

December 12, 2019

David Haywood-Farmer, President Canadian Cattlemen's Association #180, 6815 – 8th Street NE Calgary, AB T2E 7H7

Dear David,

Re: Canada-U.S. Harmonization of SRM Regulations

The Canadian beef industry has been under stringent specified risk material (SRM) removal regulations for many years, costing our industry well over \$35 million per year based on 2008 statistics. Furthermore, these costs are far greater than the costs associated with SRM removal in the United States, particularly for overthirty-month (OTM) animals where approximately 900 grams of material is required to be removed compared to approximately 58 kilograms of material in Canada. This results in less marketable products and reduced profits for Canadian beef producers and processors. As well, although higher SRM removal costs are associated with OTM cattle, Canada remains uncompetitive with respect to under-thirty-month cattle.

Beef Farmers of Ontario (BFO) is appreciative of the work CCA has done to support Canada's application to the World Animal Health Organization for a change in BSE risk status from "controlled risk" to "negligible risk". Achieving negligible risk status will help enable the recovery of markets lost in 2003 due to discovery of BSE in Canada, and will improve the demand for Canadian cattle with processors in the United States.

Equally important, however, is the need for regulatory changes to reduce the burdens and costs associated with SRM removal in Canada. BFO is concerned by comments that have been made by CFIA officials in the past, most recently at the Canadian Meat Council (CMC) AGM in June of this year when CFIA officials in attendance commented that there are no plans to review Canada's SRM removal requirements, even with a change in Canada's BSE risk status.

In light of this, BFO requests that CCA work with CMC to aggressively lobby the federal government to bring about regulatory change that will create harmonization of SRM removal requirements with U.S. standards, thereby reducing SRM removal and disposal costs, lowering the discount on OTM carcasses, and improving returns for producers and processors.

Thank you for your attention to this important matter.

Sincerely,

Joe Hill, President cc: BFO Board of Directors

130 Malcolm Road, Guelph, ON N1K 1B1 P/ 519.824.0334 TF/ 1.866.370.2333 F/ 519.824.9101

