



July 29, 2026

Canadian Food Inspection Agency (CFIA)
1400 Merivale Rd.
Ottawa, ON, K1A 0Y9

Sent via email: cfia.internaltrade-commerceinterieur.acia@inspection.gc.ca

To whom it may concern,

Re: Canada Gazette, Part I, Volume 160, Number 26: Regulations Amending the Safe Food for Canadians Regulations (Unmet Slaughter Capacity)

The Beef Farmers of Ontario (BFO) appreciates the Government of Canada's continued efforts to reduce barriers to interprovincial trade and improve access to slaughter and processing services for livestock producers. Increased regulatory flexibility has long been identified by industry as an opportunity to strengthen Canada's domestic food system, improve livestock transportation logistics, and provide producers with greater flexibility while maintaining Canada's high food safety standards.

BFO supports the intent of the proposed amendments. However, we question whether the regulatory approach proposed will meaningfully improve producer access to slaughter services or reduce interprovincial trade barriers in practice.

The proposed framework appears unnecessarily restrictive for what is expected to be a relatively small volume of livestock. Requiring CFIA oversight, limiting participation to narrowly defined pilot regions, and only permitting cross-border slaughter where an unmet provincial slaughter capacity has been demonstrated creates a level of administrative burden that is unlikely to encourage participation or materially improve access for livestock producers.

If the objective is to provide producers with practical access to slaughter services, a more effective approach would be to permit reciprocal access to custom slaughter services across provincial boundaries, provided the meat is returned to the owner's home province for sale or personal use in accordance with that province's existing regulatory framework.

In these circumstances, the meat is not entering the commercial marketplace of the province where slaughter occurred. Rather, it is simply crossing a provincial boundary to access a processing service before returning to the producer's home jurisdiction, where it remains subject to that province's existing rules governing sale and distribution. Treating these situations in the same manner as broader interprovincial commercial meat trade introduces unnecessary complexity without a corresponding food safety benefit.

BFO also questions the rationale for limiting the proposed pilot to narrowly prescribed geographic regions. For example, the proposed Ontario-Quebec pilot focuses primarily on the

Temiskaming region despite the existence of processing capacity elsewhere along the Ontario-Quebec border, including the Ottawa Valley. Livestock producers located near these areas face the same transportation challenges, animal welfare considerations, and processing capacity constraints, yet would receive no benefit from the proposed amendments.

More broadly, producers seek slaughter services based on proximity, processor availability, transportation costs, and scheduling—not provincial boundaries. A producer located minutes from a processor across a provincial border should not face unnecessary regulatory barriers simply because that processor happens to be located in another province. Expanding reciprocal access for custom slaughter across all provincial borders would better achieve the Government's objective of reducing interprovincial trade barriers while improving producer access to processing services.

BFO continues to support efforts to reduce unnecessary regulatory barriers while maintaining Canada's high food safety standards. As BFO has stated previously, any broader interprovincial movement of provincially inspected meat intended for commercial sale should continue to require participating jurisdictions to maintain equivalent inspection standards. These safeguards are important not only to maintain consumer confidence within Canada, but also to protect Canada's reputation with international trading partners and avoid unintended consequences for export market access. Canada's meat inspection system underpins the confidence of export markets, and any reforms should be carefully designed to ensure they do not inadvertently create uncertainty for Canada's trading partners.

However, these considerations are fundamentally different from those associated with custom slaughter. Where livestock owners are simply accessing slaughter services across a provincial border and returning the finished product to their home province, the risks are substantially lower than those associated with expanding commercial interprovincial trade in provincially inspected meat products. Accordingly, regulatory approaches for custom slaughter should reflect this lower-risk scenario and avoid unnecessary administrative requirements.

BFO recommends that the Government of Canada:

- Expand the proposed regulatory approach beyond narrowly defined pilot regions and permit reciprocal access to custom slaughter services across all provincial borders.
- Allow producers to transport livestock across provincial boundaries for custom slaughter and return the processed meat to their home province for sale or personal use in accordance with that province's existing regulatory framework.
- Minimize unnecessary administrative and CFIA oversight requirements for low-risk custom slaughter activities where the meat remains subject to the regulatory requirements of the producer's home province.
- Continue to maintain appropriate inspection standards and equivalent food safety outcomes for provincially inspected meat entering broader interprovincial commercial trade.
- Ensure that any future interprovincial trade reforms protect Canada's strong reputation for food safety and preserve the confidence of Canada's international trading partners and export markets.

BFO supports practical, risk-based reforms that improve producer access to slaughter services while maintaining the integrity of Canada's food safety system. The Government has an opportunity to remove a longstanding barrier for livestock producers through a simpler and more

practical regulatory approach. We encourage the Government to distinguish between low-risk custom slaughter activities and broader commercial meat trade, and to adopt a framework that provides meaningful flexibility without compromising food safety or Canada's export reputation.

Sincerely,

A handwritten signature in black ink, appearing to read 'JL', with a long horizontal stroke extending to the right.

Jason Leblond
President