

**NATIONAL FARMED ANIMAL
HEALTH AND WELFARE STRATEGY (NFAHWS)**

Analysis of Consultation Comments

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INDEX

- I STRUCTURE OF THE STRATEGY
 - Vision
 - Strategic Outcomes
 - Governance
 - Structure
 - Implementation

- II IMPLEMENTATION OF THE STRATEGY
 - Priority measurable outcomes
 - Priority action items

- III ADDITIONAL COMMENTS

KEY TO ACRONYMS

AN-CFIA	Animal Welfare – CFIA
APM	Alberta Provincial Meeting
BCPAC	Beef and Cattle Producers Advisory Council
BCPM	British Columbia Provincial Meeting
CAHC	Canadian Animal Health Coalition
CAHCC	Canadian Animal Health Coordinating Committee
CAHI	Canadian Animal Health Institute
CARC	Canadian Agricultural Research Council
CBA	Canadian Bison Association
CBBC	Canadian Beef Breeders Council
CCA	Canadian Cattlemen’s Association
CCQSA	Quebec Provincial Meeting
CFC	Chicken Farmers of Canada
CFHS	Canadian Federation of Humane Societies
CFIA	Canadian Food Inspection Agency
CHEP	Canadian Hatching Egg Producers
CL – OMAFRA	Chong Liu – OMAFRA
CLGA	Canadian Livestock Genetics Association
CLRC	Canadian Livestock Records Corporation
CMBA	Canadian Mink Breeders Association
CMC	Canadian Meat Council
CPC	Canadian Pork Council
CSF	Canadian Sheep Federation
CVMA	Canadian Veterinary Medical Association
DC	Don Crosby
DFC	Dairy Farmers of Canada
DFM	Dairy Farmers of Manitoba
EFC	Egg Farmers of Canada
EM-CFIA	Edward Malek – CFIA
FGM	Federal Government Meeting (CFIA, AAFC, PHAC)
GC	Garry Claassen
GR-CFIA	Gilles Roy – CFIA
JI-AAFC	John Irwin – Agriculture and Agri-Food Canada
JM-CFIA	Jean MacLean – CFIA
JP	Jim Pettit
MPM	Manitoba Provincial Meeting
NB/PEI-T	New Brunswick and Prince Edward Island Teleconference

NFACC	National Farm Animal Care Council
NFU	National Farmers Union
NSPM	Nova Scotia Provincial Meeting
ON	Ole Nielsen
OPIC	Ontario Poultry Industry Council
OPM	Ontario Provincial Meeting
PED 2	Presidents and Executive Directors Meeting (10 March 2009)
PG-CFIA	Penny Greenwood – CFIA
PHAC	Public Health Agency of Canada
PM-PHAC	Pascal Moreau – PHAC
RL	Roy Lewis
SPM	Saskatchewan Provincial Meeting
SVMA	Saskatchewan Veterinary Medical Association
TFC	Turkey Farmers of Canada
UPA	Union des Producteurs Agricole
WSGA	Western Stock Growers Association

STRUCTURE OF THE STRATEGY

Vision

The vision is acceptable and there is support for the NFAHWS since the draft document is considered to be directionally correct

Agree that there needs to be a Strategy for animal health in Canada, and there needs to be an industry-government forum to discuss animal health issues and priorities.

Welcomes the Strategy – a forum is required that the Council provides that.

Vision is consistent with CFIA's own vision, programs, and developing animal welfare strategy

While the vision is valid, it is too ambitious to cover all aspects.

Strategy is too broad and far-reaching – should be narrowed down and priorities established.

There should be three over-riding principles:

- Implementation of the Strategy should be to the financial benefit of farmers
- All industry sectors should have equal access to programs resulting from the Strategy
- The Strategy must not result in a price advantage for imported goods by increasing costs for Canadian farmers

Biggest unknown in the future is leadership and interpretation of decisions – put the Strategy together and continue to develop

Strategy focuses on reportable, infectious diseases rather than on overall animal health

There is a concern that the public doesn't value agriculture

Could be strengthened to reflect global leadership since Canada is a major exporting nation of farmed animals and animal products

There is no measurable in the vision statement – should focus on inspiring and motivating the industry as much as it inspires the general public and trading partners to have confidence in the health of Canadian livestock.

The vision is a value statement – not futuristic and there are no goals. Suggest "All Canadians will value and support. . ."

The vision needs to be more dynamic – Suggest "The vital importance of the farmed animal population to the well-being of people, the environment, and the Canadian economy necessitates that their health, care, and welfare is valued and supported by all Canadians"

"Canada values and supports. . . "implies that presently the Canadian population does not value or support the health It is pretentious

". . . . contributing to the well-being of people, the agricultural industry, the environment . . . "

"Canadians recognize that animal health status is a dynamic contributor to Canada's economic, environmental, and social well-being."

Clarity in wording is required

The name of the Strategy should be "National Farmed Animal Health and Welfare Strategy"

Strategic Outcomes

The Strategic Outcomes are inclusive and cover the scope of the vision

The appropriate level of significance has been placed on the two critical elements of governance and infrastructure

The NFAHWS has the potential to bring consistency to animal health policy and programming

- To anticipate and coordinate future threats
- To increase government-industry collaboration

It is better to work without the constraint of funding now. Having the right strategy in place will help us to determine later what can/cannot be done and/or the order in which issues can be addressed.

Strategic Outcomes should be prioritized and achieved one at a time.

It is more appropriate to place socially oriented Strategic Outcomes before governance and infrastructure

Farmed animal care and welfare should also be categorized with the animal health system and animal health status Strategic Outcomes

There should be something that speaks to working together and resources

Need to work at a higher level and cannot afford to work as individual commodities

The word "improve" is repetitive and implies a constant. Should use something like "continuous improvement"

We disagree that there is an increasing demand for food safety or animal welfare

Although farmed animal care and welfare is one of the Strategic Outcomes, it is not addressed anywhere under governance and infrastructure, and there is no mention of humane treatment of animals anywhere in the Strategy

There should be a Strategic Outcome to develop an overall assessment of farm animal health issues in Canada to determine the greatest causes of reduced welfare, species by species.

To fully assess the Strategic Outcomes, it is necessary:

- To have an action plan complete with allocation of accountabilities
- To address the issue of resources, both human and financial,
- To list the Strategic Outcomes in priority with those related to farmed animals coming first

Clarity in wording is required

Something is missing about societal views on agriculture and the methods of production

No priority has been given to establishing an all-hazard emergency preparation and response system in Canada

We disagree with the description of animal welfare as reflecting societal values

Food safety should be considered as an outcome. Better animal health status does have a direct effect on food safety. Food safety is a big contributor to public health and will create a lot of opportunities for the environment and Canadian economy.

The Strategic Outcomes cover the scope of the vision except for addressing external animal health policies that impact the viability of the Canadian food animal sector e.g. COOL, and foreign acceptance of our zoning policies

Instead of "improve capacity" it should be "maintain capacity"

Strategic Outcome 1 and 2 – Eliminate "anticipate opportunities" and "create opportunities"

Strategic Outcome 4

- Delete the word "public" "Improve confidence . . ."
- Farmers are already high on the trust worthy scale in public's eyes. Therefore why "improve confidence. . . ." Should read ". . . . maintain public confidence and improve public awareness . . ."

Strategic Outcome 5

- "improve market access and sustain existing international and domestic markets."
- Market access should contribute to achievement of global leadership in farmed animal health.
- ". . . . improve international markets and sustain domestic markets."

Strategic Outcome 6

- There is concern with the involvement in the "one health" concept and its impact on industry

Strategic Outcome 7

- Delete "and reflect societal ethics" ". . . by sharing responsibility for farmed animal care and welfare practices that have a basis in science ~~and reflect societal ethics~~"
- This Strategic Outcome addresses animal welfare but there are no specific measurable outcomes or priority actions to address animal welfare issues.
- There is a reluctance to commit to improving the welfare of farmed animals as

expressed by linking improvements in animal welfare to market access and increased return for the producer as well as saying Canada is an international leader in farmed animal care and welfare, which is not right.

- To say “reflect societal ethics: is not clear. Use “an informed. . . “

Strategic Outcome 8 – Should the word used be “profitability” instead of “viability”

Governance

We agree with the role. The most crucial aspect of the Strategy is the ability of government and industry to form a true partnership. We believe that no precedent exists, it is new territory.

Collaborative governance is the most appropriate structure to achieve facilitated consultations and discussions on specific issues considering that the Council is not a decision making body. It should however have an extraordinary voting mechanism if this becomes necessary

We strongly agree that the management of the Council be at arm's length from government organizations to achieve consensus in a collaborative and non-combative process, distanced from political influences

The success of the Strategy is dependent on the essential participation and commitment of federal and provincial/territorial government representatives

Everything depends on trust. The livestock sectors must trust each other.

We need to leverage the trust that has been developed around the CAHC table.

Must be a proper balance of expertise and interests. Participants on Council must have a clear understanding of the vision and the connectivity between the various interests at stake.

We don't want an "omnipotent council" but it must have integrity and trust. Organizations will need to be plugged in at some level. Accountability however will be an issue for government.

An election process would facilitate the development of trust and collaboration. All livestock groups and their respective diseases need to be included.

Industry will need to know who their representative is on Council, and communication at that level is crucial.
Communication and trust are fundamental to making this work. Perhaps it will need a second tier for communication, clarity, and facilitating message delivery

We agree with the composition of the Council

The composition should have provincial CVOs, national CVO, livestock peak bodies, public health, and consumer/societal participants.

Although governance is truly the cornerstone, it has to be taken by a single entity with partners. Many stakeholders would be detrimental to the Council operation.

Should provide the pros and cons of other options.

How to get the right mix with Council members including representation on societal issues. Who will represent the public?

The Council seems heavy with provincial representation

May need Canada's CVO on Council to demonstrate commitment.

Terms of Reference for the Council should include representation or input from CVMA, veterinary schools, animal welfare academics, or animal welfare organizations.

Animal care is not adequately represented on Council.

We do not agree with the composition. It does not acknowledge the unique and key stakeholder role of the veterinary practitioner and veterinary academia. We recommend two representatives from the veterinary community to sit on the Council, as selected by the CVMA in conjunction with the Deans of the five Canadian Veterinary colleges. Private veterinarians are the backbone of animal health, welfare, and surveillance.

Local practitioners are often the first detector. Large animal practitioners, provincial vets, and CFIA vets should end their animosity and recognize that they are on the same side.

This is a major gap in the Strategy. Veterinarians have a valuable partnership with livestock producers leading to enhanced animal health and food safety as well as developing and implementing disease management programs.

Should involve private practitioners not just government vets.

Should have representation from Canadian Association of Bovine Practitioners and from the Veterinary Association of the Province of Quebec.

Where within the Council do allied industries fit?

The required skills for the Council will be found from beef, hog, poultry, equine, and sheep sectors plus a sixth member from alternative livestock. There should be three participants from the provinces and two members selected by all members.

Industry should have six participants with three federal and three provincial participants to be balanced.

Risk analysis should be the driver with a risk analysis expert on the Council.

Should be ad hoc contribution from experts of the CVMA, PHAC, and Association of Deans of Veterinary Colleges.

Council representation should include ecosystem health and wildlife.

Broader representation is needed on the Council including the animal welfare sector, veterinary profession, research community, retailers, and consumers.

Composition of the Council should include representatives from the veterinary profession, wildlife, environment, and aquatic.

The governance is not broad enough. It requires a change of culture and commitment.

To whom would the Council report?

The Council needs a reporting link e.g. general council or assembly. Are all industry and identification organizations involved?

Perhaps the Council could report to the CCVO

If the Council only puts policy ideas forward, it will only be a think tank.

How to ensure a truly collaborative model that is representative of the sector. Senior government management needs to be defined within the model along with agriculture to ensure an understanding of the significance of agriculture to a strong Canadian economy and a sustainable safe food supply.

Must determine the roles and responsibilities and the level of industry and government commitment needed.

Council needs to be developed such that the size and resource demand are limited, and there are a reasonable number of areas that the Council would cover.

Terms of reference must be developed that clearly establish the scope of the Council, and the role and authority of the Council and its members.

Council can not have decision making authority over other organizations, either government or industry, and can only be advisory in nature.

Council must not implement a duplicate policy that currently exists.

Animal welfare is not referenced in any way within governance or infrastructure. It focuses exclusively on disease management. It should be identified that NFACC is an expert advisory body.

Should change the term "governance" to "collaborative governance"

Must balance market access with supply managed industry issues without becoming divisive

Must support smaller commodity sectors

Need a system to feed information to groups which don't have a representative on Council!

Education plays a huge role in governance.

Should substitute the words "would, must, should with "will"

Authority, accountability, and budget need to be kept in the same place.

The Council could be a transfer organization for provincial initiatives across the country.

How to keep the Council from becoming a lobby group?

How to go from a nimble Council to cumbersome government and still keep it moving?

Don't focus on governance. Move forward in short terms.

We have concerns with achieving policy development and formulation.

We question if a yearly meeting would be sufficient at the beginning to establish a satisfactory process for all and to realize progress.

Governance

Implementation

It is too early to develop the Council. We need a consensus that the Strategy is right. Government cannot transfer responsibility to protect consumers. A consensus across the animal agriculture industry will be impossible to achieve.

Insisting on consensus will make decision making slow or impossible.

The Council would primarily act as a priority setting organization for animal health issues in Canada. It could help align priorities and strategies amongst the significant number of Canadian organizations.

There is concern that participants may not park their agendas. This could result in a fragmented, laborious decision making process. The mandate must allow for efficient and effective results.

The Council would not be involved in implementing programs or duplicating strategies or working groups that already exist. Who however will listen and make decisions.

The Council should be an advisory body to government

Should state the principles of Council functioning either in the Strategy and/or in a formalized Terms of Reference.

To ensure viability and long term continuity, the Council would need to sign binding agreements with federal and provincial governments. We would suggest a minimum of ten years with a planned phase-in period of at least five years.

The autonomy of individual organizations must be assured. The Council must not have decision making authority over member organizations.

Responsibility for implementation of strategic components should remain with individual sectors.

A budget must be developed with short term and long term funding, and with appropriate cost sharing amongst participants.

We do not agree with passing off funding requirements to industry

Smaller industry sectors and some provinces will need funding to participate.

The industry, government, academia, and professional associations who designate representatives on the Council should assume financial support for travelling expenses of their members.

On-going sustainable funding for the Strategy is a concern and outstanding issue. There should be a distinction between public good and private good. Perhaps we can redeploy some already existing funding.

The various components must be prioritized with details of costs and funding.

Farmed animal producers need to know the rules and how those rules will affect profitability.

Communication and collaboration are essential. Industry should only pay its fair share.

There must be a financial benefit to producers. There cannot be a price advantage for imported products with lesser standards. The federal and provincial governments must assume the costs to ensure protection of the public.

Need to reduce demands on industry for time and finances to consult and meet.

There is support to a technical level but there are problems with the cost of the process at a senior level.

Government plays a key role in funding.

We must remain competitive with the US.

It must be wealth building.

An enhanced animal health system would be preventative.

We don't want a separated animal health system like the US.

Consumers will only demand what they can afford, and will demand high level services when they move up the wealth scale. The demand for animal welfare is very high on the scale of needs.

Farmers and ranchers will focus on environmental and animal welfare performance when they are not concerned with their immediate economic survival. Therefore improvement of the general and agricultural economics are central to the willingness and ability of Canada to increasingly address animal welfare and environmental challenges and aspirations.

Governance and infrastructure are the most critical elements but have to be cost effective, inclusive, and able to demonstrate policy setting capabilities that result in positive outcomes.

There is a problem in that industry membership is not identified. We should however support the governance model concept first, with details (e.g. membership) to come as next steps.

Must have Terms of Reference for the secretariat.

Can the CAHC be the secretariat?

How will the Council fit within the structure of the CAHS or is the Council a separate entity?

We are not interested in funding both the proposed Council and the CAHC. It would be more effective in terms of time and cost to leverage the working relationship and structure already created with the CAHC.

Can we work with existing structures? Leadership is important.

Do not reinvent the wheel. CFIA and other organizations have made positive contributions to the existing system that need to be recognized.

This is a natural extension of some current federal animal health policies. How will the Strategy tie together with CFIA's procedures and policies? How would the Strategy tie in with the program part of CFIA which helps to develop policies for disease control?

We do not agree that any regulated party would make binding decisions on the government regulation.

At what level between policy and program would the Council be acting?

The Council has too many layers of organization to be nimble.

This has been tried in the past and hasn't worked.

There aren't enough animal health experts to work on national policies.

There is no difference between the role of the Council and current program specialists at CFIA.

This is just a Cadillac version of the existing infrastructure. What is needed is coordination.

Start with smaller chunks like defining the roles and responsibilities for the spectrum of diseases.

There is concern that CFIA will not agree to participate. There is a very low trust level for CFIA.

There is a concern for how to get all players to work together. Buy-in from partners is critical.

The most critical aspects will be political acceptance and communication of the benefits of the Strategy to all stakeholders.

Must ensure that all livestock commodities will be able to address current health issues.

Agree with the establishment of an "Expert Advisory Group"

- Should include controversial experts
- There should be a functional link between the Council and key universities with a significant commitment to animal health (e.g. a dispersed "Institute" of the Council). This would be a primary core of experts accountable to the Council.

Animal health is not as high a profile issue as many other costs of production and market factors unless there is an outbreak.

How will CAHI bring its issues to the Council?

How will the Council function if not all commodity organizations agree to participate?

Must determine how decisions will be made for minor use/minor species.

There is concern with the do-ability of the Council.

There is an economic urgency to move quickly to support industry viability.

How will the Council deal with the clash between science and societal ethics?

Need a lexicon to define policy and program.

The Strategy should be a vehicle for ensuring farmers' concerns and recommendations are brought forward and acted upon.

Council must debrief after emergencies to assist the psychological impacts of disease outbreaks on sectors and staff.

There should be regular updates to all stakeholders on the development of the section plan to implement the Strategy and its various components.

II IMPLEMENTATION OF THE STRATEGY

Priority Measurable Outcomes

We agree with the components of the Strategy but the components should first be prioritized.

We agree with the measurable outcomes for both governance and infrastructure.

Nimbleness of the system will be the ultimate measurable.

We support the listed priority measurable outcomes. Primary focus should be on establishing roles, responsibilities and accountabilities for all significant diseases. Animal welfare and export ability are urgent. Develop a phase-in approach depending on the priorities identified and agreed upon by all parties.

Top five outcomes

- Governance model
- Roles, responsibilities, accountabilities
- Risk management model
- National traceability
- Information sharing agreements

Key priority areas

- Governance, funding, roles/responsibilities, emergency planning, national biosecurity, traceability, national surveillance systems, animal identification, test systems, best practices, farm animal-care, market access, education, transport, zoning.

Priority measurable outcomes are

- Traceability, producer buy-in, financial risk management, national versus regional focus, trust between government and industry leadership capacity and vision, political buy-in.

It is important and necessary that biosecurity is prominent and pre-eminent. No entry to livestock facilities shall be permitted without an owner's permission with regard to biosecurity protocols. A biosecurity kit would be a useful tool.

Zoning cannot and must not be pre-determined.

Priority should be given to new and emerging diseases, their detection and control.

We do not support the principle of single pre-determined zones for all sectors. Effective zones should be based on an individual industry structure and take into account specific disease situations.

Need great care before suggesting an industry-government shared responsibility agreement.

We must not accept that the Strategy be consistent with OIE or Codex

Shocked to see that Canada is recognized as a leader in farmed animal care and welfare. There is no evidence to back up such a statement.

Must change the measurable outcomes of the Regulated Biologics and Pharmaceutical Products component

In Infrastructure, there is no mention of the availability of drugs for use in Canada.

Should include specific measurable outcomes and actions to address emergency preparedness and animal welfare.

The options for future governance require more thinking.

What is the role of the "Expert Advisory Group" and what would be the membership?

Dismayed at the recommendation that NFACC should develop a long term strategy for its own sustainability. We don't believe that NFACC is the answer to addressing farm animal welfare in Canada.

Avoid duplication.

For identification and traceability it should be added that traceability can also be achieved through individual flock identification.

Governance on Page 14

"policy development includes and addresses the environment, wildlife, human and animal health. Perhaps should also include animal welfare.

Infrastructure on Page 15 requires an additional bullet "a comprehensive and competitive pre and post approved regulatory program for animal health products needs to be in place to ensure availability of animal health products in support of animal well-being, food safety, and producer competitiveness.

There must be more attention to communication of the Strategy and its outcomes. Possibly there should be an outcome that reflects industry and consumer knowledge of the Strategy and its contribution to safe food domestically and internationally.

It is recommended that the measurable outcomes be divided into short and long term outcomes.

Improving rural veterinary practices should be addressed as a priority.

Priority measurable outcomes in governance need to be achieved prior to 2015
Developing, negotiating, and finalizing an agreement needs to be made a priority.

We have a concern that the priorities will not provide an incentive at the producer level.

The diagnostic laboratories must be maintained.

Licensing and veterinary medical education requirements are too far down the list.

It is of critical importance that the economic interests of the family farmer, the interest of the public, the protection of the environment, and the well-being of farmed animals be top priorities.

The agri-intelligence system should be a physical entity.

Trade interests are important but they must be viewed in context.

A gap analysis is needed to establish priorities

Disposal is a major factor in disease outbreaks.

Priority should be given to delivering information to stakeholders including producers.

We want to see a catastrophe loss insurance program implemented.

Priority Action Items

Council should be created and running with the governance structure.

We need the Council up and running to show value and leadership.

The first steps are establishment of the governance model and building the infrastructure, then actions and priorities can be established by the Council

The way of the past doesn't work.

For some it doesn't go far enough (e.g. doesn't have authority) but we are trying first steps.

The current system is not broken, but a new and better option is required for increased engagement.

The action items should be prioritized.

What are the gaps that should be addressed?

We need a budget to discuss. We need the funding model soon for boards to consider in their budget process. We are not sure of the finance because there is no authority.

It needs a detailed budget listing estimated costs and potential funding for all aspects of the Strategy, including funding for the Council.

We must have an action plan.

We must determine what surveillance will cover before it is activated.

Information sharing should be at the top of the list.

To realize information sharing, we must build a national farmed animal health database.

We are not structuring the organization to develop, negotiate, and conclude the agreement on diseases. To do this we need all the players at the table. The role of the Council is to advise.

There is concern that other trading partners are moving ahead.

The Council needs to facilitate disease responsibility.

It can't take too long to fix the current system, but it may require small steps to achieve the optimum.

We are not sure of the function of the Steering Committee.

Communication links must be established.

A reporting process is required to demonstrate value with strategic level communication.

We need to reprioritize our role as industry leadership.

The process is difficult for "action people"

The CAHC is not taking on the big issue.

The main areas of research should not be outlined. This should include an action item for technology transfer to industry.

Under Infrastructure on page 15 there should be an additional bullet "build on the work of the Canadian Animal Health Product Regulatory Advisory Committee to ensure effective collaboration in ensuring competitive animal health product regulatory programs."

The recommendations for action of the Regulated Biologics and Pharmaceutical Products component should be changed.

Canada's existing farmed animal welfare infrastructure can be incorporated into the NFAHWS at an early stage.

Under the Financial Risk Management component, consider not only disease risk management but also trade risk associated with animal welfare standards and incidents.

Endorsement is offered for the use of foresight technology in the Strategy Renewal process.

Research should have a mechanism to extend research results back into the livestock community, government and academia.

Top five action items

- Collaborative governance model has been established
- Roles, responsibilities, and accountabilities have been established
- Integrated national information sharing agreements have been established and are functional
- Multi-dimensional teams and networks are established for identification, analysis, and evaluation of hazards and threats
- A farmed animal health services delivery model is capable of meeting the NFAHWS needs.

- Finalization and acceptance of the Strategy
- Identification and prioritization of current issues and development of an action plan
- Clarification of the funding formula
- Creation of the Council
- Creation of the “Expert Advisory Group”

- Finalization and acceptance of the Strategy by the ADMs
- Creation of the Council
- Creation of the “Expert Advisory Group”
- Identification and prioritization of current issues
- Clarification of the funding formula

- Appoint a steering committee to form the Council
- Form the Council including the veterinary community
- Establish an independent secretariat
- Establish the collaborative governance model
- Establish roles, responsibilities, and accountabilities for all significant diseases and animal welfare issues of farmed animals amongst the major stakeholders including the veterinary community.

- National integrated surveillance system that incorporates zoning as a priority tool
- National traceability system
- Expert teams, for the identification, analysis, and evaluation of hazards and threats to animal and human health
- Targeted planning and recommended steps to ensure timely recovery from animal infectious diseases with an efficient mechanism for the timely identification of emerging threats and coordinated research.
- Priority to a “Made in Canada” approach to animal welfare with rapid renewal of Codes.

- A national integrated surveillance system.
- An integrated national laboratory diagnostic network.
- The collaborative governance model.
- Roles and responsibilities for all stakeholders.
- Anticipation teams are established to monitor emerging hazards and threats.

Priority Action

- “develop, negotiate, and conclude an agreement amongst the farmed animal sector, *the veterinary community*, the federal government and the provincial/territorial governments for the shared responsibility, management, and funding of all significant diseases *and animal welfare issues* of the farmed animal sector.”

III ADDITIONAL COMMENTS

It is critical that the NFAHWS go forward whether the NAHS is ready or not. It is time to take action.

This is an important statement and a definite step in the right direction in terms of managing and responding to animal health challenges.

We are very supportive of the draft NFAHWS as a comprehensive forward thinking document that crystallizes the necessary scope and clarifies the participation of stakeholders.

This is a good job in putting together a suggested approach for starting the process of improving our animal health programs in Canada. I hope that the powers that be are not asleep at the switch but start to follow the recommendations and timelines as laid out.

The concept is great and worth pursuing, More discussion and consultation is needed. Some minor unregulated groups will express concerns about their needs being met.

Compliments should be given on the speed of producing the draft Strategy.

Provincial governments and the federal government must work together.

No priority has been given to establishing an all-hazards emergency preparedness and response system in Canada with capabilities to match the importance and value of the farmed animal sector.

There is concern that farmed animal welfare disappears from the Strategy when priority issues are mentioned. We suggest incorporating it into the actions for governance.

Recognition should be given to the development of new industry insurance programs.

We question the adequacy of compensation.

The Strategy has been written for experts. It needs to be rewritten for ADMs