



NATIONAL FARM ANIMAL CARE COUNCIL
CONSEIL NATIONAL POUR LES SOINS AUX ANIMAUX D'ÉLEVAGE



Your Guide to the Public Comment Period

for the draft Codes of Practice

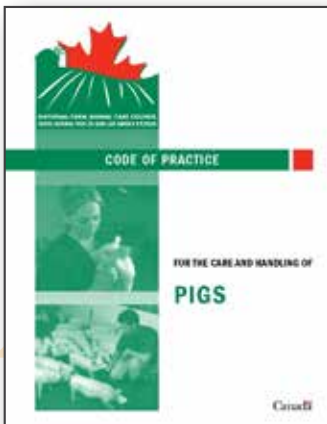
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“Harvesting ideas and building consensus through a multi-stakeholder approach is the backbone of our process. The Public Comment Period is a vital component. We encourage participation by anyone with an interest in farm animal care because this ultimately supports a robust process and helps make the Codes the best they can be.”

– Jackie Wepruk, General Manager of NFACC



Public comments fuel Canada's farm animal care progress

Viewpoints from a broad range of stakeholders play an important role in the development of Codes of Practice for the care and handling of farm animals

Farm animal care is a critically important part of livestock production. Everyone from farmers to consumers has a valuable role to play – and an important voice to add to the conversation – as new knowledge, opportunities for innovation and the expectations of the marketplace continue to evolve.

This is why public feedback is an essential part of Canada's process for developing Codes of Practice for the care and handling of farm animals. A well-structured and robust Public Comment Period is crucial to support the quality and success of these standard-setting documents.

The opportunity to participate in the Public Comment Period for each Code is open to all who have an interest in supporting Canada as a leader in farm animal care as part of a well-managed and competitive food system. Your feedback plays a vital role in providing a check and balance to the Code development process and in determining the direction set in the final document.

This *Guide to the Public Comment Period* provides an overview of this indispensable component of the process and how it supports Code development.

'The Codes' 101

Setting the bar for Canada's approach to farm animal care

Canada has established Codes of Practice for the care and handling of farm animals that serve as the national understanding of animal care requirements and recommended practices.

Each Code is targeted for particular livestock and poultry species, and collectively these documents cover all the major types of livestock and poultry raised on farms across the country.

In recent years, there has been a major effort undertaken to update these Codes of Practice to better reflect today's knowledge and expectations.

This process has been led and coordinated by the National Farm Animal Care Council (NFACC), which represents and involves a broad range of stakeholder groups including farm animal industries, animal welfare organizations, retail and food service, the veterinary community, government and other allied groups with an interest in farm animal care. Learn more about the Codes of Practice and NFACC at www.nfacc.ca

Q: What is the role of the Public Comment Period?

The Public Comment Period ensures everyone has the opportunity to have their say. It also has a critical role in supporting robust final discussions on any revisions needed before the Code is finalized.

The Codes of Practice for the care and handling of farm animals serve as Canada's national understanding on animal care requirements and recommendations. This is something many people, from farmers to consumers, have an interest in. It is important that anyone who wishes to have a voice in this process has that opportunity. The Public Comment Period is an important way to allow this and facilitate valuable feedback that supports the Code development process.

It's important to note that individuals can contribute their viewpoints to the process prior to the Public Comment Period; through industry associations and other organizations that represent them and have a seat at the Code development table.

Listening to Canadian voices

All viewpoints expressed are heard and play a role in Canada's direction

Is my viewpoint heard and do I have an influence?

This is arguably the most important question for anyone who chooses to participate in the Public Comment Period process. The answer is an emphatic "Yes".

No-one knows this better than the individuals who have served as Code Secretaries on each of the Code Development Committees that have been formed to carry out the development of the updated Codes of Practice.

It is the Code Secretaries who are charged with receiving all of the feedback from the Public Comment Period and organizing and providing this to the Committee members they facilitate. Here is a small sampling of their comments on this process:

"All of the comments we received were handled very carefully to make sure they were considered as part of the process. In the case of a Code with lots of feedback, such as the Pig Code, this involved a lot of painstaking work to organize, including categorizing and sub-categorizing the comments so they could be accessed and reviewed by the committee as efficiently as possible. Our commitment was to make sure all of the comments were considered as part of the process and I can unequivocally say that is what happened." – Betsy Sharples, pig Code Secretary

"Committee members were very pleased with the diversity of people who provided input and how that enhanced the final Codes." – Nadine Meade, Secretary for three different Codes, Code secretary for mink, farmed fox and sheep Codes

"One of the aspects that impressed me was the care taken by committee members to make sure all viewpoints from the comment period were heard and carefully considered." – Allison Taylor, beef cattle Code Secretary

"We considered and used a range of options to best organize the feedback. Committee members came to their meetings having reviewed this information and ready to discuss. All comments had a role in the final review and revision process." – Caroline Ramsay, equine Code Secretary

Protecting your privacy

Measures are in place to protect the privacy of both individuals and organizations who submit information as part of the Public Comment Period.

"As an individual, when you submit information you are required to enter your name and email address," says Mikki Shatosky, NFACC Project Assistant. "This helps ensure the integrity of the information. It also provides us with a way to contact the person providing the feedback if there is a question about their submission. However, names and email addresses are kept in confidence." They are not provided to the Code Development Committee or shared publicly.

"When official submissions are made on behalf of an organization, the name of the organization is identified along with the information submitted when it is provided to the Code Development Committee," says Shatosky. "This recognizes the particular expertise that an organization may have, along with the rigorous process that some organizations would have undertaken to arrive at a collective submission amongst their membership." However, this information – including names of organizations sources and the feedback they provided – is not made public by NFACC.

If you have specific concerns related to privacy, please contact NFACC directly for more information.

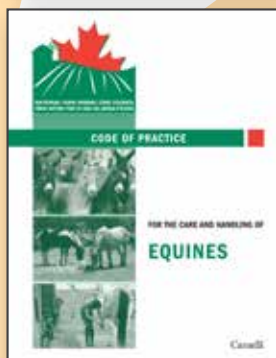
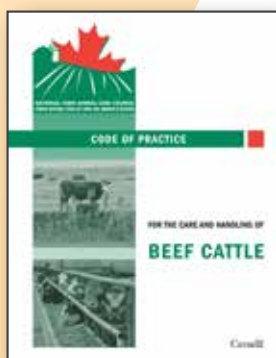
Q: Any tips for providing effective feedback to the Public Comment Period process?

While all constructive comments are included in the Code Development Committee's deliberations, submissions that include alternative wording and references (if applicable) are particularly helpful.

Here are a few tips to consider when developing a submission:

- **Be constructive.** Criticism is welcome and valid. But it's more powerful when it comes with suggested solutions.
- **Tell your story.** Committee members are interested in what the Codes mean to real people in the real world. Your personal viewpoint on how the changes will affect you, either positively or negatively, can resonate strongly with the committee.
- **Quality over quantity.** Multiple submissions with the same cut and pasted comments can convey a strong message around a particular stakeholder viewpoint and this will be noted by the Code Development Committee. However, the Committee particularly appreciates submissions that help them to resolve differences and arrive at a quality Code.
- **Be polite.** Blatant attacking and name calling is not tolerated. There is "zero tolerance" for submissions with profanity.

Everyone involved in the NFACC process comes with the simple goal of helping Canada continually improve. What are your viewpoints that can support that goal?



The Public Comment Period process

Supporting strong Codes for a sustainable future

The pathway toward a newly updated Code of Practice includes a number of important milestones (See *Road to the Codes*), with the Public Comment Period playing a crucial role in ensuring a workable and effective approach before each new Code is finalized and implemented.

Here's a breakdown of the key steps related to this Public Comment Period:

Step 1: Dates are determined

A majority of the Code development process centers on the various stakeholders who make up the Code Development Committee working together to develop a draft document. Once this critical achievement is realized, the focus turns to organizing and delivering the Public Comment Period.

To support a process that is both manageable and timely, the length of the Public Comment Period is set at 60 days for each Code. The aim is for this period to begin soon after a draft Code is developed, to support an efficient Code development process.

Step 2: Communication is delivered

Communication is critical at every stage of Code development to keep stakeholders informed and support good process. This includes a multi-component communication effort to support awareness of the Public Comment Period and encourage participation, led by a joint announcement from NFACC and the industry group that initiated the Code development or update process.

Step 3: Comments are received

Once the Public Comment Period begins, those who wish to participate have the opportunity to review the draft Code of Practice and submit their comments.

The draft Code is made available on the NFACC website, at www.nfacc.ca, which also includes an electronic format participants can use to enter and submit their comments. Typically, industry organizations such as producer associations, as well as organizations representing other interest groups, provide links to this online system through their own websites and some also offer assistance with submitting comments. This approach allows for a consistent approach across different Codes. It also allows effective and secure collection and storage of comments for easy access in a consistent platform. Overall it supports the quality of the process and the fulsome consideration of the comments made.



Step 4: Feedback is organized and provided to Committee

The comments received through the NFACC website are then provided to the secretary of the Code Development Committee. The secretary is charged with organizing and providing this information to the Committee in a manner that is most effective. Code Secretaries organized information in a logical format, based on considerations such as the volume of comments and what made sense for the Committee members they are supporting.

Effort is made to provide the information in a timely fashion following the completion of the Public Comment Period, with the specific timing varying somewhat depending largely on the volume of information the Code Secretary is required to manage.

Step 5: Committee reviews comments and determines any changes needed

The comments are provided to Committee members in a manner that allows each member to review on their own before discussing as a full Committee.

A date is also determined for a full Committee meeting to discuss the feedback received and determine any changes needed to the Code as a result. The length and number of meetings required depends on how quickly consensus is reached on each of the issues raised by the Public Comment Period feedback. Typically one or two multi-day sessions are required. However, in the case of the Pig Code, for example, which received far more submissions than any other Code process to date, three two-day meetings and multiple teleconferences with smaller sub-committees between meetings were required.

Once consensus is reached, arrangements are made to revise and finalize the Code as needed before the Code Development process is fully completed.

Q: Is my viewpoint heard in the Public Comment Period and do I have an influence?

Absolutely. Every submission is reviewed and considered as part of the deliberations of the Code Development Committee.

The comments received on some sections of a draft Code can be substantial and convey a wide spectrum of perspectives. All comments are considered within the context of the Code Development Committee's discussions that led to the original draft Code, as well as all the other feedback submitted.

By the numbers

Seven new Codes of Practice have been completed for different species in recent years – dairy cattle, mink, fox, equine, beef cattle, sheep and pig.

Here's a rundown of the approximate number of comment submissions received for each of the Codes during their respective Public Comment Period. They provide a window on the workload handled related to the Public Comment Period process for each Code.

- Dairy cattle – Approximately 120
- Farmed Mink – Just under 200
- Farmed fox – Just over 200
- Equine – About 600
- Beef cattle – Approximately 400
- Sheep – About 200
- Pigs – Over 4,700

Rising participation

As the profile of NFACC, the Codes of Practice development, and Public Comment Periods has risen, participation has increased to a high level, says Jackie Wepruk, General Manager of NFACC. The most recent example is the Pig Code development process, during which the Public Comment Period generated over 4,700 submissions representing over 32,000 individual comments.

“This is an extremely high level relative to what we have seen with the other Codes and a major reason is the high public profile of sow housing which drew the vast majority of comments,” says Wepruk. “However this is also a very positive indication that the approach is working and people are using the opportunity available through the Public Comment Period. Having a high level of multi-stakeholder participation in all of our processes has been recognized by NFACC members as one the critical components of building a successful future of continual progress in farm animal care.”

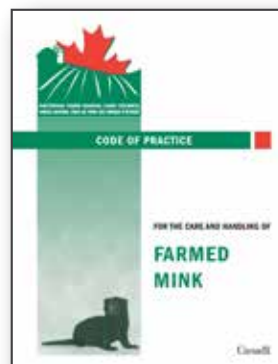
Road to the Codes

The development of updated Codes follow specific stages that are designed to make the process transparent, collaborative, science and consensus-based, and participative. A brief snapshot of the major components includes these steps:

1. **Getting started.** Industry group identifies need for Code revision and initiates the process with NFACC.
2. **Building the team.** A Code Development Committee is formed based on Guiding Principles established by NFACC.
3. **Getting focused.** Priority welfare issues are identified.
4. **Hearing ‘what the science says’.** A team of leading scientists reviews the scientific literature for each priority welfare issue and develops a report for the committee.
5. **Working together to nail down a draft.** The committee develops a draft Code using consensus-based approach (which can take considerable time and effort) to guide the decision-making.
6. **Facilitating public comments.** NFACC makes the draft Code available for a 60 day Public Comment Period.
7. **Final considerations.** Committee members methodically consider and discuss all of the comments received and use this feedback as a basis to determine if any revisions are needed before the Code is finalized.
8. **Delivering the goods.** The committee submits its final Code to NFACC and industry prepares for implementation.

Q: Who can participate in the Public Comment Periods for Codes of Practice?

Everyone. The opportunity to participate in the Public Comment Period for each Code is open to anyone with an interest in supporting this country as a leader in farm animal care as part of a well-managed and competitive food system.



Q: How are people made aware of the Public Comment Period?

A press release announcing the Public Comment period is distributed to media, industry, the broad spectrum of organizations involved with NFACC, and to a range of additional stakeholder communications outlets and channels. In turn, these outlets further cast the message amongst their readers and stakeholders. A reminder is also issued to announce the impending close of a Public Comment Period.

NFACC works closely with media, industry and other communications outlets throughout all stages of the process, to support coverage of Code development activity including awareness of the timing of Public Comment Periods and how to participate.

NFACC's website (www.nfacc.ca) provides the latest information on NFACC's activities, including work on specific Codes and the various stages of Code development.

Get more detailed information on this process at www.nfacc.ca.

Working toward continual improvement

NFACC encourages feedback on the Public Comment Period and all aspects of Code development

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.

“Bringing different groups around the same table and working together to achieve consensus is no small feat and often represents a substantial challenge,” says Edouard Asnong, a Pike River, Québec, hog farmer and chair of NFACC. “However this has also been recognized as a major strength. It supports the development of Codes that not only first and foremost ensure the responsible care and good welfare of farm animals, but also accomplishes this in a balanced way that is workable and acceptable to a broad and diverse range of stakeholders.

“But it’s one thing to debate and find consensus within the room. We also need to encourage dialogue and input more broadly at the public level. This is why the Public Comment Period has been, and will continue to be, a critically important part of the process for Code development.”

Evolving to meet new expectations

The needs and discussion around farm animal care will continue to evolve, and continue to be informed by new knowledge from science and opportunities identified for innovation, says Asnong.

Likewise, the process for Code development, including how the Public Comment Period is conducted, is likely to be fine-tuned and evolve over time, based on feedback from the stakeholders involved at all levels.

“Leadership in farm animal care means we must be committed to keep improving in everything we do,” he says. “This principle is integral to NFACC as an organization. It is also important for Canada as it strives toward solutions that are good for animals, workable for farmers, and help us meet the new expectations in the marketplace.”

Funding for the Codes of Practice is provided by Agriculture and Agri-Food Canada (AAFC) through the Agricultural Flexibility Fund, as part of Canada’s Economic Action Plan.

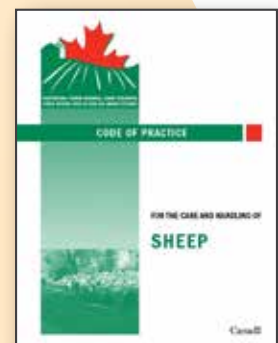
Q: How does Canada’s approach to public input on farm animal care compare to other countries?

Through the National Farm Animal Care Council (NFACC), Canada has a national approach to farm animal care that is based on a model of multi-stakeholder participation and consensus-based decision-making. This unique approach has many advantages and may be a model for other countries.

The Public Comment period is one way that multi-stakeholder participation is supported in the development of Codes of Practice for the care and handling of farm animals. Comments are encouraged from anyone who wishes to add their voice to the discussion and have their viewpoints considered in the Code development process. This supports a robust process and helps the Codes achieve an effective balance that reflects multi-stakeholder interests and priorities.

Q: Why does the Public Comment Period have a 60 day timeframe?

The 60-day period balances the need to ensure stakeholders have time to provide quality feedback while maintaining an efficient and manageable process.



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