

Clean Environment Commission Hog Production Industry Review

A Final Note on Animal Welfare

By Syd Baumel, AnimalWatch Manitoba

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Mr. Terry Sargeant, Chair
Mr. Wayne Motherall
Mr. Edwin Yee

Dear Sirs:

Now that you, Mr. Sargeant, have gone on record stating that animal welfare is indeed within the scope of the hog industry review (thank you), I feel compelled to make a brief, last minute submission to try and illuminate the issue and how it is misrepresented to the public by the hog industry and, in my experience, a provincial government – politicians and bureaucrats alike – that has become a client of the industry (I don't have time to make the latter case before your deadline, except to refer you to my analogous experience with Manitoba's egg industry: www.aquarianonline.com/Values/eggspouse.htm, or fast forward to “Who's Minding the Hens?”: www.aquarianonline.com/Values/eggspouse2.htm).

As an example, I would like to cite a current Manitoba Pork Council educational brochure titled “How Pigs are Raised” (www.manitobapork.com/downloads/brocpdfs/How_Pigs_are_Raised_Mb.pdf). I find the following passages very telling:

It's the Law!

Manitoba's Animal Care Act requires farm animals and pets to be treated humanely. Regulations under the Act draw upon various codes of practice to protect livestock.

And later:

THE NOT-SECRET CODE...

Is there a “better way” to raise pigs?

The answer is yes! It's found in the “Recommended Code of Practice for the Care and Handling of Farm Animals: Pigs”

Scientists, humane societies, veterinarians, and farmers cooperated in writing this guide.

In addition, the Animal Care Assessment (ACA) program provides producers with a means to evaluate and improve animal care on their farms. All swine producers in this program must follow the code of practice. ACA pays special attention to ensuring that those caring for pigs are well trained and understand the importance of their role in providing the following things for their animals:

- Comfort and shelter
- Fresh water and a healthy diet
- Opportunity for reasonable movement and expression of most social and behavioural needs
- Appropriate light and flooring
- Prevention of abnormal behaviour, injury and disease
- Sound equipment

It sounds very reassuring. But here's what MPC doesn't explain:

Manitoba's Animal Care Act requires you and I to treat our dogs and cats humanely. At the core of our responsibility are the "Duties of owner," which specify that

- 2(1) A person who has ownership, possession or control of an animal
- (a) shall ensure that the animal has an adequate source of food and water;
 - (b) shall provide the animal with adequate medical attention when the animal is wounded or ill;
 - (c) shall provide the animal with reasonable protection from injurious heat or cold; and
 - (d) shall not confine the animal to an enclosure or area
 - (i) with inadequate space,
 - (ii) with unsanitary conditions,
 - (iii) with inadequate ventilation, or
 - (iv) without providing an opportunity for exercise,
- so as to significantly impair the animal's health or well-being.

But if it's pigs or other "commercial animals" that we own, all bets are off. Again from the Animal Care Act:

- 2(2) A person shall not be convicted of an offence under subsection (1) for treating an animal in a manner
- (a) consistent with a standard or code of conduct, criteria, practice or procedure specified as acceptable in the regulations;
 - (b) consistent with generally accepted practices or procedures for such activity; or
 - (c) otherwise reasonable in the circumstances.

Infliction of suffering prohibited

- 3(1) No person shall inflict upon an animal acute suffering, serious injury or harm, or extreme anxiety or distress that significantly impairs its health or well-being.

Accepted activity re suffering

- 3(2) Subsection (1) does not apply where the suffering, injury, harm, anxiety or distress is caused by a treatment, process, or condition that occurs in the course of an accepted activity.

In Manitoba, using pigs for pork production represents an "agricultural use of animals" for which "accepted activities" (industry norms) trump any of the duties of owner that apply to cats, dogs and other companion animals. For example, the duties of owner say that Manitobans "shall not confine the

animal to an enclosure or area ... with inadequate space ... or ... without providing an opportunity for exercise.” Clearly this doesn't apply to the 350,000+ Manitoba sows who are confined most days of their reproductive lives inside gestation and farrowing crates where simply turning around, let alone getting exercise, is impossible.

How are these “accepted activities” defined? The MPC correctly cites the Canadian Agri-Food Research Council's “Recommended Code of Practice for the Care and Handling of Farm Animals: Pigs.” In Manitoba, CARC's Codes – which permit all kinds of cringeworthy practices spawned by factory farming, not just the severe confinement of crating sows – are law, although there is no independent auditing system in place to ensure they are being followed within the very, very private barns where three million Manitoba pigs currently reside. Instead, there is, to quote MPC's brochure once more, “the Animal Care Assessment (ACA) program [which] provides producers with a means to evaluate and improve animal care on their farms. All swine producers in this program must follow the code of practice.”

You can find the ACA manual here: http://www.cqa-aqc.ca/downloads/aca/ACA_Complete_e.pdf. Note that it is essentially an industry self-monitoring program (“The swine Animal Care Assessment has been designed as an educational and assessment tool for producers to track the welfare of animals on their farms, independent of the production system.”). Reviewing it, my impression is that its purpose is not so much to ensure that producers are following the codes as to teach them what the codes are and gradually shepherd them toward full compliance (“This program could be used as the basis for a third-party audit, if it is needed in the future to provide assurance of on-farm animal welfare.”).

This is not the same thing as MPC's assurance that “all swine producers in this program must follow the code of practice.”

I urge you to look beyond MPC's rhetoric and ask the hard questions that will enable you to tell Manitobans if the system comprised of the Codes of Practice (for pigs, these also include the codes for early weaned pigs [<http://www.carc-crac.ca/common/Code%20of%20Practice%20-%20Pig%20Addendum%20English.pdf>] and livestock transport [<http://www.carc-crac.ca/common/Code%20of%20Practice%20Transport%20-%20Code%204%20English.PDF>]), the voluntary ACA program and the relevant governmental and legal bodies is providing adequate insurance that even the highly permissive Codes are being adhered to by Manitoba pork producers. And then I would ask you to consider if the Codes themselves adequately reflect the animal welfare values of Manitobans today.