



*Canadians for
Ethical Treatment of Food Animals*

Mr. Douglas Popowich
Fire Commissioner
Office of the Fire Commissioner
508-401 York Avenue
Winnipeg, Manitoba R3C 0P8

July 7, 2009

Dear Commissioner Popowich,

Thank you for your efforts to have barns in Manitoba included under *The Buildings and Mobile Homes Act* so that building code requirements will apply to the construction of these buildings as well.

We are writing to provide our written submission and comments on our many concerns with the proposed classification for barns, namely F2 or F3. Our primary concern is that neither of these categorizations accurately reflects the true nature of these facilities which, as you've stated in interviews yourself, are more like factories housing thousands of animals, than small, traditional structures that barns once were.

The standard for whether to require even a fire alarm under these categorizations is based on human occupancy, which you've indicated in your letter to stakeholders, is low in these facilities as most are computerized and automatic and do not require many workers. However, the up to 5,000 animals or 25,000 birds (as we've just seen with the chicken barn fire east of Steinbach on Tuesday) are given no acknowledgement or consideration.

Because of the massive amounts of waste and excrement, which in the case of pigs at least, contains hydrogen sulphide – which is flammable; and methane – which is highly flammable and explosive, these facilities should rightly be categorized as **F1 – High Hazard industrial** (Group F, Division 1). Only then would the facilities be accurately categorized.

Our second major concern is that existing barns will be grandfathered and not required to comply with the new standards, should they even be passed. This is unacceptable as it is these facilities that are continually going up in flames. In just over one week, Manitobans have seen nearly 35,000 animals burn alive! In the last 18 months, over 52,000 have been burned alive. This is clearly unacceptable and given past experience will only continue if measures are not put in place to ensure they don't.

All existing barns MUST BE REQUIRED to retrofit smoke, fire and ventilation shut-off alarms. They must also be required to install sprinkler systems, as this is the only way to ensure the fires that continue to happen, although they are highly preventable, can be suppressed. Because these barns are so industrialized and generally have automatic watering lines already in existence, sprinklers could simply be tapped into them, reducing the cost.

An article by Laura Rance in last week's Winnipeg Free Press calculated that each and every pig farmer in Manitoba had received \$100,000 to nearly \$300,000 in government bail-out funding. Surely some of this could be put towards protecting their remaining investments. It's the humane and logical thing to do.

Sincerely,

Twyla Francois
Head of Investigation

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