



Canadian Veterinary
Medical Association
Association canadienne
des médecins vétérinaires

April 4, 2024

Standing Committee on Agriculture and Agri-Food (SCAAF)
Sixth Floor, 131 Queen Street
House of Commons
Ottawa ON K1A 0A6
Canada

For the Attention of:

MP Kody Blois, Chair - Kody.Blois@parl.gc.ca
MP John Barlow, Vice-Chair - john.barlow@parl.gc.ca
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Re: Submission from the Canadian Veterinary Medical Association (CVMA) regarding Bill C-355: An Act to prohibit the export by air of horses for slaughter and to make related amendments to certain Acts.

Dear Standing Committee on Agriculture and Agri-Food Committee members,

Please accept this submission from the Canadian Veterinary Medical Association (CVMA) regarding Bill C-355: An Act to prohibit the export by air of horses for slaughter and to make related amendments to certain Acts.

The market for horse meat exists in Canada as it does in many other countries. While many citizens find this distressing, the consumption of horse meat is common across many cultures and is likely to continue for the foreseeable future. The CVMA recognizes the Canadian public may have strong opinions on this practice. Horses have historically enjoyed a high level of regard by Canadian society, largely due to their participation in various human endeavours and by the human-animal bonds thus formed. That bond acknowledged, the CVMA takes the position that all animals, irrespective of species or status, have similar needs regarding a good life from birth to death. As animal health professionals, we review all animal health and welfare issues by focusing on evidence-based criteria without species or animal use bias.

The issue that is the focus of this Bill is a concern by some animal advocacy groups that the live transport of young adult horses destined for an Asian market are transported by air in an inhumane manner. The CVMA reviewed the issue to determine our position based on the evidence.

Following an evidence-based review, and consultation with subject matter experts and experienced observers of the entire farm to market process, it is the view of the CVMA that these horses have a good quality of life on the farms of origin. Horses purpose-bred for this market are bred and raised naturally in a herd environment and are provided with all the essentials for a good life.



They have the opportunity to experience the five freedoms of animal welfare, namely: proper nutrition, good physical and natural environment, good health, allowance for species specific behaviours and interactions with others in the herd, as well as a positive mental state with freedom from anxiety. Regarding the transport in question, it was determined that these animals did not experience worse welfare or outcomes than other food animals and in fact, the available data suggests better outcomes in general.

With respect to all modes of transport, the federal *Health of Animals Regulations* (HAR) amendments to Part XII Transport of Animals were updated and enacted in February 2020. These amended regulations have several added protections for the horses in question, including floor and head space requirements and strict container requirements, as per the International Air Transport Association's Live Animal Regulations (IATA LAR) – the global standard on best practices regarding air transport of animals. Additionally, the feed, water, and rest deprivation maximum intervals have been reduced, and some overriding animal outcomes-based requirements have been added. There are also requirements for adequate ventilation, protection from noxious substances, frequent monitoring, and reporting of any incidents leading to harm, injury or death to inform corrective and future actions.

Inadequate head space resulting in ear contact with overhead netting, is often referred to as an indication of inappropriate crating by some advocacy groups and individuals. This can indeed occur but typically as incidental ear contact subject to horse repositioning. The head space provided in crates is similar to that offered during road transport by trailer.

The lack of segregation of animals was raised as a cause for concern by some advocacy groups; however, given that these are group-raised herd animals, equine and animal transport subject matter expert observers have indicated that they are calmer, and their welfare better ensured when crated in small familiar and compatible groups. The crate type and the acceptable density for the intended transport was included in a recent update to the IATA LAR and after review by subject matter experts, determined to be acceptable for the given species, size and their nature.

Canada has high standards for the on-farm care of horses mandated by provincial legislations and the National Farm Animal Care Council Equine Code of Practice. Transport related protections are embedded in the federal *Health of Animals Regulations* Part XII. As such, Canada is one of the countries where animals destined for the export market can have a good life on farm and receive the necessary care and protections during transport. While the current transport related provisions are acceptable and certainly superior to the previous animal transport regulations, the CVMA suggests that the Government of Canada continue to seek improvements and support innovations to this and to all food animal transports in collaboration with widely acknowledged species experts.

Regarding the current proposed Bill C-355, the CVMA is cognisant of and is concerned that the potential for disruptions to the current supply of Canadian horses for this market could lead to unintended negative consequences. These include the significantly decreased value of high value horses currently in the supply chain and the concomitant potential decrease in incentivized high welfare standards. As well, animal welfare would be at risk due to the current lack of slaughter capacity to process the horses and the resultant uncertain final disposition of these animals. Further, the cessation of this market in Canada could result in the sourcing of horses from countries where on-farm welfare and transportation are not prioritized and, as such, could lead to significant harms for horses there. Concerns have also been raised regarding the current wording of the proposed Bill which could lead to consequential delays and added welfare concerns for horses being transported for any purpose, as review of documentation to ensure compliance with this new requirement would be added to the already time sensitive process of transporting horses for any purpose.



The CVMA holds that food animals be treated humanely throughout their lives from birth to death, including during transport. Time spent being transported should be as short as possible for the intended use and regulatory requirements must be met. The welfare of animals being transported must be prioritized by all stakeholders involved, as must their care before transport and after reaching destination. Based on an evidence-based review, it is the position of the CVMA that the horses transported for this market are not at any greater welfare risk than any other transported animals and, in fact, there may be a higher standard of care overall, due to their high value. This does not imply that there is no room to improve and the CVMA supports improvements to the current transport process. However, the information provided must be balanced and fact-based in order for the public to fully understand the actual versus any perceived or suspected risks based on emotion and limited information. While the material and testimony submitted by animal and horse advocacy groups presents a compelling narrative, the CVMA is of the opinion that the information on which to base regulatory change must include evidence-based information without species bias.

All modes of transport including air, road, sea, and rail present certain risks to the animals being transported. These risks can be mitigated with adequate planning and scheduling, the development of appropriate contingency plans, proper animal preparation and conditioning, the provision of good care and humane handling practices, selection of staff with the appropriate competencies and training, frequent monitoring of the animals, meaningful data collection and the review of and timely response to that data. The CVMA holds that, while there is no immediate welfare risk to these horses, improvements to the existing transport process as well as publicly funded support for animal transport related research and innovations will improve animal welfare in this and all food animal transports. In order to address potential risks, the CVMA encourages the Canadian Food Inspection Agency (CFIA), the regulatory authority for the transport of animals, to dedicate the resources needed to ensure adequate inspection and enforcement of all regulatory requirements to mitigate animal transport welfare related issues at origin, during transport and at destination.

If the Committee determines that the Bill should be moved to the next step in the regulatory process, despite the evidence presented in this submission, the CVMA would strongly recommend that a long transition and coming into force period be included. Horses have a long gestation period, and many are likely in varying stages of pregnancy at any time. Animals intended for the Asian market are currently being raised on farm and the time to market weight is calculated in years. The disposition of these animals to ensure their welfare would need to be fully considered. As well, sufficient time would be needed to address infrastructure deficiencies related to current minimal slaughter capacity versus the number of horses that would be added to the already challenging numbers currently being slaughtered in Canada from domestic sources as well as foreign imports.

To conclude, the CVMA does not support Bill C-355 as written, as the current transport conditions do not, in our opinion, lead to noteworthy animal welfare concerns. The Bill would lead to unintended negative animal welfare consequences that have not been fully considered. CVMA supports continued research, improvements and innovations in all areas related to food animal transport.

Sincerely,



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President, CVMA



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