



January 28, 2014

Eric Aubin, National Manager of Animal Identification Programs  
Program Policy Integration Division  
Canadian Food Inspection Agency  
1400 Merivale Road  
Ottawa, Ontario K1A 0Y9

Dear Mr. Aubin,

Re: CFIA consultation on options for livestock traceability requirements

The Beef Farmers of Ontario (BFO) appreciates the opportunity to make preliminary comments on the Canadian Food Inspection Agency's (CFIA) proposed **Options for livestock traceability requirements**.

The Beef Farmers of Ontario (BFO), formerly the Ontario Cattlemen's Association, represents the 19,000 beef producers in Ontario by advocating in the areas of policy planning, industry development and research, and domestic and export market development. As potential regulatory measures imposed to facilitate full chain traceability under the *Health of Animals Act* will have far reaching implications for the beef industry we appreciate the opportunity to provide input.

Before addressing the specific questions in the consultation paper it must be stated that in order for BFO to support any regulated traceability system the following guiding principles must be followed:

- that traceability requirements will not impede or delay commerce;
- that the costs of the system will not result in the industry becoming non-competitive;
- that the technology must be capable of reading identification at a rate which accommodates normal commerce;
- that tolerance ranges for readability be acceptable to the industry standards; and
- that producer information must remain confidential.

As we move toward mandatory federal traceability requirements for the movement of cattle in Canada, our traceability system and the associated technology must, at a minimum, be able to meet the expectations and principles outlined above. BFO does not believe that our current technology and traceability infrastructure can meet these basic guiding principles for traceability. In the current state, cattle RFID tag readability and retention will delay the speed of commerce and create additional and unrecoverable costs. More generally, we as an industry expect government to bear the costs for both producers and the industry at-large in the establishment, operation and maintenance of a movement reporting system, as it is public good. This will help to ensure the industry is not placed a competitive disadvantage.

BFO supports the concept of traceability but will not support any move to implement traceability regulations until a full cost/benefit analysis has been completed giving industry sufficient time to



evaluate the options that have been presented in this consultation. It is our understanding that this analysis will be available in April of 2014 which is positive.

The CFIA consultation document outlines four gaps in the livestock traceability system in Canada. Below are BFO's comments on each.

**Gap 1: Scope: livestock species that share diseases are not all subject to traceability requirements.**

BFO supports the harmonization of regulations for cattle, bison, sheep, goats and cervids. Clearly, the differences that exist between livestock species and their commerce systems will require some variation in the regulatory approach that is taken. However, the intent should remain consistent regardless of species. Cost differences should also be considered. For example, cattle producers spend millions of dollars a year on RFID tags while other species are free of this requirement. The investment made by cattle producers in individual animal ID must be considered as the cattle industry will not accept a more costly regulatory system for traceability than other livestock species that do not require RFID tagging.

**Gap 2: The delay between an event and the time when traceability data is reported to a database does not support an efficient emergency response.**

While a 48 hour reporting requirement would greatly assist in disease management it is simply unrealistic for stakeholders given the realities of our production system and the current shortcomings of traceability technology. BFO recommends that a reporting time allowance of 14 days be implemented to allow operations an adequate amount of time to fill and process full pens of cattle. Many operations, particularly in Eastern Canada, take longer than 7 days to fill pens. In order to maintain the normal speed of commerce a longer reporting period (14 days) is needed. Our support of reducing the reporting window from 30 to 14 days is dependent on the details of the reporting requirements which to date have not been determined.

**Gap 3: The geographic precision of the traceability information gathered does not support an efficient response to a disease outbreak or natural disaster.**

BFO supports the development of nationally consistent movement reporting documents. The Ontario industry recently created a voluntary standardized shipping manifest which includes the minimum data set recommended by the Cattle Implementation Plan (CIP). BFO holds that any new federal regulations should support this and other similar initiatives in other provinces as a means to facilitate movement reporting. In terms of Premises ID, producers should only be required to have one premises identification number which must be made accessible to all relevant national and provincial agencies in the event of a crisis. In addition to being accessible, this number should be integrated and linked with all traceability systems across the country.

**Gap 4: Domestic movement of livestock through high-risk locations, such as co-mingling sites, is not reported.**

The Cattle Implementation Plan (CIP) has addressed this question and provided the following comment February 21, 2012: *If producers have linked co-mingling pasture as part of their primary premises identification, then no reporting is required. Movement of cattle to and/or from a community pasture would be reported if there is co-mingling and the producer does not have the location linked to their primary premises identification. Group movement will be reported through the use of the Canadian cattle movement document or required provincial documentation that captures the necessary data.*

In addition, certain intermediate sites such as local fairs where animals are moved in and back out to the farm of origin in less than 24 hours should be exempt from movement reporting requirements that



would require reporting of movement to the fair and back again upon movement in at the farm of origin. All animals transported to local fairs should be documented and logged but not reported as an official movement so long as they return to the farm of origin within the 24 hour period.

### **Movement Options**

The three movement reporting options presented on *page 17* present considerably different movement proposals, varying in their cost implications, their complexity and their ability to handle an animal disease event. That being said, BFO cannot endorse any one option until the federal and provincial governments outline their commitments to offset costs incurred by the industry in order to facilitate any one of these movement options. If passive read-in is determined to be the best option for industry and government moving forward then BFO would recommend lot movement be introduced initially with passive read-in requirements phased in over time. Again, this recommendation is wholly dependent on the completion on an analysis of the relative costs and benefits of such a system and the federal and provincial government's plan to offset such costs. BFO would strongly recommend that the Livestock Auction Traceability Initiative (LATI) be extended and expanded as one means to offset on-farm infrastructure costs.

Furthermore, the final bullet point on *page 26* which deals with intermediate sites and states that *"the prohibition to receive animals not bearing approved tags would be repealed. However, animals not bearing approved tags when received at the intermediate site would still need to be identified with an approved tag"* is a point which should also apply to terminal sites.

In closing, the cost to industry and government for the traceability system that is ultimately adopted and supported through regulation must be carefully weighed and analyzed with the impacts on the cost to industry scrutinized.

The Beef Farmers of Ontario would like to thank the Canadian Food Inspection Agency for the opportunity to comment on the proposed ***Options for livestock traceability requirements***. We would be pleased to answer any questions on the comments contained in this document and we look forward to participating in further consultations on this important issue.

Sincerely,



Dan Darling  
President

