

April 9, 2009

Chair
CCVO – Farmed Animal Industry Joint Working Group
National Farmed Animal Health Strategy
NFAHS.feedback@animalhealth.ca

Dear Sir,

The National Farmers Union welcomes the opportunity to comment on the proposed National Farmed Animal Health Strategy (NFAHS) and the creation of a National Farmed Animal Health Council (NFAHC).

The National Farmers Union is a democratic, direct-membership policy organization made up of thousands of family farmers across Canada. Our policies are set annually at our national convention. The NFU has an extensive policy on livestock which advocates a number of priorities, including the importance of ensuring farmed animals are raised in conditions conducive to maintaining their health while protecting the environment and ensuring the public health and safety.

The Canadian Animal Health Coalition (CAHC) states in its 2007-2008 annual report that: “75% of emerging human diseases are zoonotic in origin” and acknowledges that the implications of “animal health” cannot be confined strictly to animal agriculture.

Animal diseases and food-borne pathogens are spread as a result of many factors, including production, transportation, processing, and wholesale and retail distribution. Clearly, it is important that outbreaks of these diseases be prevented, and that the spread of such diseases be contained as much as possible.

However, it is also of critical importance that the economic interests of the family farmer, the interests of the public, the protection of the environment, and the well-being of the farmed animals themselves, be given top priority. Too often, the costs associated with a disease outbreak are borne disproportionately by the producers themselves. This is a particularly important issue given the priority that is accorded by governments to bilateral and multilateral free trade agreements. Trade considerations are important, but must be viewed in context.

There is a direct correlation between the rise of zoonotic diseases and the globalization of trade. It is also evident that while a national strategy aimed at controlling the spread of a disease outbreak is a necessary precaution, experience has shown that it is virtually impossible to prevent the transmission of disease across international boundaries.

As award-winning author Andrew Nikiforuk points out in the best-selling book, **Pandemonium**, published in 2006 by Viking Canada, the next pandemic originating out of animal-borne diseases could quickly overwhelm even the most comprehensive national disease-containment plan:

“If the next invader is a kin of the bird flu or H5N1, it will go global in weeks and soon be out of control. As it explodes around the world, the invader will find three conditions unique to our era: a just-in-time global economy, unprecedented urban crowding, and unparalleled human mobility that our ancestors might have regarded as miraculous or even divine. These unwitting preparations will shape the next pandemic and drive it into unknown territory.

“Ultimately, a severe pandemic might encourage us to rethink the deadly pace of globalization and biological traffic in all living things. Ian Welsh believes that people will travel less, trade less, and care more about the public health in a post-pandemic world. ‘There will be a lot less foreign goods on the store shelves,’ he suggests, and he is probably right. After the Great Mortality we might question the crowding of livestock into factory farms, the separation of veterinary and human medicine, the pollution of our waters, our dramatic fouling of the weather, the vulnerability of monocultures, and the globalization of everything. Maybe we will learn that we can’t liberalize trade without liberating biology in unpredictable ways.”

The rise of new diseases also correlates with the increased economic power of a few large corporations engaged in processing of cattle and hogs, and the requirements they impose on farmers - the suppliers of their raw materials. These companies, with the active assistance of governments at both the provincial and federal levels, have restructured the industry to serve their own ends. In the process, Canada has become increasingly reliant on intensive livestock operations and confined animal feeding operations to supply centralized processing facilities owned by a small number of major corporations.

The NFU believes it is important that family farmers have input into the proposed NFAHS.

At the present time, the objectives outlined in the NFAHS are many and varied:

1. Reducing potential disruption of domestic and international trade;
2. Facilitating rapid introduction of new veterinary pharmaceuticals onto the market and protecting the proprietary interests of pharmaceutical companies;
3. Facilitating the implementation of the National Agriculture and Food Traceability System;
4. Protecting the public interest;
5. Protecting animal health and welfare; and
6. Protection of the environment.

The reality, however, is that there are contradictory objectives inherent in this overall framework. For example, regulations designed to protect the public interest also have the effect of placing limits on corporate profits. In recent years, governments have taken steps to deregulate many industries – all under the guise of “modernizing” or “streamlining” the regulatory environment. Pressure to implement these regulatory changes has come from industry, not from farmers, and the end result of the deregulation is increased profitability for corporations but reduced protection for farmers, consumers and the environment.

For example, the large grain companies have successfully lobbied the federal government to reduce the regulatory authority of the Canadian Grain Commission (CGC) and the Canada Grain Act. Changes to the Kernel Visual Distinguishability (KVD) system were unilaterally proclaimed

by the government through regulatory changes in August, 2008. Legislative changes to the *Canada Grain Act* were introduced in Parliament (Bill C-13) but have not yet passed Second Reading. Similarly, seed and pharmaceutical companies have pursued an agenda aimed at deregulating the seed and variety registration system through the National Forum on Seed. The National Forum on Seed shares some similarities with the proposed National Farmed Animal Health Council – in that industrial processors and pharmaceutical corporations would be able to exert significant influence over the Council’s recommendations to government.

The contradictory objectives of the NFAHS are not unprecedented. In fact, the Canadian Food Inspection Agency (CFIA) currently operates under a similar dual mandate. It is responsible not only for regulating big business to ensure food safety, but also is mandated to expand Canada’s overall export trade by facilitating market access for companies. It is also responsible for harmonizing its regulatory framework with Canada’s major trading partners to ensure uninterrupted trade flows into and out of Canada.

The NFAHS should be a vehicle for ensuring farmers’ concerns and recommendations are brought forward and acted on. It should not be a buffer designed to deflect responsibility away from government or multinational corporations. It should also not be a mechanism designed to overrule farmers’ concerns by giving too much weight to industry profitability. The National Farmed Animal Health Council should be an advisory body to government and not be allowed to become a vehicle for deregulation of the industry. It should not replace the regulatory function of government.

Any additional costs for family farmers associated with NFAHS should not be borne solely by the family farmer. Farmers should be compensated fairly for any increased responsibility for complying with additional regulations associated with the NFAHS. In the event of an outbreak of disease which results in the loss of income from their land and/or animals, farmers should also be compensated fairly. The federal and provincial governments must assume the costs associated with measures designed to ensure protection of the public; while industry must assume the costs associated with ensuring their facilities and products comply with a regulatory environment designed to protect the public interest, the environment and animal health.

Thank you for the opportunity to provide input on this initiative. We look forward to continuing communication on this important issue.

Sincerely,

Terry Pugh
Executive-Secretary
National Farmers Union