



2020 RESOLUTION RESPONSES

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20-01
Processing Capacity Shortage

August 14, 2020

Kim Sytsma
President
Leeds County Cattlemen's Association

Dear Kim,

The following resolution was passed at the Beef Farmers of Ontario (BFO) annual general meeting in February and was recently discussed by the BFO Board of Directors:

WHEREAS, the beef industry in Ontario has insufficient kill capacity and faces an increasing backlog of animals in the supply chain,
THEREFORE, BE IT RESOLVED THAT BFO'S primary focus in 2020 be to investigate, co-ordinate and develop viable strategies to deal with the insufficient slaughter capacity.

Lack of sufficient processing capacity at both the local and provincial/regional level is one the most limiting factors to a healthy competitive market in Ontario and across eastern Canada. We share membership's concerns with the growing trend of processing backlogs during peak periods of the year at our federal plants and long wait times to access local slaughter at many of our provincial plants. The current processing environment has led to lost market opportunity and depressed market prices. The loss of the Ryding-Regency plant in late 2019 and closures to some of our provincial plants have further exasperated the issue.

Processing capacity has been one of BFO's top priorities for close to two years. Some of the actions that have been taken in the past year include:

- Creation of a Processing Capacity Working Group with the Canadian Cattlemen's Association (CCA).
- Engaging with Dairy Farmers of Ontario, Dairy Farmers of Canada, National Cattle Feeders Association, Canadian Meat Council, Ontario Federation of Agriculture, Meat and Poultry Ontario and Veal Farmers of Ontario.
- Discussions with the major federal packers in eastern Canada and the northeastern U.S.
- BFO sponsored a motion at the Beef Value Chain Roundtable calling for Minister Bibeau to develop immediate solutions to help solve the crisis.
- Motion at CCA's Domestic Agriculture Committee calling for immediate government support.
- Letter-writing campaign to MPs.



- Joint call to action between BFO and the Quebec Beef Producers.
- Social media campaign, letters to the editor, and advertising targeting MPs and their political staff.
- Dozens of meetings with key officials, including Ontario and Canada agriculture ministers.
- Joint calls for government support from BFO, CCA and Meat and Poultry Ontario to assist processors modernize and expand production, which helped push governments toward several processor-focused support programs that have been announced over the last year.
- Request for an extension to the Emergency Processing Fund in collaboration with Meat and Poultry Ontario.

The COVID-19 pandemic has led to additional capacity issues at plants across North America due to COVID-19 outbreaks. While Ontario beef plants have fortunately been able to remain open, closures elsewhere in Canada and the U.S. have created ripple effects in the eastern Canadian market. As a result, federal and provincial governments initiated an AgriRecovery disaster program at industry's request for the creation of a cattle set-aside program, which would help pace the supply of cattle when backlogs occur. BFO has provided program design recommendations to the Ontario government, and we expect program details to be announced soon.

Although the set-aside will not resolve longstanding processing capacity issues, it will be a useful tool to have available if COVID-induced backlogs occur at any of our larger plants over the remainder of the 2020 fiscal year. On the provincial side, we hope many local processors will consider accessing one of the existing government support programs, such as the Emergency Processing Fund, to help increase their production, efficiency and access to labour. BFO will continue to promote the need for additional assistance in this area once these programs reach full subscription, or when funding ends.

The processing capacity challenges in Ontario also expand beyond COVID and require long-term solutions. One significant factor that limits export opportunities of live cattle to the U.S. for slaughter is Canada's current BSE status. We are pleased to report that the application to the OIE has been submitted ahead of schedule. We expect a decision in 2021, which should provide additional bidders in the Ontario market, reduce pressure on our current processing system, and improve the competitiveness of fed cattle in Ontario and across the east.

Access to labour is also a limiting factor to growth in the packing sector. BFO and our allies in the livestock and meat packing sectors across Canada have strongly supported the federal Agri-Food Immigration Pilot to bring meat processing workers and farm labourers to Canada to fill critical labour gaps in the domestic market. The roll-out of this program has been slowed significantly by COVID, but once implemented, this program will give processors much-needed additional access to labour.

Ryding-Regency represented 10 to 12 per cent of all federally inspected cattle processed in Ontario, and the loss of their license was a blow to an already stressed system. BFO and CCA were in regular contact with CFIA, AAFC, OMAFRA and management at the facility throughout the suspension. It has been promising to hear that there is movement towards a new license being issued at the same facility. Renewed operations at the facility, if a licence is granted by CFIA, will add additional processing capacity for our market.

In summary, BFO is committed to continuing to support and work on initiatives and strategies to increase beef processing capacity in Ontario, alongside other associations that support this cause. We will continue to keep the county/district associations informed as we work on this important issue.



Thank you for bringing this resolution forward.

Sincerely,

A handwritten signature in black ink that reads "Rob Lipsett". The signature is written in a cursive, flowing style.

Rob Lipsett
President

cc: BFO Board of Directors
Leslie Welch (Advisory Councillor)
Eleanor Renaud (Secunder)
Joe Wilson (Ottawa)
Reg Campbell (Ottawa)





October 26, 2020

Scott MacDonald
President, Bruce County Beef Farmers

20-02
CFIA Enforcement
Consistency

Dear Scott,

The following resolution was passed at the Beef Farmers of Ontario (BFO) annual general meeting in February:

WHEREAS, CFIA is vital to Canada's superior food safety by responding to food risk that may occur and by bringing procedures into effect to uphold the safety of our food, and
WHEREAS, by their own words, giving consistent and efficient inspections that apply nationally in a fair and predictable manner is key, and
WHEREAS, many businesses, be it livestock sales barns, feedlots bringing cattle into packing plants, the packing plants themselves, and small butcher shops, have found extreme inconsistencies from one inspector to the next, and
WHEREAS, this has been the cause of extreme mental stress, financial hardship for businesses, and even closure for those not able to comply,
THEREFORE, BE IT RESOLVED THAT BFO lobby CFIA and the federal government to make sure procedures and requirements are the same from inspector to inspector, and that BFO has input as to the training and prerequisites necessary for these inspectors.

I would like to thank Bruce County Beef Farmers for bringing this resolution forward. BFO shares the concerns raised in this resolution. In response, BFO has pursued a number of actions to improve the consistency of both CFIA and OMAFRA meat inspection and transport enforcement, beginning with the creation of the CFIA-OMAFRA-Industry Animal Transport Working Group in 2017. BFO Director, Dan Darling represents BFO on this Working Group, which meets twice annually.

The following recommendations have been made by BFO to CFIA:

- That the CFIA extend an invitation to all livestock groups, transporters, auctions, feedlots and processors to participate in the CFIA's Humane Transportation Program training. We further request that the CFIA makes its inspector training materials available to industry.
- That an independent appeals committee under the Canada Agricultural Review Tribunal (CART) that is representative of a cross-section of stakeholders and industry experts be appointed to review all *AMP Act* appeals. A model similar to the Ontario Ministry of Agriculture, Food and Rural Affairs Appeal Tribunal, which is comprised of a multidisciplinary panel with



representation from the CFIA, Agriculture and Agri-Food Canada, private veterinarians, transportation specialists and academic researchers, would be appropriate.

- That the limitation period to commence enforcement of Administrative Monetary Penalties (AMPs) be shortened from two-years to six-months.
- That greater emphasis be placed on the opinion of the private veterinarian prior to transport and greater cooperation between the CFIA inspector and the producer's veterinarian of record before notices of violation are issued. We further recommend that the opinion of the private veterinarian be included as a requirement within the regulations under the *Act*, and be incorporated into all CFIA training materials.
- That due diligence be incorporated into an individual producer's/transporter's defense of a violation under the *Act* in order to create more incentive to adopt and document best management practices, and to better promote the goal of improving welfare outcomes for animals in transport. Strict liability offences, which do not permit a due diligence defence to be used, are typically reserved for minor offences such as parking infractions. Given the financial magnitude of penalties that can be issued under the *Act*, we do not believe that the application of strict liability is fair or appropriate.

The following was received from CFIA in response to these recommendations:

"We strive to ensure all inspection-related decisions are made in a manner that is both fair and consistent. While situations may appear similar, each individual case must be assessed on its own merits that could impact the enforcement decision. Before Notices of Violation (NOV) are issued, each file is reviewed by an Inspection Manager, Regional Chief Inspector, and an EIS Investigative Specialist to ensure the file is complete and that the evidence is supportive of an enforcement action. WE believe our decisions are fair, and consistent with the regulations. In addition, if a regulated party feels a NOV is unjustly issued, there is a Review and Tribunal process in place to allow them to contest the decision."

BFO strongly encourages all producers to report cases of inspection inconsistency to BFO so that these concerns can be flagged with CFIA and OMAFRA officials. Producers are also encouraged to consider submitting complaints about a specific inspector directly to the inspector's supervisor or manager. Questions regarding the complaints process, as well as a list of CFIA supervisors and managers has been appended to this document for reference.

With respect to the disclosure of CFIA inspector training, and industry input on that training, the following response was received in 2017 from Kevin Urbanic, Chief Inspector for Ontario:

"I would also like to acknowledge your request that we invite livestock groups, transporters, auctions, feedlots, veterinarian groups, and processors to CFIA Humane Transportation training and to share CFIA inspection training materials to assist with their own training and understanding of compliance decisions. I support the sharing of policies and training materials between CFIA and industry, and feel that joint training initiatives and transparent decision-making benefits everyone. While there is no current process in place to facilitate this, I commit to continuing to work with my colleagues and our Operational Guidance and Expertise Unit to



find a way to allow this to occur. I hope to organize an informal discussion with appropriate provincial associations to identify ways to increase collaboration with respect to the training of industry and CFIA inspection staff. When this happens, I will be sure to send an invitation to your organization.”

To date, no follow-up on this commitment has occurred. BFO will raise this issue at the next Working Group meeting and report back on any response that is received. BFO also intends to raise this concern with the Canadian Cattlemen’s Association.

In closing, BFO will continue to advocate for improved transparency of inspection procedures and requirements at both levels of government.

Thank you for bringing this resolution forward.

Sincerely,



Rob Lipsett
President

Cc: BFO Board of Directors
Calvin Anstett (Mover)
Mike Huettlin (Secunder)
Steve Thede (AC)



CFIA Complaints Process

Question: I don't agree with an inspection or enforcement decision – who do I talk to?

The first point of contact for individual establishments and regulated parties should be the relevant inspection office. Inspection staff may subsequently seek clarification or direct the query as appropriate.

Operations Branch at the CFIA is organized at the regional level along a chain of command as follows:

1. Inspector
2. Supervisor
3. Inspection Manager
4. Regional Chief Inspector
5. Area Chief Inspector

Questions or disagreements about an inspection decision will be dealt with along this chain of command. If your matter cannot be resolved with the local contact, you will be encouraged to engage the supervisor, inspection manager and/or Regional Chief Inspector up to the Area Chief Inspector to reach a resolution.

The Contact Information for the CFIA's Area and Regional Offices can assist you in contacting the relevant inspector, supervisor, inspection manager, Regional Chief Inspector, or Area Chief Inspector.

Question: I want to register a complaint, comment or compliment related to a decision taken by a CFIA employee or regarding the quality of service provided to me by a CFIA employee. Who can I contact?

The process for addressing matters that require resolution is incremental, and begins with communication with the local CFIA/inspection staff contact. If the matter cannot be resolved with the local contact, you are encouraged to engage the supervisor, inspection manager and/or Regional Chief Inspector up to the Area Chief Inspector to reach a resolution. When a resolution cannot be reached, there is a process to file a formal written complaint to the CFIA for review and consideration.

The Office of Complaints and Appeals provides an impartial and transparent review of matters that cannot be resolved through the management chain. The process allows you to register complaints and appeals related to quality of service, administrative errors and regulatory decisions.

The CFIA uses the principles of transparency, accountability and service to govern interactions with industry and other stakeholders. The *Statement of Rights and Service for Producers, Consumers and Other Stakeholders* was developed to formally establish those principles and complements the CFIA's values and ethics.

More information on the [Complaints and Appeals Office](#) is available on the CFIA website.

Contact: Kathy Scott, Director 1-800-442-2342 or CAO_BPA@inspection.gc.ca





20-03
BSE Risk Status

July 7, 2020

Chris Strutt
President
Grey County Beef Farmers Association

Dear Chris,

The following resolution was passed at the Beef Farmers of Ontario (BFO) annual general meeting in February and was recently discussed by the BFO Board of Directors:

WHEREAS, CFIA did not make BSE application for reduced risk status, and
WHEREAS, this issue is important to aid in the beef products trade,
THEREFORE, BE IT RESOLVED THAT BFO and CCA will make a strong effort to have this application completed on time at the next opportunity to make application for a reduction in BSE risk status.

Due to the discovery of Bovine Spongiform Encephalopathy (BSE) in Canada in 2003 and the most recent discovery of BSE in an animal born in March 2009, Canada has been classified as a “controlled risk” country. This has severely limited trade opportunities for Canadian beef, as well as processing options in the U.S. where segregation of cattle is required if the plant is serving a trade market like South Korea. Our BSE risk status is also the rationale for expensive SRM removal requirements in Canada.

The BFO Board of Directors is pleased to say the application process to the World Organization for Animal Health (OIE) for changing our BSE risk status from controlled to negligible has not been delayed during the COVID-19 pandemic this year. The first deadline was met in May 2020, and we have recently heard from Canadian Cattlemen’s Association (CCA) that Canada’s full application to be reclassified as negligible risk is prepared and ready to go and that July 31, 2020, will be Canada’s submission date. As per CCA, the application is comprehensive and well constructed, and the cross-sectional CFIA team, in cooperation with CCA representing industry, was a huge success.

A final decision on Canada’s negligible risk status is expected by spring 2021. The following steps will have to be taken to determine our risk status:

- Canada’s submissions and supporting evidence are reviewed by a team of international subject matter experts.
- Based on their evaluation, a recommendation is made to the Scientific Commission for Animal Diseases.
- The Commission reviews the recommendation.



- If accepted and endorsed, it is proposed that Canada be recognized as negligible risk.
- The proposal is then circulated to the delegates of all OIE member countries.
- Member countries have 60 days to register an objection in writing with supporting scientific or technical evidence.
- Official recognition is achieved through adoption of a resolution by the International Committee during the annual General Session of the OIE.

Canada's controlled BSE risk status has had massive economic costs to the industry and producers through closed markets and SRM removal requirements, and it has also limited processing options south of the border while Eastern Canada has been going through a prolonged processing capacity shortage. Ensuring the application to the OIE is prepared in time for 2020 deadlines has been a top priority for BFO and CCA, especially considering the extreme disappointment of not meeting the 2019 deadlines. We are pleased to have received the most recent update from CCA that Canada's application is ready to submit in July 2020.

Ensuring that Canada's application makes it through the final steps to the OIE for their review will continue to be one of BFO's top priorities, and we will keep producers updated throughout the application review and decision-making process over the next year. We will also be working with CCA on pushing CFIA to revise Canada's SRM removal requirements as quickly as possible once our BSE risk status is changed.

Thank you for bringing this resolution forward.

Sincerely,



Rob Lipsett
President

CC: BFO Board of Directors
Darrell Saunders (Advisory Councillor)
Don Hargrave (Mover)
Diane Booker (Seconder)
Murray Brodhagen (Perth)
Mert Schneider (Perth)
John Lunn (Peterborough)
Chris MacFarlane (Peterborough)





February 18, 2021

Darrell Russett
President
Beef Farmers of Hastings County

20-04
Investors for
Federal Processing
Plant

Dear Darrell,

The following resolution from Beef Farmers of Hastings County was passed at the Beef Farmers of Ontario (BFO) annual general meeting in February of last year:

WHEREAS, we have a shortage of federal killing capacity, and
WHEREAS, the combined domestic and foreign demand for Ontario beef has increased due, in part, to the marketing efforts of BFO and Ontario Cattle Feeders Association,
THEREFORE, BE IT RESOLVED THAT BFO spearhead a plan to attract potential investors in a federally registered beef slaughter facility.

The BFO Board of Directors would like to thank Beef Farmers of Hastings County for bringing this resolution forward.

The need for increased processing capacity, both provincially and federally, has been a key government relations priority for BFO for close to two years. We have urged governments to invest in infrastructure assistance programs and incentives, access to labour, both foreign and domestic, and the development of recruitment, training and education programs for meat cutters, butchers, and other meat processing workers. We had the opportunity to present our recommendations in these areas during appearances before federal and provincial House of Commons (HOC) standing committees this year, including the HOC Industry, Science and Technology Committee, the HOC Agriculture and Agri-Food Committee, on two occasions, and the provincial Finance and Economic Affairs Committee. Our requests were also included in numerous BFO written submissions provincially and federally, and during our conversations with MPs, MPPs and political staff. I also took part in Minister Hardeman's dedicated processor capacity working group, which met regularly throughout 2020.

BFO was encouraged by the \$11.5 million funding announcement at the end of November 2020 by the federal and provincial governments for meat processors and farmers. Specifically, for meat processors, the province and federal government established the *Meat Processors Improvement Initiative*, which allocated \$4 million for increasing provincial abattoir processing capacity. The initiative provided up to \$150,000 per project to assist with expansion and plant modernization. Though the funding pool was small, we viewed this investment as a critical step in the right direction. The provincial and federal governments acknowledged in their announcement that this is an immediate response to support

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Ontario's meat processors and, although intake for that funding program closed at the end of December, is part of a longer commitment. BFO was informed that the funding for the Meat Processors Improvement Initiative was fully subscribed, further highlighting to the government how needed the funding is and how eager provincial processors are to increase their capacity. Other programs were also offered in this area this year thanks to lobby efforts by groups like CCA, CMC, BFO, NCFA, CPC, and others, including the *Emergency Processing Fund* and the *Agri-Food Workplace Protection Program*, which invested tens of millions of dollars into federal and provincial meat processing plants across Canada in 2020.

Another major issue contributing to processing capacity challenges stems from an ongoing trade issue with South Korea that is having a negative impact on American packer interest in Canadian cattle. South Korea requires shipments of beef from Canada be halted if another case of BSE is found in Canada. Because the U.S. does not have this requirement, processors in the United States that would otherwise compete for Canadian cattle are hesitant to do so as they must segregate Canadian animals and process them during dedicated shifts. This is a cost most U.S. plants are not willing to incur.

BFO, and groups like CCA, CMC and the NCFA have pushed Canadian lawmakers to find a resolution with South Korea to have this requirement removed. While our preference is to have Canadian cattle processed domestically, the issue with South Korea has reduced the availability of processing space and competition for our cattle.

We have also spent a considerable amount of time lobbying for revisions to Canada's specified risk material removal requirements (known as SRM), another relic from the BSE days. Canada's requirements have created a significant unlevel playing field between Canadian and American cattle producers and processors that is no longer supported by science. The current cost discrepancy between the two countries is significant. On average, Canadian processors remove 58 kilos of SRM on animals over 30-months of age, whereas the US removes approximately 900 grams. The Canadian Meat Council estimates that this costs our sector 31 million dollars in lost value per year. There are also costs associated with SRM removal on other classes of animals that only impact Canadian producers and processors.

Meat that is lost in the removal of the spinal column in over 30-month animals in Canada can be harvested in the United States and sold to consumers in Canada, which further adds to the disparity and lack of fairness between the two systems.

While we are pleased that discussions with CFIA to address this disparity have finally begun, the goal should be to fully align our SRM rules with the United States as soon as possible. This will have immediate benefits to the Canadian sector. BFO was extremely pleased to be offered a seat on the industry-government working group looking at this issue. Ron Stevenson, BFO Director (Southern) was appointed by the Board to represent Ontario cattle producer interests on this working group.

Lastly, we are extremely pleased by the recent news that TruHarvest Meats, a Canadian-owned and operated beef and veal harvesting facility in Toronto will begin operations at the former Ryding-Regency facility this spring. The operation is a federally inspected CFIA-approved facility operating with an approved HACCP program. The plant will work towards a capacity of 1,600 head per week making it one of the larger facilities in Ontario.



BFO has already been in talks with TruHarvest to discuss ways that our Ontario Beef Market Development program may be able to assist their facility in accessing and developing markets for Ontario beef products.

BFO will continue to advocate for policy solutions and investment in the beef processing sector to ensure a more competitive and sustainable marketplace for beef producers in Ontario, in partnership with groups like the Canadian Cattlemen's Association, the Canadian Meat Council, and Meat and Poultry Ontario.

Thank you again for taking the time to submit a resolution on this important issue.

Sincerely,

A handwritten signature in black ink that reads "Rob Lipsett". The signature is written in a cursive, flowing style.

Rob Lipsett
President

CC: BFO Board of Directors
Paul Kinlin (Advisory Councillor & Seconder)





September 22, 2020

Dale Mountjoy
President
Beef Farmers of Durham Region

20-05
SRM Removal
Requirements

Dear Dale,

The following resolution was passed at the Beef Farmers of Ontario (BFO) annual general meeting this past February in Toronto:

WHEREAS, current regulations around SRM requirements cost Ontario beef producers thousands of dollars, and

WHEREAS, Ontario cattle can move south of the border and be slaughtered, then have the meat shipped back to Ontario without this issue or cost,

THEREFORE, BE IT RESOLVED THAT BFO, in conjunction with CCA, work with local politicians to lobby Agriculture Canada to work with CFIA on the issue of SRM removal.

The BFO Board of Directors shares your concerns regarding the competitive disadvantage Canadian beef producers and processors face as a result of our current Specified Risk Material (SRM) removal regulations.

On average, Canadian processors remove 58 kilograms of SRM on OTM animals, whereas the United States removes approximately 900 grams. Based on 2008 estimates that were done by the Canadian Meat Council (CMC), this costs the Canadian industry in excess of 35 million dollars per year. Meat that would be deemed SRM in Canada can be harvested in the United States and sold to consumers in Canada, which further adds to the disparity and lack of fairness between the two systems. Earlier this year, BFO requested that the Canadian Cattlemen's Association (CCA) work with CMC to update the estimates on the cost SRM regulations have on the Canadian beef industry annually. I am pleased to report that CMC has agreed to update these estimates, which will greatly assist the industry with advocacy efforts in seeking to have the current regulations changed.

BFO, the CCA, the CMC, and others have long advocated and lobbied for SRM harmonization with the United States. Indications from CFIA have always been that until Canada's BSE risk status is downgraded from "controlled risk" to "negligible risk," there would be no appetite on the part of the government to review Canada's current SRM regulations. Previous comments by CFIA officials have even gone so far as to say that Canada may never soften its SRM regulations, even once negligible risk is obtained.



In response to this resolution, and our long-standing concerns over Canada's SRM regulations, Ontario Directors to the CCA presented the following motion, which was carried at the August CCA Semi-Annual meeting:

Whereas CCA supports the harmonization or enhanced alignment of Canada's SRM removal requirements with that of the U.S., and

Whereas CCA has included this as a priority in the 2021 CCA federal budget submission document,

Therefore, be it resolved that CCA increase the priority and attention on this issue and aggressively lobby for SRM harmonization with the U.S.

I am pleased to report that the new CFIA President, Dr. Siddika Mithani, has been much more receptive and open to reviewing Canada's SRM regulations, and has committed to CCA to begin a review of current requirements this fall. This move is an extremely positive development that we hope will eventually result in meaningful changes that reduce or hopefully eliminate the competitive advantage that the United States has over Canada in this area.

I appreciate and thank the Beef Farmers of Durham Region for bringing this resolution forward. I trust some of the positive updates contained in this letter will be welcomed news. BFO will continue working diligently on this critical issue with CCA, CMC, and others, and will continue to update producers if and when any significant developments occur.

Sincerely,



Rob Lipsett

CC:
Board of Directors
Stan Found (Advisory Councilor)
Tim Davidson (Seconder)





20-06
Risk Management Program
Funding

July 7, 2020

Mert Schneider
President
Perth County Beef Farmers' Association

Dear Mert,

The following resolution was passed at the Beef Farmers of Ontario (BFO) annual general meeting in February and was recently discussed by the BFO Board of Directors:

WHEREAS, was a financially terrible year for Ontario Beef producers, and
WHEREAS, beef producers will apply for financial assistance from RMP, and
WHEREAS, the RMP program will need more funding,
THEREFORE, BE IT RESOLVED THAT BFO lobby for more money for the Risk Management Program.

Increased funding for the Ontario Risk Management Program (RMP) has been a top BFO lobby priority for a number of years, but the economic losses of the past couple of years and the unprecedented market uncertainty experienced during the COVID-19 pandemic in 2020 have further amplified the critical need for more funding in the RMP.

Ontario's beef producers have been facing risks beyond their control due to increased costs of production, trade uncertainty, and a level of sustained market volatility we have never before experienced. It has been BFO's longstanding position that the best remedy for these risks is to increase Ontario's investment in the RMP because it fills a critical gap for livestock commodities that are not protected by the supply management system and don't have access to other effective farm support programs like crop insurance. RMP is the most responsive and targeted program available, but it has been chronically underfunded and is not able to consistently cover financial losses experienced in the beef sector.

During the last provincial election, the Ontario Conservative Party committed to increasing funding to the RMP by \$50 million. Minister Hardeman and other members of the Ontario Cabinet have repeatedly stood behind this commitment, though the increased funding has not been delivered and we have been told that it is scheduled for Ontario's 2021 budget.

BFO has coordinated lobby efforts on raising the cap on the RMP with other agricultural groups for a number of years through the Ontario Agricultural Sustainability Coalition (OASC). More recently, BFO



has requested a lifting of the RMP funding cap through written correspondence and meetings with government representatives during COVID-19 in collaboration with Grain Farmers of Ontario, Ontario Pork, Ontario Sheep Farmers and Veal Farmers of Ontario. As part of our RMP-related lobby efforts in 2020 alone, BFO has taken the following actions:

- Numerous meetings with Minister Hardeman and other members of the Ontario Cabinet, as well as the Premier's office, representing BFO solely and also as part of OASC
- A presentation and written submission to the Standing Committee on Finance and Economic Affairs as part of their 2020 budget consultations
- Coordinating grassroots lobby efforts that included supplying members with email and phone scripts, contact information, speaking notes and leave-behinds so they could lobby their MPPs for increased funding to the RMP
- Letters sent to every Conservative MPP and all provincial party leaders asking for increased funding to the RMP during the early days of COVID
- Letters to Minister Hardeman and Premier Ford requesting a lifting of the RMP cap to help ensure Ontario farms survive the economic turmoil of COVID (two most recent letters enclosed)

While we understand COVID has stretched government resources, we believe our government needs to prioritize support for our food system through immediate investment in the RMP. We've also asked the federal government to do the same, and we have implored Minister Hardeman and our other provincial leaders to support our calls for assistance. However, with or without funding from the federal government, we believe the province must take leadership on this issue.

Increased funding to the RMP is BFO's top lobby priority, and we continue to evolve our lobby strategy and work with our OASC counterparts whenever possible to ensure we are reaching the holders of Ontario's purse strings and convincing them of the importance of the RMP, as well as Ontario's agricultural sector overall.

Thank you for bringing this resolution forward on such an important issue for our industry. We will strive to keep our members updated as we continue our lobby efforts and ask for grassroots support in getting our message heard by the provincial government.

Sincerely,



Rob Lipsett
President

CC: BFO Board of Directors
Murray Brodhagen (Advisory Councillor & mover)
Jost Van der Heiden (Seconder)

Encl.





February 18, 2021

Scott MacDonald
President
Bruce County Beef Farmers

20-07
**Beef Co-op/
Apprenticeship
Program**

Dear Scott,

The following resolution was passed at the Beef Farmers of Ontario (BFO) annual general meeting in February 2020 and was recently discussed by the BFO Board of Directors:

WHEREAS, there is a high number of feedlots in Ontario searching for employees to help out with cattle, and

WHEREAS, there are fewer farms in Ontario, which results in fewer people naturally familiar with working on a cattle operation,

THEREFORE, BE IT RESOLVED THAT BFO work with the University of Guelph to see about creating an apprenticeship program in Ridgetown, similar to the Dairy Herdsman apprenticeship, where students spend 10-20% of time in class and 80-90% on-farm.

BFO is strongly supportive of agriculture education initiatives and the promotion of agricultural knowledge for students, and we agree that it is important to have more educational opportunities for beef production in Ontario.

At the high school level, there are many school boards in Ontario that provide “Specialist High Skills Major” (SHSM) programs in agriculture for high school students in grades 11 and 12. Students enrolled in this SHSM agriculture program are required to obtain workplace experience through cooperative education placements, take three elective courses (which might include courses in livestock production, large animal handling, livestock medicine, etc.), and participate in other experiential learning opportunities.

The creation of new apprenticeship programs is the responsibility of the Ministry of Training, Colleges and Universities and the Ontario College of Trades. The *Ontario College of Trades and Apprenticeship Act* states that the Minister of Training, Colleges and Universities can prescribe a new trade, and the Ontario College of Trade’s Board of Governors is responsible for defining the scope of the new trade. Despite this provision, no new trades have been created since November 2018, as the Ontario government has been working to modernize the apprenticeship system and, in doing so, has placed a moratorium on the classification of new trades.



BFO has been in touch with the Ridgetown Campus Business Development Centre about the Dairy Herdsperson apprenticeship program. Ridgetown Campus took on the in-class learning component of the apprenticeship program when the University of Guelph Kemptville Campus closed, and Ridgetown Campus and OMAFRA worked together to develop an updated curriculum for the program. With the moratorium on the classification of new trades, developing a similar apprenticeship program is not doable at this time.

There are other avenues available through which new beef production programs or courses could potentially be developed. Ridgetown's Continuing Education Training provides online courses in livestock medicine, sheep nutrition management and poultry production. As another example, Ontario Sheep Farmers, in partnership with OMAFRA, developed online professional development courses to facilitate education and knowledge for those interested in the sector, which includes courses in small ruminant production, a master shepherd's course, and other topics.

BFO organized the Cow-Calf Management School in 2019, a two-day event that had farm tours, expert speakers on farm management, and cow-calf producers who spoke about their farms and business practices. BFO intended to have a Feedlot Management School in the summer of 2020, but that was unfortunately postponed due to the current pandemic. The Feedlot Management School, when held, will include speakers on feedlot management and production, beef research, and processing.

The BFO Board of Directors would like to thank Bruce County Beef Farmers for bringing this resolution forward. BFO will continue to examine opportunities to expand beef production education in Ontario and will stay in touch regarding our efforts.

Sincerely,



Rob Lipsett
President

cc: BFO Board of Directors
Steve Eby (Mover)
Scot Legge (Seconder)
Jordan Burns (Wellington)
Jason Hurst (Wellington)





**20-08
Premise Identification
Number**

May 25, 2020

Kevin McArter
President
Huron County Beef Producers

Dear Kevin,

The following resolution was passed at the Beef Farmers of Ontario (BFO) annual general meeting in February:

WHEREAS, the Federal Government is committed to introducing mandatory livestock movement reporting in Canada and industry's preferred method of reporting is "Group Movement" with the use of movement documents rather than individual scanning of the individual animals, and
WHEREAS, Premises Identification Number (PID) is a critical piece of the required regulated information in the group movement proposal, and
WHEREAS, government programs in the future (example CAP etc.) will need a Premise ID number to qualify for programs,
THEREFORE, BE IT RESOLVED THAT BFO encourage and support all beef producing operations to obtain a Premises Identification Number for their production locations.

I would like to thank Huron County Beef Producers for bringing this resolution forward. Although not currently mandatory in Ontario, BFO highly encourages its members to obtain a Premises Identification Number (PID). There are a variety of changes that have occurred recently in the industry or are on the horizon (such as traceability regulations), which further illustrate the increased need for producers to obtain a PID for their operations now more than ever.

To this end, BFO sent a memo to its producers on May 22, 2020, with information on the process to acquire a PID. Contact information, location, type of agricultural and agri-food operation on the site, and animal species are required information for acquiring a PID. It is worth noting that there is no cost to producers to acquire a PID and there are benefits to obtaining a PID. For instance, a producer must have a PID to be eligible for funding through the Canadian Agricultural Partnership or the Risk Management Program, as well as for reimbursement under the Ontario Wildlife Damage Compensation Program. Additionally, many producers opt to enroll in quality assurance programs, such as VBP+ and Ontario Corn Fed Beef. Some of these programs require a PID at present, and others are likely to require a PID in the future.



Additionally, premises identification is a way of linking livestock and poultry to land locations and is critical to support disease control activities and for managing animal health emergencies. Having a PID for an operation allows for traceability information to be accessed quickly to aid in protection of animal health, public health and market access for the industry.

Although a PID is not currently required under the amended *Health of Animals Regulations*, Part XII Humane Transportation, a producer or transporter does need to record all animal movement. This can be done through the use of addresses, but could be simplified by using the PID associated with each location. It is possible, and perhaps likely, that a PID will be required by the Canadian Food Inspection Agency in the future as part of the impending traceability regulations, which are set to be released in Canada Gazette I in the fall of 2020.

In addition to the aforementioned memo, and in light of recent and impending changes to policies and legislation, the BFO Board of Directors has taken the position that PIDs should be mandatory for all producers in Ontario, as is the case in many other provinces. This position will be communicated to OMAFRA going forward.

Thank you for bringing this resolution forward.

Sincerely,



Rob Lipsett
President

Cc: BFO Board of Directors
Ron Stevenson (Mover)
Tim Prior (Secorder)





October 26, 2020

Kent Schmidt
President
Lanark County Cattlemen's Association

**20-09
Meat Cutting
Education
Programs**

Dear Kent,

The following resolution was passed at the Beef Farmers of Ontario (BFO) annual general meeting in February and was recently discussed by the BFO Board of Directors:

WHEREAS, in light of the large deficit of qualified meat cutters in the Ontario Industry, and the declining number of Provincial abattoirs in which to learn the trade, with one of the few Schools offering a diploma in this skill at OLDS College in Alberta,

THEREFORE, BE IT RESOLVED THAT BFO in conjunction with the Canadian Professional Meat Cutters, pursue with University of Guelph and other Ontario colleges the possibility of creating more meat cutting programs in Ontario to service the growing need with the Promotion of "Ontario Beef" and report back to this meeting in 2021 on progress with the education of meat cutters and livestock inspectors for the Ontario and Canadian beef industries.

The BFO Board of Directors shares your concerns around the lack of qualified and skilled meat cutters available to work in Ontario processing plants. According to Meat and Poultry Ontario (MPO), there is an estimated shortage of 2,400 meat cutters in Ontario. Education programs are one part of the solution required to address the shortage of meat cutters. The lack of educational opportunities can make it difficult to attract students and workers to the meat cutting profession and develop a talent pool of qualified meat cutters, which contributes to the labour shortage affecting meat processing facilities.

BFO has reached out to academic institutions and other industry organizations to gain a better understanding of the current meat cutting education programs in Ontario. In doing so, BFO discovered new and upcoming meat cutting education programs that are expected to begin later this year or at some point in 2021.

Currently there are two institutions offering meat cutting/butchery programs in Ontario. The first is the Seaway Valley Meat Cutting Institute in Cornwall, which offers a pre-apprenticeship program for students or employees looking to gain "Retail Meat Cutter" apprenticeship hours. The second is at Fanshawe College in London, which from 2017-2019 delivered the Retail Meat Cutter pre-apprentice program. Due to the high interest in the program, Fanshawe College has transitioned to the "Professional Butchery Techniques" program, which is a 30-week Ontario College Certificate program

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that will be delivered over two semesters and will enroll 20 students. The program start date was initially planned for September 2020, but due to the COVID-19 pandemic it has been postponed until 2021.

Canadore College in North Bay has also been working closely with abattoirs and a new meat processing facility in the area to address labour concerns. Canadore College intends to provide the “246T Process Operator – Food Manufacturing” apprenticeship training and has applied to be a Training Delivery Agent for the Ontario College of Trades. The program will include both an online learning component and an in-person meat cutting component for practical training. The tentative start date of this apprenticeship program is fall 2021.

MPO is also very engaged in addressing labour shortage issues and has been developing a meat cutting training initiative in Ontario. As part of their “Growth Strategy”, MPO’s strategic plan for the coming years, they are developing training and innovation initiatives to build a skilled meat processing workforce in Ontario. A key aspect of MPO’s strategy is the creation of the “Meat-Tech Centre of Excellence”, which will act as a learning and skills development hub for meat cutting. The Meat-Tech Centre of Excellence will include a meat cutter/butchery certificate program for those beginning in the meat cutting profession, as well as for those already in the field and seeking to advance their skills. MPO intends to conduct a pilot project for its meat cutting program in the coming months.

BFO also reached out to Food Processing Skills Canada to gain a better understanding of the “Canadian Certified Industrial Meat Cutter” certification process. Food Processing Skills Canada continues to work closely with organizations that have developed or are working on developing meat cutting education programs. Most recently, Food Processing Skills Canada partnered with Mohawk College in Hamilton to develop a meat cutting program targeted at increasing the number of women in the field.

The BFO Board of Directors would like to thank Lanark County Cattlemen’s Association for bringing this resolution forward. BFO is pleased to see that current meat cutting education programs have seen some success in getting students excited about a career in meat cutting, and we are also encouraged to see there are new programs and training initiatives being established to attract students to the profession and support employers by developing skilled labour. BFO will stay in touch with the various institutions and organizations noted above on their plans and progress and keep the county/district associations updated.

Sincerely,



Rob Lipsett
President

cc: Ivor Thurston (mover)
Dave Campbell (Advisory Councillor)





20-10
Beef and Environment
Classroom Programs

July 7, 2020

Scott MacDonald
President
Bruce County Beef Farmers

Dear Scott,

The following resolution was passed at the Beef Farmers of Ontario (BFO) annual general meeting in February and was recently discussed by the BFO Board of Directors:

WHEREAS, consumers are influenced at a young age of what they will eat, and parents and teachers have a strong influence on students' food choices notwithstanding the school curriculum, and
WHEREAS, many counties have found success in education programs outside the classroom such as Roots of Bruce or Grown in Grey, and
WHEREAS, other food groups such as DFO hire experienced educators to work in school to demonstrate the benefits of their product, tell their story and answer questions,
THEREFORE, BE IT RESOLVED THAT BFO employ a professional to educate teachers and deliver classroom presentations on the environmental benefits of pasture and hay crops, and the environmentally sustainable practices currently being used by Ontario beef farmers.

The BFO Board of Directors wholeheartedly supports the inclusion of science-based and factual education in the classroom, and appreciates the hard work and dedication many county/district associations have put towards educating students about beef production and the relationship beef has with the environment.

Consumer engagement and education remain high priorities for BFO, especially regarding the environmental impact of beef and promoting Ontario beef. We launched our new consumer-facing website this past winter, which showcases important information about the environment, animal care, antibiotic and hormone use, nutrition, and where to purchase Ontario beef, amongst other things. This new consumer website is www.ontbeef.ca. Information on the environmental value of beef and grasslands, i.e. forage and pasture land, is being shared by BFO through videos, articles and factsheets, and we have also been using various social media platforms including Instagram, Twitter, Facebook and Pinterest.

As part of BFO's consumer engagement and education initiatives, BFO has a \$500 annual membership to AgScape (previously known as Ontario Agri-Food Education). AgScape is an Ontario organization with a mandate to provide factual, balanced, career-driven and curriculum-linked resources and educational



programs about agriculture and food production to elementary and high school classrooms. In addition, BFO provides support of \$5,000 annually to AgScape's Teacher Ambassador Program. This program allows Ontario certified teachers who are knowledgeable about agriculture to visit grades 7 to 12 classrooms and deliver lessons pertaining to the environment, animal care and food safety, amongst other topics, at no cost to schools. AgScape works with various agriculture industry partners, such as OMAFRA and BFO, during the development and review of lesson plans. Additionally, AgScape maintains a working relationship with the Ontario Ministry of Education.

Earlier this year, a team of BFO staff and directors undertook a review of all AgScape lesson plans and resources that include content related to beef production, the environment, food safety and animal care. With the guidance provided by this team, we are sure that the information AgScape is using in classrooms is unbiased and factual, and that it adequately reflects beef production in Ontario. We also believe the lesson plans are interactive and engaging, align with the Ontario curriculum, and encourage critical thinking.

To inquire about a lesson, teachers are required to complete the request form found on the AgScape website, www.agscape.ca. AgScape will follow up with any request to confirm the booking and to discuss the lesson options that would be best suited for that classroom. We are hopeful that elementary and high school teachers will take advantage of the free AgScape lessons through the Teacher Ambassador Program, and we welcome and encourage any additional promotion of the Teacher Ambassador Program within the county/districts.

We want to reach as many students as possible about the sustainable practices used on beef farms and the environmental benefits of beef production, so we have investigated the feasibility of an educator program similar to that of Dairy Farmers of Ontario (DFO). BFO staff met with DFO representatives to discuss the resources required to operate their program, the program's evaluation methods, and the expected yearly outcomes. To ensure we are reaching every county/district that may be interested, using science-based resources, and delivering age-appropriate lesson plans, the program would cost approximately \$700,000 annually. In addition, an educator program would take several years to develop before it could be introduced to classrooms and a comprehensive evaluation would need to be included to ensure the program is effectively educating Ontario's students and efficiently using BFO resources. Now with a better understanding of the resources that would be required to run a program similar to DFO's, we do not believe a province-wide educator program is feasible for BFO.

BFO's consumer engagement and producer relations teams, however, remain highly interested in providing beef education in classroom environments. In the past, BFO staff have provided presentations, as requested, at various elementary and high schools, as well as colleges and universities. These have included the University of Guelph Ridgetown Campus, Algonquin College and Brescia University College. If there is interest in having BFO staff provide a classroom presentation about beef production, the environment, animal care, or any other topic of interest, please contact the BFO office at 519-824-0334. We would be happy to set up a date and time to visit the classroom. This opportunity will be communicated to all county/district associations. With broader adoption of video conferencing, there is an opportunity for BFO staff to also present to classrooms virtually, if not in person.

To supplement any classroom presentations and learning, BFO offers a variety of printed and virtual resources free of charge. Resource topics include, but are not limited to, the environment, animal care, antibiotic and hormone use, and nutrition. To inquire about resources, please contact Bethany Storey, Communications Coordinator, at bethany@ontariobeef.com or 519-824-0334 extension 224.



We will continue to promote the use of science-based and factual information about beef production in classroom settings, and we welcome all opportunities in which we can engage with students about the environmentally sustainable practices on beef operations. Thank you for bringing this resolution forward.

Sincerely,

A handwritten signature in black ink that reads "Rob Lipsett". The signature is written in a cursive, slightly slanted style.

Rob Lipsett
President

CC: BFO Board of Directors
Mike Jeffray (Mover)
Lynn Thede (Secunder)
Steve Thede (Advisory Councillor)





September 22, 2020

Chris Strutt
President
Grey County Beef Farmers Association

**20-11
Meat
Terminology**

Dear Chris,

The following resolution was passed at the Beef Farmers of Ontario (BFO) annual general meeting in February:

WHEREAS, plant-based proteins are making extreme efforts to displace the market share of beef, and **WHEREAS**, plant-based proteins are using meat and beef terms in their language for names and labeling, **THEREFORE, BE IT RESOLVED THAT BFO** and CCA work with other meat commodity organizations in lobbying all levels of government to legislate the removal of meat-based language and terms from plant-based protein products.

BFO agrees that the use of traditional meat terms by plant-based protein products, such as “burger” and “patty,” is of serious concern to our sector. The use of these terms on alternative protein products run the risk of misleading consumers at the retail level. There have been multiple bills and laws proposed in the United States seeking to restrict the use of meat terminologies by alternative protein products on packaging and labels. The entire livestock and meat protein industry in Canada is closely monitoring the development of this type of legislation south of the border to see how implementation and enforcement will be handled given the number of legal challenges that have already been filed against bills of this nature, for various reasons.

Responsibility for this issue rests with the Canadian Food Inspection Agency (CFIA) in Canada, as they regulate and enforce product claims, which include expressions, words, figures, depiction, or symbols. In discussions that beef sector representatives have had with CFIA on this issue, we are not convinced that the Agency believes that shared terminology used on product labels between real meat, plant-based protein, or simulated meat, will mislead consumers. Traditional product descriptors such as nuggets, fingers, or burgers as of right now require the actual type of product in-front of them, such as beef or chicken. Currently, the term “meat” under CFIA regulations is defined as the “edible part of a carcass that is muscle associated with the skeleton, tongue, diaphragm, heart, gizzard, or mammalian esophagus” and definitions such as burger only refer to a flat serving of food a bun with limited regulation on what are ingredients of the burger.

An integrated and collaborative approach to this issue is important, given its national scope. As a result, BFO is collaborating with CCA to ensure that we have a strong, consistent voice when talking to

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government officials. CCA continues to monitor the labeling database to identify any product that has terms that may mislead the consumer into thinking the product is beef. The CCA Food Policy Committee oversees this initiative and has been actively reporting any products that infringe on beef terminology directly to CFIA.

Unfortunately, our current system in Canada is complaint-based, meaning that active monitoring and reporting is the only current viable approach to combat this issue in the absence of regulatory guidance. With that said, BFO strongly believes that there needs to be specific regulations that require clear differentiation between meat from non-meat or imitation products. We continue to support CCA's effort in lobbying for those changes.

On this front, I would draw your attention to the appended letter that CCA sent to CFIA in July, alongside the Canadian Pork and Canadian Meat Councils outlining the approach the Canadian livestock and meat sectors would like to see in response to this issue. A meeting with the CFIA President also took place in support of the direction and changes outlined in the letter. A guidance document from CFIA to the alternative protein industry on how they will be able to label their products is planned to be released this fall for public consultation. CCA, BFO, and other meat protein groups are committed to working together in a unified manner in response to this consultation. The main focus will be to ensure that the language contained within the guidance document prevents consumer confusion at the retail level.

We thank you for bringing forward your resolution on this crucial issue. BFO will continue to work hard to address our collective concerns and will update the membership on any major developments regarding the use of meat terminology by plant-based, alternative, or imitation proteins as they become available, including the finalization of label guidance currently in-development for the alternative protein sector.

Sincerely,



Rob Lipsett
President

cc: BFO Board of Directors
Darrell Saunders (Advisory Councillor)
Diane Booker (Seconder)
Mike Buis (Advisory Councillor)
John Buis (President, Kent County Cattlemen's Association)





Briefing Note: Simulated Meat Products

July 29, 2020

In response to the January 21st, 2020 Top-to-Top Meeting with the Canadian Cattlemen's Association, Canadian Meat Council and Canadian Pork Council, the meat industry prepared this briefing note on regulatory and marketing concerns in regard to simulated meat products as requested by Dr. Siddika Mithani, President of the Canadian Food Inspection Agency (CFIA).

Marketing

Issue:

Both the *Food and Drug Act* (FDA) and *Safe Foods for Canadian Act* (SFCA) and regulations are clear that product labelling cannot mislead consumers, particularly through s. 5.1 of FDA and s. 6.1 of SFCA. While it is clear that **not** misleading consumers is the intent, industry has seen a lack of enforcement. The bending of clear definitions and/or disregard of the guidance given by the acts will continue unless a very clear and forward response from regulators is seen.

Ask:

- We encourage CFIA to utilize a dual system of monitoring and complaints during the formative years of simulated meat products to ensure a misleading precedent is not set in the marketplace.
- We encourage CFIA to create a very clear guidance document specifically for the labelling and marketing of simulated meat products and lab-grown protein products to avoid confusion with and defamation of meat as it is defined by Canadian legislation.

Regulatory

Issue:

An area of increasing concern to the Canadian beef and pork sectors is the emergence of simulated meat and lab-grown protein products. Simulated meat products include products that imitate meat but are derived from plants, such as the Beyond Burger. Lab-grown meats, also referred to as 'fake meat', 'meatless meat', 'cultured meat' or occasionally 'clean meat' (which in itself, is a very misleading term), are created by growing animal cells in a lab.

A key concern of Canadian beef and pork producers is the defamatory nature of simulated meat and lab-grown protein products labelling and marketing towards beef and pork. The labelling and marketing of these products often attempts to position meat under an unfavourable light in the areas of animal care and environmental impact. Another equally important concern is the consumer confusion due to misleading labelling of simulated meat and lab-grown protein products. These labels make it easy for consumers to confuse how their food product was produced.

Ask:

- We support the Government of Canada’s legal definition of meat. Simulated meat and lab-grown protein products do not fall under legal definition of “meat” as defined by the Food and Drug Regulation. Thus, they cannot be labelled and marketed as meat. Since these products do not meet the legal definition, we ask that these products be monitored by regulators prior to being put on the market. The government’s current complaint-based system is reactive, and the damage is already in the market before any action is taken.
- We ask that the Government of Canada ensure that the same world-class food safety standards and approvals are implemented for all food products to ensure safe food for Canadians and regulatory fairness for all market competitors.
- We ask that CFIA work with the United States government on regulatory harmonization in this space given the integration and level of trade between the two markets.

Applicable Acts / Responsible Departments

Health Canada is responsible for establishing standards for the safety and nutritional quality of all foods sold in Canada. The applicable Acts covering the issue of concern include the [Food and Drugs Act](#) (FDA), the [Food and Drug Regulations](#) (FDR), the [Safe Food for Canadians Act](#) (SFCA) and the [Safe Food for Canadians Regulations](#) (SFCR). All health and safety standards, including the labelling of food products, under the FDR and the SFCR are enforced by the [Canadian Food Inspection Agency](#).

Note:

Historically, CFIA has asked some processors of simulated food products, including both meats and cheese, to remove misleading terms (meat, cheese, milk, etc.) from their labels. In each of these scenarios, a third-party complaint was required to trigger enforcement by the Agency. However, by then, the product had reached consumers, and in some cases, the damage was already done. In several instances, the companies refused to cooperate with CFIA, and the misleading labelling and marketing continued.

Background: Other Jurisdictions

UNITED STATES

There is a definition of meat as regulated by USDA: In the Code of Federal Regulations, Chapter 9, Section 301.2 (9 CFR § 301.2), “meat” is initially defined as “The part of the muscle of any cattle, sheep, swine, or goats which is skeletal,” with some additional cut-specific definitions. “Meat food product” is later described as food made in whole or in part from meat. Elsewhere in the CFR (9 CFR § 319), terms such as “hamburger,” “sausage,” and “bacon” are defined.

This law pre-empts state law. USDA regulates meat products and FDA regulates plant-based products. Meat products’ labels must be submitted to USDA for approval prior to coming to the marketplace. FDA regulations on labelling are not pre-emptive and they do not require pre-approval of labels. This is a disadvantage to meat products. There must be a level playing field for agricultural products.

North American Meat Institute:

- Position: “It is critical that food labelling is not deceptive or misleading to enable consumers to make informed choices about the products they purchase. As an industry, we support a fair and competitive marketplace that lets consumers decide what food products make sense for them.”

National Cattlemen’s Beef Association (NCBA):

- NCBA wants the Food and Drug Administration to act without delay on “improperly labelled imitation products,” noting a difference in approach from the U.S. Cattlemen’s Association’s desire to have the Department of Agriculture address the issue, in part, through enhanced labelling requirements.
- NCBA sent a [letter](#) to leadership at USDA’s Food Safety and Inspection Service (FSIS), asking the agency to push for FDA action on imitation products being referred to as beef or meat. The letter also requests USDA leadership in oversight of lab-grown and cell-cultured products.
- United States Cattlemen’s Association’s petition requested FSIS “limit the definition of beef to product from cattle born, raised, and harvested in the traditional manner” rather than “coming from alternative sources such as a synthetic product from plant, insects, or other non-animal components and any product grown in labs from animal cells.”
- NCBA doesn’t see the benefit of an enhanced definition. “Rather than expending time and resources to develop a standard of identity which we know FDA will blatantly ignore,” Kester said, “NCBA believes it would be a more prudent use of time and resources for USDA to engage with FDA to facilitate immediate, appropriate enforcement actions against imitation meat product labels in clear violation of the law.”
- NCBA is also calling on FSIS to “assert jurisdiction over lab-grown meat products.” Kester’s letter notes concern that the policy USCA proposes, “could result in meat food product entering interstate commerce without the benefit of FSIS oversight.” Abiding by USCA’s suggested interpretation of meat as “limited to the tissue or flesh of animals” harvested traditionally could

lead to lab-grown or cell-cultured meat products being exempted from FSIS oversight, NCBA contends.

- Products should be labelled “in a way that is legally and scientifically defensible” and does not disparage traditional beef.

FRANCE

- In April 2018, France passed an amendment to its Agriculture Bill. It prohibits any product that is largely based on non-animal ingredients from being labelled like a traditional animal product. This essentially bans the use of meat-like terms on vegetarian products such as “vegetable steak”, “soy sausage”, or “bacon-flavoured strips.”
- The move means food producers and retailers will face a €300,000 fine for attempting to market the likes of vegetarian sausage or vegan burgers. Instead, they will have to be christened with a name that does not suggest they have any relation to meat products.
- It was spearheaded by a farmer Member of Parliament saying, “It is important to fight against false claims: our products must be designated correctly. Terms like cheese or steak will be reserved for products of animal origin.”
- It follows a judgment from the European Court of Justice issued in 2017 that proscribed the selling of plant-based products under dairy labels such as butter, cream, cheese or milk. The terms of France’s amendment refer to this example, saying both regulations are born of the same logic.

We are currently in discussion with the United Kingdom, Australia and New Zealand and will provide an updated document this Fall.



December 14, 2020

Steve Martin
President
Dufferin County Cattlemen's Association

**20-12
Grass-fed Beef
Standards**

Dear Steve,

The following resolution was passed at the Beef Farmers of Ontario (BFO) annual general meeting in February:

WHEREAS, we feel that more Ontario retail customers are looking for grass-finished or grass-fed beef, and

WHEREAS, we in Ontario do not currently have a definition for what grass-finished beef or grass-fed means,

THEREFORE, BE IT RESOLVED THAT BFO investigate the standards and definitions for such beef in order to prevent misleading information reaching our beef customers and to allow this market to be filled with Ontario beef produced in accordance to such standards and definitions, and also consider establishing grass-fed criteria.

The BFO Board of Directors understands your concern that standards for grass-fed and grass-finished beef products should be defined to limit the chance of misleading consumers. Grass-fed beef standards are currently not defined within legislation, but according to CFIA product labeling laws, production claims on food labels must be accurate and not mislead the consumer.

Though there are no provincial or national government standards that define grass-fed or grass-finished beef, companies must be able to substantiate any claims they make. Acceptable ways to substantiate claims are third-party audits, valid documentation, and/or non-government certification programs. All documents around production claims must be made available to a CFIA inspector upon request.

BFO does not regulate or enforce any beef industry standards, and it is up to private labels to build their own protocols that they believe to define grass-fed or grass-finished beef. An example of a private brand is Ontario Corn Fed Beef, which is organized through the Ontario Cattle Feeders' Association. The association monitors, audits, and enforces the standards outlined by the brand's product requirements. There is a grass-fed ruminant standard and certification program in Canada, developed by Pro-Cert

Certification Services. This organization administers a certification program in which farms are inspected and audited before being granted a license to use their grass-fed logo and branding. Again, they use

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their own standards for grass-fed production, which are not backed by any government regulation or legislation.

BFO does have a mandate to help companies market their beef products within the province of Ontario through the Ontario Beef Market Development Program. This program provides funding to help develop potential markets for producers and companies wishing to build their own brands. Beyond that, BFO does not interfere with private businesses and any standards they want to develop to label their products.

BFO understands the concern of having multiple, different grass-fed standards for beef, but the terms grass-fed or grass-finished, can have broad meanings. There may be complications and backlash when implementing a provincial-wide industry standard for grass-fed or grass-finished beef because it may negatively affect current operations that use their own standards. BFO will continue to leave the development of grass-fed and grass-finished standards in the hands of independent organizations, but BFO will monitor the situation and develop an action plan in the case that there is a significant problem, either on the consumer side or production side.

Thank you for bringing this resolution forward.

Sincerely,

A handwritten signature in black ink that reads "Rob Lipsett". The signature is written in a cursive, flowing style.

Rob Lipsett
President

cc: BFO Board of Directors
Mike Swidersky (Advisory Councillor, Mover)





20-13
Hay and Forage Research

May 25, 2020

Steve Martin
President
Dufferin County Cattlemen's Association

Dear Steve,

The following resolution was passed at the Beef Farmers of Ontario (BFO) annual general meeting in February:

WHEREAS, we feel that there should be more research and extension on forages in Ontario as yields have stagnated and producers require additional support in order to improve feed quality and improve overall feed resources,

THEREFORE, BE IT RESOLVED THAT BFO consider encouraging hay and forage research and extension in Ontario.

I would like to thank Dufferin County Cattlemen's Association for bringing this resolution forward. BFO agrees that hay and forage research is of the utmost importance to our industry. As such, we have taken the following actions to encourage and promote continued investment in this area.

In October 2019, the BFO Research Committee met to set research priorities for the 2019-2020 research call for proposals. Two of these priorities related to forage research, including an overarching "forage" priority and an environmental sustainability priority. In addition to these, other research priorities included areas related to forage type and quality, such as feed efficiency and animal nutrition. Nine projects have been approved for funding under the 2019-2020 research call, two of which relate directly to forage research with one additional project that relates to feed efficiency of forage-fed animals. The projects are as follows:

- An evaluation of fertility management regimes for Ontario forage species as affected by forage type/mix, number of harvests, and soil health; led by Dr. Kimberley Schneider, a recent plant science hire at the University of Guelph.
- Effects of pasture management strategies on carbon sequestration, soil health, and forage productivity for optimizing cow-calf performance using sustainable production practices; led by Dr. Ira Mandell at the University of Guelph.
- Individual variation and repeatability of fibre digestibility, gas emissions and feed efficiency in beef heifers; led by Dr. Katie Wood at the University of Guelph.



Each of the projects outlined above will result in valuable strategies for forage growth, harvest, and feeding. Additionally, these projects will result in the training of several highly qualified personnel, including graduate students, summer students, and technicians. We are excited to see this projected increase in highly qualified personnel specializing in forage research, feeding and nutrition. Forage research will continue to be a priority for the BFO-funded research program for the foreseeable future. Also of note, the Beef Cattle Research Council (BCRC) has set “Forage and Grassland Productivity” as one of its main priorities in their *Canadian Beef Research and Technology Transfer Strategy, 2018-2023*. Under their current Beef Science Cluster III Funding program, 28% of funds (over \$5.8 million) have been directed to the priority area of “environment and forages”.

With the investment in research, BFO also plans to improve producer extension initiatives. Agricultural extension is the application of scientific research and knowledge to agricultural practices through producer education. Extension allows producers to improve productivity and profitability and moves research from the lab to the field to provide a return on investment in research by translating new knowledge into innovative practices. BFO plans to work with the Livestock Research and Innovation Corporation, the University of Guelph, the Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA), Agriculture and Agri-Food Canada (AAFC), and BCRC to ensure that research results are translated into practical information that producers can implement on their farms.

In addition to the above, BFO will encourage funding agencies (OMAFRA, AAFC, BCRC) to continue to prioritize forage research. To that end, BCRC has indicated that a Research Chair position at the University of Guelph specific to forage research is in the pipeline for future funding. BFO strongly supports this initiative and is committed to bringing this endeavour to fruition.

BFO has also recently appointed new representation to the Ontario Forage Council (OFC): BFO director Joe Dickenson. The OFC is a non-profit organization dedicated to gathering and disseminating ideas and information, supporting research and development in forages, and sponsoring consolidation of forage projects. OFC acts as the primary forage information source in Ontario and we look forward to any research or extension opportunities brought forth as part of our membership.

Thank you for bringing this resolution forward. We will ensure that research results and any updates on forage research are relayed to the counties and districts as this work progresses.

Sincerely,



Rob Lipsett
President

cc: BFO Board of Directors
Mike Swidersky (mover)





**20-14
Beef Curriculum in
Classrooms**

July 7, 2020

Kevin Krakar
President
Norfolk County Cattlemen's Association

Dear Kevin,

The following resolution was passed at the Beef Farmers of Ontario (BFO) annual general meeting in February and was recently discussed by the BFO Board of Directors:

WHEREAS, consumer confidence in beef fluctuates, and
WHEREAS, our consumers get further and further from the farm, and
WHEREAS, activists targeting our classrooms with their own agendas and fake ideas, and
WHEREAS, some teacher, even in rural settings, are pushing the activist agenda calling it "AG in the classroom",
THEREFORE, BE IT RESOLVED THAT BFO work with the Ministry of Education to find a solid way to dispel the fake ideas being put in our future consumers' heads about beef and replace it with factual science-based curriculum teaching beef's benefits to health and environment.

The BFO Board of Directors wholeheartedly supports the inclusion of science-based and factual education in the classroom, and we are dedicated to increasing consumer confidence in Ontario beef through education about production, the environment, nutrition, and animal care, amongst other topics.

Consumer engagement and education remain high priorities for BFO, especially regarding the environmental impact and nutritional value of beef. We launched our new consumer-facing website this past winter, which showcases important information about the environment, animal care, antibiotic and hormone use, nutrition, and where to purchase Ontario beef, amongst other things. This new consumer website is www.ontbeef.ca. Information on the environmental value of beef and grasslands, i.e. forage and pasture land, and the nutritional value of beef is being shared by BFO through videos, articles and factsheets, and we have also been using various social media platforms including Instagram, Twitter, Facebook and Pinterest.

As part of BFO's consumer engagement initiatives, BFO pays a \$500 annual membership to AgScape (previously known as Ontario Agri-Food Education). AgScape is an Ontario organization with a mandate to provide factual, balanced, career-driven, and curriculum-linked resources and educational programs about agriculture and food production to elementary and high school classrooms. In addition, BFO provides support of \$5,000 annually to AgScape's Teacher Ambassador Program. This program allows Ontario certified teachers who are knowledgeable about agriculture to visit grades 7 to 12



classrooms and deliver lessons pertaining to the environment, animal welfare, nutrition and food safety, amongst other topics, at no cost to schools. AgScape works with various agriculture industry partners, such as OMAFRA and BFO, during the development and review of lesson plans. Additionally, AgScape maintains a working relationship with the Ontario Ministry of Education, which is highly leveraged in developing resources and lessons about agriculture that connect with Ontario schools' curriculum.

Earlier this year, a team of BFO staff and directors undertook a review of all AgScape lesson plans and resources that include content related to beef production, the environment, food safety and animal care. With the guidance provided by this team, we are sure that the information AgScape is using in classrooms is unbiased and factual, and that it adequately reflects beef production in Ontario. We also believe the lesson plans are interactive and engaging, align with the Ontario curriculum, and encourage critical thinking.

To inquire about a lesson, teachers are required to complete the request form found on the AgScape website, www.agscape.ca. AgScape will follow up with any request to confirm the booking and to discuss the lesson options that would be best suited for that classroom. We are hopeful that elementary and high school teachers will take advantage of the free AgScape lessons through the Teacher Ambassador Program, and we welcome and encourage any additional promotion of the Teacher Ambassador Program within the county/districts.

BFO's consumer engagement and producer relations teams remain highly interested in providing beef education in classroom environments. In the past, BFO staff have provided presentations, as requested, at various elementary and high schools, as well as colleges and universities. These have included the University of Guelph Ridgetown Campus, Algonquin College and Brescia University College. If there is interest in having BFO staff provide a classroom presentation about beef production, the environment, animal care, nutrition, or any other topic of interest, please contact the BFO office at 519-824-0334. We would be happy to set up a date and time to visit the classroom. This opportunity will be communicated to all county/district associations. With broader adoption of video conferencing, there is an opportunity for BFO staff to also present to classrooms virtually, if not in person.

To supplement any classroom presentations and learning, BFO offers a variety of printed and virtual resources free of charge. Resource topics include, but are not limited to, the environment, animal care, antibiotic and hormone use, and nutrition. To inquire about resources, please contact Bethany Storey, Communications Coordinator, at bethany@ontariobeef.com or 519-824-0334 extension 224.

We will continue to promote the use of science-based and factual information about beef production in classroom settings, and we welcome all opportunities in which we can engage with students about the environmental and nutritional value of beef. Thank you for bringing this resolution forward.

Sincerely,



Rob Lipsett
President

CC: BFO Board of Directors
Robert Peacock (Advisory Councillor & Seconder)





January 28, 2021

Craig Scott
President
Middlesex County Cattlemen's Association

**20-15 Manure
Storage Funding**

Dear Craig,

The following resolution from Middlesex County Cattlemen's Association was passed at the Beef Farmers of Ontario (BFO) annual general meeting in February of last year:

WHEREAS, we are noticing winter spreading of solid manure, and
WHEREAS, producers have increased knowledge and awareness of optimal soil conditions for manure application, and
WHEREAS, there is increased focus on water quality in the Great Lake Watershed,
THEREFORE, BE IT RESOLVED THAT BFO encourage OMAFRA to make manure storage to all existing livestock operations eligible under the Canadian Agricultural Partnership.

The BFO Board of Directors wholeheartedly supports this resolution. Unfortunately, no change to date has been made by the province in terms of funding eligibility under the Canadian Agricultural Partnership (CAP) program. BFO has raised this issue on several occasions in the last year with OMAFRA staff, Minister Hardeman and his office, and during many of the agricultural roundtables on red tape reduction that have occurred since the Ford government took office.

At the BFO Board of Director's January meeting, a letter was approved to be sent to OFA asking for their support on this issue. A copy of that letter has been appended for your review and information.

We will continue to advocate for the need for support for manure storage projects in our discussions regarding phosphorous loading in the Great Lakes, red tape reduction efforts, and in our general conversations with ministry and political staff on ways to support the beef sector through the CAP program. Thank you for bringing this resolution forward.

Sincerely,

Rob Lipsett
President

CC: BFO Board of Directors
Mike Conlin (Mover)
Jamie O'Shea (Advisory Councillor & Seconder)

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January 28, 2021

Ms. Peggy Brekveld, President
Ontario Federation of Agriculture
200 Hanlon Creek Boulevard
Guelph, ON N1C 0A1

Dear Peggy,

Like OFA, Beef Farmers of Ontario (BFO) spent the majority of our time and energy in 2020 focused on responding to COVID-19 related issues within our sector, including processing capacity challenges and Business Risk Management support. BFO would like to thank you and your colleagues at OFA for supporting our efforts on those two fronts in particular, and for your leadership at both the provincial and national levels throughout the pandemic.

However, we write to you today in response to several concerns that have come forward to BFO since the start of the Canadian Agricultural Partnership (CAP) in 2018, which replaced the former Growing Forward 2 Agricultural Policy Framework. As we begin to slowly transition to a post-COVID environment, and set our sights on the next Agricultural Policy Framework, we ask OFA to help raise and support some of the requests that have come forward by our members with respect to the current CAP framework, which have been outlined below. It is our hope that changes to the existing CAP framework can be made in these areas to provide more value to our sector, and the agri-food sector as a whole in Ontario.

Throughout the CAP era we have seen very few producers attempting to access the program, and even fewer successful applicants. Rather than being a catalyst for on-farm improvements, CAP is increasingly being viewed as a source of red tape, consuming extraordinary amounts of producer time, and increasingly their money, as the program's complexity has spawned a new industry of consultants who navigate the paperwork. There is also significant disparity in level of participation and application success between sectors. This is an issue that was also prevalent during the previous Growing Forward frameworks. In our assessment, much of the disparity, and overall low participation by Ontario farmers reflects the structure of the current framework, and the types of projects and eligible costs that may be incurred. We firmly believe that much more needs to be done to translate farm-level needs into program eligible activities.

BFO would also like to point out that the significant cuts made to AgriStability and AgriInvest ahead of the Growing Forward 2 framework were justified, in part, by previous FPT government's commitments to increase funding and accessibility of the non-BRM "strategic investments" component of GF2. While cuts were made to BRM one could hardly make an argument that the strategic investments portion of GF2 and CAP have delivered to farmers what was promised to them.



With respect to red tape, we've provided an overview of the amount of paperwork required to navigate the current iteration of the program:

- 69 pages of program guides
 - Protection & Assurance: 14 pages
 - Environmental Stewardship 14 pages
 - Economic Development 13 pages
 - LEADS (soil & nutrient management) 28 pages
- ~120 pages of project category descriptions
 - 64 project categories listed on between 1 to 3 pages of instructions per category
- 25 pages for typical applicant producer
 - 10 pages per project x 2 projects per application
 - 5 pages of biosecurity self-assessment
- 53 pages of biosecurity course material
- 140 pages of Growing Your Farm Profits (GYFP) course material
- 308 pages of Environmental Farm Plan (EFP) course material

Notwithstanding the administrative effort required to access funding, there are also severe limitations in the types of activities that can be funded. In an effort to reduce the administrative burden, and to provide more value to Ontario beef producers, and likely the entire agri-food sector as a whole, BFO recommends the following recommendations be raised with decision-makers in Ontario.

1. Create a technical industry-government working group to develop solutions to reduce the administrative burden for producers that apply for CAP funding, while ensuring the evaluation process supports the types of projects deemed valuable by producers, industry and government.
2. Permit funding for manure storage projects.
3. Permit funding for perimeter and interior fencing projects to spur growth in the livestock sector.
4. Allow business expansion activities to be included as part of eligible activities or dedicated projects.

We would be pleased to discuss these recommendations with you or your staff in further detail. Thank you your consideration of these requests, and again for your leadership throughout the COVID-19 pandemic.

Sincerely,



Rob Lipsett
President

cc: BFO Board of Directors
OACC





August 31, 2020

**20-16
Forage Program**

David McGonegal
President
Renfrew County Beef

Dear David,

The following resolution was passed at the Beef Farmers of Ontario (BFO) annual general meeting in February and was recently discussed by the BFO Board of Directors:

WHEREAS, the forage program does not meet the risk beef farmers find they have with early rainfalls versus late rainfalls, and
WHEREAS, early rainfalls versus late rainfalls mean lack of pasture and early feeding of cattle, and
WHEREAS, the quality and quantity of pasture and hay harvested is low which means loss of weight gain in young animals, and
WHEREAS, the program does not address the lack of rainfall for pasture and hay late in the season,
THEREFORE, BE IT RESOLVED THAT BFO lobby the provincial government to address the risk of hay and pasture shortages due to the lack of rainfall late in the season.

The BFO Board of Directors would like to thank Renfrew County Beef for bringing this resolution forward. The production and management of forages play a critical role in the success of most livestock operations, but there are risks in forage production that extend beyond the control of producers. The Ontario Forage Insurance Rainfall Program has long been criticized for its inability to adequately protect producers against the many risks that affect forage production, including but not limited to insufficient or excess rainfall.

The Forage Insurance Rainfall Program remains limited in its ability to accurately quantify and compensate production losses specific to a farming operation. To address this concern, BFO has promoted the need to develop a yield-based forage production insurance program, similar to what is offered under production insurance plans for grains, oilseed and other crop commodities. BFO has heard repeatedly from producers of the need to move away from rainfall-based insurance to the more traditional yield-based production insurance offered to other crop commodities.

The lack of individual farm insurance coverage for forages may act as a deterrent to participation and represents a source of inequity between perennial and annual crop business risk management solutions. Pasture and forage insurance programs should also be equipped with a mechanism that helps producers



account for increased feed prices during times of shortages. These program design improvements could alleviate calls for AgriRecovery during times of drought or flooding.

In an ongoing AgriRisk project, BFO and Canadian Cattlemen's Association are collaborating with Agricorp in Ontario to investigate the use of satellite technology for measuring forage yield. Satellite imagery technology used in Western Canada to quantify native grass yields is being piloted in Ontario to determine whether it can be used with pastures in Eastern Canada. The intent is to see if satellite imagery of pastures will give accurate yield data for producers or insurance providers. This project will look at data collected in the 2020 and 2021 growing seasons on tame pasture in Ontario and pasture/hay ground in Western Canada, and will allow the development of this tool to access pasture conditions remotely under various growing environments. Data collection for the project was originally planned to be completed by August 2021, but due to COVID-19 delays can be expected. Data collection is expected to begin at the end of July 2020.

Satellite imagery has the potential to allow forage insurance to be based on yield instead of rainfall. This will allow a more accurate compensation system because forage yield is affected by multiple factors, including but not exclusive to rainfall. Furthermore, remote analysis of forage yields will allow producers and organizations to monitor provincial hay and pasture production, and this will allow early identification of shortages before harvest or grazing.

BFO is looking forward to the results of the AgriRisk project to determine if satellite imagery can provide accurate yield data and whether this technology can allow for yield-based production insurance to provide an alternative to rainfall-based production forage insurance.

With both the existing Ontario Forage Insurance Rainfall Program and any future yield-based forage insurance program, BFO will be lobbying for an extension of program coverage into the fall season. We understand the need to have the end date of coverage moved from September 30 to October 31, and we will be requesting this change be made as soon as possible in order to cover fall forage production and pasture.

Thank you for bringing this resolution forward. We will keep the county/district associations updated on the progress of the AgriRisk project piloting the satellite technology and data collection in Ontario, as well as our progress in requesting an extension of the existing Ontario Forage Insurance Rainfall Program's coverage into the fall season.

Sincerely,



Rob Lipsett
President

cc: BFO Board of Directors
Gerald Rollins (Advisory Councillor)
Myles England (Seconder)





January 27th, 2021

Dave Perry
President/Advisory Councillor
Beef Farmers of Frontenac

**20-17 Provincial
Abattoirs
Sustainability**

Dear Dave,

The following resolution was passed at the Beef Farmers of Ontario (BFO) annual general meeting in February and was recently discussed by the BFO Board of Directors:

WHEREAS, it is vital that we as beef farmers and direct marketers of our beef products utilize provincial abattoirs, and
WHEREAS, it appears that most provincial abattoirs are nearing the breaking point because of added regulations down loaned from OMAFRA,
THEREFORE, BE IT RESOLVED THAT BFO directors and management become directly involved with the minister of agriculture to preserve the provincial abattoirs so that we can continue to direct market beef to the local and regional markets throughout Ontario.

The BFO Board of Directors would like to thank Beef Farmers of Frontenac for bringing this resolution forward. The sustainability of provincial abattoirs continues to be a priority for BFO, and the need to support provincial abattoirs has become even more pressing with the impact of COVID-19, which has led to further slaughter capacity issues and an increased consumer demand for local meat products.

The need for increased processing capacity, both provincially and federally, has been a key government relations priority for the Board of Directors. BFO has continued to advocate to the province for the need to increase access and availability of provincial meat inspectors and to create a funding program that would fund projects that increase processing capacity. We also continue to advocate for solutions to address the critical meat-cutter and butcher labour shortage issues.

In addition to BFO's lobbying efforts and correspondence with the province, BFO's fall 2020 pre-budget submission to the province emphasized the need to add resiliency to our supply chain, improve access to local food, and increase marketing options for farmers by creating a \$50 million "Ontario Meat Processing Growth Fund". The fund would assist processors with increasing capacity and efficiency through infrastructure support, such as cooler storage, meat-cutting equipment or other investments, and with assistance to access labour. BFO's pre-budget submission highlighted how Ontario processors are regularly operating at 100 percent capacity, which results in farmers waiting four to seven months to access a local processor, or in some instances even up to a year.

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We also provided recommendations in our pre-budget submission to address the meat-cutter and butcher labour shortage issue in Ontario. A lack of qualified and skilled labour prevents many processing facilities from taking advantage of market demands. We believe the Ontario Meat Processing Growth Fund must include a labour skills and development component, such as a wage subsidy for processors to hire and train meat-cutters and butchers.

BFO was encouraged by the \$11.5 million funding announcement at the end of November 2020 by the federal and provincial governments for meat processors and farmers. Specifically, for meat processors, the province and federal government established the “Meat Processors Improvement Initiative”, which allocated up to \$4 million for increasing provincial abattoir processing capacity. The initiative provided up to \$150,000 per project for improvements to handling and processing equipment. Though the funding offered through the initiative did not meet the level of funding we requested in our pre-budget submission, it is a step in the right direction. The provincial and federal governments acknowledged in their announcement that this is an immediate response to support Ontario’s meat processors and, although intake for that funding program closed at the end of December, is part of a longer commitment. BFO was informed that the funding for the Meat Processors Improvement Initiative was fully subscribed to, further highlighting to the government how necessary the funding is and how eager provincial processors are to increase their capacity.

In addition, BFO, Canadian Cattlemen’s Association, the Canadian Meat Council, and others have long advocated and lobbied for Specified Risk Material (SRM) harmonization with the United States. The SRM removal requirement is a costly and timely process, especially for small and medium processing facilities. Canadian processors remove 58 kilograms of SRM on OTM animals, compared to the U.S. that removes approximately 900 grams. An SRM Task Force has also been struck with industry and government representatives to look at revisions to our SRM removal requirements. BFO was the only provincial organization offered a seat at the table and BFO director Ron Stevenson has been appointed by the board to represent Ontario. In relation to SRM, Canada has submitted an application to the World Organization for Animal Health to move our BSE risk status from controlled to negligible. Canada should receive notice on our application sometime in the spring of 2021.

Lastly, BFO’s red tape reduction submission with respect to provincial abattoirs has been appended to this letter for your reference and review. BFO has used this document in discussions with the province on ways to reduce red tape at provincial abattoirs.

BFO will continue to advocate to the provincial and federal governments that additional supports for provincial abattoirs are necessary to ensure provincial abattoirs are sustainable and are able to meet local market demand. We will strive to keep our members updated on our efforts in a timely fashion.

Sincerely,



Rob Lipsett
President

cc: Gordon Young (Secorder)





Red Tape Reduction Recommendations *Meat Processing in Ontario*

Q1 - What regulations/red tape make your business less competitive?

Example 1: Inconsistent interpretation of regulations that lack transparency

Inspectors and auditors are given a guide to help them interpret how the Regulations should be implemented in the Meat Inspection Policy and Procedure Manual (MIPPM) and the Meat Plant Guidelines (MPGs). Only the MPGs are made public. Without knowing what they are being measured by, it is impossible for businesses to predict what inspectors are looking for and are therefore reliant on inspectors to tell them what to do. By relying on inspector's direction, businesses are susceptible to interpretation differences between inspectors, and this often results in increased capital costs to the business.

Recommendation(s):

- Use one set of guidelines and make them equally accessible to industry and government.
- Concentrate inspection to be about the desired outcomes. Allow businesses opportunity to innovate solutions on how to achieve those desired outcomes.

Example 2: Lack of accessibility to public service procurement

Current public service procurement guidelines add layers of complications for small and medium sized processors to be able to compete for contracts. The more regulated the system has become, the fewer small and medium sized business (particularly in the food sector) have been able to access those institutions.

Without having intimate knowledge of public institutions and their hierarchy, and even with strong understanding of how decisions are made in the public sector, it is often very difficult to find the appropriate person that makes the decisions on procurement in public sector institutions. The process to do business with the public service is convoluted and difficult to access. Contract processes are next to impossible to find and often too complicated for most businesses to figure out how to apply. Many institutions only contract distributors or large food service contractors. These companies generally only buy from other equally large processors. This practically eliminates opportunities for small and medium sized businesses to enter the market place.

Summary of Barriers:

- Lack of access to appropriate contacts for public institution employees in food service
- Lack of access to when and where procurement documents are released
- Procurement models that make it next to impossible for small and medium sized businesses to compete

Recommendation(s):

- Create an easy to find directory or list to find appropriate procurement contact at each institution
- Create an easy to access and free public directory for BPS food contracts and list of when existing contracts are expiring.

- Create a two-tier procurement process that includes a step to select the products first, and second process to select the distributor who will deliver the products (similar model used by MealSource in the healthcare sector).

Example 3: Licensing requirements create undue regulatory burden

Plants must inform OMAFRA a minimum of 30-days in advance of any alterations that fit subsections of the Meat Regulation under the *Food Safety and Quality Act, 2001*.

While we agree that the plant must inform their inspector of any “alterations” that fit subsections 12(2)(a)(b)(c) the minimum 30-day time period to notify OMAFRA of any change must be removed.

The requirement for 30-day notification when “any other significant change to the plant or its premises, facilities or equipment” restricts a plant operator’s ability to respond quickly to issues related to building and property maintenance, especially those noted during compliance audits. For example, a plant operator wants to pave the driveway and shipping and receiving areas before winter but is told he could not because he did not give OMAFRA 30 days notice, leaving the yard unpaved, full of potholes and standing water over the winter.

The 30-day notification when “a significant change in the licensed activities that are carried on at the plant or the manner in which the activities are carried on” stagnates industry innovation, the ability to be nimble, stifles growth and competitiveness and inhibits new business opportunities. For example, if a plant operator wishes to implement a beef carcass intervention, they would be required to give 30 days notice to OMAFRA prior to installation and implementation. This is 30 days of slaughter in which an intervention could have been applied, the risk of contamination reduced if not eliminated.

As well, the requirement for the submission of plans and specifications, similar to what is required for plant seeking licensing, is onerous, time-consuming and expensive for plant operators, especially in circumstances where the inspection authority is requesting changes or additions to blueprints that have no impact on food safety or regulatory compliance. It is our recommendation that blueprints are only required when there is a significant, physical alteration to the building where a building permit is required.

Recommendation(s):

- Only require blueprints when there is a significant, physical alteration to the building where a building permit is required.
- Remove the minimum 30-day notice requirement when alterations are made to a plant.

Example 4: Adopt the CFIA standard for minimum lighting requirements

CFIA is no longer prescribing the lux of the lighting (minimum illumination requirements) but have moved towards more outcome-based requirements. If OMAFRA moved to this type of approach the cost of building new plants, or cost of renovating existing plants would be reduced.

Recommendation(s):

- Adopt the CFIA standard for lighting requirements in plants, which states:
63 (1) An establishment must be equipped with natural or artificial lighting that is appropriate for the food or the food animal that is intended to be slaughtered, as the case may be, and for the activity being conducted.

Q2 - What are the challenges and opportunities for economic growth in the northern meat processing industry?

Issue 1: Access to Labour

Access to skilled and unskilled labour, be that domestic or foreign, is a critical need for the sector. Programs that can assist processors address existing and future labour shortages would be welcomed.

Issue 2: Access to Markets

Provincially inspected meat processing plants are limited to intra-provincial trade. There is opportunity to grow the sector by allowing cross-border access to other provincial markets. For processors close to the border, this could assist processors marketing meat products across provincial boundaries, as well as producers looking for custom processing services.

Recommendation(s):

- Create an inter-provincial processing pilot between Ontario-Quebec, and Ontario-Manitoba among a group of interested facilities in each province.

Issue 3: Labour Disruptions

In 1996, a labour disruption in the public sector had catastrophic effect on the meat processing facilities as they were mandated to shut down for the entire duration of the strike. The loss of business and effect on the industry is still being felt today. Since then, nothing has been done to ensure that provincial meat plants can carry on their business without the threat of government shutting them down because of their own labour disruptions. The Essential Services Agreement dated May 10, 1995 states that “Meat Inspection Service is designated as an essential service.” However, the decision goes on to provide that the “Ministry shall not provide any and all meat inspection services at slaughter to licensed plant operators, during the period of a strike or lockout of the Administrative Bargaining Unit. Slaughter operations at provincially licensed premises shall be shut down”.

Recommendation(s):

- Ensure that the Essential Services Agreement does not prohibit the function and operation of businesses in Ontario at ANY time.

Q3 - How can government and industry best work together to accelerate growth in the provincial meat processing industry?

Put an end to funding programs that select winners and losers, and funding projects that have no value other than to the company that receives the funding. Provide funding to groups of companies and organizations working collaboratively to solve an issue. The federal government did this to a small scale with their innovation funding, forcing collaboratives of small, medium and large organizations to work with a non-profit to oversee the project execution.

Funding could be provided to conduct a line-by-line assessment of how to effectively eliminate burdensome regulations. Research time would be required to meet with and interview business owners to identify duplicative regulations, and to identify ways to shift from regulation to outcome-based incentives for the sector. The project would identify training requirements for the sector, financial burden to implement changes, and suggested methods and timelines to implement change.

Funding programs should evolve to include a mix of financing options besides grants, such as revolving loan funds. Risk takers should be supported first, followed by innovators, and finally general supports for those that want to catch up to those that have led the way. Increased contribution percentages can be given to businesses that collaborate with other businesses in their sector. The introduction of revolving loan programs will ensure that there is financing available today and tomorrow for continued support of the sector.

	Start-Ups, Micro Businesses	Small Businesses	Medium Businesses	Large Businesses
Years operation	Up to 2 years	2-5 years	5-15 years	15 +
Sales	\$100,000 - \$1,000,000	\$100,000 – \$2,000,000	\$2,000,000 – \$10,000,000	\$10,000,000 +
# Employees	1-5	3-10	11-100	100+
Project Size	Up to \$50,000	Up to \$100,000	Up to \$500,000	\$1,000,000 +
Risk takers	Up to 90%	75% grants	50% grants	25% grants with upper limit
Innovators	Up to 75%	50% grants Loan options	30-50% grants Loan options	10—30% grants
Followers	Up to 30% Loan options	Small grant 25% Loan options	Loan options	NA

Funding programs should be designed to be focused on desired outcomes such as increased self-regulation, reduction of paperwork and streamlined reporting for duplicative approval processes. Businesses could use the program to develop self-monitored food safety programs and modernize operations through the development and implementation of technologies.

At the conclusion of funding programs, an assessment should be conducted on the effectiveness of the programs. The analysis should include a sharing of achievements and a review of gaps that still exist. The program can then decide to conclude, or evolve to focus on remaining gaps, decrease overall project sizes, and/or increase industry’s contributions towards future projects.

Q4 - Were you aware of the recent food safety funding programs available under the Canadian Agricultural Partnership? Did you have any challenges with the application process?

Very few processors are attempting to access the current CAP program, and even fewer are successful. Rather than being a catalyst for plant improvements, CAP is increasingly being viewed as a source of red tape, consuming extraordinary amounts of applicant time, and increasingly their money, as the program’s complexity has spawned a new industry of consultants who navigate the paperwork.

Recommendation(s):

- Allow business expansion activities to be included as part of eligible activities or dedicated projects.
- Create a technical industry-government working group to develop solutions to reduce the administrative burden for applicants that apply for CAP funding, while ensuring the evaluation process supports the types of projects deemed valuable by processors, industry and government.

Q5 - Do you have any recommendations for how we may improve outreach to industry with regards to available food safety supports? This may include your ability to access information about funding programs, Microbial Control Interventions, or Meat Plant Guidelines, etc.

We have several concerns with the current microbiological baseline study being conducted in provincially licensed meat plants that slaughter beef and veal. There are many challenges that have been identified with communication, sampling collection, integrity of the samples from collection through transportation, disposition of carcasses etc. which call into question the integrity of the entire study. We are not supportive of the baseline project moving to a Routine Monitoring or Surveillance program within OMAFRA without significant review of the outcomes of the current project and industry consultation.

Recommendation(s):

- Halt plans to implement a Routine Monitoring or Pathogen Surveillance program until a significant review of the outcomes of the current baseline study have been reviewed in consultation with industry.

The Beef Farmers of Ontario represent 19,000 beef producers in Ontario by advocating in the areas of sustainability, animal health and care, environment, food safety, and domestic and export market development. BFO's vision is help foster a sustainable and profitable beef industry, and have Ontario beef recognized as an outstanding product by our consumers.





October 26, 2020

**20-18
Breeder Co-ops**

Kim Weedmark
President
Grenville County Cattlemen's Association

Dear Kim,

The following resolution was passed at the Beef Farmers of Ontario (BFO) annual general meeting in February:

WHEREAS, there are eight breeder co-ops serving primarily geographically specific locations, and
WHEREAS, these co-ops provide a great funding opportunity to expanding and beginning cow calf operations, and
WHEREAS, certain underserved areas fall outside the coverage of administrators and supervisors for existing groups, and
WHEREAS, specific attempts to join co-ops have met with long delays and lack of response and communication,
THEREFORE, BE IT RESOLVED THAT BFO work towards a structure for co-ops that allows for underserved areas and new additions to be covered by the same lending criteria that the current Breeder co-ops provide.

The BFO Board of Directors understands the vital role the Breeder Loan Program plays in the sustainability of the Ontario beef industry, and recognizes the issue of underserved areas within the program. There are currently eight breeder loan co-ops across Ontario.

The Breeder Loan Program aims to serve the Ontario cow-calf sector by providing affordable loans for purchasing breeding females, and it helps producers who cannot secure funding at traditional lending institutions or cannot secure affordable lending rates. The program is meant to help maintain and grow the Ontario cow herd, and it's an important tool for young producers and new entrants to the industry.

The program's current structure allows for stability and security, which maintains the program's credibility and accountability. However, we recognize there are areas in which the program could be improved. Some producers may not know the board members on their local co-op board, and some producers may be disadvantaged if they are further away from inspectors since it is more time-consuming to inspect cattle on the border areas of the co-ops.



Co-op boards work independently, which allows them the final say on all matters when extending credit to producers, and they operate much like any other business that provides financing. Therefore, producers' direct appeals should be made to the specific breeder co-op board from which the producer is applying for a loan. The independence of the co-ops limits the scope of BFO's involvement, though BFO does maintain a vigilant lookout to ensure the co-ops are working for producers.

BFO is currently exploring options for a formal appeals process for producers who feel that the reasoning behind their failed application was insufficient or inaccurate. Investigating the potential for a formal appeals process should help determine if such a policy is needed in the co-ops to maintain their security while also increasing access to the co-ops. Any appeal process would be designed to increase the transparency of the breeder co-ops and discourage discrimination against producers for various reasons.

The BFO is always available for producers to contact for information and direction on what Co-Op board they need to approach. The BFO will also help introduce producers to the nearest Co-Op if they are in zones that fall outside of the traditional borders of the current Co-Ops. Being able to help producers connect to a Breeder Co-Op is important to the BFO as we strive to help all beef producers in the Province.

Access to affordable loans for producers to grow and maintain their cow herd is key to the Ontario cow-calf sector's economic viability and sustainability. BFO is committed to improving the Breeder Loan Program for producers in a way that not only allows for easier access by producers, but also strengthens the program. We will strive to keep the county/district associations updated on BFO's investigation into potential improvements to the program, including a formal appeals process for producers.

Sincerely,



Rob Lipsett
President

cc: BFO Board of Directors
Gordon Conklin (Advisory Councillor)
Emma Jelly (Mover)





January 27th, 2021

Kim Weedmark
President
Grenville County Cattlemen's Association

**20-19 Provincial
Abattoirs Red
Tape and Labour**

Dear Kim,

The following resolution was passed at the Beef Farmers of Ontario (BFO) annual general meeting in February and was recently discussed by the BFO Board of Directors:

WHEREAS, small local community Abattoirs are finding it financially challenging to function under continually changing government regulations, and
WHEREAS, small local community Abattoirs are having difficulty attracting qualified skilled staff, and
WHEREAS, small local community Abattoirs provide much needed service to local beef producers in promoting and providing consumers with Ontario/Canadian beef, and
WHEREAS, because of above challenges, small community Abattoirs, are forced to terminate their businesses, causing increased demands to the few remaining Abattoirs and longer wait times for processing animals,
THEREFORE, BE IT RESOLVED THAT BFO work towards lobbying the provincial government to reduce red tape, thus providing more expansion opportunities, and helping to utilize existing processing facilities, as well as starting a pilot project to attract and train qualified personnel to work in these Abattoirs.

The BFO Board of Directors would like to thank Grenville County Cattlemen's Association for bringing this resolution forward. The sustainability of provincial abattoirs continues to be a priority for BFO, and the need to support provincial abattoirs has become even more pressing with the impact of COVID-19, which has led to further slaughter capacity issues and an increased consumer demand for local meat products.

The need for increased processing capacity, both provincially and federally, has been a key government relations priority for the Board of Directors. BFO has continued to advocate to the province for the need to increase access and availability of provincial meat inspectors and to create a funding program that would fund projects that increase processing capacity. We also continue to advocate for solutions to address the critical meat-cutter and butcher labour shortage issues.

In addition to BFO's lobbying efforts and correspondence with the province, BFO's fall 2020 pre-budget submission to the province emphasized the need to add resiliency to our supply chain, improve access

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to local food, and increase marketing options for farmers by creating a \$50 million “Ontario Meat Processing Growth Fund”. The fund would assist processors with increasing capacity and efficiency through infrastructure support, such as cooler storage, meat-cutting equipment or other investments, and with assistance to access labour. BFO’s pre-budget submission highlighted how Ontario processors are regularly operating at 100 percent capacity, which results in farmers waiting four to seven months to access a local processor, or in some instances even up to a year.

We also provided recommendations in our pre-budget submission to address the meat-cutter and butcher labour shortage issue in Ontario. A lack of qualified and skilled labour prevents many processing facilities from taking advantage of market demands. We believe the Ontario Meat Processing Growth Fund must include a labour skills and development component, such as a wage subsidy for processors to hire and train meat-cutters and butchers.

BFO was encouraged by the \$11.5 million funding announcement at the end of November 2020 by the federal and provincial governments for meat processors and farmers. Specifically, for meat processors, the province and federal government established the “Meat Processors Improvement Initiative”, which allocated up to \$4 million for increasing provincial abattoir processing capacity. The initiative provided up to \$150,000 per project for improvements to handling and processing equipment. Though the funding offered through the initiative did not meet the level of funding we requested in our pre-budget submission, it is a step in the right direction. The provincial and federal governments acknowledged in their announcement that this is an immediate response to support Ontario’s meat processors and, although intake for that funding program closed at the end of December, is part of a longer commitment. BFO was informed that the funding for the Meat Processors Improvement Initiative was fully subscribed to, further highlighting to the government how necessary the funding is and how eager provincial processors are to increase their capacity.

In addition, BFO, Canadian Cattlemen’s Association, the Canadian Meat Council, and others have long advocated and lobbied for Specified Risk Material (SRM) harmonization with the United States. The SRM removal requirement is a costly and timely process, especially for small and medium processing facilities. Canadian processors remove 58 kilograms of SRM on OTM animals, compared to the U.S. that removes approximately 900 grams. An SRM Task Force has also been struck with industry and government representatives to look at revisions to our SRM removal requirements. BFO was the only provincial organization offered a seat at the table and BFO director Ron Stevenson has been appointed by the board to represent Ontario. In relation to SRM, Canada has submitted an application to the World Organization for Animal Health to move our BSE risk status from controlled to negligible. Canada should receive notice on our application sometime in the spring of 2021.

In regards to starting a pilot project to attract and train meat-cutters and butchers, BFO has been in contact with colleges and industry organizations in Ontario to gain a better understanding of any current or future meat-cutting education programs. Aside from the current programs at Fanshawe College and the Seaway Valley Meat Cutting Institute, Canadore College, Mohawk College and Durham College are developing programs or intensive courses for meat-cutting/butchery that are expected to begin in 2021. Meat and Poultry Ontario (MPO) is also very engaged in addressing labour shortage issues in the sector and has been developing a meat-cutting training initiative in Ontario. MPO is planning to establish a “Meat-Tech Centre of Excellence” that will include a meat-cutter/butchery certificate program, and is also planning to conduct a pilot project for its meat-cutting program.



Lastly, BFO's red tape reduction submission with respect to provincial abattoirs has been appended to this letter for your reference and review. BFO has used this document in discussions with the province on ways to reduce red tape at provincial abattoirs.

BFO will continue to advocate to the federal and provincial governments that additional supports for provincial abattoirs are necessary to ensure provincial abattoirs are sustainable, able to meet local market demand, and able to hire qualified staff.

Sincerely,

A handwritten signature in black ink that reads "Rob Lipsett". The signature is written in a cursive, slightly slanted style.

Rob Lipsett
President

cc: Emma Jelly (mover)
Jason Middlemiss (seconder)
Gordon Conklin (Advisory Councillor)





Red Tape Reduction Recommendations *Meat Processing in Ontario*

Q1 - What regulations/red tape make your business less competitive?

Example 1: Inconsistent interpretation of regulations that lack transparency

Inspectors and auditors are given a guide to help them interpret how the Regulations should be implemented in the Meat Inspection Policy and Procedure Manual (MIPPM) and the Meat Plant Guidelines (MPGs). Only the MPGs are made public. Without knowing what they are being measured by, it is impossible for businesses to predict what inspectors are looking for and are therefore reliant on inspectors to tell them what to do. By relying on inspector's direction, businesses are susceptible to interpretation differences between inspectors, and this often results in increased capital costs to the business.

Recommendation(s):

- Use one set of guidelines and make them equally accessible to industry and government.
- Concentrate inspection to be about the desired outcomes. Allow businesses opportunity to innovate solutions on how to achieve those desired outcomes.

Example 2: Lack of accessibility to public service procurement

Current public service procurement guidelines add layers of complications for small and medium sized processors to be able to compete for contracts. The more regulated the system has become, the fewer small and medium sized business (particularly in the food sector) have been able to access those institutions.

Without having intimate knowledge of public institutions and their hierarchy, and even with strong understanding of how decisions are made in the public sector, it is often very difficult to find the appropriate person that makes the decisions on procurement in public sector institutions. The process to do business with the public service is convoluted and difficult to access. Contract processes are next to impossible to find and often too complicated for most businesses to figure out how to apply. Many institutions only contract distributors or large food service contractors. These companies generally only buy from other equally large processors. This practically eliminates opportunities for small and medium sized businesses to enter the market place.

Summary of Barriers:

- Lack of access to appropriate contacts for public institution employees in food service
- Lack of access to when and where procurement documents are released
- Procurement models that make it next to impossible for small and medium sized businesses to compete

Recommendation(s):

- Create an easy to find directory or list to find appropriate procurement contact at each institution
- Create an easy to access and free public directory for BPS food contracts and list of when existing contracts are expiring.

- Create a two-tier procurement process that includes a step to select the products first, and second process to select the distributor who will deliver the products (similar model used by MealSource in the healthcare sector).

Example 3: Licensing requirements create undue regulatory burden

Plants must inform OMAFRA a minimum of 30-days in advance of any alterations that fit subsections of the Meat Regulation under the *Food Safety and Quality Act, 2001*.

While we agree that the plant must inform their inspector of any “alterations” that fit subsections 12(2)(a)(b)(c) the minimum 30-day time period to notify OMAFRA of any change must be removed.

The requirement for 30-day notification when “any other significant change to the plant or its premises, facilities or equipment” restricts a plant operator’s ability to respond quickly to issues related to building and property maintenance, especially those noted during compliance audits. For example, a plant operator wants to pave the driveway and shipping and receiving areas before winter but is told he could not because he did not give OMAFRA 30 days notice, leaving the yard unpaved, full of potholes and standing water over the winter.

The 30-day notification when “a significant change in the licensed activities that are carried on at the plant or the manner in which the activities are carried on” stagnates industry innovation, the ability to be nimble, stifles growth and competitiveness and inhibits new business opportunities. For example, if a plant operator wishes to implement a beef carcass intervention, they would be required to give 30 days notice to OMAFRA prior to installation and implementation. This is 30 days of slaughter in which an intervention could have been applied, the risk of contamination reduced if not eliminated.

As well, the requirement for the submission of plans and specifications, similar to what is required for plant seeking licensing, is onerous, time-consuming and expensive for plant operators, especially in circumstances where the inspection authority is requesting changes or additions to blueprints that have no impact on food safety or regulatory compliance. It is our recommendation that blueprints are only required when there is a significant, physical alteration to the building where a building permit is required.

Recommendation(s):

- Only require blueprints when there is a significant, physical alteration to the building where a building permit is required.
- Remove the minimum 30-day notice requirement when alterations are made to a plant.

Example 4: Adopt the CFIA standard for minimum lighting requirements

CFIA is no longer prescribing the lux of the lighting (minimum illumination requirements) but have moved towards more outcome-based requirements. If OMAFRA moved to this type of approach the cost of building new plants, or cost of renovating existing plants would be reduced.

Recommendation(s):

- Adopt the CFIA standard for lighting requirements in plants, which states:
63 (1) An establishment must be equipped with natural or artificial lighting that is appropriate for the food or the food animal that is intended to be slaughtered, as the case may be, and for the activity being conducted.

Q2 - What are the challenges and opportunities for economic growth in the northern meat processing industry?

Issue 1: Access to Labour

Access to skilled and unskilled labour, be that domestic or foreign, is a critical need for the sector. Programs that can assist processors address existing and future labour shortages would be welcomed.

Issue 2: Access to Markets

Provincially inspected meat processing plants are limited to intra-provincial trade. There is opportunity to grow the sector by allowing cross-border access to other provincial markets. For processors close to the border, this could assist processors marketing meat products across provincial boundaries, as well as producers looking for custom processing services.

Recommendation(s):

- Create an inter-provincial processing pilot between Ontario-Quebec, and Ontario-Manitoba among a group of interested facilities in each province.

Issue 3: Labour Disruptions

In 1996, a labour disruption in the public sector had catastrophic effect on the meat processing facilities as they were mandated to shut down for the entire duration of the strike. The loss of business and effect on the industry is still being felt today. Since then, nothing has been done to ensure that provincial meat plants can carry on their business without the threat of government shutting them down because of their own labour disruptions. The Essential Services Agreement dated May 10, 1995 states that “Meat Inspection Service is designated as an essential service.” However, the decision goes on to provide that the “Ministry shall not provide any and all meat inspection services at slaughter to licensed plant operators, during the period of a strike or lockout of the Administrative Bargaining Unit. Slaughter operations at provincially licensed premises shall be shut down”.

Recommendation(s):

- Ensure that the Essential Services Agreement does not prohibit the function and operation of businesses in Ontario at ANY time.

Q3 - How can government and industry best work together to accelerate growth in the provincial meat processing industry?

Put an end to funding programs that select winners and losers, and funding projects that have no value other than to the company that receives the funding. Provide funding to groups of companies and organizations working collaboratively to solve an issue. The federal government did this to a small scale with their innovation funding, forcing collaboratives of small, medium and large organizations to work with a non-profit to oversee the project execution.

Funding could be provided to conduct a line-by-line assessment of how to effectively eliminate burdensome regulations. Research time would be required to meet with and interview business owners to identify duplicative regulations, and to identify ways to shift from regulation to outcome-based incentives for the sector. The project would identify training requirements for the sector, financial burden to implement changes, and suggested methods and timelines to implement change.

Funding programs should evolve to include a mix of financing options besides grants, such as revolving loan funds. Risk takers should be supported first, followed by innovators, and finally general supports for those that want to catch up to those that have led the way. Increased contribution percentages can be given to businesses that collaborate with other businesses in their sector. The introduction of revolving loan programs will ensure that there is financing available today and tomorrow for continued support of the sector.

	Start-Ups, Micro Businesses	Small Businesses	Medium Businesses	Large Businesses
Years operation	Up to 2 years	2-5 years	5-15 years	15 +
Sales	\$100,000 - \$1,000,000	\$100,000 – \$2,000,000	\$2,000,000 – \$10,000,000	\$10,000,000 +
# Employees	1-5	3-10	11-100	100+
Project Size	Up to \$50,000	Up to \$100,000	Up to \$500,000	\$1,000,000 +
Risk takers	Up to 90%	75% grants	50% grants	25% grants with upper limit
Innovators	Up to 75%	50% grants Loan options	30-50% grants Loan options	10—30% grants
Followers	Up to 30% Loan options	Small grant 25% Loan options	Loan options	NA

Funding programs should be designed to be focused on desired outcomes such as increased self-regulation, reduction of paperwork and streamlined reporting for duplicative approval processes. Businesses could use the program to develop self-monitored food safety programs and modernize operations through the development and implementation of technologies.

At the conclusion of funding programs, an assessment should be conducted on the effectiveness of the programs. The analysis should include a sharing of achievements and a review of gaps that still exist. The program can then decide to conclude, or evolve to focus on remaining gaps, decrease overall project sizes, and/or increase industry’s contributions towards future projects.

Q4 - Were you aware of the recent food safety funding programs available under the Canadian Agricultural Partnership? Did you have any challenges with the application process?

Very few processors are attempting to access the current CAP program, and even fewer are successful. Rather than being a catalyst for plant improvements, CAP is increasingly being viewed as a source of red tape, consuming extraordinary amounts of applicant time, and increasingly their money, as the program’s complexity has spawned a new industry of consultants who navigate the paperwork.

Recommendation(s):

- Allow business expansion activities to be included as part of eligible activities or dedicated projects.
- Create a technical industry-government working group to develop solutions to reduce the administrative burden for applicants that apply for CAP funding, while ensuring the evaluation process supports the types of projects deemed valuable by processors, industry and government.

Q5 - Do you have any recommendations for how we may improve outreach to industry with regards to available food safety supports? This may include your ability to access information about funding programs, Microbial Control Interventions, or Meat Plant Guidelines, etc.

We have several concerns with the current microbiological baseline study being conducted in provincially licensed meat plants that slaughter beef and veal. There are many challenges that have been identified with communication, sampling collection, integrity of the samples from collection through transportation, disposition of carcasses etc. which call into question the integrity of the entire study. We are not supportive of the baseline project moving to a Routine Monitoring or Surveillance program within OMAFRA without significant review of the outcomes of the current project and industry consultation.

Recommendation(s):

- Halt plans to implement a Routine Monitoring or Pathogen Surveillance program until a significant review of the outcomes of the current baseline study have been reviewed in consultation with industry.

The Beef Farmers of Ontario represent 19,000 beef producers in Ontario by advocating in the areas of sustainability, animal health and care, environment, food safety, and domestic and export market development. BFO's vision is help foster a sustainable and profitable beef industry, and have Ontario beef recognized as an outstanding product by our consumers.





20-20
Advance Payments Program

October 26, 2020

Chris MacFarlane
President, Peterborough County Cattlemen's Association

Dear Chris,

The following resolution was passed at the Beef Farmers of Ontario (BFO) annual general meeting in February:

WHEREAS, costs of running an agricultural business continue to grow,
THEREFORE, BE IT RESOLVED THAT BFO work with other farm organizations to lobby an increase of the interest free portion of the Advance Payments Program from the Agriculture Credit Corporation.

I would like to thank Peterborough County Cattlemen's Association for bringing this resolution forward. The BFO Board of Directors supports this resolution. In response, Ontario directors to the Canadian Cattlemen's Association (CCA) presented a motion that was carried at the CCA semi-annual meeting in August requesting that CCA lobby the federal government to increase the interest-free portion of the Advance Payments Program (APP) from \$100,000 to \$500,000, to align with the increase that canola growers received in 2019. CCA has adopted this position in its updated policy book. Unfortunately, no movement by the government to enact this change has occurred to date.

BFO will continue to advocate for the need to increase the interest-free portion of the APP in discussions with our partners at the CCA, and in discussions that BFO has with government and elected officials at the federal level.

Thank you for bringing this resolution forward.

Sincerely,

Rob Lipsett
President

Cc: BFO Board of Directors
John Lunn (AC/Mover)
Mike Telford (Seconder)
Bob Lowe, CCA President
Brady Stadnicki, CCA Manager of Policy and Programs
Fawn Jackson, CCA Director of Government and International Relations

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