



August 25, 2015

Cindy Delaloye  
General Manager  
Canadian Beef Grading Agency  
180, 6815 - 8<sup>th</sup> Street NE  
Calgary, Alberta T2E 7H7

Dear Ms. Delaloye

*Re: Proposed Beef, Bison and Veal Carcass Grade Requirements*

The Beef Farmers of Ontario (BFO) 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 and we appreciate the opportunity to comment on the document prepared by the Canadian Beef Grading Agency (CBGA) entitled *Beef, Bison and Veal Carcass Grade Requirements*.

While BFO does not object to the document as currently written we also recognize that providing incorporation by reference will allow future amendments to occur to better align grading standards with industry needs and changing technology without the need to proceed through the formal regulatory amendment process. This is a welcomed change and one that will provide future opportunities for industry engagement regarding carcass grading modernization.

However, incorporating grade standards and regulations by reference creates an oversight gap that must be addressed. Options presented to industry in 2013 as part of the CBGA "*Modernization of Livestock Carcass Grading*" consultation document provided a framework for how future decisions on grade standards and requirements could be handled. At the time BFO endorsed the fourth option that would create a framework for industry-led national grade standard development provided that framework included criteria for both quality and yield grade and was subjected to an evaluation of potential trade implications. Ultimately a decision on the model that will be used to oversee the *Beef, Bison and Veal Carcass Grade Requirements* must be made a priority by CBGA as CFIA moves toward consolidation of federal food regulations through enactment of the *Safe Food for Canadians Act*.

BFO would like to reiterate its position that the modernization of carcass grading standards and requirements should be industry-driven with a focus on simplifying standards and ensuring



carcass quality as well as yield grade if we are truly committed to modernizing our grading system.

The Beef Farmers of Ontario appreciates the opportunity to comment on the Canadian Beef Grading Agency document entitled *Beef, Bison and Veal Carcass Grade Requirements* and we would be pleased to meet with you to discuss our comments in more detail.

Sincerely,

A handwritten signature in dark brown ink, reading "Bob Gordanier". The signature is written in a cursive, flowing style.

Bob Gordanier  
President

cc: BFO Board of Directors  
Ontario Cattle Feeders' Association  
Veal Farmers of Ontario

