Ontario Federation of Agriculture

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Plant and Animal Health Strategy
Strategic Initiatives Division – Plant & Animal Programs
Canadian Food Inspection Agency
59 Camelot Drive
Ottawa, Ontario
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Re: Developing a National Strategy to Safeguard Plant and Animal Health in Canada

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 36,000 family farm businesses across Ontario. These farm businesses form the backbone of our robust food system and rural communities with the potential to drive the Ontario and Canadian economy forward.

Many of the risks faced by the agriculture sector are outside the control of individual producers and have the potential to turn into emergency situations. In the absence of an effective and timely response, these emergency situations can threaten the sustainability of individual producer's businesses and the broader Canadian agricultural sector. OFA fully supports the need to formalize a national strategy for managing emergency situations within the Canadian agricultural sector and safeguard plant and animal health in Canada. OFA is pleased to provide the following comments and suggestions on the discussion document: "Developing a National Strategy to Safeguard Plant and Animal Health in Canada".

Scope, Vision, and Objectives

OFA is pleased to see the strategy is working towards a collaborative and coordinated approach by governments, stakeholders and academia. Understanding each of the participant's roles, responsibilities and action plans for all groups is vital to the successful implementation of a national strategy. Effective and frequent communication enables participating parties to understand each other's roles. In addition, adequate resources must be provided to all stakeholder groups for each to effectively carry out their roles.

A prevention-based approach aimed at high-risk areas is effective for addressing the areas of highest concern. It will be important to understand the agricultural demographics and the prevalence of pests and disease in these areas. Data sharing and mapping can help inform stakeholders, leading to more awareness and resources for safeguarding.

During the recent Porcine Epidemic Diarrhoea (PED) outbreak in Southwestern Ontario, partnerships between OMAFRA, Ontario Pork and the Ontario Pork Industry Council led to better monitoring of on-farm outbreaks. Through monitoring efforts, areas of risk were identified and biosecurity measures were enhanced. Producers and stakeholders throughout the value chain were also informed on preventative strategies to minimize risk.

Due to the potential of interaction throughout the value-chain, area-specific risk must not be the only initiative undertaken in the strategy. National and international collaboration, as well as risk assessment of imported and domestic inputs, are imperative. The movement of pests and diseases through other modes of migration (wind, land, machinery/vehicles, wildlife, and other vectors) is also a real threat to agriculture, reinforcing the need for collaboration and coordination among all groups identified in the strategy.

To what extent does the proposed scope reflect risks?

The current scope is a good starting point towards a national strategy, however, it will be important to distinguish that plant health and animal health strategies will be very different. Even on a commodity basis, a blanketed approach, or one-size-fits-all, would not be applicable because of the different pests and diseases, as well as the variability in which producers operate. Approaching the strategy from the bottom-up will improve mitigation, prevention, response, and recovery initiatives.

A community approach is beneficial, as response and recovery can be a localized effort that needs tools and resources from governments and industry. As we work towards emergency outbreak situations, even for managing pest and weed resistance, there is a reliance on other stakeholders to maintain a standard of procedures that leads to risk mitigation.

Is there anything that should be added or removed from the scope?

The key activities referenced are prevention and mitigation. Through advanced research, collaboration, and technology we can identify potential risks and preventative measures can be taken.

The strategy must include “Identification” within its scope as an activity. Identifying the risk is a key first step to effectively carry out all other activities listed in the scope of the strategy. This is implied throughout the strategy, but it needs to be highlighted within the scope summary as a key activity. Pest or disease prevalence needs to be identified first, before some preventative or mitigation strategies are implemented.

Government and industry must research and monitor in other locations to assess and identify possible risk. For example, unidentified feed inputs risks contributed to the most recent PED outbreak in Ontario. These pathways need to be identified and monitored.

Additionally, this past growing season, there was a minor outbreak of stripe rust in Ontario winter wheat for the first time in over 25 years. The warmer climate allowed the fungus to migrate North. When it was time to mitigate, or respond, not all producers were prepared to do so effectively, or on time. Assessing the activities conducted during an emergency response will be essential to improving the industry’s response.

We are seeing a similar scenario happen with the Spotted-wing Drosphelia, which was introduced in the United States in 2010. Climate change could provide ideal conditions that increase pest pressures on fruit crops in Norfolk County. Government and industry needs to provide the proper tools for prevention and control should pressures of new pests arise.

In addition to working with industry stakeholders, we must identify other sectors within the scope of the strategy. Wildlife can sometimes be affected by disease, or become a vector for diseases and pathogens. Data from wildlife pathogen and disease monitoring efforts should be considered. For example, the Avian Influenza Virus had the ability to be transferred from wild turkey to poultry facilities and vice versa. The scope should be expanded to include other sectors that have expertise in these areas.

Private and municipal properties can also be a vector for pests, pathogens and disease, and should be included in the scope. Private and municipal monitoring is essential to prevent contamination to the agriculture sector. For example, fungal, bacterial, and viral tree diseases (e.g. Plum Pox Virus) exist on private and municipal properties and contaminate neighbouring orchards. Municipalities and the public need to be educated on these diseases and how to identify, control, and prevent them. It is essential that outreach through the strategy extends out to all levels of government.

While the strategy leaves out tampering and extreme weather events, it is important to acknowledge that the increased threat to biosecurity via tampering as a real concern for public safety and producers.

Extreme weather events are not included in the strategy, however, resiliency to climate change is essential to maintaining food security, and preventing pest or disease pressures that may thrive in these new conditions. Monitoring extreme weather events and how they may affect the industry is essential. Investment in infrastructure to improve resiliency will be a priority to assist the industry in adapting to changing growing conditions.

Roles and Responsibilities

Articulating roles and responsibilities within the strategy will be the first step towards a collaborative approach to safeguarding plant and animal health in Canada. Integration of all identified sectors begins with clearly communicated roles and responsibilities, given to the parties most qualified to implement them under the strategy.

Roles and responsibilities include: providing research and identifying potential risks, as well as data collecting and analyzing. For this information to be applicable, it must be disseminated down to the producer level. Confidence in the system is important for producers, the public, and for trading partners. Confidence must be reinforced by proper communication, and integration between all sectors to ensure that information is being streamlined.

Producers, public, municipalities, and other sectors also need to be informed about potential risks and how to properly prepare, prevent, mitigate, and respond to plant and animal health risks. New technology, research, and funding must be provided to effectively implement these activities at the community level. Awareness is vital to bring sectors together to work towards mitigation and prevention of plant and animal health risks.

Many of these roles will be a joint initiative through academia, commodity organizations, and government ministries. For example, there is a partnership between the University of Guelph and OMAFRA, along with commodity groups who contribute information and share plant and animal health research. CFIA has a key role as well, working with all sectors to identify key pests and diseases, and respond accordingly through programs and communication efforts.

CFIA also plays a critical role in collecting systematic and integrated information from multiple national and international sources. Harnessing surveillance data in real-time, and data from fore-sighting tools can help inform on potential hazards to plant and animal health. These efforts will not only identify and monitor pest and disease prevalence, but also contribute to research on how they can be effectively mitigated. Through the development of new technology and Best Management Practices (BMPs), better biosecurity implementation can be established for producers. Funding for producers and others throughout the value-chain will be needed to support these efforts for research, outreach, data collection and BMP implementation.

Funding for these initiatives can be leveraged from various programs, and allocated from Agriculture and Agri-Food Canada (AAFC). The Federal Government could also consider dedicating a fund through the National Animal and Plant Health Strategy to allocate towards infrastructure, resources for data collection, IT infrastructure, and other resources to help implement the strategy.

Dedicated funding to rural infrastructure and increasing provincial transfers to rural municipalities will support action at the municipal level and safeguard plant and animal health through rural investment. Reliable rural internet is necessary for producers to connect with available resources. Investment in infrastructure to increase resilience to climate change will also be vital to help the value-chain maintain resilience.

Improving sector resilience

For risks that cannot be addressed through on-farm management practices, access to effective risk management programs provides Canadian producers with the income stability to invest in innovative technologies, adaptability to evolving market demands, and the ability to maintain consistency during long-term economic growth.

Business Risk Management (BRM) programs play a key role in helping producers recover from disaster, but only if producers continue to participate in these programs. Growing Forward 2's 2013 reduction in support and coverage levels provided under AgriStability have eroded producer confidence in the current suite of BRM programs. Low participation in these programs compromises the agriculture sector's ability to withstand disaster situations. Enhanced function of programs, such as AgriRecovery, would also allow the sector to recover from disaster situations. Significant amendments are required to restore confidence, increase producer participation, and ensure that a credible suite of BRM programs are available to Canadian producers.

In addition, these programs could be a valuable source of data used to inform an emergency response. Farm demographics, emergency events, and the uptake of risk preventative efforts can be assessed through temporal and spatial data integration, which is another benefit of increasing producer participation in BRM programs.

The Agricultural Policy Framework (APF) also includes funding programs and services for Canadian producers and processors. Under Growing Forward 2, funding has contributed to the uptake of prevention and biosecurity measures. Some of this funding was directed towards a specific emergency response, such as funding availability for pork producers following the PED outbreak in Ontario. Continued support from the next APF is essential to further research and development, innovative prevention and monitoring efforts, and biosecurity BMP uptake.

The AgriRisk program is also a potential avenue to develop new risk management tools that address biosecurity risks in the Canadian agricultural sector. Under Growing Forward, the Private Sector Risk Management Partnership (PSRMP) program included initiatives from various sectors that were supported in partnership with AAFC to address plant and animal health issues. The Canadian Egg Industry Reciprocal Insurance Alliance (CEIRIA) was supported by such a program. The CEIRIA is a governance body that has developed a risk management program for *Salmonella enteritidis (*SE) affected flocks in the egg supply chain. CEIRIA insures all Canadian-regulated egg producers, and downstream subscribers, with a detected presence of SE. Developing these type of programs leads to better monitoring and detection efforts, as well as better data collection.

Increase the adoption of prevention and biosecurity measures

In addition to insurance programs: research and development of biosecurity protocols, sector-specific risk assessment, risk analysis, and policy analysis can be supported through sector-specific programming. The research and data collected from these programs can contribute to the overall national strategy. Continued support from the federal government for these programs is highly recommended to enhance existing protocols and create standards for those that do not currently have them. Some information and protocols are compiled at AgBiosecurity.ca for producers, industry, and stakeholders to utilize. Web resources and communication tools are essential to streamline protocols and offer supplementary information to all stakeholders.

Some preventative and biosecurity measures are minor, inexpensive changes to an operation. Sectors need to disseminate BMP information to producers and other stakeholders to increase the adoption of all risk mitigating measures, especially simple and inexpensive initiatives. Dissemination must happen throughout the value-chain, including those responsible for transporting, so another's efforts are not negated. A collaborative approach to identify BMPs and disseminate the information would help increase adoption. Industry and commodity organizations are well equipped to produce and transfer this information, and many are already doing so. Support will be needed from federal and provincial governments to educate staff, public, and municipalities on their roles and responsibilities for adopting risk mitigating practices.

Farmers in Canada rely on strict biosecurity protocols on their farms to maintain the health and safety of their animals. Disregarding these protocols can have severe consequences on animal health, individual farm operations and the entire agricultural sector.

Canadian farmers understand that they will be subject to compliance inspections on occasion by regulatory agencies, and that some have legislated powers of entry to enter farm properties. In many cases in Ontario, government personnel that are neither familiar with, nor following, biosecurity protocols are making farm visits.

OFA has recently requested that the Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA) conduct a comprehensive review of the biosecurity protocols in place across all ministries and agencies with the authority to make on-farm visits. We recommended to OMAFRA that this review should investigate the following:

- The alignment and adherence to a standardized set of protocols to ensure that all regulatory enforcement personnel are receiving the same information
- The frequency of enforcement personnel training on farm biosecurity

- The complaint process in the event that a farmer witnesses enforcement personnel not following the standard practices

Should this review uncover an inconsistency in the protocols and training across regulatory agencies, OFA has requested that OMAFRA provide a standardized set of acceptable biosecurity protocols and a recommended training schedule to agencies and other ministries. Furthermore, the biosecurity training status of all regulatory agencies should be posted on the OMAFRA biosecurity webpage and made available in an OMAFRA factsheet or printed format.
These biosecurity threats are not limited to Ontario farms or Ontario government personnel. Therefore, a similar comprehensive review of the biosecurity protocols in place across all federal departments and agencies should be conducted and should be coordinated with OMAFRA and OMAFRA's counterpart in each province/territory across Canada.

Providing sector with the proper tools for control and mitigation

Canada is expected to be affected by climate change over time, which can bring new opportunities for agriculture, but also new challenges. Growers will have the opportunity to produce new products in new climatic conditions. Consequently, these new conditions will also enable new pests and diseases for new and existing crops. FPT governments must provide tools for farmers to mitigate and control pest and disease pressures on all crops.

The strategy must increase the availability of effective pest and disease control and mitigation tools for producers so that they will have access to these tools to use on new crops, existing crops, and crops that may expand in the future. Collaboration between the Pest Management Regulatory Agency (PMRA), provinces, and industry will be essential.

In addition, research must be expanded to assess the potential risks for growing new crops, and what risks will emerge with climate change. Keeping many tools in producer's toolbox will ensure maximum control while avoiding pest and disease resistance.

Assessing antimicrobial resistance (AMR) and monitoring data on antimicrobial active pharmaceutical ingredients (API) will be important to assess the risk of resistance in livestock. Utilizing resources such as the Veterinary Drug Dictorate (VDD) and the Canadian Integrated Program for Antimicrobial Resistance Surveillance (CIPARS) will help monitor antimicrobial use and resistance. CFIA must also work with Health Canada to ensure that other mitigation or control tools will be available for producers. There are many effective low-risk veterinary health products (VHP) that must be made available to producers. Research and development in new vaccines, VHP, and other control and preventative methods needs to be expanded to increase resiliency to disease.

Enhance systematic information integration, access to expertise, and research

Surveillance leads to early detection of disease, and must be a critical component of the prevention strategy within the Emergency Management Framework for Agriculture in Canada. If a disease is identified early and dealt with in a relatively small geographical area, the costs associated with the issue will be minor. If the disease is not identified until it has spread to different areas of the country, the costs to address the disease and the threat to health and safety rises exponentially.

Surveillance also plays a huge role in mitigating the impacts of a disease outbreak. Proper surveillance is needed to monitor the spread of disease and allows us to know critical information, such as: the rate at which a disease is spreading, the geographical directions it is spreading, and the populations that could be impacted by the disease spread. This information is vital in any attempt to mitigate the damages and risk involved with any disease outbreak. Current surveillance and traceability initiatives need to be integrated to effectively monitor pest and disease prevalence. The use of precision agriculture technologies should also be considered as a way of gathering surveillance of plant and animal health.

Investment in research conducted by industry, government, and academia partnerships can also advance technology, genetics, and control methods to help support plant and animal health. New technologies, such as CRISPR genome editing, can improve resilience to disease and resistant pests. Innovative research and technology needs to be supported by FPT governments to enable the industry to continue to produce competitive, healthy, and safe products.

Funding dollars for research and adaptation of agricultural surveillance and traceability measures such as Be Seen Be Safe (beseenbesafe.ca), must be made available by FPT governments as part of a national biosecurity effort. Funding for information integration should also be made available to support initiatives.

Supporting organizations working towards innovative initiatives such as Be Seen Safe will help network expertise towards innovative research and technology to improve biosecurity protocol and systematic information integration.

OFA has partnered with stakeholders across the value chain on the Farm Food and Beyond initiative (sustainablefarms.ca) to understand the industry's needs through a consultative process. The long-term intent of the initiative is to streamline sustainability initiatives by benchmarking verification standards, some of which intersect with plant and animal health. This is not a new plan or program, but rather an effort to develop a framework that will facilitate communication and reporting across various programs. A similar approach would be beneficial to collect data and information for animal and plant health strategy.

Organizing annual events to exchange expertise on research, technology advances, and BMP protocols would encourage further networking and improve the national approach to plant and animal health.

Leverage of national and international alliances

National and international alliances will be important for detecting potential risks, as well as improving trade relationships. By creating strong alliances through a robust plant and animal health strategy, trade partnerships will improve with increased confidence from international partners. A robust protocol for monitoring and detection that is consistent with international partners will be important to avoid transfer of pest and disease. This will be particularly important with North American partners, where transfer of disease and pests is land based, and not necessarily limited by imports or exports of products. Monitoring of disease and traceability of imports and exports will be important to mitigate plant and animal health risks from other areas. Traceability protocols using adequate screening and detection from origin or point of entry would require consistent communication and information sharing, but would be an effective mitigation tool. This will involve a robust detection protocol at our borders.

Prioritization of themes

The themes in the discussion paper, as well as the suggestions provided in this document, will help to develop actions to implement a National Strategy for safeguarding plant and animal health in Canada.

While OFA finds all the themes valuable, the key themes of importance are:

- Define Roles and Responsibilities;
- Enhance Research;
- Collect Systematic Information;
- Enhance Collaboration; and
- Increase Adoption of Biosecurity Measures

Their related activities will help support many of the initiatives within the discussion paper. All themes identified above are dependent on the successful implementation of activities within the plan. Finding efficiency in how to undertake these activities by utilizing existing resources will be essential to initiate the tasks described in the strategy.

OFA appreciates the opportunity to provide comments on the current strategy. We look forward to implementing a higher focussed strategy in a collaborative effort with all sectors and stakeholders.

Yours sincerely,

Keith Currie
President