



January 12, 2016

Elizabeth Corrigan  
Canadian Food Inspection Agency  
59 Camelot Drive  
Ottawa, Ontario K1A 0Y9

Dear Elizabeth,

*Re: The Beef Farmers of Ontario response to the CFIA Livestock Identification and Traceability Regulations Consultation Summary Report*

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The Beef Farmers of Ontario (BFO) recently reviewed the draft summary of comments received by CFIA from the second round of consultations on proposed amendments to the federal *Health of Animals Regulations* pertaining to livestock identification and traceability. While the majority of BFO comments appear to be reflected in the draft report, there are a number of notable omissions that we wish to have acknowledged in the public record of comments received by CFIA. Below is a summary of those more noteworthy omissions.

**ISSUE 1:        *Section 2.1 – All events required to be reported to the responsible administrator would need to be reported within seven days of the events occurring.***

Despite the relative support reflected in the comment report that was expressed by some provincial and national livestock groups for a 7-day reporting window, BFO requests that the record be amended to include Ontario's recommendation of a 14-day reporting window, as well as our stated concern for the proposed 7-day timeframe.

Common business practice in Ontario is to process cattle only once full pens have been established, to reduce labour costs and cattle handling events; this is a time when movement-in reporting would likely occur. Unlike the majority of operations in Western Canada, Ontario operations typically require more than 7 calendar days to fill pens, given smaller volumes and more infrequent trade. In addition, Ontario is home to many small processors and auctions that operate on a limited basis and at a small scale with limited labour capacity.

While a 7-day reporting requirement would assist in disease management, the realities of the Ontario beef production system would make it difficult to achieve compliance without negatively affecting normal speed of commerce. If in the event of a disease outbreak "*regulated parties would be invited to rapidly report to the administrator livestock traceability information which has been recorded but not yet reported,*" then it seems unreasonable to require operations to report within 7 calendar days. Doing so would only invite non-compliance in Eastern Canada.

Expanding the reporting window to allow for normal speed of commerce while minimizing costs to businesses, particularly smaller operations, while inviting parties to report immediately in the event of



an animal health emergency, strikes a more appropriate balance, in our opinion, between minimizing cost and ensuring an appropriate response time.

**ISSUE 2:        4.18 Export data recording should be streamlined.**

While not a focal point of traceability, export certification was included in the second round of traceability consultations. A major point of contention highlighted in the BFO comments that was not reflected in the official record surrounded our concerns with the duplicative and costly oversight mechanism used for export certification. Currently, CFIA accredits veterinarians to conduct export certification, which is then duplicated by a regional CFIA veterinarian required to provide a wet stamp of approval, who unlike the on-site veterinarian, never comes in contact with the animals being considered for export. This is a costly and duplicative process that needs to be amended. BFO's recommendation that CFIA either eliminate the second tier of export certification approval or eliminate the requirement for a wet signature, and move to electronic certification to streamline the process and reduce costs, should be reflected in the official comment record.

**ISSUE 3:        5.21. The prohibition under the Regulations to receive or cause the reception of animals not bearing an approved indicator would be repealed.**

The proposed prohibition 5.21, to repeal the current requirement preventing the reception of animals not bearing an approved tag, is a welcomed change. However, as we previously stated in our discussions with CFIA, continuing the requirement to re-tag an animal that has lost a tag, either in transit or before transit and just prior to slaughter, produces a regulatory burden that can easily be avoided by repealing the requirement to re-tag slaughter-bound animals. No traceability information can be gleaned from re-tagging an animal at a terminal site aside from where the animal was most recently transported, and in most cases that information can be easily obtained from the movement reporting document (manifest) that, under the current proposal, will be required.

The notable omission from the record of comments, which BFO would like to see included, is the recommendation to repeal the requirement to re-tag an animal that has lost its tag on direct to processor movements, given the above rationale and in light of the proposed changes under sections 5.21 and 5.22.

The Beef Farmers of Ontario would like to thank the Canadian Food Inspection Agency for the opportunity to respond to the draft summary of comments received from the 2<sup>nd</sup> round of consultations on the **Canadian Livestock Identification and Traceability Program**. 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,



Bob Gordanier  
President

Cc: BFO Board of Directors/ BFO Feedlot Committee/ BFO Cow-Calf Committee  
Jim Clark, OCFA  
Heather Cassidy, OMAFRA  
Colleen McElwain, OMAFRA

