



July 10, 2018

Janette Leask  
Policy Advisor  
Intergovernmental Relations  
Ontario Ministry of Agriculture, Food and Rural Affairs  
1 Stone Road West  
Guelph, ON N1G 4Y2

Dear Ms. Leask,

Re: *Beef Farmers of Ontario Pre-FPT Comments*

The Beef Farmers of Ontario (BFO) appreciates the opportunity to provide comments to Minister Hardeman in advance of the upcoming Federal, Provincial and Territorial (FPT) Ministers of Agriculture Annual Conference being held in Vancouver, British Columbia July 18-20, 2018. BFO represents 19,000 beef producers in Ontario by advocating in the areas of policy planning, industry development and research, and domestic and export market development.

The following is a list of priority issues of importance to the Ontario beef industry that the Minister may find useful in his upcoming discussions with FPT ministers, senior staff, and other officials:

#### **Business Risk Management**

We believe there is a dire need to improve the fairness and effectiveness of BRM programs to ensure all sectors have access to similar levels of support. The current federal/provincial support structure strongly favours grains, oilseeds, horticulture, and supply managed sectors at the expense of beef, pork and sheep farmers. Ultimately, the level of support that federal and provincial governments provide needs to be more equitable across sectors to ensure that none of the commodities has a disadvantage while competing to remain viable in the marketplace.

And while BFO supports the need for a continuation of the BRM Review Expert Panel's mandate, we advise, that in the absence of any increase in the BRM funding envelope under CAP, that provincial efforts around BRM focus exclusively on expediting the implementation of the PC Party's commitment to increase Ontario's investment in the Risk Management Program (RMP). There is no BRM program more important to Ontario's 19,000 beef farmers than the RMP.

#### **Revisions to Canada's Food Guide**

The proposed revisions to Canada's Food Guide, if implemented as proposed, will deliberately mislead Canadians with respect to the inclusion of meat and dairy as part of a healthy diet and, specifically, perpetuate misinformation about the environmental impacts of beef production.



The Food Guide's references to consuming meat and other wholesome products like dairy, should be framed in a more balanced and fair manner using science-based evidence and expert testimonials from a representative group of Canadian health and nutrition professionals.

The proposed update to Canada's Food Guide should also not include recommendations to eat less meat based on perceived environmental benefits. The environmental recommendations simplify a very complex issue and, given the absence of appropriate context, serve to validate and perpetuate misinformation about the benefits of sustainable beef production, in which Canada is a global leader. Canada's Food Guide should focus on providing nutritional guidance to Canadians, and that alone.

FPT ministers should encourage Minister MacAulay to pursue a delay in the launch of the new Food Guide until such time as:

- 1) the positioning of animal and plant-based proteins within a healthy, balanced diet is clarified to all stakeholders, including healthcare professionals, livestock farmers and livestock associations, and the general public; and,
- 2) the inclusion of red meat and dairy is clearly identified as a key component of a healthy, balanced diet even if the prescription for certain products is to consume in moderation.

### **Implementation of Mandatory Traceability**

With new traceability requirements on the horizon we feel it is necessary to reiterate the position that while the Canadian beef sector supports the advancement of full-chain traceability we do not support any move to implement new traceability regulations until plans to offset the costs to both producers and the broader industry at-large for the establishment, operation, and maintenance of a movement reporting system and all the associated technologies and training are outlined.

Requirements to read and report animal identification tags, input and maintain shipping manifest information, and purchase and maintain the necessary software and hardware will delay the speed of commerce and create additional and unrecoverable costs. Those who will bear the daily costs of the proposed regulations must be provided sufficient assistance upon implementation to ensure they are put in position to comply with the new regulatory requirements without undue financial hardship.

### **Health of Animal Act – Livestock (Humane) Transportation**

The Ontario beef industry is strongly opposed to the proposed reductions to the allowable time in transit for beef cattle under proposed revisions to the *Health of Animals Act*. Our opposition is rooted predominantly in the fact that current outcomes for cattle transport in Canada are exceedingly strong. Agriculture and Agri-Food Canada research on cattle transport in Canada confirms that over 99% of cattle arrive at their destination safely and without injury. Broken down further, 99.95% of all beef animals transported longer than 4 hours reach their destination safely and 99.98% of all beef animals transported less than 4 hours reach their destination safely, without incident or injury.

We have stated repeatedly that any proposed change must demonstrate how the amended regulations will improve outcomes for transported beef cattle without increasing the incidents of injury. The current proposal, in our view, creates significantly higher risks of injury, sickness or death to cattle transported in Canada.

Reduced time in transport will require more frequent stops at one of only a handful of livestock rest stations across Canada where cattle are unloaded, co-mingled with cattle from other farms, and re-loaded. This presents serious concerns for two main reasons. Firstly, the level of stress and risk of injury



to both animals and people are highest during loading and unloading. Secondly, the risk of illness and disease increases dramatically when cattle are exposed to other cattle and livestock species at rest stations. As a result, the ability of beef farmers to limit the risk of illness or injury to cattle in transport will be greatly reduced.

Further research is needed to better understand the relationship between loading, unloading and reloading animals and the associated animal welfare outcomes among difference classes of animals before regulatory changes are introduced. Government must ensure that any rules that increase the frequency and length of rest stops actually brings us closer to a 100% success rate, not take us further away. It would be premature for government to initiate changes to cattle transport rules before these important questions are addressed.

FPT ministers should know that the beef sector is very open to discussing a revised approach to the proposed changes to humane transport regulations, one that would not seriously disrupt the Canadian cattle market or threaten the feeding and processing sectors in Ontario while still meeting government goals for animal welfare.

BFO recommends that FPT ministers support a stay on regulatory implementation until a new approach is developed in consultation with industry that better balances the goals of animal welfare with the needs of the livestock sectors and the realities of current livestock infrastructure and transport.

### **Market Access and Trade**

Meaningful commercial access to international markets is of critical importance to the health and long-term viability of the entire beef supply chain, and broader Canadian red meat sector. The lack of meaningful access to the European Union (EU) provided under CETA, the uncertainty created by the renegotiation of NAFTA, and potential trade disruptions in China and Japan have created considerable uncertainty for beef trade with potentially significant economic consequences.

Specifics around market access and trade include:

#### **i. CPTPP**

We were very encouraged to see Bill C-79, the implementing legislation for the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP), introduced in the House of Commons last month.

Implementation of the CPTPP would provide considerable benefits for the Ontario beef industry, particularly for Ontario's flagship beef brand, Ontario Corn Fed Beef, which has existing high-value partnerships with several Japanese food service providers. The opportunity for growth for Ontario Corn Fed Beef and for other Ontario beef products in the growing Asia-Pacific region is significant.

FPT ministers should strongly support the call for a swift ratification of Bill C-79 this fall to ensure Canada is among the initial six members to implement the agreement.

#### **ii. NAFTA**

The Canadian and U.S. red meat industries continue to benefit from high levels of market integration by capitalizing on the comparative advantages that each country brings in satisfying global demand for meat.



Any renegotiation of NAFTA must, at a minimum maintain the current prohibition on tariffs of red meat products. All NAFTA partners have benefitted greatly from current prohibition on tariffs. The Canadian cattle industry and our U.S and Mexican counterparts are also united in opposing the reintroduction of Country of Origin Labelling (COOL) within the negotiations.

**iii. CETA**

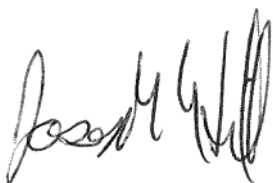
While the Ontario beef industry has long supported CETA as a vehicle for duty-free beef access to the world's largest economy, we are disappointed that the technical conditions that processing facilities must operate under to export to Europe were not addressed prior to signing.

We will not and have not been able to take advantage of this trade deal as long as the EU fails to accept our meat inspection and processing system. Dozens of countries already accept the sanitary measures we have in place and the EU must do the same or the value that CETA could provide the Ontario beef industry will disappear. In fact, Ontario stands to lose the most from the proposed CETA deal if these technical measures are not addressed given the level of competition we already face with imported products as a result of the sheer size of the Ontario market. Increased competition with imported EU beef products without equivalent access to the EU market for our products will create a competitive imbalance that we cannot justify to our producers.

FPT ministers should the support the call for Government of Canada advocacy services to help resolve the outstanding technical barriers with the EU, as soon as possible. If the trade imbalance cannot be resolved in due time the federal government must be prepared to compensate the beef sector and other affected sectors for loss of market share, similar to what the dairy sector received for loss of the domestic dairy and cheese market.

On behalf of the Beef Farmers of Ontario (BFO), we thank you for the opportunity to provide comments in advance of the upcoming FPT Ministers of Agriculture Annual Conference in Vancouver.

Sincerely,



Joe Hill  
President

cc: BFO Board of Directors  
Brendan McKay, Ontario Ministry of Agriculture, Food and Rural Affairs  
John Masswohl, Canadian Cattlemen's Association

