

September 24, 2020

Dr. Penny Greenwood
National Manager of Domestic Disease Control Section Canadian Food Inspection Agency
59 Camelot Drive
Ottawa, ON
K1A 0Y9

Via cfia.animalhealthregs-reglessantedesanimaux.acia@canada.ca

Dear Dr. Greenwood,

RE: Proposed changes to the Health of Animals Regulations – Hatcheries and Supply Flocks

The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members across the province. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. We are passionate and dedicated to ensuring the agri-food sector and our rural communities are included, consulted and considered in any new and changing legislation that impacts the sustainability and growth of our farm businesses.

Ontario's diverse and innovative agri-food sector is a powerhouse for the province – growing and producing more than 200 farm and food products, fuelling our rural communities and driving the provincial economy by generating more than 860,000 jobs and contributing over \$47 billion to Ontario's annual GDP. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities.

OFA is writing to you today with comments on CFIA's consultation on proposed hatchery regulations. OFA is supportive of the much of the proposed regulations as they represent a positive step in the right direction.

However, we do have concerns and suggested changes the following subsections of the draft regulations:

- Section 72.12
- Section 72.16
- Section 72.18
- Section 72.20

Section 72.12

OFA supports the definitions of hatcheries in paragraphs A & B of section 72.12 (1) but we believe paragraphs C & D should be removed. In our view, hatcheries should be described as "*a premise or building that receives hatching eggs from breeder flocks and incubates them*". Acquiring day-

old birds is not directly related to the hatchery operation and should not be used as a factor to classify an operator as a hatchery as suggested in paragraph D.

We recommend that section 72.12 (1) be modified to read as follows: *“This Part applies to a hatchery that has a minimum setting capacity of 1,000 eggs, that receives hatching eggs from supply flock operations, and that sets the hatching eggs for incubation.”*

Since there are already measures in place to ensure that only suitable eggs are picked up by a hatchery, OFA believes that hatcheries should be allowed to continue receiving non-incubated eggs to be sold for human consumption. As long as there are measures on the farm to ensure that the non-settable eggs, such as cracked or dirty eggs, are removed before pick-up by the hatchery there is no risk in having eggs picked up by a hatchery.

Section 72.16

Given that different types of hatcheries could have different practices, OFA does not believe it is appropriate for the regulation to reference the Code of Practice for Hatching Eggs Breeders, Chickens and Turkeys. This code was developed for specifically chicken and turkey production and not other species of poultry. The best practices for chicken and turkey hatcheries may not apply to all hatcheries.

This section also refers to specific sections of the Code of Practice related to on-farm activities that do not apply to hatcheries. For these reasons, OFA suggests that Section 72.16 as currently worded be removed and replaced with the following suggested wording; *“Every hatchery operator shall follow animal care requirements and recommended practices that promote animal welfare based on accepted standards of practices, such as the Code of Practice for the Care and Handling of Hatching Eggs, Breeders, Chickens and Turkeys for chicken and turkey hatcheries.”*

Section 72.18

Section 72.18 refers to supply flocks and deals with preventive control plans (PCPs), testing requirements and animal welfare. It is not reasonable to expect hatcheries to be held responsible for the PCP implementation by supply flock operators. This would place an undue administrative burden on hatcheries.

OFA also has concerns that these regulations may inadvertently damage to Canada’s international trade relations. A significant amount of the eggs that hatcheries receive are imported. International suppliers should be permitted to abide by equivalent measures instead of compliance with Canadian codes of practice.

For these reasons, OFA strongly recommends that Section 72.18 be removed entirely to ensure that hatcheries can continue to rely on letters of guarantee from suppliers as acceptable compliance with the PCP requirement. It is critical that regulations do not inadvertently impose a non-tariff trade barrier on imports of hatching eggs or day-old birds.

Section 72.20

To avoid redundant regulation and administrative burden on hatcheries, OFA recommends that the information required in section 72.20 be limited to production data only. OFA recommends that all paragraphs in this section be eliminated except for paragraphs A, B, C, E and F.

OFA appreciates the opportunity to provide feedback on the proposed regulations. We trust our recommendations will be given the due consideration they deserve.

Sincerely,



Keith Currie
President

cc: Mary Robinson, President, Canadian Federation of Agriculture
Paul Bulman, President, Ontario Hatcheries Association
OFA Board of Directors