

October 23, 2023

Standing Committee on Health
Sixth Floor, 131 Queen Street
House of Commons
Ottawa ON K1A 0A6
Canada

Via: HESA@parl.gc.ca

RE: Bill C-293, *An Act respecting pandemic prevention and preparedness*

Dear Members of the Committee:

On behalf of the undersigned representatives of Canada's approximately 190,000 farm families, including commodity and general farm organizations, from coast to coast to coast, we submit to you our comments on the Standing Committee on Health's study on Bill C-293, *An Act respecting pandemic prevention and preparedness*.

Concern with the Bill's impact on the Canadian animal agriculture sector

We support the overall objective of Bill C-293, *An Act respecting pandemic prevention and preparedness*, which is to support pandemic preparedness, including measures that aim to enhance transparency regarding readiness levels and efforts that seek to strengthen Canada's domestic manufacturing capacity with respect to any products relevant to pandemic production. The COVID-19 pandemic clearly illustrated the importance of strong domestic supply chains which ensure a continuous supply of essential goods to Canadians.

However, we write today to express significant concerns with aspects Bill C-293, particularly in its impact on the Canadian animal agriculture sector. While the primary objective of the Bill is pandemic prevention and preparedness, it contains content and language that will adversely affect Canadian farmers and ranchers if passed in its current form. Specifically, we are concerned by the Bill's language around livestock farming, the promotion of alternative proteins, and the focus on animal agriculture in the context of antimicrobial resistance rather than within the more comprehensive One Health perspective.

Irrelevant focus on alternative proteins, in the context of pandemic preparedness

In particular, section 4 (2) (l) of Bill C-293 dissents from the tone and language used throughout other sections of the Bill and instead, includes language promoting the production and use of alternative proteins and the regulation of animal agriculture, and the phase-out of high-risk species.

Where the remainder of the Bill is seen as allowing the Advisory Committee the flexibility to "assess" the capability of the Public Health Agency of Canada to respond and "analyse" the health, economic and social factors *relevant* to the impact of the pandemic, Section 4 (2) (l) pivots to the incorporation of language such as "regulate" and "phase out". This language is suggestive that the Bill has made the incorrect and unsupported assumption that animal agriculture in Canada is a cause of, or contributes to, the spread of disease, a notion we unequivocally reject and is not supported by evidence. In our view, this is inconsistent with the mandate of the Advisory Committee and the objectives of Bill C-293.

Animal-based proteins, including meat, poultry, fish, eggs, and milk products are considered high-quality protein sources that provide essential nutrients required for a healthy body and brain functioning. Moreover, animal protein foods provide key essential vitamins and minerals which are commonly missing in the diets of many Canadians and in a form that can be well absorbed by the body. Notably, there is no evidence which suggests that animal-based proteins are the cause of pandemics and require phasing-out, as the Bill suggests.

Biosecurity in Canadian agriculture

Furthermore, section 4 (2) (I) of the Bill suggests antimicrobial resistance is an issue specific to agriculture; this is not the case. Antimicrobial resistance is an issue which needs to take the One Health approach, discussed elsewhere in the Bill, to tackle this issue from the human, animal, and environmental perspective.

Finally, Bill C-293 does not take into consideration that the Canadian animal agriculture sector rigorously monitors animal health and wellness and operates under a high level of biosecurity and regulations. Canadian farmers closely monitor their animals and follow stringent biosecurity protocols and standards to protect their animals from disease. Programs such as, for example, *Raised by a Canadian Farmer On-Farm Food Safety Program*, *Start Clean-Stay Clean*[®], *proAction*, and the *Canadian Hatching Egg Quality (CHEQ™)* program, are acknowledged by the Canadian Food Inspection Agency (CFIA). Such programs and protocols are designed to reduce the risk of pathogens and diseases through evidence-based practices and are consistently and effectively delivered across Canada.

Proposed amendments to Bill C-293

As a result, we would recommend the following specific amendments be made to the Bill to ensure it aligns with its stated objective and avoids any unintended consequences for Canadian producers.

- **Recommendation #1:** That Section 4(2) (I) be removed to allow the Advisory Committee the flexibility to undertake its mandate and to focus its attention on pandemic prevention and preparedness.

Specifically, our concerns relate to the use of the words “regulate” and “phase out.” It is recommended this wording be removed or changed to consistently use “assess” or “summarize.”

- **Recommendation #2:** That the Bill include language that encourages continued support and enforcement of existing biosecurity initiatives, including industry-led initiatives.
- **Recommendation #3:** That the reference to “high-risk species” in Section 4 (2) (I). iv. be clearly defined.

We thank you for the opportunity to submit to you our comments on the Standing Committee on Health’s study of Bill C-293, *An Act respecting pandemic prevention and preparedness*. We would welcome the opportunity to discuss these issues further.

Sincerely,

