



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



Your Guide to the Public Comment Period

for draft Codes of Practice

Updated November 2021

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Building consensus through a multi-stakeholder approach is the backbone of the Code development process and the Public Comment Period is a vital component. Participation is encouraged because this ultimately supports a robust process and helps make the Codes the best they can be.



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 process.

It's important to note that individuals can contribute their viewpoints on a Code's development prior to the Public Comment Period; through an initial top-of-mind survey, as well as through industry associations and other constituent organizations that have a seat at the Code table.

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.

Codes are targeted for particular livestock, fish and poultry species, and collectively these documents cover all the major species raised on farms across the country. There has been a major effort undertaken to update these Codes of Practice to better reflect today's knowledge, capacities, 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

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. The answer is an emphatic "Yes".

Code Managers are charged with collating all the feedback from the Public Comment Period before organizing and providing this to the Committee members they facilitate.

All the comments received are organized to ensure that they can receive appropriate consideration. This often involves painstaking work to categorize and sub-categorize the comments so they can be accessed and reviewed by the committee as efficiently as possible.

A common reflection from Committee members is how pleased they are with the diversity of people who provide input and how this enhances the final Code. Committee members take great care and time to consider all the viewpoints presented.

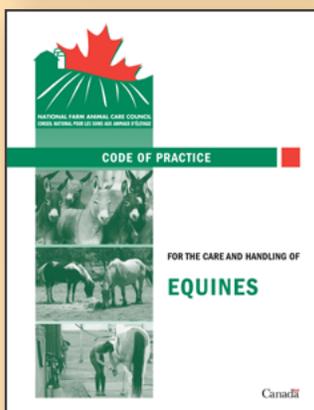
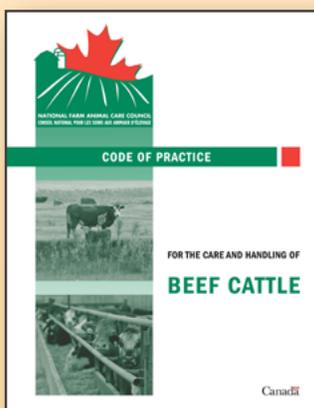
As of 2021 *What We Heard and How We Addressed It* reports are developed to provide insights on how the feedback from the comment period informed the final version of a Code of Practice.

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.

A name and email address must be entered to ensure the integrity of the information and provide a means for contacting an individual if there are questions about their submission. However, names and email addresses are kept in confidence; they are not provided to the Code 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 Committee. 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 and the feedback they provided – is not made public by NFACC.



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

While all constructive comments are helpful, submissions that include alternative wording and references (if applicable) are particularly useful.

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

- **Be constructive.** Criticism is welcome and can be 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 copy and pasted comments can convey a strong message around a particular stakeholder viewpoint and this will be noted by the Code Committee. However, the Committee particularly appreciates submissions that help them to resolve differences and arrive at a quality Code.
- **Be polite.** Submissions that include profanity or derogatory or threatening language will not be considered. There is no 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 new Code of Practice includes several important milestones (See “[Road to the Codes](#)” inset), 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 the Public Comment Period:

Step 1: Dates are determined

Most of the Code process centers on the various stakeholders who make up the Code 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 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 can review the draft Code of Practice and submit their comments.

The draft Code is made available on the NFACC website, at www.nfacc.ca, and a platform is provided for submitting 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 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 are then collected by the Code Manager of the Code Committee. The Code Manager is charged with organizing and providing this information to the Committee in a manner that is most effective. Code Managers will organize information in a logical format, based on considerations such as the volume of comments and what makes sense for the Committee members they are supporting.

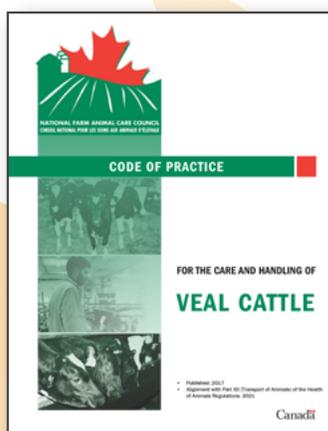
Effort is made to provide the information in a timely fashion following the completion of the Public Comment Period, with the specific timing varying somewhat depending largely on the volume of information the Code Manager is required to organize.

Step 5: Committee reviews comments and determines what changes are 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, some Codes have required additional meetings and effort to achieve consensus.

Once consensus is reached, arrangements are made to revise and finalize the Code as needed before the Code 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 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 Committee’s discussions that led to the original draft Code, as well as all the other feedback submitted.

The final Code is published alongside a report of how the feedback on the draft was considered allowing everyone to see how the comment period informed the final Code.

By the numbers

Multiple Codes of Practice have been completed for different species in recent years.

Each submission to a Public Comment Period from an individual or organization may contain just a few comments on one or two topic areas or dozens of comments across all topic areas of a Code. Here's a rundown of the approximate number of submissions received for several Codes during their respective Public Comment Period.

New or updated Codes

- Dairy cattle (2009) – Approximately 120
- Farmed Mink (2012) – Just under 200
- Farmed fox (2012) – Just over 200
- Equine (2012-2013) – About 600
- Beef cattle (2013) – Approximately 400
- Sheep (2013) – About 200
- Pigs (2013) – Over 4,700
- Rabbits (2017) - 482
- Veal Cattle (2016-2017) - 1000
- Bison (2016-2017) - 110
- Pullets and Laying Hens (2016) - 1900
- Hatching Eggs, Breeders, Chickens, and Turkeys (2015) - 904
- Farmed Salmonids (2020-2021) - 126
- Goats (2021-2021) - 321

Code Amendments

- Farmed Mink amendment (2020-2021) - 1186
- Pigs amendment (2020) - 1122

Road to the Codes

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

1. **Getting started.** Industry group identifies need for Code revision and initiates the process with NFACC.
2. **Building the team.** A Code 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 a consensus-based approach (which can take considerable time and effort) to guide decision-making.
6. **Facilitating public comments.** NFACC makes the draft Code available for a 60-day Public Comment Period.
7. **Final considerations.** Committee members consider and discuss all of the comments received and use this feedback as a basis to determine needed revisions 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.

Watch our short video - "The People Behind the Public Comment Period."



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 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. However, this also represents as a major strength of Canada's Code process. It supports the development of Codes that not only reinforce responsible care and good welfare for farm animals, but are workable and acceptable to a broad and diverse range of stakeholders.

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.

Likewise, the process for Codes development, including the Public Comment Period, continues to be fine-tuned over time based on feedback from the stakeholders involved at all levels. For example, in 2017 NFACC commissioned a [review of its Public Comment Period process](#). This internal review led to further enhancements of the Public Comment Period to support the integrity of the process, along with expanding opportunities for broader input.

Leadership in farm animal care means we must be committed to keep improving in everything we do. 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 expectations in the marketplace.

Funded in part by the Government of Canada under the Canadian Agricultural Partnership's AgriAssurance Program, a federal, provincial, territorial initiative.

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. 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.

