



July 29, 2016

Sergio Toluoso, National Manager
Feed Program Coordination and Outreach Section
Animal Feed Division
Canadian Food Inspection Agency
59 Camelot Drive
Ottawa, ON K1A 0Y9

Dear Sergio,

The Beef Farmers of Ontario (BFO) appreciates the opportunity to provide comments on the most recent segment of the Canadian Food Inspection Agency's Proposed Regulatory and Policy Changes. 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.

The following section contains our comments on specific proposed changes to the federal *Feeds Regulations*.

Permissible Claims on Feed Labels / Required Nutrient Guarantees

Due to the various external factors that impact the beef industry, it is essential to beef farmers that cattle growth and performance be as carefully and efficiently controlled as possible. Feed composition and reliability is therefore paramount to a profitable and productive beef farming operation. BFO understands that feed producers will be required to provide proof of claims in the case that a claim is questioned. However, there is concern that in reality, due to lack of pre-market assessment, salesmen may feel they have leeway to make exaggerated claims about the performance effects of a feed. Ultimately, any change to the *Feeds Regulations* must ensure an adequate level of protection exists to ensure beef producers receive accurate and defensible claims regarding feed products.

Veterinary Biologics in Feeds

[no comments currently]

Standards for Weed Seeds in Livestock Feeds

BFO is concerned about the potential impact to grain products that are sold as screenings that may result from the reference in the Canadian Grain Commission's *Off Grades of Grain and Grades of Screenings Order* to "seeds designated as injurious in the *Feeds Regulations*". The addition of weed seed species of concern not currently included in the regulations, as well as potential future changes the incorporation by reference may allow, could impact the compliance rating of future grain products sold as screenings.

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Screenings are a valuable nutritional tool for cattle feeders, and the beef industry is a significant consumer of screening products in Canada. As such, BFO encourages CFIA to ensure that screening products, currently in safe use by cattle feeders in Canada, are not made unavailable or impacted as a result of changes to the *Regulations*.

The Beef Farmers of Ontario would like to thank the Canadian Food Inspection Agency for the opportunity to comment on the proposed changes to the federal *Feed Regulations*, and we look forward to participating in further consultations on this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Bowman", is written on a light yellow rectangular background.

Matt Bowman
President

cc: BFO Board of Directors

