



# What We Heard and How We Addressed It

## Updating Canada's Code of Practice for the Care and Handling of Dairy Cattle

### INTRODUCTION

In 2019, Dairy Farmers of Canada initiated an update to the 2009 Code of Practice for the Care and Handling of Dairy Cattle. The Code's re-development was led by an 18-member committee of dairy farmers, veterinarians, researchers, technical and program implementation experts, and representatives from milk processors, animal welfare advocacy, provincial and federal governments, and allied sectors (veal and beef cattle).

This report aims to essentially tell the story of how the dairy cattle Code was finalized after the public comment period. The report focuses on top-of-mind concerns identified in NFACC's 2019 [survey](#) not only because these topics were at the forefront throughout the process but also because they tended to coincide with topics that received the most input during the comment period. The report should be read alongside the actual Code ([available here](#)).

Code topics discussed in this report:

- Housing
- Movement (freedom of movement and space allowances)
- Painful and stressful practices
- Handling
- Lameness

Since the comment period, a general coming-into-effect date was added to the Code (in the preface) stating that the new Code applies as of April 1, 2024 (i.e., one year after publication) unless indicated otherwise in Requirements with a later phase-in date. A general coming-into-effect date was suggested during the comment period and has been used for legislation and other standards. The committee recognizes that time is needed to distribute the updated Code and communicate the new Requirements and that farmers, like all professionals, are more likely to achieve change successfully if given time to properly plan and carry out the changes in ways that work for their unique circumstances. The 2009 dairy cattle Code will remain in effect until March 31, 2024.

### FACILITIES AND HOUSING

The sections in the housing chapter that received the most input during the comment period were calf housing, cow housing, and calving areas. Comments received on these and other housing sections were notably longer than the comments for other chapters, likely an indicator of how important the housing chapter is to most stakeholders.



#### Section 2.2.1 – Calves (Pre-Weaning)

To address feedback that the draft expectations in this section were confusing, the Requirements were re-ordered, and headings were added. The Requirement about bedding quality was removed since it is stated in Section 2.8 (a section that applies to all ages of cattle).

Commenters expressed passionate views about calves. This included valuable insights from veterinarians and producers with experience managing calves in various systems and many consumers concerned about overall care, socialization, and health of calves.

The committee reduced the transition period for pair/group housing in indoor systems from 10 to 8 years and notes that this complex transition will require significant effort and commitment from farmers, veterinarians, advisors, and researchers. This being a national standard, the committee needed to consider that while some farmers already house calves socially (or could do so fairly soon), others will need the full transition period, especially if making major changes or investments to other housing systems on their farm.

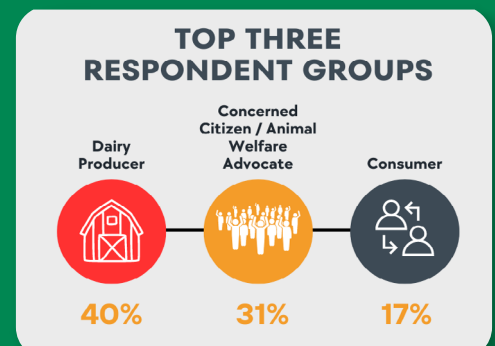
## Public Comment Period by the Numbers

The public comment period ran from **November 29, 2021 – January 27, 2022**.

**50** organizations and **5,834** individuals participated.

The Code Development Committee had more than **20** meetings over several months to consider all the input and reach consensus on the Code of Practice.

### WHO WE HEARD FROM



### WHERE WE HEARD FROM



### TOP THREE GEOGRAPHIC REGIONS

Quebec – 49%\*  
 British Columbia – 20%  
 Ontario – 13%

#### \*Quebec Respondents

Of the Quebec respondents, the majority identified as a dairy producer (54%), concerned citizen/animal welfare advocate (19%), and a consumer (15%).



Photo credit: ACER Consulting

*A Code of Practice evolves so that farming's best practices stay rooted in the latest science and research. The perspectives and feedback from dairy farmers during the comment period helped create a new Code that will uphold Canada's high standards and guide continuous improvement in the future.*

**David Wiens,  
Manitoba dairy farmer and  
Chair of the Code Committee**

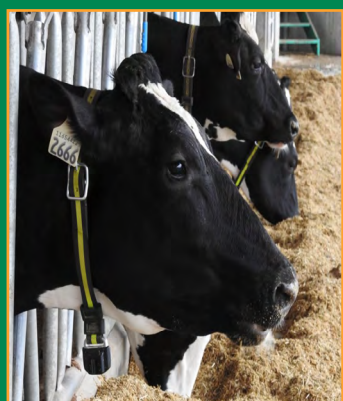


Photo credit: ACER Consulting

To encourage a gradual and well-managed move to pair/group housing, a Requirement was added that producers develop a transition plan in consultation with a veterinarian or other qualified advisor. Cross suckling was among the main concerns about pair/group housing, and research on risk factors and strategies to reduce the occurrence of this behaviour is now summarized in *Section 3.3 – Nutrition and Feeding Management for Calves*.

While all indoor systems must pair/group calves early in life by 2031, the Code recognizes that responsible calf care includes assessing individual calf suitability for being socially housed ([see the 3<sup>rd</sup> Requirement for indoor housing, including the footnote](#)).

Divergent views were expressed about tethering calves. The committee retained the Requirement prohibiting tethering in indoor systems. Rather than phase out all calf tethering, the final Code allows calves to be tethered to a hutch or other outdoor housing if calves have access to an outdoor area and therefore fresh air (critical to calf health) and increased space allowance (features that provide welfare benefits). Calves housed outdoors must also be able to have physical contact with another calf unless they need to be separated for health reasons or protected from inclement weather.

### Section 2.2.3 – Lactating and Dry Cows

Consumers, farmers, veterinarians, advisors, and others provided detailed input on what they see as advantages and disadvantages of different cow housing systems (free stalls, tie stalls, bedded packs).

The [1<sup>st</sup> Requirement](#) (which sets out expectations for all cow housing) was well supported and did not change.

For the [2<sup>nd</sup> Requirement](#), regarding opportunities for movement, feedback suggested a need for clarity; therefore, this Requirement was revised to focus specifically on tethered cows. While commenters expressed diverse views on tethering, a range of stakeholders supported providing tethered cows opportunities for freedom of movement. Committee members agreed that a fundamental obligation for responsible care, and one that is achievable and advances cow welfare, is that cows are not tethered continuously throughout their entire production cycle (calving to calving). These principles formed the basis of the final wording of this new Requirement.

A takeaway from the feedback was that while some farms are already achieving the 2<sup>nd</sup> Requirement, others need time and resources to ensure the change is made in ways that result in good outcomes for the cows. As such, a 4-year transition period was added.

Many commenters expressed a desire for the Code to include specific frequencies and durations of opportunity for movement for tethered cows. Various options were considered, and a recommendation was included based on the research currently available. However, more research is needed to establish appropriate minimum expectations that would consistently result in good welfare for cows on all farms. This section's preface now more clearly states that what constitutes sufficient regular opportunities for movement will be defined according to research as it becomes available.

The 3<sup>rd</sup> Requirement (that newly built barns must allow daily, untethered freedom of movement and social interactions year-round) was well supported and applies as soon as the Code comes into effect.

### Section 2.3.1 – Calving Areas

The 1<sup>st</sup> Requirement sets out attributes that must be met in calving areas on all farms when the Code comes into effect; it was refined to clarify that it refers to individual and group calving areas. The transition period for all calvings to be in loose-housed maternity pens, yards, or pastures was increased from 5 to 6 years. This change was made given the input on the complexity and costs of making this change on some farms.

## 2.6 – Space Allowances

For free stalls, the draft Code proposed a maximum stocking density of 1.1 cows per stall (equivalent to 110 cows for 100 stalls) that would come into effect upon publication of the new Code. This was not well supported: some commenters requested that no overstocking be permitted, while others requested that a density of 1.2 cows per stall be permitted.

After much discussion, the committee agreed to transition to 1.1 cows per stall by 2027 and to an even stocking density (1 stall for every cow) by 2031 while also allowing stocking density to be temporarily increased to 1.2 cows per stall during and after the transition periods to provide some flexibility for herd management. While the feasibility of this transition is improved through the stepwise approach and the flexibility to temporarily increase stocking density, the committee recognizes that this transition could have significant economic implications for affected farms. However, the move towards even stocking density is important for ensuring cows do not have to compete for resources and is consistent with the research—factors that were important to both industry and non-industry commenters.

The space allowance in the last Requirement (9.3 m<sup>2</sup> per Holstein cow) was generally supported and did not change; this Requirement now refers to group pens (based on input about the need to capture production contexts beyond bedded packs).

## HUSBANDRY PRACTICES

### Section 4.2 – Surgical and Husbandry Procedures

The 2009 Code established important standards for painful procedures, and these were either maintained or strengthened in the updated Code. The committee was persuaded by the many thoughtful comments that a draft Requirement about post-procedure monitoring of cattle was too basic and narrow in scope. Therefore, the Requirement was replaced with one that addresses all main aspects of performing these procedures competently (e.g., following a method developed in consultation with a veterinarian, providing pain relief, and using procedures to minimize the risk of complications).

This section now serves as a core part of the chapter with one broad-based Requirement (applicable to many contexts). The procedure-specific sections that follow were then streamlined to focus on any details unique to that procedure or topic. These types of changes (made throughout this and other chapters) helped make the Code more comprehensive and user friendly.

### Section 4.1 – Handling

Commenters supported this section's expanded content about low-stress handling and restraint. A draft Requirement that "handling aids must be purpose designed to safely move cattle" was removed based on feedback that such a Requirement would, paradoxically, allow the routine use of inhumane handling aids (simply because they are purpose designed) while prohibiting the use of appropriate handling aids that, while not formally designed for handling, are safe and low stress for cattle.

Much feedback was received on the use of electric prods, with some supporting the draft Requirement to fully prohibit their use and others expressing concerns about this potential change. Diverse stakeholders share an underlying concern about stress cattle may experience during handling, and those who support the use of prods strongly emphasized the need to use them very sparingly, if at all. Rather than prohibit prods, the final Requirement on prods stipulates that they must only be used in extreme situations, such as when an animal's safety is at risk. Other key context for the handling Requirements is noted in the section's preamble.

## CATTLE HEALTH

Not surprisingly, many commenters care about animal health and took the time to carefully review all aspects of this chapter, often suggesting improvements to some of the technical content in the Recommended Practices.



Photo credit: ACER Consulting

*I am particularly proud to have been part of this process. While not easy, this unique step-by-step approach, the strong reliance on scientific literature, and the openness to public consultation makes the commitment so worth it.*

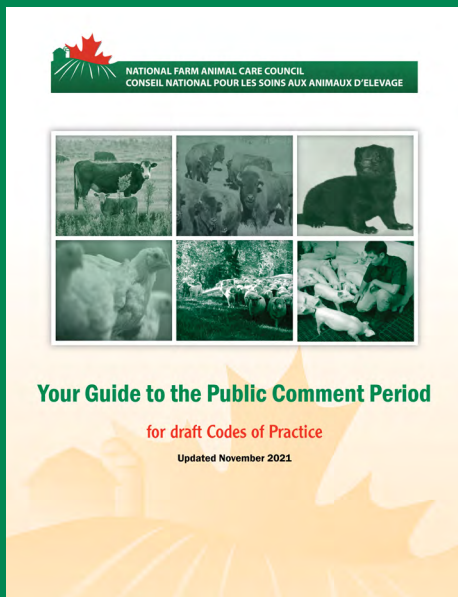
**Dr. Elsa Vasseur,  
Co-Chair of the Scientific  
Committee and NSERC  
Industrial Research Chair**



**The research report on priority welfare issues is cited 92 times in the updated Code!**



A common thread throughout all aspects of the Code Development Process, including the Public Comment Period, is the principle of continual improvement. Canada has set a unique path that is based on pursuing this goal through the multi-stakeholder, consensus-based approach that is led and coordinated through NFACC.



## Your Guide to the Public Comment Period

Funded in part by the Government of Canada under the Canadian Agricultural Partnership's AgriAssurance Program.



## Section 5.7 – Promoting Optimal Foot and Leg Health

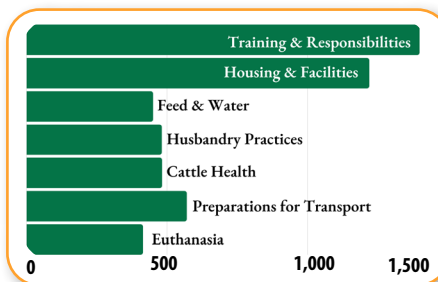
Commenters pointed out that the draft Requirements (about assessing, diagnosing, and treating gait abnormalities and injuries) were similar and repetitive. These Requirements were therefore streamlined into one, which also reduced redundancy with Requirements earlier in the chapter.

Feedback highlighted confusion regarding the Requirement that producers have a “target” for lameness and leg injuries, above which corrective action would need to be taken. The Committee changed this to “threshold” throughout the section. Wording was also added to this Requirement to clarify that its intent is to drive improvements that will ultimately minimize lameness and leg injuries. This core Requirement is complemented by many Recommended Practices offering specific strategies to help producers achieve this fundamental objective.

### Section 5.7.1 – Hoof Trimming

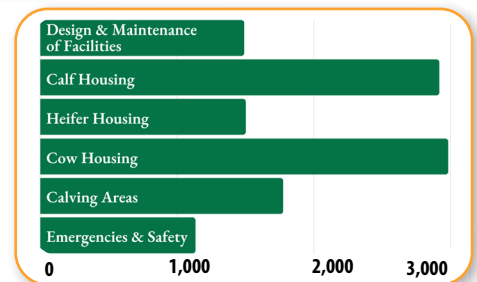
The Requirements in this section were generally well supported. The committee retained the Requirement about infectious lesions since those necessitate treatment specifically to control the infection. Not all lameness cases necessitate a treatment per se—some can be appropriately addressed through therapeutic trimming and associated care (see 3<sup>rd</sup> Requirement). The preamble now includes clarification that strategies to relieve pain or pressure and promote healing include a trim, hoof block, or analgesic.

The 4<sup>th</sup> Requirement (about pain control for an invasive hoof trim) was well supported. To address questions about what constitutes an invasive hoof trim, a definition for that term was added to the glossary.



Average number of Comments for each Chapter of the Code

Subsections of the Code that received the most comments



## Thank you!

Thank you to all those who participated in the comment period. Your feedback led to improvements throughout the entire Code. Thank you also to those who included laudatory comments about the draft Code noting the obvious amount of time, effort, and expertise that members of the committee brought to the work. These comments were also highlighted for the committee, and the appreciation expressed helped them carry on their hard work into the last stretch of making final decisions.

Research needs identified through this project are summarized [here](#).

