



September 3, 2026

Canadian Food Inspection Agency
1400 Merivale Road
Ottawa, Ontario
K1A 0Y9

Sent via email: cfia.BSE_EFB_consult-ESB_IRAB_consulter.acia@inspection.gc.ca

To whom it may concern,

Re: Canada Gazette I Part I, Volume 160, Number 28: Regulations amending Certain Regulations Relating to Harmonization of the Enhanced Feed Ban

Beef Farmers of Ontario (BFO) appreciates the opportunity to provide comments on the proposed regulatory amendments published in Canada Gazette, Part I, concerning the harmonization of Canada's enhanced feed ban requirements.

BFO represents approximately 19,000 beef farmers across Ontario. The proposed changes are important to Ontario's cattle sector because they recognize the significant progress Canada has made in managing Bovine Spongiform Encephalopathy (BSE) while providing an opportunity to reduce unnecessary regulatory costs and recover value from materials that are currently required to be destroyed.

BFO strongly supports the proposed amendments and believes they represent a sensible, science-based approach to maintaining Canada's strong BSE protections while improving the competitiveness of the Canadian beef industry.

Maintaining Strong BSE Protections While Reducing Unnecessary Burden

Canada's enhanced feed ban has played an important role in controlling BSE and protecting both animal and human health. When these requirements were introduced, they were appropriate given the prevalence and understanding of BSE at the time.

The circumstances have changed significantly. The last case of classical BSE in Canada was detected in 2015, in an animal born in 2009, and classical BSE has declined globally to near zero. Canada has been recognized by the World Organisation for Animal Health (WOAH) as having a negligible BSE risk status since 2021. Canada also maintains a number of other important safeguards, including the longstanding feed ban preventing mammalian protein from being fed to ruminants and a national BSE surveillance program.

BFO therefore supports bringing the regulatory framework more closely in line with the current level of risk. Reducing regulatory requirements where the science demonstrates that the risk remains negligible is an important step toward ensuring that Canadian producers and processors can remain competitive.

Improving the Competitiveness of Canada's Beef Processing Sector

For nearly two decades, Canadian slaughter facilities have been required to dispose of substantially more specified risk material (SRM) than facilities operating in the United States. These requirements create significant costs for Canada's processing sector and ultimately affect the competitiveness of the entire cattle industry.

The proposed changes would allow eligible SRM to be redirected into approved non-ruminant feed, fertilizer and pet food pathways rather than requiring it to be destroyed. This creates an opportunity to recover value from material that is currently treated as waste while reducing disposal costs.

The benefits should extend beyond individual slaughter facilities. A financially healthy and competitive processing sector is essential to Ontario beef farmers. Canada's packing industry is highly concentrated, and maintaining a strong domestic processing capacity is important to preserving competition and ensuring Ontario producers have reliable market access. Reducing unnecessary costs at the processing level can therefore contribute to a stronger and more resilient cattle value chain.

A Science-Based and Risk-Proportionate Approach

BFO supports the proposed approach because it is based on the current scientific understanding of BSE risk and does not introduce new pathways for exposure through food.

The proposed framework would bring Canada's treatment of eligible SRM more closely into alignment with the approach used in the United States. This is particularly important from a competitiveness perspective, while maintaining the safeguards necessary to protect Canada's animal health and food safety status.

BFO recognizes the work undertaken by the Canadian Food Inspection Agency, Health Canada and the Public Health Agency of Canada in assessing the risks associated with these changes. The scientific and risk assessments supporting the proposal provide confidence that allowing lower-risk SRM to enter approved secondary uses will not compromise Canada's BSE status.

Canada's continued commitment to surveillance and other BSE controls will remain critical. Regulatory modernization should not mean abandoning safeguards; rather, it should ensure those safeguards are proportionate to the actual risk.

No Change to Food Safety Protections

BFO supports maintaining the existing prohibition on SRM entering the human food supply. The proposed amendments are focused on how eligible materials are handled after they have been

removed from the food chain. BFO supports the distinction between food safety requirements and the subsequent management or utilization of eligible SRM.

We encourage the federal government to continue reviewing BSE-related policies as the science and risk environment evolve. Where requirements can be modernized without compromising food safety or animal health, there should be a willingness to reduce regulatory burden.

Implementation Must Be Practical for Slaughter Facilities

While BFO supports the overall proposed regulatory direction, we do question the need for permits on certain eligible SRM materials. Canada should mirror what is required or permitted in the United States rather than add additional burden and regulatory requirements that could reduce the benefits and value of these changes.

BFO also recognizes the potential for the proposed framework to become unnecessarily complicated. The distinction between higher-risk SRM that must continue to be destroyed, eligible SRM that may be directed to secondary uses subject to a permit, and materials that can enter those pathways without a permit needs to be clear and straightforward for industry to understand.

The objective should be a regulatory system that reflects the underlying risk rather than creating additional administrative complexity. BFO therefore encourages CFIA to look for opportunities to simplify the framework wherever possible while maintaining the necessary animal health and food safety protections.

BFO also encourages continued consultation with industry as the detailed policies, guidance and implementation requirements are developed.

Benefits Across the Cattle Value Chain

BFO believes these changes have the potential to benefit the Ontario producers and processors as part of a broader effort to improve the competitiveness and resilience of the Canadian cattle sector.

Reducing unnecessary costs in processing, improving the ability to recover value from cattle, and maintaining a competitive domestic packing industry all contribute to a stronger market for Ontario cattle.

Importantly, the proposed changes do not impose additional requirements on beef producers. Instead, they provide an opportunity to reduce regulatory burden further down the value chain while maintaining the safeguards that have successfully controlled BSE in Canada, notwithstanding our previous comments and opposition to permits.

In conclusion, BFO supports the proposed amendments with the exception of the permit requirement for some SRM products.

BFO encourages the Government of Canada to amend the proposal by removing the permit requirements and then to proceed toward publication in Canada Gazette, Part II as efficiently as

possible. The success of these changes will depend not only on the regulation itself, but on ensuring that the resulting framework is practical, proportionate to risk and accessible to slaughter facilities.

BFO appreciates the federal government's efforts to modernize Canada's BSE regulatory framework and looks forward to continuing to work with CFIA and other federal partners to support a competitive and sustainable Canadian cattle sector.

Sincerely,

A handwritten signature in dark ink, appearing to be 'J. Leblond', with a long horizontal stroke extending to the right.

Jason Leblond
President