



**ANIMAL  
ALLIANCE**  
OF CANADA

*Animal  
Protection  
Through  
Education &  
Advocacy*



[www.humanefood.ca](http://www.humanefood.ca)

July 6, 2009

Mr. Doug Popowich  
Fire Commissioner  
Manitoba Office of the Fire Commissioner  
508–401 York Avenue  
Winnipeg, MB R3C 0P8

BY MAIL and FAX

Dear Mr. Popowich:

### **Re: Regulation of Farm Buildings in Manitoba**

In May we wrote to you, outlining recommendations for fire prevention in farm buildings across Canada, including—as a minimum—requirements for sprinklers and smoke alarms. Attached is a copy of our May 6, 2009 letter.

Now we are writing in response to the *Discussion Paper on the Regulation of Farm Buildings* in Manitoba. It is a positive move by the province to require farm buildings to be designed and constructed to meet building codes—particularly in light of the horrific barn fires in Manitoba in 2008 when more than 30,000 pigs died.

Improved standards in farm buildings are needed for all concerned: the thousands of trapped animals who cannot escape these infernos and the emotional toll on emergency responders who battle barn fires.

We urge **stringent prevention regulations for both new and existing farm buildings**. If existing farm buildings are not included under the revised farm building code, significant opportunities for a safer environment will be lost. With the moratorium on new hog facilities in much of Manitoba, very few hog operations will be covered under the proposed farm building code.

To facilitate retrofitting of existing farm buildings we urge you to require municipalities to introduce **ordinances** to require retrofittings. The local ordinance is a useful tool to provide a higher level of safety to the community, lessening the loss of life and property damage. Such ordinances have the full weight and authority as any other law.

We do not understand why farm buildings do not come under F1 (high hazard industrial). Animals are highly combustible and flammable and constitute a special fire hazard, with thousands of lives at stake.

Of the two recommended options (F2 and F3), we support F2, since it offers stronger fire prevention measures, including:

- sprinklers (but not for facilities of less than **1000m<sup>2</sup>**);
- firewalls separating buildings (**4 hour**, with **3 hour doors** if any openings); and
- attic spaces to be stopped every 300m<sup>2</sup>, if combustible construction.

221 Broadview Ave.  
Suite 101, Toronto  
Ontario, Canada  
M4M 2G3

Phone  
416.462.9541

Fax  
416.462.9647

E-mail  
Contact@AnimalAlliance.ca

Website  
[www.AnimalAlliance.ca](http://www.AnimalAlliance.ca)



We **support** these requirements under F2:

- 1) attic spaces to be stopped every 300m<sup>2</sup>
- 2) flame spread rating of walls/ceiling not to exceed 150
- 3) maximum travel distance to exit of 30 m
- 4) requirement for structural, electrical and mechanical plans to be signed by a professional engineer
- 5) total combustible content is more than 50kg/sq m, and
- 6) an emergency plan.

We urge you to require that **every building which houses 50 or more animals be subject to F2 requirements to include sprinklers and fire alarms**, regardless of building size or employee numbers.

We **cannot support excluding a fire alarm system because there are fewer than 75 employees** (as is the case with farm operations). Human presence should not be the sole criterion for an alarm system when it is virtually impossible to rescue confined farm animals during fires. **Sprinklers and fire alarm systems are needed in farm buildings** with 50 or more animals, irrespective of employee numbers or building size.

Animal lives—often multi-thousands per facility—are at stake. Animals spend their lives in these facilities 100% of the time. They require proper fire protection. Strong, effective fire prevention standards, including sprinklers and fire alarms, make buildings **safer for employees** and better protect **economic investment**. An effective fire prevention system is a cost of doing business.

We feel very strongly about these issues! We urge you to read the enclosed letter dated May 6, 2009, and to consider the recommendations contained within.

We respectfully request opportunity to **meet with you in Winnipeg** to discuss the regulations of farm buildings in Manitoba.

Thank you for your attention.

Sincerely,



Liz White  
**Animal Alliance of Canada**  
**416-462-9541 ext: 23**



Stephanie Brown  
**Canadian Coalition for Farm Animals**  
**416-920-4984**

Attached: May 6, 2009 letter to provincial fire chiefs and commissioners



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Chair and Members  
Standing Committee on Fire Protection  
Canadian Codes Centre, Institute for Research in Construction  
National Research Council Canada, Building M-23A  
1200 Montreal Road  
Ottawa, ON K1A 0R6



Dear Sirs and Mesdames:

**Re: Farm Building Code of Canada – 1995 (NFBC)**

Livestock operations in Canada are growing increasingly large, with ever larger numbers of animals and economic value.

Within the past several years there has been a rash of serious barn fires in Canada, causing massive loss of animal life, particularly in intensive livestock confinement operations (ILCOs). For example, more than 30,000 pigs died in Manitoba in 2008 alone—an eight-fold increase over 2007 (*Winnipeg Free Press*, January 2, 2009). In addition to lost animal lives, there are significant economic losses.

See Appendix I for a list of recent barn fires in Canada, including numbers of animal lives lost and economic loss

See Appendix II for economic data, 2004-2007: Millions of dollars lost in barn fires, Ontario.

The national standard for farm building construction (Farm Building Code of Canada –1995) contains minimum requirements and does not adequately protect animal lives, as evidenced in Appendix I. The standard does not require either sprinklers or smoke alarms for buildings with not more than one person occupancy per 40 square metres. Changes to the Farm Building Code of Canada are needed to strengthen it.

There are thousands of commercial farm buildings in Canada, many of which house many thousands of animals. In many ILCOs, animals are confined in cages and crates. These animals can not be rescued when fire breaks out.

**Fire prevention** is key to minimizing the *potential* for fires in farm buildings. Practical measures to minimize risk include smoke alarms, sprinklers and fire-retardant paint, yet these measures are not currently mandated. In addition, fire-stopping measures in barn attics are needed to help prevent spread of a fire within a structure. Farm building owners and managers need to ensure wiring is up to code, not allow smoking, ensure heaters and electrical devices are inspected, and ensure hay storage is well ventilated and whenever possible heated in a different building. Schedule emergency fire drills and conduct annual inspections of safety equipment. Portable fire extinguishers approved for use in all climates should be mounted outside each exit door, with training for all employees in the equipment.

221 Broadview Ave.  
Suite 101, Toronto  
Ontario, Canada  
M4M 2G3

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www.AnimalAlliance.ca



Laurie Loveman, a 20+ year member of the fire service, and advocate for fire safety in barns ([www.firesafetyinbarns.com](http://www.firesafetyinbarns.com)), has been tracking barn fires in North America for several years. (Her information about barn fires in Canada is the basis for Appendix I, attached.) She describes the impossibility of saving animals—already compromised by breathing ammonia-laden air—so carbon monoxide, among other toxins produced by combustion, quickly kills them. With so many animals in farm buildings and too few employees to even attempt evacuation, the only means of saving lives is by sprinkler systems and doing away with large-scale ILCOs. Given that most intensive operations have automated watering systems, the basic infrastructure is already in place to allow for the construction of a sprinkler system, including existing barns.

From the fire fighter's perspective, the sounds and smells of burning animals take such an emotional toll that some fire fighters require grief counselling from the trauma of seeing, hearing and smelling the animals' injuries and deaths.

### **What is needed**

The NFBC is a guide to **minimum** requirements for farm building construction in Canada. Higher fire standards for farm buildings are needed to better protect the lives of farm animals in Canada, especially those in intensive confinement operations where thousands of animals are in close proximity to one another.

We request changes to the Farm Building Code of Canada–1995 to include:

- 1) Changes to the building code** to require all new commercial farm buildings housing animals to include sprinklers, smoke and heat alarms and alarms to detect ventilation failures; use of non-toxic, non-carcinogenic fire retardants on wood surfaces; fire-stopping measures for farm building attics (if present), and mandatory inspections by the local fire chief.
- 2) Retrofitting of existing commercial farm buildings** which house animal populations to include sprinklers, smoke and heat alarms and alarms to detect ventilation failures, use of non-toxic, non-carcinogenic fire retardants on wood surfaces; fire-stopping measures for farm building attics (if present), and mandatory inspections by the local fire chief.
- 3) Capital costs** associated with implementing the above fire-prevention measures should be tax deductible.

We request the opportunity to meet with you and members of the Standing Committee on Fire Protection to discuss this issue first hand. Please contact us at your earliest convenience to establish a suitable date to meet.

Sincerely,



Liz White, Director  
**Animal Alliance of Canada**  
416-462-9541 ext. 24



Stephanie Brown, Director  
**Canadian Coalition for Farm Animals**  
416-920-4984

Att.s Appendices I and II

cc:

Association of Fire Chiefs  
Department of Public Safety, Office of the Fire Marshal New Brunswick  
Public Safety and Office of the Fire Marshal, Nova Scotia  
Ministry of Community Safety and Correctional Services, Office of the Fire Marshal, Ontario  
Fire Marshal's Office, Office of Public Safety, Prince Edward Island  
Yukon Fire Marshal  
Fire Marshal, Municipal and Community Affairs, Northwest Territories  
Ministère de la Sécurité publique, Quebec  
Fire Commissioner, Ministry of Public Safety & Solicitor General, British Columbia  
Fire Commissioner, Manitoba Labour  
Acting Fire Marshal, Dept. of Community & Government Service, Nunavut  
Fire Commissioner, Alberta Municipal Affairs  
Fire Commissioner / Director, Building and Fire Safety Unit, Saskatchewan  
Fire Commissioner & Director of NLEMO, Municipal & Provincial Affairs, Newfoundland  
Ontario Ministry of Agriculture, Food and Rural Affairs  
Canadian Farm Builders Association  
Canadian Agricultural Safety Association  
BC Pork  
Alberta Pork  
Sask Pork  
Manitoba Pork Council  
Ontario Pork  
Fédération des producteurs de porcs du Québec  
Porc NB Pork  
PEI Pork  
Pork Nova Scotia  
Canadian Pork Council  
Dairy Farmers of Canada  
Chicken Farmers of Canada  
Turkey Farmers of Canada  
National Farm Animal Care Council  
Ontario Farmer  
Manitoba Cooperator  
Alberta Farmer  
Canadian Poultry Magazine  
Better Farming  
Western Hog Journal  
Pork News and Views [ag.info.omafra@ontario.ca](mailto:ag.info.omafra@ontario.ca)