



December 3rd, 2021

Michael Richardson
Food Safety and Environmental Policy Branch
1 Stone Road West
Ontario Government Building, 2nd floor, Southwest
Guelph, ON
N1G 4Y2
Canada

Dear Michael,

Re: ERO 019-4499 Prescribing a market disruption within the definition of “hazard” and updating appendices listing notifiable hazards in O. Reg. 277/12 (Reporting of Hazards and Findings) under the Animal Health Act, 2009.

Beef Farmers of Ontario (BFO) appreciates the opportunity to comment on *ERO 019-4499 Prescribing a market disruption within the definition of “hazard” and updating appendices listing notifiable hazards in O. Reg. 277/12 under the Animal Health Act*. BFO represents 19,000 beef farmers in Ontario by advocating in the areas of sustainability, animal health and care, environment, food safety, and domestic and export market development.

BFO is supportive of the Ministry of Agriculture, Food and Rural Affairs’ proposed changes to the definition of a “hazard” under the *Animal Health Act* that relates to prescribing a provincial surplus of livestock or poultry due to a border-related disruption to the market. Specifically, border-related disruptions imposed by the detection or suspicion of a federally reportable disease or other hazard. We support efforts to clarify the authorities in the Act responsible for addressing the disruption, and we support the clarification that in the event of such a disruption, the government would first seek to work with industry to address the disruption and use of any authorities under the Act as a last resort.

The proposed updates to the appendices listing notifiable hazards and OMAFRA’s efforts to allow the province to respond more quickly and effectively to hazards to reduce the impact on animal and human health are smart steps to make and BFO is supportive of these proposed changes.

In addition to our support of the proposed changes, we would also like to provide comments on the importance of the AgriRecovery Beef Emergency Feed Maintenance Initiative, better known as the beef cattle set-aside program, as a tool that can help alleviate pressures caused by a surplus of livestock due to a border-related disruption. The federal and provincial support for and action taken to implement the beef cattle set-aside program last year to help our sector manage cattle backlogs caused by COVID-19 related slowdowns in our processing sector were crucial and greatly appreciated. With the beef cattle set-aside program triggered in December 2020, the program provided an important mitigation tool for processing disruptions.



Earlier in the year, BFO was extremely appreciative of the provincial and federal governments commitment to extend access for Ontario's beef farmers to the beef cattle set-aside program. BFO has continued to advocate that this program should become a permanent tool to help mitigate supply chain disruptions. Plant floods, fires, human or animal disease outbreaks, and labour-force stoppages could be better managed with access to this tool. The beef cattle set-aside program would serve as an important tool in the event that there is a surplus of livestock as a result of a border-related closure or disruption.

On behalf of BFO, thank you for the opportunity to provide feedback on the proposed amendments to O. Reg. 277/12 under the *Animal Health Act*.

Sincerely,

A handwritten signature in dark ink, reading "Rob Lipsett", enclosed within a thin black rectangular border.

Rob Lipsett
President

