary profession advocates and in which it believes. CVMA is comprised of over 5500 licensed veterinarians working in all of Canada's provinces and territories as private, general, and specialist practitioners, researchers, educators and public servants. Veterinarians provide unique expertise in regards to the health and welfare of all animals including food-producing animals (livestock, poultry, and aquaculture), equine, zoo, laboratory and companion animals, among others.

A priority for Canadian veterinarians includes promotion and support of the health and welfare of animals which in turn underpins a safe and secure food supply, public health, and a strong economy by facilitating international trade in animals and animal products. The CVMA membership comprises Canada's national veterinary voice and a source of authoritative expertise on veterinary science, animal health and welfare, and veterinary public health.

Established by an Act of Parliament in 1948, the CVMA remains a leading advocate for animal welfare in Canada, through actively advocating for and promoting the humane raising, handling and transportation of animals, developing relevant position statements on, for example, animal abuse and humane slaughter and contributing to the Scientific and Code of Practice Development committees of the National Farm Animal Care Council (NFAACC).

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With regard to the proposed Safe Food for Canadians Regulations, the CVMA is pleased that the CFIA is aiming to strengthen Canada's reputation as a leader in food safety by establishing consistent, prevention-focused requirements for food. Given the CVMA priorities in the area animal health and welfare and the maintenance of a safe food supply, the Association is pleased to see in the proposed regulations the prominent role played by veterinarians in providing professional oversight for meat hygiene including humane treatment, handling and slaughter of animals and inspection of meat products. Nevertheless the CVMA has specific suggestions as follows:

1. References to “avoidable suffering” and “avoidable injury” (Sections 127 and 129 (2) and 129 (3) and elsewhere) should be replaced with “suffering” and “injury” to be consistent with the proposed Humane Transport Regulations and to reduce ambiguity.

Section 127. CVMA suggests adding the following wording:

“A licence holder must ensure that—

- (a) care is taken not to frighten, excite or mistreat an animal;
- (b) no animal is overturned;
- (c) no animal is taken to the place of killing unless it can be killed without delay;
- (d) no animal is led or driven over ground or floor, the nature or condition of which is likely to cause the animal to slip or fall.”

2. “Suffering” should be defined. CVMA suggests that “suffering” be defined as follows: “Suffering describes a condition where an animal perceives pain or some other negative affect that is prolonged. Suffering can be associated with both physical and emotional disorders.”

3. The wording in Section 128 (1) allows for an exception under Section 140 suggesting that somehow hitting an animal with a whip or prod would be acceptable during stunning. Clarification of this wording is advised. CVMA suggests adding the following wording: “Prods and other aids should not be used repeatedly if the animal fails to respond or move.”

4. The reference to the use of electric prod 128(2) should have some reference to the level of use (e.g. its use should not result in suffering).

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5. The use of the word “death” in Section 129 (2) and elsewhere might lead to confusion given that animals are “slaughtered” and hence die. Definitions of both words would be useful.

6. Regarding Section 132, the CVMA suggests that the title “Overcrowding” be replaced with:

“Lairages” and the following text replace the existing text:

“132 A licence holder must:

- a. provide a food animal with sufficient space to avoid the suffering, injury or death of the animal;
- b. provide a food animal with sufficient ventilation to avoid the suffering, injury or death of the animal;
- c. provide a sufficient number of pens at the slaughterhouse for adequate lairaging of the animals with protection from the effects of adverse weather conditions; and
- d. provide adequate ventilation to ensure that temperature, air relative humidity and ammonia levels are kept within limits that are not harmful to an animal, taking into account the extremes of temperature and humidity which may be expected; and ensure that racks, mangers or other equipment are adequate in number and size for the feeding of animals confined in the lairage, fixed where practicable, and constructed and placed so that they are easily accessible to the animals, can readily be filled and cannot readily be fouled.”

7. Regarding Section 134 (Handling), the CVMA suggests that 2 new subsections be added as follows:

“(3) A licence holder must ensure that —

- (a) it has suitable equipment and facilities available for the purpose of unloading animals from means of transport;
- (b) there are no sharp edges or protrusions with which an animal may come into contact;
- (c) the place of killing is sited in such a way as to minimise handling of the animal at any time up to the point of killing;



(d) any instrument, restraining equipment, other equipment or installation which is used for stunning or killing is designed, constructed and maintained so as to facilitate rapid and effective stunning or killing; and

(e) any defect found in back-up stunning or killing equipment is rectified forthwith.

(4) For animals delivered other than in containers a licence holder must ensure that:

(a) equipment for unloading animals delivered other than in containers is of a suitable height and design for that purpose, has non-slip flooring and, if necessary, is provided with lateral protection; and

(b) exit and entry ramps have the minimum possible incline.”

8. Regarding Section 135 (1) the CVMA suggest that the text be modified to read:

“Water and feed

135 (1) A licence holder must provide a food animal — other than a food animal that is confined in a crate — that is unloaded from a conveyance at an establishment with

- (a) water or another source of hydration as soon as it is unloaded and at all times to animals in lairages unless they are to be slaughtered without delay; and
- (b) feed, within 12 hours after it is unloaded. If animals are not to be slaughtered within this period, suitable feed should be available to the animals on arrival and at intervals appropriate to the species. “

9. Regarding Section 140 the CVMA suggests that the existing text should be modified to read:

“Slaughtering and Dressing

Persons carrying out stunning and/or bleeding must be properly trained and competent

Requirement before bleeding

140 Before bleeding a food animal, other than a game animal, a licence holder must use one of the following methods either to render it unconscious in a manner that prevents it from regaining consciousness before death or to slaughter it:



- (a) deliver a blow to the head with a mechanical device in a manner that causes an immediate loss of consciousness;
- (b) apply an electrical current in a manner that causes an immediate loss of consciousness; or
- (c) expose it to a gas or a gas mixture in a manner that causes a rapid loss of consciousness;
- (d) ensure that it is restrained in an appropriate manner;
- (f) backup stunning devices must be available for immediate use if the primary method of stunning fails.

Requirement for bleeding

A person engaged in the bleeding of an animal which has only been stunned must ensure that the animal is bled without delay after it has been stunned.

A person engaged in the bleeding of an animal which has only been stunned must ensure that the bleeding is—

- (a) rapid, profuse and complete; and
- (b) completed before the animal regains consciousness.

If an animal is bled after stunning, no person may cause or permit any further dressing procedure or any electrical stimulation to be performed on the animal before the bleeding has ended and in any event not before the expiry of—

- (a) in the case of a turkey or goose, a period of not less than 2 minutes;
- (b) in the case of any other bird, a period of not less than 90 seconds;
- (c) in the case of bovine animals, a period of not less than 30 seconds; or
- (d) in the case of sheep, goats, pigs and deer, a period of not less than 20 seconds.”

10. Regarding Section 143 (Ritual Slaughter), the CVMA suggests that the text be modified to read:

“Ritual slaughter

143 Despite section 140, a licence holder who ritually slaughters a food animal with the intent of complying with Judaic or Islamic law must:

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- (a) restrain the food animal;
- (b) administer one continuous cut of not more than one back-and-forth movement of a knife, without it being lifted off the food animal, resulting in the rapid, simultaneous and complete severance of the jugular veins and carotid arteries, in a manner that causes the animal to bleed immediately; and
- (c) rapidly and completely bleed it, to render it unconscious in a manner that prevents it from regaining consciousness before death.
- (d) immediately before killing, inspect the knife to be used to ensure it is undamaged and of sufficient size and sharpness to kill the animal
- (e) if killing a sheep, goat or bovine animal by ritual slaughter without prior stunning must ensure that:
 - (i) the animal is not placed in restraining equipment unless the person who is to carry out the killing is ready to make the incision immediately after it is placed in the equipment; and
 - (ii) appropriate back-up stunning equipment is kept close to the restraining equipment for use in case of emergency and is immediately used where it is subjected to any avoidable pain, suffering or agitation or has any injuries or contusions.
 - (iii) it is not shackled, hoisted or moved in any way until it is unconscious and in any event not before the expiry of—
 - (a) in the case of a sheep or a goat, a period of not less than 20 seconds;
 - and
 - (b) in the case of a bovine animal, a period of not less than 30 seconds,
- (f) If killing of a bird by ritual slaughter without prior stunning must ensure that no further dressing procedure or any electrical stimulation is performed on the bird if it presents any signs of life and in any event not before the expiry of—
 - (a) in the case of a turkey or goose, a period of not less than 2 minutes; and
 - (b) in the case of any other bird, a period of not less than 90 seconds”

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11. Regarding Section 143, the CVMA has recently (2016) completed a position statement on the Humane Slaughter of Animals that expresses the Association's opposition to slaughter without stunning (e.g. as may occur during ritual slaughter). The full text of the position statement is attached for your reference. The position itself reads as follows:

"The Canadian Veterinary Medical Association (CVMA) holds that, when farmed animals are killed for food, the methods employed must minimize fear, anxiety, pain, distress and suffering, and they must result in immediate and confirmed death or rapid loss of consciousness that persists until the time of death. Though slaughter-without-stunning is currently allowed in Canada under certain circumstances, the CVMA is opposed to the practice as it causes avoidable pain."

12. Regarding Section 158, the purpose of the post-mortem examination program should be clearly stated. It should be clear that it is not ever intended to replace veterinary inspection of products intended for human consumption.

In closing the CVMA wishes to express its appreciation for having the opportunity to provide feedback on the proposed Safe Food for Canadians Regulations. It urges the CFIA to continue to support the important role that veterinarians play in safeguarding animal health and welfare, public health and a safe food supply through implementation of effective policies and regulations and ongoing training and professional development.

Sincerely,

Troy Bourque, DVM
CVMA President

Enclosures: CVMA Position Statement on Humane Slaughter of Animals

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