



June 16, 2023

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To Whom It May Concern:

**Re: Response to the Canada Gazette, Part 1, Volume 157, Number 11: Regulations Amending the Health of Animals Regulations (Identification and Traceability)**

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Beef Farmers of Ontario (BFO) represents the 19,000 beef farmers in Ontario by advocating in the areas of sustainability, animal health and care, environment, food safety, and domestic and export market development. BFO appreciates the opportunity to comment on *Regulations Amending the Health of Animals Regulations (Identification and Traceability)* to enable a more effective and timely response to disease outbreaks and food safety issues, and improve support for disease surveillance activities. We agree that the proposed amendments should strengthen Canada's ability to respond quickly to animal health threats and other emergencies.

BFO recognizes the importance of livestock traceability especially when it comes to mitigating the risks and impact from disease outbreaks such as foot and mouth disease (FMD) and protecting the health of Canadians. We support expanding traceability to cervids and goats that share diseases with other regulated livestock.

BFO supports the proposed change to require Premises Identification Numbers (PIDs) when reporting movement of livestock as PIDs provide important information related to sites where livestock are kept, assembled, or disposed of, and enables the rapid and accurate determination of the departure or destination points of animals. However, we are concerned that several of the proposed amendments in this consultation will negatively impact our sector.

It is proposed that the livestock industry would assume the costs associated with reading, collecting and reporting of traceability-related data and information, the purchase and application of approved animal indicators, premises identification and learning new information obligations

because of regulatory changes. On behalf of Ontario's beef farmers, BFO has very strong concerns regarding the cost the proposed regulations will have on our sector.

As stated in the published cost benefit analysis, the cost of these regulations is disproportionately high for the cattle sector. It is assumed that there will be no requirement to purchase a radio-frequency identification (RFID) reader to be compliant with regulations. We disagree with this assumption as many operations that handle cattle will require a reader for accuracy, efficiency, and occupational safety.

There are technology gaps and limitations that will make implementing these regulations logistically challenging and costly. This is especially true for communities within our sector that are not able to utilize technology due to their religious beliefs, which will result in paper-based reporting or require a third party to collect data and report it electronically. Paper-based reporting will be slow, error ridden, and will result in increased costs for the responsible administrator, which will be passed on to primary producers through tag costs.

There will be a need to develop data handling technology to collect, report, and share data in a verified, secure, and efficient manner. This data must be shared with the trusted regulator and with transporters, buyers, and processors to provide the departure data for move-in reporting. Without technology advancements, the proposed regulations will demand significant ongoing time in generating paper records for producers, and result in increased labour fees for the responsible administrator. The latter cost will more than likely be passed on to primary producers in the form of higher tag costs. Even with technology improvements, the costs of maintenance and delivery of these solutions is not insignificant and will fall on producers via tag costs.

Therefore, we support the use of funding programs and grants to offset the costs not only for infrastructure and capital purchases farmers will need to make, but also for educating farmers on the regulations and use of new technology to ensure compliance. We look forward to working with our members to see them implemented, and once finalized we request a two-year grace period for them to learn and adopt the new regulations in order to achieve compliance.

The beef sector is supportive of move-in movement reporting for cattle and appreciates the consideration of our business structures in terms of speed of commerce and ability to comply. While we agree that 30-60 days is too long for reporting, BFO recommends a 14-day reporting window, as opposed to the proposed seven-day timeframe. Common business practice in Ontario is to process cattle only once full pens have been established, to reduce labour costs and cattle handling events; this is a time when movement-in reporting would likely occur. Unlike the majority of operations in western Canada, Ontario operations typically require more than seven calendar days to fill pens, given smaller volumes and more infrequent trade. In addition, Ontario is home to many small processors and auctions that operate on a limited basis and at a small scale with limited labour capacity. While a seven-day reporting requirement would assist in disease management, the realities of the Ontario beef production system would make it difficult to achieve compliance without negatively affecting normal speed of commerce.

With the increase of dairy x beef cattle entering the beef supply chain, there will be a need for an arrangement between the Canadian Cattle Identification Agency (CCIA) and DairyTrace, as CCIA is not the responsible administrator for white tagged animals. For Quebec cattle, we also need to ensure that Agri-Traçabilité Québec (ATQ) and CCIA can communicate between their databases.

We propose that tagging sites include backgrounding lots, feedlots, and veterinary clinics and that those sites would administer tags linked to the premises of departure of the animals. Logistically, this means that the animals would be transported with the approved indicators on hand to be applied at arrival. Regulations could be considered that would limit time between arrival and tagging and/or that required additional reporting to document the situation. These comments would also apply to situations where animals are temporarily at a site for the purposes of a show or exhibition as fairs, exhibitions and 4H clubs are important to our culture and industry. BFO is supportive of the exemption proposed by the Canadian fairs, exhibitions, and agricultural societies that owners are responsible for providing and applying approved indicators, issued to the farm of origin, to be applied to animals should a tag be lost or removed while on the fair, exhibition or agricultural society site. This clarification seems to align with the goals of traceability, will foster compliance, and maintain the responsibility for enabling traceability with livestock producers.

There are several sections of the current and proposed regulations that will affect agricultural societies, but the section of the proposed regulations they feel will have the most significant effect on agricultural societies and their volunteer workload is related to animal movement as the operator of a destination site. Similar to moving cattle to and from a community pasture, the reporting of movement to and from fairgrounds should be the responsibility of the farm of origin (owner of the animal). The burden of collecting and reporting this information should not fall upon agricultural societies.

BFO recognizes the importance of livestock traceability to mitigate the risks and impact from disease outbreaks and to protect the health of Canadians and appreciate the opportunity to provide our feedback on *Regulations Amending the Health of Animals Regulations (Identification and Traceability)*. We are supportive of improved traceability and our comments are intended to identify some concerns and gaps in the proposed regulations with the hope they will be taken into consideration before the regulations are finalized.

Sincerely,

A handwritten signature in black ink, appearing to read "Jack Chaffe". The signature is fluid and cursive, with a long, sweeping underline that extends to the left.

Jack Chaffe  
BFO President